# STATEMENT OF CASE

Outline planning application for a new Category B prison and associated ancillary facilities

Land to the South of HMP Gartree, Market Harborough.

May 2022

LPA Ref: 21/01600/OUT

Appeal on behalf of Ministry of Justice



### CONTENTS

1.	INTRODUCTION	.3		
2.	THE APPEAL SITE	5		
3.	THE PROPOSED DEVELOPMENT	6		
4.	PLANNING POLICY AND GUIDANCE	8		
5.	THE APPELLANT'S CASE	1		
6.	LIST OF DOCUMENTS TO WHICH THE APPELLANT MAY REFER	6		
APPENDIX 1 – APPLICATION DRAWING AND DOCUMENT SCHEDULE				

### 1. Introduction

- 1.1 This Statement of Case has been prepared by Cushman & Wakefield in relation to an appeal by the Ministry of Justice ('the Appellant'). It outlines the main points of the Appellant's case in accordance with the Town and Country Planning (Inquiries Procedure) (England) Rules 2000 as amended.
- 1.2 The appeal is made following the refusal of planning permission (ref. 21/01600/OUT) by Harborough District Council ('the Council') for the following description of development:

Outline Planning Application with all matters reserved except for means of access and scale for the construction of a new Category B prison of up to 82,555sqm GEA within a secure perimeter fence together with access, parking, landscaping and associated engineering works, Land Adj HM Prison, Welland Avenue, Gartree.

1.3 The Site comprises land to the south of HMP Gartree Category B men's prison. The Site comprises three land parcels (see Figure 1, below). Parcel 1 comprises farmland to the south of Welland Avenue, Parcel 2 is open space to the north of Welland Avenue and Parcel 3 is an area of open space which has been identified as having potential for amenity/play space for the Gartree estate. The Site is accessed via a farm (track) from Welland Avenue.



**Figure 1: Site Location** 

- 1.4 The Site and adjacent prison are situated on land which was formerly part of RAF Market Harborough.
- 1.5 As detailed within section 5 of this report, the Appellant's case is that the proposals accord with the Development Plan. The proposed development is therefore acceptable in principle and will not lead to any other significant adverse impacts that would outweigh the benefits of the scheme. The appeal should therefore be allowed.
- 1.6 This statement is structured under the following sections:
  - Section 1 Introduction;
  - Section 2 The Appeal Site;

- Section 3 The Proposed Development;
- Section 4 Planning Policy and Guidance;
- Section 5 The Appellant's Case; and
- Section 6 List of Documents to which the Appellant may refer.
- 1.7 The case for the Appellant will address all matters left outstanding at the point the application was determined. The Statement of Case addresses the Council's reason for refusal and summarises the evidence that will be produced in support of the Appellant's case. The Appellant reserves the right to adduce further plans and documentation where relevant.
- 1.8 The Appellant reserves the right to refer to any further evidence in support of the appeal including matters that arise from the process of agreeing common ground or other issues raised during the course of the appeal that are not covered directly by this Statement.

### 2. The Appeal Site

### Site Description

- 2.1 The Site and surrounding area are described in the submitted Planning Statement and it is anticipated that this will be a matter agreed within the Statement of Common Ground (SoCG).
- 2.2 The SoCG will set out a full description of the Site including its relationship with the surrounding area, adjacent existing prison, nearby residential estate and transport network.

### **Planning History**

- 2.3 The SoCG will set out the planning history relevant to the Site, including the adjacent prison.
- 2.4 The Appellant will also provide details of the pre-application discussions held with Council Officers and the feedback received.
- 2.5 Details of the Appellant's engagement with the local community will also be provided.

### 3. The Proposed Development

**Proposed Development** 

3.1 The Application seeks planning permission for:

Outline Planning Application with all matters reserved except for means of access and scale for the construction of a new Category B prison of up to 82,555sqm GEA within a secure perimeter fence together with access, parking, landscaping and associated engineering works, Land Adj HM Prison, Welland Avenue, Gartree.

- 3.2 The indicative site layout proposes a range of buildings and facilities typical of a Category B Training Prison, including:
  - Seven new houseblocks each accommodating up to 245 prisoners (1,715 prisoners in total), totalling c.53,122 sqm GEA
  - Supporting development including kitchen, workshops, kennels, entrance resource hub, central services Hub and support buildings, totalling c. 29,433 sqm GEA
  - Ancillary development including car parking (c. 523 spaces), internal road layout and perimeter fencing totalling 1,463 linear metres enclosing a secure perimeter area of 11.69 ha.
  - The house blocks will be four storeys in height, whilst the other buildings will range from one to three storeys.
- 3.3 Other development proposed includes kennels, polytunnels, car parking (c. 523 spaces), internal road layout and perimeter fencing. A bicycle shelter is also proposed.
- 3.4 A detailed description of the proposed development and each of the proposed elements is contained within the submitted Planning Statement. It is anticipated that this will be a matter of agreement with the Council in the SoCG.

### Application Submission and Determination

- 3.5 The application was submitted and registered as valid on the 20<sup>th</sup> September 2021. It was provided with reference number 21/01600/OUT.
- 3.6 A formal EIA screening exercise has been undertaken with the LPA to confirm that the development proposal does not require an EIA to be undertaken to support the application. The screening request was submitted on 9<sup>th</sup> December 2020. The Council issued its decision 8<sup>th</sup> February 2021 confirming that the scheme did not comprise EIA development.
- 3.7 The application was supported by a suite of documents and plans, with additional material submitted to the Council during the determination period. **Appendix 1** lists the submitted documents and drawings, noting their date of submission.
- 3.8 The application was heard at the Council's Planning Committee on 5<sup>th</sup> April 2022 with the Officer's report (OR) providing a recommendation for approval subject to completion of a legal agreement under Section 106 of the Town and Country Planning Act 1990 ('the 1990 Act').
- 3.9 The committee determined to refuse the application contrary to the officer recommendation. The decision notice was issued on 7<sup>th</sup> April 2022.
- 3.10 The application was refused for the following reason:
  - 1. The proposed development is unsustainable by virtue of its location and by virtue of its size,

scale and design would have a harmful impact on the character and appearance of the countryside and Area of Separation. The benefits associated with the proposed development would not outweigh this harm and the proposal is therefore contrary to Harborough Local Plan policies GD1 & GD3 and Lubenham Neighbourhood Plan policies LNP01, LNP16 and LNP19.

### **Planning Obligations and Conditions**

- 3.11 A Section 106 Legal Agreement under the 1990 Act is required to secure the necessary planning obligations. The contributions set out below are considered to meet the tests contained at paragraph 57 of the National Planning Policy Framework ('the Framework') and as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.
- 3.12 It is anticipated that the S106 Agreement will cover the following items:
  - Contribution of £102,898 for improvement works to footpath A22.
  - Construction traffic routing arrangements;
  - Social Value (local labour);
  - Community Engagement
  - Appraisal and monitoring of the Travel Plan;
  - Monitoring of the Biodiversity Net Gain, and;
  - Public Transport Contribution.
- 3.13 A Draft Section 106 Legal Agreement will be submitted and discussed through the course of the appeal. A final agreed S106 agreement will be submitted before the start of the Inquiry.
- 3.14 Additional highway works were identified by LCC as potential benefits to the neighbouring villages of Foxton and Lubenham. These highways works are not a requirement of the planning application and are not advanced through the appeal process since they are not necessary to make the development acceptable in highways terms.
- 3.15 A draft schedule of conditions was included in the Officer Report and had been subject to discussion with the Council prior to the Planning Committee. It is anticipated that the SoCG will contain the agreed schedule of planning conditions for the Inspector's consideration.

### 4. Planning Policy and Guidance

4.1 Section 38 of the Planning and Compensation Act 2004 sets out that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.

### The Adopted Development Plan

- 4.2 Reference will be made to the development plan for Harborough District Council which comprises the following documents:
  - Harborough Local Plan 2011-2031(HLP) (2019).
  - Lubenham Neighbourhood Development Plan (LNDP) (2017).
- 4.3 The Local Plan proposals map shows that HMP Gartree and the Site are within the open countryside (but not within the Green Belt). Land Parcel 2 and Land Parcel 3 (see Figure 1 p3) are allocated for open space under Policy GI2. The application is partly with the Lubenham and Gartree Area of Separation as defined in the LNDP Policy LNP01.
- 4.4 The key policies are as follows, with further policy detail added for the most relevant policies:

### Harborough Local Plan

- Policy GD3: Development in the Countryside. The policy defines the types of development which are acceptable in the Countryside.
- Policy GD1: reiterates paragraph 11 of the National Planning Policy Framework ("The Framework") in respect of sustainable development.
- Policy SSI: Settlement Hierarchy.
- Policy Gl2 states that the district's open space, sport and recreational facilities will be safeguarded and enhanced through improvements to their quality and use. Development which would result in the loss or reduction of defined open space, will not be permitted.
- Policy GD5: states that development should be located and designed in such a way that it is sensitive to its landscape settling and character.
- Policy GD8: states that development will be permitted where it achieves a high standard of design including meeting key criteria.
- Policy HC1: Heritage Assets and their settings.
- Policy CC1: Mitigating climate change.
- Policy CC3: Flood Risk.
- Policy CC4: Sustainable Drainage Systems.
- Policy IN2: Existing Transport Facilities.
- Policy GI15: Protected Species.

#### Lubenham Neighbourhood Development Plan

 Policy LNP01: Lubenham and Gartree Area of Separation. Development within this areas will not be permitted if it would diminish the visual separation between Lubenham and Gartree.

- Policy LNP16: Proposals for new business/employment development.
- Policy LNP19: Limited and small-scale employment/business development within Gartree.

#### **Other Material Considerations**

#### National Planning Policy Framework and Guidance

- 4.5 The Framework (2021) is a material consideration in the decision making process. Reference will be made to this document, the associated Planning Practice Guidance (PPG) and any succession documents.
- 4.6 Paragraph 8 sets out three overarching objectives to achieving sustainable development:
  - An economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
  - A social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
  - An environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 4.7 Paragraph 11 of the Framework sets out the presumption in favour of sustainable development and establishes that for decision-taking, this means approving development proposals that accord with an up-to-date development plan, or where there are no relevant development plan policies, granting permission unless the application of policies in the Framework provide a clear reason for refusal.
- 4.8 Paragraph 81 places significant weight on the need to support economic growth and productivity, with paragraph 82 setting out objectives to support economic development.
- 4.9 Paragraph 96 states that local planning authorities should work proactively and positively to plan for public service infrastructure, such as criminal justice accommodation, and resolve key planning issues before submission. This is to ensure the faster delivery of public service infrastructure.
- 4.10 Paragraph 106(a) of the Framework states that planning policies should support an appropriate mix of uses across an area, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- 4.11 Paragraph 107 of the Framework outlines that parking standards for residential and nonresidential development should consider the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public transport, local car ownership levels; and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 4.12 Paragraph 110 of the Framework sets out the highway matters that should be considered in assessing development proposals, with paragraph 111 going on to state that development should only be refused on highways grounds if there would be an unacceptable impact on

highway safety, or the residual cumulative impacts on the road network would be severe.

- 4.13 Paragraph 119 of the Framework states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.14 Paragraph 127 of the Framework states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.15 Paragraph 130 of the Framework states that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion and resilience.
- 4.16 Paragraph 161 of the Framework states that Local Planning Authorities should apply a sequential risk based approach to the location of development taking into account all sources of flood risk and the current and future impacts of climate change.
- 4.17 Paragraph 174 of the Framework states that planning policies and decisions should contribute to and enhance the natural and local environment by (inter-alia) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 4.18 Paragraph 194 of the Framework states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

### 5. The Appellant's Case

This section sets out the Appellant's position in relation to the reason for refusal.

The proposed development is unsustainable by virtue of its location and by virtue of its size, scale and design would have a harmful impact on the character and appearance of the countryside and Area of Separation. The benefits associated with the proposed development would not outweigh this harm and the proposal is therefore contrary to Harborough Local Plan policies GD1 & GD3 and Lubenham Neighbourhood Plan policies LNP01, LNP16 and LNP19.

### **Open Countryside**

- 5.1 The application site is within the open countryside (but is not within the Green Belt). HLP Policy GD3 identifies acceptable uses within the open countryside which does not include the proposed use. There is accordingly a degree of conflict with HLP Policy GD3.
- 5.2 Section 8 of the Planning Statement considers the extent to which the proposals may cause harm to the open countryside and concludes that whilst the proposals are not in accordance with HLP Policy GD3, the need for and wider benefits of the proposals will outweigh any perceived harm. This is also referenced within paragraph 7.18 of the Officer Report.
- 5.3 The need for the new prison is identified within Section 7 of the Planning Statement and summarised at Sections 5.5-5.10 of this Statement of Case. The pressing national need for new prison spaces is a compelling reason for permitting development in this location.
- 5.4 The key benefits of the proposals are identified within Sections 8 and 9 of the Planning Statement and are summarised below:

#### Economic:

- 76 net FTE jobs during the construction period.
- Estimated £72.8 million GVA (net) during the construction period, with an additional £21.8 million indirect and induced GVA (gross).
- 778 FTE jobs created during the operational stage, with approximately 737 employees likely to reside locally.
- The operational spend of the prison will amount to £13.7 million, with £2.7 million being retained locally supporting 276 jobs at a regional level.
- The operational regional supply chain spend will equate to £17.5 million per annum.
- Expenditure from prison staff and visitors within the local and regional economy will equate to £12.1 million per annum, supporting 236 jobs.

#### Social:

- Delivering new prison places to meet an identified need, in the right geographical location;
- Providing safe, secure and modern facilities to deliver improved outcomes for prisoners and reduce reoffending rates;
- Local apprenticeship, training and supply chain opportunities will be created throughout the construction and operational stages of the development.
- The appointed contractor will be contractually obliged to meet key performance targets including: a 25% local spend within 25 miles of the Site; £50,000 spend with voluntary, community and social enterprises; and at least 1 community project per year.

### Environmental:

- The proposed development will make efficient use of land.
- The design approach has ensured that the impact of the proposals have minimised landscape visual impact the remaining landscape and visual effects are not considered to be significant.
- Delivery of a high-quality sustainable prison that will achieve BREEAM Excellent, with endeavours to achieve BREEAM 'Outstanding'.
- The Site is not subject to, nor closely located to, any sensitive ecological designations. Impact to protected species has been avoided so far as possible, with suitable mitigation proposed where required.
- At least 10% biodiversity net gain will be achieved with no offsetting required.
- High fabric energy efficiency, air source heat pumps, photovoltaic panels and energy efficient lighting, appliances, and equipment will be specified to assist in achieving the MoJ's target to be net zero carbon ready.
- The Site is not at risk of flooding and will not lead to an increase in the risk of flooding elsewhere. The proposed drainage strategy is in accordance with the drainage hierarchy.
- 10% (53) of the car parking spaces will be set aside for electric vehicle charging points.
- A further 5% (27) will be set aside for car sharing users.
- 51 covered cycle parking spaces will be provided.
- Construction method will make use of modern methods of construction, with associated quicker construction times, lower energy use and stronger green footprint.
- Retention and improvement of allocated areas of open space in the Local Plan (Land Parcels 2 and 3).

### Significant National Need for new Category B prison places.

- 5.5 The Prison Act 1952 grants power to the Secretary of State for Justice to provide and maintain prison accommodation and to lawfully hold within it prisoners sentenced to imprisonment or committed to prison on remand or pending trial.
- 5.6 The prison population is forecast to rise significantly during the 2020s, putting sustained pressure on the custodial estate. The rate of police recruitment and their subsequent focus, along with reforms to the Criminal Justice System is forecast to lead to significantly more arrests, charges and sentences and a similarly significant increase in demand for prison places well beyond existing capacity.
- 5.7 The projected demand will soon outstrip supply and the Government needs to ensure there is sufficient capacity to respond to this. Previous governments have run out of prison places. In 2007 there was an instance of this leading to prisoners being released before the end of their sentences. This reduced HMPPS's ability to protect the public from offenders and harmed public confidence in the criminal justice system.
- 5.8 This challenging demand profile will be exacerbated by the rate of court recovery dealing with the increase in backlog of cases from the Covid-19 pandemic; an increase in Crown Court capacity over the next few years to drive down the backlog of cases will drive a further increase in demand for prison places as there is more capacity to hear more cases, and more prisoners enter the system.

- 5.9 It is therefore of critical importance that additional prison places are provided at speed to meet demand.
- 5.10 The proposed development will therefore assist in meeting a significant national need for new prison places, specifically Category B, and this benefit should be afforded very substantial weight in favour of the proposed development.
- 5.11 The reason for refusal sets out that the benefits identified as part of the planning application do not outweigh the non-compliance with HLP Policy GD3.
- 5.12 The Appellant's position is that the need for the new prison and the wider benefits that the scheme will deliver clearly outweigh any harm to justify the grant of permission for the appeal scheme, contrary to the reason for refusal set out on the decision notice.

### Area of Separation

- 5.13 The Site is partly within the Area of Separation between Gartree and Lubenham defined in LNDP Policy LNP01.
- 5.14 Although partly within the Area of Separation, the proposed development will maintain a significant distance between the two settlements and will not compromise any existing gaps. A Landscape Visual Impact Assessment (LVIA) was prepared and submitted with the planning application. This document assessed the size, scale and impact of the proposals on the character and appearance of the area and included appropriate mitigation.
- 5.15 It is considered that the impacts to local receptors are acceptable and sufficient mitigation is delivered through the proposals set out in the landscape strategy. The proposed development is therefore considered to meet the requirements of LNDP Policies LNP01 and LNP16.

### **Rural Location**

- 5.16 The Site is in a rural location adjacent to the existing HMP Gartree Prison. Whilst the Site is within a rural location, it does not follow necessarily that it is an unsustainable location. The NPPF makes clear that development proposals should seek to maximise sustainable transport solutions noting that such opportunities vary between urban and rural areas. Benefits including a £500K public transport contribution<sup>1</sup> have been identified within the planning application to improve existing public transport connections. Similarly, funds have been identified through consultation with LCC Highways department to improve the pedestrian route (route A22) between Foxton Village and Foxton Primary School.
- 5.17 The proposals also have wider sustainability benefits as detailed at Section 8.56 to 8.72 of the Planning Statement. It is therefore considered that the proposals do accord with HLP Policy GD1.
- 5.18 LNDP Policy LNP19<sup>2</sup> identifies the type of small scale employment/business development deemed to be acceptable within the Gartree area, defined in the accompanying policy text as the Gartree Estate. This policy would therefore not appear to be relevant to the proposed scheme which is situated on land adjacent to HMP Gartree (outwith the Gartree Estate). Even if this policy was deemed to include the Site, the policy text relates to small scale employment and business development but does not necessarily preclude larger scale employment

<sup>&</sup>lt;sup>1</sup> To be included in the draft Section Ch Legal Agreement

<sup>&</sup>lt;sup>2</sup> Referenced in the reason for refusal

development which is addressed in a separate LNDP Policy (Policy LNP16). The appellant will seek to clarify this point with the Council as part of the Statement of Common Ground.

### Responses to the Planning Application

- 5.19 The Officer Report identifies the statutory and non-statutory consultees consulted about the application. The majority of these did not object to the proposed development, notably including Leicestershire County Council Highway Services, the Environmental Health Officer, Landscape Officer, Natural England and LCC Ecology Officer.
- 5.20 The appeal proposal attracted a number of objections from local residents on a range of issues including but not limited to the principle of development; visual impact; design; highways; noise; crime and safety; overlooking; ecology; and impact of construction. These comments are again suitably summarised within the Officer Report and Officer Report Addendum.
- 5.21 Where relevant and necessary, the Appellant will provide evidence to address the concerns raised by third parties.

### **Overall Planning Balance**

- 5.22 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications shall be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.23 The Appellant will demonstrate that the appeal scheme is in accordance with the development plan when read as a whole. Relevant policies for the determination of the appeal are complied with, including but not limited to HDC Policies GD1 (Sustainable Development), GD5 (Landscape Setting), GD8 (Design), CC1 (Climate Change), GI15 (biodiversity and habitats) and GI12 (Open space) and LNDP Policies LNP01 and LNP16.
- 5.24 The Framework is acknowledged as a relevant material consideration, specifically with regards to paragraph 96 which supports the delivery of new prison infrastructure through collaborative working between local planning authorities and delivery partners and statutory bodies.
- 5.25 The appeal proposal constitutes sustainable development and contributes positively towards the three dimensions of sustainable development economic, social and environmental as summarised in Section 9 of the Planning Statement.
- 5.26 The Appellant will show that there are no adverse impacts that cannot be appropriately mitigated.
- 5.27 In accordance with paragraph 11c) of the Framework it is considered that approval for the proposal should be granted as it is in accordance with the Development Plan. If, contrary to that case, it is concluded that the proposal is contrary to the development plan then there are compelling material considerations, most notably the pressing national need for prison places, which justify the grant of planning permission.
- 5.28 The case for the Appellant and the evidence submitted will show that the planning balance is in favour of planning permission being granted for the appeal proposal as it represents a sustainable form of development and will deliver substantial benefits.
- 5.29 The Appellant will adduce evidence from experts in at least the following areas of expertise:-
  - Planning, including policy and planning balance;
  - Need;

- Socio-economic benefits; and
- Landscape and Visual Impact
- 5.30 The Appellant reserves the right to make changes to the Appellant's case to respond to the publication of relevant material following the submission of this Statement of Case.

### 6. List of Documents to which the Appellant may refer

- 6.1 At the inquiry the Appellant will rely on the following documentation. The Appellant also reserves the right to add to this list should other documentation become relevant up to the appeal inquiry.
  - All documentation submitted with the application, including the additional information submitted in response to consultation responses;
  - All relevant correspondence between the Council and other relevant parties prior to the submission of the application and during the determination period including meeting notes, emails and any other relevant documentation;
  - The decision notice, Officer Report and other documentation relevant to the Site;
  - All documentation to be submitted on behalf of the Appellant's expert witnesses;
  - Additional documentation prepared in the light of matters raised in the Council's Statement of Case, discussions with, or evidence submitted by others;
  - Central Government guidance in the form of primary legislation, secondary legislation, Circulars, Ministerial Statements, National Planning Policy and Guidance and any other relevant publications including but not limited to consultation papers, letters, advice, or as may become relevant;
  - Adopted and emerging development plan policies including any supporting evidence including technical papers and supporting background documents, or as may become relevant, and;
  - Relevant Case law.

## Appendix 1 – Application Drawing and Document Schedule

Plan	Reference	Date Submitted
Site Location Plan	661277-0000-PEV-GTX0011-ZZ-DR-A- 9000 P05	September 2021
Existing Block Plan	661277-0000-PEV-GTX0011-ZZ-DR-A- 9001 P05	September 2021
Proposed Block Plan	661277-0000-PEV-GTX0011-ZZ-DR-A- 9002 P06	September 2021
Block Plan Demolition	661277-0000-PEV-GTX0011-ZZ-DR-A- 9101 P04	September 2021
Landscape Masterplan	661277-0000-PEV-GTX0011-XX-DR-L- 0301 P05	September 2021
Existing Section	661277-0000-PEV-GTX0011-ZZ-DR-A- 9003 P05	September 2021
Proposed Section	661277-0000-PEV-GTX0011-ZZ-DR-A- 9004 P04	September 2021
3D Image – Gartree Village Visual	661277-0000-PEV-GTX0011-XX-SK-A- 0019 P04	September 2021
3D Image – Aerial View	661277-0000-PEV-GTX0011-XX-SK-A- 0005 P04	September 2021
3D Image – Aerial View of Entrance	661277-0000-PEV-GTX0011-XX-SK-A- 0007 P01	September 2021
3D Image -ERH Pedestrian Approach	661277-0000-PEV-GTX0011-XX-SK-A- 0007 P04	September 2021
Surface Water Drainage Strategy Plan	661277-0000-PEV-GTX0011-ZZ-DR-C- 0511 P04	September 2021
Proposed Foul Water Drainage Strategy Plan	661277-0000-PEV-GTX0011-ZZ-DR-C- 0561 P04	September 2021
Swept Path Analysis Small Skip Lorry	661277-0000-PEV-GTX0011-ZZ-DR-C- 2607 P03	September 2021
Swept Path Analysis Refuse Vehicle	661277-0000-PEV-GTX0011-ZZ-DR-C- 2605 P03	September 2021
Swept Path Analysis Fire Tender	661277-0000-PEV-GTX0011-ZZ-DR-C- 2602 P03	September 2021
Swept Path Analysis Bus	661277-0000-PEV-GTX0011-ZZ-DR-C- 2608 P01	September 2021
Swept Path Analysis Light Goods Vehicle	661277-0000-PEV-GTX0011-ZZ-DR-C- 2603 P03	September 2021
Swept Path Analysis Standard Vehicle	661277-0000-PEV-GTX0011-ZZ-DR-C- 2604 P04	September 2021
Swept Path Analysis Heavy Goods Vehicle	661277-0000-PEV-GTX0011-ZZ-DR-C- 2601 P03	September 2021
Swept Path Analysis Electric Tug	661277-0000-PEV-GTX0011-ZZ-DR-C- 2606 P04	September 2021
Badger Relocation Strategy Plan	661277-0000-PEV-GTX0011-ZZ-DR-A- 9102 P03	September 2021
External Lighting Plan Sheet 1	661277-0000-PEV-GTX0011-ZZ-DR-E- 6310 P02	September 2021
External Lighting Plan Sheet 2	661277-0000-PEV-GTX0011-ZZ-DR-E- 6311 P02	September 2021
External Lighting Plan Sheet 3	661277-0000-PEV-GTX0011-ZZ-DR-E- 6312 P02	September 2021
BNG Area Calculation Plan	661277-0000-PEV-GTX0011-XX-DR-L- 0701 P06	September 2021
Lighting Report	N/A	September 2021
Planning Statement	N/A	September 2021

Plan	Reference	Date Submitted
Geo-Environmental Appraisal	N/A	September 2021
Design and Access Statement	N/A	September 2021
Landscape and Visual Impact Assessment	N/A	September 2021
Transport Assessment	N/A	September 2021
Travel Plan	N/A	September 2021
Socio - Economic Statement	N/A	September 2021
BREEAM Pre-Assessment	N/A	September 2021
Energy and Sustainability Statement	N/A	September 2021
Ecological Impact Assessment	N/A	September 2021
Phase 1 Habitat Survey	N/A	September 2021
Badger Survey	N/A	September 2021
Non Invasive Species Survey	N/A	September 2021
Reptile Survey	N/A	September 2021
Badger Bait Marking Survey	N/A	September 2021
Bat Roost Survey	N/A	September 2021
Barn Owl Survey	N/A	September 2021
Biodiversity Net Gain calculation	N/A	September 2021
Habitat Classification Planting Palate	N/A	September 2021
Arboricultural Impact Assessment	N/A	September 2021
Flood Risk Assessment	N/A	September 2021
Foul Water Drainage Strategy	N/A	September 2021
Proposed SUDs Strategy Report	N/A	September 2021
Surface Water Drainage Strategy	N/A	September 2021
Air Quality Assessment	N/A	September 2021
Heritage Statement	N/A	September 2021
Geophysical Survey	N/A	September 2021
Archaeological Watching Brief	N/A	September 2021
Archaeology Report Desk Based Assessment	N/A	September 2021
Noise Impact Assessment	N/A	September 2021
Statement of Community Involvement	N/A	September 2021
Construction Traffic Management Plan	N/A	September 2021
Waste Management Strategy	N/A	September 2021
Utility Report	N/A	September 2021
Detailed Unexploded Ordinance (UXO) Risk Assessment	N/A	October 2021
Bat Activity Survey	N/A	November 2021
Biodiversity Net Gain Report	N/A	November 2021
Great Crested Newts Report	N/A	November 2021
Agricultural Land Classification Report Final V2	N/A	December 2021

Plan	Reference	Date Submitted
Gartree Summary Report on Results of the Archaeological Evaluation	N/A	December 2021
Archaeology Report January 2022	N/A	January 2022
Atkins Response to Systra Report (Briefing Note)	N/A	February 2022

#### About Cushman & Wakefield

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