

Name of Applicant	Proposal	Expiry Date	Plan Ref.
Stoford Gorcott Limited	<p>Application for approval of reserved matters relating to appearance, landscaping, layout, scale and access (internal to the site) for a use class B8 (storage and distribution) building with ancillary floorspace including use class B1 (offices); earthworks; plot and structural landscape works inclusive of an ecological enhancement area; internal access roads, car parking, gatehouse; utilities and plant infrastructure; on the northern development parcel pursuant to S73 permissions SDC 18/03746/VARY, BDC 18/01596/S73, RBC 18/01626/S73 following outline permissions SDC 17/01847/OUT , BDC 17/00701/OUT, RBC 17/00700/OUT</p> <p>Redditch Gateway Land Adjacent To The A4023, Coventry Highway, Redditch, Worcestershire,</p>	03.10.2019	19/00619/REM

RECOMMENDATION:

- a) Minded to **APPROVE** the reserved matters
- b) That **DELEGATED POWERS** be granted to the Head of Planning and Regeneration to agree the final scope and detailed wording and numbering of conditions.

Applicant's Supporting Documents

List of documents:

- Covering letter
- EIA Statement of Compliance
- Transport Technical Note 1
- Design and Access Statement
- Flood Risk Assessment
- Flood Risk Management Summary Note
- Sustainable Drainage Statement
- Geotechnical Assessment Report
- Factual Ground Investigation Report
- Veteran Tree Strategy
- External Lighting Strategy Report
- Written Scheme of Investigation
- Computer Generated Images (x3)
- Images of associated site infrastructure (e.g. bin store and generators)

1.0 **REPRESENTATIONS**

Parish Councils

1.1 **Beoley Parish Council**

We at Beoley Parish Council strongly object to this application for the following reasons and concerns:

- extensive light emissions. The lighting proposals, seem to have a light mitigation scheme in place to minimise the impact of lighting (a list of the type of downward lights to be used is just not enough), but previous applications on Ravensbank had similar 'assurances' that were ignored.
- the application appears to now be for one enormous building, rather than a series of smaller units. Why allow such large 'eye-sores'?
- noise pollution will cause huge stress to local residents.
- the application ignores Stratford DC's recent policy to be '.....carbon neutral by 2030'.
- how can all this application be agreed before the nature of the sites use and tenants have been decided. (Numbers of vehicles on and off the site for example)
- there is no assessment of the affect on ecology or any noise or light pollution report . Is this is an attempt to get detail agreed before the overall strategy and need for this site has been agreed by Bromsgrove, Redditch and Stratford DCs?

1.2 **Mappleborough Green**

Object to the application for the following planning reasons:

- Applications should have been submitted to all three authorities (Stratford-on-Avon, Bromsgrove and Redditch)
- No agreement to the amendments to the original outline consent proposed in March 2019
- Concern regarding the problems that will accompany a building and associated business of this size, particularly light and air quality pollution, and increased living stress to local residents which will impact on their health and wellbeing
- Contrary to Stratford-on-Avon's decision to be carbon neutral by 2030
- Good decisions regarding drainage, landscaping and business impact cannot be made until the nature and operation of the business is fully understood – question why transparency is such a problem to the potential business operator (28.08.2019)

Officer clarified in an email to Mappleborough Green Parish Council that the application site for the reserved matters does not include land within Redditch Borough Council and that it is therefore correct for reserved matters submissions to be made to Stratford-on-Avon District Council and Bromsgrove District Council only (bullet 1).

Officer also clarified that planning permission had been granted to amend the parameters approved under the original hybrid application – 18/03746/VARY – following a resolution to grant from Planning Committee (bullet 2).

Mappleborough Green PC acknowledged receipt of the email (28.08.2019)

1.3 Coughton Parish Council

Object to the application for the following planning reasons:

- Scale of development has increased considerably from the first outline application
- Proposal accommodates a fivefold increase in the number of HGV spaces, with no indication of vehicle turnround times which are essential factors in predicting traffic flows
- No evidence to support the proposed occupier's statement that the majority of HGV traffic would route to and from the M42 junction 3, with insignificant HGVs travelling south
- Correct for HGV routing strategy to prevent vehicles travelling through Mappleborough Green and Studley, but no consideration has been given to the small villages of Coughton and Kings Coughton
- Increased traffic which will increase noise and disruption on the local highway network, poorer air quality for residents, visitors and school children
- Future occupier should be known at this stage to enable an informed decision to be made (02.09.2019)

1.4 The following nearby Parish Councils were also consulted. No representations were received

Studley Parish Council
Tanworth in Arden Parish Council
Sperrall Parish Council
Morton Bagot Parish Council
Ullenhall Parish Council
Beaudesert Parish Council
Henley in Arden Parish Council
Oldberrow Parish Meeting
Sambourne Parish Council

CONSULTATIONS

The full responses are available in the application file.

Highways and Transportation Consultations

1.5 Warwickshire County Council Highways No objection (11.09.2019)

1.6 Worcestershire County Council Highways

No objection subject to the following conditions:

- Access, parking and turning areas provided prior to first use
- EVCPs installed prior to first use in accordance with the contents of the amended Transport Technical Note
- Details of sheltered and secure cycle parking to be submitted and approved
- Details of showers and lockers to be installed in the building to be submitted and approved (13.09.2019)

1.7 Warwickshire County Council Rights of Way Make the following comments:

- Currently there are no public rights of way which cross the site
- However, there is a public right of way that currently runs adjacent to the County boundary which the applicant proposes to legally divert onto new alignment, part of which would fall within Warwickshire
- No objection to the principle of this diversion subject to assurances that the diversion route would be well drained and that any surfacing be agreed
- Condition should be attached to ensure at least 2m between the edge of the public right of way/associated planting and diverted brook
- Require assurances that the diverted public right of way would not be liable to flooding
- Stile is shown on Landscape Masterplan – a gap or gate should instead be provided
- Recommend notes relating to obligations toward the public right of way (02.09.2019)

1.8 Worcestershire County Council Rights of Way Make the following comments:

- Development appears to affect Beoley parish footpaths BE-585 and BE- 588
- Proposal requires diversion of the public right of way – permission for diversion of the route required before any development affecting the public right of way is commenced
- Recommend notes relating to obligations toward the public right of way (30.01.2019)

1.9 Ramblers Association

No representation – there are no public rights of way affected by this application on the Stratford-on-Avon District side of the cross-boundary development (31.07.2019)

Heritage Consultations

1.10 Bromsgrove District Council and Redditch Borough Council Conservation

Make the following comments:

- Note that the proposed land levels will reduce any potential views from Gorcott Hall
- Question how light spill will be reduced, bearing in mind the height of the columns
- Clarification required on coloured contour lines
- Note the submission of a plan to show light spill – question whether this would be noticeably increased during the winter months when trees are not in leaf
- Plan should include replanting of trees/shrubs which fail in first five years
- Question how landscape would be managed in the long term (29.08.2019)

1.11 Historic England

Do not wish to offer comments – recommend that views are sought from specialise conservation and archaeological advisors where relevant (07.08.2019)

1.12 Worcestershire County Council Archive and Archaeology

Make the following comments:

- The reserved matters does not change the impact on archaeological deposits
- Note the intention to make the line of the former historic boundary which, along with the intention to provide suitable public interpretation of the boundary and the history of the area as part of the green infrastructure plan, is welcomed
- Some aspects of archaeological related conditions on the hybrid consent are yet to be discharged (15.08.2019)

Ecology Consultations

1.13 Worcestershire County Council Ecology

Make the following comments:

- Overall the biodiversity enhancement measures are acceptable and concerns raised on previous plans have been addressed
- Pleased to see retention of tree T18
- Do not consider there to be satisfactory reasoning for the loss of veteran trees considered through the previous application
- Use of concrete to anchor the relocated veteran tree is not ideal and a more sustainable alternative should be sought if possible
- Mammal ledges should be installed to culverts (04.09.2019)

1.14 Worcestershire Wildlife Trust

Make the following comments:

- Reiterate in-principle objection to the loss of veteran trees
- The Veteran Tree Strategy which has been submitted sets out an appropriate approach to mitigation for the lost trees. The Strategy will need to be refined on a tree by tree basis and so further consideration and discussion with consultees may be helpful
- Concerned with the rather narrow corridor that the diverted brook will run where along the southern edge of the northern parcel
- Whilst generally against culverting, agree that the protection of tree T18 is important and so some consideration of culverting may be valid
- Sensitive management of watercourse and nearby SUDS will be critical
- Long-term management of green infrastructure should be secured through a Landscape and Ecological Management Plan and associated S106 agreement
- Understand biodiversity offsetting is secured and managed by Warwickshire County Council Ecology
- Pleased to see the fixed site lighting limited by design so as to keep light penetration into surrounding habitats below 2lux
- There will still be significant light spill into surrounding habitat in some places – further mitigation of light spill may be required (27.08.2019)

1.15 Natural England

No objection (23.08.2019)

1.16 BDC and RBC Tree Officer Make the following comments:

- Access road into development causes incursion into root protection area (RPA) of tree T18
- No dig construction should be used for section of road and curbing that incurs into the RPA
- Proposed pipe line to be installed through the RPA of tree T18 would cause extensive root damage
- Hydrology of the ground local to the tree would change as a result of the proposal – potential to cause longer term root decay damage to this tree
- No objection to loss of sections of G12, G20 and the total loss of G23 and G24 – they are of small stature and low prominence
- Object to the loss of tree and hedge line along Blacksoils Brook
- Level changes within RPAs of trees T11 and T13 are proposed – may cause root damage or alter the hydrology of the ground local to the tree
- Measures for relocation of trees T46 and T74 as proposed through the Veteran Tree Strategy are appropriate, but trees T73 and T92 should be retained
- Request minor amendments to landscape plans proposed
- Generally the landscape scheme contains a suitable mix of shrubs, hedging and trees
- Pleasing to see the inclusion of an orchard area and areas to be meadow managed
- Conditions recommended to include no works to trees without consent, tree protection plan, no works within RPAs, submission and approval of an orchard and meadow management (21.08.2019)

1.17 Woodland Trust

Make the following comments:

- Acknowledge that the relocation of veteran trees has been approved, but objection to the principle of this remains
- The Trust does not have any further comments to make (09.09.2019)

Drainage and Flood Risk Consultations

1.18 Environment Agency

No objection (16.09.2019)

1.19 Warwickshire County Council Flood Risk Management (LLFA)

No objection subject to condition:

- Independent review of hydrological model in respect of diverted Blacksoils Brook (10.09.2019)

1.20 North Worcestershire Water Management NWWM (LLFA)

No objection but makes the following comments:

- Reservations remain regarding the inclusion of new culverts, but understand that they are necessary due to level changes, ensuring the retention of mature trees and constraints of the adjacent Gorcott Hall – these factors restrict the available options for a route of an open channel option and the proposed culverts can be permitted in their current form
- Proposed sections for the diverted Blacksoils Brook are largely acceptable
- Two of the proposed car parking areas are proposed in permeable paving which is welcomed
- Revised sustainable drainage proposals are acceptable (12.09.2019)

1.21 Severn Trent Water

No objection but recommend attachment of a note (16.09.2019)

Environmental Health Consultations

1.22 SDC Environmental Health No comments (22.08.2019)

1.23 SDC Waste and Recycling No comment (26.07.2019)

1.24 Worcestershire Regulatory Services – Technical Services Lighting

No objection in terms of light nuisance:

- Submitted external lighting scheme appears satisfactory and complies with the Institute of Lighting Engineers Guidance on obtrusive lighting (16.08.2019)

Air quality

Make the following comments:

- Air Quality Assessment should be undertaken
- Cycle parking should be incorporated
- 10% of allocated car parking spaces should be installed with electric vehicle charging points
- Low emission boilers should be used (16.08.2019)

Contamination

Make the following comments:

- Full copy of the Factual Ground Investigation report should be submitted to enable recommendation of suitable conditions (19.08.2019)

Officer note: The report was submitted to Worcestershire Regulatory Services on 22.08.2019. No further response received.

Other Consultees

1.25 Redditch Borough Council (adjoining authority)

Consultation considered by RBC's Planning Committee on the 14.08.19 with the minutes of this meeting provided as its consultation response:

- Clarification required on location of lorry loading bays and parking
- Question whether grey is the most appropriate colour
- Requirement to provide adequate ecological and wildlife mitigation
- Clarification required on arrangements for parking and lighting
- Clarification on tree mix (04.09.2019)

Further comments received, following consideration of proposal at subsequent RBC Planning Committee on the 18.09.2019:

No objection (19.09.2019)

1.26 Worcestershire County Council Landscape

Make the following comments:

- Satisfied that the landscape mitigation and enhancement measures and methods accords with conditions attached to the hybrid planning permission (05.09.2019)

1.27 Warwickshire Police

No observations (29.07.2019)

1.28 Worcestershire County Council Sustainability Makes the following comments:

- Energy performance that goes beyond what is required under Building Regulations should be considered
- Electric vehicle charging points with a minimum capacity of 7kWh should be provided
- Water management and conservation in line with BREEAM should be achieved
- Separation and removal of food waste from the site should be considered (04.09.2019)

1.29 BDC/RBC Climate Change and Energy Support Officer

Makes the following comments:

- This key 'game-changer' site should exceed the requirements of the Bromsgrove Local Plan in respect of climate change and sustainable development
- Any warehouse facility that facilitates the distribution of goods has an associated carbon footprint, and there is a need to reduce consumption and re-use goods in order to tackle climate change
- Applicant should be required to demonstrate that it is using the most sustainable construction methods and materials, with clear justification including evidence of any less sustainable choices
- The final energy efficiency and sustainability implementation plan should be submitted for approval. The applicant should be required to demonstrate that they are using the highest standards of energy efficiency or sustainability measures, with clear justification including evidence of any lesser choices
- Full coverage of the roof with solar photovoltaics – any less than this needs clear justification
- There should be a requirement for low carbon heating, unless clear justification is provided
- Hybrid battery storage/diesel generator back-up should be required unless clear justification is provided

Light spill could be reduced by reducing the height of light columns (10.09.2019)

Third Party Responses

1.30 The planning-related comments made by third parties have been summarised by the case officer.

1.31 14 letters of objection from local residents received, including from the Winyates Green Residents Association and Warwickshire County Councillor (Studley) Rickhards. Planning grounds for objection:

- Local road infrastructure insufficient to support development
- Increased traffic through nearby villages unacceptable
- Increased traffic would impact on highway safety
- Higher air pollution from increased traffic
- Higher noise pollution from increased traffic
- HGV Routing Strategy (approved through DISCN/00123/19) will encourage HGV traffic from other industrial estates to Redditch to route through Studley to avoid increased traffic routing north
- Insufficient public transport will mean workers drive to the site – no mention or plan for additional cars to the site
- Traffic impact should be considered cumulatively with other developments in Redditch
- Contrary to Stratford-on-Avon's decision to be carbon neutral by 2030
- Increased light pollution
- Visual harm due to the scale of the building proposed
- Building would adversely dominate the landscape
- Difficult to mask/screen the building due to colour
- Loss of natural habitat
- Loss of biodiversity/wildlife
- Loss of Green Belt
- Larger development than originally proposed
- Empty units should be occupied first
- Applications should have been made to all three authorities – Stratford- on-Avon District Council, Bromsgrove District Council and Redditch Borough Council
- No agreement to the amendments to the original outline consent proposed in March 2019
- Good decisions regarding drainage, landscaping and business impact cannot be made until the nature and operation of the business is fully understood
- Acoustic barriers and soft landscaping should be used to minimise impact on residential properties
- Type of development would not give rise to high quality jobs envisaged for the site

1 letter of no representation from a local resident also received.

2.0 DEVELOPMENT PLAN AND MATERIAL CONSIDERATIONS

Development Plan

- Bromsgrove District Plan 2011-2030
- BDP1 Sustainable Development Principles
- BDP5B Other Development Sites
- BDP6 Infrastructure Contributions
- BDP13 New Employment Development
- BDP14 Designated Employment
- BDP16 Sustainable Transport
- BDP19 High Quality Design
- BDP20 Managing the Historic Environment
- BDP21 Natural Environment
- BDP22 Climate Change
- BDP23 Water Management
- BDP24 Green Infrastructure
- BDP25 Health and Well Being

Other Material Considerations

Central Government guidance

- NPPF and PPG
- Circular 06/05: Biodiversity and Geological Conservation

Other Planning Documents and Guidance

- Bromsgrove District Council High Quality Design SPD
- Stratford-on-Avon District Core Strategy 2011-2031
- Development Requirements SPD
- Stratford on Avon District Design Guide (information guidance)
- Historic England Good Practice Notes 2015:
 - GPA 1 – The Historic Environment in Local Plans
 - GPA 2 – Managing Significance in Decision-Taking in the Historic Environment
 - GPA 3 – The Setting of Heritage Assets

3.0 RELEVANT PLANNING HISTORY

<u>Reference Number</u>	<u>Proposal</u>	<u>Decision and date</u>
SDC 18/03746/VARY RBC 18/01626/S73 BDC 18/01596/S73	Variation of conditions 2 and 8 to amend the parameters of development for the northern development parcel, and Phase 1 Ground Engineering works (and changes to conditions 12, 16, 18, 21, 29, 31, 32, 36 and 37 to allow hedgerow and tree removal prior to the coming into effect of the relevant condition, and conditions 28 and 29 to relate to updated flood risk assessment) in respect of hybrid planning permissions 17/01847/OUT (Stratford reference number), 17/00700/OUT (Redditch reference number), and 17/00701/OUT (Bromsgrove reference number) dated 11 June 2018.	All Granted 10.04.2019
SDC 17/01847/OUT RBC 17/00700/OUT BDC 17/00701/BDC	Hybrid application comprising: Outline planning application (with matters of appearance, landscaping, layout, scale and details of internal circulation routes reserved) for the development on a phased basis of 32ha of employment land for business/industrial uses (Use Classes B1, B2, B8). The development shall include: landscaping, parking, associated infrastructure, utilities, drainage (including SUDS) and ground engineering works; And Full planning application for Phase 1 Ground Engineering works, and details of means of access to the site from the A4023	All Granted 11 June 2018
DISCN/00123/19	Discharge of Condition 19 HGV Routing Strategy and 20 HGV Surveys of planning permission 18/03746/VARY.	Condition 19 approved, and condition 20 part-approved SDC 30.07.2019 BDC 14.08.2019 RDC 14.08.2019

4.0 BACKGROUND AND DESCRIPTION OF PROPOSAL

4.1 This application for reserved matters is pursuant to hybrid planning application 18/01596/S73 which granted:

- Outline planning permission, with matters of appearance, landscaping, layout, scale and details of internal circulation routes reserved, for the development on a phased basis of 32 hectares of employment land for business/industrial uses (use classes B1, B2 and B8); and
- Full planning permission for Phase 1 Ground Engineering works (to create the first development plateau) and means of access to the site from the A4023

- 4.2 As the entirety of the Redditch Gateway site crosses the administrative boundaries of Stratford-on-Avon District Council, Redditch Borough Council and Bromsgrove District Council, all three LPAs granted identical planning applications (RBC application reference 18/01626/S73, SDC application reference 18/03746/VARY on the 10 April 2019. This was following each application having been given a resolution to grant from each respective Planning Committee.
- 4.3 This reserved matters application relates to the northern development parcel of the wider Redditch Gateway site. As the site falls within the jurisdictions of Stratford-on-Avon District Council and Bromsgrove District Council, identical reserved matters applications have been submitted to each LPA (SDC application reference 19/01545/REM). Redditch Borough Council was consulted on both applications as a neighbouring authority given the proximity of the application site to land within its jurisdiction. However, as the red line for the application does not fall in Redditch, it is correct that a reserved matters application has not been submitted to Redditch Borough Council.
- 4.4 The application seeks reserved matters approval for appearance, landscaping, layout, scale and internal routes/accesses.
- 4.5 The reserved matters submission proposes the following (which all fall within the parameters of the hybrid consent 18/01596/S73):
- a use class B8 (storage and distribution) building with 843sqm of ancillary use class B1 (offices) floorspace; the building would have a footprint of 34,041 sqm (Gross External Area), and maximum height of 16.2m; the building would be constructed of a flat composite panel system;
 - service yard which includes 106 HGV loading bays and 125 HGV parking bays;
 - 469 car parking spaces (including 24 accessible spaces), 60 cycle spaces and 24 motorcycle spaces;
 - installation of electric vehicle charging points to 48 car parking spaces (10%);
 - two gatehouses and associated infrastructure including cycle shelters, bus shelters and smoking shelters;
 - conservation landscape buffer zone to the eastern boundary of the site (which includes the route for the re-diverted Blacksoils Brook);
 - planting of 10 no. black poplar trees and stud markings to denote historic County boundary

5.0 ASSESSMENT OF THE KEY ISSUES

5.1 Principle of Development

- 5.1.1 The Council is required to make a decision in line with the Development Plan, unless material considerations indicate otherwise. (Section 38(6) PCPA 2004 and Section 70(2) TCPA 1990). The National Planning Policy Framework (NPPF) is a key material planning consideration.

- 5.1.2 I note that a number of parish council/third party representations have been received which raise objection to the scheme on the basis of matters relating to the principle of development. The principle of development has already been established through the grant of 18/01596/S73. The means of access into the site from the public highway via a signalised junction on the Coventry Highway has also been committed through this planning permission.
- 5.1.3 Representations have also been received which state that the size of the development has increased from that which was proposed and granted under the previous applications (17/00701/OUT and 18/01596/S73).
- 5.1.4 This reserved matters submission is made pursuant to the later hybrid planning permission – 18/01596/S73. In respect of the northern development parcel (the area of the site to the north of the A4023 Coventry Highway), the Parameters Plan (drawing no. 5372-205 T) granted the following:
- Yellow Employment Zone which crosses the Blacksoils Brook (requiring its diversion) – area to include parking and servicing, maximum building height not to exceed Above Ordnance Datum (AOD) **123.0m**, maximum plant height not to exceed AOD **125.0m**
 - Three grey Employment Zones Infrastructure – area to include car parking for employees and visitors, lorry parking, potential bus stops, internal roads and footpaths, green corridor
 - Grey Employment Zone Infrastructure – area to include car parking for employees and visitors, lorry parking, potential bus stops, internal roads and footpaths, and the possibility for a decked car park, maximum building height not to exceed AOD 117.5m
 - Green Landscaping Buffer Zone – area to the eastern part of the site which would provide for the rerouted Blacksoils Brook and footpath.
- 5.1.5 The proposed building is located in the Yellow Employment Zone. It would have a maximum height AOD of **119.8m** (no external plant is proposed), therefore complying with the hybrid planning permission parameters. This translates to the building having a maximum height of **16.2m** when measured from the proposed ground level to the top of the parapet roof. The only other buildings proposed through this reserved matters are two small gatehouses; one beyond the southwest elevation of the building, and one beyond the southeast elevation of the building.
- 5.1.6 The gatehouse beyond the southwest elevation is located within the Yellow Employment Zone and complies with the parameters having an AOD height of 107.5m, which translates to a height of 3.7m.
- 5.1.7 The gatehouse beyond the southeast elevation is located within the Grey Employment Zone Infrastructure. The approved Parameters Plan allowed a maximum building height not to exceed AOD of 117.5m. The proposed gatehouse would have a AOD height of 109.400 which translates to a height of 3.7m.

- 5.1.8 Condition 8 of 18/01596/S73 states: “The total development of all phases shall not exceed 90,000sqm (Gross Internal Area – GIA) of floorspace within use classes B1, B2, B8 of which no less than 10% of the floorspace, including ancillary space within B2 and B8 units, shall be offices (use class B1(a))”.
- 5.1.9 The main building proposed through this reserved matters application has a floor area of 33,526sqm Gross Internal Area (34,041 sqm Gross External Area). With the addition of the two gatehouses this increases to 33,581.92 sqm GIA. This reserved matters therefore comprises 37% of the total permitted floorspace across the entirety of the Redditch Gateway development. The proposal therefore complies with the requirements of this condition, and does not constitute development of the site over and above what was assessed and permitted under 18/01596/S73.
- 5.1.10 The application relates to the reserved matters, specifically appearance, landscaping, layout, scale and internal routes/accesses for the northern development parcel pursuant to 18/01596/S73.

5.2 **Appearance**

- 5.2.1 Policy BDP1 criterion ‘f’ states that regard will be had to “*The impact on visual amenity*”
- 5.2.3 Paragraph 6.2.2 of the BDC High Quality Design SPD states that “*Planning permission will only be granted for new commercial and industrial buildings which are of high quality design and are appropriate for their use and context. Development will not be permitted where it is considered to have a detrimental impact on the townscape or landscape character.*”
- 5.2.4 Paragraph 6.2.10 of the BDC High Quality Design SPD states that “*Commercial developments should be constructed to produce a visually attractive scheme. Materials, building methods and details in the design should aim to enhance the local distinctiveness of an area. Where there is no precedent set for specific types of materials to be used, a high quality area with a distinct character should be created, either from traditional or more modern materials. It is the degree to which any material is appropriate to its surroundings and its function that should determine its use*”
- 5.2.5 The built form proposed under this reserved matters application comprises the main building, two gatehouses and associated structures which include a bin store, bus stop shelters and cycle shelters.
- 5.2.6 The main building takes a form typical of a contemporary building being occupied for a B8 storage and distribution use. On three of its four sides it has continuous rows of HGV docking bays, with the remaining side featuring a lower level projection containing the office/welfare area (welfare areas to include nurses room, prayer room, showers and toilets, canteen/breakout room, mothers room, lockers and utility store). External access stairwells are located on both the northeast and southwest elevations of the building.

- 5.2.7 The building would be finished in a flat composite panel system. The colour palette has been kept simple. The Design and Access Statement advises that prior to submission of the application a darker grey palette was considered. However, prior to formal submission, the colour scheme was amended such that a lighter grey would be used to finish the majority of the building. Darker grey cladding is proposed to lower level projections to add visual interest. A blue feature strip is proposed along the top of the building. All doors, window and shutters would have a dark grey finish.
- 5.2.8 In my view, the use of light grey, with dark grey feature areas is appropriate. Ravensbank Drive Industrial Estate is located to the west of the site. The buildings closest to the application site are typically light grey, with dark grey cladding used for smaller elements on the building. In my view the colour scheme proposed would reflect the finish of neighbouring buildings in similar uses. When looking up toward the building, the light grey cladding would, in my view, help the building to blend in with the sky. Whilst higher level views, available from the A435 for example, may be available for a time, the light grey roof is considered to be sympathetic to the other industrial development in the area.
- 5.2.9 Given the proximity of the application site to the boundary with Redditch Borough Council, it considered the proposals as an adjoining consultee. The proposals were presented to Redditch Borough Council's Planning Committee and the minutes of this meeting confirm that members were concerned with the use of grey in the finish of the building. No specific reasons were minuted, but members required any colour scheme to minimise its impact and help the structure to blend in with its surroundings.
- 5.2.10 As per my assessment above, I consider that the grey colour scheme, particularly with the dark accents, would minimise its impact and assist with blending the building into the surroundings. I acknowledge that regardless of the colour scheme proposed, a building of this scale will inevitably impact on the visual amenity of the area, but I do not consider this impact to be unacceptable.
- 5.2.11 Condition 15 of 18/01596/S73 requires the submission and approval of material samples prior to commencement of each phase of development. This would ensure that the exact colour and finish of the materials proposed is acceptable. However, I am content that the principle of a lighter and darker grey would represent an appropriate palette and I would expect any material samples to reflect the colours shown on the plans submitted. The importance of a matte finish to the roof is highlighted to minimise reflection of light in any available higher levels views from the A435 and Gorcott Hall.
- 5.2.12 Condition 39 of 18/01596/S73 requires the submission and approval of lighting details for each phase. As this impacts on the appearance of the development, lighting details have also been provided under this reserved matters submission.
- 5.2.13 An External Lighting Strategy Report has been submitted, along with plans to show the locations for lighting to be installed within the northern development parcel. Both column mounted lights (on columns ranging in height from 6m to 12m) and building mounting lights are proposed.

5.2.14 The External Lighting Strategy Report confirms that external lighting has been designed to prevent upward light pollution and spill light to neighbouring areas, with due regard to the key sensitive conservation/ecology areas. In assessing the appropriateness of the lighting scheme proposed, I have had regard to its impact on neighbouring amenity (in terms of disturbance to dwellings and garden areas from external lighting), impact on the visual amenity of the area, and impact on ecology (in terms of light spill into the woodland which could adversely impact on light sensitive species).

5.2.15 I consider that the lighting scheme proposed is sympathetic to residential properties, ecology and the visual amenity of the area. I am therefore satisfied that this element of the proposal is acceptable.

5.2.16 In light of the assessment above, I am satisfied that the appearance as proposed through this reserved matters submission is acceptable, and accords with Policies BDP1CS.5 and CS.9 of the Core Strategy.

5.3 **Landscaping**

5.3.1 Policy BDP21 states that the Council will seek to achieve better management of Bromsgrove's natural environment by expecting developments to: g) Protect and enhance the distinctive landscape character of Bromsgrove, as identified in the Worcestershire Landscape Character Assessment, and take account of the Worcestershire Landscape Character Assessment Supplementary Guidance;

5.3.2 Policy BDP 19 criterion 'p' seeks to Ensure "*all trees that are appropriate (e.g. in terms of size, species, conditions and predicted climate) are retained and integrated within new development*"; and 'q' "*Ensuring development incorporates sufficient, appropriate soft landscaping and measures to reduce the potential impact of pollution (air, noise, vibration, light, water) to occupants, wildlife and the environment*"

5.2.3 Section 6.2 of Bromsgrove District Council's High Quality design SPD provides guidance on the achievement of good landscaping across developments.

5.2.4 The landscape impact of the development of the Redditch Gateway site as a whole was fully considered in the assessment of the hybrid application 18/01596/S73. This reserved matters submission relates to the specific hard and soft landscape details proposed, to include boundary treatments, soft planting and earthworks.

5.2.5 As described within the Design and Access Statement, the primary ecological features within the application site currently centre around Blacksoils Brook. However, the hybrid planning permission 18/01596/S73 granted the diversion of the Blacksoils Brook, together with the hedgerows and trees along it. Whilst landscape harm was identified in the assessment of this previous application, in the planning balance, this was considered to be acceptable.

- 5.2.6 The reserved matters is consistent with the S73 planning permission in that the Blacksoils Brook is diverted around the eastern and southern boundaries of the site, and the hedgerows and trees along the brook are shown for removal. However, the reserved matters application retains a large undeveloped green area to the eastern side of the site, which the Design and Access Statement states comprises an ecological enhancement area. Hedgerows and trees have been retained where possible, including two hedgerows which currently denote field boundaries, as well as mature trees T11 (oak), T13 (oak), T18 (oak), and T86 (oak). The site access road incurs into the root protection area (RPA) of T18 but subject to a condition requiring no dig construction where hardstanding/curbing is located in the RPA, I consider this to be, on balance, acceptable. Level changes are proposed within the RPAs of trees T11 and T13, but these are required to provide the parking areas required to serve the development and have been kept to a minimum to minimise any resultant impact on these trees.
- 5.2.7 The locations for the four veteran trees approved for relocation through 18/01596/S73, have been detailed on the soft landscape plans. They would be located between the new brook and car parking area.
- 5.2.8 A significant amount of new planting is proposed across the site, particularly within this eastern area which will act as a conservation landscape buffer area and ecological enhancement area.
- 5.2.9 An evergreen rich woodland mix is proposed along the northern boundary of the site where it adjoins the woodland. A total of 3,235 trees are proposed, with species including field maple, common hazel, common hawthorn, holly, scotspine, evergreen oak, rowan and conifer. It has been specifically designed as an evergreen rich mix containing a high percentage of native evergreen species to provide habitat value and increased all year round screening to prevent light spill into the woodland. In addition to this, a native hedgerow is proposed between the new woodland planting and security fence to the back edge of the service yard. An ecology fence would be located adjacent to the woodland to assist in screening whilst the planting establishes (located outside the application site but within the control of the applicant).
- 5.2.10 Smaller areas of evergreen rich woodland is also proposed along the site frontage with Coventry Highway, along with marshy grassland and a riparian seed mix around the drainage basins. An area of native shrub planting is also proposed in this location.
- 5.2.11 In addition to the evergreen rich woodland mix, native woodland planting is proposed along the western boundary, between the service yard/HGV parking and conservation landscape buffer, and around the parking areas to the east of the main building.
- 5.2.12 The conservation landscape buffer comprises meadow planting around retained hedgerows and trees, the new pond and diverted brook. A riparian seed mix is proposed to the brook corridor.

- 5.2.13 10 black poplar trees are proposed along the current alignment of the Blacksoils Brook to assist in the interpretation of this historic County boundary. This tree planting would be supported by the provision of metal stud markers to continue to mark the historic County boundary where new hardsurfacing is proposed, and a signpost marker adjacent to the public right of way.
- 5.2.14 A large area of the site toward to southeastern corner is to comprise orchard planting of approximately 90 trees. This is in addition to a smaller area of orchard planting, to provide 23 trees, to the northwestern tip of the site. Orchard planting would comprise local varieties of plums, pears and apples.
- 5.2.15 In my view the landscape scheme which has come forward through this reserved matters submission is of high quality and would provide high visual and ecological value. I consider that the scheme responds positively to the challenges presented through diverting the brook and would facilitate the creation of an attractive soft landscaped area around the building.
- 5.2.16 A range of boundary treatments are proposed across the site, being largely functional to suit the needs of the future occupier.
- 5.2.17 A 3m high acoustic fence is proposed along the southern side of the service yard. The need for this acoustic fence was identified in the Environmental Statement (Noise Chapter) in order to protect residential properties on Far Moor Lane from unacceptable noise impacts as a result of the development. The fence would be set back in excess of 30m from the Coventry Highway, beyond new planting. Whilst the fence would be visible from both Coventry Highway and the public footpath, it would be viewed through new planting which would effectively soften its impact. I therefore consider the impact of this acoustic fence on the visual amenity of the area to be acceptable.
- 5.2.18 A 2.4m high security fence is proposed to all other boundaries of the proposed service yard. This would be functional in appearance but the need for it is understood and it too would be screened. I consider the proposed boundary treatments to be acceptable.
- 5.2.19 In order to facilitate a building and its associated service area to the size proposed, alterations to the existing ground levels are required. As existing, the site slopes upwards in a north-easterly direction, away from the Coventry Highway. As proposed, the service yard would be between 0m and 3m higher than the Coventry Highway (when measured at the site entrance - 101m), whilst the building would be up to 4.6m higher than the Coventry Highway on its southern elevation. Both the service yard and building would be cut into the slope as it rises toward the woodland to the north of the site, and Gorcott Hall to the northeast of the site.
- 5.2.20 On the basis of no objections being raised by relevant consultees in respect of the levels adjacent to the woodland, I am satisfied that they would not have a significant impact on the woodland as a result of leaving its edge perched; something which was raised as a potential concern in the consultation responses received to 18/01596/S73. The levels mean that the building is on a much lower level than Gorcott Hall which will minimise any associated impact on its setting.

Furthermore, whilst on higher land than the Coventry Highway, I am satisfied that the resultant impact on the visual amenity of the area is acceptable. The building would be set back approximately 75m from the highway at its closest point behind significant areas of new planting, minimising its impact on public views.

5.2.21 In light of this, I consider the proposed levels to be acceptable.

5.2.22 In light of the assessment above, I am satisfied that the landscaping as proposed through this reserved matters submission is acceptable, and accords with Policies BDP19 and BDP21.

5.3 **Layout**

5.3.1 Policy BDP19 states that *“the Council will deliver high quality people focused space through among other criteria e. Ensuring development enhances the character and distinctiveness of the local area”*

5.3.2 Paragraph 6.2.8 of the BDC High Quality Design SPD states that *“the relationship between the proposed development and existing buildings and features in the area should be considered when designing the proposal”*

5.3.3 Condition 8 of 18/01596/S73 sets out the plans approved as part of the outline element of the planning permission. Approved through this condition is the Parameters Plan which identifies the location and areas for various Employment Zones, as well as areas of green infrastructure and the conservation landscape buffer zone adjacent to the Grade II* listed Gorcott Hall. The Parameters Plan also identified a green corridor between two of the Employment Zones to facilitate connectivity for wildlife species.

5.3.4 The layout proposed under this reserved matters application is consistent with the Parameters Plan. The main building is located within the Yellow Employment Zone, with parking and service yards within the Grey Employment Zones. The conservation landscape buffer is located adjacent to Gorcott Hall, and an undeveloped area of Green Infrastructure is proposed to the eastern part of the site. A green corridor, comprising retained hedgerows and trees, as well as new planting, is proposed between the two car parking areas.

5.3.5 The service yard and lorry parking would be located to the north, south and west of the building, with the two car parking areas to the east. The car parking areas are split with an internal access road for bus drop off points whilst providing an additional link to the service yard for use if required. The car parking area is split into two and on different levels to allow for the retention of two existing hedgerows running across the site. The internal access road to the car parking area has been designed to wrap around a retained mature tree (T18).

5.3.6 Existing industrial buildings on Ravensbank Drive are located to the west of the site. The relationship between the proposed building and these existing buildings is acceptable.

5.3.7 The nearest residential development to the site is located to the south side of Coventry Highway, off Far Moor Lane. The proposed building would be located in excess of 240m from the closest dwelling located on Far Moor Lane. Section BB on the Proposed Sections plan (drawing no. 6290-104D) shows the relationship between this dwelling and the proposed building. Whilst of a significant height and bulk, the 25 degree test is met by a considerable margin when taken from the windows in this property. A computer generated image has been provided by the applicant which shows the building in wire frame form as it would be seen from the first floor windows of the closest dwelling (located at the corner of Far Moor Lane and Kingham Close). It demonstrates that the building would be generally hidden from view beyond existing vegetation located outside of the application site. If this vegetation were to fail in the future, and the building were to become visible, I do not consider that the resultant impact on the amenity of this dwelling (as opposed to the view from it) would be significantly impacted upon.

On-site parking

5.3.8 Condition 26 of 18/01596/S73 requires the submission of details of vehicle and cycle parking to be submitted with reserved matters submissions where approval of layout is sought.

5.3.9 The proposed site plan identifies numbers and locations of car (including accessible spaces), cycle and motorcycle parking.

5.3.10 Within the two areas of car parking to the east of the building, there is a total of 469 car parking spaces, of which 24 would be accessible spaces. In addition, 60 cycle spaces, and 24 motorcycle spaces are proposed. There are 106 HGV loading bays, and 125 HGV parking bays proposed.

5.3.11 A building of 34,041 sqm (measured externally) is proposed. The SPD seeks the provision of 434 car parking spaces. A total of 469 car parking spaces are proposed, which includes 24 accessible spaces. The Transport Technical Note submitted with the application states that the level of spaces would allow for sufficient parking for staff throughout the year, including in the busy two month period in the run up to Christmas when temporary staff would be employed. I consider this level of on-site car parking to be acceptable.

5.3.12 Paragraph 6.2.23 of the BDC High Quality Design SPD states that *“Adequate parking should be provided, with areas for service vehicles to park and turn if necessary. Parking areas should include some landscaping features and screening in order to reduce the visual impact. Cycle parking must also be provided along with cycle paths and footpaths in and out of the site. Adequate cycle storage of an appropriate size should be included as part of the development. These standards are set out by Worcestershire County Council Highways Department.”*

5.3.13 WCC Highways have raised no objection to the proposal in respect of parking provision.

Electric vehicle charging

- 5.3.14 Policy BDP16 (16.3) states that *“The Council will support the use of low emission vehicles including electric cars through encouraging the provision of charging points in new developments.”*
- 5.3.15 Condition 27 of 18/03846/VARY requires the submission of details of the amount, location and specification of proposed electric vehicle charging points (EVCP) and/or details of the associated cabling proposed to facilitate subsequent installation of those EVCPs for each phase of development.
- 5.3.16 The Transport Technical Note submitted with the application states that 48 spaces (equivalent of 10% of the total car parking provision) would be installed with electric vehicle charging points and that they would be operational prior to occupation. It is proposed that 2 no. 22kW charging spaces would be provided for visitors in the vicinity of the entrance, with the remaining 46 spaces being 7kW charging points. The latter would enable full charge in 5-7 hours to allow staff to charge vehicles during a typical shift.
- 5.3.17 When having regard to the contents of the SPD, the EVCP scheme proposed is compliant save for the provision of a rapid charging point per 50 spaces. This represents a shortfall of 10 rapid charging EVCPs to parking spaces on site. The justification provided by the applicant for this is that the majority of people parking on site would be workers who would be in situ for a number of hours – therefore the 22kW (as opposed to the SPD requirement for 43kW/50kW) would be adequate to enable sufficient charging over this period. On balance, I consider the scheme of EVCPs to be acceptable.
- 5.3.18 Worcestershire County Council Highways has requested the attachment of a condition requiring that the EVCPs are installed prior to first use. However, this is suitably covered by condition 27 on 18/01596/S73. I therefore do not consider that this condition meets the condition tests.
- 5.3.19 In light of the above, I consider the layout to be acceptable and compliant with Policies BDP 16 and BDP19.

5.4 **Scale**

- 5.4.1 Policy BDP19 seeks to achieve high quality design which reflects the character and distinctiveness of the locality.
- 5.4.2 Paragraph 6.2.3 of the BDC High Quality Design SPD requires that *“The proposed development should be in scale with surrounding developments and not be visually intrusive due to its scale and massing. Where possible large buildings should minimise their impact through having low building heights and use of a curved roof.”*

- 5.4.3 The Parameters Plan approved under condition 8 of 18/01596/S73 includes maximum building heights for the various Employment Zones. As described in the Principle of Development section above, this reserved matters complies with the maximum heights detailed on the approved Parameters Plan.
- 5.4.4 A building of a very large footprint is proposed. The main bulk of the building (not including the office/welfare projections) extends to 225m in width, and 137m in length. However, the resultant impact is not unacceptable. It is the only building that would occupy the northern development parcel, with a meaningful area of green infrastructure formed toward the eastern boundary of the site, and extensive landscaping to all other sides. I do not consider that the large footprint of the building gives rise to concerns regarding overdevelopment of the site.
- 5.4.5 Large buildings are commensurate with buildings to be used for B8 (storage and distribution) purposes. Indeed there are a number of large industrial buildings located on Ravensbank Drive to the northwest of the site. Whilst the footprint of the proposed building is noticeably larger, I do not consider its scale to be inappropriate when considering the context within which it would sit.
- 5.4.6 Having considered the scale of the development proposed, I am satisfied that the height, width and length of the buildings proposed is appropriate, complying with Policy BDP19 and BDP High Quality Design SPD.

6.0 Other matters

6.1 Highways trip generation

- 6.1.1 A Transport Assessment was submitted with the original application 17/00701/OUT which sought hybrid planning permission for the development of the Redditch Gateway site in its entirety.
- 6.1.2 The subsequent S73 application 18/01596/S73 which sought to vary the parameters for development through an amended Parameters Plan was accompanied by a Traffic and Transport Statement of Conformity. This confirmed that the previous Transport Assessment remained valid in assessing the S73 changes. This was confirmed by both Worcestershire County Council and Warwickshire County Council Highways teams who raised no objection to the S73 application subject to the attachment of the highways conditions which were attached to the original hybrid consent.
- 6.1.3 A Transport Technical Note (ref. RGNP-BWB-GEN-XX-RP-TR-0001_TN1 Rev P9) has been submitted with this reserved matters application. This note compares the trip generation from the floorspace assumed to be located in the northern development parcel in the Transport Assessment submitted under 17/00701/OUT, with the trip generation for a 34,041 sqm (GEA) B8 building based on accepted trip rates from the same document. The below table shows the trip generation comparison:

Trip Generation based on agreed from 2017 BWB TA										
Scenario	Vehicle Class	AM Peak			PM Peak			Daily		
		Arrive	Depart	Two-way	Arrive	Depart	Two-way	Arrive	Depart	Two-way
Northern Plot	Total	217	44	261	44	189	233	831	860	1691
Outline	HGV	11	18	29	2	3	5	130	157	287
Northern Plot	Total	32	24	56	9	36	45	355	398	752
Reserved Matters	HGV	4	11	16	3	4	7	134	181	316
Variation	Total	-185	-20	-205	-35	-153	-188	-476	-462	-939
	HGV	-7	-7	-13	1	1	2	4	25	29

6.1.4 This table demonstrates that the 34,041 sqm B8 building would generate less traffic than the floorspace assessed in the Transport Assessment during peak periods and throughout the day. It would also generate fewer HGVs during the morning peak hour but would result in marginal increases during the evening peak hour and throughout a day. The Transport Technical Note states that the marginal increases would remain well within the HGV trip generation envelope of the full Redditch Gateway development and any capacity implications would be more than off-set by the reduction in total traffic, it is considered that the traffic generation of the proposed B8 building also falls within the parameters assessed within the Transport Assessment.

6.1.5 Highways England has been consulted on the application and has raised no objection.

6.1.5 Both Worcestershire County Council Highways team, and Warwickshire County Council Highways team have been consulted on the application.

6.1.6 Initially objection was raised by Worcestershire CC for the following reasons:

- Justification for proposed level of parking (required by Worcestershire County Council's "Streetscape Design Guide") had not been provided; and
- The internal layout fails to accord with the Streetscape Design Guide for an "Industrial Access Road"

6.1.7 Following the submission of amended information to address these objections, Worcestershire County Council Highways has raised no objection.

6.1.7 This was subject to a number of conditions. I have addressed the request for an EVCP condition under the 'Layout – electric vehicle charging' section above. A condition has been requested to require the submission and approval of sheltered and secure cycle parking details. I consider sufficient information has been submitted with this reserved matters submission. A condition has also been requested to require the submission and approval of details for showers and lockers to be installed in the building. I do not consider that BDC has a policy which would make the attachment of this condition necessary. However, matters such as this may be picked up when the Employment Travel Plan is submitted to discharge condition 25 of 18/01596/S73.

6.1.8 Warwickshire County Council Highways has also raised no objection to the application. No conditions are recommended. I am therefore satisfied that no additional transport related impact would arise as a result of the reserved matters as proposed.

6.2 Heritage Matters

- 6.2.1 Policies BDP1 and BDP20 seek the protection and enhancement of the District's historic environment.
- 6.2.2 The impact of the development on heritage assets was fully considered at outline stage, and it is not considered that the reserved matters application would further impact on the setting of nearby heritage assets or potential archaeological features within the site.
- 6.2.3 No objections have been raised by Historic England the SDC Conservation Officer or BDC/RBC Conservation Officer. I am satisfied that no additional impact would arise to heritage assets as a result of the reserved matters as proposed.

6.3 Climate change

- 6.3.1 Policy BDP19 seeks to ensure that states that all non-residential developments meets BREEAM 'very good' standard or other successor guidance, and that developers should seek to exceed these standards where it is viable to do so.
- 6.3.2 The applicant has confirmed that the development would comply with BREEAM 'Good' standard. In addition, Section 4.9 of the Design and Access Statement deals with sustainability matters and states *'The design of the building will allow for full coverage of photovoltaics on the roof. The final area utilised will be determined after detailed design of the mechanical and electrical system'*.
- 6.3.3 Additional information has been received from the applicant in respect of this issue. The development will target EPC rating A and this could be achieved through a variety of methods, including through the installation of solar photovoltaics (PVs). The applicant has confirmed that the roof is to be design PV ready so that it can take the loading of PV panels if the intention is to install them.
- 6.3.4 Whilst this does not meet the 'very good' standard required by Policy BDP19 it does provide a satisfactory standard balanced against the other benefits of the scheme.

6.4 Anonymous occupier

- 6.4.1 Parish Council and third party representations have been received which raise concern that the future occupier of the building is not known. The Design and Access Statement states 'For commerciality reasons, and to maintain their competitive edge within the market, the end user is unable to confirm their branding until they have the certainty of a reserved matters approval'.
- 6.4.2 A planning permission is not granted for a specific occupier/business/individual (except where the personal circumstances of an individual justify the granting of a planning permission), but sits with the land/buildings upon it. The identity of the future occupier is not a relevant material planning consideration, nor is it required in order to make a comprehensive assessment of this reserved matters application.

7.0 Conclusions

- 7.1 The principle of the development of the application site was granted planning permission in June 2018 under 17/00701/OUT, and subsequently varied in April 2019.
- 7.2 I consider that the current application should be determined in accordance with the adopted Development Plan which comprises the Core Strategy. I can identify no material considerations that warrant an alternative approach.
- 7.3 Policy BDP1 states that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- 7.4 On the basis of the above considerations I have concluded that the proposal is sustainable development. I therefore consider that the presumption in favour does apply in this case and that this reserved matters application should be granted.
- 7.5 Whilst officers have made a recommendation on the basis of the Development Plan and other material considerations it is for the Committee to weigh and balance these in coming to a decision, based on their judgement of the available evidence.

8.0 RECOMMENDATION:

- a) Minded to **APPROVE** the reserved matters
- b) That **DELEGATED POWERS** be granted to the Head of Planning and Regeneration to agree the final scope and detailed wording and numbering of conditions.

Conditions:

Please Note: On this occasion the conditions are not presented in their final form, as it may be necessary to adjust the final wording to ensure compatibility across the three Local Authorities and to take into account phasing requirements of the scheme.

1. Approved plans
2. Access, parking and turning areas to be provided prior to first use
3. Final design for diverted public right of way to be submitted to show 2m between the edge of the public right of way/associated planting and the diverted brook
4. Implementation of soft landscaping
5. Replacement of soft landscaping
6. No dig construction where hardstanding incurs into RPA of T18

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