PLANNING STATEMENT ADDENDUM



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ERECTION OF NINETEEN HOLIDAY LODGES, RECEPTION BUILDING, FACILITY MANAGER'S ACCOMMODATION AND MAINTENANCE SHED. FORMATION OF TWO FISHING LAKES AND ASSOCIATED HARD AND SOFT LANDSCAPING. BLEU RAY FARM, MILL GATE, WHAPLODE PE12 6RY

CLIENT ; VMM PROPERTIES LIMITED

DATE ; January 2024

PROJECT REF ; JDA/2022/885

This document is part and parcel of a Full Planning Application submitted to South Holland District Council – reference number H23-0471-23.

1.0 Introduction :

It is the purpose of this supplemental report to provide further information to the LPA following correspondence from the Case Officer in December 2023. The further information requested relates to the requirements of Policy 20 of the Local Plan and the benefits to tourism that would arise from the proposed development.
*In terms of the latter, we have included further information regarding the socio economic benefits of the construction phase.

POLICY 20 ASSESSMENT

The following assessment sets out the Applicant's position regarding Policy 20 of the East Lincolnshire Local Plan adopted in March 2019 Due for review in 2024) – Policy content repeated below in whole :

East Lincolnshire Local Plan. Policy 20.

5.12. Accommodation for Gypsies, Travellers and Travelling Showpeople

5.12.1 In Planning policy for traveller sites, 2015[46], the Government identifies that its 'overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life for travellers while respecting the interests of the settled community'. It goes on to identify that it expects Local Plans to:

- be based upon robust evidence of the likely accommodation needs of gypsies, travellers and travelling showpeople;
- set targets to meet these needs;
- identify enough sites to accommodate at least the first ten years' needs; and
- set out criteria to guide land supply allocations and decisions on planning applications.

Policy 20: Accommodation for Gypsies, Travellers and Travelling Showpeople

The redevelopment or change of use of an Existing Residential Gypsy/Traveller Site or Existing Residential Travelling Showperson's Site (as identified on the Policies Map) will be permitted only if an assessment has been undertaken which has clearly shown that the site is no longer required to meet the accommodation needs of the Gypsy/Traveller or Travelling Showpersons communities.

Between 2011 and 2036, evidence suggests that, in South East Lincolnshire, there will be a need for the provision of:

- 4 new permanent residential pitches for gypsies and travellers; and
- 1 new permanent residential plot for travelling showpeople.

This need will be met through the development of the sites identified on the Policies Map and listed below:

• **Land at The Stables, Baulkins Drove, Sutton St James** allocated as a 'Proposed Residential Travelling Showperson's Site', to provide accommodation for one additional household; and

• **Land at Bleu Raye Farm, Mill Gate, Whaplode Fen** allocated as a 'Proposed Residential Gypsy/Traveller Site', to provide accommodation for four households.

Planning permission will be granted for the development of these sites, provided that proposals:

1. will be adequately provided with appropriate infrastructure such as electricity, drinking-water, waste-water treatment and recycling/waste management;
2. will not have a significant adverse effect on the amenities of existing local residents or adjoining land users (and proposals must therefore give careful consideration to layout, landscaping, external lighting schemes, and the type of business uses that would be appropriate (if mixed residential and business use is proposed)); and
3. will be successfully assimilated into both their immediate environs and the wider landscape.

Additional needs which may arise during the Local Plan period will be met through the determination of planning applications on other, unallocated sites. Planning permission will be granted for proposals on such sites, provided that they meet criteria 1 to 3 above, and they:

1. provide occupants with an acceptable standard of amenity;
2. are not located adjacent to uses likely to endanger the health of occupants, such as a refuse tip, water recycling centres or contaminated land;
3. respect the scale of the nearest settled community;
4. will not place undue pressure on local infrastructure;
5. will not adversely affect heritage assets or areas of importance to nature conservation;
6. will not prejudice highway safety or give rise to problems of parking or highway access;
7. for sites for permanent residential use they:

   i. provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport;

   ii. are suitable (or capable of being made suitable) for mixed residential and business use;

   iii. are not located within Flood Zone 3a or 3b and, if located in Flood Zone 2, the Sequential and Exception Tests have been passed; and

8. for sites for transit or stopping place use, are not located within Flood Zone 3b and, if located within Flood Zone 3a, the Sequential and Exception Tests have been passed.

Reasoned Justification

2. 5.12.2 Interviews conducted with gypsy, traveller and travelling showperson households for the Boston and South Holland Gypsy and Traveller Accommodation Assessment, 2016 (GTAA)[47] identify that there is a 'known' need for the provision of:
    - 1 residential pitch in Boston Borough and 4 residential pitches in South Holland District for gypsy and traveller households;
    - 1 residential plot in South Holland District for a travelling showperson's household; and
    - no new transit pitches.
3. 5.12.3 It is not considered necessary for the need identified in Boston Borough to be reflected in the Local Plan's targets, because it can be satisfactorily accommodated on vacant pitches on the Redstone Traveller Site in Boston. However, the other 'known' needs translate into the targets set out in Table 4 below.

	Years 1-5 (1 April 2011 to 31 March 2016)	Years 6-10 (1 April 2016 to 31 March 2021)	Years 11-15 (1 April 2021 to 31 March 2026)	Years 16-20 (1 April 2026 to 31 March 2031)	Years 21-25 (1 April 2031 to 31 March 2036)	TOTAL (1 April 2011 to 31 March 2036)
Residential pitches for gypsies & travellers (Boston Borough)	0	0	0	0	0	0
Residential pitches for gypsies & travellers (South Holland)	0	1	1	1	1	4
Residential plots for travelling showpeople (Boston Borough)	0	0	0	0	0	0
Residential plots for travelling showpeople (South Holland)	0	1	0	0	0	1
Transit pitches (Boston Borough)	0	0	0	0	0	0
Transit pitches (South Holland)	0	0	0	0	0	0

Table 3: Pitch and plot targets for gypsies, travellers and travelling showpeople in South East Lincolnshire (1st April 2011 to 31st March 2036)

5.12.4 The GTAA[47] also identifies an 'unknown' need for up to 16 additional residential pitches for gypsy and traveller households (up to 3 in Boston Borough, and up to 13 in South Holland. ['Unknown' needs are those which may arise from gypsy, traveller and travelling showperson's households who were not interviewed by the GTAA consultants.] This 'unknown' need will be met by determining planning applications, taking into account the provisions of the NPPF[9], Planning policy for traveller sites[46], and the policies of this Local Plan (in particular Policy 20).

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4.00 The Boston and South Holland Gypsy and Traveller Accommodation Assessment (GTAA)

The GTAA is not a recent document and its findings are partly based on estimations of need. Given the verbiage in Appeal Decision in APP/A2525/W/22/3300517, recent consents and subsequent comments from the Head of Planning, we do not believe that this document carries much if any weight in the determination of H23-0471-23.

This document was produced in November 2016 by ORS and is attached to this emailed Report to the Case Officer in full.

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3.00 Relevant decisions since the adoption of the Local Plan

Since adoption in March 2019, there have been a number of decisions that affect the applicability and current robustness of Policy 20 and, therefore, it's relevance to the current Full Planning Application H23-0471-23 .

In particular, we would draw attention to the following :

H09-0010-21

Proposed 4 traveller pitches for family linked with pitch No.6.

Rear Of 6 Rose View Drive Holbeach Spalding

Approved on the 4th of May 2021

Whilst the description makes reference to the 'link' with the family of pitch no.6, there are no Conditions relating to 'occupancy restrictions', therefore this permission in essence gives Full planning Permission for the development of 4no

'Traveller Pitches'. The approved site layout describes a form and scale of development approved at Bleu Ray Farm under H23-0848-19.

Section 7.2.2 of the Officer's Report concludes that "….a further 7 pitches are required for new household formation….."

This approved development will provide for four pitches.

4 pitches

H09-0087-22

Change of use from paddock to residential use for Gypsy and Travellers(retrospective) to include 2 static caravan pitches, and associated touring caravans - re-submission of H09-0845-21

Land To The Rear Of Emmanuel House, Main Road, Holbeach Drove, Spalding PE12 0PS. Applicant Mr G. Carman.

Approved on Appeal on the 31st October 2022 - APP/A2525/W/22/3300517

The Inspector made the following comments under paragraph 13 ;
The evidence provided on planning permissions indicates that the Council can demonstrate a supply of five years' worth of sites against the need identified in the GTAA. However, it does not follow that any further proposals that come forward would be contrary to the provisions of the LP as no maximum number of pitches is identified within any policy. Also, I am mindful that the GTAA is not a recent document and its findings are partly based on estimations of need. In light of these factors, I am unconvinced by the Council's claim that there is sufficient sites with planning permission to address all the accommodation needs of Gypsies and Travellers in the district.

This approved development will provide for two pitches.

2 pitches

H20-0513-20

Residential gypsy caravan site for one family with 2 caravans (retrospective) - approved under H20-0287-06. Modification of Condition 1 to allow the name on the planning approval to be changed to Ms West

THE STABLES, 88 BAULKINS DROVE, SUTTON ST JAMES, SPALDING PE12 0JU

This approved development will provide for one pitch.

1 pitch

H14-0419-22

Use of land for the stationing of caravans for residential purposes, together with the formation of hardstanding and utility/day room ancillary to that use

Land North Of Gatehouse 86 Langhole Drove Pinchbeck Spalding. Applicant Mr T. Connors.

Appeal Reference: APP/A2525/W/22/3313700. The Appeal was uncontested with the application approved on the 8th of March 2023.

In the report to the Planning Committee on the 8th March 2023, the development manager made the following comments ;

3.3. With regard to NEED, having reviewed the recent appeal decisions it is the considered view of the external legal advisor that it is now extremely difficult for the Council to object on the basis of need, without an updated Gypsy and Traveller Accommodation Assessment (GTAA) being undertaken. Each of the recent three appeal decision notices specifically addressed "need" and all three Inspectors concluded that there was an unmet need in the District based on the outdatedness of the assessment, the high number of unknown households and the fact that Local Plan policy does not place an upper limit on sites.

3.8. In concluding, the external legal advisor remarks that in summary his advice to the Council is that without a change to the evidence base, it is now extremely difficult to object to future applications/appeals on the basis of need.

5.1. The recent appeal decisions are material to current and future applications for Gypsy and Traveller accommodation. The clear legal advice is that to pursue a refusal on the basis of need is now difficult. It would likely be seen as unreasonable to continue in this vein.

In advising the Planning Committee, the Head of Planning – Phil Norman said ; "The lead argument is very much gone."
"On this one the Environment Agency have changed their position. I'm in more detailed conversations with them about how we apply this across the board."

This approved development will provide for one pitch.

1 pitch

H02-1174-19

Proposed static and touring caravan park, including new toilet block and access road

Bridge Inn Caravan Park, Common Drove, Crowland, Spalding PE6 0HJ

Appeal Ref: APP/A2525/W/20/3249950

Whilst this application was refused, the only material reason for said dismissal related solely to 'flood risk'.

H06-0233-19

Change of use of land (part retrospective) to provide five additional gypsy/traveller pitches with one day room per pitch and existing stables converted to dayrooms. Also, erection of one new store and retention of sheds for pitch 1, with construction of internal road to facilitate separate ingress and egress to and from the site, including hardstanding

GREEN ACRES PARK ROPERS GATE GEDNEY SPALDING

Approved 5th September 2019

This approved development will provide for five pitches.

5 pitches

H23-0841-20

Foxes Lowe Hurdletree Bank Whaplode St Catherine Spalding

Change of use from paddock to travellers site for applicants' and family only (part retrospective)

Approved on the 18th December 2020.

This approved development will provide for one pitch.

1 pitch

H16-0932-20

Oak Tree Meadow, A16, Spalding

Caravan site for one traveller family (3 caravans), with associated hardstanding, cesspit drainage and portakabin/dayroom (retrospective)

Approved on the 26th January 2021

This approved development will provide for three pitches.

3 pitches

H08-1133-20

Travellers Lodge Beck Bank Gosberton Clough Spalding

Approved on the 27th January 2021

This approved development will provide for two pitches.

2 pitches

H06-0233-19

GREEN ACRES PARK ROPERS GATE GEDNEY SPALDING

Change of use of land (part retrospective) to provide five additional gypsy/traveller pitches with one day room per pitch and existing stables converted to dayrooms. Also, erection of one new store and retention of sheds for pitch 1, with construction of internal road to facilitate separate

ingress and egress to and from the site, including hardstanding

Approved on the 5th September 2019

This approved development will provide for five pitches.

5 pitches

H16-0734-19

Akita Place Clay Lake Spalding Lincs PE12 6BL

Siting of mobile home (retrospective) - re-submission of H16-0030-17

Approved on the 10th of October 2019.

This approved development will provide for one pitch.

1 pitch

4.00 Current applications

H06-0532-23

Change of Use of Agricultural Land to Provide 5 Gypsy/Traveller Family Pitches Each having a Static Mobile Home, Dayroom, Parking for a Tourer and 2 Vehicle Spaces together with a Treatment Plant, the Laying of Hardstanding and Associated Ancillary Works - re-submission of H06-

0216-23 (part retrospective)

Land at The Orchards Blazegate Gedney Spalding

Status. - Undecided

*JDA Commentary ;

Given recent decisions, it seems likely that this application will be approved.

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5.00 Summary

Recent approvals (post have given permission for 25no pitches. Additionally, the relevance of the GTAA has been brought into question – it not a recent document, doesn't identify the maximum number of pitches required and its findings are partly based on an 'estimate of need'.

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6.00 Conclusions

It is evident from the quantum and nature of pitches approved since the allocation of the site at Bleu Ray Farm in 2019, that sufficient facilities have been granted Planning Permission to satisfy the targets set out in the 2016 Boston and South Holland Gypsy and Traveller Accommodation Assessment (GTAA).

Furthermore, we say that the intent Policy 20 and the content of the GTAA have been overtaken by recent consents and do not, therefore represent a determining factor in relation to H23-0471-23.

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TOURISM

7.00. The Socio Economic Benefits Arising from the Proposed Development

In terms of the applicable Local Plan 'policy requirements' that cover tourism, of particular relevance is **Policy 9: Promoting a Stronger Visitor Economy** which states the following ;

> Proposals for tourism and visitor development which utilise and enrich the natural and built environment and existing attractions of South East Lincolnshire to the benefit of the local economy, visitors and local communities will be supported within the boundaries of settlements identified in Policy 1.
> Outside these settlements, small-scale development to support the visitor economy, including farm diversification, equine development and fishing lakes, will be supported provided that proposals:
> 1. do not conflict with neighbouring land uses;
> 2. are in keeping with the character of the locality; and
> 3. demonstrate a functional link with an existing rural attraction or farm enterprise.
>
> Larger developments will only be supported outside settlement boundaries in exceptional circumstances, for instance to proportionally support or enhance the enjoyment of an established visitor attraction where this cannot reasonably be achieved from a town or village location.
> Springfields Shopping and Festival Gardens
> Development within the Springfields Shopping and Festival Gardens, as defined on the Policies Map, will be supported in principle for:
> 1. facilities directly related to the functioning of the shopping centre, consistent with Policies 24 and 27;
> 2. development at the Events and Conference Centre that seeks to improve the range of services available; or
> 3. proposals which would enhance the scale, quality and biodiversity value of the Festival Gardens.
>
> Other ancillary development linked to the above uses will also be supported.

The latest version of the NPPF (Dec 2023) covers the rural economy under section 88 as follows (our emphasis in **blue** bold text) ;

> Supporting a prosperous rural economy
> 88. Planning policies and decisions should enable:
>
> a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
>
> b) the development and diversification of agricultural and other land-based rural businesses;
> **c) sustainable rural tourism and leisure developments which respect the character of the countryside; and**

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

89. Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

The proposals are also in accordance with the general thrust of Policy 9 of the Adopted Local Plan and paragraph 89 of the NPPF which support tourism and visitor developments in the countryside that benefit the local economy provided there is no conflict with neighbouring land uses, are in keeping with the local character and setting. The proposal will deliver high quality holiday let lodges which, in accordance with the Core Strategy will satisfy the high local demand for tourism. The **single storey** properties are designed to be adaptable to the needs of the elderly, infirm or disabled.

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8.00. Overview of the Specific Sector – Short Term Lets (STLs)

Due to travel restrictions imposed during the Covid-19 pandemic, the market for British holidays has grown, resulting in an increased demand for holiday properties in many areas across the UK.

Demand for short-term rentals

Following a period of rapid growth, total nights in STLs in the UK reached almost 148 million in 2019 Overnight stays are not evenly spread across the UK, with the likes of the South West, Scotland, London and Wales accounting for almost 60% of nights. However, pockets within all regions still benefited from this increased demand, whether that be the holiday let owners or local economies.

Unsurprisingly, the disruption created by the pandemic led to a dramatic initial fall in activity in 2020, with nights spent in accommodation reducing by 63% compared to 2019, but the market rebounded relatively quickly thanks to the staycation boom that followed.

There are a number of reasons for this quick rebound, including the introduction of foreign travel restrictions which made UK accommodation options more attractive in general, as well as the changing consumer requirements which meant that STLs were the safest travel option.

As a result of this latter point, the STL market reported a faster recovery than all other UK accommodation types, with the number of nights spent in STLs in 2021 already back up to

90% of 2019 levels (Figure 2). STLs also doubled their market share between 2019 and 2021, which not only highlights the demand for STLs, but also shows the importance they played in propping up domestic tourism during the height of the pandemic.

UK tourism spending and the role of short-term lets

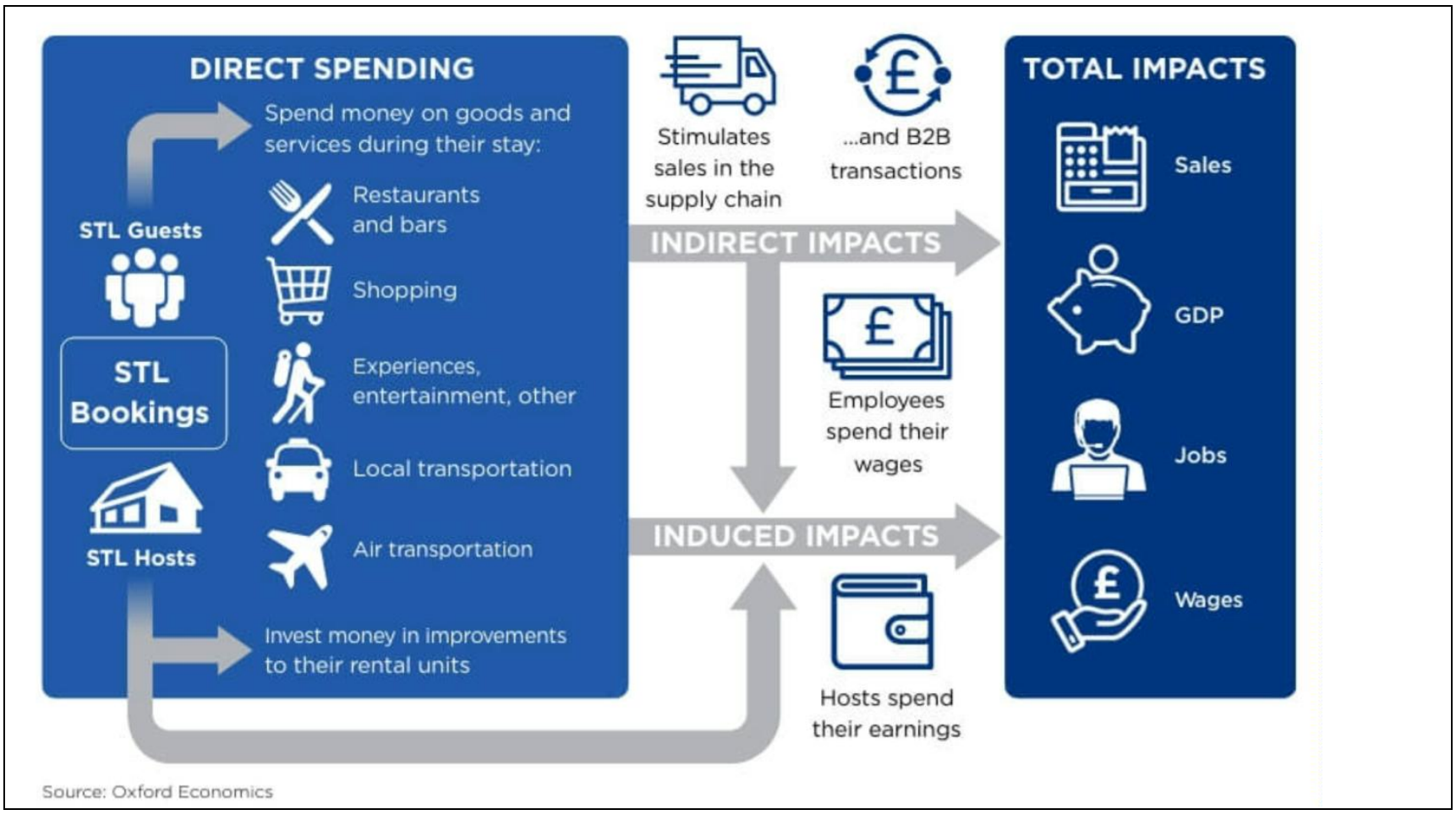
The economic impact associated with STLs goes further than the booking fees, with additional economic benefits for the immediate area supported through guest spending.

Looking at 2019 as a typical year (Figure 3), more than half of total visitor spend was allocated to the accommodation itself, with 56% going directly to the host. In monetary terms this generated £14.2 billion in revenue across the whole of the UK that year. Meanwhile, the retail and the food and beverage sectors were other large beneficiaries of visitor spend in 2019, making up 22% and 11%, respectively – a composition that didn't change significantly during the pandemic either.

Economic Footprint

Contribution to GDP

The economic impact of STLs in the UK spans both the direct spending of the hosts and guests in the area surrounding the holiday let, alongside the indirect or so-called induced contributions that stem from the economic activity along the supply chain of this spending – whether that be the wholesalers that produce the items hosts spend money on, or the employees they pay to run their let.



STLs truly are the economic lifeblood of many parts of the UK, driving spending, providing direct employment and supporting local businesses alike. Moreover, the relative importance of the STL market is proportionately largest in regions of the UK where there is a lower-than-average household income, meaning it is an even more vital source of GDP for these areas.

Potential effects on the local economy and job creation caused by construction and operation of the holiday park.

- There is a potential for local firms, suppliers, consultants and workers to be contracted for the construction activities;
- There is the potential for direct or indirect local employment by the site and its facilities;
- The local economy, firms and workforce could potentially benefit from direct expenditure by the holiday park;
- The local economy, firms and workforce could potentially benefit from the expenditure of visitors to the holiday park in the wider economy;
- Local firms and the workforce benefiting from the activities of the holiday park could potentially in turn increase their expenditure to the benefits of local firms and employment.
- Potential effects on tourism could vary from holiday makers having the opportunity to base their leisure activities in the area due to the implementation of the facilities;
- The high quality and modern nature of the facilities may attract more affluent holiday makers with stronger spending power;
- The site may have a beneficial impact on the wider economy and its employment sector with the holiday makers visiting local attractions and spending at local business premises.

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9.00. Construction Phase benefits to the local economy

The construction of the lodges represents a medium sized construction project within the district, especially within the Spalding area.

The construction investment will take around 22 months. Facilities will involve investment in the local area and will, therefore, create an opportunity for direct and indirect economic benefits. Opportunities will be taken to maximise the use of local labour sources which will provide a positive effect on the local economy and employment.

There will be opportunities for local businesses to benefit either by directly supplying plant and materials to the project or indirectly from the spending of its workforce on the local economy.

The construction of the lodges will create employment opportunities. Based on professional knowledge and experience of holiday let accommodation and construction the build will employ between 5 and 6 FTE.

Given the scale of the proposals and the associated construction activities and employment opportunities this effect is assessed as beneficial and material.

Construction Phase – Construction

The construction will be a small construction project for the local area and will employ between 5 and 6 construction workers as well as professional consultants.

Construction Phase – Manufacturing

A number of elements of the construction will be prefabricated off site. Elements will be sourced from specialist suppliers and manufacturers. While local and regional manufacturers are expected to benefit from the need for other materials needed for construction.

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10.00. Assessment of Potential Community and Social Effects

Construction Phase
During the construction phase there is a potential for local receptors to be affected by construction activities; predominantly relating to transport, noise and air quality and it is therefore considered that these potential affects have been assessed as part of the planning application the result of which consider the affects to be negligible.

Construction – Local Economy

The sourcing, where possible, of local contractors, suppliers, materials and labour will contribute to the local economy and generate local jobs.

Construction – Local Receptors
It is considered that the construction impacts on the proposal will have a negligible impact on receptors and this has been identified within the accompanying planning reports that form part of the application.

Operational Phase
The additional chalets will provide the local community with increased access to the countryside as well as sources of recreation and leisure activity.

Operational – Local Economy
Use, where possible, of local labour and suppliers in the day to day running of the holiday park.

Operational – Tourism, Construction and Manufacturing
Tourism: Highest quality of facilities and environment for visitors to the holiday park.

Operational – Community and Social
The additional chalets will provide the local community with increased access to the countryside and opportunities to use and take advantage of increased overnight accommodation to partake in local recreational and leisure activities.

The proposed holiday lodge site will create a positive boost for the economy from land which is currently unused. The proposal will create a positive GVA and employment opportunities and support the district's tourism industry.

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11.00. Operational Phase

The total turnover of the site with the lodges will be reasonably significant in the local economy and could be expected to turnover in excess of £836,000 when fully occupied (19 lodges). The turnover figure is an approximation taking into consideration the currently advertised weekly prices on the HOSEASONS website. The turnover figure has been worked on the average costing for a 3 bedroomed lodge that is rent out for 52 weeks of the year. This would equate to each lodge generating a turnover figure of £44,000 p/y. The costing has not taken into consideration any additional maintenance or overheads and should only be provided as a guidance for the projected turnover.

The Tourism Alliance considered in its 2007 report that each £1 of turnover generates £0.50 of GVA. Using the ratio of £0.50 of GVA per £1 turnover, the new lodges are projected to generate £110,000 GVA to the general economy 50% of this, £55,000.00 GVA is then anticipated to be the holiday parks additional contribution to the local economy following the completion and operation of the development.

In addition to the full time facility manager, 2 additional full time jobs are anticipated to be directly supported by the holiday park namely:

- Cleaner – 1 x FTE
- Maintenance- 1 x FTE

While these numbers may seem relatively low, these new jobs and income should be considered as an additional benefit to the District's economy.

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12.00. Operational Phase – Local Suppliers

The holiday's parks GVA represents turnover less "outside" purchases of goods and services. The holiday park can, therefore, be expected to purchase £110,000 of goods and services from the wider economy. A substantial proportion of these will be purchased from local firms. Such expenditure with local firms will in turn enable them to generate additional GVA and employment.

The Federation's report and case studies of 2007 estimate that an average of 55% of such purchased goods and services are bought locally. In this instance therefore, it can be estimated that £60,000 of goods and services will be purchased by the holiday park within the South Holland jurisdiction. The turnover of local firms within the area will therefore be increased by £60,000. Using the GVA ratios of the Federation report this will increase the GVA of these firms by £60,000 and support 1 FTE jobs.

Summary of Effects of the Proposed Holiday Lodge Park on the Local Economy

Holiday Lodge Park	GVA	FTE Jobs
Local Suppliers	£60,000	1
Wider Economy	£59,000	-
Indirect Effects	£40,000	-

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13.00. Conclusions

In conclusion, the benefits to local tourism derived from the proposed development weigh significantly in favour of the awarding of planning consent.

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14.00. Position Summary

We have demonstrated that the proposals in this instance will fully accord with relevant national and the adopted Local Plan Policies.

In accordance with Section 54A of the Town and Country Planning Act 1990 and Section 38 of the Planning and Compulsory Purchase Act 2004, we believe that planning permission should be granted and no material considerations indicate otherwise.



John Dickie C. Build E MCABE



