

Public Document Pack

**Democratic Services Section
Legal and Civic Services Department
Belfast City Council
City Hall
Belfast
BT1 5GS**



**Belfast
City Council**

9th May, 2024

PLANNING COMMITTEE

Dear Alderman/Councillor,

The above-named Committee will meet in the Lavery Room, City Hall on Tuesday, 14th May, 2024 at 5.00 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

John Walsh

Chief Executive

AGENDA:

7. Miscellaneous Reports

- (d) Department for Infrastructure Memoranda of Reply to the recommendations of the Public Accounts Committee on the NI Planning System (Pages 1 - 16)

10. Restricted Items

- (a) LDP SA Scoping Report (Pages 17 - 506)



Subject:	Memorandum of Response to Public Accounts Committee report on Planning in Northern Ireland
Date:	14 May 2024
Reporting Officer:	Kate Bentley, Director of Planning and Building Control
Contact Officer:	Kate Bentley, Director of Planning and Building Control

Restricted Reports

Is this report restricted?

Yes

☐

No

☒

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision

After Council Decision

Sometime in the future

Never

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☐
☐
☐

Call-in

Is the decision eligible for Call-in?

Yes

☒

No

☐

1.0	Purpose of Report/Summary of Main Issues
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1.1	This report provides an update on the Memorandum of Response published by the Department of Finance following the Public Accounts Committee (PAC) report on Planning in Northern Ireland.
2.0	Recommendation
2.1	The Committee is asked to: <ul style="list-style-type: none"> a) Note the contents of the report including the Memorandum of Response; and b) Note the update on the Regional Planning Improvement Programme.
3.0	Main Report
3.1	<p><u>Memorandum of Response</u></p> <p>In early 2022, two reviews of the NI Planning system were published:</p> <ul style="list-style-type: none"> • The Department for Infrastructure's review of the Implementation of the Planning Act (Northern Ireland) 2011; and • The Northern Ireland Audit Office's review of the NI Planning System.
3.2	In March 2022, the NI Assembly Public Accounts Committee (PAC) published its Report on Planning in NI. This report made 12 recommendations relating to the establishment of an independent Commission, streamlining the LDP process, transparency, engagement, the oversight role of the Department, quality of applications, reviewing past decisions, the financial sustainability of the planning system and importantly, the culture of those operating and engaging in the planning system.
3.3	At that time, the Department for Infrastructure (DfI) was required to provide a formal response to the PAC report within 8 weeks of its publication (i.e. by 19 May 2022), whilst the PAC recommendations also required an update be given to the successor Public Accounts Committee on the improvements made in six months' time (i.e by 24 September 2022).
3.4	As the Executive collapsed in early 2022, there was no successor PAC in place for the DfI to either provide their formal response to the report or to provide a 6-month update on actions taken.
3.5	Following the restoration of the Executive in January 2024, the Memorandum of Reply to the Report from the Public Accounts Committee was presented to the Northern Ireland Executive by the Minister of Finance on the 18 th April 2024 (Appendix 1). There is no further information available as to whether this will be considered by the PAC or any timescales around this.
3.6	The Memorandum sets out that the Department accepts all the recommendations in the PAC report. In responding to the specific PAC recommendations, the DfI place significant reliance on the formation of the Interim Regional Commission and the Planning Improvement Programme, setting out that these structures address the recommendations in relation to the need for a fundamental review to ascertain the long term strategic changes (<i>recommendation 1</i>) and the need to identify tangible improvements that can be achieved in the short term (<i>recommendation 2</i>). In the Department's view the Planning Improvement Programme also constitutes the radical action plan required by <i>recommendation 3</i> .
3.7	The Department also sets out that the recommendations relating to streamlining LDP processes (<i>recommendation 4</i>) and cultural change in the way local and central government interact around planning (<i>recommendation 12</i>) are largely addressed through the Interim Regional Commission and Planning Improvement Programme structures.
3.8	In relation to open and transparent decision making (<i>recommendation 5</i>) the Department sets out that they have produced and implemented a file management protocol. The Department has also undertaken a review of its past decisions (<i>recommendation 10</i>).

3.9	Whilst the Department accepts <i>recommendation 6</i> which sets out that they should ensure a suitable and proportionate means of engaging with the planning system including a deeper consideration of the appropriateness of limited third party rights of appeal, they then state that they were not persuaded in their review of the implementation of the Planning (NI) Act 2011 of the need to amend current provisions for appeals. They state that the matter will now be considered by the DfI Minister.
3.10	In answering the recommendation relating to the inconsistency of the operation of the planning system in relation to rural housing (<i>recommendation 7</i>), the Department set out that they will consider the next steps for regional planning policy on the issue following a recent Call for Evidence in January 2024.
3.11	In responding to the recommendation that requires the Department to urgently consider its oversight of the planning system, alongside cultural change (<i>recommendation 8</i>), the Department states that it will continue to work to ensure that they strike the right balance between respecting council's rights and responsibilities for carrying out their own statutory processes and decisions, whilst ensuring that regional planning objectives are achieved. The Department points out that delivering an efficient and effective planning system is a collective responsibility, but that they have shown leadership through the creation of the Planning Improvement Programme, which they believe will drive cultural change.
3.12	In responding to recommendations in relation to the quality of applications entering the system (<i>recommendation 9</i>) and financial sustainability (<i>recommendation 11</i>) the Department largely focuses on specific actions including the validation checklist, application fee increases and requesting additional resources for both DfI planning function and statutory consultees.
3.13	It should be noted that there are a number of recommendations in the PAC report that relate to local authorities working in collaboration with the Department, or relate to actions that local authorities can undertake. As set out in the Regional Planning Improvement Programme updates local authorities are working on those actions through Heads of Planning and SOLACE.
3.14	<u>Regional Planning Improvement</u> Since the publication of the reports in early 2022, this Committee has been provided with a number of updates on the Regional Planning Improvement Programme being progressed jointly between DfI and SOLACE with the most recent reports being considered in October 2023 and January 2024.
3.15	In October 2023, the Committee agreed to write to the Chair of the Interim Regional Commission. This letter was issued on the 20 November 2023 (Appendix 2) with a response received on the 30 November 2023 (Appendix 3).
3.16	Members should also note that the Infrastructure Minister met with members of the Interim Regional Commission on the 24 April 2024 and is due to meet with SOLACE on the 22 May 2024 to discuss the Planning Improvement work.
4.0	Appendices - Documents Attached
	<p>Appendix 1 – Department of Finance Memorandum on the Fourteenth Report from the Public Accounts Committee Mandate 2017-2022. 18 April 2024.</p> <p>Appendix 2 – Letter from John Walsh to the Chair of the Interim Planning Commission. 20 November 2023.</p> <p>Appendix 3 – Letter from the Chair of the Interim Planning Commission to John Walsh. 30 November 2023.</p>

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**Department of Finance
Memorandum on the Fourteenth
Report from the
Public Accounts Committee
Mandate 2017-2022**

Planning in Northern Ireland

**Presented to the Northern Ireland Assembly
by the Minister of Finance**

18 April 2024



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This publication is available at the Public Audit and Public Accounts Committee section of the Accountability and Financial Management part of the DoF website: <https://www.finance-ni.gov.uk/>.

Any enquiries regarding this publication should be sent to us at: planning@infrastructure-ni.gov.uk.

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Glossary of Abbreviations

DfI	Department for Infrastructure
iRPC	interim Regional Planning Commission
LDP	Local Development Plan
PAC	Public Accounts Committee
PAN	Planning Advice Note
RTPI	Royal Town Planning Institute
SPPS	Strategic Planning Policy Statement

Fourteenth Report

Department for Infrastructure

Planning in Northern Ireland

Introduction

The respective roles of the Department for Infrastructure (DfI) and local government in the Northern Ireland planning system are set out in legislation and reflect the intention of the Executive to create the two-tier planning system in 2015, transferring the majority of planning functions to the newly formed councils. Local councils have responsibility for a significant number of planning functions and are autonomous, locally accountable sovereign political authorities, out with the control of DfI. Accountability for the planning system, therefore, lies both with local and central government.

Whilst DfI has an important leadership role in the two-tier planning system, it does not have sole responsibility for addressing all the Committee's recommendations. A number of the recommendations reference local government and are relevant to the remit of council planning authorities. Therefore, in order to respect the correct accountability arrangements, DfI's response relates to the aspects of those recommendations which are for central government and does not respond on those aspects for which responsibility lies with the councils.

Notwithstanding this, DfI has led and continues to work with local government and other key stakeholders on a joint programme to improve the efficiency and effectiveness of the planning system. Within this context of collective ownership and responsibility, this Memorandum of Reply (MoR) identifies actions that have been taken by DfI in respect of those Committee recommendations for which it is either fully or partially responsible.

PAC Recommendation 1

The planning system in Northern Ireland is not working. The Committee recommends that a Commission is established to undertake a fundamental review to ascertain the long-term, strategic changes that are needed to make the system fit for purpose. This should be led by someone independent from the Department.

DfI accepts and has implemented this recommendation.

DfI has established an interim Regional Planning Commission (iRPC) which is independently chaired and comprises representatives from key stakeholder groups including the economy, environment and community sectors. A Terms of Reference outlining the objectives of the interim Commission is available on the DfI website and amongst its key objectives it aims to guide and promote continuous improvement by identifying, constructively responding to, and exploring new ways of tackling emerging issues in planning and sharing constructive and proactive comment across stakeholders on planning processes.

The interim Commission is currently providing advice and support to the wider Planning Improvement Programme using their expertise, skills and experience to constructively review, identify improvements and promote further accountability in the planning process.

The iRPC meets on a quarterly basis with the first meeting held on 24 February 2023. The Royal Town Planning Institute (RTPI) provides independent secretarial support to the interim Commission.

PAC Recommendation 2

The Committee has heard that there are a number of opportunities to make immediate improvements to the planning system. We recommend that a commission is established to identify tangible improvements that can be achieved in the short term. This must focus on problem solving, delivery and achieving outcomes within a fixed time frame.

DfI accepts and has implemented this recommendation.

As set out in the response to the first recommendation, an iRPC has been established and is providing advice and support to the wider Planning Improvement Programme. The Programme encompasses a suite of 40 actions with relevant targets and time

frames attributed to each action. It covers work streams including: Governance; Policy & Legislation; Local Development Plan (LDP); Development Management; Performance; Engagement and Financial Sustainability. Governance arrangements have been formalised to ensure accountability and appropriate oversight of the Programme.

PAC Recommendation 3

The Committee expects action to be taken to improve the planning system. In lieu of any accountability for performance within the system, the Department will provide the Committee with a radical action plan and provide the successor Committee with an update on the improvements made in six months' time.

DfI accepts this recommendation.

As reflected in the responses above, DfI has initiated and developed a Planning Improvement Programme which has been endorsed by local government. It encompasses a suite of 40 actions covering work streams including: Governance; Policy & Legislation; LDP; Development Management; Performance; Engagement and Financial Sustainability. Governance arrangements have been formalised to ensure accountability and appropriate oversight of the programme.

DfI will provide a copy of the Planning Improvement Programme to the Committee and are happy to update the Committee on progress made at any point.

PAC Recommendation 4

The Committee recommends that the Department considers ways to streamline the remaining LDP processes, and works with councils to learn lessons from those that have been through the independent examination process with a view to taking a more pragmatic approach to the remaining plans. The Department and councils need to work collaboratively to produce these important plans as soon as possible.

DfI accepts this recommendation.

The LDP process is a significant new process in the reformed planning system, which is being led by local government, and overseen by DfI in its central government strategic role. LDP preparation and production is advancing at different rates across the 11 council planning authorities and the timelines are set by each local council and agreed with DfI. As the system matures and becomes better established, best practice recommendations will become apparent. DfI however remains committed to capturing and sharing key learning as appropriate.

Streamlining LDP processes is a significant element of the Planning Improvement Programme with several actions being taken forward jointly by DfI and local government covering all areas of the existing process including legislation, guidance, procedures and the role of key stakeholders including the Planning Appeals Commission.

It is worth highlighting that to date four Councils have adopted their draft Plan Strategies and are progressing to Local Policies Plan stage. Progress on the remaining draft Plan Strategies for the other councils is at various stages of the process.

PAC Recommendation 5

The Committee recommends that all those involved in decision-making ensure that processes are open and transparent, particularly where a high degree of interpretation has been exercised. The Department and councils should consider how checks on good record keeping, to ensure transparency, could be carried out effectively.

DfI accepts this recommendation and has implemented it in respect of its role as a planning authority in the two-tier system.

DfI has produced and implemented a File Management Protocol to assist staff with consistent records management, ensuring that relevant documents are uploaded to the Planning Portal for external viewing. The protocol also ensures that records which are not suitable for publication on the Planning Portal are stored securely and retained by DfI for audit and accountability purposes.

PAC Recommendation 6

The Committee recommends that the Department should ensure that there is suitable and proportionate means of engaging with the planning system. This should include a deeper consideration of the appropriateness of limited third-party rights of appeal.

DfI accepts this recommendation.

The reformed planning system includes measures to significantly front-load third party and community engagement in the development management and forward planning processes. In the Review of the Implementation of the Planning (NI) Act 2011 report, DfI stated that it was not persuaded of the need to amend current provisions for appeals, and this was not brought forward as a recommendation. Any consideration of the introduction of limited third party rights of appeal into the planning system would require a change to primary legislation, with associated public consultation and Assembly scrutiny. This matter will be considered by the DfI Minister, who will decide the way forward on this policy matter.

PAC Recommendation 7

The operation of the planning system for rural housing is at best inconsistent and at worst fundamentally broken. The Committee believes that it is essential that policy in the area is agreed and implemented equally and consistently across Northern Ireland. The Department should ensure this is the case.

DfI accepts this recommendation in respect of its role and responsibility for regional planning policy.

In January 2024, DfI published a Call for Evidence on a potential focused review of the Strategic Planning Policy Statement for Northern Ireland (SPPS) in relation to Climate Change, including consideration of the future direction of policy for development in the countryside. The DfI Minister will consider the next steps for regional planning policy on this issue, following consideration of the responses from this Call for Evidence.

Under the two-tier planning system, it is the responsibility of council planning authorities to process and determine all planning applications for rural housing and to ensure that planning policy is considered and is a material factor when planning decisions are made; and to ensure that there is transparency around this process.

PAC Recommendation 8

The Committee recommends that the Department urgently considers how it exercises its oversight of the planning system. In the Committee's view, this must be accompanied with a cultural change. Intervention should be to support delivery and to make improvements. The current minimal approach is no longer sustainable.

DfI accepts this recommendation.

DfI will continue to work to ensure that oversight of the planning system strikes the right balance between respecting council's rights and responsibilities for carrying out their own statutory processes and decisions, whilst ensuring that regional planning objectives are achieved. It is also important to acknowledge that the objective of achieving an efficient and effective planning system which delivers for the economy, communities and the environment is a collective responsibility for all those involved in the planning process, and all stakeholders must play their part.

DfI has demonstrated leadership through the creation of the joint Planning Improvement Programme endorsed by local government to support delivery and make improvements across the planning system. In conjunction with associated governance arrangements including the Planning Improvement Project Board it is considered that the Planning Improvement Programme will help drive cultural change.

PAC Recommendation 9

The Committee recommends that the Department and local government should implement immediate changes to improve the quality of applications entering the system. Whilst this may require legislative change, we do not believe that this should be an excuse for delay.

DfI accepts this recommendation.

Following a public consultation in November 2022, legislation has been drafted to enable the production of statutory validation checklists for planning applications submitted to council planning authorities. DfI is engaging with key stakeholders including the Planning Appeals Commission and Department of Justice (in relation to providing for a dispute mechanism), local government and statutory consultees, to ensure that the practical out-workings of the amending legislation and supporting guidance achieve the objective of improving the quality of applications entering the system. The legislation will need to be approved by the DfI Minister and completed in line with Assembly procedures. DfI has also encouraged local government to proceed to develop their own local validation checklists in advance of the legislation, and to work with developers and agents to prepare them for the changes. In terms of applications processed by DfI, the Regional Planning Casework Team carries out direct engagement with applicants from an early stage to ensure the submission of accurate and appropriate documents/drawings and decrease the likelihood of an invalid application being received.

PAC Recommendation 10

The Committee recommends that planning authorities regularly review past decisions to understand their real-world outcomes, impact on communities and the quality of the completed development.

DfI accepts and has implemented this recommendation in respect of its role and responsibilities.

DfI has undertaken a review of its own past decisions and is using this to inform a methodology for future recording and reporting on real-world outcomes.

PAC Recommendation 11

The planning system must be financially sustainable and this requires an appropriate, long-term funding model. The Committee recommends that all those involved in delivering planning work together to achieve this. In the short term the Department should take the lead on bringing forward legislation on planning fees as a matter of urgency.

DfI accepts this recommendation in respect of its role and responsibilities.

DfI recognises that the long-term financial sustainability of the regional planning system is of critical importance, particularly in these difficult financial times. This issue is, however, influenced by a multitude of factors, many of which are outside the DfI's direct remit and control, such as the wider management and prioritisation of finances within individual councils and other departments.

DfI recognises that in order to achieve the improvement to the planning system, the whole system and key parties to delivering the process i.e. DfI, council planning authorities, statutory consultees and the Planning Appeals Commission must be properly funded and resourced in terms of capacity and capability. For its part, DfI has requested additional resources for the DfI planning function, including Roads and Rivers statutory consultees, through the 2024/25 budget process. It is recognised however that any additional funding will be subject to the constraints on the budget available and the consideration of competing priorities and funding decisions are ultimately a matter for Ministers and the Executive.

DfI also recognises that any assessment of financial and budgetary requirements should be set against the most efficient systems and processes available, and any work towards streamlining existing processes and systems should inform the financial sustainability of the planning system.

In terms of planning fees, DfI legislated in April 2023 to provide an inflationary uplift of approximately 12.3 per cent across all planning application categories to assist councils and DfI in covering the cost of processing planning applications. DfI also intends to introduce a further inflationary uplift to planning fees in 2024. The DfI Minister will decide the approach to future uplifts on an ongoing basis.

PAC Recommendation 12

There is a fundamental need for a cultural change in the way local and central government interact around planning. Whilst cultural change will take time, this should be reflected immediately in a more inclusive planning forum which includes representation from developers and communities.

DfI accepts and has implemented this recommendation.

As reflected in the response to recommendation 1 above, an inclusive iRPC which is independently chaired and comprises representatives from key stakeholder groups including the economy, environment and community sectors has been established and the work which central and local government are taking forward together is set out in this MoR.



Your reference

Our reference JW/as

Date 20 November 2023

Ms Rosemary Thomas
Chair of the Interim Regional Planning Commission
c/o Julie Sullivan: julie.sullivan@rtpi.org.uk

Dear Rosemary

Regional Planning Improvement Programme and the Interim Regional Commission

I am writing to you in your capacity as the Chair of the Interim Regional Commission as I am aware that there is a workshop being planned for the Commission members in November and I thought it would be an opportune time to express both our commitment to and concerns around the approach taken to date.

Belfast City Council has made extensive representations to the Department for Infrastructure's call for evidence on the implementation of the Planning Act, as well as to the Northern Ireland Audit Office in producing their report. We were also able to give evidence to the Public Accounts Committee in their consideration of Planning in Northern Ireland. Our interest and commitment to identify issues and improve the regional planning system is absolute.

For Belfast as the capital and economic regional driver of Northern Ireland, it is essential that the Council shares its observations and concerns regarding the operation of the planning system in Northern Ireland. Planning has a vital role to play in the economic prosperity of the city, social cohesion and promoting the environment. It is also key to delivery of the *Belfast Agenda*, the City's Community Plan.

The Regional Planning Improvement Programme that has been progressed over the last 18 months has identified a number of issues that are in the process of being addressed but we are very concerned that the actions identified, the culture in which the actions are being pursued and the governance around the programme will not result in the fundamental change identified and required by the Public Accounts Committee and ourselves.

As the Interim Planning Commission will meet to consider its role, remit and work programme in November, I would like to extend the offer of meeting with yourself or the wider Commission. This would enable constructive discussion on Belfast City Council's long standing and well documented concerns around the regional planning improvement programme in the hope of achieving better outcomes for the regional improvement work to much better serve the needs of our citizens, businesses and environment.

I look forward to receiving your response.

Yours sincerely


John Walsh LLB LLM
Chief Executive

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Chief Executive's Office			
Date: 4/10/23			
Noted by CX: Y/N			
Ref: JW 3-11			
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Copy sent		Original sent	
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38, Ravensdene Crescent,
Belfast,
BT6 0DB

30 November 2023

John Walsh, LLB, LLM,
Chief Executive,
Belfast City Council,
City Hall,
Belfast, BT1 5GS

Your ref: JW/as

Dear John,

**REGIONAL PLANNING IMPROVEMENT PROGRAMME AND INTERIM
REGIONAL PLANNING COMMISSION**

Thank you for your letter of 20 November expressing your Council's commitment to improving the regional planning system and outlining how you have been inputting to the process so far.

I note your view that the Regional Planning Improvement Programme will not result in the fundamental change needed, and your offer of a meeting. Your Council's Head of Planning, Kate Bentley, has been making an insightful and positive contribution to the Commission's deliberations to date. Her experience and current role as leader of the Heads of Planning Group is immensely useful as implementation of key elements of the Planning Improvement Programme proceeds. Introducing change is invariably challenging, however much those changes are needed; the most challenging change to secure is that of culture change.

It is my understanding that the Department's Deputy Secretary, Julie Thompson, has been liaising closely with local authorities and their Chief Executives through the Planning Improvement Programme Board and via Alison McCullagh; you will be aware that Alison represents SOLACE on the Commission. As the Commission's next meeting will be in the New Year, it would be helpful if you could raise any continuing concerns with Alison and SOLACE, as well as with Kate, so that they can feed them into the Commission for our consideration and any actions arising, when we next meet.

As the local authority with the largest population and greatest number of planning applications, your authority's views will be of particular interest to the Commission so I will bear in mind your offer to meet.

Yours sincerely,



Rosemary Thomas

Interim Chair of the Regional Planning Commission

By virtue of paragraph(s) 5 of Part 1 of Schedule 6
of the Local Government Act (Northern Ireland) 2014.

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