APPLICATION NO.
APPLICATION TYPE
REGISTERED

P13/V1832/O
OUTLINE
23.8.2013

PARISH SUTTON COURTENAY

WARD MEMBER(S) Gervase Duffield

APPLICANT Diageo Pension Trust Ltd

SITE Land to the west of Didcot Power Station Sutton

Courtenay Lane Didcot Oxfordshire, OX14 4BW Proposed redevelopment to provide new buildings

for storage and distribution (Use Class B8) and ancillary facilities, car and lorry parking, service areas, access and landscaping. (Revised drawings showing lower height and smaller footprint to main

buildina)

**AMENDMENTS** The scheme was reduced in height by 5m and

reduced in width by around 60m during Advent

2013. Full reconsultation was undertaken.

GRID REFERENCE 450339/192366
OFFICER Mark Doodes

### 1.0 INTRODUCTION

**PROPOSAL** 

- 1.1 The 25 hectare site forms the northernmost edge of Milton Park business park, and lies, to a great degree, within a designated employment site. The site is mainly rectangular with a smaller area to the south of the main site fronting Sutton Courtenay Lane. The existing Asda warehouse forms the southern boundary of the site. The site is about 3km from Didcot centre, but more closely relates to the main Milton Park and the village of Sutton Courtenay, which lies to the north. Housing is most proximate along Sutton Courtenay Lane, with residential properties being diagonally across from the site's north-western corner.
- 1.2 For the avoidance of doubt, the site does not include any of Didcot A power station. The site is flat and, aside from the overwashing "Lowland Vale" designation, is the subject of the policy NE11 "Areas for Landscape Enhancement" in the adopted local plan.
- 1.3 The site contains a large area of presently undeveloped land, which was formerly described as a campsite area and more recently, a nature reserve. The nature reserve has been relocated south, to within Milton Park. The western and northern edges of the site have been left largely unmanaged for many decades, resulting in a varied appearance in terms of quality and depth. The variation can be from sparse hedge to that of a woodland, this, combined with the open arable fields opposite, lend an open and rural feel to the area, despite its proximity to a power station and business park.
- 1.4 The status of the land as employment is not expected to change in the emerging local plan 2031. In total 740,000 sq/ft of B8 uses exist on site. A further consent for 86,600 sq/ft brings the total to 825,600 sq/ft consented.
- 1.5 The site plan can be found **attached** at appendix 1.

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### 2.0 **PROPOSAL**

- 2.1 The applicants seek outline planning permission including means of access, appearance, layout and scale for two storage/distribution warehouse buildings (use class B8) and associated works.
- 2.2 The first warehouse building, the smaller of the two, measures 176m by 56m deep (from Sutton Courtenay Lane). It is set back from Sutton Courtenay lane by approx 50m at its narrowest and this amount widens to approx 70m due to the irregular site shape. A landscaping buffer of 8m in depth (rising to 16m) has been provided of local native species, many of which are semi mature trees. A small car park for 75 cars will be provided to the north and space to park, turn and dock HGVs is in front of the building. Plans indicate that there will be 14 dock doors and parking for 33 HGV vehicles.
- 2.3 The larger unit, unit B, is considerably larger at 604m wide, 125m deep and 21m tall to the eaves and 23m to the ridge. The unit is not entirely uniform in height and has a step-down towards the western end, this lower section being 17m to the eaves and 19 to the ridge. There is a car park for 530 cars and 200 HGVs including space to turn and parking / waiting bays and cycle parking.
- 2.4 A number of attenuation ponds feature around the car parking area. A smaller 215 square metre gate house is also proposed for security personnel etc, along with various functional units commensurate with the overall scheme such as sprinkler tanks, fuel storage, waste units etc.
- 2.5 An indicative landscaping scheme has formed a key part of the landscape and visual impact assessment. The scheme shows a seven metre high bund with a substantial amount of trees of varying heights, including some evergreen.
- 2.6 The roofs on both schemes are to be finished in gull wing grey including roof lights. The elevations have been treated with profiled steel and flat cladding panels in monotone grey/silver that are neutral and practical for this type of building. The offices have been detailed with timber cladding which will soften their appearance and will add texture with age. No advertising or branding details have been provided, but an informative has been appended to ensure that any such advertising should be non-illuminated, lower level and discrete.
- 2.7 The only matter not to be considered in this application is landscaping. A copy of the plans proposed can be found <u>attached</u> at appendix 2, all other documentation such as the transport and visual amenity assessments, drainage strategies and archaeology assessments can be found on the council's website.
- 2.8 A new access T-junction will be created, with an engineered solution to ensure that HGVs and LGVs cannot turn right to head towards Sutton Courtenay. Various other highways matters are proposed such as new signage and contributions towards public transport and local network upgrades.
- 2.9 The scheme is expected to create directly between 1870-2730 jobs with a further 400-500 new positions estimated to be created indirectly in the locality. The applicants have taken into account the roughly 120 staff currently employed on the site in these estimations.
- 2.10 The application is before committee due to the objection from the parish council, the ward member and 162 local residents, including Ed Vaizey MP.

# 3.0 SUMMARY OF CONSULTATIONS & REPRESENTATIONS

3.1 Sutton Courtenay Parish Council – Objection. Traffic, visual impact, lower density employment, staff journeys through the village, ecology on-site. A copy of the consultation response can be found **attached** at appendix 3.

Neighbour Object (162) – Planning issues included; Traffic, major visual impact, impact on air quality, adequate jobs exist in the area, noise and disturbance, impact on air quality, archeology disturbance, wildlife impact, noise pollution, construction noise, loss of habitat, impact on Pillbox.

Neighbour No Strong Views (2) – Ambivalent

Local Residents Petition – Signed by 177 residents of Sutton Courtenay

Milton Park – Objection on grouds of scale, lack of public transport, traffic impact, lack of firm "science bridge" proposals.

Thames Water – No objection. The sewage capacity in the area is inadequate, however the use of grampian style conditions has been recommended, noting the scale of the proposals and the ability to attenuate.

County Highways – No objection, noting the off-peak traffic flows proposed. Contributions of £350,000 have been sought and agreed for off site highways works including contribution to the strategic "Science Bridge" over the A4130. A number of smaller matters have been raised, which are covered in section six.

Environment Agency – No objection, conditions recommended.

County Archaeologist (VWHDC) – Holding objection lifted following receipt of further information. The use of conditions is recommended.

Landscape Architect – Objection. Strong visual impact across the area. Impact on village setting and public footpaths as well as wide open views.

Environmental Protection - Comments / concerns regarding lighting impact.

Contaminated Land – Approve

Countryside Officer – Initially recommended the use of an "ecology offset" scheme against the previous scheme - however revised drawings now feature some on-site ecology enhancements sufficient to revise the consultation responses.

Drainage Engineer – Holding objection lifted following receipt of further information. Conditions have been recommended.

Oxfordshire Badger Group – Objection – Proposed wildlife mitigation / relocation is not acceptable.

Primary School Board of Govenors – Objection. Deep concerns regarding traffic, noise, disturbance of children at play times amongst other points.

Public Art officer – Supports the £60,000 agreed to finance a significant piece of on-site/gateway public art to add character and value to the scheme/area.

# 4.0 RELEVANT PLANNING HISTORY

# 4.1 <u>P11/V1088/EX</u> – Approved (12/08/2011)

Application to extend the time limit of outline permission SUT/12063/21-X for erection of a building for storage and distribution warehouse (class B8) or employment use (Class B2) with ancillary buildings.

# P09/V1228/DIS - Approved (22/09/2009)

Request for compliance with Conditions 7, 8, 9, 10 and 11 of Planning Permission SUT/20330.

# P09/V0929/RM - Approved (13/08/2009)

Reserved Matters application (following outline permission SUT/12063/21-X) for erection of building for storage and distribution warehouse (class B8) or employment (class B2) with ancillary works.

# P07/V1726 - Approved (28/08/2008)

Erection of B8 distribution warehouse with associated offices, service areas and ancillary facilities. Formation of access, hardstanding and landscaping (Amended Plans)

# P05/V1024/O - Approved (18/05/2006)

Erection of building for storage and distribution warehouse (class B8) or employment (class B2) use, gatehouse and sprinkler tank, formation of access, HGV parking, car parking and structural planting.

# 5.0 **POLICY & GUIDANCE**

- 5.1 Vale of White Horse Local Plan 2011 policies;
  - DC1 Design
  - DC4 Public Art
  - DC5 Access
  - DC6 Landscaping
  - DC7 Waste Collection and Recycling
  - DC8 The Provision of Infrastructure and Services
  - DC9 The Impact of Development on Neighbouring Uses
  - DC13 Flood Risk and Water Run-off
  - DC14 Flood Risk and Water Run-off
  - DC20 External Lighting
  - E10 Key Business Sites
  - E5 Milton Park
  - E6 West of Didcot Power Station
  - HE10 Archaeology
  - HE11 Archaeology
  - NE10 Urban Fringes and Countryside Gaps
  - NE11 Areas of Landscape Enhancement.
  - NE4 Other Sites of Nature Conservation Value
  - NE9 The Lowland Vale
  - TR3 A34 related development
- 5.2 National Planning Policy Framework (NPPF) Paragraphs 7, 14, 17, 18 to 22, 32, 56, 96, 103&104, 111, 125, 160 and 161.

# 6.0 PLANNING CONSIDERATIONS

- 6.1 **Principle of development -** This application has been highly contentious, however officers consider the principle of use of the land in question is relatively straightforward. Although not all the site is strictly allocated as employment, it is clearly within an easily identifiable parcel of such land and is closely related to other employment / industrial uses. The site (and its environs) remain an allocated employment site in the adopted 2011 Local Plan and the emerging local plan 2031. Therefore the fact that around a third of the site has not been developed to date is not a matter for debate in planning terms. As such officers have reached the rounded view that there is no conflict with the proposals and the local plan in terms of land use. The NPPF also seeks to encourage development which assists in supporting the local and national economy and competitiveness.
- 6.2 The applicant commissioned a market report for the wider area (from Savills) to examine the demand and supply for large-scale B8 buildings. The results concurred with the findings of the Vale's own local plan research, which showed a shortage of such provision in the area.
- 6.3 Setting aside the stated ambition to grow jobs in the Vale, the NPPF places significant weight on supporting economic growth, citing from the outset that sustainable development (paragraph 7) has three dimensions; environmental, social and economic. An extensive socio-economic statement was submitted with the application which is the product of many months of research, engagement and consultation. The operation proposed will bring three shifts working 24 hours a day. This choice alone will bring an employment density of three times many other schemes and would explain the relatively large quantum of employment offered. The types of work offered will be relatively varied. The applicant has engaged with the local employment partnership and has committed to maximise the use of local labour markets and create training opportunities. Setting aside the employment generated from construction, officers are in no doubt that the economic case for the application is solid and should be assigned weight accordingly.
- 6.4 Landscape and visual impact Following pre-application discussions, and significant revisions to the scheme since initial submission, landscape impact has been a major concern from the outset. The height of the eaves line on the western elevation closest to Sutton Courtenay Lane, is 17m (separated by 115m distance) rising to 21m further east. For point of reference, 21m is equivalent to a six storey residential building. Clearly in absolute terms this represents a significant mass of built form. However the matter requires a consideration of a number of factors. These will be explored but in summary are;
  - The Milton Park Local Development Order allowing buildings up to 15m tall to be constructed without express planning permission.
  - What can reasonably be expected on a site ostensibly allocated for storage and distribution in the local plan
  - The substantial mitigation strategy put forward.
  - The distance to Sutton Courtenay proper including the historic core (CA).
  - The removal of the Didcot A power station and cooling towers this summer.
- 6.5 Milton Park LDO In 2012 the Vale adopted a Local Development Order (LDO) for the Milton Park business park which seeks to promote business growth by reducing the burden of the planning system in the specified area, subject to certain criteria. One such criteria is to allow new buildings up to heights of 12m or 16m, depending on their location, without the need for formal planning permission. This is not a maximum high restriction. Although the application site does not lie within the LDO area, the north-east boundary of the LDO does lies immediately adjacent to the south-west corner of the

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site. Therefore the proposed building, at 23 metres tall to the ridgeline, needs to be considered in this context.

- Development in industrial parks The Vale has an ambition to grow the number of jobs in the two districts by 12,000 over the lifecycle of the emerging local plan. In line with such an ambition is the expectation that the existing main centres of employment will grow and develop. Recently permitted large scale new buildings include the ESA building (17m high) and the RAL space building (15m high) at the Harwell Campus. This site, noting its size and location close to the A34 is under utilised in terms of employment quantum. According to data from the applicant only 120 people are employed on the site at present. Large scale buildings are a common and expected feature of industrial sites and the proposed buildings will be seen from the Sutton Courtenay approach within the cluster of buildings of Milton Park, and the Didcot B power station.
- 6.7 Views from Great Western Park Following the imminent demolition of the Didcot A power station, views from the main entrance of Great Western Park will encompass views the proposed site. With the power station apparatus being removed from the field of vision, residents and users of the parks will be aware of the bulk and mass of the units proposed. However, the view from Frank Williams Way (in Great Western Park) will also draw from the context of Milton Park and the industrial estates in the area. However, given the distance between the two sites (approximately one kilometre) officers are satisfied that a 23m high building would not unduly dominate the vista.
- 6.8 Relationship to Sutton Courtenay – A detailed Landscape and Visual Impact Assessment (LVIA) was undertaken, and subsequently revised and expanded in winter 2013. The methodology is considered to be sound in that computer generated photomontages have been assembled showing the likely impact of the scheme at year one and year ten in both summer and winter conditions. The conclusions of the body of work are that the proposed seven-metre high undulating bund combined with tree planting will create a discernable defining edge to the boundary between the developed industrial area and the undeveloped rural landscape to the north and west. Policy NE10 seeks to protect the important rural fringes and gaps of the district from development pressure. The proposal has clear implications on the setting and importance of the gap between the site and Sutton Courtenay village. The height and massing of the proposals are the prime concern in this regard. The new building will be 50m away from the boundary at the narrowest point but up to 90m at it's widest. This separation, combined with the tall bund and the planting proposed, has done much to address officer concerns.
- 6.9 The southern-most houses along Sutton Courtenay Lane (numbers 48-58) are the closest element of the village to the scheme. The revised drawings significantly improve the relationship between the development and these residential homes. The distance of visual separation is in the region of 140m, which, when combined with the landscaping and bund proposed, have reduced initial concerns of officers. The LVIA contains CGI images of the corner in question from ground level and demonstrate that at year one the new development should be entirely screened by the semi-mature planting and other landscaping. It will take longer for the proposed landscaping to mitigate the visual impact from first-floor windows. However this impact is not considered sufficient to warrant refusal.
- 6.10 The separation of the proposals from the village conservation area is well in excess of 500m, and officers consider that the proposals will be barely visible from almost all parts of the conservation area in the public realm, with many homes, trees, hedgerows and other mitigating landscape lying in between. Therefore the application is not

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considered to unduly erode the character or appearance of the conservation area, or the setting of any listed building. Thus the proposals are considered to accord with Policies HE1 and HE4 of the adopted local plan as well as section 12 of the NPPF.

- 6.11 The scale and mass of the building feature strongly throughout the consultation responses. With an eaves height of up to 21m, and ridge of 23 m, the proposal will be the largest structure in the area once Didcot A's turbine hall (which is 30m high) and cooling towers are removed this summer. The removal of many bulky structures in the vicinity, it has been argued, will mean this building will be the new "focal point". However the proposed buildings have to be considered with the accompanying landscape proposals. The applicants have, following dialogue with landscaping officers, substantially increased the number of trees proposed, and have also demonstrated views from many more locations. Members will need to give this matter careful consideration. Officers have carefully examined the LVIA photomontages and the information relating to the proposed bund, the landscaping and the likely growth of the species proposed, and consider that, subject to conditions, the proposal now has an acceptable impact.
- 6.12 Highways Transport concerns are a key feature of many consultation responses. The scheme, being a storage and distribution proposal, will generate a large number of HGV movements as well as staff journeys. The site operator has a direct business interest in avoiding the peak-time traffic flows in the area. Consequently the operator will be operating three eight-hour shifts starting at 6am. Staff will start arriving before shifts commence and lorry movement shortly after. Therefore despite the relatively large volume of movements proposed as an absolute figure, the increase in peak hour traffic on the road network as a consequence of this scheme is estimated to be only 1.5%. The county engineer agrees with these conclusions from the applicant's transport statement.
- 6.13 HGVs and LGVs will be the subject of an enforceable routing agreement and will not be permitted to use Sutton Courtenay, other local villages, or Milton Road (a private road), and instead will be routed toward the A4130 roundabout then on toward Milton Interchange and the wider national network. The entrance junction has been specifically designed to reinforce the routing agreements proposed to make accidental right hand turns from the site not possible for longer vehicles. It is not possible to control how staff will choose to travel to work, and it has to be accepted that a certain proportion of private vehicle journeys will be made through the village of Sutton Courtenay at off-peak times
- 6.14 The NPPF states that for an application to be unacceptable in highways terms, a severe impact must be demonstrated. Officers believe that although the volume of traffic will be large, the choice of three shifts and the routing agreements proposed will ensure that such an impact simply cannot be demonstrated from these proposals.
  - County officers have agreed a package of off-site works to include new signage, improvements to the public transport availability in the early hours and evening shifts. The proposal includes secure and sheltered storage for cycles, which will help to provide a viable alternative to using the private motorcar for employees. Changes to the local cycle network are also proposed to improve safety.
- 6.15 Green travel plan In line with other schemes, the operator has agreed to provide a detailed plan to promote to staff more sustainable means of transport such as cycling, public transport or car-sharing. The outcome of this plan will be a reduction in the impact of cars on the nearby highway network, particularly the village of Sutton Courtenay'

- 6.16 *Highways wear and tear* Wear and tear on has featured in many local consultation responses. This not a material consideration for planning applications.
- 6.17 **Drainage and sewage** A detailed surface water attenuation scheme was submitted following an initial holding objection. The detailed scheme of attenuation ponds, the use of landscaping and other sustainable urban drainage scheme (SUDS) principles have assured local drainage engineers that the scheme will not contribute to any surface water issues in the area. It is noted that the site sits on sand and gravel deposits, meaning that the local drainage, once a surface layer has been penetrated, should be favourable in any event. Regarding foul drainage Thames Water have not objected to the works subject to improvements to local sewers. The developer will be expected to finance such works in full.
- 6.18 Ecology The site was at one point a nature reserve, but this was relocated south, into the Milton Park estate. The site has been subject to a phase 1 and 2 habitat survey by external consultants. The conclusions of the study find that there will be a significant negative impact as the site is cleared (as one would expect) however the drainage, noise and landscaping mitigation aspects to the proposals have also proven fruitful in ecological terms. The nine new SUDS area, which will vary from resembling ponds to damp marshland in different times of the year will provide a good deal of off-set against the net large reduction in non-developed land on the site.
- 6.19 Para 117 of the NPPF refers to both preservation, restoration and re-creation of priority habitats, whilst para 118 sets out the basis for determination of planning applications. Para 118 states that "...if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;..." Overall the applicant is seeking to mitigate the impact of the development adequately on site. Initially the council's countryside officer sought an off-setting scheme, which would see developers funding off-site ecological initiatives to compensate for the local loss of habitat. However, since these initial views were formed revised drawings have submitted, for different reasons, a large new area of undeveloped land to the north west of the site. This land will form part of an "open mosaic habitat" which the consultants claim will provide a higher quality environment for ecology to flourish such as reptiles, water voles, bats and badgers.
- 6.20 It is accepted that there will be a negative impact on the larger species such as buzzards and sparrowhawks, who would have used the site for hunting. However, the site would have likely formed part of a large hunting area, and therefore the proximity of large areas of rural landscape alleviate such concerns to the extent that the countryside officer has raised no objection.
- 6.21 An objection has been received from the Oxfordshire Badger Group regarding the impact on an existing sett. However, a new artificial badger sett was constructed in 2012 (located around 100m from the existing) and there is evidence that the badgers have relocated successfully by their own accord. Should planning permission be granted, an application will be made to Natural England to formally close the original sett.
- 6.22 **Archaeology** An initial holding objection prompted a comprehensive archaeological survey of the site on behalf of the applicant. The recommendations made include the use of a written scheme of investigation (WSI) to guide and inform a full archaeological evaluation and mitigation, using contractors endorsed by the county archaeologist. It is likely that the processes of gravel extraction (quarrying) and agricultural activity will

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have had a negative impact on the range and quality of such remains. The revised plans include the retention of a WWII pillbox on the northern boundary of the site, which the parish council have expressed an interest to see retained. The application is considered to satisfy policy HE10 of the Local Plan, by the use of conditions.

- Noise impact Setting aside the noise generated during the construction phase, the operational activity on the site would be in two areas; the internal activity of a storage and distribution site (which will be largely contained by the energy efficient fabric of the outer shell) and the movement of HGVs. The HGV activity itself is clearly the greatest area of concern. The measures proposed to mitigate the 24-hour activity include the proposed bund, the soft landscaping to absorb sound and the increased distance between the warehouse and housing shown in the amended plans. The bund itself is intended to divert sound up and away from nearby residential properties whilst the landscaping, including the choice of a deep, varied foliage, is designed to absorb sound. Officers are satisfied that the distance to the village is sufficient to dilute and dissipate the noise generated from day-to-day operations to near background levels. It also has to be borne in mind that the site has an established industrial use. Conditions are suggested in accordance with the comments of the council's environmental health service.
- 6.24 **Lighting impact** Following officer concerns, revised drawings submitted to wards the end of 2013 show an improved lighting scheme that has been specifically altered to reduce the impact of the high level lighting on the immediate environment. Being a 24-hour operation measures to control the night-time lighting on the scheme will need to be in place. High level flood lighting will need to be avoided in favour of more sensitive lighting. A condition ensuring that lighting details are provided and controlled is recommended.
- 6.25 **Energy efficiency** –The BREEAM system covers commercial buildings and provides a flexible framework for developers to choose a range of energy efficient measures which can range from using highly efficient materials and recycling rainwater to providing cycle storage and promoting car share schemes. It is a matrix system where weighted points are awarded, and has become the international standard. The developers have submitted a pre-assessment survey which has concluded that, if the scheme were to be built as specified, the overall rating will be "Very Good" based on the 2011 BREEAM standards.
- 6.26 **Restriction of uses** As with similar sites, the small risk that the refuelling station and lorry wash facilities could be sub-contracted or opened up to members of the public to use is considered undesirable enough to impose a condition this effect.
- 6.27 **Contributions** Discussions with officers and the parish council have yielded the following in the form of contributions;

Offsite highways works including science bridge £350,000 Parish fund offered (not as yet accepted) £100,000 Public Art £60,000

Councillors should note that contributions from areas such as education, waste, and sports facilities are garnered only from residential schemes.

### 7.0 CONCLUSION

7.1 The NPPF states that sustainable development should be permitted unless the adverse effects significantly and demonstrably outweigh the benefits. The NPPF also states that there are social, economic and environmental dimensions to sustainability and that

conclusions must be reached taking into account the NPPF as a whole.

- 7.2 It is the officers' view that significant weight should be afforded the economic dimension to this scheme. Estimates are that around 1870-2730 new positions will be available for flexible shift work. Evidence from the developers contact with local employment and training organisations shows that there is strong demand for such opportunities in the wider area. Such a quantum of development will bring local and sub-regional economic gain. It is a fact that the site is largely an allocated employment site.
- 7.3 This commercial development raises a number of competing issues that councillors will need to consider carefully, and reach their own conclusions. Officers consider the technical issues relating to highways, drainage, sewage, ecology, noise and archaeology are now acceptable. Aside from these, councillors will need to reach a view concerning the weight to be attached to the economic gains from the proposal and the environmental impact that it entails. Given the evidence regarding the significant landscape scheme that is proposed, officers consider the environmental impact to be acceptable.

# 8.0 **RECOMMENDATION**

Grant Outline Planning Permission subject to a legal agreement and the following conditions.

- 1 : Commencement Outline Planning Permission
- 2: Submission of Reserved Matters General
- 3 : Sample materials required (walls and roof)
- 4: New vehicular access \*
- 5: Cycle Parking Facilities
- 6 : Cyclists Shower/Changing Facilities
- 7 : Construction Traffic Management
- 8: Green Travel and Freight Transport Plans
- 9: No Surface Water Drainage to Highway
- 10 : Lighting Condition (Luminance of Advertisements) \*
- 11: UNIQUE Highways Miscellaneous inc S278
- 12 : Landscaping Scheme (trees and shrubs only)
- 13 : Landscape Management Plan
- 14 : Landscape implementation
- 15 : Boundary walls & fences
- 16 : No additional commercial floorspace \*
- 17: Hours of Construction \*
- 18: Demolition schedule and methods
- 19 : Archaeology following WSI
- 20 : Noise attenuation (internal noise)
- 21: Surface Water Drainage
- 22 : Foul Drainage
- 23: Car Washing and Petrol Filling Station to be for operator use only.

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