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# Report of Director of Adults and Health and Director of City Development

**Report to Executive Board** 

Date: 16<sup>th</sup> December 2020

Subject: Disposal of land located on Windlesford Green, off Holmsley Lane, Rothwell for Extra Care Housing delivery and final terms of Development

Agreement.

Are specific electoral wards affected?  If yes, name(s) of ward(s): Rothwell	⊠ Yes	☐ No
in yes, name(s) or ward(s). Notificen		
Has consultation been carried out?	Yes	☐ No
Are there implications for equality and diversity and cohesion and integration?	☐ Yes	⊠ No
Will the decision be open for call-in?	⊠ Yes	□No
Does the report contain confidential or exempt information?  If relevant, access to information procedure rule number: 10.4(3)  Appendix number: 3	⊠ Yes	□No

## **Summary**

#### 1. Main issues

- Further to the approval of the Council House Growth Programme Delivery of Extra Care Housing report at 19th December 2018 Executive Board, this report sets out proposals to sell land at Windlesford Green, off Holmsley Lane in Rothwell to the approved consortium of Morgan Sindall Later Living (formerly known as Ashley House Ltd/Morgan Ashley LLP) and Home Group to facilitate the development of new Extra Care Housing.
- The project will contribute to the Council's strategic objective of delivering the Leeds Vision for Extra Care Housing by working with partner organisations to construct more than 1000 units of Extra Care Housing by 2028 to meet the growing demand for this accommodation type and population forecasts.
- The Extra Care Housing scheme to be developed on the Windlesford Green site is expected to deliver 62 Extra Care Housing apartments containing communal facilities open to the public. A planning application for the Windlesford Green scheme was submitted on 20<sup>th</sup> November 2020. The scheme will deliver 100% affordable rental units which significantly exceeds Affordable Housing Planning Policy requirements of 15% for the Rothwell ward and the Council will have nomination rights on 100% of these units for the first lettings, and 75% nomination rights on subsequent lettings.

- In order to realise the development of the land for Extra Care accommodation it is proposed that this site of surplus land be sold at less than best consideration.
- Under terms of the Development Agreement to be exchanged with the Council, the
  consortium which made up of Morgan Sindall Later Living (formerly known as
  Ashley House Ltd/Morgan Ashley LLP) and Home Group will be granted a licence
  to work on the site for the duration of the build programme. The land transfer will
  only complete once the consortium can evidence that the completed Extra Care
  scheme meets the specification included in the Development Agreement.

## 2. Best Council Plan Implications (click here for the latest version of the Best Council Plan)

- The Extra Care programme directly contributes to one of the Best Council Plan's 2020/21 outcomes of enabling residents with care and support needs to have greater choice and control.
- The delivery of the Extra Care programme also contributes to the Housing priority contained within the Best Council Plan 2020/21 by providing the right housing options to support older and vulnerable residents to remain active and independent.

## 3. Resource Implications

- Based on the minimum projected efficiency saving of £240.00 per week for an individual with high support needs living in an Extra Care scheme, applied against the Council exercising its 100% nomination rights for Windlesford Green, the proposed scheme will generate an estimated system cost saving of approximately £773,760 per annum when compared to the average cost of residential care (local authority and independent sector provision).
- This site is currently in the Council's capital receipt list. The anticipated receipt has been reduced to meet the expected receipt from the Extra Care scheme, rather than from an open market disposal.

#### Recommendations

Further to and as a consequence of previous Key Decisions made by the Council on this matter, Executive Board is recommended to:

- (i) Approve the sale of the land at Windlesford Green to the consortium made up of Morgan Sindall Later Living (formerly known as Ashley House Ltd/Ashley House LLP) and Home Group at a less than best consideration and on the terms detailed;
- (ii) Note that the Director of City Development, in consultation with the Executive Member for Resources, progresses with the disposal of the site;
- (iii) Approve that a Development Agreement be exchanged with the consortium;
- (iv)Approve that any subsequent amendments to the terms of the disposal be delegated to the Director of City Development to approve under the scheme of officer delegation, in consultation with the Executive Member for Resources.

## 1. Purpose of this report

- 1.1 The purpose of this report is to seek Board approval to dispose of a Council owned site on Windlesford Green in Rothwell (see Plan No 17041/M in Appendix 1) to facilitate the development of new Extra Care Housing in support of the Better Lives Programme established by Adults and Health. Approval is sought to sell the land to the recommended consortium of Morgan Sindall Later Living (formerly known as Ashley House Ltd/Morgan Ashley LLP) and Home Group at the less than best consideration identified in the attached exempt appendix.
- 1.2 The purpose of this report is also to recommend Members agree the final terms of the Development Agreement with the consortium which sets out the requirements of the Works and Services Specification and also gives a timetable for the development as per the terms of the call off contract for the delivery of an Extra Care scheme at Windlesford Green. Approval is sought for the Heads of Terms of the Development Agreement as detailed in the report and to enter into said Development Agreement with the consortium.

# 2. Background information

- 2.1 This report follows approval by Executive Board on 17th July 2017 and 19th December 2018 on reports both entitled 'Council House Growth Programme Delivery of Extra Care Housing'. Executive Board approved proposals for the delivery of Extra Care Housing for older people across the city as part of the Council House Growth Programme and to support the Better Lives Programme.
- 2.2 The resolutions at the above meetings, confirmed Executive Board's support for sites within Package 1 to be disposed of together with the possibility of disposal of sites at less than best consideration in order to deliver Extra Care Housing with higher levels of affordable housing than required under Planning Policy, along with delivering a wider social value impact, most notably in section 4.6.3 of the December 2018 report. The report stated that the four sites would attract higher offers for private residential developments on the open market than for the proposed specialist residential care use. Selling the land for specialist care use will therefore result in the Council not achieving best consideration. However, by progressing the proposals for new extra care housing as an alternative to other more expensive and less suitable options for those needing care and support, the Council expects it can also make significant financial savings.
- 2.3 Executive Board has previously considered similar recommendations based on the standard approach taken by the Council to assess the valuation of schemes and has approved the disposal of sites to various Registered Providers at less than best consideration in pursuit of housing growth and in recognition of the strategic benefits which will be achieved.
- 2.4 For the Windlesford Green scheme 100% of the scheme will be affordable rent. The Council will have 100% nomination rights units for the first lettings, followed by 75% nomination rights on subsequent re-lets for 60 years; delivering Extra Care Housing in an area where there is a current undersupply; and an opportunity to create employment and training opportunities. In all such cases, to comply with European State Aid Directives, where the land has been sold at a less than best consideration,

the terms of disposal would include restrictions to ensure that the site could only be used for the provision of Extra Care Housing or "alternative affordable provision" defined as "any alternative use of the Property to Extra Care Housing which is an affordable use as approved by Homes England and LCC" after completion of the build programme.

#### 3. Main issues

#### Appointment of an Extra Care Housing delivery partner

- 3.1 As part of the Better Lives Programme there has been a significant amount of research undertaken by Adults and Health to determine how Leeds City Council should respond to the predicted increase in the number of older people living longer with long term health conditions whilst improving individual choice in terms of how they access care and support. As set out in the Better Lives Programme Phase Three Report in September 2016 which was endorsed by the Executive Board, the Council continues to investigate opportunities to realign services to better fit the needs and aspirations of older people in Leeds and a key element of this approach has been the delivery of extra care housing as an alternative model to residential care under the auspices of the Extra Care programme.
- 3.2 The programme has been split into two packages. In Package 1 the schemes will be delivered and managed by an external provider with the Council having nomination rights on all affordable rented units. Package 2 will be delivered directly by the Council with all the units being let at affordable rent levels and managed by the Council.
- 3.3 Windlesford Green is one of the Council owned sites dedicated to the delivery of Extra Care Housing by Executive Board in July 2017. In accordance with the procurement strategy approved by Executive Board, the Council approached providers on the North Yorkshire County Council (NYCC) Extra Care Housing framework to gauge their interest in delivering the first four sites in Package 1 Westerton Walk, Ardsley and Robin Hood; Seacroft Crescent, Killingbeck and Seacroft; Windlesford Green, Rothwell; and Farrar Lane, Adel and Wharfedale.
- 3.4 The NYCC Extra Care procurement framework was used in 2018 to appoint a provider to design, build and operate Extra Care Housing on Windlesford Green, in addition to the three other Package 1 sites. Bidders were required to submit a net purchase offer for the Westerton Walk site and gross offers for the Seacroft Crescent, Windlesford Green and Farrar Lane sites.
- 3.5 Following the conclusion of the procurement process, the Director of Resources and Housing, in accordance with his delegated authority, approved the decision to enter into a contract with the recommended consortium made up of Morgan Sindall Later Living (formerly known as Ashley House Ltd/Morgan Ashley LLP) and Home Group for the development of the Package 1 sites. Windlesford Green will be the third site to be developed through this agreement.
- 3.6 At its meeting on 19th December 2018, Executive Board noted that responsibility for negotiating the terms and consideration of the Package 1 sites was delegated to the Director of City Development who would seek final approval of the final terms of disposal from Executive Board. Approval was given on 18th September 2019 by Executive Board to dispose of the Westerton Walk scheme at a less than best consideration.

#### The Windlesford Green site

- 3.7 The site is located off Holmsley Lane in Rothwell and is off a purpose access road which also leads to the Aspire Rothwell Fulfilling Lives Service, which was constructed in 2015 at the same time as the Holmsley Green supported living scheme for adults. The proposed Extra Care scheme is on the site of the former Rothwell ATC East building which measures approximately 0.71ha and was cleared in February 2016.
- 3.8 The site has been identified for Extra Care Housing due to high levels of demand for such provision in the Outer South locality. The Council has undertaken a comprehensive demand analysis of Extra Care Housing to identify the quantity and type of specialist older people's housing required across the city currently with forecasts up to 2028. There is currently no provision of Extra Care Housing in the Outer South Community Committee area where Windlesford Green is located.
- 3.9 A Development Agreement has been drafted and provisionally agreed between Leeds City Council and the consortium to carry out the Windlesford Green development in line with agreed plans and specifications, and is substantially on the main terms detailed in the report. The Development Agreement is based on the one exchanged for Westerton Walk which has worked well for both parties. This will ensure that the consortium meets the requirements of the Works and Services Specifications and also gives a timetable for the development as per the call off terms set out in Extra Care Housing for Older People contract DN336766.

# <u>Socioeconomic benefits resulting from the delivery of the new extra care accommodation</u>

- 3.10 The Council have added a contractual requirement to the agreement with the Consortium to ensure that 100% of the new development at Windlesford Green will be affordable homes for rent. This level of affordable housing significantly exceeds the minimum planning policy requirements of 15% for the Rothwell area.
- 3.11 Initial financial comparisons on the average cost of residential care (local authority and independent sector provision) versus extra care (based on the actual tendered cost of care package for Windlesford Green provided by the consortium) reveal that Extra Care Housing, even with all care recipients having high care and support needs, provides the opportunity to realise significant system cost savings. Further detail on expected savings to the Council is provided in the 'Resources and value for money' section.

#### Land disposal

- 3.12 The subject site is shown on Plan Number 17041/M in Appendix 1, and would be attractive on the open market for private residential developments, and would be likely to attract a higher offer for this use rather than for the proposed specialist Extra Care Housing uses. City Development has valued the site on an unrestricted basis.
- 3.13 Whilst selling the land for Extra Care Housing use will result in the Council not achieving best consideration for the site in accordance with s123 of the Local Government Act 1972, the socioeconomic benefits of delivering Extra Care Housing, as set out in paragraphs 3.10 and 3.11, must be taken into consideration by Executive

- Board. Having considered the benefits of the schemes to be delivered, together with the likely revenue savings that will be realised as set out in paragraph 4.44, Executive Board is therefore recommended to approve this sale at a less than best consideration.
- 3.14 Under the procurement process in 2018, which was awarded under contact DN336776, the consortium submitted a land offer for the scheme. The land offer was confirmed again in October 2018 as part of a mini-tender process under contract DN503285. Given that the Council will not be achieving best consideration, the Council will be foregoing £640,000 for the disposal of the site. Full details of the offer can be found in confidential appendix 3.

### Heads of Terms

- 3.15 In addition to the details included in the table above the main terms that will be incorporated into the Development Agreement comprise:
- Tenure All the units will be affordable and will be let at 'Affordable Rent' equivalent to 80% of the market rent.
- Nomination Rights the developer/purchaser will enter into a nominations agreement to grant the Council the right to nominate tenants for a period of 60 years to 100% of all new lettings and 75% of subsequent lettings of the affordable units.
- Freehold Transfer the freehold interest in the land will be transferred to the purchaser following satisfactory completion of the development.
- Payment 10% of the purchase price will be paid upon the signing of the Development Agreement with the remaining 90% payable upon satisfactory completion of the development and transfer of the freehold interest.
- Licences/easements the developer will be granted all the necessary licences to undertake the works.
- Rights of Access to allow access to the subject site rights of access will be granted over the unadopted access road shown Plan Number 17041/N in Appendix 4.

## Less than Best Consideration Implications

- 3.16 The Council is obliged, except in certain circumstances, to accept the highest offer received to fulfil its legal obligation to achieve best consideration for the disposal of its property assets under S123 of the Local Government Act 1972. Land and Property Officers have assessed the market value of the subject site for its most economically viable use of private residential housing. Selling the site for the proposed use of Extra Care residential accommodation as detailed above would mean that the Council is disposing of the property for a 'less than best' consideration. Adults and Health project a cost saving of £773,760 per annum, based on 100% the scheme being affordable rent with the 100% nomination rights.
- 3.17 Legal services have advised that Local authorities have a general statutory power to dispose of land in any manner they wish, under section 123 of the Local Government Act 1972. However, unless the government consents, usually the

disposal must not be for less than the best consideration that can reasonably be obtained.

- 3.18 It is government policy that authorities should dispose of surplus land wherever possible. Generally it is expected that land should be sold for the best consideration that can reasonably be obtained, but it is recognised that there may be circumstances where an authority considers it appropriate to dispose of land at an under-value. Consequently, the government has a power to give authorities consent to dispose of land for less than the best consideration that can reasonably be obtained. Consents can be given on a general basis, or for specific disposals.
- 3.19 The General Disposal Consent (England) 2003 allows local authorities to dispose of any interest in land at less than the best consideration that can reasonably be obtained subject to the following conditions:
  - (a) the authority must be of the opinion that the disposal is likely to contribute to the promotion or improvement of the economic, social or environmental well-being of their area or people living or working there; and
  - (b) the difference between the less than best value of the land and the actual consideration for the disposal must not exceed £2,000,000.
- 3.20 Section 31 of the Housing Act 1985 authorises the council to sell land for the purpose of providing housing of any description at such price, or for such consideration, or for such rent, as having regard to all the circumstances of the case is the best that can reasonably be obtained, notwithstanding that a higher price, consideration or rent might have been obtained if the land were sold, exchanged or leased for the purpose of providing housing of another description or for a purpose other than the provision of housing.

#### State Aid

3.21 As referred to in paragraph 3.3, the site was marketed on the North Yorkshire County Council Extra Care Framework for Extra Care, for a restricted use, which potentially reduces the value. A local authority may impose restrictions limiting value provided that a private sector landowner in the same position as the Council would have acted in the same way and that the Council imposes the same restriction regardless of the identity of the purchaser.

#### Construction

- 3.22 Under the terms of the Development Agreement to be exchanged, the consortium will be required to work under licence for the duration of the build programme. The land transfer will complete once the consortium can evidence that the completed Extra Care Housing scheme meets the specification included in the Development Agreement.
- 3.23 A planning application was submitted by the consortium on 20th November 2020 following consultation with local ward members in October 2020. Consultation events took place with local residents prior to the pandemic in late 2019.
- 3.24 Start on site is expected at the Windlesford Green scheme in April 2021, with completion expected in October 2022.

# 4 Corporate considerations

#### 4.1 Consultation and engagement

- 4.1.1 Consultation has taken place with the Rothwell Ward Members throughout the duration of the project with regular briefing notes during the pre-tender and tender period. Consultation has also taken place with Executive Member for Health, Wellbeing and Adults, Executive Member for Resources and Executive Member for Communities. Regular briefings will continue to take place for the duration of the project.
- 4.1.2 Council officers and representatives from the consortium have met with Ward Members during the design stage of the project. Most recently consultation took place on 23<sup>rd</sup> October 2020 to discuss the final scheme design and usage proposals. Throughout the project the feedback received has been positive and both Ward Members support the development of an Extra Care Scheme on this site.
- 4.1.3 A communications plan has been prepared and is now being implemented for the scheme delivery. This details how the Council and the consortium engage with key stakeholders, including Ward members and local residents, throughout all stages of project delivery. It also describes the multiple consultation events held for local residents which formed part of the statutory planning public consultation process.

# 4.2 Equality and diversity / cohesion and integration

4.2.1 The proposals for Extra Care Housing at Windlesford Green will deliver 47 one bed apartments and 15 two bed apartments for older people with medium to high level care needs.

#### 4.3 Council policies and the Best Council Plan

- 4.3.1 The Extra Care programme directly contributes to one of the Best Council Plan's 2020/21 outcomes of enabling residents with care and support needs to have choice and control.
- 4.3.2 The delivery of the Extra Care programme also contributes to the Housing priority contained within the Best Council Plan 2020/21 by providing the right housing options to support older and vulnerable residents to remain active and independent.
- 4.3.3 The programme supports the delivery of the Better Lives programme through:
  - Supporting the health and well-being of older people who wish to live independently
  - Providing an alternative to residential care
  - Ensuring that older people have a wider choice of housing and care options including the provision of person centred care and support

• Increasing the supply of specialist homes for older people that are for rent, shared ownership and for sale.

## **Climate Emergency**

- 4.3.4 The consortium has committed to delivering a scheme which offers low running costs to tenants at the Windlesford Green site through energy efficient designs and also ensures sustainable operation of the building by ensuring that the development meets the Council's core strategy policies EN1 (Climate Change Carbon Dioxide) and EN2 (sustainable design and construction).
- 4.3.5 A Travel Plan, which is aimed at promoting greener, cleaner travel choices and reducing the reliance on the private car, has been produced for both developments. The Travel Plan will be managed by a Travel Plan Co-ordinator who will carry out a questionnaire survey of the residents travel patterns and preferences. A subsequent action plan will be developed which aims to promote sustainable travel and reduce the number of car-borne trips.
- 4.3.6 The consortium is committed to offering opportunities for local training and employment and the engagement of local supply chain partners linked to the programme. 'Meet the Buyer' events will be arranged, taking into account social distancing measures, prior to start on site to encourage local suppliers and the consortium has also committed to engaging with Leeds Building College regarding training and apprenticeship opportunities.

## 4.4 Resources, procurement and value for money

- 4.4.1 A multi-disciplinary cross directorate team has been established to deliver the project. This includes representatives from the Council Housing Growth Team, Housing Management, Adults and Health and City Development. The day to day management of the project is led by the Director of Resources and Housing who is working in partnership with the Director of Adults and Health.
- 4.4.2 If the site is sold the Council will cease to be responsible for the current and future maintenance liabilities for it.
- 4.4.3 This site is currently in the Council's capital receipt list. The anticipated receipt has been reduced to meet the expected receipt from the Extra Care scheme, rather than from an open market disposal.
- 4.4.4 Initial financial comparisons on the average cost of residential care (local authority and independent sector provision) versus Extra Care Housing (based on the actual tendered cost of care package provided by the consortium) reveal that Extra Care Housing, even with all care recipients having high care and support needs, provides the opportunity to realise significant system cost savings. Based on the minimum projected efficiency saving of £240.00 per week for an individual with high support needs is applied against 100% of the scheme being affordable rent and the Council receiving 100% nomination rights for the Windlesford Green development, this would generate an estimated system cost saving of approximately £773,760 per annum.

## 4.5 Legal implications, access to information, and call-in

- 4.5.1 The site has been declared surplus to operational requirements and no operational reason has been identified to justify its retention. In these circumstances, where recommended, a disposal represents prudent and economic asset management, obviating holding costs associated with managing the land.
- 4.5.2 The subject site is held by the Council under the Local Government Act 1972. Under s123 of the Local Government Act 1972 the council may not dispose of land for a consideration less than the best that can be reasonably obtained in the market, except with the express consent of the Secretary of State. This disposal would be permitted by the General Disposal Consent (England) 2003, which permits disposal of any interest in land at less than best consideration where the council considers it will help it to secure the promotion or improvement of the economic social or environmental well-being of its area, subject to the condition that the undervalue (i.e. the difference between the consideration obtained and the best consideration that can reasonably be obtained) does not exceed £2million.
- 4.5.3 The recommendations in this report are linked to key decisions dated 21st September 2016, 17th July 2017, 21st November 2018 and 19th December 2018 and therefore this will be a Significant Operational Decision as it is a direct consequence of the previous Key Decisions taken. The report is subject to call-in.
- 4.5.4 The information in the confidential appendix of this report has been identified as exempt because it contains information relating to the financial or business affairs of the council and the consortium.
- 4.5.5 The information contained in the confidential is exempt under Access to Information Rule 10.4 (3) as it contains information relating to the financial or business affairs of a particular person (including the authority holding that information). It is considered that since this information was obtained through one to one negotiations for the property/land then it is not in the public interest to disclose this information at this point in time as this could affect the integrity of the disposal of the property/land. It is considered that the public interest in maintaining the content of appendices as exempt outweighs the public interest in disclosing the information as doing so would prejudice the Council's commercial position and that of third parties should they be disclosed at this stage.

## 4.6 Risk management

- 4.6.1 The risks associated with the proposed land disposals are outlined in the attached confidential appendix.
- 4.6.2 The risks associated with the proposed development have been identified, and mitigating actions put in place, prior to LCC entering into the Development Agreement:
  - The site not being used for its intended purpose A covenant will be included in the land transfer to ensure that the developments will be used for Extra Care Housing or "alternative affordable provision" defined as "any alternative use of the Property to Extra Care Housing which is an affordable use as approved by Homes England and LCC" after completion of the build programme.

- The agreed specification is not met The land transfer can only complete
  once the consortium can evidence that the completed Extra Care schemes
  meet the specifications included in the Development Agreement.
- Poor Contract Management this will be mitigated through monthly performance meetings with the consortium.
- Damage to the Council's Reputation this has be mitigated through a robust communications plan which the Council have developed in conjunction with the consortium to ensure that local residents, ward members and other key stakeholders are fully engaged at pre-planning stage, through to the construction period.

#### 5 Conclusions

- 5.1 The project will contribute to the Council's strategic objective of delivering the Leeds Vision for Extra Care Housing by working with partner organisations to construct more than 1,000 units of Extra Care Housing by 2028 to meet the growing demand for this accommodation type and population forecasts.
- 5.2To realise the development of the Windlesford Green site for Extra Care Housing accommodation it is proposed that the surplus site be sold at a less than best consideration, as detailed in the attached confidential appendix.
- 5.3 The site has been identified for Extra Care Housing due to high levels of demand for such provision in the Outer South locality. Adults and Health have undertaken a comprehensive demand analysis of Extra Care Housing to identify the quantity and type of specialist older people's housing required across the city currently with forecasts up to 2028.
- 5.4 Executive Board has previously considered similar recommendations for the sale of land to Registered Providers at a less than best consideration for the building of affordable housing. This has been in pursuit of housing growth and in recognition of the strategic benefits which will be achieved by the proposed developments. The benefits of the proposed scheme on the subject land include 100% affordable rented units with full nomination rights for the first lettings, followed by 75% nomination rights on subsequent lettings for a period of 60 years; delivering Extra Care Housing in an area where there is a current undersupply; and an opportunity to create employment and training opportunities. In all such cases the terms of disposal would include restrictions to ensure that the site could only be used for the provision of Extra Care Housing.
- 5.5 The Council have added a contractual requirement to the Development Agreement to ensure that 100% of the new development at Windlesford Green would be affordable homes for rent. This level of affordable housing significantly exceeds the minimum planning policy requirements of 15% for the Rothwell area.

#### 6 Recommendations

- 6.1 Further to and as a consequence of previous Key Decisions made by the Council on this matter, Executive Board is recommended to:
  - (i) Approve the sale of the land at Windlesford Green to the consortium made up of Morgan Sindall Later Living (formerly known as Ashley House Ltd/Morgan Ashley LLP) and Home Group at a less than best consideration and on the terms detailed;
  - (ii) Note that the Director of City Development, in consultation with the Executive Member for Resources, progresses with the disposal of the site;
  - (iii) Approve that a Development Agreement be exchanged with the consortium;
  - (iv) Approve that any subsequent amendments to the terms of the disposal be delegated to the Director of City Development to approve under the scheme of officer delegation, in consultation with the Executive Member for Resources;

# 7 Background documents<sup>1</sup>

7.1 None.

# 8 Appendices

8.1 Appendix 1 – Windlesford Green purchase boundary

- 8.2 Appendix 2 Windlesford Green EIA Screening
- 8.3 Confidential Appendix 3 Windlesford Green land offer
- 8.4 Appendix 4 Windlesford Green Rothwell Access

<sup>&</sup>lt;sup>1</sup> The background documents listed in this section are available to download from the council's website, unless they contain confidential or exempt information. The list of background documents does not include published works.