



NPA/20/023

## Dartmoor National Park Authority

2 October 2020

# Consultation Response: Planning for the Future UK Government White Paper August 2020

Report of the Head of Forward Planning and Economy

Recommendation: **That the Members endorse the key elements of the consultation response and delegate authority to approve the final response to the Chief Executive (NPO) in consultation with the Chair.**

## 1 Introduction

- 1.1 On the 6 August 2020 UK Government published a White Paper 'Planning for the Future'. Government states "The Planning for the future consultation proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed". The consultation ends on the 29 October 2020.
- 1.2 The scale of the proposed change to the planning system is significant, fundamentally altering the UK's approach to landuse planning established in the 1947 Town and Country Planning Act. Successive governments have sought changes to that system, the current government being no exception, with the abolition of regional planning, the introduction of the National Planning Policy Framework, Neighbourhood Planning, and a stream of Written Ministerial Statements and alterations to housing policy and Permitted Development Rights. Rightly, the government is now responding to the fact that the planning system has been altered and adjusted beyond recognition. The pace of recent change, including aspects such as affordable housing threshold, permitted development rights, and vacant building credit, leaves many communities confused and disenfranchised, and many local planning authorities frustrated at frequent centralised policy changes which undermine or remove opportunities for local influence.
- 1.3 The zonal approach proposed is one which operates successfully in Europe, and around the world. A key aim from the UK government being to speed up the plan-making and decision-making process, and provide a simpler and clearer system. In doing so it states that public participation in the planning process will be greater, and that the system will deliver better quality development in the places it is needed. Aims which are all commendable.

1.4 This paper introduces the key aspects of the consultation, focussing on those with the most relevance to Dartmoor. It also considers some broader points in respect of the overall impact of the proposed changes, and the extent to which the system will deliver for the National Park, and for our communities.

1.5 Officers have been engaged with broader debate around the White Paper and held meetings with the other English National Parks in order to inform a joint response through National Parks England (NPE).

## 2 Overview

2.1 The Prime Minister's Foreword in the White Paper indicates the gravity with which Government is approaching these sweeping reforms. The language within it is highly critical of the current planning system, and takes aim at planning for a number of national failures including the rate of house building, the time taken to prepare local plans, and the quality of the built environment.

2.2 The key aspects of the White Paper are:

- **Streamlining the planning process** "with more democracy taking place more effectively at the plan making stage"
- **Taking a radical, digital-first approach** "to modernise the planning process, moving from a process based on documents to a process driven by data"
- **Bringing a new focus on design and sustainability**
- **Improving infrastructure delivery** and ensuring developers play their part, through reform of developer contributions
- **Ensuring more land is available** "for homes and development that people and communities need"

2.3 The White Paper goes on to identify three 'Pillars' of reform:

- Pillar One: Planning for development
- Pillar Two: Planning for beautiful and sustainable places
- Pillar Three: Planning for infrastructure and connected places 60

2.4 The discussion and information within the White Paper is extensive and it's not appropriate to provide an overview of each aspect within this report, nor is it reasonable for this report to examine every aspect of the White Paper. Instead the following discussion aims to highlight key elements which Members might consider emphasising in a response to Government and concludes with a number of recommendations to shape that response.

## 3 Discussion

3.1 It is important to remember in analysing and formulating a response, that this is a White Paper, setting proposals for future legislation. The scope of the document is immense, and detail is understandably absent in most areas. This does present challenges in understanding the true implications of potential change. It is thus important to focus upon:

- what the reforms are seeking to do
- whether, with the information provided we consider they will achieve those aims
- the implications for the National Park and its communities
- the organisational implications in respect of resources and decision making
- the areas we would wish to engage with and influence as legislation and accompanying policy is developed

### 3.2 *The role of the planning system*

3.2.1 It is also important to take a step back from the specific aspects of the White Paper, to consider in the broadest possible sense why we have a planning system. The planning system exists to manage and control land use. For many years now it has sought to do so through the lens of sustainable development, considering the environmental, social and economic dimensions of decisions, in both a proactive and reactive way. The system exists to mediate and manage competing interests. It aims to act in the greater good; drawing on evidence, and considering people's views and interests in an open and democratic way. In doing so it should act neutrally and independently, not influenced by personal or financial interests. It seeks to address market failure, recognising where the market cannot or will not deliver, and intervention is needed to protect the environment, deliver infrastructure, or address social inequality or disadvantage.

### 3.3 *Affordable housing*

3.3.1 There are elements within the White Paper which might lead one to question the drivers of change in some areas. For example, the Secretary of State's stated desire to "...recreate an ownership society in which more people have the dignity and security of a home of their own". The inference that not owning a home is somehow undignified, and the realism of this aim in areas where supply, demand, and incomes may prevent that, is questionable. Arguably if renting a home is 'insecure' there is the need for government reform in this area here to promote the secure long-term rental culture which exists in much of Europe.

3.3.2 Furthermore the focus upon addressing housing affordability simply through increasing delivery is unlikely to achieve its aims. Indeed the current planning system has sought to achieve this, but has done so recognising that areas of constraint to development are also desirable areas to live, and that people with the means to afford homes in those areas will accelerate growth in house prices. The build-out rate is also a significant factor, and it is worth noting the recommendations of the Letwin Review which criticised 'homogenous' housing products across large sites which cannot be absorbed quickly enough by the market. This highlights the need for a complementary affordable housing strategy which addresses market failure where the 'build more' strategy simply is not appropriate. Government acknowledges this in the White Paper stating "National Parks are highly desirable and housing supply has not kept up with demand; however, the whole purpose of National Parks would be undermined by multiple large scale housing developments". However, this is in relation to calculating housing *requirement*, and not in relation to *delivering* or supporting appropriate solutions to affordable housing delivery in National Parks. The extent to which the three tier zonal approach, together with infrastructure levy changes and affordable housing models, will address delivery is an important aspect to examine as reforms progress.

### 3.4 *Links with other areas of policy and governance*

3.4.1 The extent of the reforms proposed, arguably draw into discussion other aspects of land management, the built environment, governance and decision making, which might be considered relevant, or even inherently linked with planning. For example Members will undoubtedly consider these reforms in the context of the Glover Review of Protected Landscapes, and governments anticipated response to this by the end of the year. Members will be mindful also of impending local government reform. Whilst we cannot 'second guess' other changes to come, it might be appropriate to highlight opportunities which we can identify for further reform, better integration of other complementary policy or management approaches. We may be particularly well placed as a National Park to take forward these opportunities.

3.4.2 In particular, it is proposed that a response should emphasise:

- The primacy of National Park purposes and the need to sustain due weight in the context of planning reform
- Climate Emergency response, and the desire for communities to see government and local government responding quickly and appropriately through reform which marks a step change in areas such as energy and transport, and the importance of linkages between planning and building control
- Rural proofing and a degree of recognition that a 'one size fits all' zonal approach will miss the many distinct challenges in rural areas across the country
- Environmental Land Management, in particular how the National Park can act as a recipient of Environmental Net Gain, and the role we may play organisationally in leading and operating that approach.
- The Glover Review of Protected Landscapes, and the need to ensure consistent government response which enables National Park Authorities to act in the ambitious and forward-thinking way identified in the Glover report.

3.4.3 Within the White Paper there is a commentary around Environmental Appraisal, and a recognition of the fact that this is a dimension of the planning system which can create delays and (in some cases) be limited in the value it adds. The need to address Environmental Appraisal is recognised, however there will be significant concerns that its replacement is a 'watering down' of environmental protection. In particular the Habitat Regulations Assessment process is a robust one, it can be time consuming, but exists to protect our most important habitats and species. There exists, within the reform of this area, and opportunity to deliver net gain, and maximise the environmental benefits of development whilst protecting our most important habitats and species. There are potentially ways in which the Environment Bill and future Planning Bill could align (for example, around Nature Recovery Areas, and Environmental Land Management) to create a more integrated approach.

### 3.5 *Plan-making and Engagement*

3.5.1 The ambition to shorten the plan-making process and the Local Plan itself is wholly welcome. The new map-based plans have the opportunity to be more engaging, though the need to then cross refer to national policies (which may be an extensive suite of policies) has the potential to be confusing and off-putting to the general

public, though potentially beneficial to agents or developers which operate over a wider area.

- 3.5.2 The emphasis on digital is welcome, and reflects much of what the Authority already does in respect of online consultation, and the Planning Alerts services. Importantly, appropriate resources will be needed to enable more interactive digital map-based Local Plans. Critically the emphasis ‘data’ needs to be embedded in appropriate and available evidence and data at the National Park level, something which we currently struggle with in a number of areas.
- 3.5.3 The White Paper states “Local councils [it is assumed to mean Local Planning Authorities] should radically and profoundly re-invent the ambition, depth and breadth with which they engage with communities as they consult on Local Plans”. Whilst it states the plans will ‘democratise’ the planning system, it would appear to have reduced opportunity to influence outcomes as a means of reducing the plan-making timescale, instead relying on a single frontloaded consultation on local plans, with comments then considered by the Planning Inspectorate alongside the draft Local Plan. This has the potential to disenfranchise communities, which frequently express concerns that Inspectors lack local knowledge, and are more than accustomed to commenting on development at an application stage. It is unclear what engagement at application stage would exist, though potentially it would only exist for development which is not consistent with the zoning/code and therefore needs a ‘traditional’ planning application.
- 3.5.4 The opportunities for community involvement through Neighbourhood Planning Groups to create design codes is welcome, though a significant step down in the devolution of planning to the local level. Many communities which are engaged with Neighbourhood Plans will face a significant task in embracing a new system with a focus almost purely upon design codes and ‘digital’ plan making. This is an area many planners will need to develop skills in, and an area conceivably far beyond the local voluntary skills and resources of many (particularly deprived) communities.

### 3.6 *Development Management and Design*

- 3.6.1 The White Paper proposes a zonal planning approach based upon three zones:
- Growth areas - automatic consent in the form of outline permission
  - Renewal areas - existing built areas for smaller scale development e.g. densification and infill, small sites in villages) – statutory presumption in favour of development.
  - Protected areas – areas with environmental and/or cultural characteristics. The Paper mentions Green Belts and AONBs but not National Parks, plus open countryside
- 3.6.2 Whilst the language might suggest so, it is important not to assume National Parks would comprise solely Protected Areas. Indeed as discussed above, the need to deliver affordable housing in our communities necessitates a proactive response potentially aligned with Renewal Areas in some parts of the National Park. Considering this in more detail, the White Papers states:

*“In areas where development is restricted (Protected areas) any development proposals would come forward as now through planning applications being made to*

*the local authority (except where they are subject to permitted development rights or development orders), and judged against policies set out in the National Planning Policy Framework.*

*We will consider the most effective means for neighbours and other interested parties to address any issues of concern where, under this system, the principle of development has been established leaving only detailed matters to be resolved.”*

- 3.6.3 This shouldn't be taken as 'business as usual' in National Parks though, as our ability to allocate land for housing, or have local development management policy may not exist. Instead, whilst decisions might be taken locally and less through the 'rule based' approach proposed for much of the system, there would be a design code rather than local policies, and the degree of engagement the public can have in that final decision is unclear.
- 3.6.4 It is worthwhile noting an emphasis on enforcement through the White Paper. This recognises the Development Management process moves to a system where clear rules are established in advance, development can take place in accordance with those rules, but where that is not the case there are appropriate powers to address non-compliance. There is the potential that design codes may lead to a broad range of interpretation and the ability to enforce these as 'rules' difficult.
- 3.6.5 Throughout the White Paper there is an expressed desire to 'build beautiful', which again has to be considered a positive aim of the reform, particularly in respect of volume housebuilders. However design professionals might consider this language at odds with the proposals to fast track "popular and replicable forms of development" and an emphasis on 'Pattern Books'. Such an approach relies heavily on design codes and the extent to which developers will seek to maximise the full scope of codes with varied design across sites, reflecting a market desire for design quality over size of homes, and value for money.. Whilst at a small scale the opportunity for innovation and variety would be very much welcome, the danger of a 'race to the bottom' in volume development to find the simplest and cheapest way to comply with design 'rules' would be concerning.

### 3.7 *Resources*

- 3.7.1 The White Paper states the "cost of operating the new planning system should be principally funded by the beneficiaries of planning gain". Government has previously explored a 'cost recovery' approach to development management (which was not found in favour). An approach which also funds plan-making would be a significantly higher burden upon the applicant.
- 3.7.2 It is clear that such significant changes to the roles of forward planning and development management officers, will require a range of new skills, and a potentially re-assignment of roles within planning departments across the country. The front-loading of the system places a greater emphasis on plan-making and engagement. The White Paper recognises a potential imbalance in resources where their level of development is likely to fall significantly short of drawing in the income necessary to resource a planning department. The drivers behind development must be clear, to achieve what is needed in the area, not to be set at a level necessary to fund a planning department. It is important this detail is addressed.

3.7.3 Of particular concern in this area is the proposal that successful appeals should have their fees refunded. As emphasised above the role of the planning system to guide appropriate decision by weighing relative merits of competing or conflicting issues. In a system where planning departments are dependent upon fee income for their existence, there is a significant danger that this influences decision making and creates a risk-averse 'approval' culture.

#### **4 Conclusion**

4.1 The table below outlines the main elements set out in the White Paper. It is important to recognise that at this stage there are a substantial number of 'unknowns', that in many areas require significantly more detail in order to truly understand the way they might operate, and their implications. This potentially provides an opportunity to influence these. At this stage, though, Members would be advised to 'flag' key points in our response (described in the conclusion, below), and seek to engage with emerging detail on an ongoing basis with Defra and MHCLG officials, as these elements are fleshed out, and a Planning Bill is prepared in 2021.

Issue	Implications	Potential response
<p><b>Local Plans to be replaced by new shorter interactive plans that are ‘rule based,’ backed up by design codes, with Development Management (DM) policies centralised</b></p>	<p>Largely ‘map based’ local plans have the opportunity to be shorter and quicker to prepare. The extent to which national DM policies only, could lead to policy voids, or dilute local distinctiveness is unclear.</p>	<p>Welcome the opportunity for reform, and the need for a shorter process in preparing local plans. Note that local policies play an important role in responding to specific local issues, and promoting local distinctiveness.</p>
<p><b>Plans will have a zoned approach with the route to development consent then depending on which zone a development will be in:</b></p> <ul style="list-style-type: none"> <li>- <b>Growth areas - automatic consent in the form of outline permission</b></li> <li>- <b>Renewal areas - existing built areas for smaller scale development e.g. densification and infill, small sites in villages) – statutory presumption in favour of development.</b></li> <li>- <b>Protected areas – areas with environmental and/or cultural characteristics. The Paper mentions Green Belts and AONBs but not National Parks, plus open countryside – planning permission as now but assessed against NPPF policy.</b></li> </ul>	<p>There is significant uncertainty in respect of National Park in this area, with some debate around whether NPs would be solely ‘protected areas’, and our ability to deliver if so. Alternatively the implications of ‘renewal areas’ in small villages are of concern.</p>	<p>There has been discussion with other National Parks around the extent to which a three tier approach is fit for purpose, and that perhaps an additional area(s) is needed to allow appropriate rural change.</p>



Issue	Implications	Potential response
<p><b>Consultation to be ‘frontloaded’ and shifted to this plan making stage, using digital consultation methods</b></p>	<p>The proposal are significantly frontloaded, with limited opportunity for LPAs to respond to consultation views, instead potentially putting a significant onus upon the Planning Inspectorate to amend submit plans on the basis of public comments.</p> <p>It is anticipated there will be significant public concern at the inability to comment at application stage.</p>	<p>A general response stressing the importance of community engagement in a way which genuinely influences changes in plan-making at the local level.</p>
<p><b>Plans will be subject to a single statutory “sustainable development” test – the existing tests of soundness, and the Duty to Cooperate to be abolished</b></p>	<p>It will be important that there is a mechanism for higher level planning to support growth and infrastructure, and large-scale change. Cross-boundary conversations are critical to protect the settings and impacts upon protected landscapes.</p>	<p>Welcome the simpler test. Highlight the importance of cross-boundary co-operation (though potentially noting that the Duty to Co-operate brought in to replace regional planning has not been efficient and effective).</p>
<p><b>Plans will be subject to a statutory (enforceable) timetable of 30 months with a single public consultation</b></p>	<p>It is unclear how it would be enforceable. The timetable is tight but the ambition is good, subject to appropriate resourcing. Important of the availability of evidence and a NP level to inform plan-making, and that consultation is not the ‘weak link’ getting squeezed in a tight timetable.</p>	<p>Note the importance of appropriate evidence at a National Park level. Applaud the ambition to accelerate plan-making, but stress the importance of appropriate time for genuine engagement in the process.</p>
<p><b>There will be a new nationally binding housing requirement set that will take into account affordability and planning constraints – including for the first time in National Parks</b></p>	<p>There is a significant lack of detail in this area. Some emerging models have suggested significant uplift in housing number (including in south Devon) and the extent to which the model does factor in constraints will be fundamental to NP protection, and meeting local affordable needs.</p>	<p>Express concern at the role for a national model in driving spatial housing growth, which is currently what the system itself is for. Weaknesses or failures in the model, could lead to under or over delivery with immense consequences for local communities and/or the environment if this fails.</p>

Issue	Implications	Potential response
<b>Section 106 and Community Infrastructure Levy will be replaced by an 'Infrastructure Levy'</b>	The extent to which local values and viability will be factored in is unclear. A national 'one size fits all' model has the potential to have significant winners and losers at either end of the spectrum.	Welcome the need for a clearer approach, but stress the importance of the need to set or adjust locally, or it risks magnifying social inequality.
<b>There is to be more emphasis on enforcement of planning standards and decisions</b>	Welcome, provided it has the 'teeth' to act of inappropriate development. Needs to be appropriately resourced.	Welcomed, though important that inappropriate development is not allowed at that the new system is seen to be robust.
<b>Each planning authority should appoint a chief officer for design and place making</b>	There's a potential mismatch between the 'building beautiful' agenda, and the push for pattern books, design codes, and PD rights for development which is 'replicable'	Welcome the governments push for high quality design, note the importance of integration with energy efficiency, and express concern that it could suppress opportunities for innovation, and with housebuilder could exacerbate the 'pattern book' model of estate development.
<b>Changes proposed around Conservation Areas and Listed Building regime, in relation to changes to address climate change</b>	It is unclear how far government might go here. It is ultimately welcome, though a 'one size fits all' approach could lead to degradation of the quality of buildings or conservations areas.	Welcome the fact that government is addressing the issues of building conservation in light of the climate emergency, and note the importance of this being a balanced and appropriate response.
<b>The cost of operating the new planning system should be principally funded by the beneficiaries of planning gain – landowners and developers – rather than the national or local taxpayer. This will include allocating some 'gain' for local plan work Planning fees would be refunded if deadlines are not met or where an appeal is successful</b>	There is there potential for significant imbalance here with areas with small amounts of development being under-resourced. There are fundamental principles here around the role of the planning system in addressing inequality, and the transparency and influence of the decision-making process. Having resource implication effectively form part of a planning decision as a potential 'deterrent' to refusal is very concerning.	Stress the importance of an appropriately resourced planning system. Highlight the extent to which the publics faith in the planning system is dependent upon transparency, and independence in decision making.

- 4.2 On the basis of the discussion above, it is proposed that a response to the White Paper draws on the following key elements:
1. That DNPA **welcomes the opportunity for planning reform** and the drive for a simpler and faster approach to plan-making and decision-making, and a clear approach to infrastructure funding.
  2. That as a Local Planning Authority, we would emphasise the need for a planning system which enables intervention where it is needed to **address social inequalities, this is particular the case in rural areas, and national parks**, where solutions are needed to address specific local issues.
  3. That simplification in the process of environment appraisal are welcome, but we would stress **importance of environment protection**, and sustained **complementary environment policy and legislation** which protects our most important habitats, species and landscape
  4. That future legislation and policy must respond to a need for an approach to **affordable housing** which recognises that it is not appropriate nor possible to 'build' out of an affordable housing problem in National Parks
  5. That we agree the Duty to Co-operate process is not fit for purpose, but would stress the importance of a framework for **broader strategic planning**, which enables binding housing targets to be met in the most appropriate places, and avoids recognises the importance of the '**Section 62 Duty**' to avoid a development 'cliff edge' around protected landscapes
  6. The need for a much **clearer emphasis on climate change**, and how energy and transport, and integration with building control, are fundamental to addressing the climate emergency.
  7. That the recognition of the **importance of historic buildings** and conservation areas in climate change is important to allow for improvements and efficiency, but that this must continue to recognise the importance of our finite heritage asset resource.
  8. That National Parks are in a unique position to drive **Environmental Net Gain**, working across broader areas to maximise the potential of protected landscapes
  9. That the reform should take the opportunity to align with and deliver governments response to the **Glover Review**, in particular ensuring National Park Authorities have the tools to be efficient, innovative and forward-thinking environmental organisations
  10. That DNPA consider **engagement** a key part of the planning decision-making process, and that the public should be able to genuinely influence outcomes and reducing the number of occasions in which the public can engage should not be used as a short-cut to speeding up the process.
  11. The **importance of design quality in protected landscapes**, and concern that extended Permitted Development Rights and 'Pattern Book' design can lead to the mediocre development we all seek to avoid
  12. The importance of an **appropriately resourced planning system**, that remains independent of financial influence in decision-making

- 4.3 It is proposed that the above 12 points form the basis of DNPA's response. Importantly, it should be recognised that this is the beginning of the process of planning reform, and, recognising the high level nature of the White Paper, it will be importantly to engage continuously with government with as relevant legislation and policy is formulated.

## **5 Financial Implications**

- 5.1 The potential financial implication of the White Paper are extensive but unknown at this point. They will be considered as legislation and policy emerges. This response has no direct financial implications.

DAN JANOTA



NPA/20/024

## Dartmoor National Park Authority

2 October 2020

# Tree Preservation Orders, Section 211 Notifications (Works to Trees in Conservation Areas) and Hedgerow Removal Notices Determined Under Delegated Powers

Report of the Trees and Landscape Officer

Recommendation: **That the decisions be noted.**

### TPO APPLICATIONS

#### Teignbridge

**Ref: 19/0079**

**Trapstile, Lustleigh**

**SX 7832 8138**

Application to reduce long lateral branches on an oak tree. The works will have minimal impact on the health or appearance of the tree. Consent was granted subject to conditions:

1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
2. All works are carried out in accordance with British Standard 3998:2010 Tree Work-Recommendations.

#### West Devon

**Ref: 19/0080**

**Holly Manor, Yelverton**

**SX 5207 6810**

Application to reduce the height of a row of cypress trees. The trees have sharp leader forks and the works will prevent tree failure. Consent was granted subject to conditions:

1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
2. All works are carried out in accordance with British Standard 3998:2010 Tree Work-Recommendations.

**Ref: 19/0081**

**Okehampton Castle**

**SX 5827 9429**

Application to fell 15 oak and 5 beech trees. The trees are in very poor condition or are infected with honey fungus. Consent was granted subject to conditions:

1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
2. Replacement planting of 20 oak and/or beech trees within the crown spread of the originals during the first season following felling.

**Ref: 20/0004**

**Hedges, Yelverton**

**SX 5827 9429**

Application to reduce an ash tree. The tree is infected with Ash Die Back and the works are an attempt to reduce the level of infection Consent was granted subject to conditions:

1. Five working days' notice to be given to the Authority prior to the commencement of approved works.
2. All works are carried out in accordance with British Standard 3998:2010 Tree Work-Recommendations.

## **SECTION 211 NOTICES**

### **Teignbridge**

**Ref: 20/0001**

**Sunnymount, Lustleigh**

**SX 7848 8133**

Notification to fell a Norway spruce. The tree has poor form and minimal public amenity value

A Tree Preservation Order has not been made.

**Ref: 19/0062**

**Souther Wreyland**

**SX 7879 8114**

Notification to fell two birch trees. The trees are in good health, but the Parish Council do not support protecting the trees with a TPO.

A Tree Preservation Order has not been made.

**Ref: 19/0003**

**Millenium Green, Buckfastleigh**

**SX 7421 6612**

Notification to reduce a willow and Tree of Heaven. The trees were damaged in recent winds and the works will prevent further branch failure

A Tree Preservation Order has not been made.

### **West Devon**

**Ref: 19/0078**

**Cranley Gardens, Chagford**

**SX 7003 8765**

Notification to fell a sumac. The tree is in very poor condition.

A Tree Preservation Order has not been made.

**South Hams**

**Ref: 19/0082**

**25 Church Street, South Brent**

**SX 6968 6009**

Notification to fell a cypress tree and prune three apple trees. The trees are hidden from public view and the works will have minimal impact on the character of the Conservation Area.

A Tree Preservation Order has not been made.

**BRIAN BEASLEY**