



Strategic Planning Policy
Babergh and Mid Suffolk District Councils
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27th September 2019

Dear Sirs

**BABERGH AND MID SUFFOLK JOINT LOCAL PLAN – PREFERRED OPTIONS (REGULATION 18)
CONSULTATION - PROPOSED ALLOCATION LA013 – LAND NORTH OF THE A1071, SPROUGHTON**

I am instructed by Dr and Mrs D Brennand of Red House, Hadleigh Rd, Sproughton to raise objection to the proposed allocation LA013 – Land North of the A1071, Sproughton.

It is understood that a planning application is currently being prepared by Taylor Wimpey for submission relating to a differing (smaller) number of dwellings on this land. This response does not deal directly with that proposal, but will refer to it where relevant.

Background and Planning History

In 1986, an application was submitted to Babergh District Council for outline planning permission for a mixed development including “Residential, Public Park, Shops, Public House, Medical Centre, Supermarket, Exhibition Centre, Hi-Tec Business Park and Construction of New Roads and Alteration to Existing Roads” on land described as “Land between A45 by-pass and Chantry Park, Sproughton”.

The site extended to 72 ha (178a) and included the land parcels that are now identified as proposed allocations LA013 and LA014. The application was given reference B/1144/86.

The planning application was refused in May 1987 for six reasons. A copy of the decision notice is appended to this letter as Appendix 1.

An appeal was lodged in respect of this application and this was the subject of a public inquiry running across 10 days in October 1987 and 4 days in November 1987. The inquiry also considered an appeal relative to land south of Belstead Brook, which was 'coupled' to the Chantry Vale appeal insofar as it considered development of the Ipswich Fringe and required comprehensive consideration.

In early 1988, the Inspector concluded that the appeals should be dismissed.

The Inspector's reasoning remains as pertinent to this day as it did in 1987. Reference is made, therefore, to the conclusions made by the Inspector at the relevant parts of this submission. These conclusions are supported by site-specific evidence provided by my clients which demonstrates, beyond any reasonable doubt, that the proposed allocation is flawed, undeliverable and unsound.

Their reasons for concluding thus are set out below.

Landscape Impacts

My clients raise significant concerns with the potential landscape impacts of a development of the scale proposed on this land.

The proposed allocation policy LA013 identifies, at criterion ii), that;

"ii. Landscaping will be included to reflect the sensitivity of the landscape the area"

The Council clearly, therefore, recognise the sensitivity of the landscape in this location. Indeed, the emphasis given to it within this policy does not exist in other proposed allocations/policies within the emerging plan, where there is no reference to the 'sensitivity' of the landscape (even in numerous AONB locations). It is presumed that this reference results from the Council's own Settlement

Sensitivity Assessment that forms part of the evidence base informing the Joint Local Plan. This is commented on further shortly.

The Inspector in the 1987 Public Inquiry confirmed the sensitivity of this landscape. Indeed, the Inspector found that this was so sensitive such that the proposed development would be inherently harmful and could not be justified. The following extracts from the Inspector's decision clearly demonstrate this;

"18.13. The Chantry Vale appeal site comprises a substantial area of attractive, open rolling farmland between the by-pass and the existing urban edge of Ipswich. Its topography makes it prominent to view and its landscape features make a significant contribution to the attractive approach to Ipswich from the west. It also affords attractive views from other roads and footpaths which surround and cross the site.

18.14. Much of this scenic quality is due to the notable tree screen which borders the eastern side of the site. The general effect is of open countryside extending unbroken across the site and up to the very edge of the town, which is scarcely apparent behind the trees. The sugar beet factory, though unsightly itself, is seen as a relatively minor feature in terms of the large scale, long distance views".

18.15. The proposed development would extend housing beyond the wooded perimeter of the town into the open countryside. Housing would cover the slopes rising from the Gipping Valley which are exposed to view. Landscaping would not compensate for the loss of the fine views which are now enjoyed into and across the site. The setting of the listed buildings at Red House Farm would be seriously harmed.

18.16 The site also fulfils the valuable function of separating the village of Sproughton from the main built-up area of the town. The feeling of remoteness is helped by the strong tree screen which hides the presence of the town to the east".

"18.18 The existing edge of the town is well defined by the strong line of trees along the eastern site boundary, and there seems to be no justification for extending the urban area out to the line of the by-pass. In my judgement, these represent strong and clear-cut objections to the proposed development".

“18.26 In assessing the weight to be given to the objections I have identified, I place the greatest emphasis on those interests of acknowledged importance which would suffer permanent and irreparable harm. Foremost among these is the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village. The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value. The development would also detract markedly from the setting of Red House Farm.

18.27 In my judgement, the benefits associated with the proposed development would not compensate for its adverse effects”.

“18.47 In my view the grant of permission would only be justified by a very strong and urgent need to release more housing land. In this case, there is an identified need to find sites for 1,000 houses to be built. There is also sufficient doubt as to whether an adequate five-year supply of housing land exists to justify the added presumption in favour of granting permission. Nevertheless, in spite of this, I do not consider that the degree of urgency justifies the grant of planning permission to objectionable development while there is still the possibility of finding a more acceptable solution through a comprehensive study of all possible options. My recommendation is based on this reasoning”.

Furthermore, the Inspector also considered (in the event that either of the developments before him could be justified at all) that the land south of Belstead Brook represented the least harmful option available at that time. The Inspector considered that the harm to the landscape that would result at Chantry Vale would outweigh the highway safety aspects resulting from the Belstead Brook site. Put simply, the harm at Chantry Vale was considered to be so significant that a proposal that would have resulted in significant highway detriment elsewhere was still preferred. This demonstrates the need to carry out a full and robust assessment of alternative sites when considering the delivery of new development on the entirety of the Ipswich Fringe. My clients consider that such a robust assessment has occurred in respect of the emerging local plan.

The Inspector’s views on the sensitivity of this landscape are reinforced by a Landscape Appraisal by Alison Farmer Associates Ltd (AFA), commissioned by my clients and completed in September 2019

(Appendix 2 to this letter). It should be noted that AFA carried out the Settlement Sensitivity Assessment on behalf of a number of local authorities (including Babergh DC) in July 2018 which, as aforementioned, forms part of the evidence base upon which the Council's emerging plan is based. Their credentials, knowledge and relevance to assessing the landscape character of this parcel of land cannot, therefore, be at question.

The Landscape Appraisal identifies that the LA013 site is likely to constitute a valued landscape in the terms expressed by paragraph 170 of the NPPF. As such, any policy should be promoted with the aim of "*protecting and enhancing valued landscapes*". Policy LA013 clearly does not do this. It promotes the development of highly sensitive and prominent land that forms valued landscape and which has previously been found to require the highest level of protection. Indeed, the Council's Settlement Sensitivity Assessment found that;

Ipswich has, in places, extended beyond the Gipping Valley and head of the Estuary into adjoining landscapes, and in many respects has exceeded its natural landscape limits. This study has demonstrated that the river valleys that lie adjacent to Ipswich play an important role as recreational and ecological corridors, and as a setting to the town and smaller settlements. Higher ridges which remain undeveloped help to contain the river valleys and settlements beyond. These ridges are highly sensitivity to development.

Similarly some of the smaller rural settlements have been found to be highly sensitive to change in part due to their historic character and high quality landscape settings e.g. the rural villages of the Fynn and Lark Valleys.

Nevertheless, this sensitivity assessment has identified areas of lesser landscape and visual sensitivity which may be able to accommodate discrete well thought out development on the fringes of some of the settlements within the study area.

The LA013 land is recognised as one of the areas that was found to be highly sensitive to development. There are, as identified by the Council's own evidence base, areas that are of lesser landscape and visual sensitivity which may be able to accommodate new development. A number of these lie within the Babergh and Mid Suffolk districts. Development of this scale in this location is not, therefore, based on a robust assessment of alternative sites and flies in the face of the Council's own sensitivity appraisal. It is, thereby, promoted on a flawed premise that is contradicted by the Council's own evidence.

Furthermore, the Landscape Appraisal draws attention to the conflict with proposed policy LP18. Given that the LA013 policy includes a criterion which requires accordance with "(i.) *The relevant*

policies set out in the Joint Local Plan”, there is clear and recognisable conflict with the proposed allocation and other policies in the emerging plan. The plan is, therefore, self-contradicting and policy LA013 fails to meet a number of the tests imposed by its own content.

Given that the appeal Inspector found this area of land to be a *“large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich”* and that *“This open land also plays a vital role in protecting the separate identity of Sroughton village”* whereby it’s development would *“result in irreparable harm to those characteristics on which I place a very high value”* and *“also detract markedly from the setting of Red House Farm”*, it is abundantly clear that the proposed allocation of this land is flawed as a matter of principle. The landscape impacts simply cannot be mitigated to an acceptable extent such as to overcome the significant harm to this valued landscape.

The proposed allocation does not, therefore, comply with the provisions of the NPPF in terms of the resultant landscape impacts. The Council have failed to demonstrate why the loss of valued landscape is necessary when other alternatives exist, and have sought to promote development of this land in the clear knowledge that the impacts of such development cannot be suitably mitigated.

Heritage Impacts

Chapter 16 of the National Planning Policy Framework addresses the conservation and enhancement of the historic environment. It recognises that heritage assets *“are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”* (paragraph 184) and confirms through footnote 62 that *“The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making”*. As such, the same principles which relate to the decision making processes in which the Council are well-versed apply equally to the plan-making role that the Council is taking in this instance.

Of particular interest, the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment (March 2018) does not address this area at all. The introduction to this document, which is published as part of the Evidence Base supporting the Local Plan, states;

“The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils will provide part of the evidence base for a new Joint Local Plan and to inform Strategic Site Allocations for the Districts. The assessment ensures that the local planning authorities have up-to-date evidence about the historic environment in their districts, including an understanding of the significance of heritage assets. It also ensures that an assessment of the historic landscape is integrated within the council's existing assessments of landscape character and wider evidence base. This will help Babergh and Mid Suffolk District Councils to meet the requirement of the NPPF to 'set out a positive strategy for the conservation and enjoyment of the historic environment' within their Local Plans (para 126), and will help ensure that their future site allocations are found sound”.

It is wholly unclear how the largest allocation in the Babergh district, on land which the Planning Inspector found to be highly sensitive and which would affect the setting of prominent heritage assets on the edge of Ipswich, could be considered to be ‘sound’ when the evidence supporting it does not even assess the allocation in the same way as numerous smaller allocations have been. Whilst it is recognised that the Sustainability Appraisal identified ‘no harm to the significance of a heritage asset or that mitigation of any potential harm was possible’ by suggesting a positive heritage outcome, it is unclear how this conclusion has been reached. Coupled with the absence of any reference to heritage assets in the Taylor Wimpey Vision Document (2017) pertaining to the development vision for this land, it is suggested that the Council have failed to demonstrate a robust consideration of this site in terms of its heritage sensitivity, despite legislative and policy requirements to do so.

My clients have commissioned a Heritage Impact Assessment (HIA) by Michael Collins, Listed Building Planning Consultant. The HIA is appended to this letter as Appendix 3.

The HIA concludes that;

“The proposed land allocation would result in harm to the significance of the identified designated heritage assets at Red House Farm (HIA1) and Chantry Park (HIA2). The Red House Farm comprises a pair of listed buildings (the former farmhouse and its barn), whilst Chantry Park is both a registered park and garden and a conservation area. Great weight should be given to the conservation of a designated heritage asset when considering the impact of a proposal on its significance. In the context of the 1988 appeal decision, which concluded that the benefits of delivering 1,600 houses did not

outweigh the identified harm, the Council should amend the proposed land allocation to restrict residential development to the area of plateau that abuts the London Road and should consider alternative sites in order to deliver the proposed quantum of housing”.

As noted, and mirroring the conclusions reached in the Landscape Appraisal by AFA, the HIA recognises that there are areas of the LA013 site that can be considered to be less sensitive and could, therefore accommodate some development. The HIA is not, therefore, written in a manner to preclude development as a matter of principle, and provides a considered and evidenced appraisal of the potential impacts that makes the absence of such evidence from the Council’s published documents prominent.

The HIA finds, however, that the proposed allocation as currently presented would result in an adverse impact upon the setting of the (Red House) farmstead and would seriously affect a key element of its special architectural or historic interest. The proposed allocation cannot, therefore, demonstrate that the significance of heritage assets has been properly addressed. My clients’ property would be significantly harmed by the proposed development, and there is no scope to successfully mitigate this harm.

Drainage

Appended to this letter, as Appendix 4, is a letter from JPC Environmental Services dated 9th July 2019. The JPC letter provides an assessment of the hydraulic context of the land and identifies a number of areas of conflict/concern with drainage and flood risk that are of significant concern to my clients relative to the proposed allocation LA013.

Attention is drawn to a number of key points raised by this letter, most notably (emphasis added);

“As the Chantry Vale catchment comprises a large percentage of the contributing area to the Gipping at this point, any changes to the local hydrology have the potential to cause a significant adverse impact on the extent of the flood zones downstream”

“Surface water (pluvial) flooding has also been identified as a significant source of flood risk within the Vale. The EA’s flood mapping indicates floodwaters may reach a depth of up to 900mm in places and

have a flow rate in excess of 0.25 m/s adjacent to Red House. Notable areas at risk are those immediately upstream of the two culverted sections, the waterbody to the rear of Red House and the highways adjacent Red House. As Red House lies at the confluence of the two land drains it is particularly vulnerable to exceedance flows”

“.....flooding suggests the presence of a blockage between points C and D, preventing water from travelling through the culvert. We understand from anecdotal evidence that parts of this culvert have been repaired in the past, following previous incidents of flooding”

“Large scale alterations to the valley will cause significant changes to the movement of surface water throughout the landscape”

“Restricting these discharges to a few much larger points of discharge, for example following attenuation, has the potential to increase the risk of scour/erosion within the watercourse(s) as in many areas they are steep and narrow”

“Planning policy requires developers to mitigate this by intercepting and retaining the first 5mm of rainfall. Given the cohesive nature of the underlying geological deposits locally, this may prove very difficult to achieve”

“Following the development of a site surface water runoff should be reduced to mimic the greenfield scenario both in terms of volume and discharge rate. Preliminary calculations suggest that this would require in the order of 25,000 to 30,000 cubic meters of storage. This estimation is based on 600 proposed dwellings as indicated by the “Wolsey Grange 2 - Vision Document””.

“Any increase in the housing density/number of dwellings proposed would result in an increase in the required storage volume”

“On reasonably flat sites this storage can be provided fairly easily and can add wider ecological benefits however in this case, the sides of the valley are steep in places and above ground storage of surface water will require significant quantities of cut and fill to create the required contours/storage areas. The risk of storing large water quantities in this way, as shown within the developer’s ‘design rationale’ section has the potential to significantly increase the risk of “flooding from artificial sources” to properties downstream”

“Unless runoff from the proposed development is restricted to greenfield rates or better, low frequency rainfall events/intense storms are likely to result in surcharging. The anticipated effects of climate change on rainfall will only exacerbate this risk”

Attention is also drawn to page 50 of the HIA, which includes a section drawing of one of the attenuation basins based both upon the existing topography and on the siting and extent of the residential areas and attenuation basins as shown on the indicative layout for ‘Wolsey Grange 2’. It should be noted that this section drawing is based upon a proposal for 600 dwellings, whereas the allocation seeks to promote 1100 properties here. Therefore, in accordance with the JPC comments, there would be vastly more capacity required than that modelled in the sectional drawing shown in the HIA.

As can be seen, even with attenuation provision relative to a scheme of 600 dwellings, the impacts of those works is significant. They would affect the landscape, landform and heritage in visual terms, as well as requiring significant engineering to make them suitable and safe. The risks to my clients’ property are easy to recognise, with that attenuation basin lying immediately upgradient of Red House such that any overtopping would potentially flow towards the property. The basin would require a ‘cliff face’ of approximately 12m in depth, which is clearly not feasible. The cross section demonstrates that this location is a poor choice for an attenuation basin of this size.

That said, there are five more basins indicated on the WG2 plan. It is wholly unclear where attenuation basins to accommodate 1100 homes would be delivered, given the topography of the land, existing flooding issues and the landscape and heritage constraints already identified. It is my clients’ view that the scale of development proposed within the LA013 allocation is simply not achievable. There are simply too many constraints and issues that counteract and compete to make such a quantum of development entirely undeliverable.

My clients consider it likely that any large-scale development of the valley will cause a detrimental impact on the natural movement of surface water, the watercourses which convey runoff through the valley and the level of flood risk to properties downstream. They have sought expert opinion on this subject that has confirmed that there are significant risks associated with such an extensive

development in this location, and it is wholly inappropriate to allocate this land for development without confidence that this risk can be mitigated.

Deliverability

Chapter 3 of the NPPF addresses the matter of Plan-Making. Paragraph 16 identifies that *“Plans should;b) be prepared positively, in a way that is aspirational but deliverable.....c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”*.

My clients do not consider that the plan is deliverable. It is clear that the Council’s distribution of new homes across the period 2018-2036, as set out in the plan, is heavily reliant on the delivery of 1100 homes on this land. In itself, this allocation provides for approximately 12% of the entire proposed delivery in the Babergh District.

Following their attendance at the Taylor Wimpey presentation evening on 17th September 2019, my clients are aware that the proposals being presented by Taylor Wimpey do not align with the allocation. A significantly reduced number of dwellings are being proposed relative to what the allocation identifies, which raises questions as to the understanding between the LPA and Taylor Wimpey as to the effects of the proposed development and the delivery of the plan.

Indeed, questions are raised as to the issue of prematurity. The NPPF identifies that *“arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:*

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”*.

However, in the circumstance where the proposed development seeks to deliver vastly less development than that which the plan seeks to allocate, there is clearly a fundamental disjunct

between the proposal and the planned allocation. The plan relies on the delivery of 1100 dwellings on this site, having stepped away from the delivery of ‘contingency sites’ as the preferred option in the Issues and Options consultation carried out in the autumn of 2017, whereby a reduction of the number of properties being proposed (which it is understood to be in the region of 400 dwellings) is so fundamental to the plan making process that it would result in the need for additional sites to be found. Indeed, it is akin to the loss of a whole year’s worth of housing delivery based on the evidence provided in the table on page 24 of the emerging plan, as replicated below.

| Local Authority | Standard Method Total (2018 – 2036) | Annual Local Housing Need Target |
|--|-------------------------------------|----------------------------------|
| Babergh | 7,560 | 420 |
| Mid Suffolk | 10,008 | 556 |
| <i>Ipswich Housing Market Area Total</i> | 35,334 | 1,963 |

My clients consider that the recognition by the developer that the site cannot accommodate the delivery of the quantum of housing set out in the plan gives credence to their concerns as to the impacts of the proposed development and the physical constraints upon it. Whilst my clients clearly do not suggest that the site/land can accommodate the number of units proposed by Taylor Wimpey, it is supportive of their case that a major housebuilder such as this is not seeking to create the amount of development that the Council consider can be provided. It is suggested that perhaps Taylor Wimpey’s own investigations of the capacity of the site have highlighted that trying to deliver the proposed allocation numbers would be highly undesirable given the sensitivity of this site to development of this scale, and the failure by the Council to properly assess the constraints of this site as shown within the submitted Landscape Appraisal and HIA.

Whatever the reason, the disconnect between the proposed allocation and the imminent planning application demonstrates that the proposed allocation is significantly flawed. The effect of this flaw, given the fundamental importance of delivery of this proposal to housing delivery in Babergh, demonstrates that the proposed allocation is not sound.

Summary of Objections

Dr and Mrs Brennand have set out clear and evidenced reasoning as to why the proposed allocation LA013 promotes the development of land that is a valued landscape and which sits in a historically sensitive location.

They have supported their objections with a Landscape Assessment by Alison Farmer Associates, who produced the Settlement Sensitivity Assessment that the Council has published in their package of documents that has led to the production of the Preferred Options (Reg 18) plan. The Landscape assessment sets out why large areas of the proposed allocation site is highly sensitive to new development and recommends development of only part of the allocated land. It also identifies direct conflict with emerging policy LP18, and thereby demonstrates that the allocation is not consistent with the Council's own aims set out through their specific policies in the emerging plan.

Dr and Mrs Brennand draw specific attention to the findings of the Landscape Appraisal at paragraph 6.5, which states;

“Even if development could be accommodated on the valley sides through mitigation (which is questionable) no amount of mitigation planting would address the fundamental change to the rural character of the valley landscape which forms the setting and context to Red House and more broadly to the southwest fringes of Ipswich”.

The Landscape Assessment supports the position taken by Babergh District Council in the 1987 Public Inquiry, where the Council were steadfast in their belief that this land should not be developed, that the landscape here was highly important and that it would adversely affect important views and vistas on this approach to Ipswich. That position has not changed. There are more suitable, vastly less sensitive, sites identified in the Council's own Settlement Sensitivity Assessment that could accommodate housing without the need to develop this land.

Furthermore, the Council's Heritage and Settlement Sensitivity Assessment does not consider this land at all, and there is a lack of evidence as to how the Council have reached the conclusion (set out in the Sustainability Appraisal) that the proposal would give rise to positive impacts in this regard. The submitted HIA demonstrates why the majority of the LA013 land would result in significant adverse

impacts on heritage assets adjacent to the land. The impacts upon Red House Farm and Chantry Park were considered in the 1987 Public Inquiry where, in accumulation with the landscape impacts, the benefits resulting from 1600 homes was not found to outweigh the harm. The plan-making process requires the same approach to protecting and enhancing heritage assets as is operated through the decision making process, and the absence of evidence in the Council's documentation is both alarming and flawed.

Furthermore, my clients have evidenced the extent to which drainage proposals for a development of this nature are not deliverable. The extent of work required to deliver the necessary attenuation (albeit that it is evidenced that such attenuation is highly unlikely to be deliverable) would give rise to vast areas of cut and fill that, in itself, would significantly and adversely harm this valued landscape and the heritage assets that lie within it.

The significant doubt that exists as to the deliverability of an allocation of 1100 dwellings on this land is borne out by Taylor Wimpey's recent public exhibition. The developer is promoting a proposal of 700 properties, equivalent to 63% of what the Council is seeking to deliver here. There is a significant, and now public, disconnect between what the Council are seeking to achieve and what the developer considers can be delivered. My clients do not need to speculate as to why this may be, the simple fact that there is such a variance makes the proposed allocation flawed.

For all of these reasons, my clients consider that there are clear and recognisable flaws in the Council's evidence base, that there is no sound reason to step away from the position taken by the Planning Inspector who previously considered this land should not be developed and that they have presented to the Council evidence from expert sources that demonstrates why the proposed allocation is unsound. Further, as the allocation is suggested by the Council to form such a significant part of the Council's housing delivery over the plan period, it thereby follows that the plan is based on an unsound principle and should not be taken forward in its current form.

Yours sincerely

Ben Elvin MSc MRTPI

Ben Elvin Planning Consultancy

Enc.

Cc: Dr and Mrs Brennand
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