

Buckinghamshire Council

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Report to Buckinghamshire Council - (North Team) Planning Committee

Application Number: 22/03695/AOP

Proposal: Outline application for up to 79 dwellings and

associated works with all matters reserved except for

access.

Site Location: Land North of A413 Padbury Buckinghamshire MK18

2AU

Applicant: Kler Group Limited c/- Cerda Planning Limited

Case Officer: Sarah Armstrong/Jessica Mangos

Ward(s) affected: Winslow

Parish-Town Council: Padbury Parish Council

Date valid application received: 2 November 2022

Statutory determination date: 31 July 2024

Recommendation The application be deferred and delegated to the

Service Director of Planning and Environment for APPROVAL subject to the satisfactory completion of a S106 agreement to secure the matters set out in the report and a district license for great crested newts and no new material representations, and the conditions as proposed, amended or additional conditions considered appropriate by officers, or if these are not achieved for the application to be refused for such reasons as the Service Director of Planning and Environment considered appropriate.

1.0 Addendum to Committee Report 22/03695/AOP

Update to the Committee report.

3.0 Representations

- 3.1 There has been a total of 109 individual objections received from the public (including to the original and amended plans). Comments from internal experts, statutory consultees and the Padbury Parish Council have also been included below. These have been clearly set out in Appendix A.
- 3.2 Unfortunately, the comments of Padbury Parish Council were mistakenly omitted from the Appendix A which contains consultation responses. Please find below the full comments from Padbury Parish Council.

Comments on application as originally submitted December 2022:

Padbury Parish Council objects to this application in the strongest possible terms which are set out below. Should this application not be refused under the planning officer's delegated powers, then Padbury Parish Council would wish to appear before any meeting of the Planning Committee that considers this application. Notice of any such meeting should be made widely available so that residents from Padbury can attend if they wish.

As of 12 December there were 91 objections from Padbury residents. As a proportion of the dwellings in Padbury this represents 22% of the village. In addition there are objections from all three county councillors who represent Padbury and the local Member of Parliament.

There have been no letters of support.

As a separate objection, a petition against this planning application signed by residents has been submitted.

The parish council is concerned about the quality of the information submitted in support of this application and this should be taken into account when considering this planning application. For example, the traffic assessment makes reference to the generation of 'two train trips in a peak hour'. There is no train transport serving Padbury. The reference to two train trips in a peak hour is repeated in the Design and Access statement which is authored by Kler Group itself. The traffic assessment makes reference to roads that do not exist in Padbury. The planning statement' authored by Cerda Planning, the main advisor to Kler Group, refers to the need for applications to be determined in accordance with the development plan. It then lists the Aston Clinton Neighbourhood Plan as part of the development plan. The developer had a planning application at Aston Clinton so it is assumed that this current document is a cut and paste from a previous application and not relevant to Padbury.

Planning policy

Planning policy applicable to this proposal is contained within the Planning and Compulsory Purchase Act 2004, the National Planning Policy Framework (NPPF) revised in July 2021, and the recently adopted Vale of Aylesbury Local Plan (VALP).

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states:

If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The VALP was adopted in September 2021 and is fully in accordance with the NPPF 2021 and is therefore the primary document when determining the application. This plan went through a prolonged period of public consultation and review by an inspector appointed by the Secretary of State for Housing, Communities and Local Government. It is not a plan to be lightly set aside. The Parish Council can see no 'material considerations' that would support moving away from local plan policy.

Pre-application advice from Buckinghamshire Council was that this application was in conflict with the VALP. The developer has chosen to ignore this.

Scale of the development

The scale of the development is out of proportion to the size of the village. Currently there are 376 dwellings in Padbury (data supplied by the senior information request officer at Buckinghamshire Council). This includes the 40 houses on the Padbury Fold estate. That estate represented an 11.9% increase in the number of dwellings in Padbury. The proposed development of 81 dwellings would be a further increase of 21.5%. Overall that would equate to an increase of 1/3 over a few years, with no increase in infrastructure except a toucan crossing and some 'intelligent' bus stops.

Housing targets and spatial strategy

The VALP sets housing targets for the period 2013 to 2033. VALP policy D2 lists the allocated sites within medium villages. Padbury is 'allocated' 52 dwellings, the majority of which are the 40 houses on Padbury Fold. Our understanding is that the majority of the balance have already been built. Therefore in terms of housing allocations Padbury is fully compliant with the VALP.

Policy D3 'Proposals for non-allocated sites at strategic settlements, larger villages and medium villages' outlines the criteria for development of unallocated sites within medium villages. It notes that proposals for development in other locations will be determined on the basis of the policies within VALP and made neighbourhood plans. Padbury does not have a made neighbourhood plan so only the policies in the VALP are relevant.

D3 exceptionally allows for further development beyond the allocated sites but only if new housing across Aylesbury Vale is not being delivered at the anticipated rate. According to Buckinghamshire Council's Five Year Housing Land Supply Position Statement, the Aylesbury Vale area has a deliverable supply of 5.2 years as at 1st April 2022. In paragraph 5.11 of their planning statement, the applicant's agent has stated:

Emery Planning have been commissioned to carry out an assessment of this housing land supply position. The assessment carried out suggests that the Aylesbury Vale area has a realistic deliverable supply of 2.82 years, when measured against the calculated annual housing requirement.

However, this assessment has not been posted on the public file so presumably it has not been submitted with this application. This prevents proper public scrutiny of this assessment and the conclusion that the 5 year supply is not as stated by Buckinghamshire Council, which has been calculated using laid down procedures. Based on the evidence of Buckinghamshire Council's 5 year housing figures, there is no justification nor policy reason to move away from the VALP housing allocations.

Even if the housing targets are not being met, policy D3 lists a further six criteria. ALL of which must be met, so the failure to meet just one of these criteria is sufficient for the application to be refused.

D3 requires that the development be of a scale and in a location that is in keeping with the existing form of the settlement and would not adversely affect its character and appearance. As set out above in the section **Scale of the development** the proposed development is not of a scale. Located on the edge of the village it is not in a location that is in keeping with the existing form of the settlement, and being so it will adversely affect the village's character and appearance. It thus fails on this criteria.

As described later in this objection statement, the proposal will have an adverse impact on environmental assets such as landscape, historic environment, waterways, open space and green infrastructure. It thus fails on this criteria which requires an application not to have 'ANY adverse impact'.

The final criteria is that proposal must provide appropriate infrastructure provision such as waste water drainage and highways. As set out below, the existing sewage system is already overloaded and this development will only make this situation worse. As regards other infrastructure, the school is full and generally the village does not have the facilities that would be expected given the size of the proposed development. It thus fails on this criteria

As shown above, the proposal for 81 houses at the edge of Padbury does not accord with the principles outlined within VALP policy D3.

Part h of policy S2 'spatial strategy for growth' is also relevant. It states: h. At medium villages, listed in Table 2, there will be housing growth of 1,423 at a scale in keeping with the local character and setting.Development that does not fit with the scale, distribution or requirements of this policy will not be permitted unless bought forward through neighbourhood planning..............

Table 2 mentioned within the policy states that there are 52 units completed or committed at Padbury, with no new allocations proposed. These presumably meet the criteria of being 'at a scale in keeping with the local character and setting'. Further development that is not in keeping with the scale of Padbury is not permitted unless brought forward by a neighbourhood plan. 81 dwellings is not in keeping with the scale of Padbury and currently there is no neighbourhood plan.

Policy S3 'Settlement hierarchy and cohesive development' states:

The scale and distribution of development should accord with the settlement hierarchy set out in Table 2, the site allocation policies that arise from it and the requirements of Policy S1. Other than for specific proposals which accord with policies in the plan to support thriving rural communities and the development of allocations in the Plan, new development in the countryside should be avoided

As this proposed development is at the edge of Padbury it is in the countryside, therefore should be avoided per the above policy.

Policy S5 'Infrastructure' requires that all new development must provide appropriate infrastructure on and off the site, avoid placing additional burden on the existing community and avoid adverse environmental impacts. Also in planning for new development, appropriate regard will be given to existing deficiencies in services and infrastructure provision. Development proposals must demonstrate that these have been taken into account when determining the infrastructure requirements for the new development. As is shown in the following text, there are existing deficiencies in services and infrastructure in the village and this proposal will only increase such problems.

Thus in spatial strategy terms, this application is not in accordance with policies S2, S3 and S5 of VALP.

Sewage

The proposal for sewage drainage is to connect to the existing foul water network in Lower Way. The response from Anglian Water makes a very short statement that the existing Padbury sewage works has the available capacity for the proposed development. We find the response from Anglian Water unbelievable. They seem to have ignored the near daily evidence that is presented to them by Padbury residents of flooding and sewage outflows in parts of the village. This point was made repeatedly by residents at the meeting with the Cerda Planning representative but has been ignored. Both the developer and Anglian Water have ignored that the network is already overloaded which this development will make worse.

Our understanding is that the existing sewage works, built in the 1950s and also serving Adstock, is under strain and having difficulty coping with current flows with extra sewage tankers already in use. In 1960 the average water usage per day per person was approximately 85 litres. It is now approximately 150 litres. Since then the number of houses in the village has increased by approximately 145. The school has increased from infants only to become an infants and junior school and there is now a playschool. A sports pavilion was built in the 1980s with six toilets and two communal showers for teams. All this will have led to a very large increase in the consumption of water, the majority of which will enter the sewage system which has not increased in capacity since built.

Another 81 dwellings will have an obvious negative impact on the sewage system.

We have asked the Chief Executive of Anglian Water to provide the following information to better understand their response that there is no problem with the sewage system in Padbury:

- Details of the design criteria for the treatment system at Padbury, including capacity, design flows and biological loading.
- 2. Records of flow monitoring of the outfall volumes for the last five years, we understand that your consent to discharge requires a flow monitoring system to be in place and records to be kept.
- 3. Records of the quality of the outfall for the last five years, we understand that your consent to discharge requires 12 samples to be taken a year and records to be kept.
- 4. Numbers of tankers attending this site on a weekly basis for the last six months.
- 5. Details of calls and complaints to Anglian Water over the last six months concerning sewage and flooding problems in the Padbury, together with a note of how resolved.

We have invited the Chief Executive to a meeting of the Parish Council to share his views on how the existing problems can be solved, and not made worse by the proposal for 81 new dwellings.

There is also the problem of 'nutrient neutrality' of sewage flows into Padbury Brook. This is not a matter addressed in the planning application. It is unclear if Buckinghamshire Council has sought advice from Natural England about this matter but given the increase in 'usage' at the sewage works this is a key issue.

We suggest that Buckinghamshire Council critically review the response they have received from Anglian Water, seek the same information that we have requested, and seek advice from Environment Agency and Natural England.

Surface water drainage

Surface water will be discharged into an existing drainage ditch along the northern site boundary. It is understood that surface drainage from the existing Padbury Fold site is causing problems for neighbouring farms. This would increase substantially with the proposed development. In addition the 'surface water balancing area' is of a significant size and could pose health and safety issues as a large pond of stagnant water.

There is a detailed comment on surface water drainage from a representative of Adstock Parish Council and the flood risks posed by the development which we support.

In addition we would make the following comments. The Flood Risk Assessment and Drainage Strategy states at paragraph 3.13 that the site has low infiltration rates, ie surface water would drain slowly into the soil. This is repeated at paragraph 7.6 that the ground is effectively impermeable. Paragraph 7.7 then states that an alternative outfall such as a watercourse or surface water sewer needs to be considered.

However, at paragraph 9.4 pervious surfacing is listed as part of a sustainable drainage system (SUDS). This would just lay a pervious layer over impervious soil and not be a solution at all. There would simply be greater surface water run-off and contribute to the flooding risk described by Adstock Parish Council. Other aspects of the SUDS proposal are to plant trees, which will obviously take some time to have an effect and the use of small water butts, presumably by householders. It is not clear if such water butts will be provided by the developer. Thus it seems that the SUDS plan is not viable for this site.

This is another example of an inconsistency in the 'evidence' offered in support of this application.

A further such example relates to the question on the application form about surface water disposal. The answer to this question is that a sustainable drainage system will be implemented, and not by way of an existing water course. Yet the applicant's expert report 'Flood risk assessment and drainage strategy' states that the proposed development will discharge surface water runoff into an existing land drainage ditch. This seems contradictory.

The Adstock Parish Council makes reference to the risk of flooding depending on the operation of a valve. The SUDS proposal lists a range of maintenance tasks, some of which are noted as to be carried out monthly. The proposal is silent on how and by whom this maintenance will be carried out.

Educational provision

According to the information on the education section of the Buckinghamshire Council website Padbury Church of England School has a capacity of 105 pupils. 15 new pupils are admitted each year into the reception class.

Our understanding is that both the school and pre-school are full with no room to expand. With 81 new dwellings there will be children. Potentially children up to age 11 will have to be schooled outside the village.

The published admission criteria for the school notes that in the event of a 'tie' in considering the admission of children to the school, the distance from home to school will be the deciding

factor. The effect of this is that, given the proximity of the proposed site to the school, children living on this development will have priority over children living at the opposite end of the village who may well have lived in the village for much longer.

Green Infrastructure

The Design and Access statement provided by the developer states that public open space to be provided within the site will be 1.43 Ha. This will include the proposed surface water balancing area.

This does not accord with VALP policy I1 - Green Infrastructure - as amplified by Appendix C: standards for Accessible Natural Green Space. This requires that no person should live more than 300m from an area of natural green space of at least 2ha in size. The size proposed by the developer does not meet this requirement and it is difficult to understand how a surface water balancing area can be described as natural green space.

Noise

VALP policy NE5 'Pollution, air quality and contaminated land' states that planning permission for noise-sensitive development, such as housing, will not be granted if its users would be affected adversely by noise from existing uses. The noise survey carried out for the developers makes no mention of the noise caused by the power lines that cross the site. These can generate significant levels of noise which have an adverse effect on the potential residents of this proposed development.

Traffic

The traffic assessment is unrealistic and does not consider the context of the proposed development.

Of the 81 proposed dwellings, 57 would have 3 or more bedrooms. This suggests 2 or 3 cars per household. That means between 114 and 171 cars on the estate plus a few for the smaller properties so say between 130 and 190 cars. The plan of the development shows approximately 150 parking spaces.

There are effectively no employment opportunities in the village, retail outlets are very limited and the local school is full with no room to expand so children will have to be driven to other schools. With limited public transport there will be large outflows and inflows of traffic as residents commute, shop and take children to school.

Instead of considering the local context, the Transport Statement submitted with this application draws heavily on a national database of traffic flows to/from developments elsewhere in England. Using this data, the report concludes (on page 16, paragraph 4.3) that for 85 dwellings there would likely be 40 departures in the morning peak and 34 arrivals in the afternoon peak, far fewer than is suggested above.

The report then uses data from the 2011 National Census 'Method of travel to Work' (dataset QS701EW). It notes that this approach is appropriate for calculating person trip generation as it is reasonable to assume that new residents at the development will display similar travel patterns to existing residents in the area. Using this approach leads the report to conclude that the proposed development is 'expected to generate up to six pedestrian trips, one cycle trip, two bus trips, and two train trips in a peak hour'. It is unclear what this means. Does it

mean for example that two residents will travel by train, and if so how they get to the train station? Or is it another inappropriate use of modelling that does not take into account the realities of this proposed development in a village with no employment opportunities.

Adstock Parish council has submitted a lengthy critique of this data modelling and we would refer you to that. In addition, diagrams 1 to 8 show traffic counts and refer to the A41, which is not a road in Padbury. Paragraph 2.12 refers to vehicle speeds along 'Melton Road fronting the site', this is not a road in Padbury. Although probably simple mistakes it does raise concerns about the accuracy of this traffic assessment as a 'cut and paste' from an assessment at a different place and not relevant to this planning application at all.

The results produced by this modelling are inconsistent.

At paragraph 7.1 it is noted that the 'Guidance on Transport Assessment' suggests that 30 or more two-way traffic movements in a peak hour is the point at which to consider that a development will have an adverse impact on the local highway network. Various traffic counts are then given for the junction between Main Street and the A413. These are all below 30 so the conclusion is that there is no adverse traffic impact. However, paragraph 4.3 referred to above has two-way traffic movements in a peak hour as 51 in the morning and 48 in the afternoon at the entrance to the development. The 30 two-way traffic movement threshold is easily exceeded. The development causes an adverse impact on the local highway network at its entrance.

It is proposed to move the 30 mph speed limit from its current position to further out of the village. The new position would be on the bend in the A413 and motorists would have limited notice of the change in speed limit from 60 mph to 30 mph.

Of note is the claim by two motorcycle groups that the A413 through Padbury is an excellent route for motor cyclists (links below).

https://www.motorcyclenews.com/news/ride5000miles/ride5000miles-silverstone-gp/https://www.bestbikingroads.com/motorcycle-roads/united-kingdom/south-eastengland/ride/a413-aylesbury-towcester

This is a factor which is not taken into account in the traffic assessment. This motorcycle traffic is marked on Sundays when it may be expected that residents of the proposed development will be exiting the site for leisure activities in their cars as there is no public transport provision on a Sunday.

Village facilities

The Settlement Hierarchy Assessment 2017 identified Padbury as a "medium" village. This was because Padbury had two pubs, an employment site, a local convenience store and sports grounds. The 'local convenience store' is a butchers and albeit well regarded, does not offer the range of goods that a convenience store would. It is unclear what the employment site was. There are no employment opportunities in Padbury other than at the butchers, pubs and school. One of the pubs has only just reopened after an extended period of closure which indicates the precarious nature of public houses.

While it is not clear why Padbury was classed as a medium village, the facilities described above are limited for the current size of the village. Indeed, the officer's report on application 15/03744/AOP (for the houses on Padbury Fold) noted that the existing infrastructure within

the village was 'already running hot'. That situation can only worsen if this application is approved.

Conservation area and location

Much of the village is within a conservation area. Such a large development will totally alter, and not for the better, the character of the village and the context of the conservation area. The proposed development is outside the built boundary of Padbury. In 2013 an application (12/02257/APP) for a single house adjacent to the Springfields estate was refused as it was outside the existing built development of Padbury. It was deemed to be detrimental to the visual amenities of the area and harmful to the public views of the site and of the entrance to the village. The refusal noted that the application was contrary to two policies of the Aylesbury Vale District Local Plan that was in force at the time:

- RA14 Development at the edge of settlements; and
- GP35 Design of new development proposals.

Policy RA14 is carried forward in the current Vale of Aylesbury Local Plan as policy D3, referred to above. Policy GP35 is carried forward as policy BE2 - design of new development. This latter policy requires that all new development proposals must respect and complement the site surroundings including the scale and context of the site and its setting. That earlier application was for one house, this one is for 81 dwellings and it does not meet the requirements of policy BE2.

The proposal (15/03744/AOP) for the houses on Padbury Fold was considered to have significant adverse landscape impact in both localised and wider views to/from the north of the A413. This factor was then afforded significant negative weight in the planning balance. That issue is even more so for this proposal which is twice the size.

The proposed development, in terms of both scale and location, would unbalance the structure of the settlement, and realistically result in a 'second' community focus being formed within the village, separated from the historical centre (which has most of what few facilities the village possesses). This could pose a negative impact on social cohesion and community spirit within the village.

Power lines

The site is crossed by a high voltage power lines. These generate electric and magnetic fields (EMFs). Government policy on the protection of the public from the possible risks of long term exposure to EMFs is to comply with the material issued by the International Commission on Non-ionising Radiation Protection.

The Government considers that the potential for significant exposure from EMFs could occur in residential properties where members of the public spend an appreciable proportion of their time. Also the area under the power line is shown as public open space. It is inevitable that children will play here. There is only a single play area noted on the plan and this is very close to the power lines. Children are likely to spend periods of their time in these places. In the light of these possible risks to public safety the application should be rejected.

Archaeological

The archaeological desk based assessment of the site claims that the ridge and furrow field system was destroyed by ploughing. This is not the case, as planning application

97/01203/APP shows. The site was deliberately levelled by the dumping of unknown materials. The geophysical survey identified ferrous debris across the site which could have come from the materials dumped and may pose an environmental hazard. The survey also identified a Bronze Age barrow and noted that this could be well preserved. Building on the site could destroy an important archaeological asset.

Contaminated land

Following from the above, VALP policy NE5 is relevant. This requires that where development is on land that may be affected by contamination, as suggested by the archaeological assessment and planning application 97/01203/APP then a contaminated land assessment must be carried out. No such assessment has been presented. Indeed the application form states that in no part of the site is the presence of contaminated land suspected, which does not appear to be the case.

Landscape

The proposals do not accord with the 'landscape character assessment' (LCA) published for Buckinghamshire. This work was commissioned in 2008 by the then Aylesbury Vale District Council and Buckinghamshire County Council. The purpose of a LCA is as a tool to help decision making in the planning process. It is to ensure that development is sustainable and does not undermine local distinctiveness, essential character or sense of place. This study divided Buckinghamshire into a number of areas, one of which was Padbury. It concluded that the area should follow a 'conserve and reinforce' programme. Actions that affect the landscape should conserve distinctive features and features in good condition, and strengthen and reinforce those features that may be vulnerable. Specifically it recommended:

- The preservation of historic earthworks and ridge and furrow fields.
- The promotion of new woodland particularly where it will reduce the visual impact of pylon lines.
- Encouragement of minimum cultivation to protect buried archaeological remains.
- The maintenance and improvement of the extent and condition of unimproved, neutral and semi-improved grassland wherever possible.
- The preservation and enhancement of countryside views from publicly accessible land.

The site of the proposed development does have historic earthworks and ridge and furrow features, the visual impact of electricity pylon lines will be increased, buried archaeological remains will not be protected and grassland and views will be lost.

Thus the application should be rejected on this non-compliance with the LCA.

The proposed development would permanently change the character of the site from open countryside, typical of the wider LCA character, to an area of built development. This character change would be incapable of being mitigated and must reasonably be concluded to be permanent and significantly adverse in landscape character terms. This character change would be perceived to varying degrees from the surrounding landscape and would result in changes to the nature and extent of the existing wider LCA in a way that was contrary to the LCA guidelines to 'conserve and reinforce' the character of the LCA's landscape character baseline.

Other matters

The ecological appraisal has redacted sections which presumably relate to badgers. Local knowledge suggests that there is badger sett in the area so it is unclear if this application may cause an offence under the Protection of Badgers Act 1992.

VALP policy C3 'Renewable Energy' requires an energy statement for planning applications of over 10 dwellings. There is no such statement in this application.

The same policy requires a feasibility assessment for district heating for all residential developments in off-gas areas for 50 dwellings or more. There is no mention in the application of how the development will be heated so it is impossible to determine if this policy has been complied with.

Policy C3 notes that Aylesbury Vale is located within an area of water stress. The council will therefore seek a higher level of water efficiency than required in the Building Regulations, with developments achieving a limit of 110 litres/person/day. The application does not deal with this matter.

Comments - July 2023

Further to the Parish Council meeting held on the 11th July, the Council comments as follows:

We have commented on this application at length in our response filed on 15 December 2022. Nothing in these latest documents changes our previous comments. This development is not welcome. We note the continued slap dash nature of these 'expert' reports. Despite including correspondence from Buckinghamshire Council, the ADC Infrastructure report continually refers to Buckinghamshire County Council, an entity which ceased to exist in 2020. The same report notes that there was a lack of objections to planning application 15/03744/AOP - outline planning permission of up to 40 houses. Even a cursory glance at the appropriate page of the Buckinghamshire Council website will show that this was not the case. There is a far greater level of objection to this latest speculative application. If such simple matters cannot be properly reported there must be doubt about the correctness of the rest of the report. The flood risk addendum does not deal with the issue of flooding in parts of the village which increased after the 40 houses were built and is only likely to get worse.

Comments on amended application – July 2024

The Picardy models used in the traffic survey do not include the blocking effect on the main road caused by traffic turning right into the proposed development. Nor does the Picardy output include the road layout map to show how the model was constructed and how well it represents reality.

The TRICS data is based on urban areas such as Great Yarmouth, Rayleigh, Aylesford etc. These are not representative of a rural area that has much less availability of public transport and opportunities for walking to destinations, that is car use will be much greater here. Of the 21 sites used for traffic data comparison. 13 are dated prior to 2021, with some as far back as 2014. This is not realistic data on which to make comparisons.

The traffic data in appendices G, H and I looks impressive but each is for a single day, and for only 3 hours per day. The surveys in appendices G and H were taken on 17th August 2022 which is in the school holidays, so hardly representative of traffic flows. The TRL, whose methodology is used here, note, in a somewhat topical observation, that using data from a single day is like deciding a general election with a single vote.

This is not adequate data on which to make planning decisions and is likely to significantly understate the real traffic flows.

As stated within the Parish Council's comments their objection was accompanied by a petition containing 130 signatories objecting to the application. A number of the signatories have also submitted more detailed objections that have been considered as part of the planning assessment.