



Newcastle-under-Lyme Local Plan Examination

Response to Inspectors Post Examination Hearing Views – Site Selection – Flood Risk

1. The Inspector, in her post hearing views [EX/INS/06, paragraphs 11 – 14] noted that the Council has submitted a Level 2 Strategic Flood Risk Assessment (SFRA2) during the examination of the Local Plan [EX/NBC/06 and appendices].
2. Alongside the SFRA2, the Council has provided supplementary notes on flood risk including EX/NBC/05 'Flooding note for Inspector 28 March 2025' and a statement of common ground with the Environment Agency [EX/SCG/08].
3. The Inspector has asked the Council to provide some supplementary information, to that contained in EX/NBC/05, in relation to the application of the exception test for nine allocations identified in the SFRA2 (EX/NBC/06, pg 11).
4. Furthermore, the Council has been asked to demonstrate that in considering the advice in the SFRA2, that allocations proposed in the Local Plan remain sound, taking into account the likely future effects of flood risk. In particular, the likely pattern of development on allocated sites, considering the likely disposition of surface water flooding and its depth and velocity. This should also reference the indicative yield of 'amber sites' identified in the SFRA2.

Exception Test

5. The Council's 'Flooding Note for Inspector, 28 March 2025' (EX/NBC/05), in appendix 1, included a list of sites identified in the Level 2 Site Assessment Summary within a 'red' category in respect of potential flood risk. The note then provided some information in relation to the need for a sequential / exception test. The sites identified in EX/NBC/05 were as follows:
 -
 - AB2 'Land at J16, M6'
 - AB33 'Land off Nantwich Road / Park Lane'
 - BL8 'Land adj to roundabout at West Avenue'
 - BW1 'Chatterley Valley'
 - CH13 'Castletown Grange, Douglas Road'
 - SP22 'Former Playground off Ash Grove'
 - TB19 'Land south of Newcastle Golf Club'
 - TC40 'Blackfriars Road'
 - Site 11 'Hardingswood Lane'

6. Following the Inspector's Post Hearing Views, a couple of sites are to be removed from the Local Plan (site refs AB33 'land off Nantwich Road' and CH13 'Castletown Grange'). These sites are therefore not considered in the further analysis undertaken in the rest of this note.
7. Furthermore, site BL8 'Land adj. to roundabout at West Avenue' (ref 22/01067/FUL) and site SP22 'Former Playground off Ash Grove, Silverdale (24/00231/FUL) are now commitments and so are not included in Table 1 (below). This leaves the following sites for consideration: -
 - Site AB2 'Land at J16, M6'
 - Site BW1 'Chatterley Valley'
 - Site TB19 'Land south of Newcastle Golf Club'
 - Site TC40 'Blackfriars Road'
 - Site G&T11 'Hardingswood Road'
8. As employment sites are classified as 'less vulnerable', then in line with National Planning Policy, sites BW1 'Chatterley Valley' and AB2 'Land at J16, M6' are not required to complete the exception test. This is confirmed in the Level 2 SFRA for AB2 (ref EX/NBC/06c(i), pg 16) and for BW1 (ref EX/NBC/06c(iv), pg 18). However, to assist the Inspector, a number of comments on the wider sustainable development objectives of those sites are included in Table 1 below for the sake of completeness.
9. The remaining sites for further assessment include sites TB19, TC40 and Site 11. Further information on these sites is also presented in table 1 below: -

Table 1: Exception Test Site Commentary

Site Reference	Exception Test Commentary
AB2 'land at J16 of the M6'	As employment sites are less vulnerable forms of development then an exception test is not required for this site. However, to assist the Inspector's consideration of the site, the following wider sustainable development objectives are deemed relevant. The site provides for a high quality sub-regional business park at Junction 16 of the M6 motorway, taking advantage of its accessibility to the strategic road network and to support economic growth in line with the vision and strategic objectives in the Local Plan. It will diversify the Borough's employment base, in particular for distribution, logistics and manufacturing. The site will generate skilled jobs for local people (in line with strategic objective SO-2) and support the portfolio of quality employment land sites in the Borough. The site also meets an identified need for Heavy Good Vehicle parking on the site. A planning application for the site which has been submitted to the Council (25/00346/OUT) is supported by a flood risk assessment and includes a mitigation strategy to minimise surface water or fluvial flood risk, both in terms of depth and velocity.

	The site is intended to be supported by Sustainable Drainage Systems (SuDs) including attenuation basins, permeable paving, swales and filter drains and access roads, car parking and service infrastructure strategically located in lower risk where necessary maintaining safe access and egress routes. With maintenance, it is considered that the site and flood risk can be managed on the site. Invited by the Council, the site promoter has provided a note to the action item on site AB2.
BW1 'Chatterley Valley'	As employment sites are less vulnerable forms of development then an exception test is not required for this site. However, to assist the Inspector's consideration of the site, the following wider sustainable development objectives are relevant. The site provides for an opportunity to extend the existing Chatterley Valley employment development, supporting economic growth, to diversity the borough's employment base and space for local businesses to locate, including grow on space to contribute towards meeting the Boroughs employment land requirement in the Local Plan.
TB19 'land south of Newcastle Golf Club'	The NPPF classifies residential development as 'more vulnerable'. However, the exception test is not required for this site as the entire site is located within fluvial EA Flood Zone 1. It is classified as having a less than 1 in 1,000 year annual probability of fluvial flooding and is therefore at low risk. This is confirmed in the SFRA2 (EX/NBC/06c(viii), pg 15). However, to assist the Inspector's consideration of the site, the following wider sustainable development objectives are relevant. Delivery of the TB19 site will significantly increase the supply of housing, including the consideration of specialist accommodation in the Borough to meet the Council's housing requirement. The site would provide a policy compliant level of affordable housing to help meet locally identified need. The site provides for and will build part of a new safeguarded transport route through the site with the aim of supporting a transport link from the A53 Whitmore Road, through the site, up to the A525 Keele Road. As well as providing housing, the site provides for strategic open space to the southwest of the site which provides for a buffer to the M6 but also recreational opportunities and access to open space. The site will also provide contributions towards improvements in the capacity of local schools and health facilities. Separately, the site promoters of site TB19 [EX/NBC/49, Appendix 1] have confirmed that: - • The majority of the site is at low risk of pluvial flooding with the northern and southernmost site boundary both shown as being at an increased risk from surface water flooding. However, this is considered as being consistent with the existing brook and ditch network. The EA mapping also indicates a flow route through site, which is associated with its general topography. • The development parcels are identified in areas of lower risk • The site will utilise an on-site attenuation system and utilise SuDs features close to source. The development will look towards the

	use of tree pits, bio-retention areas, conveyance swales and permeable paving; all of which will capture and discharge surface water runoff close to their source. Surface water storage is primarily going to be provided in attenuation basins.
TC40 'Blackfriars Road'	The site is adjacent to Lyme Brook. The southeast corner is potentially impacted by fluvial and surface water flooding but only 1% of the site is at risk. The SFRA2 notes that if 'more vulnerable' development is proposed within the extent of Flood Zone 3a then an exception test is required (EX/NBC/06c(x), pg 19). However, as highlighted in Plan 1 in Appendix 1, the extent of flood zone 3 at that site is limited and would not impact upon the delivery of the site, in the Council's judgement. The following sustainable development objectives are relevant to the site. The delivery of a brownfield site will increase the supply of housing in Newcastle-under-Lyme Town Centre, the Strategic Centre of the Borough in an area located close to services/facilities. The site would provide improvements in footway access to the towpath and financial contributions to improvements in the capacity of local schools and health facilities
Site G&T11 Land at Hardingswood Road	According to the SFRA2 [EX/NBC/06c(vi), pg 15], the NPPF classifies Travelling Showperson uses as 'Highly Vulnerable'. The exception test is currently shown to be required for this site because the northern extent of the site is located within Flood Zone 2. 'Highly vulnerable' development is not permitted in Flood Zone 3. However, the SFRA 2 notes that [EX/NBC/06c(vi), section 2.3.2, pg.], the fluvial flood risk shown to this site is not reflective of the site topography and therefore a site-specific FRA may be able to show that the site is not at fluvial flood risk and as such the exception test is not required. However, to assist the Inspector's consideration of the site, the following wider sustainable development objectives are relevant. The site is an existing authorised Travelling Showperson site. There is no reasonable prospect in the Local Plan of an alternative site being identified in a lower risk flood zone in a nearby location. The Council has undertaken a detailed site selection process (ED019) and determined that the site is suitable for intensification of use. The delivery of this site will go towards meeting the needs of Travelling Showpeople in the Borough as set out and in compliance with HOU4 Gypsy, Travellers and Travelling Showpeople.

SFRA Level 2 – Amber Sites for Surface Water Flood Risk

10. The Inspector's letter, in paragraphs 13 and 14 requested, that the Council review Local Plan allocations in the light of the outcomes of the SFRA2, particularly in respect of surface water risk. The Inspector has asked whether the assumptions as to the likely pattern of development on allocated sites take account of the likely disposition of surface water flooding and its depth

and velocity. In addition, the Inspector has asked the Council to consider any implications on the indicative yield of sites.

11. For clarification, the Council has removed from Table 2, those sites recommended for non-inclusion in the Local Plan from the Inspector in her post hearing views [EX/INS/06]. Table 2 also does not include sites with planning approval (as set out in EX/NBC/11), as the matter of flood risk would have been considered during the determination of the planning application, as relevant.
12. Following the preparation of the Level 2 SFRA, the Environment Agency published the outputs of their National Flood Risk Assessment 2 (NaFRA2) which updated the risk of flooding from surface water (RoFSW) dataset. The Environment Agency has also updated their flood map for planning in March 2025. The Council's consultants, JBA consulting, prepared an addendum (NaFRA2 addendum, EX/NBC/06a) to the SFRA2 to reflect this updated data. This may have implications for the site capacity analysis. JBA consultants have prepared maps (shown in Appendix 1) which show changes between the previous RoFSW dataset, and the new data recently released by the Environment Agency.
13. Furthermore, there has been recent changes to Planning Practice Guidance on Flood Risk and Coastal Change which are relevant considerations. There have been revisions to paragraphs 23, 27 and 28 and the inclusion of a new paragraph 27a inserted on the 17 September 2025.
14. Paragraph 27-027 of the PPG states: "In applying paragraph 175 (of the national planning policy framework) a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."
15. The PPG states that the Sequential Test is not required to consider surface water flooding if it can be shown a development can be made safe from surface water flooding for its lifetime without impacting on flood risk elsewhere. Therefore, on the basis that can often be demonstrated within a site-specific FRA, there may not be a requirement to consider the Sequential Test for surface water. As such, there is potential for areas currently shown as being at medium and high risk of surface water flooding to be developed without triggering the need for a sequential test and that these matters can be suitably addressed at the planning application stage.

Table 2: SFRA2 and Site Capacity Analysis

Site Ref	Address	Commentary
KS3	Land at Blackbank Road	Site removed in Inspector's Post Examination Hearing Advice [EX/INS/06, pg 8].
KL13	Keele Science Park, Phase 3, University of Keele	KL13 benefits from outline permission for development and has facilitated the provision of SuDs attenuation on the site [planning references 20/00162/REM & 17/00934/OUT respectively].
TB23	Land West of Galingale View	The statement of common ground with the Environment Agency notes how a detailed hydraulic model should be prepared to inform the developable area, including a site-specific flood risk assessment with mitigation to reduce flood risk [EX/SCG/08, pg16/17]. The SFRA Level 2 [EX/NBC/06c(ix) considers the site. The exception test is not required as the site is in the fluvial flood zone 1. There are two ordinary watercourses which cross the site. Development should be steered away from areas of higher risk and the flow path. The site promoter has also undertaken its own flood risk assessment work, prepared by RSK. A masterplan for the site (which is included in Regulation 19 representations, NULLP963) demonstrates how areas of surface water flooding, evident along two ordinary watercourses which cross the site, can be avoided in the masterplanning and development of the site – for both future development parcels and the site accesses. This is in line with the requirements of Policy TB23, which states: “6. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking account flood risk from all sources including surface water flooding.” The site promoter is currently undertaking more detailed site-specific flood risk assessment work to inform a deliverable scheme layout for the site – in accordance with the key policies in the Submission Plan (including policies SE3, SE4, SA1 and TB23). Based on the emerging work, it is considered that the site can be delivered at the capacity proposed in Policy TB23 (124 units), which would be at a density similar to the adjacent sites at The Hampton's and Milliners Green – which have been developed at an average density of 37 dwelling per hectare.
AB12	Land East of Diglake Street	Site removed in Inspector's Post Examination Hearing Views, EX/INS/06, pg 5

TK17	Land off St Martins Road	There are areas of medium surface water flood risk to the western portion of the site boundary. This is shown in Plan 3 of Appendix 3a and 3b. It is considered that the orientation of the site can be arranged to provide for in the order of 40 dwellings. In addition, there are mitigation measures, such as elevating the floor level for units located in the west of the site to mitigate for potential impacts. The site promotor has provided additional information which confirms this position, set out in Appendix 3a and 3b, alongside a masterplan which shows that open space is directed to the west on the site.
TK27	Land off Coppice Road	A letter has been submitted by the site promoter (appendix 2a and 2b) which includes further assessment from a drainage consultant Brookbanks, and concludes that the proposed quantum of development on the site, circa 90 dwellings, is achievable. Of the 2.823 ha site, the masterplan submitted by the site promoters assumes a developable area of only 2.2 hectares, which if developed at 40 dph equates to approximately 90 dwellings As the letter from Brookbanks identifies in appendix 2a and 2b, the latest data suggests that the overall area of medium and high-risk surface water flooding equates to only 7.5% of the site. But even in the worst-case scenario identified in the SFRA, only 14% of the site falls within the 1% AEP (see EX/NBC/06b: Appendix A Site Screening Spreadsheet). Again, it is considered that this could be comfortably accommodated within the green infrastructure framework without affecting the overall quantum of developable area or number of dwellings. A masterplan, submitted by the developer through their Regulation 19 submission (NULLLP843) can be suitably delivered.
NC13	Land West of Bullockhouse Road	A planning application has been submitted on the site for 96 dwellings (ref 25/00358/FUL) (a reduction from 100 dwellings). A drainage management strategy and flood risk assessment has been undertaken and submitted in support of the planning application on the site. Further engagement is currently being undertaken with Staffordshire County Council as local lead flooding authority. It is considered that in the order of 96 dwellings can be delivered on the site.
CH14	Maryhill Day Centre	The site is bounded by areas of high risk of surface water flooding. There is a small risk of surface water flood risk (shown on Plan 6, Appendix 1) focused on the existing building. Following engagement with Staffordshire County Council, in their land owner capacity, there has been no known flooding issues on site and existing connections exist to the drainage system. There are no

		impacts on the site capacity envisaged as a consequence of surface water flood risk on the site.
TC7	Land Bound by Ryecroft	The site has resolution to grant planning permission for 175 dwellings (24/00840/FUL).
TC52	Goose Street Car Park	Goose Street Car Park was identified as an 'amber site' in the SFRA2 due to potential surface water flood risks. However, following the completion of the addendum to the SFRA2 [EX/NBC/06a, pg 14], it has been determined that there has been a reduction in area of the site at low risk of surface water risk and now there were no surface water risk on the site. Therefore, there are no impacts on the site capacity envisaged as a consequence of the surface water flood risk on the site. This is highlighted on Plan 7 of Appendix 1 of this note.
SP11 (1)	Lyme Park	There are areas of surface water flood risk in the site (1) Keele Square. The surface water drainage will be attenuated to the equivalent greenfield runoff and attenuation provided to contain the 1:100-year return period event with a 40% allowance for climate change before the controlled discharge is connected to the culverted watercourse. It is considered that there are no impacts on the overall capacity of the site and the surface water drainage implications can be suitably mitigated through SuDs and other mechanisms.
Site 8	Land West of Silverdale Business Park	Site removed in Inspector's Post Examination Hearing Views, EX/INS/06, pg 8

16. In general terms, it should also be noted that for each allocation in the Local Plan, there is a paragraph in the supporting information which states: -

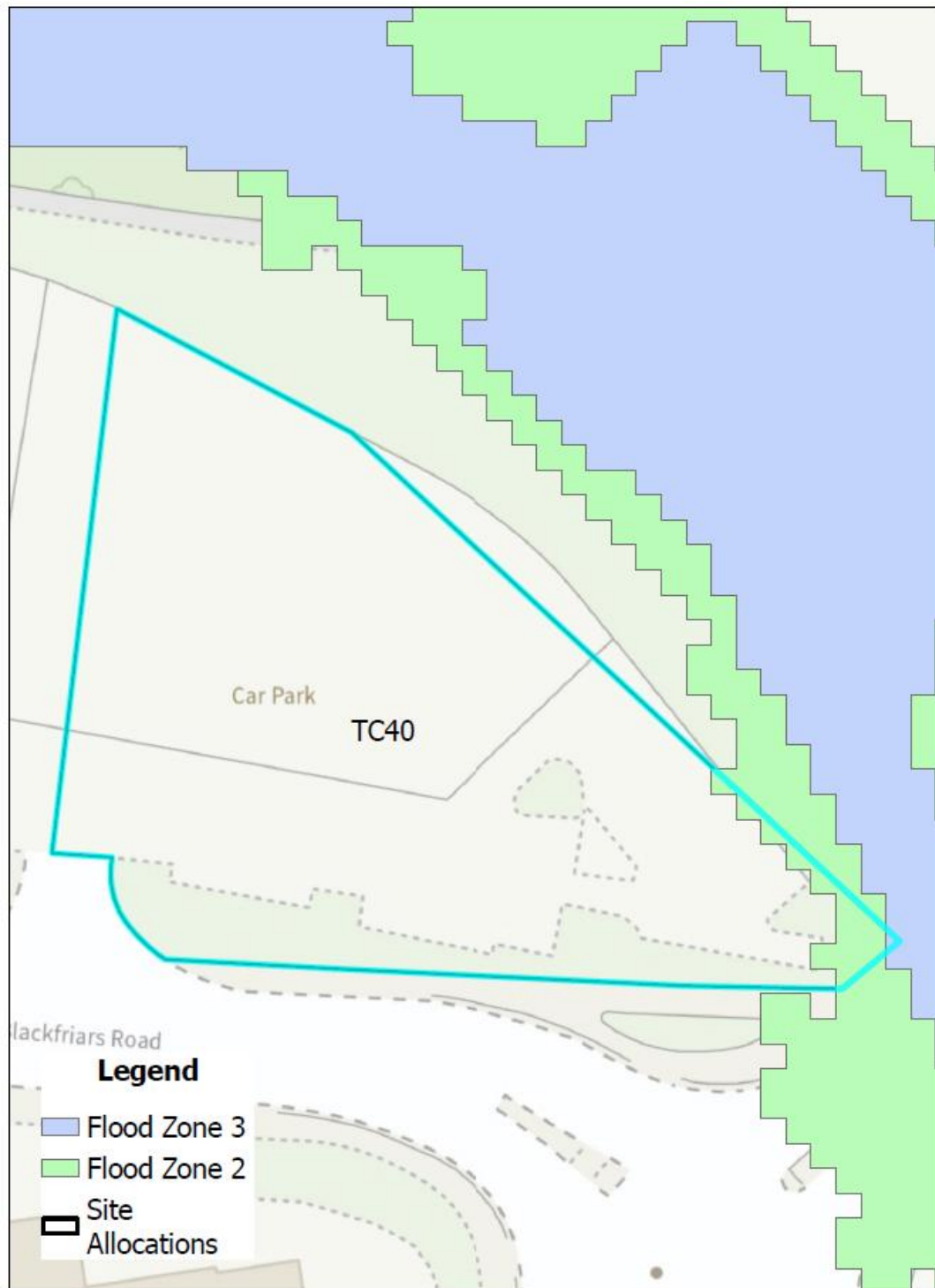
"Allocation of a site establishes the principle of a particular use. Any future planning application(s) will be determined in accordance with the relevant policy criteria applicable to the site, other relevant policies in the Local Plan and any other material considerations. As such, the detail provided at the planning application stage may result in minor adjustments to the overall quantum of development achieved on the site".

17. Therefore, the Local Plan anticipates that there may be minor changes in the overall quantum of development on site as planning applications come forward but there is a sufficient supply buffer to ensure that the development requirements of the Local Plan are met over the Plan period.

18. Through this note, it has been demonstrated that the allocations in the Plan identified as 'amber' in the SFRA for surface water impacts can still provide for 'in the order' of the development requirements identified in the Local Plan.

Appendix 1: Site Plans

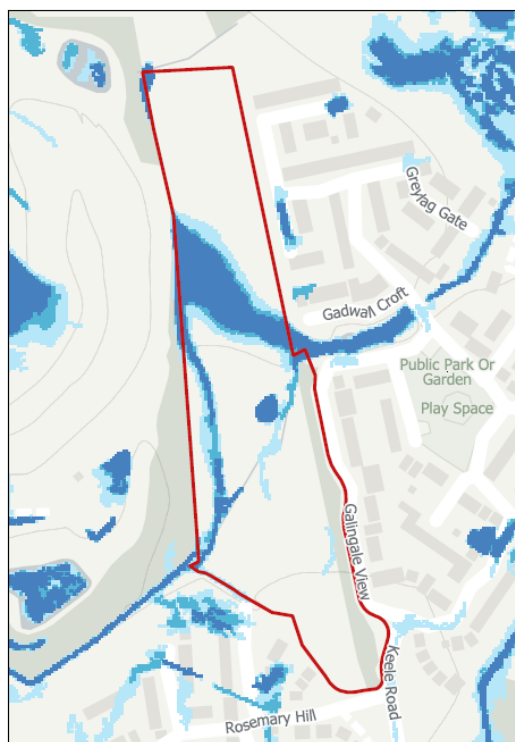
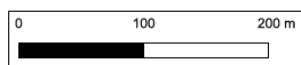
Plan 1: Site TC40 Blackfriars Road



N **TB23**
Land West of Galingale View, Thistleberry



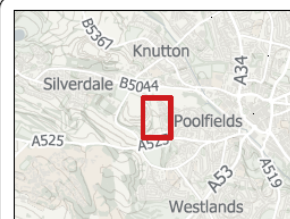
Previous RoFSW mapping



New RoFSW mapping

1 Broughton Park
 Old Lane North
 Broughton
 Skipton
 North Yorkshire
 BD23 3FD
 +44 (0)1756 799 919
 info@jbaconsulting.com

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Risk of Flooding from Surface Water (RoFSW)

- Newcastle-under-Lyme Borough Council
- Site boundary
- High Risk (>3.3% Annual Probability)
- Medium Risk (1% to 3.3% Annual Probability)
- Low Risk (0.1% to 1% Annual Probability)
- Very Low Risk (<0.1% Annual Probability)

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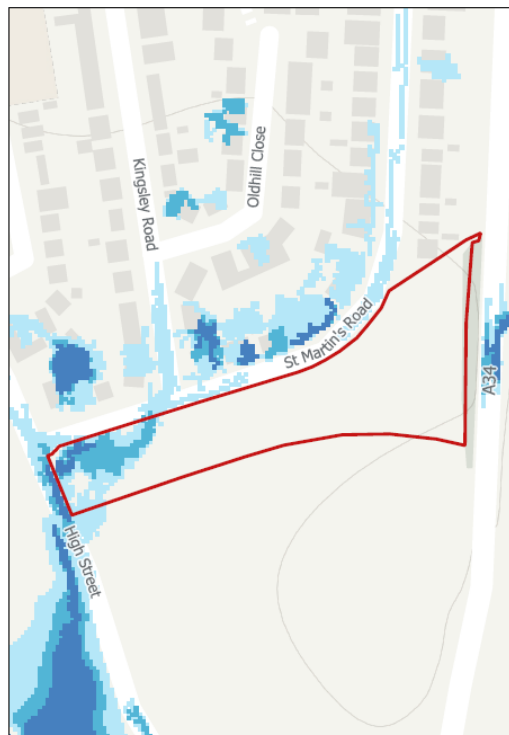
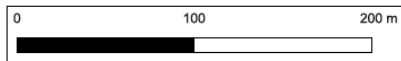
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Plan 3: Site TB17 Land Off St Martins Road, Talke

TK17 Land off St Martins Road, Talke



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Old Lane North
Broughton
Skipton
North Yorkshire
BD23 3FD
+44 (0)1756 799 919
info@jbaconsulting.com

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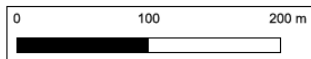
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Plan 4: Site TK27 Land off Coppice Road, Talke

TK27 Land off Coppice Road, Talke (2)



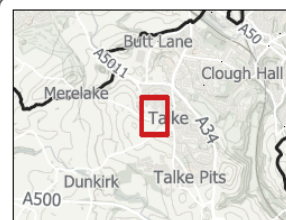
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Old Lane North
Broughton
Skipton
North Yorkshire
BD23 3FD
+44 (0)1756 799 919
info@jbaconsulting.com

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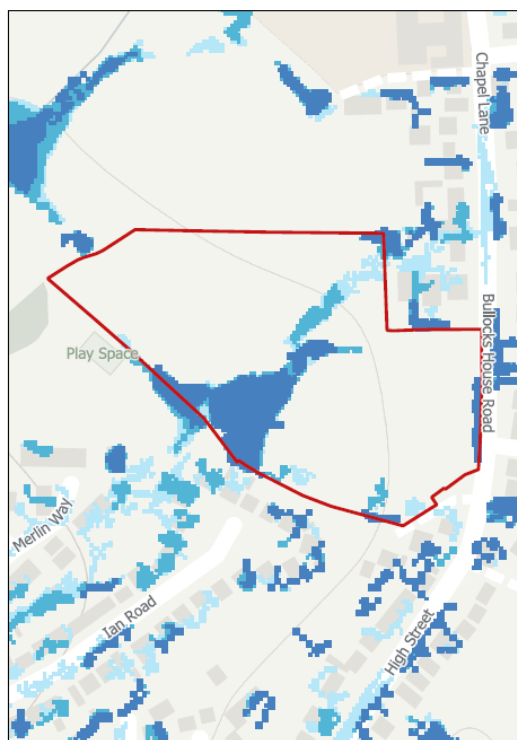
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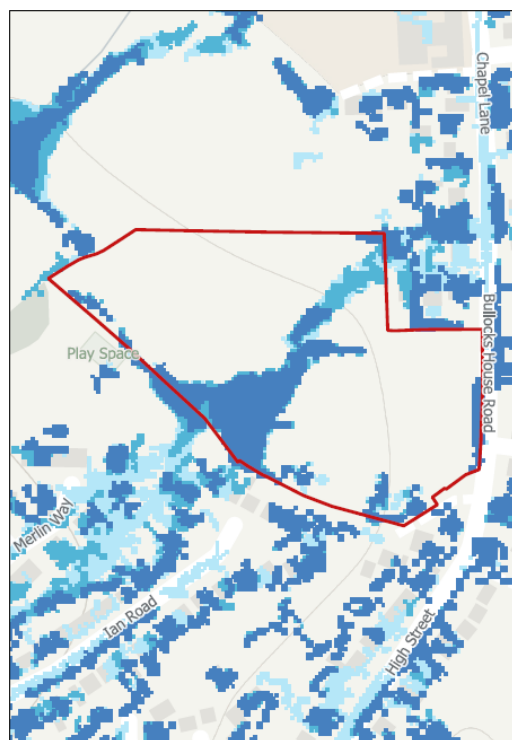
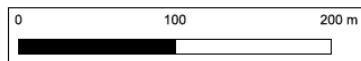
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NC13
Land West of Bullockhouse Road, Harriseahead



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 Old Lane North
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Risk of Flooding from Surface Water (RoFSW)

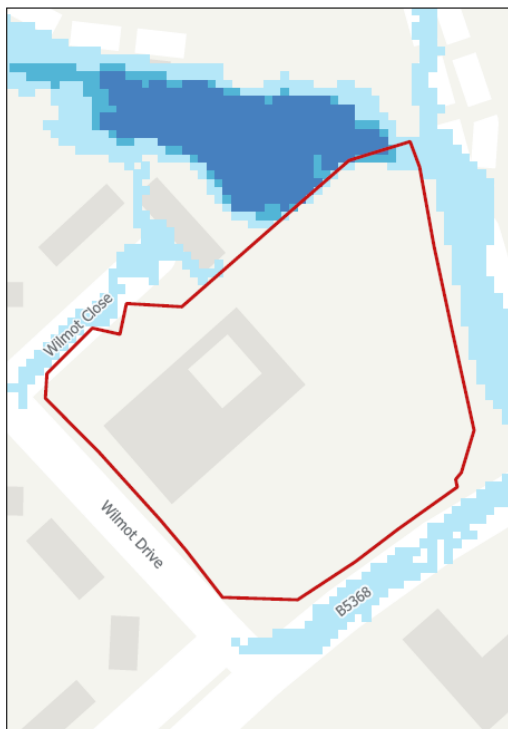
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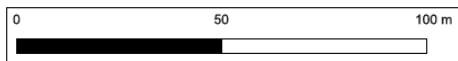
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Plan 6: Site CH14 Maryhill Day Centre, Wilmott Drive, Cross Heath

N CH14 Maryhill Day Centre, Wilmott Drive, Cross Heath



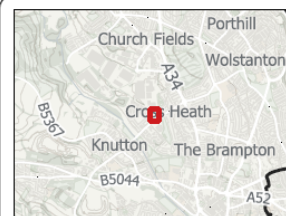
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Broughton
Skipton
North Yorkshire
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+44 (0)1756 799 919
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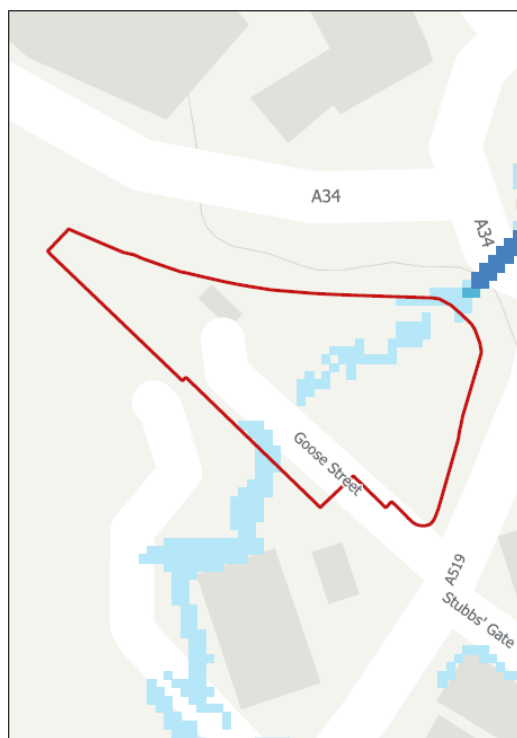
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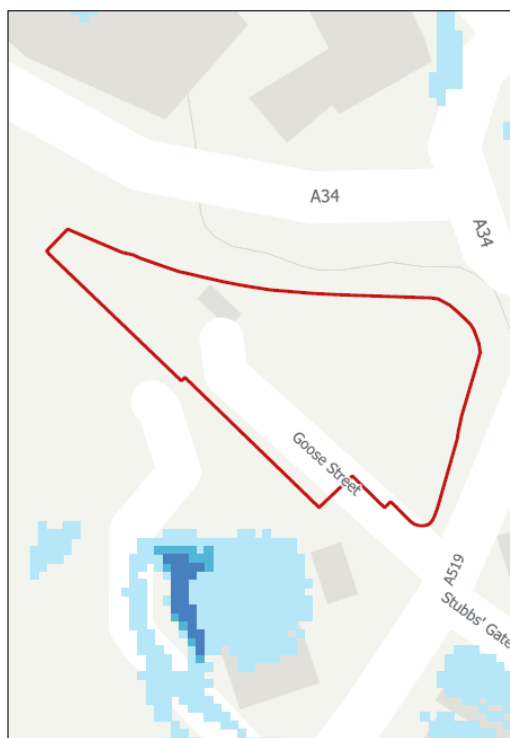
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Plan 7: Site TC52 Goose Street Car Park

N TC52 Goose Street Car Park



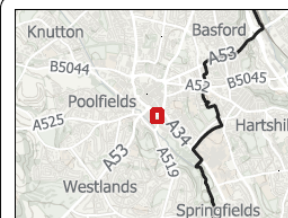
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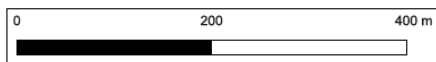
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Plan 8: Site SP11 (1) Former Keele Municipal Golf Course, Plot 1

N SP11 (1) Former Keele Municipal Golf Course, Plot 1



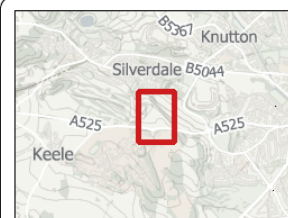
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Old Lane North
Broughton
Skipton
North Yorkshire
BD23 3FD
+44 (0)1756 799 919
info@jbaconsulting.com

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- Low Risk (0.1% to 1% Annual Probability)
- Very Low Risk (<0.1% Annual Probability)

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