



ROACH
PLANNING

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING REPORT **SEPTEMBER 2023**

PROPOSED HIGHWAYS WORKS AND RESIDENTIAL DEVELOPMENT **SOUTHGATE, EXETER**

PROJECT	Highways Works and Residential Development Southgate, Exeter
CLIENT	Exeter City Council
REPORT	Environmental Impact Assessment (EIA) Screening Report
REFERENCE	0256-02
REVISION	0
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Roach Planning and Environment Limited
12a The Triangle | Teignmouth | Devon | TQ14 8AT
ian@roachplanning.co.uk
07779 008560

Registered in England and Wales, Registration Number 10804443

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1. INTRODUCTION

- 1.1 Roach Planning is engaged by Exeter City Council (in its capacity as developer) to provide planning consultancy services in relation to the proposed highways works and residential development at Southgate, Exeter.
- 1.2 This document comprises an Environmental Impact Assessment (EIA) Screening Report. It presents our analysis of whether or not the proposed development should require EIA in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI No 571). It is submitted to Exeter City Council (in its capacity as Local Planning Authority) along with a request for an EIA Screening Opinion under Regulation 6.
- 1.3 This EIA Screening Report has been authored by Roach Planning on behalf of the applicant. Roach Planning's Director, Ian Roach, is a Full Member of the Institute of Environmental Management and Assessment, a Registered EIA Practitioner, a Chartered Environmentalist and a Chartered Town Planner, with over twenty years' experience in EIA and planning. This EIA Screening Report has therefore been prepared by a "competent expert" in the context of Regulation 18(5).

2. SITE LOCATION AND PROPOSED DEVELOPMENT

- 2.1 The site's location, 'Southgate', stems from nearby south gate to the historic walled city of Exeter. Certain physical remnants of the city's past are still visible, but today the Southgate site is dominated by a highway gyratory connecting Magdalen Street, Southernhay East, Western Way, South Street and Holloway Street, at the centre of which is the Magdalen Street surface car park. At the eastern end of the car park, within the site, is a building which is currently used as a night shelter for homeless people. There are also some trees and incidental areas of green space within the site. The application site location is illustrated in Figure 2.1, on which the planning application site boundary is outlined by a solid red line (measuring approximately 1.5 hectares), and the area within which residential development is proposed (measuring approximately 0.7 hectares) is outlined by a dashed red line. For brevity we refer in this report to 'the site' as meaning the area within the solid red line.
- 2.2 The site forms part of proposed allocation 'South Gate', site reference 46, under Policy H2 of the emerging Exeter Local Plan 2020-2040, Outline Draft version, September 2022. Refer to Figure 2.2. The draft allocation is for mixed use including 170 dwellings. The draft allocation includes further land and buildings to the west, although these do not fall within the site boundary.
- 2.3 Exeter City Council is proposing to submit in February 2024 a hybrid planning application for highways works and residential development – the highways works being subject to the full/detailed element of the planning application and the residential development being subject to the outline element of the application.

- 2.4 The applicant currently envisages residential development of approximately 172 dwellings, but for the purposes of this EIA Screening Report we assume up to 200 dwellings to provide some tolerance as the design emerges. Tall buildings are envisaged in order to achieve the anticipated number of dwellings within the confines of the site.
- 2.5 Nearby land uses potentially sensitive to new development include residential accommodation, offices and hotels.
- 2.6 The 'Exeter City Walls' Scheduled Monument crosses the site at its western extent. Refer to Figures 2.2 and 2.3. The Scheduled Monument is classified as a 'sensitive area' under EIA Regulations. The absence of any other 'sensitive areas' is shown on Figure 2.3.
- 2.7 The site is located within two Conservation Areas (CA): Central CA and Southernhay & Friars CA, although is almost entirely within the latter. Refer to Figures 2.2 and 2.4. The trees within the site are not designated by any Tree Preservation Orders, although the trees are afforded certain protection due to their location within CA.
- 2.8 There are no Listed Buildings within the site itself, although several Grade II Listed Buildings are situated in the immediate vicinity. Refer to Figure 2.2.
- 2.9 Almost the entire site is located within an Area of Archaeological Importance as designated in the Exeter Local Plan First Review 1995-2011, Adopted 31 March 2005.
- 2.10 The site is located within the Exeter Air Quality Management Area (AQMA). Refer to Figure 2.5.

- 2.11 The site is located within the 10km Exe Estuary Special Protection Area (SPA) buffer, being approximately 3.2km from the SPA itself at its closest point.
- 2.12 The site is located entirely within Flood Zone 1, i.e. the lowest risk of flooding from rivers or the sea.

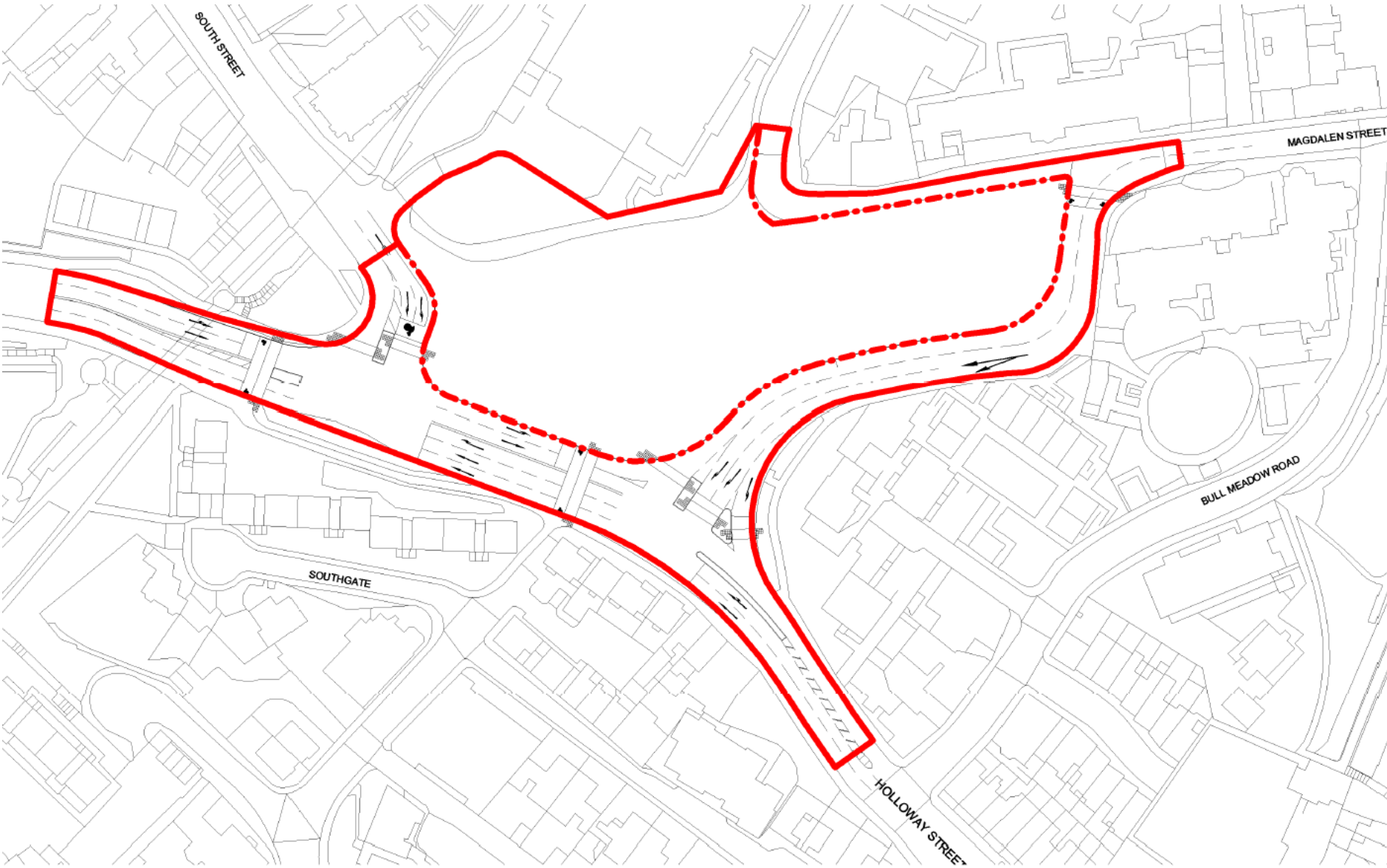


FIGURE 2.1: SITE LOCATION

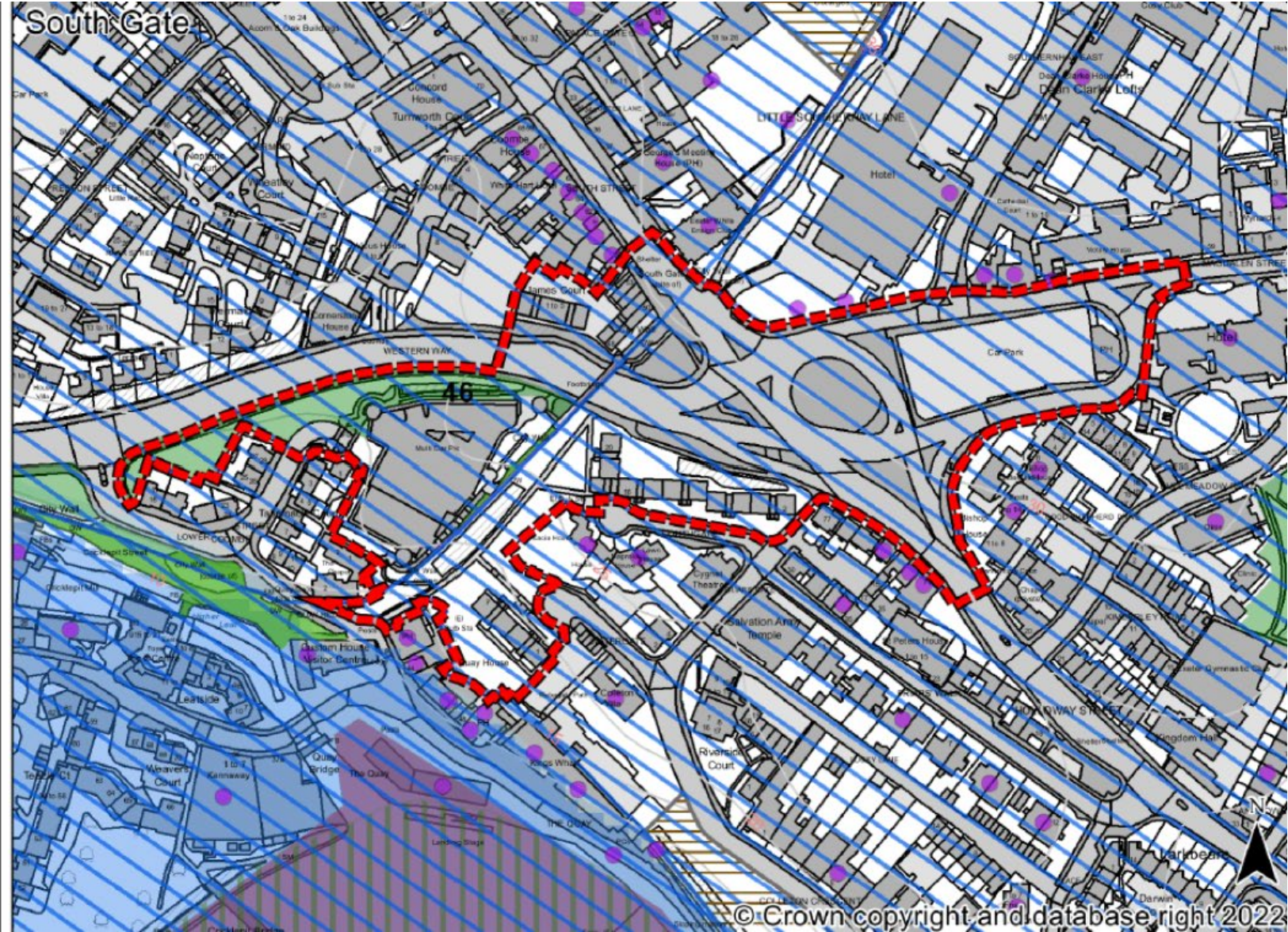


FIGURE 2.2: PROPOSED SITE ALLOCATION 46 'SOUTH GATE' IN THE EMERGING EXETER LOCAL PLAN 2020-2040 (SOURCE: EXETER CITY COUNCIL)

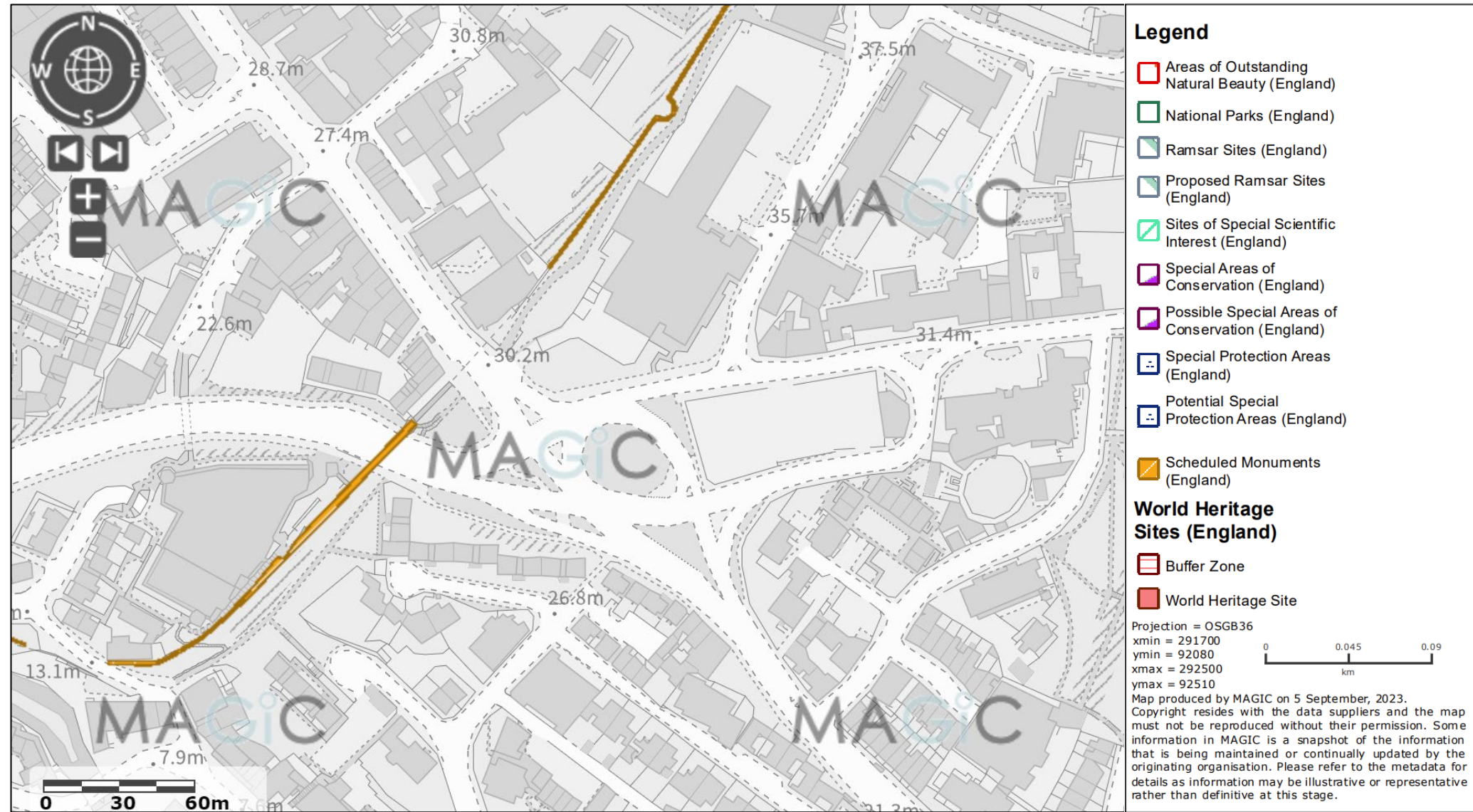


FIGURE 2.3: EIA REGULATIONS 'SENSITIVE AREAS' MAP (SOURCE: MULTI-AGENCY GEOGRAPHIC INFORMATION FOR THE COUNTRYSIDE)



FIGURE 2.4: LOCATIONS OF CENTRAL AND SOUTHERNHAY & FRIARS CONSERVATION AREAS (SOURCE: EXETER CITY COUNCIL)



FIGURE 2.5: EXTENT OF EXETER AQMA IN THE VICINITY OF THE SITE (SOURCE: UK AIR INFORMATION RESOURCE)

3. EIA SCREENING

3.1 The flowchart at Figure 3.1, opposite, illustrates the sequential questions considered in the EIA Screening process and is reproduced from the Government's Planning Practice Guidance. These questions are now addressed sequentially in this report.

Is the development of a type described in Schedule 1 of the 2017 Regulations?

3.2 No.

3.3 The proposed development is not of a type described in Schedule 1.

Is the development described in column one of Schedule 2 of the 2017 Regulations?

3.4 Yes.

3.5 The proposed development falls under Schedule 2, Part 10 'infrastructure projects', Clause (b) 'urban development projects...'

3.6 We do not consider that the proposed development falls under Schedule 2, Part 10 'infrastructure projects', Clause (f) 'construction of roads', because the roads at the site are already present and the proposed works will only comprise amendments to the existing vehicle, cycle and pedestrian infrastructure.

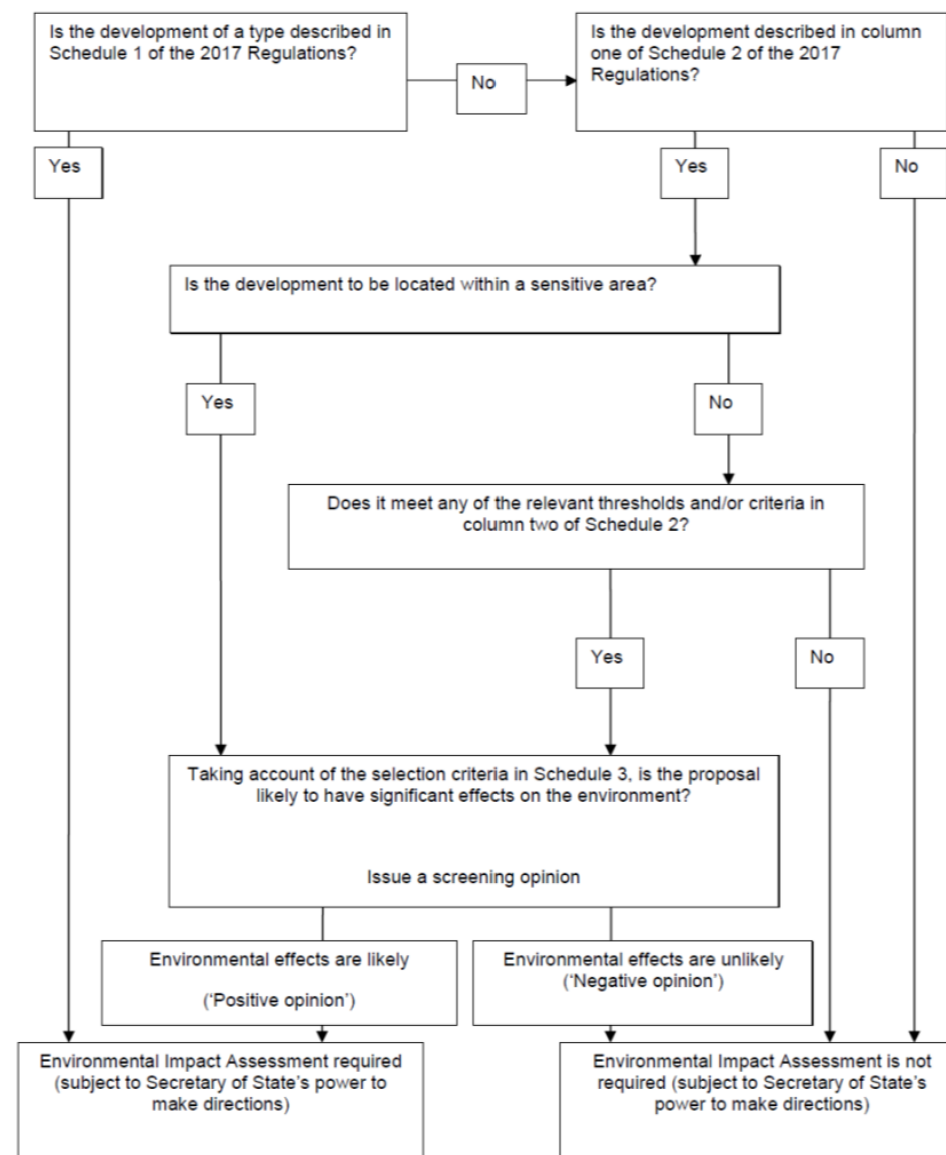


FIGURE 3.1: EIA SCREENING FLOWCHART

Is the development to be located within a sensitive area?

3.7 Yes.

3.8 The site boundary incorporates a short section of the city wall, located to the west of the site, which is a Scheduled Monument. Scheduled Monuments are classified as 'sensitive areas' for the purposes of EIA Screening.

Taking account of the selection criteria in Schedule 3, is the proposal likely to have significant effects on the environment?

3.9 This is addressed in Table 3.1, wherein the Schedule 3 selection criteria are reproduced in the first column and Roach Planning's analysis is provided in the second column. However, before considering each criterion in turn, it is relevant to consider certain Government guidance.

Indicative Thresholds and Criteria

3.10 The Government's Planning Practice Guidance (Paragraph: 018 Reference ID: 4-018-20170728) indicates that:

"Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment. It is also possible to provide an indication of the sort of development for which an assessment is unlikely to be necessary. To aid local planning authorities to determine whether a project is likely to

have significant environmental effects, a set of indicative thresholds and criteria have been produced. See the indicative thresholds and criteria. The table also gives an indication of the types of impact that are most likely to be significant for particular types of development.

However, it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."

3.11 The indicative thresholds or criteria are found at Planning Practice Guidance Paragraph: 058 (Reference ID: 4-058-20150326). The indicative thresholds and criteria for Schedule 2, Part 10(b) are:

"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)."

3.12 On sensitive areas, such as Scheduled Monuments, Planning Practice Guidance (Paragraph: 032; Reference ID: 4-032-20170728) states:

“An Environmental Impact Assessment is more likely to be required if the project affects the features for which the sensitive area was designated. However, it does not follow that every Schedule 2 development in (or affecting) these areas will automatically require an Environmental Impact Assessment. It will be necessary to judge whether the likely effects on the environment of that particular development will be significant in that particular location.”

- 3.13 The aforementioned guidance is now considered in terms of our analysis of the Schedule 3 criteria.

TABLE 3.1: ANALYSIS OF SCHEDULE 3 CRITERIA

Sch 3 Selection Criteria	Roach Planning Analysis
<u>Characteristics of development</u>	
1. The characteristics of development must be considered with particular regard to–	
(a) the size and design of the whole development;	<p>The site is brownfield, has been intensively developed, mainly as highways and car parking, and is therefore already very urbanised.</p> <p>The residential component of the proposed development is clearly a different use and on a greater scale than the existing use.</p> <p>However, the application site area is only approximately 1.5 hectares in area in total (of which only approximately 0.7 hectares would comprise residential development), which falls some way below the indicative 5 hectare threshold set out in Planning Practice Guidance. Furthermore, the proposed development comprises up to 200 dwellings, which falls some way below the 1,000 dwellings threshold in the Guidance. Those indicative thresholds are for sites which have not been previously intensively developed, which are usually more sensitive.</p> <p><u>We conclude that no significant effects on the environment are envisaged by virtue of size and design of the whole development.</u></p>
(b) cumulation with other existing	The site occupies a city centre location. The site itself is brownfield and is provisionally allocated in the emerging Local Plan for

Sch 3 Selection Criteria	Roach Planning Analysis
development and / or approved development;	<p>redevelopment of this nature and scale. Other such planned developments are proposed elsewhere in the city.</p> <p>The proposed development (and development at other sites) is supported by the Exeter Density Study July 2021, which recommends increasing the density of development in the city centre, with a minimum density of 150 dwellings per hectare in this location.</p> <p><u>No significant effects on the environment are envisaged by virtue of cumulation with other development.</u></p>
(c) the use of natural resources, in particular land, soil, water and biodiversity;	<p>The proposed development would not result in the loss of agricultural land. No significant effects on soil or water are expected, although there will be an increased demand for potable water.</p> <p>There is a major opportunity to enhance the site and enable biodiversity net gain as part of the proposed development.</p> <p><u>No significant effects on the environment envisaged by virtue of use of natural resources.</u></p>

Sch 3 Selection Criteria	Roach Planning Analysis
(d) the production of waste;	<p>The development would be added to the regular recycling and residual waste collection services for Exeter. Waste generation by each dwelling would be similar to that of average Exeter households, probably less than average given the likely residential mix comprising 1-bedroom and 2-bedroom apartments.</p> <p><u>No significant effects on the environment envisaged by virtue of the production of waste.</u></p>
(e) pollution and nuisances;	<p>The site is within an AQMA. However the proposed development is expected to maintain a similar flow of vehicular traffic to that at present, around/through the site, through works to existing highways. It will reduce car parking provision in the city centre.</p> <p>There is also a national trend towards cleaner petrol and diesel engines, which themselves are expected to be gradually phased out, with there being more and more electric vehicles on the roads. As a result, there is a general trend towards improved local air quality.</p> <p>The proposed development includes up to 200 dwellings, however is proposed to be essentially car-free, meaning no car parking will be provided on-site, with the exception of a handful of spaces for car clubs, delivery vehicles and spaces for disabled persons.</p>

Sch 3 Selection Criteria	Roach Planning Analysis
	<p>Proposed improvements to pedestrian and cycle links will further encourage active travel / reduce car usage for short trips.</p> <p>Noise produced by traffic would be mitigated through glazing, ventilation and façade specification.</p> <p><u>No significant effects on the environment envisaged by virtue of pollution / nuisances.</u></p>
(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;	<p>No major accidents / disasters are foreseen.</p> <p>No part of the site within Flood Zone 2 / 3.</p> <p><u>No significant effects on the environment envisaged by virtue of risk of major accidents / disasters.</u></p>
(g) the risks to human health (for example, due to water contamination or air pollution).	<p>As discussed above, no significant air quality or noise effects are anticipated.</p> <p>Significant land contamination is not expected to be present. If any contaminated land is discovered, it be remediated or removed from site so as to not pose a risk to human health.</p> <p>The proposed development itself is not expected to cause any land or water contamination.</p> <p><u>No significant human health risks envisaged.</u></p>

Sch 3 Selection Criteria	Roach Planning Analysis
<u>Location of development</u>	
2.-(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to–	
(a) the existing and approved land use;	<p>Land take would be as described above. The site is previously developed. The principle of redevelopment of the site is supported by draft Policy H2 of the emerging Local Plan.</p> <p><u>No significant effects on the environment envisaged by virtue of the existing and proposed land use.</u></p>
(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;	<p>The site, being previously developed, has limited surface-level natural resources, i.e. soil, land and biodiversity. These are fairly abundant and available across the Exeter area.</p> <p>The site contains trees and vegetation likely to be of some local arboricultural and/or ecological interest, subject to survey. The proposed development would necessarily require the removal of some trees and vegetation.</p> <p>However, the development will have to not only mitigate loss through new planting but provide 10% Biodiversity Net Gain in accordance with national requirements.</p> <p><u>No significant effects on the environment envisaged by virtue of natural resource use.</u></p>

Sch 3 Selection Criteria	Roach Planning Analysis
(c) the absorption capacity of the natural environment, paying particular attention to the following areas–	-
(i) wetlands, riparian areas, river mouths;	<p>None of the stated features are located within the site area.</p> <p>The site is within the 10km Exe Estuary SPA buffer zone, potentially adding some recreational pressure to the SPA, but impacts would not be expected to be significant, and if necessary could be mitigated.</p> <p><u>No significant effects on the environment envisaged in relation to wetlands, riparian areas or river mouths.</u></p>
(ii) coastal zones and the marine environment;	<u>As above.</u>
(iii) mountain and forest areas;	<u>Not applicable.</u>
(iv) nature reserves and parks;	<u>Not applicable.</u>
(v) European sites and other areas classified or protected under national legislation;	<p>There are no European sites or other protected areas within the site.</p> <p>The site is within the 10km Exe Estuary SPA buffer zone, potentially adding some</p>

Sch 3 Selection Criteria	Roach Planning Analysis
	<p>recreational pressure to the SPA, but impacts would not be expected to be significant, and if necessary could be mitigated.</p> <p><u>No significant effects envisaged on European sites other areas classified or protected under national legislation.</u></p>
(vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;	<p>The site is within an AQMA. See discussion under 1(e) above.</p> <p><u>No significant effects on the environment envisaged by virtue of failure of environmental quality standards.</u></p>
(vii) densely populated areas;	<p>The site is brownfield, has been intensively developed, mainly as highways and car parking, and is therefore already very urbanised.</p> <p>The residential component of the proposed development is clearly a different use and on a greater scale than the existing use, but such a change in use and redevelopment of the site is foreseen in emerging and evidenced planning policy for this location.</p> <p><u>No significant effects on the environment envisaged in relation to densely populated areas.</u></p>

Sch 3 Selection Criteria	Roach Planning Analysis
(viii) landscapes and sites of historical, cultural or archaeological significance.	<p>Exeter City Walls collectively comprise a Scheduled Monument, one section of which is located within the site boundary at the western end of the site. There are two sections of the historic walls, one either side of Western Way, used as abutments for a modern footbridge spanning Western Way. The proposed development does not require or comprise any works to the historic city walls or the footbridge.</p> <p>There are no listed buildings within the site, although several Grade II Listed Buildings are located in its vicinity, mixed in with other buildings that do not have historic or architectural importance. No Listed Building will be physically impacted by the proposed development, but there will inevitably be a change to the setting of the Listed Buildings, however the extent of the change can be minimised through sensitive site layout, massing and materials choices.</p> <p>The site is located within two separate but adjacent CA; predominantly the Southernhay & Friars CA but with a small area to the west of the site falling within the Central CA. There will inevitably be a change to the setting of the Listed Buildings, but the extent of the change can be minimised through sensitive site layout, massing and materials choices.</p>

Sch 3 Selection Criteria	Roach Planning Analysis
	<p>Almost the entire site is located within an Area of Archaeological Importance so there needs to be an appropriate level of research and assessment, however the previously developed nature of the site indicates that significant archaeological impacts are unlikely.</p> <p><u>No significant effects envisaged on landscapes and sites of historical, cultural or archaeological significance.</u></p>
<u>Types and characteristics of the potential impact</u>	
3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account–	
(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);	<p>The application site is approximately 1.5 hectares in area and is a brownfield site in a city centre location.</p> <p>The proposed development would have certain off-site impacts, for example appearance in the townscape, additional use of local services, additional influence on the local economy, etc. These impacts are also foreseeable and taken into account in the draft allocation in Policy H2 of the emerging Local Plan. However, the impacts of the proposed development are not considered to be significant in the scale of the city of Exeter.</p>
(b) the nature of the impact;	

Sch 3 Selection Criteria	Roach Planning Analysis
	<u>No significant effects envisaged relating to magnitude, spatial extent or nature of impact.</u>
(c) the transboundary nature of the impact;	<u>Not applicable.</u>
(d) the intensity and complexity of the impact;	<u>Potential impacts, such as they are, are not particularly intense or complex.</u>
(e) the probability of the impact;	<u>Since residential development on brownfield sites is relatively routine, a fairly high degree of confidence can be placed on the judgements within this document on potential impacts.</u>
(f) the expected onset, duration, frequency and reversibility of the impact;	<u>Development would reasonably be expected to commence within a year or two of the grant of planning permission. Once constructed, the development would be permanent.</u>
(g) the cumulation of the impact with the impact of other existing and/or approved development;	<u>The development would create a higher density of development in the city centre location, which is in accordance with planning policy and is a location with existing high density levels.</u>
(h) the possibility of effectively reducing the impact.	<u>Mitigation through high quality design and engineering, as envisaged, can be relied upon with a good degree of certainty.</u>

EIA Screening Conclusion

- 3.14 The proposed development does not fall within Schedule 1, but does fall under Schedule 2, Part 10 'infrastructure projects', Clause (b) 'urban development projects...'.
- 3.15 The site is located within a 'sensitive area', i.e. the Exeter City Walls Scheduled Monument, one section of which is located within the site boundary at the western end of the site. There are two sections of the historic walls, one either side of Western Way, used as abutments for a modern footbridge spanning Western Way. The proposed development does not require or comprise any works to the historic city walls or the footbridge. The proposed development would not result in any physical impact to the Scheduled Monument. While its setting would change, it is one already urban in character and existing development is extensive. It is considered that the proposed development would cause no harm to the Scheduled Monument or its setting.
- 3.16 There are no other 'sensitive areas' located within the site.
- 3.17 The proposed development does technically exceed two of the *applicable* thresholds / criteria in column two of Schedule 2, i.e. the site having an area of approximately 1.5 hectares (against an *applicable* threshold of 1.0 hectare) and the proposal being for approximately 172 dwellings but up to 200 dwellings (against the *applicable* threshold of 150 dwellings). Crucially, however, these *applicable* thresholds / criteria are not, in themselves, determinative in EIA Screening – if they are exceeded, all they trigger is consideration of the criteria in Schedule 3.
- 3.18 Planning Practice Guidance is also instructive in this matter. The Guidance, as outlined in paragraph 3.10 above, states that, "*only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment*". The Guidance also establishes *indicative* criteria (different from the *applicable* criteria in Schedule 2 itself, but corresponding to the categories).
- 3.19 The *indicative* criteria are reproduced in paragraph 3.11 above. In relation to them, the site is brownfield, has been intensively developed, mainly as highways and car parking, and is therefore already very urbanised. The residential component of the proposed development is clearly a different use and on a greater scale than the existing use. However, the proposed development comprises up to 200 dwellings, which falls far below the 1,000 dwellings *indicative* threshold referred to in the Guidance. Furthermore, the application site area is only approximately 1.5 hectares in area (However, the application site area is only approximately 1.5 hectares in area in total (of which only approximately 0.7 hectares would comprise residential development), which falls some way below the *indicative* 5 hectare threshold set out in the Guidance. Those *indicative* thresholds are for sites which have not been previously intensively developed, which are usually more sensitive. Furthermore, significant land contamination is not expected to be present; and if any is discovered, it be remediated or removed from site so as to not pose a risk to human health.
- 3.20 In Table 3.1 we have considered in detail whether the proposed development is likely to have significant effects on the environment taking account of the selection criteria in Schedule 3. Our analysis concludes that significant effects on the environment

(population and human health, biodiversity, land, soil, water, air or climate) are not likely as a result of the proposed development.

- 3.21 Taking all of these points into consideration, we conclude that the proposed development is not likely to have significant effects on the environment, so is not 'EIA development' as defined in the EIA Regulations 2017, and an Environmental Statement is not required to accompany the planning application.

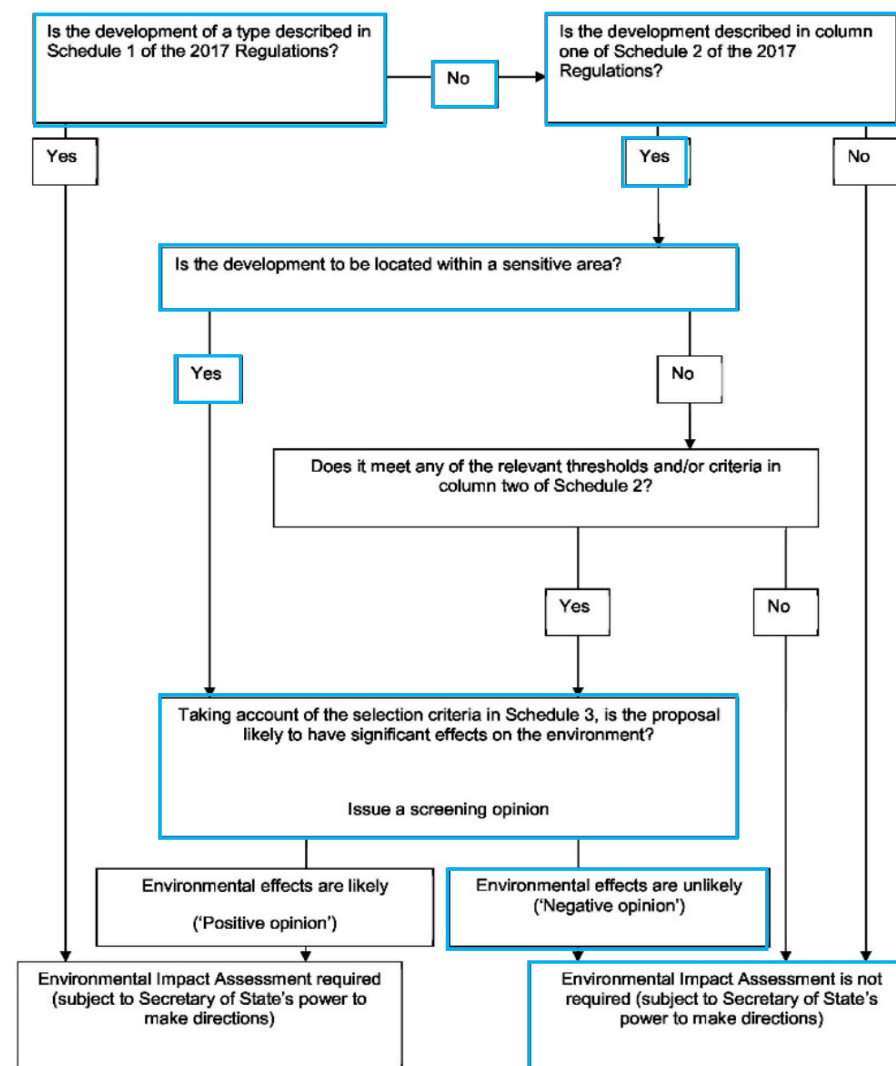


FIGURE 3.2: EIA SCREENING FLOWCHART NAVIGATED BY ROACH PLANNING

4. SCOPE OF HYBRID PLANNING APPLICATION

- 4.1 This section of our report is for information purposes only and is not related to the EIA Screening process described above.
- 4.2 Following a detailed pre-application, political and public engagement process throughout 2023, the intention is to submit a hybrid planning application for the proposed development in February 2024.
- 4.3 Outside of the ambit of EIA, a variety of environmental and engineering surveys and assessments, drawings and other reports will be submitted with the planning application as follows, based on consideration of Exeter City Council’s planning application ‘local list’ of information requirements in the context of the site’s characteristics and the proposed development.

TABLE 4.2: PROPOSED PLANNING APPLICATION DOCUMENTS

Document	Comment
Application form and ownership certificates	No comment
Location plan	For approval
Parameters plan(s)	For approval

Document	Comment
Design and access statement	To include: <ul style="list-style-type: none">• Illustrative elevations/visualisations• Designing out crime statement• Commentary on fire strategy (but not HSE “Form 1” Fire Statement)
Air quality assessment	No comment
Archaeological assessment	Assumes desk-based only
CIL Form 1	No comment
Contaminated land risk assessment	No comment
Preliminary ecological appraisal	No comment
Biodiversity - Defra metric (baseline and proposed)	No comment

Document	Comment
Species surveys	TBC based on outcome of preliminary ecological appraisal
Flood risk assessment	Required if site area >1ha, even in Flood Zone 1
Heritage statement	No comment
Townscape and visual impact assessment	No comment
Lighting design	Detailed for highways, illustrative for residential
Noise impact assessment	No comment
Planning statement	No comment
Statement of community involvement	No comment
Sustainability / net zero carbon statement	No comment
Topographical survey	Already completed

Document	Comment
Transport assessment	No comment
Framework travel plan	No comment
Tree survey and tree constraints plan	Already completed
Arboricultural impact assessment and tree protection plan	No comment
Viability assessment	No comment
Waste audit statement	No comment

