

Field House  
Ashley Road  
Cheltenham  
GL52 6PH



18<sup>th</sup> November 2018

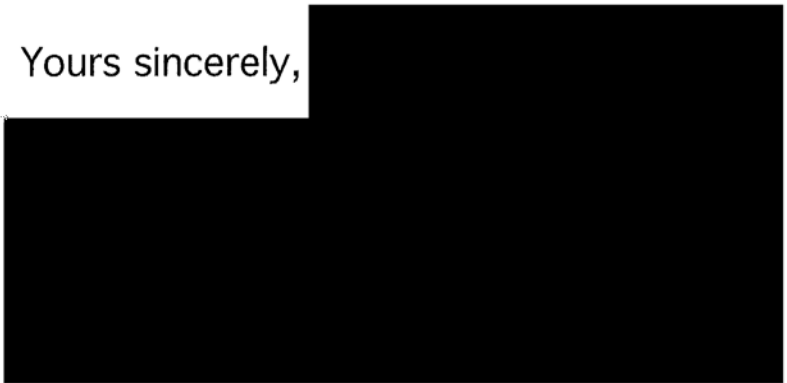
Dear Ms Crews,

**Your re. 18/02171/OUT**

I refer you to the letters of objection I have written previously (as attached) regarding the development of the Land Adjacent to Oakhurst Rise. The comments in those letters still apply regarding this recent application, and I would like the Planning Committee to have access to them when considering this latest application.

I would also like to mention that surely it is possible for the Planning Committee to refuse an application on a permanent basis so that the matter is considered for a final time, regardless of the gradually decreasing number of houses applying to be built. The refusal on grounds of it being a preserved area, the lack of access, the destruction of the wild life habitat and all other comments from other residents etc. apply whether for 69 dwellings as much as for the previous two applications which have already been refused.

Yours sincerely,





Field House  
Ashley Road  
Cheltenham  
GL52 6PH

27<sup>th</sup> February, 2018

Dear Madam

PLANNING REF. 17/00710/OUT

I refer to my previous letter of 8<sup>th</sup> September 2017, (a copy of which is enclosed). The comments we made then still apply and the granting of permission for development of this preserved area in our opinion should not be granted.

Yours sincerely,



Field House  
Ashley Road  
Cheltenham  
GL52 6PH



8<sup>th</sup> September 2017

PLANNING REF 17/00710/OUT

With reference to the above, we wish to object to the application.

I have driven to see for myself the traffic situation at Ewens Farm. There were cars parked along all the associated roads, making them extremely narrow, and especially dangerous during the busy times of the day. The access out of Ewens Farm is either onto the A40, which comes to a complete halt at rush hour; or via King Alfred Way onto Hales Road. It is difficult enough now to get through King Alfred Way with cars parked all over the pavements awaiting repairs at the garage. At rush hour during the morning the traffic along Hales Road down to the London Road traffic lights backs up as far as Battledown Approach and sometimes further. What will happen when you have another 200+ cars trying to filter into these roads. It is no good thinking people will walk or cycle, the majority do not.

The Planning Committee must take this into account. The roads are not designed to take the amount of traffic already using it and planning to build another 100 houses will result in a huge increase in traffic in the Battledown area.

The letter of objection from the resident in Tall Timbers who obviously has detailed knowledge regarding traffic flow, puts the case much more succinctly than I.

Regarding the risk of flooding. We happen to live on the top of Battledown and our house is built on clay soil. Having lived here for many years, I have always been grateful of where we live, having seen the excess rain water flood down the hill, even right through some houses lower down. The building of so many houses and the taking away of permeable green fields could have a direct impact on existing properties.

Battledown is a unique habitat and it is tragic to think that our local flora and wild life would be destroyed if planning was granted.

Whilst I realize that the Planning Committee does not have to take into consideration the other aspects of the result of having maybe 300 other residents in the area. It must be aware that there are not enough doctors, spaces in the local schools, or beds in the hospital for such an increase in population.

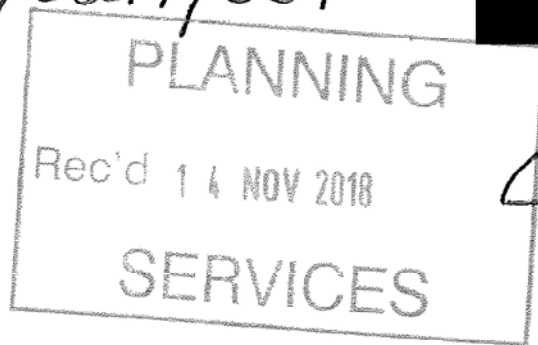
My husband agrees with the content of this letter, and hence we wish it to count as two objections, not one.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.



Ref No:- 18/0217/OUT



8 PINE CLOSE  
Charlton Kings  
Cheltenham  
GL52 6JR

13<sup>th</sup> November 2018

Dear Tracey Crews,

I am writing to you regarding my concerns with reference to a submitted planning application for sixty nine dwellings on land adjacent to Oakhurst Rise. Less than four months ago, planning permission for ninety houses was refused on multiple grounds. None of these core issues have been addressed.

The main issue is that Oakhurst Rise is a small cul de sac with an extremely steep entrance road that would be the only access road to/from the

proposed site. It is too narrow for two way traffic impassable during freezing weather and snow. The road that approaches Oakhurst Rise and is the only access road to the cul de sac also freezes in the winter months, cars are often abandoned on this road as they are unable to ever reach the steeper Oakhurst Rise slope. Surrounding roads are completely inadequate to cope with the extra amount of vehicles expected. The traffic impact would be huge for this small estate.

The planners want to concrete over acres of permeable green fields which will only increase the risk of flash flooding. We narrowly escaped flooding in 2007 when huge amounts of water ran down our back garden's bellow

The St Edward site.

Building on this green site will have an impact on our flora and fauna also.

The destruction of organic meadows ancient hedgerows, protected Oaks and a large amount of well established trees. There are badgers' setts that have been there for hundreds of years, newts, bats, slow worms, adders, deer and dozens of bird species. The destruction of this unique habitat would have a huge impact on our already depleted wildlife in this country.

We have been advised that ~~the~~ the school and GP places, along with construction phase noise, will not be considered, though these are also weighty issues. This is a deeply flawed planning application which would destroy this small community. We hope that our voices will be heard again

And that common sense will prevail.

Yours sincerely,



Flat 4

35 St Georges Road

Cheltenham

GL50 3DU

To whom it may concern

Cotswold Transport have written to CBC (Letter dated 7 Dec 2018 but only just made public via the planning portal).

They claim that 'Transport Assessments submitted with both the 2017 and 2018 planning applications have demonstrated that a suitable range of services and amenities exist within appropriate walking and cycling distances of the application site, as defined by regional and national guidance. This has been accepted by GCC and is not called into question by the objector.'

Unless it is not clear, one member of the public does not constitute all objections to the site. Numerous (less technically qualified, but equally concerned) residents have explained, in detail, why they are concerned about the gradient and the claims made in the application about the transport plan. The simple fact is, despite one refused application and months of debate and objection, the data in the CTP paperwork is factually inaccurate.

Friends of Charlton Kings submitted the following data as part of their objections to the last proposal, and those concerns remain extant. They noted that:

"It claims the approximate distance from the site to the co-op (as one example) is 790 metres - or 9.25 minutes walk.

We sent a 15 year old double county athletics champion around the proposed layout, ensuring he was walking at a pace above that claimed in the plan (despite the 1:11 climb in places).

The attached are his tracks off a skiing app which measures time and altitude. For the avoidance of doubt, the walk is 1100 metres. **It took him 13.29 minutes to walk there, 14.28 minutes to walk back. [This is outside of the government recommended walking and cycling distance for local amenity].**

Please can you add the appropriate error margin to all the transport data - it under estimates all distances by at least 20%, and all times by an error margin of 33%

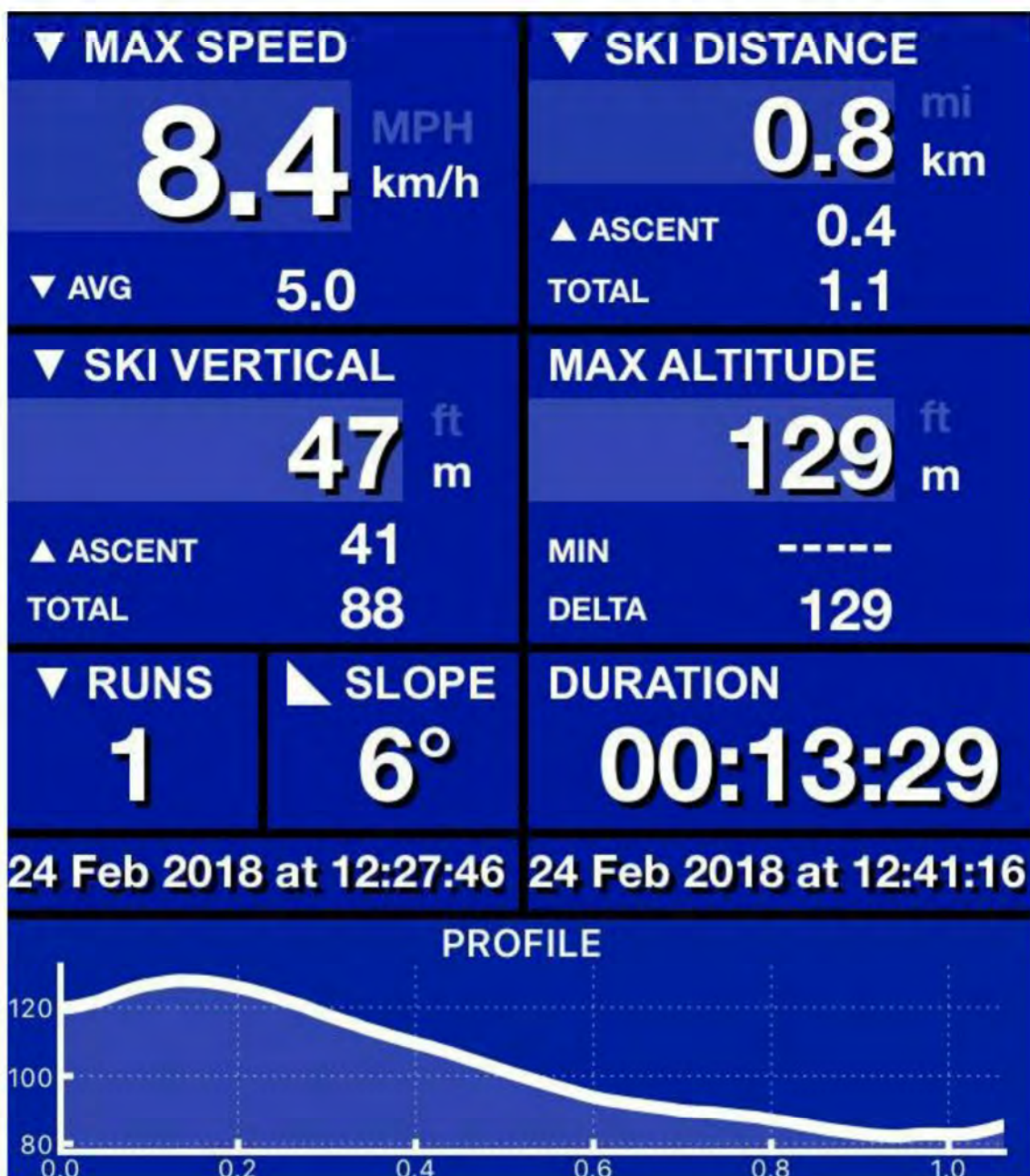
We are still waiting on a highways report, but note that no work has yet been done on transport data within Ewens Farm, which is the key bottleneck - and that the comparison data in the transport plan is for a dual carriageway. It is completely irrelevant to the traffic flows in Charlton Kings.

As you can see all of these distances are significantly different from the informed estimated by the developers consultant and also further than the guidelines allow. Always convenient that where things are an issue they are estimated and where they are not they are actual! We have found this on many of the reports so far and as mentioned my concerns are that the information being used by the likes of yourself and others is incorrect and the reports get compounded inaccuracies throughout.

As mentioned there are statements that local schools are already over capacity and there are no plans for further schools close to the site. The distances from the site to the schools as stated by the applicant are incorrect.

I really appreciate your time to look at this and as no mention of gradients are in the GCC report perhaps you could add these and the recommendations or guidelines on what they should be? Residents are concerned that a 'sustainable' transport plan that depends on people cycling is unrealistic when the incline is one that would challenge a pro.

Two other points; residents have measured the existing road and it isn't as wide as is claimed. And 3 rejections for this site in the 1980s said that the London Road was already close to capacity – that was over 40 years ago!"







Those comments have just been ignored for nigh on 3 years, and yet consultants are being paid to argue that all is well. Until this application is sound in fact, this is an exercise in Amazon rainforest destruction, not in credible arguments about planning policy.

Yours faithfully,

[Redacted signature]



# LAND OFF OAKHURST RISE, CHELTENHAM



## ARBORICULTURAL REVIEW

Prepared for: The Friends of Charlton Kings

Prepared by: Paul Barton

18 January 2019

Project reference: F.2622



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## Instructions

Received from [REDACTED], resident of Charlton Manor, Ashley Road, Cheltenham, on behalf of the community group 'Friends of Charlton Kings'.

Terms of reference: to review the submitted planning application regarding land off Oakhurst Rise, Charlton Kings, Cheltenham (ref: 18/02171/OUT) and provide a statement commenting on the arboricultural elements of the development proposal. This follows a similar instruction to comment on a previous application (ref: 17/00710/OUT) that was refused in July 2018 due to the loss and negative impacts to protected and veteran trees.

## Scope of work

The scope of my instructions are to:

- visit the application site to familiarise myself with the trees and site context,
- review the arboricultural information submitted with the application,
- prepare a report giving an independent view of the impacts of the development proposal on the trees at the site.

## Documents used to prepare this report

In preparing this report, the following documents have been obtained from the Cheltenham Borough Council website:

- Proposed site layout - drawing no: PL005 Rev A (October 2018)
- Arboricultural report - ref: SC38-1036 (October 2018)
- Landscape Strategy plan - drawing no: 18125.191 Rev D (October 2018)

A copy of the relevant Tree Preservation Order (TPO) (No.1, 1981) was also obtained from the Cheltenham Borough Council tree officer.

## Summary

The revised planning application for a lower density development affords the important trees at the site more space for their continued growth and reduces the potential for ongoing conflicts between future residents and the trees. However, there are still numerous areas where development is proposed within buffer zones around veteran trees and opportunities for as yet unquantified negative impacts to the trees.

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## 1. Introduction

- 1.1. I am Paul Barton, director of Barton Hyett Associates and a professional arboriculturist. I have 14 years experience working in the arboricultural sector and hold a Masters Degree qualification in Arboriculture and Urban Forestry. I am a professional member of the Arboricultural Association.
- 1.2. I have been asked to provide an independent review of the documents submitted to Cheltenham Borough Council (CBC) in relation to an outline planning application for development of an existing field to the north of St Edward's Preparatory School, to the east of Oakhurst Rise, Cheltenham. The outline planning application is for the construction of 69 dwellings consisting of a mixture of house types and flats. The application seeks approval for the proposals access, layout and scale but appearance and landscaping are to be a reserved matter.
- 1.3. A previous outline planning application for 90 units was refused in July 2018. Reasons for the refusal can be summarised as:
  - The loss of significant trees
  - Impact on the setting of nearby listed buildings
  - Impact on local road network and amenity of local residents
  - Negative impact on biodiversity
  - Negative impact on local landscape character.
- 1.4. An arboricultural report prepared by FLAC has been submitted with the new planning application. This includes a tree survey, proposed tree retention and removal plan and an outline tree protection plan.
- 1.5. This review seeks to provide an independent arboricultural viewpoint on the merits and potential impacts of the proposed development on the site's trees. It is not intended to investigate or question the professionalism or competence of the author of the submitted arboricultural reports. I acknowledge that many aspects of arboricultural consultancy are inherently subjective and that there are numerous interpretations of published guidance, recommendations and standards that can affect the conclusions made on a site.



## **2. Method of review**

- 2.1. In order to comprehensively review the planning applications and their impact on trees, I began by obtaining the (previous) development proposal plans and arboricultural report.
- 2.2. Following a desktop review of these documents, an initial site visit was made on 29th March 2018, where I met Mr and Mrs Walker (Charlton Manor) and briefly walked over the site.
- 2.3. Another site visit was made on 17th April 2018 in order to inspect the trees in more detail and review my observations in comparison with the tree survey submitted with the previous application.
- 2.4. This review has been conducted as a desktop study having studied the amended proposal and the arboricultural report and submitted comments which are available for public viewing on the council's online planning application register.

## **3. Review of the submitted arboricultural report**

- 3.1. The FLAC report (ref: SC38-1036, Oct 2018) consists of a tree survey schedule with a key, a tree retention and removal plan and an outline tree protection plan. The report is brief and succinct, with virtually no site-specific description or commentary regarding the impacts of the proposed development. The tree schedule contains all the site-site-specific details of the trees, including a column labelled 'Proposal' which states whether each tree/group is to be retained or removed in order to facilitate the development.

### Tree quality categorisation

- 3.2. British Standard 5837:2012 recommends that each arboricultural feature is categorised according to its quality and appropriateness for retention within a proposed development. The pertinent issue at this site is whether high-value trees including ancient and veteran trees have been recognised in order to be properly considered within the context of a development proposal.
- 3.3. 20 trees/groups of trees have been assigned the 'A' category; these are trees of high value that are very desirable to retain. Of these, eight are sub-categorised as 'A3'; trees of significant conservation, historical, commemorative or other value (e.g. veteran trees or

wood-pasture). This is an improvement on the previous tree survey submitted which in my opinion failed to recognise the special value of the veteran trees at the site.

- 3.4. It is also positive to see that the linear belt of trees running through the site from approximate north-south which had previously been regarded as of very low value is now classified as 'B3'; trees with material conservation value.
- 3.5. One notable oak tree (ref: 3015) has not been categorised as a veteran or ancient tree. Interestingly, this was the only tree that was previously categorised as a veteran tree in the arboricultural report submitted in 2018. The FLAC report contains an assessment method for recognising ancient, veteran and notable trees called 'RAVEN'. This is a methodology developed by the report's author, Julian Forbes-Laird. Using the methodology put forward in the report, I can see how the tree is to be regarded as 'notable' but not 'veteran' or 'ancient'; although the trunk has a relatively large girth the tree is generally free from extensive decay, hollowing or crown retrenchment.
- 3.6. My observations of the tree are that it is entering late-maturity, whereby the rate of growth slows down as evidenced by the reduction in annual twig extension growth and compact crown form. It certainly has the *potential* to become a veteran tree and is a notable mature specimen.
- 3.7. Identifying veteran trees is not a straightforward or simple exercise when very old trees are in question, and in my opinion there is some inherent subjectivity involved which can include perceptions of age, rarity or special landscape context. Overall, I do not disagree with the findings of the FLAC report in this regard.

#### Application of root protection areas and veteran tree buffers

- 3.8. The major flaw in the previous tree survey and plans were the omission of buffer zones around veteran trees that provide for additional protection from construction activities in the area beyond the root protection area (RPA) which BS5837 recommends is capped at a maximum of 15 metres radially.
- 3.9. The FLAC report and plans include veteran tree buffers (VTBs) around all trees assigned the A3 quality category.

Arboricultural Impacts Assessment (AIA).

- 3.10. The submitted report lacks detail on the anticipated impacts of the development proposal. The assessment of impacts to trees is confined to a column in the tree schedule that states whether the tree is to be retained or removed, as shown on the submitted tree removal and retention plan.
- 3.11. The report does not provide comment on potentially damaging construction activities relevant to the site such as new hard surface construction within RPAs/VTBs, the significance of the required tree losses, alterations in ground levels and the impact of the proposed drainage. Indirect impacts such as the inevitable changes in available groundwater for trees are not discussed. And the impacts of trees on the dwellings, such as shade cast or the requirement for managing old protected trees within gardens is not mentioned.

**4. Review of the development proposal in relation to trees**

- 4.1. The reduced number of dwellings proposed has clearly improved the development proposal from an arboricultural point of view. Trees, including the significant notable and veteran trees, are afforded more open space around them which will undoubtedly reduce the potential for damage and decline.
- 4.2. However, there are several aspects of the proposal which in my opinion are of note due to their negative impact.

Loss of protected tree

- 4.3. The English oak tree T3014 would need to be felled in order to implement the development proposal. This has been categorised as a moderate quality tree (B3) in the FLAC report.

Development within RPAs and VTBs

Oak T3015

- 4.4. Oak tree 3015 has been categorised as an A1 quality tree and has an RPA capped at 15m radius. To the north of the tree, a new road and adjacent footpath is proposed which is



just within this 15m radius. To the south, a footpath to the rear of gardens of plots 49-51 is proposed.

- 4.5. The construction of new hard surfaces are within very small parts of the calculated RPA, but it is worth re-iterating that an RPA is the *minimum* area around a tree required to sustain it. Recent research in to the extent of tree roots of old trees has shown that roots extend well beyond the 'drip line' of the canopy, and beyond the capped 15 metre radius as recommended in BS5837. Using a ground penetrating radar, the roots of a mature oak tree at Burghley Estate were found at 24 metres from the stem<sup>1</sup>. It is therefore anticipated that excavations for the sub-base of these surfaces would result in some root loss.
- 4.6. Furthermore, the construction of hard surfaces with associated drains on the sloping ground above T3015 may alter the local hydrology of the soil, reducing the availability of soil moisture to the tree.

#### Veteran oaks T3031 & 3032

- 4.7. Drainage is proposed to pass through the RPAs of these trees, one of which (3031) is a veteran tree. The tree protection plan notes that a trench-less technique should be used to minimise damage.
- 4.8. This recommendation is sound but will depend on the feasibility of digging the entry and receiver pits outside of RPAs and a substrate free from structures or objects which could deflect the tunnelling device. More detailed specifications are required to properly assess whether this solution is feasible.

#### Veteran oak T3026

- 4.9. The apartment building (plots 6-9) is within the VTB of oak 3026. There appears to be no obvious reason why this building could not be shifted further to the north outside of this zone.

#### Veteran oak T3028

- 4.10. The rear gardens of plots 3 and 4 are within the VTB of this tree. The updated standing advice from Natural England (Nov 2018) regarding buffer zones for veteran trees states that gardens of residential dwellings should not be placed within buffer zones.

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<sup>1</sup> "An examination by TreeRadar: <http://sharonhosegoodassociates.co.uk/wp-content/uploads/2017/01/Burghley-TreeRadar-report.pdf>

#### Veteran oak T3030

- 4.11. The apartment building (plots 66-69) is within the VTB of oak 3030.

#### Veteran oak T3018

- 4.12. Within the VTB, a new footpath and car parking bays are proposed. The tree protection plan specifies a no-dig footpath construction but the car parking bays appear to be of a standard construction. Therefore the semi-natural buffer zone around this high value tree is not maintained.
- 4.13. Although the construction activity within this zone is not particularly intense, some loss of fine roots of the tree may be anticipated.

#### National and Local Planning Policy

- 4.14. Paragraph 118 of the National Planning Policy Framework (NPPF) states that "*planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss*".
- 4.15. In my opinion, the scale and intensity of the proposed development could have a negative impact on some of the aged oak trees that would lead to their premature deterioration. This would be caused by potential for irredeemable damage to occur during construction and the longer and as yet unqualified impacts of the development by changing the soil ecosystem and hydrology.
- 4.16. Section 197 of the Town and Country Planning Act (1990) puts responsibility on LPAs to carefully consider trees when assessing planning applications. It states "*it shall be the duty of the local planning authority to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made by the imposition of conditions for the preservation or planting of trees*". It is therefore incumbent on CBC to ensure that the high value trees on this site are preserved, as well as requiring mitigation tree planting to enhance the tree cover of the site.
- 4.17. CBC's adopted Local Plan (2006) also makes specific reference to the importance of trees in the local landscape, containing two tree-specific policies:



- Policy GE 5: Protection and Replacement of Trees - "the Borough Council will resist the unnecessary felling of trees on private land and will make Tree Preservation Orders in appropriate cases.
- Policy GE 6: Trees and Development - "Development which would cause permanent damage to trees of high value will not be permitted."

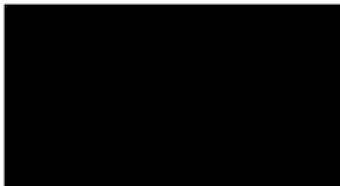
4.18. Core Policy 3 'Sustainable Environment' is also of relevance to considering trees in the context of development. "*Development will be permitted only where it would: ...c) conserve or enhance the best of the built and natural environments; and d) safeguard and promote biodiversity*". Although the majority of the high value trees are proposed to be retained, in my opinion the pressure of the development in the medium to long term would serve to damage the ancient tree population rather than conserve or enhance it.

## 5. Conclusions

- 5.1. My review of the site and the submitted arboricultural report leads me to the following conclusions:
- 5.2. The application site contains numerous trees that are of high value from a conservation and historical point of view. Many are considered to be veterans or notable landscape tree features. As such, a precautionary approach should be adopted when designing any development proposals at the site to in order to ensure that the trees are not negatively impacted. This approach is clearly set out at both the national and local level planning policy.
- 5.3. The arboricultural information submitted with the planning application is succinct and for the most part I agree with the categorisation of tree qualities and recommendations for tree protection as shown on the tree protection plan. However, it lacks a detailed assessment of the the development impacts to trees and conversely from trees to the development in future years.
- 5.4. In my opinion, the development proposal is a considerable improvement on the previous application but still has the potential to cause harm to significant trees.

## 6. Recommendations

- 6.1. I have concluded through my review of the site and the proposed development that there are some opportunities for high value trees at the site to be harmed by the development proposal. Therefore my recommendation is that the LPA refuse the planning application in its current format or request alterations to the layout and more detail about some of the specific tree protection recommendations such as trench-less drain installation.
- 6.2. I recommend that a detailed soil analysis is carried out in order to understand the soil hydrology and how a proposal would impact that and subsequently, the trees.



Paul Barton  
MSc, BSc (hons), MArborA.  
Arboriculturist and Director

## References:

- 1) British Standards Institution (2012). BS5837:2012 'Trees in relation to design, demolition and construction - recommendations'.
- 2) Cheltenham Borough Council (2006). 'Cheltenham Borough Local Plan - Second Review 1991-2011'.
- 3) Department for Communities and Local Government (2012). 'National Planning Policy Framework'
- 4) Forestry Commission & Natural England (2018). 'Guidance: Ancient woodland and veteran trees: protecting them from development". Viewed online at: <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#veteran-trees>.
- 5) Hosegood, S., Lee, I. (2016). An unpublished report of the examination of tree roots of an oak tree at Burghley Estate. Viewed online at: <http://sharonhosegoodassociates.co.uk/wp-content/uploads/2017/01/Burghley-TreeRadar-report.pdf>.

Michelle Payne  
Senior Planning Officer  
Cheltenham Borough Council  
Municipal Offices  
Promenade  
Cheltenham  
GL50 9SA

11<sup>th</sup> January 2019

Dear Michelle

**Land at Oakhurst Rise, Charlton Kings**  
**Outline application for up to 69 dwellings, including access, layout and scale**  
**Reference 18/02171/OUT**

**RESPONSE TO HERITAGE AND CONSERVATION COMMENTS**

We write further to publication of the Heritage and Conservation Response by Chris Morris, Senior Conservation Officer. We have sought the advice of our retained consultant, Dr Carole Fry of AHC Consultants.

The Report has four significant flaws, such it is not an accurate assessment of the current development proposals. Although the Response has arrived late, after those of other consultees, we are responding urgently prior to the publication of the Committee Report.

**1. Reproduction of Earlier Consultation Response**

The Report begins by stating that the proposal has "*not meaningfully changed*". This does not recognise the change in quantum of units (significant reduction by a third), layout, and landscaping of the proposal. The Report does not refer to the updated Heritage Assessment, nor at any point to the new Site Layout Plan.

The Report then states that: "*Much of the previous heritage advice given on refused outline application 17/00710/OUT is reproduced here for reference as the concerns raised are still relevant.*"

It is very concerning that a Report should simply "reproduce" content from an earlier application response, rather than carry out a fresh assessment, by detailed reference to the updated documentation.

## 2. Remaining Setting of St Edward's

The Report accepts that the site did not fall within the parkland but merely represents "*incidental wider rural context*". The Report continues that "*This rural setting is now almost lost due to the existing suburban development so it is considered important to protect what remains of it.*" That is not a correct identification of the setting, which is urban (it is located in the principal urban area), or application of Historic England's Good Practice Advice Note No. 2 on Decision-Taking.

A significant methodological problem is that assessment of viewpoints is taken purely from below the school, as far back as the entrance. This ignores the historic landscaping, the documentary record as to the nature of the land behind the heritage asset and the extensive landscaping that will be provided through the proposal and which would actually reinforce the historic planting which we know we existed here.

There is little to no reference to the extensive construction around the historic asset, notably the kindergarten, school building/library, and extensive sports pitches. It is therefore strongly recommended that the comments are read in the context of the site visit.

## 3. Setting/Significance of Charlton Manor

No reference is made to the extent to which Charlton Manor has been altered by development within its current, much reduced curtilage and the development on adjacent plots to the south which formed part of its original curtilage.

## 4. Public Benefits

The first sentence of the final paragraph of the Response begins by purporting to conduct a planning balance.

The Committee will no doubt be aware that it is inappropriate for a technical consultee to carry this exercise out. This sentence should have been excluded from the overall Response.

## Summary

We have set out in our Application documents, notably the Planning Statement, Heritage Statement, Design and Access Statement, and the various Plans and Site Layouts, the extensive work that has been undertaken to develop a scheme within this location that gives rise to less than substantial harm at the lower end of the scale.

It is our firm view that the Heritage and Conservation Response has reached a judgement that does not take on board this substantial preparatory work. There is therefore ample basis in the evidence before the Council, including the updated ECUS Report, to confirm that the proposal would be acceptable in heritage terms. In any event, the public benefits of the proposal, which are for the planning balance (not the heritage assessment) overwhelmingly weigh in favour of a grant of permission.