

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Council
AUTHOR: Director of Development Services

23rd March 2005.

**SOUTH CAMBRIDGESHIRE LOCAL DEVELOPMENT FRAMEWORK:
NORTHSTOWE AREA ACTION PLAN
FOR SUBMISSION TO SECRETARY OF STATE**

Purpose

1. A working meeting to consider the emerging content of the draft Northstowe Area Action Plan. A final version will be brought back to Members at the Council meeting of 9th May, to determine the plan for Submission to the Secretary of State. Members are reminded to bring to the meeting the Northstowe Preferred Options Report and the Sustainability Appraisal Scoping Report, both published in October 2004.

Effect on Corporate Objectives

2. High quality, accessible, value for money services.	<ul style="list-style-type: none">• Assist the Council's objectives to deliver quality accessible development in the district.• The provision of affordable housing and the effective delivery of sustainable development at Northstowe and other major developments on the edge of Cambridge and development of sustainable communities.• Assist the delivery of the Community Strategy.• Be used by Cambridgeshire Horizons (formerly the Infrastructure Partnership) to help the early and sustained development of the necessary services and infrastructure.
Quality village life.	
A sustainable future.	
A better future through Partnerships.	

Background

3. The Council published Preferred Options Reports for a number of Development Plan Documents on 1st October 2004. Supporting Studies were also published for consultation. Public participation on the matters raised in these reports took place over a six-week period ending on 12th November.
4. The Preferred Options Reports covered:
 - Core Strategy and Development Control Policies
 - Rural Centres
 - Northstowe Area Action Plan
 - Cambridge Southern Fringe Area Action Plan
 - Cambridge East Area Action Plan (prepared jointly with Cambridge City Council)

The supporting studies published as consultation drafts were:

- Sustainability Appraisal Scoping Report
 - Urban Capacity Study
 - Recreation Study, including Annexe 1 - the Village Results.
5. Some 5,500 representations to all the Preferred Options Reports and Studies were received in total, of which just over 3,000 related to Northstowe.
6. The Preferred Options report was prepared under the “jumping the gun” regulations in the lead up to the new system of plan making which did not come into force until September 2004, after Council had agreed the reports. The new system requires the preparation of a Local Development Scheme which sets out the LDF documents that a local authority intends to prepare over the next three year period and a timetable for their preparation. On 9th December 2004, Cabinet agreed a draft Local Development Scheme which lists the documents (both Development Plan Documents and Supplementary Planning Documents) which the Council intends to prepare over the next 3 years. This will be submitted formally to the Government Office (GO-East) towards the end of March.
7. Members considered responses to the Preferred Options Reports and background studies at a series of full Council Meetings. The Northstowe Preferred Options Report, was considered on 1st and 11th February 2005.

The Next Steps

8. This is the second of a series of meetings of Council to consider the policy approach in the draft Development Plan Documents: Core Strategy / Development Control Policies / Site Specific Policies (15th March), Northstowe (23rd March with 26th April as a reserve date if necessary), Cambridge Southern Fringe (8th April) and Cambridge East (15th April). A final meeting of Council on 9th May is programmed to deal with any amendments which need to be considered as a result of any of the previous meetings or the findings of the independent Sustainability Appraisal / Strategic Environmental Assessment, and determine the Local Development Framework for submission to the Secretary of State. 20th May has also been reserved as a fall-back position if required.
9. LDF documents will be submitted to the Secretary of State in June 2005. They will then be subject to public participation for a six-week period. An additional participation period on objectors’ sites is scheduled for October 2005. It is envisaged that the Public Examination will start in February 2006, with the Inspector’s binding report being received late 2006 with adoption end 2006/early 2007.

The Main Issues to be resolved

12. Attached to this Agenda Item are the following Appendices:
- Appendix 1: Draft Northstowe Area Action Plan
 - Appendix 2: Draft Proposals Map
 - Appendix 3: Draft Concept Plan
 - Appendix 4: Longstanton Conservation Area/Green Separation

Approach to drafting the Draft Northstowe Area Action Plan

1. Members provided a clear steer on the policy direction to be incorporated in the Northstowe Area Action Plan at the Council meetings on 1st and 11th February, when considering the representations received as a result of public participation on the Preferred Options Reports.
2. The Preferred Options Reports focused on key issues for the Area Action Plan and issues where there were choices to be made on the policy direction. They did not cover all issues to be included in the Area Action Plan. For example, there are a number of issues that are consistent with the Structure Plan and PPGs and should be included in the Area Action Plan. In addition, any revisions to Government guidance published after the Preferred Options Reports have been prepared have been taken into account in drafting of the Northstowe Area Action Plan. The Major Projects Team has also provided advise on the deliverability of policies.

Sustainability Appraisal / Strategic Environmental Assessment

3. Under the new system of plan making, a key aspect to the preparation of plans is the use of Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) to help test evolving options and policies and ensure that the most sustainable are pursued. It also provides valuable information for those considering policies through the participation process, enabling them to make an informed decision on their representations.
4. A Scoping Report was prepared by the Council, ahead of the preferred options reports to identify relevant sustainability issues in the district, develop sustainability objectives, decision-making criteria and indicators against which to test the plan. This report has already been subject to public participation at the preferred options stage, and Members agreed a set of changes to it at the Council Meeting of 20th January 2005.
5. The Draft Northstowe Area Action Plan will be subjected to full SA / SEA appraisal by independent consultants, following the methodology approved in the Scoping Report. The sustainability assessment will include an appraisal matrix for each policy, detailing how it scores against the sustainability objectives developed through the Scoping Report. Testing will include consideration of potential short, medium and long term effects, secondary, cumulative and synergistic effects.
6. The Final Sustainability Report will be a complete report, explaining the process, and also including a publicly accessible summary. This will be put before members at the Council meeting of 9th May together when Council will be invited to agree the Northstowe Area Action Plan for submission to the Secretary of State.

DRAFT NORTHSTOWE AREA ACTION PLAN

7. The document broadly follows the structure of the Preferred Options Report but has been divided into five sections:
 - A. Introduction
 - B. Vision and Development Principles
 - C. The Site and Its Setting
 - D. The New Town
 - E. Delivering Northstowe

Part A: INTRODUCTION AND VISION

8. An introduction to the Area Action Plan, explaining its content, form and status, the preparation process, and links to other documents such as the Community Strategy. The introduction also sets out the process for public involvement following submission to the Secretary of State.
9. The full extent of the Area Action Plan is set out in the Introduction which includes not just the site for Northstowe but also the surrounding countryside where landscaping, access, surface water drainage and other matters relating to the development and mitigation of the town will need to be planned. The Area Action Plan does not include the villages of Longstanton and Oakington. The Area Action Plan includes the land required for Green Separation with the exception of land within the Longstanton Conservation Area(s) which are part of the setting of the village. Whilst these areas will also lie within the Green Separation where any additional landscape treatment is necessary will be funded by the development, the policies for these Conservation Area(s) are more directly relevant to maintaining the character of Longstanton village itself. The Conservation Advisory Group is considering revisions to the Conservation Area at Longstanton St Michaels and the Northstowe Area Action Plan/Longstanton Village Inset in the submitted plan will be amended if necessary.
10. Where the Core Strategy includes policies which are also relevant to the development of Northstowe, they are not repeated in the Area Action Plan but reference to those policies is often included. For example, the Core Strategy policies for development in the Green Belt (GB/2) will apply to the extended Green Belt which will be covered by the Area Action Plan as will the policies for Sustainable Development (DP/1), Design of New Development (DP/2), Infrastructure and New Developments (DP/4) and Construction Methods (DP/6). These are only some of the key examples and it is not intended as an exhaustive list.

Part B: VISION AND DEVELOPMENT PRINCIPLES

11. The vision from the Preferred Options Report (NS4) as amended by members provides the simple vision for the development of Northstowe. The individual components of the vision which were listed in NS4 of the Preferred Options Report have been split with those aspects of the vision which are relevant to the physical disposition of development being incorporated into a new Structural Policy in Part D. Those aspects which are Development Principles and which set out overarching

principles which will be relied upon to guide the interpretation of the subsequent detailed policies and proposals are kept in Part B.

Part C: SITE AND SETTING

12. This section defines the site for Northstowe, the extension of the Cambridge Green Belt to surround Northstowe and the landscape treatment of its setting. The setting includes the Green Separation between Northstowe and Longstanton and Oakington but landscaping of the edges of Northstowe are included within the site (Part D).
13. As the choice of the site has been based on Structure Plan policies and national planning principles in Planning Policy Guidance Notes/Planning Policy Statements (PPGs and PPSs), this section has objectives for meeting the Structure Plan policy requirements for choosing the site as well as the extension of the Cambridge Green Belt and the landscape setting of Northstowe.
14. The policies allocate Site A from the Preferred Options Report as agreed by Council and extend the Cambridge Green Belt as far as Rampton, Willingham and Over to fully encompass Northstowe. Also included is policy guidance on the appropriate landscape treatment of the wider landscape surrounding Northstowe which will be necessary to mitigate the impact of development and integrate Northstowe into its countryside setting.
15. The final policy deals specifically with the extent and landscape treatment of the Green Separation between Northstowe and Longstanton and Oakington. That part of the Green Separation within the Conservation Area between Long Lane and the village needs to be a proposal within the Site Specific section of the Core Strategy. In order to ensure an holistic approach to the whole of the Green Separation, this issue is dealt with in this report. See Appendix 4.

Part D: THE NEW TOWN

16. This is of necessity a more lengthy part of the Area Action Plan and provides objectives and policies for the development of the town as a whole. This includes:
 - D1 Structural Policy and Concept Plan
 - D2 Town Centre
 - D3 Local Centres
 - D4 Housing
 - D5 Employment
 - D6 Community Services and Facilities
 - D7 Transport
 - D8 Landscape
 - D9 Biodiversity
 - D10 Archaeology and Heritage
 - D11 Recreation
 - D12 Land Drainage, Foul Drainage and Water Conservation
 - D13 Telecommunications
 - D14 An Exemplar in Sustainability
 - D15 Waste

D1 Structural Policy and Concept Plan

17. A policy covering the physical structure of Northstowe which is accompanied by a Concept Plan showing the distribution of the key components of the town. These will provide the basis for subsequent masterplans which can be prepared by the developers of Northstowe or by the Council to show in more detail how the principles of the Structural Policy will be interpreted for the development of Northstowe.

D2 The Town Centre

18. Three policies which locate the town centre at the centre of the site but physically separate from Rampton Drift, provide guidance on the overall format and function of the town centre (retail and social) and include a requirement for a Supplementary Planning Document to provide guidance on the overall size of the town centre and individual units, the mix of uses, urban design principles and any measures required to provide early support for the development of the town centre. The Supplementary Planning Document will include a strategy tying the development of key retail, services and other facilities in the town centre to stages in the development of the housing at Northstowe.

D3 Local Centres

19. There will be 5 local centres within Northstowe which will provide services and facilities to meet the day-to-day needs to the different parts of the town. These will be based on the 5 primary schools that will be needed once the development of Northstowe is completed.

D4 Housing

20. The housing section includes objectives and policies which are specific to Northstowe. Certain of the Core Strategy policies will also apply e.g. HS/2 on housing mix. There are policy requirements that 6,000 houses are completed by 2016, that development will be at an average of at least 40 dwellings per hectare, that there will be a variety of house types which will encourage sustainable living and that the Core Strategy targets for affordable housing will apply. The affordable housing target will only be varied in exceptional circumstances where there are insurmountable subsidy issues.

D5 Employment

21. Core Strategy policy EM/1 will apply to Northstowe to ensure that employment at the new town contributes to the strategy for the selective management of employment based on the strengths of the Sub-Regional economy rather than attracting employment which does not need to be close to Cambridge. The policies in the employment section allocate the equivalent of 20 hectares of employment land at Northstowe (the Structure Plan indicative target of 20 hectares is based on historic levels of provision on low density business parks rather than high density development as at Northstowe). This will take the form of a relatively large B1 employment area around and adjoining the southern end of the town centre, small scale provision B1 employment at each of the local centres and a 5 hectare site for

B2 and B8 uses adjoining the Park & Ride site at the northern end of Northstowe. Together with employment in the shops, services and other facilities at Northstowe this will provide a good mix of employment.

D6 Community Services and Facilities

22. This section includes a policy requirement that Northstowe includes a full range of publicly provided services and facilities which will be funded in full either by the development or by taking a contribution from the development and maximising public funding from service and infrastructure providers. Innovative means of provision, including opportunities for joint provision and co-location to provide services which best meet people's needs and which are cost efficient to service and facility providers will be important for the creation of a sustainable new town.
23. Policies go on to provide for Northstowe to meet the needs of the town and the immediately surrounding villages and that planning obligations will require the phased delivery of publicly provided community services, facilities, leisure, art and culture, with the provision of key services and facilities for early phases of the development, including the provision of Community Development Workers as well as key commercial facilities. Services and facilities will be located in the town or local centres according to whether they serve the whole population of Northstowe or just a local area. Provision is also made for public art to play a key role in creating a distinctive character for Northstowe.

D7 Transport

24. The transport policies start with the very simple principle that adequate highway capacity must be provided to serve all stages of development. Development will not be permitted to start until the A14 road improvements are in a firm and irreversible road programme and that the occupation of development will not be permitted until appropriate improvements to the A14 have been implemented.
25. Primary road access will be designed and located to minimise adverse impacts on the landscape and existing houses and will comprise:
- An improved Hattons Road from the A14 and a new road into the southern end of Northstowe;
 - A new access from the Longstanton West Bypass / Station Road, Longstanton into the northern end of Northstowe;
 - A new link road from the A14 in the vicinity of the existing Dry Drayton junction into the southern end of Northstowe.
26. There will be an emergency access, not open to other motor vehicles, into Northstowe from Station Road, Oakington and traffic management measures will be required to minimise traffic impacts on nearby villages. At its meeting on 11th February Council added a policy to the effect that if at the time of grant of outline planning permission a Willingham bypass is required by the County Council, Northstowe will be required to make a contribution related to the volume of traffic

generation forecast to be attributed to the new town. Subsequent dialogue with the County Council suggests that a Willingham Bypass will not be required but that traffic management measures on the B1050 may be developed further.

27. The maximum car parking standards from the Core Strategy will apply.

D8 Landscape

28. The proposed landscape policies will require a landscape strategy for Northstowe to be prepared and approved prior to the grant of planning permission for Northstowe. This will make provision for surface water to be a defining feature of the fen edge town and provide guidance on the landscape treatment of the edges of the town adjoining the former St Ives railway line, Longstanton Road (between Longstanton and Oakington) and the B1050 north of Longstanton village. Rampton Drift is required to be landscaped to recognise that it will be within Northstowe but that the amenity of its residents will need to be protected.
29. The landscape strategy within the town will include the creation of 'green corridors' which reach into the town and connect to the surrounding countryside. Existing landscape features will be retained and enhanced wherever possible. Policies also provide for appropriate landscape treatment of access roads, the general landscaping of the town and its open spaces, and a Town Park. In recognition of the large amounts of construction spoil that will be generated at Northstowe a specific policy for spreading spoil evenly across the site rather than creating alien landscape features is included. Finally a policy concerning landscape management measures which must be approved before development is occupied.

D9 Biodiversity

30. Policies are aimed at securing a net increase in biodiversity as a result of the development. This will be secured through a requirement for a full ecological survey of the site and for the developers to prepare a strategy for the protection and enhancement of biodiversity. Specific proposals include the creation of wetland habitats within the surface water attenuation system, a southern parkland country park, adjoining Oakington, a fen-edge landscape in the Northern Country Park, and maximising the biodiversity potential of 'green corridors' within the town and the Green Separation at Longstanton. The policies provide for the 'green corridors' to connect to the wider countryside to encourage wildlife to become part of the character of the town. Finally a biodiversity management plan will be required to maintain and fund biodiversity, including the appointment/part funding of a Project Officer.

D10 Archaeology and Heritage

31. Policies for archaeology and heritage require a full survey of the site and the retention of key structures particularly those which portray the history of Oakington Airfield as a Second World War airfield. Whilst there are no Ancient Monuments, a full archaeological survey is also required as part of the Core Strategy and any significant finds are to be excavated or retained in situ as appropriate.

D11 Recreation

32. The policies begin with a requirement that a strategy for sports provision be prepared for approval by the local planning authority. The requirements of the strategy will be funded by the development. A preliminary list of facilities is included. The main public indoor sports facility will be based at the secondary school to allow for dual use. More than one large outdoor sports area providing pitches, tennis courts etc will be located such that no home in Northstowe is more than 1000m from such a facility which will also be located such as not to have an adverse impact on the character or amenity of the town or neighbouring villages.
33. Policies include provision for children's play according to the following formula:
 - No home will be more than 60m from a Local Area for Play (LAP).
 - No home will be more than 240m from a Local Equipped Area for Play (LEAP).
 - No home should be more than 600m from a Neighbourhood Equipped Area for Play (NEAP) or Space for Imaginative Play (SIP).
34. A town park is proposed within or adjoining the town centre which will include some sports uses which would be appropriate to the character of such a park e.g. outdoor bowls and tennis.
35. Open spaces including green corridors and the water park will also be available for information recreation and children's play.
36. The final part of the policies for recreation cover the phasing and management of provision.

D12 Drainage and Water

37. Provision will be made for a sustainable drainage system for surface water disposal comprising a series of channels within green corridors draining to a water holding area comprising a series of linear lakes on the eastern boundary of the site where a water park will be created. Water will only be released into the surrounding water courses at a rate no greater than if the site was undeveloped. As a result of representations, a criteria based policy is included for foul drainage requiring that sufficient sewage treatment capacity exists for all stage of development, that any receiving sewage treatment works has sufficient capacity to ensure that untreated sewage is not discharged into any watercourse and that treated water will not exacerbate flood risk in any receiving water courses.
38. Current Flood risks affecting Oakington village will be mitigated by policies which include a balancing pond for Oakington Brook associated with the southernmost access road from the Dry Drayton/A14 junction and if proven practicable, support for an Environment Agency promoted scheme to create a new channel between Oakington and Northstowe. Flood risk at Longstanton will be alleviated by a balancing pond for the Longstanton Brook upstream of the village as part of the surface water attenuation proposals for the northern access road for Northstowe.

39. A second criteria based policy is included setting the requirements for a body which will be required to take the management responsibility for the town's surface water drainage systems. The proposed policy requires that no development will be occupied until the local planning authority has agreed that a body has come forward/been established with sufficient funding, resources and expertise to maintain and manage the surface water drainage systems and has legally committed to do so in perpetuity.
40. The Preferred Options Report included an option for water conservation which has generally been supported but did not include any measurable targets for water reduction. A policy has been drafted setting a target of at least a 25% reduction as a result of water conservation/efficiency measures compared to a development with no such measures. Meeting a target of at least 25% will require for water metering, water efficient toilets etc, greywater recycling and rainwater harvesting – measures which will be necessary if the rate of development in one of the driest parts of the country is to be substantially increased.

D13 Telecommunications

41. This section deals with the importance of ensuring that infrastructure can respond to changes in technology over the period of the development. The development of an entirely new town provides the opportunity to ensure that all telecommunications infrastructure is designed and installed as an integral part of the development.

D14 An Exemplar of Sustainability

42. This section deals with the opportunities for Northstowe to include projects which are exemplars of sustainable practice in terms of energy conservation, the provision of renewable energy, high standards for water conservation and water recycling and the use of sustainable resources. The starting point is the Core Strategy policies for energy conservation which will also apply to Northstowe which requires that at least 10% of its predicted energy requirements to be generated from renewable sources at Northstowe. Similarly developers will be encouraged to achieve a 10% reduction in CO2 emissions as compared to Building Regulation requirements. These policies are needed to meet the Structure Plan policy for Northstowe to be "example of excellence in the creation of a sustainable settlement" (Policy P9/3)
43. The District Council in partnership with Cambridgeshire Horizons and the Energy Savings Trust, is carrying out a study of opportunities for generating some of the town's own energy needs by harnessing renewable energy. As part of this work, the potential for setting up an Energy Supply Company (ESCO) for Northstowe is being considered.

D15 Waste

44. Provision will be made at Northstowe for a Household Waste Recycling facility although procedurally this proposal will have to be included in the County Council's Waste Local Plan.

Part E: DELIVERING NORTHSTOWE

E1 Phasing and Implementation

45. The Draft Area Action Plan includes a construction strategy whose objective is to minimise and mitigate the impact of the development of Northstowe for existing properties in the vicinity of Northstowe and for Northstowe's future residents. First of all, the construction methods policy in the Core Strategy will apply to Northstowe (policy DP/6). The policies in the Area Action Plan will additionally control site accesses for construction vehicles and require monitoring measures to ensure compliance. Storage compounds, plant and machinery will be located and contained to avoid any adverse impacts on existing and new residents and businesses. All developers will be required to be bound by the 'Considerate Contractors Scheme' which governs such matters as hours of working. A Spoil strategy is also set out which relies upon a general raising of land levels.
46. Early delivery of strategic landscaping for the town as a whole and for specifically for the areas of Green Separation is required to provide a structure for development and to maintain village character during the construction process.
47. A sustainable construction strategy for Northstowe requires policies for the recycling of building materials from the previously developed part of the site, for locating any materials crushing plant as far away from Longstanton and Oakington villages as is possible, and for recycled materials to be used during the construction of Northstowe.
48. Finally, a key aspect of the Structure Plan is increasing the build rate in the Cambridge Sub-Region to 2,800 houses per year. This will require a build rate at Northstowe of approximately 650 dwellings per year without which Northstowe will fail to meet this crucial Structure Plan target.

E2 Planning Obligations

49. The Core Strategy requirement that the development funds all the services, facilities and infrastructure that it requires is the guiding principle for the planning obligations package for Northstowe albeit that funding from all sources will need to be maximised for such a significant scale of development. The section contains a list of the currently known services, facilities and infrastructure requirements which will need to be finalised before planning permission can be granted.

Errata to Core Strategy, Development Control Policies and Site Specific Policies DPD

50. The Northstowe Area Action Plan includes most of the green separation between the town and the village of Longstanton up to the village framework. However, the land that lies outside the village framework and within the Longstanton Conservation Area is shown on the Longstanton Inset Proposals Map to show the whole of the Conservation Area on one map. The map that was in the Core Strategy report to Council on 15 March does not fully reflect the policy proposals emerging from the Northstowe Area Action Plan. The open part of the Conservation Area between the village and Long Lane lies within the proposed extension to the Green Belt and also

within the area of Green Separation between Northstowe and the village. A site specific policy is also necessary to set out the requirement to manage that part of the Conservation Area to reflect its existing landscape character and limit public access to any existing rights of way in order to protect its historic character. It also addresses the need for any landscape enhancements which are necessary for the purposes of Green Separation to be funded by the Northstowe development. A new policy to be inserted into the Site Specific Policies part of the Core Strategy DPD and replacement Longstanton Inset Proposals Maps are attached at Appendix 4.

Financial Implications

51. The cost of progressing the LDF is set out in the Council's budget.

Legal Implications

52. The Planning and Compulsory Purchase Act 2004 imposes a statutory duty to prepare a Local Development Framework and to keep it up to date.

Staffing Implications

53. The programme for the LDF has been compiled having regard to the staffing resources that the Council can commit to planning policy preparation in the context of wider pressures for the early delivery of the development strategy set out in the Structure Plan.

Risk Management Implications

54. The Core Strategy is a key Development Plan Document within the LDF. Given the imperative from the Regional Planning Guidance and the Structure Plan that an early start must be made on the increased rate of development in the Cambridge Sub-region, it is important that the District Council, as the plan-making authority, is able to ensure that development takes place consistent with the LDF. If the LDF is not in place at an early stage there is the risk of developments being determined by the development control and appeal process.

Consultations

55. The Preferred Options Reports that guided preparation of the draft documents have been the subject of extensive public participation.

Recommendations

56. Prior to final approval on 9th May 2005, Council is recommended to:
- i. authorise the emerging policy approach for the Northstowe Area Action Plan to be subjected to independent sustainability/strategic environmental assessment; and
 - ii. delegate to the Planning Portfolio Holder any material changes resultant from further information and to the Director of Development Services authority to approve any minor editing changes.

Background Papers: the following background papers were used in the preparation of this report:

Core Strategy Preferred Options Report, SCDC, October 2004

Draft Sustainability Appraisal Scoping Report SCDC October 2004

Northstowe Preferred Options Report, SCDC, October 2004

Recreation Study Consultation Draft, SCDC, October 2004

Agenda & Minutes - Council 1st & 11th February 2005 (includes responses to Preferred Options Public Participation)

Agenda & Minutes – Council 22nd July 2004 and Northstowe Member Steering Group 6th (Agreed Core Strategy Preferred Options Report and other documents for public participation, and considered results of Statutory bodies consultation)

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