AGENDA ITEM NO 1

APPLICATION NO 0683/15

PROPOSAL Partial demolition of existing night club to include rendered building

fronting Ipswich Street and buildings to rear. Conversion of existing 3 storey brick building fronting Ipswich Street and new infill construction and to the rear to provide 25no. new dwellings for affordable rent.

SITE LOCATION Jokers Night Club, 111 Ipswich Street, Stowmarket

SITE AREA (Ha) 0.

APPLICANT Havebury Housing Partnership

RECEIVED February 20, 2015 **EXPIRY DATE** June 8, 2015

REASONS FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

- (1) it is a "Major" application for:-
 - a residential land allocation for 15 or over dwellings
- (2) the Head of Economy considers the application to be of a controversial nature having regard to the location, scale and nature of the application.

PRE-APPLICATION ADVICE

 Officers engaged with the applicant at pre-application stage with regards to the provision of a scheme of 100% affordable units within the conservation area and secondary shopping frontage of Stowmarket.

The applicant engaged in pre-application discussion with Stowmarket Town Council on 1st October and undertook a public consultation exercise for local residents on 25th November, prior to the submission of the application.

During the course of the application the proposal was put to a Design Review Panel (see comments in consultations below).

SITE AND SURROUNDINGS

2. The application consists of the redevelopment of an existing building fronting Ipswich Road, close to the town centre of Stowmarket. The site was formerly Joker's Nightclub but is currently vacant. The site has an area of 0.1 hectares. The site fronts Ipswich Street and the rear boundary abuts Morrison's supermarket.

Existing buildings on the site consist of two adjoining properties including a brick Victorian three storey semi-detached house and a two storey rendered building. The buildings have been extended to the rear and the internal layout substantially altered to facilitate its previous use as a nightclub.

The application site extends behind the adjoining Victorian semi-detached property and abuts the beer garden of the newly constructed Weatherspoon's Pub known as The Willow Tree. To the south-east is a row of two storey, brick, bay fronted, Victorian properties now used as commercial premises including an estate agent. To the rear of these commercial properties is private amenity space. 'The Mix' building is a modern 3 storey building with a site that extends behind adjacent properties to abut the application site.

Ground levels at the site drop approx. 3m in height from the Ipswich Road frontage down to the boundary with the Morrison's car park at the rear.

HISTORY

3. The planning history relevant to the application site is:

1567/08	Rear extension to night club to form additional lounge area and external smoking area. Internal alterations to form extra toilet accommodation.	Granted 17/07/2008	
0451/98/	ERECTION OF SINGLE STOREY REAR EXTENSION.	Granted 28/08/1998	
0026/95/OL	ERECTION OF SINGLE STOREY REAR EXTENSION.	Granted 04/05/1995	
0430/92/	ERECTION OF SINGLE STOREY REAR EXTENSION; ERECTION OF CANOPY AWNING TO NIGHT CLUB ACCESS, REPLACEMENT OF AWNING TO RESTAURANT, EXTERNAL ALTERATIONS TO FRONT ELEVATION OF 111 IPSWICH STREET AND CHANGE OF USE OF 111 TO USES ANCILLARY TO THE NIGHTCLUB/RESTAURANT.	Granted 09/07/1992	
0812/90/	CHANGE OF USE FROM TAXI OFFICE TO	Granted 10/10/1990	

PROPOSAL

4. The application has been subject of amended plans that include revisions to the external appearance of the development.

It is proposed to replace the existing buildings on the site with a new three storey building fronting Ipswich Road and a new three storey block to the rear of the site to provide a total of 25no. flats.

The development would consist of 21no. 1 bed flats and 4no. 2 bed flats, all of which are proposed to be made available for affordable rent.

The development would replace the existing two storey frontage with a three storey building. A separate, three storey block is proposed to be located behind which would extend to the rear boundary. Balcony and courtyard space is provided for properties on the south and east facing elevations.

Undercroft parking would be provided with 25no. spaces. Access would be via a ramped access from Ipswich Street.

POLICY

5. Planning Policy Guidance

See Appendix below.

CONSULTATIONS

6. Stowmarket Town Council

That no objection be raised to the grant of planning consent subject to the following:

- i) That further consideration be given to the proposed Juliet balconies, a design feature which does not respect the character of the surroundings, contrary to planning policy H13; and
- ii) That, in the case of 50% of the dwellings, priority be given to those with a local connection with the arrangement to be established in perpetuity.'

MSDC - Strategic Housing

Summary

No objection

'Generally, the Strategic Housing Team is supportive of this proposal as it will make a significant contribution to affordable housing provision within an area where there is strong demand for the type of accommodation that will be delivered on site, 1 and 2 bedroom accommodation.'

MSDC - Environmental Health - Noise/Odour/Light/Smoke/Emissions

'The assessment identifies three main dominant noise sources that will affect the development as:

- Road traffic along Ipswich Road,
- Mechanical plant associated with ventilation and air conditioning equipment at the Willow Tree Public House and Morrison's' Supermarket
- People noise in the external seating/smoking (beer garden) areas of the Willow Tree Public House.

The report advises that the proposed development will be located in a noisy commercial area of Stowmarket where average external daytime and night time noise levels are likely to exceed the limits, suggested by BS 8233 as being

acceptable for external and internal living spaces.

In particular, dwellings facing the noise from the street, mechanical plant or people in the 'beer garden', will be affected by noise of such an intensity that windows will need to remain shut for some of the time or all of the time during the night in order to achieve a good internal noise standard for habitation, including sleep.

If windows were partially left open it is likely that such noise will have a significant and adverse impact on the internal noise climate of those dwellings, causing disturbance, premature wakening and sleep loss...

'It is likely that some of the future occupiers of the proposed residential premises would need to keep their windows closed for most of the night time period and some of the daytime period...

The [noise] report demonstrates (by calculation) that via the adoption of a higher standard of acoustic glazing and alternative acoustic ventilation, internal noise levels for the proposed dwellings will meet acceptable criteria.

I would advise you that these mitigation measures can be regarded as appropriate if you consider there are significant wider social and economic benefits of the development.'

Historic England

'This application proposes the demolition and replacement of a building in the Stowmarket conservation area and the construction of a large new building to the rear. We consider the demolition would result in harm to the significance of the conservation area, but that an alternative approach could enhance it.'

MSDC - Heritage

'The proposal would not cause substantial harm or loss of significance to the Stowmarket Conservation Area. The development therefore gives rise to less than substantial harm within the meaning provided by the NPPF but it would still be harmful to the Stowmarket Conservation Area. That harm should be weighed against the public benefits that might arise as a result of the proposal. There are, however, other planning considerations that should be taken into account.'

Suffolk Preservation Society

'The amended design of the rear block has been substantially improved by the removal of the pseudo-mansard and increase in height of the bays to the roof level on the south elevation, giving a stronger form and more cohesive design.

However, we continue to have serious reservations regarding the Ipswich Road frontage. Whilst the simplification of the elevational treatment is welcomed the height of the three storey block is still considered to be too high and should be reduced by one storey.'

The Stowmarket Society

'Having considered the new drawings, we continue to hold our objections to the design of the scheme. The revised frontage building to Ipswich Street sits very uncomfortably with the abutting three-storey semi-detached pair particularly in the clumsy relationship between the false hipped roof of the new-build against the end wall of the retained building. We also feel that the design of the new infill seems to be a poor attempt at a faux nineteenth century façade compromised by the use of modern fenestration forms and a lack of articulated detailing. The scheme fails by not opting for either a modern architectural approach or a more shameless neo-Victorian. Although the original scheme was very seriously flawed we do feel that its modern architectural approach could have been successful if developed further, and the problems of scale in the street scene properly addressed.

The main body of the new building is certainly no better that the original and gives every impression of being a supreme effort to cram as much accommodation as possible onto the site — and never mind the quality of appearance or the quality of life for residents.'

Suffolk Design Review Panel

'In an effort to make the project financially viable, it would appear that the development has become too big for the site. The conservation area policy requires that a building of size needs to be a building of note. This proposal would have a significant and currently unsatisfactory impact on the area to the rear, so either the proposal should be diminished in size, or it should be improved in design quality to offer a positive contribution. The applicants were encouraged to represent the scheme to the panel after reconsideration.'

Suffolk County Council - Highways

The parking provision is below the level required by technical guidance but it is considered that the development is in a town centre location within walking and cycling distance of local facilities, and there is a public car park available directly opposite, so it is not anticipated to result in additional parking on the highway.

No objections subject to conditions and measures to ensure no parking on the pavement and removal of a refuse bin to improve visibility.

MSDC - Economic Strategy

The southern end of Ipswich Street is a focus for the night time economy with the Regal Theatre and several pubs, takeaways and restaurants. The Willow Tree is adjacent to this site. It is a successful pub/restaurant that has open space at the back for outdoor tables and a smoking area. This does create some noise late into the evening, which might need some mitigation by the units at the rear.

Ideally, the ground floor of the former Jokers Nightclub should be re-developed for A1, A3 or A4 uses to support the vitality of the town centre and offer opportunities for local business development.'

6

MSDC - Strong Communities

'The contribution for 21 x 1 bedroom dwellings (42 persons) and 4 x 2 bedroom dwellings (12 persons) (total number of persons = 54) in accordance with the Council's adopted Supplementary Planning Document for Social Infrastructure including Open Space, Sport and Recreation is £99,090.00 This broken down as follows:

Play Areas	£17226
Outdoor Pitches (Football,	
Cricket, Rugby, Hockey)	£37638
Informal recreation space	£5508
Village Halls and Community	
Centre	£15336
Swimming pools	£5184
Sports Halls	£9720
Outdoor other sports pitches (including tennis, bowls, netball	
and FMGA)	£7290
STP	£1188
Total	£99090

SCC - Corporate S106

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£974.48	£24,362
Transport	£360	£9,000
Libraries	£216	£5,400
Waste	£51	£1,275
Total	£1601.18	£40,037

MSDC Viability Officer

The development could provide contributions towards the provision of SCC Infrastructure and, subject to review to assess final build cost, may also be able to provide contributions towards the provision of open space and social infrastructure.

Suffolk County Council - Archaeology

No objection subject to conditions

MSDC - Environmental Health - Land Contamination

No objection subject to condition securing further contamination surveys.

Anglian Water

No objection subject to conditions

Natural England

Natural England has no comments to make regarding this application subject to standing advice.

Fire Service HQ - County Fire Officer

No objections subject to standard advice.

MSDC - Tree Officer

There are no arboricultural implications relating to this proposal.

LOCAL AND THIRD PARTY REPRESENTATIONS

7. This is a summary of the representations received.

No local or third party representations have been received

ASSESSMENT

- 8. The application is considered in relation to the following key issues:
 - Principle of development
 - Affordable housing
 - Design and layout
 - · Residential amenity/noise
 - Heritage
 - Economic development
 - Parking
 - Financial contributions

PRINCIPLE OF DEVELOPMENT

The Council acknowledges that it is unable to demonstrate a five-year supply of deliverable housing land, as required by paragraph 47 of the Framework. Accordingly, in accordance with paragraph 49 of the Framework, the proposal should be considered in the context of the presumption in favour of sustainable development. For the purposes of decision taking, that means granting planning permission unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework, taken as a whole.

The proposed development is within the town centre of Stowmarket and is therefore considered to be a sustainable location, in keeping with the requirements of the NPPF, Core Strategy Focussed Review FC1 and FC1.1.

The provision of affordable housing is supported by the NPPF and Altered Local Plan Policy H4. MSDC Strategic Housing has expressed a need for 1 and 2 bed affordable units in the Stowmarket. As such the provision of a 100% affordable housing scheme in a sustainable location is supported.



The site is within a secondary shopping frontage and therefore SAAP Policy 5.2 – Principal Shopping Area (Primary and Secondary Shopping Frontages) applies. This requires that only A1 – A5 uses and appropriate D1 uses will be considered for ground floor use. Whilst the importance of the secondary frontage to the wider vitality of the town centre is taken into account, this is weighed in the balance against the need for affordable housing.

The NPPF requires that development conserves and enhances the historic environment. Core Strategy CS5 requires that new development has regard to its context and be of 'high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk'. The development involves the replacement of the existing buildings which are within the conservation area. Any development would be required to have regard to its impact on the appearance of the conservation area, particularly in views along Ipswich Street and views into the conservation area from Gipping Way which is to the rear of the site.

Local Plan Policy H17 requires that where new development would be exposed to excessive noise levels from nearby premises it should be refused. The site would be located within the town centre of Stowmarket. To the rear of the site is Morrison's supermarket, to the east is The Mix, to the west is The Willow Tree Public House. Any permission is required to have regard to potential impact on residential amenity of noise from nearby properties and to ensure that new development does not compromise existing uses.

The NPPF paragraphs 56 – 58 requires that new development is of a good design 'making places better for people'. The proposed development is of a high density and is required to ensure that living conditions are of an appropriate standard with reasonable access to daylight and living space. The design and layout needs to be suitable for the lifetime of the development.

The principle of redevelopment of the site to provide affordable housing in a sustainable location is supported. However, the granting of permission is subject to the proposed development demonstrating that dwellings will not be subject to excessive noise from surrounding uses around the site, that it conserves or enhances the appearance of the conservation area and that it provides good quality accommodation for the lifetime of the development. To this extent the development proposal is not sustainable within the sense of the NPPF.

AFFORDABLE HOUSING

The NPPF supports the provision of a range of house types to meet local needs. Core Strategy CS9 sets out that new housing should provide a mix of house types, sizes and affordability. It recommends a density of at least 30 dwellings per hectare, unless there are special local circumstances that require different treatment. Altered Local Plan Policy H4 and Local Plan Policy H14 support the provision of affordable housing.

The application proposes to provide 25no. 1 and 2 bed units, all of which would be made available for affordable rent. MSDC Strategic Housing support the application as there is strong demand in Stowmarket for the type of accommodation proposed.

The site is in a sustainable location where any occupants would have good access to a wide range of services and facilities as well as good access to public transport links. The application seeks to maximise use of the land in order to



make a viable development. The provision of new affordable units in sustainable location where there is a strong demand for the proposed house types is supported.

DESIGN AND LAYOUT

The application has been the subject of design conversation from pre-app stage onward and heritage advice has been sought to inform the design. As can be seen the site is in a prominent town centre location and there are a number of design issues including the conservation area, compatibility with adjacent uses and highway standards which must be carefully balanced.

The plans as originally submitted were presented to the Suffolk Design Review Panel given concerns that came into discussion whilst the application was under consideration. The outcome of this is summarised above (full comments available in the agenda). In summary, concerns were raised that the proposed development was too big for the site and failed to have a positive impact on the appearance of the conservation area, as is required by Core Strategy CS5. Amended plans have been submitted that attempt to address concerns regarding the Ipswich Street frontage and includes minor alterations to the external appearance of the block to the rear. However, the bulk and mass of the block to the rear of the site remains.

The Suffolk Design Review Panel noted that in order to address its location, potential development of the site should either be reduced in size so that it is not overly prominent in views into the conservation area or to propose a building with high quality design that is a building of note in its own right and therefore adds to the appearance of the area.

Comment has been received from Historic England that raises concern with regard to the appearance of the frontage which they considered to be an undesignated heritage asset and the impact that it would have on the appearance of the conservation area. Their objections are maintained in relation to the amended plans.

Stowmarket Preservation Society and Suffolk Preservation Society have objected to the application based on the height and roof design of the Ipswich Street frontage. Objections are maintained despite amended plans.

It is appreciated that a high density scheme is required to make a 100% affordable housing development economically viable. Weighing the balance of merits in this case, the appearance of the development is considered to detract from the appearance of the wider conservation area and not appropriately address the need for compatibility with adjacent users. Notwithstanding the public benefits of affordable homes in this location, this is contrary to the requirements of the NPPF, Core Strategy CS5, Local Plan Policy HB8 and Stowmarket Area Action Plan Policy 4.2.

RESIDENTIAL AMENITY/NOISE

Local Plan Policy H17 requires that proposed development will not be supported where it would be exposed to excessive noise from existing premises. The NPPF and relevant Planning Practice Guidance (PPG) recommend that planning permission should not be granted where the perception of noise is noticeable, disruptive and such that it has a significant adverse impact. Consideration should take into account potential mitigation and the balance of wider social and

economic issues.

The adjacent Willow Tree public house is a modern redevelopment that has proven to be a popular addition to the town's night time economy. The creation of new residential development in the area should not be subject to excessive noise and any new development should not compromise the on-going viability of an existing town centre use.

A degree of noise is expected for a town centre location. However, the noise levels from the adjacent beer garden set out in the submitted noise assessment are of particular concern. The pub is licensed to 00:30 Monday to Thursday, 01:30 on Friday and Saturday nights and occasional opening to 02:30. The type of noise, including irregular people noise, has significant potential to harm residential amenity at unsociable hours.

Based on the submitted noise assessment MSDC Environmental Health accept that whilst noise levels would be high and potentially disturbing, noise levels within the flats could be mitigated to an acceptable level by design and acoustic mitigation measures. This is based on windows on the western elevation remaining closed and habitable rooms, such as bedrooms and living rooms, having an outlook directed away from the noise source.

The proposed layout positions habitable rooms facing southwards to avoid main noise sources. This allows openable windows to be on the southern elevation and reduce internal noise levels to an acceptable level. However, this results in primary windows serving flats no. 2, 3, 12, 13, 24 and 25 having an inward facing outlook with limited natural light. This is particularly limiting for ground floor flats no. 2 and 3 which would have north facing windows below the ground level of the adjacent Willow Tree pub and south facing windows that face onto a pedestrian access for the development. This is considered to result in a poor quality internal living space that would not meet the requirement of the NPPF to 'make places better for people'.

Although it is possible to limit the impact of noise to occupants, the required measures would result in poor living conditions for future occupants. This is considered to be contrary to the requirements of the NPPF and Local Plan H17. Taking into account comments from Suffolk Design Review Panel, it is considered that an alternative design and layout could result in improved residential amenity for future occupants.

HERITAGE

The development would replace the existing two storey building with a three storey building. A Heritage Assessment has been submitted with the application to address the historic importance of the building. NPPF paragraph 135 requires that regard be given to the scale of any harm or loss and the significance of the historic asset. Core Strategy Policy CS5 requires that any new development protects and conserves the character and appearance of the site.

MSDC Heritage have considered the application and consider that the existing building is of limited historic importance and its replacement gives rise to less than substantial harm within the meaning provided by the NPPF but it would still be harmful to the Stowmarket Conservation Area. That harm should be weighed against the public benefits that might arise as a result of the proposal.

ECONOMIC DEVELOPMENT

The site is within the town centre area defined within the SAAP as an area for redevelopment. SAAP Policy 5.1 – General Retail Policies for all of the Stowmarket Area Action Plan provides that new development in the town centre shall improve the vitality and viability of the town centre, increase the number of shops and seek to refurbish/redevelop Ipswich Street. New residential development will not be encouraged in the town centre where it could compromise any future retail development.

The site is on a secondary shopping frontage where SAAP Policy 5.2 – Principal Shopping Area applies. Within the secondary shopping frontages only A1 – A5 uses and appropriate D1 uses will be considered for ground floor use. The permanent loss of A1 retail use within the Secondary Shopping Frontages will be resisted but it should be noted that the existing use of the site is Sui Generis (nightclub).

The application proposes to replace the Sui Generis use with 100% residential development. MSDC Economic Development encourage the inclusion of an element of retail space at ground floor level to add to the vitality and long term viability of the town centre.

The inclusion of an element of retail space has been considered. However, given the limitations on viability of providing 100% affordable housing and the requirements for pedestrian and vehicular access, the provision of a viable retail unit within the ground floor frontage is not feasible.

The lack of contribution to retail space within an area of town centre redevelopment is weighed in the balance against the economic and social benefits of providing affordable housing.

PARKING

The development proposes 1 parking space per dwelling in an undercroft parking area accessed from Ipswich Street via a gated access ramp. Taking into account the location of the site and good access to public transport, the access and parking spaces are acceptable to Suffolk County Council Highways, subject to conditions relating to provision of a suitable visibility splay and measures to avoid parking on the pavement. These arrangements do however have a cost consequence for the scheme.

FINANCIAL CONTRIBUTION

The development is proposed to provide 100% affordable units. Due to the reduced return from affordable rental properties the potential contribution towards infrastructure costs such as education and open space is limited.

Consultation responses set out that the standard contributions would total the following:

- Open space and social infrastructure £90,090
- SCC Infrastructure £40,037

The applicant has engaged with the council in a viability assessment. The result is that the Viability Consultant considers that contributions towards the provision of SCC infrastructure can be provided without compromising the viability of the development. There may also be additional surplus, subject to final tendering

costs for the construction of the basement, that could be secured for contribution towards the provision of open space and social infrastructure. It is recommended that this is reviewed via a 'claw back' clause prior to commencement if planning permission is granted.

CONCLUSION

The proposed development would provide brownfield residential redevelopment in a sustainable location and provide a notable number of affordable dwellings for which there is strong demand in Stowmarket. However, the design and layout of the development fails to conserve or enhance the character and appearance of the conservation area, including views into the conservation area from the east. The development would be subject to high noise levels from surrounding uses and the mitigation required to attenuate this would result in limited residential amenity for future occupants. Based on the above it is considered that the proposed development does not comply with the requirements of the NPPF, Core Strategy and Local Plan and it is therefore recommended for refusal for the reasons set out below.

RECOMMENDATION

That Full Planning Permission be refused for the following reasons:

- 1. The proposed development fails to conserve or enhance the character and appearance of the Conservation Area by virtue of poorly detailed elevations that fail to take into account the local vernacular. The scale and design of the development is moreover considered to result in a form of development that detracts from the wider appearance of the conservation area, including views from Gipping Way. The proposed development is therefore considered to be contrary to the requirements of The NPPF, notably paragraph 54 56 and 131 137, Core Strategy Policy CS5, Local Plan Policies GP1, HB8 and H13.
- 2. The proposed design and layout would result in poor residential amenity for occupants, in particular flats no. 2, 3, 12, 13, 24 and 25 by reason of the measures necessary to mitigate against significant adverse impact of noise from surrounding uses. Failure to provide a good level of residential amenity is contrary to the NPPF, notably Section 7 paragraph 54-56, Local Plan Policy GP1, H13
- 3. The proposed development fails to secure appropriate contribution towards the provision of local infrastructure.

Philip Isbell Corporate Manager - Development Management Mark Pickrell Senior Planning Officer

APPENDIX A - PLANNING POLICIES

1. Mid Suffolk Core Strategy Development Plan Document and the Core Strategy Focused Review

Cor12 - CS12 RETAIL PROVISION

Cor1 - CS1 Settlement Hierarchy

Cor5 - CS5 Mid Suffolks Environment

Cor7 - CS7 Brown Field Target

Cor8 - CS8 Provision and Distribution of Housing

Cor9 - CS9 Density and Mix

CS SAAP - Stowmarket Area Action Plan

CSFR-FC1 - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

CSFR-FC1.1 - MID SUFFOLK APPROACH TO DELIVERING SUSTAINABLE

DEVELOPMENT

Cor6 - CS6 Services and Infrastructure

2. Mid Suffolk Local Plan

HB9 - CONTROLLING DEMOLITION IN CONSERVATION AREAS

H17 - KEEPING RESIDENTIAL DEVELOPMENT AWAY FROM POLLUTION

HB8 - SAFEGUARDING THE CHARACTER OF CONSERVATION AREAS

HB1 - PROTECTION OF HISTORIC BUILDINGS

GP1 - DESIGN AND LAYOUT OF DEVELOPMENT

HB13 - PROTECTING ANCIENT MONUMENTS

H13 - DESIGN AND LAYOUT OF HOUSING DEVELOPMENT

H14 - A RANGE OF HOUSE TYPES TO MEET DIFFERENT ACCOMMODATION NEEDS

H15 - DEVELOPMENT TO REFLECT LOCAL CHARACTERISTICS

H16 - PROTECTING EXISTING RESIDENTIAL AMENITY

H17 - KEEPING RESIDENTIAL DEVELOPMENT AWAY FROM POLLUTION

H2 - HOUSING DEVELOPMENT IN TOWNS

H4 - PROPORTION OF AFFORDABLE HOUSING IN NEW HOUSING

DEVELOPMENT

HB2 - DEMOLITION OF LISTED BUILDINGS

3. Planning Policy Statements, Circulars & Other policy

NPPF - National Planning Policy Framework

C01/03 - Safeguarding aerodromes, technical sites and military explos

APPENDIX B - NEIGHBOUR REPRESENTATIONS

No Letters of representation have been received.