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Land East of Ploughley Road, Ambrosden – APP/C3105/W/23/3/327213
Rebuttal of Evidence: Nicola Brown

edp4579_r019b

QA: BCo_EDa/SCh_131123

1 INTRODUCTION

- 1.1 My name is Ben Connolley. I am an Associate Landscape Architect at The Environmental Dimension Partnership Ltd (EDP); EDP is a Registered Practice of the Landscape Institute and Corporate Member of IEMA.
- 1.2 This Rebuttal Proof of Evidence (PoE) has been prepared in response to the evidence of Nicola Brown (NB) of Huskisson Brown Associates (Proof of Evidence: Landscape & Visual Effects).
- 1.3 Given the volume of information submitted by NB, this document is not intended to address every point raised on behalf of Cherwell Borough Council (CBC), nor circumvent the requirement to consider these further during the Inquiry; it has been produced to address new key substantive points raised, including those relating to the Landscape and Visual Appraisal (LVA) (CD:A17) methodology which have not been raised to date and, in my view, benefit from clarification in writing prior to the opening of the Inquiry.

2 GENERAL POINTS

- 2.1 The Council's case with regard to Landscape and Visual matters is set out at paragraphs 6.3 to 6.6 of their Statement of Case (SoC). However, NB's PoE goes beyond the scope set out within the SoC.
- 2.2 EDP's LVA was submitted to the Council prior to the submission of the application (as set out within email correspondence included at **Appendix EDP 1**). NB's PoE is the first time that the LVA methodology has been challenged.

3 REBUTTAL POINTS

The Buffer between Ambrosden and Bicester

3.1 It is noteworthy that, as part of the examination to the adopted Local Plan, the Council had included 'Policy ESD 15', which related to the definition of 'green buffers' on the Policies Maps, whereby the Council sought to retain the identity and settings of towns and villages,

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protect the landscape, gaps and views, prevent coalescence and help define limits to settlements (refer to **Appendix EDP 2** for deleted policy text).

- 3.2 However, commentary within the Inspector's report to the examination of the local plan¹ stated that (with my emphasis) "...this policy has been the subject of major criticisms from others. This is partly on the basis that it seeks to introduce an unnecessary and unjustified level of overall restraint on development in the defined areas, when other plan policies, such as ESD 13, are entirely suitable to protect those areas from inappropriate and/or harmful proposals in the countryside".
- 3.3 The Inspector continued to state that "whilst the Council says that it is not intended to preclude development, the true purpose of the policy is questionable at best if that is not the case, given the duplication with other plan policies in relation to aspects such as the protection of important landscape features and heritage assets", and that "[Policy ESD 15] is unsound as submitted and as modified and should be deleted".
- 3.4 The final conclusions of the Inspector stated that "A reworded policy applying only to specific locations meeting the narrower definition of "valued landscapes" ...and/or "areas of environmental or historic significance" ...as defined in the NPPF, particularly around Banbury and Bicester, could be considered by the Council once the local needs of villages have been assessed to identify where development would be inappropriate, for inclusion in the Local Plan Part 2. For the Local Plan to be sound, deleting Policy ESD 15: Green Boundaries to Growth was required. The policy was removed, and the Local Plan was adopted on that basis.

The Cherwell Landscape Sensitivity Assessment (CLSA)

- 3.5 The Cherwell Landscape Sensitivity Assessment (CLSA) (**CD:L13**) forms part of the evidence base to inform the Local Plan Review, which is yet to be examined. Limited weight is given to this guidance and recommendations as these have yet to be fully tested and examined.
- 3.6 This guidance assesses land to the north of Ambrosden as falling within 'LS BIC4: Land North of Ambrosden'. It is noteworthy that the 'Ambrosden Green Buffer' which sought to protect the gap between Bicester and Ambrosden, as defined by Deleted Policy ESD 15, largely reflects the area assessed as BIC4.
- 3.7 At paragraph 5.16, NB states that (with my emphasis) "Development of the north-west facing slopes of the ridge to the scale proposed would be at odds with the existing settlement pattern and would erode the separation between Ambrosden and Symmetry Park/Bicester". This recommendation is only included within the CLSA, which is yet to be fully examined, and this characteristic and recommendation is not included within any of the published documentation.
- 3.8 Importantly, through the removal of Policy ESD 15: Green Boundaries to Growth the separation between Ambrosden and Bicester is not defined anywhere. As set out within the findings of the CLSA, the sensitivity of the host landscape parcel is moderate (which aligns with the LVA) and which is defined as only "Some of the key characteristics and qualities of

¹ Report on the Examination into the Cherwell Local Plan. File Ref: PINS/C3105/429/4

the landscape are sensitive to change. It may have some potential to accommodate the development scenario in certain locations". I therefore consider the question not to be whether there would be any physical reduction in the separation between the settlements but, as set out within the guidance within the CLSA, whether there would be harm to the sense of separation between them.

- 3.9 I have concluded that the provision of new public open space alongside new tree planting, in accordance with the guidelines for the host LCT, would serve to reinforce the landscape structure immediately to the north and maintain a physical and perceptual separation with Bicester. Importantly, whilst the development would evidently impact openness at the site level, when the proposals are viewed in the context of the wider landscape, including viewing experiences from Ploughley Road, there remains an open character to the north of Ambrosden, with built development (including the appeal proposals) appearing spatially appropriate in scale and form given current development patterns and the existing character of the settlement.
- 3.10 The recommendations and guidance set out within the CLSA do not preclude development in this location. The provision of new public open space on currently privately owned agricultural land would serve to retain the experience of the separation between the A41 and commercial uses to the north, yet defining an organic edge to the settlement that is now reflected on the southern and western sides of the village.
- 3.11 As I have set out within my PoE (para 3.55), "I accept that the appeal proposals would be visible. However, I find that for any views in which the appeal proposals would be considered an identifiable component, this would be limited to a short section of a relatively busy road corridor, namely Ploughley Road. Within these views, the appeal proposals would be most regularly experienced by road users, being low sensitivity receptors due to their focus of the view being the road, rather than an enjoyment of a wider view. However, some pedestrians with a medium sensitivity may also experience views of the proposals over or through a mature hedgerow, albeit with the most open views being experienced from within an existing peri-urban context, being influenced by urban form within Ambrosden". Furthermore, as I have demonstrated within a number of wirelines (Appendix EDP 1 to my PoE), for the most part, views from Ploughley Road are curtailed by a mature hedgerow, currently with only views from field access points being the most open. This results in any change to landscape character, and viewing experiences along Ploughley Road, being extremely limited.

The 'Ridge' of Blackthorn Hill

- 3.12 NB also refers to the guidance point for LS BIC4: Land North of Ambrosden which suggest to "Avoid development on higher ground, including the ridge which forms a continuation of Blackthorn Hill to the north". It is important to put this into context with the broader conclusions of the CLSA, which remains untested, for the land parcel within which the appeal site sits, and also the land further north which relates to Blackthorn Hill.
- 3.13 LS BIC3: Blackthorn Hill and Surroundings is a land parcel located to the north of the A41, being described as being "undulating, reaching a high point of 81m AOD at Blackthorn Hill, which is a distinctive feature in the local landscape". In terms of guidance for LS BIC3, the CLSA guidance is more prescriptive, its purpose being to "to help reduce adverse effects on

landscape and views and to maximise benefits arising from development", suggesting to "Avoid building on prominent and open slopes or elevated areas where development is likely to have localised visual prominence". So, with reference to Blackthorn Hill, the question is not solely one of high ground, but whether development could be avoided on 'open and prominent slopes', where development is likely to have a visual prominence.

- 3.14 As illustrated at Image BC 8 and 13 within my PoE, the land to the east of the appeal site is more open, being seen as elevated open ground that extends from Blackthorn Hill to the north. Importantly, as can be seen within the supporting photography with my PoE, and also within the Photoviewpoints within the LVA, the higher ground that relates to the appeal site is already occupied by existing residential development which is generally seen as an elevated hard settlement edge, particularly in winter views. The 'ridge' is identified within the characteristics of Local Character Area D: Ambrosden within the Pasture Hills Landscape Type, however, there is no reference of this ridge forming a valued component of the landscape. For receptors travelling along PRoW No. 10/6/20, there is a stark contrast in the character of views, ranging from the more open land to the east, on higher ground associated with Blackthorn Hill, to the more enclosed views adjacent to the appeal site that are heavily influenced by the existing settlement.
- 3.15 As I have concluded within my PoE, I do not consider the appeal site to be a prominent site. Local topography, in combination with mature landscape features and built form prevents many views of the appeal site from the surrounding context; this limitation is also aided by the fact that there are very few PRoW surrounding the appeal site. In fact, I consider the appeal site to have limited visual interest and is barely perceptible in views from within the surrounding context. Views of the appeal site are extremely localised, generally only perceived by receptors passing along a relatively busy road (Ploughley Road), which passes the western boundary of the appeal site, and also from a PRoW, which runs along the southern boundary within a peri urban context.
- 3.16 Furthermore, as set out within the 'village analysis' which was undertaken by WYG (CD:L8), and which has also been referenced by NB, there are no key views, nor any middle or long-distance views across the appeal site.
- 3.17 With regards to the relationship with Blackthorn Hill, I do not consider the appeal site to form part of the 'open and prominent slopes', where development is likely to have a visual prominence. Where views of the appeal site are possible, it is seen in the context of the existing settlement edge of Ambrosden, rather than the more open land to the east. Therefore, I do not consider the development of the appeal site to conflict with the guidance set out within LS BIC4: Land North of Ambrosden.

The Relationship with the Settlement Edge

3.18 At paragraph 4.21, NB states that "The curved primary access (noted on the Parameter Plans as 'Indicative') jars with both the well-established regular field pattern and the linear/stepped form of the existing settlement edge and symmetrical village gateway in the locality", that would be in contrast with the "linear settlement boundary and western gateway into the village". I have assessed the evolution of Ambrosden within my PoE, noting that recent planning consents within the village move away from linear edges and symmetrical gateways, such as the site at Merton Road to the west and the Hallam site to

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the east. As above, such 'symmetrical' gateways and thresholds into Ambrosden are not something that is identified as a valued characteristic within published documentation.

- 3.19 With regards to field pattern, as I have demonstrated within my PoE, I consider the appeal site to have limited interest within this landscape and is barely perceptible in views from within the surrounding context. This includes the field pattern which, for the most part, is retained within the proposals. Short sections of species-poor hedgerows would be removed to enable access, though the wider pattern of the landscape fabric as experienced in local views would remain, as the proposals would strengthen the small-scale field pattern by planting up gappy hedges using locally characteristic species such as hawthorn, and hedgerow trees such as oak, particularly within roadside hedges; this forming part of the small-scale field pattern by planting up gappy hedges using locally characteristic species such as hawthorn, and hedgerow trees such as oak and ash particularly within roadside hedges."
- 3.20 Furthermore, the planting of new trees, scrub and wildflowers would add to the landscape fabric and biodiversity value of both the appeal site and the immediate context, as would the planted Sustainable urban Drainage System (SuDS) features.
- 3.21 As I have set out within my PoE, the settlement edge of Ambrosden has evolved over time; The proposals at Merton Road to the west and within the Hallam site to the east move away from this abrupt and stark transition which formed part of the baseline landscape. Of particular relevance are the comments of the Merton Road Inspector (Appeal Ref: APP/C3105/W/19/3228169) (CD:M6) who, when considering development at the western side of the village (refer to Appendix EDP 2 to this document), stated that (with my emphasis) "The Council suggests that the abrupt and stark transition from what is described as an 'urban' to a rural environment at the south-western end of the village is part of local distinctiveness. I am not convinced that this is a particularly beneficial characteristic that necessarily needs to be respected by new development or one which would be undermined if the proposal went ahead". This same conclusion applies to the appeal site where, particularly in winter months when views are more apparent, the existing settlement edge adversely affects local character, being experienced as a stark contrast between urban form and open countryside.
- 3.22 With regards to development on the eastern side of Ambrosden (Planning Ref: 22/01976/OUT), the illustrative proposals (included at **Appendix EDP 3** to this document for ease) included new public open space with woodland planting and informal footpath routes which are notably organic in alignment. Here, although the proposals further stagger the settlement approach and move away from a 'symmetrical village gateway', the landscape officer only concluded that "The inclusion of new community woodland in the eastern field will change the landscape character of field and hedgerow and provide microclimatic improvements (Shelter, etc), public amenity (health and wellbeing)". The landscape officer then agreed with the conclusions of the submitted LVA to that application, which stated that "The proposals include carefully considered design measures and landscape strategies to minimise the level of adverse effects on landscape character and visual amenity, and to deliver opportunities for long term enhancements through, for example, new accessible green space for health and well -being, and by introducing new

landscape habitats such as woodland planting, native trees, hedges and grassland that provide benefits for biodiversity and landscape character. This forms a Green Infrastructure (GI)11 framework that provides an appropriate setting and context for new housing". I consider that the same conclusion would apply here.

3.23 As set out within the LVA (Para 6.4), the landscape strategy for the appeal proposals includes "Linear tree planting is proposed alongside built form to break up the roof scape in views towards the site. This ensures the quantum of built form is broken up into smaller scale elements and integrates better into the existing landscape". This approach would improve the relationship between Ambrosden and the immediate open countryside, with new public open space contributing to the experience of the separation between Ambrosden and Bicester, and with a landscape strategy aimed at responding to the more linear network of intact hedges found within the receiving landscape. Furthermore, as acknowledged by NB at paragraph 4.6, it is acknowledged that the landscape proposals are illustrative and not for determination.

NB Photoviewpoints

- 3.24 NB presents few additional views of the appeal site and its context; each view being recorded within a short distance of the site (the focus being from Ploughley Road and from PRoW No. 105/6/20).
- 3.25 However, NB provides a photo from Ploughley Road (referred to as 'NB5') which is not recorded from the footpath and, as such, is not representative of the viewing experiences for receptors travelling south along this road corridor. NB has moved off the footpath, recording an image that is more open than views currently experienced from Ploughley Road.

4 **METHODOLOGY**

Susceptibility to Change

- 4.1 NB's evidence challenges the EDP methodology at paragraph 7.4 onwards, stating that (with my emphasis) The EDP LVA methodology correctly states that "Sensitivity is made up of judgements about the value attached to the receptor, which is determined at the baseline stage, and the 'susceptibility' of the receptor, which is determined at the assessment stage" (paragraph A2.2) Despite this, the LVA considers both landscape susceptibility and landscape sensitivity as part of the existing baseline conditions at LVA Section 4, drawing "Interim Conclusions" on landscape character at paragraphs 4.15 to 4.19. This potentially skews the assessment in that susceptibility is not addressed in relation to the proposed development".
- 4.2 Importantly, as set out within the LVA, the Council were approached during the production of the LVA in order to agree the methodology and scope of the appraisal. As the development is not considered to require the production of an Environmental Impact Assessment, the LVA was produced as an appraisal rather than a full impact assessment, in accordance with the principles embodied in 'Guidelines for Landscape and Visual Impact Assessment - Third Edition (LI/IEMA, 2013)' (GLVIA3) and other best practice guidance. Therefore, the 'significance' of the effect has not been provided; the LVA, and my PoE, went as far as

identifying the level of harm arising from the proposals for the decision-maker to consider within the wider planning balance. There was never any suggestion from the Council Officers that the findings of the LVA were unclear, nor are there any specific points raised within the Council's Statement of Case.

- 4.3 As NB identifies, in line with the Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), the EDP methodology correctly states that "Sensitivity is made up of judgements about the value attached to the receptor, which is determined at the baseline stage, and the 'susceptibility' of the receptor, which is determined at the assessment stage". Importantly, paragraph 4.15 within the LVA confirms this, stating that (with my emphasis) "The susceptibility of the landscape and townscape resource is defined as the ability of the receptor (whether the overall character, individual fabric elements or perceptual aspects) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation".
- 4.4 As set out at GLVIA3 paragraph 1.17, "Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional". Having reviewed the LVA, particularly as the nature of the proposed development was known at the time of its production, I conclude that the author of the LVA has correctly considered and recorded susceptibility to change with consideration of the proposed development in line with guidance, being presented within a proportionate appraisal. In providing a proportionate LVA, this is then presented within Section 4 of the LVA.

Overall Sensitivity

- 4.5 NB's PoE (at paragraph 7.6) criticises the LVA methodology, suggesting it is inevitable that "a high value landscape also has high susceptibility to be assessed as being of high sensitivity". This is not the case and is a misinterpretation of the EDP methodology.
- 4.6 As stated at Table EDP A2.1 within the LVA (with my emphasis), criteria is provided "...by which the <u>overall sensitivity of a landscape receptor is judged</u> within this assessment <u>and</u> considers both value and susceptibility independently". These independent judgements, based on the stated criteria are then combined, with professional judgement, to come to an overall sensitivity.
- 4.7 Table A2.1 offers a template for assessing overall sensitivity of any landscape or visual receptor as determined by combining judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape as set out at paragraph 5.39 of GLVIA3. However, professional judgement may demonstrate that assessment of overall sensitivity can change on a case-by-case basis; For example, a high susceptibility to change and a low value may result in a medium overall sensitivity, unless it can be demonstrated that the receptor is unusually susceptible or is in some particular way more valuable. Essentially, a degree of professional judgement applies in arriving at the overall sensitivity for both landscape and visual receptors.
- 4.8 NB's PoE also states that (paragraph 7.8) that "the EDP methodology criteria do not allow for undesignated countryside to be valued above 'Medium'".

- 4.9 Importantly, in enabling the overall professional judgement of overall sensitivity, the EDP methodology considers not only the designatory status of the landscape, but also the value of the landscape. As such, NB's statement is incorrect as, for example, a high sensitivity could also apply to a locally valued landscape.
- 4.10 The LVA considers the value of the appeal site and its context with regard to the general criteria set out within Box 5.1 of GLVIA, though I provide further consideration of landscape value with regard to the more recent Technical Note provided by the Landscape Institute (TGN 02-21) (CD:L5) within my own PoE. Both were aligned in that the appeal site itself is no more than ordinary and does not have any elevated landscape value or importance above the rest of the local or wider context. Furthermore, there is no evidence to suggest that the local community places special weight on the site, meaning overall the site is considered to be of no more than local landscape value. Furthermore, it is agreed between the parties that the appeal site and its context is not within a valued landscape for the purposes of NPPF 174(a). Para 174(a) is therefore not engaged.
- 4.11 I remain of the opinion that the overall sensitivity of the appeal site and its context in landscape terms is medium.

5 CONCLUSIONS

- 5.1 I have reviewed my evidence in the light of NB's PoE and have reached the same conclusions, which are aligned with those contained in the LVA.
- 5.2 Having studied the appeal site and its context, as well as recent planning permissions around the settlement, I remain of the opinion the character of the current settlement edge has evolved in recent years. Where the "linear/stepped form of the existing settlement edge" is present adjacent to the appeal site, as noted by NB, I consider that the conclusions of the Merton Road Inspector are relevant and would also apply here, in that this is not a "particularly beneficial characteristic that necessarily needs to be respected".
- 5.3 I consider the landscape strategy to be appropriate and I do not consider that the appeal proposals are inappropriate in a spatial sense. As concluded within my PoE, landscape and visual effects arising from the appeal proposals are extremely limited, while the northward extension of Ambrosden, owing to the delivery of a suitable Green Infrastructure provision and mitigation measures within the northern areas of the appeal site, seems to me entirely appropriate in scale in terms of the evolution of the settlement, retaining the separation between the A41 and commercial uses to the north, yet defining an organic edge to the settlement that is now reflected on the southern and western sides of the village.
- 5.4 Following NB's criticisms of the LVA methodology, this being the first time that the Council have provided such criticism, I have reviewed the methodology in line with the guidance set out within GLVIA3. I consider the LVA to have been produced in accordance with the principles embedded within published best practice guidance.

Appendix EDP 1 Correspondence with the Council during the production of the LVA

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Ben Connolley

From: Tim Screen@Cherwell-DC.gov.uk>

Sent: 14 April 2022 16:45

To: Lucy Tilling

Subject: RE: edp4579 - Ploughley Road, Ambrosden - LVA consultation

Hi Lucy

I am sorry I have been unable to review. I have been rushed off my feet. I will do this as soon as I am able. I suggest you incorporate your proposed viewpoint with the narrative of your report, and I will visit the VP locations and provide a response at that time.

Best regards

Tim

Tim Screen CMLI

Landscape Architect
Environmental Services
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From: Lucy Tilling < lucyt@edp-uk.co.uk>

Sent: 14 April 2022 10:53

To: Tim Screen <Tim.Screen@Cherwell-DC.gov.uk>

Subject: RE: edp4579 - Ploughley Road, Ambrosden - LVA consultation

CAUTION: This email originated from outside of the Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Morning Tim,

I was wondering if you've had a chance to review the proposed viewpoints for the below project?

Kind regards,

Lucy

Lucy Tilling *BSc, MA, CMLI*Consultant Landscape Architect



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From: Lucy Tilling

Sent: 24 March 2022 17:30

To: Tim Screen <Tim.Screen@Cherwell-DC.gov.uk>

Subject: edp4579 - Ploughley Road, Ambrosden - LVA consultation

Good afternoon Tim,

I'm working on a residential project on Ploughley Road in Ambrosden. We are progressing the landscape assessment for the project and would like to ask for confirmation of our proposed viewpoint locations.

Please find attached the following information:

- Consultation Plan showing the ZTV and proposed viewpoint locations (please note the ZTV is an
 exaggeration of the actual visual conditions surrounding the site);
- · Our assessment methodology; and
- A KML. File that can be imported into google earth/google maps to show the viewpoint locations.

If you could comment on the proposed locations and our methodology and confirm if the outlined approach is acceptable that would be very much appreciated.

Kind regards, Lucy

Lucy Tilling *BSc, MA, CMLI*Consultant Landscape Architect



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Appendix EDP 2 Policy EDP 15 Green Boundaries to Growth – Deleted Policy Text

"Proposals for development on the edge of the built up area must be carefully designed and landscaped to soften the built edge of the development and assimilate it into the landscape by providing green infrastructure that will positively contribute to the rural setting of the towns. Existing important views of designated or attractive landscape features will need to be taken into account. Proposals will also be considered against the requirements of Policy ESD 13: Local Landscape Protection and Enhancement. In addition, Green buffers as indicated on the Policies Proposals Maps will be maintained to: Maintain Banbury and Bicester's distinctive identity and setting Protect the separate identity and setting of neighbouring settlements which surround the two towns".

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Appendix EDP 3 Recently Consented Developments within the Local Context

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