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Burnley Borough Council
Housing & Development Control
Town Hall, Manchester Road
Burnley, Lancashire BB11 9SA
Tel 01282 425011
Email planning@burnley.gov.uk

Mr Jonathan Ainley
Savills (UK) Ltd
12 Booth Street
Manchester
M2 4AW

Date: 6th April 2020
Ref No: PRE/2020/0020
Contact: Janet Filbin
Telephone: 3216

Dear Mr Ainley

APPLICATION: PRE/2020/0020
PROPOSAL: Proposed residential development of around 224 dwellings and associated works
AT: Land at Hollins Cross Farm, Woodplumpton Road, Burnley
ON BEHALF OF: Mr Tom Kay-Shuttleworth

I refer to your request for pre-application discussions, received on 13th January 2020 and to our meeting with yourself, Duncan Wenham, Jay Duffield and Pete Milward (Principal Planner in Planning Policy) on the 3rd March 2020. This letter is to provide a written summary of our discussions.

I understand that your client does not intend to carry out the development of the proposed site but is keen to establish some parameters and have an informed expectation of what is likely to make a successful development of this site. I note that you have already had interest in developing the site from a number of national and regional quality housebuilders which is positive.

The feedback in this letter has been based upon the information that you have to date provided and this includes a site layout (Feasibility Layout 2 – drawing number M4655sk02), a topographical survey (drawing number P19186/1/1RevA), Technical Note on Site Access Options Appraisal, Flood Risk Assessment and Drainage Strategy, Preliminary Ecological Appraisal, Desk top report (Sirius, report reference C8498) and an Archaeological Desk-based Assessment. I have carried out informal consultations with the Council's Environmental Health Officer, the Lancashire County Council Historic Environment Team (for Archaeology), the Council's ecology consultant (Greater Manchester Ecology Unity) and the School Planning Team at Lancashire County Council. I have been unable to consult either the local highway authority or the Lead Local Flood Authority (both at Lancashire County Council) as they provide their own pre-application process which you will need to follow. I would, if you haven't already, encourage you to do this.

The proposed site covers the whole of the site allocation as identified on the Policies Map of Burnley's Local Plan, adopted 31st July 2018. Policy HS1/2 identifies the site at Hollins Cross Farm (8.65ha) as a housing allocation to contribute to the overall housing requirement for the borough of 3,880 dwellings between 2012 and 2032

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(Policy SP2). The residual requirement to be met by site allocations amounts to 1,798 dwellings and 32 sites are identified in Policy HS1 to achieve this. Policy HS1/2 states that this particular site is acceptable for around 184 dwellings. In addition to assessing proposals against other Plan policies, Policy HS1/2 also sets out a number of additional and site specific policy requirements and design principles:

HS1/2 – Hollins Cross Farm

Housing Delivery

The site is acceptable for around 184 dwellings.

Additional and Site Specific Policy Requirements and Design Principles

- 1) A mix of dwelling types, including a minimum of 40% 4+ bedroomed detached and 30% 3+ bedroomed detached or semi-detached houses will be expected;
- 2) Vehicular access should be from a single point onto New Road. Contributions may be sought for off-site highway improvement work in the vicinity;
- 3) No vehicular access will be permitted from Woodplumpton Lane;
- 4) Protected Species have been recorded on the site which also includes Priority Habitat (lowland fen). An ecological survey will be required to accompany any planning application which addresses these issues in accordance with Policy NE1;
- 5) Appropriate landscaping and boundary treatment should include screening to the southern boundary to reduce the impact on the wider landscape. New planting on the site will need to accord with Policy NE3; and
- 6) The presence of known heritage assets (Medieval and earlier) within close proximity of the site would suggest some limited potential for unknown archaeology of local-regional significance and suitable provision will need to be made for archaeological desk based assessment and field evaluation consistent with Policy HE4; and any further investigation or recording works that may be necessary as a consequence of development.

Supporting Information

- 1) This is a prominent greenfield site in the open countryside. A scheme of high quality is expected in line with Policy SP5 and lower density detached housing preferred not only to increase/ provide quality and choice, but lower density development would provide greater opportunity for landscaping, planting and minimising impact.
- 2) Lancashire County Council Highways has advised that access via Woodplumpton Lane would not be considered appropriate as there is no footway provision.
- 3) Contributions may be sought for off-site highway improvement works in the vicinity, both to Glen View Road and for traffic management works to the A646 and Manchester Road signal junction as development is likely to have cumulative impacts on this junction.

The site is the largest completely greenfield site within the housing allocations which signifies its importance to the borough. The Council recognise that the release of a limited number of greenfield sites provides the opportunity to deliver a range of the highest quality of housing that will help to attract and retain economically active residents who will contribute to the long term economic growth and social well-being of the borough. This site is on the edge of the existing built-up area to the southern side of Burnley with good access to employment and amenities. Its location adjacent to Burnley Golf Club and open countryside also make it a very attractive setting for people to live. The key issues for a development on this site will be mitigating the impacts of a built development on such a large area of greenfield land and creating a scheme of the highest quality in terms of the design of its layout, open spaces, landscaping and integration with its surroundings. Given the importance of this site, it will not be acceptable to compromise on quality to allow higher numbers of dwellings or to accept standard book layouts or designs. It will be imperative to the success of any scheme to design a bespoke development, taking into account the unique site considerations, its constraints and opportunities. The development must reflect the greenfield nature of the site and create a characterful development that is distinctive and draws on the best of the character of the local area.

Highway and accessibility

Policy HS1/2 states that vehicular access will be from a single point on New Road with no access permitted at Woodplumpton Road which is due to its narrow unlit condition with no footways. The proposed layout you have submitted indicates a single access to New Road (A646) as the policy expects. The submitted plan indicates a new priority junction with a 6m radius and 60m visibility splays in each direction. At the current time this part of the road is subject to the national speed limit and due to the long and generally straight nature of the road, it is likely that visibility will need to be at longer distances (even taking into account lower speed restrictions by re-locating the start of the 30mph area). I also note that the Technical Note that you have submitted suggests a minimum splay distance of 96m westwards and 115m eastwards which would conflict with this. The swept paths at the new junction demonstrates overlap across lanes and this would suggest that the junction design is inadequate. In view of the amount of traffic that would be generated on this fast moving straight road as well as the proximity of other junctions, I am unsure if the proposed simple priority junction would be appropriate and I would require expert advice on this from LCC Highways. We would consult LCC Highways as part of the application process but you can request their advice at this stage through a pre-application enquiry. In addition, the supporting information at Policy HS1/2 states that highway contributions may be sought for off-site highway works at Glen View Road and for traffic management works to the A646 and Manchester Road signal junction. Early discussion with LCC Highways would allow you to take account of these requirements.

I note that the submitted layout shows that an access road would be maintained to Hollins Cross Farm from Wilkie Avenue. Whilst this is an existing private access road, it is unclear how this could be controlled in the future to prevent other traffic using Wilkie Avenue. I would suggest that these problems could be avoided if Hollins Cross Farm utilise the new access to the site.

It hasn't yet been shown how a development would provide cycle and pedestrian connectivity with its surroundings. Policy IC1 of Burnley's Local Plan requires safe and convenient access for pedestrians and cycles and places each of these at the top of the user hierarchy for seeking opportunities for promoting sustainable travel. There is a network of public footpaths to the east, west and south of the site. Access from the site (north east corner) onto Public Footpath no. 20 (Habbergham Eaves) could be provided, only requiring a short crossing over Woodplumpton Road. Access to Public Footpath no. 14 (Habbergham Eaves) which leads towards Burnley Golf Club could be achieved at the site's north west corner. Pedestrian/cycle access could be achieved from Wilkie Avenue, replacing the existing farm access. There may also be other cycle/pedestrian connections that you can make and all of these would also require liaison with LCC Highways.

Amount of development

Policy HS1/2 states that the site is acceptable for around 184 dwellings which is an indicative figure that has been used to calculate a housing supply of sites to make up the residual requirement at Policy SP2. This figure would give a gross density of approximately 21 dwellings per hectare which is a low density expectation and notably less than the minimum of 25 dwellings per hectare which is normally required (Policy HS3). The lower density in the housing allocation policy (HS1/2) overrides that of Policy HS3 as it has been arrived with some site specific knowledge of the site and with particular site objectives in mind. This refers back to the fact that this is

the largest entirely greenfield site allocation and has been chosen to provide a high quality scheme of housing that will help to attract and retain economically active residents in the borough. I would stress however that whilst this is an indicative figure, the actual amount of development and number of dwellings will also depend on site constraints and mitigation measures. For all of these reasons, I would consider the suggested scheme and layout of 224 dwellings to be excessive and would not provide a quality scheme and is also unlikely to offer suitable scope for mitigation (such as for ecology measures including biodiversity net gain).

Open Space

In respect of open space, for developments, Policy HS4 requires the following:-

- a) **Open Space provision in new housing development**
 - 1) **New housing developments will be required to provide or contribute to public open space provision as follows.**
 - b) **Proposals for 50 dwellings or more will be expected to incorporate recreational public open space to a minimum standard of 0.3 Ha per 50 dwellings or a proportion thereof, in accordance with the Fields in Trust Standard of 2.4 hectares per 1,000 population; or exceptionally, provide or pay a contribution in lieu of part or all of the open space provision for the creation or benefit of existing public open space nearby.**
 - c) **Proposals for new housing developments of between 10 and 49 dwellings will be expected to provide public open space in line with the above standard. Where such a public open space is impracticable or unusable the Council will negotiate with the developer the payment of a commuted sum for the benefit of existing Public open space nearby.**
 - d) **Proposals for new housing development of between 5 and 9 dwellings will be expected to provide the payment of a commuted sum in accordance with the Council's published schedule of fees for the benefit of existing or proposed public open space nearby.**
- 2) **As part of the overall recreational space requirement referred to in 5) above, developers of housing sites comprising predominantly family housing, will be required to provide 0.09 Ha (0.23 acres) of equipped children's play space per 50 dwellings, or proportion thereof.**
- 3) **Where public open space is provided in new housing development, it must normally be a single plot with a minimum functional size of 1,200m² and be overlooked by adjoining properties. It should be landscaped to a high standard of design and the space must be usable, and easily accessible by all residents, including those with disabilities, and provide a safe place to play and relax whilst not causing a nuisance to nearby residents. The type of open space should have regard to the local needs and standards for all types of open space set out in the Council's Green Spaces Strategy.**
- 4) **Landscaping works and the provision of play equipment and its future maintenance is the responsibility of the developer; where public open space is provided on-site, the developer will be expected to fund its maintenance for a period of at least 20 years, or put in place a sustainable scheme of management;**

Please note that the requirement for a minimum of 0.3ha of open space per 50 dwellings does not take into account other needs such as ecology mitigation, which may lead to a higher proportion of open space on site.

The proposed layout indicates very little open space. I note that there are three ponds indicated which may relate to the drainage strategy (although differs from the strategy submitted with this pre-app). The larger pond to the north side of the site is within a depression which appears to naturally lead to flooding and the creation of ponds may therefore be part of a drainage solution. These areas are not however functional in respect of open space and do not contribute to the requirements in Policy HS4. In order to create a quality development, it will be necessary to review the whole provision of public open space to ensure that it is meaningful and leads the design process. I would encourage you to consider a more linear form of open space that connects the site with the open countryside beyond and also connects pond areas to the linear openspace by planting. The open land drain that run from south to north through the site would be natural feature on to which create a linear form of open space. It should also be create views from within the site and the layout of housing should provide for good levels of natural surveillance. Tree planting along estate roads should be given adequate allowance by generous front garden lengths to avoid future overshadowing. Tree planting along estate roads and providing green connections with open spaces would help to create a more verdant appearance that is necessary to make the distinction that this is a greenfield development. Policy HS1/2 refers to the need for appropriate landscaping and boundary treatment, including screening to the southern boundary. I would suggest that a more generous planting edge is required to ensure adequate space for the growth of appropriate native species. Rather than a solid green barrier, I would suggest good quality native planting to provide filtered views of housing in a setback position with fronts of houses facing towards the countryside. I note that the submitted layout does mainly provide for this but without the setback that would be necessary to prevent a harsh built-up edge. A landscaping scheme should be submitted with an application so that the treatment to the southern boundary which creates a new settlement edge can be properly considered.

Equipped play space will also be required in accordance with Policy HS4 (a minimum 0.09ha for every 50 dwellings or proportion thereof). This could be achieved by having a more central area within an otherwise linear form of open space or by having a separate area of open space towards the western portion of the site. It should still be central within the housing area, rather than peripheral and be adequately spaced to avoid noise issues to neighbours.

Ecology

The Preliminary Ecological Appraisal by BWB that is submitted with this pre-app identifies the site as containing marshy grassland, semi-improved grassland with ditches, trees, hedgerows and scrub. It does not contain any nature conservation designations but may contain Habitats of Principal Importance and may also be habitat and/or breeding ground for a variety of protected species. The Ecological Appraisal recommends further botanical surveys and surveys of notable plants (and any invasive plants) between May and September; a breeding bird survey between April and the end of June; bat surveys between April and October; surveys for Great Crested Newts; and surveys for Water Vole between mid April to end of June and again between July and September. All of these surveys and reports to identify appropriate measures in response to the findings of the surveys will need to be carried out before a planning application is submitted.

The Council's ecology advisors have made the following comments:-

‘The ecological report submitted recommends a suite of further ecological surveys that are required for the site. These should be undertaken prior to determination of the application, and the results of the additional survey work should inform the future layout and design of the scheme. The level of required mitigation or compensation measures will also be informed by the results of the additional survey work.

Development proposals should also aim to deliver net gain for biodiversity, so I would also advise that a development of this scheme should aim to achieve this. The DEFRA calculator is a useful tool to guide what would be required from this development to achieve this outcome. Measures to reduce the impact of the proposed development on biodiversity should firstly seek to avoid any impacts, then seek to compensate for any loss within the site. If this cannot be accommodated then off site proposals will be required.’

The mitigation measures that are necessary to safeguard protected species and to provide for biodiversity gain may lead to increased levels of open space for biodiversity purposes. These measures need to be taken into account at the earliest stages of site layout design rather than applied later. A Biodiversity Mitigation Plan will be necessary to be submitted with an application to assess biodiversity net gain.

Design

Policies SP5 and HS4 are both relevant to design and layout matters. In addition, Policy HS1/2 sets out some site specific design principles. As previously stated, there is an expectation that this site will achieve a high quality of design that will create a high quality place to live. A significant part of this will be achieved through the design of the open space and landscaping, but it will also require a suitable layout of roads in perimeter blocks to provide permeability and avoid excessive cul-de-sacs. Legible layouts should provide focal features and landmarks at corners and more structured tree planting along spine roads.

In respect of the actual dwellings, Policy HS1/2 states that there should be a mix of dwelling types, including a minimum of 40% 4+ bed roomed detached and 30% 3+ bed roomed detached or semi-detached houses. Given that this site is anticipated to provide aspirational housing to attract and retain economically active residents in the borough, a proportion of five bedroom houses may also be suitable. A small proportion of bungalows on the site would also assist in providing a good range of housing to meet the needs of the community.

I have not seen any indication of house designs and given that there is no intention of the current applicant to develop the site then I am not expecting to do so.

However, I would advise on the following key areas:-

- The scale of development in surrounding built-up areas is generally two storey which would be appropriate for this site. The site slopes steeply from higher ground to the south down to the north (the difference between the lowest and highest ground being around 23m). The scale of development will need to be sensitive to this. Three storey development would not be appropriate and only a small number of 2.5 storeys may be suitable where they are used as positive landmark features.
- The form of development should reflect the best of the distinctive character of the local area. The vernacular form of development has gable roofs, stone door and window surrounds, chimneys and simple detailing with a vertical

emphasis. A good development will create a design theme that echoes the traditions of the local area in its own distinctive way to provide an appealing and high quality appearance.

- Stone or a mix with some dwellings constructed in brick with slate or slate equivalent roofs would be appropriate on this greenfield site.
- Policy HS4 requires a minimum of 20% of dwellings to be designed to be adaptable to support the changing needs of occupiers over their lifetime, including people with disabilities. I note that you have two house types that would be able to fit this criteria; this information should be submitted with an application in order to demonstrate compliance.
- Policy SP5 seeks high standards of sustainability in development. An application will need to be supported with information to show how the development :-
 - has incorporated measures to minimise energy and water consumption;
 - sought opportunities for on-site energy supply from renewable and low carbon energy sources; and,
 - sought opportunities to contribute to local and community-led renewable and low carbon energy initiatives.
- Details of electric car charging points should also be provided with an application. The minimum requirement in Policy IC3 is one charging point for each detached house. However, where electric charging points are required to mitigate against air pollution then a charging point may be required for each new dwelling.

Drainage

I have been unable to obtain expert advice on the Flood Risk Assessment and Drainage Strategy that you have submitted as the consultee in this respect, the Lead Local Flood Authority which is Lancashire County Council (LCC), require pre-application enquiries to be made to them. I do note however that the drainage strategy requires further work so you may like to consider approaching LCC to see what guidance they can offer at this stage. The approach in the FRA appears to follow guidance but the Drainage Strategy is not clear. The four parcels of land for attenuation amount to 1.09ha less than the site as a whole (8.65ha) and there appears to be a high discharge rate at parts of the site (Parcel A). It is not conclusive where and how water is discharged to watercourses. A Management Plan is also required (or an outline of one to start with) to show how all aspects of site drainage would be managed and maintained in the future. Issues around flooding will be extremely sensitive; I have noticed some pictures and videos of local flooding that have been posted on the internet by local residents. I expect therefore for it to be an area of concern and this will need addressing with a robust drainage strategy.

Archaeology

Policy HS1/2 refers to the presence of known heritage assets from the medieval period and earlier. In response to the Archaeological Desk Based Assessment that

you have submitted, I have received the following comments from the Lancashire County Council Historic Environment Team:-

“It would have been more helpful if Salford Archaeology’s Archaeological Desk-Based Assessment had included some other material, such as Aerial Photographs of the site in the 1940s and 1960s that can be found in the Historic Environment Record, as well as copies of the lidar images (referred to in gazetteer Entry 005, p.29), and which are considered to aid in an interpretation of the cropmarks visible on a number of unsourced (Google?) images included in the report.

The DBA concludes that there are a number of cropmarks within the site that merit further archaeological investigation, due to their potential to relate to medieval agricultural exploitation of the area, and to contribute to an assessment of the Historic landscape at this time. They are however not considered to be an indicator of early settlement of the area.

It is however the Historic Environment Team’s opinion, based on the additional information mentioned above, that all of the cropmarks recorded within the site are much more likely to simply be associated with former agricultural field boundaries visible on the mid-19th century Tithe and 1st Edition 1:10560 Ordnance Survey mapping, and/or 20th century ploughing of the site. The site has already been recorded in the Lancashire Historic Landscape Characterisation project (readily available but not used in the DBA) as Post-medieval enclosure (either land newly enclosed or anciently enclosed land that had been substantially reorganised between AD1600-1850), and they are therefore not considered likely to have a medieval origin. The nature of their construction remains visible in the surviving hedge/bank/ditch arrangement that can still be seen on site (Plates 11-14) , and a topographical survey of those that remain, possibly accompanied by a section through one of them might be considered more useful. It is not standard practice in Lancashire to record such boundaries archaeologically, and elsewhere in the North-west such recording has concentrated on the more historic and larger Parish or Township boundaries.

Submission of a planning application to develop the site might therefore meet with advice from the HET that some limited archaeological investigation and recording of the site is required, and which could be secured by means of a suitably worded planning condition.”

Ground Conditions

The Council’s Environmental Health Officer has reviewed the preliminary desk top study report C8498 by Sirius and concurs with the recommendations of the report that a full intrusive ground study is required. Full gas monitoring investigations would also be required. This could be submitted with an application or would otherwise form a pre-commencement condition.

The proposed site is potentially affected by coal mining legacies with the northern part of the site being within the highest risk area. It will be necessary to carry out and submit a Coal Mining Risk Assessment with an application for planning permission. Please contact the Coal Authority if you wish further advice on this:

www.gov.uk/government/organisations/the-coal-authority

Affordable Housing

Policy HS2 sets out the Council's requirements for the inclusion of affordable housing within new housing developments which is copied below:-

- 1) The Council will work with public and private sector partners to seek to ensure that there is a sufficient supply of good quality affordable housing, particularly in the areas of highest need by:
 - a) Supporting and facilitating the acquisition and adaptation of existing housing by registered providers;
 - b) Working proactively with registered providers to identify sites and deliver schemes to provide affordable housing; and
 - c) Requiring the provision of affordable housing through all housing developments of over 10 units, unless the applicant can demonstrate that a site, which would otherwise be supported by the policies in the Plan and meets the requirements of Policies SP4 and SP5, would not be viable with affordable housing provision on-site or off-site by way of a contribution.
- 2) The exact amount of financial contribution/number and tenure of affordable units will be determined by economic viability having regard to individual site and market conditions.
- 3) Any affordable housing required should be provided:
 - i) on-site where this can be achieved without compromising other important policy considerations⁴² or viability; or
 - ii) off-site where on-site provision has been satisfactorily demonstrated not to be justified under i) and where it can be demonstrated that the contribution would facilitate the delivery of affordable housing of an appropriate type at a suitable policy-compliant site.
- 4) All new affordable housing should be designed to minimise indications of its tenure in order to facilitate inclusive communities.
- 5) Where affordable housing is being delivered, the Council will seek to ensure an appropriate tenure mix using the following percentages as a guide (and sizes and types as set out in Policy HS3).
 - Affordable Rent or Social Rent: 80%
 - Intermediate tenure: 20%

The Council is also preparing A Supplementary Planning Document on Developer Contributions. Comments are currently being considered following public consultation but a copy of the draft SPD is available to view on the Council's web site. Considering both Policy HS2 and the draft SPD, there is an expectation that this site will deliver a minimum of 10% affordable housing. This should be provided on-site unless there is a clear justification for not doing so. Given the amount of development that is likely to be achieved on the site then I would expect a range of housing to include 2-3 bedroom houses that are suitable for affordable housing. These should not be located either in one place but should be well integrated into the scheme. An Affordable Housing Statement should be submitted with an application to clearly set out how the development would comply with Policy HS2, including the proposed housing tenure. A site layout should also be submitted to show the spread of affordable housing across the site.

Education

Policy IC4 of Burnley's Local Plan states that development will be required to provide or contribute towards the provision of the infrastructure needed to support it. In addition to off-site highway infrastructure improvements referred to earlier, it is also likely that the amount of development will generate a need to contribute to

additional school places. Lancashire County Council is the local education authority and publish their methodology for generating the pupil yield from a development:-

<https://www.lancashire.gov.uk/council/planning/planning-obligations-for-developers/>

This is based upon the following rates:-

No of Bedrooms	Yield per development - Primary	Yield per development – Secondary
1	0.01	0.00
2	0.07	0.03
3	0.16	0.09
4	0.38	0.15
5+	0.44	0.23

Primary Cost per place is currently £16,050.54

Secondary Cost per place is currently £24,185.16

Based on a total of 184 dwellings with for example, 40% 4 bed; 30% 3 bed; 20% 2 bed; 10% 5 bed, this would generate a pupil yield of 47 primary school places and 21 secondary school places. On application, Lancashire County Council would assess the availability of primary school places (within a 2 mile radius) and secondary school places (within a 3 mile radius), within the following five years, taking account of other commitments that may affect capacity. Where there is a shortfall, there will be a request made for an education contribution. Using this example of housing numbers and bedroom mixes (which is for indicative purposes only), if there was a shortfall of all the extra places, this would amount to a cost for a total of £1,262,263.74. Any existing capacity in school places within the given radius distances would lower the amount required for a contribution and an amount would also vary dependent upon the number of dwellings and their bedroom numbers.

Where an applicant does not agree to education or other contributions on viability grounds, then a viability assessment would be required in line with Policy IC4.

Checklist requirements

The Council's Validation Checklist is available to view on the Council's web site using the link below:-

https://www.burnley.gov.uk/sites/default/files/2017%20Planning%20Application%20Validation%20Checklist%201st%20November%202017_0.pdf

I have listed below the documents that should be submitted with your application:

Design and Access Statement
Planning Statement (including open space assessment)
Energy Efficiency Statement
Crime Impact assessment

Tree Survey and Arboricultural Implications Assessment
Land Contamination desk top assessment
Ecological survey (surveys as identified in your preliminary appraisal and including mitigation schemes)
Air Impact Assessment
Transport Assessment
Travel Plan
Landscape Scheme and Management Plan
Utilities Statement and foul sewage assessment
Coal Mining Risk Assessment
Refuse and Recycling statement
Flood Risk Assessment
Sustainable Drainage Assessment (and Management/Maintenance Plan)
Affordable Housing Statement
Desk top Archaeological assessment
Planning Obligations – Heads of Terms
Summary of application

To conclude, I would like to thank you for the opportunity to comment on your pre-application proposals. The foregoing comments and advice are provided without prejudice to the formal determination of any application for planning permission. Please contact me if you have any queries at all.

Yours sincerely

Janet Filbin
Principal Planner
Housing and Development Control