To:

From:

MARTYN EDWARDS

VICKY PARISH

ASSISTANT DIRECTOR, PLANNING & ENVIRONMENT ADMINISTRATION SUPERVISOR

TEL EXT: 4589

CC: RICHARD KENT, WEST AREA SUE BUCK, SENIOR LEGAL ADVISER COUNCILLOR AP REES COUNCILLOR DAWS COUNCILLOR KNIFTON

My Ref:

VEP/JW/99/1226

Your Ref:

JW

Date:

2 MAY 2000

TOWN AND COUNTRY PLANNING ACT 1990 APPEAL BY BRYANT HOMES SOUTH WEST LIMITED SITE AT LAND AT PARK FARM, OFF PARK ROAD, CONGRESBURY, NORTH SOMERSET

X The above appeal has been dismissed

The above appeal has been allowed subject to conditions

X Attached is a copy of the Inspector's decision

The time limit for appeals in this case:

4 weeks (Enforcement)

X 6 weeks (Planning)

and accordingly any appeal must be lodged by 9 JUNE 2000.

Vicky Parish

Administration Supervisor

Enc.

South Area Committee Chairman - Councillor Peddlesden



The Planning Inspectorate

Room 1015 Tollgate House Houlton Street Bristol BS2 9DJ Direct Line Switchboard 0117-9878868 0117-9878000

Fax No

0117-9878624

GTN

101374-8868 L COUNCEL PLANNIE G & EN ARORMENT DIRECTOPATE

AORIGATION NO

Miss V Parish North Somerset Council Admin Supervisor Planning & Environment Dept P O Box 143, Somerset House Weston-Super-Mare

NORTH SOMERSET, BS23 1TG

Your Ref: 99/1226

Acrystante Date 0 2 MAY 2000

Our Ref:

APP/D0121/A/99/1031669

28 April 2000

Dear Madam

TOWN & COUNTRY PLANNING ACT 1990 APPEAL BY BRYANT HOMES SOUTH WEST LIMITED SITE AT LAND AT PARK FARM, OFF PARK ROAD, CONGRESBURY, NORTH SOMERSET

I enclose a copy of our Inspector's decision on the above

If you have any queries relating to the decision please send them to:

The Complaints Officer The Planning Inspectorate Room 14/04 Tollgate House Houlton Street Bristol BS2 9DJ

Phone No. 0117 987 8927

Fax No. 0117 987 6219.

Yours faithfully

Mrs A Morgan

211B



Appeal Decision

Inquiry held on 14-16 March 1999

The Planning Inspectorate
Tollgate House
Houlton Street
Bristol BS2 9DJ

■ 0117 987 8927

by J E Braithwaite BSc(Arch) BArch(Hons) RIBA

An Inspector appointed by the Secretary of State for the Environment, Transport and the Regions

Date

28 APR 2000

Appeal: T/APP/D0121/A/99/1031669/P7

- The appeal is made under Section 78 of the Town and Country Planning Act 1990 against a failure to determine within the prescribed period an application for planning permission.
- The appeal is brought by Bryant Homes South-West Limited against North Somerset Council.
- The site is land at Park Farm, Off Park Road, Congresbury.
- The application (ref: JP/99/1226) is dated 25 May 1999.
- The development proposed is 'outline application for residential development of up to 25 units and associated open space and means of access'.

Decision: The appeal is dismissed and planning permission is refused.

Background

- 1. The emerging Local Plan for the North Somerset Council area was the subject of an inquiry into objections held between 1995 and 1997. The Inspector's report, which was published in September 1998, included the observation that one of the "most significant issues to give concern" was "the substantial shortfall in meeting the strategic distribution of housing and employment land". To meet this shortfall he recommended, amongst other things, that the local plan be modified to allocate the appeal site and to include it and a neighbouring farm and bungalow within the settlement boundary of Congresbury.
- 2. The Council considered the report in April 1999 and decided to reject the recommendation on the basis that there had been a significant change in circumstances since the Inspector's report was published, that there was no longer a substantial shortfall but in fact a surplus, and that there was therefore no need to allocate additional sites. Subsequently, a planning application was submitted for the same development that had been recommended by the Local Plan Inspector. The Council's failure to determine the application within the prescribed period has led to this appeal.

Procedural matters

3. The application was submitted in outline form with all matters, except means of access, reserved for future consideration. The appeal will be determined on the same basis. A copy of a signed agreement made under Section 106 of the Town and Country Planning Act 1990 was submitted at the inquiry. The agreement satisfies several of the Council's concerns and deals with the provision of affordable housing, open space land and off-site highway works, and the preparation and implementation of an ecological management plan for the open space land.

4. The main issues are, first, the effect of the proposal on the character of Congresbury and the surrounding countryside, and second, whether the development is in accordance with relevant The main issues Development Plan policies on housing provision and whether there are any considerations, such as government planning guidance and emerging plan policy, that justify making a decision contrary to those policies.

The Development Plan and other planning policy

- 5. The Development Plan comprises the Avon County Structure Plan incorporating Adopted Third Alteration (SP), approved in 1994 and covering the period to 2001, and the Woodspring Rural Areas Local Plan (LP), adopted in August 1991 and intended to cover the period 1985-1996. The SP is due to be replaced by the Joint Replacement Structure Plan (JRSP), placed on deposit in June 1998 and intended to cover the period to 2011, and the LP by the Woodspring Local Plan (WLP), placed on deposit in January 1995 and intended to cover the period up to April 2001. Though the LP is a dated document, until the adoption of the WLP, it does form part of the Development Plan. LP policy WRA/H1 states that the erection of dwellings normally will not be permitted on land in the open countryside outside the village fences as defined on the inset maps. The appeal site lies outside the village fence for Congresbury.
 - 6. SP policy H.4 provides that residential development in and immediately adjoining settlements not in the Green Belt with reasonable access to a primary level of community services will normally be permitted provided that the character of the settlement is not adversely affected. WLP policy HOU/4 lists those settlements subject to SP policy H.4. The list includes Congresbury. However, WLP policy HOU/4 begins "Within the settlement boundaries of the following villages..." and the WLP makes no provision for residential development outside settlement boundaries. For the proposed development to comply with the WLP the settlement boundary would have to be redrawn to encompass the appeal site, as the Local Plan Inspector recommended. Given also that the SP provides adopted strategic policy for the area, and that even if it were to be adopted the WLP may be the subject of challenge and further modification, greater weight is given to the provisions of SP policy H.4 than to WLP policy HOU/4.
 - 7. SP policy C.1 states, amongst other things, that the use of agricultural land for any form of development not associated with agriculture will normally not be permitted unless the circumstances and need for development are supported in the SP. The support for the use of agricultural land such as the appeal site would come from the land's proximity to settlements subject to SP policy H.4 and from the need to allocate land to meet SP housing requirements. SP policy C.7 states that development proposals in the countryside which would detract from the landscape character or quality of the locality in which they are sited will normally not be permitted. SP policy H.8 provides for the construction of 10,450 dwellings in Woodspring (now
 - 8. The draft JRSP, in policy 33, increased the number of dwellings to be constructed in North North Somerset) in the period 1989-2001. Somerset to 13,800. The EIP into the JRSP was held in March 1999 and the Panel's report was published in June 1999. The report recommended an increase in the North Somerset dwelling requirement to 17,700. In October 1999 the Joint Authorities (including North Somerset) resolved to reject this recommendation; a decision that has led to an objection from the Government Office for the South West (GOSW) to the JRSP Proposed Modifications and that has contributed to the Secretary of State for the Environment, Transport and the Regions issuing a holding direction that prevents the JRSP from being adopted by the Joint Authorities.

Inspector's reasons

The first issue

- 9. The appeal site is, apart from land associated with the means of access, an open grassed field of about 3.2 hectares. The west boundary is defined by a fence and hedge to the rear of relatively modern semi-detached dwellings on Park Road. To the north of the site and set behind dwellings on Park Road is Park Farm, which comprises a farmhouse and a barn that has recently been converted into a dwelling, and a detached bungalow, Small Acre. A substantial hedge to another open field defines the remainder of the north boundary. The south boundary is defined by a fence and hedge to the rear of dwellings on Mulberry Road and to an orchard/paddock that lies to the east of a small recently constructed housing development, off Mulberry Road, known as Pineapple Farm. The built form of Congresbury, and the current adopted settlement boundary, extends up to and along the west boundary of the site and up to and along the south boundary up to north-east corner of the Pineapple Farm development. The east boundary is also defined by a mature hedge.
- 10. The appeal site slopes gently away from its south-west corner, which is about 14.0 metres AOD, to its north-east corner, which is around 8.3 metres AOD. The adjoining open farmland to the north and east continues to slope towards the meandering Congresbury Yeo River. Across the river is low lying farmland beyond which, to the north-east, is a wooded ridge that rises to about 172 metres AOD at Corporation Woods. Public footpath AX 16/8 diagonally crosses the site from the north-west corner to a stile in the south-east corner, footpath AX 16/29 follows the site's east boundary and there is an extensive network of footpaths within the valley. The proposed vehicular means of access would be off a short cul-de-sac, which currently provides access to the three dwellings, that has a junction with Park Road.
- 11. The three detached dwellings are set well apart and only the curtilage of the farmhouse adjoins the east boundary of Congresbury. The farmhouse and the converted barn still retain an agricultural appearance that links them to the surrounding previously associated farmland, the buildings are visually associated with the rural landscape within which they are located and they clearly do not form part of the built form of the settlement. Consequently, it cannot be claimed that 'urban' residential development adjoins any part of the north boundary of the site. Only the west boundary and part of the south boundary adjoins the built up area of the village that is contained by the settlement boundary.
- 12. A development concept plan, drawing no. CPM 1251/39a, though a sketch drawing, does give an indication as to the likely distribution of the proposed 25 dwellings. The drawing indicates that the site would be divided into two parts; the west part being occupied by the proposed dwellings and the east part by the proposed public open space (POS) that would accommodate a children's play area. The dividing line would extend from the north-east corner of the Pineapple Farm development to the north boundary hedge. Footpath AX 16/8 would be retained in its current position and would be contained in a landscaped corridor where it would pass through the housing development. To the north-east of the footpath there would be six dwellings in two groups of three either side of the access road into the site. The three dwellings to the east of the road would have rear boundaries to the POS. To the south-west of the footpath would be 19 dwellings including five affordable housing units. It is acknowledged that the location of the children's play area and the position of any of the dwellings could be the subject of suitable planning conditions.

- 13. The only part of the appeal site that could be regarded as being contained by existing development is the imaginary triangle bounded by existing dwellings to the west and south. Development of this imaginary triangle of land, or even all of the land to the south-west of the footpath corridor as indicated on the development concept plan, could be regarded as rounding-off and would not, in plan terms, have an adverse effect on the form and character of the settlement. Part of the housing development, however, would be to the north-east of the footpath and would seriously compromise the rural setting of the existing dwellings to the north, The existing dwellings would, in fact, become part of the enlarged settlement and would no would, therefore, extend beyond the limits of the development itself.
- 14. The converted barn is part two-storey/part single storey and has an east elevation about 15 metres long. It is a prominent and distinctive feature of the area that has retained its attractive features from the north boundary of the site and it has a maximum ridge height of about 8 metres from the north boundary of the site and it has a maximum ridge height of about 6 metres. The three dwellings to the west of the access road, given the restricted size of this part of the site, would be built to the south-east of the converted barn and would probably have ground dwellings would have ridge height. However, it was suggested at the inquiry that the proposed above that of the converted barn. Given also that they would be built in a tight group close to the north boundary and would be likely to have an urban character, the three dwellings to the west of the access road would seriously diminish the rural character of the converted barn.
- 15. The group of three dwellings referred to in the previous paragraph would also be conspicuous from footpath AX 16/29 and would be an intrusive feature in the rural landscape. The proposed three dwellings to the east of the access road would be separated from the other elements of the development by the access road and the footpath corridor, and would be situated even further out into the open countryside. Despite being at a slightly lower level, this group would be even more conspicuous and intrusive than that to the west. The proposed POS would children's play area and the extent of the field. This could be minimised by relocating the how it was maintained. Nevertheless, it is likely that a groomed character would replace the contribute to the overall intrusive nature of the proposed development.
- 16. The access road would pass close to the north gable of the farmhouse and between Small Acre and the converted barn. From Small Acre to the north boundary of the main part of the appeal site the access road would be about 90 metres long and would be situated at the edge of an open field. Such an extensive road in such a location would be an incongruous and alien planted to screen the road but it would take many years for this to become effective and the vegetation would be almost as incongruous as the road. Furthermore, vegetation would not access. The road, and the traffic associated with 25 dwellings, would be a particular intrusive, rural character of the landscape to the north of the appeal site.
- 17. Negotiating the stile at the beginning of footpath AX 16/8 is the point at which pedestrians currently pass from a distinct urban environment into an attractive open rural landscape that is only marginally diminished by the proximity of housing development on the south side of the

appeal site. The proposed development would modify this distinct change in character by creating a transition area where the footpath passes through the landscaped corridor. Given also that reaching a truly rural landscape would only be delayed by about 200 metres the modification of only a part of the footpath's character would not be significant. Similarly, views from the footpath over the valley towards Corporation Wood would only be slightly delayed and there are many opportunities within the footpath network from which to appreciate this changing panoramic scene.

- 18. Views towards the settlement, particularly from footpath AX 16/29 but also from footpaths further to the east, are of a rural landscape extending up to a dense built-up area that is contained by a distinctive boundary. Existing development on Park Road and Mulberry Road, though not particularly attractive, is primarily low-density semi-detached housing set back from the settlement boundary by at least 20 metres. Notwithstanding the POS, the proposed development would not 'soften' the hard edge of the settlement but would relocate it further out into the rural landscape. Furthermore, it is likely, given the extent of developed areas on the development concept plan and the proposed number of dwellings, that they would be sited much closer to what would effectively become the settlement boundary. Given also that the south-west corner of the appeal site is probably the highest point AOD in or immediately around the settlement, the entire proposed development would be prominent and intrusive, and would seriously detract from the character of Congresbury and the rural landscape to the east.
- 19. The proposed two groups of three dwellings either side of the access road would be particularly harmful to the character of the area and if this appeal were to be allowed a condition would be necessary to delete these from the development. The effect of this would be to lengthen the access road leading to the remainder of the development thus increasing its harmful effect on the landscape. Taking all factors into account, the proposed housing development and the access road leading to it would have a significant adverse effect on the character of Congresbury and the adjoining rural landscape. Furthermore, the imposition of a condition limiting the extent of the development would not diminish the harm that would be caused. The proposal thus conflicts with SP policies H.4 and C.7.

The second issue

- 20. The Appellants have referred to three appeals that were determined during 1999 relating to housing development sites in North Somerset. In all of the appeals a main consideration was one of housing land provision and in each case the Inspector concluded, contrary to the Council's view when considering the Local Plan Inspector's similar conclusion, that there was a significant shortfall in land provision to meet strategic obligations. Both main parties agree that since the start of the plan period 6,689 dwellings have been built out of a requirement of 10,450; the residual requirement therefore being 3,761 dwellings. At the inquiry the Council admitted that there is indeed a shortfall in housing land supply for the remainder of the emerging WLP plan period but disputed the Appellant's figures regarding the extent of the shortfall. Based on assessment of projected completions at A and B sites within the district, and taking into account allowances for small site completions and windfalls, the Appellants contend that the shortfall is about 1600 dwellings whereas the Council assert that the shortfall is only about 860 dwellings.
- 21. The Council's assessment makes no allowance for non-completions due to unforeseen circumstances, generally accepted to be 10%, which would raise their estimate of the shortfall to about 1000 dwellings for the plan period ending March 2001. Such a shortfall, amounting to about 9.5 % of the plan period requirement, is significant. The Council alluded to the fact that there is no specific requirement to apply a 10% allowance and suggested, given that the plan

period will end in about a year, that such an allowance is not appropriate. However, even if it were not to be applied, a shortfall of about 860 dwellings, which is about 8.2 % of the plan period requirement, is still significant. The Council has made considerable effort to assist developers in maximising completions at several of the A and B sites. These efforts, however, are unlikely to result in a substantial reduction in the identified shortfall.

- 22. Both main parties have also assessed the five-year housing land supply in North Somerset. This subject is complicated by various factors including the publication of the 2000 version of PPG3 and the JRSP's progress towards adoption outlined in paragraph 8 of this decision. Paragraph 76 of PPG3 states that "Effective monitoring is essential to the strategy of maintaining an adequate supply of land....advice on monitoring is contained in good practice guidance referenced at Annex D". However, the guidance has not yet been published and it is therefore unclear how the five year housing land supply should be assessed. Furthermore, with therefore unclear how the five year housing land supply should be assessed. Furthermore, with regard to the SP and the JRSP, there is uncertainty as to the strategic requirement (i.e. number of dwellings) to be used in any calculation. In any event, any assessment of the five-year housing land supply would not alter the fact that there is an identified shortfall in land provision.
 - 23. The Council contends that the proposed development at Park Farm, being for only 25 dwellings, is too small to make any significant impact on the shortfall and is unlikely to be completed within the plan period. The size of the development is not an important consideration and does not count against the proposal. The fact is that it would contribute to reducing the shortfall in land supply. At the inquiry the Appellants submitted a proposed build programme that indicates that the development would be completed by April 2001. Though November is certainly not the ideal month in which to commence building, given that the Council are likely to co-operate by expediting a reserved matters application and that the Appellant company has extensive resources, the build programme is achievable.
 - 24. Even if the development were delayed, for unforeseen reasons, it would contribute to housing land provision until such time as sites allocated through the local plan review process become available. In this regard, given also that the intended occupants of the proposed dwellings would have access to a primary level of community services, the proposal would accord with SP policy H.4. However, the site lies outside the Congresbury village fence and the proposal would thus be in conflict with LP policy WRA/H1.
 - 25. The WLP has yet to be adopted even though it is intended to cover the period up to April 2001, which is only about one year away, and does not reflect current government planning policy on housing provision. The WLP is therefore afforded little weight. The JRSP, on the other hand, despite the holding direction, is at an advanced stage in its progress towards adoption, is intended to cover the period up to 2011, and does reflect PPG3. The JRSP is therefore afforded considerable weight. PPG3, given that it was published only days before the inquiry, must be regarded as a very up to date expression of government policy on housing provision. The importance of the JRSP and PPG3 is magnified because they accord with each other. Furthermore, even if the Local Plan Inspector's recommendation had been accepted by the Council paragraph 38 of PPG3 states that "Where the planning application relates to development of a greenfield site allocated for housing in an adopted local plan or UDP, it should be assessed, and a decision made on the application, in the light of the policies set out in this guidance". One of the main thrusts of PPG3 is towards 'creating sustainable residential environments'. This objective is addressed by JRSP policy 2.
 - 26. JRSP policy 2, as proposed to be modified, seeks, in criterion (a), to concentrate development within and immediately adjacent to the main urban areas. Criterion (d) provides

that development which cannot be so accommodated nor on land that is already developed or committed to development, shall be steered to settlements that have significant existing advantages over other locations in respect of good public transport access. Criterion (d) also states that it is necessary to ensure that all new residential locations, amongst other things, offer good access to a range of local facilities and services, and enable a high proportion of journeys to be made by walking, cycling or public transport. Criterion (h) of JRSP policy 2 carries forward SP policy H.4 by seeking to protect the character of the countryside and its settlements by allowing limited development, within or adjoining settlements, that is appropriate to their character and accessible to local facilities and employment.

27. The appeal site is greenfield land and its use for housing development purposes would be directly contrary to the government's commitment to maximising the re-use of previously-developed land and buildings. Neither is the site within one of the main urban areas in North Somerset where government policy indicates that 'most additional housing development' should be concentrated. Congresbury is located in the Bristol to Weston-super-Mare A370 transport corridor and in the nearby village of Yatton there is a railway station that provides access to the two main employment centres of Bristol and Weston-super-Mare. However, the appeal site is about 0.9 kms from the A370 along which buses operate and at least 3 kms from Yatton station. It cannot, therefore, be claimed that the site has the benefit of good public transport access. Congresbury does have a range of local facilities and services to justify its inclusion in the WLP policy HOU/4 list. Nevertheless, the proposed development, given the criteria in PPG3 and JRSP policy 2, would not be a sustainable residential environment. This important matter weighs heavily against the fact that the development would accord with the SP.

Other matters

- 28. Park Farmhouse is a Grade II listed building. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard be paid to the desirability of preserving the setting of the listed building. The construction of the proposed housing development, and the means of access to it, would visually and actually separate the farmhouse from the previously associated farmland and would thus have a harmful effect on the setting of the listed building.
- 29. All other matters raised at the inquiry and in written representations have been taken into account including the WLP Inspectors recommendation that the appeal site be allocated for housing development, and the three 1999 appeal decisions. The WLP Inspector reached no conclusion on the effect of the proposal on the character of the area and, with reference to the emerging WLP process and the appeal decisions, the revised PPG3, which "introduces a new approach to planning for housing", had not been published at the time the decisions were made.

Conclusions

30. Though the proposed development would be contrary to LP policy WRA/H1 it would contribute to offsetting the shortfall in housing land provision for the emerging WLP plan period and would accord with SP policy H.4 in this respect. However, the development would not result in the creation of a sustainable residential environment and is thus in conflict with JRSP policy 2 and PPG3. Furthermore, and of such concern that it overrides all other considerations, the development would have a serious adverse effect on the character of Congresbury and the surrounding countryside. In this regard, the proposal conflicts with SP policy H.4. The proposed development is therefore contrary to the Development Plan, emerging Structure Plan policy and government guidance in PPG3.

31. For the reasons given I conclude that the appeal should not succeed and I shall exercise the powers transferred to me accordingly.

Gainnaire

John Braithwaite - Inspector

APPEARANCES

FOR THE APPELLANT:

Miss S Ornsby

Of Counsel, instructed by Mr M Johnson of Hoddell Associates

She called

Mr M B Johnson BA(Hons) BPhil

MRTPI

Director of Hoddell Associates, Development and Planning Consultants,

Tickton Lodge, 8 Bellevue Road, Clevedon, Bristol

Mr D McInemey BSc(Hons) MA(LD)

MLI

Associate Director of CPM, Environmental Planners, Akeman Barn, Coln St

Aldwyns, Cirencester

Mrs S Milward BA(Hons) BTP MRTPI

Planner at Bryant Homes Technical Services Ltd.

FOR THE LOCAL PLANNING AUTHORITY:

Mr P Wadsley

Of Counsel, instructed by the Solicitor to North Somerset Council

He called

Mr K Carlton BA DipLA MLI

Landscape Officer at North Somerset Council

Mrs M K Hoare MA MSc MRTPI

Planning and Transportation Policy Manager at North Somerset Council

INTERESTED PERSONS:

Mrs M Short

Chairwoman of Congresbury Parish Council

Mrs A Towler

Blackberry Barn, Park Farm, Congresbury

DOCUMENTS

Document 1 List of persons present at the inquiry on 14-16 March 2000.

Document 2 Letter of notification of the inquiry and list of persons notified.

Document 3 Appendices 1-10 to Mr Johnson's proof of evidence.

Document 4 Appendices 11-21 to Mr Johnson's proof of evidence.

Document 5 Appendices to Mr McInemey's proof of evidence.

APPEAL DECISION

Document	6	Appendices to Mrs Milward's proof of evidence.
Document	7	Appendices to Mr Carlton's proof of evidence.
Document	8	Appendices to Mrs Hoare's proof of evidence.
Document	9	Proof of evidence of Mrs Porter - Council witness not called at the inquiry.
Document	10	Supplementary statement by Mr Carlton.
Document	11	Supplementary proof of evidence by Mrs Hoare.
Document	12	Letter of representation by E G Sutton addressed to the Council.
Document	13	Congresbury village character statement.
Document	14	First page of a letter from Mr S Williams to Mr T King dated 19 January 2000.
Document	15	Proposed Build Programme.
Document	16	Copy of signed Section 106 Agreement.
Document	17	Report to Planning and Transport Committee on 15 March 2000.
Document	18	Council's Five Year Land Supply Calculation.
Document	19	Appellant's Revised (land supply) Tables.
Document	20	Letter from Crest Strategic Projects Limited to Mr N Edwards dated 10 March 2000.
Document	21	Summary Of Crest Letters (see document 20).
Document	22	Letter from C S J Planning Consultants Ltd to Mr D S Exley dated 15 March 2000.
Document	23	Progress towards Structure Plan Housing Requirements 1989-2001 and 1996-2011.
Document	24	Letter to C S J Planning Consultants Ltd from Mr D S Exley dated 10 March 2000.
Document	25	Information and plan relating to development at Pineapple Farm, Congresbury.
Document	26	Letter and enclosure from Mr D Rankin to Mr C R Mitchell dated 11 July 1994.
Document	27	Land Supply Tables produced by Mrs Hoare.
Document	28	Text of Ms Ornsby's opening statement.
Document	29	Supplementary statement by Mr Johnson regarding PPG3.
Document	30	Letter from The Barton Willmore Planning Partnership to Ms B Houldon dated 3 March 2000.
Document	31	Letter from Hoddell Associates to Ms B Houldon dated 21 February 2000.
Document	32	Letter from Hoddell Associates to Mr T King dated 9 March 2000.
Document	33	Letter and enclosures from Eversheds to GOSW dated 8 March 2000.
Document	34	Proposed Conditions.
Document	35	Notes of Mr Wadsley's closing submission.
Document	36	Letter to Colin Buchanan and Partners from GOSW dated 6 October 1999.
DLANC		

PLANS

Plan	Α	Location Plan – scale 1:2500 (application plan).

Plan B Site Survey.

Plan C Inset Map No 5 'Congresbury' from Woodspring Rural Areas Local Plan.

Plan D CPM drawing no. CPM1251/39a.