

<b>Duty to Co Operate</b>	<b>Ref:</b>
<b>Date:</b> <ul style="list-style-type: none"> <li>• Chief Executives 6 June</li> <li>• Leadership Board 18 June</li> </ul>	
Jane Robinson	

## 1. Purpose of report

2. In order for a Local Plan to be found 'sound' the Local Planning Authority must show that it has co operated with adjoining authorities. This report details the work that has taken place so far in respect of cataloguing co operation on such issues between the authorities. The Appendix to this report contains a schedule of strategic land use issues for agreement between the seven local authorities.

## Background

3. A Memorandum of Understanding was agreed on the 5 October by the Chief Executives of the 7 Local Authorities of the North East Local Enterprise Partnership (NELEP). This has now created a mechanism for progressing the Duty to Cooperate, a new statutory requirement that Local Planning Authorities and other public bodies have when preparing their Local Plans. This Memorandum of Understanding will also relate to Northumberland National Park Authority. (An updated version is contained in Appendix 2 of this report)
4. At the 5 December 2012 meeting the Chief Executives of the seven Local Authorities considered a position paper identifying the strategic issues for agreement. It was recognised at that meeting that further joint evidence work was currently on going covering employment housing and transport issues. That work has progressed to a stage where it is now considered timely for the group to agree the schedule of strategic land use issues.

## The Duty to Cooperate and the Local Plan Examination

5. The Duty is now firmly enshrined within the Examination process for Local Plans. Firstly, it is cited as a standalone requirement for the independent Inspector to consider. Secondly, it is embedded within the broader "tests of soundness". To be found sound, the Inspector must be satisfied that the plan is :
  - Positively prepared – based on a strategy to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so and consistent with the principles of sustainable development
  - Justified - where it is the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence
  - Effective – where the plan is deliverable and based on effective joint working on cross boundary strategic priorities.

6. Cross boundary cooperation of this nature is required at the earliest opportunity in the plan making process and is then seen as an iterative process. At the Examination, the Planning Inspectorate have made it clear that they will find a Local Plan unsound unless there is evidence that demonstrates how the above tests have been complied with such as :
  - Within reason, all bodies have been given adequate opportunity to influence the plan;
  - There have been serious discussions on the plan and implications other authorities' plans;
  - Whether any sub-regional assessments have been completed in partnership with others;
  - Whether there are assessments of need for development from adjoining authorities;
  - How would the plan's policies, proposals and infrastructure requirements affect those of other authorities (and vice versa);
  - Can identified external needs for development be accommodated within that authority area and if not how would they be met.

### **Cross Boundary Working**

7. Heads of Planning meetings across the 7 authorities have been regularly timetabled with clear terms of reference to help progress the issues likely to be considered under Duty to Cooperate. Since the October 2012 meeting, work has continued to pull together a position paper to reflect areas where common agreement has already been reached through discussion over the past 6 months.

### **Proposal to Comply with the Duty to Cooperate**

8. As the Duty relates to strategic cross-boundary issues where there is likely to be a significant impact and there needs to be an ongoing and iterative process, this should involve more than officer level meetings. It will need Chief Executive and political agreement, e.g. in relation to the duty to assess the ability of each authority to provide for any unmet development needs of a neighbouring authority.
9. Appendix 1 is the position paper for agreement.
10. The schedule should be agreed by the relevant chief executives and Leaders/ Elected mayors and each authority will need to formally sign off the Memorandum of Understanding and schedule of issues through its cabinet/executive in due course.

## **RECOMMENDATIONS**

- 14 The 7 Local Authority Chief Executives are asked to:
  - i. Agree the Appendix 1 as a position paper on strategic issues
  - li Agree this report for progression onward to leaders/Elected mayors and through their own authorities appropriate mechanisms.

## **APPENDIX ONE – POSITION STATEMENT – Spring 2013**

### **STRATEGIC ISSUES OF AGREEMENT AMONGST THE SEVEN LOCAL AUTHORITIES IN RESPECT OF THE DUTY TO CO OPERATE**

#### **Introduction**

1. This paper reflects the discussions to date on issues of strategic importance to the 7 local authorities. It covers issues where there are no major issues and highlights areas where further work is required. It will form the basis of our evidence in meeting the Duty to Cooperate
2. We need to recognise that each local authority is at a different stage in the plan preparation process, and recognise the fact that we might all be working to different base dates. Therefore this is a work in progress that will be updated as necessary and kept under review by the Heads of Planning. This current note represents the position as of May 2013.

#### **Population and Housing setting future housing requirements**

3. Methodology
4. With the revocation of the RSS (15 April 2013), authorities can set their own 'objectively assessed' housing needs using robust and up to date evidence. These requirements must be both realistic and aspirational. Government wishes to significantly boost the delivery of new housing.
5. There is no prescriptive method to calculate growth requirements. All 7 authorities have used as a baseline DCLG and ONS Population and Household Projections. Considerations can also include :
  - The robustness of evidence supporting previous RSS requirements
  - Results from up to date Strategic Housing Market Assessments
  - Economic growth scenarios
  - Strategic objectives
  - Projected changes in average household sizes (which may be applied to population projections using headship rates)
  - Migration rates
  - Viability and deliverability
  - Past build rates
  - Available land supply.
6. Using the above data sources, emerging housing requirements as detailed in emerging local plans is set out below:

**Table 1: Estimates of Future Housing Requirements May 2013**

	<b>Proposed Housing Numbers (20 years) (Net)</b>	<b>Average dwellings per annum (Net)</b>
<b>Durham</b>	30,000	1,500
<b>Gateshead</b>	10,700	535
<b>Newcastle</b>	18,670	934
<b>Northumberland</b>	14,440–24,090	722-1,205
<b>North Tyneside</b>	10,000-17,000	500 – 850
<b>South Tyneside</b>	8,720-10,720	436-536
<b>Sunderland</b>	15,000	750
<b>Total NELEP Area</b>	107,530 – 126,630	5377 - 6332

7. All 7 authorities seek to retain or encourage growth to support sustainable economic growth, maintain a proportion of economically active population, accommodate the trend of ageing population profiles and to meet objectively assessed needs. In some instances it maybe necessary to claw back economically active households from adjoining authorities
8. **Further work area:** The specific housing requirements for each authority will remain under review as new evidence emerges and development plans are progressed. Through the duty to co-operate further work will be required between the 7 local authorities within the NELEP area to consider an agreed position on housing requirements where consideration is being given to a shared distribution of housing growth.
9. The Supply of Housing Land
10. Upon examination or adoption of a Local Plan document that sets housing requirements, Local Authorities would be required to demonstrate a supply of deliverable housing land for the next five years (with a buffer of 5% or 20%<sup>1</sup>) to ensure choice and competition in the market; and that sufficient developable housing sites and capacity within broad areas will come forward for development to meet requirements for the fifteen year plan period. At adoption if a Local Plan could not demonstrate that a strategy for sufficient land to come forward for development, the plan would be at risk of being found unsound.
11. Local authorities now have to identify their own housing requirement through their Local Plans to meet objectively assessed needs. A number of authorities within the NELEP area do not currently have a a five year land supply using previous Regional Spatial Strategy set housing requirements A number of authorities do not have a sufficiently advanced Local Plan to set a revised up-to-date housing requirement. Any alternative housing requirement, identified ahead of production of a Local Plan must be suitably evidence based and independently tested if it is to provide a sound and robust basis for decision making.

<sup>1</sup> 20% applies where there is a record of persistent under delivery.

12. Designations, such as Green Belts that were discounted from earlier Strategic Housing Land Availability Assessments (SHLAA) are now increasingly being considered as potentially viable options to help deliver a 5 year housing requirements and meet 5 and 15 year land supply targets. The NPPF requires that 'viability' of delivery is a SHLAA assessment criteria, though the application of this in updating individual SHLAAs remains varied and once completed may affect the housing land supply. Each authority must plan for their own identified needs first within their local authority area. If they can not meet their need they can enter into discussions with adjoining authorities to establish whether they can accommodate the identified need.
13. **Further Work Area:** Previously, the North East Authorities agreed a standard SHLAA methodology. Revisiting this methodology would make sense to reappraise and confirm approaches regarding :
- Defining deliverable sites
  - Assessing viability
  - Setting the 5 year housing requirement
  - Handling underperformance and determining 5% and 20% buffers
14. From the range of up to date SHLAAs it is considered that there may be potential capacity for the NELEP area to meet its overall objectively assessed housing requirements. Where authorities look to develop shared approaches to housing growth, further work will be required to establish agreed positions for the specific distribution of housing between neighbouring authorities across the NELEP area to ensure that housing is provided in a sustainable and deliverable manner. There will need to be detailed cross boundary issues where housing proposals potentially share infrastructure located in neighbouring authority areas eg sewage, school and road capacity.
15. Affordable Housing
16. Plans must meet the needs for all types of housing including affordable housing. The affordable housing requirements in the 7 local authorities in the NELEP vary from 10% to 30%. The requirements are normally reviewed every 5 years. Evidence of development viability further informs the degree to which the private sector can deliver affordable housing through open market housing schemes.
17. Further Work: Agreement of any future overlapping Housing Market Areas alongside the identification of major housing growth areas could identify opportunities to meet specific based affordable housing requirements.
18. Gypsies and Travellers and Travelling Showpeople
19. Plans must evidence and identify the needs for this specific housing sector including gypsies, travellers and travelling show people.

Further Work Area: The Northumberland Gypsy and Travellers Accommodation Assessment (2008) only provides evidence for the period 2008-18 and will also require an update to cover the entire plan period. The Tyne and Wear Gypsy and Traveller Accommodation Needs Assessment (2009) only also only provides evidence for the 2008-18 period. This evidence is in the process of being updated on an individual or joint basis. It will remain important that 7 Local Authorities work on an agreed shared approach to the studies. Pending the outcome of the range of updates to the Gypsy and Traveller Accommodation Assessment, further work will be required for Local Authorities to develop an agreed approach to making sufficient provision for Gypsy and Travellers across the NELEP area.

## **Economic Growth and planning for jobs**

### **Policy Approach**

20. The A1 and A19 corridors along with the urban cores of the Tyne & Wear conurbation and Durham City remain the key employment foci for the region. Although it is also acknowledged that there are other key locations away from the Tyne and Wear urban cores. Current planning and economic growth policies and proposals protect and expand on these locations and opportunities. Additionally the new Enterprise Zone sites along the A19, North Bank of the River Tyne and at the Port of Blyth along with potential accelerated development zones, offer opportunities to boost regional growth. The NELEP has set out the vision for the area to become 'Europe's premier location for low carbon, sustainable, knowledge-based private sector-led growth and jobs.' Local Authorities across the NELEP area are committed to supporting growth and acknowledge how the labour market and supply chains are linked across the wider area, including cross-NELEP links with Tees Valley.

### **Functional Economic Areas**

21. The Economic Geography of the North East (NERIP) (2010) indicates that the North East region has a series of areas that have the characteristics of a functional economic area. In particular, they have strongly defined travel to work areas where the supply of people who are able and willing to find work live. These areas are used by local authorities to prioritise investment and to direct development in order to maximise delivery.
22. The above report indicates that these broad functional economic areas (not including the Tees Valley for the purposes of this paper) comprise:
  - The area around Berwick on Tweed;
  - The area around Alnwick and Morpeth, including South-East Northumberland and west Northumberland;
  - Newcastle, Gateshead and North Tyneside;
  - Sunderland and South Tyneside;
  - City of Durham and the A1 Corridor.;
  - A19 Corridor including Seaham and Peterlee; and

- The area around Bishop Auckland and Barnard Castle.

#### Rail, Road Freight Storage and Distribution

23. Across the region, there are five proposals for freight distribution services.
- A Green Belt release at South of Follingsby Lane, Gateshead for road freight.
  - A Green Belt release at Wardley Colliery to the East of Follingsby Park within South Tyneside for primarily rail freight.
  - Newton Park south of Newton Aycliffe, Durham for rail freight and distribution centre.
  - Turisdale, Bowburn, Durham as a road and rail freight interchange.
  - Weetslade, North Tyneside for storage and distribution

#### North East Enterprise Zone

24. The NELEP area's Enterprise Zone was initially agreed in August 2011. It is hoped to generate at over 7,000 net additional jobs in the next 10 years focusing on quality jobs and supporting infrastructure covering 115ha, capturing the benefits of the low carbon economy, with potential for a further 40ha extension. The principal locations are sites next to the A19 in Sunderland for the production of ultra low carbon vehicles and the River Tyne North Bank sites and Blyth Estuary which will support the offshore renewables, engineering, maritime and energy sectors.

#### Justification – Evidence Base

25. Official national statistics<sup>2</sup> (2012) indicate that the North East has the highest value of goods exports relative to the size of its economy. It has the highest percentage employed in the public sector and the lowest gross household income per head of the English regions. In 2009 manufacturing industries generated 14 per cent of the region's total GVA, more than any other sector in the region. The region's employment rate was the lowest in England at 66.2 per cent for Q4 2011; North Tyneside had the highest employment rate at 72.6 per cent.
26. All 7 local authorities have used economic growth modelling in their employment land studies to forecast how many jobs they would potentially need to provide job growth and how much land would be required to accommodate these jobs. They have also considered the quantity and quality of their portfolios of sites and premises to meet future demand. To ensure job forecasts are aspirational but realistic, a number of methods are utilised such as:
- Econometric growth scenarios;
  - Employment targets, linking in with population projections and migration rates;
  - Historic take-up rates; and

---

<sup>2</sup> ONS Regional Profiles - Economy - North East (including Tees Valley), May 2012

- Consultation with businesses and the commercial development industry.

## **Delivery**

27. Take-up rates of employment land across the region have been largely impacted upon by the current difficult economic climate and other macro-economic issues. However, it is worth noting that in Sunderland and South Tyneside, demand for large scale development opportunities for General industrial uses (Use Class B2) and Storage and Distribution uses (Use Class B8) associated with the automotive and advanced manufacturing sectors remains strong given the growing demands of Nissan and the adjacent Enterprise Zone designation. However, both authorities are struggling to offer sites that meet these business enquiries.
28. In the short to medium term delivering viable commercial and housing development will be difficult, particularly on regeneration sites with many constraints. In the medium to long term, it is hoped that economic recovery will help restore some equilibrium to the housing and commercial market.
29. It is hoped that the new Enterprise Zones will be a driver of delivery using a combination of financial incentives and simplified planning procedures. The financial incentives are largely applicable through enhanced capital allowances and business rate discounts to attract significant inward investment particularly amongst those companies with considerable plant and machinery requirements. The adoption of a Local Development Orders (LDO) will grant planning permission for the development specified within the Orders and consequently remove the requirement for a developer to submit an application for planning permission.

## **Transport and Infrastructure**

### **Partnership working between Local Authorities.**

30. The seven local authorities and the Integrated Transport Authority in the NELEP area worked together to draft a high level Transport Strategy for the NELEP area. The focus for this document has been on different elements to those covered within Local Transport Plans and it has enabled a strategic framework within which Local Authorities know what types of partnership are appropriate for different elements of transport strategy. Each of the LTPs acknowledges the role of the Draft NELEP Transport Strategy in fostering co-operation within their sections on Policy Context.
31. The NELEP Transport Strategy builds on transport strategy work carried out by the Tyne and Wear City Region. It sets out the role that transport plays in driving long-term economic growth for the NELEP area, ensuring it cements its status as a great place to live, work and visit. It highlights how important it is to have good cross-boundary transport links that help businesses to grow and flourish; attract investment; and enable a greater

number of people to access jobs and services. Working closely with local authorities and the private sector, the Transport Strategy focuses on making better use of existing transport infrastructure and assets. It also identifies specific policies, across all modes of travel from road to rail, sea to air, to help deliver a vision of sustainable economic growth.

32. The draft strategy identifies a number of key areas for co-operation, including:

- Alleviation of key congestion points along the A1 and A19 corridors in order to improve reliability and strengthen economic links;
- Effective lobbying on the proposed route for High Speed Rail, its delivery profile and alignment with classic rail investment;
- Improvements to the East Coast Main Line, the Durham Coast Line and regionally significant rail projects;
- Development of new international connections for Newcastle International Airport; and
- The development of new logistics opportunities for the area's ports.

### **Partnership Working with the Highways Agency**

#### *33. Pilot Route Based Strategy*

34. The North East recently secured a 'Pilot' Route Based Strategy for the A1 from Junction 62 in Durham, to the Seaton Burn Junction in Northumberland. The purpose of the route based strategy is to define the investment strategy for the network on a route by route basis. Key objectives of the strategy are to:

- Form the basis for the assessment of funding for the strategic road network (SRN) for the next spending review period;
- Set out on a route basis what will be required to meet the Government's outcome based specification;
- Address road based issues on the SRN; and
- Be a mechanism to engage with local stakeholders, such as NELEPs, Local Authorities and Highway Authorities, to bring together national and local priorities to inform what is needed for the route;

#### *35. Highways Agency Pinch Points Fund*

36. The 7 Highways Authorities in the NELEP area co-ordinated as a group and with key stakeholders to provide advice to the Highways Agency on priorities for the recently announced £220m 'pinch points fund'. The advice was developed in conjunction with the NELEP and resulted in four schemes being jointly agreed for submission to the programme. Of those four, one has subsequently been funded with another still on a list for consideration in future funding rounds.

#### *37. Tyne and Wear Meso Model*

38. The model has been developed in close co-operation with planning departments across Tyne and Wear has been developed to:
- Cover the Strategic Road Network within Tyne and Wear;
  - Incorporate both 'Weekday Morning Peak Period' and 'Weekday Evening Peak Period' demands from Automatic Number Plate Recognition data, enable further ongoing refinement;
  - Be calibrated and validated for a 2010 base year; and
  - Be used to test impacts of various proposals on the SRN, principally Local Development Framework aspirations, but also Pinch Point Programme and other interventions.

### **Local Major Schemes Devolution Process**

39. The seven local authorities and the Integrated Transport Authority in the NE LEP area meet on a monthly basis to develop a prioritised programme of local major schemes for submission to Department for Transport in July 2013. The Senior Officers' Transport Advisory Group (SOTAG) meets to:
- Provide a forum for discussion of strategic transport issues that includes representation from all seven local authorities and the ITA/PTE in the Local Enterprise Partnership area.
  - Provide effective advice to the *Local Transport Body (LTB)* on establishing a programme of local major scheme priorities for delivery beyond 2015;
  - Provide guidance to the LTB on the most effective governance and assurance framework to deliver such a programme of local major transport schemes;
40. The North East *Local Transport Body* has been proposed as part of an Assurance Framework submitted to Department for Transport and agreed by the prospective authorities' Cabinets / Delegated Decisions. The NELTB will be an unincorporated association (informal partnership). It will initially be made of two distinct types of membership: voting members and non-voting members. Voting members of the NELTB will be responsible for:
- Identifying a prioritised programme of major scheme investment within the available budget;
  - Ensuring value for money is achieved across the programme;
  - Making decisions on individual scheme approvals, investment decision making and release of funding, including scrutiny of business cases;
  - Monitoring progress of scheme delivery and spend; and
  - Actively managing the devolved budget and programme to respond to changed circumstances (scheme slippage, scheme alteration, cost increases etc).
41. The voting members of the NELTB are Durham County Council, Gateshead Metropolitan Borough Council, Newcastle City Council, North

Tyneside Council, Northumberland County Council, South Tyneside Council, Sunderland City Council, and Tyne and Wear Integrated Transport Authority. The non-voting member of the NELTB is the North East Local Enterprise Partnership. Membership of the NELTB may be subject to a wider governance review of joint working arrangements across the NELEP area. Such a review would be intended to strengthen governance arrangements, including exploring the option of forming a North East Combined Authority with a statutory basis, to provide a strong platform for further devolution of funding, powers and responsibilities.

### **Rail Devolution Process**

42. *The Rail Devolution Steering Group.*

43. This group is a sub-group of the regional Chief Executives group. This group meets monthly and helps to manage the rail devolution debate on behalf of the 7 North East and 5 Tees Valley authorities, it contains representation from the 7 local authorities in the NELEP area and outlines an example of the strategic framework enabling authorities to work together on issues of strategic importance at a 5 (Tyne and Wear), 7 (North East), or 12 (North East and Tees Valley) local authority footprint.

### **North East Smart Ticketing Initiative**

44. This programme of works is managed by Nexus on behalf of the Local Authorities in the North East and Tees Valley. The 12 Local Authorities are co-operating on smartcard technology and 'back office' transactions.

### **Urban Traffic Management Control (UTMC) and Traffic Signals**

45. The Tyne and Wear authorities work together through a shared services model to implement a UTMC system. This system acts to deliver improved transport efficiencies and to make better use of existing and future local Intelligent Transport Systems by allowing co-ordinated and proactive management of the whole network. The authorities also work in partnership to install and maintain Traffic Signals.

46.

### **Further Work Area:**

47. Development proposals within emerging Local Plans will have cross boundary impacts on transport networks. In particular proposals for housing development in north Durham/south Northumberland are likely to lead to significant increases in demand for cross boundary movement to/from Tyne and Wear.

48. It is important that the impact of additional cross-boundary movement is understood. There is a need for co-operation between authorities in identifying network improvements to accommodate increased demands for

movement. This may provide further justification for key schemes such as A1, or A19 improvements or the Leamside rail line, or the Ashington/Blyth/Tyne railway line, or require more localised enhancement of bus, cycle or road networks at other locations.

49. Metro Improvements - in partnership with Nexus:

50. **Extensions** – Work is being undertaken to investigate the feasibility of, and develop proposals for, potential extensions to the existing Metro system. These include physical extensions on light rail and on-street corridors that interchange with Metro facilities. Various routes and alignments are being considered both within the Tyne and Wear urban area and extending into surrounding Unitary authorities.

51. **Integration** – Progress further work to develop a more proactive approach to securing integration of land-use with the Metro, including informing emerging LDF documents, and identifying development options around existing and potential new Metro stations such as Park and Ride schemes.

52. **Technology** – Examinations of alternatives to existing metro-cars (such as lighter rolling stock) are being examined.

53. **Funding** – Develop a funding and delivery strategy for future Metro extensions, considering how new funding mechanisms such as tax increment financing and prudential borrowing could be used. Work is also being undertaken on the wider economic benefits of the Metro system and how these could be increased through extensions.

54. Delivering the Bus Strategy

55. The Bus Strategy Delivery Project is being undertaken to examine how to deliver the three key objectives of the Integrated Transport Authority's Bus Strategy: to arrest decline in bus patronage; to maintain (and preferably grow) network accessibility; and to deliver better value for money. It is proposed that a report is brought to the ITA in early Summer 2013 containing a comparison of options and recommendations.

56. Engagement has taken place across the 5 Tyne and Wear local authorities through an officer working group. Attendees from Northumberland and Durham have also been invited to enable cross boundary issues to be considered.

57. Strategic sites for rail freight,

58. The Rail Freight Partner Group is a subdivision of the Tyne and Wear Freight Partnership. Representative stakeholders from the rail freight industry, or with an interest in rail freight, attend twice-yearly meetings to discuss the opportunities and barriers for rail freight in the North East and particularly in Tyne and Wear. The Rail Freight Partner Group aims to grow the volume of goods moved in this region by rail where it is

environmentally and economically beneficial to do so. It seeks to provide information and promote awareness about rail freight options, and to bring together groups with a common interest in the subject. Although a subdivision of Tyne and Wear's Freight partnership, representatives are invited from Northumberland and Durham councils. – Extension of the broader freight partnership to Durham and Northumberland could assist in co-operation on freight matters – Durham and Northumberland are already invited to this.

### **North East Highways Alliance**

59. Work is ongoing to establish if there is interest and potential efficiencies that could be achieved through collaborative working in a regional highways alliance. This could potentially deliver shared services in areas such as: street lighting; structures; flooding and coastal protection; road safety training and permit schemes. Shared services may also enable neighbouring Councils to achieve economies of scale of more routine services such as highway maintenance.

### **60. Community Infrastructure Levy (CIL)**

- Review of cross boundary CIL funding for infrastructure to support growth
- Review consistency of CIL rates

### **61. Shopping, Leisure and Tourism**

- There are no major issues.

### **62. Minerals and waste**

- There are no major issues, for the 7 local authorities in the NELEP area, but further work may be required to demonstrate an agreed approach to cross border waste management to areas outwith the region. For example a number of authorities export their waste to Teeside and Cumbria.

### **63. Renewable energy**

- There are no major issues

### **64. Green Infrastructure**

- There are no major issues.

### **65. Waste water treatment**

- Review in partnership with Northumbrian Water Limited the future of Howdon and Jarrow water treatment works and issues to do with their

capacity/headroom and the infrastructure necessary to reduce the amount of surface water going into the main drains

**66. Healthcare.**

- There are no major issues.

**67. Education**

- There are no major issues

**68. Utilities**

- There are no major issues

DRAFT