



Planning Committee

Application Address	95 Charminster Avenue Bournemouth BH9 1RU
Proposal	Alterations, loft conversion to include dormer window and roof light and change of use from single dwellinghouse (Use Class C3) to 8-person House in Multiple Occupation (Sui Generis)
Application Number	P/25/03627/FUL
Applicant	Mr Kyle Lloyd
Agent	Mr Daniel Wilden Pure Town Planning Studi 2 The Focus Building 1 Crimea Road Bournemouth BH9 1AP
Ward and Ward Member(s)	Moordown Cllr Joe Salmon Cllr Kate Salmon
Report Status	Public
Meeting Date	20 November 2025
Summary of Recommendation	Grant in accordance with the details set out below for the reasons as set out in the report
Reason for Referral to Planning Committee	Over 20 comments received contrary to decision
Case Officer	Laura Sims
Is the proposal EIA Development?	No

Description of Proposal

1. Permission is sought for alterations, loft conversion to include dormer window and roof light and change of use from single dwellinghouse (Use Class C3) to 8-person House in Multiple Occupation (Sui Generis).

Description of Site and Surroundings

2. The proposed site is a detached two storey dwelling set on the corner of Charminster Avenue and Malvern Road. The site benefits from a single storey rear extension which was granted permission under 7-2024-29293-(TPD), the site is very open with no boundary treatment to the front, side or rear.
3. The setting of the site is varied, opposite the dwelling to the west is a small parade of shops with residential units at first floor level, to the North is the St Walburga's Catholic Primary School. Dwellings to Malvern Road are primarily detached two storey with some variety in design, whilst Charminster Avenue is characterised by detached two storey dwellings of similar design to Number 95.
4. The area is characterised by a mixture of detached two storey dwellinghouses and bungalows.

Relevant Planning History:

5. 7-2024-29293-(TPD) - 95 Charminster Avenue, Bournemouth, BH9 1RU - Prior notification procedure – The erection of a single storey rear extension which would extend beyond the rear wall of the original house by 8m, for which the maximum height would be 3.5m, and for which the height of the eaves would be 2.5m. – Granted - 07/10/24
6. P/25/03627/FUL – 95 Charminster Avenue, Bournemouth, BH9 1RU - Conversion of existing property to 4 Flats including roof extension to provide 2nd Floor Flat. – Refused as the alterations created an out of character and over dominant dwelling, insufficient parking and BNG information – 11/07/2025

Constraints

7. None.

Public Sector Equalities Duty

8. In accordance with section 149 Equality Act 2010, in considering this proposal due regard has been had to the need to —
 - eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Other relevant duties

9. In accordance with regulation 9(3) of the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitat Regulations), for the purposes of this application, appropriate regard has been had to the relevant Directives (as defined in the Habitats Regulations) in so far as they may be affected by the determination.
10. With regard to sections 28G and 28I (where relevant) of the Wildlife and Countryside Act 1981, to the extent consistent with the proper exercise of the function of determining this application and that this application is likely to affect the flora, fauna or geological or physiographical features by reason of which a site is of special scientific interest, the duty to take reasonable steps to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest.
11. For the purposes of section 40 Natural Environment and Rural Communities Act 2006, in assessing this application, consideration has been given as to any appropriate action to further the "general biodiversity objective".
12. For the purposes of this application, in accordance with section 17 Crime and Disorder Act 1998, due regard has been had to, including the need to do all that can reasonably be done to prevent, (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); (b) the misuse of drugs, alcohol and other substances in its area; and (c) re-offending in its area.
13. For the purposes of this report regard has been had to the Human Rights Act 1998, the Human Rights Convention and relevant related issues of proportionality.

Consultations

14. Highways – no objection subject to condition
15. Waste and Recycling – No objection
16. Natural England – No response

Representations

17. Site notices were posted within the vicinity of the site on 24/09/2025 with an expiry date of 15/10/2025.
18. 91 comments were received. 90 raising objections, 1 supporting the application. The objections raised were as follows:
 - Increase in parking (61 comments)
 - Safeguarding concerns for vulnerable neighbours and school children (57 comments)
 - Increase in traffic and congestion (49 comments)
 - Out of character change of use to the area (40 comments)
 - Disturbance, noise and anti-social behaviour (19 comments)
 - Overdevelopment and intensification to site (16 comments)
 - Overall amenity concerns (12 comments)
 - Overlooking (6 comments)
 - Poor design (5 comments)
 - Harm to biodiversity (1 comment)
19. One comment in support of the scheme was received stating the following:
 - High quality conversion

- Meets HMO standards and National Space Standards
- Positive contribution to neighbourhood

Key Issue(s)

20. The key issues involved with this proposal are:

- Principle of the HMO use
- Impact on character and appearance of the area
- Impact on residential amenity
- Impact on future living conditions
- Impact on highways
- Biodiversity
- Heathlands
- New Forest SAMMs

21. These issues will be considered along with other matters relevant to this proposal below.

Policy context

22. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan for an area, except where material considerations indicate otherwise. The development plan in this case comprises the Bournemouth Core Strategy and District Wide Local Plan.

Core Strategy (2012)

CS1 - Presumption in favour of sustainable development
 CS16 - Parking Standards
 CS18 - Increasing Opportunities for Cycling and Walking
 CS19 - Protecting Small Family Dwellinghouses
 CS21 - Housing Distribution Across Bournemouth
 CS24 - Houses of Multiple Occupation
 CS41 - Quality Design

District Wide Local Plan (2002)

6.13 Flat Conversions - Location of Property
 6.16 Flat Conversions - Car Parking

Supplementary Planning Documents:

Affordable Housing - SPD
 Dorset Heathlands Planning Framework SPD 2015
 Residential Extensions: A Design Guide 2008 (Advice note)
 Parking Standards SPD (adopted January 2021) (Supplementary planning document)

23. National Planning Policy Framework

Section 2 – Achieving Sustainable Development
 Section 12 – Achieving well-designed and beautiful places

Paragraph 11 –
 “Plans and decisions should apply a presumption in favour of sustainable development.

.....

For decision-taking this means:

- (c) approving development proposals that accord with an up-to-date development plan without delay; or
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

Planning Assessment

Presumption in favour of sustainable development

- 24. At the heart of the NPPF is the presumption in favour of sustainable development. NPPF paragraph 11 states that in the case of decision making, the presumption in favour of sustainable development means that where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, planning permission should be granted unless policies in the Framework that protect areas of assets of particular importance provide a clear reason for refusing the development proposals or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
- 25. Footnote 8 of paragraph 11 provides that in the case of applications involving the provision of housing, relevant policies are out of date if the local planning authority is (i) unable to demonstrate a five-year supply of deliverable housing sites or (ii) where the Housing Delivery Test (HDT) result is less than 75% of the housing requirement over the previous three years.
- 26. The NPPF (2024) paragraph 78 requires local planning authorities to identify and update a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. Paragraph 78 goes on to state that the supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where the Housing Delivery Test indicates delivery has fallen below the local planning authority's housing requirement over the previous three years, a buffer should be included as set out in paragraph 79 of the NPPF.
- 27. As of 1 April 2024 BCP Council had a housing land supply of **2.1** years against a 5-year housing requirement that includes a 20% buffer. For the purposes of paragraph 11 of the NPPF, it is therefore appropriate to regard relevant housing policies as out of date as the local planning authority is unable to demonstrate a five-year supply of homes.
- 28. In this instance, the scheme would not be considered to provide additional dwellings that would contribute towards the Council's housing delivery target. However the change of use to a HMO would contribute towards the range of housing need and type within the area.

Principle of the HMO use

- 29. A change of use is sought from a residential dwellinghouse to a Sui Generis HMO. Concern has been raised regarding the loss of a small family dwelling, Policy CS19 states that a house or bungalow with an original gross external floorspace of less than 140m² should be retained to ensure there is a balanced stock of housing across the Borough. Number 95 Charminster Avenue has an external area of 146m², excluding the extension, and therefore would not be considered a small family dwelling.

30. Policy CS24 of the Bournemouth Core Strategy Plan refers to Houses in Multiple Occupation. Saved Policy 6.17 of the District Wide local Plan 2002 (DWLP) has been engaged with this proposal as this is aimed at larger (Sui Generis) HMO uses.
31. Policy 6.17 states that for the conversion of existing properties, dwellings should be a “*substantial detached building which at present provides a minimum of seven habitable rooms, a kitchen and adequate bathroom and toilet facilities*”, the existing property meets this requirement. Additionally, the proposal would provide garden space to the front and rear of the site for residential use. As such the principle of the change in use would be considered as in line with Policy 6.17.
32. Policy CS24 states that the change in use of Class C3 to an HMO will only be permitted where no more than 10% of dwellings in the area adjacent to the application property are within Use Class C4 or larger ‘Sui Generis’ HMO use. This seeks to ensure the HMO’s do not impact negatively on the character and appearance of an area and the residential amenity of existing local residents through the creation of high concentrations levels of this type of development.
33. In light of these policies an assessment of the existing numbers of HMO uses has taken place, which involves using a data base of registered HMO uses, examining Council Tax exemptions for student housing, and other data, as well as a site visit to the area. This assessment determines if there are a high number of HMO uses in the locality. Assessing the proposal in line with the policy identifies one property within 100m of the application site on the streets that form part of the policy requirement. The adjacent roads include:-
 - Charminster Avenue
 - Ripon Road
 - Malvern Road
 - Beatty Road
 - Camden Close
34. In this particular case the area generally contains traditional family sized houses and is not within the catchment area typically associated with university students and HMO properties. Reference to available records and the HMO catchment map identifies that the number of known HMOs dwellings in the catchment area is 1 out of 61 properties in the 100m search area. This equates to 1.6% of the properties in the search policy being in use as an HMO. When this proposal is added to the equation it results in only 3.2% of the properties being in use as a HMO, which is well below the 10% threshold requirement set out in policy CS24 of the Core Strategy. In this regard compliance with CS24 is achieved.

Impact on character and appearance of the area

35. The proposal would include a small, pitched roof dormer to the front elevation as well as the erection of a bin store along the southern elevation and cycle store to the rear boundary. Additionally, a high-level window will be introduced to the single storey extension, side access to the dwelling and patio doors to the front elevation. As previously aforementioned the approved rear single storey extension has been fully erected, all landscaping has also been removed to the site. All alterations are modest in size and are considered in keeping with the surrounding area.
36. It is recognised that the change of use as a larger 8-bedroom HMO could result in an intensification of use to the property. However, the function of the site would remain as residential and is not considered demonstrably different to that of a C3 dwellinghouses. Given it has been demonstrated there would not be an overconcentration of HMO uses in this area and the similarity in terms of use between a C3 dwellinghouse and an HMO the application is considered to safeguard the character and appearance of the area in accordance with the aims CS24 and CS41 of the Core Strategy and 6.17 of the District Wide Local Plan.

Impact on neighbouring properties

37. One ground floor high window and door would be introduced to the side elevation facing Number 93 Charminster Avenue. This would not afford any harmful views into the amenity space of this neighbour. The front elevation dormer and rear skylight would look towards the front garden of Number 157 Malvern Road and parade of shops. Neither would significantly increase the level of overlooking and would not harm residential amenities. Concern was raised by objectors due to

overlooking towards the school and the safety of the children. The site is an existing dwelling with 6 windows facing on to the school, this would increase to 7 with one additional window to the approved extension. To the closest side elevation of the school there is a separation distance of 20 metres which would be retained therefore overlooking would not be considered as adversely harmful.

38. An overconcentration of HMO uses within a locality can result in a cumulative and materially harmful impact on nearby residential amenity, hence the 10% threshold set out in policy CS24 of the Core Strategy. Taking into account the proposed HMO results in a concentration level of only 3.2% of properties being in HMO use which is well below the 10% threshold set out in policy CS 24 of the Core Strategy. Given the small concentration levels in the search area and the modest intensification of use of the property from a C3 dwellinghouse to a modest sui generis HMO it is considered that the proposals will safeguard existing nearby residential amenity in accordance with the aims of policies CS24 and 41 of the Core Strategy and policy 6.17 of the District Wide Local Plan.

Impact on future living conditions

39. This scheme proposes 8 bedrooms with one person per room occupancy levels that has been specified. All rooms are above the national minimum standard size for HMO use. The following make up of rooms would be offered: -
- Ground Floor: Three bedrooms with ensembles (16.9m², 14m² and 10.2m²), one living room/kitchen space and one utility
 - First Floor: Four bedrooms (10.8m², 7m², 8.4m² and 13.7m²) all with ensembles.
 - Second Floor: One bedroom (11.9m² with headroom 1.5m or higher) both with an ensuite.
40. All habitable rooms would have clear outlooks and daylight.

Impact on highways

41. The proposal has provided one off road parking space and a cycle store to the rear of the site. In accordance with the BCP Parking Standards SPD (2021), the proposed development site is located within parking zone D. As per Table 30 of the SPD, a large HMO (Sui Generis) requires one car parking space to be provided. Consequently, the provision of one car parking space at the rear of the site satisfies the required standard.
42. The parking area is of adequate size to accommodate an SPD compliant space including an adequate buffer to the either side, and to the rear. The pedestrian inter-visibility splays are an important feature in this location owing to significant pedestrian use of the footway fronting the site, mostly generated by the adjacent school. To ensure the required level of inter-visibility is preserved, a build-out or similar is needed to prevent cars from being driven within the splay area as this would result in reduced visibility when exiting the site although any design will need to account for access with a cycle also.
43. The existing vehicular crossover (dropped kerb) will need to be extended to align with parking space to ensure no diagonal vehicle movements across the footway and to preserve visibility. New residential development generates a cycle parking requirement of one space/bed which equates to 8 spaces for the proposed HMO. The required level of cycle parking can be provided in an SPD compliant 'stand' arrangement within the cycle store, proposed to the rear of the car parking space. The position of the parking space coupled with some type of physical segregation to the splay area will ensure unfettered access to and from the public highway with a cycle.
44. Overall the proposal would comply with Policy CS16 and Parking Standards SPD subject to the implemented conditions.

Waste and Recycling

45. A House of Multiple Occupancy would be issued with a standard household allocation of 1 x 180 litre refuse bin, 1 x 240 litre recycling bin, and 1 x 23 litre capacity bin for food waste. Larger HMOs with 5 or more people living in them may also apply and pay for additional bins (1 x 180 litre refuse bin and 1 x 240 litre recycling bin and 1 x 23 litre food waste bin).
46. If the HMO generates more waste than the standard and the additional allowance, the landlord/managing agent must either arrange for the removal of the waste themselves, or pay a registered waste carrier to do so. The landlord would need a waste carrier's licence to remove the waste themselves and pay for waste disposal at a licenced facility such as our household recycling centres.
47. An occupant of the dwelling will need to ensure the bins are presented for collection at the kerbside and returned to the property boundary following emptying

Biodiversity

48. The NPPF at chapter 15 'conserving and enhancing the natural environment' sets out government views on minimising the impacts on biodiversity, providing net gains where possible and contributing to halt the overall decline in biodiversity. The Local Plan Policy CS30 biodiversity and geodiversity, sets out policy requirements for the protection and where possible, a net gain in biodiversity.
49. In addition, a 10% biodiversity net gain (BNG) is required as per the Environment Act 2021 though exemptions apply. This proposal is exempt as it is de minimis.

Heathland Mitigation

50. The site is within 5km of a designated Dorset Heathlands SPA (Special Protection Area) and Ramsar Site, and part of the Dorset Heaths candidate SAC (Special Area of Conservation) which covers the whole of Bournemouth. As such, the determination of any application for an additional dwelling(s) resulting in increased population and domestic animals should be undertaken with regard to the requirements of the Habitat Regulations 1994. It is considered that an appropriate assessment could not clearly demonstrate that there would not be an adverse effect on the integrity of the sites, particularly its effect upon bird and reptile habitats within the SSSI.
51. Therefore, as of 17th January 2007 all applications received for additional residential accommodation within the borough is subject to a financial contribution towards mitigation measures towards the designated sites. In this case, contribution is required for the two additional rooms over a C4 HMO. A contribution of £720 along with £75 admin fee would need to be secured.

New Forest SAMMS

52. The site lies within 13.8km of New Forest SAC, New Forest SPA and New Forest Ramsar, which are protected under European legislation for their wildlife importance.
53. It has been demonstrated in the recent report by Footprint Ecology to the New Forest Steering Group (New Forest Strategic Access Management & Monitoring (SAMM) Strategy October 2024) and in agreement with Natural England that additional recreational pressure from additional dwelling(s) have the potential to harm the integrity of these designated sites.
54. The proposed development must secure the appropriate level of mitigation to safeguard the New Forest designated sites from recreational related impacts. This will be secured through a Section 106 Agreement. A contribution of £600 along with £60 admin fee would need to be secured, HMOs exceeding six bedrooms must pay a fee of £300 per additional bedroom. As the proposal is for eight

bedrooms the site has been charged fees for two additional dwellings to mitigate harm as a result of the larger dwelling.

55. Once paid, the appropriate assessment can conclude that the plan or project will not adversely affect the integrity of the habitats site and would accord with the requirements set out in Section 63 of the Conservation of Habitats and Species Regulations 2017.

Planning Balance / Conclusion

56. Overall, it is considered that the proposal is not adjacent or located within 100m “of more than 10% of dwellings” that “are within a Use Class C4 or Sui Generis HMO use” as set out within Policy CS24 of the Core Strategy. Furthermore, the development would not result in an overconcentration of HMO use that would cause harm to the character and appearance of the area or to nearby residential amenity and in this regard accordance with policy 6.17 of the District Wide Local Plan is achieved. The development would result in the retention of the existing building and a scale and density of development in keeping with the character and appearance of the area.
57. Therefore, having considered the appropriate development plan policy, including the NPPF, it is considered that subject to compliance with the conditions attached to this permission and upon receipt of mitigation fees, the development would be in accordance with the Development Plan, would not materially harm the character or appearance of the area or the amenities of neighbouring and proposed occupiers and would be acceptable in terms of traffic safety and convenience. The Development Plan Policies considered in reaching this decision are set out above.

Recommendation

58. Conditional GRANT

RECOMMENDATION I - That delegated authority be granted to the Head of Planning Operations to Grant Conditional Permission subject to:

- (a) satisfactory completion of a Legal Agreement necessary to secure the mitigation of the impact of the proposed residential development on Dorset Heathlands and the New Forest SAMMS by securing the payment of a financial contribution and conditions (below)

RECOMMENDATION II - That delegated authority be granted to the Head of Planning Operations to add/amend conditions where necessary.

RECOMMENDATION III - That delegated authority be granted to the Head of Planning Operations to refuse planning permission if a Legal Agreement has not been satisfactorily completed within three months of the date of this resolution.

Conditions

1. The development hereby permitted shall begin not later than the expiration of three years beginning with the date this permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall only be carried out in accordance with the following approved plans:

Reason: For the avoidance of doubt and in the interests of proper planning.

3. The development hereby permitted shall only be constructed of materials the details of which are set out on the application form.

Reason: To safeguard the visual amenities of the locality.

4. Notwithstanding details shown on the submitted plans, within 3 months of the commencement of the development, details of the internal cycle stand arrangement within the shown cycle store shall be submitted to and approved in writing by the Local Planning Authority. The construction/provision of the cycle parking shall be carried out in accordance with the agreed details and completed prior to occupation of the new development hereby approved. The cycle parking shall thereafter be retained, maintained and kept available for the occupants of the development at all times.

Reason: To promote the cycling mode of transport and in accordance with Policy CS18 of the Bournemouth Local Plan Core Strategy (October 2012).

5. Before the development is occupied or utilised, the proposed car parking space shall be constructed of a bound material and arranged in accordance with approved plans and permanently retained and kept available for its intended purpose, at all times.

Reason: To ensure the proper and appropriate development of the site and to ensure that highway safety is not adversely impacted upon in accordance with Policies CS16 and CS41 of the Bournemouth Local Plan: Core Strategy (October 2012).

6. Before the development is occupied or utilised, the existing vehicular crossover (dropped kerb) at Malvern Road shall be widened to align with the proposed car parking space and shall be constructed to the specification and satisfaction of the Local Planning Authority.

Reason: To ensure the proper and appropriate development of the site and to ensure that highway safety is not adversely impacted upon in accordance with Policy CS41 of the Bournemouth Local Plan: Core Strategy (October 2012).

7. Notwithstanding details shown on the submitted plans, within 3 months of the commencement of the development, details of the physical segregation/build-out of the pedestrian inter-visibility splays shall be submitted to and approved in writing by the Local Planning Authority. The pedestrian inter-visibility splay areas shall be cleared of all obstructions over 0.6m in height above ground level and constructed in accordance with approved details. No fence, wall or other obstruction to visibility over 0.6m in height shall be erected within the area of the splay at any time.

Reason: To ensure the proper and appropriate development of the site and to ensure that the safe use of the existing walking network is not compromised in accordance with Policies CS18 and CS41 of the Bournemouth Local Plan: Core Strategy (October 2012).

8. No part of the development hereby permitted shall be occupied unless the bin store shown on approved plans 1203-PL 01 Rev C and 1203-PL 02 have been fully constructed in accordance with those approved details and thereafter at all times the approved bin stores shall be retained and kept available for use by all the residents of the development. No bin shall be stored in the open except on the day of collection other than within the approved bin store.

Reason: To preserve the visual amenities of the locality.

Informative

1. BNG:

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition ("the biodiversity gain condition") that development may not begin unless: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Bournemouth, Christchurch and Poole Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are listed in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Based on the information provided, (were this application to be recommended for approval) it is considered that the approval of a biodiversity gain plan would not be required before development can be begun and the statutory biodiversity gain planning condition would not apply. This is because the development is considered to meet the conditions of the 'de minimis' exemption, as set out in the Biodiversity Gain Requirements (Exemptions) Regulations 2024. The conditions are that the development does not impact on a priority habitat as specified under Section 41 of the Natural Environment and Rural Communities Act 2006; that the development impacts on less than 25sqm of onsite habitat that has a biodiversity value greater than zero; and that the development impacts on less than 5m of onsite linear habitat.

2. NPPF:

In accordance with paragraph 39 of the revised NPPF the Council, as Local Planning Authority, takes a positive, creative and proactive approach to development proposals focused on solutions. The Council works with applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible suggesting solutions. In this instance:

The agent was updated of any issues after the initial site visit, and was provided with the opportunity to address issues identified by the case officer and permission was granted.

Background Documents:

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Documents uploaded to that part of the Council's website that is publicly accessible and specifically relates to the application the subject of this report including all related consultation responses, representations and documents submitted by the applicant in respect of the application.

Notes.

This excludes all documents which are considered to contain exempt information for the purposes of Schedule 12A Local Government Act 1972.

Reference to published works is not included