

GLOUCESTER CITY COUNCIL

COMMITTEE : **PLANNING**

DATE : **4TH APRIL 2017**

ADDRESS/LOCATION : **LAND EAST OF HEMPSTED LANE**

APPLICATION NO. & WARD : **16/01055/FUL
WESTGATE**

EXPIRY DATE : **1ST NOVEMBER 2016**

APPLICANT : **THE SYLVANUS LYSONS CHARITY
TRUSTEES**

PROPOSAL : **Engineering operation to construct
balancing pond(s) and associated
landscaping**

REPORT BY : **ADAM SMITH**

**NO. OF APPENDICES/
OBJECTIONS** : **SITE PLAN**

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1 The site is situated on land to the east side of Hempsted Lane immediately north of The Gallops. This Council land comprises the north eastern corner of the roughly rectangular field enclosed by Hempsted Lane to the west, The Gallops to the east, the sports ground and playground to the north and the residential development of Court Gardens and Bridle Court to the south beyond the footpath. Members may recall that an application for the residential redevelopment of part of this field for up to 50 dwellings has a committee resolution to grant outline permission. The current application site was not included in the residential application. Further east beyond the application site are the playing fields adjacent to the Secunda Way bypass while immediately to the north is a path that links Hempsted Lane to the west and the playing fields to the east.
- 1.2 The land is currently an open grassed field with a path running through it between The Gallops and the path to the north. Levels decline towards the north east corner of the field. The proposal is for the construction of balancing ponds designed to serve the residential development of the adjacent part of the field, and associated landscaping.
- 1.3 The scheme comprises of a short section of swale (fed from a piped system to the south) into a pond on the west side of the path (which is retained), which links under the path to a smaller pond on the east side of the path. From here

the pond connects with a hydrobrake into the existing ditch network through the playing fields. A further pipe is proposed into the ditch further south. The works would take up about one third of the Council land.

- 1.4 The application is referred to the planning committee as it involves Council land and is subject to representations.

2.0 RELEVANT PLANNING HISTORY

Adjacent land – 13/01032/OUT

- 2.1 Outline planning application for residential development of site, open space including orchard, cycleways, footpaths, and associated works. Means of access offered for approval (layout, scale, appearance and landscaping reserved for future consideration). Pending consideration with resolution to grant permission subject to conditions and the completion of a Section 106 Agreement (affordable housing, open space, education and libraries).

3.0 PLANNING POLICIES

- 3.1 The following planning guidance and policies are relevant to the consideration of this application:

Statutory Development Plan

- 3.2 The statutory Development Plan for Gloucester remains the partially saved 1983 City of Gloucester Local Plan ("1983 Local Plan").

- 3.3 Paragraph 215 of the National Planning Policy Framework ("NPPF") states that *'...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given.'*

- 3.4 The 1983 Local Plan is more than thirty years old and, according to the Inspector who dealt with an appeal relating to the Peel Centre, St. Ann Way (13/00559/FUL), *'...its sheer ages suggests it must be out of date...'* (par. 11 of the Inspector's report). Members are advised that the 1983 Local Plan is out-of-date and superseded by later planning policy including the NPPF.

Central Government Guidance - National Planning Policy Framework and Planning Practice Guidance

- 3.5 This is the latest Government statement of planning policy and is a material consideration that should be given significant weight in determining this application. In assessing and determining applications, Authorities should apply the presumption in favour of sustainable development. For decision-making, this means:

- approving development proposals that accord with the development plan without delay; and

- where the development plan is absent, silent, or relevant policies are out of date, granting planning permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or
 - specific policies in the NPPF indicate development should be restricted.

Paragraph 103 of the NPPF requires Authorities to ensure that flood risk is not increased elsewhere and in areas at risk of flooding requires development to be appropriately flood resilient and resistant, and gives priority to the use of sustainable drainage systems.

The Practice Guidance provides further advice. Sustainable drainage systems are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible. They provide opportunities to reduce the causes and impacts of flooding; remove pollutants from urban run off at source; and combine water management with green space with benefits for amenity, recreation and wildlife. It also advises that developers need to ensure their design takes account of construction, operation and maintenance requirements of the components.

Planning obligations and conditions

Planning obligations should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonable related in scale and kind to the development.

Planning conditions should only be imposed where they are

- Necessary;
- Relevant to planning and to the development to be permitted;
- Enforceable;
- Precise; and
- Reasonable in all other respects.

Emerging Plans

On adoption, the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and Gloucester City Plan will provide a revised planning policy framework for the Council. In the interim period, weight can be attached to relevant policies in the emerging plans according to

- The stage of preparation of the emerging plan
- The extent to which there are unresolved objections to relevant policies; and
- The degree of consistency of the relevant policies in the emerging plan to the policies in the National Planning Policy Framework

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (Main Modifications Version, February 2017)

The Council has prepared a Joint Core Strategy with Cheltenham and Tewkesbury Borough Councils (JCS) which was submitted for examination on 20 November 2014. The Inspector published her Interim Findings in May 2016 and the JCS authorities have now approved Main Modifications to the plan for consultation. Consultation took place in February/March 2017 and further examination hearings are expected to take place June/July 2017.

The JCS has therefore reached a further advanced stage, but it is not yet formally part of the development plan for the area and the weight that can be attached to each of its policies will be subject to the criteria set out above, including the extent to which there are unresolved objections.

The following policies in the JCS are of relevance and the plan is subject to representations through the consultation which affects the weight that can be attributed to the policy;

SD1 – Presumption in favour of sustainable development

SD5 – Design requirements

SD7 - Landscape

SD9 – Historic environment

SD10 – Biodiversity and geodiversity

SD15 – Health and environmental quality

INF1 – Transport Network

INF3 – Flood risk management

INF4 – Green infrastructure

INF5 – Social and community infrastructure

INF7 – Infrastructure delivery

INF8 – Developer contribution

Gloucester City Plan

The Draft Gloucester City Plan and “call for sites” was subject to consultation January and February 2017. The Plan is at an early stage and therefore carries limited weight.

Gloucester Local Plan, Second Stage Deposit 2002

3.6 Regard is also had to the 2002 Revised Deposit Draft Local Plan. This has been subjected to two comprehensive periods of public and stakeholder consultation and adopted by the Council for development control purposes. This cannot be saved as it is not a formally adopted plan, however with it being adopted for development control purposes it is still judged to be a material consideration, albeit of limited weight.

3.7 Members are advised that the following “day-to-day” development management policies, which are not of a strategic nature and broadly accord with the policies contained in the NPPF, should be given some weight:

LCA.1 – Development within Landscape Conservation Areas

FRP.1a – Flood risk

FRP.6 – Surface water run-off

FRP.10 – Noise

FRP.11 – Pollution

B.7 – Protected species
BE.4 – Criteria for the layout, circulation and landscape of new development
BE.5 – Community safety
BE.12 – Landscape schemes
BE.21 – Safeguarding of amenity
BE.31 – Preserving sites of archaeological interest
BE.32 – Archaeological assessment
BE.33 – Archaeological field evaluation
BE.34 – Presumption in favour of preserving archaeology
BE.36 – Preservation in situ
BE.37 – Recording and preserving archaeology
TR.31 – Road safety
SR.2 – Playing fields and recreational open space

All policies can be viewed at the relevant website address:- Gloucester Local Plan policies – www.gloucester.gov.uk/planning; and Department of Community and Local Government planning policies - www.communities.gov.uk/planningandbuilding/planning/.

4.0 CONSULTATIONS

- 4.1 The Drainage Engineer raises no objection to the amended scheme.
- 4.2 The Lead Local Flood Authority raises no objection on the basis that this proposal will not increase the runoff rate and volume from the site, and the ponds have sufficient storage capacity for the adjacent residential development service, subject to conditions to secure the detailed design for the landscaping, associated structures and pipes, and a maintenance scheme.
- 4.3 Severn Trent Water raises no objection subject to a condition to secure approval and implementation of drainage plans for foul and surface water flows.
- 4.4 The Landscape Architect raises no objection but requests that some of the planting proposed is altered in the interests of appropriateness (e.g. not plants for standing water where it will be dry for the majority of time) and maintenance.
- 4.5 The Neighbourhood Services Manager raises no objection.
- 4.6 The City Archaeologist seeks a condition to secure an archaeological watching brief.
- 4.7 The Tree Officer raises no objection but seeks details of tree pits and a condition to maintain landscaping for 5 years.
- 4.8 The Highway Authority comments on the construction access are awaited.

5.0 PUBLICITY AND REPRESENTATIONS

5.1 12 neighbouring properties were notified and a site notices was published. A further consultation was held on the amended plans.

5.2 3 representations have been received and may be summarised as follows:

The applicant does not own the land on which the construction is proposed. The residents of Hempsted, as “owners” of the land, must be specifically consulted about whether or not it should be used in this way.

Plans refer to third party ownership – why if the Council claim ownership?

Builders should provide such facilities on their own property and maintain them.

Residents should not lose the use of recreation ground to enable builders to maximise profits. Not Council’s duty to provide the land

Developer should be required to maintain the area in perpetuity, not the tax payer

The applicant has not addressed the future maintenance and associated cost in any detail. Future affordability must be a material consideration to be taken into account as part of the planning committee’s deliberations. If the cost of future maintenance places an unacceptable financial burden on the City Council taxpayers the application should not be approved. Therefore accurate estimates of the likely future costs must be provided up front.

Calculation of runoff rates and volume are invalid. The development for which the proposed balancing pond will service has only received outline permission and final details are still to be confirmed; therefore calculation of runoff rate and volume from the site cannot be determined until full permission is given and detailed information is available.

The applicants suggestion that “Regard must also be had to the 2002 Revised Deposit Draft Local Plan which, whilst not adopted, nevertheless acts as a material consideration” should not be accepted. If elements of the Draft Local Plan are admissible to support an application then they must also be admissible to support objections. The planning authority must be clear and consistent about what is and what is not admissible.

Will the sewerage system cope with extra capacity? Pipes in Secunda Way overflow into the road on a fairly frequent basis already.

Would water become stagnant and cause smell and attract mosquitoes?

There should be a full risk assessment as to the safety of such a water feature given the variation in water levels and proximity of the children’s play area. If it

finds a hazard the proposal is not acceptable. In that context the proposal would result in loss of useable public open space contrary to planning policy for protecting the loss of open space

No account taken of possible impacts from cesspit to south of site serving Manor Farm House.

- 5.3 The full content of all correspondence on this application can be inspected at Herbert Warehouse, The Docks, Gloucester, prior to the Committee meeting.

<http://planningdocs.gloucester.gov.uk/default.aspx?custref=16/01055/FU>
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6.0 **OFFICER OPINION**

- 6.1 It is considered that the main issue with regards to this application are as follows:

- Principle
- Drainage
- Landscaping and design
- Residential amenity
- Archaeology
- Highways

Principle – allocation and current use

- 6.2 The site is allocated as Landscape Conservation Area in the 2002 plan and there appears to be a longstanding theme of seeking to protect these fields on the east side of Hempsted Lane through the LCA designation. I have previously set out in my committee report on the adjacent residential scheme the limited weight that can be given to the policy and that this approach to landscape considerations isn't supported in the NPPF anymore.
- 6.3 In any respect the policy seeks to restrict development that would detract from the particular landscape qualities and character of Landscape Conservation Areas, and I do not consider that the proposals would do this. In similar terms the proposals are also considered acceptable against the emerging JCS policy on landscape; SD7. There is therefore no objection against these policies.
- 6.4 In terms of Policy SR.2 of the 2002 Plan, this seeks to oppose proposals involving the loss of playing fields, formal and informal recreational open space unless certain criteria are met. The site currently provides an amenity value. It is not laid out to formal pitches or the like. As set out in the Planning Practice Guidance, Sustainable Urban Drainage combines water management with green space benefits for amenity, recreation and wildlife. Therefore the proposal complies with Policy SR.2 as it would not preclude the use of the land for informal recreation.

- 6.5 On other matters of principle, concern about the ownership of the land is raised in representations. Planning decisions are made on the basis of the site and case merits, not the ownership. If an owner refuses consent to use the land, then that will prevent development, regardless of the planning decision.

Drainage

- 6.6 Several amendments have been made to the proposals following the detailed advice of the Council's Drainage Officer. The Drainage Officer is now satisfied with the amended proposals. The proposed controlled peak discharge rate from the basin of 9.15 l/s is an appropriate figure, and is based on the QBar greenfield runoff rate. This runoff rate should ensure that the proposed development does not increase flood risk elsewhere.
- 6.7 The receiving ditches need to be cleared and proven, and a maintenance allowance included within the commuted sum (the commuted sum could be secured through the s106 agreement for the residential development if Members agree to it – as set out in the update report for application ref. 13/01032/OUT also on this agenda). For the main ditch, this applies down to the point at which it flows under the bypass. The same applies to the length of ditch which the new 'cut-off' channel now connects to. The applicant has agreed to fund the initial clearance of these ditches and we are advised that this payment will be contained within the easement / access agreement. The applicant has agreed to fund the appropriate ongoing maintenance of these ditches via the commuted sum. The Drainage Officer has sufficient confidence that the receiving ditch network has adequate intrinsic capacity to accommodate the proposed flows. Furthermore, the agreed conditions for the residential scheme 13/01032/OUT include a condition requiring approval of details for the disposal of surface water, which gives further control over approving the drainage solution anyway via this means. The swale has been modified to ensure that it no longer occupies such a large part of the open space. I am satisfied that the Drainage Officer's analysis deals with the concerns raised in representations.
- 6.8 The Drainage Officer considers that we have sufficient detail in the application and also that a SuDS maintenance condition as sought by the LLFA is not required because Gloucester City Council will be responsible for maintaining the SuDS features. I consider however given the outline nature of the associated residential scheme that there should be some provision by condition for a refinement of the precise drainage arrangements to allow a reasonable degree of flexibility and to secure precise levels, etc, and suggest a condition to secure drainage details. Subject to this, the proposal is considered to comply with the above policy context in terms of drainage and no objection is raised.

Landscaping and design

- 6.9 As already noted I do not consider that the proposals would harm the landscape character of this part of the field. Indeed I consider it would add interest and variation. The proposed basin design is appropriate for the open space setting; it is adequately naturalistic, maintainable, and should enhance

biodiversity. The proposals include new planting varieties within and at the edge of the basins. The Landscape Officer has sought some final tweaks to the planting proposals in terms of the species and this can be secured by condition if the applicant does not do so prior to determination.

- 6.10 Officers had earlier raised concerns about an implied substantial change in levels between the basin and the adjacent residential site (in the indicative plan for the residential scheme this area is shown as a road). We have sought to move away from this to avoid problems in future whereby the resultant 'raised up' development could be objectionable in terms of visual appearance and impacts on amenity for neighbouring residents. This has been resolved by the applicants' commitment to the use of a foul pumping station. Moving away from a gravity solution means that the levels of the roads will be broadly in line with the existing ground levels and this is shown on the submitted cross section drawings.
- 6.11 The proposal complies with the above policy context in terms of design and landscaping and no objection is raised in these terms.

Residential amenity

- 6.12 Given the nature of the proposal it is unlikely to cause any harm to residential amenities. A limitation on times of construction is proposed by condition to limit this impact. Subject to this the proposal complies with the applicable policy and no objection is raised.

Archaeology

- 6.13 The works have the potential to damage or destroy any archaeological remains that may present. Given that archaeological remains have been found to the west and northwest of the site there is a concern that previously undiscovered archaeological remains may be present, and that any such remains would be damaged or destroyed by the proposed works. As such it is recommended that a programme of archaeological mitigation should be undertaken to record any archaeological remains and finds which may be adversely affected by the proposed development, and can be secured by condition. Subject to this the proposal complies with the above policy context and no objection is raised.

Highways

- 6.14 The proposals are unlikely to generate any significant increase in traffic, maintenance visits would be the main component which would effectively be an upgrade on the maintenance of the open space as existing.
- 6.15 I have however sought the Highway Authority's agreement to construction traffic arrangements to check they are satisfied. In terms of the current access for the mower to get onto site this takes place from Hempsted Lane via the east/west path to the north of the site. This is unlikely to be suitable for construction traffic, while the access off The Gallops is a bollarded footpath. As the pond scheme is unlikely to take place without the residential scheme, the logical construction route would be via the new residential access off Hempsted Lane.

- 6.16 A construction management plan is considered necessary by condition. I also suggest a condition to require that the construction traffic is only taken via the new residential access. The applicant has agreed in principle to this.
- 6.17 I do not perceive any reasons to refuse planning permission on highways grounds. The residual cumulative impact on the highway would not be severe. There is however a desire to obtain the Highway Authority's agreement to the construction traffic arrangements, which is awaited. Conditions may be refined or added to on this basis.

Other matters

- 6.18 The Council may wish to undertake risk assessments before sanctioning the use of its land. However from a planning perspective I cannot see that there is a public safety reason to withhold planning permission. Attenuation basins are commonplace on development sites now, including in the vicinity of play areas. It appears to be no different from other public areas with ponds, lakes, rivers, canals and docks most of which have a far more substantial body of water. For much of the time the basins will contain a limited amount of water, and the scheme has been considered in conjunction with the Council's Landscape Architect who manages open spaces. The introduction of protective railings or the like would be undesirable in terms of maintaining the aesthetic of the area.
- 6.19 There are no ecological concerns with the works and they are likely to lead to an enhancement of biodiversity that weighs in favour of the application.
- 6.20 One representation is concerned about the consistent applicability of the 2002 Plan policies but does not state any specific issue. The policies of that plan are applied with the appropriate weight as set out above.
- 6.21 I have discussed with colleagues about the cess pit serving Manor Farm House that is raised in a representation. If it is a cess pit then it will get emptied. If it were to significantly overflow and cause a pollution incident then it is expected that the impact on the new properties would be far more of a concern than the application proposal. Given its current presence, assumed maintenance of it, and the nature of the proposals, I cannot see that this would be a reason to withhold planning permission.

7.0 CONCLUSION

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 7.2 The proposal would comply with the policy context cited above subject to certain conditions. There are no material considerations that indicate that planning permission should be refused.

8.0 RECOMMENDATIONS OF THE DEVELOPMENT CONTROL MANAGER

- 8.1 That planning permission is granted subject to the following conditions with delegated authority given to the Head of Planning to amend, delete or add conditions in light of the Highway Authority's observations;

Condition

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason

To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

Condition

The development shall be undertaken in accordance with the drawings (inasmuch as they relate to land within the application site) on the plans referenced;

FRA SK100 Rev. B Proposed Surface Water Attenuation Feature

LS-01 Rev. C – Detailed Landscape Proposals Sheet 1 of 2

LS-02 Rev. C – Landscape sections

FRA SK3 Rev. A – Illustrative Headwall Detail

received by the Local Planning Authority 23rd February 2017, except where otherwise required by conditions of this permission.

Reason

To ensure the works are carried out in accordance with the approved plans.

DESIGN/LANDSCAPING

Condition

Any associated above ground infrastructure (enclosures, fixtures, etc) shall be installed only in accordance with scaled drawings that have been submitted to and approved in writing by the Local Planning Authority.

Reason

In the interests of protecting the visual appearance of the area, in accordance with Policy SD5 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017, Paragraph 58 of the National Planning Policy Framework and Policies BE.4 and BE.12 of the Second Deposit City of Gloucester Local Plan (2002).

Condition

Notwithstanding that indicated on the submitted plans, soft landscaping shall be implemented only in accordance with a landscape scheme that has been submitted to and approved in writing by the Local Planning Authority. The submitted design shall include scaled drawings and a written specification clearly describing the species, sizes, densities and planting numbers. Drawings must include accurate details of all existing trees and hedgerows with their location, species, size, condition, any proposed tree surgery and an indication of which are to be retained and which are to be removed.

Reason

In order to protect the visual amenities of the area in accordance with Policy SD5 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017, Paragraphs 17 and 58 of the National Planning Policy Framework and Policies BE.4 and BE.12 of the Second Deposit City of Gloucester Local Plan (2002).

ARCHAEOLOGY

Condition

No development or groundworks shall take place within the proposed development site until the applicant, or their agents or successors in title, has secured the implementation of a programme of historic environment work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. The programme will provide for archaeological monitoring and recording (a 'watching brief') during ground works related to the development proposal, with the provision for appropriate archiving and public dissemination of the findings.

Reason

The proposed development site has potential to include significant elements of the historic environment. If present and revealed by development works, the Council requires that these elements will be recorded during development and their record made publicly available, in accordance with paragraph 141 of the National Planning Policy Framework, Policy SD9 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017 and Policies BE.36, BE.37 & BE.38 of the Gloucester Local Plan (2002 Second Stage Deposit). This is necessary pre-commencement due to the potential impact from early phase works on significant assets.

DRAINAGE

Condition

Notwithstanding those details submitted with the application, the development hereby permitted shall not commence until precise details for the disposal of surface water (demonstrating sufficient capacity to accommodate specified surface water flows into it) have been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented.

Reason

To ensure that the development is provided with a satisfactory means of drainage, to reduce the risk of creating or exacerbating a flooding problem in accordance with Policy INF3 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017, the NPPF and Policies FRP.1a and FRP.6 of the City of Gloucester Second Deposit Local Plan 2002. This is required pre-commencement given the influence of early-stage below ground arrangements on the whole development.

AMENITY

Condition

Construction work and the delivery of materials shall be limited to the hours of 0800 hours to 1800 hours Monday to Friday, 0800hours to 1300hours on Saturdays and no construction work or deliveries shall take place on Sundays or Bank Holidays.

Reason

To safeguard the amenities of the area in accordance with Policies FRP.9, FRP.10, FRP.11 and BE.21 of the 2002 City of Gloucester Second Deposit Local Plan, Policy SD15 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017 and Paragraphs 17, 109, 120 and 123 of the NPPF.

HIGHWAYS

Condition

The access for construction traffic shall be from Hempsted Lane via the development of the adjacent field to the west of the application site in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority, and there shall be no other access to the site for construction traffic.

Reason

To provide for a suitable construction traffic access in the interests of highway safety in accordance with paragraph 32 of the National Planning Policy Framework and Policy INF1 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017.

Condition

No development shall take place until a Construction Method Statement has been submitted to and approved in writing by the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall:

- i. specify the type and number of vehicles;
- ii. provide for the parking of vehicles of site operatives and visitors;
- iii. provide for the loading and unloading of plant and materials;

- iv. provide for the storage of plant and materials used in constructing the development;
- v. provide for wheel washing facilities;
- vi. specify the intended hours of construction operations;
- vii. specify measures to control the emission of dust and dirt during construction
- viii. specify a vehicle routing strategy including Banksmen and hours of operation with regard to peak hours of the adjacent road network

Reason

To reduce the potential impact on the public highway and accommodate the efficient delivery of goods and supplies in accordance with the National Planning Policy Framework and Policy INF1 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy Main Modifications Version 2017.

Decision:

Notes:

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Person to contact: Adam Smith
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