

Beckingham Parish Council

Lincolnshire

Chairman: Lawrence Tatton

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Dear Sirs

Planning Objection – Plots 1 to 17 inclusive Land Off A17 Adjacent To The River Witham, Beckingham, Lincolnshire ("the Development Site")

Planning Application References ("together the Application")

- **Plot 1 - 22/0081/FUL**
- **Plot 2 - 22/0083/FUL**
- **Plot 3 - 22/0084/FUL**
- **Plot 4 - 22/0085/FUL**
- **Plot 5 - 22/0086/FUL**
- **Plot 6 - 22/0088/FUL**
- **Plot 7 - 22/0089/FUL**
- **Plot 8 - 22/0090/FUL**
- **Plot 9 - 22/0091/FUL**
- **Plot 10 - 22/0092/FUL**
- **Plot 11 - 22/0093/FUL**
- **Plot 12 - 22/0094/FUL**
- **Plot 13 - 22/0095/FUL**
- **Plot 14 - 22/0096/FUL**
- **Plot 15 - 22/0097/FUL**
- **Plot 16 - 22/0098/FUL**
- **Plot 17 - 22/0099/FUL**

Proposed Development: Plots 1 to 17 inclusive - Change of use from equestrian to residential to accommodate 1 static caravan, 1 touring caravan (parking) brick and tile built day room, parking for 2 vehicles and associated service roads ("the Proposed Development").

Beckingham Parish Council wish to strongly object to the Application, we have serious concerns in respect of the detrimental impacts of the Proposed Development upon the character of the landscape in this area and highway safety along the A17. Having taken legal advice the Parish Council have considered the Proposed Development in detail and set out below the material issues, which we consider need to be given significant weight and consideration in the determination of the Application. This letter of objection is submitted to North Kesteven District Council ("the Council") against the

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Application, and in order to protect the interests of the Parish of Beckingham against inappropriate development in the open countryside.

In considering the Proposed Development against the applicable local and national policies we would draw the Council's attention to the following material concerns:

- Impacts on highway safety;
- Impacts upon local services and infrastructure, including education and healthcare;
- The existing level of local provision and need for sites;
- The availability of alternative accommodation for the applicants;
- Sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;
- Promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children;
- Impacts on ecology;
- Flooding;
- Impact on landscape character and visual appearance.

Legal and Technical Matters:

Following the receipt of legal advice on the Application, the Parish Council wish to draw the Council's attention to the following legal and technical issues in respect of the Application submitted to the Council for the Proposed Development.

1. Ownership Certificates:
 - a. It is not clear from our review whether each respective plot on the Development Site is owned by each individual applicant, or whether there is a single landowner of the whole site area. In any event, the individual ownership certificates in respect of each individual plot need to be properly reviewed to ensure that they have been correctly completed. As the Council are aware, an application is not valid, and therefore cannot be determined by the local planning authority, unless the relevant certificate has been completed. It is an offence to complete a false or misleading certificate, either knowingly or recklessly, with a maximum fine of up to £5,000.
2. Splitting up of the Application into plots and the EIA Regulations:
 - a. It is noted that multiple applications have been submitted in respect of the Development Site for each proposed plot, the reasons behind this are not clear. However, for the purposes of appropriate assessment of the scale of the development and the impacts arising, it is submitted that the applications should be considered as a single development project for 17 caravan plots with associated outbuildings and infrastructure. It is apparent that all of the plots are situated on a single planning unit, and the cumulative impacts of all plots considered together should be assessed. To be considered otherwise would be contrary to the appropriate planning of the area and the requirements of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations"). Whilst the total site area of

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the Proposed Development Site has not been provided, it appears from the site boundary plan that the total site area would be in excess of 1 hectare. The development of permanent caravan sites falls within Schedule 2 of the EIA Regulations, therefore as a minimum the Council need to screen the proposal (taken as a whole) to determine whether significant effects on the environment are likely to arise. It has been well established in case law that the artificial splitting of site boundaries in respect of applications for development, or so called 'salami slicing', to avoid the application of EIA requirements is not permitted (***See cases: R v. Swale BC ex p. RSPB [1991] 1 PLR 6, R (Burridge) v. Breckland DC [2013] EWCA Civ 228***). The EIA Regulations specifically refer to the need to describe and assess "the whole development" (Schedule 4, Part 1). It is clear that each of the Applications now submitted form part and parcel of the same development scheme to create a single caravan site, the plots cannot therefore be artificially split into separate applications in order to try and avoid the need to comply with the EIA requirements, and/or any other planning obligations, and assessments that may be required in order to appropriately assess the cumulative impacts of this proposal as a whole. It is not clear to us whether a screening opinion has been applied for, or provided by the Council, in respect of the Proposed Development.

3. Lack of detailed information:

- a. As noted below, there is a lack of appropriately detailed information submitted with the Application in respect of the likely impacts arising from traffic, ecology, flooding, drainage, landscaping and planting to be provided on the Development Site. It is suggested that the Application cannot be appropriately assessed without this information.

4. Legal Criteria for Gypsy and Travellers sites:

- a. It is not clear from the Application details submitted whether the applicants meet the legal criteria of a gypsy or traveller for the purposes of the application of the relevant planning policies. Have the Council been provided with sufficient information and justification on these grounds?

5. Retrospective:

- a. It is noted that works were commenced on the Development Site prior to the submission of the Application. The extent of the works already carried out on the Development Site have not been made clear within the Application. This should be clearly documented and taken into account in the consideration of the Application. The Application documents also need to properly provide that the Application is in part retrospective.

Application of Planning Policy:

Applications for planning permission should be determined in accordance with the development plan unless material considerations indicate otherwise. In this case the relevant development plan is the

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Central Lincolnshire Local Plan 2017 ("CLLP"). The following policies of the CLLP are considered relevant to this Application and require careful consideration against the Proposed Development:

- Policy LP4: Growth in Villages
- Policy LP12: Infrastructure to Support Growth
- Policy LP13: Accessibility and Transport
- Policy LP14: Managing Water Resources and Flood Risk
- Policy LP17: Landscape, Townscape and Views
- Policy LP21: Biodiversity and Geodiversity
- Policy LP25: The Historic Environment
- Policy LP55: Development in the Countryside
- Policy LP56: Gypsy and Traveller and Travelling Showpeople Accommodation

Other Material Planning Considerations:

- National Planning Policy Framework 2021 ("the NPPF")
- Planning Practice Guidance
- Planning Policy for Traveller Sites (the "PPTS") – August 2015

Policy LP56 of the CLLP provides that applications for Gypsy and Traveller and Travelling Showpeople proposals on non-allocated sites, will be considered against the following criteria:

*"a. The proposal **should not conflict with other local or national policies relating to flood risk, contamination, landscape character, protection of the natural and built environment, heritage assets or agricultural land quality;** and*

*b. **Must have adequate and safe vehicular access;** and*

*c. **Must have sufficient space for vehicle manoeuvring and parking within the site;** and*

*d. **Should provide an acceptable standard of amenity for the site's occupants, and will not have an unacceptable impact on the amenity of nearby residents (in accordance with Policy LP26);** and*

*e. **Should be adequately serviced, or capable of being adequately serviced, preferably by mains connections;** and*

*f. **For non-allocated sites, should be located within reasonable travelling distance to both primary health care facilities and schools, preferably by walking, cycling or public transport.***

An exception to this may be allowed in the case of Travelling Showpeople, where there is a need to locate the development close to the primary road network: in such event, access to primary health care and schools should still be achievable." (our emphasis).

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We consider each of the elements of Policy LP56 in respect of the Proposed Development below. Of particular concern is the safety of the vehicular access in respect of the Proposed Development and the conflict of the Proposed Development with other local plan policies relating to the protection of the natural landscape. The Development Site is remote in its location, and other than the unauthorised works which have already been carried out, is previously undeveloped land. The Development Site has very poor links to schools and facilities, and travel to and from the Development Site will only be possible by car. There is a distinct lack of public transport links or opportunities for walking or cycling in this location. These issues all weigh significantly against the Proposed Development, and are considered in further detail below.

Policy LP55 of the CLLP seeks to protect the open countryside and ensure that development proposals are sustainable, proportionate and appropriate to their setting. The policy provides that applications related to the siting of mobile homes will be considered in the same way as applications for permanent dwellings in the open countryside. The Policy goes on to provide that new dwellings will only be supported where they are essential to the effective operation of rural operations. It is apparent that the Proposed Development is not, in this case, essential to the effective operation of rural operations.

The explanatory text to Policy LP56 of the CLLP notes that the Central Lincolnshire Gypsy and Traveller Accommodation Assessment 2013 has identified an annual need of 3.6 new permanent Gypsy and Traveller pitches from 2013 to 2033 (72 total over this period) to meet needs arising from overcrowding and from newly forming families on authorised sites, over the whole plan area, which includes sites within the administrative boundaries of the City of Lincoln, West Lindsey and North Kesteven District Councils. There is an existing Gypsy and Traveller site within the Beckingham area which is already authorised and it is therefore questioned whether further provision in this area is needed, particularly on a site which is not considered to be in an acceptable location, given its access onto the A17. The existing site is known as Poplar Meadow and which was granted consent on Appeal, following the refusal of planning application reference: 91/0544/FUL by the Council.

Impact on Small Village, Conservation Area, Landscape and Character:

Beckingham is classified as a 'small village' within the CLLP. In addition the village is within the Beckingham Conservation Area. Section 71 of the 'Planning (Listed Buildings and Conservation Areas) Act 1990' places a statutory duty on the Council to consider how to both preserve and enhance its conservation areas as areas of architectural and historic interest. The boundary of the Beckingham Conservation Area runs up to the boundary of the A17. Policy LP25 of the CLLP also refers to conservation areas and requires that where a development proposal would affect the significance of a heritage asset (whether designated or non-designated), **including any contribution made by its setting**, the applicant will be required to undertake the following, in a manner proportionate to the asset's significance:

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"a. describe and assess the significance of the asset, including its setting, to determine its architectural, historical or archaeological interest; and

b. identify the impact of the proposed works on the significance and special character of the asset; and

c. provide clear justification for the works, especially if these would harm the significance of the asset or its setting, so that the harm can be weighed against public benefits. "

It is suggested that due to the proximity of the Development Site to the boundary of the Conservation Area, there will be an impact on the setting of the conservation area, including the views into and out of it. As such it is considered that the above information will be required to be submitted with the Application. It appears that this has not been provided. Without such information the impacts of the Proposed Development upon the setting of the Beckingham Conservation Area cannot be appropriately assessed and weighed in the planning balance and the Council will have failed to fulfil its statutory duty to preserve and enhance the conservation area. Policy LP25 provides that unless it is explicitly demonstrated that the proposal meets the tests set out in the NPPF, permission will only be granted for development affecting designated or non-designated heritage assets where the impact of the proposal(s) does not harm the significance of the asset and/or its setting.

The CLLP provides that in relation to 'small villages' unless otherwise promoted through a neighbourhood plan or through demonstration of clear local community support development will be limited to around 4 dwellings, or 0.1 hectares per site for employment uses. Policy LP4 establishes the total level of % growth for each 'small village', and further policy requirements in respect of identifying whether a site would be suitable for development. Sites outside of settlement boundaries and in remote locations are considered to be inappropriate for development under this Policy. The scale and impacts of the Proposed Development need to be properly considered against the local landscape and facilities available. The development of the Site for 17 plots with associated outbuildings and infrastructure is considered to be major development of a type which could not be readily be accommodated in this location. The number of families likely to be resident on the Development Site at any one time would be significant and it is apparent that the local infrastructure and services are inadequate to accommodate the additional number of local residents.

Having considered the submitted plans it is also noted that there is a lack of detail provided in respect of how the Development Site will be provided with electricity, drinking water supplies, washing facilities, drainage, sewage disposal, and regular refuse collections. Given the number of plots proposed on the Development Site, it is imperative that such provisions are considered and adequately addressed.

Within the North Kesteven Landscape Character Assessment Report prepared in support of the CLLP, Beckingham falls within the Witham and Brant vales character area. This area of the landscape is characterised by,

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"attractive, small nucleated and sometimes linear villages of red brick and pantile construction to the central and western extent of the sub-area." In addition, "hedgerows are noted as a distinctive feature of the Trent and Witham Vale, and offer one of the most important opportunities for wildlife corridor restoration". The Report goes on to provide that, "pockets of traditional grazing land have become rare, these rare fragments of grassland support a diversity of plant and invertebrate life, which varies with soil type. The Trent and Witham Vales host a variety of soil types reflecting the range of underlying geology. Seasonal inundation of water on lower land close to the Witham and Brant creates wet grassland habitat suitable for feeding and breeding waders such as lapwing and snipe."

It is made clear within the Report that the landscape is sensitive to change and the wrong type of development in the wrong location, or badly designed development can damage the integrity of the landscape character, often disproportionately to the scale of the development that caused the change. The Development Site represents a pocket of traditional grazing land along the River Witham, which supports a variety of ecology and biodiversity, particularly along the banks of the River Witham. If developed this will be lost.

Prior to the recent works being carried out, the Development Site comprised of agricultural land previously used for grazing, the grazing land abuts the River Witham and is bounded by a mature hedgerow. The Development Site is in the open countryside and other than the siting of the sewage treatment plant and the A17 the Development Site is surrounded by open countryside. It is suggested that the bank of the River Witham in this location could be a valuable area for ecology and biodiversity, yet we note that no reports have been submitted with the Application to consider the impacts of the Proposed Development on this or what biodiversity enhancements if any will be provided. Nor have any details been submitted in respect of proposed landscaping or planting, which we consider should be required, given the open countryside location of this Development Site. The Application is partially retrospective it is not clear what vegetation or planting has already been removed from the Site, if any. The laying of hardstanding, the stationing of caravans and the parking of vehicles and items of outside equipment associated with a domestic use of the Proposed Development would all impinge upon the openness of the rural location, and would have an urbanising effect on the character of the area.

In addition to the above, the Proposed Development will not reflect local built vernacular and will be visible from the A17 and surrounding area. As a result of this, it is considered that the Proposed Development would have a detrimental impact on the landscape character and visual amenity of the area. Section 11 of the NPPF relates to making effective use of land and paragraph 119 states that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding the environment. In addition, Paragraph 120 states that planning decisions and policies should:

"a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;

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b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;"

Guidance in the PPTS states that, "***local planning authorities should strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan and sites in rural areas should respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on local infrastructure.***" It is submitted that the Proposed Development does not comply with this guidance or the policies contained in the CLLP which aim to protect the open countryside from inappropriate forms of development. The Proposed Development is not in keeping with the rural landscape and the proposals will cause an adverse effect on the character and appearance of the area in visual and spatial terms, from the introduction of caravans on the open green field land. This will be exacerbated by the further built form of the proposed day rooms, associated infrastructure and hardstanding.

Visual Amenity:

Policy LP26 of the CLLP provides that all development proposals must achieve a high quality sustainable design that contribute positively to the local character, landscape and townscape and supports diversity, equality and access for all. It provides that developments should:

" c. Respect the existing topography, landscape character and identity, and relate well to the site and surroundings, particularly in relation to siting, height, scale, massing, form and plot widths;

e. Not result in ribbon development, nor extend existing linear features of the settlement, and instead retain, where appropriate, a tight village nucleus;

g. Incorporate appropriate landscape treatment to ensure that the development can be satisfactorily assimilated into the surrounding area;

h. Provide well designed boundary treatments, and hard and soft landscaping that reflect the function and character of the development and its surroundings;

i. Protect any important local views into, out of or through the site;

k. Use appropriate, high quality materials which reinforce or enhance local distinctiveness, with consideration given to texture, colour, pattern and durability;"

The Proposed Development of 17 Plots and associated infrastructure is considered to represent an overdevelopment of this green field site. The caravans, outbuildings and associated infrastructure will be incongruous in the landscape and whilst there is a large hedge along the boundary of the Development Site with the A17, the development will be visually prominent from other viewpoints and in passing along the A17. Details do not appear to have been submitted setting out the proposed landscaping or planting as part of the Application.

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The PPTS requires that planning authorities should give consideration to whether proposed gypsy and traveller sites would be "***well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness***" and avoid "*enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.*"

Policy LP26 further provides that proposals should demonstrate that adequate provision has been made for storage, sorting and collection of household and commercial waste, including provision for increasing recyclable waste. From our review of the Application submitted there does not appear to have been any consideration of this requirement, nor have any details been submitted which demonstrate how this will be addressed. 17 plots with multiple families will generate a substantial amount of waste which will need to be appropriately dealt with.

Impact on Residential Amenity:

Paragraph 130(f) of the NPPF states that planning decisions should create places that promote health and well-being with a high standard of amenity for existing and future users. Given the proximity of the Development Site to the A17, the firing range, and the sewage treatment plant, it is not considered due to noise levels from the A17 and firing range, and smells from the sewage plant that occupiers would have an acceptable level of residential amenity. In addition to this and due to the Sites remote location, accessibility to services and facilities will all require journeys by car. Given the scale of the Proposed Development and the likelihood that it will accommodate families with children, it is submitted that some measures to ensure safety from the River Witham should be submitted to ensure that there are no safety risks and that there is sufficient and suitable boundary treatments available to prevent access to the River Witham.

The firing range is in active use and is regularly used for military and RAF manoeuvres including target practice. The Parish Council are notified at times when the noise will be particularly bad, so that residents can be advised. With the Development Site, being in such close proximity the noise from the firing range will be much louder in this location. The Parish Council are also concerned for the safety of children of the families on the Development Site, who may access the firing range land given its close proximity to the Development Site.

No details have been submitted with the Application as to what lighting on the Site if any will be provided. Any lighting on columns would have a detrimental impact not only on users of the A17 but also those residents in Beckingham that have views across the Site.

The Proposed Development should not result in an unacceptable adverse impact on the amenity of nearby residents particularly in rural and semi-rural settings where development is restricted overall.

Impact on Highway Safety

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As set out above, the main access and egress from the Development Site is directly onto and off the A17. This is an extremely busy road and is not considered to offer a safe and convenient access to the Development Site. As the Site is so remote in location the only way to get to local services and facilities will be by private car or van, given the number of proposed Plots on the Development Site and likely number of families residing on it at any one time, this will generate a significant number of vehicular trips in and out of the Development Site. This particular stretch of the A17, from which the access is proposed, is set at the national speed limit, there is no turning space or slip road proposed to aid access and egress from the Development Site. In addition, those occupants wanting to exit the site to travel towards Newark or returning to the site from Sleaford would have to turn across the A17, which is not considered to be safe or practical given the speed of traffic along this stretch of the road. This stretch of road is known to be particularly dangerous given the speed of traffic travelling along it and also overtaking of slower moving HGV's. The Parish Council are aware that in order to access the Development Site the proposed Applicants have been seen turning across from the westbound carriageway towards Woodgate Lane and then driving along a stretch of the grass verge against the flow of the oncoming traffic. We are aware of a number of accidents along this stretch of road and if these methods of access continue to be used, it will make it unsafe not only for the Applicants but also those using the A17 travelling from Newark to Sleaford.

In addition, the Proposed Development does not offer any reasonable or practical ways of accessing the site on foot or by bicycle. Given the number of plots proposed, it is likely to be attractive to families and children, without such additional facilities the Proposed Development fails to provide safe, convenient and attractive accesses for all, including the elderly and disabled, and others with restricted mobility, and does not provide links to any existing network of footways, bridleways and cycleways.

Paragraph 110 of the NPPF states that in assessing applications for development, it should be ensured that:- "a) **appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;** b) **safe and suitable access to the site can be achieved for all users;** and d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*"

The Application does not appear to contain any submitted information relating to proposed vehicular movements, road improvements or sufficient details of the access arrangements to the Development Site. Given the levels of vehicular movements likely to be generated by the 17 Plots now proposed, onto a busy classified A road, it is submitted that the Application fails to properly address and/or ensure that safe and suitable access to the Development Site can be achieved for all users. This is contrary to CLLP Policy LP56 and the guidance contained in the PPTS. It is noted that the Development Site does not have any footpaths or other sustainable modes of transport available and no information has been submitted in accordance with the requirements of Paragraph 110 of the NPPF to set out how this lack of provision would be addressed. Overall it is not considered that the

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lack of safe access and egress from this Site can be cost effectively mitigated and for those reasons alone it is suggested that the Application should be refused.

Flood Risk

The Development Site abuts the River Witham, the banks of which are shown to be within Flood Zone 3. In addition it is noted that the land on the opposite side of the River Witham, directly opposite the Proposed Development is within Flood Zone 3. It is noted that the proposed plots will be sited in close proximity to the banks of the River Witham and a Flood Risk Assessment has not been provided. On reviewing the surface water flooding maps there is a pocket of the land at the front of the Development Site adjoining the A17 which is noted as being at medium risk of flooding. In addition, a pocket of land to the rear of the Development Site is also noted as being at High risk of surface water flooding.

No details have been submitted to address any potential for flooding from the River Witham, it is submitted that given the scale of the Proposed Development for 17 plots for multiple families details should be provided in order that the full impacts can be considered.

Ecology and Biodiversity:

Given the proximity of the Development Site to the River Witham and also the existing mature hedgerow and tree lined boundary on the Development Site it is suggested that, as a result of the scale of the Proposed Development and the likely impacts upon the ecological and biodiversity of the Development Site and the sensitive ecology along the banks of the River Witham, a detailed ecological assessment should be submitted. Paragraph 174 of the NPPF provides that planning decisions should seek to contribute to and enhance the natural and local environment by:

*"a) **protecting and enhancing valued landscapes, sites of biodiversity** or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

*b) **recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services** – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

*d) **minimising impacts on and providing net gains for biodiversity**, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

*e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, **help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;**"*

As no information or assessment has been submitted in respect of the likely impacts of the Proposed Development upon ecology and biodiversity on this green field site, a proper consideration of the

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impacts and appropriate levels of mitigation required cannot be conducted. It cannot without this information be concluded that the Proposed Development would not result in unacceptable harm to protected species or biodiversity and in particular the impacts on the ecology and biodiversity of the River Witham cannot be assessed.

Conclusion

In conclusion it is submitted that, in addition to the legal and technical issues raised above, insufficient information has been submitted with this Application to properly assess and consider the impacts likely to arise from this major development in the open countryside. The Proposed Development is not considered to comply with the requirements of the PPTS or Policy LP56 of the CLLP. The Proposed Development will, given its countryside location and prominent position, result in an unacceptable landscape and ecological impact due to the scale of the development proposed. The location of the Development Site is such that there will be no safe or convenient access off the A17 into and out of the Development Site or to local facilities or services. Therefore it is suggested that any need for the Proposed Development would not outweigh the significant harm which would result if the Proposed Development were approved. The Proposed Development is contrary to CLLP Policies LP56, LP55, LP4, LP13, LP21 and LP25, and the guidance contained within the NPPF and the PPTS.

Further and given the open countryside location of the Proposed Development it is not considered on the information submitted with the Application that the development will be of a high quality design, nor well integrated in the landscape. The Proposed Development is not considered to make a positive contribution to the local character of the area or to enhance the setting of the Conservation Area. In addition to this, it is not considered that the Proposed Development provides suitable onsite facilities such as space for children's play or appropriate services or waste collection provision.

For the reasons set out above, the Parish Council request that the Application is refused.

Yours sincerely,



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