

SW/0089/2012 – Section 73 application to continue development without complying with conditions 3, 21 and 24 of planning permission SW/10/1436 at Ridham Dock Road, Iwade, Sittingbourne, Kent

A report by Head of Planning Applications Group to Planning Applications Committee on 12 February 2013.

KCC/SW/0089/2012– Section 73 application to continue development without complying with conditions 3, 21 and 24 of planning permission SW/10/1436 at Ridham Dock (MR. 921 674)

Recommendation: Permission BE GRANTED subject to conditions.

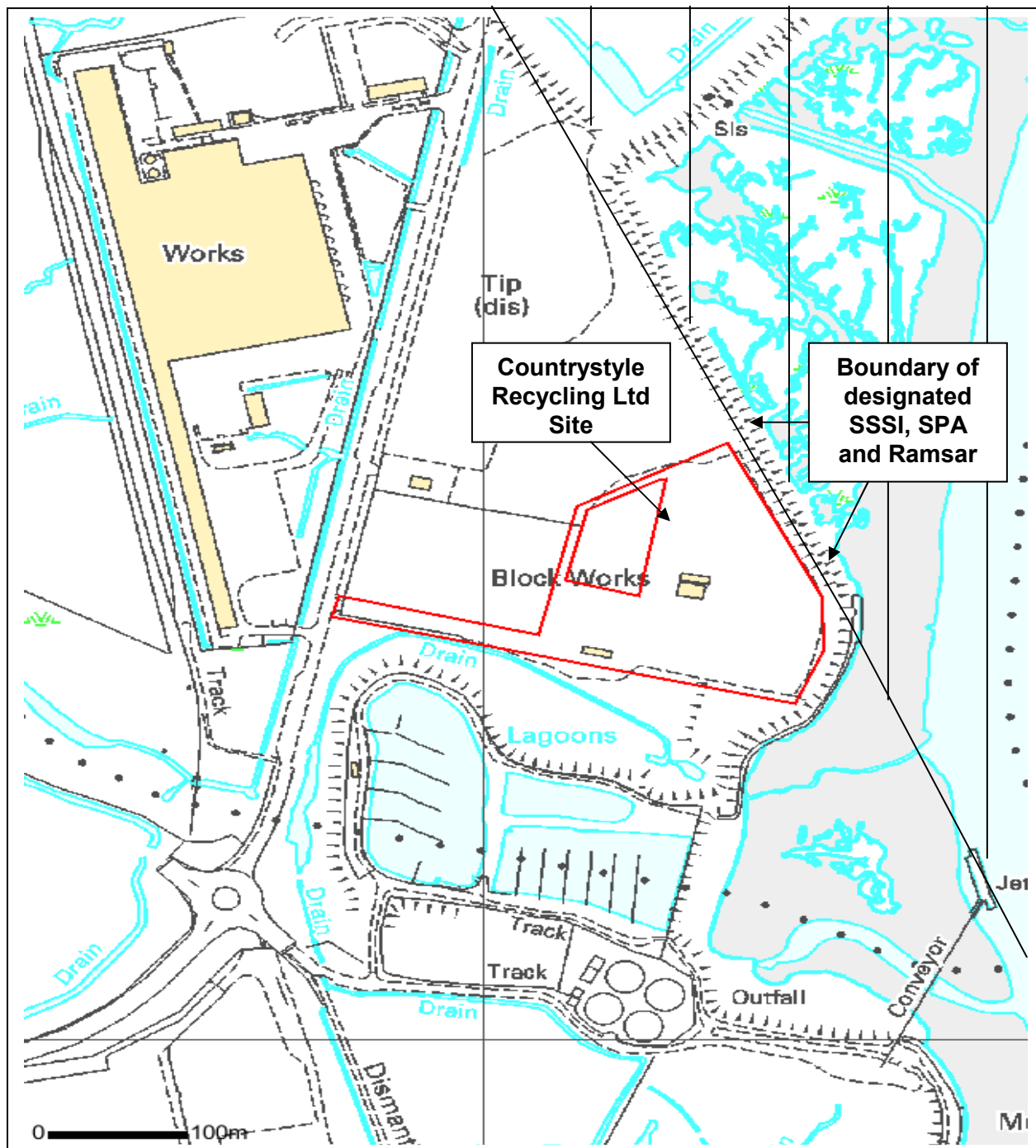
Local Member: Mr A Willicombe & Mr Whiting

Classification: Unrestricted

Background and Site Description

1. Planning permission was granted in 2006, for a material recovery facility (MRF), in-vessel composting facility (IVC) and the continuation of secondary aggregate recycling operations at the Countrystyle Recycling Limited (CRL) site, Ridham Dock, under planning consent reference SW/05/1392. A Section 73 planning application was later permitted which included, amongst other matters, a variation of opening hours (permitted under reference SW/10/1436). This s73 permission allows for waste deliveries and transportation of materials off site between 0530 and 2000 hours on Monday to Sunday and Public Holidays (excluding Christmas Day, Boxing Day and New Years Day). However no operations other than the processing of compostable material within the in-vessel system and processing of materials within the MRF building shall take place outside these hours.
2. The site itself lies some 2km north of Kemsley, 2.1 km to the east of Iwade and 1.2km to the east of the A249. It lies close to habitats which form part of the Swale SSSI, SPA and the Medway Estuary and Marshes Ramsar site respectively. The closest residential properties (Kemsley Fields) are approximately 1.2km from the site. A site location plan is included below.
3. Following a routine monitoring visit to the site in November 2011, a number of planning issues were identified, which resulted in a report to the January 2012 Regulation Committee for Members endorsement on appropriate action. Two retrospective planning applications were subsequently submitted in order to regularise the matter. One of which was for the implementation of a concrete pad. This was granted planning permission by Members at the July 2012 Planning Applications Committee.
4. The second application, which is the subject of this report, relates to a number of alterations to the approved site layout along with some process changes at the site.

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Site Location Plan

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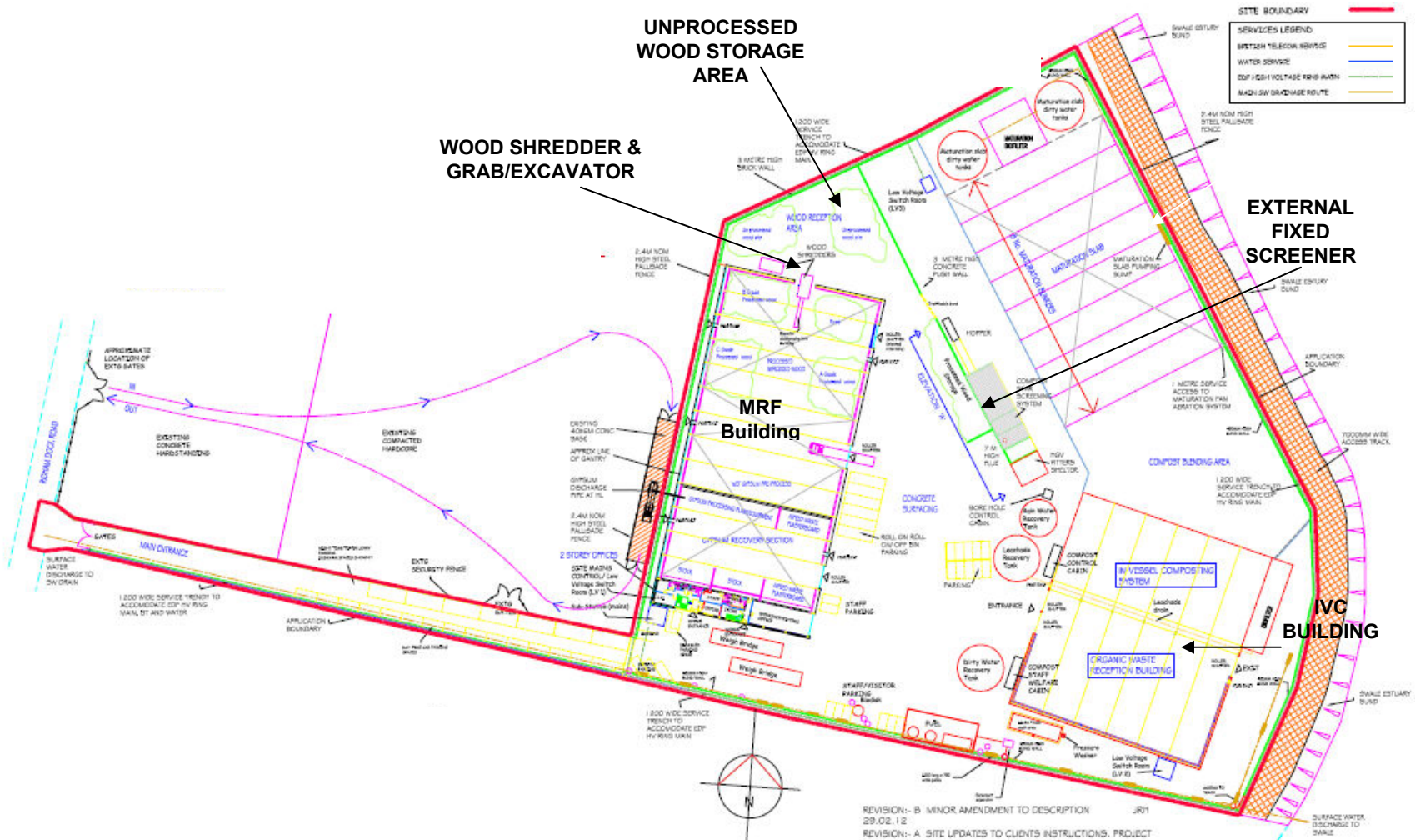
Proposal

5. The applicant has submitted a section 73 planning application which is in essence twofold. Firstly it seeks a number of minor alterations to the approved site layout which comprise:
 - HGV fitter's shelter adjacent to a fixed compost screener
 - Construction of a 3m high outdoor bay to store processed wood;
 - Day time car parking spaces along the southern side of the site access road;
 - Vehicle washdown and refuelling area to the south of the organic waste reception building; and
 - Changes to MRF elevations (i.e. additional doors)
6. Secondly, a variation is sought to enable some external changes to the wood processing and compost screening operations. These are summarised as follows:
 - Use of wood shredders and grab/excavator outside the MRF Building
 - Stockpiling of unprocessed wood outside of the MRF
 - Location of fixed compost screener and mobile screener outside the IVC building
7. The proposed site layout is shown overleaf.

Background to proposed changes to the wood shredding activity

8. Whilst the minor layout changes are a result of day to day operational efficiencies, the reason for the changes to the wood processing on site is linked to a previous project. Permission was granted by Members of the Planning Applications Committee in May 2010 under reference SW/09/894. This allowed for the implementation of a small scale biomass plant, in partnership with Bioflame Limited, using low grade wood waste as feedstock. This facility was to be located within the existing MRF building at the site. In order to accommodate the new biomass plant and the processing of wood waste, the applicant sought to extend the MRF building to ensure that all operations associated with this activity could take place within a fully enclosed building. Whilst the applicant commenced wood processing on site, Bioflame Limited, who were the main drivers for the biomass plant technology, went into liquidation and the project did not go ahead as permitted. The applicant at the time considered that wood shredding and processing could take place at the site, albeit that the MRF building was not extended as had been previously planned. In order to ensure as much of the process as possible is contained within a building, the applicant therefore operates a 'part in part out' activity which is explained further below.

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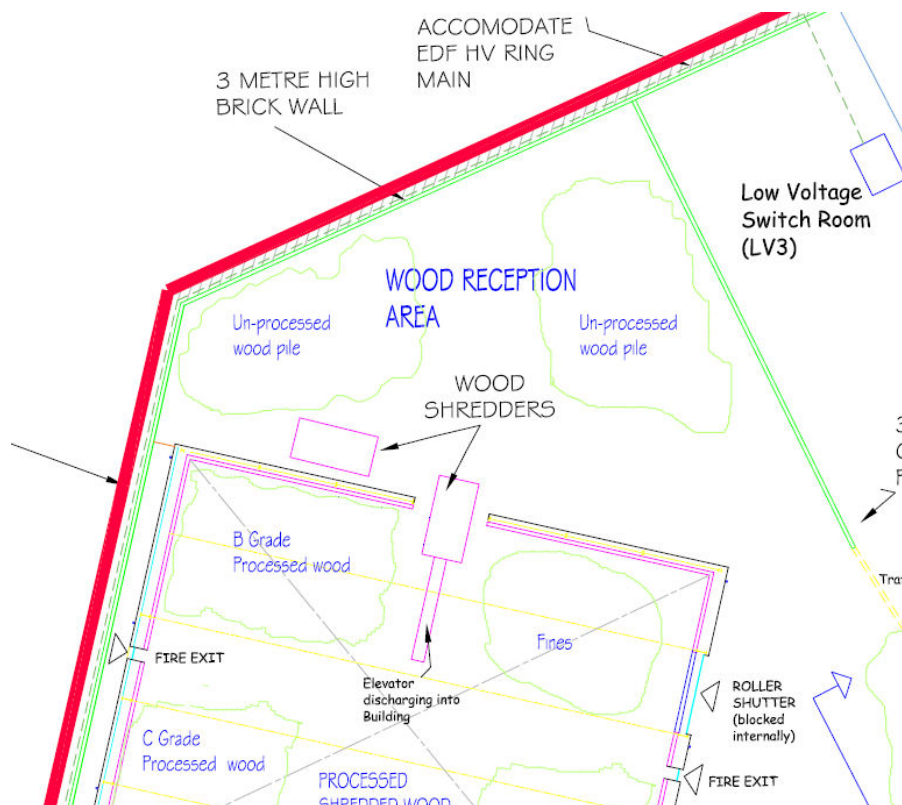


Proposed Site Layout

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Process

9. Unprocessed wood waste is brought to the site and stored externally within a designated area to the north west of the site. Wood is loaded by grab machine into the 'input' end of a shredder and discharged at the output end which is located within the existing MRF building (as illustrated on the extract from drawing number 11.09B01 B below).



10. In terms of the planning status, whilst a planning permission exists to process wood at the site, originally this was intended to have taken place within the MRF building once extended. Bioflame's withdrawal from the biomass project meant that the MRF building was not implemented as had been originally intended and that the site operator has continued to process wood within the confines of the space available to him. The operator does however seek to significantly reduce the wood throughput from the currently permitted (under SW09/894) 30,000 to 10,000 tonnes per annum.
11. In addition to the external wood shredding activity the other main external element to what is proposed as part of this s73 applications is the use of both an fixed and mobile screener which is located outside the existing IVC building.

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12. In terms of the minor changes sought in relation to the site layout, these elements relate largely to operational efficiency and the need to ensure staff car parking is provided without impact on operational procedures. Whilst I do not consider these to be fundamental in themselves, I do consider that the changes to external processes (i.e. the wood processing activity and the external screener) could give rise to noise, dust and odour impacts on nearby designations.

Planning Policy Context and Government Guidance

13. The key National and Development Plan Policies most relevant to the proposal are summarised below:
14. **National Planning Policy Framework, March 2012** - The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. It is committed to ensuring that the planning system does everything it can to support economic growth whilst ensuring that development is sustainable. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.
15. In particular Para 122 of the Framework states: *Local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively.*
16. **Planning Policy Statement 10 (PPS10): Planning for Sustainable Waste Management** – Underlines the importance of planning for and consenting the necessary number and range of facilities in order to ensure that adequate provision is made for the future management of our waste.
17. The key aim of moving waste management up the 'waste hierarchy' forms the underlying objective of national policy. The proximity of waste disposed and 'self sufficiency' are also expected to represent the fundamental key to securing such objectives to ensure that communities take responsibility for their own waste.
18. Through more sustainable waste management, moving the management of waste up the 'waste hierarchy' through the descending order of reduction, re-use, recycling and composting, using waste as a resource of energy and only disposing of waste to landfill as a last resort, government aims to break the link between economic growth and the growth of waste.

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19. **Waste Strategy 2007** – aiming to reduce waste by making products with fewer natural resources, breaking the link between economic growth and waste growth; products should be re-used or their materials recycled.
20. **South East Plan (2009)** – The most relevant policies are: W3 (Regional Self Sufficiency), W4 (Sub-Regional Self Sufficiency), W5 (Targets for Diversion from Landfill), W6 (Recycling) W8 (Waste Separation), W17 (Location of Waste Management Facilities), CC1 (Sustainable Development), CC2 (Climate Change), CC3 (Resource Use), CC4 (Sustainable Design and Construction), NRM4 (Sustainable Design and Construction), NRM5 (Conservation and Improvement of Biodiversity), NRM9 (Air Quality).
21. It should be noted that the South East Plan remains part of the development plan although the Government's intention to abolish regional spatial strategies is a material consideration and the weight given to it is a matter for the decision maker.
22. **Kent Waste Local Plan (1998)** – The most relevant saved policies are: W3 (Locational Criteria), W6 (Consideration of need), W9 (Waste separation and transfer), W18 (Noise, Dust and Odour), W19 (Groundwater protection), W21 (Nature Conservation), W22 (Provision for adequate access arrangements), W25 (Plant and Buildings) and W31 (Visual Impact and Landscaping).
23. **Swale Borough Local Plan (2008)**

Policy SP2: In order to provide a robust, adaptable and enhanced environment, planning policies and development proposals will protect and enhance the special features of the visual, aural, ecological, historical, atmospheric and hydrological environments of the Borough and promote good design in its widest sense. Development will avoid adverse environmental impact, but where there remains an incompatibility between development and environmental protection, and development needs are judged to be the greater, the Council will require adverse impacts to be minimized and mitigated. Where a planning decision would result in significant harm to biodiversity interests, which cannot be prevented or adequately mitigated against, appropriate compensation measures will be sought.

Policy E12: Sites designated for their importance to biodiversity or geological conservation.

Policy B2: Providing for new employment.

Policy B10: Ridham as an existing committed employment site.

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24. Emerging Policy

Kent Minerals and Waste Development Framework – Minerals and Waste Core Strategy: Strategy and Policy Directions Consultation (May 2011) – The strategic objectives for the Waste Core Strategy seek to increase amounts of Kent's waste being re-used, recycled or recovered and promote the movement of waste up the waste hierarchy by enabling the waste industry to provide facilities which enable a major reduction in the amount of Kent's non-hazardous waste being disposed of to landfill. It also seeks to provide opportunities for the generation of renewable energy for use within Kent through energy from waste.

Waste Sites Plan (Preferred Option Consultation May 2012) – it identifies the site as having existing planning permission for an in-vessel composting facility, a materials recycling facility, aggregates recycling and waste wood combined heat and power plant. It gives support to the development of the site subject to the nature and scale of development being similar to that of the current planning permissions.

25. Consultations

Swale Borough Council: Objections are raised on the grounds of odour generated from existing composting activities. The Borough Council state the following:

"The Borough Council's Environmental Protection Team regularly receives complaints concerning odour from the composting activities carried out at this site. It considers that the majority of these complaints arise from the odours of composting activities that are carried out outside, and subsequently removal of the conditions would have a wholly unacceptable impact on the amenities of residential properties in Iwade and Kemsley. The Council considers all composting must be undertaken within the buildings and as such considers Conditions 3, 21 and 24 remain."

The Borough Council were consulted on revised details on 1 June 2012 and 21 November 2012. No further comments have been received.

Iwade Parish Council: No objections are raised subject to planning conditions restricting the annual waste wood throughput, appropriate controls on noise, dust and odour and a condition requiring the wood shredder to be loaded externally but depositing processed wood inside the MRF building.

In addition the Parish Council request that strict fire controls are sought, along with assurances that monitoring will be carried out on a regular basis by the County Council.

Environment Agency: No objection is raised.

Biodiversity Projects Officer: No comments to make.

Jacobs (Noise, Dust, Odour): No objection is raised on noise, dust or odour grounds.

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Transport Planning (Kent Highways and Transportation): No objection is raised.

Local Member

26. The Local County Members, Mr A Willicombe and Mr M Whiting were notified of the application on 2 April 2012.

Publicity

27. The application was publicised by the posting of a site notice and advertisement in the local newspaper.

Representations

28. No letters of representation have been received to date objecting to the proposal.

Discussion

29. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Material planning considerations include the recently adopted National Planning Policy Framework (NPPF) which promotes sustainable development and the regional and local plan policies set out above together with PPS10. It should be noted that the South East Plan remains part of the development plan although the Government's intention to abolish regional spatial strategies is a material consideration and the weight given to it is a matter for the decision maker.
30. Given the nature of the proposal the NPPF should be read together with PPS10 which is to remain in place until new waste policies are published alongside the new National Waste Management Plan for England. However the presumption in favour of sustainable development which lies at the heart of the NPPF still applies. In order to achieve this objective the NPPF identifies a number of key areas, which in my view are of specific relevance namely: Delivering Sustainable Development, Part 1 – Building a strong, competitive economy; Part 7 – Requiring good design; Part 10 – Meeting the challenge of climate change and Part 11 – Conserving and enhancing the natural environment.
31. Policy W9 of the Kent Waste Local Plan identifies the locational criteria against which individual proposals will be considered, whilst policies W18 to W22 and W25 set out the operational criteria. The site is identified under Policy W9 as being suitable in principle for waste transfer and recycling and is an existing operational waste management facility currently run by Countrystyle Recycling Limited as an In-Vessel Composting and material

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recycling facility (MRF).

32. The site already operates with the benefit of an existing planning permission for a MRF, (along with gypsum recycling) and IVC facility and the principle for accepting wood to the site has been established as part of the 2009 biomass project albeit within a fully enclosed building. As indicated above, this current planning application has been submitted following a report to Members of the Regulation Committee by the Head of the Planning Applications in 2012. This required the operator to submit a planning application in order to regularise a number of breaches recorded following a routine monitoring visit by officers to the site.
33. Members of this Committee will be aware that retrospective applications are determined on their planning merits and as if the development had not been implemented.

Swale Borough Council Views

34. The Borough Council have raised an objection to the planning application on the grounds that their Environmental Protection Team regularly receive complaints concerning odour from the composting activities taking place at the site. They consider that the majority of the complaints arise from odours associated with external composting activities and therefore consider that removal of conditions would have a wholly unacceptable impact on amenities of residential properties in Iwade and Kemsley. On this basis the Borough Council considers that conditions 3, 21 and 24 remain.
35. Having set out the Borough Councils view on this section 73 planning application, it is considered necessary to clarify that the applicant is not seeking the removal of conditions 3, 21 and 24. The operator is seeking a variation of condition 3 (revised site layout); and variations of conditions 21 and 24 which currently restrict activities relating to the IVC and MRF processes to within the existing buildings.

Minor Amendments to the Approved Site Layout (condition 3)

36. It is generally accepted that active sites of this scale and nature are likely to be subject to minor changes in terms of general layout in order to suit the daily practicalities of operating such a site. No specific objections have been received in relation to the location of the HGV fitter's shelter, 3m high storage bays, day time car parking spaces along the southern side of the site access road, vehicle washdown and refuelling area to the south of the organic waste reception building and minor changes to the MRF building elevations (i.e. additional doors).
37. However in respect of changes sought to the wood processing activity and location of an external compost fixed screener/mobile screener, I consider that those elements could give rise to noise, dust and odour impacts.

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Noise

38. This established waste site operates within the Ridham Industrial Estate complex and seeks permission to operate a wood shredder partially outside the existing MRF building, external stockpiling of unprocessed wood and the use of a fixed and mobile compost screener outside of the existing IVC building.
39. The Parish Council had initially raised concerns over the potential to cause adverse noise impacts on the nearby residential development, which are some 1.2 km distant from this site. Those concerns relate specifically to the equipment used in relation to the external wood processing activity as well as the external screeners associated with the IVC activities. Given the close proximity of the site to the designated SPA, SSSI and Ramsar, the Applicant has provided a noise assessment in support of his application. The assessment identifies potential noise sensitive receptors as the nearby designations, along with Lloyd Drive which is the nearest residential area (i.e. Kemsley Fields). The assessment, which was conducted in accordance with guidance contained in BS4142, concluded that predicted rating levels from operations at the MRF and existing IVC facility would lead to a situation where there would be a positive indication that complaints would be unlikely during the daytime and a situation between marginal significance and a positive indication that complaints would be unlikely during the night-time. Given the distance between the site and the nearest residential properties the Applicant considers additional noise mitigation measures unnecessary.
40. Jacobs, the County Council's noise consultants have been consulted and comment that having regard to the distance of the nearest residential properties, noise levels are predicted to fall well below existing noise levels at the nearest properties and that there are unlikely to be complaints in relation to noise generated from the site.
41. However the Applicant's ambient noise assessment indicated a *minor, barely perceptible impact during the day time and moderate impact during the night-time* on the nearby SPA, SSSI and Ramsar. By way of mitigation the Applicant considers restrictions on the use of external plant necessary and specifically that any external plant located nearest to those designations should not be operated outside the hours of between 0700 and 1900. Having sought advice with regard to the possible impact from noise on the nearby designations, Jacobs raise no objection provided the County Council's own Ecologist considers that there would be no noise impact on the nearby SPA and Ramsar.
42. The County Ecologist has been formally consulted on the planning application along with the accompanying noise assessment and has also raised no objection to the proposal stating that, in their view, the proposed changes to the site would have *minimal impact* on the surrounding designated sites. However they further advise that the mitigation detailed in the noise assessment should be carried out as specified by the operator. I concur with the views of consultees and consider that noise is not likely to be a cause for concern at the site, either on residential properties nor nearby designated areas, provided planning conditions are imposed to control the operating hours of the external plant, being the fixed and mobile screener and that the wood processing equipment (grab/excavator and shredder) continues to be operated as it is currently (partially within the MRF building). On

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this basis I am satisfied that the proposal meets the requirements of Policy W18 of the KWLP therefore should Members resolve to grant planning permission, noise could be controlled at the site.

Dust

43. The Parish Council initially raised concerns that the shredding of wood outside the building could present a dust hazard. Dust mitigation measures are already employed at the site under the terms of the existing planning consent and whilst there had been some dust issues at the site previously, these were linked to a faulty roller shutter door at the MRF where gypsum was processed. This was remedied some while ago and I am satisfied, following my last site visit, that continued maintenance of the doors are a priority for the applicant. Dust mitigation at the site includes the use of dampening down measures and the closure of the roller shutter doors except when deliveries are taking place. Dust emissions are also covered under the site's Environmental Permit, therefore in my view can continue to be monitored and controlled at this site under the terms of both the existing planning permission and the Permit. Jacobs, the County Council's advisors on such matters have raised no objection in relation to dust and I am satisfied that effective dust mitigation measures and good housekeeping practices remain in place. I therefore consider that the dust can continue to be controlled in accordance with policy W18 of the KWLP and SP2 of the Swale Borough Local Plan as well as meet the objectives set out in Part 7 - minimising impacts on the environment and Part 11 - through good design, of the NPPF.

Odour

44. In relation to odour management at the site, particularly in relation to in-vessel composting (IVC) activities, the original planning permission restricted all activities relating to the IVC within the fully enclosed building, with the exception of the maturation area as identified on drawing number 11.09B01 B (above). This application retrospectively seeks formal permission to operate a fixed screener and mobile screener in an area outside the IVC building, albeit these have been in place for some considerable time. The applicant has submitted an odour assessment in support of his application.
45. The Borough Council have raised concerns in relation to potential odour generated from external activities associated with the IVC and specifically refer to an number of complaints received via their own Environmental Protection Team. They are concerned that allowing any screening to take place in the open would impact on the nearest residential properties. The Applicant is aware that there have been some concerns relating to odour and accept that notwithstanding their close location to a sewage treatment works, have looked to improve odour management on their own site.
46. The EA, who regulate and monitor the site under the existing Permitting regime, have been working closely with the operator on this matter and requested that the applicant submit an Odour Management Plan (OMP) in support of both the planning application and the existing Permit. The County Council have continued to liaise with the EA and the

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operator and it is understood that the operator has investigated in more depth how the mix of waste has the potential to generate odour from the site. The applicant has sought to address this with the EA and as a result the operator has now provided a new OMP for the site and whilst it was formally submitted to the County Council in May 2012, the Borough Council have made no further comments on this to date. The EA have raised no objection to the application, and specifically the OMP, acknowledging that the operator has invested in monitoring equipment which will continue to provide evidence and improve understanding of the waste which is to be screened and therefore help to implement changes to reduce any odour. Consistent with advice set out in the National Planning Policy Framework, odour will continue to be managed at the site as a requirement of the Permitting regime and it would therefore be inappropriate to duplicate the controls covered by the EA's permitting process.

47. I am re-assured that no further complaints have been relayed to me via the Borough Council since mid 2012 and consider that this is likely to have been as a result of ongoing dialogue between the operator and the Environment Agency. Odour will continue to be managed at the site as a requirement of the Permitting regime. I am therefore satisfied that odour can continue to be successfully managed and that there is no reasonable ground to withhold planning permission on this aspect.
48. Having considered the external elements of this proposal, in particular from the external wood shredding and compost screeners, in terms of the possible noise, dust and odour impacts I am satisfied that with suitable controls in place development can be carried out without having any unacceptable adverse impacts. Given the proposed reduction in wood waste throughput, to 10,000 tpa, I also consider this element to be relatively a low key activity. In the absence of any technical objections to the proposal from consultees I consider that a refusal of the planning application would be difficult to defend were the applicant to appeal.

Other matters

49. Whilst, with the exception of the Borough Council, no other objections have been raised specifically in relation to this planning application, Iwade Parish Council were previously raised concerns in relation to the number of proposals linked to wood storage within the Ridham Industrial complex generally. Whilst the Countrystyle site already processes wood at this site, they also gained planning permission, in September 2012, to locate similar wood processing and storage activities at Building 17 within the Dock area (under permission reference SW/12/927) and had initially intended to fully cease wood shredding and storage at this site in favour of Building 17. However for operational reasons CRL now wish to retain some flexibility and have requested to continue wood shredding and storage on site, albeit at a significantly reduced annual throughput compared to that currently permitted at the site. The Parish Council have raised no objection to this, subject to a condition restricting the annual throughput to 10,000 tonnes per annum, which the applicant is content to accept.

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50. Finally, the past history of the operator at this particular site was documented at the July 2012 Planning Applications Committee, following concerns raised by the Parish Council. They have again raised the matter of the operator submitting 'retrospective' planning applications and although I accept that this has been an issue previously, in this instance I have found the Applicant committed to ensuring compliance at the site and addressing the breaches of planning control. Members will be aware that planning enforcement guidance where development is acceptable in principle, encourages breaches of planning control to be tested by a planning application. The determination of the application however is on its merits and assumes that the development has not taken place. I do however consider that the most appropriate way to ensure continued cooperation is for regular site monitoring to be carried out by Officers in order to maintain planning control.

Conclusion

51. In conclusion, I am of the opinion that the proposal is consistent with the policies set out in the NPPF including paragraph 122 which advises that LPA's focus on whether the development itself is an acceptable use of the land, South East Plan, Kent Waste Local Plan and Swale Borough Local Plan. In my opinion provided any future permission contains appropriate conditions, particularly those required to mitigate any adverse impacts on the nearby designated sites, the development would not result in any adverse impacts on residential amenity and nearby sensitive designations. The site will require regular monitoring to ensure compliance in the future. Having regard to the objectives in the NPPF, the application in my view represents sustainable development. I therefore recommend accordingly.

Recommendation

52. I RECOMMEND that PERMISSION BE GRANTED, SUBJECT TO CONDITIONS covering amongst other matters, that development be carried out strictly in accordance with drawing number 11.09B.01 B (which also identifies an area for storage of unprocessed wood), a restriction on the times of use of external plant, noise, mitigation measures set out in the dust and odour management plans, along with restrictions on the wood waste throughput to 10,000 tonnes per annum and evidence to demonstrate compliance and external stockpile height restrictions to 3m.

Case Officer: Angela Watts	01622 221059
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Background Documents: See Section Heading
