

# DELEGATED REPORT

|                                         |                                                                                                                                |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|
| <b>Application No:</b>                  | <b>P/25/0045</b>                                                                                                               |
| <b>Site Address:</b>                    | <b>Land To The North Of Merthyr Motor Auctions<br/>(MMA)<br/>Red Barrel House<br/>Pant Road<br/>Dowlais<br/>Merthyr Tydfil</b> |
| <b>Development:</b>                     | <b>Underground surface water sewer (SWS) pipe work<br/>(amendment to SWS pipe route approved under<br/>P/21/0364)</b>          |
| <b>Case Officer:</b>                    | <b>Marlene Ferreira</b>                                                                                                        |
| <b>Site Visit:</b>                      | <b>6<sup>th</sup> March 2025</b>                                                                                               |
| <b>Application Expiry Date:</b>         | <b>18th April 2025</b>                                                                                                         |
| <b>Consultation reply date expired:</b> | <b>19th March 2025</b>                                                                                                         |

## APPLICATION SITE

The application site relates to a narrow and long parcel of land measuring approximately 7m wide and 65 metres long, used as an informal open grassed area. It is located approximately 22 metres to the north of Merthyr Motor Auctions (MMA), a car auction business, located off Pant Road, in the area of Dowlais.

The application site is bound by areas of informal space to the north, east, south and west. However, the informal open space to the south, approximately 850m<sup>2</sup>, has been recently granted planning permission, on the 13<sup>th</sup> September 2024, for a 28 space staff and customer parking area, under planning application P/21/0364, to serve the adjoining MMA business, located further south.

## PROPOSED DEVELOPMENT

This application seeks planning permission to lay a 225mm underground surface water sewer (SWS) pipe. The pipe is to provide a private sewer for the surface water drainage of the new and recently approved parking area to serve the adjoining MMA business site (approved under application P/21/0364) to the manhole to the north. Specifically, the revised section of the pipe would be approximately 30m in length, however, the full pipeline is approximately 65m in length and the application site is larger to allow for the laying of the pipe and its future maintenance. The revised section of the pipe would run from the edge of the recently granted car park area, to the northeast, and would meet the remaining section of pipe, which would continue to the northeast and already benefits from planning permission under P/21/0364.

This proposal does not seek planning permission for additional pipework to serve the new and recently approved parking area, but instead, seeks to re-align the recently approved SWS pipeline, as recent discussions with Welsh Water exposed a clash between the approved underground SWS pipeline route and Welsh Water's underground apparatus.

During the consideration of the former application, P/21/0364, consultations were carried out in association with the proposal and no objection was raised by Welsh Water. Thus, this determined that there were no concerns with the proposal and essentially, no conflict between the proposed SWS pipeline route and Welsh Water's underground apparatus. However, recent upgrading and alteration of Welsh Water's equipment below ground has resulted in changes to ground levels, and as such, it has been revealed that there would be a clash. The comments from Welsh Water in this regard were only received by the applicant after the application, P/21/0364, was determined. This application therefore seeks to address the clash between the proposed SWS underground pipework and the existing Welsh Water equipment below ground by altering a section of the route of the SWS pipeline. Once the underground works have been completed, the land would be restored to an open grassed area with landscaping and a tarmac path.

## PLANNING HISTORY

The following planning history relates to the application site and the adjoining MMA business site:

**P/21/0364** – Customer and staff parking area with associated boundary treatments and landscaping – Approved: 13<sup>th</sup> September 2024

**P/23/0110** – Vary condition E of appeal decisions APP6410/C/95/508749 and APP6410/C/95/508750 to allow access to the lower yard after 18:30 hrs for circa 30 vehicles on 2 evenings per week (Mondays and Thursdays) – Refused: 24<sup>th</sup> October 2023

**P/23/0086** – First floor rear extension – Approved: 30<sup>th</sup> June 2023

**P/22/0107** – Rear single storey extension – Approved: 8<sup>th</sup> June 2022

**P/21/0108** - Excavation of embankment to provide extended car parking area – 15<sup>th</sup> April 2021

**P/20/0262** – Removal of condition h attached to appeal decisions APP6410/C/95/508749 and 508750 which currently restricts the use of the floodlights – Approved: 3<sup>rd</sup> September 2021

**P/20/0194** – Temporary change of use of Pant Road Playground to create a secure a parking area for car parking, vehicle storage and on load/offload vehicle transporters, due to the construction of the A465 Heads of the Valleys dualling works, to be used in association with Merthyr Motor Auctions – Approved: 10<sup>th</sup> December 2020

**P/14/0258** – Removal of condition h attached to appeal decisions APP6410/C/95/508749 and 508750 which currently restricts the use of the floodlights – Application Approved: 18<sup>th</sup> November 2015 –Decision Quashed: 6<sup>th</sup> May 2016 – Application Withdrawn: 5<sup>th</sup> December 2019.

**P/13/0074** – Retention of 2no. lamp posts, housing CCTV cameras and P.A. system – Approved: 2<sup>nd</sup> May 2013

**P/12/0022** – Demolish part of building and construct a two-storey extension – Approved: 5<sup>th</sup> April 2012

**P/09/0142** – Removal of condition e (hours of operation of Planning Inspectorate's appeal decision APP6410/C95/508749) – Refused: 17<sup>th</sup> December 2009

**P/08/0093** – Erection of single storey car and van valeting building – Approved: 5<sup>th</sup> August 2008

**APP6410/C95/508749 and APP6410/C95/508750** – Appeal against enforcement notices served for the unauthorised storage, parking and valeting of vehicles in association with the adjacent car auction premises and engineering works – Appeal allowed and enforcement notices quashed – Approved: 21<sup>st</sup> February 1997.

## CONSULTATION

|                                  |                                      |
|----------------------------------|--------------------------------------|
| Head of Engineering and Highways | No objection.                        |
| Estates                          | No response.                         |
| Planning Ecology Officer         | No objection, subject to conditions. |
| Rights of Way                    | No objection.                        |
| Parks Division                   | No response.                         |
| Environmental Health Manager     | No response.                         |
| Welsh Water                      | No objection.                        |
| Arboriculturist                  | No objection.                        |

## PUBLICITY

In accordance with the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, letters were sent to nearby occupiers and 3 site notices were displayed within the vicinity of the site. No letters of representation were received following this publicity exercise.

## POLICY CONTEXT

### National Development Framework

- Future Wales: the National Plan 2040 (February 2021)

Policy 1 – Where Wales Will Grow

*‘The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are: Cardiff, Newport and the Valleys, Swansea Bay and Llanelli, Wrexham and Deeside...’*

#### Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking

*‘The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure...’*

#### Policy 9 – Resilient Ecological Networks and Green Infrastructure

*‘To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to: identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.’*

#### Policy 33 – National Growth Area – Cardiff, Newport and the Valleys

*‘Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region. Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure...The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys...’*

#### National Planning Policies

- Planning Policy Wales (Edition 12, February 2024)

Paragraph 3.3 discusses good design and states it *‘...is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development,*

*design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area...'*

Paragraph 3.4 goes on to discuss the objectives of good design which are characterised into 5 key aspects, these being '*... Access – ensuring access for all; Character – sustaining or enhancing local character, promoting legible development, a successful relationship between public and private space, quality, choice and variety, innovative design; Community Safety – Ensuring attractive, safe public spaces, security through natural surveillance; Environmental Sustainability – Achieving efficient use and protection of natural resources, enhancing biodiversity and designing for change; Movement – Promoting sustainable means of travel...'*

Paragraph 3.22 points out that planning authorities should develop and maintain places that support healthy, active lifestyles across all ages and socio-economic groups.

Paragraph 3.24 discusses the effects of a development on human health and states that '*...Where significant effects on human health are likely to arise as a result of development plans or individual development proposals, environmental impacts should be considered in full knowledge of the likely consequences for health. Information to assess potential impacts on health can be required through various mechanisms, such as sustainability appraisal of development plans and environmental impact assessments, and where relevant, health impacts should be incorporated into such assessments. In general, the most effective and collaborative ways of working will require shared and integrated approaches to evidence gathering and assessments...'*

Paragraph 5.4.1 highlights that the planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

Paragraphs 6.4.2, 6.4.5, 6.4.21 and 6.4.22 relate to biodiversity and protected species and state that '*...The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals. The Nature Recovery Action Plan supports this legislative requirement to reverse the decline in biodiversity, address the underlying causes of biodiversity loss by putting nature at the heart of decision-making and increasing the resilience of ecosystems by taking specific action focused around the 6 objectives for habitats and species....Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity. In doing so planning authorities must also take account of and promote the resilience of ecosystems...Planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for...The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained. Planning authorities should advise anyone submitting a planning application*

*that they must conform with any statutory species protection provisions affecting the site, and potentially the surrounding area, concerned. An ecological survey to confirm whether a protected species is present and an assessment of the likely impact of the development on a protected species may be required in order to inform the development management process...'*

Paragraph 6.7.1 and 6.7.11 refers to air, noise and light pollution '*... air, noise and light pollution can have negative effects on people, biodiversity and the resilience of ecosystems and should be reduced as far as possible... Air and noise pollution are often, but not exclusively, emitted from the same sources, notably road transport, commercial and industrial activities. Consequently, areas of poor air quality often coincide or overlap with areas subject to high noise levels. Even where they do not, poor air quality at one location and high levels of noise at a neighbouring location may be related to one another, depending on the characteristics of the place in question, including the way in which people use and occupy places and the way in which traffic is managed in the wider area. Where air and noise pollution are generated from the same source they should be considered and addressed together and links should be made with active travel and other strategies for reducing vehicular use so as to reduce or minimise, pollution and to ensure an appropriate soundscape...*'

Paragraphs 6.8.1, 6.8.3, 6.8.4 specifically discuss lighting and states '*... There is a need to balance the provision of lighting to enhance safety and security to help in the prevention of crime and to allow activities like sport and recreation to take place with the need to protect the natural and historic environment including wildlife and features of the natural environment, such as tranquillity; retain dark skies where appropriate; prevent glare and respect the amenity of neighbouring land uses; and reduce the carbon emissions associated with lighting...*'

Paragraphs 6.7.22 to 6.7.25 talks about soundscapes. '*...Certain qualities of sound can be associated with particular places and the activities within them. Taking steps to foster the continued longevity of uses and activities which provide wider cultural benefit and experience for people and contribute towards the local economy, both in terms of a vibrancy of place and in creating a space for creativity to flourish, is an important role for the planning system...The potential impacts of noise pollution arising from existing development, be this commercial, industrial, transport related or cultural venues (such as music venues, theatres or arts centres), must be fully considered to ensure the effects on new development can be adequately controlled to safeguard amenity and any necessary measures and controls should be incorporated as part of the proposed new development. This will help to prevent the risk of restrictions or possible closure of existing premises or adverse impacts on transport infrastructure due to noise and other complaints from occupiers of new developments. It will be important that the most appropriate level of information is provided and assessment undertaken...*'

- Technical Advice Notes (TAN's)

TAN 5: Nature Conservation and Planning (2009)

Paragraph 4 refers to nature conservation in development control and states the following:

Paragraph 4.1.1 states that '*...the development control process is a critical stage in delivering the protection and enhancement of nature conservation required by PPW and the following can help in achieving these objectives:*

- *adopting the five-point approach to decision-making - information, avoidance, mitigation, compensation and new benefits;*
- *ensuring that planning applications are submitted with adequate information, using early negotiation, checklists, requiring ecological surveys and appropriate consultation;*
- *securing necessary measures to protect, enhance, mitigate and compensate through planning conditions and obligations;*
- *carrying out effective planning enforcement;*
- *identifying ways to build nature conservation into the design of new development...*

Paragraph 4.3.4 states that ‘...the information submitted with the planning application should be proportional to the likelihood of effects on nature conservation interests and to their potential significance...’

TAN12: Design (2016) advises that the Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment, which is fit for purpose and delivers environmental sustainability, economic development, and social inclusion at every scale throughout Wales.

TAN 18: Transport (March 2007)

Paragraph 2 highlights the integration between land use, planning and transport and states:

2.1 An efficient and sustainable transport system is a requirement for a modern, prosperous and inclusive society. However, transport, in particular road traffic, can also have negative impacts on human health and the environment. Road traffic growth is a cause of increased local air pollution, green house gas emissions contributing to global warming and climate change and, in some areas, congestion, which can affect economic competitiveness.

TAN 23: Economic Development (February 2014)

Paragraph 2 discusses economic objectives and states:

2.1.1 It should not be assumed that economic objectives are necessarily in conflict with social and environmental objectives. Often these different dimensions point in the same direction. Planning should positively and imaginatively seek such ‘win-win’ outcomes, where development contributes to all dimensions of sustainability.

2.1.2 Where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary. There will of course be occasions when social and environmental considerations will outweigh economic benefit. The decision in each case will depend on the specific circumstances and the planning authority’s priorities.

2.1.3 It is a central objective of the planning system to steer development to appropriate locations. Therefore, where a proposed development would cause unacceptable environmental or social harm, demand should be steered to an alternative location, unless the harm is outweighed by the additional benefit of development at the original site in question.

## Local Planning Policies

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) 2016-2031:

- Policy SW4 - Settlement Boundaries
- Policy SW11 – Sustainable Design and Placemaking
- Policy EnW1 – Nature Conservation and Ecosystem Resilience
- Policy EnW4 – Environmental Protection
- Policy EnW5 – Landscape Protection

- Supplementary Planning Guidance (SPG's)

- SPG Note 4: Sustainable Design (July 2013)
- SPG Note 5: Nature and Development (May 2015)

## PLANNING CONSIDERATIONS

The issues to consider under this application relate to whether the re-alignment of the SWS pipe would be acceptable in this location in principle, and whether it would be acceptable with regards to its impact upon the character and appearance of the area, the amenities of nearby residents and ecology.

### Principle of Development

The site lies within the settlement boundary and Primary Growth Area where new development in such areas, is encouraged and supported by LDP Policy SW4 provided it complies with other relevant policies.

The site relates to an area of open green space and LDP Policy SW10 is therefore relevant. This policy states that '*...development proposals that improve the quality, quantity or access to open space will generally be supported. Development proposals that would have an unacceptable adverse impact on or result in a loss of open space will not be permitted unless:*

- *It would not cause or exacerbate a deficiency of open space in accordance with the Council's open space standards or;*
- *The majority of the open space can best be retained and enhanced through the redevelopment of a small part of the site or;*
- *Satisfactory equivalent community benefit or enhanced compensatory provision can be provided in accordance with the Council's open space standards and;*
- *In all cases, the open space has no significant nature or historic conservation importance.'*

Whilst the proposed development seeks to carry out works within the open green space, this relates to a very small parcel of land and includes an underground works only. As such, once complete, the land would once again be restored to an open space area. Furthermore, a much larger and extensive portion of open space would continue to be available further to the north, northeast and the southeast. As such, given the nature and size of the development, it would not be considered to cause or significantly exacerbate a

deficiency of open space in the area. In addition, this small area of informal open green space does not form part of a designated open space within the Council's Open Space Strategy, nor is the site deemed to have any significant nature or historic conservation importance. The proposal would therefore be considered acceptable in principle in this instance and would not be contrary to LDP Policy SW10.

### Character and Appearance

It is acknowledged that the proposed works, which relate to only a narrow and long strip of open grassed land, involved in the laying of the SWS pipe to serve the recently approved car parking area to the south, will cause extensive disruption to the existing landscape and will have a detrimental visual impact on the existing character and appearance of the area. However, the proposal relates to an underground development only. Thus, although it would undoubtedly disturb the grassed open space area, this will be on a temporary basis only. Once completed, the land, as discussed above, will be restored to its former grassed appearance and a tarmac path will be re-laid. Indeed, the laying of the SWS pipe in a revised location would not be deemed any more harmful than the laying of the SWS in its original position, and which already benefits from planning permission under P/21/0364. Furthermore, extensive landscaping (approved under planning permission P/21/0364) would also be carried out, which would include the planting of trees and a sward management (to encourage flower and pollinators) in the open grassed area. In addition, other landscaping works are proposed as part of the wider car park site, adjoining to the south, such as the planting of a native hedge, an evergreen hedge and wildflower areas. The proposed re-alignment of the pipe would therefore not prevent the provision of the landscaping as previously granted (under planning permission P/21/0364) or have any adverse impact on the landscape character of the area in the long term. As such, it is therefore considered that the proposed development, once completed, would amount to an attractive landscaped area and as such, would not be considered to have a significant detrimental impact on the character or appearance of the area. Thus, it would accord with LDP policy SW11.

### Residential Amenity

With regards to the impact of the development upon the privacy and amenities of nearby residential properties, it is considered that due to the nature of the works, as an underground development which would only cause temporary disruption, (like any other development carried out), it would not have any significant detrimental impact on nearby residential occupiers. In this respect, it should also be noted that no letters of representation have been received in respect of this application. The proposal would therefore accord with LDP Policy SW11.

### Ecology

This application has been supported by a green infrastructure statement. The report sets out a step wise approach and includes extensive compensation on-site and off-site, in association with the approved development under planning application P/21/0364. The on-site compensation includes, as explained earlier, wildflower grass seed to be sown in calm weather between April and October on finely cultivated sub soil, spread with a layer of compost, worked into the top layer and watered in. The off-site compensation, immediately adjacent to this application site, includes the planting of a combination of 6 specimen trees, a new single row evergreen hedge *Taxus Baccata* and a native hedge NH1 and NH2 in a double staggered row.

The Council's Ecologist has considered the submitted report and associated plans and has found these to be acceptable. Indeed, it should be noted that the extensive compensation works proposed would serve to enhance biodiversity in the local area in the long-term. Thus, provided the works are carried out in accordance with the GIS, which could be secured by condition, the proposed development would accord with LDP Policy EnW1.

## CONCLUSION

For the reasons set out above the proposed development is considered to be acceptable and complies with the relevant LDP policies.

Finally, the duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 ("the WBFG Act") has been taken into consideration when determining this application. In reaching the following recommendation, the ways of working set out at section 5 of the WBFG Act have been considered and thus the proposal is in accordance with the sustainable development principle through its contribution towards one or more of the Welsh Ministers well-being objectives set out as required by section 8 of the WBFG Act.

Accordingly the following recommendation is made:

**RECOMMENDATION:**     **BE APPROVED** subject to the following **CONDITIONS:**

1. The development shall begin not later than five years from the date of this decision.

**Reason** - To comply with Section 91 of the Town and Country Planning Act 1990.

2. The development shall be carried out in accordance with the following approved plans and documents:

- Sub Concept Plan Drawing No. 6799-WSP-DR-C-500 Rev P06, received: 21st February 2025;
- Drainage Cross Section Drawing No. 6799-WSP-DR-C-509 Rev P02, received: 21st February 2025;
- Drainage Long Section Drawing No. 6799-WSP-DR-C-508 Rev P02, received: 21st February 2025;
- Green Infrastructure, Biodiversity Net Gain and Species Note, Received: 21st February 2025.

**Reason** -To ensure compliance with the approved plans and clearly define the scope of the permission.

3. Prior to the beneficial use of the restored open space area, the enhancement measures proposed, as stipulated in the Green Infrastructure Statement, shall be implemented and shall be retained thereafter in perpetuity.

**Reason** - To protect the natural environment and important habitat in accordance with Policy EnW1 of the Merthyr Tydfil County Borough Council Replacement Local Development Plan.

## INFORMATIVES

1. This planning permission does not provide consent to undertake works that require a European Protected Species (EPS) licence.

All bats and their roosts are protected under UK and European legislation. It is an offence to deliberately kill, injure, capture or disturb a bat or to recklessly damage or destroy their breeding sites or resting places.

If works are planned on a building/tree in which bats are found to be roosting, Natural Resources Wales (NRW) must be contacted. on 0300 065 3000 or at <https://naturalresources.wales/permits-and-permissions/species-licensing/apply-for-a-protected-species-licence/bat-licences/?lang=en>.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and NRW should be contacted immediately.

Under these circumstances, an EPS licence is likely to be required to undertake the works within the law.

2. All birds, their nests and eggs are protected by law under the Wildlife and Countryside Act 1981 (as amended) while they are breeding.

If works to any trees, hedgerows and/or other nesting bird habitat (including buildings with suitable features) are to be undertaken, they will take place outside of the bird nesting season. If the works must be undertaken during the nesting season (generally from 1st March until 31st August, although birds are known to nest outside of these dates in suitable conditions), a breeding bird survey will be required and must be carried out by a suitably qualified ecologist. Any active nests identified will be protected until the young have fledged.

Where a Schedule 1 species (as defined in the Wildlife and Countryside Act - <https://www.legislation.gov.uk/ukpga/1981/69/schedule/1> is involved, compensation for impacts, e.g., loss of nesting sites, will be devised and implemented.

3. The applicant is advised that some public sewers and lateral drains may not be recorded on our maps; some sewers were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist us in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water. Under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

**RECOMMENDATION ENDORSED**



**Director of Neighbourhood Services**

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**DATE: 04.04.2025**