

# A303 Sparkford to Ilchester Dualling Scheme TR010036

## 9.27 Deadline 6 Report

Planning Act 2008

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## Infrastructure Planning

Planning Act 2008

# A303 Sparkford to Ilchester Dualling Scheme

Development Consent Order 201[X]

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## Deadline 6 Report

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# 1 Deadline 6 Report

## 1.1 Introduction

- 1.1.1 This report provides the Applicant's responses to certain submissions from Interested Parties as part of Deadline 5; the Applicant has responded to points included within submissions from Somerset County Council, South Somerset District Council, and the Parish Councils (Queen Camel, West Camel and Sparkford).
- 1.1.2 The Applicant has also submitted a number of documents as part of Deadline 6 in response to previous Action Points and commitments made during the course of the Examination.

## 1.2 Somerset County Council

- 1.2.1 The Applicant has responded to Somerset County Council's points in relation to protective provisions, Action Point 8, and Action Point 34, detailed within Somerset County Council's Deadline 5 submission (REP5-032).

### Protective Provisions

- 1.2.2 The Applicant notes that Somerset County Council will be providing detailed comments on the protective provisions and draft Development Consent Order (dDCO) at Deadline 6. The Applicant will therefore respond to these comments at Deadline 7.

### Action Point 8 Report of discussions between the parties on potential design change on road passing Camel Hill Services and other proposed cul-de-sacs

- 1.2.3 The Applicant notes Somerset County Council's submission in REP5-032 in response to Action Point 8 and discussions between the parties on the potential design change on the road passing Camel Hill services and other proposed cul-de-sacs.
- 1.2.4 The Applicant notes Somerset County Council's submissions that the area of road passing Camel Hill Services would be liable to anti-social behaviour including illegal gypsy and traveller encampments. The Applicant has already agreed to investigate design measures to ensure that this road is not used at excessive speed in progressing the detailed design of this section. The Council has not sought any other design changes.
- 1.2.5 The Applicant submits that the Council has produced no evidence for the conjecture that anti-social behaviour will occur and has not provided any record of illegal gypsy encampments in this location where there are already areas of unused ground near the highway which could be used as encampments. The Council has provided nothing more than anecdotal evidence of problems with gypsy travellers in the area some years previously. The Applicant again also notes that, in any case, it is not the Applicant's statutory role to deal with anti-social behaviour in the form of illegal gypsy and traveller encampments, and that those powers have been given by Parliament to Somerset County Council and the Police.

- 1.2.6 It is noted that Somerset County Council sets out in their submission that they consider there is a need for the Applicant to consider other options. However, they make no proactive or positive suggestions on how their concerns could be addressed. Somerset County Council has separately suggested to the Applicant that this road should remain part of the strategic road network or should become a private road. The Applicant objects to these suggestions. The Council is seeking to have this road inappropriately retained as part of the strategic road network based on conjecture and an un-evidenced, unsupported position that there may be anti-social behaviour in the form of illegal gypsy encampments in the future.
- 1.2.7 The strategic road network in England is made up of motorways, trunk roads and the most significant A-class roads. The purpose of the strategic road network is to move large volumes of traffic safely and efficiently, not to provide localised access. This road, once de-trunked, would serve a diner business, a filling station business, a consented plot for a coffee shop business and access to land; it is clearly a local highway.
- 1.2.8 The Applicant notes Somerset County Council's submission that this road would provide little if any public utility. The Applicant strongly disagrees. Part of the purpose of the local highway network is to provide access to properties. In this instance, not only does this road provide access to private property, it also provides public access to two operational businesses and one consented business use site. It is not reasonable for Somerset County Council to suggest that these businesses should be cut off from the local road network.
- 1.2.9 The Council is being inconsistent on this point; it is noted that the County Council is advancing the argument of no public utility only in this case where there are two businesses which are open to the public. However there are a number of other dead end and cul-de-sac roads within the area which serve a small number of properties, or in some cases one property, and the Council have not made a similar argument that these should be removed from the local road network. The Council has not for example suggested that Blackwell Lane, providing access to a limited number of properties, should be removed from the local road network.
- 1.2.10 As set out, the strategic highway authority considers that this part of roadway should not form part of the strategic road network. The Applicant considers that changing the status of the road to the diner and the petrol filling station, as well as the consented coffee shop location, into a private road would be detrimental to those businesses. It would transfer liability for a road, which is required to be open to use by the public in order for these businesses to thrive, to a private road which these businesses then have to maintain. It would be unreasonable that these businesses, while paying taxes and rates, would not benefit from the current provision of access to a publicly maintainable highway. The Applicant does not consider that this is a realistic or fair suggestion and will not be promoting it.
- 1.2.11 The Council appears simply to have an un-evidenced fear that this road will, for some reason, result in difficulty for them, has made no proactive suggestions on how to address it and now simply wishes to inappropriately make this highway the responsibility of the any other party despite this properly being a local road.

### **Action Point 34 Examples of DCOs where payment has been made to authority undertaking approvals and/or monitoring**

1.2.12 In the Examining Authority's Hearings Action Points (EV-007), a request was made for Somerset County Council and South Somerset District Council to provide examples of previous DCO schemes where the discharging authority had received payments from the Applicant in connection with the process for the discharge of DCO requirements.

1.2.13 The Applicant notes Somerset County Council's response to Action Point 34 (Deadline 5 submission, REP5-032) provided the following examples:

- A14 Cambridge to Huntingdon Improvement Scheme DCO
- A556 Knutsford to Bowden Improvement Scheme DCO
- A30 Temple to Higher Carblake Improvement Order DCO (where the Applicant is an Interested Party / Prescribed Consultee)
- A1 – South East Northumberland Link Road: Morpeth Northern Bypass (where the Applicant is an Interested Party / Prescribed Consultee)
- M5 J25 Improvement Scheme
- Hinkley Point C Development Consent Order
- Hinkley Point C Connection Project DCO

1.2.14 The Applicant's response to the examples provided and further commentary on this matter is set out below.

1.2.15 The Action Point arose following previous submissions on the discharge of requirements and associated fees by Somerset County Council (within the Joint LIR (REP2-019), at Deadline 3 (REP3-014), at Deadline 4 (REP4-035), and at Deadline 5 (REP5-032). The Applicant has responded to this matter at Deadline 2 (REP2-004), Deadline 3 (REP3-003) and Deadline 4 (REP4-018), Deadline 5 (REP5-020 and REP5-025).

#### ***Discharging Authority***

1.2.16 For clarity and the avoidance of doubt, the Applicant maintains its firmly held position that the discharging authority for all requirements (including Requirement 12) should be the Secretary of State and not Somerset County Council. Somerset County Council will be consulted on the detailed design under Requirement 12 and the details of that consultation (including changes sought and whether they have been made and where changes have not been made why not), must be submitted along with the application for approval of the detailed design. The consultation response provided by Somerset County Council will be submitted to the Secretary of State and will therefore be accounted for in the decision-making process.

1.2.17 The mechanism proposed for the discharge of requirements within the draft DCO for the scheme is well-established and is bespoke to the unique circumstances within which Road Improvement Schemes are delivered. The approach has been approved by the Secretary of State for six of the

Applicant's seven consented Nationally Significant Infrastructure Projects (NSIPs).

- 1.2.18 The one scheme which utilises a different approach (the A19/A1058 Coast Road Junction Improvement) was determined at the time the Highways Agency was transitioning into Highways England. The Examining Authority for that scheme felt that the uncertainty surrounding the future role and remit of Highways England meant that the Local Planning Authority (LPA) was best placed to act as discharging authority until a suitable new approach was established. It should be noted that the Applicant's draft DCO identified the 'undertaker' (i.e. Highways Agency / Highways England) as the discharging authority as opposed to the Secretary of State. The urban nature of the area around the scheme and the proximity of residential areas was also identified by the Examining Authority as a scheme-specific matter of particular weight in support of the LPA-based approach.
- 1.2.19 Notwithstanding the above, and somewhat tellingly, the four Highways England NSIPs subsequently consented (since January 2016) all included provisions for the Secretary of State to act as discharging authority (not the 'undertaker' or the 'relevant planning authority' as was the case for the A19/A1058 DCO). Furthermore, the mechanism to allow the SoS to act as discharging authority is proposed within the four Highways England NSIPs currently at Examination.
- 1.2.20 In light of the above, it is clear that the approach which places the Secretary of State as the discharging authority is accepted and established and has been thoroughly tested at Examination. There is no justifiable reason to deviate from this approach for the A303 Sparkford to Ilchester Dualling DCO.

### **Payment of Fees**

- 1.2.21 The scheme is being determined under the Planning Act 2008. The Planning Act does not include any provisions for the payment of fees to consultees in relation to costs incurred in responding to consultation. S104 of the Planning Act 2008 dictates that the National Policy Statement for National Networks (NPSNN) provides the relevant statutory framework for deciding NSIP applications on the national road and rail networks in England.
- 1.2.22 With respect to planning obligations, the NPSNN states:
- 1.2.23 *'4.10 Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development'*.
- 1.2.24 It is the Applicant's view that Somerset County Council is seeking a role as discharging authority which diverges from established and tested DCO provisions. In addition, the fact that Somerset County Council is seeking to recover its costs for undertaking this role from the applicant clearly highlights that Somerset County Council does not have the resources to act as discharging authority and therefore cannot justifiably request this role.
- 1.2.25 Simply put, Somerset County Council cannot seek payment for a role which it does not need to undertake.

1.2.26 With respect to the examples cited by Somerset County Council of instances where the discharging authority had received payments from the Applicant in connection with the process for the discharge of DCO requirements, these are either not comparable to the scheme or are irrelevant.

#### A14 Cambridge to Huntingdon

1.2.27 It is the Applicant's position that the A303 Sparkford to Ilchester Dualling and the A14 Cambridge to Huntingdon schemes are so fundamentally different that a comparison between the two cannot, and should not, be made. The A14 scheme is a multi-faceted project to improve and upgrade a 23-mile length of the A14 trunk road between Cambridge and Huntingdon, the widening of a 2-mile stretch of the A1 between Alconbury and Brampton, and the modification and improvement of the associated local road network within this corridor, at a total cost of £1.5bn. In comparison, the A303 dualling is a £171m scheme to upgrade circa 5.5 kilometres of the A303. The two schemes are therefore fundamentally different in terms of scale and complexity. It should be noted that despite the significant scale and complexity of the A14 scheme in comparison to the A303 scheme, no fees were paid to Cambridge County Council in relation to consultation on applications to discharge requirements.

#### A556 Knutsford to Bowden

1.2.28 The A556 DCO included a series of requirements which identified the Secretary of State as the discharging authority. It is acknowledged that a legal agreement under s1 of the Localism Act was entered into, but this did not relate to the discharge of requirements (as CEC were not the discharging authority), and nor did it relate to CEC's role as a consultee.

1.2.29 The Examining Authority for the A556 DCO concluded (and the Secretary of State agreed) that the legal agreement proposed was:

- necessary and proportionate in relation to the proposed development in order to make the development acceptable in planning terms;
- directly related to the proposed development and
- fairly and reasonably related in scale and kind to the development.

1.2.30 The rationale for this conclusion was that the Planning Agreement under s1 of the Localism Act provided for: (i) funding for future maintenance of the de-trunked existing A556 (in recognition of the poor state of the road), and (ii) payment of a further sum to enable CEC to undertake additional minor highway works should they prove necessary together with measures to monitor and mitigate air quality issues on the A556 south of M6 Junction 19. The section of the A556 that was to be de-trunked under the DCO was in a state of disrepair and as such the fund was put in place to help address this – a similar situation does not exist at the A303 as regular operational maintenance activities have been ongoing throughout the Scheme's development as per Highways England's operational maintenance programme. The contributions sought by Somerset County Council are simply to allow them to monitor and supervise the de-trunking works, and to be paid to respond to consultation requests under DCO requirements –



neither of which are necessary in order to make the development acceptable in planning terms.

### Hinkley Point C

- 1.2.31 Somerset County Council has also referenced two DCOs associated with the development of a new nuclear power station at Hinkley Point C. It is the Applicant's view that a comparison cannot be drawn between the development of a nuclear power station, at an estimated cost of over £20bn, and the A303 scheme. The economic cases for the two schemes are entirely different and Somerset County Council's reference to the HPC DCO entirely fails to recognise that the Applicant for the A303 scheme is a competent highway authority providing public infrastructure (which is publicly funded), not a private developer promoting a profit-making development.
- 1.2.32 With respect to the examples cited by Somerset County Council where Highways England are an Interested Party / Prescribed Consultee, these relate to schemes where the Local Highway Authority is undertaking works on the Strategic Road Network. In these cases, the Section 6 agreements are justified on the basis that a local highway authority is undertaking works to the strategic road network for which the Applicant is the Strategic Highway Authority under powers delegated by the strategic highway authority through the agreement. This is simply not comparable with the situation for the A303 where the Applicant, as the strategic highway authority, is undertaking works for the improvement of its own network before de-trunking those sections of road that are no longer part of the Strategic Road Network to the appropriate authority and making necessary, consequential changes to the local highway network. This is similarly the case for the M5 J25 Improvement Scheme referred to where Somerset County Council will be undertaking works to the strategic road network, for which Highways England has responsibility. The Applicant is not seeking and does not require delegation of statutory powers from Somerset County Council as the DCO provides the necessary authority directly. The Applicant accordingly does not accept that the facts underlying the section 6 agreement provisions are comparable to the DCO or that section 6 style obligations should be imposed.
- 1.2.33 The Applicant considers that the thrust of this point relates to Somerset County Council's role as discharging authority on both mentioned Hinkley Point C DCOs. The Applicant has previously responded in detail as to its firmly held position on the best placed body to discharge DCO requirements for the A303 scheme – the Secretary of State, as detailed in the Applicant's response to Written Question 2.10.2 in REP5-025.

### **Conclusion**

- 1.2.34 A summary of the discharge and fee payment provisions of consented Highways England schemes are set out below in Table 1.1. Significantly, the single DCO secured by the Applicant where the LPA had a role as discharging authority did not include any provisions or legal agreements in respect of the payment of fees by the Applicant to the LPA. In those instances where the payment of fees was agreed, these were either related to future maintenance or highway works and considered necessary to make the development acceptable in planning terms, which is not the case for the A303,

or related to minor costs such as inspections. In light of this, the examples provided by Somerset County Council are clearly isolated incidents which do not justify the role and payment provisions sought by the Council. In comparison to other made Highways England DCO, there are far more examples of where the Secretary of State is the discharging authority and no payment of fees has been agreed for either a discharging function or for consultation responses. On this basis, the Applicant submits that there is simply no justification for Somerset County Council's position.

Table 1.1: Summary of the discharge and fee payment provisions of consented Highways England schemes

Consented Schemes				
Name of Scheme	Date of Decision	PINs Reference	Discharging Authority	Payment of fees
A556 Knutsford to Bowdon Scheme	28 August 2014	TR010002	Secretary of State	A s106 agreement was entered into which provided contributions to be made to the LPA in relation to the future maintenance of the de-trunked existing A556 and payment of a further sum for additional minor highway works.  Examining Authority, and SoS, concluded that the contributions were <b>necessary and proportionate in relation to the proposed development in order to make the development acceptable in planning terms.</b>
A160 - A180 Port of Immingham Improvement	4 February 2015	TR010007	Secretary of State	No fees payable to LPA.
A19/A1058 Coast Road Junction Improvement	28 January 2016	TR010017	Relevant planning authority.	No fees payable to LPA.
A14 Cambridge to Huntingdon Improvement Scheme	11 May 2016	TR010018	Secretary of State	Fees agreed for inspection and design and check.
M4 Junctions 3 to 12 Smart Motorway	2 September 2016	TR010019	Secretary of State	No fees payable to LPA.
M20 Junction 10A	1 December 2017	TR010006	Secretary of State.	No fees payable to LPA.
A19 / A184 Testos Junction Improvement	12 September 2018	TR010020	Secretary of State.	No fees payable to LPA.

### 1.3 South Somerset District Council

1.3.1 The Applicant has responded below to South Somerset District Council's responses to questions 2.5.6 and 2.6.8 of the Examining Authority's Second Written Questions, as detailed within South Somerset District Council's Deadline 5 submission (REP5-033). The Applicant has also responded to

South Somerset District Council's response to Action Point 31, which was also included in its Deadline 5 submission (REP5-033).

## **Second Written Question 2.5.6**

### ***Visual receptors 14 and 17***

- 1.3.2 The Applicant has included a commitment within the Outline Environmental Management Plan (OEMP) (which will be a certified document under Article 43 of the DCO) in relation to visual receptors 14 and 17 to investigate the retention of some long-distance views, whilst still ensuring that the proposed Downhead Junction is screened by the proposed planting to the north.
- 1.3.3 Commitment L5 within Table 3.1 Register of Environment Actions and Commitments (REAC) in the OEMP now states *"A review of the landscape design as part of the environmental masterplan to be undertaken to ensure the retention of long-distance views from the PRow along Slate Lane looking south. It will be important to ensure that these long-distance views are designed whilst still ensuring the screening of views to the proposed Downhead Junction are retained. Consultation with South Somerset District Council's Landscape Architect as part of the detailed design when retaining these long-distance views is required"*.

### ***Visual receptors 27 and 28***

- 1.3.4 The Applicant has included a commitment within the OEMP in relation to visual receptors 27 and 28 to investigate other means of screening that would be more in keeping with the rural character, such as a stone-faced bund as suggested by South Somerset District Council's Landscape Architect.
- 1.3.5 Commitment L6 within Table 3.1 REAC in the OEMP now states *"Investigate other means of screening the proposed A303 from Camel Hill farm that would be more in keeping with the rural character, such as a stone-faced bund. Consultation with South Somerset District Council's Landscape Architect to be undertaken as part of the detailed design when designing the visual screening in this location"*.

### ***Visual receptor 35***

- 1.3.6 Following a meeting with South Somerset District Council and Historic England in March 2019 in relation to Hazlegrove House Registered Park and Garden, the Applicant investigated the possibility of extending Bund 7 to the east in order to avoid the need for the timber fence alongside the proposed dual carriageway in the south-east corner of the park. However, this was not possible as it would have compromised proposed drainage outfalls from the carriageway. Instead it is proposed to provide additional localised screening planting at this location to soften the appearance of the fence. The Environmental Masterplan has been updated to reflect this and includes an additional area of planting of trees and shrubs that are mature enough to aid the screening of the proposed environmental barrier at Year 1.

## **Second Written Question 2.6.8**

- 1.3.7 The design of the bridges to ensure they are reflective of the character of the local area is a detailed design matter. The Applicant has included a commitment within the OEMP in relation to the design of the bridges.

- 1.3.8 Commitment L7 within Table 3.1 REAC in the OEMP now states “*Investigate the design of the proposed bridges at Hazlegrove and Downhead Junctions to ensure they are reflective of the local landscape or the A303 corridor. This should be undertaken in consultation with South Somerset District Council, who have suggested the use of local stone facing panels or pier substructures*”.
- 1.3.9 There is no need for an additional requirement to be added to the dDCO because the OEMP is a certified document and approval of detailed design (upon which South Somerset District Council will be consulted) is already secured by Requirement 12. The detailed design of the bridges will form part of the items to be approved under this Requirement.

### **Action Point 31**

- 1.3.10 It is noted in the South Somerset District Council submission REP5-033 that the District Council have included a map showing a buffer which they consider should be the limits of what can be considered ‘adjacent’ for the purposes of the DCO. The Applicant strongly objects to that proposal. The buffer would undermine the utility of this provision to the point of making it not worth including. It would also mean that the Applicant could not carry out the changes to road traffic regulation orders which have been agreed with Somerset County Council.
- 1.3.11 The Applicant notes that it was the District Council who suggested in hearings that this power could be used, should it be necessary, for traffic management through villages during construction. The buffer plan put forward by the District Council does not align with that suggestion and would not allow such use. As the Applicant has previously submitted, it is considered that adjacent should be defined on the facts and circumstances of being necessary or desirable in connection with the project.
- 1.3.12 For example, it has been requested by the County Council that a speed limit between this scheme and Yeovilton be amended as it is not desirable, in the local highway authority’s view, to have an area of national speed limit between two restricted speed limits. The Applicant agrees and is happy to use this power to carry out change. The use of this power being constrained as suggested by the District Council would not comply with the agreement being reached on the facts and circumstances with the County Council.

## **1.4 Parish Councils (Queen Camel, West Camel and Sparkford)**

- 1.4.1 The Applicant has responded below to the Parish Council’s responses to the questions 2.6.1, 2.7.6, 2.7.8 and 2.8.1 of the Examining Authority’s Second Round of Written Questions, as detailed within the Parish Council’s Deadline 5 submission (REP5-034).

### **Second Written Question 2.6.1 Blackwell Lane Proposed Change**

- 1.4.2 Following discussions with local landholders and businesses the Applicant is aware of the need to ensure that access is maintained from Blackwell Road into Traits Lane. The Parish Councils are correct to say that the junction is currently used by farm machinery and other vehicles, but from visiting the site it can be seen that significant damage has been caused to the verges from

overrunning of large vehicles. In addition, local businesses have told us that large vehicles can struggle to negotiate the junction. For these reasons, the Applicant is proposing to improve the junction. The Applicant does not believe that widening the junction will encourage any more vehicles because Traits Lane will become a no-through road.

### **Second Written Question 2.7.3, 2.7.4 and 2.7.5**

- 1.4.3 Proposals for an additional parallel road are not part of the proposed scheme for which the DCO application was submitted, and the Applicant is therefore not considering any proposals for a parallel road during the Examination.
- 1.4.4 The Applicant considers that there is already a local parallel road (West Camel Road) that runs to the south of the existing A303 which will continue to be used by local traffic used following construction of the proposed scheme.

### **Second Written Question 2.7.6 NMU Routes**

- 1.4.5 The Applicant originally proposed a bridleway through the MOD signalling station, but this was not agreeable to the MOD who are the landholder. As such a footpath has been proposed and agreed.
- 1.4.6 As an alternative, cyclists and horse riders (who are less sensitive than pedestrians to small increases in journey length) will be able to travel down Traits Lane to Blackwell Road and then along Blackwell Road to Gason Lane. Traits Lane is proposed to become a no-through road, so traffic will only be using Traits Lane to access local businesses and properties.

### **Second Written Question 2.7.8 Sparkford High Street**

- 1.4.7 The Applicant has checked with Somerset County Council to confirm that they have had a Speed Indicator Device (SID) located on Sparkford High Street. These are variable message devices used to warn drivers of their speed when exceeding the speed limit. The equipment uses radar-based sensors for monitoring. Somerset County Council has confirmed that SID monitoring data is collected for a single direction of traffic. The counts of vehicles are often low due to the device being unable to count static/queuing traffic or bunching traffic. SID count data is not very accurate and should not be relied on for traffic volume data. SID data collection is used to look at speed trend and check that the device is doing its job of slowing traffic. It would also not be recommended to use the data for accurate speed collection as the data is skewed as the device itself encourages a reduction in speed.

### **Second Written Question 2.8.1 Climate Change**

- 1.4.8 The proposed culvert under the dual carriageway (reference CU\_3270 shown on Figure 1 below, which is an extract of the drainage strategy drawings contained within Appendix A of the Drainage Strategy Report, APP-060) is only intended to convey natural surface water runoff which would otherwise run onto the new connecting carriageway and the new dual carriageway – such drainage is annotated on Figure 1 below and the plans within Appendix A of the Drainage Strategy Report (APP-060) with the initials 'ND'. Runoff from the highway surface of the new connecting carriageway and the existing surface of the Steart Hill highway (north of the proposed dual carriageway) will

be conveyed to the new dual carriageway drainage system where it will be attenuated and then eventually discharged to the River Cary.

- 1.4.9 A short section of Howell Hill will be realigned to reconnect to the de-trunked existing A303 and runoff from this section of highway will discharge, without attenuation, into the existing Howell Hill drainage system. However, the surface area of this section will be less than the section of Steart Hill highway being diverted into the dual carriageway system and therefore the proposed design is considered to provide a betterment than the existing case.

Figure 1: Extract of plan contained within Appendix A of the Drainage Strategy Report (APP-060)

