



Report to West Area Planning Committee

Application Number:	21/07275/FUL
Proposal:	Erection of single storey infill extension to south, 4-storey extension to north and second floor side extension with alterations to building to provide 12 additional bedrooms, new main and level entrance, creation of rear and front garden with improvements to the external appearance of the building and associated works
Site Location:	London House 85 London Road High Wycombe Buckinghamshire HP11 1BN
Applicant:	Tenergy Developments Ltd
Case Officer:	Heather Smith
Ward(s) affected:	Ryemead & Micklefield
Parish-Town Council:	High Wycombe Town Unparished
Date valid application received:	5th August 2021
Statutory determination date:	30th September 2021

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 Full planning permission is sought for the erection of single storey single storey infill extension to south, 4-storey extension to north and second floor side extension with alterations to building to provide 12 additional bedrooms, new main and level entrance, creation of rear and front garden with improvements to the external appearance of the building and associated works.
- 1.2 The provision of additional residential accommodation is acceptable, in principle.
- 1.3 This proposal will not have an adverse effect upon the amenities of adjacent residential properties by way of loss of light, loss of privacy or increase noise and disturbance.
- 1.4 This proposal will have no adverse effect upon highway safety
- 1.5 This proposal will not be at risk from flooding and will not increase the risk of flooding elsewhere

- 1.6 However, the proposed reduction in on-site parking facilities, combined with an increased number of bedrooms, will result in pressure for existing on-street car parking spaces, to the detriment of existing residents in the locality.
- 1.7 This proposal is poorly designed and will result in detriment to future occupiers, by way of noise and disturbance, a poor outlook and a loss of privacy.
- 1.8 Cllr A Baughan has requested that this application be considered by the Planning Committee, due to the impact this proposal would have on neighbours privacy and daylight; the bulk and scale of the development and the lack of parking.
- 1.9 An appeal against the non-determination of this application has been lodged. Therefore, it is recommended that had the Local Planning Authority been in a position to determine this application, it would have been refused.

2.0 Description of Proposed Development

- 2.1 London House is an existing 4 storey high, accommodation block, with 42 existing bedrooms. In accordance with information provided by the applicants, the property currently provides accommodation for students, with approximately 10% of rooms occupied by non-students.
- 2.2 This proposal seeks full planning permission to erect a four storey high side extension onto the northern elevation of the building, together with a single storey infill extension, at the lower ground floor level, to the south. The proposed extensions will facilitate an additional 12 bedrooms, internal alterations and a private amenity area to the rear. A total of 54 bedrooms will be provided.
- 2.3 The submitted plans show that 6 new bedrooms will be provided on the lower ground floor; 1 additional bedroom on the ground floor; 1 additional bedroom on the first floor and 4 new bedrooms on the second floor.
- 2.4 The submitted plans show that the proposed extensions will require the removal of all of the 8 off street car parking spaces from the property and provide only one space for a disabled driver, together with cycle storage provision.
- 2.5 A similar planning application was refused planning permission, under delegated powers, in March 2021. The grounds of refusal were as follows:

In the opinion of the Local Planning Authority, the quality of the overall layout of this proposal results in a poor form of development. This would have a detrimental impact upon the future living environment for its occupiers. It would result in a substandard living arrangement for those future occupiers due to a lack of, or poor outlook, a lack of privacy and increased noise and disturbance by other residents. As such, this proposal would be contrary to Policy DM35 (Placemaking and Design Quality) of the adopted Wycombe District Local Plan (August 2019) and the Residential Design Guidance (June 2017).

In the opinion of the Local Planning Authority, this proposal would result in the unacceptable loss of off street car parking spaces, which would lead to an increased demand for limited, unrestricted on street parking elsewhere. This increase in demand for on-street car parking would be detrimental to the existing amenities of local residents in the area, who rely on the unrestricted areas of parking. As such, this proposal is contrary to Policies DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality) of the adopted Wycombe District Local Plan (2019).

Insufficient information has been provided to demonstrate that this proposal will not increase the risk of flooding on site and elsewhere. As such, this proposal is contrary to Policy DM39 (Managing Flood Risk and Sustainable Drainage Systems) and to paragraph 165 of the National Planning Policy Framework.

2.6 The current application, again proposes a similar form of extension, together with the removal of all off street car parking from the site. However, this current scheme differs in that the layout of accommodation has been amended; a revised surface water drainage scheme has been prepared and the use of the development will be restricted to student accommodation only.

2.7 The application is accompanied by :

- a) Design and Access Statement
- b) Planning Statement
- c) Transport Assessment,
- d) Daylight and Sunlight Assessments
- e) Energy Report
- f) Surface Water Drainage Scheme and FRA
- g) Ecology and Trees Checklist.

2.8 Amended plans have been received to address the potential of overlooking into adjacent properties; and to overcome objections from the LLFA regarding surface water drainage.

3.0 Relevant Planning History

Reference	Development	Decision	Decision Date
11/07337/FUL	Change of use from offices to house of multiple occupancy providing 42 no. en-suite bedrooms, 6 no. communal kitchens, 1 no. communal common room, laundry, cycle store, bin store, 9 no. parking spaces and associated external alterations	PEOBL	29 June 2012
13/06394/FUL	Change of use from offices to house of multiple occupancy providing 50 en-suite student bedrooms, 7 communal kitchens, 1 communal common room, laundry, cycle store, bin store, 1 Disabled Parking space and associated external alterations with provision of a new garden (alternative scheme to that permitted under 11/07337/FUL)	REF	4 October 2013
15/06275/VCDN	Variation of condition 10 attached to PP 11/07337/FUL (Change of use from offices to	PER	3 July 2015

	house of multiple occupancy providing 42 no. en-suite bedrooms, 6 no. communal kitchens, 1 no. communal common room, laundry, cycle store, bin store, 9 no. parking spaces and associated external alterations) to allow for increased 'summer lets'		
17/08151/VCDN	Application for removal of condition 10 (occupation restrictions) attached to PP 11/07337/FUL (Change of use from offices to house of multiple occupancy providing 42 no. en-suite bedrooms, 6 no. communal kitchens, 1 no. communal common room, laundry, cycle store, bin store, 9 no. parking spaces and associated external alterations)	PER	26 February 2018
20/06957/FUL	Erection of single storey infill extension to south, 4-storey extension to north with alterations to building to provide 12 additional bedrooms, new main and level entrance, creation of rear garden with improvements to the external appearance of the building and associated works	REF	9 March 2021

4.0 Policy Considerations and Evaluation

Principle and Location of Development

Wycombe District Local Plan (August 2019): CP1 (Sustainable Development), CP3 (Settlement Strategy), CP4 (Delivering Homes), DM33 (Managing Carbon Emissions, Transport and Energy Generation)

DSA: DM1 (Presumption in favour of sustainable development), DM6 (Mixed-use development)

4.1 The WDLP Spatial Strategy directs development to sustainable locations in terms of both environmental constraints and access to employment, shops and services etc. without placing reliance on the private car.

4.2 This site is located within a higher tier sustainable settlement, where many forms of new development are acceptable in principle. The principle of development is acceptable subject to compliance with development plan policies.

Affordable Housing and Housing Mix

Wycombe District Local Plan (August 2019): DM22 (Housing Mix), DM24 (Affordable Housing), DM41 (Optional Technical Standards for Building Regulations Approval)

Planning Obligations Supplementary Planning Document (POSPD) relevant policies & SPD)

4.3 This proposal falls outside the Council's requirements for affordable housing as it is considered to be "other residential development".

4.4 The proposed intensification of the use is acceptable in principle given the mixed character of the area and the existing use of the building.

Transport matters and parking

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), DM33 (Managing Carbon Emissions, Transport and Energy Generation)

DSA: DM2 (Transport requirements of development sites).

4.5 The Highway Authority commented upon a previous application at this site (20/06957/FUL) dated 28th August 2020. The application proposed extensions to provide an additional 12(no) bedrooms. The comments from the Highway Authority ultimately had no objections to the proposal.

4.6 After assessing the proposed plans for the current application, it is noted that the quantum of development is the same when compared to the previous application, as 12(no) additional bedrooms are proposed, and the parking provision of the site is reduced to 1(no) disabled bay. Mindful of this, the Highways Authority wish to re-iterate their previous comments.

4.7 It is noted that in previous responses to applications on this site, the Highway Authority considered a shortfall in parking spaces acceptable in consideration of the location of the site and the consequent access to good levels of reliable and frequently scheduled public transport options, in addition to the plethora of waiting restrictions in force on the local network.

4.8 The site is in a sustainable location from a transport perspective. High Wycombe train station is in close proximity to the site, there are multiple bus stops along London Road in the sites vicinity and there are many local amenities within suitable walking distance. A site in a sustainable location reduces the need for residents to own and subsequently park a car. Furthermore, it is recognised that car ownership amongst students is likely to be low.

4.9 Additionally, the parking restrictions and permit parking times implemented along Queen's Road are not synonymous to that of a street with dangerous parking. Double yellow lines prevent parking close to the junction with London Road as well as on the inside of the bend in the road. Similarly, the parking permit bays have restricted times of 9am - 6pm between Monday and Saturday and appear to be in place to deter commuters from parking in these bays. The on-street parking bays are also available for one hour on a pay-and-display basis. Finally, London Road (A40) has double yellow lines on both side of the carriageway, eliminating the possibility of on-street parking. Given the plethora of waiting restrictions in force on the network, there are few options for parking in a location which could be considered dangerous.

4.10 Mindful of the above, the Highway Authority raises no objections and in this instance no conditions to include on any planning consent that you may grant.

Raising the quality of place making and design

Wycombe District Local Plan (August 2019): CP9 (Sense of place), DM34 (Delivering Green Infrastructure and Biodiversity in Development), DM35 (Placemaking and Design Quality)

DSA: DM11 (Green networks and infrastructure), DM16 (Open space in new development)
Housing intensification SPD.

- 4.11 The proposed extensions have been designed to reflect the scale and appearance of the existing 4 storey building. As such, it is considered that they will have no adverse effect upon the character of the surrounding area.
- 4.12 The proposed re-location of the main entrance onto the south eastern elevation and the fenestration alterations will create a more active frontage for this building on both the London Road and Queens Road frontages. This is a welcome improvement upon the existing frontage.
- 4.13 On balance, this proposal will have no adverse effect upon the character of the surrounding area or the visual amenity of the street scene.

Amenity of existing and future residents

Wycombe District Local Plan (August 2019): DM35 (Placemaking and Design Quality), DM40 (Internal space standards)
Housing intensification SPD.

- 4.14 The applicant has provided details which demonstrate that the proposed additional bedrooms and facilities will comply with the minimum size standards, as set out in the Council's adopted standards for Housing in Multiple Occupation. Furthermore, the applicant has also provided details which demonstrates that the additional habitable accommodation now proposed will receive the minimum levels of daylight and sunlight considered to be acceptable.
- 4.15 However, as with the previous proposal, the proposed additional 6 bedrooms on the lower ground floor level will be sited approximately 3 metres from the existing boundary fencing, which rises to between 2 and 3 metres above the ground level of the application site. Although the submitted plans show that the proposed bedrooms will look out onto a communal amenity area, the proximity of a 3 metre high boundary fence, to the north east of the accommodation, together with the 4 storey side extensions will severely restrict the outlook to the habitable rooms.
- 4.16 The applicant has provided evidence that the minimal level of daylight/sunlight can enter each new bedroom proposed. However, again, the outlook from each bedroom remains limited.
- 4.17 The submitted plans show that the proposed lower ground floor amenity space will be a communal area. Therefore, the occupants of the proposed rooms on this level will be overlooked and potentially disturbed by anyone using the amenity space. The applicant has previously argued that this is a common relationship often found in student accommodation and that the Council has granted planning permission for similar scheme elsewhere in its area, in 2013 and 2014. The applicant has also confirmed that the proposed lower ground floor will only be used for student accommodation.
- 4.18 However, even if the proposed lower ground floor was only to be used as student accommodation, these new bedrooms would still be overlooked by the communal open space, resulting in a lack of privacy and noise and disturbance to the occupants. This, coupled with the poor quality of the proposed outlook would render the new bedrooms as unattractive spaces in which to live and work. The fact that the occupants may be students does not justify a poor standard of accommodation.

- 4.19 With regard to the amenities of the existing adjacent residents, concern has been raised by an adjacent resident that the proposed development will result in an unacceptable loss of light and privacy to the neighbouring property, together with an increase in noise and disturbance from students.
- 4.20 With regard to an increase in noise and disturbance, it is not considered that the addition of a further 12 bedrooms would generate any significant rise in the levels of noise and disturbance, than the existing facility. In the event that anti-social noise does arise, this matter would be controlled by the Council's Environmental Services.
- 4.21 In terms of light, the proposed extensions comply with the Council's light angle guidance and therefore will not result in any significant loss of light to adjacent residents at No 83 London Road.
- 4.22 The submitted plans do show that habitable room windows are to be installed in the return elevations of the proposed side extensions. However, these windows will be installed at an angle to as to minimise any direct overlooking into the rear of the adjacent property.
- 4.23 However, it is considered that the removal of all car parking provision from the application site (except for 1 disabled space) will result in the increased demand for on-street car parking in the locality.
- 4.24 At present, there are 8 off street car parking spaces and 1 disabled space within the application site. The applicant has identified the provision of bus routes in close proximity to the application site and their links to Wycombe BR train station and surrounding towns. The applicant states that the level of displaced parking would be very low in this instance. The applicant has also stated that the whole building as enlarged would be restricted to student accommodation only. The applicant has suggested that a condition could be imposed preventing student occupants from having a car or the applicant would be willing to enter into a legal agreement, if required.
- 4.25 Despite the applicants willingness to prevent future occupants from owning a car and restricting the use to student accommodation only, concern remains regarding the removal of all of the parking provision (except 1 disabled space) from the site. The recent planning history of the application site reveals the struggles that Buckinghamshire University have experienced in letting out the majority of the current rooms available.
- 4.26 In less than two years following the original planning permission to allow the change of use of the property to student accommodation, the applicant was seeking a relaxation to the planning condition which restricted the occupation of the building to students only. Later in 2017, the applicant successfully sought permission to remove the restrictive occupancy condition completely (Ref 17/08151/VCDN). In their justification for such a request the applicant stated:
- "The current student enrolments at Bucks University, which is much lower than previous years has a massive impact to the student occupancy rates at London House. This year's occupancy rate is at 65%, way below the 90%+ rate we have over the past few years. The large number of empty rooms is an inefficient use of the building and is also impacting the financial viability of our business. We wish to also be able to let to non-students."
- 4.27 This current application provides no evidence that the numbers of students has dramatically risen, since 2017, and that there is now insufficient accommodation

available for enrolled students. Neither is there any evidence that either the existing or enlarged accommodation block will be occupied with students at a rate of 90%+. Furthermore, the proposal to use the whole of the enlarged building has only come about during this current application. No such mention was of the premises being solely occupied by students made in the previous application, for a similar development Ref 20/06957/FUL).

- 4.28 It is therefore reasonable to assume that the existing accommodation block is unlikely to be fully occupied by students. If such a scenario were to be permitted, it is also likely that the Local Planning Authority would be under pressure to allow non-students to reside at the property, or leave a large building unused. As seen above, this argument has been used successfully in the recent past.
- 4.29 Although it would be possible to restrict the occupation of the whole premises to students use, it would be difficult to ensure that none of them owned a car. – either by way of a condition or a legal agreement. Neither the University nor the Local Planning authority could effectively prevent a future student from owning a car and parking it on a public highway close by. Given the lack of unrestricted parking nearby, either the next available on street spaces or the on-site disabled space would be used for parking purposes. This would result in detriment to local residents who rely on the unrestricted spaces in the locality to park their existing vehicles.
- 4.30 On balance, it is considered that the total removal of all parking from such a large building remains unacceptable. It would render the building being incapable of being occupied by anything other than students, and recent history shows how unlikely such a scenario is. Any alternative use would require a degree of off street car parking, or users of the building would find space nearby, in unrestricted streets. Similarly there is now way either the applicant or the Local planning authority could effectively ban all students from owning a car.

Environmental issues

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), DM20 (Matters to be determined in accordance with the NPPF) List relevant policies & SPD

- 4.31 Noise readings have been taken alongside the London Road, and levels have shown that the site falls within an area exposed to traffic noise.
- 4.32 The internal noise levels should adhere to the levels as stated in BS8233:2014 and all habitable rooms fronting, or that have direct exposure to the London Road will need to include acoustic glazing and mechanical ventilation. A planning condition should be imposed that that effect.
- 4.33 The application site lies within an identified Air Quality Management Area. In accordance with the Council's adopted SPD on Air Quality mitigation measures should be provided to reduce air pollution, together with an Air Quality Report for major applications.
- 4.34 In this instance, no air quality report has been provided. However, the provision of Additional cycle facilities and the removal of parking provision from the site could help to mitigate air pollution in the area.

- 4.35 Policy DM33 of the adopted Local Plan requires that new development incorporates renewable technologies within a proposed scheme. The applicant has submitted an energy report in support of this application
- 4.36 The submitted energy report states that the proposed extensions will provide a 2.2% reduction in emission rate over the calculated Target Emissions Rate (building Regulation L2A). This reduction is met by a combination of a thermal envelope and servicing strategy and the use of a community heating system. Given this reduction, no new renewable technologies are to be provided.
- 4.37 Although, this proposal does not provide renewable technologies, in line with Policy DM33, it will result in an overall 2.2% reduction in emissions.

Flooding and drainage

Wycombe District Local Plan (August 2019): DM39 (Managing Flood Risk and Sustainable Drainage Systems)

- 4.38 The application site is not situated within a flood risk area 2 or 3.
- 4.39 The applicant has provided a surface water drainage scheme in support of this application. Following amendments to the submitted scheme, the Local Lead Flood Authority is now satisfied that the proposed scheme is acceptable, in principle. A further detailed SuDS would need to be submitted and approved, in the event that planning permission is granted for this development. A pre-commencement planning condition would be required to this effect.

Ecology

Wycombe District Local Plan (August 2019): DM34 (Delivering Green Infrastructure and Biodiversity in Development)

DSA: DM13 (Conservation and enhancement of sites, habitats and species of biodiversity and geodiversity importance), DM14 (Biodiversity in development).

- 4.40 The building, as converted, is less than 10 years old and it is unlikely to have features suitable to bats.
- 4.41 There is a requirement under policy DM34 to achieve a net gain in biodiversity. It is proposed that this will be achieved through the creation of a lower ground floor garden. As there is very little of ecological value on site at the moment, it is likely that the inclusion of a garden can achieve a biodiversity net gain. A planning condition should be imposed on any subsequent permission to ensure that the landscape/ecological enhancement measures are provided and retained. It would also be possible to provide nesting facilities for birds within the site.

Building sustainability

Wycombe District Local Plan (August 2019): DM41 (Optional Technical Standards for Building Regulations Approval)

- 4.42 It is considered necessary to condition water efficiency in accordance with Policy DM41.

5.0 Weighing and balancing of issues / Overall Assessment

- 5.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.
- 5.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
 - a. Provision of the development plan insofar as they are material,
 - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
 - c. Any other material considerations
- 5.3 As set out above it is considered that the proposed development would fail to accord with development plan policies.
- 5.4 In line with the Public Sector Equality Duty the LPA must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation)
- 5.5 The application provides for a development comprising of the Erection of single storey infill extension to south, 4-storey extension to north and second floor side extension with alterations to building to provide 12 additional bedrooms, new main and level entrance, creation of rear and front garden with improvements to the external appearance of the building and associated works. The development would occur at an existing student/residential accommodation block and no discrimination or inequality would arise from the proposal.
- 5.6 The Human Rights Act 1998 Article 1 the protection of property and the peaceful enjoyment of possessions and Article 8 the right to respect for private and family life, have been taken into account in considering any impact of the development on residential amenity and the measures to avoid and mitigate impacts. It is not considered that the development would infringe these rights.

6.0 Working with the applicant / agent

- 6.1 In accordance with paragraph 38 of the NPPF the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 6.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
 - In this instance, the applicant/agent was provided with pre-application advice. The applicant/agent was updated of any issues after the initial site visit and was informed of the Council's continuing objection to the loss of parking on the application site.

However, the applicant/agent was invited to submit amendments to the development proposal with regard to the amenities of adjacent residents and flooding. The applicant/agent complied and these elements of the development proposal were resolved.

The applicant was informed/ advised how the proposal did not accord with the development plan, that no material considerations are apparent to outweigh these matters.

7.0 Recommendation: Minded to Refuse

7.1 Had the Local Planning Authority been in a position to determine this application, it would have **refused planning permission**, for the following reasons:

1. In the opinion of the Local Planning Authority, the quality of the overall layout of this proposal results in a poor form of development. This would have a detrimental impact upon the future living environment for its occupiers. It would result in a substandard living arrangement for those future occupiers due to a lack of, or poor outlook, a lack of privacy and increased noise and disturbance by other residents. As such, this proposal would be contrary to Policy DM35 (Placemaking and Design Quality) of the adopted Wycombe District Local Plan (August 2019) and the Residential Design Guidance (June 2017).
2. In the opinion of the Local Planning Authority, this proposal would result in the unacceptable loss of off street car parking spaces, which would lead to an increased demand for limited, unrestricted on street parking elsewhere. This increase in demand for on-street car parking would be detrimental to the existing amenities of local residents in the area, who rely on the unrestricted areas of parking. As such, this proposal is contrary to Policies DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality) of the adopted Wycombe District Local Plan (2019).

Informative.

1. In accordance with paragraph 38 of the NPPF2 Buckinghamshire Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments. Buckinghamshire Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.

In this instance, the applicant/agent was provided with pre-application advice. The applicant/agent was updated of any issues after the initial site visit and was informed of the Council's continuing objection to the loss of parking on the application site. However, the applicant/agent was invited to submit amendments to the development proposal with regard to the amenities of adjacent residents and flooding. The applicant/agent complied and these elements of the development proposal were resolved.

The applicant was informed/ advised how the proposal did not accord with the development plan, that no material considerations are apparent to outweigh these matters

APPENDIX A: Consultation Responses and Representations

Councillor Comments

Cllr Baughan:

I have been contacted by a local resident who is concerned about this application. While I note the Applicant is aiming to improve the external appearance of the property, I am also concerned about the effect on neighbours' privacy and daylight, the bulk and scale of the property as proposed and the lack of parking. The London Road A40 is the main route in and out of Wycombe and although the property is on a bus route or an easy walk into town, students in the proposed extended facilities would be having visitors, deliveries, and obviously may well want to have their own car with them. Parking and air quality are issues that are of concern to local residents. I do feel this application would benefit from being discussed by the Planning Committee.

Consultation Responses

Highway Authority: No objections

Environmental Services: No Objections, subject to conditions regarding noise attenuation.

Environment Agency: None received

Local Lead Flood Authority: No objection subject to conditions

Representations

Objections have been received from local residents on the following grounds:

- Overdevelopment
- Loss of light
- Loss of privacy
- Loss of parking
- Inadequate off street car parking in locality

APPENDIX B: Site Location Plan

21/07275/FUL
Scale 1/1250



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