

Brighton & Hove City Council Draft Urban Design Framework SPD

Strategic Environmental Assessment Screening

& consideration of Habitats Regulations Assessment Screenings of relevance to the SPD

March 2018

1.0 STRATEGIC ENVIRONMENTAL ASSESSMENT

1.1 Introduction and scope of the SPD

- 1.11 Brighton & Hove City Council is preparing the Urban Design Framework Supplementary Planning Document (SPD) which will provide guidance that will help to raise the quality of design across the city.
- 1.12 The National Planning Policy Framework recognises the importance of high quality design and requires planning policies and decision to ensure that developments function well, establish a strong sense of place, respond to local character, create safe environments and are visually attractive.
- 1.13 The council's adopted [City Plan Part 1 \(2016\)](#) contains strategic policies CP12 Urban Design, which seeks to raise the standard of architecture in the city and identifies areas which have potential for taller developments, and CP13 Public Streets and Spaces which seeks to improve the quality, legibility and accessibility of the city's public realm.
- 1.14 In addition, the Development Area policies (DA1-DA6) have various requirements of relevance to the SPD. DA1 Brighton Centre & Churchill Square aims to secure a state of the art conference centre and requires improvements to the surrounding area through high quality building design; legibility, permeability and public realm improvements. DA2 Brighton Marina aims to secure high quality building design and seeks to improve connectivity and legibility. DA3 Lewes Road requires improvements to the public realm and townscape. DA4 New England Quarter aims to create a business quarter consisting of high quality accommodation and requires development to strengthen links within the area with high quality streetscapes and public spaces. DA5 Edward Street & Eastern Road aims to secure significant improvements to the public realm and townscape. DA6 Hove Station aims to secure a high quality employment environment and requires development to improve the public realm and townscape. DA7 aims to secure a high quality development with improved accessibility. DA8 seeks to secure improvements to legibility, permeability and connectivity through high quality building design.
- 1.14 The Urban Design Framework SPD will supplement and support the implementation of these policies by providing guidance for how developments can meet CPP1 policy requirements. It will be a city-wide document that will:
- Identify and set out areas of the city which should largely be conserved or are suitable for positive enhancement
 - Identify strategic views into, out of and within the city
 - Set out area and site specific design principles
 - Provide clarity on areas that can accommodate taller development as defined in CP12
 - Ensure that public-realm improvements are pedestrian and cyclist friendly that accommodate the needs of all people

1.2 Legislative background

- 1.21 The Strategic Environmental Assessment (SEA) Directive (2001/42/EC) requires an environmental assessment to be made of certain plans or programmes. The SEA Directive has been transposed into UK law through the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (hereafter referred to as “the Regulations”).
- 1.22 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents and it is considered best practice to incorporate requirements of the SEA Directive into an SA. Subsequently, the 2008 Planning Act removed the requirement to undertake a SA for a Supplementary Planning Document, but not the requirement for a SEA.
- 1.23 Government advice in Paragraph: 008 Reference ID: 11-008-20140306 of the [Planning Practice Guidance \(PPG\)](#) makes clear that SPDs do not require a sustainability appraisal but may in exceptional circumstances require SEA if they are likely to have significant environment effects that have not already been assessed during the preparation of the Local Plan.
- 1.25 In addition, the guidance states that a SEA is unlikely to be required where a SPD deals only with a small area at local level, unless it is considered that there are likely to be significant environmental effects.

1.3 City Plan Part 1 – SEA/SA

- 1.31 As part of the preparation of the City Plan Part 1, a combined [SEA/SA](#) was undertaken. This included assessments of all the policies contained within the City Plan. This found the likely impacts of policies CP12 and CP13 to be positive. The effects of the DA policies were more mixed, with adverse impacts largely due to the quantum of developments proposed.

1.4 SEA screening criteria and procedure

- 1.41 To assess whether SEA is required, Brighton & Hove City Council must undertake a screening assessment, based on a standard set of criteria as set out in the Regulations, to determine whether the SPD is likely to have significant environmental effects. The screening must then be subject to consultation with the three statutory bodies Historic England, Natural England and the Environment Agency.
- 1.42 Following consultation, the results of the screening process must be detailed in a publically available statement.

1.5 Screening

- 1.51 The following tables set out the criteria specified in Schedule 1 of the Regulations, and the response in relation to the SPD to help determine whether significant adverse effects are likely. The criteria look at both the characteristics of the SPD and also the effects of the SPD.

Table 1 Characteristics of the SPD

Criteria	Commentary	Significant Adverse Effect? Yes/No
<p>(1a) the degree to which the SPD sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</p>	<p>The UDF SPD will supplement and elaborate on the principles set out in CP12 Urban Design and CP13 Public Streets and Spaces, as well as some parts of the Development Area policies of the City Plan Part 1 and provides guidance on how development can achieve them. The City Plan Part 1 underwent full combined SA/SEA as part of its preparation.</p> <p>The SPD will not present any new policies, and its purpose is to provide greater clarity on how new development can meet the requirements of existing policy, particular those relating to design .</p> <p>City Plan Part 1 established the overarching planning framework. The SPD will not set the framework for projects as forms a lower tier of the existing planning framework. The SPD will not allocate land.</p> <p>The SPD will include generic design guidance that will be applicable across the city, as well some area specific guidance, e.g. to supplement the Development Area policies. The SPD will not identify areas suitable for taller buildings, as these have already been identified through background studies and are defined in CP12. It will however provide some area-specific design guidance for the tall building areas.</p> <p>The SPD will support the preservation of areas with good design and the improvement of areas with poorer design by identifying areas suitable for conservation or for positive enhancement, based on existing background studies which form part of the evidence base for City Plan Part 1 including the Urban Characterisation Study and the Historic Character Assessment.</p>	<p>No</p>
<p>(1b) the degree to which the SPD influences other plans including those in a hierarchy;</p>	<p>The guidance provided in the SPD will be supplementary to existing adopted policy in the City Plan Part 1 and will provide clarity as to how development can meet the requirements of existing policy. The SPD forms the lower tier of the planning policy hierarchy and therefore does not influence other plans.</p>	<p>No</p>
<p>(1c) the relevance of the SPD for the integration of</p>	<p>All planning documents must be in conformity with the NPPF and have an obligation to deliver sustainable development. The</p>	<p>No</p>

<p>environmental considerations in particular with a view to promoting sustainable development;</p>	<p>SPD will promote sustainable development by providing guidance on implementation of and compliance with design policies contained within the City Plan policies and also supports implementation of other policies for example CP8 Sustainable Buildings, CP9 Sustainable Transport and CP15 Heritage.</p> <p>In particular, environmental topics that may be considered through the SPD, or that the SPD may have an influence on include conservation of cultural heritage, townscape/streetscape improvements including through green infrastructure, transport, travel and movement, protection of landscape quality, crime, safety and active living.</p>	
<p>(1d) environmental problems relevant to the SPD;</p>	<p>The SPD will be applicable city-wide and therefore some city-wide environmental problems will be of relevance as could be influenced by the design of buildings, streets and spaces. However, detailed design guidance is unlikely to exacerbate environmental problems and could support improvements as described below.</p> <p>Climate Change: some of the impacts of climate change include increased extreme weather events, increased risk of flooding, higher temperatures and damage to ecosystems. SPD could support increasing resilience to climate change through support for climate resilient and sustainable materials and construction.</p> <p>Transport: parts of the city suffer from congestion, particularly at peak times, weekends and during the summer; there is little spare capacity at key bus interchange locations which constrains bus network expansion; there have been improvements made to cycling infrastructure however there are many areas of the city with no cycle lanes or with missing links; walking is often one of the quickest ways of getting around the city, however certain parts of the city can be difficult to navigate and lack legibility. SPD may positively influence travel choice through improvements to the public realm particularly for cyclists and pedestrians.</p> <p>AQMA: designated for exceedance in NO₂, caused by vehicular traffic, however also influenced by the existing street-scape and design of streets, e.g. narrow streets do not allow for easy dispersal of pollutants known as the canyon effect. SPD may positively influence air quality by providing guidance which reduces the likelihood of the canyon effect through the design of streets, and also through improvements to public realm which may influence travel choice.</p> <p>Surface water flooding: various degrees of risk across the city and new development can increase the risk of flooding</p>	<p>No</p>

	<p>elsewhere. SPD may reduce the risk of surface water flooding by providing guidance on SUDS features which could be incorporated within the design of buildings although this may be outside the scope of the SPD.</p> <p>Green infrastructure/loss of biodiversity: SPD may support net gains in biodiversity, e.g. through guidance on biodiversity that could be included within schemes, e.g. street-trees.</p> <p>Any guidance the SPD provides on these issues will supplement and support that provided in existing policy, including CP8 Sustainable Buildings, CP9 Sustainable Transport, CP10 Biodiversity and CP11 Flood Risk.</p>	
(1e) the relevance of the SPD for the implementation of community legislation on the environment (e.g. plans linked to waste or water protection)	<p>The EU has adopted a range of legislation aimed at protecting the environment including:</p> <ul style="list-style-type: none"> - EU Directive 2009/147/EC on the conservation of wild birds. - EU Directive 1992/43/EEC on the conservation of habitats. - EU Directive 2008/50/EC on ambient air quality and cleaner air. - EU Directive 2002/49/EC on environmental noise. - EU Directive 2008/98/EC waste framework directive. - EU Directive 2000/60/EC) water framework directive. - EU Directive 2007/60/EC assessment and management of flood risks. <p>The SPD will support implementation of and will be in compliance with the City Plan which has already taken account of the existing European and National legislative framework for environmental protection. It should therefore have a positive effect on compliance however this legislation has been taken into account at a higher level.</p>	No

Table 2: Effects of the SPD

Criteria	Summary of Effects	Significant Adverse Effect? Yes/No
(2a) What are the probability, duration, frequency and reversibility of the effects of the SPD?	<p>The SPD has potential to result in largely positive environmental effects, as described above, some which are probable and some of which may be long-lived due to the “life” of development and could therefore be considered permanent and irreversible. However the main aim of the SPD is improving good design and facilitating sustainable movement and therefore the effects of the SPD are anticipated to be positive overall.</p>	No

<p>(2b) What is the cumulative nature of the effects of the SPD?</p>	<p>The SPD will provide guidance on how the design principles set out in CP12 and CP13 in particular can be achieved. Therefore the SPD could have cumulative effects with these policies, however as the effects of the SPD are anticipated to be beneficial, any cumulative effects are also anticipated to be positive. In addition, the SPD could have cumulative effects across the city, e.g. through incremental changes arising from individual developments, however, these effects are also anticipated to be positive.</p>	<p>No</p>
<p>(2c) What is the trans-boundary nature of the effects of the SPD?</p>	<p>The effects of the SPD will be predominantly local in nature. There could be transboundary effects on adjacent authority areas, including the South Downs National Park, resulting from the identification of strategic views into and out of the city, however these are likely to be positive.</p>	<p>No</p>
<p>(2d) Are there any risks to human health or the environment (e.g. due to accidents)?</p>	<p>No significant risks to human health or the environment are envisaged through application of the SPD. The SPD is envisaged to result in largely beneficial effects, and any improvements to the environment could have positive implications for health.</p>	<p>No</p>
<p>(2e) What is the magnitude and spatial extent of the effects (i.e. geographical area and size of population likely to be affected) of the SPD?</p>	<p>The SPD will be applicable to all new development across the entire city therefore the magnitude and spatial extent of the SPD is considered to be large. However the effects of the SPD are considered to be beneficial.</p>	<p>No</p>
<p>(2f) Is the value and vulnerability of the area to which the SPD relates likely to be affected by the SPD due to:</p> <ul style="list-style-type: none"> • Special natural characteristics or cultural heritage, • Exceeded environmental quality standards or limit values, or • Intensive Land use? 	<p><u>Special natural characteristics</u></p> <p>There is one European site within the city: Castle Hill SAC; there are two SSSIs: Castle Hill and Black Rock to Newhaven Cliffs; there are 8 declared/proposed Local Nature Reserves; there are 62 SNCIs (currently under review and will be renamed Local Wildlife Sites). Nature Conservation designations cover over 17% of the total area of Brighton & Hove. The SPD is not considered to impact on the SAC or SSSI. The SPD may be applicable if development comes forward within a LNR or SNCI, and should positively influence the design of development however is unlikely to have a significant impact on the designations as development would be guided by other policy that relates to nature conservation, e.g. CP10 Biodiversity.</p> <p>There is a Marine Conservation Zone which extends from Brighton Marina to Beachy Head. The SPD is not considered to impact upon the MCZ.</p> <p>There are 3 Regionally Important Geological Sites, including the</p>	<p>No</p>

Black Rock to Friars Bay chalk cliff line; and 2 other sites which consist predominantly of sarsen stones in Hove Park and Stanmer Park. The SPD is unlikely to impact upon the RIGs.

All of Brighton & Hove falls within the Brighton & Lewes Downs Biosphere which aims to create a world-class environment, that is economically successful and enjoyed by all, forever. The SPD could positively impact upon the Biosphere by supporting sustainable development in this location that incorporates biodiverse features.

Cultural heritage

The city has a rich historic built environment, including around 3,400 individually listed buildings and structures, 34 conservation areas, 6 historic parks and gardens, 16 scheduled monuments and over 80 archaeological notification areas.

The SPD will provide guidance which should help to meet the priorities of CP12 and CP13, including identifying areas which should largely be conserved, helping to raise the standard of architecture in the city, helping to establish a strong sense of place, helping to enhance local distinctiveness, all of which should help to conserve or enhance the city's built heritage, having overall positive impacts for cultural heritage.

Exceeded environmental standards

Parts of the city are covered by an AQMA due to the exceedance of NO₂. The SPD could positively impact on air quality through improvements to the public realm which may influence travel choice, and potentially through design of streets and spaces that allow for easy dispersal of pollutants although effects are unlikely to be significant in nature and development would be more likely to be guided by other policy that relates to this topic area, such as CP9 Sustainable Transport.

Intensive land use

The city of Brighton & Hove is heavily constrained and has a high need for new housing as well as other forms of development. The City Plan Part 1 guides the development of significant new housing in the city and proposes 13,200 new homes in the area to 2030 some of which will be delivered through tall buildings. Population and dwelling density is already high in certain parts of the city and new development will intensify land use. The SPD will provide guidance on areas suitable for taller developments, which have already been

	identified through background studies, and should ensure that new developments are designed sensitively to respect any cultural or natural assets whilst also maximising densities in order to meet development needs.	
(2g) Will the SPD have an effect on areas or landscapes, which have a recognised national, community or international protection status?	Part of the city includes land within the South Downs National Park (SDNP), however land within the SDNP is within its own planning area and therefore the SPD will not be of direct relevance to any development within the SDNP. However, the SPD could have impacts upon the SDNP and its setting as the guidance will identify strategic views in and out of the city, likely to have beneficial effects.	No.

1.6 Initial conclusion prior to consultation

- 1.61 The council believes that the impact of the SPD will be largely beneficial and is unlikely to result in any significant adverse effects. In addition, the SPD is not setting new policy, but rather it is supplementing existing policy, which has already undergone the SA/SEA process, by providing further guidance.
- 1.62 Therefore it is considered that an SEA is not required for the Urban Design Framework SPD, as it is unlikely to result in significant adverse environmental effects, and because it supplements exiting policy which has already undergone SEA.

1.7 Consultation and final determination

- 1.71 The results of this screening was made available to the three statutory bodies, Historic England, Natural England, and the Environment Agency.
- 1.72 A response was received from the Environment Agency, which concurred with the conclusion the SPD was unlikely to give rise to significant adverse environmental effects for areas within their remit and that an SEA would not be required.
- 1.73 A late response was received from Historic England, which also concurred with the conclusion.

2.0 HABITATS REGULATIONS ASSESSMENT SCREENINGS OF RELEVANCE TO THE SPD

Introduction

- 2.1 Brighton & Hove City Council is required to consider whether its planning documents would have a significant adverse effect upon the integrity of internationally designated sites of nature conservation importance including 'European sites' which are designated within the city of Brighton & Hove and the wider sub-region. This consideration is undertaken through a process known as a Habitats Regulations Assessment (HRA) which is a requirement of the [Conservation of Habitats and Species Regulations \(2010\)](#) (the Habitats Regulations).
- 2.2 European sites provide important habitats for rare, endangered or vulnerable natural habitats and species of exceptional importance within the European Union. These sites consist of Special Areas of Conservation (SACs, designated under the EU Directive 92/43/EEC on the conservation of natural habitats and of fauna and flora (Habitats Directive)) and Special Protection Areas (SPAs, designated under EU Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)).
- 2.3 Government policy (National Planning Policy Framework (NPPF) (DCLG 2012) and Circular 06/05 (ODPM, 2005)) requires that Ramsar sites (designated under the International Wetlands Convention, UNESCO, 1971) are treated as if they are fully designated European sites for the purposes of considering development proposals that may affect them.
- 2.4 The Habitats Regulations must be applied to all Local Development Documents (LDD) in England and Wales and aims to assess the potential effects of a land use plan against the conservation objectives of any European sites designated for their nature conservation importance.
- 2.5 There are two stages of HRA; the screening which determines the likelihood of significant effects; and a full HRA which only has to be undertaken if the screening indicates that significant effects are likely. Where a full HRA is carried out, a plan may only be adopted after having ascertained that it will not have significant adverse effects on the integrity of the site concerned.
- 2.6 The City Plan Part 1, which is the overarching Development Plan Document for Brighton & Hove, has already been subject to a screening under the Habitats Regulations. The purpose of this statement is therefore to reconsider the HRA screening assessments that have been undertaken for the City Plan Part 1, in relation to the Urban Design Framework SPD.

Local European Sites

- 2.7 The Castle Hill SAC lies partly within the city's boundary and partly within Lewes District Council's boundary, although is located entirely within the South Downs National Park Authority Area. There are no Special Protection Areas or Ramsar sites within the city's boundary. There are also some European sites within 20km of the city including Lewes Downs SAC, Ashdown Forest SAC/SPA and Arun Valley SPA.
- 2.8 The Castle Hill SAC designation relates to the presence of chalk grassland and some rare and scarce species; the Lewes Down designation also relates to the presence of chalk grassland and some rare and scarce species; the Ashdown Forest designation is due to the largest single continuous blocks of lowland heath in the south east; and the Arun Valley designation is due to the wintering population of tundra swans.

Scope of the SPD

- 2.9 The purpose of the SPD is to provide guidance that will help to raise the quality of design across the city. The guidance provided in the SPD will predominantly support the implementation of [City Plan Part 1](#) policies CP12 Urban Design and CP13 Public Streets and Spaces as well as supplement Development Area (DA) policy requirements relating to design and public spaces.
- 2.10 The SPD will identify and set out areas of the city which should largely be conserved or are suitable for positive enhancement, will identify strategic views into, out of and within the city, will set out area and site specific design principles, will provide clarity on areas that can accommodate taller development (with areas already set out in City Plan Part 1 CP12 Urban Design), and ensure that public-realm improvements are pedestrian and cyclist friendly that accommodate the needs of all people.

City Plan Part 1 Habitats Regulations Assessment screenings

- 2.11 A [Habitats Regulations screening](#) was undertaken in 2014 for the City Plan Part 1 (Proposed Modifications 2014), which relates to the adopted City Plan Part 1 (2016), and assessed the potential for impacts of all policies on the Castle Hill SAC. The screening also included European sites outside the city which may also be potentially affected by development in Brighton & Hove including Lewes Downs SAC (6km from boundary), Ashdown Forest SAC & SPA (19.5km), and Arun Valley SPA (20km).
- 2.12 Previous to this, a [screening](#) was also undertaken in 2013 on the policies contained within the Proposed Submission City Plan Part 1.
- 2.13 The screenings included an initial assessment of the potential for environmental impacts resulting from each policy that needed to be considered by the HRA screening. Both assessments concluded that there were no potential environmental effects of relevance to the HRA resulting from policies CP12 and CP13.
- 2.14 The screening assessments also looked at the potential combined effects of all the policies within the City Plan, which could affect the integrity of European sites. These amounted to water abstraction, air pollution and recreational pressure. Of these:
- *Water abstraction would not have a significant effect on any European site because there are no such sites which are vulnerable to water abstraction within the water catchment area of Brighton and Hove.*
 - *Despite policies which promote travel choice and minimise air pollution, it is still possible that air pollution may worsen as a result of the City Plan Part 1. However localised air pollution of this nature would not have a significant effect on any European site, according to Natural England advice.*
 - *Recreational pressure on downland in the vicinity of Brighton and Hove may increase as a consequence of the City Plan Part 1. However only one of the European sites assessed is vulnerable to recreational pressure (Ashdown Forest). Studies elsewhere have shown that this site is far enough away from Brighton and Hove to safely conclude that there would be no significant recreational impact on it as a result of the City Plan Part 1, (with recreational pressure more likely to arise from developments within 7km of this SAC/SPA).*

- 2.16 Therefore the HRA screening for the City Plan Part 1 discounted all possible significant impacts that would affect the designations of SACs or SPAs and therefore did not progress to a full Habitats Regulations Assessment.
- 2.17 As the purpose of the Urban Design Framework is to provide further guidance on how to implement the policies contained within City Plan Part 1, the HRA screenings already undertaken are of relevance to and apply to the SPD.

Conclusion

- 2.18 The Urban Design Framework SPD is not considered to require further screening under the Habitats Regulations. The effects of the SPD will be largely those related to the design of buildings and spaces, and the likely effects of the SPD have already been considered under the screening assessments undertaken for the City Plan Part 1, which discounted the likelihood of significant effects.

Consultation

- 2.19 This statement was circulated to Natural England for information.

From: Helen Pennington
To: ["consultations@naturalengland.org.uk"](mailto:consultations@naturalengland.org.uk); ["planningssd@environment-agency.gov.uk"](mailto:planningssd@environment-agency.gov.uk); ["e-seast@english-heritage.org.uk"](mailto:e-seast@english-heritage.org.uk)
Subject: Consultation of SEA screening and consideration of HRA requirements - Urban Design Framework SPD, Brighton & Hove City Council
Date: 05 February 2018 10:07:25
Attachments: [Final screening UDF Feb 2018 pre consultation.pdf](#)

Dear statutory consultees

Strategic Environmental Assessment screening

Brighton & Hove City Council has started preparation of the Urban Design Framework SPD which will set out guidance on how to implement requirements established in City Plan Part 1 predominantly relating to the design of new developments.

In accordance with Regulation 9 of the SEA Regulations, the council has undertaken a screening exercise to help determine whether or not the SPD is likely to result in significant effects and whether it should be subject to Strategic Environmental Assessment, as attached.

The initial conclusion is that the SPD is unlikely to result in significant effects and therefore does not require SEA.

In accordance with Regulation 9(2)(b) the council is now consulting the three statutory bodies on the initial conclusion.

If you have any comments on the initial conclusion please could you email them to myself by **Tuesday 6th March 5pm.**

Following consultation on the screening, a final determination will be published by Brighton & Hove City Council taking into consideration any comments received.

Habitats Regulations Assessment consideration – for Natural England

In addition, the attached document also reconsiders the previous Habitats Regulations Assessment screenings that have been undertaken in Brighton & Hove to ascertain their findings in relation to the Urban Design Framework.

Best regards

Helen

Helen Pennington

Sustainability Appraisal Officer (I work Mondays-Thursday and alternate Fridays)

E: helen.pennington@brighton-hove.gov.uk

From: [PlanningSSD](#)
To: [Helen Pennington](#)
Subject: Consultation of SEA screening and consideration of HRA requirements - Urban Design Framework SPD, Brighton & Hove City Council - EA Comments
Date: 06 March 2018 13:31:59

Dear Helen,

Thank you for consulting the Environment Agency on the SEA screening decision for the Brighton and Hove City Plan Part 1 Urban Design Framework SPD.

Having read the screening exercise report which was attached to your email, the SPD is unlikely to give rise to significant adverse environmental effects for areas within our remit and hence we would not require a SEA.

Kind regards

Marguerite

[Marguerite Oxley](#)|[Technical Specialist](#)|[Sustainable Places](#)|[Solent and South Downs Area](#)
[Environment Planning and Engagement](#)|[Environment Agency](#)|[Guildbourne House](#)|[Chatsworth Road](#)
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From:
To: [Helen Pennington](#)
Subject: RE: Consultation of SEA screening and consideration of HRA requirements - Urban Design Framework SPD, Brighton & Hove City Council
Date: 16 March 2018 09:45:53

Dear Helen

My apologies, that we were unable to meet the deadline response for this consultation. This was due to a staff resource issue at this end.

For the record, Historic England concurs with the view set out in the Council's determination letter sent to us by email dated 12 March 2018.

Yours sincerely,

Alan Byrne BSc MSc IHBC
Historic Environment Planning Adviser
Planning Group
