# Perth and Kinross Council Planning and Placemaking Committee – 10 August 2022 Report of Handling by Head of Planning & Development (Report No. 22/176)

**PROPOSAL:** S42 application to remove condition 14 (bus shelter and

information board) of planning permission 18/02139/FLM

**LOCATION:** Wheel Inn, 37 Angus Road, Scone, Perth, PH2 6RA

Ref. No: <u>22/00301/FLM</u> Ward No: P2- Strathmore

# Summary

This report recommends **approval** of the application as the development is considered to comply with the relevant provisions of the Development Plan and there are no material considerations apparent which outweigh the Development Plan.

# **BACKGROUND AND DESCRIPTION OF PROPOSAL**

- This application was previously presented to the Planning and Placemaking Committee on 1 June 2022. The Committee deferred the application to allow further background work to be undertaken in relation to options to provide a bus shelter and information board. This included a request that the applicant contact the Scone Surgery, in respect of installing a bus shelter on land understood to be in their ownership/control, and what the outcome of that contact was. In addition, the applicant was asked to provide information on alternative sites which had been considered and discounted, regarding the location and deliverability of a bus shelter. The outcome of these requests is contained in paragraphs 49-54.
- The site benefits from planning permission for 51 retirement living apartments, including 13 affordable apartments, provided across two blocks which are age restricted (by planning condition) to residents aged 55 and over. To facilitate the development, the proposal included the demolition of the existing public house and restaurant known as the Wheel Inn.
- The application site is located within the Scone settlement boundary and extends to 0.71 hectares in area (7100sqm). The site has a main vehicular access from Angus Road, with a secondary access from Stormont Road to the north. The site is bounded by a doctors' surgery to the north, residential properties to the south and west and larger dwellinghouses to the opposite side of Angus Road to the east (elevated by topography). The topography of the site is variable, with the ground sloping down from Angus Road towards the car parking and then rising again to the rear of the site.

- 4 Section 42 of the Act (Town and Country Planning (Scotland) Act 1997 (as amended) relates to applications for planning permission to develop land which depart from conditions attached to an existing permission. The effect of granting permission via a Section 42 (S42) application is therefore such that a new and separate permission exists for the development with different (or no) conditions attached. The previous planning permission remains unaltered by, and is not varied by, the decision on the section 42 application.
- The primary purpose of this S42 application seeks to remove Condition 14 of the extant planning permission 18/02139/FLM.
- 6 The original wording of Condition 14 states:

"Prior to the development hereby approved being completed or brought into use, a scheme for the location and specification of a 3-bay cantilever bus shelter and information board shall be submitted to and approved in writing by the Council as Planning Authority, in consultation with the Council's Public Transport Unit. The approved scheme shall thereafter be installed at the applicant's expense, in accordance with the agreed details and confirmed as operational by the Council's Public Transport Unit, prior to the occupation of the last residential unit.

Reason – In the interest of promoting sustainable public transport."

7 Assessment of the proposed removal of this condition is set out below.

# **Pre-Application Consultation**

The Pre-Application Consultation (PAC) requirements have been fulfilled in association with the submission of planning application 18/02139/FLM and there is no further PAC needed procedurally in relation to this S42 application.

# **National Policy and Guidance**

9 The Scottish Government expresses its planning policies through The National Planning Frameworks, the Scottish Planning Policy (SPP), Planning Advice Notes (PAN), Creating Places, Designing Streets, National Roads Development Guide and a series of Circulars.

# **National Planning Framework 2014**

10 NPF3 is a long-term strategy for Scotland and is a spatial expression of the Government's Economic Strategy and plans for development and investment in infrastructure. This is a statutory document and material consideration in any planning application. It provides a national context for development plans and planning decisions as well as informing the on-going programmes of the Scottish Government, public agencies and local authorities.

# The Scottish Planning Policy 2014 (SPP)

- 11 The Scottish Planning Policy (SPP) sets out national planning policies which reflect Scottish Ministers' priorities for operation of the planning system and for the development and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to:
  - The preparation of development plans;
  - The design of development, from initial concept through to delivery; and
  - The determination of planning applications and appeals.
- The following sections of the SPP will be of particular importance in the assessment of this proposal:

Sustainability: paragraphs 24 – 35

Placemaking : paragraphs 36 – 57

# **Planning Advice Notes**

- The following Scottish Government Planning Advice Notes (PANs) and Guidance Documents are of relevance to the proposal:
  - PAN 40 Development Management
  - PAN 75 Planning for Transport

# **Creating Places 2013**

14 Creating Places is the Scottish Government's policy statement on architecture and place. It sets out the comprehensive value good design can deliver. It notes that successful places can unlock opportunities, build vibrant communities and contribute to a flourishing economy and set out actions that can achieve positive changes in our places.

#### **DEVELOPMENT PLAN**

The Development Plan for the area comprises the TAYplan Strategic Development Plan 2016-2036 and the Perth and Kinross Local Development Plan 2019.

# **TAYplan Strategic Development Plan 2016-2036**

16 TAYplan sets out a vision for how the region will be in 2036 and what must occur to bring about change to achieve this vision. The vision for the area as set out in the plans states that:

"By 2036 the TAYplan area will be sustainable, more attractive, competitive and vibrant without creating an unacceptable burden on our planet. The quality of life will make it a place of first choice where more people choose to live, work, study and visit, and where businesses choose to invest and create jobs."

17 The following section of the TAYplan 2016 is of particular importance in the assessment of this application:

# **Policy 2: Shaping Better Quality Places**

18 Seeks to deliver distinctive places by ensuring that the arrangement, layout, design, density and mix of development are shaped through incorporating and enhancing natural and historic assets, natural processes, the multiple roles of infrastructure and networks, and local design context.

# Perth and Kinross Local Development Plan 2

- The Local Development Plan 2 (2019) (LDP2) sets out a vision statement for the area and states that, "Our vision is of a Perth and Kinross which is dynamic, attractive and effective which protects its assets whilst welcoming population and economic growth." It is the most recent statement of Council policy and is augmented by Supplementary Guidance.
- 20 The principal relevant policy is, in summary;

# Policy 60B - Transport Standards and Accessibility Requirements

21 Development proposals that involve significant travel generation should be well served by all modes of transport (in particular walking, cycling and public transport), provide safe access and appropriate car parking. The aim of all development should be to reduce travel demand by car and ensure a realistic choice of access and travel modes is available, including opportunities for active travel and green networks.

# SITE HISTORY OF RELEVANCE

- 22 <u>16/01122/FLL</u> Formation of a sensory garden, erection of boundary treatments, engineering works and other associated works Application Approved under delegated powers 16 August 2016.
- 23 <u>18/00005/PAN</u> Residential development PAN Decision Issued 12 June 2018.
- 24 <u>18/01466/FLM</u> Erection of an assisted living facility comprising 55no. accommodation units, communal area, office, store, 2no. plant rooms, bin storage, boundary treatments and formation of parking areas, landscaping and associated works. Application Withdrawn.
- 25 <u>18/02139/FLM</u> Erection of 51 retirement flats and cycle store, formation of parking and associated works. Application Approved at Planning and Development Management Committee on 14 March 2019.
- 26 <u>19/02116/FLL</u> Formation of car parking and associated works. Application Approved under delegated powers on 26 February 2020.

#### CONSULTATIONS

27 As part of the planning application process the following bodies were consulted:

#### External

28 **Scone and District Community Council** - Objection on the grounds that the bus stop is popular on the Number 7 bus route and as such the shelter and noticeboard is required by the Scone residents.

#### Internal

29 Transport Planning - No objections.

# Representations

- 30 3 representations have been received including one from the Community Council. 2 object, including the CC, and one is in support. The objection points are:
  - Increased car use/traffic
  - Perth City Centre Congestion
  - Contrary to Development Plan
- 31 These issues are addressed in the Appraisal section of the report.
- 32 The remaining letter of support suggested that as there is currently no bus shelter at the bus stop in Angus Road in the northerly direction, a shelter could be erected with a replacement notice board.

#### ADDITIONAL STATEMENTS

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Screening Opinion	EIA Not Required
Environmental Impact Assessment (EIA):	Not Required
Environmental Report	
Appropriate Assessment	Habitats Regulations AA Not Required
Design Statement or Design and Access	Not Required
Statement	
Report on Impact or Potential Impact eg	Not Required
Flood Risk Assessment	

#### **APPRAISAL**

34 Section 42(1) of the Town & Country Planning (Scotland) Act 1997 (as amended) relates to applications for planning permission for the development of land without complying with conditions subject to which a previous permission was granted.

- 35 Section 42(2) requires that the Planning Authority shall consider only the question of the condition(s) subject to which planning permission should be granted, and:
  - (a) If they decide that planning permission should be granted subject to conditions differing from those subject to which the previous permission was granted, or that it would be granted unconditionally, they shall grant planning permission accordingly;
  - (b) If they decide that planning permission should be granted subject to the same conditions as those subject to which the previous permission was granted, they shall refuse the application.
- The determining issues in this case are whether the proposal complies with Development Plan policy or if there are any other material considerations which justify a departure from that policy. Currently the adopted Development Plan comprises the TAYplan Strategic Development Plan 2016–2036 and the Perth and Kinross Local Development Plan 2019. The relevant policy considerations are outlined in the policy section above and are considered in more detail below. In terms of other material considerations, this involves national policy and guidance, the Council's other approved policies, supplementary guidance, statutory consultees and additional statements submitted.

# **Principle**

- 37 The detail of the development subject of this application has been previously established through the approval of the extant planning permission (18/02139/FLM), and is therefore not reviewed as part of this S42 application. The removal of Condition 14 (a scheme for the location and specification of a 3-bay cantilever bus shelter and information board) is not in itself considered to be contrary to the general terms of the Development Plan, however, consideration must be given to the specific characteristics of the amendment and whether any adverse impacts are anticipated.
- 38 The original wording of Condition 14 of planning permission 18/02139/FLM states:
  - "Prior to the development hereby approved being completed or brought into use, a scheme for the location and specification of a 3-bay cantilever bus shelter and information board shall be submitted to and approved in writing by the Council as Planning Authority, in consultation with the Council's Public Transport Unit. The approved scheme shall thereafter be installed at the applicant's expense, in accordance with the agreed details and confirmed as operational by the Council's Public Transport Unit, prior to the occupation of the last residential unit.

Reason – In the interest of promoting sustainable public transport."

The applicant proposes the removal of Condition 14 as Perth and Kinross Council's Public Transport Unit specified the bus shelter is to be provided to the existing bus stop location on Stormont Road. In a supporting statement, the applicant has stated that the existing footpath in this location is not wide enough to accommodate a bus shelter, requiring it to be set back within the grounds of Scone Surgery.

The supporting statement further states that the applicant can only install the bus shelter either within their site or on Council owned land or adopted land and that it is unreasonable for the Council to require the applicant to negotiate with another landowner to provide the bus shelter within their land. As a result, they state that they are unable to comply with the requirement of this condition, hence they are seeking the removal of the condition.

# **Roads and Transport**

- The wording of Condition 14 does not specify an exact location for the bus shelter. It states a scheme for the *location* and specification of a 3-bay cantilever bus shelter and information board shall be submitted. The applicant submitted a scheme for a bus shelter at an existing bus stop in Angus Road, however, after consultation, the Council's Public Transport section specified it was to be located in the same location as existing stop on Stormont Road, at Scone Surgery.
- The Public Transport section acknowledged that in order to maintain footpath accessibility, there would be a need to set the shelter back in the grounds of Scone Surgery, with liaison with the Surgery regarding this.. The supporting statement states they can only provide the bus shelter if it is to be located within the application site or on Council owned or adopted land and that the Council cannot reasonably require negotiations to take place with another landowner to provide the facility within third party title. Confirmation has been provided from the applicant that they have not contacted Scone Surgery and have no intentions in doing so.
- With regard to public transport, there is a frequent bus service operating near the application site. Service No 7 calls at a stop (Stormont Road Surgery) approximately 50 metres from the nearest residential block on Stormont Road heading west and there is an adjacent bus stop (opp. Stormont Road Surgery) heading east. These stops are part of a circular route leading into Perth City Centre and Hillend beyond. Other stops where shelters are present are within walking distance on Angus Road to the east and Mansfield Road to the south, albeit a much further distance than the stops at the Surgery on Stormont Road. The service runs at approximately 20 minute intervals between 06.11 hours and 18.33 hours then moves on to an hourly service after 19.00 hours. There is also a well serviced Park and Ride facility within Scone which also runs at approximately 20 minute intervals.
- The objections have expressed concerns that a shelter is required in this location to serve the development as it is aimed at persons over 55 and the level of parking within the development does not allow for multiple cars per household requiring reliance on public transport.
- It is recognised through the objections received that there is a perception that the absence of a bus shelter in this location would give rise to an increase in traffic movements leading to congestion within Perth city centre. It is clear that both national and local planning policies require new developments to be sustainable. In order to offset the potential for increased unsustainable car journeys, there is no doubt public transport enhancement measures would

assist, however, there is no information to suggest that in the absence of a bus shelter in this location, car usage would increase and the use of public transport would be reduced. It is, therefore, considered that the current arrangements would not discourage the use of public transport.

- As noted above, the applicant has stated that it is unreasonable for the Council to require negotiations with another landowner. Conditions requiring works on third party land outwith the control of applicants is not appropriate and if the position had been known during the consideration of permission 18/02139/FLM the condition would not have been recommended.
- In summary, Condition 14 was imposed on the development at the request of 47 the Public Transport section, in order to support adopted planning policy which seeks to secure public transport improvements in the interests of sustainable development. But this request was without appreciation that the land required was not in the control of the applicant, thus the condition did not meet the tests for conditions in, and indeed is contrary to the express terms of Circular 4/1998. On further review and through consultation, no objections have been received to the removal of Condition 14 from the Public Transport section, who originally recommended the inclusion of this condition. Furthermore, there is no evidence to suggest that in the absence of a bus shelter in this location, public transport usage will significantly change, as a result of the proposed residential development. The existing bus service is frequent and reliable and as noted above, there is a Park and Ride facility and bus stops located on Stormont Road itself, and Angus Road within a short distance of the site. The latter of which benefits from a bus shelter. On this basis, the request to remove the condition is considered to be acceptable.

# **Outcome of Deferral**

- The applicant has advised that they have not contacted the Doctor's Surgery and do not intend to do so as they are not willing to enter into negotiations with another landowner on the issue and feel it is not appropriate for this to be requested.
- Communication has, however, taken place between the applicant and the Planning Authority in consultation with colleagues in Roads and the Public Transport Unit in respect of considering an alternative location.
- A potential suitable location was identified on the opposite side (north) of Stormont Road on an area of grass which is designated as a right of way 39/16 between Murray Road and Stormont Road. An area of approximately 2m deep by 5m long was considered to be required for the provision of a bus shelter. This location would allow the shelter to sit back off the public footpath. The existing bus stop would, however, need to be relocated further west to coincide with the location of the new shelter.
- Whilst this location would appear to be acceptable in terms of road and pedestrian safety and also acceptable in principle to the Public Transport Unit, extensive research has been undertaken previously in 2013 by PKC Estates and PKC Legal Services to establish the landowner. Unfortunately, no clarity

- could be provided and recent communication with PKC Estates confirmed the results of the earlier title search are still valid and as such it is not being taken further.
- As such the potential location identified above cannot be progressed without negotiating any formal land agreements or sale and identifying the landowner.
- In conclusion, it is clear from the discussions and work already taken that there are no effective alternative sites in close proximity to the development site.

# **Developer Contributions**

No change to developer contributions results through amending Condition 14 of planning permission 22/00301/FLM.

# **Economic Impact**

55 The economic impact from this proposal is anticipated to be limited.

#### **LEGAL AGREEMENTS**

56 Not required.

#### **DIRECTION BY SCOTTISH MINISTERS**

Under the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, regulations 30 – 33 there have been no directions by the Scottish Government in respect of an Environmental Impact Assessment screening opinion, call in or notification relating to this application.

# **CONCLUSION AND REASONS FOR RECOMMENDATION**

- To conclude, the application must be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. The proposed development in this instance relates solely to the removal of Condition 14 (bus shelter and information board). Having taken account of the Local Development Plan and material considerations, the development proposed does not conflict with the Development Plan. It should be noted that all other matters are unaffected from the existing permission and, therefore, as a new standalone permission would be granted here.
- 59 Accordingly the proposal is recommended for approval subject to the following conditions.

#### A RECOMMENDATION

# **Conditions and Reasons for Recommendation**

 The development hereby approved must be carried out in accordance with the approved drawings and documents, unless otherwise provided for by conditions imposed by this decision notice.

- Reason To ensure the development is carried out in accordance with the approved drawings and documents.
- 2. The occupation of the residential accommodation herby approved shall be restricted to occupants aged 55 and over and shall not be occupied as the sole or main residence of any occupant aged under 55 years of age.
  - Reason For the avoidance of doubt and to ensure occupation of the development hereby approved complies with the relevant Perth and Kinross Local Development Plan Policy.
- 3. The detail and timing of the on-site affordable apartment delivery as agreed in association with planning permission 18/02139/FLM (Kingdom Housing Association letter dated 24 February 2022) shall be delivered and managed in accordance with the agreed delivery mechanism and timing.
  - Reason To ensure the development is in accordance with the terms of the relevant Perth and Kinross Council Local Development Plan and to comply with the Council's policy on Developer Contributions and Affordable Housing Supplementary Guidance 2016.
- 4. In line with planning permission 18/02139/FLM (drawing number 18/02139/38), the agreed details of the specification and colour of the proposed external finishing materials to be used shall be implemented prior to the completion or bringing into use of the development, whichever is the earlier.
  - Reason In the interests of visual amenity; to ensure a satisfactory standard of local environmental quality.
- 5. As agreed on drawing number 18/02139/62 of planning permission 18/02139/FLM, all trees on site (other than those marked for felling on the approved plans) and those which have Root Protection Areas which fall within the site shall be retained and protected. Protection methods shall be strictly in accordance with BS 5837 2012: Trees in Relation to Design, Demolition and Construction. Protection measures, once in place, shall remain in place for the duration of construction. Any works required within the Root Protection Areas shall be fully justified by an arborist and a detailed construction method statement shall be submitted to and approved in writing by the Council as Planning Authority with subsequent works being undertaken to fully comply with the arborist recommendations.
  - Reason To ensure a satisfactory standard of development and environmental quality and to reserve the rights of the Council as Planning Authority.
- 6. The agreed landscaping and planting scheme in association with planning permission 18/02139/FLM (drawing numbers 18/02139/54 and 18/02139/59 shall be carried out and completed within the first available planting season (October to March) after the completion or bringing into use of the development, whichever is the earlier, and the date of Practical Completion of the landscaping scheme shall be supplied in writing to the Council as Planning Authority within 7 days of that date. The scheme as agreed and implemented

shall thereafter be maintained to the satisfaction of the Council as Planning Authority.

Reason - In the interests of visual amenity and to ensure the satisfactory implementation of the proposed planting scheme.

7. The recommendations within the supporting Bat Activity Survey Report (drawing number 18/02139/28) hereby approved shall be fully adhered to, respected and undertaken as part of the construction phase of development.

Reason - In the interests of employing best practice ecology and to ensure there is no adverse impact on any protected species as identified under the Wildlife and Countryside Act (1981).

8. No removal of hedgerows, trees or shrubs or works to, or demolition of, buildings or structures that may be used by breeding birds shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared or building affected, and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local Planning Authority.

Reason - In the interests of employing best practice ecology and to ensure there is no adverse impact on any protected species as identified under the Wildlife and Countryside Act (1981).

9. The bird box specification (Madrid swift nest box from Wildcare) and locations in association with planning permission 18/02139/FLM (drawing number 18/02139/69) shall be installed in accordance with the agreed details prior to the occupation of the relevant residential block.

Reason - In the interests of enhancing biodiversity opportunities on the site.

10. The agreed locations for bin collection presentation in association with planning permission 18/02139/FLM (drawing number 18/02139/44) shall be implemented as part of the development.

Reason - In order to ensure adequate servicing facilities are provided.

11. All plant or equipment shall be so enclosed, attenuated and/or maintained such that any noise therefrom shall not exceed Noise Rating 35 between 0700 and 2300 hours daily, or Noise Rating 25 between 2300 and 0700 hours daily, within any neighbouring residential property, with all windows slightly open, when measured and/ or calculated and plotted on a rating curve chart.

Reason - In the interests of public health and to prevent noise pollution.

12. The agreed construction traffic management scheme (CTMS) in association with planning permission 18/02139/FLM (drawing numbers 18/02139/50 and

18/02139/51) shall be adhered to during the entire site construction programme.

Reason - In the interests of pedestrian and traffic safety and in the interests of free traffic flow.

13. In line with planning permission 18/02139/FLM, the accesses at Angus Road and Stormont Road shall be upgraded to the satisfaction of the Council as Roads Authority and footpath links, including dropped kerbs shall be provided at both accesses in accordance with the standards required by the Council as Roads Authority.

Reason - In the interest of pedestrian and cycle safety.

14. The agreed sustainable urban drainage system (SUDS) in association with 18/02139/FLM (drawing number 18/02139/52) shall be implemented and all works operational prior to the bringing into use of the development.

Reason - For clarity and in order to ensure that surface water arising from the development is adequately dealt with and that any sustainable urban drainage system (SUDS) does not increase flood risk elsewhere.

#### **B** JUSTIFICATION

The proposal is in accordance with the Development Plan and there are no material reasons which justify departing from the Development Plan.

#### C PROCEDURAL NOTES

61 None.

#### **D** INFORMATIVES

- 1. This planning permission will last only for three years from the date of this decision notice, unless the development has been started within that period (see section 58(1) of the Town and Country Planning (Scotland) Act 1997 (as amended)).
- 2. Under section 27A of the Town and Country Planning (Scotland) Act 1997 (as amended) the person undertaking the development is required to give the Planning Authority prior written notification of the date on which it is intended to commence the development. A failure to comply with this statutory requirement would constitute a breach of planning control under section 123(1) of that Act, which may result in enforcement action being taken.
- 3. As soon as practicable after the development is complete, the person who completes the development is obliged by section 27B of the Town and Country Planning (Scotland) Act 1997 (as amended) to give the Planning Authority written notice of that position.

- 4. This development will require the 'Display of notice while development is carried out', under Section 27C (1) of the Town and Country Planning Act 1997, as amended, and Regulation 41 of the Development Management Procedure (Scotland) Regulations 2013. The form of the notice is set out in Schedule 7 of the Regulations and a draft notice is included for your guidance. According to Regulation 41 the notice must be:
  - Displayed in a prominent place at or in the vicinity of the site of the development;
  - Readily visible to the public; and
  - Printed on durable material.
- 5. No work shall be commenced until an application for building warrant has been submitted and approved.
- 6. The applicant is reminded that, should any protected species be present a licence may be required from Scottish Natural Heritage to disturb a protected species. Failure to obtain a licence may constitute a criminal act under the Habitats Regulations and penalties are severe for non-compliance.
- 7. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended, it is an offence to remove, damage or destroy the nest of any wild birds while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act.
- 8. Swift brick installation should proceed in accordance with Swift Conservation guidance available from swift-conservation.org. Installation of lighting and bat boxes should proceed in accordance with Bat Conservation Trust guidance.
- 9. The applicant is advised to refer to Perth & Kinross Council's Supplementary Guidance on Flood Risk and Flood Risk Assessments 2021 as it contains advice relevant to your development.
- 10. The applicant is advised that in terms of Sections 56 of the Roads (Scotland) Act 1984 he/she/they must obtain from the Council, as Roads Authority, consent to open an existing road or footway prior to the commencement of works. Information on junction types, requirements for Vehicular Access consents (VA1) and application forms are available at www.pkc.gov.uk/vehicleaccess. Advice on the disposal of surface water should be sought at the initial stages of design from Scottish Water and the Scottish Environment Protection Agency.
- 11. The applicant is advised to allow for a maximum of 10 linear metres of level hard standing from bin storage or presentation point to refuse collection vehicle to reduce manual handling for bin collection crews.
- 12. The applicant is recommended to discuss potential options with the Council's Waste Services team (Tel: 01738 475000) for securing an onsite glass recycling point for the benefit of the development.

Background Papers: 3 letters of representation

Contact Officer: Gillian Peebles Date: 29 July 2022

# DAVID LITTLEJOHN HEAD OF PLANNING & DEVELOPMENT

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