AGENDA ITEM NO 6

REPORT NO 149/21

ANGUS COUNCIL

DEVELOPMENT STANDARDS COMMITTEE – 18 MAY 2021

PLANNING APPLICATION – INGLIS COURT LINDSAY PLACE EDZELL

GRID REF: 360312:768802

SERVICE LEADER – PLANNING & COMMUNITIES

Abstract:

This report deals with planning application No <u>20/00828/FULL</u> for the demolition of sheltered housing, erection of 21 affordable homes and ancillary works at Inglis Court, Lindsay Place, Edzell for Angus Council. The application is recommended for approval subject to conditions.

1. **RECOMMENDATION**

It is recommended that the application be approved for the reason and subject to the conditions given in Section 10 of this report.

2. ALIGNMENT TO THE ANGUS LOCAL OUTCOMES IMPROVEMENT PLAN/CORPORATE PLAN

This report contributes to the following local outcome(s) contained within the Angus Local Outcomes Improvement Plan and Locality Plans:

- Safe, secure, vibrant and sustainable communities
- A reduced carbon footprint
- An enhanced, protected and enjoyed natural and built environment

3. INTRODUCTION

- 3.1 The applicant seeks full planning permission for a residential development of 21 dwellings and associated works at Inglis Court, Lindsay Place, Edzell. A plan showing the location of the site is provided at Appendix 1.
- 3.2 The application site measures around 4730sqm and is currently occupied by the Inglis Court sheltered housing complex. That complex contains 24 flatted dwellings and a house and would be demolished to accommodate the new development.
- 3.3 The new development would provide 21 dwellings comprising 10No 1-bed flats, 2No 1bed houses, 2No 2-bed flats, 5No 2-bed houses, and 2No 3-bed houses. Accommodation would be provided over one and two levels, with four of the properties being single storey. The dwellings would be contained within detached, terraced and flatted buildings arranged around a central courtyard area that would provide private garden space and communal private garden space to serve the dwellings. An area of woodland to the west of the site would be retained and would provide informal amenity space. Car parking would comprise a combination of in-curtilage, parking-court, and onstreet provision with 20 spaces proposed.

- 3.4 The buildings would have pitched roofs which would be finished in a combination of natural blue/grey and red/brown coloured tiles. The external walls would be finished in a combination of white or red coloured wet dash render and grey coloured cladding. The boundary treatments would consist of a mixture of brick walls, shrubs, hedges and timber fences.
- 3.5 The proposal has been amended to alter the proposed building elevations; to amend private garden provision; and to increase parking provision from 17 to 20 spaces.
- 3.6 The application was subject of neighbour notification and was advertised in the local press.

4. RELEVANT PLANNING HISTORY

There is no relevant planning history.

5. APPLICANT'S CASE

The applicant has submitted a Bat Survey Report, a Design and Access Statement, a Design Statement, a Phase 2 Ground Investigation – Addendum Interpretative Report, and a Tree Survey Report in support of the planning application. These documents are available to view on the council's <u>Public Access</u> website and are summarised at Appendix 2.

6. CONSULTATIONS

- 6.1 **Angus Council Roads** has confirmed no objection subject to condition.
- 6.2 **Angus Council Environmental Health** has confirmed no objection subject to condition.
- 6.3 **Scottish Water** has confirmed no objection.
- 6.4 **Inveresk Community Council** has objected on the grounds that the existing building should be retained and utilised as a form of sheltered housing with a warden/tenancy support officer, or as a form of retirement housing with some level of tenancy support officer, or as a form of affordable housing through its refurbishment and reuse. Concerns are also raised regarding the potential letting policy for the affordable homes, insufficient vehicular parking provision, disturbance and adverse vehicular traffic and parking impacts caused during construction, adverse vehicular traffic impacts caused post construction particularly on Duriehill Road, and responsibility for maintenance of private amenity areas. *The full representation is included at Appendix 3.*

7. **REPRESENTATIONS**

- 7.1 Eight letters of representation have been received. Seven offer objection and one makes general comments. The letters are provided at Appendix 3 and copies are available to view on the council's <u>Public Access</u> website.
- 7.2 The issues raised are summarised below: -
 - existing building should be retained and adapted rather than demolished;
 - demolition of the building is not lawful and does not represent sustainable

development or appropriate use of public funds;

- surveys indicate public opposition to demolition;
- no structural survey of the existing building has been provided;
- the council should review its sheltered housing policy;
- redevelopment of the site does not comply with development plan policy;
- adequate land elsewhere to meet affordable housing need;
- no need for social housing and house types are unsuitable to meet need;
- design and layout does not comply with council policy and guidance;
- adverse impact on amenity, including noise and disturbance from construction;
- lack of transport assessment, impact on road safety, and inadequate parking provision;
- existing trees impact adversely on amenity of residents.

These matters are addressed below.

8. PLANNING CONSIDERATIONS

- 8.1 Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 require that planning decisions be made in accordance with the development plan unless material considerations indicate otherwise.
- 8.2 In this case the development plan comprises:-
 - <u>TAYplan</u> (Approved 2017)
 - Angus Local Development Plan (ALDP) (Adopted 2016)
- 8.3 The application is not of strategic significance and the policies of TAYplan are not referenced in this report. The relevant policies of the ALDP are provided in Appendix 4 and have been considered in the preparation of this report.
- 8.4 The site is located within the Edzell Development Boundary as defined by the ALDP. Policy DS1 states that proposals on sites not allocated or otherwise identified for development, but within development boundaries, will be supported where they are of an appropriate scale and nature.
- 8.5 The proposal involves demolition of the existing sheltered housing complex that occupies the site and much of the comment submitted in relation to the proposal relates to that matter.
- 8.6 The applicant has submitted information that indicates why the building is not considered appropriate for retention and adaptation, and has indicated that the proposal would provide new, energy efficient, and adaptable affordable housing. It indicates that the proposal provides social, economic, and environmental benefits. Those making comment on the application raise issues about the appropriateness of the decision to demolish the building, the consultation around that decision, and question whether it represents best value or good use of public funds. They also highlight a degree of apparent public opposition to the proposed demolition and question whether it represents a sustainable form of development.
- 8.7 However, that information, comment and opposition must be considered in the context that the existing building is not listed; it is not within a conservation area; it is not of any special architectural, historic, or cultural significance; and is not located in an area where demolition would cause significant harm to townscape. There are no development plan

policies that seek to retain or prevent demolition of a building of this nature or that require consideration of its structural condition. The demolition of the existing building does not by itself constitute development that requires the prior grant of planning permission; it could be demolished utilising permitted development rights irrespective of any decision that may be made on this planning application. The legality of any decision by the applicant to demolish the building and matters around the applicant's funding of the development are not relevant to the determination of this application.

- 8.8 In these circumstances, objections regarding demolition of the existing building are considered to carry little weight. Demolition of the building is not contrary to development plan policy. However, it is appropriate to require a demolition and construction management plan, including a site waste management plan in order to control the method of demolition, remediation of the site if redevelopment is delayed, and to ensure that waste generation is minimised during the demolition and construction process. Conditions relating to these matters are proposed along with conditions to control noise and vibration associated with the development.
- 8.9 Policy TC1 states that the council will support proposed residential development on appropriate sites as set out in Policy TC2 in order to support delivery of a generous supply of effective housing sites and introduce additional flexibility. Policy TC2 deals with residential development proposals and indicates that proposals for new residential development within development boundaries will be supported where the site is not allocated or protected for another use and the proposal is consistent with the character and pattern of development in the surrounding area. It also requires new residential development to be compatible with surrounding land use; provide a satisfactory residential environment; not result in unacceptable impact on the built and natural environment, surrounding amenity, access and infrastructure; and include provision for affordable housing in accordance with Policy TC3 Affordable Housing.
- 8.10 The site is not allocated or otherwise identified for development in the ALDP, but it does contain a vacant building most recently used to provide residential accommodation. The surrounding area is predominantly residential in character and residential use of the site remains appropriate and compatible with surrounding land uses.
- 8.11 A range of house types and sizes are proposed that would provide between one and three-bedroom accommodation provided within detached, semi-detached, and terraced buildings. It would provide single storey buildings and properties provided over 2-storeys that would accommodate a mixture of houses and flatted dwellings. The buildings would be arranged in a perimeter block manner with the principal elevations facing the public road and a footpath that would be created to the south and west. The internal area of the perimeter block would accommodate private garden areas for several dwellings and a larger communal garden area. A screened communal drying area would be provided and some of the properties would have small front garden areas. An existing woodland area to the west of the development would be retained and would provide informal amenity space for the development.
- 8.12 Private space associated with the dwellings varies within the development. Some flatted dwellings have no private outdoor space while others have areas that exceed the council's suggested standard of 25sqm per unit. Private amenity space associated with the proposed houses is generally below both 100sqm and the total floor area of the dwellings. However, the council's design and placemaking supplementary guidance recognises that in some instances communal provision may be appropriate. In this instance the combination of private and communal space provision is consistent with the council's spatial standards and forms an integral part of the proposed design solution in

response to the nature of the accommodation to be provided. Each property would have access to safe and secure amenity space as well as a dedicated storage area for bins. The applicant has indicated that all ground floor flats, and single storey properties would have internal arrangements which would meet the housing for varying needs wheelchair standard. In addition, it is indicated that the buildings would exceed current technical standards for energy efficiency and would avoid the use of fossil fuel energy systems.

- The building types proposed are fairly traditional in appearance with pitched roofs, gable 8.13 ends and simple rectilinear openings. The perimeter block layout and use of a small walkable lane with boundary walls and hedging is reflective of the character of the village. Several properties would feature external stairs and while these are not a particular feature of the village, they are not inappropriate in the context of the area or its surroundings. These external stairs provide opportunity for discrete bin storage and, along with proposed boundary hedges, would assist in reducing the prominence of cars parked within the curtilage of dwellings. The proposed palette of external materials is complementary to those in the general area and is acceptable. The general distribution and spacing of buildings are also appropriate having regard to council design guidance. In instances where proposed windows would be close to walls the applicant has provided information to demonstrate that recognised daylight and sunlight standards would be met. Overall, the proposed layout would provide a good standard of amenity for future occupants. The design provides an imaginative and reasonably high-guality response to the site and is compatible with the council's design policies. It does not give rise to any significant issues in terms of relevant supplementary guidance.
- 8.14 The redevelopment of the site would have some impact on the amenity of those that live in the area. Issues in relation to impacts directly associated with demolition are addressed above. In relation to the proposed new buildings, the separation distances between them and existing dwellings exceed those required by the council's design guidance and associated impacts are not considered unacceptable. A condition is proposed to prevent the formation of any additional windows or other openings above ground floor level in the south facing elevations of those buildings that are closest to the boundary with existing properties at Duriehill Road. The development would generate traffic movement in the area both during demolition/ construction activity and upon completion and occupation of the dwellings. However, the site is accessed by public roads and it is not unusual for development of this nature and scale to take place within urban areas without significant impact on amenity of existing residents. Demolition and construction impacts would be of relatively short duration, and vehicular traffic associated with the 21 dwellings proposed would not be materially different from that which could be associated with the 25 residential units in the building to be demolished if it was used to accommodate affordable housing. It is not unusual for development to take place within towns and villages and for new development to take place in the vicinity of existing property. In this case the proposal is not considered to give rise to any unacceptable impacts on the amenity of those that currently live in the area. As indicated above, conditions are proposed that seek to ensure demolition and construction impacts are not unacceptable.
- 8.15 The application site is not subject of any built heritage designation. The general layout and design of the development is acceptable as discussed above and the proposal does not give rise to any unacceptable impacts in terms of built environment considerations.
- 8.16 The application site is not subject of any natural heritage designation. A bat survey has been submitted and it identifies the presence of soprano pipistrelle non-maternity summer roosts within the building. The survey indicates that the demolition of the building would result in a low impact on the conservation status of the species and that

the impact can be reduced through the implementation of appropriate mitigation, including installation of bat boxes on nearby trees. The survey also identifies that the building may be used by nesting birds and suggests appropriate mitigation. Appropriate mitigation and biodiversity enhancement can be secured by condition.

- 8.17 The redevelopment of the site would affect around 19 trees, with five removed for arboricultural reasons and six with potential to be transplanted. Those trees are generally ornamental in nature and add to the pleasantness of the area. However, given their location and limited height they do not make any significant contribution to the wider landscape. A stand of trees in the west of the site is more significant in terms of the wider townscape and would largely be retained and incorporated into the development as amenity space. Compensatory and replacement planting is proposed and the provision of that planting can be secured by planning condition. The proposed dwellings within the development would be orientated such that they would provide natural surveillance of the amenity and open space areas around the site. The proposal is not considered to give rise to any unacceptable impacts on natural heritage interests subject to the proposed conditions set out below.
- 8.18 The site is served by public roads and footways. It has good accessibility to the wider village by established pedestrian routes. Some of the properties would be able to provide cycle storage within private areas but limited detail on cycle parking provision has been provided. However, given the nature of the site there is no reason to consider that suitable cycle parking provision could not be provided, and the matter can be dealt with by condition. The proposal provides 20 car parking spaces, including 3 disabled bays and the roads service has confirmed that complies with the council's roads standards. The existing building on the site accommodates 25 residential units and the proposal would see that reduced to 21 dwellings. While the specific nature and configuration of the accommodation would change, and the proposal would result in additional vehicular movement in comparison to existing use, the overall volume of traffic would remain reasonably low and the roads service has confirmed that it has no objection to the proposal.
- 8.19 The applicant proposes to connect the dwellings to the public sewer for foul drainage and to connect to the public water supply. This is appropriate within the development boundary. Scottish Water has indicated it has no objection to the proposal. Surface water drainage would be dealt with by SUDS with attenuation provided within the central communal garden area. The detail of the SUDS would be controlled through the building regulations and associated warrant process, but a condition is proposed requiring provision of that detail to ensure compliance with development plan policy. Overall, the proposed drainage arrangements are compatible with relevant policy requirements.
- 8.20 The proposal is for affordable housing and does not give rise to any requirement for developer contributions in terms of the council's supplementary guidance on developer contributions and affordable housing. A planning condition is proposed to ensure that the properties are provided and maintained as affordable housing.
- 8.21 The proposal does not give rise to any other significant issues in terms of development plan policy and it is of a scale and nature appropriate for the location. The application complies with the development plan.
- 8.22 In relation to other considerations it is appropriate to have regard to matters raised in letters of objection.
- 8.23 Representations suggest that the proposal does not comply with development plan

policy. However, the application site is within a development boundary and the council's policies positively support proposals for residential development within these areas where they are compatible with policy TC2. For the reasons detailed above the proposal is considered compliant with relevant policy provisions. There is clear and evidenced need for additional affordable housing within the North Angus Housing Market Area. The applicant is a recognised and experienced social housing provider and is well placed to identify the house types and sizes required to meet identified housing need. Information indicates there are in the region of 215 people on the housing list for the Edzell area. The information suggests that the majority of applicants (58%) require a one-bedroom property, but that there is also demand for two-bed (23%) and three-bed (13%) accommodation. There is nothing in planning policy that prevents demolition of housing that is no longer fit for purpose and replacement with properties that are better aligned to identified need. The applicants letting policy is not relevant to the determination of this application, but a condition is attached to ensure the properties are retained as affordable housing units in the future.

- 8.24 The application is generally in conformity with the council's design policies and associated guidance. The proposal departs from standard housing layouts by reducing private garden ground and incorporating an area of communal private garden, but that is a direct and deliberate design response taking account of the nature of the housing proposed. The overall private garden provision, including the communal area, is broadly in accordance with council design guidance in quantitative terms. Specific reference is made to the distance between a number of windows and blank walls within the development. However, the applicant has provided detailed assessment to demonstrate that the affected widows would receive adequate daylight and sunlight having regard to recognised standards. The overall design is of reasonably high quality and responds well to the site and its setting.
- 8.25 Council policy indicates that transport assessment will generally be required for residential developments of 100 dwellings or more. This proposal would see the number of residential units on the site reduced from 25 to 21 units. The roads service has not identified a requirement for a transport assessment and has indicated it has no concern regarding the capacity of the road network. There is no reasonable basis to require a transport assessment in those circumstances and little basis to consider that the development would give rise to unacceptable impacts on the road network. The national roads development guide, which has been adopted by the council, identifies that car parking provision for affordable housing should be provided at 0.5 spaces per dwelling plus 0.3 spaces visitor parking per dwelling. In this case that equates to a requirement for 17 parking spaces and an additional 3 disabled parking bays. The proposal has been amended to incorporate 20 parking spaces; that complies with the council's approved standards, and the roads service has confirmed it is satisfied with that provision.
- 8.26 Concern regarding the impact of development on amenity of residents in the area is understandable. However, it is not unusual for buildings to be demolished and for new development to take place in proximity of existing residential property. Conditions are proposed to control the development and to minimise amenity impacts during the demolition and construction process.
- 8.27 The planning system cannot reasonably regulate maintenance of private garden areas. However, a condition is proposed that requires approval of a scheme for the management and maintenance of all communal areas (including trees) and unadopted infrastructure within the development.
- 8.28 Issues regarding demolition are discussed above. As demolition of the building is not

contrary to development plan policy; as the existing building is of little architectural, historic, or cultural significance; and given that the existing building can be demolished without any requirement to secure planning permission, objections regarding this are considered to merit little weight. There is no strong planning argument to require the buildings retention; indeed, as noted, the planning system cannot secure that outcome given available permitted development rights.

8.29 In conclusion, the proposal provides for the demolition of an existing building that is in residential use and the erection of a new residential development in its place. The site is within a development boundary and development plan policy is generally supportive of residential development within those boundaries. The general layout and design of the proposed development does not give rise to any significant issues with relevant policy and design guidance and the applicant has provided information to demonstrate that the proposed properties would provide a good living environment. The proposal does not result in any unacceptable impact on amenity, built or natural environment interest, or infrastructure subject to the conditions proposed. The representations submitted by third parties have been considered in the assessment of the application and preparation of this report. Where appropriate matters are addressed by proposed planning conditions. This proposal is compatible with development plan policy and there are no material planning considerations that justify refusal of planning permission.

9. OTHER MATTERS

HUMAN RIGHTS IMPLICATIONS

The recommendation in this report for grant of planning permission, subject to conditions, has potential implications for neighbours in terms of alleged interference with privacy, home or family life (Article 8) and peaceful enjoyment of their possessions (First Protocol, Article 1). For the reasons referred to elsewhere in this report justifying this recommendation in planning terms, it is considered that any actual or apprehended infringement of such Convention Rights, is justified. The conditions constitute a justified and proportional control of the use of the property in accordance with the general interest and have regard to the necessary balance of the applicant's freedom to enjoy his property against the public interest and the freedom of others to enjoy neighbouring property/home life/privacy without undue interference.

10. CONCLUSION

It is recommended that the application be approved for the following reason and subject to the following conditions:

Reason for Approval:

The proposal is in accordance with the development plan as it is compatible with the locational criteria for residential development identified in the plan and as it does not give rise to unacceptable impacts on amenity, natural and built environment, road safety or infrastructure, subject to the stated conditions. There are no material considerations that justify refusal of planning permission contrary to the provisions of the development plan.

Conditions:

1. That the development of residential units hereby approved is to comprise solely of affordable housing, that is to say housing of a reasonable quality that will be affordable to people on modest incomes. The residential units shall be owned,

managed, leased or otherwise provided in perpetuity as such by Angus Council or by a registered social landlord or other body having similar objectives, as approved of in writing by the planning authority.

Reason: In order to ensure that the development is built and occupied as affordable housing as that is the basis upon which the application has been assessed.

- 2. That prior to the commencement of any development hereby approved, including demolition, the following shall be submitted to and approved in writing by the planning authority: -
 - a demolition and construction management plan, including a site waste management plan. That plan shall include, but no be limited to, precise details of the method of demolition, salvage of demolition waste, storage of materials, and measures for the remediation of the site in advance of commencement of construction activity. It shall also make provision for adherence with the recommendations and mitigation measures identified in the RPS Phase 2 Ground Investigation Addendum Interpretative Report (JFR9268) dated April 2020 submitted in support of this application. Thereafter the development shall be undertaken only in accordance with the approved plan.
 - b) precise details of the proposed hard and soft landscaping. The details shall include a hard and soft landscaping scheme for all communal areas within the development, including boundary treatments and bin storage for each unit. The soft landscaping scheme shall include written specifications (including cultivation and other operations associated with plant establishment); schedules of plants noting species, plant sizes and proposed numbers/densities where appropriate and an implementation programme. It shall also provide details of compensatory and replacement planting for those trees within the site that are to be felled. Thereafter the landscaping of any communal areas shall be implemented prior to the occupation of the first residential unit. Any plants or trees which within a period of five years from the end of the planting season in which they are planted die; are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species.
 - c) a scheme for the management and maintenance of all open spaces, outdoor communal areas and landscaping, including hedges where they form a boundary with public areas, and unadopted infrastructure. That scheme shall provide for the maintenance of those areas in perpetuity and the approved scheme shall be implemented upon occupation of the first residential unit.
 - d) details of cycle storage within the development. That scheme shall provide evidence of secure storage for a minimum of 24 cycles either within curtilage of properties, in a communal facility, or through a combination of both. The cycle storage shall be installed in accordance with the approved details prior to the occupation of the first residential unit.
 - e) details of existing and proposed ground levels and finished floor levels

relative to a fixed datum. Thereafter the ground and floor levels shall be formed or altered only in accordance with the approved details.

- f) precise details of a scheme to mitigate the impact of the development on bats and nesting birds and to enhance the biodiversity of the area. That scheme shall provide timescales for the provision of that mitigation and shall as a minimum include the measures outlined in the Direct Ecology Bat Survey Report dated 17.08.2020 (Version 1.0) submitted in support of this application. The approved scheme shall be implemented in accordance with the approved details and the mitigation measures shall be retained thereafter.
- g) Details of surface water disposal arrangements. The submitted information shall include details of appropriate levels of treatment, run-off rates and maintenance arrangements in perpetuity. Thereafter the approved surface water disposal arrangements shall be implemented in accordance with the approved phasing plan.

Reason: In order that the planning authority may verify the acceptability of the required details and to ensure that the development is undertaken in accordance with those details in the interests of amenity, sustainable use of materials, to ensure that the land is suitable for the proposed use, to ensure provision and maintenance of appropriate landscaping and cycle parking, to mitigate the impact of development on protected species and to promote biodiversity, and to ensure provision and appropriate maintenance of a surface water drainage system.

3. Prior to the commencement of any development, including demolition, a 1.8m high temporary protection fence shall be erected in accordance with BS5837:2012 around those trees that are to be retained. That fencing shall remain in situ for the duration of development and no materials, supplies, plant, machinery, soil heaps, changes in ground levels, or demolition/construction activities shall be permitted within the identified tree protection areas.

Reason: In order to avoid unnecessary damage to trees that add to the character and amenity of the area.

4. Noise associated with the demolition of existing buildings and construction of the development, including the movement of materials, plant and equipment shall not exceed the noise limits shown in table A below for the times shown. At all other times noise associated with demolition and construction operations shall be inaudible at any sensitive receptor. For the avoidance of doubt sensitive receptors includes all residential properties, hospitals, schools and office buildings.

Table A: Construction Noise Limits Day Time Average Period Noise Limit

Day	Time	Noise Limit
Monday – Friday	0700 – 0800	60 dBA Leq (1hr)
Monday – Friday	0800 – 1800	70 dBA Leq (10hrs)
Monday – Friday	1800 – 1900	60 dBA Leq (1hr)
Saturday	0800 – 1300	70 dBA Leq (5hrs)

Reason: In the interest of the residential amenity of nearby noise sensitive properties.

- 5. Vibration levels associated with the demolition of the building and construction of the development shall not exceed the following limits: -
 - (a) 1mms-1 PPV at existing residential or educational properties.
 - (b) 3mms-1 PPV at existing commercial or industrial properties.

The above vibration limits relate to maximum PPV ground borne vibration occurring in any one of three mutually perpendicular axes. Vibration is to be measured on the foundation or on an external façade no more than 1m above ground level or on solid ground as near the façade as possible.

Reason: In the interest of the residential amenity of nearby sensitive properties.

6. That notwithstanding the provisions of any development order, no windows, doors, or other openings shall be formed above ground floor level in the south facing elevations of the properties identified as plots 7 – 10, unless otherwise approved through the grant of planning permission following the submission of an application to the planning authority.

Reason: In order that the planning authority may consider the acceptability of any additional windows or other openings on the amenity of occupants of nearby property having regard to relevant policy and guidance.

NOTE: No background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973, (other than any containing confidential or exempt information) were relied on to any material extent in preparing the above Report.

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DATE: 10 MAY 2021

APPENDIX 1: LOCATION PLAN APPENDIX 2: SUMMARY OF APPLICANTS SUPPORTING INFORMATION APPENDIX 3: LETTERS OF REPRESENTATION APPENDIX 4: RELEVANT DEVELOPMENT PLAN POLICIES APPENDIX 5: PLANNING SERVICE PRESENTATION