



Appeal Decision

Inquiry Held on 10, 11, 12 and 13 December 2019 and 10 January 2020

Site visit made on 10 January 2020

by L Perkins BSc (Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 5 February 2020

Appeal Ref: APP/W0340/W/19/3234882

Land at Junction with Clayhill Road and Sulhamstead Road, Burghfield, Reading, Berkshire

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Spitfire Properties LLP and JPP Land Ltd against the decision of West Berkshire Council.
 - The application Ref 18/03014/OUTMAJ, dated 31 October 2018, was refused by notice dated 14 February 2019.
 - The development proposed is: The erection of 40 dwellings (24 market and 16 affordable), together with access (both vehicular and pedestrian) to Clayhill Road, provision of open space and landscaping.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The address provided on the application form is incomplete and so I have used the address provided on the appeal form which is consistent with the address used by the Council on the decision notice.
3. The proposal has been made in outline and approval is sought only for access. Appearance, landscaping, layout and scale are reserved for future consideration.
4. In the overarching statement of common ground the main parties agreed that, subject to planning conditions, the appeal scheme is capable of complying with planning policies in respect of drainage, due to the receipt of additional information received since the Council decided the application. As a result, no evidence on drainage was given at the Inquiry. There is no evidence to indicate this matter could not be addressed by planning conditions and so there is no need for me to consider this matter further.
5. Since the application was decided by the Council the National Planning Policy Framework (the Framework) has been revised. I have taken any comments made on relevant implications for the appeal into account in my reasoning.

Main Issues

6. The main issues in this appeal are:

- the effect of the proposal on the Council's strategy for the location of development;
- the effect of the proposal on the character and appearance of the area;
- the effect of the proposal on biodiversity; and
- whether an appropriate mechanism is in place to ensure the proposal would deliver affordable housing, mitigation and compensatory measures required to satisfy planning policies.

Reasons

Strategy for the Location of Development

7. Policy ADPP1 of the West Berkshire Core Strategy 2006-2026 (the Core Strategy) envisages that main urban areas will be the focus for most development with the majority of development taking place on previously developed land. The policy states that most development will be within or adjacent to settlements specified in a settlement hierarchy, and related to transport accessibility and their level of services and the availability of suitable sites for development.
8. The appeal site is an undeveloped parcel of land in a rural area. It is not within or adjacent to any of the settlements specified in the settlement hierarchy. It is within the East Kennet Valley where Policy ADPP6 of the Core Strategy envisages relatively low growth to reflect its more limited services and poorer transport connections. The policy identifies the two rural service centres of Burghfield Common and Mortimer as the focus for development in this area, together with the more modest development of the identified service village of Woolhampton. The appeal site is not within any of these locations.
9. Policy CS1 of the Core Strategy states that provision will be made for the delivery of at least 10,500 net additional dwellings over the period 2006 to 2026 with delivery phased and managed in order to meet at least an annual average net additional dwelling requirement of 525 dwellings per annum and to maintain a rolling five year supply of housing land. When adopted in 2012, the policy envisaged that an update of the Strategic Housing Market Assessment (SHMA) would be undertaken within 3 years and that if the updated SHMA indicated a need for greater housing provision a review of the scale of housing provision in the Core Strategy would be undertaken.
10. Consistent with the aforementioned policies, Policy CS1 states that new homes will be located in accordance with the settlement hierarchy, primarily developed on suitable previously developed land within settlement boundaries, on other suitable land within settlement boundaries, on strategic sites and broad locations identified on a Core Strategy Key Diagram, and, on land allocated for residential development in subsequent Development Plan Documents. The appeal development does not reflect the strategy described in Policy CS1.
11. Policy C1 of the Housing Site Allocations Development Plan Document 2006-2026 (the Site Allocations Plan) contains a presumption in favour of development within the settlement boundaries of specified settlements, none of

which include the appeal site. The policy also contains a presumption against new residential development outside of settlement boundaries and the appeal site is outside of a settlement boundary. The policy includes exceptions to this presumption but none of the exceptions are applicable to the appeal proposal.

12. Taken together, the above policies constitute the Council's strategy for the location of development. In my judgement, the proposal, overall, does not comply with this strategy but would instead result in harm in achieving the planned strategy. I therefore conclude the appeal proposal conflicts with Policies ADPP1, ADPP6 and CS1 of the Core Strategy and Policy C1 of the Site Allocations Plan, when read together.

Character and Appearance

13. The appeal site is an undeveloped parcel of grassland which sits in an open rural landscape to the west of the rural settlement of Burghfield Village. Burghfield Village has a linear settlement pattern, with homes built along the main roads through the village i.e. Reading Road, Theale Road and Sulhamstead Road. These roads converge in the centre of the village to form a triangular recreation ground. The village sits in open countryside. This is clearly apparent on the approaches into the village. The linear settlement pattern allows views between buildings, across the village to the open countryside that surrounds it.
14. When leaving the village on Sulhamstead Road, the road splits in two to form Clayhill Road which leads to the separate settlement of Burghfield Common. The appeal site occupies a wedge of land between Sulhamstead Road and Clayhill Road. It is surrounded by hedgerows and forms part of a mosaic of fields surrounding the village which are separated by landscape features consisting of hedgerows and mature trees. As such, the site contributes to the local landscape character which is described within the West Berkshire Landscape Character Assessment 2019 (the LCA). There are views across the site, including looking southeast from Sulhamstead Road to the wooded hillside at Hillfields.
15. There is a significant distance and expanse of countryside between Burghfield Village and Burghfield Common. Consequently, these read as discrete settlements. They also have different characters. Burghfield Common has an estate-style development pattern compared to the linear development pattern of Burghfield Village. Saxon Gate and Mundy Close are a cul-de-sac of homes accessed from Clayhill Road. They sit adjacent to the side of the appeal site furthest from Burghfield Village. Elm Drive is a further cul-de-sac, accessed from Clayhill Road, further away from Burghfield Village. It leads to an estate-style development of homes.
16. The above cul-de-sacs are not within Burghfield Common. But they do not read as part of Burghfield Village either. They are distinctly separate from it but their estate-style built form reflects that of Burghfield Common rather than Burghfield Village. The above cul-de-sacs were approved during a different planning policy context and on previously developed land, including a poultry unit and a Ministry of Defence development. In this respect, the circumstances of these developments are not comparable to those of the greenfield appeal site. These cul-de-sacs appear as anomalous developments in otherwise open countryside. The appellant considers Saxon Gate and Munday Close dominate the backdrop of views from existing homes on Sulhamstead Road. But in my

judgement, this is not the case given they occupy only a limited part of an oblique view from the existing homes on Sulhamstead Road.

17. Based on my observations from my site visit, the entry point into Burghfield Village from Clayhill Road is the point where it joins Sulhamstead Road. In this respect, the appeal site is not within Burghfield Village and contributes significantly to the visual gap between Burghfield Village and Burghfield Common, notwithstanding the presence of the cul-de-sacs described above.
18. Whilst the appeal proposal has been made in outline, the submission documents and quantum of development proposed indicate that it would likely comprise an estate of homes. At the Inquiry the main parties agreed the proposal contemplates a development of two storey buildings with pitched roofs. To that extent, the height of the buildings proposed would broadly reflect that of neighbouring homes. But there is no evidence the proposal would or could follow the existing linear pattern of Burghfield Village.
19. The main parties agree that views of the site are well contained. However, the appeal site has a domed profile. As such, a significant part of it is raised up from the roads running along its edges. In terms of visual impacts, this means the appeal development would be prominent when viewed from the neighbouring roads and homes, particularly the roofs and gable-ends of the homes proposed. There is no evidence this would not be the case or that the 'dome' of the site would remain undeveloped as a result of this proposal. The change from undeveloped grassland to an estate of homes would be significant.
20. Due to the height of hedgerows around the site compared to the height of the proposed development, I am not satisfied hedgerows would sufficiently mitigate the visual impact described above. Nor, based on the information available, am I satisfied other planting would mitigate the effect either. Moreover, the removal of scrub from behind hedgerows, to accommodate the development, would make it more likely the development would be seen, particularly in the winter months. In any event, some of the hedgerow around the site is not within the site boundary and so would not be maintained as part of the development and planting cannot mitigate against the site having an open character. This would be lost as a result of the development.
21. The appeal development would involve the construction of homes on land which is between existing homes at Saxon Gate, Mundy Close, Sulhamstead Road and Bedford Cottage. But in my judgement, this does not make the appeal development an 'infill' development as is suggested by the appellant, given the significant size of the appeal site, the quantum of development proposed and given open countryside is prevalent along two of its edges.
22. Development of the appeal site would physically merge the linear development of Burghfield Village with the estate-style development of Saxon Gate, Mundy Close and the homes beyond. This would result in coalescence between these developments and significantly reduce the gap in development which exists between Burghfield Village and Burghfield Common. As a result there would be a loss of their separate identities and a merging of these two development patterns. This would result in a harmful visual impact.
23. The main parties disagree on where the 'gap' is between Burghfield Village and Burghfield Common. A reduction in the gap would occur as a result of a housing development proposed on a site known as BUR015 from the Site

- Allocations Plan. But the gap would be further visually reduced as a result of the appeal proposal. The difference between these two scenarios is that development on BUR015 would be as a result of a plan-led system endorsed by the Framework, whereas development on the appeal site would not.
24. In respect of landscape impacts, the appeal scheme would result in the loss of hedgerow (to accommodate the proposed access) and the loss of grassland. Currently, the grassland affords views across the site including from Sulhamstead Road. It would be replaced by housing with some open space. Whilst these landscape effects may not be substantial, they would overall still be harmful, at year 1 or year 15.
25. I accept the appeal scheme would include landscape improvements. But I do not accept these would result in an improvement to the landscape overall. The appeal scheme would change an open field with longer uninterrupted views to the surrounding wider countryside, to a two storey housing development. This would be incongruous in this context, would result in the suburbanisation of the rural landscape character and the rural setting of Burghfield Village and contribute to the coalescence of settlements. This does not comply with the LCA.
26. The main parties agree the appeal site is not a 'valued' landscape for the purposes of paragraph 170 (a) of the Framework. However, paragraph 170 (b) seeks that planning decisions should recognise the intrinsic character and beauty of the countryside. There is disagreement between the main parties over what this entails. Whilst the appeal site may be 'ordinary' countryside which may not justify the same level of protection as designated areas, this does not mean it is removed from protection altogether. In my judgement, by reason of the harm identified above, particularly relating to development form, prominence and coalescence, the appeal proposal does not recognise the intrinsic character and beauty of the countryside and so is contrary to the Framework in this regard.
27. Paragraph 171 of the Framework seeks that development plans should distinguish between the hierarchy of international, national and locally designated sites. The appeal site is not subject to any such designations, nor are there any in the Council's area. But that does not make the appeal proposal acceptable in terms of its effect on the character and appearance of the area, in light of the harm identified above.
28. Having considered all of the evidence provided and having visited all of the viewpoints identified by the parties, I conclude the appeal development would cause significant harm to the character and appearance of the area. As such, it would not comply with Policies ADPP1, ADPP6, CS14 and CS19 of the Core Strategy, and Policy C1 of the Site Allocations Plan or the design policies of the Framework. Together these seek high quality development, focussed within existing settlements, which follows the existing settlement pattern, and which respects, conserves and enhances the character, landscape and appearance of the surrounding area.

Biodiversity

29. During the Inquiry the appellant submitted a discrete biodiversity planning obligation dated 13 December 2019, committing to the payment of an 'impact mitigation contribution' for expanding or improving biodiversity habitats within

- the vicinity of the site. The sum was agreed between the Council and the appellant and was reflected in a concurrently submitted biodiversity statement of common ground.
30. Consequently, the Council confirmed that its reason for refusal in respect of biodiversity had been overcome and was no longer pursued and nor was the biodiversity compensation element of its fifth reason for refusal. As a result, no evidence in respect of biodiversity was presented at the Inquiry by biodiversity witnesses for the Council or the appellant. However, a dispute has remained between the main parties over the scale of the biodiversity net gain in this case and therefore, the extent to which biodiversity is a matter in favour of the scheme.
31. The appeal site previously contained a traditional orchard which was cut down in January 2016. This was prior to the submission of the planning application in October 2018 and, the evidence indicates, before the appellant was aware of the site. The PPG¹ states that the existing biodiversity value of a development site needs to be assessed at the point that planning permission is applied for. The appellant therefore considers the former orchard should not be counted in calculating the baseline biodiversity value of the site and that the correct baseline is the site as it is now, absent of the former orchard.
32. However, the PPG² also states that it may be relevant to consider whether any deliberate harm to biodiversity value has taken place in the recent past, and if so whether there are grounds for this to be discounted in assessing the underlying value of the site (and so whether a proposal would achieve a genuine gain). The Council considers the biodiversity value of the site should take account of the former orchard because it was deliberately removed (albeit by a previous owner). The PPG makes no provision for deliberate action to be discounted if the land is sold, as is the case here. I agree with the Council that to include such provision would make the guidance meaningless.
33. The information available to me indicates the former orchard was priority habitat, as defined in the Framework. Evidence given by Dr Cartwright indicates the orchard was the single largest remaining orchard in Berkshire and that such an orchard is species rich, at least in part due to being well-established. However, there is no agreed calculation in terms of the effect on biodiversity in this case overall. The agreed compensation payment described above does assume the baseline takes account of the former orchard although the appellant contests that this is the correct approach to take.
34. There is no practical prospect or means of restoring the former orchard, absent of a scheme such as that which is the subject of this appeal. This was confirmed by Dr Cartwright during the Inquiry. The evidence indicates the former orchard was 0.55 ha in size and was unmanaged. Its loss was not consequent on a grant of planning permission. The proposal includes 0.82 ha of orchard and a management regime for it. But qualitative and quantitative factors are relevant in considering the overall net effect in terms of biodiversity, including the extent to which a habitat has been established and, by implication, is more species-rich.

¹ Planning Practice Guidance: Natural Environment, Paragraph: 026 Reference ID: 8-026-20190721

² Ibid

35. In this case, the proposed orchard would serve a dual purpose as biodiversity mitigation and publicly accessible open space. Concern was expressed at the Inquiry that this may compromise its biodiversity value. Considering all of the above points, whilst the biodiversity reason for refusal has been overcome, I am not satisfied that biodiversity overall is a matter which weighs heavily in favour of the scheme, particularly in light of Dr Cartwright's evidence and the site's recent history.
36. Based on the information available to me, the biodiversity payment is compensation and not a benefit of the scheme. This payment is necessary to make the development acceptable in planning terms and to comply with Community Infrastructure Regulation 122. Whilst other biodiversity improvements are proposed, in my judgement they are minor in relative terms and must be weighed as such in the planning balance.

Mechanism for Affordable Housing, Mitigation and Compensatory Measures

37. During the Inquiry, the appellant submitted another planning obligation, also dated 13 December 2019, to secure the delivery of affordable housing, public open space and travel packs. The Council and appellant also agreed a set of planning conditions which could be imposed if permission were granted, to secure other matters such as highway works, identified in the Council's fifth reason for refusal.
38. Consequently, the Council confirmed that its fifth reason for refusal had been overcome and no evidence in respect of this main issue was presented at the Inquiry by the Council or the appellant. It was also confirmed at the Inquiry that other financial contributions, including for health and education, would be secured by the Community Infrastructure Levy after the floorspace of the development was known. I have no reason to disagree with the Council's position in respect of this main issue and I am satisfied the above planning obligations are necessary and comply with Community Infrastructure Regulation 122. As such, there is no need for me to consider this matter in any further detail.

Planning Balance

39. It is common ground between the main parties that the Council is currently able to demonstrate a minimum five year housing land supply. The Council consider this supply is between 7.5 and 8 years. However, for the purposes of paragraph 11 of the Framework, the appellant considers the policies which are most important for determining the application are out of date. That being the case, paragraph 11 (d) of the Framework would be engaged and permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
40. The policies which are most important for determining the application are agreed as Policies ADPP1, ADPP6, CS1, CS17 and CS19 of the Core Strategy and Policy C1 of the Site Allocations Plan. The Council does not agree these policies are out of date. Policies ADPP1, ADPP6 and CS1 of the Core Strategy were based on a housing requirement figure of 10,500 over the plan period, derived from the now abolished South East Plan. The associated net additional dwelling requirement per annum figure was 525.

41. The Core Strategy was found sound and adopted after publication of the 2012 Framework, with modifications from the Inspector to make clear that the 10,500 figure is a minimum and not a ceiling and that a review of housing provision was required. That review was to consist of an update of the Strategic Housing Market Assessment (SHMA) and, if that review indicated housing provision needs to be greater, a review of the scale of housing provision in the Core Strategy will be undertaken.
42. The SHMA review was later than the Core Strategy Inspector said it should be but the Council has done what was required of it by the Inspector and a new development plan is being developed. Whilst the figure of 10,500 is out of date, this does not mean the associated policies are out of date, as the figure was prefaced by the phrase "at least", building flexibility into the relevant policies. Moreover, the evidence indicates that even with a higher objectively assessed need figure of 665 dwellings per annum, policies for the supply of housing have been found up to date by other decision makers³ referred to in the evidence. There is no evidence that satisfies me that I should take a different view and in the context of a healthy five year housing land supply, I consider Policies ADPP1, ADPP6 and CS1 of the Core Strategy are not out of date.
43. Policy C1 of the Site Allocations Plan controls housing in the countryside and makes provision for exceptions so I do not consider it to constitute blanket protection from development. The evidence is clear that previous decision makers⁴ referred to in the evidence have found that the intention to protect rural areas by restricting development outside settlement boundaries is not inconsistent with the Framework. I see no reason to disagree with their findings, notwithstanding that these findings were based on the 2012 Framework and not the current version. Both versions seek that planning decisions should recognise the intrinsic character and beauty of the countryside and so the 2019 version of the Framework is no different in this regard.
44. My attention has been drawn to the judgement in *Eastleigh Borough Council v SSCLG* [2019] EWHC 1862 (Admin). But I am not satisfied this makes any material difference in this case as different circumstances were in play in that case, including that the Council had achieved its five year housing land supply by granting permissions which were contrary to policy. Moreover, there is nothing in the 2019 Framework to indicate that the definition of settlement boundaries is no longer a suitable policy response and therefore that such policies are bound to be out of date having regard to paragraph 213 of the Framework. Considering all of the above points, in my judgement Policy C1 is not out of date.
45. The appellant considers the wording of Policies CS17 and CS19 is not consistent with the Framework. But consistency does not mean every word must be the same, it depends on the specific terms of the policy and the corresponding parts of the Framework when read in their full context.
46. The text in Policy CS17 was adopted after the 2012 version of the Framework and so I have no reason to believe it was not consistent with it. In respect of biodiversity assets and the determination of planning applications, both the 2012 version of the Framework and the current version contain the same wording that planning permission should be refused if significant harm would

³ APP/W0340/W/16/3146156, APP/W0340/W/16/3153899

⁴ APP/W0340/W/15/3141449, APP/W0340/W/16/3144193, APP/W0340/W/16/3153899

result. I am therefore not satisfied that Policy CS17 is out of date or inconsistent with the Framework, despite being drafted before it or the 2012 version.

47. Policy CS19 was formulated in the context of the housing requirement figure of 10,500 in Policy CS1 discussed above. But that in itself does not render Policy CS19 out of date and nor, in my judgement, does the wording of Policy CS19 either. There is no evidence in this case which satisfies me Policy CS19 is out of date. I consider this policy is consistent with the policies of the Framework insofar as they relate to character and appearance.
48. As is made clear in the Framework, the Government has an objective of significantly boosting the supply of homes. To support this, it is important that a sufficient amount and variety of land comes forward where it is needed. The Council has a five year supply of housing land and has put resources into its Site Allocations Plan to ensure a sufficient supply in the short to medium term.
49. The appellant considers the Council will not be able to maintain a five year housing land supply into the future and at the Inquiry undertook an exercise⁵ to demonstrate this. However, there is no guidance on how such an exercise should be done so I consider these projections to be speculation. It is not a requirement of the Framework or Planning Practice Guidance to calculate a rolling five year housing land supply several years into the future. The reference in Paragraph 67 of the Framework relates to plan making and paragraph 67 (b) relating to years 6-10 is for developable⁶ sites or broad locations for growth, not specific deliverable⁷ sites, as is the case for years one to five of the plan period.
50. I acknowledge there are benefits of the scheme. These include the provision of new housing, including affordable housing, to which I give significant weight. In addition, economic benefits would arise, including from jobs created temporarily during construction and a likely increased demand for local services generated by new housing. However, other housing schemes that would come forward through a plan-led approach would generate the same benefits and so I give these economic benefits moderate weight.
51. Some public open space would be provided although I note this is only marginally over what the Council's policy requires and so this is a minor benefit which I give limited weight. As noted above, biodiversity improvements are minor and so I give them limited weight. There would be some highway improvements arising from the development but in my judgement, these are mitigation rather than a benefit and so I give these limited weight.
52. The site is considered to be sustainably located in terms of its proximity to services, facilities and transport routes. But this should generally be the case for all housing development, particularly where the Council can demonstrate a five year housing land supply. Therefore I consider this a neutral point rather than a benefit and so I give it limited weight.
53. I give significant weight to the harm identified above, particularly the effect on the character and appearance of the area. Whilst the visual impacts would be relatively localised, the degree of change would be high and would cause

⁵ Inquiry Document 13: Table 4A

⁶ Specifically defined in the Framework

⁷ Specifically defined in the Framework

significant harm. In my judgement, the benefits of the scheme do not outweigh the identified harm and the associated conflict with the development plan, when read as a whole. Consequently, there are no material considerations that outweigh the development plan conflict.

54. In my judgement, the most important policies for determining the application are not out of date and paragraph 11 (d) of the Framework is not engaged. However, even if I am wrong in this regard, in my judgement, the adverse impacts of granting planning permission, particularly the effect on the character and appearance of the area, significantly and demonstrably outweigh the benefits of the appeal scheme when assessed against the policies of the Framework taken as a whole.

Conclusion

55. For the reasons given above I conclude that the appeal should be dismissed.

L Perkins

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Emmaline Lambert	of Counsel, Cornerstone Chambers
She called	
Liz Allen	West Berkshire Council
Nick Ireland	Iceni Projects
Lydia Mather	West Berkshire Council

FOR THE APPELLANT:

Christopher Boyle QC	of Counsel, Landmark Chambers
He called	
Douglas Bond	Woolf Bond Planning
Andrew Smith	Fabrik

INTERESTED PERSONS:

David Bowen	Local Resident
Dr Samantha Cartwright	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust
Cllr Geoffrey Mayes	West Berkshire Council

DOCUMENTS SUBMITTED DURING THE INQUIRY

- 1 Response to LPA metric
- 2 Winter Verified Visual Montages
- 3 Consistency of Most Important West Berkshire Council policies with the 2019 NPPF
- 4 Email from Bob Dray to Nick Ireland dated 9 December 2019
- 5 *Cawrey Ltd v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council* [2016] EWHC 1198 (Admin)
- 6 Statutory Declaration of Howard Charles Anthony Jones
- 7 Statutory Declaration of David Peter Winston Green
- 8 Opening Submissions on Behalf of the Appellants
- 9 Opening Submission on Behalf of the Council
- 10 Representations of Councillor Graham Bridgman
- 11 Comparison of past and future delivery in West Berks based upon Dec 2018 HLS
- 12 (withdrawn)
- 13 DB Table 4A
- 14 (withdrawn)
- 15 (withdrawn)
- 16 BBOWT Verbal Statement
- 17 Eastleigh Policy 1.CO
- 18 Eastleigh Policy 18.CO
- 19 West Berkshire Proposed Submission Core Strategy Policy CS 18
- 20 Statement of Common Ground for Money Hill development
- 21 Liz Allen Rebuttal to Mr Smith's Evidence
- 22 Letter from Jenny Grote of Sovereign dated 13 October 2016
- 23 Letter from Andrew Lynch of MHCLG to David Jones dated 20 December 2018
- 24 Statement of Common Ground on Biodiversity dated 13 December 2019
- 25 Planning Obligation (#1 affordable housing, public open space, travel packs) dated 13 December 2019
- 26 Planning Obligation (#2 biodiversity) dated 13 December 2019
- 27 Closing Submissions on behalf of the Council
- 28 Closing Submissions on behalf of the Appellants
- 29 Site Visit Itinerary Plan