
Progress Report: Phosphates and work undertaken to achieve nutrient neutral development in the Somerset Levels and Moors

Executive Member(s): Lead Member for Economic Development, Planning and Assets

Local Member(s) and Division: All within the affected river catchment areas of the

Tone, Parrett, and Brue

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Summary / Background

1. Somerset remains at the forefront nationally in delivering phosphate mitigation solutions to 'unlock' nutrient-neutral development.
2. The first and second parts of this report are for information. These update the Strategic Planning Committee on recent work undertaken across the Authority area, to achieve nutrient neutral development whilst also supporting housing growth. The report then outlines the anticipated legislative changes flowing from the Levelling Up and Regeneration Bill and provides an update on the Council's funding bid for £10m to the Government's Nutrient Mitigation Fund.
3. The third part of this report considers and recommends an expansion to the allocation process for phosphate credits or 'P-credits' available through the Council's River Tone P-credit scheme.

Recommendations

4. That the Strategic Planning Committee notes:
 - a. The content of this report and the activity across the 3 affected river catchments which continues to unlock the delivery of housing and affected development which has been on hold due to the need to ensure nutrient neutrality.

- b. The anticipated legislative changes flowing from the Levelling Up and Regeneration Bill, (as summarised in paragraphs 33 to 38 of this report).
- c. The outcome of the Council's funding bid to the Government's Nutrient Mitigation Fund.

That the Strategic Planning Committee agrees:

- d. An expansion to the criteria for River Tone P-credit allocation to allow for the allocation of remaining River Tone P-credits to prioritise all full planning applications, applications for the approval of reserved matters or discharge of conditions and Section 73 applications that relate to C3 housing development or traveller accommodation and are otherwise 'ready to proceed' in planning terms.
- e. That 10 River Tone P-credits are 'ringfenced' and can only be allocated to minor applications for housing development i.e. proposals for less than 10 dwellings.
- f. The River Tone P-credit scheme maintains the requirement that P-credits are allocated to planning applications for 'implementable development' (i.e. development that can be commenced within 3 months of planning permission being granted (unless otherwise agreed with the Local Planning Authority)).

Purpose of the Report

- 5. The purpose of the first part of report is to provide the Strategic Planning Committee with an update on recent work undertaken in relation to nutrient neutrality. The update is on a Somerset wide basis in the three river catchments of the River Tone, Brue and Parrett which feed into the Somerset Levels and Moors Ramsar site. The geographical extent of the affected river catchment areas is shown in Appendix A.
- 6. The second part of the report outlines the key anticipated legislative changes, as currently drafted within the Levelling Up and Regeneration Bill. This part of the report also provides an update on the Council's funding bid for £10m to the Government's Nutrient Mitigation Fund.
- 7. The third part of this report considers whether the allocation process for Council's River Tone P-credits should be updated, and the committee is asked to agree recommendations d, e and f.

Background to Report

8. The Strategic Planning Committee considered an update report on the 23 July 2023 (available [here](#)). The report in July gave details about Natural England's (NE) Advice note of August 2020, concerning the unacceptable levels of phosphates in the Somerset Levels and Moors Ramsar site and the implications of the European Court judgment known as Dutch N. The report also gave details of the types of planning applications (e.g. residential development) that required an appropriate assessment under the Habitats Regulations to demonstrate nutrient neutrality before planning permission can be granted.
9. In March 2022, NE also issued a letter in relation to the unfavourable condition of the River Axe Special Area of Conservation (SAC) which also affects part of the Somerset area around the Blackdown Hills and Chard. To that end, officers are working with colleagues in Devon and Dorset on this affected catchment area, but it is causing less wide-ranging issues in Somerset, compared to the Somerset Levels and Moors catchment area.

Update on Progress to Date

Across Somerset:

Progress on updating the Phosphate Budget Calculator

10. Details on the key changes being made to the Somerset Phosphate Budget Calculator were reported to this Committee in the July 2023 report, as referenced above. At the time of drafting this report, we have received NE's sign off of the updated calculator which seeks to align the Somerset Phosphates Budget Calculator with the NE national Phosphates Budget Calculator, whilst still using Somerset specific data. At the time of writing, Officers are in the process of updating the [Somerset Phosphates webpage](#) to include details of the updated calculator, and transitional arrangements for its use.

Regular Meetings with Key Stakeholders

11. Officers from all of the area planning teams, and Dorset Council continue to have regular monthly meetings with the Environment Agency (EA), NE, and Wessex Water officials, the next meeting being on the 25 October 2023. The last regular agents / developer forum meeting was held on the 27 July 2023. The next meeting is scheduled for the 7 December 2023. Audio recordings of Developer Forum meetings are circulated to all those invited, as well as being uploaded onto the Somerset Council YouTube page. The July meeting is available to listen to [here](#).

Lobbying Central Government

12. Since the receipt of the NE advice letter of the 17 August 2020, Officers and Members have lobbied central government on a range of issues. The various letters that the Council have sent cover a range of matters, such as the funding and delivery of interim mitigation solutions, 5 Year Housing Land Supply, and the effect of Small and Medium-sized Enterprises (SMEs). Letters to Ministers and their replies are available on the Council website at.

<https://www.somerset.gov.uk/planning-buildings-and-land/phosphates-on-the-somerset-levels-and-moors-ramsar-site/>

Legal Challenge to Nutrient Neutrality: Jurston Farm, Wellington

13. Details on the background to this national test case were reported to this committee in July 2023 (See Paragraphs 17 to 19 of the Committee Report available [here](#)).

14. Following a dismissed planning appeal, on the 30 June 2023, the High Court dismissed a challenge by CG Fry & Son to the operation of the Habitats Regulations. The judgment is available here: [High Court Judgment Template \(landmarkchambers.co.uk\)](#)

15. Following the High Court's decision the Appellants made an application for a further appeal to be heard by the Supreme Court. The Appellants however were not given leave to apply direct to the Supreme Court. Accordingly, the next stage will be a substantive appeal hearing in the Court of Appeal and we are currently awaiting a hearing date.

River catchment area updates

River Tone

16. This catchment is within the Somerset West area with the towns of Taunton and Wellington and its environs impacted.

17. At the time of drafting this report, approximately 100 planning applications are still held in abeyance seeking a phosphate solution. This includes c. 30 applications for major development, c. 20 applications for the discharge of conditions and 5 applications for the approval of reserved matters. Overall, this equates to circa 3,000 dwellings.

18. Somerset is one of only a handful of Councils across the country to have its own operational nutrient credit scheme. This is in place in the River Tone catchment area. The Interim Phosphates Mitigation Strategy for the River Tone catchment area (the Interim Strategy), in its entirety aims to unlock between 174 and 871 homes. The background to the creation of P-credits, decisions made by the former Somerset West and Taunton (SWT) Council, the allocation process and progress to date were reported to this Committee in July 2023. The report to 5 October 2021, SWT Full Council gives further details on the background to this scheme, and it's purpose of facilitating new homes. It is available at:

<https://democracy.somerset.gov.uk/CeListDocuments.aspx?CommitteeId=637&MeetingId=4053&DF=05%2f10%2f2021&Ver=2>

19. Progress on the scheme is set out below:

- 53 planning applications have been offered River Tone P-credits as part of Round 1.
- 29 no. applications for River Tone P-credits have been received in Round 1.
- 8.5 P-credits have been allocated, equating to 41 no. dwellings.
- Currently 22 no. planning applications have been offered P-credits in Round 2.
- At the time of writing 4 no. planning applications have been approved as part of Round 2 (i.e. are proceeding to agree a Section 106 (S106) Agreement) equating to 0.9 P-credits.

20. In addition to the Council's P-credit scheme, as in other Area Planning Teams, planning applications are progressing in the River Tone catchment area where applicants have their own phosphate mitigation solution. In addition, Officers continue to liaise with third party credit providers to create further P-credit solutions within the catchment area.

River Brue

21. This catchment covers the western half of Somerset East and parts of Somerset South area with 4 out of 5 of the main towns impacted in the Somerset East area.

22. At the time of drafting this report, approximately 67 planning applications are held in abeyance seeking a phosphate solution equating to circa 1,100 dwellings.

23. The Council have signed off three private phosphate credit schemes in the Brue catchment.

- a. Yew Tree Farm, Walton. A scheme involving the closure of a pig farm generating 48 P-credits. Currently, 45.8 P-credits have been allocated releasing 450 dwellings.
- b. Manor Farm, Prestleigh (farm closure/fallowing of land – agreed May 2023) generating 143 P-credits which is anticipated will unlock approximately

1400 dwellings. A second phase may come forward if all these are allocated.

c. Hillcrest Farm in Somerset South area anticipated to deliver c. 13 P-credits.

24. Both the calculation of credits and management plans have been agreed with Natural England and secured via a S106 agreement. However, all P-credit sales/allocations are agreed between promoter and applicant. The LPA has no control on prioritising applicants or credit pricing. Agreed allocations are confirmed by a certificate provided to the LPA.

25. A limited number of applications have also been agreed to date with their own mitigation solutions (woodlands, PTP upgrades).

River Parrett

26. This catchment is within Somerset South. All of the main towns are impacted (with the exception of Wincanton, the villages of Templecombe and Henstridge and surrounding countryside) and the extent of the affected areas crosses into Dorset in the environs of Sherborne.

27. At the time of drafting this report, there are approximately 320 planning applications held in abeyance seeking a phosphate solution including 54 majors. This equates to approximately 4,500 dwellings. This figure includes 2,500 houses at the post committee / Section 106 stage.

28. With regard to progress to date:

- a. 240 dwellings (4 applications) are either approved or have a resolution to approve subject to S.106 using appropriately managed Package Treatment Plants.
- b. 160 dwellings (4 applications) have been approved or have a resolution to approve using retrofitting of water efficiency measures. We are working with registered providers operating in Area South to develop opportunities to extend the programme to develop a credit bank to be established to unlock larger sites.
- c. 65 dwellings (2 applications) have been approved or have a resolution to approve using woodland planting.
- d. 310 dwellings approved which rely upon fallow land solutions. (The approvals date back to Spring 2021 and 2022)
- e. Agreed the roll out of a programme of septic tank replacements with more efficient Package Treatment Plants to unlock credits.
- f. EnTrade has run its first "market round" which has allocated credits to applications for some 80 dwellings and 2 care homes with some 130 bedroom spaces. A second market round will be run during Autumn 2023.

and there are plans for its first market round in the River Parrett catchment. (Further information available at: somersetcatchmentmarket.uk).

29. Further details about the background to EnTrade , the environmental services they provide as a subsidiary of Wessex Water, including their P Credit scheme, were reported to this committee in July 2023 (The Committee Report available [here](#)).
30. Somerset Council is also currently drafting the relevant S106 Agreements to enable the release of two third-party land use change projects based upon short term fallowing leading to wetland with a woodland fallback. Together these will release 270 kg of credit.

Other Matters: Levelling up and Regeneration Bill

31. As members of the Committee may be aware and as reported in the national media, there have been a turbulent few weeks at the end of August and the beginning of September 2023 for nutrient neutrality.
32. On Tuesday 29 August 2023 the Secretary of State for Levelling Up, Housing and Communities, Michael Gove MP announced an intention to introduce late amendments to the Levelling Up and Regeneration Bill (LURB) at the third reading stage in the House of Lords, to remove the obligation upon developers of applications for housing, overnight accommodation and similar land uses to meet an obligation to deliver "nutrient neutrality". Further information on this was provided to the Council in the Chief Planner's letter which is available on the Phosphates webpage, [here](#).
33. However, the House of Lords rejected the Government's amendments to the Levelling Up and Regeneration Bill, and the proposed amendments concerning nutrient neutrality will not now form part of the LURB.
34. The provisions within the LURB prior to these late amendments do however remain in place. As part of these provisions the House of Lords approved a new duty on water companies to upgrade wastewater treatment works in designated areas by 2030. Somerset Council has previously received advice from NE that this provision means that once the LURB receives Royal Assent these upgrades can be considered to be 'certain' for the purposes of an assessment under the Habitats Regulations. This means that applicants will be able to factor in the 2030 improvements into their Phosphate Budget Calculations for new development thereby reducing the mitigation requirement from 2030 onwards. It should be noted that these upgrades will not apply to all Wastewater Treatment Plants

(WwTW) and in summary, it will be the WwTW that serve the largest populations that will be upgraded. We are awaiting further information as to what this looks like for Somerset and which WwTW will not be upgraded as part of LURB provisions.

35. At the time of drafting this report, it is our understanding that the LURB will receive Royal Assent before the King's Speech on the 7 November 2023.
36. From recent announcements it seems likely that the government will introduce a separate Bill in the King's Speech relating to their proposed changes to nutrient neutrality rules, originally proposed through the LURB. Introducing a new Bill through the Kings Speech would allow the House of Commons to exercise its primacy over the upper chamber and push the legislation through.

Other Matters: Government Nutrient Mitigation Fund

37. At the end of May 2023, Somerset Council, in partnership with Dorset Council, Farming and Wildlife Advisory Group (FWAG), Plymouth University and Salinity Solutions et al, submitted a funding bid to the Government's Nutrient Mitigation Fund. The funding proposal seeks capital funding (£9.63m) and revenue funding (£0.9m)
38. The funding aims to deliver both interim (to 2030) and in perpetuity phosphate mitigation measures to unlock affected housing development at scale. The programme seeks to significantly increase the supply of P credits, to assist all impacted developments in Somerset. Further details about the contents of the bid were reported to this committee in July 2023 (The Committee Report is available [here](#)).
39. A letter (enclosed as Appendix B) has been sent to the Secretary of State seeking clarity on the outcome of our partnership bid. At the time of drafting this report, a reply is awaited.

Review of the River Tone (P) allocation process

40. As set out above, Somerset Council is one of only a handful of Local Authorities across the country that has an operational P-credit scheme.
41. Since the River Tone P-credit scheme started allocating P-credits in December 2022, it has operated on a 'criteria' basis, meaning that River Tone P-credits have been offered to applications held in abeyance in accordance with criteria agreed by the former SWT Phosphates Planning Sub-Committee.

42. The basis for setting the criteria was agreed by SWT Phosphates Planning Sub-Committee in February 2022 and the report is available [here](#). The process for Round 2 of the P-credit scheme was agreed by the Sub-Committee in March 2023. The criteria approach was developed based on the River Tone P-credit scheme objectives which are as follows:

- Objective 1 – Facilitating the delivery of sustainable development;
- Objective 2 – Supporting post-Covid 19 recovery;
- Objective 3 – Supporting small and medium-sized businesses (SMEs);
- Objective 4 – Maintaining a 5-year housing land supply (5YHLS) and meeting the housing delivery test (HDT);
- Objective 5 – Meeting other housing duties, including facilitating the delivery of affordable housing;
- Objective 6 – Timely delivery; and
- Objective 7 – Value for money/Cost recovery.

43. What this has meant in practice is:

- **Round 1** – prioritised planning applications for minor housing development (i.e. planning applications for C3 use classes or traveller accommodation comprising less than 10 dwellings).
- **Round 2** – prioritised planning applications for minor housing development (that were not included as part of Round 1) **AND** both major and minor planning applications for C3 housing development that exceeds affordable housing policy.

44. At its outset, the River Tone P-credit scheme offered P-credits to applications held in abeyance as a result of the need to demonstrate nutrient neutrality and submit an HRA. As such planning applications offered River Tone P-credits in Round 2 were those that were on the list of planning applications held in abeyance as at 30 March 2023.

45. In all cases, it was agreed that River Tone P-credits should be allocated to applications for **'implementable development'** which was defined as development which could commence on site within 3 months of planning permission being granted.

46. It is now almost 12 months since the River Tone P-credit scheme became operational and Officers have recognised a need to reflect and review on progress including the way in which River Tone P-credits are allocated to affected applications.

47. At the moment the River Tone P-credits that are currently available to offer to applicants are linked to a temporary following land scheme in Taunton which Somerset Council is working on in partnership with the private sector. At present there are 4 no. planning applications progressing to agree a Section 106 Agreement to secure P-credits as part of Round 2. This equates to 0.9 P-credits. We are aware of a further 6 no. planning applications that have applied or have confirmed that they will be submitting an application for River Tone P-credits as part of Round 2. These applications are estimated to require 3.5 River Tone P-credits to achieve nutrient neutrality.

48. In consideration of the above, even if the 10 no. planning applications progress as part of Round 2, there are still River Tone P-credits remaining to be allocated, c. 30 no. in total. Given the progress to date, and the overarching objective of the scheme to 'unlock' development and facilitate delivery as soon as possible, Officers have identified a need to amend the P-credit allocation criteria to allow a broader range of planning applications to access the River Tone P-credits.

49. Various options have been considered as to how this could be done which are outlined in the table below.

50. Officers also considered the requirement for River Tone P-credits to be allocated to implementable development. It is recommended that this overarching criteria is retained under all of the options outlined in the table below given the objective for the scheme to ensure 'timely delivery'. For this reason, it is recommended that outline planning applications are not prioritised for River Tone P-credits at this time, on the basis that the approval of reserved matters and discharge of conditions mean that commencement within 3-months is not considered to be viable for outline proposals.

Table 1 River Tone P-credit Allocation: Options Assessment

	Summary	Appraisal against scheme objectives
Option 1	All criteria removed and River Tone P-credits available to all planning applications regardless of development type.	This option would facilitate all of the objectives, however not prioritising C3 housing development and traveller accommodation may result in the P-credit scheme's contribution to objectives 4 and 5 not being maximised. In addition, objective 3 (supporting SMEs) may also be a disbenefit of this option.

Option 2	Retain criteria for River Tone P-credits to be allocated only to housing development (C3 use classes and traveller accommodation).	This option would ensure that objectives 4 and 5 are maximised (as well as meeting objectives 1, 2, 6 and 7) however it may result in unintended consequences for objective 3 if the remaining P-credits were to be allocated to a single major development.
Option 3	Retain criteria for River Tone P-credits to be allocated only to housing development (C3 use classes and traveller accommodation) but 'split' the remaining River Tone P-credits into two 'pots' and ensure that 10kg/year (i.e. 10 River Tone P-credits are 'ringfenced) and can only be allocated to minor applications for housing development (i.e. planning applications for less than 10 dwellings).	This option would ensure that objectives 4 and 5 are maximised but also would support objective 3 by ensuring that a proportion of available River Tone P-credits are only available to minor developments. This would also support objective 1 and 2 as well objectives 6 and 7.

51. Based on the progress of the River Tone P-credit scheme to date and the objectives of the scheme as outlined in the Report to Phosphates Planning Sub-Committee in February 2022, Officers view is that **Option 3** is the preferred option. **(Recommendations d and e).**

52. In consideration of the need to ensure that the objective of 'timely delivery' is met, and the associated 3-month commencement period, River Tone P-credits should continue to be allocated to planning applications that are 'ready to proceed' i.e. those planning applications that have no other outstanding planning issues and can be determined positively subject to a Section 106 Agreement. **(Recommendations f).**

Conclusion

53. This report is about ensuring nutrient neutral development and unlocking stalled planning applications within the river catchments of the Tone, Parrett and Brue which are hydrologically linked to the Somerset Levels and Moors.

54. In September 2023, the proposed amendment by the Government was not supported and so the current legal position remains that all affected development must demonstrate that it is nutrient neutral before planning permission can be granted. The government has indicated that it will seek to bring forward a separate bill in the Kings Speech on 7 November 2023. However once the LURB

is enacted, and based upon advice from NE, applicants will be able to factor in to their mitigation calculations the 2030 improvements to WwTW's which will reduce their requirement. It should be noted that these upgrades will not apply to all WwTW.

55. Accordingly, until the law is changed there is a continuing need for a coordinated and appropriately resourced approach to phosphate mitigation in order to achieve nutrient neutral development within the Somerset Levels and Moors catchment in order to deliver the planned housing development compliant with the Habitats Regulations.

56. In the context of these uncertainties action on a Somerset-wide basis continues under several workstreams as outlined within this report. A significant number of solutions are being progressed within each of the river catchment areas. Furthermore, we continue to lobby central government on various matters such as the Nutrient Mitigation Fund.

57. Somerset is one of only a handful of Councils across the country to have its own operational nutrient credit scheme for the River Tone catchment area. Having reviewed the scheme, the report recommends widening the criteria to the allocations process, whilst remaining true to its intended purpose of prioritising small scale implementable development.

Links to Council Plan

58. The Council Plan sets out the Key Priorities of the Council and is available on the Council website at: <https://www.somerset.gov.uk/council-and-democracy/somerset-council-council-plan-2023-2027/>

59. This report has links to various corporate priorities including:

- a. Greener, More Sustainable Somerset
- b. A Flourishing and Resilient Somerset

Financial and Risk Implications

60. Not relevant to this information report. Risks have been set out the body of previous reports and presentations to Members of the former Councils.

Legal Implications

61. The legal and policy background to the 'phosphates issue' have been set out the body of previous reports and presentations to Members of the former Councils. A legal update on the LURB as currently drafted is given in this report (see

paragraphs 31 to 36 above). To assist applicants, template Section 106 Agreements has been prepared and are also available to view on the phosphates' webpage. This documentation has been produced in consultation with NE.

HR Implications

62. None related directly to this information report.

Other Implications:

Equalities Implications

63. The Public Sector Equality Duty has the following aims which the authority must have due regard to:

- a. Eliminate discrimination, harassment, victimisation.
- b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

64. None of the above relate directly to this information report.

Community Safety Implications

65. This can include:

- possible impact upon local crime rates.
- likely impact upon reoffending rates.
- ability for services to help prevent crime and disorder.
- Overall impact upon quality of life and wellbeing.
- Increase or reduce fear of crime.
- Impact on social isolation or exclusion.

66. None of the above relate directly to this information report.

Climate Change and Sustainability Implications

67. Somerset Council has declared both a Climate and Ecological Emergency. Through that, the Council has committed to working towards making the whole county, including our own estate and operations, 'Carbon Neutral' by 2030 and to take positive action to reverse the damage on our natural habitats by man-made activity. We have also pledged to ensure that Somerset is resilient to, and prepared for, the effects of Climate Change.

68. The climate and sustainability implications of development proposals is a material planning consideration which will be assessed for each planning application which applies for P-Credits.

69. As explained within the report, in light of NE letter of August 2020, concerning the unacceptable levels of phosphates present in the Somerset Levels and Moors Ramsar site. nutrient neutral development does not make the situation any worse, but neither does it help to improve the situation.

Health and Safety Implications

70. None related to this information report.

Health and Wellbeing Implications

71. None related to this information report.

Social Value

72. None related to this report.

Asset Management Implications

73. None related directly to this report. The management of interim phosphate solutions on SWT owned sites has passed to Service Director – Strategic Asset Management in the new Council to manage in the long term.

Data Protection Implications

74. None related to this report.

Background Papers and web links

Natural England Advice to LPAs on Nutrients in the Somerset Levels and Moors (17 Aug 2020): PDF of letter available at:

<https://somersetcc.sharepoint.com/sites/SCCPublic/Planning%20and%20Land/Forms/AllItems.aspx?id=%2Fsites%2FSCCPublic%2FPlanning%20and%20Land%2FSW%26T%20Natural%20England%20Advice%20to%20LPAs%20on%20Nutrients%20in%20the%20Somerset%20Levels%20and%20Moors%20%2817%20Aug%202020%29%2Epdf&parent=%2Fsites%2FSCCPublic%2FPlanning%20and%20Land&p=true&ga=1>

Somerset Levels and Moors: Background to phosphates

<https://www.somerset.gov.uk/planning-buildings-and-land/phosphates-on-the-somerset-levels-and-moors-ramsar-site/>

River Axe Special Area of Conservation

<https://www.somerset.gov.uk/planning-buildings-and-land/phosphates-on-the-somerset-levels-and-moors-ramsar-site/river-axe-special-area-of-conservation/>

Somerset Phosphate Budget calculator

<https://www.somerset.gov.uk/planning-buildings-and-land/phosphates-on-the-somerset-levels-and-moors-ramsar-site/phosphate-budget-calculator/>

Somerset Strategic Planning Committee: July 2023: Progress Report: Phosphates

<https://democracy.somerset.gov.uk/documents/s10992/Update%20Phosphate%20cttee%20report%207.7.23.pdf>

Developer Forum meeting: July 2023 available to listen to at

<https://www.youtube.com/watch?v=jKznxTMCCiU>

Levelling Up and Regeneration Bill

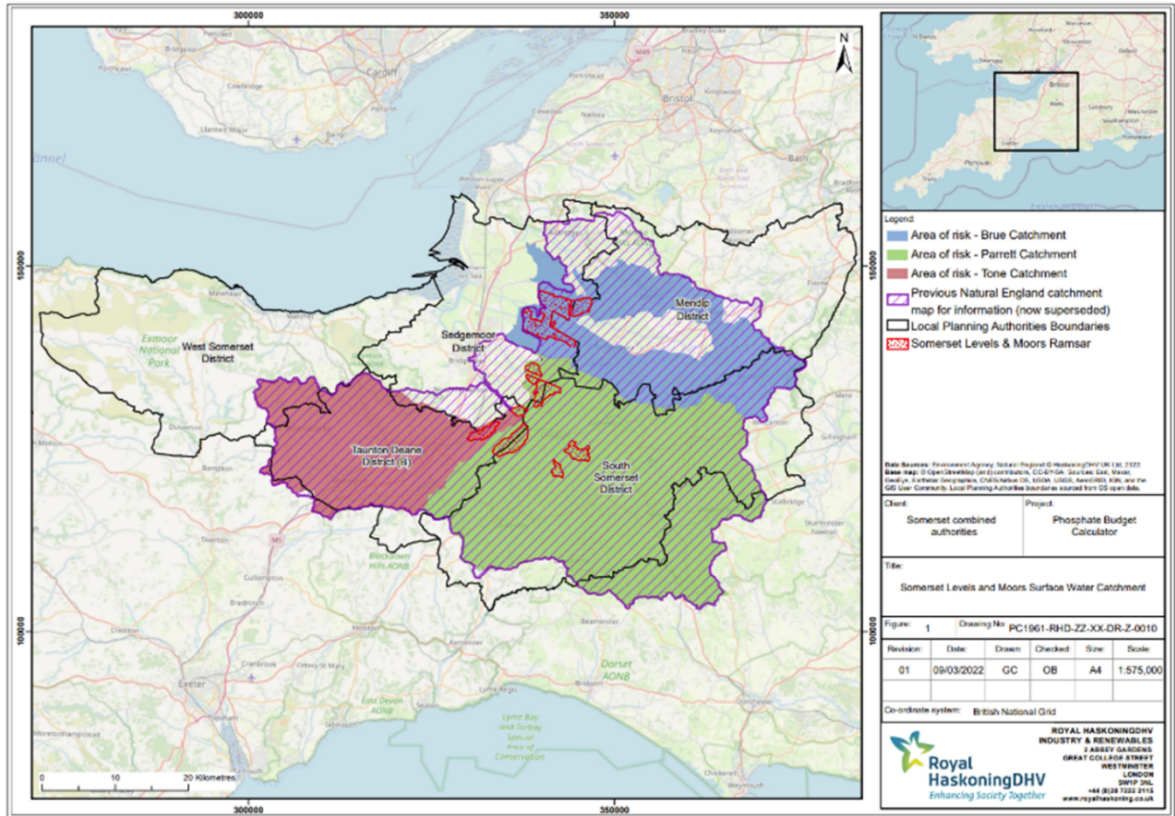
<https://bills.parliament.uk/bills/3155>

Chief Planner's letter which is available on the Phosphates webpage

[Government Announcement on Nutrient Neutrality: 29 August 2023 \(somerset.gov.uk\)](#)

Appendices

Appendix A: the geographical extent of the affected river catchment areas



Appendix B: Letter sent to Secretary of State: 29 September 2023.



Letter to Rt Hon Michael Gove MP re