



Update Report to South Area Planning Committee – Following Deferral on Tuesday 17th October 2023

Application Number:	PL/23/0411/FA
Proposal:	Demolition of existing house and outbuildings and erection of a block of 6 flats with associated parking, cycle and bin provision and widening of existing vehicular access
Site location:	Firdene Oxford Road Denham Buckinghamshire SL9 7AP
Applicant:	Ms M Gardiola
Case Officer:	Mr Graham Mansfield
Ward affected:	Denham
Parish-Town Council:	Denham Parish Council
Valid date:	13 February 2023
Determination date:	21 May 2023 (Extension of time: 17 th November 2023)
Recommendation:	Conditional permission.

1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The application seeks planning permission for the redevelopment of the site to erect a three-storey building accommodating 6 flats with associated parking, cycle and bin storage and widening of the existing vehicular access.
- 1.2 The application has been referred for determination by South Area Planning Committee following it being called in by Councillor Hollis and Denham Parish Council.
- 1.3 The application was considered at the South Buckinghamshire Area Committee on 17th October 2023 and the decision was deferred to enable further clarification/information to be provided in relation to the parking and highway impacts of the proposal.
- 1.4 The previous Planning Committee report is attached at Appendix A and the recommendation for this application remains conditional permission.

2.0 Update since previous Planning Committee on 17th October 2023

- 2.1 At the previous Committee Meeting, members raised queries that the proposed development would appear to be contrary to the parking standards as set out in the adopted document Buckinghamshire Countywide Parking Guidance (BCPG) 2015. Questions were raised on whether the proposed development has been assessed correctly against the Council's adopted parking standards. The proposed development would provide one parking space per flat (a total of six).
- 2.2 Following the previous Committee meeting the applicant has provided a Transport Technical Note and in addition, Highways Officers have re-visited the proposed development in relation to the application of the adopted parking standards.
- 2.3 As highlighted above the applicant has provided a Transport Technical Note which can be found at Appendix B. In summary, this note provides comment on census data relating to car ownership for which the Council's adopted Parking Standards are based. It should be noted that the adopted 2015 BCPG Standards are based on 2001 census data.
- 2.4 Further, the applicant has provided the census data for car ownership based on the 2021 data set which is specific to the Denham Ward (as obtained from the Office of National Statistics (ONS)). This dataset shows that flat occupants in the Denham Ward have between 0.90 and 0.95 cars per flat, and based on this the quantum of parking for the proposed development is therefore acceptable.
- 2.5 The Council's Highway Officer has reviewed the submitted transport note and concurs with the findings. Based on the most up to date census data, the proposed development would provide an appropriate level of parking of one space per unit.
- 2.6 In addition, Highway Officers have provided comments on the adopted BCPG and the application of the standards on the subject proposal. These are set out as follows:
- 2.7 'The Buckinghamshire Countywide Parking Guidance (BCPG) policy document was adopted as policy in September 2015, and has been utilised to provide guidance on parking provision for proposed developments in the legacy Wycombe district since that time. In addition, since the inception of Buckinghamshire Council, the use of the BCPG has since been proliferated throughout the Chiltern (East) and South Bucks (South) areas.
- 2.8 A driving force for the publication of the BCPG was the consensus was that many elements of the historical parking standards were outdated, inclusive of how provision for new developments was calculated, the base data used to underpin the standards and the dimension of spaces themselves. As a result, the BCPG contained standards based upon Census data, Use Class surveys, parking accumulation data, modern vehicle dimensions and reviews of other authority's parking standard guidance and information on what was observed to be good practice and areas where it was deemed to fall short.
- 2.9 The decision was taken for the BCPG parking guidance to be based upon Census-extrapolated data on habitable rooms and its relation to the number of vehicles recorded per household. Using this criteria meant that there was more evidence to support the application of standards based upon credible and current data. However, in acknowledging that residential standards had previously been based upon the number of bedrooms per dwelling, this element was referenced by providing a relatable transition point for those used to determining parking standards on older criteria. It is anticipated that when the current BCPG standards are reviewed, reference to using

bedrooms to decide residential parking standards will support the removal of the bedroom-to-dwelling metric.

- 2.10 Furthermore, and like most guidance and policy, there are minor components therein that have been subjected to test on appeal and direction from Planning Authorities in terms of their practical application since the BCPG was adopted as policy. Although the guidance has generally held up well to scrutiny, parking standards have been based upon habitable rooms for the majority of the last eight years. Although there are various reasons as to why this has been the status quo for the majority of its lifespan thus far, it was felt that the Census data provides more of an evidence-based approach than bedrooms per dwelling. In addition, flatted developments are often located in areas with better access to sustainable means of transport and local services, in addition to generating fewer daily vehicle movements when compared with houses.
- 2.11 Turning toward the development sought as part of this application, both habitable accommodation and bedrooms per unit were noted for each proposed dwelling, in particular the two ground floor units with three beds each. Given the historically tested and robust position of using habitable floor space over bedrooms, in addition to the majority of the proposed flats having open-plan rooms that could not practically be subdivided, the decision was taken by the Highway Authority to comment upon parking standards as habitable rooms per unit, resulting in the figure of 6(no) spaces per dwelling and consistent with dwellings with four habitable rooms or less for a site residing within Zone B. One should also note that the site is in close to two bus stops used for two high-frequency services to Uxbridge/Heathrow and High Wycombe respectively.
- 2.12 Even in a 'worse case scenario' whereby each flat generated the need for two spaces rather than the one each that has been demonstrated, there is no demonstrable harm that the displacement of (6no) vehicles onto the local network. As the only recorded Personal Injury Accident (PIA) in the vicinity of the site was due to a lack of driver attention to a motorcycle (at a midpoint position between the application site and the A40/Pinstone Way junction), there is insufficient evidence to suggest that such a level of parking displacement would be detrimental to highway safety.
- 2.13 For the reasons above, the Highway Authority do not believe that each flat would require two parking spaces each due to its experience of deploying the guidance for apartment developments over the last eight years (of which a great many have been built and occupied. Ergo, we maintain our position of no objections to this application (subject to conditions) due to the lack of evidence to support such an objection on safety, convenience of use or network capacity issues.'
- 2.14 Overall, and in light of the above, the proposed development would be acceptable in terms of parking provision. Therefore, the proposed development would not result in unacceptable impacts on highway safety, or severe residual cumulative impacts on the road network in line with paragraph 111 of the NPPF.

3.0 Recommendation: Conditional Permission

Subject to the following conditions:

1. The development to which this permission relates must be begun not later than the expiration of three years beginning from the date of this decision notice.
Reason: To comply with the provisions of Section 91(1)(a) of the Town and Country Planning Act 1990. (SS01A)

2. No development shall take place above ground level until a schedule of external facing materials to be used in the elevations of the development hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved details. (SM01)
Reason: To safeguard and enhance the visual amenities of the locality. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
3. Prior to the commencement of the development above ground level a specification of all finishing materials to be used in any hard surfacing of the application site shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be constructed using the approved materials. (SM02)
Reason: To ensure that such works do not detract from the development itself or from the appearance of the locality in general. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
4. Notwithstanding any indications illustrated on drawings already submitted, no development shall take place above ground level until a scheme of landscaping which shall include indications of all existing trees, shrubs and hedgerows on the site and details, including crown spreads, of those to be retained has been submitted to and approved in writing by the Local Planning Authority. None of the trees, shrubs or hedgerows shown for retention shall be removed or felled, lopped or topped within a period of five years from the date of this permission, without the prior written permission of the Local Planning Authority. (ST01)
Reason: To ensure satisfactory landscaping of the site in the interests of visual amenity. (Policies EP3 and EP4 of the South Bucks District Local Plan (adopted March 1999) refer.)
5. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the occupation of the development hereby permitted or the substantial completion of the development, whichever is the sooner. Any trees, hedgerows or shrubs forming part of the approved landscaping scheme which within a period of five years from the occupation or substantial completion of the development, whichever is the later, die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation. (ST02)
Reason: To ensure a satisfactory and continuing standard of amenities are provided and maintained in connection with the development. (Policies EP3 and EP4 of the South Bucks District Local Plan (adopted March 1999) refer.)
6. No works or development shall take place until details of the proposed finished floor levels of the Proposed Development and of finished ground levels in relation to the surrounding Dwellinghouses have been submitted to and approved in writing by the Local Planning Authority. Thereafter the development shall be implemented and retained in accordance with these approved details. (SD16)
Reason: To ensure that construction is carried out at suitable levels having regard to the amenities of neighbouring properties. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)
7. No works (other than demolition) shall not begin until a surface water drainage scheme for the site, based on the Sustainable Drainage System Strategy (SWDS - 2023 - 000019, rev. 1.1, 26 July 2023, STM Environmental) has been submitted to and approved in writing

by the Local Planning Authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall also include:

- Water quality assessment demonstrating that the total pollution mitigation index equals or exceeds the pollution hazard index; priority should be given to above ground SuDS components
- SuDS Components agreed in the Layout of Network (drawing no. PRV/003224)
- Construction details of all SuDS and drainage components
- Details of proposed overland flood flow routes in the event of system exceedance or failure, with demonstration of flow direction

Reason: The reason for this construction condition is to ensure that a sustainable drainage strategy has been agreed prior to construction in accordance with Paragraph 167 of the National Planning Policy Framework to ensure that there is a satisfactory solution to managing flood risk.

8. The development shall be implemented in accordance with the agreed bat mitigation measures as detailed in the Bat Emergence Survey report (Wychwood Environmental, June 2023). The condition will be considered discharged following; a written statement from the ecologist acting for the developer testifying to the plan having been implemented correctly.

Reason: To safeguard protected species that may otherwise be affected by the development.

9. No development shall take place (including demolition, ground works, vegetation clearance) unless and until the Landscape and Ecological Management Plan (LEMP) has been submitted to and approved in writing by the local planning authority. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed, including integrated bat boxes and swift boxes.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management which will (without limitation) include the provision of biodiversity net gain within the Site as shown within the Biodiversity Gain Plan.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall be for no less than 30 years. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details. Reason: In the interests of improving biodiversity in accordance with NPPF and Core Policy 9: Natural Environment of the South Bucks District Core Strategy and ensuring that the development achieves net gain.

The scheme for parking and manoeuvring indicated on the submitted plans shall be laid out prior to the initial occupation of the development hereby permitted and that area shall not be used for any other purpose.

Reason: To enable vehicles to draw off, park and turn clear of the highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

12. Prior to the commencement of any works on the site, a Construction Traffic Management Plan detailing the management of construction traffic (including vehicle types, frequency of visits, expected daily time frames, use of a banksman, on-site loading/unloading arrangements and parking of site operative's vehicles) shall be submitted and approved in writing by the Planning Authority in consultation with the Highway Authority. Thereafter, the development shall be carried out in accordance with such approved management plan.

Reason: This is a pre-commencement condition as development cannot be allowed to take place, which in the opinion of the Highway Authority, could cause danger, obstruction and inconvenience to users of the Highway and of the development.

13. No other part of the development shall be occupied until the existing means of access has been altered in general accordance with the approved planning drawing and constructed to the appropriate Buckinghamshire Council access standards.

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

14. No works or development (including for the avoidance of doubt any works of demolition) shall take place until a tree constraints plan and method statement (in accordance with British Standard 5837:2012 'Trees in relation to design, demolition and construction'(or any replacement thereof or EU equivalent)) has been submitted to and approved in writing by the Local Planning Authority. The method statement shall provide, as required, details of a no dig driveway; phasing of demolition and construction operations; siting of work huts and contractor parking; areas for the storage of materials and the siting of skips and working spaces; the erection of scaffolding. Protective fencing detailed in the method statement shall consist of a vertical and horizontal scaffold framework, braced to resist impacts, with vertical tubes spaced at a maximum level of 3m. On to this, weldmesh panels shall be securely fixed with wire scaffold clamps. The fencing shall be erected to protect existing trees and other vegetation during construction and shall conform to British Standard 5837:2012 'Trees in Relation to Construction' or any replacement thereof or EU equivalent. The approved fencing shall be erected prior to the commencement of any works or development on the site including any works of demolition. The approved fencing shall be retained and maintained until all building, engineering or other operations have been completed. No work shall be carried out or materials stored within the fenced area without prior written agreement from the Local Planning Authority. (ST17A)

Reason: To ensure that the crowns, boles and root systems of the shrubs, trees and hedgerows are not damaged during the period of construction and in the long term interests of local amenities. (Policies EP3 and EP4 of the South Bucks District Local Plan (adopted March 1999) refer.)

15. Prior to any development above a ground level, a detailed written scheme for protecting the proposed development from transportation noise from nearby traffic sources shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall

comprise of such measures as are necessary to ensure compliance in general terms with BS 8233:2014 standards. Thereafter, the development shall be carried out in strict accordance with the approved scheme which shall be completed before any part of the accommodation hereby approved is occupied. The approved scheme shall thereafter be maintained.

Reason: To safeguard the amenities of future occupiers of dwellings

16. The first floor windows in the east and west elevation(s) of the development hereby permitted shall be of a permanently fixed, non-opening design, and shall be fitted and permanently maintained with obscure glass. (SD09)

Reason: To prevent overlooking and loss of privacy in the interests of the amenities of the adjoining properties. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)

17. The first floor roof areas of the development hereby permitted shall not be used as a balcony, roof garden, sitting out area or similar amenity area without the grant of further specific permission from the Local Planning Authority. (SD11)

Reason: To preserve the privacy and amenities of the adjacent property occupiers. (Policies EP3 and H11 of the South Bucks District Local Plan (adopted March 1999) refer.)

18. No further windows shall be inserted at or above first floor level in the Flank elevation(s) of the development hereby permitted. (SD17)

Reason: To prevent overlooking and loss of privacy in the interests of the amenities of the adjoining properties. (Policy EP3 of the South Bucks District Local Plan (adopted March 1999) refers.)

19. The development hereby permitted shall be designed and constructed to meet a water efficiency standard of no more than 110 litres per head per day.

Reason: The site is in an area of serious water stress requiring water efficiency opportunities to be maximised; to mitigate the impacts of climate change; in the interests of sustainability; and to use natural resources prudently, and in accordance with Policy 13 the South Bucks Core Strategy (adopted February 2011) and Section 14 of the National Planning Policy Framework, 2023.

20. This permission relates to the details shown on the approved plans as listed below:

List of approved plans:

<u>Received</u>	<u>Plan Reference</u>
19 Apr 2023	OR-AP1-105 Rev A
19 Apr 2023	OR-AP1-106 Rev A
19 Apr 2023	OR-AP1-107 Rev B
19 Apr 2023	OR-AP1-108 Rev 1st
19 Apr 2023	OR-AP1-109 Rev 1st
19 Apr 2023	OR-AP1-110 Rev 1st
19 Apr 2023	OR-AP1-111 Rev 1st
19 Apr 2023	OR-AP1-112 Rev 1st

Appendix B: Applicants Transport Technical Note

TRANSPORT TECHNICAL NOTE

PROJECT	P2310.5 FIRDENE, OXFORD ROAD, DENHAM, SL9 7AP
DATE	OCTOBER 2023
REASON	FULL PLANNING
AUTHOR	ALEXANDER OSBORN BSC HONS, PG DIP, CMILT, FCIHT, FIHE

KRONEN has been instructed to prepare this Technical Note assessing off-street parking provisions to support proposals at Firdene, Oxford Road, Denham, SL9 7AP.

The site is the subject of planning application "PL/23/0411/FA" for the "Demolition of existing house and outbuildings and erection of a block of 6 flats with associated parking, cycle and bin provision and widening of existing vehicular access".

The application seeks 6 × flats comprising 2 × 3-bedroom 4-person flats, 2 × 2-bedroom 4-person flats and 2 × 2 × 2-bedroom 3-person flats. The application includes 6 × parking spaces, 1 × space per flat.

The application was heard at Buckinghamshire Council South Area Planning Committee on 17 October 2023.

The application had officers' recommendation for approval and Committee members voted to defer the application to consider planning and highways officers' application of parking standards.

The Committee report stated:

"Transport matters and parking
Core Strategy Policies:
CP7 (Accessibility and transport)
Local Plan Saved Policies:
TR5 (Access, highways work and traffic generation)
TR7 (Traffic generation)
Buckinghamshire Countywide Parking Standards (2015)

5.12 A number of comments have raised concerns regarding the parking for the proposed development. In terms of the parking provision, the proposed development contains 6 residential units, with each being served by one parking space.

5.13 Flatted developments with 4 habitable rooms would require 1 parking space in accordance with the Buckinghamshire Parking Guidance and Highways officer have raised no concerns on this basis. In terms of sustainable transport, it is noted that the development is located in an area served by bus routes on the A40 providing connections to Uxbridge, Gerrards Cross and Beaconsfield. In addition, the development would be served by cycle spaces in accordance with the Council's guidance.

5.14 During the course of the application, the proposed access point was amended to ensure that vehicles could pull off an onto the A40 without compromising the safety of Highway users. As such, there are no outstanding concerns in terms of Highway safety.

5.15 Overall, the proposed development would not result in any concerns in terms of highway and parking matters that would warrant refusal of the scheme and this is attributed neutral weight in the planning balance.”

This Note investigates parking provisions.

Buckinghamshire Countywide Parking Standards (2015) does not provide a minimum or maximum standard but a concept of an “optimum standard”.

There are fairly difficult to interpret maps with a zoning system within the guidance.

Table 5 of the guidance includes standards for habitable rooms / number of bedrooms.

These factors invite a degree of ambiguity.

It is noted that the standards are approaching ten years old, published 2015, and are based on 2001 Census data:

“6.3 Calculating Residential car parking

The residential parking standards are based on actual car ownership levels, dwelling numbers and bedroom numbers across the county. This information was used to calculate the number of spaces required for the different dwelling types in each of the three zones.

Current car ownership levels in existing developments across the three zones was calculated to ensure that the new standards provide the appropriate level of parking for different development types across the county. The most comprehensive data source to provide this information is the 2001 Census from the Office of National Statistics (ONS), as the most recent Census Data (2011) does not yet provide a cross tabulation of the relevant data. As the increase in average car ownership per household across the county has been relatively small between 2001 and 2011, this was not considered to compromise the quality of the data.

The Census data is based on habitable rooms (the Census definition includes kitchens, living rooms, bedrooms, utility rooms and studies. It does not include bathrooms, toilets, halls, landings or rooms for storage), and therefore, number of habitable rooms has been used for all calculations. However, as people are more familiar with number of bedrooms, table 2 provides an approximate conversion between bedrooms and habitable rooms for the information of users of this guidance.”

It is anticipated that the 2001 dataset used was a specialist “CT” “Commissioned Table” dataset which had been made publicly available.

Recently released Census 2021 data has been analysed for this Note: RM001 Accommodation type by car or van availability.

The data for flats for the local “output area” as well as the Ward and Authority are enclosed in raw format and with analysis calculating the number of cars per flat.

As shown in the analysed data, flat occupants have between 0.90 and 0.95 cars per flat.

This would suggest that the proposals’ parking would accommodate parking demand likely to be generated.

The use of Census data reflects direction given in the “National Planning Policy Framework”(DHLUC, 2023) which states “local car ownership levels” should be taken into account when considering residential parking.

(There are no publicly available specialist "CT" "Commissioned Table" datasets using Census 2021 data showing car ownership by number of habitable rooms yet.)

With regards to transport impacts Paragraph 111 of the National Planning Policy Framework includes guidance of only preventing or refusing development on transport grounds where "there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".

Evidence from the recent 2021 Census projects the proposals would have no parking impact on the public highway and in this context and the proposal is therefore considered acceptable / not objectionable in a planning context.

APPENDIX C: Council Highway Officer Response

The *Buckinghamshire Countywide Parking Guidance* (BCPG) policy document was adopted as policy in September 2015, and has been utilised to provide guidance on parking provision for proposed developments in the legacy Wycombe district since that time. In addition, since the inception of Buckinghamshire Council, the use of the BCPG has since been proliferated throughout the Chiltern (East) and South Bucks (South) areas.

A driving force for the publication of the BCPG was the consensus was that many elements of the historical parking standards were outdated, inclusive of how provision for new developments was calculated, the base data used to underpin the standards and the dimension of spaces themselves. As a result, the BCPG contained standards based upon Census data, Use Class surveys, parking accumulation data, modern vehicle dimensions and reviews of other authority's parking standard guidance and information on what was observed to be good practice and areas where it was deemed to fall short.

The decision was taken for the BCPG parking guidance to be based upon Census-extrapolated data on habitable rooms and it's relations to the number of vehicles recorded per household. Using this criteria meant that there was more evidence to support the application of standards based upon credible and current data. However, in acknowledging that residential standards had previously been based upon the number of bedrooms per dwelling, this element was referenced by providing a relatable transition point for those used to determining parking standards on older criteria. It is anticipated that when the current BCPG standards are reviewed, reference to using bedrooms to decide residential parking standards will support the removal of the bedroom-to-dwelling metric.

Furthermore, and like most guidance and policy, there are minor components therein that have been subjected to test on appeal and direction from Planning Authorities in terms of their practical application since the BCPG was adopted as policy. Although the guidance has generally held up well to scrutiny, parking standards have been based upon habitable rooms for the majority of the last eight years. Although there are various reasons as to why this has been the status quo for the majority of its lifespan thus far, it was felt that the Census data provides more of an evidence-based approach than bedrooms per dwelling. In addition, flatted developments are often located in areas with better access to sustainable means of transport and local services, in addition to generating fewer daily vehicle movements when compared with houses.

Turning toward the development sought as part of this application, both habitable accommodation and bedrooms per unit were noted for each proposed dwelling, in particular the two ground floor units with three beds each. Given the historically tested and robust position of using habitable floor space over bedrooms, in addition to the majority of the proposed flats having open-plan rooms that could not practically be sub-divided, the decision was taken by the Highway Authority to comment upon parking standards as habitable rooms per unit, resulting in the figure of 6(no) spaces per dwelling and consistent with dwellings with four habitable rooms or less for a site residing within Zone B. One should also note that the site is in close to two bus stops used for two high-frequency services to Uxbridge/Heathrow and High Wycombe respectively.

Even in a 'worse case scenario' whereby each flat generated the need for two spaces rather than the one each that has been demonstrated, there is no demonstrable harm that the displacement of (6no) vehicles onto the local network. As the only recorded Personal Injury Accident (PIA) in the vicinity of the site was due to a lack of driver attention to a motorcycle

(at a midpoint position between the application site and the A40/Pinstone Way junction), there is insufficient evidence to suggest that such a level of parking displacement would be detrimental to highway safety.

For the reasons above, the Highway Authority do not believe that each flat would require two parking spaces each due to its experience of deploying the guidance for apartment developments over the last eight years (of which a great many have been built and occupied. Ergo, we maintain our position of no objections to this application (subject to conditions) due to the lack of evidence to support such an objection on safety, convenience of use or network capacity issues.

Yours sincerely

Matthew Hardy

**Highways Development Management Team Leader (West, South and East)
Planning Growth & Sustainability**