

CABINET

4 December 2013

SOLENT DISTURBANCE AND MITIGATION PROJECT INTERIM PLANNING
FRAMEWORK

REPORT OF ASSISTANT DIRECTOR (BUILT ENVIRONMENT)

Contact Officer: Simon Finch Assistant Director Built Environment Tel No: 01962
848271

RECENT REFERENCES:

None

EXECUTIVE SUMMARY:

This report sets out the current position regarding Winchester City Council's responsibilities under the Habitat Regulations when exercising its development management functions and, in particular, the decisions it makes relating to planning applications for residential development in the southern part of the District.

Planning authorities have a duty under the Habitats Directive to assess the impact of development on sites of international importance for nature conservation. Where there is likely to be an adverse impact the mitigation of that impact will need to be achieved for that development to go ahead. Along the Solent there are a number of designated sites including the Solent and Southampton Water, Portsmouth Harbour and Chichester & Langstone Harbour Special Protection Areas all of which are potentially affected by residential development across and adjoining the Partnership for Urban South Hampshire area.

Planned additional housing development along the Solent, which includes part of Winchester's District's area within 5.6km of the boundary of the designated sites, is likely to have a significant impact on coastal birds which are protected under the Habitat Regulations by reason of increased recreational activity on the coastline.

To comply with the Regulations in terms of mitigating the effect of new residential development, Winchester City Council officers have been working with other planning authorities in the Partnership for Urban South Hampshire (PUSH), Solent

Forum (Solent Disturbance & Mitigation Project) and Natural England (NE) to agree a strategic mitigation strategy which would enable development to proceed. To this end a Solent SPA Interim Planning Framework has been produced by Solent Forum which provides a mechanism for mitigating the effects of development over the next 2-3 years.

The proposed way forward is set out in this report and it is recommended that the Council agrees to seek financial contributions for all residential development schemes within 5.6km of the boundary of designated sites (this is on the assumption that the other relevant local authorities agree to the Interim Planning Framework approach). These contributions will be used in conjunction with those secured by other PUSH authorities to fund mitigation set out in the Interim Planning Framework for the increased recreational pressure on the Solent area in the form of coastal management measures unless developments can demonstrate that their impacts on the coastline can be mitigated in other ways. Details of the management measures to be funded by contributions are included in the report.

Officers will continue to work with other local authorities and NE relating to the production of a longer term strategy (in such a form as may be required) and this will include a review in 2-3 years of the efficacy of the management measures put in place by the Interim Planning Framework. Consideration will be given at this point as to whether additional mitigation measures will be needed and how they might be funded.

RECOMMENDATIONS:

- 1 That Winchester City Council agrees to seek financial contributions in line with the Interim Planning Framework (commencement date to be delegated to the Head of Strategic Planning) for all new residential development proposals within the 5.6km zone to be used for the mitigation of increased recreational activity along the Solent coastline (initially £172 per dwelling) in order to enable the Council to meet its obligations under the Habitat Regulations unless it can be demonstrated that a development can provide mitigation by other means.
- 2 That the City Council continues to work with other PUSH authorities and Natural England to agree and implement formal arrangements to collect and spend contributions received from residential developments in the 5.6km zone in order to implement the Interim Planning Framework.
- 3 That the City Council should work with other local authorities and Natural England to develop a long-term joint strategic avoidance and mitigation strategy as appropriate. Details of this, which may involve the use of Community Infrastructure Levy (CIL) funds, will be reported to Cabinet once developed. If other local authorities decide not to support the Interim Planning Framework Winchester will need to review its position.

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DETAIL:

1 Introduction

- 1.1 Winchester City Council has a responsibility under [the Conservation of Habitats and Species Regulations 2010 as amended](#) (Habitat Regulations) to not permit a plan or project which will have an adverse affect on protected habitats or species. Significant areas of the Solent are protected under these Regulations for their habitats and the over-wintering bird species that these support.
- 1.2 Natural England (NE), the government's advisor on implementing the Habitat Regulations, has advised planning authorities in and adjacent to the PUSH area that housing development within 5.6km of the Solent's protected sites is likely to have a cumulative significant effect on protected coastal birds. Therefore development can only proceed if suitable mitigation is provided. Natural England are taking a pragmatic approach and are currently not objecting to most residential development schemes in the 5.6km zone, on the basis that the planning authorities are actively working towards agreeing and implementing a strategic mitigation strategy.
- 1.3 However, if a mitigation strategy is not implemented by the local authorities in a timely manner, all development would be required to provide its own mitigation package and demonstrate compliance with the Habitat Regulations. In practical terms this would be very difficult, particularly for small schemes. This has the potential to affect development within the Southern Parishes of the Winchester District (see Appendix 1 for a map of the 5.6km Zone in Winchester District) and could seriously hamper, or delay development. NE has advised the relevant local authorities that failure to adopt a mitigation strategy by April/May 2014 is likely to result in them raising objections to future residential schemes.
- 1.4 The 5.6km zone crosses 11 local authority areas and two National Parks. The mitigation needed to ensure that protected species are not adversely affected by increased recreation pressure is not something that can be provided by one local authority alone. The Solent Forum¹ therefore set up the Solent

¹ The Solent Forum is a coastal partnership established in 1992; membership includes Local Authorities, Harbour Authorities and other organisations such as NGOs, marine businesses and

Disturbance and Mitigation Project (SDMP) to develop a strategic mitigation strategy.

- 1.5 This work has now been completed and the recommended Interim Planning Framework is provided in Appendix 2 and discussed further below.
- 2 The issue: recreation pressure affecting protected sites/species
 - 2.1 It has been demonstrated that recreational activity on designated sites can have an adverse affect on bird populations². An additional 55,600 dwellings are forecast to be built in South Hampshire between 2011 and 2026³. This level of housing will increase the number of people living in close proximity to the coast which has the potential to increase the number of people visiting the coast.
 - 2.2 As more people visit the coast, coastal birds which overwinter along the Solent are more likely to be disturbed. This disturbance can displace these protected species from their feeding grounds, and reduce their ability to feed to the extent that they are not sufficiently strong to successfully complete the return journey to their breeding grounds in the spring.
 - 2.3 Although Winchester District has only a small area within the Solent tidal range (Upper Hamble Estuary), the Solent Disturbance and Mitigation Project (see below) has demonstrated that people will travel a number of kilometres to use the coast for recreation such as dog walking (the visitor survey undertaken as part of the study showed half of visitors travelling by car came from over 4km away⁴). This means that development some distance from the coastline will be likely to have an impact and NE's position is that residential schemes within 5.6km of the boundary of designated sites will need to contribute to the proposed mitigation in order to comply with the requirements of the Habitat Regulations.
- 3 The Study: The Solent Disturbance and Mitigation Project
 - 3.1 Given concerns about the cumulative impact of housing development near designated nature conservation sites in the Solent area a study was undertaken by a number of ecological consultancies including Footprint Ecology and Bournemouth University to look at the issues around new housing development, increased recreational activity along the coast and the impact on bird populations. This work was overseen by a project group of officers from the local authorities and Conservation Organisations (Natural England, the RSPB and the Wildlife Trust). The study demonstrated that it was likely that additional development along the Solent would have a significant impact on bird populations. The final stage of the project identified how any significant effects could be mitigated.

statutory regulators. The Forum aims to facilitate more integrated planning and management of the Solent and assist the agencies and authorities in carrying out their functions.

² [Solent Disturbance and Mitigation Project Phase I Report \(2009\) Footprint Ecology et al.](#)

³ [PUSH Economic Development Strategy Preferred Growth Scenario 2012](#)

⁴ [Solent Disturbance and Mitigation Project Phase II Report, \(2010\) Footprint Ecology](#)

3.2 The full study can be viewed at:
http://www.solentforum.org/forum/sub_groups/Natural_Environment_Group/Disturbance_and_Mitigation_Project/

4 Natural England Advice under the Habitat Regulations

4.1 Some concerns were raised about the evidence produced by the study so NE had the report peer reviewed independently and concluded that it represents the best evidence available regarding the affect of new housing schemes on designated sites along the Solent and suggests that residential development near the coast will be likely to impact bird populations. As the government's advisor under the Habitat Regulations, they have subsequently advised Local Planning Authorities (LPAs⁵) including the City Council that new housing development would require mitigation to avoid impacts to the protected sites and species along the Solent. NE recognised that it would take some time to put in place a comprehensive approach and proposed the following short and interim measures:

- a) Seeking contributions from development to provide a source of funding
- b) Initiating a series of mitigation projects in the short term
- c) Commencing work on a long term strategy
- d) Defining a zone within which contributions would be sought

4.2 The Hampshire and Isle of Wight Chief Planning Officers Group (HIPOG) took the view that planning authorities could not seek contributions through planning obligations for individual applications *before* a strategy and mechanism had been put in place showing how funds received would be used to mitigate the effects of development (a above). However, an Interim Planning Framework should be introduced ahead of developing a long-term strategy (b and c above).

5 The Proposed Solution: Interim Planning Framework

5.1 Since the completion of the project, officers have been working with other local authorities and Natural England on a suitable Interim Planning Framework which can be implemented across the LPA areas affected over the next 2-3 years. Based on evidence gathered through the Study and other mitigation schemes in place (e.g. Dorset Heaths), a 5.6km zone was agreed by the Solent Disturbance and Mitigation Project Group including Natural England. This zone has also been accepted by the local authorities in PUSH (see 4.1 d above).

5.2 The key elements of this Interim Planning Framework mitigation package include the provision of:

⁵ [Letter to PUSH Planning Officers Group in May 2013](#)

- a) A project officer to develop both short term measures and the longer term strategy;
 - b) A team of rangers to minimise the scale of disturbance on the shoreline; and
 - c) A monitoring scheme.
- 5.3 In terms of agreeing a logical and robust way of calculating the level of contributions sought for housing developments across the PUSH area the total cost of implementing these management schemes was divided by the number of dwellings forecast to be built in the 5.6km zone over the remaining Local Plan periods (which for Winchester is to 2031) based on information supplied by the LPAs. In addition, as advised by NE, an 'in perpetuity' cost to cover annual mitigation costs was added.
- 5.4 For Winchester, officers estimated that on average 62 dwellings per annum over the next 18 years (remaining plan period) would be developed within the 5.6km zone. This figure excludes anything already permitted and the Strategic Allocation at North Whiteley. The framework is focused on enabling the delivery of smaller development schemes which together would have a cumulative impact on the coastline. Larger schemes such as North Whiteley should be able to provide a significant portion of the mitigation on-site through the provision of alternative natural green space as an alternative recreation resource. However, as this will never completely deter new residents from visiting the coast, it is likely that they will be expected to pay a contribution towards the project. Officers are working with the consultants for North Whiteley to address these issues.
- 5.5 In total the cost of the Interim Planning Framework is estimated at **£171.44 per dwelling** (further detail is given in Appendix 2). It is considered by officers that this amount is a relatively modest figure and is unlikely to affect the viability of development. It is envisaged that financial contributions for each development in the zone can be secured by planning obligations (s106 agreements or unilateral undertakings).
- 5.6 Policy CP16 on Biodiversity in the Local Plan Part 1 (2013) provides the mechanism to secure the necessary mitigation by setting out how Winchester City Council will comply with the Habitat Regulations. It includes clear support for the SDMP and seeks to ensure that appropriate strategic avoidance and/or mitigation measures are secured as necessary through the planning process.
- 5.7 Officers' view is that the type of mitigation proposed in the interim is recreational management which would not be classed as infrastructure. It is therefore unlikely that funds from the City Council's Community Infrastructure Levy, due to be introduced in April 2014, would need to be used and the associated 'pooling contributions' issue relating to planning obligations which comes into play, either when a council introduces CIL or April 2015 (whichever occurs first), will not apply. However, as part of the process of agreeing the details for implementing the Interim Planning Framework, further

advice on this can be sought by the LPAs if necessary. In the event that a longer-term strategy evolves which involves additional mitigation measures in the form of infrastructure, CIL funds may be required as such measures are likely to constitute 'infrastructure' and could not be funded by using pooled contributions from individual planning permissions.

6 Next Steps

- 6.1 In summary it is recommended that Winchester City Council agrees to seek financial contributions for residential developments in the 5.6km zone in order to support the Interim Planning Framework. This provides the mechanism which will enable residential developments in the District to comply with the Habitat Regulations without the need to undertake their own assessments and find appropriate mitigation.⁶
- 6.2 Consequently the City Council will be able secure financial contributions for mitigation from developers and can therefore continue to grant planning permission in relation to those sites within the District which lie inside the 5.6km zone. The date for introducing this policy should be delegated to officers to agree in consultation with other local authorities and NE but the date anticipated for its introduction is April or May 2014.
- 6.3 Officers will continue to work with other local authorities and NE on the details of the implementation of the Interim Planning Framework and the development of a long-term strategy as required.
- 6.4 Officers envisage that the following specific steps will need to be taken to secure implementation of a comprehensive strategic mitigation scheme for residential development in the Solent area:
 - a) The preparation of a joint Interim Planning Framework and long term mitigation strategy.
 - b) The setting up of a HIPOG sub-group to develop the details of the Interim Planning Framework and long term mitigation strategy.
 - c) The Interim Planning Framework to be put in place and operative as soon as practicable with a target date of May 2014.
 - d) The scale of the interim approach will need to be phased to reflect the availability of funding.
 - e) The implementation of the long term mitigation strategy as required.
 - f) Engagement with the Solent Local Economic Partnership (LEP) to explore additional funding mechanisms.

⁶ If significant effects on other protected sites/species are identified, then the developer will still need to address these issues.

- 6.5 It is proposed that the Interim Planning Framework is introduced by the end of April or May 2014.
- 6.6 Funding has been identified for the initial Project Officer post for 1 year. Portsmouth City Council has agreed to host this short-term post. A job description has been agreed and the post can be advertised in the new year. The role would be to establish a Solent wide avoidance and mitigation framework and implement the Interim Planning Framework. It is considered that the longer-term running of the project would need a different skill set, and Hampshire County Council may host the long-term Delivery Officer post once the initial project is up and running.
- 6.7 The funding for the ranger posts will come from the developer contributions collected by local authorities in PUSH and adjoining areas and potentially from other sources such as one off contributions from local authorities. Officers also intend to approach the Solent LEP to see if they would be prepared to consider providing financial support. Funding from the contributions will be pooled and most likely held and distributed by Hampshire County Council. The County performs a similar role for the Thames Basin Heaths scheme.
- 6.8 The Interim Planning Framework would need to be agreed by each authority. If all Local Authorities involved do not sign up to implementing the Interim Planning Framework, then it would not deliver the necessary mitigation to meet the requirements of the Habitat Regulations. If this is the case, Winchester City Council would need to review its position.
- 6.9 The Interim Planning Framework will be steered by senior officers through a HIPOG subgroup working with Chichester District Council and Natural England. The aim of the Interim Planning Framework will be to enable development to proceed in compliance with the Habitat Regulations and allow people to continue to use the Solent coast responsibly. There may be wider benefits from the long-term mitigation strategy for Winchester District. The type of project for which funding will be sought through this project could include schemes already identified in the PUSH and Winchester City Council Green Infrastructure (GI) Strategies. A strategic approach for this project could help the delivery of these GI projects.

OTHER CONSIDERATIONS:

7 SUSTAINABLE COMMUNITY STRATEGY AND CHANGE PLANS (RELEVANCE TO):

- 7.1 The project supports the Active Communities and High Quality Environment objectives of the Sustainable Community Strategy 2013.

8 RESOURCE IMPLICATIONS:

- 8.1 This first step is to agree and implement the Interim Planning Framework. Officers will need to work with the Delivery Officer to agree a long term

mitigation framework as appropriate. This will entail reviewing the efficacy of the Interim Planning Framework after 2-3 years to determine what additional mitigation measures may be required in the longer term. This may involve officer time in the Strategic Planning Team and the Landscape Team to identify mitigation projects and can be covered within existing resources or other planned work.

- 8.2 It is likely that further funding will be sought to support the longer term project officer. This should be funded through the developer contributions; however these may take time to accumulate. Therefore the Council may be asked for a start-up contribution (£5000 per authority has been suggested in the past) which could come from PUSH or would need to be subject of modest budget growth (this contribution is likely to be required for 2014/15).

9 RISK MANAGEMENT ISSUES

- 9.1 If an Interim Planning Framework is not agreed and funded by contributions secured from individual development schemes, developers will be required to assess the impact of their proposals both individually and cumulatively with other development in the 5.6 km zone under the Habitat Regulations. The applicant would then have to demonstrate how they would avoid or mitigate significant effects resulting from their housing proposals which may require them to identify projects along the Solent as mitigation. If they were unable to do this the Council would have little option but to refuse planning permission and NE has indicated that they would be likely to raise objections to developments where mitigation measures have not been secured. This is likely to be very difficult for developers, especially on smaller sites and could prove to be more expensive and time consuming for both the developer and the local planning authority than agreeing a strategic mitigation scheme. Failure to agree and implement an Interim Planning Framework could seriously threaten the delivery of housing in the Southern Parishes of the District, which could in turn affect the Council's ability to demonstrate that it has an adequate supply of housing land.
- 9.2 The Interim Planning Framework would need to be agreed by each authority. If all Local Authorities involved do not sign up to implementing the Interim Planning Framework, then it would not deliver the necessary mitigation to meet the requirements of the Habitat Regulations. If this is the case, Winchester City Council would need to review its position.

BACKGROUND DOCUMENTS:

[Non-technical Summary of Solent Disturbance and Mitigation Project](#)

[Natural England Letter to PUSH Planning Officers Group 2013](#)

Solent Forum [Cover Letter](#) and [Briefing Note](#) to Solent Local Planning Authorities Aug 2013

[Solent Disturbance and Mitigation Full Project Reports \(Phases 1 and 2\)](#)

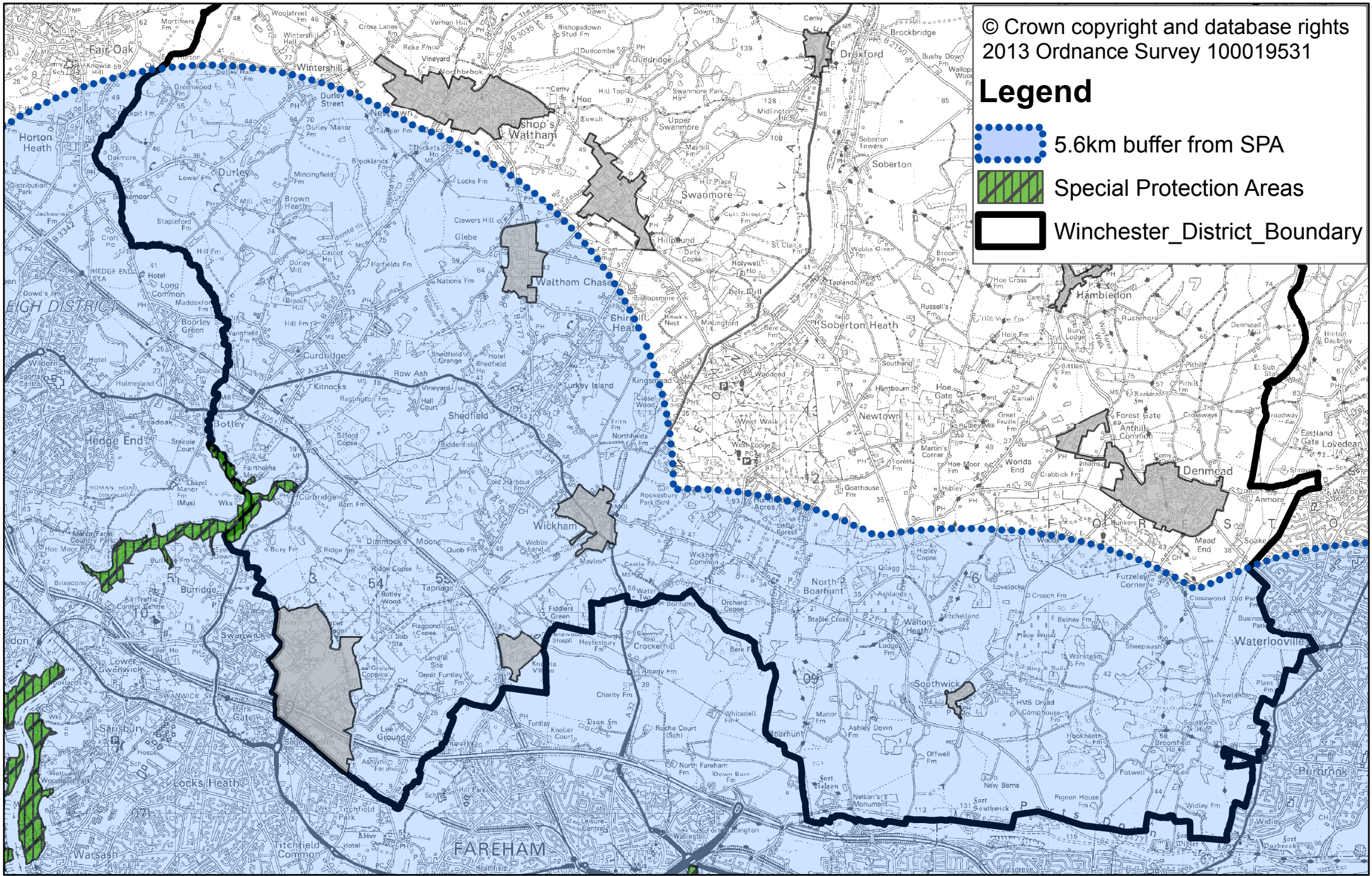
[PUSH Economic Development Strategy Preferred Growth Scenario 2012](#)

APPENDICES:

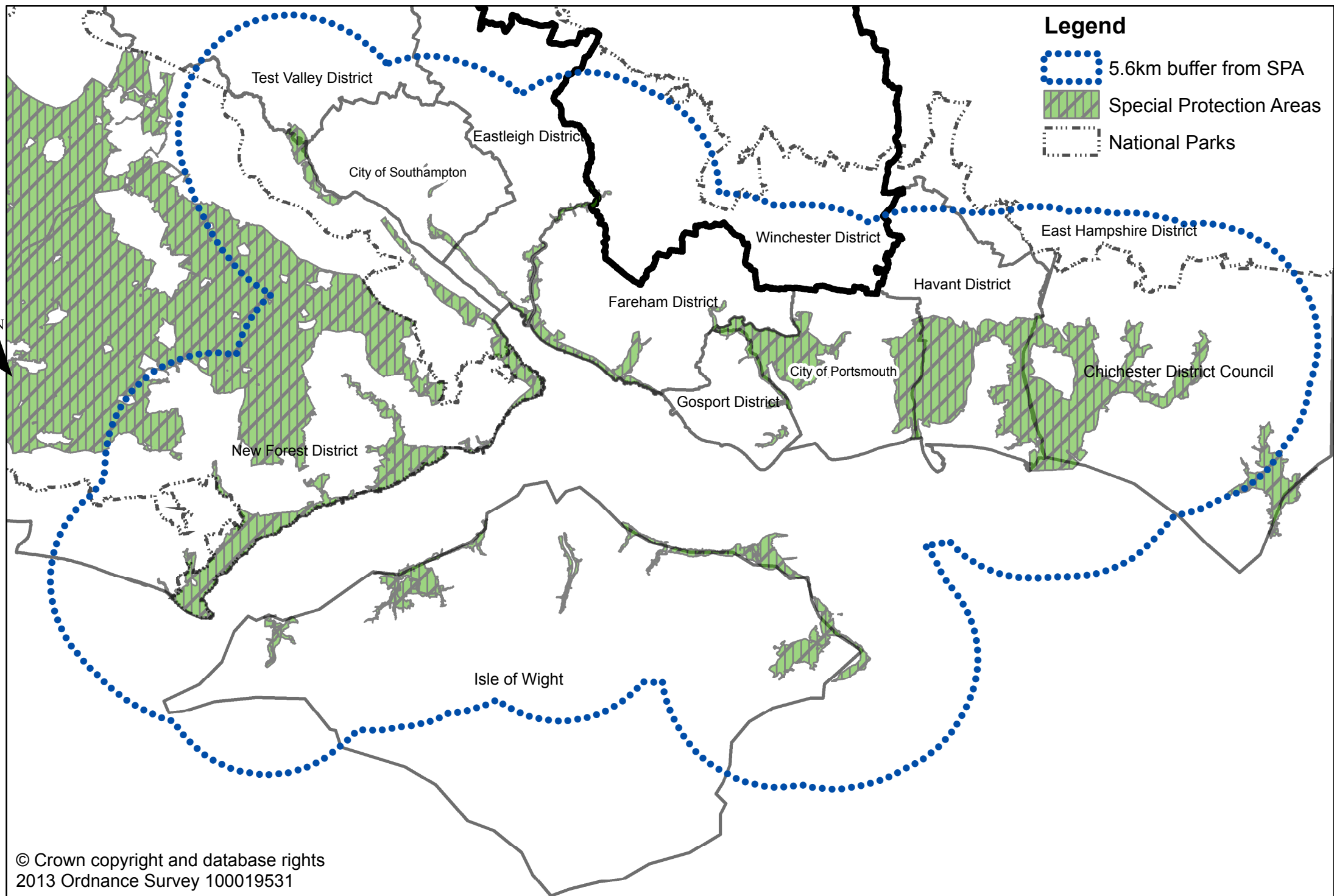
Appendix 1: Map of the 5.6km Zone in Winchester District and map of wider area.

Appendix 2: Calculation of potential contributions for Interim Planning Framework.

Solent Disturbance and Mitigation Project 5.6km boundary from Special Protection Areas



Solent Disturbance and Mitigation Project 5.6km boundary from Special Protection Areas



Solent SPA Interim Planning Framework

(5th November 2013)

The methodology below sets out what level of contribution could potentially be collected from new development at the Solent to fund the 'quick win' avoidance and mitigation measures set out in the Solent Disturbance and Mitigation Project (SDMP) Phase 3 work¹. It is intended that these measures will allow development to be lawfully permitted until a more comprehensive mitigation plan can be developed and agreed in the future. The calculation methodology is thus kept purposefully simple, yet is also robust.

Natural England's advice (31st May 2013) stated that the quick win measures consist of the wardens and dogs project. The advice states that "*these quick win measures could be made sufficient to address at least the potential increase in visitor numbers on the scale anticipated in this timescale*". As such, it is only these measures which have been budgeted for in the interim framework methodology and no more.

The amount of housing which is being predicted is based on local plan housing targets. However these have been adjusted to take account of the level of housing which has already been completed and permitted as mitigation funds cannot be obtained from these developments from a cut off date of 31st March 2013. This gives as accurate a prediction as is possible of the likely housing coming forward which will be able to fund the mitigation measures.

Natural England's advice and the phase 3 work itself states that the mitigation measures proposed are sufficient, but only "*to avoid the likelihood of a significant effect arising from the scale of housing proposed in current development plans*". As such, once the end of the plan period is reached, the measures will need to be self-funding in order to maintain the mitigation measures and avoid the impact from the development occurring from that point onwards. This requires funding from development each year to be placed into an investment account and managed accordingly. This will then generate annual interest, sufficient to be able to fund the annual costs of the mitigation scheme by the end of the plan period. As different local authorities have different dates for the end of their current plan period, a mid-point end date of 31 March 2028 has been selected. A cash flow analysis setting out how the mitigation measures can be self-sustaining is set out on page 3.

The methodology for calculating the likely housing provision within 5.6km of the Solent SPAs, the annual costs of the mitigation measures and the amount of funding required for the in-perpetuity allowance is set out on the following two pages.

In total, this results in a cost of **£171.94 per dwelling**

¹ [http://www.solentforum.org/forum/sub_groups/Natural Environment Group/Disturbance and Mitigation Project/](http://www.solentforum.org/forum/sub_groups/Natural%20Environment%20Group/Disturbance%20and%20Mitigation%20Project/)

Methodology

This is based on predicting the likely housing delivery per year and the cost of funding the delivery officer, the warden team and an operating budget for a year and ensuring that mitigation can be self-funding from 1st April 2028.

Housing delivery

A potential figure for annual housing delivery is set out below:

Chichester (part)	340	Notes <ul style="list-style-type: none"> ▪ The housing delivery projections are based on each authority's local plan. ▪ Housing projections are based on the following methodology: $\frac{A - (B+C)}{D}$ <ul style="list-style-type: none"> A - total housing target in the local plan (draft local plan if this is most up to date figure) B - total housing completions from the start of the plan period to 31/3/13 C - outstanding residential planning permissions on 31/3/13 D - number of years left in the plan period at 31/3/13 ▪ The total delivery for New Forest District, New Forest National Park Authority, Test Valley, East Hampshire, Winchester, Eastleigh and Chichester are based on the likely amount of development which will take place inside the 5.6km buffer. ▪ Housing delivery at Welborne has not been included in the framework as no delivery is anticipated within the lifetime of the interim framework and the impact due to recreation from the development will largely be met on-site.
Eastleigh (part)	274	
Fareham (ex Welborne)	26	
Gosport	100	
Havant	262	
New Forest District (part)	98	
New Forest NPA (part)	3	
Portsmouth	422	
Southampton	485	
Test Valley (part)	80	
Winchester (part)	62	
East Hampshire (part)	15	
TOTAL:	2,167	

Costs of the mitigation

Potential annual mitigation costs are set out below:

Ranger 1	£20,022	Notes <ul style="list-style-type: none"> ▪ Ranger salaries based on PCC band 8, which our rangers are on. Costs include an allowance for uniform, PPE, equipment, vehicle rent, maintenance and fuel ▪ One ranger salary is based on a full year contract. The remaining three ranger salaries are divided by two to reflect the fact that the rangers would be on six month contracts (as SPA birds are only here in the winter). ▪ Operating budget includes printing, signage and web-design for the dog project. ▪ The Project Implementation Officer cost is based on the total annual costs of hosting the officer from HCC's submission. ▪ Monitoring based on initial estimate from Footprint Ecology, including 2 days monitoring of bird and visitor behaviour at 20 locations. This would come to c£25,000 but monitoring would only be necessary once every three years.
Ranger 2	£20,022	
Ranger 3	£20,022	
Ranger 4	£40,058	
Project implementation officer	£41,456	
Operating budget	£7,500	
Monitoring	£8,333	
Sub-total of mitigation costs:	£157,413	
In perpetuity allowance:	£215,184	Set at 136.7% of annual mitigation costs, which is the level that allows for sufficient interest to be gained by the end of the plan period to cover the annual mitigation costs. See next page for full cash-flow.
TOTAL ANNUAL COSTS:	£372,597	Includes annual mitigation and in-perpetuity allowance.
Cost per new dwelling	£171.94	Total annual costs divided by total housing delivery.

Costs of providing the mitigation in-perpetuity

A potential calculation for ensuring that the mitigation measures can be secured in-perpetuity is set out below based on a cash flow analysis.

This shows the input from development in each year, the rolled over totals from previous years and the interest that can be gained on the investment. By year 2027/28 sufficient annual interest can be gained on the investment (figure which is highlighted) that the mitigation scheme can be self-funding.

Row no.	Cost	Formula
1	Input from previous year (a)	Carried over from (e) of previous yr
2	Interest rate (b)	Assumed rate
3	Interest gained that year (c)	$a \times b$
4	Input from development (d)	Carried over from (†)
5	Sub-total	$a + c + d$

Row no.	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
1	-	£215,183.57	£438,974.48	£671,717.04	£913,769.29	£1,165,503.63	£1,427,307.35	£1,699,583.21	£1,982,750.11	£2,277,243.69	£2,583,517.00	£2,902,041.26	£3,233,306.48	£3,577,822.31	£3,936,118.77
2	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%	4.00%
3	£0.00	£8,607.34	£17,558.98	£26,868.68	£36,550.77	£46,620.15	£57,092.29	£67,983.33	£79,310.00	£91,089.75	£103,340.68	£116,081.65	£129,332.26	£143,112.89	£157,444.75
4	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£215,183.57	£0.00
5	£215,183.57	£438,974.48	£671,717.04	£913,769.29	£1,165,503.63	£1,427,307.35	£1,699,583.21	£1,982,750.11	£2,277,243.69	£2,583,517.00	£2,902,041.26	£3,233,306.48	£3,577,822.31	£3,936,118.77	£4,093,563.52