

MASTERPLAN REPORT 20/01281/MPLAN

Applicant: Macleod Construction

Masterplan to PDA 10/15 for residential development as identified in the adopted Argyll and Bute Local Development Plan 2015

Land At Imeraval, Port Ellen, Isle Of Islay: PDA 10/15

1. Summary

Imeraval lies to the west of Port Ellen and is designated in the current adopted Local Development Plan (LDP) as having potential for low density housing development with a 25% requirement for affordable housing. Under these designations, a Masterplan is required as part of the determination of any planning application. This Masterplan has been submitted in advance of any further planning applications in order to establish the principle of development on the PDA at this density.

A Masterplan has previously been approved under reference 15/02954/MPLAN. A history of planning applications on the site is summarised below and how they relate to the delivery of the Masterplan.

The applicant is proposing 93 units across the entire area. This is calculated as:

- Phase 1 - 18 units (as per planning approval 13/02862/PP)
- Phase 2 - 8 units (outwith the PDA boundary under planning approval 18/01264/PP)
- Phase 3 - 10 units (as per planning approval 19/00182/PP)
- Phase 4 - 20 units
- Phase 5 - 20 units
- 5 private plots along the southern boundary, and
- 12 private plots on the adjacent land holding to the east
- Total – 93 (85 within the PDA)

This is broken up with a low density approach (11 units per hectare as defined in the LDP) to the southern portion of the site and an indication of similar low density on the adjacent land not owned by the applicant but within the PDA. A portion of the site has been delivered already by West Highland Housing Association (WHHA), phases 1, 2 and 3, but at a density not consistent with the expectation of the LDP. However, since the adoption of the LDP it has come to light that there is a lack of properties on the island and affordable units in particular. This has become a significant issue with some local key services such as the airport struggling to recruit personnel from off the island. In order to assist in overcoming this issue officers are minded to support the Masterplan as submitted which increases the numbers from the previous approval from 64 to 85.

Access is maintained as per the existing arrangements. The applicant is proposing an access into the adjacent portion of the site and officers are satisfied that, in land use terms, the adjacent land can still be delivered. It will be up to the relevant parties to agree the finer details of the access arrangements.

Landscaping is consistent with the existing Masterplan approval. A 6m deep tree strip will be planted along the northern boundary. Additionally there are areas of informal green space adding to the general mix. The applicant is proposing to maintain the stone walling currently throughout the site and officers are satisfied with this approach. The footpath along the front of the site will connect down to the distillery. Significant improvements have already been made to the UC17 Port Ellen to Oa public road including footpath arrangements along the majority, widening in key places and vegetation management.

The applicant intends to connect to public services. A SuDS scheme will be required and secured through subsequent planning applications. This approach is consistent with that undertaken thus far.

There have been no objections from consultees. Two objections have been received from third parties. One of these is the owner of the adjacent land holding but their concerns are addressed through the submission. The applicant has undertaken a community consultation event via the community council.

The Masterplan is considered in detail below.

2. RECOMMENDATION

Officers consider that the components of the proposed Masterplan are considered to be compatible with the envisaged development of PDA 10/15. It is accepted that the Masterplan might require some refinement in some locations but this can be secured via the submission of planning applications. It is considered that there is sufficient detail to assess the proposed development of the PDA and that it meets with the expectations and requirements of the LDP and technical working note on Masterplanning.

It is therefore recommended that Members approve the current Masterplan submission.

3. ASSESSMENT

PDA 10/15 at Imeraval is designated in the adopted Argyll and Bute Local Development Plan (LDP) for a development of low density, high amenity detached housing.

PDA's are areas identified by the Council where they can contribute to economic development and environmental improvement and where a comprehensive approach to prospective development is warranted in order to avoid unplanned piecemeal development.

PDA's are defined in the LDP as areas of land within which opportunities may emerge during the period of the LDP for infill, rounding off, redevelopment or new development. Such opportunities, as were identified, were not fully resolved at the time of the adoption of the development plan, which requires constraints to be overcome in terms of the 'mini development brief' accompanying these PDA's before development opportunities within the PDA area can be realised and be supported by the LDP. It is standard practice to require a Masterplan approach when considering development within such designated areas. Masterplans help the Council assess at an early stage in the development process, the interrelationships of layout, design, access, existing transport infrastructure and sustainable modes of travel, landscape and ecology, open space provision and integration of a proposed development with existing communities.

The Scottish Government most commonly refers to Masterplans as being '*a plan that describes and maps an overall development concept, including present and future land use, urban design and landscaping, built form, infrastructure, circulation and service provision. It is based upon an understanding of place and it is intended to provide a structured approach to creating a clear and consistent framework for development*' (PAN 83). The Scottish

Government endorses the use of Masterplanning in general, but considers that it is especially useful for large sites and in areas / sites which are going to undergo substantial change, have multiple users, or are sensitive in environmental or landscape terms.

The council's Technical Working Note on Masterplanning requires a consultation period of a minimum of 21 days for public comment. In this instance we have received two objections and these are assessed below.

Should Members approve the submission the Masterplan will be regarded as a material consideration that will provide a context for deciding any future planning application within the masterplan area. It should be noted however, that all Masterplans are indicative and not prescriptive in nature.

4. CONSULTATIONS

ABC Roads, 18/08/2020 – No objection subject to conditions to be attached to any future permission.

ABC Environmental Health, No response.

Scottish Water, 12/08/2020 – No objection.

West of Scotland Archaeology Service, 20/08/2020 – No objection subject to a condition attached to any future permission.

5. PUBLICITY

The Masterplan was advertised in The Oban Times 13th August 2020 expiry 10th September 2020.

Community consultation event undertaken by the applicant in January 2020.

6. REPRESENTATIONS

There are two objections received in relation to this Masterplan and these are summarised below.

Stephen Rogers, Carraig Mhor, Imeraval, Port Ellen, Islay (18/08/2020)
Stewart Wood on behalf of Mr Alex MacLean, Maison Dubois, Ewanfield, Crieff, Perthshire (31/08/2020)

The proposal will dwarf the village of Imeraval.

Comment: The site is identified as a PDA within the settlement boundary of Port Ellen. The density is higher than that of Imeraval as the expectation is to release land for housing and deliver much needed homes on the island. However, the density increase is only on part of the site and there are elements that retain a density akin to Imeraval.

The road infrastructure is insufficient to support this scale of development especially with increased tourist traffic to Kilnaughton Bay and Port Ellen Distillery.

Comment: Roads and Amenity Services has not objected to the proposal. Significant levels of road safety improvements have been secured over the years including footpath provision and road widening.

There is a question over the strategy of house building on the island.

Comment: The LDP sets out the level of housing envisaged for the island. This is informed by a Housing Needs Assessment. The LDP is available for public comment prior to adoption. It is recommended that if further details are required then contact should be made with the council's Housing and Policy teams.

Residents have already suffered years of building works and associated disturbance.

Comment: This is noted, but the site is considered suitable for housing. The level of disturbance during normal work hours is not a material consideration in the determination of this Masterplan.

No provision for electric car charging points.

Comment: This can be addressed during the determination of planning applications. It is not required for the consideration of a Masterplan which sets out a general scope of direction for future delivery across the site.

The site is good arable land which will be needed for future food supplies.

Comment: The land is graded as 5.1 according the Scottish Soils website. This land Class relates to land capable of use as improved grassland. It is reasonable quality land but not large enough nor part of such a significant portion of arable land as to have any impact on food supplies. The site has been designated for housing purposes in the LDP. It is not considered that future food supplies will be a significant concern given the advancements in farming technology.

Concerns that the proposal will land lock and prevent the delivery of the adjacent land not owned by MacLeod's.

Comment: The Masterplan clearly shows an access point into the adjacent land holding. It is not for MacLeod's to facilitate development on this site. The Masterplan only requires to show that the remainder of the PDA won't be sterilised as a result of these aspirations. It will be up to the owner of the land to negotiate a private arrangement to ensure access but officers are satisfied that the remainder of the PDA will not be sterilised by this Masterplan proposal. Access is clearly shown on the submitted plans. It is understood that the adjacent land owner accepts the Masterplan in principle but is keen to ensure access into the site is secured.

Full details of the this representation can be view on the Council's website www.argyll-bute.gov.uk

7. ASSESSMENT

List of all Development Plan Policy considerations taken into account in assessment of the masterplan.

'Argyll and Bute Local Development Plan' Adopted March 2015

LDP STRAT 1 – Sustainable Development

LDP DM 1 – Development within the Development Management Zones

LDP 3 – Supporting the Protection Conservation and Enhancement of our Environment

LDP 5 – Supporting the Sustainable Growth of our Economy

LDP 8 – Supporting the Strength of our Communities

LDP 9 – Development Setting, Layout and Design

LDP 10 – Maximising our Resources and Reducing our Consumption

LDP 11 – Improving our Connectivity and Infrastructure

Local Development Plan Schedule

'Supplementary Guidance to the Argyll and Bute Local Plan 2015' (Adopted March 2016)

Natural Environment

SG LDP ENV 1 – Impact on Habitats, Species and our Biodiversity
SG LDP ENV 7 – Water Quality and the Environment
SG LDP ENV 8 – Green Networks
SG LDP ENV 10 – Geodiversity
SG LDP ENV 11 – Protection of Soil and Peat Resources

Landscape and Design

SG LDP ENV 14 – Landscape

Historic Environment and Archaeology

SG LDP ENV 20 – Impact on Sites of Archaeological Importance

General Housing Development

SG LDP HOU 1 – General Housing Development Including Affordable Housing Provision
SG LDP HOU 2 – Special Needs Provision in Housing Developments

Housing Greenspace

SG LDP HOU 3 – Housing Green-Space

Planning Gain

SG LDP PG 1 – Planning Gain

Sustainable Siting and Design

SG LDP Sustainable – Sustainable Siting and Design Principles

Resources and Consumption

SG LDP SERV 1 – Private Sewage Treatment Plants & Wastewater Systems
SG LDP SERV 2 – Incorporation of Natural Features / SuDS
SG LDP SERV 3 – Drainage Impact Assessment
SG LDP SERV 5(b) – Provision of Waste Storage & Collection Facilities within New Development
SG LDP SERV 9 – Safeguarding Better Quality Agricultural Land

Addressing Climate Change

SG LDP Sustainable – Sustainability Checklist

Transport (Including Core Paths)

SG LDP TRAN 1 – Access to the Outdoors
SG LDP TRAN 2 – Development and Public Transport Accessibility
SG LDP TRAN 4 – New & Existing, Public Roads & Private Access Regimes
SG LDP TRAN 5 – Off-site Highway Improvements
SG LDP TRAN 6 – Vehicle Parking Provision

List of all other material planning considerations taken into account in the assessment of the application, having due regard to Annex A of Circular 4/2009.

- Scottish Planning Policy (SPP), 2014
- Creating Places- A Policy Statement on Architecture and Place for Scotland
- Designing Streets – A Policy Statement for Scotland
- Planning History

- A&B – Larger Housing Developments Design Guide
- A&B Technical Working Note: Masterplanning
- Statutory/Non-Statutory Consultee Comments
- The Argyll and Bute Proposed Local Development Plan (LDP2), November 2019
- Islay Strategic Housing Overview, September 2019

A. Development Plan Context

The Masterplan applies to land within the boundary of PDA 10/15 as defined in the adopted Argyll and Bute Local Development Plan 2015. The PDA proposals for this specific location are an expression of the Local Development Plan's objectives for the site and advocate the development of a low density, high amenity residential scheme consisting of detached houses. The LDP, however, contradicts these aims somewhat in that it also requires a 25% affordable housing component of the development which would introduce a higher residential density to part of the site which would normally be expressed by a development of smaller dwellings, usually in a terraced, semi-detached and/or flatted configuration.

The proposal represents a significant uplift in the density aspirations of the LDP. Low density is described as 11 units per hectare whilst this Masterplan provides for 17 per ha. Despite this the vast majority of units are affordable which is welcomed by officers. Those areas of private housing are significantly lower than that of the affordable. RSL housing will, by its nature, offer a higher density given the units tends to be smaller and made up of semi-detached, terraced and flats. Although the density is higher than specified in the LDP the recent Islay Strategic Housing Overview identified a need for housing. Those areas within settlements identified as allocations and PDAs are the most sustainable.

In this regard the proposal is a departure from the aspirations of the LDP. There is a greater demand for affordable housing than initially envisaged on the island at the time of writing the LDP and the delivery of this is best placed on allocations and PDAs given access to transport modes, settlement boundaries etc. This is detailed further below.

B. Settlement Strategy

The Masterplan site is located wholly within the defined settlement boundary of Port Ellen and covers a contiguous site area of 4.956 hectares, this being the whole of PDA 10/15 and sharing the same PDA boundaries.

Under Policy LDP DM 1 – *Development Within the Development Management Zones* in key rural settlements such as Port Ellen, encouragement is given to development serving a local community of interest, including 'medium scale' development on appropriate infill, rounding-off and redevelopment sites. Medium scale development is defined in the Local Development Plan as development of between 6 and 30 dwellings. In exceptional cases, 'large scale' development may be supported if it helps to counter population decline in the area, would help to deliver affordable housing, or else meet a particular local housing need. Large scale development is defined in the LDP as development exceeding 30 dwelling units.

Under Policy SG LDP HOU 1 – *General Housing Development Including Affordable Housing Provision*, there is a general presumption against 'large scale' housing development in key rural settlements. Exceptions apply where there is a deliberate attempt to counter population decline, to develop affordable housing, or else meet a particular housing need. However, within PDA's these constraints are removed and the issue becomes the assessment of the site based criteria. There is, therefore, a general presumption in favour of this development in terms of the 'Argyll & Bute Local Development Plan'.

C. Location, Nature and Design of Proposed Development

The Masterplan / PDA site has an overall area of 4.956 hectares and is currently open grazing land, split into two fields of roughly equal area with a gently undulating topography and no distinguishing geographical or topographical features. The masterplan area is bounded by substantial stone dyke walls with minor public roads immediately beyond to the south and west and by agricultural post and wire fences to the north and east / south-east. Immediately north of the masterplan area is a continuation of open agricultural and croft land with the buildings and site of Port Ellen Distillery bounding the site to the east and south-east.

The Masterplan / PDA area is within the ownership of separate parties. West Highland Housing Association own phases 1, 2 and 3 whilst MacLeod Construction Ltd own phases 4 and 5. The private plots along the southern edge are owned by Mr Jim Porteous whilst the remaining area to the east is owned by Mr A MacLean.

The submitted Masterplan has been prepared by CMA Architects acting on behalf of WHHA and MacLeod Construction Ltd. The remaining landowners are aware of the Masterplan and have been notified. It is understood that Mr Porteous is supportive whilst Mr MacLean is supportive in principle but has submitted concerns relating to access. This is summarised in section 6 above.

It is worth noting that 26 homes have previously been completed at Imeraval through Phases 1 & 2 and a further 10 (phase 3) were due to commence on site in 2020. WHHA considered its development proposals for the Strategic Housing Investment Programme period up to 2022, and Islay, and in particular Imeraval, is included given the high demand for this area. Phase 3 and Phase 4 at Imeraval are in the current approved SHIP listed under 'Additional Potential Projects' which will see a further 30 units delivered by 2022

The submitted masterplan indicates a phased potential development as per the following:

- Phase 1 - 18 units (already built)
- Phase 2 - 8 units (already built)
- Phase 3 - 10 units (already built)
- Phase 4 - 20 units
- Phase 5 - 20 units
- 5 private plots along the southern boundary, and
- 12 private plots on the adjacent land holding to the east
- Total – 93 (85 within the PDA)

Of these phases 1 to 5 are proposed by WHHA totalling 76 units made up of:

- 3 bed 5 person villas 32
- 2 bed 4 person villas 28
- 1 bed cottage flat 16

The total number of affordable units totals 76 out of a total of 93. This equates to some 70% provision of affordable units and would be a wholly welcome increase departure from the 25% specified in the LDP. However, the recent Islay Strategic Housing Overview, September 2019 identifies significant pressures for housing on the island accessible to first time buyers and people moving to the island. The proposal will assist in addressing population decline and provide much needed housing to address the backlog of demand. It is worth noting that officers have received a number of enquiries from key employers on the island detailing the problems with recruitment unless the candidate already has housing on the island. This is clearly having an impact on population and the ability of businesses to grow.

The remainder of the Masterplan area would comprise a much lower density of private free-market housing and an indicative layout has been submitted showing the remainder of this land set out for a development of 17 low density, high amenity detached houses to be brought forward in an anticipated five along the southern boundary east of phase 1 and another 12 in the adjacent land holding to the east. Access is clearly maintained by an access through phase 4.

Whilst the higher density component of the overall development was not envisaged under the LDP written statement that accompanies the designation of PDA 10/15 it is considered inevitable that this site would, by necessity, include a higher density component given the conflicting policy within the Development Plan that requires a minimum of 25% affordable housing provision across the site. Affordable housing would almost always present itself as small residential units occupying more constrained plots and leading inevitably to terraced development, semi-detached development and flatted units. Whilst the affordable housing provision could, in theory, be provided in a scattered fashion throughout the total development area and thus remove the perception of a higher density 'cluster' of development, the reality is that the need for such housing has been identified and officers are satisfied that the requirement for new housing should outweigh the low density specified in the LDP.

Provision of both casual and equipped play space has been considered in the development of the masterplan in accordance with the provisions of LDP policy SG LDP HOU 3 – *Housing Green-Space*. This policy requires that any residential development of 20 dwelling units or more are required to provide a minimum of 12 square metres of casual play space per unit plus a minimum of 6 square metres of equipped children's play space per unit.

Supplementary Guidance SG LDP HOU 3 requires developers to provide casual open space and equipped children's play space including provision for under 5 year olds for developments of 20 dwellings units or more.

Equipped play areas will be designed and installed in accordance with the LDP. The calculation of open space has been calculated as follows:

- Casual open space (green) $68 \times 12 \text{ m}^2 = 816 \text{ m}^2$
- Equipped play space (hatched green) $68 \times 6 \text{ m}^2 = 408 \text{ m}^2$

Equipped Play Areas will be delivered as follows:

- Play Area A upon completion of Phase 4 170 sq.m Equipped & 460 sq.m Casual
- Play Area B upon completion of Phase 5 240 sq.m Equipped & 480 sq.m Casual

Total 410 sq.m 940 sq.m.

D. Natural Environment

Policy SG LDP ENV 1 – Impact on Habitats, Species and our Biodiversity of the LDP states that development which impacts on wildlife sites or other nature conservation interests, including sites, habitats or species at risk will be assessed on its acceptability balanced with social and economic considerations. It also notes that enhancements to nature conservation issues are encouraged. There are no protected sites within the masterplan area.

Furthermore, policy SG LDP ENV 8 – *Protection and Enhancement of Green Networks* seeks to encourage developments to contribute towards the creation, retention and improvement of Green Networks within and surrounding the Main Towns. Although Port Ellen is not listed as a Main Town it is positive that the proposed retention, improvement and extension of the dry stone walling along with the strategic landscaping along the north boundary will help to create habitat and a green network for a variety of species.

The Masterplan specifies that although there are no nature designations covering the site they are minded to undertake pre-commencement walkover surveys for the presence of ground nesting birds and other species. Appropriate mitigation will be provided at that time and discussed with planning officers.

E. Landscape Character

The acceptability of the current proposal will be largely dependent on the successful integration of the development in its landscape context through design, layout and landscape planting. The proposal shows significant elements of 'green space' and it is recommended that these should be enhanced with a greater amount of new landscape planting, particularly along the northern boundary of the masterplan area in order to 'soften' the appearance of the development from the long views of the site available when travelling north to south along the public road.

It is important to retain as much of the existing stone dyke boundary walls as possible. These walls should be relocated where necessary and set back behind any access visibility splays and the widened public road carriageway (see Section H below). This retention/replacement can be secured by planning conditions attached to any future planning applications.

F. Historic Environment

The masterplan area does not form part of the Port Ellen conservation area and lies outwith its borders by a distance of approximately 800 metres. There are no buildings or substantial structures within the site and therefore no listed buildings or scheduled ancient monuments.

The majority of the masterplan / PDA does, however, fall within a wider 'archaeological consultation trigger' (ACT) which relates to the discovery of a Norse cross-slab in 1838 and located within a small uncultivated field some 200 metres west of Port Ellen Distillery. The field in question forms the eastern part of the masterplan area and the ACT covers all or the substantial whole of the PDA.

The West of Scotland Archaeology Service (WOSAS) have raised concerns regarding the potential for further buried archaeological remains within the masterplan area, particularly within the ACT but also in the land surrounding it due to the largely arbitrary nature of the consultation zone boundaries.

Whilst there is no objection to the principle of development as indicated by this masterplan on grounds of material harm to the historic environment, WOSAS have strongly recommended that no planning permissions be granted until such time as a preliminary archaeological investigation has been carried out in order to assess the likelihood of the presence of buried remains within the masterplan area and in order to properly evaluate how any development might impact upon the archaeology of the area and how any such remains might be best preserved and/or recorded.

A planning condition can be used to secure these works through the submission of planning applications. The use of such a planning condition would require an archaeological evaluation of the site and afford an opportunity to properly record/remove any important remains, whilst not being a precursor to the granting of planning permission and thus allowing other works towards the provision of further phases of the development to proceed without undue delay.

G. Affordable Housing

The provision of 25% affordable housing within PDA 10/15 is specified within Chapter 8 of the adopted Argyll and Bute Local Development Plan 2015.

The vast majority of the Masterplan is being taken forward by West Highland Housing Association Ltd who currently have a sizable stock of affordable housing on Islay. The development of phases 1 to 5 has been supported in principle by the RSL in terms of SHIP funding. There is a recognised housing need in Port Ellen which the council is keen to support.

The proposed affordable homes aim to be recognised as amongst the most resource and energy efficient homes in Scotland; meeting the 2016 Scottish Building Regulations and seeking the highest levels of sustainability.

H. Road Network, Parking and Associated Transport Matters.

The masterplan shows the whole site being served via a single access point from the public road that runs along its southern boundary. This single access is included within the current planning application for the first phase of the development and will be provided to an appropriate adoptable standard in order to serve the remainder of the site.

It is proposed to widen the C17 Port Ellen to Mull of Oa road to 5.5 metres along the southern frontage of the masterplan site. There will also be a 2 metre wide footway provided adjacent to this road which will be extended along the frontage through the development of the various phases.

Adequate vehicle parking and turning will be provided to meet the Council's required development standards.

The council's Area Roads Engineer has raised no objection subject to a set of conditions being attached to any future planning application approval. These are detailed below:

- The private house plots must be served by a road that connects directly to the main development road,
- The road serving the private plots needs to have a turning head for a commercial vehicle,
- The proposed development to be served by a road to adoptable standard,
- Street lighting,
- Requirement for SuDS,
- A 2m wide footway to be provided along the frontage of the application site,
- Road name signs, and
- Hardstandings and grit bins to be provided.

The applicant has provided a link road into the adjacent site to the east and sufficient room exists within the site to provide this. It might require some amendments to green spaces and garden areas but it can be provided. It will be for the owner of the adjacent site to agree the provision of this access into their site. Officers are satisfied that sufficient room exists but do recognise that the indicative layout may need to be altered to fully accommodate a road of adoptable standard.

When an application is submitted for the relevant phase of works then officers will seek appropriate amendments to layout to provide sufficient access. However, the delivery of this road to the relevant standard will be up to the interested parties and not necessarily for WHHA or MacLeod Construction Ltd.

I. Water and Sewage Capacity.

The proposed development of the Masterplan area will be served by the existing public water supply and the mains sewage system. Scottish Water have confirmed that there are currently

no capacity constraints or off-site infrastructure issues that would prevent the development being brought forward in the manner proposed.

J. Conclusion

PDA's are defined in the adopted LDP as areas of land within which opportunities may emerge during the period of the LDP (5 to 10 years) for infill, rounding-off, redevelopment or new development. Such opportunities as were identified were not fully resolved at the time of the adoption of the plan, which requires constraints to be overcome in terms of the 'mini development brief' accompanying these PDA's before development opportunities within the PDA area can be realised and be supported by the LDP.

The Council supports developments that contribute to the economic vitality of the area. Both the Scottish Government and the Council places the delivery of sustainable economic growth as its number one objective.

The Masterplan, whilst indicative, gives all interested parties and statutory consultees sufficient detail to assess the future development of the site. Assessed against Development Plan policy and other material considerations the components of the phased housing development scheme are considered to be compatible with PDA 10/15 and the potential constraints to development acknowledged within its accompanying schedule. As such the masterplan is considered fit for purpose. It is recommended that the masterplan be approved and endorsed as a material consideration in the assessment of any future planning applications on the site.

As has been previously clarified. The proposed Masterplan is also in accordance with emerging LDP2 which is a material planning consideration at this time.

IMPLICATIONS

Policy:	None
Financial:	None
Personnel:	None
Equal opportunities:	None

Author of Report: David Love

Date: 8/10/20

Reviewing Officer: Tim Williams

Date: 8/10/20

Fergus Murray

Head of Development and Economic Growth