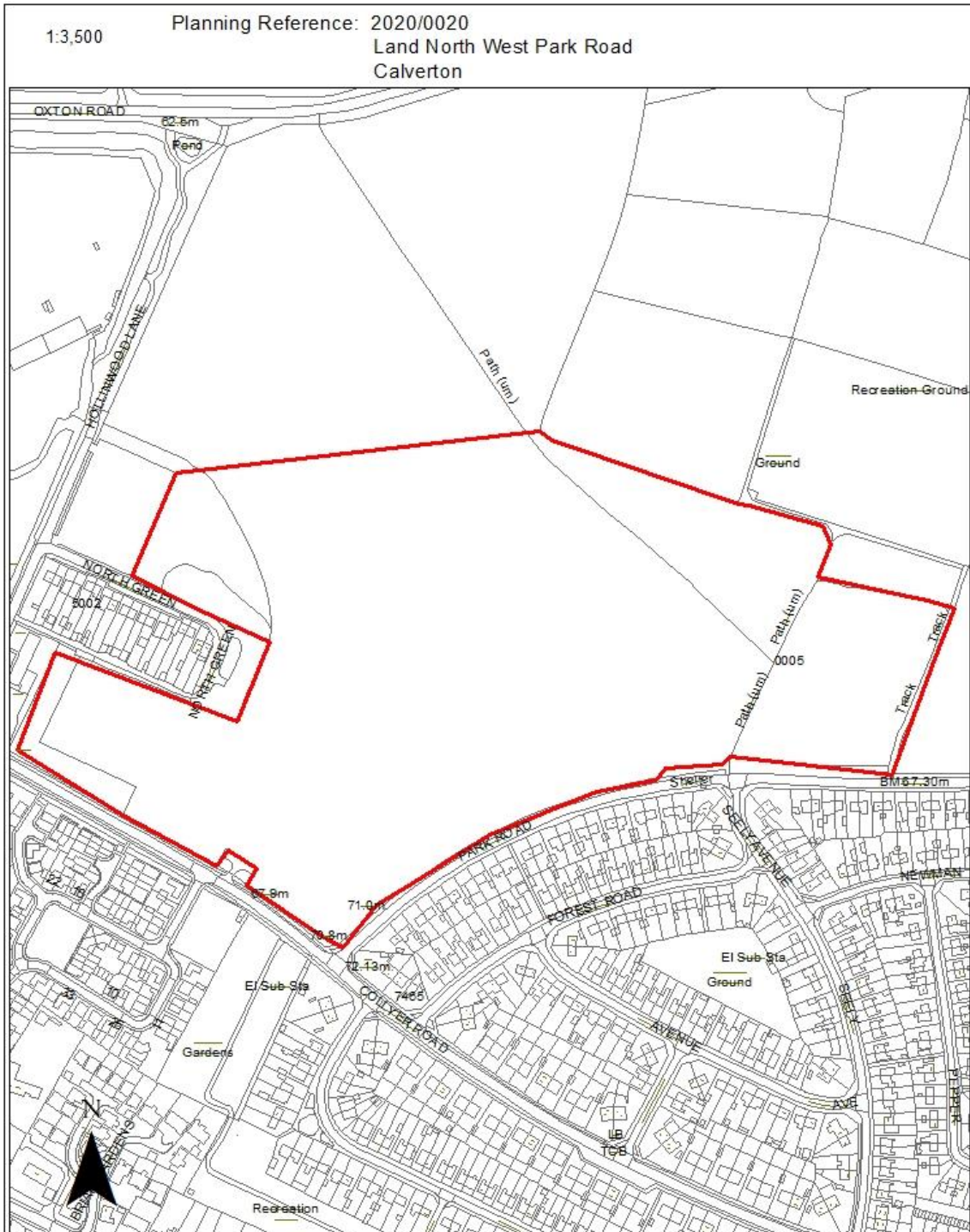




Planning Report for 2020/0020



NOTE This map is provided only for purposes of site location and should not be read as an up to date representation of the area around the site.
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Report to Planning Committee

Application Number: 2020/0020

Location: Land North West Park Road Calverton

Proposal: Application for the approval of reserved matters (layout, landscaping, scale and appearance) for the erection of 351 dwellings and associated infrastructure, pursuant to outline approval 20018/0607.

Applicant: Persimmon Homes Nottingham

Agent:

Case Officer: Nigel Byran

The application is referred to Planning Committee to comply with the Councils constitution as the development proposes more than 9 dwellings.

1.0 Site Description

- 1.1 The site is located to the north of the main built up area of the settlement of Calverton and consists mainly of agricultural land utilised for arable purposes. There is however small woodland areas situated adjacent to the western site boundary and hedgerows along the southern and eastern boundaries.
- 1.2 There are significant differences in ground level across the site with the eastern part being higher than the land to the north and the west.
- 1.3 The northern boundary is shared with open land, the eastern boundary with Calverton Village Hall and the William Lee Memorial Park. The southern boundary with Park Road and Collyer Road and the west with Calverton Miners Welfare and existing dwellings on North Green.
- 1.4 The gross site area is 13.6 hectares. There are no protected trees on the site. A footpath crosses the site, which is proposed to be diverted, as outlined below.

2.0 Relevant Planning History

2016/0499EIA – Screening Opinion for housing development. Concluded that an Environmental Impact Assessment was not required.

2018/0607 - Outline planning application for up to 365 No. dwellings with all matters reserved except access, with access served from Park Road and Collyer Road.

2020/0103 - Diversion of footpath 39 for 90m – the application was considered at the 05 August Planning Committee meeting and an Order to divert the footpath has been made and is being consulted on, but it has not yet been confirmed.

2020/0156DOC - Approval of details reserved by condition 13 (archaeology) of outline planning permission 2018/0607 – approved on the 20 March 2020.

3.0 Proposed Development

- 3.1 The application seeks reserved matters approval pursuant to outline permission 2018/0607. Matters under consideration for this reserved matters approval are, layout, scale, landscaping and appearance. The application is for the erection of 351 dwellings, 70 of which will be affordable, with a split of 49 social rent and 21 intermediate housing e.g. shared ownership; 3.39 hectares of open space will be provided along with a Local Equipped Area of Play (LEAP). The dwellings to be erected will be a mixture of two and two and a half-storeys in scale, ranging from two to four bed.
- 3.2 There are two vehicular access points proposed, one from Park Road and the other from Collyer Road, along with four small private drives from Park Road. The main access will be that from Park Road, which is proposed to be the primary road into the site at 6.75m wide with a footway on either side, which would extend to the boundary of the safe guarded land to the immediate north.

4.0 Consultations

- 4.1 Nottinghamshire County Council Highways – Following receipt of amended plans confirming details of visibility splays and turning heads etc, they raise no objection to the application subject to the imposition of conditions.
- 4.2 Nottinghamshire County Council Rights of Way Officer – note that footway 39 will need to be re-aligned to accommodate the development proposed and, whilst raising no fundamental objection to the application there would be a need to apply to vary the Public Right Of Way (PROW) and such an application is under consideration by Gedling Borough Council (2020/0103). Footway 38 runs adjacent to the site but appears to be unaffected by it. Any decision notice would need informatives adding about the need to retain PROW's free from obstruction.
- 4.3 Nottinghamshire County Council Lead Local Flood Authority - Raise no objection to the application subject to a condition requiring the approval of a

detailed drainage strategy in accordance with the Flood Risk Assessment (FRA).

- 4.4 Gedling Borough Council Housing Strategy – The affordable housing requirement is 20% of proposed dwellings to be provided on-site of which 70% will be social/affordable rent and 30% intermediate sale i.e. shared ownership. Based on a development of 351 units this would equate to 70 units affordable housing units on site. Of these, 49 are for affordable/social rent and 21 are for intermediate sale with a preference that this be shared ownership.
- 4.5 Gedling Borough Council Parks and Street Care – note the provision outlined is acceptable and the requirement for details of the Local Equipped Area of Play (LEAP) is to be approved through the Section 106 Legal Agreement.
- 4.6 Gedling Borough Council Scientific Officer – note that conditions pertinent to air quality management and contamination are attached to the outline and, therefore, raise no objection to the reserved matters application.
- 4.7 Calverton Parish Council – are concerned that there are no bungalows proposed but are pleased to see that there are no 3 or 3½-storey dwellings.
- 4.8 Members of the Public

A press notice was published and a two site notices erected, furthermore, an additional round of consultation was undertaken on amended plans received during the course of the application. In total 4 letters of objection have been received, two on the original consultation and two on the re-consultation; a summary of the objections raised are summarised below:

- Calverton does not have the infrastructure to deal with the number of dwellings proposed to be erected, notably the doctors surgery is at capacity and the town centre/shopping area has inadequate parking;
- Speeding already occurs along Park Road, this will only get worse and parked cars will block traffic, which is a bus route;
- Existing roads are in need of resurfacing;
- The integrity and character of the village will be undermined with a number of hedgerows proposed to be removed, which will harm wildlife too;
- Land ownership issues have, to a degree, been resolved but rights of way, public and private, will be impacted;
- A Masterplan has not been submitted as required by the Calverton Neighbourhood Plan;
- The main spine road leads into the safeguarded land rather than the remainder of the allocated site and it is questionable whether the main spine road, which is likely to be a bus route, can access Oxton Road without going onto land not in the ownership of the applicant;
- A comprehensive form of development should be considered alongside the remaining allocated and safeguarded land to ensure the development is the best it can be.

5.0 Assessment of Planning Considerations

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that ‘if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise’.

6.0 Development Plan Policies

6.1 The following policies are relevant to the application:

6.2 National Planning Policy Framework 2019 (NPPF)

The most relevant national planning policy guidance in the determination of this application is contained within the National Planning Policy Framework 2019 (NPPF) and the additional guidance provided in the National Planning Practice Guidance (NPPG). Sections 5 (Delivering a sufficient supply of homes), 11 (Making effective use of land) and 12 (Achieving well-designed places) are particularly relevant.

6.3 Greater Nottingham Aligned Core Strategy (ACS) Part 1 Local Plan

Policy A: Presumption in Favour of Sustainable Development – a positive approach will be taken when considering development proposals

Policy 1: Climate Change – all development will be expected to mitigate against and adapt to climate change including with respect to flood risk.

Policy 2: The Spatial Strategy – states that sustainable development will be achieved through a strategy of urban concentration with regeneration.

Policy 8: Housing Size, Mix and Choice – sets out the objectives for delivering new housing.

Policy 10: Design and Enhancing Local Identity – sets out the criteria that development will need to meet with respect to design considerations.

Policy 11: Historic Environment – sets out the criteria for assessing applications affecting the historic environmental and heritage assets and their settings.

Policy 17: Biodiversity – sets out the approach to ecological interests.

Policy 19: Developer Contributions – set out the criteria for requiring planning obligations.

6.4 Local Planning Document (Part 2 Local Plan)

The Local Planning Authority adopted the Local Planning Document (LPD) on the 18th July 2018. The relevant policies to the determination of this application are as follows:

LPD 4: Surface Water Management – sets out the approach to surface water management.

LPD 7: Contaminated Land – sets out the approach to land that is potentially contaminated.

LPD 11: Air Quality – states that planning permission will not be granted for development that has the potential to adversely impact upon air quality unless measures to mitigate or offset have been incorporated.

LPD 18 Protecting and Enhancing Biodiversity – sets out that proposals should be supported by an up to date ecological assessment. Any harmful impact should be avoided through design, layout and mitigation or compensation. Where possible, development proposals will be expected to take opportunities to incorporate biodiversity in and around the development and contribute to the establishment of green infrastructure.

LPD 19: Landscape Character and Visual Impact – states that planning permission will be granted where new development does not result in a significant adverse visual impact or a significant adverse impact on the character of the landscape.

LPD 21: Provision of New Open Space – sets out that there will be a requirement for public open space on sites of 0.4 hectares in area and above, which could be on-site or off-site.

LPD30: Archaeology – sets out the measures to protect sites with archaeological potential.

LPD 32: Amenity – planning permission will be granted for proposals that do not have a significant adverse impact on the amenity of nearby residents or occupiers.

LPD 33: Residential Density – states that planning permission will not be granted for proposals of less than 30 dwellings per hectare unless there is convincing evidence of a need for a different figure.

LPD 35: Safe, Accessible and Inclusive Development – sets out a number of design criteria that development should meet, including in relation to the massing, scale and proportion of development.

LPD 36: Affordable Housing – sets out that a 20% affordable housing provision will be required in Calverton but that a lower requirement may be justified provided there is sufficient evidence which takes account of all potential contributions from grant funding sources and a viability assessment has been undertaken by the Council which demonstrates this.

LPD 37: Housing Type, Size and Tenure – states that planning permission will be granted for residential development that provides for an appropriate mix of housing.

LPD 48: Local Labour Agreements – sets out the thresholds where a Local Labour Agreement will be required.

LPD 57: Parking Standards – sets out the requirements for parking.

LPD 61: Highway Safety – states that planning permission will be granted for developments that do not have a detrimental impact upon highway safety, movement and access needs.

LPD 66: Housing Allocations– identifies the application site as housing allocation H16, for approximately 390 new dwellings.

6.5 Calverton Neighbourhood Plan (CNP)

The Calverton Neighbourhood Plan was adopted by Gedling Borough Council on 31 January 2018. As such the Calverton Neighbourhood Plan forms part of the Development Plan for Gedling Borough.

Policy G1: Comprehensive Development – Sets out that proposals for residential development in the North Western Quadrant Urban Extension will only be permitted where it is accompanied by an overall masterplan illustrating a high quality residential environment; highway access links including to/from the existing village road network and the feasibility of links to/from the B6386 Oxtun Road; off-site highway improvements; footpath and cycle links into the village; open spaces and structural landscaping; retention of open frontages between development and North Green and Park Road; interrelationship between the new development and the Community Hall & Sports Pavilion and William Lee Memorial Park; Housing mix; ecological corridors and health impact assessment.

Policy G2: Developer Contributions – sets out that developer contributions will be sought towards education provision (nursery, primary, secondary, 16-18), primary GP healthcare provision and village centre environmental improvements.

Policy G5: Housing Mix – states that development should include a mix of dwelling sizes, that planning permission will be granted for developments which provide bungalow and other types of accommodation for elderly and disabled people, that proposals for major development that do not include a mix of dwelling sizes and tenures and accommodation suitable for elderly and disabled people will be refused, that on all major development schemes, planning permission will be granted for the provision of plots for self-build subject to other policies in the development plan and that affordable housing should be designed and delivered to be indistinguishable from market housing and should be distributed throughout the development as a whole.

Policy ISF1: Sustainable Transport – states that opportunities for the use of sustainable modes of transport must be maximised.

Policy ISF2: Car Parking – states that any new development outside of the Village Centre will only be permitted where it has sufficient parking provision.

Policy ISF3 – Highway Impact – sets out the criteria for assessing highway impact.

Policy ISF4: Infrastructure Provision – states that residential developments will be required to provide the necessary infrastructure, such as education provision, healthcare provision, open space and drainage provision.

Policy BE1: Design & Landscaping – states that all development on the edge of Calverton must provide soft landscaping on the approach into the village and sets out criteria to achieve this.

Policy BE2: Local Distinctiveness and Aesthetics – states that development should be designed to a high quality that reinforces local distinctiveness including that buildings on the fringes of major developments should have variations in height, style and position.

Policy BE3: Public Realm – sets out the approach to the public realm and to landscaping.

Policy BE4: Parking Provision – sets out that adequate parking must be provided.

Policy BE5: Heritage Assets – sets out that development proposals should take account of their effect on Ancient Monument and their setting within Calverton and non-designated sites with potential archaeological interest.

Policy NE3: Flooding- sets out the approach to preventing flooding and to ensure that adequate drainage is provided.

Policy NE4: Green Infrastructure –sets out the approach to green infrastructure and ecological considerations.

Policy NE5: Biodiversity – sets out the approach to biodiversity.

6.6 Other

Parking Provision for Residential Developments – Supplementary Planning Document 2012– sets out the car parking requirements for new residential development.

Open Space Provision SPG (2001) – sets out the open space requirements for new residential development.

Affordable Housing SPD (2009) – sets out the affordable housing requirements for new residential development.

7.0 **Planning Considerations**

Principle of the development

- 7.1 The site is allocated as a housing site, H16, under Policy LPD 66 of the Local Planning Document, which was adopted in July 2018. Policy LPD 66 identifies the site as providing approximately 390 dwellings and therefore the principle of residential development on this site is established, although it should be noted that it does not include all of the H16 land; elements to the west and north are not included within this application and are understood to be under different ownership. Furthermore, the proposal is a reserved matters application and, therefore, the site benefits from outline permission.
- 7.2 The Calverton Neighbourhood Plan (CNP) also identifies the wider area between Park Road and Oxton Road as being the location for the North East Quadrant Urban Extension Site. Policy G1 of the CNP is considered to be most pertinent to the determination of the application, which outlines 10 criteria that need to be considered, outlined in paragraph 6.5 of this report.
- 7.3 The layout accords with the indicative layout and masterplan that was submitted with the outline application. Information with regard to how the site will interact with future phases of the allocated land and safeguarded land is limited save for it being identified that the main access road will lead into safeguarded land, which is, in the longer term, likely to be utilised by a bus route, and, ultimately, link to Oxton Road, and there is the possibility for vehicular access to the remainder of the allocated land to the north. This first phase of development will provide a broad design ethos that later phases will need to follow and final agreement over the internal highway layout will be progressed through later phases of the development and need to comply with policy G1. The Design and Access Statement submitted in support of this application addresses policy G1 of the CNP.
- 7.4 Having regard to the above it is apparent that the site is allocated for residential development, benefits from outline planning permission (ref: 2018/0607) and, therefore, the principle of residential development is supported and deemed to comply with policies LPD66 and G1 of the CNP.

Layout, scale and appearance

- 7.5 The site area is 13.6 hectares and the number of dwellings to be erected, 351, would be below the 365 maximum referred to in the outline permission, which gives a density of 25.8 dwellings per hectare. Policy LPD 33 states that development in Calverton should be of a minimum density of 25 dwellings per hectare, so the proposed development would meet with this requirement and whilst toward the lower end of the threshold, this is considered to be appropriate given the edge of settlement location.
- 7.6 The layout has taken into account the Neighbourhood Plan in that it provides open space adjacent to existing properties on North Green. Furthermore, the broad principles of good design are considered to be followed in that the main areas of open space are overlooked, the development is largely outward facing and there are focal buildings at key nodes. A number of 'double fronted' properties are also proposed on corner plots to ensure that blank gables are not on prominent corners and frontages are, where possible, active and overlooked. The affordable housing has been spaced out in small groups

to allow their management without having large groupings, which is acceptable in both social and design terms.

- 7.7 With regard to scale, all of the dwellings will either be two-storey or two and a-half in scale; the larger properties are typically located at focal points within the site e.g. view termination. No bungalows are to be provided but there will be an acceptable mix of properties ranging from 2 to 4 bedrooms, with a mixture of tenures too. Furthermore, no specialist housing, bungalows or self-build units will be provided but it is still considered that the mix of dwellings would be appropriate for a wide range of socially diverse occupants and, on balance, the mix and tenure of properties is considered to be acceptable and comply with policy G5 of the CNP and LPD37.
- 7.8 A materials schedule has been provided and identifies a mixture of red and buff brick properties, with red brick predominate. The front elevation of some properties will have render focal point and tiles will largely be mixture of red and darker colours, with red predominate. The materials as identified are acceptable and will respect the character of the area having regard to materials utilised on existing properties on Park Road, although samples would need to be provided for final approval.
- 7.9 In respect of affordable housing provision, the requisite number of dwellings required by the outline permission have been provided, along with the requisite mix sought by Housing Strategy e.g. 49 affordable/social rent and 21 intermediate sale. The dwellings are also appropriately spread across the site. The application is, therefore, deemed to comply with LPD36.
- 7.10 A total of 20 housetypes are proposed with 51 2-bed, 158 3-bed and 142 4-bed properties. There will be a mixture of integral garages, detached garages as well as some frontage parking. The elevation treatments of the dwellings are typical of dwellings of this size and it is the key features of detailing around the windows and doors, some of which will have brick cills and others stone, which will create visual diversity within the buildings. As noted above, some will have render focal points and a number will have porches to break up the front aspect. Furthermore, some of the dwellings have been specifically designed and sited for their context e.g. double fronted dwellings. The external appearance of the dwellings will respect the character of the area and be reflective of others dwellings recently constructed in the area, including along Flatts Lane. As a result the overall layout, scale and appearance of the development is deemed to comply with policy ASC10 of the aligned core strategy, policy BE1 of the CNP and guidance within the NPPF.

Landscaping

- 7.11 A detailed landscaping scheme and Arboricultural Method Statement (AMS) have been submitted in support of the application. None of the trees in the application site are subject of a tree preservation order and given that the site is largely arably farmed the main features of interest are to the site periphery, which are to be largely retained. Notably a large section of hedgerow is to be removed along the southern boundary of the application site fronting Park Road, to allow a 2m footway along this boundary; however, replacement

planting is proposed to try and replicate this green frontage. The vast majority of existing vegetation, save for holes to create access to the site and removal of some trees and hedges, notably toward the western edge of the site (identified as G11 in the AMS) is to be retained.

- 7.12 Within the main section of the site the landscaping details are largely domestic in form but with sporadic trees in frontages to break the built form and create its own green character. Furthermore, mature trees to the periphery of the site are to be retained which will create a degree of maturity to the landscaping scheme, whilst other aspects will take time to mature.
- 7.13 Overall, the landscaping scheme has, where possible, utilised existing vegetation and looked to replace features that need to be removed. Within the main residential areas additional planting is also proposed to break up the built form and the Public Open Space will be largely grassed with trees interspersed. Having regard to the above it is considered that the landscaping scheme is acceptable and complies with policy LPD18 and guidance within the NPPF.

Other considerations

- 7.14 For the avoidance of doubt, there are a number of other topics that were covered when the outline application was determined. Notably, a Section 106 Legal Agreement secured contributions toward affordable housing, health care, education, bus service and bus stop improvements, a local labour agreement and maintenance of the Public Open Space. This should mitigate infrastructure concerns relating to this development. Other matters covered by condition on the outline permission include archaeology, drainage, possible contamination and a Construction Method Statement. It should be noted that the Lead Flood Authority have requested an additional condition with regard to drainage but this is covered by condition 5 of the outline permission so an informative will, instead, be added to any decision notice.
- 7.15 With regard to residential amenity it is noted that the site is largely self-contained and the impact on properties on the opposite side of Park Road is likely to be minimal in that dwellings will have adequate separation distances over a relatively main road. Internally, the layout has been designed to ensure that any potential overlooking is kept to a minimum with rear gardens in the region of 10m in depth. Therefore, it is considered that the impact on the amenity is acceptable and complies with policy LPD32.
- 7.16 Each dwelling will have off street parking provision and conditions are proposed to be added to the decision notice to ensure that the identified provision is provided. The Highway Authority raise no objection to the level of provision provided, which is considered to be acceptable and policy compliant. With respect to public transport to serve the site, a contribution to do this has been secured through contributions in the Section 106 legal agreement attached to the outline permission. The final path of any bus route is likely to be determined should the remainder of the safeguarded land come forward for development, which is not yet currently known, although it is not considered that this application would preclude such provision.

7.17 There are public rights of way in the area, including one that is proposed to be diverted under application 2019/0103, but the development will not fundamentally alter the right of way or ability of members of the public to access adjacent land. The grant of this reserved matters would not override the public right of way over Calverton Footpath No. 39 and the footpath would need to be diverted under other legislation. The Council made a footpath diversion order ("Order") on 6th August 2020 which is currently being consulted on. If members resolve to approve this reserved matters application and there are no objections to the Order the Council will confirm the Order and the footpath will be diverted in accordance with the terms of the Order.

8.0 Conclusion

8.1 The principle of the development has been established following the grant of outline application 2018/0607 and fact that the site is allocated for residential development in the Local Planning Document. Access has already been approved with the internal access arrangements also now considered to be acceptable. The density of development is acceptable and the layout considered to respect the character of the area. The design of the dwellings is acceptable with a mixture of materials and scale of properties, with public open space overlooked and residential amenity respected. Having regard to the above it is considered that the application complies with policies A, 1, 2, 8, 10, 17 and 19 of the Aligned Core Strategy; policies 4, 7, 11, 18, 19, 21, 30, 32, 33, 35, 36, 37, 48, 57, 61 and 66 of the Local Planning Document; policies G1, G2, G5, ISF1, ISF2, ISF3, ISF4, BE1, BE2, BE3, BE4, NE3, NE4 and NE5 of the Calverton Neighbourhood Plan and guidance within the NPPF.

Recommendation: to grant reserved matters approval, subject to the imposition of conditions, as set out in the report:

1. This permission shall be read in accordance with the application form and following list of approved drawings:

Affordable Housing Plan CA-PL-02 rev E
Location Plan CA-PL-01 rev A
Public Right of Way CA-PL-03 rev B
Planning Layout CA-PL-05 rev D
Charter Plan CA-PL-04 rev D
LEAP Proposals 7403-L-22 rev A
Planting Plan 7403-L-21 rev E
Alnwick Brick Plans and Elevations 638-PL-01
Hanbury Brick Plans and Elevations 761-PL-01
Rufford Brick Plans and Elevations 870-PL-01
Chatsworth Brick Plans and Elevations 918-PL-01
Souter Brick Plans and Elevations 951-PL-01
Souter Render Plans and Elevations 951-PL-02
Sutton Brick Plans and Elevations 987-PL-01
Sutton Render Brick Plans and Elevations 987-PL-02
Hatfield Brick Plans and Elevations 969-PL-01
Hatfield Render Plans and Elevations 969-PL-02

Hatfield Cr Brick Plans and Elevations 969-PL-03
Hatfield Cr Render Plans and Elevations 969-PL-04
Clayton Cr Brick Plans and Elevations 999-PL-01
Clayton Cr Render Plans and Elevations 999-PL-02
Roseberry Brick Plans and Elevations 1096-PL-01
Roseberry Render Plans and Elevations 1096-PL-02
Leicester Brick Plans and Elevations 1187-PL-01
Leicester Render Plans and Elevations 1187-PL-02
Lumley Brick Plans and Elevations 1120-PL-01
Lumley Render Plans and Elevations 1120-PL-02
Chedworth Brick Plans and Elevations 1222-PL-01
Chedworth Render Plans and Elevations 1222-PL-02
Chedworth (Bay F) Plans and Elevations 1222-PL-03
Chedworth (Bay S) Plans and Elevations 1222-PL-04
Winster Brick Plans and Elevations 1275-PL-01
Winster Render Plans and Elevations 1275-PL-02
Corfe Brick Plans and Elevations 1415-PL-01
Corfe Render Plans and Elevations 1415-PL-02
Corfe Bay Plans and Elevations 1415-PL-03
Kendal Brick Plans and Elevations 1190-PL-01
Kendal Render Plans and Elevations 1190-PL-02
Standard Garages Single/Double Garage STDGD-02

The development shall thereafter be undertaken in accordance with these plans/details.

2. No part of the development hereby permitted shall be brought into use until all drives and parking areas are surfaced in a bound material (not loose gravel). The surfaced drives and parking areas shall then be maintained in such bound material for the life of the development.
3. No part of the development hereby permitted shall be brought into use until the access driveways and parking areas are constructed with provision to prevent the unregulated discharge of surface water from the driveways and parking areas to the public highway. The provision to prevent the unregulated discharge of surface water to the public highway shall then be retained for the life of the development.
4. The landscaping scheme as approved shall be carried out in the first planting season following the completion of the development. Any trees, shrubs or plants that die within a period of five years from the completion of the development, or are removed and/or become seriously damaged or diseased in that period, shall be replaced (and if necessary continue to be replaced) in the first available planting season with others of similar size and species.
5. No above ground works shall commence until samples of external facing and roofing materials have been submitted to and approved in writing by the Local Planning Authority. Development shall thereafter be carried out in accordance with the approved details.

Reasons

1. For the avoidance of doubt.
2. To reduce the possibility of deleterious material being deposited on the public highway (loose stones etc) and to comply with policy LPD61.
3. To ensure surface water from the site is not deposited on the public highway causing dangers to road users and to comply with policy LPD61.
4. To ensure that the development assimilate within the green environment and to comply with guidance within the NPPF.
5. To ensure that the character of the area is respected and to comply with policy ACS10 of the Aligned Core Strategy.