

DELEGATED DECISION REPORT

Application Reference Number	21NP0059	
Description / Site Address Construction of a planetarium building, Twice Brewed		
	Bardon Mill, Hexham, Northumberland, NE47 7AN	
Expiry date of publicity / consultations 18 August 2021		
Last date for decision	16 September 2021	

Details of Proposal

This application is seeking permission for the construction of a planetarium building at the Twice Brewed Inn. The building will be used for the purpose of educating tourists on the night sky and astronomy. The Twice Brewed Inn is a hotel/pub located to the south of the B6318 Military Road, in the south of the National Park. The site is located immediately to the west of The Sill: National Landscape Discovery Centre. The site lies within the buffer zone of the UNESCO World Heritage Site 'Frontiers of the Roman Empire-Hadrian's Wall'. Two Scheduled Ancient Monuments are in close proximity to the site. The Vallum runs directly north of the site and the Twice Brewed Roman Temporary Camp runs to the south of the site. The property of West Twice Brewed, directly to the west of the site, is Grade II Listed.



Figure 1: Site location



The applicant seeks permission for the construction of a planetarium. The detached building would be located directly to the east of the Twice Brewed Inn within the curtilage of the main building. The building would be 12.1m in length, 9.1m in width and 5.6m in height. The building would be constructed in a mixture of timber and aluminium glazing with a pitched slate roof.

Planning Policy & Guidance

National Policies

National Planning Policy Framework (NPPF) (2021) National Planning Practice Guidance

Northumberland National Park Local Plan

Policy ST1	Sustainable Development
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Policy ST2	General Development Principles
Policy ST4	Spatial Strategy
Policy DM7	Rural economy and diversification
Policy DM9	Transport and Accessibility
Policy DM10	Habitats, Biodiversity and Geodiversity
Policy DM11	Landscape, Tranquillity and Dark Night Skies
Policy DM14	Historic Landscape Assets and Built Heritage
Policy DM15	Archaeological Heritage

Supplementary Planning Guidance

NNPA Building Design Guide Supplementary Planning Document (Design Guide SPD) NNPA Landscape Supplementary Planning Document (Landscape SPD)

Relevant Planning History

21NP0062	Construction of an extension to the existing brewhouse to provide storage and loading space <i>Pending Consideration</i>
21NP0033	Construction of a 2 bedroomed single storey timber cabin for holiday let use to provide overspill accommodation ancillary to existing hotel accommodation <i>Planning permission granted conditionally 15 July 2021</i>
21NP0029	Retrospective application for the installation of a night sky observatory <i>Planning Permission Granted Conditionally 25 May 2021</i>
19NP0114	Construction of glazed sunroom extension at Twice Brewed Inn, Bardon Mill, Hexham, Northumberland, NE47 7AN Planning Permission Granted Conditionally 5 February 2020



18NP0087	Change of use of land to campsite accommodating up to		
10111 0007	20no. pitches	Planning permission refused 22/11/2018	

17NP0028 Proposed new access into the car park (withdrawn by

applicant)

16NP0103 Construction of extension to public house for microbrewery

(approved with conditions, 22/12/16)

15NP0063 Change of use of part of dining room to be used as a

temporary visitor information point and ancillary sales

(approved with conditions, 29/09/15)

03NP0007 Construction of porch/bus shelter (approved with

conditions, (15/04/03)

73NP0132 Extension (approved with conditions)

70NP0068 Extension of hotel and restaurant (approved with conditions)

Consultation/Representations

Henshaw Parish Council: No Response Received

NCC Highways: No Objection The proposed development will utilise existing access and parking arrangements that serve Twice Brewed Inn. This will not lead to concerns with regards to highway safety as the existing measures have been assessed as part of previous applications.

Historic England: No Objection: We have also considered the impact on the setting of the monument. Due to the nature of the development, the use of natural materials, and the existing nature of this area – with comparable educational structures and tourist services between the Twice Brewed Inn and The Sill – Historic England will not be objecting to the proposal on the grounds of setting.

NNPA Historic Environment Officer: No Objection

NNPA Visitor Development Officer: No Objection

Public response: The application has been advertised by means of a site notice displayed on the 28 July 2021. No representations have been received in response.

Assessment

The key material planning considerations are:

- The principle of the development;
- Design and amenity;
- Impact Upon National Park special qualities
- Highways



Utilities

The principle of the development

Sustainable Development

The National Planning Policy Framework (NPPF) places emphasis on a presumption in favour of sustainable development to guide decision making. Policy ST1 of the Local Plan adopts a similar assumption in favour of sustainable development and defines the qualities and criteria which are deemed to represent 'sustainable development'. Paragraphs a), c), d), h) & l) are of specific relevance as the policy requires proposals to 'make the National Park a high-quality place to live and work', 'contribute positively to the built environment by having regard to the site context', 'protects or enhances the landscape character', 'Improve public access to, and enjoyment of, the National Park's special qualities' and 'conserves or enhances the historic environment'. The degree to which the proposals accord with these qualities is discussed throughout the report.

Location of Development

Policy ST4 of the Northumberland National Park Local Plan seeks to direct development to a series of settlements named within the policy. Twice Brewed is not one of the named settlements within the policy and therefore it is considered to fall within the open countryside. Policy ST4 lists a number of criteria in which development would be permitted within the open countryside.

Paragraph 2 b) of Policy ST4 states that Development will be permitted in the Open Countryside 'where there is an essential need for development to meet the needs of tourism'. The applicant has submitted a justification for the development of the planetarium as part of the Design & Access and Heritage Statement submitted in support of the application. The justification states that the Twice Brewed Inn has currently been taking advantage of the Inn's location within the Northumberland International Dark Sky Park by offering a range of Stargazing Events which broaden the scope of activities available at the pub and in so doing extend the visitor season beyond the summer months when visitor and guest numbers currently fall dramatically. Dark sky events are particularly suited to the winter months when the nights are longer and darkness falls earlier and they will help to maintain occupancy of the facilities and reduce the number of seasonal staff who have to be laid off at what is currently a much quieter time of year. Additional attractions at the Twice Brewed Inn site would complement the existing visitor offer in this part of the Northumberland National Park, particularly outside the most popular summer season, and would support the enhancement and future growth of the area.

It is considered the planetarium would provide a useful tourist facility to educate individuals on the National Park's special qualities without detracting from the high-quality environment it would form part of. This justification is considered reasonable and given this proposal would complement the other building uses on site already, the proposal would satisfy the aims and objectives of Policy ST4 of the Local Plan.

Local Plan Policy ST4 also encourages proposals which are 'supported by other relevant Local Plan policies'. Local Plan Policy DM7 supports development that contributes to the economic and social



wellbeing of local communities. Development will be permitted if the proposal accords to one or more of the criteria set out within part 1 of Policy DM7. Paragraph 1 a) states that development is acceptable if 'it promotes and protects existing businesses by providing flexibility for established rural businesses to diversify and expand'. As described in detail above, the proposed planetarium would allow the Twice Brewed Inn to expand their tourism offer on site during winter months in which bookings and visitor footfall usually drops significantly. The proposal would act to secure the future sustainability of the business by ensuring regular visitors would make visits to the area throughout the calendar year. As a result of this, it is considered that the proposal would accord with part 1 of Policy DM7 of the Local Plan.

Local Plan policy DM7 also encourages development that promotes tourism and recreation within the National Park ensuring they meet a set criteria. Part 4 relates to proposals for tourism and recreation development. The policy sets out four criteria that tourism and recreation developments must adhere to, in order to comply with policy DM7. It is considered the planetarium complies with the requirements as;

- A) They conserve and enhance the natural beauty, wildlife, tranquility and cultural heritage of the National Park. The proposal conserves the above written factors and actively encourages individuals to enjoy the tranquil features of the night sky. This is highlighted in detail within the ecology, cultural heritage, landscape and tranquility sections of the report.
- B) They provide and protect opportunities for people to increase their awareness, understanding and enjoyment of the special qualities of the National Park in a manner that will not undermine the enjoyment of those qualities by other visitors or the quality of life of residents. As the building is used for the purposes of educating individuals about the night sky, this would provide an opportunity for individuals to increase their awareness, understanding and enjoyment of the tranquility of the night sky. As a result of this, it is considered that the proposal would comply with this paragraph.
- C) They are of a quality, scale and design that takes into account and reflects the sensitivity of the local landscape. The proposal is considered policy compliant in terms of its design. This is described in further detail in the design section below.
- D) They do not lead to unacceptable harm in terms of noise and activity (including traffic). The proposal would not lead to any unacceptable material amenity impacts. This is described in detail within the amenity section of the report.

Part 5 of Policy DM7 sets out that in the case of new buildings for tourism and recreation uses, development should be located within one of the settlements, or at least uses an existing building. While the development is not located within one of the named settlements paragraph c) of Part 5 states that 'new buildings for tourism and recreation will be permitted where it is within the open countryside but in accordance with Policy ST4'. As this has been established above and an essential need is accepted in these circumstances, the principle of development is therefore considered acceptable.



Design and Amenity

<u>Design</u>

Local Plan policy ST2 places an emphasis on ensuring new development is of high-quality design. Paragraph c) of Policy ST2 ensures development will be permitted where 'The siting, orientation, layout, scale, height, massing and density of the proposal are compatible with the existing built form'.

The applicant seeks permission for the construction of a planetarium. The planetarium would be 12.1m in length, 9.1m in width and 5.6m in height. The planetarium would be constructed in timber with a natural slate roof. Large anthracite grey powder coated aluminium glazing panels would be present on the western and northern elevations.

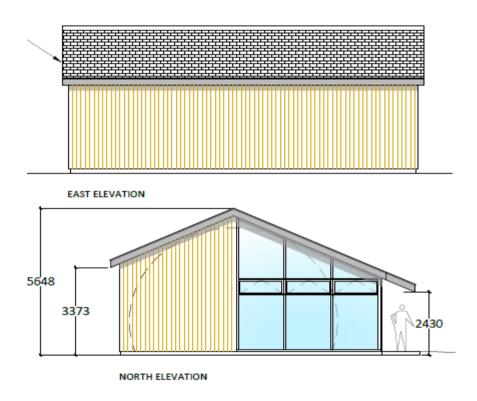


Figure 2: Proposed design of planetarium

The overall scale and design of the planetarium is considered appropriate for use as a tourist facility. The contemporary design in which one side of the eaves is 0.9m lower than the other is necessary in order to facilitate the planetarium screen. The glass faced northern elevation is also considered a contemporary addition when contrasted with the timber walls it would be situated next to. This modern form of design is considered appropriate and would reflect the existing high architectural standards of the surrounding area the planetarium would be located in. This is due to the planetarium's close proximity to the Sill: National Landscape Discovery Centre.

The siting of the planetarium is considered appropriate in terms of design. The planetarium would be located approximately 50m to the east of the existing brewery/pub building within an area of



recent concrete surfacing. This would ensure the planetarium can be read amongst the existing built development of the area namely the existing brewery building and The Sill.

The proposed materials would be considered appropriate in terms of design. The timber materials would allow the building to be read as an obvious tourist facility detached from the brewery/pub building. While the brewery building (of which the planetarium is ancillary to but not attached to) is constructed in stone, the provision of the planetarium in this material would be considered inappropriate. The timber and slate materials would retain similarity to the existing observatory which is located directly to the west of the application site. This ensures the proposal would harmonise with its surrounds.

Concrete paving would be located around the periphery of the planetarium to provide access to the building. This is considered a typical feature and would not warrant any material impacts in terms of design.



Figure 3: Application Site

While the planetarium would be clearly visible from the main public vantage point of both the Twice Brewed Car Park and the B6318 '*Military Road*' to the north, the scale of the building would ensure the proposal does not dominate over the existing brewery or the neighbouring Sill building and instead would remain subordinate.

There are a number of detached buildings (the recently approved overspill accommodation log cabin and the observatory) that would be in close proximity to this proposed building. However it is considered that the site is large enough to accommodate this further building. It is noted that this

area of the site has now almost reached its maximum capacity in terms of development and any further development within this area may cause harm to the area.

In light of the above assessment, it is considered that the proposals would accord with the requirements of Local Plan policies ST1, ST2 and the NPPF in relation to design.

Amenity

Amongst others, Policy ST2 states that development will be permitted where 'The proposal will not have an unacceptable adverse impact upon the amenities of adjoining occupiers'.

In terms of amenity, the proposed planetarium would be located approximately 30m from The Sill (which includes accommodation in the Youth Hostel element closest to the site) to the east. However, as can be seen in Figure 4, there is an area of existing planting which acts as a visual buffer between the planetarium and the youth hostel. This together with the height of the proposed building would mitigate any potential overshadowing/ loss of daylight or sunlight to The Sill.

The planetarium would be located 150m from West Twice Brewed to the west. This significant distance to both neighbouring properties would sufficiently mitigate any material impacts in terms of overlooking/loss of daylight and sunlight.



Figure 4: Application site, highlighting existing planting

Due to the planetarium's close proximity to the existing brewery/pub, it is considered that the addition of a tourist facility, which would operate within the hours of the pub/brewery, would not result in an unacceptable increase in noise above what is already emitted from the site. The pub's



opening hours run until midnight and there is already a level of existing noise when customers leave the venue at this time. The provision of a planetarium which would be an ancillary use to the existing pub is not expected to cause any significant additional noise to the current situation. However, it is considered necessary to restrict opening hours by condition to ensure no night events run that could cause concern to the residential accommodation nearby.

It is not considered that the proposal would result in a significant increase in traffic to the surrounding area.

As a result of this, it is considered that the proposal would not result in any additional material amenity impacts to neighbouring dwellings and therefore satisfies the aims and objectives of Policy ST2 of the Local Plan.

Impact upon National Park Special Qualities

Biodiversity

Local Plan policy DM10 states that the conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight with all development aiming to 'maintain and where appropriate enhance ecological features and recognised geodiversity assets'.

The proposal is not located within an ecologically sensitive area and it was not considered necessary to provide an ecological survey.

The proposed planetarium would be constructed on an area of existing concrete hardstanding. As a result of this, it is not considered that the proposal would result in the loss of any areas rich in ecological value.

A number of trees are in close proximity to the proposed site of the planetarium. The applicant has confirmed that 4 trees would be lost as a result of the development. They would be situated north of the existing concrete hardstanding and south of the existing car park (figure 5).



Figure 5: Trees to be Removed

Paragraph 2b) of Policy DM10 of the Local Plan requires proposals to 'Maximise opportunities to strengthen the integrity and resilience of habitats and species within the National Park and provide a net gain in biodiversity when possible'. As the proposal would result in the loss of four trees, the applicant has provided a site plan which highlights the planting of ten additional Rowan Trees as part of the proposal. The trees would be located to the eastern boundary of the site adjacent to The Sill. This is considered an appropriate location as there are already a number of trees in this location and additional trees would provide additional screening to mitigate any physical impact of the planetarium when considered from the east. The provision of a net increase of 6 trees would provide an example of biodiversity net gain and would therefore comply with policy DM10 of the Local Plan. As a result of this, it is not considered that any significant ecological habitats would be lost as a result of the development and therefore the proposal would comply with policy DM10 of the Local Plan.

Landscape

Policy DM11 states that the natural beauty and heritage of the National Park will be conserved and enhanced whilst being responsive to landscape change. To achieve this, new development will need to ensure that 'the visual impact of the development in its immediate and wider setting is minimised through high quality design that reflects local landscape character with particular regard to scale, siting, materials and colour' and 'the cumulative and/or sequential landscape and visual effect of development do not detract from the natural beauty of the National Park.



The planetarium would be located to the east of the existing brewery building. The building would be clearly visible when considered from the public vantage point to the north, namely the B6318 'Military Road'. It is generally appropriate for new buildings to be located in close proximity to existing buildings to limit the spread of development and to minimise any impact on local landscape character. Given the development's existing situation nearby both the neighbouring Sill building and the brewery/pub it is considered that the proposal would not result in an uncharacteristic form of development and would instead reflect the existing local landscape character. The building would be able to be clearly read as an ancillary feature to the existing brewery/pub/hotel building due to the material choice.

It is therefore considered that any impact on wider landscape or visual amenity would not be of a magnitude which would warrant refusal of the application and the proposals are considered to comply with the requirements of Local Plan policy DM11 or the NPPF in relation to landscape.

Tranquillity

Local Plan policy DM11 requires amongst others that 'The level of noise, traffic and light generated as a result of the development during construction and thereafter is minimised and dark night skies maintained' and 'All development proposals should avoid external lighting where possible. Where external lighting is necessary its design should avoid all unacceptable adverse impacts, or as a last resort mitigate them to...avoid adverse impacts on tranquillity, dark skies.'

The site is in a sensitive location within the Northumberland International Dark Sky Park. In terms of external lighting details, the applicant has confirmed that 'External lighting would be minimal and only at a level sufficient to secure health and safety. The only lighting unit associated with the proposal would be at the front door of the proposed building and would activate only when needed'.

Although some information has been provided, it is considered prudent to attach a condition restricting the installation of external lighting, as the planetarium is a detached building independent from the existing brewery/pub building. The condition would ensure any external lighting proposed would be dark sky compliant.

As the proposals would involve the development of a singular building within a large car park, it is considered that the proposals are unlikely to generate significant levels of additional vehicle movements/traffic or noise. As such, subject to the imposition of an appropriate condition relating to external lighting, it is considered that the proposals would be in accordance with the requirements of Local Plan policy DM11 and the NPPF in relation to tranquility.

Cultural Heritage

Local Plan policy DM14 states that 'Development affecting historic landscape assets of the National Park will be required to conserve and enhance landscape quality by taking into consideration the elements which contribute to its significance.' Policy DM14 also discusses the World Heritage Site and states that 'Development proposals that unacceptably harm the setting of the Frontiers of the Roman Empire: Hadrians' Wall World Heritage Site (WHS) will not be permitted. Proposals within



the extent of the WHS or its setting should, where possible, seek opportunities to sustain and better reveal the significance of its Outstanding Universal Value.

Local Plan policy DM15 refers to Archaeological Heritage. The policy requires 'Development that would result in harm to the significance of a Scheduled Monument or other nationally important archaeological site will not be permitted.'

The application site is located within the buffer zone of the World Heritage Site 'Frontiers of the Roman Empire- Hadrian's Wall' and is located directly north of a Scheduled Ancient Monument. West Twice Brewed, the nearest neighbouring dwelling to the west is a Grade II Listed Building. Due to the sensitivity of the site, the authority's Historic Environment Officer and Historic England has been consulted on the proposals.

Historic England confirmed that the area proposed for the planetarium is located adjacent to the section of monument known as 'The vallum between the road to Steel Rigg car park and the road in Caw Gap in wall miles 39, 40 and 41,' which runs parallel to the B6318 road, and north of the Scheduled area of Twice Brewed Roman temporary camp. As the proposed structure will not directly impact on an area of Scheduled Ancient Monument there is no need to apply for Scheduled Monument Consent.

Historic England have also considered the impact on the setting of the monument. Due to the nature of the development, the use of natural materials, and the existing nature of this area – with comparable educational structures and tourist services between the Twice Brewed Inn and The Sill, Historic England confirmed that they do not object to the proposal on the grounds of setting.

Historic England also confirmed that there may be some impacts here in relation to locally listed, or undesignated heritage assets. In this instance the issue of impacts on buried archaeological remains, and possible archaeological mitigation strategies, would be best addressed by the Northumberland National Park archaeological advisor. The Authority's Historic Environment Officer also confirmed that they raised no objection to the proposals.

West Twice Brewed, a Grade II Listed dwelling is located approximately 150m to the west of the application site. The considerable distance combined with the existing hotel/pub/brewery acting as a visual buffer would ensure that the proposal would have a negligible impact on the listed feature.

As a result of this, it is not considered that the proposed planetarium would cause harm to the designated heritage assets and, as a result, satisfies the aims and objectives of Policies DM14 and DM15 of the Local Plan.

Highways

Policy ST2 of the Local Plan requires proposals to 'ensure the proportionate creation of an accessible, safe and secure environment for all potential users with appropriate cycling facilities and car parking provision and without compromising highway safety'. Policy DM9 of the Local Plan requires proposals to 'protect and where appropriate enhance existing networks of Public Rights of



Way, National Trails, open access land and other access routes for us by pedestrians, cyclists and equestrians'.

Policy DM9 of the Local Plan requires proposals to 'ensure appropriate transport and accessibility needs are incorporated into new development proposals including provision of car parking and cycling provision.'

As the proposal would result in an intensification of the use of the Twice Brewed Inn site, Northumberland County Council as the competent highways authority has been consulted on the proposals.

Northumberland County Council Highways confirmed that the proposed development will utilise existing access and parking arrangements that serve Twice Brewed Inn. This will not lead to concerns with regards to highway safety as the existing measures have been assessed as part of previous applications. In addition, the proposed development will utilise all existing arrangements for car parking & cycle parking. No additional parking will be required for this development. As a result of this, it is considered that the proposal would meet the aims and objectives of policies ST2 and DM9 of the Local Plan.

Utilities

Foul Drainage

With regards to foul drainage, the planetarium would be connected to the existing network that already satisfactorily serves the pub/restaurant/hotel operations and the WC block located adjacent to the application site. The proposed development as a planetarium would generate a low level of additional demand on the foul drainage system and it is considered this can be accommodated within the existing network infrastructure.

Water Supply

In terms of water supply, the Design & Access and Heritage Statement explains that planetarium would be connected to the existing water supply at the site. This supply currently provides water for the existing brewery/pub/hotel operations. The supply already adequately supplies the existing operations. The supply would be extended to the planetarium which it is advised would place negligible additional demand on the supply. This is considered a reasonable solution.

Recommendation & Conditions

Grant conditional permission subject to the following conditions:

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



Reason: To ensure that the development is commenced within a reasonable period of time from the date of this permission, as required by Section 91 of the Town and Country Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).

- 2. The development hereby permitted shall be maintained in accordance with the following approved plans and documents:
 - Application Form received 20 July 2021
 - Design & Access and Heritage Statement received 20 July 2021
 - Existing Site Plan Dwg No: S01 received 20 July 2021
 - Proposed Site Plan Dwg No: S02 received 20 July 2021
 - Foul Drainage Assessment Form received 20 July 2021
 - Proposed Plans and Elevations Dwg No. P 101 received 20 July 2021
 - Car Parking Plan Dwg No S01A received 18 August 2021
 - Proposed Block Plan of development Dwg No. S02A received 18 August 2021
 - Proposed Tree Planting Plan Dwg No. S02B received 24 August 2021

Reason: For the avoidance of doubt, to enable the local planning authority to adequately manage the development and to ensure the proposal accords with policies ST1, ST2, ST4, DM7, DM9, DM10, DM11 & DM14 of the Northumberland National Park Local Plan and the National Planning Policy Framework (NPPF).

- 3. Prior to the fixing of any external lighting associated with the development, including any bollards proposed in the car park to support the development hereby approved, details of the external lighting shall be submitted to and agreed in writing with the Local Planning Authority. Details should include:
 - The specific location of all external lighting units;
 - Design of all lighting units;
 - Details of beam orientation and lux levels; and
 - Any proposed measures such as motion sensors and timers that will be used on lighting units.

The approved lighting scheme shall be installed in accordance with the approved details and shall be maintained as such during the operation of the development, unless removed.

Reason: In order to ensure that there is no harmful impact upon the tranquility and intrinsically dark character of Northumberland National Park and the Northumberland International Dark Sky Park through excessive light pollution, in accordance with Northumberland National Park Local Plan Policies ST2 and DM11 and paragraph 180 of the NPPF.

4. The replacement tree planting, as set out in Dwg No. S02B shall be carried out in the first planting season following the first use of the development hereby permitted. Any trees which



within a period of 5 years from the first use of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: In order to provide compensation and biodiversity net gain on the site, in the interests of the amenity and biodiversity of the area in accordance with Northumberland National Park Local Plan policies ST1, ST2 and DM12 and Chapter 15 of the NPPF

5. The development hereby approved shall only operate between the hours of 09.00 and 00.00 from Monday to Sunday.

Reason: To protect the amenity of neighbouring residents, in accordance with Northumberland National Park Local Plan Policy ST2

Informative Notes

- 1. This planning permission is granted in strict accordance with the approved plans. It should be noted however that:
- (a) Any variation from the approved plans following commencement of the development, irrespective of the degree of variation, may constitute unauthorised development and may be liable to enforcement action.
- (b) You, your agent, or any other person responsible for implementing this permission should inform the Local Planning Authority immediately of any proposed variation from the approved plans and ask to be advised as to the best method to resolve the matter. Most proposals for variation to the approved plans will require the submission of a new application.
- 2. This consent is granted subject to conditions and it is the owner and the person responsible for the implementation of the development who will be fully responsible for their compliance throughout the development and beyond. Some conditions may require work to be carried out, or details to be approved prior to the commencement of the development.

Where pre-commencement conditions are not complied with, the whole of the development could be unauthorised, and you may be liable to enforcement action. In some circumstances, the only way to rectify the situation may be through the submission of a new application. If any other type of condition is breached then you may be liable to a breach of condition notice.

Background Papers

Application File 21NP0059 **EIA Screening Report**

	Signature	Date
Planning Officer	A Ewart	09.09.2021
Head of Planning and Policy	Susannah Buylla	10/09/2021