SCOTTISH BORDERS COUNCIL

PLANNING AND BUILDING STANDARDS COMMITTEE

15 JUNE 2023

APPLICATION FOR PLANNING PERMISSION

ITEM: REFERENCE NUMBER: 22/01988/FUL

OFFICER:	Mr Scott Shearer
WARD:	Mid Berwickshire
PROPOSAL:	Construction and operation of battery energy storage system facility with ancillary infrastructure and access
SITE:	Land West Of Eccles Substation Eccles Coldstream
APPLICANT: AGENT:	Eccles Grid Stability Limited SLR Consulting Limited

PLANNING PROCESSING AGREEMENT:

A planning processing agreement is in place for the application to be determined at the 15th June P&BS Committee.

SITE DESCRIPTION

The application site is located approximately 2.8km to the east of the village of Eccles in Berwickshire. The site extends across two fields. The Eccles electricity substation, managed by Scottish Power Energy Networks lies directly to the west of the site. Access is provided via the A697, which lies directly to the south. The site separated from the public road by mature hedging.

Todrig Farm is located approximately 200m to the north, A R Timber Products, a commercial sawmill is located on the opposite side of the road to the south west and Hatchedize Farm to the south east. Three residential properties, Woodside, The Bungalow and Rossander, are located approximately 80 metres to the south of the application site.

The site is not located within or adjacent to any designated landscapes. No ecological or heritage designations lie within or immediately adjacent to the site. The site is designated as Prime Quality Agricultural Land (PQAL) within the Local Development Plan 2016 (LDP).

PROPOSED DEVELOPMENT

Consent is sought for the installation of a Battery Electricity Storage System (BESS) and associated infrastructure with a maximum storage capacity of 50MW. The proposal constitutes a Major Application under the Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009 because the development constitutes the construction of an electricity generating station with a capacity in excess

of 20MW (NB where capacity exceeds 50MW consent is required under Section 36 of The Electricity Act 1989. This development does not meet this higher threshold).

The main components of the proposals are:

- Forty battery units arranged in 10 blocks of four
- Ten 11kV transformers and power conversion blocks
- 132kV transformer
- Substation
- Switch and maintenance rooms
- Construction access
- Maintenance access
- Security fencing
- Acoustic fencing
- Landscaping

PLANNING HISTORY

Previous planning applications on this site comprise:

- 21/00507/FUL Erection of synchronous condenser and associated ancillary infrastructure Land East Of Eccles Substation Eccles Approved
- 21/01299/FUL Formation of access junction and track to provide maintenance access for the Eccles Synchronous Condenser Withdrawn
- 21/01567/FUL Formation of access junction and track to provide maintenance access for the Eccles Synchronous Condenser – Land South East Of Eccles Substation – Approved
- 13/00247/FUL Construction of 400kV Series Capacitor Bank Compound, associated access road, drainage and landscaping works Approved

The following planning history is also relevant to the proposal and the immediate surrounding area:

- 22/01532/S36 Erection of Battery Electricity Storage System (BESS) and Associated Infrastructure - Land East Of Fernyrig Farm – SBC recommended approval to the Energy Consents Unit (ECU), final determination is awaited from ECU
- 23/00249/FUL Extension to the existing substation and erection of two hybrid synchronous compensators - Land North Of Eccles Substation – Under consideration
- 22/00429/S37 Erection of 33Kv overhead power line Land Between Todrig Farm Eccles And Station Road Industrial Estate Duns – No objection
- 21/01725/FUL Installation of Synchronous Compensator Land West Of Eccles Sub Station – Withdrawn following access issues

REPRESENTATION SUMMARY

No third party representations have been received.

APPLICANTS' SUPPORTING INFORMATION

The application has been supported by:

- Planning and Access Statement
- Historic Environment Desk Based Assessment
- Preliminary Ecological Assessment
- Landscape and Visual Assessment
- Noise Impact Assessment
- Flood Risk Assessment
- Transport Assessment
- PAC Report

CONSULTATION RESPONSES:

Environmental Health: No objection. Satisfied that the development will not give rise to noise levels which would pose any amenity concerns. Recommend that noisy construction work should be limited to Monday to Friday 0700 – 1900, Saturday 0800 – 1300 with no permitted noisy work on Sunday or public holidays unless agreed with the Council.

Roads Planning Service: No objection. Road access issues have been thoroughly discussed during previous applications. Confirm that location of the accesses are acceptable. Matters covering; visibility splays, construction details and lining of the new access should be agreed by conditions.

DEVELOPMENT PLAN POLICIES

Local Development Plan 2016 (LDP):

Policy	Policy Name
Reference	
PMD1	Sustainability
PMD2	Quality Standards
ED9	Renewable Energy Development
ED10	Protection of Agricultural Land and Carbon
	Rich Soils
HD3	Protection of Residential Amenity
EP1	International Nature Conservation Sites
	and Protected Species
EP2	National Nature Conservations Sites and
	Protected Species
EP3	Local Biodiversity
EP8	Archaeology
EP10	Gardens and Designated Landscapes
EP13	Trees Woodlands and Hedgerows
EP15	Development Affecting the Water
	Environment
IS5	Protection of Access Routes
IS8	Flooding
IS9	Waste Water Treatment Standards and
	Sustainable Urban Drainage

Supplementary Planning Guidance

- Biodiversity (2005)
- Landscape and Development (2008)
- Local Biodiversity Action Plan: Biodiversity in the Scottish Borders (2001)
- Local Landscape Designations (2012)
- Placemaking and Design (2010)
- Renewable Energy (2018)
- Trees and Development (2008)

National Planning Policy Framework 4 (NPF4)

Policy	Policy Name
Reference	
1	Tackling the climate and nature crises
2	Climate mitigate and adaptation3
3	Biodiversity
5	Soils
6	Forestry woodland and trees
7	Historic assets and places
11	Energy
14	Design, Quality and Place
22	Flood risk and water management
23	Health and safety
29	Rural Development

Other Planning Considerations

Energy Policy

- The Scottish Energy Strategy (SES): The Future of Energy in Scotland (2017)
- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
- The Scottish Government, Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero (2020)
- The UK Government Energy White Paper 'Powering our Net Zero Future' 2020
- Climate Change Committee (CCC), The UK's Sixth Carbon Budget (December 2020)
- Scotland's Energy Strategy Position Statement 2021

KEY PLANNING ISSUES:

- Planning Policy Principle
- Impact on Prime Quality Agricultural Land
- Landscape and Visual Impacts
- Impacts on Road Safety
- Impacts upon the Built and Natural Environment, including Protected Species
- Noise impacts
- Impact on Drainage

ASSESSMENT OF APPLICATION:

Planning Policy Principle

The proposed development is located on land that benefits from an implementable permission for electricity infrastructure for Scottish Power Energy Network (SPEN) under consent 21/00507/FUL. It is understood that SPEN are no longer pursing the siting of this infrastructure on this site and are instead seeking to site similar equipment to the rear of the existing substation. This is being considered under application 23/00249/FUL. Nevertheless, the presence of an implementable permission for energy related operations is a material consideration for this application.

The development will not generate electricity, instead, it provides a location where it can be imported, stored and exported to meet the demands of the grid network. Policy 11 (Energy) of NPF4 promotes the development of battery storage as a renewable technology which can assist in meeting zero emissions targets. It is anticipated that the development will store energy from both renewable and non-renewable sources. The development also draws support from Policy 1 (Sustainable Places) of NPF4, which requires that significant weight is given to developments that seek to address the climate emergency and Policy 2 (climate mitigation and adaptation) by reducing future energy emissions.

At a local level, Policy ED9 Renewable Energy Development and the Renewable Energy SG confirm SBC are supportive of a range of renewable energy developments to reduce carbon dioxide emissions and address the global climate emergency. To achieve net zero, there will be greater demands to store energy and more emphasis placed on meeting our energy demands from renewable sources such as wind and solar. During and after the transition to net zero, there will be times when these technologies are not able to generate enough electricity or have operational issues. At these times, surplus energy stored at battery storage stations can be used to meet grid demands. It is also worth considering that by having greater storage potential in the short term it may help to reduce the amount of non-renewable energy which is required to be generated which can help to lower carbon levels over this period.

This proposal will play an important role as part of the wider mixture of renewable energy technologies to decarbonise electricity supplies and meet the commitments of the Climate Change Act. The proposal aligns favourably Policies 1, 2 and 11 of NPF4 which promote developments which help to meet net zero targets and complies with the aims of Policy ED9 of the LDP. The primary test for this development is whether it can accommodated without unacceptable significant adverse impacts or effects, giving due regard to relevant environmental, community and any cumulative impact considerations. This will be assessed in subsequent sections of this report.

Impact on Prime Quality Agricultural Land (PQAL)

The site is allocated as PQAL within the LDP. The Macaulay Institute has classified the site as being Class 2 PQAL where the land is capable of producing a wide range of crops. Policy ED10 seeks to avoid developments that result in the permanent loss of PQAL unless certain policy criteria are met or the proposal is for renewable energy development which is compliant with the objectives and requirements of Policy ED9. Policy 5 (Soils) of NPF4 has adopted a similar position where development on PQAL is only acceptable under certain criteria, one of which is that the development is for the generation of renewable energy.

Other than that area of the maintenance access, the majority of the site does not appear to be actively used as farmland. As established above, this proposal constitutes contributes to the overall mix of renewable energy developments which are required to meet net zero emissions targets which are embedded in national planning and energy policies. There are benefits of the development being located on this area of land where its close proximity to the Eccles substation is understood maximise the efficiency of exporting stored electricity to the grid and reduce the extent of associated equipment such as high voltage overhead lines and pylons.

It is accepted that there is a land use planning rationale for this site being a suitable location for this type of development with the site also benefiting from an implementable permission to develop the PQAL. Nevertheless, the categorisation of the proposal being a form of renewable energy development does render it as being exempt from restrictions that could be imposed by Policy ED10 of the LDP and Policy 5 of NPF4.

Policy ED10 requires that renewable developments which take place on PQAL is fully compliant with the requirements of ED9. The proposal is assessed against all relevant criteria of ED9 below.

Landscape and Visual

NPF4 Policy 11 and LDP Policy ED9 requires consideration of the proposed developments landscape and visual impacts. The application has been supported by a Landscape and Visual Appraisal, which includes a zone of theoretical visibility and photographs from selected viewpoints. Policy PMD2 of the LDP also requires that the development is of a high quality design and respects the visual amenity of its environment.

The siting of the proposal means the development is set back from the A697. The 'substation connection infrastructure', which includes electrical pylons and the main transformer, are located to the rear of the site and adjacent to similar equipment in the neighbouring Eccles substation. The maintenance and switch room flank the substation equipment. The layout is dense but it does appear well thought-out. The compound is enclosed with a combination of 2.74m high palisade fencing and a 4m high acoustic fence. The acoustic fencing extends from the western boundary around to the south west corner enclosing this side of the battery units. The height of the equipment is relatively low but the potential impact of the acoustic and palisade fencing could be greatest in landscape and visual terms.

The development is located within landscape character type (LCT) 106 Lowland with Dumlins which is a gently undulating landscape dominated by the regular pattern of large arable fields. The development would alter the topography of the site. While the precise finished ground levels are unknown the extent of the change is unlikely to be significant. This part of the LCT is already characterised by the presence of the Eccles substation. When compared to the scale of the equipment within the existing substation and the height of the equipment approved within application 21/0507/FUL, the components of this development are much smaller, which will limit potential impacts on the landscape.

The siting of the development back from the A697 and behind the established roadside hedge will generally screen direct views of the development from the A697. Formation of the maintenance access will not likely impact on the hedge but its retention can be covered by planning condition. The ZTV suggests that there is some visibility to the north, east and west. These are not views from any significant receptors. As already stated, the developments low lying nature of means that visibility will often be filtered by the intervening landscape. In the limited instances when the development is visible, attention will be drawn to the much taller apparatus contained within the Eccles substation alongside this development. It would be sensible if the landscaping strip along the eastern boundary were extended around the top of the site to screen views from the north. The applicants have agreed that this can be accommodated by pushing the layout of the proposals in a southerly direction. Agreement of the final layout and landscape details can be agreed by condition.

The battery units will be set within aluminium enclosures coloured white (RAL9003). A green material finish, similar to the colouring of the maintenance and switch room would be preferred, however the development is positioned alongside existing light grey coloured equipment at the Eccles substation and for the most part it will be screened by landscaping and acoustic fencing. In this context, the white colouring of the battery units is not harmful. The precise material finish including colour of all structures can be agreed by condition. This should also include the final detail and finishes of the acoustic and palisade fencing to ensure the equipment integrates with the character of the surrounding area.

It is considered that the development would not adversely impact on the landscape character or visual amenity of the surrounding area subject to final agreement of the siting and design of all equipment, finished site levels, all external material finishes and colours and improved landscaping around the boundaries of the site. If Members were minded to approve this application, it is recommended that these matters can be addressed by suitably worded planning conditions.

Access

The impact of the development on road safety are considered against Policy 11 of NPF4 and LDP Policy EP9. In addition Policy LDP Policy PMD2 requires all development to avoid causing any adverse impacts on road safety.

The site is accessed directly via the A697. Road safety implications have previously been investigated under application 21/00507/FUL. The site is already served via an existing field access directly to the SE of the main compound. This access point will provide access for construction operations, however, it has restricted eastward visibility on to the A697 and considered unsafe for use as a permanent site access. A further application for amended access proposals on to the A697 was submitted under application 21/01567/FUL. This includes proposals to close the construction access once the construction phase is complete.

This latest proposal has mirrored the access arrangements previously accepted under applications 21/00507/FUL and 21/01567/FUL. Roads Planning remain satisfied that these access arrangements are acceptable. Further details of the maintenance access are required to be agreed in the form of; its construction specification, including surfacing, kerbing and gates; visibility splays, although it is has been accepted that visibility over sufficient distances can be provided from this point in both directions; and road lining. Each of these matters can be addressed by planning condition. It will still be appropriate for the construction access to be permanently closed off after the development becomes operational which will see a post and wire fence installed across the access and road verge reinstated to avoid multiple accesses on the A class road. In addition to these works it would be appropriate for a section of hedging to the planted across this access to add further screening from what otherwise would be a

gap along the site of the road to further screen the development and protect the visual amenity of the area. The incorporation of hedging at this location can be agreed via the landscaping condition.

Residential Amenity

Policy ED9 requires the impacts on communities and individual dwellings (including noise impacts) to be considered with Policy 11 of NPF4 seeking impact on amenity to be addressed by the project design and mitigation. Policy HD3 states that development that is judged to have an adverse impact on the amenity of residential areas will not be permitted and Policy 23 (Health and safety) of NPF4 seeking to guard against developments which pose unacceptable noise issues.

The closest neighbouring residential properties lie to the south on the opposite side of the public road. The development will not pose any adverse impacts on the visual amenity of these dwellinghouses. A Noise Impact Assessment has been carried out which has considered noise impact from the operation of the equipment on neighbouring residential properties. The noise assessment concludes that the development will not generate noise levels to the detriment of residential amenity of neighbouring properties. A planning condition is recommended to control noise levels of all plant and machinery.

Flood Risk and Hydrology

Policy ED9 and IS8 of the LDP and Policy 11 of NPF4 requires consideration of the effect of renewable energy development on hydrology and flood risk.

The Eccles Burn and a tributary of the Wallace's Brook are located approximately 250m to the north and 180m to the northwest of the application site. SEPA flood mapping confirms that the site is outside of areas of flood risk associated with these watercourses. There is no evidence to suggest that the development poses any flooding concerns.

The development creates a sizeable area of hard surface which will generate surface water. Policies IS9 of the LDP and Policy 22 (Flood risk and water management) seek for surface water to be handled through sustainable urban drainage systems (SUDS). It will be important that surface water does not impact on the public road. Agreement of a detailed drainage layout, in accordance with SUDS principle can be agreed by planning condition.

Ecology

The proposal has to be assessed against policies EP1, EP2 and EP3 of the LDP and Policy 3 of NPF4 which seek to protect international and national nature conservation sites, protected species and habitats from development.

The site is not located with or in close proximity to any designated ecological sites. A Preliminary Ecological Assessment has been carried out which identifies there is no evidence of any protected species within the application site. There is potential for breeding birds within surrounding habitats, therefore, development works should not commence during the breeding season unless suitable checks are undertaken.

In accordance with Policy 3 of NPF4 and EP3 there are opportunities for biodiversity enhancements to take place, most notably the provision of wildlife strips and hedgerow

management. These matters can be addressed by suitably worded planning conditions.

Cultural Heritage

The application has to be assessed against Policy ED9 of the LDP and Policy 7 of NPF4 in respect of impacts on the historic environment and in this case principally Policies EP8 and EP10 which seek to protect archaeological assets and Gardens and Designed Landscapes respectively.

There are known archaeological assets within the surrounding environment. A series of trial-trenching was undertaken within the site as part of application 13/00247/FUL with no evidence of any buried archaeology found.

The Mount, motte-and bailey castle SAM is located 1.5km to the east overlooking the Leet Water. The Hirsel Garden and Designed Landscape (GDL) is located approximately 1.8km to the east of the site. The low lying nature of the development and its location alongside taller electrical equipment ensures it would adversely affect the setting of either historical asset. The extension of boundary planting around the NE of the site will help to further screen development from the SAM.

The development does not adversely affect the setting of any Listed Buildings or Conservation Areas.

Having considered the proposal against relevant LDP policies covering cultural heritage, including archaeology and NPF4 policy provision on these matters, the development will not pose any conflicts subject to condition securing suitable boundary planting.

CONCLUSION

The development would contribute towards meeting Scottish Government national energy targets and the transition towards net zero. The proposal would result in some minor landscape and visual impacts but these will be localised and will not result in unacceptable adverse impacts, subject to suitable landscaping/boundary treatments and agreement of the final appearance of the equipment. Noise impacts will not result in unacceptable adverse impact son residential amenity, subject to conditions regulating noise emissions from the site. Suitably worded planning conditions can also agree appropriate access to the site during both the construction and operational phase of the development. Overall, it is accepted that the development complies with prevailing policies of the Scottish Borders Council Local Development Plan and NPF4 and there are no material considerations that would justify a departure from these provisions, subject to the agreement of matters covered within the recommended planning conditions.

RECOMMENDATION BY CHIEF PLANNING AND HOUSING OFFICER:

I recommend the application be approved subject to the following conditions:

 The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Reason: To comply with Section 58 of the Town and Country Planning (Scotland) Act 1997, as amended.

- 2. No development shall commence until the following precise details have been submitted to and agreed in writing with the Planning Authority;
 - i. The final site layout
 - ii. The design and appearance of all buildings and equipment to be installed within the site including their external material and colour finish.
 - iii. The design and appearance of all acoustic fencing, means of enclosure and gates including their material and colour finish

Reason: Further details are require to achieve a satisfactory form of development which respects the character and amenity of the rural area.

3. No development shall commence until a scheme of phasing has been submitted to agreed in writing by the Planning Authority. This shall include a programme for completion of the main elements within the development including the siting of the battery storage equipment, ancillary infrastructure, the construction access and the maintenance access. Once approved, the development shall then be carried out in accordance with the approve scheme.

Reason: To ensure that the development of the estate proceeds in an orderly manner.

- 4. No development shall commence until a scheme of landscaping works, which has first been submitted to and approved in writing by the Planning Authority. Details of the scheme shall include;
 - i. Existing and finished ground levels in relation to a fixed datum preferably ordnance
 - ii. Indication of existing trees and hedges to be removed, those to be retained and, in the case of damage, proposals for their restoration and thereafter no trees or hedges shall be removed without the prior consent of the Planning Authority.
 - iii. Location of new trees, shrubs and hedges, which includes extending the landscaping around the northern boundary of the site and landscaping at the reinstated roadside verge following closure of the construction access.
 - iv. Schedule of plants to comprise species, plant sizes and proposed numbers/density
 - v. Programme for completion and subsequent maintenance.

Reason: To ensure the satisfactory form, layout and assimilation of the development.

- 5. No development shall commence until precise details of the access upgrades are submitted to and agreed in writing with the Planning Authority, the details shall include;
 - i. Visibility splays of 2m x 215m in either direction at the junction with the A697.
 - ii. Specification of the surfacing and kerbing of the new access between the carriageway of the public road and site gates.
 - iii. The laying of a white edge line in accordance with diagram 1010 of the Traffic Signs Regulations and General Directions 2016 across the new access with the carriageway of the public road.

Thereafter the development should be completed in accordance with the agreed details and retained in perpetuity thereafter, unless otherwise agreed in writing with the Planning Authority.

Reason: To ensure that the access is formed to an appropriate standard which conforms to road traffic regulations and protects the integrity of the public road.

6. Within 2 weeks of the development hereby approved being brought into use the construction vehicular access shall be permanently closed off in accordance with the details shown on the approved drawing (drawing no. ECB02). Notwithstanding

the provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 or any order amending, revoking or reenacting that Order, the existing access shall not subsequently be reopened and no new access, other than that approved under this planning permission, shall be formed, laid out or constructed under the terms of Class 8 of Schedule 1 to that Order without an express grant of planning permission from the Planning Authority.

Reason: To ensure that the development is carried out as proposed and to minimise the number of accesses into the development, in the interests of road safety.

- 7. No development shall commence until the detailed drainage design which complies with SUDs principles has first been submitted to, then approved in writing by the Planning Authority. Thereafter the agreed details shall be fully implemented prior to the site becoming operational, unless otherwise agreed in writing. Reason: To ensure the site is adequately drained and does not increase the likelihood of flooding within and beyond the site
- 8. No development shall commence until a scheme of decommissioning and restoration of the site including aftercare measures has been submitted for the written approval of the Planning Authority. The scheme shall set out the means of reinstating the site to agricultural use following the removal of the components of the development. The applicants shall obtain written confirmation from the Planning Authority that all decommissioning has been completed in accordance with the approved scheme and the scheme shall be implemented within 12 months of the final date electricity is exported from the site.

Reason: In to ensure that the site is satisfactorily restored following the end of the operational life of the development in the interests of the amenity of the area.

9. No development shall commence until full details of the proposed lighting for the development and an impact assessment of obtrusive light from the development have been submitted to and approved in writing by the Planning Authority. All lighting shall be provided and thereafter retained in accordance with the approved scheme.

Reason: In order to minimise the amount of obtrusive lighting from the development in the interests of the residential and visual amenity of the surrounding area.

10. Noise levels emitted by any plant and machinery used on the premises should not exceed Noise Rating Curve NR20 between the hours of 2300 – 0700 and NR30 at all other times when measured within any noise sensitive dwelling (windows can be open for ventilation). The noise emanating from any plant and machinery used on the premises should not contain any discernible tonal component. Tonality shall be determined with reference to BS 7445-2.

Reason: In order to protect the residential amenity of nearby properties.

11. No works in connection with the development hereby approved shall be undertaken during the breeding bird season (March to August), unless in strict compliance with a Species Protection Plan for breeding birds, including provision for pre-development supplementary survey, that shall be submitted to and approved in writing by the Planning Authority. Thereafter, the development shall be carried out in complete accordance with the approved Species Protection Plan for breeding birds.

Reason: To protect the ecological interest in accordance with Local Development Plan policies EP2 and EP3. 12. No development shall commence until a proportionate Biodiversity Enhancement Plan has been submitted to and approved in writing by the Planning Authority. Thereafter, the development shall be carried out in complete accordance with the approved Biodiversity Enhancement Plan. Reason: To protect the ecological interest in accordance with Local Development Plan policies EP2 and EP3.

Informatives

With reference to Condition 5 it is recommended that:

- 1. Specification for access surfacing: 40mm of 14mm size close graded bituminous surface course to BS 4987 laid on 60mm of 20mm size dense binder course (basecourse) to the same BS laid on 350mm of 100mm broken stone bottoming blinded with sub-base, type 1.
- 2. Junction radius to be kerbed using 125mm by 255mm 45 degree splay kerbs.
- 3. It should be borne in mind that only contractors first approved by the Council may work within the public road boundary.

TITLE

APPROVED DRAWING NUMBERS

ECB-02 ECB01 ECB02 ECB04 ECB05 ECB06 ECB07 1 ECB07 2 ECB08 ECB09 ECB10 ECB11	Location Plan Aerial Plan Site Plan Existing Site Plan Proposed Site Plan Cross Section Elevations Elevations Floor Plan Roof Plan Fencing Site Access
ECB11	Site Access

Approved by

Name	Designation	Signature
lan Aikman	Chief Planning Officer	

The original version of this report has been signed by the Service Director (Regulatory Services) and the signed copy has been retained by the Council.

Author(s)

Name	Designation
Scott Shearer	Peripatetic Planning Officer

