

The Application is for outline planning permission for residential development up to a maximum of 138 dwellings. Details of the point of access onto the site have been submitted for approval, with all other matters of detail (appearance, landscaping, layout and scale) reserved for subsequent approval. An indicative layout plan has been submitted for information.

The proposed access utilises the existing access to Hamptons Metal Merchants off the access road serving the adjoining existing residential development, known as Milliner's Green, off Keele Road.

The site measures 4.99 hectares and is located to the south-east of Walley's Quarry landfill site. The site is within the Newcastle Neighbourhood as designated on the Local Development Framework Proposals Map and is within the urban area. Trees within the site are protected by Tree Preservation Orders Nos. 2 and 85.

The 13-week period for the determination of this application expired on 17th March 2015, but the applicant has since agreed to extend the statutory period to 30th April, and would be willing to extend it to at least the 26th May meeting

RECOMMENDATION

Subject to the Environmental Health Division confirming that noise and contamination/landfill gas issues can be addressed through the imposition of appropriate conditions REFUSE for the following reasons:-

- 1. Odour arising from the adjoining landfill site is highly likely to adversely affect the living conditions of the occupiers of the proposed development and it is not considered that this can be addressed through appropriate mitigation.**
- 2. In the absence of any odour mitigation measures that would suitably address the concerns expressed at 1, the applicant has failed to demonstrate that the development would not unduly restrict or constrain the activities permitted to be carried out at the adjoining waste management facility and the implementation of the Waste Strategy, contrary to policy.**
- 3. In the absence of an assessment of any risks to the development proposal by past coal mining activity, based on up-to-date coal mining information, the applicant has failed to demonstrate that the site is safe and stable to accommodate the proposed development, contrary to the NPPF.**
- 4. In the absence of a secured planning obligation and having regard to the likely additional pupils arising from a development of this scale and the capacity of existing educational provision in the area, the development fails to make an appropriate contribution towards primary school provision.**
- 5. In the absence of a secured planning obligation the development fails to make an appropriate contribution towards the provision of affordable housing which is required to provide a balanced and well functioning housing market.**
- 6. In the absence of a secured planning obligation the future maintenance and public access to the required public open space to meet the needs of the development has not been secured.**

Reason for Recommendation

It is considered that odours arising from the adjoining landfill site will have an unacceptable impact on the living conditions of the occupiers of the proposed development as odours could not be addressed through appropriate mitigation measures. As such it could unduly restrict or constrain the activities permitted or allocated to be carried out at any waste management facility and the implementation of the Waste Strategy, contrary to local and national policy.

In addition the applicant has failed to demonstrate that the site is safe and stable to accommodate the proposed development bearing in mind the coal mining legacy of the area.

Whilst the Environmental Health Division have raised objections it is anticipated that, following submission of additional information, noise, contamination and landfill gas issues can be suitably addressed through mitigation measures that could be the subject of conditions of a planning permission.

The development would result in additional pressure on limited primary school places of the schools whose catchment area it is located, and would place additional demands on off-site public open space unless the future maintenance and access to the open space on site is guaranteed. Both could be secured by means of planning obligations.

A planning obligation is also required to secure affordable housing within this development in accordance with policy. No obligations, in the form of a unilateral undertaking are "on the table" at the time of writing and indeed the applicant has submitted a viability assessment that indicates that the development would not be viable with such contributions.

Overall it is considered that the adverse impacts arising from granting planning permission (i.e. the odours arising from the adjoining landfill site having an unacceptable impact on the occupiers of this development and the introduction of residents unduly restricting or constraining the permitted operation of the landfill site) would outweigh the benefits of the provision of housing land; the benefits to the local economy; the relocation of the existing scrap yard within the site; and the social benefits of providing family and affordable houses (even assuming that the full 25% provision is made which may not be the case) and as such there is no presumption in favour of this development.

Proposed Statement as to how the Local Planning Authority has worked with the applicant in a positive and proactive manner in dealing with this application

The Local Planning Authority worked in a positive and proactive manner in dealing with this application and in considering the application, advising of issues of concern and the need to provide additional supporting information, within a reasonable period, however it is considered that the applicant has been unable to overcome the principal concerns arising from the proposal.

KEY ISSUES

As indicated above the application is for outline planning permission for up to 138 dwellings. The details of the vehicular access into the site, which is the existing scrapyard access, are submitted for approval at this stage, but all other matters of detail are to be considered at a later date. An indicative layout plan has, however, been submitted in support of the application. This plan shows a circular internal access with a number of cul-de-sacs off that road. A central green/play area is shown and a landscaped buffer is shown on the boundary of the site to the adjoining landfill site.

In recognition of the absence of objections of the Environment Agency on flood risk and the conclusions of the submitted Ecological Scoping Report that the site has low ecological value and that there is no evidence of the presence of protected species, it is considered that the main issues for the Local Planning Authority to address are as follows:-

- Principle of development
- Visual Impact
- Residential amenity (air quality, odour, noise, pests)
- Impact of the development on the adjoining landfill site.
- Highway safety
- Contamination and landfill gas
- Coal mining legacy issues
- Planning obligations necessary to make the development policy compliant
- An assessment overall of whether or not any adverse impacts of the development significantly and demonstrably outweigh its benefits, when assessed against the policies in the NPPF taken as a whole.

Principle of residential development on this site

The application lies within the urban area and as such policies within the adopted Development support the principle of residential development on the brownfield (currently developed) element of the site. The site, however, is partially a greenfield site and as such the proposal does not fully comply with the Development Plan which seek to target residential development towards brownfield land.

The Local Planning Authority is, however, currently unable to demonstrate a five year supply of specific, deliverable housing sites (plus an additional buffer of 20%) as required by paragraph 47 of the Planning Policy Framework (NPPF). It is therefore accepted that paragraph 49 of the NPPF applies to this application as follows:

“Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”

The application has therefore to be assessed against the NPPF including paragraph 14 which states:

*“At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking.*

...For decision-taking this means (unless material considerations indicate otherwise):

- *...where...relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.”*

Consideration will be given to whether there are any adverse impacts arising from granting planning permission that would outweigh the benefits of the provision of housing land under the headings below and a conclusion reached at the end of the report regarding the acceptability of the proposed development in principle.

Visual Impact

The site is prominent in views when approaching the site from the Keele direction along the A525, along Cemetery Road and Gallowstree Lane. The existing open field would be lost to development however it is considered that the visual impact arising would not justify refusal and could in part be mitigated by appropriate landscaping adjacent to the site boundary.

The redevelopment of the scrapyard, an integral part of the proposal, will be visually beneficial to the area. Whilst it is noted that the land levels will be increased as part of the mitigation measures relating to contamination it is not considered that this will result in a visually unacceptable residential development.

The design and layout of the development will need to be considered carefully at reserved matters stage but there is no basis upon which to conclude that the site could not accommodate residential development which would be acceptable in visual terms.

Residential Amenity (air quality, odour, noise, pests)The application is supported by a number of Assessments relating to residential amenity particularly arising from the site's proximity to the adjacent landfill site.

It is known that the landfill site has planning permission until 2042 and that the levels of the fill, as permitted, will exceed the existing land level prior to the final restoration of the site thereby giving rise to amenity issues for a considerable period of time. It is therefore necessary to consider the impact of the landfill site on residential amenity as it is at present and as it will change as ground levels within the landfill site increase as waste is deposited.

The Air Quality Assessment submitted has concluded that there will be no air quality concerns arising as a consequence of the development. It does acknowledge, however, that when the filling of the adjoining waste site takes place at ground level the impacts are predicted to be potentially significant. It goes on to conclude that the existing tree belt and proposed planted bund indicated on the illustrative layout will partially mitigate the impact of the landfill on the living conditions of the occupants of the development. It highlights that the development does not represent sensitive development any closer than existing development where similar impacts are predicted. In addition there will be ongoing mitigation measures to address odour at the landfill site.

The application submission acknowledges that mitigation measures proposed, the landscaped bund, will not fully address the impact of the landfill in later stages of its life. In addition it is not considered that identifying that there are already residential properties (which are the adjoining residential development to the north west of the site referred to in the planning history section below) that will similarly be affected by the landfill site as those proposed, justifies the introduction of up to a further 138 households adversely affected. Whilst it is acknowledged that the operators of the landfill site have been, and will continue, to address the odours arising from the development as far as they can, that the EA indicate that it is highly likely that the residents will be affected by odour nuisance should be noted.

The Environmental Health Division has sought the comments of a consultant on the issue of odour. The advice received is that, drawing on the evidence provided by the applicant in the submitted documentation, there is sufficient concern to object to the proposal. There is a likelihood that on occasion odour will be a problem, as acknowledged by the applicant, and due to flaws in the submission the impact may be greater than predicted but even at the levels the applicant predicts the occupiers of the development would be unacceptably affected by odours. The introduction of residents close to the landfill site will compromise the operator's ability to comply with the permit that they operate under. This is contrary to the policies and guidance listed below. The advice received is that there are no appropriate conditions that could be applied to the application site which would address such concerns. For those reasons, the consultant recommends that the application should be refused

The Noise Assessment submitted with the application concludes that the development will be affected by traffic noise but that this could be addressed through mitigation. In addition noise modelling has been undertaken to assess the impact of noise arising from the operation of the adjoining waste site. The Environmental Health Division does not consider that the impact of noise has been appropriately assessed and that a further assessment should be carried out and that it is demonstrated, before a decision is made, that noise modelling is representative of the activities taking place now and in the future and that the operation of the landfill site will not be unacceptably constrained throughout its lifetime by the residential development proposed. Whilst it is anticipated that the noise impact can be addressed satisfactorily, it is not possible to identify appropriate mitigation without the further assessment, although it is anticipated that this will be submitted before the Committee meeting.

The submitted pest assessment concludes that it is highly unlikely that pest problems will arise as a result of developing the proposed site. In addition it states that the small number of pests in the area, such as gulls and other birds, flies and rodents found in the vicinity of the site are unlikely to amount to nuisance and cause loss of amenity such as it will give rise to complaints. The Environmental Health Division has questioned whether the report properly addresses fly infestation but has not raised any objections to the proposal on this ground.

Impact of the development on the adjoining landfill waste site

Policy 2.5 of the recently adopted Waste Local Plan states that the Waste Planning Authority (the County Council) will not support proposals that would unduly restrict or constrain the activities permitted or allocated to be carried out at any waste management facility, or restrict the future expansion and environmental improvement of existing operational waste management facilities.

Paragraph 120 of the NPPF states that to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. Paragraph 8 of the National Planning Policy for Waste states that local planning authorities should ensure that the likely impact of proposed, non-waste related development on existing waste

management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.

The proximity of the proposed development, for the reasons outlined above, raises issues of residential amenity and unless the Authority is satisfied that the development can be made acceptable through amendment or mitigation, which is not the case, it must be concluded that the proposal will prejudice the implementation of the Waste Strategy contrary to local and national policy. The County Council's comments can be interpreted as an objection on these grounds given the conclusion that has been reached.

Whilst the proposal will also result in the removal of an existing waste site, the scrap yard, as indicated in the relevant planning history section below, permission has been given for this facility to relocate to Chesterton.

Highway safety

The development is accessed from the existing residential development which gains access onto the wider highway network via a traffic light controlled junction. The submitted Transport Assessment indicates that the junction has sufficient capacity to accommodate the additional traffic from the development and that the scheme will have little or no impact on the local network. The Highway Authority has raised no objections to the application.

Notwithstanding the representation received that parking should be approved at this stage it is considered that the site could accommodate adequate parking to meet its needs and therefore details of layout, including parking, could not be required at this stage.

Coal mining legacy

The Coal Authority advise that the site falls within the defined Development High Risk Area, and that their records indicated within the application site and surrounding area there are coal mining features and hazards which need to be considered in relation to the determination of this planning application, specifically the presence of a recorded mine entry and recorded geological faults/fissures across part of the site.

In light of this and in accordance with the NPPF it is for the applicant to demonstrate to the satisfaction of the LPS that the application site is safe, stable and suitable for development. The application fails to this .

Contamination and Landfill Gas

The Environmental Health Division and the Environment Agency have expressed concerns regarding contamination and landfill gas. The Environmental Health Division have indicated that the submitted site investigation works are insufficient to adequately identify the potential risks posed by the scrap yard and the adjoining landfill site to the future residents of the site. They say it is necessary to demonstrate through appropriate modelling, given the landfill site is only at 35% of its capacity, potential risks from migration of landfill gas and without such information it is not possible to consider what remediation is necessary. Following a meeting with the applicant's advisors, however, it is now anticipated that the Environmental Health Division will be in a position to recommend conditions that would appropriately mitigate any adverse impacts in response to further information that is to be submitted.

Planning obligations to make the development policy-compliant

The development would result in additional pressure on limited primary school places of the school within whose catchment area it is located and in the absence of a financial contribution, that can only be secured by a planning obligation, such adverse impacts would not appear to be appropriately mitigated against. A planning obligation is also required to secure affordable housing within this development and to secure the future maintenance and management of the areas of landscaping and

open space within the site. It is considered that the contributions that are sought comply with the tests in the CIL Regulations and as such would be lawful.

The applicant has very belatedly submitted a viability assessment that indicates that the development would not be viable with such contributions. Given the lateness of the submission of the information relating to viability it has not been possible to obtain an independent assessment and as such it is not possible, at this time, to advise whether the applicant's conclusion are correct. If the Committee was minded not to refuse the principle of residential development on this site, then the appropriate step would be to obtain an independent assessment of the scheme's ability in financial terms to make such contributions (which would take some weeks), and for the matter to come back to the Committee to be considered in the light of that independent assessment.

Do the adverse impacts of the development significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole?

Odours arising from the adjoining landfill site have been identified as being likely to have an unacceptable impact on the occupiers of this development. It is acknowledged that the operators of the landfill site are addressing odours, and will continue to do so as part of their permit, this will not eliminate odours at all times over the considerable operational lifetime of the landfill site. In addition the introduction of residential properties that will be affected by odours from the landfill site could unduly restrict or constrain the permitted operation of the landfill site. In addition the applicant has so far failed to demonstrate that the site can be safely developed taking into consideration the coal mining legacy that affects the site. These are matters of considerable weight when taken together and outweigh the benefits of the provision of housing land; the benefits to the local economy; the relocation of the existing scrap yard from the site; and the social benefits of providing family and affordable houses (even assuming that the full 25% provision is made) when assessed against the policies in the NPPF taken as a whole.

Policies and Proposals in the approved development plan relevant to this decision:-

Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 (CSS)

Policy SP1: Spatial Principles of Targeted Regeneration
Policy SP3: Spatial Principles of Movement and Access
Policy ASP5: Newcastle and Kidsgrove Urban Neighbourhoods Area Spatial Policy
Policy CSP1: Design Quality
Policy CSP3: Sustainability and Climate Change
Policy CSP5: Open Space/Sport/Recreation
Policy CSP6: Affordable Housing
Policy CSP10: Planning Obligations

Newcastle-under-Lyme Local Plan 2011 (NLP)

Policy H1: Residential development: sustainable location and protection of the countryside
Policy T16: Development – General Parking Requirements
Policy C4: Open space in new housing areas.
Policy N12: Development and the Protection of Trees
Policy N17: Landscape Character – General Considerations
Policy IM1: Provision of Essential supporting Infrastructure

Staffordshire and Stoke-on-Trent Joint Waste Local Plan 2010-2026 (JWLP)

Policy 2.5 – The location of development in the vicinity of waste management facilities.

Staffordshire and Stoke-on-Trent Minerals Local Plan 1994-2006 (MLP)

Policy 6 – Mineral Safeguard Areas

Other material considerations include:

Staffordshire Minerals Local Plan 2015-2030 (draft for consultation)

Policy 3 – Safeguarding Minerals of Local and National Importance and Important Infrastructure National Planning Policy and guidance

National Planning Policy Framework (March 2012)
Planning Practice Guidance (March 2014)
National Planning Policy for Waste (October 2014)
DEFRA Odour Guidance for Local Authorities (2010)

Supplementary Planning Documents/Guidance

Developer Contributions SPD
Affordable Housing SPD
Space around dwellings SPG
Newcastle-under-Lyme and Stoke-on-Trent Urban Design Guidance SPD

North Staffordshire Green Space Strategy (adopted 2009)

Staffordshire County Council Education Planning Obligations Policy approved in 2003 and updated in 2008/09

Relevant Planning History of the adjoining now developed site to the north-east

99/00341/OUT Outline planning permission granted for residential development – 6 November 2000

02/01107/REM Details of the means of access to the housing development and scrapyard – refused but subsequently allowed on appeal in May 2003

03/00790/REM Details of 280 houses and apartments – appeal lodged against failure of the Local Planning Authority to determine the application within the appropriate period. Council resolution 21 September 2004 that had the appeal not been lodged it would have granted the application subject to various conditions. Appeal allowed 27 July 2005 and costs awarded against the Authority.

Relevant Planning History of the application site

The County Council granted planning permission to relocate the scrap yard on part of the application site to Holditch House, Holditch Road in 2013 (County Council's reference N12/03/2018 W).

Views of Consultees

The **Environmental Health Division** objects to the application on noise and contamination grounds, however it considers that the objection can be overcome by the applicant undertaking the following:

- A revised contamination study
- An assessment of potential noise impacts from the adjacent landfilling activities, carried out in accordance with BS4142:2014
- Revised noise modelling using the proposed site layout and the plant items which are likely to be used at the landfill which takes account of the comments detailed herein.

However in light of the advice from Ricardo-AEA (consultants) concerning the odour impact of the landfill on the development and the impact on the remaining landfilling created by introducing new sensitive receptors, the Division recommends refusal of this application on odour grounds.

The **Highway Authority** have no objections subject to conditions including prior approval of full details of the access, submission of a Travel Plan and approval of a Construction Management Plan.

The **Landscape Development Section** comment that the site is protected by Tree Preservation Orders Nos. 2 and 85 and that they have no objections in principle subject to the retention of the existing mature trees around the perimeter and the inclusion of new planting where appropriate is

supported. More of the properties could face onto the central play area. The buffer planting and road way separation to the A525 shown on the indicative layout is supported.

A Section 106 obligation is requested to secure the long term maintenance and public access to the open spaces on the site.

The **County Education Authority** indicates that the development falls within the catchments of Friarswood Primary School/Hassell Community Primary School/St Giles and St George's CofE Academy and NCHS - The Science College. A development of this size could add 29 Primary School aged pupils, 21 High School aged pupils and 4 Sixth Form aged pupils. The Primary Schools are projected to be full for the foreseeable future (the other schools have capacity) as such they request a contribution towards Primary School provision only which amounts to £319,899 (29 x £11,031).

The **Environment Agency** objects to the proposed development because the proposed development is located within 50m of a currently non-hazardous landfill site which is known to be producing landfill gas. This represents an unacceptable risk to the proposed development and they therefore recommend that planning permission is refused on this basis in accordance with advice set out in the NPPF.

The EA make reference to flood risk and drainage, and groundwater and contamination and request that contaminated land conditions are imposed should the Council decide to grant planning permission.

The County Council as the **Minerals and Waste Planning Authority** raise no objections to the proposed development subject to the Council being satisfied, having obtained confirmation from its own Environmental Health Officer and Environment Agency that:

- There would be no unacceptable risks from pollution to any occupant of the proposed development as a result of the proximity to the neighbouring waste management facility; and
- The proposed development would not constrain the continued operation of the neighbouring waste management facility, or the timely restoration of the former quarry.

The **Coal Authority** raise fundamental concern as the site falls within the defined Development High Risk Area and objects as the required Coal Mining Risk Assessment Report or equivalent has not been submitted. As such the applicant has failed to demonstrate that the application site is safe and stable to accommodate the proposed development.

The views of Waste **Management, Housing Policy, Silverdale Parish Council**, and the **Newcastle South LAP** have been sought but they have not responded by the due date. As such it is assumed that they have no comments on the application.

The **Lead Local Flood Authority** has no objections subject to conditions to secure appropriate design to address surface water run-off.

Representations

Four letters of objection have been received, including a representation from the **Thistleberry Residents Association** and one on behalf of the operator of the adjoining landfill site, raising the following concerns:-

- The development of the site abutting the adjoining landfill site, thereby abandoning the established buffer-zone based approach which has been applied, would be unjustifiable in planning terms.
- The benefits of the development are limited and would not outweigh the harm arising from a development that is incompatible with the adjoining landfill site.
- The Transport Report incorrectly refers to the A575 and it is unclear how the journey details have been calculated.
- There is only one access to this and the existing Persimmon development.
- Flooding occurs on the A525 outside the Parkway and near to the entrance of the site.

- Parking should not be left until the reserved matters stage as it should be known what parking provision is being made to ensure that it is adequate given that parking on the adjacent housing development is problematic.
- The submitted information suggests that noise levels on application site would be unacceptably high and such noise levels may not take into the workings of the adjoining landfill site when it reaches ground level.
- There might be a limit to the height of bunds on safety grounds when the working level of the landfill site raises which will affect mitigation.
- The flood risk assessment recommends a swale pond leading to concern about deep water on site.
- Drainage into the existing stream course will increase flooding that occurs nearby.
- The application should not be determined until a detailed plan has been provided as to what is to happen to the trees on site. Vegetation and trees should not be removed to accommodate the development.
- The development of the scrap yard is supported but the loss of the amenity value of the green field would have a great adverse impact on the neighbourhood.
- The proposed 25m off set limit to the infill site is not adequate. Already there are problems on the Persimmon site which has a 100m off set.
- If the significant number of empty house are taken into account it may be found that Newcastle more than achieves a 5 year supply of housing land.
- There are many issues that have been highlighted within the submitted reports that demonstrate why the site shouldn't be developed.
- The development should be subject to Environmental Impact Assessment screening.
- The submission does not fully take into account the socio-economic impacts of the development notably impact on school provision.
- The Air Quality and Odour Assessment is not available. (This document is now available to view).
- Serious consideration should be given to the likelihood of complaints during the lifetime of the adjacent landfill site and whether it is appropriate to introduce further sensitive receptors when there are continuing odour complaints.
- The only location for the drainage attenuation pond is in a location within 2m of potentially contaminated made ground and as such is inappropriate.
- In recognition of the recommendations of the geo-environmental report that asbestos monitoring is undertaken around the perimeter of the site a planning condition should be imposed if minded to approve.
- The Design and Access Statement indicates that the dwellings will be constructed on existing ground levels which is contrary to the recommendations of the geo-environmental report which recommends cover of the former scrapyard area. Such alterations in ground levels could impact on the highways layout and Townscape and Visual Impact Assessment.
- Insufficient information has been provided to determine that the application can be built within the parameters applied for.
- The proposal does not include the required 25% affordable units.
- The suggested path to Keele Road would require the removal of a mature hawthorn hedgerow and would be better to the north where it would avoid the narrow path to the west of the existing scrapyard.
- The development and the adjoining Persimmon Estate should be designated with a 20mph limit.

A letter in support of the application, in part, has been received making the following comments:-

- The brownfield part of the site will be improved by the removal of the scrapyard and replacement by executive type houses in keeping with or better than the Hampton Court development.
- The greenfield element should remain as agricultural land as it, and the school playing fields, provide a green barrier between the Borough and University Science Park.
- The greenfield site was the scene of extensive ground-works by the National Coal Board some years ago to remedy subsidence problems.
- The site includes the former Field House farm and buildings and there should be a provision for an archaeological watching brief on this part of the site.

Applicant/agent's submission

The application is supported by the following;

- Planning, Design and Access Statement
- Ground Investigation Report
- Noise Impact Assessment
- Expert Report: Pest and Nuisance potential of proposed residential site.
- Arboricultural Report and Arboricultural Implications Report
- Transport Assessment
- Landscape and Visual Appraisal
- Flood Risk Assessment
- Statement of Community Involvement
- Viability Assessment

The application documents are available for inspection both at the Guildhall, and at www.newcastle-staffs.gov.uk/planning/1400948OUT

Background Papers

Planning Policy documents referred to
Planning files referred to

Date report prepared

10th April 2015