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Dear Gareth,

OLD WOOD ENERGY PARK – 24/00161/FUL – APPLICATION UPDATE AND SUBMISSION OF FURTHER INFORMATION

A planning application for Old Wood Energy Park has been submitted to Rushcliffe Borough Council under application reference number 24/00161/FUL, validated on 16th February 2024. The application is for the construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling on Land west of Bradmore Road and north of Wysall Road, Land west of Wysall, Nottinghamshire.

Through 2024 the planning application has been subject to consultation and this has resulted in the need to make responses to some of these comments alongside minor changes to the design, landscape strategy and some of the technical reports. The key changes are set out below alongside a list of updated documents and plans which are submitted to the Council.

The design changes made are along the western boundary of the Site in response to a meeting with Nottinghamshire Wildlife Trust, where 552 solar panels have been removed to allow for the fencing to be moved eastwards to create a wider green connectivity corridor between the fence and the existing boundary vegetation. Previously this corridor was around 5 m in width but is now typically 15-20 m. There have been additional changes to the Landscape Strategy including additional planting and so the Biodiversity Net Gain Assessment has been updated in the EclA.

Comments received from the Council's Landscape Advisors and Historic England required the provision of an updated LVIA and supporting figures as well as a Response to Historic England Comments.

Towards the end of this letter we detail any key planning policy and material consideration changes since the submission of the planning application, which are considered pertinent to the application.

A summary of all updated/ new documents and plans submitted to the Council is provided at the end of the letter.

No Objection/ No Requested Information

In summary there are no objections/ requests for extra information from the following consultees:

- Active Travel England,
- Sport England,
- NCC Lead Local Flood Authority,
- NCC Public Right of Way,
- National Highways,
- Environment Agency,
- Notts Fire and Rescue Service,
- East Midlands Airport,
- Seven Trent Water,
- Natural England,
- Nottinghamshire Police,
- Network Rail,
- Environmental Health,
- Ecology and Sustainability Officer.

Previously Submitted Updated Information

Following comments from both National Highways and the Local Highways Authority an updated Transport Statement and CTMP were prepared and submitted in June 2024. These have been re-consulted by the Council and the updated comments have been received from National Highways who now raise no objection. However, updated comments from the Local Highways Authority are still awaited.

Further Updated Information

Landscape and Visual Impact Assessment

Following receipt of the Council's 3rd party independent review of the submitted LVIA, undertaken by Wynne-Williams Associates (WWA) and dated June 2024, Pegasus have undertaken additional work that was requested and this is set out in the updated Landscape and Visual Impact Assessment (October 2024). As detailed before there have been some minor alterations to the design along the western boundary and additional planting has been proposed. These changes and the comments raised in the WWA Landscape Review are addressed in the updated LVIA. For clarity a new plan has also been prepared illustrating the distances between public rights of way and the Development (WLL02A-EXG-04-00-D-K002-P02).

The WWA Landscape Review raised a number of queries with regards Pegasus' original LVIA. The key points raised are summarised as:

- The lack of assessment of landscape value with reference to Technical Guidance Note 02/21 Assessing the Value of Landscapes Outside National Designations, published by the Landscape Institute.
- The lack of reference to the photomontages prepared by The Landmark Practice in March 2024 (which was after the LVIA had been submitted).
- Inconsistencies in the assessment with the scale of effects underestimated.
- The lack of visual assessment upon views from Public Footpath Costock FP4 and Public Footpath Rempston FP8.
- Omission of cumulative schemes at screening and scoping stage.
- The lack of cumulative landscape character assessment.

- The lack of cumulative sequential visual assessment, including the promoted walks, particularly when considered in the context of the surrounding cumulative schemes.
- The lack of cumulative visualisations.

With regards the landscape value and sensitivity, the assessment is provided in Section 5, sub-heading 'Analysis of Landscape Sensitivity' of the updated LVIA (October 2024). This updated detailed assessment supports Pegasus' earlier conclusion that the local landscape is of medium sensitivity to the typology proposed. As part of the baseline research to the updated LVIA (October 2024), Pegasus has reviewed the Council's planning policies and guidance again and identified that following the submission of the Old Wood Energy Park planning application a study has been prepared by ARUP on behalf of the Council titled: *Solar Farm Landscape Sensitivity and Capacity Study* (10 May 2024). This is considered in the updated LVIA (October 2024) as it supports the original conclusion of the landscape being of medium sensitivity, but was not raised in the WWA review.

The photomontages prepared by The Landmark Practice in March 2024 are now included in the updated LVIA (October 2024) as Figure 8 and are referenced in Section 6.

Section 6 of the updated LVIA (October 2024) also provides a detailed assessment of the visual effects upon the PRowS in the southern study area with multiple locations photographed and evidenced in Appendix 3 to this LVIA. The assessment concludes limited inter-visibility between these PRowS receptors and the Development.

The assessment of cumulative visual effects upon the PRowS receptors in the southern study area is included in Section 7 and is supported by the updated Figure 6 and Figure 8, and Appendix 3. The updated Figures 6 and 8, and Appendix 3 are considered to provide sufficient level of information with regards the cumulative developments and to enable the Council to make an informed judgment. The cumulative visual effects have been judged to be highly localised and limited.

The assessment of cumulative landscape character effects is included in Section 7 and the effects are judged to be limited and not material in character terms. With regard the cumulative developments at screening and scoping stage these are not considered informative to this Development given that such cumulative developments are unlikely to come forward before the determination of the Development. This is clarified in this Section 1, sub-heading 'Cumulative Effects', and again in Section 7.

The updated LVIA concludes that the Development has been considered in the context of the relevant planning policies and published landscape character assessments, and has been subject to a thorough on-site assessment, and iterative design process with regard the extent of the developable areas and landscaping proposals. The Development can be effectively integrated and assimilated into the surrounding landscape with the adverse effects highly localised to the immediate environs only, and being temporary and reversible, with the proposed mitigation planting substantially reducing the scale of adverse effects to a negligible level and only highly localised moderate adverse residual effects upon the users of the Midshires Way as they travel across the Development.

The introduced built-in mitigation measures, such as offset from the site boundaries and considerable amount of woodland and tree planting assist in reducing the adverse effects and allowing the development to be assimilated into the receiving environment without any residual undue harm.

With regards to cumulative landscape character effects, the additionality of the Development has been judged to result in minor adverse effects - this applies to the eastern part of the host Draft Policy Zone NW01 'Gotham and West Leake Wooded Hills and Scarps' only. The underlying working agricultural character of the local landscape would prevail and the remaining part of the host Draft Policy Zone NW01 'Gotham and West Leake Wooded Hills and Scarps' would be subject to negligible cumulative landscape character effects.

As part of the cumulative assessment, the visual receptors and viewpoints associated with the identified cumulative schemes have been reviewed and appraised. Cumulative views would only exist between the Development and adjacent approved scheme at Land To North East Of Highfields Farm, Bunny Hill, Costock (22/00303/FUL). Simultaneous cumulative views are largely limited to the elevated section of Public Footpath Costock FP4, glimpsed views from Wysall Road as one passes the site, and restricted views from within the Site looking west. The cumulative visual effects have been judged to be generally negligible, locally increasing to moderate adverse at most at Year 1, and generally diminishing with time.

Ecology

We note the Council Ecologist has raised no objections with their comments concluding: *“It is unlikely that this development will have a detrimental impact on populations of protected species provided the proposed reasonable avoidance measures, mitigation and enhancements are implemented.”*

We have reviewed the comments raised by the Nottinghamshire Wildlife Trust and hosted a meeting with them on site and have made some minor changes to the design and the landscape strategy in response to the comments. The focus of these changes has been along the western boundary of the solar farm, creating a wider green infrastructure corridor north to south better joining up existing mature woodland blocks.

We have prepared an Ecology Response Note responding to comments from the Council Ecologist and Nottinghamshire Wildlife Trust and also providing a summary of the Biodiversity Net Gain Assessment which has been updated following changes to the design and landscape strategy. In summary the revised BNG delivers 81.94% gain in habitats units (up from 80.65%), 66.24% gain in hedgerow units (up from 62.76%) and 14.4% gain for watercourse units (unchanged from before), all substantially above the legal requirements under the Environment Act. The EclA has been updated with the latest BNG Assessment and is also submitted to the Council.

Heritage

Comments were received from Historic England dated 13th March 2024 which requested additional information or clarification regarding the potential indirect effects on designated heritage assets. We initially paused from preparing clarification information pending receipt of comments from the Council's Conservation Officer. In the continued absence of these we have proceeded with responding to Historic England comments via the Response to Historic England Comments document prepared by Pegasus, October 2024. The document details a site visit undertaken between Pegasus and Historic England and subsequent correspondence between the two parties. This document should be reconsulted with Historic England such that they have an opportunity to provide updated comments on the planning application.

Ongoing Activities

We have agreed the scope and extent of pre-determination archaeological trial trenching with the County Archaeologist at Nottinghamshire County Council. The Written Scheme of Investigation has been approved by the County Archaeologist and site works commenced on the 21st October 2024. The works will depend on the weather and the level of finds uncovered but are expected to last circa 6 weeks with a further circa 8 weeks to enable a full evaluation report.

We are working very closely with the County Archaeologist on the approach and findings of the investigation. There will be regular site visits and updates via phone and email. We will look to keep the Council updated with progress and timescales as the works progress and this will likely be the critical path to determination of the planning application. It is anticipated that all matters with the exception of archaeology can be progressed while archaeology works are completed. A late updated consultation response from the County Archaeologist will be needed before the application could be determined.

Planning Policy

This section details the main changes to planning policy, guidance and government position since the planning application was submitted and validated in May 2023 and or includes information not included in the submitted Planning Statement.

NPPF

A consultation on the proposed draft policies of the National Planning Policy Framework (NPPF) was carried out from 30 July 2024 to 24 September 2024. The draft for consultation version of the NPPF was published on 30 July 2024. Of relevance to this application the proposed reforms to the NPPF include significant changes related to renewable energy development and the use of agricultural land. These changes are summarised below.

Benefits of Renewable Energy

The need for the planning system to meet the challenges of climate change remains in the draft version of the NPPF. Paragraph 158 of the draft NPPF (paragraph 157 in the previous version) is unchanged. It states that the *“planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”*.

The draft NPPF now gives significantly more support to renewable energy development in both the plan making process and the decision making process.

Paragraph 161 b) introduces a requirement for local authorities, when preparing their development plans, to identify suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, ensuring a strategic approach to meeting energy needs.

Paragraph 164 highlights the increased support for renewable energy projects, advising decision-makers to give significant weight to proposals that contribute to renewable energy generation and achieving net zero goals. It now simply states: *“In determining planning applications Local Planning Authorities should support planning applications for all forms of renewable and low carbon development”*. It then goes on to detail the considerations for determining renewable and low carbon developments. There remains no requirement for applicants to demonstrate the overall need for renewable or low carbon energy and significant weight should be given to the contribution to renewable energy generation and a net zero future.

Agricultural Land

Footnote 63, attached to paragraph 181 of the NPPF, concerns the use of agricultural land for development and it has been amended to remove the requirement to consider the availability of agricultural land for food production when deciding what sites are most appropriate for development. The footnote retains the requirement that when development is necessary on agricultural land *“areas of poorer quality land should be preferred to those of a higher quality”*. The Agricultural Land Classification (ALC) report for the Site confirms there is no use of Best and Most Versatile (BMV) agricultural land with all land classed as Grade 3b and Grade 4. As the use of the site for food production is no longer a consideration, and the site does not compromise BMV, the use of the land for renewable energy development is in principle in accordance with the draft policies in the NPPF.

Summary of changes to the NPPF

In summary, the amendments to the NPPF policies give much greater support for all forms of renewable energy development. The amended policies in the NPPF concerning the use of agricultural land for development are now more flexible, supporting renewable energy development on agricultural land when necessary if the application site constitutes poorer quality land. For these reasons, the draft NPPF policies support the principle of Old Wood Energy Park.

Weight Given to Draft NPPF

The policies in the consultation version of the NPPF are only in draft form. The updated draft NPPF policies illustrate how the Government intends to use the planning system to facilitate increased renewable energy development, notably by boosting the weight that planning policy gives to the benefits associated with renewables. For these reasons, the draft policies concerning renewable energy

development and its development on agricultural land currently carry limited weight in the determination of planning applications.

This assessment of the weight given to the draft NPPF policies is supported by the opinion of a planning inspector in an appeal decision dated 22 August 2024 concerning a proposal for residential development and a solar panel array in the Green Belt at a site known as Home Farm, Chislehurst (Appeal Ref: APP/G5180/W/24/3339919). In the decision letter, the inspector attributed limited weight to the consultation version of the NPPF policies on the grounds that they were only in draft form.

National Policy Statements

Paragraph 5 of the NPPF recognises that the National Policy Statements (NPS) for the delivery of major energy infrastructure may be a material consideration in the determination of planning applications for renewable energy.

The NPSs recognise that large scale energy generating projects will inevitably have impacts, particularly if sited in rural areas. In January 2024, revised versions of the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) came into force.

The NPSs provide an up-to-date understanding of the Government's views on matters such as the level and urgency of the need for new solar generating capacity and as such are necessarily material in the determination of this application.

EN-1 also highlights in several places that demand for electricity is likely to increase and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The consequence of this is that if demand for electricity doubles by 2050, EN-1 states that *'we will need a fourfold increase in low carbon generation....In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60% increase in electricity. This means that the majority of new generating capacity needs to be low carbon'*.

EN-1 sets out that Critical National Priority low carbon infrastructure, which includes solar energy development, will be presumed to meet the tests for the most important policy designations including Green Belt (paragraphs 4.2.15-4.2.17). While the Development is not a nationally significant infrastructure project, the approach demonstrates the overwhelmingly positive policy support for this type of development.

Under the specific heading of Solar Photovoltaic Generation at Section 2.10, EN3-confirms that *'The Government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.'*

Paragraph 2.10.10 states that: *"Solar also has an important role in delivering the government's goals for greater energy independence. The British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use"*.

Paragraph 2.10.13 confirms: *"Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation"*.

Paragraph 2.10.14 confirms: *"Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free."*

Paragraph 1.2.1 confirms: *"In England this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)"*.

The made NPSs thus confirm that the NPSs can be a material consideration in decision making on applications that both exceed or sit under the threshold for nationally significant projects.

The general framework established in EN-1 demonstrates that there is a need for solar farms which is urgent; that substantial weight should be given to this need when considering applications (for development consent under the Planning Act 2008); and that the government has concluded that there is a *'critical national priority'* (CNP) for the provision of nationally significant low carbon infrastructure.

The Development includes a solar farm which falls short of the 50MW threshold (measured as the Alternating Current capacity of solar inverters excluding any capacity used for reactive power) to be treated as a NSIP project under the Planning Act 2008. Nevertheless, the CNP policy signifies an important shift in the approach to renewable energy projects affecting sensitive designations, and reiterates the importance of delivering such projects, even where significant harm may arise. The NPPF also acknowledges, at paragraph 163a that *"even small-scale projects provide a valuable contribution to significantly cutting greenhouse gas emissions"*.

The implications of this urgent need for the delivery of this CNP infrastructure when EN-1 advises that other residual impacts should, in general, be outweighed by the energy objectives (paragraph 3.3.63):

"Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible."

In terms of the weight to be accorded to the overarching need for new renewable energy infrastructure, EN-1 states:

The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.

Other Government Statements

In a review published on 13 January 2023 the former government energy minister Chris Skidmore published his conclusions on the Net Zero position in his report "Mission Zero". His review makes 129 recommendations, all to seize opportunities from creating a green economy.

Paragraph 317 of the Mission Zero Report states:

"The growth in clean energy sources has opened up new economic opportunities in the UK. According to industry figures, 1 in every 48 jobs is in the energy sector or 138,000 direct and 605,000 indirect jobs, with the sector contributing £40bn of the UK's gross value added (GVA). The five-fold increase in renewable energy generation since 2010 created new jobs across the country. ONS data suggests that in 2020, more than 200,000 people were employed in the UK low carbon and renewable energy economy, which had a turnover of £41.2bn. Bloomberg New Energy Finance (BNEF) estimate that in 2021 alone, around \$31 billion of new investment was committed in the UK across low carbon sectors. Research suggests that investments in renewables over the last decade have led to a return of over 400%, compared to 59% for investments in fossil fuels."

The Government's Energy Security Plan (March 2023) ("ESP") was not detailed in the submitted Planning Statement but it explains proposals to establish a solar government-industry taskforce and roadmap to ensure a deployment trajectory to achieve 70GW of solar by 2035. It explains that:

"The UK has huge deployment potential for solar power, and we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035. This amounts to a fivefold increase on current installed capacity. We need to maximise deployment of both types of solar to achieve our overall target [...]."

Considerable importance is attached to this clear statement, in that the Government is clear that the deployment of ground mounted solar (as well as roof mounted solar) needs to be maximised if the fivefold increase in solar PV deployment is to be met.

The ESP goes on to explain that:

"Ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. The Government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. Solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land. We consider that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment. The Government considers that there is a strong need for increased solar deployment, as

reflected in the latest draft of the Energy National Policy Statements. We recognise that as with any new development, solar projects may impact on communities and the environment. The planning system allows all views to be taken into account when decision makers balance local impacts with national need."

The ESP makes it clear that the Government 'seeks' large scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. The Development would assist in achieving what the Government seeks in the ESP.

The ESP further encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental management. The Development will assist in delivering agricultural practice in the form of sheep grazing/farming, and environmental benefits through delivering a significant increase in Biodiversity Net Gain.

The conclusion reached in the ESP are clear *'the Government considers that there is a strong need for increased solar deployment.'* The ESP's comment that the planning system allows all views to be taken into account when decision makers balance local impacts with national need. In the case of this Development, the limited extent of local impacts identified are outweighed by this *'strong'* national need for solar development.

On 15th May 2024, the then Secretary of State for Energy Security and Net Zero issued a Written Ministerial Statement (WMS) which has become a material planning consideration in TCPA determinations from the date on which it was issued. Whilst it does not say so explicitly, it would appear that the intention is to supersede the Written Ministerial Statement of 2015. The focus of this statement is upon the following matters:

- Food security as an essential part of national security (however it is noted post the July 2024 election proposed changes in the draft NPPF remove the footnote on food security which has been further supported in speeches by the current Secretary of State for Energy Security and Net Zero, Ed Miliband);
- Energy security is being threatened by world events;
- Protecting the best agricultural land;
- Addressing cumulative impacts;
- Improving soil surveys; and
- Supporting solar on rooftops and brownfield sites.

Following the general election in 2024 a further Written Ministerial Statement was made by the Deputy Prime Minister, and Secretary of State for Housing, Communities and Local Government on 30 July 2024 concerning changes to planning policy. The WMS primarily concerns changing planning policy to build more homes, but it also proposes significant changes to policy concerning the delivery of critical infrastructure which includes renewable energy. The Statement says that *"boosting the delivery of renewables will be critical to meeting the Government's commitment to net zero carbon electricity generation by 2030"*. The weight that planning policy gives to the benefits associated with renewables is to be significantly increased.

The Written Ministerial Statements are a material consideration in current planning decisions. The reason for this is provided by legal precedent in the case of *Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor* [2011] EWCA Civ 639, the court addressed the significance of written ministerial statements in the context of planning decisions. This judgement emphasised that such statements can constitute a material consideration in planning decisions, which must be taken into account by planning authorities when determining applications.

In the *Cala Homes* case, the written ministerial statement in question related to the government's intention to revoke Regional Spatial Strategies (RSSs), which were part of the development plan system. The court found that the statement indicated a clear and firm policy direction from the government, signalling an impending change in the planning framework. As such, it was deemed capable of being a material consideration because it reflected the current policy stance and intentions of the government, which planning authorities are obliged to take into account.

Thus, the judgement established that written ministerial statements could influence planning decisions when they provide relevant policy guidance or signal significant policy shifts. This ensures that planning authorities consider the most current and pertinent policy directions from the government, aligning local decisions with broader policy objectives and legal requirements.

The Written Ministerial Statement dated 30 July 2024 concerns the Government's policy direction with regards to sustainable economic growth and renewable energy development and is the most recent such statement. For the reasons stated above, it is a material consideration in the planning decision making process for the planning application.

Summary of Updated Reports and Drawings Submitted

The following updated reports and drawings are submitted – these have been sent via Cryptshare with notification provided to planningandgrowth@rushcliffe.gov.uk:

- Updated Landscape and Visual Impact Assessment, Pegasus, October 2024 including figures and visualisations – submitted as 17 parts given the size of some of the files.
- Ecology Response Note, Exagen, October 2024
- Updated Ecological Impact Assessment (EclA) including updated BNG calculations from Clarkson and Woods, October 2024
- Revised Statutory BNG Metric (Excel Document), October 2024
- Response to Historic England Comments, Pegasus, October 2024
- Revised Site Layout Plan, Drawing reference: WLL02A-EXG-04-00-D-K001-P05, note this drawing now also includes distances between fences and boundaries and other features across the Site to aid better understanding of the sizes given the scale of the plan
- New Plan - Footpath Buffers Plan, Drawing reference: WLL02A-EXG-04-00-D-K002-P02
- New Plan – Green Infrastructure Plan, Drawing reference: WLL02A-EXG-00-00-D-K015-P01
- Revised Landscape Strategy, Drawing reference: P21-2533_EN_06E

I trust that you have the information you require to undertake a further round of consultation on the application and that on receipt of the archaeological trial trenching evaluation report and County Archaeologists comments you would be in a position to progress with determination of the planning application.

Should you have any questions, wish to discuss any of the recent information further, or feel more information is still required then please don't hesitate to contact me.

Yours sincerely,

Andrew Mott

Head of Planning and Environment

Exagen Development Limited