## Perth and Kinross Council

# Planning & Development Management Committee – 13 March 2019 Report of Handling by Interim Development Quality Manager (Report No. 19/73)

**PROPOSAL:** Change of use from agricultural land to form extension to car park

**LOCATION:** Meikleour Arms Hotel and Restaurant, Meikleour, Perth, PH2 6EB

Ref. No: <u>18/02168/FLL</u> Ward No: P5 - Strathtay

## **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 is for the change of use from agricultural land to form an extension to an existing car park at the Meikleour Arms Hotel and Restaurant in Meikleour.
- The Meikleour Arms is category B listed building and is located within the Meikleour Conservation Area. It was recently extended to accommodate a new kitchen and restaurant with associated store, toilets and a boiler room, applications 15/00067/FLL and 15/00068/LBC refer.
- The applicant has submitted a supporting statement. This confirms the works undertaken as part of the 2015 permission has seen an increase in customers to the hotel and restaurant. The applicant is looking to ensure these customers are accommodated within their car park instead of elsewhere in the village. They are also looking to improve traffic safety as customers utilising the parking area in front of Meikleour Arms on occasion have to reverse onto the A984.
- The car parking extension will be surfaced with stone chips to match the existing and incorporate a central island in the car park with planting. A cypress tree and a bush are proposed to be removed with all other boundary planting retained and supplemented.

#### **NATIONAL POLICY AND GUIDANCE**

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**

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. Under the Planning etc. (Scotland) Act 2006 this is now a statutory document and material consideration in any planning application. The document 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.

## **Scottish Planning Policy 2014**

- The Scottish Planning Policy (SPP) was published in June 2014 and 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 75 Planning for Transport

## **Creating Places 2013**

10 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.

## **National Roads Development Guide 2014**

11 This document supports Designing Streets and expands on its principles and is considered to be the technical advice that should be followed in designing and approving of all streets including parking provision.

#### **DEVELOPMENT PLAN**

The Development Plan for the area comprises the TAYplan Strategic Development Plan 2016-2036 and the Perth and Kinross Local Development Plan 2014.

## TAYPlan Strategic Development Plan 2016-2036

- 13 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."
- The following sections of the TAYplan 2016 are of particular importance in the assessment of this application.

# **Policy 9: Managing TAYplans Assets**

Seeks to ensure responsible management of TAYplan's assets by: using the locational priorities of the Plan to identify and protect finite resources (mineral deposits and important soils); Protecting Natura 2000 sites; and safeguarding the integrity of natural and historic assets including habitats, wild land, sensitive green spaces, forestry, water environment, wetlands, floodplains (inline with the Water Framework Directive), carbon sinks, species and wildlife corridors, and also geo-diversity, landscapes, parks, townscapes, archaeology, historic battlefields, historic buildings and monuments and by allowing development where it does not adversely impact upon or preferably enhances these assets.

## Perth and Kinross Local Development Plan 2014

- The Local Development Plan (LDP) was adopted by Perth and Kinross Council on 3 February 2014. The LDP 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.
- 18 The principal relevant policies are, in summary;

# Policy PM1A - Placemaking

Development must contribute positively to the quality of the surrounding built and natural environment, respecting the character and amenity of the place. All development should be planned and designed with reference to climate change mitigation and adaption.

# Policy PM1B - Placemaking

20 All proposals should meet all eight of the placemaking criteria.

## **Policy PM4 - Settlement Boundaries**

21 For settlements which are defined by a settlement boundary in the Plan, development will not be permitted, except within the defined settlement boundary.

## Policy TA1B - Transport Standards and Accessibility Requirements

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. Supplementary Guidance will set out when a travel plan and transport assessment is required.

# **Policy HE1A - Scheduled Monuments**

There is a presumption against development which would have an adverse effect on the integrity of a Scheduled Monument and its setting, unless there are exceptional circumstances.

# Policy HE1B - Non Designated Archaeology

Areas or sites of known archaeological interest and their settings will be protected and there will be a strong presumption in favour of preservation in situ. If not possible provision will be required for survey, excavation, recording and analysis.

# **Policy HE2 - Listed Buildings**

There is a presumption in favour of the retention and sympathetic restoration, correct maintenance and sensitive management of listed buildings to enable them to remain in active use. The layout, design, materials, scale, siting and use of any development which will affect a listed building or its setting should be appropriate to the building's character, appearance and setting.

# **Policy ER5 - Prime Agricultural Land**

Development on prime agricultural land will not be permitted unless it is necessary to meet a specific established need such as a major infrastructure proposal, there is no other suitable site available on non-prime land or it is small scale development (generally single buildings) linked to rural business.

# Policy ER6 - Managing Future Landscape -Change to Conserve and Enhance the Diversity and Quality of the Area's Landscapes

27 Development proposals will be supported where they do not conflict with the aim of maintaining and enhancing the landscape qualities of Perth and Kinross and they meet the tests set out in the 7 criteria.

# Proposed Perth and Kinross Local Development Plan 2 (LDP2)

- Perth & Kinross Council is progressing with preparation of a new Local Development Plan to provide up-to-date Development Plan coverage for Perth & Kinross. When adopted, the Perth & Kinross Local Development Plan 2 (LDP2) will replace the current adopted Perth & Kinross Local Development Plan (LDP). The Proposed Local Development Plan 2 (LDP2) was approved at the Special Council meeting on 22 November 2017.
- The representations received on the Proposed LDP2 and the Council's responses to these were considered at the Special Council meeting on 29 August 2018. The unresolved representation to the Proposed Plan after this period is likely to be considered at an Examination by independent Reporter(s) appointed by the Scottish Ministers, later this year. The Reporter(s) will thereafter present their conclusions and recommendations on the plan, which the Council must accept prior to adoption. It is only in exceptional circumstances that the Council can elect not to do this.
- The Proposed LDP2 represents Perth & Kinross Council's settled view in relation to land use planning and as such it is a material consideration in the determination of planning applications. It sets out a clear, long-term vision and planning policies for Perth & Kinross to meet the development needs of the area up to 2028 and beyond. The Proposed LDP2 is considered consistent with the Strategic Development Plan (TAYplan) and Scottish Planning Policy (SPP) 2014. However, the outcome of the Examination could potentially result in modifications to the Plan. As such, currently limited weight can be given to its content where subject of a representation, and the policies and proposals of the plan are only referred to where they would materially alter the recommendation or decision.

# **SITE HISTORY**

- 31 <u>03/00287/PPLB</u> Installation of kitchen extractor flue and formation of internal doorway at Decision Issued 7 May 2003 Application Permitted under delegated powers.
- 32 <u>03/00714/FUL</u> Erection of LPG tank with two-sided screen Decision Issued 6 June 2003 Application Permitted under delegated powers.
- 33 <u>13/02000/FLL</u> Demolition of outbuildings, alterations and extension to the hotel and erection of a biomass boiler house and store Decision Issued 2 December 2013 Application Refused under delegated powers.
- 34 <u>13/02003/LBC</u> Demolition of outbuildings, alterations and extension to the hotel and erection of a boiler house and store Decision Issued 2 December 2013 Application Refused under delegated powers.
- 35 <u>14/00488/FLL</u> Demolition of outbuildings, alterations and extension to the hotel and erection of a biomass boiler house and store Decision Issued 15 May 2014 Application Refused under delegated powers.

- 36 <u>14/00489/LBC</u> Demolition of outbuildings, alterations and extension to the hotel and erection of a biomass boiler house and store Decision Issued 15 May 2014 Application Refused under delegated powers and appeal dismissed by DPEA, LBA/340/2014
- 37 <u>15/00067/FLL</u> Alteration and extension, demolition of outbuildings at hotel Decision Issued 05 March 2015 Application Permitted under delegated powers.
- 38 <u>15/00068/LBC</u> Alterations and extension, demolition of outbuildings at hotel Decision Issued 23 April 2015 Application Permitted under delegated powers.

#### CONSULTATIONS

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

#### **External**

## **Perth and Kinross Heritage Trust**

40 No objection subject to an archaeological evaluation being undertaken to assess the presence/absence, character and significance of archaeological deposits on the site.

#### Internal

# **Transport Planning**

41 No objection.

#### REPRESENTATIONS

- The following points were raised in the six representation received:
  - Impact on village boundary.
  - Impact on Conservation Area.
  - No consent for existing car park.
  - No need for additional spaces it is excessive/car park is not full.
  - Existing car parks should be resurfaced and incorporate lines to ensure proper management.
  - Amendments should be made to the car park at the front of the hotel.
  - Granting the consent could lead to an alternative use in the future.
  - Anti-social behaviour/noise from patrons leaving the car park.
- These issues are addressed in the Appraisal section of the report.

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Environment Statement	Not Required
Screening Opinion	Not Required
Environmental Impact Assessment	Not Required
Appropriate Assessment	Not Required
Design Statement / Design and Access Statement	Not Required
Reports on Impact or Potential Impact	Not Required

#### **APPRAISAL**

- 45 Sections 25 and 37(2) of the Town & Country Planning (Scotland) Act 1997 (as amended) require the determination of the proposal to be made in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. The adopted Development Plan comprises the TAYplan Strategic Development Plan 2016–2036 and the Perth and Kinross Local Development Plan 2014. The relevant policies are outlined in the policy section above and are considered in more detail below.
- Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 is applicable due to the potential impact the development may have on the adjacent Listed Buildings.
- In addition, section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 is pertinent which requires the Planning Authority to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.
- The key determining issues are whether the proposal is consistent with the relevant provisions of the Development Plan, whether there are any factors that would justify a potential departure from the Development Plan, whether the setting of listed buildings is preserved and how the development relates to the character or appearance of a Conservation Area.

## **Principle**

- The planning considerations involved with extensions to existing rural pub car parks vary depending on the context of the site and its relationship with the landscape.
- Such developments may be viewed as desirable in order to rid surrounding streets of parking, thus reducing amenity problems and traffic hazards. While on the other hand the concentration of activity and vehicle movements that a car park would imply may well be seen as undesirable with an adverse impact on the character of the rural area.

For reasons set out under the headings below the development is considered to comply with the over-riding thrust of the development plan and the proposal should be supported.

## **Land Use**

- Letters of representation question whether the existing car park to be extended has a lawful consent. There is consent for the car park under application 15/00067/FLL when planning permission was granted for alteration and extension of the Hotel and the demolition of outbuildings.
- Further land use concerns have also been raised as the site constitutes agricultural land and it falls out with the settlement boundary of Meikleour.
- TAYPlan Policy 9 and LDP Policy ER5 recognise the importance of prime agricultural land. In this case the site has a land capability of 3.1. This constitutes prime agricultural land with a capability of growing a moderate range of crops.
- Development is directed away from prime agricultural land under policy ER5 however there is an allowance for small scale development directly linked to a rural business providing it is compatible with all other aspects of the policy framework of the plan and there are no other non-prime land sites available. In this case Meikleour is surrounded by prime agricultural land. I do not consider that there is any alternative non-prime agricultural land that could be used. I also note that the use of the car park is inextricably interlinked with the rural hotel and restaurant business and the car parks proximity to the existing rural business is of importance.
- While the site is outwith the settlement boundary of the village, the extension to the existing car park will not be detrimental to the setting of the Meikleour and this would be further reduced if an appropriate landscaping scheme is secured to enhance the boundary definition (Condition 4).
- Taking the above into account, I do not consider that the proposed car park extension conflicts with TAYPlan Policy 9 or LDP Policy ER5, while the conflict with LDP Policy PM4 would not justify refusal of the application. I note concerns are also raised regarding potential alternative uses in the future however any change of use or alternative development would be subject of a further application and assessment against the Local Development Plan at that time.

#### **Roads and Access**

- Policy TA1B of the LDP is concerned with providing safe access and appropriate car parking.
- The applicant's supporting statement confirms that the car park extension is required to cater for an increased demand since the redevelopment of the Hotel and to improve road safety. There are currently three car parking areas associated with the Meikleour Arms Hotel and Restaurant.

- The first is a gravelled car park to the north of the hotel. A second area consisting of a bound surface is located to the south east at the pub entrance, while a third car park surfaced in gravel, which is subject to this extension application, is accessed from Carsie Road to the south east.
- In relation to the road geometry of the A984, the first and second car parks have restricted visibility splays and mirrors have been erected on the opposite side of the road to assist access and egress. The park area in front of the Meikleour Arms is constrained; I consider it would be particularly difficult to manoeuvre a car in a way that would allow safe access and egress to and from this area in a forward gear when other cars are parked in this location. It is therefore understandable that the applicant is looking to direct patrons away from this area as vehicles would inevitably end up reversing onto the A984 with restricted visibility.
- The proposed car park to be extended is the third car park area. This has the best visibility splays at the junction/access with Carsie Road and the A984. The layout also has the ability to easily accommodate access and egress in a forward gear. I consider the extension of this car park in combination with the restricted use of the second car park area has the ability to significantly improve road traffic safety. To ensure this benefit occurs a strategy is required to ensure the second car park area is discontinued and patrons are directed away from parking in this area (Condition 3).
- Representations have questioned the need for the parking extension and have highlighted that improvements to the existing car parking management could be made in the form of resurfacing and delineated lines setting out car parking spaces. While the application of this form of urban parking management could increase the efficiency of the existing car parks, in my view it would have a detrimental impact on the rural character of Meikleour. The proposed extension to the gravel parking area with planting is a better design solution, especially when taking account of the proximity to the listed building and the sites location within a Conservation Area.
- The application form highlights that the overall car parking spaces to be created for the Meikleour Arms will be some 45 spaces in total. From my review of the parking areas as well as the extension and the discontinuance of the second car park area I consider the extent of car parking will likely be more than the 45 spaces quoted. The National Roads Development Guide sets out parking standards for use classes, taking account of the number of rooms and the floor space associated with the pub and restaurant this equates to some 71 car parking spaces in this instance.
- While there are no delineated car parking spaces shown on the plan I am of the view that the provision of the additional parking and associated turning area is appropriate and will be more in line with the standards required by the National Roads Development Guide. It will also provide some flexibility in terms of the vehicles that can utilise the parking area. Transport Planning have also been consulted on the application and they offer no objection to the application on road safety grounds or the parking provision. Overall the proposal is considered to comply with Policy TA1B.

#### **Conservation Considerations**

## Setting of Listed Building

- Section 59 of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 is applicable due to the potential impact the development may have on the adjacent Listed Buildings. The proposed car park extension is not considered to affect the setting of the listed building due to the distance between the car park as well as the intervening landscape planting that will be retained as part of this application.
- The requirement to discontinue the car parking area to the front of the pub entrance will mean that vehicles will not obscure this elevation of the listed building and this will have a positive impact on the setting of the listed building. The setting could be further improved depending on the strategy deployed by the applicant under condition (Condition 3).
- As such it is considered that the proposed development will not conflict with the setting criterion within Policy HE2 of the LDP or Policy 9 Tayplan.

# Impact on Conservation Area

- Section 64(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997 is also pertinent which requires the Planning Authority to pay special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.
- The proposed car park extension is not considered to have a detrimental impact on the Conservation Area if landscaping is deployed to the existing open boundary. As such there is no conflict with the criterion within Policy HE3B of the LDP with the implementation of a suitable landscape scheme (Condition 4).

## **Archaeology**

- 71 Due to the proximity of Scheduled Ancient Monuments Policy HE1A is engaged.
- The closest scheduled monument to the development site is located 265m east that comprises of two enclosures of prehistoric date, visible as a series of cropmarks on oblique aerial photographs (MPK3265, SM7027). This nationally protected monument and its close location to the Cleaven Dyke (SM1602) has been interpreted as a possible mortuary enclosure also of Neolithic date.
- With the incorporation of landscaping on the west boundary the proposal is not considered to have an adverse impact on the setting of the scheduled Ancient Monument. As such there is no conflict with Policy HE1A of the LDP or Policy 9 of Tayplan.
- Consultation has also been undertaken with Perth and Kinross Heritage Trust (PKHT) as there are two further enclosures from aerial photography adjacent

to MPK3265 which appears to be two oval enclosures measuring about 50m from ENE to WSW by 40m internally (MPK6060). PKHT confirm there is little archaeological evaluation work undertaken in or around the village therefore the level of survival of archaeology is unknown. As such PKHT advise that an archaeological evaluation should be undertaken on the new car park foot print to determine any survival of archaeological remains. Subject to an appropriate condition being imposed on the permission, the application is considered to comply with Policy HE1B and Policy 9 of Tayplan (Condition 2).

# Landscape

- Development and land use change should be compatible with the distinctive characteristics and features of Perth & Kinross's landscape. Development proposals will be supported where they do not conflict with the aim of maintaining and enhancing the landscape qualities of Perth and Kinross.
- With the incorporation of a suitable landscape scheme as required by condition 4 the proposal is not considered to conflict with the landscape aims of Policy ER6.

# **Residential Amenity**

- I acknowledged the concerns of residents regarding the potential behavior of patrons particularly in terms of rowdiness or loud noise. However the proposed extension to the car park will not necessarily result in an increase in noise or rowdiness. If issues do arise I consider this can be addressed satisfactorily through the use of powers under the Environmental Protection Act 1990.
- The concerns about the potential use of the car park for anti-social behavior are noted. However these issues are not a planning matter and would be best addressed through the use of police powers should concerns arise in future.

## **Developer Contributions**

79 The developer contributions policy is not applicable to this proposal.

## **Economic Impact**

The proposal is not considered to have a significant economic impact however the provision of improved car parking and access arrangements at the site will assist the continued successful operation of the existing hotel and restaurant.

#### **LEGAL AGREEMENTS**

81 None

#### **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. In this respect, I have taken account of the Local Development Plan and material considerations and in this case I am content that the development proposed does not conflict with the Development Plan.
- Accordingly the proposal is recommended for approval subject to the following conditions.

## RECOMMENDATION

# Approve the application

#### Conditions and Reasons for Recommendation

- 1. 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. Development shall not commence until the developer has secured the implementation of a programme of archaeological work in accordance with a written scheme of archaeological investigation which has been submitted by the applicant, and agreed in writing by the Council as Planning Authority, in consultation with Perth and Kinross Heritage Trust. Thereafter, the developer shall ensure that the programme of archaeological works is fully implemented including that all excavation, preservation, recording, recovery, analysis, publication and archiving of archaeological resources within the development site is undertaken. In addition, the developer shall afford access at all reasonable times to Perth and Kinross Heritage Trust or a nominated representative and shall allow them to observe work in progress.

Reason - To ensure a programme of archaeological works is carried out to safeguard and record any archaeological remains within the development area.

3. Prior to the commencement of development hereby approved a strategy to restrict car parking directly in front of the Meikleour Arms Hotel and Restaurant (to the south east) shall be submitted for the further written agreement of the Council as Planning Authority. Thereafter the strategy as subsequently approved shall be implemented and maintained before the car park extension is brought into use.

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

4. Prior to the commencement of the development hereby approved, a detailed landscaping and planting scheme for the site shall be submitted for the further written agreement of the Council as Planning Authority. The scheme shall include details of the height and slopes of any mounding or recontouring of the site, full details of all hard landscaping proposals including materials and installation methods and, species, height, size and density of trees and shrubs to be planted. The scheme as subsequently approved 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.

Any planting failing to become established within five years shall be replaced in the following planting season with others of similar size, species and number.

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

#### **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

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. Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning permission for a development does not provide a defence against prosecution under this Act.
- 5. The applicant is advised that to enable the negative suspensive condition to be fulfilled (the car park strategy directly in front of the Meikleour Arms Hotel and Restaurant to the south east) may, depending on the strategy to be deployed, constitute operational development and these works themselves may require the submission of a planning application.

Background Papers: 6 letters of representation Contact Officer: John Russell 01738 475346

Date: 28 February 2019

# ANNE CONDLIFFE INTERIM DEVELOPMENT QUALITY MANAGER

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