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2nd March 2018

Dear Mr Khan

London Borough of Bromley Representation to The London Plan Draft for Public Consultation – December 2017

Bromley Council's Executive of 7th February 2018 authorised the Chief Planner, in consultation with the Leader, be to prepare and submit the Council's response to the London Plan consultation to the Mayor of London by 2nd March 2018. This is now set out below and the full report is attached. Together, this is the Council's response. There are a number of fundamental aspects of the draft London Plan that the Council **strongly objects** to, notably

- the increase in housing targets, based on the principle of intensification, from 641 to 1,424 units per annum (one of the highest percentage increases in London);
- the significant reliance on small sites to meet 72% of the overall housing target (Table 9.5 of the SHLAA 2017) and the methodology employed to produce that figure;
- the apparent failure to comply with the Duty to Co-operate in particular with Councils outside Greater London as there is no obvious housing provision in the Wider South East towards London's needs, despite the contents of the 2014 London Plan Inspector's report;
- the removal of the presumption against development on garden land;
- affordable housing thresholds rising to 50% in some cases; and
- less flexibility on parking standards.

The main elements of Bromley Council's comments are summarised below. The full report as approved by the Executive is at Appendix One.

Chapter 1 – Planning London's Future (Good Growth Policies)

Bromley Council objects to the impact of draft London Plan policies G2 – G4, on green spaces and the suburban character of Bromley. The London Plan should give strong protection to these valued environments.

The Council **strongly supports** the reaffirmation that existing green space designations should remain protected. As a borough with more than 50% open space, Bromley has a key role to play in the achievement of the ambition of 50% green cover across London (para 1.2.6).

Chapter 2 – Spatial Development Patterns

Strategic Framework

Bromley supports the recognition of the value of open spaces and the focus on previously developed land. However, **Bromley objects to the failure to recognise that** there is limited capacity for intensification of suburban areas without detrimental effects upon local communities, heritage, character and green infrastructure. It could also lead to a loss of much needed family housing and necessary amenity space for residents, particularly children. Intensification in areas without high levels of public transport would lead to additional pressure on the road network. This strategy does not accord with Para 1.2.7 which recognises the benefits of "distinctive character and heritage".

Supporting London's Growth

The Council objects to the deletion of the DLR extension to Bromley from TfL's current Business Plan, it remains Bromley's preferred option from Lewisham/Catford to Bromley South via Bromley North. This extension will form part of continuing discussions with TfL regarding the next draft of the Business Plan, and the Council will continue to press TfL to secure funding for this extension. See also representation on Policy T3, Chapter 10.

The "Wider South East" (WSE)

Policy SD2 – Collaboration in the Wider South East
Policy SD3 – Growth Locations in the Wider South East and Beyond

With the risks to existing communities and the environment of accommodating of an ever-growing population within the bounds of the Capital, Bromley Council **strongly objects** to the apparent failure to comply with the Duty to Co-operate in particular with Councils outside Greater London where there is no obvious housing provision towards London's needs, despite the prompts of the 2014 London Plan Inspector's report. This is in spite of the clear steer from the Report into the Further Alterations to the London Plan (FALP) para 57 where the Inspector advised
"*In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local*

planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city."

The Council raises concerns regarding the Duty to Co-operate with the Wider South East (WSE) and objects to the failure of the draft London Plan to effectively seek 'shared solutions to the barriers to housing delivery' as indicated in draft London Plan Policy SD2E.

The 2014 Report into the FALP examined the various approaches proposed by the Mayor to address the housing need but cautioned that
'the strategy has significant and potentially serious implications for delivery and for existing communities which will have to face the consequences of intensifying development in the existing built up area.'

The London Plan evidence base indicates summits with the Wider South East in attempts to seek less damaging housing delivery in the WSE, however, these have not led to effective results.

At the December 2016 (third summit) the minutes note '*The need for a more honest discussion about whether (or not) London can meet its own growth, and an explicit recognition by the Mayor that the South East has, and East of England have to accommodate their own growth pressures'.*

This engagement did not result in any proposals for the need in London to be addressed across the WSE and at the January 2018 (fourth summit) the discussion had shifted to '*the potential for London Boroughs to be more actively engaged in the work of the political steering group, given their role in helping the Mayor deliver against housing targets.*'

Policy SD6 – Town Centres

The continued focus on town centres for multiple uses is supported however it is important to recognise that not all town centres can accommodate higher density development without irrevocably changing their character. Boroughs should be able to determine which town centres are suitable for higher density development rather than there being a blanket assumption.
The residential conversions of retail and commercial frontages can have detrimental impact on high streets and the operation of Business Improvement Districts (BIDs). **Bromley objects to** Clause C of the policy which is not robust enough in this respect.

Policy SD7 – Town Centre Network

The Council **objects** to Policy SD7 clause G 1) and Annex A1.3 which indicates 'medium residential growth potential' for Petts Wood and West Wickham district centres. This 'medium' potential for residential growth is the same as indicated for Orpington which is a 'major' centre. This 'one size fits all' approach to residential growth should not apply in conservation areas or where additional residential development will negatively impact the character of an area. Petts Wood has very limited potential for residential growth with much of the surrounding roads designated

as an 'Area of Special Residential Character' (ASRC). Under this ASRC designation development proposals will be required to respect, enhance and strengthen the special and distinctive qualities of the area.

The "high" potential for residential and commercial growth in Bromley Town Centre is noted. This reflects the area's status as an Opportunity Area.

Policy SD8 – Town Centres: development principles and Development Plan Documents

The sequential approach to town centre uses is supported, **however, Bromley objects to** the introduction of residential development into out-of-centre retail and leisure parks due to the less accessible nature of these areas and their parking pressures.

Policy SD9 – Town centres: Local partnerships and implementation

With 7 potential town centres which would require Town Centre Strategies, there is concern about the resource implications of this requirement in Bromley. **Bromley objects to this blanket approach** and it is suggested that boroughs should be allowed to decide which town centres will benefit from this approach.

Chapter 3 – Design

Policy D1 – London's form and characteristics

Whilst the policy is generally supported there are **objections** relating to the understanding of 'optimising density' as outlined in Policy D6 below.

Policy D4 – Housing quality and standards

Bromley strongly objects to the deletion of an important element of Policy 3.5 – that is the presumption against development on back gardens or other private residential gardens. Gardens have been completely missed from the Consultation Draft Plan and do not even feature in the Green Infrastructure section. These spaces should be recognised and protected for their contribution to amenity, healthy lifestyles, biodiversity and habitat corridors, flood risk management, heritage and character.

The Council supports minimum dwelling size standards in principle but remains concerned that is not possible to apply this policy to conversions made under Prior Approval (particularly office to residential). Some residential units coming forward under the Government's scheme are well below the London Plan standard.

Policy D6 – Optimising Housing Density

The Council supports a design-led approach to development sites **but objects to the inference in** Para 3.6.1 that this approach will necessarily result in higher densities. Taking the local context and character into account, as required by other draft policies, may not lead to higher density development being the optimal solution.

Whilst Policy D6 references Policies D4 and D2 it does not reference Policy D1 which relates to the need for designs to respond to the local context. Policy D6 should therefore be strengthened in terms of the need for designs to respond to context and character and cross referenced to Policy D1 B.

Chapter 4 Housing

Policy H1 Increasing housing supply

The Council strongly objects to the increase in the housing target which is significantly more than double the existing target, as Fig 9.6 of the SHLAA indicates (a 122% increase over and above the existing target) The Council also objects to the reliance so significantly on small sites development and to the methodology used to derive the figure. (see response to small sites Policy H2) . The Council objects to the omission of a cross reference to Policy GG2(D) to make it clear that H1(B) is subject to GG2(D) restrictions on Green Belt, MOL etc. similar to NPPF paragraph 14.

Whilst the London Plan (2016) identifies 6410 units over the ten year plan period, Table 4.1 of the 2017 Draft London Plan indicates 14,240 over the ten year period.

The Council objects to the 677 unit per annum uplift for small sites. Paragraph 4.1.3 of the draft London Plan refers to a fundamental transformation that is required to deliver this significant step change in delivery.

Through participation in the London-wide SHLAA officers assessed sites of 0.25 ha or larger. This exercise resulted in realistic assumptions for sites of this size depending on a variety of site characteristics. All sites that are currently designated as Green Belt, Metropolitan Open Land and Urban Open Space were excluded (unless an extant planning permission existed for the site). Paragraph 4.1.7 states that the differences between different borough targets are a reflection of the variations in the constraints and opportunities affecting development on large sites and the capacity for development on small sites.

The Council **strongly objects** to the methodology used by the GLA to generate the small site target for boroughs which differs to that used in the 2013 SHLAA. The methodology uses a combination of trend data for certain types of development and an estimate of potential intensification in existing residential areas (paragraph 4.1.7). The small site 'target' for the borough has increased dramatically as a result of the revised methodology.

The phasing of large sites in the 2017 SHLAA (Appendix E) is based on when sites may be completed. It is considered that this does not adequately reflect the phasing submitted to the GLA by officers and is misleading compared to borough documents that include housing trajectories. It would be beneficial for the evidence to include the general phasing of whole sites to give a more detailed account of delivery on large sites.

Additionally Bromley objects to the tight timescale for commencement of such a step change in delivery.

See also below Council's response to Policy H2.

Policy H2 Small sites (<0.25ha)

The Council **strongly objects** to the proposed policy direction and methodology for sites of less than 0.25ha (or sites for 1-25 homes) linked to the objections to Policy H1, based on the 2017 GLA SHLAA methodology as referred to in paragraph 4.2.4 of the Draft London Plan. The policy approach results in the Borough's small site target increasing by 677 per annum from 352 units per annum to 1029 units per annum. The reasons are expanded upon below.

Small sites are more difficult to plan for in terms of their impact on social infrastructure and are also less likely to make a contribution to new social infrastructure.

The Inspectors report (para 55) into the Further Alterations to the London Plan (FALP) noted that the Mayor's population and household projections 2013 SHMA and SHLAA were based on good evidence and robust methodology. The previous methodology used in was based on past trends of completions on sites of less than 0.25ha over an eight year period. During the most recent SHLAA process boroughs were not consulted about the significant changes proposed as set out in the 2017 SHLAA evidence that have resulted in a three-fold increase of the figure for Bromley.

This methodology was instead developed after the SHLAA consultation, with the stated intention of sharing with boroughs at a later date for comment. The detail was not shared until the targets were announced late in r 2017 and therefore this consultation on the London Plan represents the only opportunity for Councils to provide feedback about the deliverability of the small sites targets. The Council's clear feedback it that this is an unrealistic target unsupported by evidence that it is achievable without setting aside other objectives of the London Plan and the principles of sustainable development set out in the NPPF.

Additionally this is no longer a housing supply monitoring target, but target for net housing completions. This makes Local Councils vulnerable to challenge for failure to meet targets that are outside their control. Whilst 'supply' relates to the deliverability of targets (the delivery and lapsing of individual sites), completions does not take into account of deliverability and therefore requires a further increase in development to make up for any lapse of permissions, outside the local authorities control.

The GLA small sites methodology assumes a 1% of the existing stock of houses will increase in density in areas which benefit from PTALs of 3 to 6 or area within 800m of a railway station or tube station or a town centre.

This simplistic approach fails to recognise the variation in accessibility provided by Central London tube stations and outer suburban rail stations (for example Chelsfield station with 4 - 6 trains hourly of which 2 – 3 to London). This variation in accessibility significantly affects the viability and realistic delivery of the theoretical level of development proposed by the London Plan.

Growth factors are then applied to the notional 1% - a factor of 3.23 to semi-detached and detached houses and a factor of 2.34 to terrace houses. Whilst justification on the basis of trend data is provided for the growth factors, there is no justification provided for the initial 1% figure – this is simply a 'policy on' assumption with no evidential basis that such increases in density are viable or achievable without significantly undermining other objectives of the London Plan and indeed adopted and draft Local Plans.

For example, Bromley's adopted UDP (Policy H10) and draft Local Plan (draft Policy 44) designate 'Areas of Special Residential Character'. The requirements of these designations, relating to respecting, complementing and, with regard to the draft Local Plan, enhancing the qualities of the areas, will involve the careful design of development proposals and should be factored into any assumed densities.

The lack of evidence undermines the realistic deliverability of the London Plan targets and the inevitable conflict between housing targets and the requirements of sustainable development will be likely to result in a significant increase in planning by appeal.

The reduction to 0.25% in conservation areas is noted, however, again there is no evidential basis to validate this figure.

Reference is made to the need for design codes but no advice is given in the supporting text on the status of such codes. Where a design code is not in place the presumption is in favour of approving small housing development unless there is an unacceptable level of harm to residential privacy, heritage assets, biodiversity or a safeguarded land use.

Other relevant policies in the Plan (including design policies) should be reflected in Clause E to ensure that future development on small sites respects its surroundings and does not adversely impact upon the residential amenity of existing and future occupiers.

Clause D, 2) d) specifies that one of the types of small housing development could be the infill development within the curtilage of a house. This could include the development of backland or garden land to which the Council strongly objects. See also comments in relation to Draft Policy D4 and the lack of reference in the consultation Draft Plan to any presumption against backland / private garden development in borough local plans.

The National Planning Policy Framework (NPPF) suggests that '*Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area' (para 53);* clarifies that private residential gardens do not constitute previously developed land and advises in para 48 that they should not form part of windfall allowance in the five-year supply.

Small site development should be assessed in relation to: the impact on character, appearance and context of an area, no unacceptable loss of landscaping, natural

habitats, play space or amenity space and no adverse impact upon the residential amenity of future or existing occupiers. If a design code is not in place the criteria set out in clause E would not cover the latter aspects and could give rise to an unacceptable level of harm to residential privacy.

Clause H refers to boroughs seeking affordable housing contributions on sites of 10 units or less. Reference should be made to whether or not this is a viable option for boroughs within the supporting text.

Policy H3 Monitoring housing targets

The Council strongly objects to the uplift in the Borough's housing target as set out above and to the Policy H3 Monitoring Housing Targets.

A new policy relating to the monitoring of targets and support from the Mayor for boroughs is supported in principle. Of importance though is how the potential significant uplift in the housing target for the borough could impact upon the Council's five year housing land supply position in the early years following adoption of the Draft London Plan. Clarifications on the role of 'windfalls' and other London factors applying to London's Housing Land supply in the London Plan 2016 text supporting Policy 3.3 have been lost and should be reinstated.

As drafted the supporting text does not adequately provide enough guidance to boroughs on how a five year housing land supply could be calculated taking into account the significant uplift in small site targets.

It is acknowledged in paragraph 4.3.3 that the increased small site targets will take time to be delivered. It is therefore considered inappropriate and unrealistic for boroughs to be monitored against these targets until there is more certainty over the methodology that has calculated them and if housing delivery will occur along the lines envisaged in the 2017 SHLAA.

Policy H5 Delivering affordable housing

The Council **strongly objects** to the proposed 50% affordable housing target applicable across a range of sites. The seeking of such a high proportion of affordable housing will be undermined by viability issues, deter development and prevent homes being built.

The Council notes the overall approach in aiming to deliver an increased level of affordable housing across London, especially if grant is made available for relevant schemes / providers listed in the policy. This is crucial in light of schemes needing to demonstrate that they have sought to increase the level of affordable housing beyond the level that would otherwise be provided. Reference to the levels of funding likely to be made available or relevant programmes should be included within the supporting text of the policy.

There is some uncertainty though whether the fast-track route will incentivise developers not to enter into the viability tested route which could result in the planning process not being sped up.

Additional guidance is required in relation to off-site and cash-in-lieu circumstances.

Policy H6 Threshold approach to applications

The Council **objects** to Policy H6.

Clause D should make reference to the need for details of the Early Stage Review to be set out in a S106 agreement.

Application of Clause E could increase the need to use of independent consultants to assess viability on relevant schemes depending on the split of schemes between the Fast Track Route and the Viability Tested Route.

Reference should be made in paragraph 4.6.5 that where the 50% affordable housing threshold is not proposed then schemes will be subject to viability assessments. Clarification is need in relation to the last sentence that refers to 35% being an appropriate threshold on public land where 50% is agreed with the Mayor across the whole portfolio of sites. It may be appropriate in this instance to refer to the fact that some sites could be contributing more than 50% [as opposed to at least 50%].

Paragraph 4.6.9 highlights that applications for schemes of 150 units or more must evidence that they have sought to increase levels of affordable housing. Clause C 4) also refers to grant in relation to fast tracked schemes. It is suggested that grant is also referred to within Clause E. Clarification should also be made within paragraph 4.6.9 on whether it is only schemes that are 150 units or more that should seek grant or if this is relevant to all relevant schemes.

Policy H16 Gypsy and Traveller accommodation

The Council objects to the London specific definition of Gypsies and Travellers which will artificially increase the need within London compared to neighbouring authorities outside London. By addressing this higher need the effect will be to overprovide traveller pitches within London's boundaries relative to the surrounding area. Given the land intensive nature of traveller pitches relative to other forms of residential development this relative overprovision would be contrary to the sustainable use of land and detrimental to the requirements of the London Plan to deliver housing targets.

The Bromley Traveller Accommodation Assessment (2016) was prepared to support the draft Local Plan (currently at examination), in line with "Gypsy and Traveller Accommodation Needs Assessments Guidance (2007)" and the Governments Planning definition of Gypsies and Travellers.

Subject to the findings of the Inspectors report on Bromley's draft Local Plan. The identified need in Bromley over the next 10 years can be accommodated from within the proposed Local Plan allocations.

The Council objects, as it did in 2009, to the proposed 'fall back' targets for Boroughs who have not undertaken an assessment are set within the GLA Gypsy and Traveller Accommodation Topic Paper 2017.

The targets based on the 2008 GTANA and are skewed by a formulaic approach to psychological aversion applied to travellers living in bricks and mortar. Bromley has a significant settled (bricks and mortar) traveller community and therefore the formula produces artificially high targets and does not reflect the need experienced through Council waiting lists. The Council successfully made representations on this point during the development of the London Plan 2010 when the 'mid point approach' was considered, subsequently reduced and ultimately rejected altogether.

Chapter 5 Social Infrastructure

Policy S3 Education and Childcare Facilities

The Council **raises objections** to the failure of the policy to acknowledge the difficulty of finding sites for schools, particularly in a legislative environment where the Local Authority is no longer the provider of schools. The Council notes the site requirements in section B of the policy, but considers that these site specific requirements are most appropriately assessed by the Local Council who ultimately retain the duty to ensure the provision of places.

Policy S5 Sports and Recreation Facilities

There are numerous facilities in Bromley which are within the Green Belt. The Council objects to the removal of cross references Green Belt policies.

Chapter 7 Heritage and Culture

Policy HC7 Protecting Public Houses

Bromley objects to the length of marketing (24 months) which may have a negative impact in respect of vacancies, the character of the locality and on the vitality and viability of town centres.

Chapter 8 Green Infrastructure and the Natural Environment

Policy G1: Green infrastructure

Response:
Whilst The Council supports the principle of this policy which protects open green space, it is concerned that it does not address the particular contribution of private gardens to the aim of making London 50% green.

Policy G4: Local Green and Open Space

Response:
The Council supports the principle of G4 and clause A and welcomes the protection of non-strategic open space, which would include Urban Open Space, open spaces

and private gardens. However this appears to conflict with other policies in the draft London Plan that no longer presume to protect private residential gardens which make a valuable contribution to London's open spaces.

There is concern around the wording of the consultation London Plan policy in Clause D which opens up the possibility of designated Open Space to be built upon in areas where there is no deficiency in spaces in that category.

The title of the Policy may be ambiguous as it may seem to be making reference to the Local Green Space designation as introduced in the National planning Policy Framework and included in Bromley's Draft Local Plan which clearly is not the intention of this policy.

Chapter 9 – Sustainable Infrastructure

Policy SI9 – Safeguarded waste sites

The Council objects to the blanket retention of all existing permitted sites without caveat, particularly small privately managed sites and those in the Green Belt which include inappropriate but established uses. Should a site cease operation, re-providing that capacity in a more suitable location may not be possible within the Borough boundary and it is unclear how "appropriate compensatory capacity" could realistically be achieved.

Chapter 10 - Transport

Policy T1 - Strategic Approach to Transport
Policy T3 - Transport Capacity Connectivity & Safeguarding

The Council objects to the removal of references to enhanced rail access to Bromley via an Extension of the DLR in Table 10.1 and is and TfL's current Business Plan up to 2021. The Council is intending to safeguard land and route alignments for the DLR from Catford to Bromley South via Bromley North as per Draft Local Plan Policy 36 and will continue to press TfL to secure funding for this extension.

NOTE : Bakerloo Line Extension - Supporting London's Growth (page 34)
Transport for London submitted a representation on Bromley's Draft Local Plan in December 2016. TfL confirmed it was currently developing plans for a Bakerloo Line Extension, and whilst noted that the phase one extension from Elephant and Castle to Lewisham is included in TfL's business plan for delivery by 2028/9, the Council should reference the extension in Draft Local Plan Policies 35 and 36 to assist the onward delivery of the extension to the town centre and to Hayes alongside the safeguarding of land for the extension where new track is needed. This was reaffirmed in TfL's Hearing Statement in November 2017, which acknowledged that although the timescale for a potential extension beyond Lewisham is beyond the Local Plan period (2030), it would be appropriate to safeguard land and the route alignment where required.

Bromley responded by stating that TfL's current focus is an extension of the Bakerloo line to Lewisham. Beyond 2030 a future phase may be considered but this

is outside the life of the Draft Local Plan. However, Metroisation of services may influence any future phase.

The Council also acknowledged it has been working closely with TfL to identify parts of the network which will benefit from improvements which will reduce bus journey times. However, no projects have been identified in the Infrastructure Delivery Schedule (appendix 10.3) to be delivered over the life of the draft Local Plan.

Whilst the DLR extension to Bromley no longer forms part of TfL's current Business Plan, it remains Bromley's preferred option from Lewisham/Catford to Bromley South via Bromley North. This extension will form part of continuing discussions with TfL regarding the next draft of the Business Plan, and the Council will continue to press TfL to secure funding for this extension.

Policy T6 Parking
Policy T6.1 Residential Parking

Bromley objects strongly to the top down approach to residential car parking standards:

- Policy T6 A - "*car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity*" as there is potential for significant under-provision of car parking. If car parking provision for new residential development were to be based on potential transport investment, then should that provision fail to materialise, developments will be built with abysmal levels of parking. As a result, residents will be forced to park in surrounding roads and will exacerbate parking misery.

- Policy T6 H - "*Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1.*" This should go beyond PTAL 0-1 and be extended to PTALs 2 and 3. Minimum levels of parking for residential development are required in order to ensure new developments do not generate additional intrusive or obstructive on-street parking as a result of inadequate provision.

- Table 10.3 Maximum Residential Parking Standards -

  The proposed Table 10.3 is a particular concern for the Council. Bromley has a higher car ownership per household than the Outer London average. Bromley exceeds the average of households owning 2 or more cars by 5%, and 3 or more cars by 1%. Compared to the Greater London average, there are 10% more households in Bromley with two or more cars. The Council therefore maintains its position that boroughs are best placed to decide the appropriate parking standards for their areas given their detailed knowledge and understanding of the issues, and the nature of the localities.

  Bromley's parking survey also found that car ownership across the developments surveyed was 1.18 cars per household (higher than the 1.15

Borough average from the 2011 census). There is a higher car ownership in wards with lower average levels of public transport accessibility. Wards in the south of the borough, including Biggin Hill, Darwin, and Chelsfield & Pratts Bottom, have the highest levels of car ownership at above 1.5 cars per household. When considering PTAL zones, previous surveys have found that the average range of vehicle ownership in the Borough falls between 0.7 (6a) and 1.1 (2). With no underground stations within the Borough, and PTALs failing to reflect the accessibility for the journeys that the local residents need to undertake to local facilities and services, they are a poor indicator of public transport accessibility for residents in these areas.

Policy T6.2 Office Parking
Table 10.4 Maximum Office Parking Standards

Bromley objects to the proposed parking provision applied to Outer London Opportunity Areas.

Policy T9 Funding Transport Infrastructure through Planning

The Council objects to the level of the Mayoral CIL set to increase in Bromley from £35 to £60 per square metre. The Council objected separately to the CIL consultation (last summer).

In conclusion, Bromley Council raises objections to the draft London Plan and wishes to be represented at the Examination in Public. Nevertheless, if further discussion in the meantime may assist, please make contact.

Yours sincerely

Jim Kehoe
Chief Planner