

COMMITTEE REPORT BY THE DIRECTOR OF ENVIRONMENT AND NEIGHBOURHOOD SERVICES READING BOROUGH COUNCIL PLANNING APPLICATIONS COMMITTEE: 5th September 2018	ITEM NO.
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Ward: Out of Borough

App No.:180855 ADJ (South Oxfordshire District Council ref P18/S1522/O)

Address: Land adjacent to Highdown Avenue, Emmer Green, Reading RG4 8QS

Proposal: Outline application to establish the principle for use of the site for Class C3 Residential occupation; means of access from Highdown Hill and density of Class C3 residential to be determined under this application.

Applicant: Mr Sunny Nahal

Date validated: 2nd July 2018 (by South Oxfordshire District Council)

Major Application: South Oxfordshire District Council 13 week target decision date: 13th October 2018.

RECOMMENDATION:

1. That South Oxfordshire District Council be informed that Reading Borough Council OBJECTS to the application on the following grounds:
 - a) Development beyond the Reading Borough Council boundary at this location has not been subject to any detailed assessment through the Local plan process by either Reading or South Oxfordshire Council. The proposed development is inappropriate piecemeal development that does not accord with adopted planning policy, that has not been properly planned and makes no provision for necessary infrastructure and is therefore considered to be unacceptable in principle. Reading Borough Council therefore objects to the submitted scheme contrary to para 49 and 50 of the National Planning Policy Framework (NPPF).
 - b) Visibility at the proposed junction of Highdown Avenue and Highdown Hill Road is substandard, and the increased traffic generated by the development would be a hazard to road users, and in conflict with Core Strategy Policy CS20 and Sites and Detailed Policies document Policy DM12 and NPPF Para 110.
 - c) Highdown Hill Road is unsuitable, due to its substandard width, to accommodate the additional vehicular traffic, pedestrian and cyclists which would be generated by the proposed development. This would have an adverse effect on road safety and the flow of traffic, in conflict with Core Strategy Policy CS20 and Sites and Detailed Policies document Policy DM12 and NPPF Para 110.
 - d) The proposed development is unlikely to function or operate in a sustainable manner, taking account of the predicted generation of vehicular traffic and the site's relatively remote location, which is poorly served by public transport links and pedestrian/cycle routes. The proposal would therefore be contrary to Core Strategy Policy CS4 and NPPF Para 110.
 - e) It is not considered that the quantum of development proposed on this sloping site would retain the local landscape character or enhance biodiversity within and surrounding the site and is unacceptable on this basis. The proposal would therefore be contrary to NPPF Para 170.

- f) The proposal would have a significant impact on the surrounding infrastructure in Reading Borough including highways, open space/leisure facilities (encompassing the use of Emmer Green Recreation Ground and Bugs Bottom), air quality and the provision of affordable housing. No clear plan or mechanism to secure appropriate mitigation to these impacts has been secured without which the scheme is considered unsustainable and contrary to para of the National Planning Policy Framework Para 54.

2. If South Oxfordshire District Council is minded to approve the application, it should jointly work with Reading Borough Council to identify infrastructure pressures in the local area and direct new provision accordingly.

South Oxfordshire District Council is sent a copy of this report and all comments received for their information and use.

1. INTRODUCTION

1.1 Reading Borough Council (RBC) has been consulted on the above planning application by South Oxfordshire District Council (SODC). The majority of the application site is within South Oxfordshire District, but sited directly adjacent to the administrative boundary of Reading and existing residential development within Reading. The site is located to the west of Highdown Avenue and would be accessed via this existing private road. The western end of the roadway that forms Highdown Avenue is shown within the applicants red line and is sited within Reading Borough. The site is bounded to the south by Gravel Hill and to the north and west by mixed woodland, Reading Golf Course and open countryside beyond.

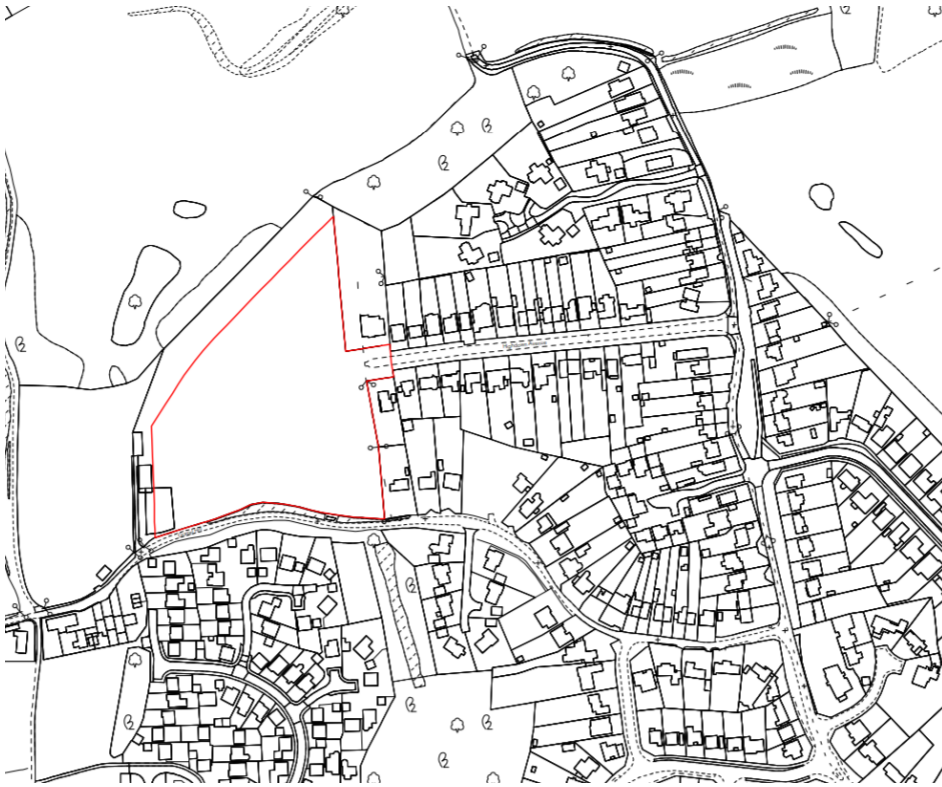
1.2 The site was formally agricultural land but currently contains structures and a ménage associated with equestrian use of the site and storage containers at the entrance to the site, as viewed from Highdown Avenue.

1.3 As a consultee rather than the determining authority, RBC was given 14 days to comment on this application. SODC have agreed to extend this deadline for comment in order that the application can be considered by this Planning Committee, as the proposal is defined as 'major' development; and its comments forwarded.

2.0 PROPOSAL

The proposal specifies the application has been submitted in Outline to establish the principle for use of the site for Class C3 Residential use. This application seeks to consider land use (residential), means of access (via Highdown Avenue) and Density (indicative layout plans show approximately 39 semi detached dwellings). Indicative plans are set out at the end of the report. All other matters are Reserved for further consideration.

Site Location Plan



Aerial Photograph (from submitted information)



3. **RELEVANT PLANNING HISTORY**
N/A

4. **CONSULTATIONS**

- 4.1 South Oxfordshire District Council has carried out its own consultations including residential properties within Reading Borough adjacent to the application site. Reading Borough Council has additionally carried out its own consultation exercise and consulted all properties on Highdown Avenue, and properties directly south of the site to the south of Gravel Hill. A site notice was also erected by the Reading Borough Council case officer at the junction of Highdown Avenue and Highdown Hill Road.
- 4.2 For clarity the consultation exercise was undertaken twice as the application was validated in error by SODC and consultation responses sought; the application was then not considered to be valid until further information was provided. On receipt of this further information the application was correctly considered to be valid and consultation responses re-issued.

RBC's consultation responses are outlined below:

RBC Transport Strategy: Object

Transport Comments

Access

The proposals comprise the development of up to 40 residential units with associated landscaping and parking. The proposed development will maintain the existing access point to the site from Highdown Avenue, running in an east to west direction to the eastern edge of the site.

As stated above access is to be gained from the western end of Highdown Avenue which is a 5m wide shared surface private road. Highdown Avenue is accessed from Highdown Hill Road which again has no dedicated pedestrian footway.

Visibility splays have been provided at the Highdown Avenue / Highdown Hill Road junction and these equate to 2.4m x 18m to the north and 2.4m x 25m to the south. The TA has stipulated that these visibility splays comply with a 20mph speed, however the visibility splay requirement for a 20mph speed as stated within DfT document Manual for Streets is 2.4m x 25m and therefore the visibility splay to the north does not comply with this requirement. Irrespective, the actual speed limit of Highdown Hill Road is 30mph and therefore a visibility splay of 2.4m x 43m would be required in both directions again to comply with DfT document Manual for Streets.

Given that the proposed visibility splay does not comply with National standards the Highway Authority could not accept any increased traffic generation at this junction.

The full length of Highdown Avenue and Highdown Hill Road have no footway provision and given the carriageway width they would be unsuitable to promote as a shared surface as it is likely conflict would occur between vehicles and pedestrians and cyclists. The current

width of Highdown Hill Road is 4.7m for its majority but does decrease at certain points, with the minimum width being 3.3m just south of the Highdown Avenue / Highdown Hill Road junction.

Figure 7.1 (below) of Department for Transport document Manual for Streets identifies carriageway widths to meet the required demands.

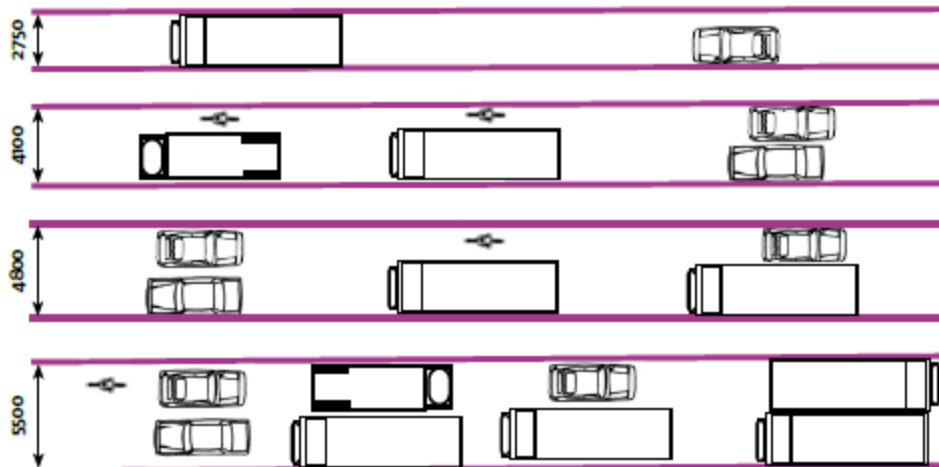


Figure 7.1 Illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.

Manual for Streets continues to state the following at Paragraph 7.2.2:

Carriageway widths should be appropriate for the particular context and uses of the street. Key factors to take into account include:

- *the volume of vehicular traffic and pedestrian activity;*
- *the traffic composition;*
- *the demarcation, if any, between carriageway and footway (e.g. kerb, street furniture or trees and planting);*
- *whether parking is to take place in the carriageway and, if so, its distribution, arrangement, the frequency of occupation, and the likely level of parking enforcement (if any);*
- *the design speed (recommended to be 20 mph or less in residential areas);*
- *the curvature of the street (bends require greater width to accommodate the swept path of larger vehicles); and*
- *any intention to include one-way streets, or short stretches of single lane working in two-way streets.*

All of the above highlighted sections are appropriate in this case and a carriageway width along with the addition that National Cycle Network Route 5 which also runs along Highdown Hill Road would need to be taken into account when determining the carriageway requirements. Without including the provision for pedestrians the carriageway width would need to be a minimum of 4.8m in width and therefore is unsuitable to accommodate additional traffic.

Officers would also stress that Paragraph 7.2.10 of DfT document Manual for Streets states:

However, shared surfaces can cause problems for some disabled people. People with cognitive difficulties may find the environment difficult to interpret. In addition, the

absence of a conventional kerb poses problems for blind or partially-sighted people, who often rely on this feature to find their way around. It is therefore important that shared surface schemes include an alternative means for visually-impaired people to navigate by.

In this case no dedicated footway is provided for pedestrians and none are proposed.

By increasing further traffic along these routes will only further encourage the use of the private car to travel as those currently walking and cycling will feel more vulnerable especially when travelling in the dark.

The National Planning Policy Framework (NPPF) requires developments to be sustainable which includes travel to and from the proposed application site. Paragraph 29 states:

Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.

The eastern site boundary is located approximately 900m from bus route 23 / 24, that provides links to the north and the south. This is however in excess of double the recommended 400m walking distance to gain access to bus services along which the route provides no dedicated footways for a distance of approximately 550m. The remainder of which the dedicated footway is between 1.2m and 1.6m and would be less than the recommended minimum width of 2m as stipulated within DfT document Inclusive Mobility.

The TA has highlighted that the site is accessible to a range of facilities by foot highlighting a 25 minute walking distance, however many of the acceptable walking distances taken from IHT would be within this with the specified 900m distance to the bus stop identified as a 10 minute walk.

IHT Providing for Journeys on Foot

	Town Centres	Commuting / School Sight Seeing	Elsewhere
Desirable	200m	500m	400m
Acceptable	400m	1000m	800m
Preferred Maximum	800m	2000m	1200m

As is mentioned above there are no continual dedicated footways or street lighting between the application site and the bus services and other local facilities. Given this and the distances exceed National Guidance this will not encourage the use of an alternative mode of transport and therefore the main option of all trips would be the private motor vehicle which is unsustainable and therefore contrary to policy.

It is considered that the location of the site is unlikely to function / operate in a sustainable manner therefore increasing journeys made by the private car and in addition the proposal would generate additional traffic movements along Highdown Hill Road which is substandard in respect of carriageway width, adversely affecting road safety and the flow of traffic.

Trip Generation

The applicant has used the Trip Rate Information Computer System (TRICS), TRICS is the national standard system of trip generation and analysis in the UK and Ireland, and is used

as an integral and essential part of the Transport Assessment process. It is a database system, which allows its users to establish potential levels of trip generation for a wide range of development and location scenarios, and is widely used as part of the planning application process by both developer consultants and local authorities and is accepted by Inspectors as a valid way to ascertain likely trip generation.

Having reviewed the TRICS data provided officers are not content that all of the sites selected are comparable to the application site. Officers have therefore undertaken their own assessment and this has identified that the resulting trip rates are similar to those provided by the applicant. Officers are therefore happy to accept the trip rates submitted.

These trip rates equate the following trip generation as taken from Table 2.2 of the TA:

Table 2.2: Trip Generation: All Modes (40 dwellings)

	Vehicles		Walking		Cycling		Public Transport		People	
	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep
AM Peak 08:00-09:00	6	15	2	8	0	1	0	1	10	32
PM Peak 17:00-18:00	13	6	4	2	1	0	1	0	24	11
Daily Total Trip Rate	180		69		9		9		326	

Given the number of movements proposed and the existing road widths do not comply with National Guidance the Highway Authority are unable to accept any further development, especially as this is likely to result in conflict between vehicles and pedestrian / cyclists.

As a result of the above the Highway Authority objects to the proposed development on the following grounds.

Reasons for Refusal

Visibility at the proposed junction of Highdown Avenue and Highdown Hill Road is substandard, and the increased traffic generated by the development would be a hazard to road users, and in conflict with Core Strategy Policy and CS20 and Sites and Detailed Policies document Policy DM12.

Highdown Hill Road is unsuitable, due to its substandard width, to accommodate the additional vehicular traffic, pedestrian and cyclists which would be generated by the proposed development. This would have an adverse effect on road safety and the flow of traffic, in conflict with Core Strategy Policy CS20 and Sites and Detailed Policies document Policy DM12.

The proposed development is unlikely to function or operate in a sustainable manner, taking account of the predicted generation of vehicular traffic and the site's relatively

remote location, which is poorly served by public transport links and pedestrian/cycle routes. The proposal would therefore be contrary to Core Strategy Policy CS4.

RBC Environmental Health -

Construction and demolition phases

Concerns are raised regarding potential noise, dust and bonfires associated with the construction (and demolition) of the proposed development and possible adverse impact on nearby residents (and businesses). Fires during construction and demolition can impact on air quality and cause harm to residential amenity. Burning of waste on site could be considered to be harmful to the aims of environmental sustainability.

The following conditions are therefore recommended:

Control of Noise and Dust - CMS to be submitted

Hours of Working - The hours of noisy construction, demolition and associated deliveries shall be restricted to the hours of 08:00hrs to 18:00hrs Mondays to Fridays, and 09:00hrs to 13:00hrs on Saturdays, and not at any time on Sundays and Bank or Statutory Holidays without prior approval from the Local Planning Authority.

No Bonfires - no waste to be burnt on site

RBC Trees - This site is located to the north of Gravel Hill a single width country lane with strong rural character. The vegetation and trees along the banks of the highway close above the road creating a tunnelled effect and a sense of enclosure. The trees and vegetation along the Borough boundary and adjacent to the public footpaths (although of variable quality), are important to the rural and verdant character of the area and provide valuable screening between the developed residential areas to the south - from the more rural landscape to the north.

In addition to identified landscape qualities, the bank on the north side of Gravel Hill is also indicated as: 'Local Wildlife Sites, Local Nature Reserves and Areas of Biodiversity Action Plan Habitat' and therefore functions as a wildlife corridor and a detrimental effect on this should be avoided.

Any future residential development within the site would be greatly enhanced by the retention of trees on and adjacent to the site. It is noted that the trees on site are not currently subject of a Tree Preservation Order therefore we would ask Officers within South Oxfordshire District Council to consider serving a temporary Area TPO on the site to ensure trees cannot be felled in order to improve the development potential of the site.

RBC Ecology - To be updated at your meeting.

RBC Housing - Have confirmed Reading Borough has a need for affordable housing.

RBC Education - Education would need to consider the additional school places needed for the new residents. Based on the yield calculation for pupils, 39 households would require an additional 12 primary and 6 secondary school places.

Within the catchment area at Primary level, there are several schools which are currently full with waiting lists, and limited places available at the remaining schools. The primary school and secondary school pupil forecasts indicate that within the locality we expect to see a high proportion of school places filled by Reading children. As this development would sit within Oxfordshire, the likelihood of children gaining a school place at a Reading school would be dictated by the Councils admissions policy, and given the popularity of Reading schools, pupils from the new development would be unlikely to gain a place. Without a clear strategy in place for new resident parents to place their children in an Oxfordshire school, they should not rely upon a Reading school to provide a school place for their children.

RBC Leisure - It is note that there is no public open space within the development nor opportunities for children and young people to play and participate in sport.

The closest play area and sports pitch to the proposed development are at Emmer Green Recreation Ground, while the closest public open space is at Bugs Bottom which is very popular with dog walkers.

Both these sites will be used by the residents of the proposed development, particularly Bugs Bottom which is less than 100m away. We would therefore be looking to secure a financial contribution by way of mitigation to improve access, infrastructure and leisure/sporting opportunities to cater for the increase in use at these sites as there are no other facilities within South Oxfordshire nearby.

Further information and analysis of the potential impacts on increased recreational pressure and their mitigation will need to be provided by the applicant to help in determining the appropriate and proportionate level of contribution required.

There is already significant use of both Bugs Bottom and Emmer Green Recreation Ground by local residents and in the absence of any measures to ensure they are not adversely affected by the proposals, we would object to this application.

PUBLIC CONSULTATION:

Reading Borough Council has received 70 letters of objection (combined total of both rounds of consultation) at the time of writing this report. These letters will be passed to South Oxfordshire District Council. The following issues were raised:

- Object due to Highdown Avenue being a private road on which there are no pavements, street lights or road drainage, resulting in additional vehicles having a negative impact on residential amenity and the safety of residents and particular children that play on the road.
- Surrounding access roads and local road junctions are inadequate for any increase in traffic including the junction of Tredegar Road, St. Barnabas Road and Surley Row.
- The development would detrimentally affect a nearby National Cycle Route and Bridleway.

- The Highdown Avenue Management Association Limited state as owner of the road it does not consent to Highdown Avenue being used to access the proposed development site.
- Nitrogen dioxide in the air has been demonstrated to be above acceptable levels in central Caversham, especially where traffic queues, object to these levels being increased.
- The application does not accord with the distribution strategy for housing in South Oxfordshire and there is great pressure for additional housing in both Reading and South Oxfordshire with land adjacent to the northern RBC boundary coming under increasing scrutiny; for example the substantial application off Peppard Road currently at appeal.
- Local services (GPs and schools in particular) are already over- stretched. The recent closure of Priory Avenue has already resulted in extra pressure being put on Emmer Green Surgery.
- Removal of vegetation would erode the rural character of this land adjacent to Emmer Green and detract from the character and appearance of the local area.
- The proposal would have a harmful impact on local wildlife.
- The site slopes leading to issues with drainage were the site to be developed.

5. RELEVANT PLANNING POLICY AND GUIDANCE

5.1 National Planning Policy Framework (NPPF) (March 2012):
Promoting Sustainable Transport paragraph 31 and 35
Planning Conditions and Obligations paragraph 203

5.2 South Oxfordshire (SODC) will consider their respective planning application in relation to their adopted planning policies and supplementary planning guidance.

6. APPRAISAL

The main considerations are:

- a. Legal context
- b. Principle of Development / Housing Need
- c. Transport considerations
- d. Landscape, Ecology and Visual Impact
- e. Infrastructure

Legal Context

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Material considerations include relevant policies in the National Planning Policy framework (NPPF) - among them the 'presumption in favour of sustainable development'.

6.2 Whilst it does not fall to RBC to determine this planning application submitted to South Oxfordshire District Council, the Council may make comments as a consultee,

and can determine any future application for the area of the site within Reading Borough Council.

Principle of Development / Housing Need

- 6.3 The application site is not allocated in the South Oxfordshire Local Plan (Core Strategy and Local Plan) nor in its emerging 2033 Local Plan (to date). Development adjacent to the border with Reading or anywhere in the vicinity of Reading has not been the subject of any discussions with South Oxfordshire District Council under the Duty to Cooperate as Reading has sought agreement with the adjoining Local Authorities within Berkshire.
- 6.4 This is primarily because Reading Borough is a small urban authority with administrative boundaries particularly to the southern, eastern and western parts that divide existing developed areas within other Berkshire Authorities. The character of the boundary with South Oxfordshire differs as this boundary effectively separates the built form within Reading from the primarily open countryside within South Oxfordshire. Reading Borough Council has not sought development in South Oxfordshire as a location for accommodating future growth of Reading in part because of the rural nature of the area such as the application site. Consequently no work has been undertaken to plan for the prospect of such cross boundary development.
- 6.5 Therefore development beyond the Borough boundary within the application site has not been subject to any detailed assessment through the Local plan process by either Reading or South Oxfordshire Council. Further development in the area of the boundary of SODC with RBC, over and above what is currently planned, will have significant infrastructure impacts which need to be properly taken account of and planned for. There are severe transport issues in this part of Reading and recent work has established that there are severe capacity issues relating to the provision of education places. The proposed development does not accord with adopted planning policy, is premature and has not been properly planned, and would form inappropriate piecemeal development; it is therefore considered to be unacceptable in principle. Reading Borough Council therefore objects to the submitted scheme on this basis.

Transport Considerations

- 6.6 As set out in the RBC Transport consultation response above, Transport officers have considered the proposal and object to the application on three separate grounds. Additionally the impact of the increase in traffic movements within Reading Borough would be required to be mitigated by a financial contribution. It is noted that Highdown Hill is a private road however access/ownership rights over this roadway are not a material planning consideration. This matter would have to be resolved between the interested parties on the grant of any planning permission.

Landscape, Ecology and Visual Impact

- 6.7 Due to the current open rural nature of the application site it contains wildlife habitats and mature vegetation, in particular on the site boundaries. As set out

above the trees and vegetation along the Borough boundary and adjacent to the public footpaths, are important to the rural and verdant character of the area and provide valuable screening between the developed residential areas to the south - from the more rural landscape to the north. In addition to identified landscape qualities, the bank on the north side of Gravel Hill is also indicated as: 'Local Wildlife Sites, Local Nature Reserves and Areas of Biodiversity Action Plan Habitat' and therefore functions as a wildlife corridor and a detrimental effect on this should be avoided. Further ecology comments to be updated at your meeting.

- 6.8 Officers therefore do not consider that the quantum and layout of development on this sloping site would retain the local landscape character or enhance biodiversity within and surrounding the site, and object to the proposal on this basis.

Infrastructure

- 6.9 It is acknowledged that due to the proximity of the development to the Borough boundary, that there will be use of social and community infrastructure within Reading Borough as a result of this development. Therefore appropriate measures should be secured to mitigate the impact on surrounding infrastructure.
- 6.10 Leisure services have noted that there is no public open space within the development nor opportunities for children and young people to play and participate in sport. Therefore new residents would utilise the Emmer Green Recreation Ground, and the public open space at Bugs Bottom, which is less than 100m away. A financial contribution by way of mitigation to improve access, infrastructure and leisure/sporting opportunities to cater for the increase in use at these sites as there are no other facilities within South Oxfordshire nearby is therefore required.
- 6.11 In relation to education, new occupants of the proposed development cannot rely upon a Reading school to provide a school place for their children as additional pupil places should be provided within the administrative boundary of South Oxfordshire. In relation to the provision of affordable housing within the scheme due to the proximity of the proposed development to the boundary with Reading an element of the affordable housing secured should go to meeting the local needs of Reading Borough. These matters will be brought to the attention of South Oxfordshire District Council.
- 6.12 This mitigation must be secured by either a S106 Legal Agreement or the CIL mechanism which South Oxfordshire District Council currently operates. On this basis Reading Borough Council further objects to the proposal if appropriate mitigation measures are not secured fully in the areas affected.

7. CONCLUSION

- 7.1 It is recommended that:

1. That South Oxfordshire District Council be informed that Reading Borough Council OBJECTS to the application on the following grounds:
 - a) Development beyond the Reading Borough Council boundary at this location has not been subject to any detailed assessment through the Local plan process by either Reading or South Oxfordshire Council. The proposed development does not accord with adopted planning policy, is premature and has not been properly planned, and would form inappropriate piecemeal development; it is therefore considered to be unacceptable in principle. Reading Borough Council therefore objects to the submitted scheme contrary to para 49 and 50 of the National Planning Policy Framework (NPPF).
 - b) Visibility at the proposed junction of Highdown Avenue and Highdown Hill Road is substandard, and the increased traffic generated by the development would be a hazard to road users, and in conflict with Core Strategy Policy and CS20 and Sites and Detailed Policies document Policy DM12 and NPPF Para 110.
 - c) Highdown Hill Road is unsuitable, due to its substandard width, to accommodate the additional vehicular traffic, pedestrian and cyclists which would be generated by the proposed development. This would have an adverse effect on road safety and the flow of traffic, in conflict with Core Strategy Policy CS20 and Sites and Detailed Policies document Policy DM12 and NPPF Para 110.
 - d) The proposed development is unlikely to function or operate in a sustainable manner, taking account of the predicted generation of vehicular traffic and the site's relatively remote location, which is poorly served by public transport links and pedestrian/cycle routes. The proposal would therefore be contrary to Core Strategy Policy CS4 and NPPF Para 110.
 - e) It is not considered that the quantum of development on this sloping site would retain the local landscape character or enhance biodiversity within and surrounding the site and is unacceptable on this basis. The proposal would therefore be contrary to NPPF Para 175.
 - f) The proposal would have a significant impact on the surrounding infrastructure in Reading Borough including highways, open space/leisure facilities (encompassing the use of Emmer Green Recreation Ground and Bugs Bottom), air quality and the provision of affordable housing. No clear plan or mechanism to secure appropriate mitigation to these impacts has been secured without which the scheme is considered unsustainable and contrary to para of the National Planning Policy Framework Para 54.
2. If South Oxfordshire District Council is minded to approve the application, it should jointly work with Reading Borough Council to identify infrastructure pressures in the local area and direct new provision accordingly.

South Oxfordshire District Council is sent a copy of this report and all comments received for their information and use.

Case Officer: Susanna Bedford

Plans:

Submitted Masterplan plan ref L(1)201-2



Axonometric view

