

Public Document Pack

Date of meeting Tuesday, 11th March, 2014
Time 7.00 pm
Venue Council Chamber, Civic Offices, Merrial Street,
Newcastle-under-Lyme, Staffordshire, ST5 2AG
Contact Geoff Durham

Planning Committee

SUPPLEMENTARY AGENDA (2)

PART 1 – OPEN AGENDA

- 4a Land between Apedale Road and Palatine Drive Chesterton. (Pages 1 - 6)
13/00525/OUT
- 6a Linley Trading Estate, Linley Road, Talke. 13/00625/OUT (Pages 7 - 8)
- 14a The Plan for Stafford (Pages 9 - 14)

Members: Councillors Miss Baker, Cairns, Clarke (Chair), Fear, Hambleton,
Mrs Hambleton, Howells, Matthews, Miss Reddish, Stringer (Vice-Chair),
Studd, Sweeney, Turner, Williams and Mrs Williams

PLEASE NOTE: The Council Chamber and Committee Room 1 are fitted with a loop system. In addition, there is a volume button on the base of the microphones. A portable loop system is available for all other rooms upon request.

Members of the Council: If you identify any personal training/development requirements from any of the items included in this agenda or through issues raised during the meeting, please bring them to the attention of the Democratic Services Officer at the close of the meeting.

Meeting Quorums :- 16+= 5 Members; 10-15=4 Members; 5-9=3 Members; 5 or less = 2 Members.

Officers will be in attendance prior to the meeting for informal discussions on agenda items.

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ADVANCE SUPPLEMENTARY REPORT

TO THE PLANNING COMMITTEE

11th March 2014

Agenda item 4

Application ref 13/00525/OUT

Land South of Apedale Road and North of Palatine Drive Chesterton

Since the preparation of the agenda report your officers have received further advice from the District Valuer in respect of what levels of affordable housing, taken with a policy compliant level of contributions (£2.038m) might, in his view, result in a viable scheme.

His conclusions are that for the proposal to be policy compliant in respect of financial contributions (i.e. £2.038 million) the proposal could provide approximately 20% affordable housing and still be viable.

This is some way from where the applicant considers the proposal to be viable (i.e. 10% affordable housing and approximately £1.8 million of financial contributions).

The applicant Lands Improvement advise that it appreciates the need in principle to mitigate the impacts of the development proposed, and in this context, is willing to increase its Section 106 financial contribution to provide a full policy compliant position – i.e. £2.038 million. They point out that this contribution will fully address the development impacts including education, transport and maintenance of open space.

Lands Improvement (LI) still has concerns that the viability of the scheme is not as positive as the District Valuer is maintaining and this is highlighted in the assessments submitted to date. It points out that a small difference (less than 1% in most cases) in a number of the variables in each model results in significant differences to the predicted viability of the scheme. It recognises that it is not possible to reach agreement on all the matters, and in this context it has put forward various proposals.

Before these proposals are considered members' attention is drawn to the fact that one of the financial contributions is a notional contribution (£672K), towards the costs the Council would have to bear if it were to end up maintaining the open space within the development. It is notional in the sense that it is not based upon any estimate of the actual costs of maintaining this particular open space, but rather relies upon a wider estimate, contained within the Green Space Strategy, of the cost of maintaining new open space over a 10 year period.

It may well transpire that an alternative arrangement is eventually reached whereby the land is maintained in the long term not by the Borough Council but by another party such as the Land Trust – an arrangement to which the Borough Council could not object, in which case it has to be accepted that it would be unreasonable to require that particular payment. Although that alternative arrangement may lower the sales values of the houses within the development that would be achievable, it is not possible given the stage the proposals have reached to model this impact now and neither the applicant's nor the District Valuer's appraisals have taken this possibility into account. Indeed no clear way of reliably estimating this impact appears to exist.

The first proposal LI make, is that in addition a fixed £2.038m contribution (subject to the above qualification) there should, with respect to the amount of affordable housing be a minimum 10% on site affordable housing (35 dwellings) plus an upward only review mechanism (with a 25% cap), or equivalent off site financial payment in lieu if deemed appropriate. The review mechanism would come into play **both** prior to the commencement of each of the three housebuilding phases **and** in the event of a failure to either achieve substantial commencement by a certain date or to then maintain reasonable progress (matters that would still need to be negotiated between the parties).

Your Officers have had further discussions/ negotiations with the applicants and their agent in respect of this revised offer and a further alternative offer has been received – maintaining the fully compliant financial contribution of £2.038m (again subject to the above qualification) and this time increasing the affordable housing to a minimum of 10% on site provision with a further 5% either on site provision or the equivalent financial contribution for off site provision – i.e. a 15% affordable housing contribution. In this scenario there would however be no review mechanism prior to the commencement of each of the building phases.

Your Officers' comments

The Council's adopted Developer Contributions SPD advises that viability assessments should be evidence based. In this particular case there is a difference between the conclusions on this evidence, this may be due to variable assumptions within the assessment and its appraisal. The SPD goes on to advise "*negotiation over the level of and nature of contributions will be assessed on a site-by-site basis, having regard to the financial appraisal. It will take account of the economics of the development and other national, regional and local planning objectives that may affect the economic viability of the proposal. Ultimately, the Elected Members of the Planning Committee will take the decision on the appropriate scale and nature of contributions.*"

Any consideration of the issue of the level of Section 106 contributions however has to be in the context of the National Planning Policy Framework (NPPF) which postdates the Developer Contributions SPD. The NPPF indicates that *“to ensure viability, the costs of any requirement likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure, contributions or other requirements, should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing landowner **and** willing developer to enable the development to be deliverable* (para 173)

The NPPF goes onto indicate that *“local authorities should take account of market conditions over time, and where appropriate, be sufficiently flexible to prevent planned development being stalled”* (para 205). Members will no doubt recall the Midland House, London Road appeal decision where an Inspector allowed a development without any contribution towards pff site public open space maintenance in part on this basis.

The applicant’s agent advises the applicant is very keen to work with the Council to deliver this important site which will assist in the regeneration of the local area and boost the supply of housing.

This site will take some considerable length of time to deliver actual housing development (i.e. any completions) – because of the nature of the works of ground preparation which are involved and which the applicant expects to take 3 years. However that in no way diminishes the critical importance of this development to the Borough Council’s housing land supply in the light of other recent Committee decisions – particularly in that account has already been taken of this site in the housing land supply calculations. The NPPF has a very strong focus and emphasis on the importance of the planning system delivering both land for development and the development itself

The applicant has also pointed out whilst the housing would not be delivered immediately given the long, capital intensive, infrastructure phase of this development, this initial infrastructure phase would still have benefits to the employment prospects of the area.

Members need to be aware financial appraisals are not an exact science and are subject to a number of variables, in the body of the appraisal together with assumptions made which can have major implication to the figures which are produced. This position is recognised and acceptable by both parties including their advisors.

Whilst it relatively easy to predict the construction of a dwelling itself, certain assumptions have to be made to other elements of this development including the moving and changing of

ground levels across the site. Whilst some of these elements are reasonably predictable (on the basis of 'standard' costs, other are not so predictable until tenders are invited, etc.

Furthermore there is understood to be a particular consideration which the District Valuer's appraisal has not put a figure upon – the provision of a competitive return providing a sufficient incentive to the landowner to ensure that the site is brought forward for development. This is a matter essentially of subjective judgement, but it still needs to be considered by the Local Planning Authority.

As already indicated in the agenda report the development in addition to making potentially a very important contribution towards housing land supply, brings with it important benefits for Chesterton, namely a much needed development in a part of the district where there continues to be a need to pursue its regeneration and where residential development is likely to bring benefits in terms of increased trade to the local district centre.

The Council's SPD on affordable housing sets out a requirement (of 25%), but viability is well recognised to be a significant material consideration which must be taken into account in planning decisions. In this context, and taking into account both the NPPF guidance, the RICS Guidance Note on Financial Viability in Planning and an appeal decision that is generally recognised as having set an important benchmark for these types of cases, your Officer has reflected upon the two offers that have been made, and has explored other alternatives with the developer (including a hybrid proposal that would ensure 15% in the first phase but the level achieved in subsequent phases and over the whole site would be determined by a review which would have both a cap and floor of 20% and 10% respectively).

It appears to your officer that any offer to be acceptable must include provision for a financial appraisal review that could be triggered by a failure to achieve a substantive commencement of the development within a certain period. It is understood that the applicant accepts this, although details of this trigger have not yet been agreed.

Your Officer notes that the first offer includes an upward only review mechanism reflecting the size of the development, the outline nature of the proposals, and the nature of the assumptions that have had to be made by both parties in the prediction of viability.

The second offer has a distinct disadvantage in that it fails to provide a review mechanism, however upon reflection it does have significant merit in that it provides a degree of certainty which the first offer simply cannot do. That is highly likely to encourage the delivery of the site and its development. Negotiations over the terms of such the review mechanism would doubtless expose the inherent tension between the objective of pursuing the delivery of new

development (to which the NPPF gives such importance) with that of appropriate scrutiny and rigour.

With either option the Council has secured the appropriate developer contributions. The issue is solely about the level of affordable housing, but the Council's primary concerns it is considered must be with **delivery**. To this end in addition to setting an appropriate trigger for review in the event of "substantial commencement" not being secured, it is suggested that any agreement should require a continued delivery of housing completions failing which a review would be triggered.

Provided the latter is also secured whilst the 10% upward review only offer is not unacceptable, your Officer's firm view in this case is that the option more closely aligned to the position of the Council is the second offer and this is reflected in the recommendation below.

Whilst the recommendation to permit the application subject to conditions as set out in the main report, in light of the advice received and other information outlined above, your Officer now recommends that the section 106 obligations contained within Recommendation A be as follows:-

- 1) A contribution of phased payments towards the Newcastle (urban) Transport and Development Strategy (NTADS) in a total sum of £193,313;**
- 2) A contribution of phased payments towards an extended bus service in a total sum of £350,000;**
- 3) A contribution of phased payments towards school spaces in a total sum of £816,294;**
- 4) Affordable Housing provision at a minimum level of 10% on site provision together with a further 5% on site provision or the equivalent (5%) financial contribution for off site affordable housing provision.**
- 5) EITHER a contribution of £672,000 towards Open space maintenance provision OR the entering into of a Management agreement to secure the long term maintenance of the public open space;**
- 6) A Travel Plan monitoring fee in the sum of £6,200;**

- 7) That a financial viability reappraisal be undertaken EITHER if phase 1 of the development has not been substantially commenced within 28 months of the grant of this outline planning permission (substantial development being defined in this case by completion of all earthworks and remediation as identified in an already received development programme) OR if a continual delivery of housing development is not thereafter maintained, and appropriate adjustments be made, on the basis of such reappraisal(s) to the level of affordable housing referred to in 4) above with a floor of 10% and a cap of 25%;**

Recommendation B remains unchanged

ADVANCE SUPPLEMENTARY REPORT
TO THE PLANNING COMMITTEE
11th March 2014

Agenda item 6

Application ref 13/00625/OUT

Linley Trading Estate, Linley Road

As indicated in the agenda report a supplementary report is provide with advice for members following consideration of the position put forward by the applicant which has been reproduced in almost its entirety

Since the agenda report was prepared a formal agreement to extend until the 5th May 2014 the statutory period (within which no appeal can be lodged) has been received from the agent

Whilst the agent's submission covers a range of matters your officer can now confirm as follows:-

- That there is substantive evidence in the form of a detailed procurement and construction programme which has been examined by your officer and it supports the contention that it is simply impractical to expect the developer to have completed any substantial works to the houses themselves within 18 months.
- That given that market conditions can changes significantly and thus the viability of schemes can change significantly the scale of the development, which at up to 139 dwellings is not small scale, it would be appropriate to require the developer to enter into an agreement that secures a trigger for a reappraisal of the scheme's viability both on the failure to achieve "substantial commencement" within 18 months and should the development be built in phases. The proposals set out in the LPAs position within the report represent an appropriate means of doing this with both aspects being covered.
- Whilst the applicant refers to the RICS Guidance Note on Financial viability in planning, and that GN does advise that reappraisal mechanisms should only be considered in exceptional circumstances it is important to note that the Council is only seeking a reappraisal in the event of these particular triggers being met. Your Officer is not seeking a post development appraisal or overage arrangement which the RICS GN expressly advises against – as development risk at time of implementation cannot be accounted for in respect of the inevitable uncertainty of undertaking a development. In short your Officer's position is that the RICS GN has been taken into account.
- One of the key principles of the developers contributions SPD is that payments should be received so that the needs and impacts of new development are addressed before they arise, but in that context the Education Authority have confirmed that they would have no objection to 50% of the education contribution being received prior to the commencement of the development and 50% prior to the commencement (rather than the occupation of the 31st dwelling
- That the committee report on the application gave no consideration to the possibility that there be a contribution towards offsite provision with respect to affordable housing, as opposed to on site provision. However given the very low rate of affordable housing provision that is being considered in this case, and the broad policy position set out in the affordable housing SPD (that on site provision should normally be sought) it is considered that it would be inappropriate to seek a financial contribution towards off site provision, and the affordable housing provision should all be on site

- That the agreement still needs to include some form of trigger that would require a reappraisal should completions per annum fall below a level
- That there is no in principle objection to the use of an indices based approach to an appraisal if triggered although the details will need careful consideration
- That any reappraisal should be on an upward only basis

As members will appreciate Section 106 agreements are a matter of negotiation between the parties, and given their complexity officers inevitably are required upon occasion to interpret the broad spirit of the resolutions made by the Planning Committee. Your officer is seeking authority to deal with these matters on the basis of the broad principles set out above

The second and third recommendations within the report indicate that your officer will advise members as to how long it is appropriate to allow for the agreement to be entered into, failing which he would have a delegated authority to refuse the application, unless he considered it appropriate to allow more time.

The period of time to be given should it is suggested be that which will provide time within which the agreement can be drafted, completed by the various parties (which in this case include not only the applicant, but also a mortgagee, the County Council and the Borough Council), have regard to the possibility (although considered most unlikely in this case) that planning circumstances may change, and that setting a long date would not enable any such change in the interim to be considered.

Whilst the applicant has suggested 5th May as an appropriate date, it is recommended that having regard to date when the application was received (10th October), the period of time which has elapsed since the original resolution (7th January) (but also the promptness with which the agent raised concerns and the time it has taken to bring this matter to committee) that a further six week period be permitted i.e. up until 22nd April 2014. Recommendations 2) and 3) are accordingly amended to reflect this.

'The Plan For Stafford' – consultation on 'Main Modifications.'

Purpose :

To update members on progress of the Stafford Borough Local Plan, as a neighbouring authority, and to set out a suggested response as part of their Main Modifications consultation exercise.

Recommendation :

That the Borough Council support the Schedule of Main Modifications prepared by Stafford Borough and responds by stating that it has no further comments to make.

Reason :

The Plan for Stafford (Local Plan) has undergone a robust public examination process and the issues raised by the Borough Council formed part of the examination process. The Inspector's initial findings set out identify some changes to the Plan, in a Main Modifications document. The Schedule for Main Modifications has been formally published for consultation. All representations must be received by 12 noon on Thursday 20 March 2014.

1.0 **Background**

- 1.1 Stafford Borough Council has almost reached the end of preparing a new Local Plan, known as 'The Plan for Stafford' which directs where new development will take place across its area, describes what changes will occur and identifies how places will be shaped in the future. Once the Local Plan has been adopted Stafford Borough Council intend to bring forward a Site Allocations Development Plan Document.
- 1.2 Between 2008 and 2013 Stafford Borough Council carried out a series of consultation and information gathering exercises in preparation of the Plan. The Borough Council submitted joint representations with Stoke-on-Trent City Council to some of these and has contributed towards the plan through Duty to Co-operate meetings.
- 1.3 The remaining issues raised at the Publication/Submission stages and taken forward by your officers into the Examination of the Plan were:
 - To support the Plan for Stafford Borough with regard to their **development strategy** including the housing and employment requirements;
 - To suggest a rewording to Policy 'Stafford Town 1 (vii)' and the relevant paragraph in Policy Stone 1 – Stone Town with regard to **office development in town centres** to make it clear that B1 (a) office developments should be subject to sequential assessment;

- To object to **Policy C6 – Provision for Gypsies, Travellers and Travelling Show People** as the policy refers to the provision for pitches being made in-line with subsequent evidence base documents ('successor documents') not currently in the public domain.
- 1.4 Following submission of the 'Plan for Stafford' to the Planning Inspectorate last summer a public examination stage commenced from 20 August 2013. Hearing Sessions took place in October 2013. Your officers participated in the Communities hearing session and challenged the evidence in relation to the Gypsy and Travellers Policy.
- 1.6 The Planning Inspector published recommendations for further main modifications in December 2013. Following these recommendations Stafford Borough Council produced a Schedule of Main Modifications and these are now subject to consultation. The proposed modifications are intended to address soundness issues raised by the Inspector and address matters arising from representations throughout the Examination process
- 1.7 Stafford Borough Council has also produced a Schedule of Additional Modifications which are minor changes to the plan and considered immaterial in nature and therefore do not affect the soundness of the Plan.
- 1.8 The Schedule for Main Modifications has been formally published for consultation. All representations must be received by 12 noon on Thursday 20 March 2014. **However it is not an opportunity to repeat or raise further representations about the Plan for Stafford Borough.** Following the close of this stage all representations will be forwarded to the Inspector for consideration in preparing his Final Report. The Main Modifications document can be accessed via the following link: <http://www.staffordbc.gov.uk/modifications>

2.0 Schedule of Main Modifications

- 2.1 Key legal and soundness issues for the Borough Council as set out within the Schedule of Main Modifications are set out below:
- 2.2 Duty to Co-operate
The Inspector's initial findings indicate that Stafford Borough Council has met the requirements of the Duty to Co-operate in terms of maximising the effectiveness of the plan-making process and actively co-operating and engaging constructively with the relevant bodies in relation to sustainable development.
- 2.3 Development Strategy
The Inspector's initial findings suggest that the overall development strategy is sound although individual elements of the strategy such as the level of housing around Stone was substantially challenged at the Examination. With regard to the development strategy the inspector suggests that the proposed level of housing provision in Spatial Principle 2 (500 dwellings/year; 10,000 dwellings 2011 – 2031) is sufficient to meet the objective assessment of market and

affordable housing requirements for Stafford Borough, based on recent household projections and other evidence.

- 2.4 However the Inspector suggests that the proposed proportion of new housing allocated to Stafford and Stone does not precisely reflect the potential for new housing development at Stone, as shown in the scale of development at the proposed Strategic Development Locations (SDLs) and the current level of commitments. The inspector suggests it also overstates the likely level of housing development to be completed at the SDLs around Stafford during the current Plan Period.
- 2.5 A broader distribution of 70% (7,000 dwellings) at Stafford and 10% (1,000 dwellings) at Stone is suggested to better reflect the current and likely future provision of committed and proposed housing developments. This is a change from the published strategy of 7,200 dwellings at Stafford and 800 dwellings at Stone.
- 2.6 **Proposed Modifications MM9 – MM12 (and other associated changes) reflect proposed amendments to the Development Strategy. In particular Spatial Principle 4 is amended to show a development split of 70% to Stafford and 10% to Stone and the table at Paragraph 6.54 amended to update the housing completions and the housing requirements for Stone and Stafford. The text has also been amended to identify that settlement boundaries and sites will be established in a Site Allocations Development Plan Document.**
- 2.7 In addition to the proposed phasing of housing Stafford Borough Council had proposed a moratorium on new housing once housing completions got above 25% of the proposed distribution. The Inspector has suggested in his interim report that there is little in the National Planning Policy Framework which supports this approach, where the main emphasis is on stimulating house building and managing growth in sustainable locations. Furthermore the Inspector suggests that there is insufficient evidence to justify the imposition of a housing moratorium which involves complex calculations and assumptions about delivery and has stated that it is an unsound element of the submitted Plan.
- 2.8 In view of this Stafford Borough Council have agreed with the Inspector and do not carry this forward within the Schedule of Main Modifications.
- 2.9 Apart from the overall amount of new housing at Stone one of the other main issues was the phasing of further housing at the town after 2021. Stafford Borough Council proposed the phasing policy with the justification that this was to avoid any adverse impact on the regeneration strategy of North Staffordshire. Your officers contributed to a paper produced by Stoke-on-Trent City Council in support of Policy Stone 1, which outlined the regeneration strategy and the progress in housing delivery and distribution.
- 2.10 However, while the Inspector recognises that the adopted Core Spatial Strategy aims to stem out migration, particularly from the City of Stoke-on-Trent, he considers that migration to Stafford Borough has been a feature of demographic

trends in the past and is likely to continue under the strategy of the submitted Plan for Stafford Borough. The Inspector considers that new housing at Stone is a sustainable element of the Plan, with a strong housing market, and in these circumstances there seems to be insufficient justification to delay such development on the grounds that it *may* adversely affect the North Staffordshire regeneration strategy, including the part relating to The Potteries. The Inspector has not concluded this aspect of the Plan is unsound but has asked Stafford Borough Council to consider amending this element of the Plan as the potential harm to the regeneration strategy can be addressed on a site-by-site basis, subject to on-going monitoring, with sound evidence needed to defer specific developments.

2.11 **Proposed Modifications MM1, MM8 and MM51 reflect the above recommendations and DELETE references to ‘phasing of housing and employment areas within Strategic Development Locations until after 2021’. References to the implications of new development affecting the North Staffordshire conurbation’s urban regeneration initiatives have also been deleted.**

2.12 Office Development

Stafford Borough Council had previously agreed to changes to the office development policies, outside of the examination process, these references are maintained within the Main Modifications document.

2.13 **Proposed Modifications MM21 and MM44 continue to support amendments to Policy Stafford 1 and Stone 1 with regard to B1(a) office development only being permitted on employment sites outside the town centres if it can be proved, through a sequential assessment, that proposed development cannot be located with the town centre or edge of centre sites..**

2.14 Gypsy and Travellers

Together with Stoke-on-Trent City Council the Borough Council objected to the wording of Policy C6 Provision for Gypsies, Travellers and Travelling Show-people, because of its reliance upon successor documents which would not be subject to formal public consultation under the statutory planning process. Concern was also raised regarding the lack of involvement in the production of a Gypsy and Traveller Accommodation Needs Assessment (GTAA). As a consequence of these objections Stafford Borough attempted to reach a compromise during the hearing sessions by rewording Policy C6 and this is now treated as a ‘main modification.’ It is disappointing, however, that the Inspector has not provided any specific guidance on the independent evidence produced by Stafford Borough Council, or wording of the Policy C6 at this stage. This is in spite of both the Borough Council and Stoke-on-Trent City Council making an initial informal joint response to Stafford Borough in November 2013, sustaining the original challenge. The challenge made by both authorities at the Communities hearing session in relation to the methodology of the assessment has therefore not been addressed and there is no proposal to change to the number of pitches required in Stafford Borough as set out in Policy C6. This

remains as a total of 44 pitches as informed by their own independent 2013 study.

- 2.15 There may be further information set out within the Inspector's Final Report. However, at this stage the Inspector does acknowledge that Stafford Borough Council has confirmed its commitment to reviewing the Gypsies and Travellers Needs Assessment in association with adjoining authorities (including the Borough Council). Members are advised that the preparation of the Joint Local Plan will involve the preparation of the a new Gypsies and Travellers Needs Assessment for the Borough (replacing the North Staffordshire Housing Market Area Gypsy and Traveller Accommodation Needs Assessment published in December 2007) and officers from Stafford Borough Council have stated that they are willing to collaborate in its production together with the City of Stoke-on-Trent. This will help to ensure that cross boundary issues on this matter are appropriately addressed.

3.0 Conclusion

- 3.1 The Stafford Local Plan has undergone a robust public examination process and the issues raised by the Borough Council formed part of the examination process. The Inspector's initial findings identify some changes to the Plan, all of which have been taken into account in the Main Modifications document.
- 3.2 It is not considered prudent to raise any further issues as part of the Main Modification consultation. It is important that neighbouring authorities have up to date and sound development plans and it is in the best interests of Newcastle-under-Lyme Borough Council to support the approach taken and help ensure that the Plan for Stafford Borough can be adopted. It is, therefore, proposed that the Borough Council support the Schedule of Main Modifications prepared by Stafford Borough Council and states that it has no further comments to make on the Plan for Stafford Borough at this time.

4.0 Next Steps

- 4.1 Consultation on the Main Modifications of the Local Plan for Stafford Borough runs until 12 noon on 20th March 2014. Subject to member agreement it is proposed to submit a consultation response to 'The Plan for Stafford Borough – main modifications and if feasible this will be submitted jointly with Stoke-on-Trent City Council before the deadline on 20 March 2014.
- 4.2 Borough Council officers will continue to engage with Stafford Borough Council particularly with regard to the update of the Gypsy and Traveller Accommodation Needs Assessment and the development of their Site Allocations Development Plan Document.

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