

# Statement of Common Ground between Shropshire Council and Herefordshire Council

April 2021

## 1. Introduction

- 1.1. The National Planning Policy Framework (2019) (NPPF), specifies that Local Planning Authorities are *“under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries”*<sup>1</sup>.
- 1.2. The NPPF also specifies that *“in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency”*<sup>2</sup>.

## 2. Purpose

- 2.1. This Statement of Common Ground (SoCG) has been produced to support the Shropshire and Herefordshire Council Local Plan Reviews as well as the Herefordshire Minerals and Waste Local Plan. It sets out how Shropshire Council and Herefordshire Council have engaged in order to fulfil their Duty to Cooperate requirements.

## 3. Scope

- 3.1. The National Planning Practice Guidance (NPPG) provides details on the scope of a SoCG, which can be summarised as follows:
- 3.2.

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<sup>1</sup> MHCLG, (2019), NPPF – Paragraph 24

<sup>2</sup> MHCLG, (2019), NPPF – Paragraph 26

- The plan-making authorities responsible for joint working detailed in the statement;
- A description and map of the administrative areas covered by the statement, and a brief justification for these area(s);
- The key strategic matters being addressed by the statement;
- Governance arrangements for the cooperation process;
- If applicable, the housing requirements (if known) within the area covered by the statement;
- Distribution of needs or the process for agreeing distribution of needs (including whether there is and the distribution of unmet needs);
- A record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- Any additional strategic matters to be addressed by the statement which have not already been addressed.

3.3. The NPPG also recognises that *“The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities’ websites”*<sup>3</sup>.

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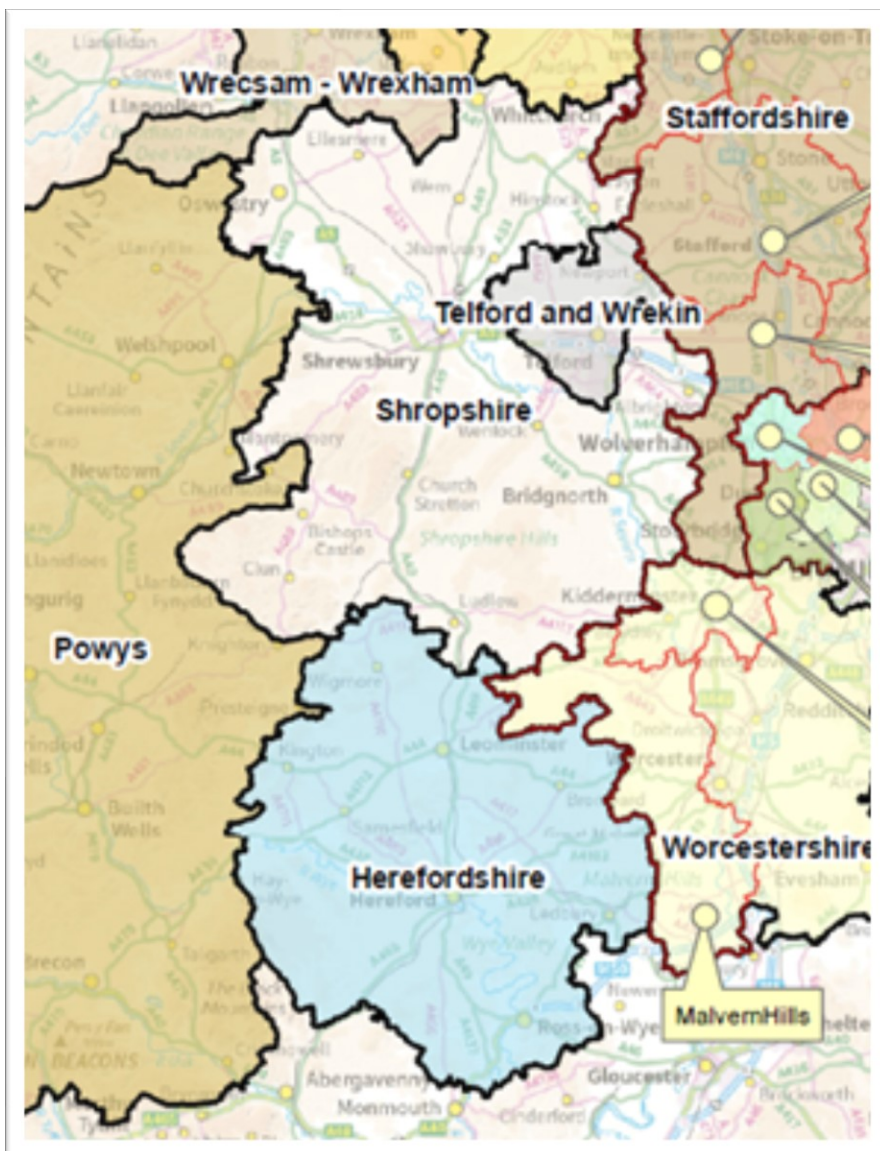
<sup>3</sup> MHCLG, (2019), NPPG – Plan Making, Paragraph: 011 Reference ID: 61-011-20190315

## 4. Relevant Local Authorities and Geography

4.1. This SoCG has been prepared jointly by Shropshire Council and Herefordshire Council. The two Local Planning Authorities are neighbouring authorities and between them cover the entirety of the county areas of Shropshire and Herefordshire respectively.

4.2. Figure 1 illustrates the location of Shropshire and Herefordshire Councils:

**Figure 1: Map of Shropshire Council and Herefordshire Council**



- 4.3. As neighbouring Local Planning Authorities, it is important that effective duty to cooperate discussions are undertaken regarding strategic matters that cross administrative boundaries.
- 4.4. Given the different approaches and different timescales for the preparation of documents associated with the Local Authorities' Local Plan Reviews, this SoCG has concentrated on those issues known to be currently relevant, with a focus on the Shropshire Council Local Plan Review (2016-2038) and the Herefordshire Minerals and Waste Local Plan. A separate SoCG may be prepared regarding the issues relevant to the Herefordshire Council Local Plan Review at an appropriate time in its process. However, duty to cooperate discussions will continue as both Local Plan Reviews progress.

## **5. Duty to Cooperate**

### **Shropshire Council Local Plan Review**

- 5.1. The Shropshire Local Plan currently comprises the Core Strategy (adopted 2011) and the Site Allocations and Management of Development (SAMDev) Plan (adopted 2015), together with the adopted Neighbourhood Plans. On completion of the review process, the Core Strategy and SAMDev documents will be replaced by a single Local Plan document (supported by any adopted Neighbourhood Plans) which will include all strategic and detailed policies, together with all site allocations for a Plan period 2016 to 2038.
- 5.2. Shropshire Council is at an advanced stage in the review of its Local Plan which has been through several stages of consultation as set out below. Timescales for submission to the Secretary of State for Examination have been subject to review in light of the Covid 19 emergency and changes to the timetable are reflected in an updated LDS.
- 5.3. There has been ongoing and active engagement between Shropshire Council and Herefordshire Council throughout the Shropshire Council Local Plan Review. Shropshire Council has consulted Herefordshire Council at every stage of plan making.
- 5.4. The Shropshire Local Plan Review consultation periods thus far are as follows:
  - Issues and Strategic Options Consultation – 23rd January 2017 to 20th March 2017.
  - Preferred Scale and Distribution of Development Consultation – 27<sup>th</sup> October 2017 to 22<sup>nd</sup> December 2017.

- Preferred Sites Consultation – 29th November 2018 to 8th February 2019.
- Strategic Sites Consultation – 1st July 2019 to 9th September 2019.
- Regulation 18: Pre-Submission Draft of the Shropshire Local Plan – 3rd August 2020 – 30th September 2020.
- Herefordshire Council has been consulted as part of the ‘Regulation 19’ Consultation undertaken 18th December 2020 and 26th February 2021 to inform the Shropshire Local Plan Review.
- Duty to Cooperate discussions will continue at appropriate times as the Local Plan Review progresses.

## **Herefordshire Local Plan Review**

- 5.5. Herefordshire Council adopted the Core Strategy in 2015 and the Travellers Sites Development Plan in October 2019. In December 2020 a formal decision was made by the Cabinet Member for Transport and Infrastructure to update the Herefordshire Local Plan Core Strategy. It was also decided that work be stopped on the Hereford Area Plan, Rural Areas Site Allocations Plan and the Bromyard Development Plan as these matters will be incorporated into the Core Strategy update.
- 5.6. It was also agreed that progress be continued upon the emerging Minerals and Waste Local Plan (MWLP) as this is at an advanced stage of production. The Issues and Options consultation took place between August and October 2017, and consultation on the Draft MWLP January to March 2019. The next stage of consultation on Regulation 19 Plan is currently taking place (April to May 2021).
- 5.7. There are also a large number of Neighbourhood Development Plans (NDPs) which have been adopted or are under preparation by parish and town councils. These play an important role in delivering the rural and non-strategic housing requirement set out in the adopted Core Strategy. Town and parish councils consult their neighbouring parish councils and local authorities as part of their plan preparation process.
- 5.8. The timescale for the preparation of the Core Strategy update is subject to formal agreement. However, the first stage consultation regarding Issues and Options is likely to take place in early to mid 2022.
- 5.9 Duty to cooperate discussions have been ongoing throughout the preparation of the now adopted Core Strategy and Travellers Sites DPD, as well as the emerging Minerals and Waste Local Plan. At examination, the Inspectors for the two former

plans concluded that Duty to Cooperate requirements had been met. The Council intends to continue duty to cooperate discussions at appropriate times during the update of the Core Strategy. Herefordshire Council includes Shropshire Council in all plan making consultations.

## **6. Key Strategic Matters**

**These are level of housing need, and housing and employment requirements and strategy for distribution of future growth**

### **Shropshire Council**

- 6.1. Using Government's standard methodology, in 2020, Shropshire Council calculated a Local Housing Need (LHN) which applies to both the Local Planning Authority area and the Shropshire Council housing market area of some 1,177 dwellings per annum (equating to 25,894 dwellings over the 22-year plan period from 2016-2038). The assessment of need will be kept under review. Shropshire Council is proposing to meet the entirety of its LHN.
- 6.2. The Shropshire Council area is considered to represent a self-contained housing market area (HMA).
- 6.3. Shropshire's proposed development strategy seeks to support a sustainable pattern of future growth across Shropshire over the Plan period. Key aspects of its strategy for growth are:- high housing growth of 30,800 dwellings (Between 2016-2038) with a balanced employment requirement of 300 ha; an urban focused distribution of development with the majority of development and infrastructure growth directed to Shrewsbury and the other Shropshire towns together with strategic sites, and more limited development to support the sustainability of rural communities. Shropshire Council has consulted on development options which would meet its own housing and employment needs within its own administrative area.
- 6.4. Shropshire and Herefordshire are linked by the transport corridor associated with the A49 and Manchester – Cardiff rail line. This is identified in the Draft Local Plan as part of the A49 strategic corridor which runs north-south through the county and supports road and rail links to other regions to the north and south-west, as well as South Wales. To the south of the county the corridor includes Ludlow as a Principal Centre; Craven Arms as a Key Centre and Church Stretton as a Key Centre within the Shropshire Hills AONB. The area adjoining Herefordshire is mainly rural with low levels of proposed development and is impacted by development constraints imposed by the River Clun SAC and related phosphate management issues.
- 6.5. The overall strategic approach of development in the Draft Local Plan seeks that the majority of development will be focused in identified existing urban areas and

strategic settlements. Relative to Herefordshire, Ludlow is the closest main location for growth in Shropshire with Craven Arms further to the north in the A49 corridor.

- 6.6. Proposed growth of 1000 dwellings and around 11ha employment development is identified for Ludlow. Proposed allocations in the Draft Plan provide for around 100 dwellings and 5ha of employment land but it is expected that the majority of housing development will be delivered through saved allocations from the adopted SAMDev Plan and other existing commitments. Craven Arms as a key centre is expected to deliver around 500 dwellings and make available around 15 hectares of employment land but principally through existing commitments and saved allocations from the adopted SAMDev Plan. There are no new proposed allocations in Church Stretton. Additionally, there are a range of smaller settlements identified in the draft Plan which will be expected to accommodate more modest levels of development. Within Ludlow place plan area Burford has allocations for around 140 dwellings but adjoins the boundary with Worcestershire rather than Herefordshire. No significant cross boundary impacts are anticipated to arise from the scale of proposed additional growth identified.
- 6.7 There is inevitably some cross boundary movement between authority areas, with some commuting particularly to and from Ludlow, however the draft Shropshire Local Plan includes modest additional allocations to the south of County and aims to achieve 'balanced growth' which recognises the need to provide local employment to balance housing provision. Evidence also suggests that Shropshire is a self-contained functional economic market area and that each of the local authorities have separate housing market areas. However, it is acknowledged that the duty to cooperate is not restricted to just planning authorities within the same HMA. As such, both local authorities continue to liaise closely in accordance with the Duty to Cooperate.

## **Herefordshire Council**

- 6.8 Herefordshire is impacted by development constraints imposed by the River Wye and River Lugg SACs and related phosphate management issues. This has resulted in restrictions on development in approximately 40% of Herefordshire, including three of the market towns: Leominster, Kington and Bromyard. Herefordshire Council together with a range of partner organisations, including Environment Agency, Natural England, Dwr Cymru Welsh Water and Powys County Council, is urgently seeking to resolve the levels of phosphate in the River Wye SAC. Herefordshire Council has commissioned consultants to produce an Interim Phosphate Delivery Plan (Interim Plan). The purpose of the Interim Plan is to enable developers, and where appropriate the decision maker, to proactively seek to demonstrate nutrient neutrality of their development proposals via an established methodology to provide sufficient certainty to enable Herefordshire Council as competent authority to determine no likely significant effect to the SAC, through

appropriate assessment. The Interim Plan will comprise a phosphate calculator, a set of potential measures to offset the identified phosphate load of projects and plans, and an alternative potential methodology for costing the offsetting of phosphate via Section 106/ CIL contributions. It will form an annex to the Nutrient Management Plan. It is likely that this issue may need to be further addressed as part of the Core Strategy update.

- 6.9 Furthermore, the Core Strategy identifies options for future growth around Hereford, the county's principal urban centre, with the delivery of a transport strategy for the city which included a relief road to the west of Hereford as well as improvements to walking and cycling. However, this transport strategy has been reviewed and a decision was taken by the Cabinet on 21 January 2021 to stop the western bypass and southern link road schemes. Therefore, the full update of the Core Strategy will need to reconsider how to accommodate its housing growth requirement without this planned road infrastructure.

## **Green Belt**

### **Shropshire Council**

- 6.10 In order to achieve a sustainable pattern of development, Shropshire Council is proposing to accommodate development in such a way that helps make more sustainable, balanced, vibrant, resilient and self-reliant places in which to live and work. Specifically, the Local Plan Review directs the majority of new development towards the larger settlements with the most extensive range of services, facilities and infrastructure to support it. However, it also allows for appropriate levels of development within rural areas, to support the longer-term sustainability of rural communities.
- 6.11 The eastern part of Shropshire is within the West Midlands Green Belt. To inform the ongoing Local Plan Review, Shropshire Council has undertaken a Green Belt review. Whilst most additional development is proposed in locations outside the Green Belt, the strategic economic importance of the eastern part of the County, particularly the M54 corridor, is a significant consideration. Impacts on longer term sustainability of Green Belt settlements due to constraints on their ability to meet their local development requirements have also been identified. As such, a level of Green Belt release is proposed within the ongoing Local Plan Review.
- 6.12 As required by NPPF, Shropshire Council have explored with Herefordshire Council their ability to accommodate Green Belt development requirements, particularly



those relating to the sustainable growth requirements of specific settlements. This has been formalised in a written communication sent 27th February 2020 which asked whether Herefordshire could assist in meeting the identified development needs for: Bridgnorth; Albrighton; Shifnal; Alveley; and RAF Cosford. Herefordshire Council replied on 20 April 2020 to indicate that it is unable to meet the identified Green Belt development requirements. This response is attached to this SoCG

## **Herefordshire Council**

6.13 Herefordshire is outside the West Midlands Green Belt but is also geographically remote from those areas in Shropshire where Green Belt release is proposed. This is reflected in the functional relationships between Herefordshire and the identified locations and the practical ability to meet the identified strategic and sustainable growth requirements. It has also been established that Herefordshire is already facing challenges in accommodating the current housing needs set out in the adopted Core Strategy. These challenges are likely to continue as the Council carries out a full update of the Core Strategy.

## **7 Other Strategic Matters**

### **Gypsies and Travellers**

#### **Shropshire Council**

- 7.1 Shropshire has finalised an updated Gypsy and Traveller accommodation assessment (GTAA 2019). The updated GTAA refines the previously published GTAA (2017) by updating site information and considering public site management data to better understand and evidence site capacity and pitch turnover. Unauthorised encampment activity is also considered.
- 7.2 The greatest concentration of and demand for Gypsy and traveller sites in Shropshire has been in the north of the County with relatively limited provision in the south west of the County. The A49 is the main transit route running from the north of Shropshire to Herefordshire and the South West/Wales. This inevitably creates cross-boundary movement. Shrewsbury however tends to be a particular focus for unauthorised encampment being located at an intersection for main transit routes through Shropshire, including the A49.
- 7.3 The evidence from the GTAA (2019) concludes that there is no current strategic requirement for allocation. However, the need to provide a permanent plot for Travelling Showpeople resident on a temporary site in Shropshire and potentially for

public transit capacity to support private provision are identified. These requirements are being addressed by the Council, with planning permission granted for a travelling showpersons site and a public consultation on a location for a temporary Council transit site undertaken in late 2020. In addition to the intended direct provision, local plan policy will facilitate the ongoing delivery of sites to meet arising needs. Shropshire thus intends to address its own needs for gypsy and traveller provision.

## **Herefordshire Council**

7.4 Herefordshire has adopted a Travellers' sites DPD which includes five-year supply of sites and a temporary stopping place off the A49 at Leominster. Allocations have addressed identified requirements for PPTS pitch provision. The longer term need for pitches as well as the accommodation to meet the needs of travellers who do not meet the PPTS definition will be considered as part of the Core Strategy Update. A revised Gypsy and Traveller Accommodation Assessment has recently started as part of the Housing Market Area Needs Assessment but has been delayed as a result of the pandemic restrictions. The consultants will liaise with all the neighbouring authorities on this matter.

## **Minerals & Waste**

7.5 Both Councils are active members of the West Midlands Regional Aggregate Working Party and the West Midlands Resource Technical Advisory Body. Both these groups have been in place for a number of years and meet biannually.

## **Shropshire Council**

7.6 Increasing rates of housing and employment development have strengthened the demand for construction aggregates within Shropshire and in the adjacent areas which it supplies. Despite increased demand, sufficient crushed rock aggregate resources are already available from permitted sites. The availability of sand and gravel resources remains well above the minimum guideline and the adopted Plan (SAMDev) included allocations which provide for additional capacity. No additional site allocations for either crushed rock or sand and gravel provision are therefore proposed as part of the Local Plan Review. However, development management policies will continue to provide for the consideration of 'windfall' sites or site extensions.

7.7 Shropshire has a waste transfer and energy recovery facility located in Shrewsbury. Shropshire Council supports the further development of a circular economy where the active recovery of material resources and energy from waste helps reduce environmental and financial costs and actively fosters opportunities for business

growth. The county performs well against national waste management targets and has sufficient existing capacity, including the land resources to meet its future needs. No further specific provision is therefore planned for waste management infrastructure. To accommodate any future demands, land will be available as part of the employment land supply.

## **Herefordshire Council**

- 7.8 A Minerals and Waste Local Plan (MWLP) is being prepared. Following consultation on the draft plan in early 2019 the responses were reviewed and additional work undertaken, as required. The supplementary tasks included further analysis of those sites proposed to be allocated, assessment of a new site that was promoted through the representations, consideration of historic landfill sites within Herefordshire, and updating the minerals and waste need assessments.
- 7.9 The Publication Draft MWLP which has since been prepared also reflects changes to the National Planning Policy Framework (NPPF) and other relevant national policy documents, including the latest national waste strategy and incorporates the recommendations from a level 2 Strategic Flood Risk Assessment completed in 2020.
- 7.10 Further work on the MWLP was delayed in the first half of 2020 due to Covid 19 but recommenced in July 2020 and additional updates and reviews to the Publication Draft MWLP were added. The document was then considered by the Council's General Scrutiny Committee and Cabinet. Although no strategic matters were raised, several edits to policies and supporting text were introduced and subsequently incorporated into the MWLP.
- 7.11 Consultation (regulation 19) on the publication draft MWLP is underway (April to May 2021), prior to its subsequent formal submission and examination.
- 7.12 Herefordshire is 50% sufficient in sand and gravel and 20-30% self-sufficient in crushed rock, primarily because the county does not contain the appropriate specification of limestone for demands. Crushed rock needs are currently met by imports from Powys, and, to a lesser extent, from Somerset. The MWLP proposes the allocations of extensions to both crushed rock and sand and gravel quarries to build in resilience, increase self-sufficiency in minerals production and to help contribute to the managed aggregate supply system (MASS). None of these sites are located close to Shropshire's boundary, the closest being a limestone quarry near Leinthall Earls in the north of Herefordshire.
- 7.13 Waste strategy: The Council is concentrating on the delivery of sustainable waste management through: a reduction in the amount of waste generated, an increase in the amount of waste re-used, recycled or used to recover energy, and a decrease in the amount of waste disposed to landfill. The objective is to deliver a circular economy and to provide a positive framework within which to deliver additional

waste management capacity to enable increased self-sufficiency. There are large quantities of agricultural waste in Herefordshire and raised levels of phosphates in local watercourses, therefore policies have been developed specifically relating to the management of agricultural wastes and wastewater.

## **Agreement between Shropshire and Herefordshire Councils for ongoing working arrangements.**

7.14 Shropshire and Herefordshire Councils agree to continue to cooperate in the following way in relation to minerals and waste planning:

- That mineral planning authority level monitoring data on sales and reserves for sourced from within the SoCG boundary will be collected and kept up-to-date as regularly as possible;
- That each of the MPAs will collect monitoring data on the destination of aggregate sales, sourced from within their administrative boundary for those years when a national AM survey is carried, and where possible will endeavour to collect similar data for the intervening years;
- To notify each other when undertaking public consultation on local development documents and other plans relevant to the carrying out of land-use planning functions, which could have an impact on aggregate and / or industrial minerals; and / or other non-energy mineral supplies sourced from within the SoCG boundary and / or the delivery of sustainable waste management;
- To notify each other of planning proposals that fall within their administrative area for minerals, waste and non-minerals of development, which could have a significant impact on other minerals and waste planning authority areas with respect to the safeguarding of existing minerals & waste infrastructure and / or the avoidance of needlessly sterilising mineral resources;
- When appropriate, to meet and discuss minerals and waste-related planning issues raised by one or both of the signatories, which could have an impact on mineral supplies or sustainable waste management from within the SoCG boundary;
- To take account of accumulated monitoring data sourced from the SoCG boundary when developing local plan policy that will influence provision for

aggregates and / or industrial minerals; the availability of supplies of other non-energy minerals; and / or the management of waste including in the production of supporting evidence reports and formal consultation documents;

- To take account of accumulated monitoring data sourced from the SoCG boundary when developing local plan policy that will influence provision for aggregates and / or industrial minerals; the availability of supplies of other non-energy minerals; and / or the management of waste including in the production of supporting evidence reports and formal consultation documents;
- To take account of the outcomes of any discussions held between the signatories on minerals or waste-related planning issues when developing local plan policy that will influence the provision of aggregates, and / or industrial minerals; or the availability of supplies of other non-energy minerals or the management of waste including in the production of supporting evidence reports and formal consultation documents;

## **Neighbourhood Planning.**

### **Shropshire Council**

7.15 There are currently no cross-boundary Neighbourhood Plans or Neighbourhood Plans within Shropshire that share a land boundary with Herefordshire. Where Plans emerge appropriate engagement and consultation will take place at relevant stages, as set out in the Neighbourhood Planning (General) Regulations 2012.

### ***Herefordshire Council***

7.16 Herefordshire Council have taken a positive approach to neighbourhood planning and provides support and advice to those communities interested in producing plans to complement the Core Strategy and provide detailed policies and site allocated for parishes. Neighbourhood Plans were included within the Local Development Scheme in 2014.

7.17 There are currently 113 neighbourhood areas designed within Herefordshire, this equates to 92% of the settlements highlighted within the Core Strategy got proportionate growth and 88% of all parishes within the county.

7.18 Of the 113 neighbourhood areas within Herefordshire, 4 share a border with Shropshire; Border Group; Leintwardine Group; Brimfield and Little Hereford; and Orleton and Richards Castle. All of these plans have been made/adopted.

7.19 There are no cross-boundary Neighbourhood Plans. If these four adopted NDPs seek to review, appropriate engagement and consultation will take place at appropriate stages with Shropshire Council and the relevant adjoining parish councils, as set out in the Neighbourhood Planning (General) Regulations 2012.

## **8 Mechanisms of Agreement**

8.1 Shropshire and Herefordshire have had ongoing communication, including formal consultation periods, as part of their Local Plan Review processes as outlined in section 5 above.

8.2 Meetings have taken place as necessary to discuss relevant matters, including strategic issues, and the most recent Duty to Cooperate meeting was held on 15<sup>th</sup> January 2020.

8.3 Shropshire sent a written communication on 27<sup>th</sup> February 2020 to all its neighbouring authorities, including Herefordshire, to ask whether they could assist in meeting the identified Green Belt development needs. This request was formally considered by Herefordshire Council's Cabinet Member for Infrastructure and Transport. A response was received on 21<sup>st</sup> April 2020.

## **9 Matters of Agreement**

9.1 It is acknowledged by both parties, as set out in the statement above, that there are significant functional constraints which would impact on the ability of Herefordshire to address any development requirements resulting from cross boundary needs. Shropshire Council intends to meet their identified Local Housing Need (LHN) within their Local Authority area.

9.2 The formal decision made by Herefordshire Council in respect of Shropshire Council's request for Herefordshire to consider whether it is able to accommodate any of Shropshire's identified Green Belt development requirements is that it is unable to do so. This decision was made by the Cabinet Member for Transport and Infrastructure on 20<sup>th</sup> April 2020

9.3 Section 7 sets out how the both parties will continue to work together on minerals and waste planning issues to ensure effective cross boundary working on these matters.

9.4 All other strategic matters were agreed on.

## **10 Matters of Disagreement**

10.1 There are no matters about which Shropshire Council and Herefordshire Council disagree.

## **11 Governance Arrangements**

11.1 Governance arrangements are key to ensure that effective duty to cooperate discussions are undertaken and an appropriate SoCG prepared.

11.2 Updating of this SoCG will be linked to key milestones within the Local Plan processes for the Local Planning Authorities involved.

## **12 Conclusions**

12.1 The parties agree that:

- i) Shropshire Council has fulfilled its Duty to Cooperate with Herefordshire Council.
- ii) Herefordshire Council has fulfilled its Duty to Cooperate with Shropshire Council.
- iii) The parties will continue to work positively together and where relevant with other prescribed bodies on strategic cross boundary issues.

## 13 Signatories

13.1 This SoCG has been agreed and signed by the following:

**Figure 2: Signatories**

<b>Shropshire Council</b>	<b>Herefordshire Council</b>
<p><b>Name:</b> Edward West <b>Position:</b> Planning Policy and Strategy Manager <b>Date agreed:</b> 8<sup>th</sup> April 2021 <b>Signature:</b></p>	<p><b>Name:</b> Marc Willimont <b>Position:</b> Assistant Director for Regulatory, Environment and Waste services <b>Date agreed:</b> 27<sup>th</sup> April 2021 <b>Signature:</b></p>