

LAYHAM PARISH COUNCIL

DRAFT Minutes of the Planning Meeting held at 2.30pm on
Tuesday 19 May 2020 via Zoom

Present: Charlotte Britton - Chairman (CB)
John Curran (JDC)
Bill Paton (BP)
David Pratt (DP)
Sheila Roberts (SR)
Tony Stenning (TS)
Michael Woods - Vice Chairman (MW)

In attendance: 13 Parishioners

Apologies: Jane Cryer - Parish Clerk (JC)

20.5.1P APOLOGIES

See above.

20.5.2P DECLARATIONS OF INTEREST

None.

20.5.3P PUBLIC FORUM

There were 13 parishioners present, all of whom were interested in agenda item 20.5.5P.

20.5.4P PLANNING APPLICATIONS DC/20/05966 & 7 - UPLANDS HOUSE, UPPER STREET

It was noted that permission had been granted for severance of garden, erection of single storey dwelling, erection of store / cartlodge, creation of new vehicular access, erection of garage / store, erection of new boundary walls following demolition of existing; Listed Building Consent.

20.5.5P PLANNING APPLICATIONS DC/20/01517 & 8 - THE MARQUIS, UPPER STREET

Application for erection of extensions to provide additional facilities including reception, banquet hall, wellness centre, additional bedrooms; change of use of agricultural land to create a new car parking and formal gardens, including the removal of existing over-spill car parking and associated landscaping works. Application for Listed Building Consent.

The Parish Council had assessed the application against National Planning Policy, Babergh's Local Plan and associated planning guides, and National Government policy and frameworks on planning considerations. Reference had also been made to the development guidelines within Babergh Policy for development within Hinterland villages, the classification assigned to Layham.

When considering the application, Councillors took the approach of a presumption in favour of sustainable development and reviewed the application to identify any Material Considerations, acceptable when deciding a planning application.

It was agreed that the Parish Council would object to the planning application on the basis that the adverse impacts of the application would significantly and demonstrably outweigh the benefits, when assessed against the Babergh District Planning Policies and National Frameworks.

The full submission and supporting papers are attached.

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Planning Application Response

Marquis of Cornwallis, Upper Street

DC/20/01517 and DC/20/01518

Application for erection of extensions to provide additional facilities including reception, banquet hall, wellness centre, additional bedrooms; change of use of agricultural land to create a new car parking and formal gardens, including the removal of existing over-spill car parking and associated landscaping works.

Application for Listed Building Consent

Executive Summary

Layham Parish Council have assessed this planning application against National Planning Policy, Babergh Local Plan and associated planning guides, and National Government policy and frameworks on planning considerations. Reference has also been made to the development guidelines within Babergh Policy for development within Hinterland villages, the classification assigned to Layham.

When considering the application, we have taken the approach of a presumption in favour of sustainable development and reviewed the application to identify any Material Considerations, acceptable when deciding a planning application.

Having completed our review we object to the planning application on the basis that the adverse impacts of the planning application, as detailed in this objection, would significantly and demonstrably outweigh the benefits, when assessed against the Babergh District Planning Policies and National Frameworks.

Material Planning Considerations for objection

Material Consideration 1: Sustainability and Job Creation

One of the Government's key planning aims is to encourage sustainable economic development and job creation and benefits to tourism are welcomed; however, these are not, of and in themselves, justification for approval of planning, where these conflict with other policies in the Babergh Local Plan. As noted in the **Babergh Local Plan – Economy and Development section** *“Facilities that may be proposed for locations in the countryside need careful consideration because of landscape character, biodiversity, cultural heritage, agriculture, amenity and traffic implications”*, and although small-scale employment developments in rural areas are promoted, these must be suitable to the location.

So, in terms of new development it is the responsibility of Babergh District Council to weigh up the importance of the employment proposals against that of maintaining and improving environmental quality. Proposals for the expansion of existing employment uses will be given a strong presumption in favour judged against policy **EM20** which states: *“Proposals*

for the expansion/extension of an existing employment use, site or premises will be permitted, provided there is no material conflict with residential and environmental amenity or highway safety.”

The applicant states job creation, economic benefits and increase in tourism as the key drivers for approval of the application. These are also the main drivers for any public support, although it is noted, at the time of making this submission, that none of this support comes from local residents who will be adversely impacted by the proposed development. However, both National and Local policy references “Sustainable Economic Development” and in the applicant’s own admission the current hotel premises are not currently running at anywhere near maximum capacity. Moreover, the current economic environment for this sector is uncertain to say the least and, although “viability of the proposal” is not a material consideration in planning proposals, the question of sustainability is of material consideration supported by the provisions in Babergh’s Local Plan.[EM20] to ensure that there is no material conflict with residential and environmental amenity.

In this response we have referenced a number of Material Planning Considerations that demonstrate there is material conflict on the residential and environmental amenity, as defined in **EM20**. This development is outside of the “built up” area of this Hinterland Village and is therefore not in line with Babergh Policy as defined in the **Babergh Local Plan – Economy and Development section**.

The response from the Economic Development Officer offers no objection referring to the “Open for Business Strategy” of Babergh District Council as the basis for their decision. However, within this policy it states five strategic outcomes, one of which is *“Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment in skills and innovation in order to increase productivity”*. This particular development is not only outside the “built-up” area as defined in the Babergh Local Plan but also in a Special Landscape Area. There are near neighbours who will be adversely impacted by this development as noted in the Material Considerations that form part of this objection. Therefore, it is questionable whether this application meets the key strategic outcome of being the right type of development for this location.

Conclusion: although economic development, job creation and tourism should be encouraged this should be in line with Babergh Planning Policy and National Planning Policy focused on sustainability and the requirement to ensure there is no material conflict with residential or environmental amenity. There are material conflicts with this proposal that would adversely affect the residential amenity of this village location as well as the environmental impact on the loss of a rural landscape in this Special Landscape Area on a development of questionable sustainability.

Material Consideration 2: Design and Appearance

Babergh Local Plan acknowledges the importance of ensuring that new developments complement and respect the existing pattern of buildings and spaces around them. **CN01** states that: *“All new development proposals will be required to be of appropriate scale,*

form, detailed design and construction materials for the location” it goes on to say: “Proposals must pay particular attention to the scale, form and nature of adjacent development and the environment surrounding the site”

The existing Marquis premises are constructed to a high specification as would be expected of a boutique hotel and there is little doubt that this level of quality would be upheld should planning be granted. However, as referenced above in **CN01** of the Babergh Local Plan, the scale and form are required to be appropriate to the location, both in terms of adjacent development and within the environment in which it is located.

The proposal seeks to increase the size of the Marquis to 2200sqm [an increase of 139%] which is of a size and scale not in proportion to either the adjacent development on Upper Street or the environment within which it sits.

It is noted that the design and use of the sloping nature of the site has sought to mitigate the scale when viewed from the B1070, as part of the street scene, however, this is not the case when viewed from the westerly aspect across the Brett Vale Special Landscape Area. The size and scale of the Banqueting Hall is also of concern visually as the design is such that this would show as a large structure against the village and rural landscape. The location of the Marquis at the highest point in the village exacerbates the impact of this structure when set against the general street scene of bungalows and period buildings on the western side of Upper Street and we are not convinced that this can be adequately screened when viewed from Lower Layham and Shelly to the West.

These concerns on scale are supported by the consultee comments from the Heritage Officer.

The potential development is in close proximity to neighbouring properties. It is also important to note the concerns of neighbours in the “neighbour comments” in relation to a development of this scale as being suitable for this location. and the impact this development will have on the enjoyment of their homes.

Conclusion: This proposed development does not meet the requirements of Babergh’s Local Plan as its scale is not appropriate to adjacent development or the environment in which it is situated, and the design is not sympathetic to the rural surroundings especially when viewed from the westerly aspect across the Brett Vale Special Landscape Area.

Material Consideration 3: Noise Pollution

There is no dispute that noise levels will increase as a result of the planning application. This is undisputed by the applicant and a report was commissioned and conducted by Sharps Redmore on the 11th January 2020 between 8pm and Midnight. This report was no doubt commissioned to reassure planners and residents that effective noise mitigation measures could be implemented to bring noise levels from weddings within the acceptable standards to avoid noise pollution and nuisance.

- The survey was conducted at a time that in no way reflects the environment of a summer wedding. On a January evening windows and doors would have been closed

and people would not have been out on the terraces. Therefore, measurements taken are irrelevant. They are not a true reflection of the current summer noise levels at the Marquis and make no mention or take any account of the topography of the land that the amplification impact this has across the Brett Vale Special Landscape Area.

- Because of the recognition that noise levels will increase this makes the noise report and mitigations of vital importance to village residents, for reassurance that noise pollution will be mitigated to within acceptable levels and in line with local and national policy and frameworks*. However, reading the Acoustics report there are inaccuracies between the text on pages 10, 11 and 12 and the reference tables. It is disappointing that these have not been picked up and referenced by Babergh Environmental Health.
- The report highlights “self-policing” mitigation measures which are also recommended by Babergh Environmental Health. These include the submission of a Noise Management Plan, Perimeter Noise Monitoring of each event or restrictions on amplified music outside of the approved building. Currently the management at The Marquis fails to self-police noise levels impacting on residents’ enjoyment of their properties. A wedding in June 2019 elicited complaints on unacceptable noise levels from across Upper and Lower Layham – however despite the concerns raised with the management at the time they made no attempt to mitigate the noise.
- The technology referenced in the report which is designed to mitigate the internal noise levels is welcomed, however, most weddings take place in the summer and warmer months and the building is designed to have large opening doors onto a terrace for the enjoyment of wedding guests. The noise levels in the evenings especially of up to 120 wedding guests enjoying the terraces and gardens cannot be mitigated by technology
- The application references 30 weddings per annum, however, it makes no reference to the number of other events. If the new venture is successful the lack of limitation on the total number of events that can be held on the premises means potential constant impact for residents in Layham.

**National Planning Policy and Framework [revised 2019]; DEFRA Publication “Noise Policy Statement for England”; British Standard 8233:2014; World Health Organisation “Guidelines for Community Noise”*

Conclusion: The inclusion of a wedding venue has the potential to seriously impact negatively a quiet, rural Special Landscape Area. The position of The Marquis on the ridge of the valley amplifies the noise levels and the report commissioned to reassure residents and planners of the ability to mitigate noise levels is flawed with inaccuracies and conducted at a time that is not a true reflection of noise levels from the existing premises. There are also real and proven concerns, from residents, that the management at the Marquis will be committed to applying the “self-policing” mitigation measures highlighted in the report or as conditions advised by Babergh Environmental Health.

Material Consideration 4: Environmental Matters

The Babergh and Mid Suffolk **Joint Local Plan** identifies Layham as a Hinterland Village. It states that development within Hinterland villages will be permitted within settlement boundaries if certain conditions are met. However, the majority of this planning proposal is outside the “built-up” boundary of Upper Layham and therefore does not meet the requirements within the Joint Local Plan.

Chapter 6 of the **Babergh Local Plan** references **Countryside and Rural Economy – CR01** refers to the *“protection of the quality and character of the countryside by restricting development to that which is essential for the efficient operation of agriculture, forestry and horticulture and for appropriate outdoor recreation. In particular, development such as filling stations, hotels, indoor sports facilities, catering establishments, garden centres and sales areas will **not** be permitted in the countryside.”* Where development is permitted in the countryside it must meet certain criteria set out in the local plan.

Should Babergh override its own policy on development and permit development outside the “built-up” boundaries of Layham, as a Hinterland Village there are additional requirements that proposed developments need to meet, including:

- High standard of hard and soft landscaping, appropriate for the location
- Commitment to the protection of hedgerows and treelines

We note the recommendations by Andrew Hartings Landscape Consultants, in the Landscape Appraisal Report and the detailed planting set out in the KLH Design Statement and if these were implemented in full the potentially negative visual impact would be largely mitigated in 10 years. However, the quality and type of hedges, trees and shrubs should be much more clearly identified in a full planting plan, as currently there are several different representations of planting that leave considerable room for variation. It is critical to ensure minimisation of impact on the natural environment in line with Government Policy on protecting and enhancing the natural environment and the **National Planning Policy Framework** is clear that plans should recognise the intrinsic character and beauty of the countryside. Therefore, the use of indigenous hedgerows and hedgerow trees and the avoidance of ornamental plant material over most of the extended site, is crucial to ensure the best chance of successful integration into the rural landscape over time. This should also be supported by a detailed maintenance schedule.

The proposed development is also situated within the Brett Vale Special Landscape Area – which impose limitations set out in Babergh’s own policy documents. Meaning the development as a whole can only be acceptable if it can be demonstrated that there will be no adverse impact. This a rural area and the development will result in the loss of a significant parcel of agricultural land to accommodate the development. Therefore, having an adverse impact in environmental terms and in the eyes of many Layham residents

It is also noted that there is an unresolved issue from SCC Flood and Water Engineers relating to drainage arrangements.

Conclusion: This development is outside the “built-up” boundary of Upper Layham, results in the loss of agricultural land and is set within the Brett Vale Special Landscape Area. It therefore does not adhere to Babergh’s own policy on development in Hinterland Villages, it

does not meet the requirements of development in the countryside which is restricted to essential development and prohibits facilities such as hotels. Being within the Brett Vale Special Landscape Area it must adhere to the additional limitations in Babergh's own policy documents where any development must demonstrate that it has no adverse impact and the impact of the proposed development is noted within this objection from Layham Parish Council. For the reasons given above this development would be in breach of the guidance issued in Babergh's own policy.

In relation to the landscape design, although the general design is praised and proposals indicate that the number of hedges, trees and indigenous species will be increased, there is insufficient commitment in the form of a full planting plan, to ensure that the requirements to protect the quality and character of the countryside as defined in **CR01** or in line with Government policy on protecting and enhancing the natural environment.

Material Consideration 5: Parking

We object to this planning application on the basis of the lack of parking both in number of spaces and availability of suitable parking for a wedding / event venue.

The applicant acknowledges that there must be sufficient parking onsite to accommodate the cliental of the proposed development. Rightly noting that parking on the B1070 is not an option stating "that the rural location of The Marquis is such that there is NO tolerance for on road parking and all visitors' vehicles must be accommodated on site". However, the parking provisions contained within the planning application do not adhere to the requirements outlined in **Suffolk County Council's Parking Advice** on number of spaces, or parking guidelines, as follows:

- Applying the calculations within the SCC guidance for a venue with this mix of amenities results in the need for 200 parking spaces and not the 102 detailed in the planning proposal. Even making reasonable adjustments to reflect the reality that some guests will be accessing more than one facility at the premises, this mitigation still results in a calculation of 158 car parking spaces – 56 more than proposed. Inadequate parking would result in guest, attempting to find alternative parking on the B1070 or in residential roads and private roads such as Old Orchard. This would not only have a negative impact on local residents' enjoyment of their properties, but could restrict access for emergency vehicles in narrow roads, and also impact on safety of road users on the B1070. **Note:** Please see attached calculations
- Increasingly weddings, especially when held at rural locations, put on coaches to transport guests this enables guests to have a drink and removes the temptation for drink driving. The application makes no provision for coach parking or a defined space for coaches to pull into the premises and manoeuvre. Without this facility the only option is to drop off and pick up on the B1070 which would have an adverse impact on the safety of guests and other road users on this narrow road. This omission is also referenced in the Suffolk Highways response to the application.
- The application references the use of pushbikes as a means of transport but there appears to be no provision for the safe parking or storage of cycles. SCC parking

Guidance provides calculations of bike parking requirements per sqm of floor space, and that parking for cycles must be secure, overlooked, covered and lit where appropriate to improve security and encourage use by staff and visitors. So, although mentioned in the application no provision has been made to facilitate the use of cycles.

- SCC parking guidelines also specify the requirement to have at least 15% of parking spaces for A3 and A4, and 25% for C1 types of businesses to be fitted with an electrical charging system and the infrastructure to be fitted to a further equal percentage of spaces for future use. No mention is made in this planning application on the provision of these facilities or how this will be achieved.
- Currently deliveries are made to the Northern end of the premises with large lorries half on and half off the B1070. The wedding venue and wellness spa will further increase these deliveries. Reviewing the planning application, no reference has been made in relation to increased deliveries and no thought into how this will be managed on premises evidenced in the application. Should Babergh override their guidelines and approve this application then consideration should be given to safe deliveries on the premises

Conclusion: This development does not adhere to the SCC guidance in relation to parking requirements providing significantly fewer parking spaces than are needed to support a venue of this scale and diversity. Transport to the venue is reliant on cars and the planning application makes no provision for onsite parking of alternative methods of transport e.g. bicycles for staff and visitors or coaches for wedding parties and other events. There is no provision for “green transport” as defined in SCC guidelines in the form of electrical charging points.

Material Consideration 6: Traffic

The applicant commissioned a specialist company to conduct a speed survey on their behalf in support of the planning application. This survey was conducted at off peak times only and presented data of 29 and 29.5mph. However, this limited survey is not a true reflection of the speed of motorists on the B1070.

Between the 1st and 8th October 2019, the Parish Council Commissioned a speed survey conducted by Suffolk Highways in response to longstanding concerns from residents as to the speed of traffic in the 30mph zone of the B1070 and subsequent accidents along this stretch of road. Radar technology was placed at two locations in the village on the B1070, one of these locations being very close to the new proposed entrance contained within the planning proposal. This survey was conducted 24 hours a day across the 7-day period in question. This survey produced the following data:

- At the new proposed entrance position the 85% percentile Southbound was 41mph and Northbound was 37mph above both the speed limit and the data presented as part of this planning application. Speeding data also showed some vehicles travelling at 60mph in this 30mph zone. Thus, demonstrating that the applicants restricted surveillance to limited off peak times is thus inferior to the official Suffolk Highways survey and does not reflect the traffic conditions on the B1070

- The applicant also quotes road trip generation figures, which although potentially acceptable if staggered across a period of time, are a concern and a potential danger when concentrated to the start and end of a wedding event. From the Suffolk Highways survey on Saturday 5th October only 70 vehicles were recorded on the B1070 between 23:00 and 24:00 hours. A wedding venue of this size could potentially double these figures with an additional 70 vehicles travelling through a normally quiet sleeping village.
- This is compounded by a fundamental change in the concentration of traffic with circa 70 cars turning off and onto the B1070 at the same time. With the reference to the speeds mentioned above, coupled with the narrowness of the road, this raises safety concerns for road users. This is compounded at night when the road is unlit and being used by people unfamiliar with the road.
- The increase in concentrated traffic movements is also a concern for the intrusion on near neighbours to the enjoyment of their properties. Increased noise levels, light pollution and the loss of privacy must be mitigated within this application with adequate application of noise monitoring during these peak times and also the use of shielding and planting to avoid overlooking and appropriate lighting to minimise light spread – all material considerations within planning policy.

Conclusion: The traffic survey presented in support of this application does not reflect the reality of traffic usage and speeds on the B1070. This is clearly evidenced by the more comprehensive speed survey conducted by Suffolk Highways and commissioned by the Parish Council in response to known and longstanding concerns regarding speeding into and out of the village at The Marquis site. We object to this planning application in relation to the safety of road users and the increase in traffic.

Material Consideration 7: Light Pollution

The **Ministry of Housing, Communities and Local Government** states that planning needs to address artificial lighting needs when a development may increase the levels of lighting. It needs to ensure the right light in the right place and for it to be used at the right time so it does not cause “light pollution” or “obtrusive light” so as to cause annoyance to people, be harmful to wildlife or undermine the enjoyment of the countryside or night sky.

The **Department for Environment, Food and Rural Affairs** also counts as a statutory nuisance, artificial light that *“unreasonably and substantially interferes with the use or enjoyment of a home or other premise”*

This proposed development is situated within a village setting where the only significant light pollution comes from the existing Marquis site. This is essentially a dark village with no street lighting, the only lighting coming from village residences, and backs onto the Brett Vale Special Landscape Area. This results in real concerns regarding the impact of lighting, particularly, but not exclusively, to the external lighting arrangements including those for the proposed carpark.

When the initial refurbishment took place of this property, the Parish Council then had concerns about the amount and impact of the lighting involved with such a development. We engaged with the Planning Department after the plans were passed in an endeavour to reduce the effects of this lighting – due to the impact on the surroundings. Subsequently, the layout has altered over time, but, even in its present state, the light pollution from the Marquis is evident in this village location.

Within the submitted plans there are no specifications for the type of lighting or their positions, except for a reference to Environmental Health regulations on Noise/Odour/Light and Smoke which quotes: “any external lighting associated with the development shall be kept to a minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation” Reason – to minimise detriment to nearby residences. The Design and Access Statement submitted with the application also has reference to lighting but there is no detailed Lighting Plan to enable an assessment to be made on the mitigation of light pollution.

Lighting schemes can be costly and difficult to change, so getting the design right and setting appropriate conditions at the planning stage is important. The District Council’s policies **RE.08, RE 11**, and particularly **RE 28** which requires the District Council to *“have regard to road safety, residential amenity and noise, light emission or other intrusive characteristics which would detract from residential amenity and quiet enjoyment.”*

Our parish is situated in relatively unspoilt countryside and this planning application is of gargantuan proportions in relation to the surrounding area. Laying at the southern end of the village within the view of the Brett Valley and within the Brett Vale Special Landscape Area, the light pollution is extensive. Therefore, particular attention should be given to the impact and therefore potential of light pollution.

Conclusion: The Parish Council, based on past and existing experience, are concerned about light pollution and the affect it would have on a considerable part of the Brett Valley. Government Policy stipulates the requirement to ensure that artificial light does not cause annoyance to people or adversely impact the natural environment. The lack of a Lighting Plan, including the position, type and timing of lighting means that a proper assessment of adherence to Government Policy is not possible, nor is it possible to understand proposed mitigation measures to ensure that any artificial light does not cause a statutory nuisance. Without this level of detail, and in light of previous issues and past history in relation to light pollution at these premises, the requirement for a detailed lighting plan and conditions set to ensure compliance, is critical.

Material Consideration 8: Impact on Amenities

It is an important consideration that the local amenities are not adversely impacted by the development proposals. In 2019 residents of Upper Street were affected by raw sewage in their gardens and properties, where it had come up out of their toilet, and an emergency

call was made to Anglian Water. On investigation the blockage, which took 9 hours to remove, was caused by a massive fat burg. At the time the engineers advised that it was “highly likely” that this came from an industrial kitchen.

If Babergh overrides its own planning guidance and approves this application then due consideration should be given to ensuring that the local sewage infrastructure is adequate and drainage issues addressed as a requirement of this planning application.

Conclusion

As summarised in the Executive summary Layham Parish Council object to the planning proposal based on the Material Considerations documented above, considerations that should be taken into account when deciding a planning application. We have also noted the “neighbour comments” both submitted to Babergh District Council as part of the planning process and expressed at the public forum during the Parish Council planning Meeting on the 18th May 2020 – “neighbour comments” also being a Material Consideration. We therefore conclude that any potential economic benefits are in conflict with the residential and environmental amenity of Layham and therefore this planning application should be refused on the basis that it does not adhere to Babergh Planning Policy.

Babergh District Council Planning Application

DC/20/01517

The Marquis Upper Layham

Observations from Layham Parish Council relating to Environmental matters

Babergh Council will be fully aware of the fundamental facts that, firstly, much of this proposed development is outside the ‘built-up boundary’ of Upper Layham and, secondly, is within the Brett Vale Special Landscape Area. These two facts impose limitations set out in Babergh’s own policy documents – thus the development as a whole can only be acceptable if it can be demonstrated that there will be no adverse impact. The loss of a significant parcel of agricultural land and the doubling in size of the restaurant/hotel in a rural situation may represent ‘adverse impact’ in environmental terms and certainly does in the eyes of many Layham residents.

Another fundamental issue is that drainage arrangements are not fully resolved – as set out in the submission by SCC Flood and Water Engineer.

Similarly, used water disposal has not yet been settled with Anglia Water. Note should be taken of observations from nearby residents who believe that the sewerage piping running through their properties is not robust enough to cope with the extra load.

In the unlikely event of Babergh Council overriding its own guidance and the project given the green light, it is important that we have lodged our concerns that everything possible is done to integrate the development, particularly the car parking areas, into the existing landscape. If the recommendations by Andrew Hartings Landscape Consultants, in the Landscape Appraisal report and the detailed planting set out in the KLH Design and Access Statement, were to be implemented, the potentially negative visual impact would be largely mitigated probably within ten years.

However, the quantity and type of hedges, trees and shrubs should be much more clearly identified in a planting plan – as a commitment. At present the several different representations of planting leave considerable room for variation.

The use of indigenous hedgerows and hedgerow trees and the avoidance of ornamental plant material over most of the extended site, is critical, to give the best chance of successful integration into our rural landscape over time. It is vital that the mature riverside trees are retained and possibly augmented – they are particularly important when viewing the area from the west.

Finally, a detailed maintenance schedule should be submitted alongside the detailed landscape design commitment.

We ask that careful consideration is given to our observations before plans are finalised, should this project be permitted.