

Development Management Sub Committee

Wednesday 31 July 2019

**Application for Planning Permission 19/01091/FUL
At Ravelston Dykes Quarry, Ravelston Dykes Road,
Edinburgh**

Material and design amendments to approved dwelling house on Plot 3 of planning permission reference 16/05074/FUL. External alterations including changes to materials, window openings and replacement of pitched roof with flat roof garden.

Item number

Report number

Wards

B05 - Inverleith

Summary

The principle of the development of this site was approved under the extant consent (16/05074/FUL). Whilst the proposals are contrary to the Local Development Plan and relevant non-statutory guidance as the proposed development is in the Green Belt, the benefits that the proposals bring outweigh non-compliance. In particular, remediating contaminated land, creating new path networks and enhancing existing ones, increasing accessibility to some parts of the site and improvement to areas of woodland, justify a departure from the development plan in this instance. The proposals will not prejudice nature conservation or protected species, residential amenity or traffic and road safety.

Links

[Policies and guidance for this application](#)

LDPP, LDES03, LDES04, LDES05, LDES06, LEN10, LEN11, LEN12, LEN15, LEN16, LEN18, LEN22, LHOU01, LTRA04, NSG, NSGD02, NSGCGB,

Report

Application for Planning Permission 19/01091/FUL At Ravelston Dykes Quarry, Ravelston Dykes Road, Edinburgh Material and design amendments to approved dwelling house on Plot 3 of planning permission reference 16/05074/FUL. External alterations including changes to materials, window openings and replacement of pitched roof with flat roof garden.

Recommendations

1.1 It is recommended that this application be Granted subject to the details below.

Background

2.1 Site description

The application site relates to the eastern section of the former Ravelston Dykes Quarry (Plot 3) situated on the east side of Ravelston Dykes Road, between its junctions with Craigcrook Road and Ravelston Dykes Lane. There is an existing gated access onto Ravelston Dykes Road. The quarry, which has previously been used for landfill, is screened from the road by ancient woodland. Within the quarry there is a small pond and the remainder of the site has been cleared of shrubs and meadow land in preparation for the construction of dwellings previously consented (16/05074/FUL). The area has historically been fenced off from public access because the soil is contaminated due to its past use as landfill.

The site is surrounded by Ravelston Woods to the south and east, residential properties to the north, and Ravelston Golf Course to the west.

The site lies within the Green Belt as defined by the adopted Edinburgh Local Development Plan. It is also covered by Open Space, Special Landscape Area and Local Nature Conservation Site designations.

2.2 Site History

10 June 2009 - Planning application refused for the erection of three dwelling houses and associated landscaping and access provision(application number 08/03202/FUL).

23 December 2009 - Appeal against the above application dismissed (application number P/PPA/230/1100).

19 April 2016 - Planning permission refused for the erection of three dwelling houses, together with associated landscaping and infrastructure works. (as amended) (application number 15/02354/FUL).

9 April 2018 - Planning permission approved for the erection of 3 dwelling houses, associated landscaping and infrastructure works. (application number 16/05074/FUL).

25 June 2018 - Application to vary condition 2 of the decision notice approved (application number 16/05074/VARY).

6 December 2018 - Application approved to vary the approved road layout consented in application 16/05074/FUL. (application number 16/05074/VAR2).

24 December 2018 - Application was not approved to vary the design and materials consented to in application 16/05074/FUL on the basis that the changes were material. (application number 16/05074/VAR3).

4 March 2019 - Two other applications are lodged concurrently to this one, each one for a dwelling on the site of this former quarry. (application numbers 19/01108/FUL & 19/01090/FUL).

Main report

3.1 Description Of The Proposal

This is one of three applications for dwellings on the site of the former quarry. It follows the granting of consent for three houses on the quarry site in 2018.

This particular house will be situated on Plot 3 and is located on the eastern part of the site in the central grassy area.

The house will be a flat roofed, detached, two storey dwelling with a conservatory and roof terrace on the upper level set within a private garden. The house will be 615 sqm in floor area and external materials will be a combination of stone, timber and curtain walling.

The application differs from the previous application in that it is for one house rather than all three. Although the footprint and overall height is the same, the design has been changed from a sloping roofed structure to a flat roofed building incorporating the roof terrace. Materials and fenestration have also been altered.

Access to the residential properties will be through the existing access off Ravelston Dykes Road. This access road will service the new dwellings from the east beneath the rock face of the quarry, to limit the visual impact of the road from Ravelston Dykes Road.

The perimeter of the site, which is wooded, will be transferred to the council with a sum of money for its continued maintenance. This will be the subject of a legal agreement.

As part of this application, the following documents have been submitted which are available to view on Planning and Building Standard's Online Services:

- Design and Access Statement;
- Planning Statement;
- Planning re-submission Report;
- Planning re-submission Summary;
- Transport Statement;
- Tree Survey Report;
- Arboricultural Impact Assessment and Woodland Management Proposals;
- Contamination Report;
- Ecology Study July 2015;
- Ecology Addendum October 2016;
- Site Assessment for Great Crested Newt;
- Drainage Strategy;
- Pre-development Flow Path;
- Post-development Flow Path;
- Revised Post-development Flow Path;
- Revised Pre-development Flow Path;
- Tree Removals; and
- Flood Risk Assessment.

3.2 Determining Issues

Section 25 of the Town and Country Planning (Scotland) Act 1997 states - Where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise.

Do the proposals comply with the development plan?

If the proposals do comply with the development plan, are there any compelling reasons for not approving them?

If the proposals do not comply with the development plan, are there any compelling reasons for approving them?

3.3 Assessment

To address these determining issues, the Committee needs to consider whether:

- a) the principle of the development is acceptable in this location;
- b) the development will impact on the character and appearance of the Area of Great Landscape Value;
- c) the proposals are of an appropriate scale, form, and design;
- d) the proposals will result in an unreasonable level of neighbouring residential amenity;
- e) the proposals will result in an adequate level of amenity for the future occupiers of the development;

- f) the proposals will have any traffic or road safety issues;
- g) the proposals will have detrimental impact on trees;
- h) the proposals will have detrimental impact on wildlife and biodiversity;
- i) there are any other environmental impacts;
- j) there are any other material considerations; and
- k) any comments raised have been addressed.

a) The Acceptability of the Principle of the Development in this Location

The site is designated 'Green Belt' in the Local Development Plan (LDP) and is also in an area of 'Open Space'. As such Policy Env 10 - Development in the Green belt and Countryside of the LDP applies. This policy presumes against development in the Green Belt other than for uses appropriate to a rural area. Policy Env 18 - Open Space protection applies with respect to building within Open Space.

The site has an extant consent (16/05074/FUL) in which the principle of three dwellings of the same footprint and overall height has been approved. This is a material consideration in the assessment of the current applications for three dwellings.

The proposed housing development is for private sale and is not for an agricultural, woodland, forestry or horticultural purpose. Therefore the proposal is contrary to Policy Env 10: Green Belt. However, the proposals do comply with Env 18 as it has been demonstrated in the previous application that, subject to mitigation in terms of public access and woodland management secured through a legal agreement, it meets the relevant tests. Specifically, the benefits to the community in the decontamination of the land and the opening up of the woodland with new a path network, will outweigh the loss of land that is currently inaccessible due to the contaminated nature of the soil. It will also ensure that the path network is enhanced and that the existing woodland will be brought up to an appropriate standard before coming into Council ownership.

On balance, the existence of the current live consent for three houses, and the benefits obtained by the scheme, are compelling reasons for accepting the non-compliance of the development plan, as previously decided.

Subject to compliance with criteria listed below, the proposals represent an acceptable development in this location.

b) Impact on Area of Great Landscape Value

The site lies within a designated special landscape Area (SLA). Policy Env 11 - Special Landscape Areas applies and states that "planning permission will not be granted for development which would damage or detract from the overall character and appearance of the Areas of Great Landscape Value". The character of the site was of a large meadow surrounded by a woodland edge and the quarry face. The open quality of the site will be altered by the development and will become suburban rather than rural in character. However, if the woodland area surrounding the development is managed, as outlined in the Woodland Management Proposals and screens the development, the impact on the overall AGLV will be limited. The development of this site for housing would not be detrimental to the larger area's landscape character.

The proposals comply with policy Env 11.

c) Scale, Form and Design

Edinburgh Local Development Plan policy Des 1 - Design Quality and Context states planning permission will be granted for development where it is demonstrated that the proposal will create or contribute towards a sense of place. Planning permission will not be granted for poor quality or inappropriate design that would be damaging to the character of the area. Policy Des 4 - Development Design states development should have a positive impact on its surroundings, having regard to height and form; scale and proportions, including the spaces between buildings; position of buildings and other features on the site; and materials and detailing.

The Edinburgh Design Guidance sets out key aims for new development to have a positive impact on the immediate surroundings, through its height and form; scale and proportions; positioning of the buildings on site and materials and detailing.

The amended scheme proposes a two storey, detached dwelling with a conservatory structure and roof deck on the flat roof and using stone, timber and curtain walling as external materials. As there is no immediate urban context, the buildings are not incompatible with the area, and the design can be seen as a stand alone proposal. The houses are large, but these cannot be compared with any immediate neighbours and against the backdrop of the quarry face, the scale is appropriate. The materials and design are acceptable.

The proposals are acceptable in terms of scale, form and design and comply with Policies Des 1 and Des 4.

d) Neighbouring Amenity

Policy Des 5 - Development Design relates in part to neighbouring amenity.

The new build will be located a considerable distance away from the nearest house and therefore the proposals comply with the Non-statutory Design Guidance with respect to privacy, overshadowing and daylight.

There will be no detrimental impact on neighbouring amenity and Des 5 is complied with.

e) Amenity of Future Occupiers

Policy Des 5 - Development Design also relates to the amenity of the future occupiers of the development.

The dwelling will receive enough daylight internally, and the garden will receive sufficient sunlight. There is an acceptable amount of private open space.

The dwelling is very large and the future occupiers will have a satisfactory level of amenity.

The amenity of the future occupiers will be acceptable in compliance with Policy Des 5.

f) Traffic or Road Safety Issues

Policy Tra 4 relates to the design of off street car and cycle parking and Policies Tra 2 and 3 relate to the provision of car and cycle parking.

One access point off Ravelston Dykes Road serves a road leading to garage opening to the rear of the property and providing accommodation for two cars and cycle accommodation.

An informative is recommended stating that a travel pack for new occupiers should be provided prior to occupation.

The proposals are acceptable in terms of traffic and road safety and compliance with policies 2, 3 and 4 can be achieved.

g) Impact on Trees

Policy Env 12 relates to trees and woodland.

A tree survey has been submitted and assessed. The main bulk of development will occur in the meadow area and a limited number of trees will be required to be felled. There will be eight trees felled at the entrance area, and a further five trees located more centrally have already been removed under the existing consent. The woodland is currently underused and lacks management. A comprehensive scheme of woodland management would mitigate the loss of healthy trees and would screen the development. The proposals are that the woodland which rings the site will be transferred to the Council, brought up to an appropriate standard and that a contribution of £25,000 per dwelling, be made to ensure that the Council has the means to continue to look after the woodland into the future. This will be secured through a legal agreement. The principle of this tree loss and the tree management proposal was approved under application 16/05074/FUL.

The principle of this tree loss and the tree management proposal was approved under application 16/05074/FUL.

The small loss of trees on the site is within an acceptable range, given the overall benefits that an appropriate scheme of woodland management can bring to the whole of the site and this outweighs the losses. The impact on the trees is acceptable and compliance with Policy Env 12 is achieved.

h) Impact on Wildlife and Biodiversity

The site is located within a Local Nature Conservation Site which covers the wider area of Ravelston Woods and Corstorphine Hill. Policy Env 15 - Sites of local Importance applies, which presumes against development within a Local Nature Conservation Site, unless the reasons for allowing the development are sufficient to outweigh the nature conservation interest of the site and the adverse consequences of allowing the development have been minimised and mitigated in an acceptable manner. The principle of this was accepted under application 16/05074/FUL. It is considered that the benefits that the development offers in remediating the contaminated land on the site and the creation of paths and reinforcing of existing path networks, justify the loss of a small area of the Local Conservation Site. As the site is relatively small the overall integrity of the conservation site will be retained. In this respect, the adverse impact of the development is minimised and public accessibility enhanced.

Policy Env 16 states that planning permission will not be granted for development that would have an adverse impact on species protected under European or UK law. Both an Ecology Survey and an Amphibian Assessment have been submitted. There is no evidence of active badger sets on the site and continued badger camera traps are monitoring possible sets on adjacent land. Conditions are recommended in this respect. Fences shall be constructed with a 225 mm gap at their base so as to allow badgers to traverse the site.

No bats have been found to be roosting on the site, however as they do use trees for commuting, no felling should be done without checking for bats.

Sufficient evidence has been provided to ensure that measures are in place to limit the impact on wildlife and their habitat and the proposed development within the Local Nature Conservation Site is acceptable. Policy compliance with Env 15 and 16 can be achieved.

i) Environmental Impacts

Flooding:

Policy Env 21 relates to flood protection. Information has been submitted with respect to drainage and flood risk. This can be seen on the Planning and Building Standards Online Services. The information provided indicates that drainage is satisfactory and there is no additional risk of flooding.

Contamination:

The applicant has submitted a remediation strategy to address the contamination of land due to its former use as a landfill. Environmental Services does not object to this subject to the conditions attached.

Overall, the environmental concerns of contaminated soil and flooding will be appropriately addressed.

j) Other Material Considerations

The previous application (16/05074/FUL) approved the principle of three dwellings on this former quarry site. The three applications that have currently been submitted are different only in terms of the external design of the buildings. The granting of this previous consent for an application has established that the principle and layout of dwelling on this site, subject to compliance with attached conditions.

k) Public Comments

Material objections:

- Amenity of Neighbouring Properties - Assessed in section 3.3.d).

Non-material Representations:

There are no non-material representations.

Conclusion

In conclusion, the principle of the development of this site was approved under the extant consent (16/05074/FUL). Whilst the proposals are contrary to the Local Development Plan and relevant non-statutory guidance in that the proposed development is in the Green Belt, the benefits that the proposals bring in remediating contaminated land, creating new path networks and enhancing existing ones, increasing accessibility to some parts of the site and improvement to areas of woodland, justify a departure from the development plan in this instance and outweigh non-compliance. The proposals will not prejudice nature conservation or protected species, residential amenity or traffic and road safety.

The recommendation is subject to conditions on landscaping, materials, contaminated land and badgers, as well as the conclusion of a legal agreement for the conveyancing of land to the Council, which is to include a contribution of £25,000 towards the expense that will be incurred by the Council for the maintenance of the woodland that it will take into its care.

It is recommended that this application be Granted subject to the details below.

3.4 Conditions/reasons/informatives

Conditions:-

1. A detailed specification, including trade names where appropriate, of all the proposed external materials shall be submitted to and approved in writing by the Planning Authority before work is commenced on site; Note: samples of the materials may be required.
2. Prior to the commencement of construction works on site:

- (a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and
- (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning

Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning.

3. A fully detailed landscape plan, including the location of the public path, details of all hard and soft surfaces, and boundary treatments and all planting, shall be submitted to and approved in writing by the Planning Authority before work is commenced on site and to be implemented within six months of the date of first occupation.
4. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (Scotland) Order, 1992, as amended, gates, fences walls and other means of enclosure shall be constructed with 225mm gaps at their base so as to allow badgers to traverse the site. Such gaps shall be 1 metre wide and constructed at centres of not more than 10 metres along the boundary.

Reasons:-

1. In order to enable the planning authority to consider this/these matter/s in detail.
2. In order to ensure that the site is suitable for redevelopment, given the nature of previous uses/processes on the site.
3. In order to ensure that the approved landscaping works are properly established on site.
4. In the interest of protected species.

Informatives

It should be noted that:

1. The applicant shall enter into a suitable legal agreement to ensure public access and woodland management in perpetuity on the part of the site outwith plots 1, 2 and 3 as specified on the proposed location plan.
2. The development hereby permitted shall be commenced no later than the expiration of three years from the date of this consent.

3. No development shall take place on the site until a 'Notice of Initiation of Development' has been submitted to the Council stating the intended date on which the development is to commence. Failure to do so constitutes a breach of planning control, under Section 123(1) of the Town and Country Planning (Scotland) Act 1997.
4. As soon as practicable upon the completion of the development of the site, as authorised in the associated grant of permission, a 'Notice of Completion of Development' must be given, in writing to the Council.
5. Clearance of vegetation/trees from the proposed construction areas has the potential to disturb nesting birds; therefore clearance should be carried out outside the bird nesting season March - August (inclusive). Should it be necessary to clear ground during the bird nesting season the land should be surveyed by a suitably qualified ecologist and declared clear of nesting birds before vegetation clearance starts.
6. The programme of removal of Japanese Knotweed is to be continued.
7. All accesses must be open for use by the public in terms of the statutory definition of 'road' and require to be the subject of applications for road construction consent, i.e. the road leading to the properties will be built to an adoptable standard. The main access will be required to be brought up to an adoptable standard.
8. Any proposed on-street car parking spaces cannot be allocated to individual properties, nor can they be the subject of sale or rent. The spaces will form part of the road and as such will be available to all road users. Private enforcement is illegal and only the Council as roads authority has the legal right to control on-street spaces, whether the road has been adopted or not. The developer is expected to make this clear to prospective residents.
9. Refuse storage facilities should be within 30 metres of an area which can be accessed by a refuse removal vehicle.
10. Any works affecting the existing carriageway/footway on Ravelston Dykes Road must be carried out in accordance with "Development Roads - Guidelines and Specification". See pages 5, 15 & 16 of http://www.edinburgh.gov.uk/download/downloads/id/704/guidance_for_householders.
11. The applicant should include a 7KW (type 2) electric vehicle charging point.
12. All trees to be checked for bats before felling.

Financial impact

4.1 The financial impact has been assessed as follows:

A legal agreement will require a financial contribution for the continued maintenance of the surrounding woodland.

Risk, Policy, compliance and governance impact

5.1 Provided planning applications are determined in accordance with statutory legislation, the level of risk is low.

Equalities impact

6.1 The equalities impact has been assessed as follows:

The application has been assessed and has no impact in terms of equalities or human rights.

Sustainability impact

7.1 The sustainability impact has been assessed as follows:

This application is not subject to the sustainability requirements of the Edinburgh Design Guidance.

Consultation and engagement

8.1 Pre-Application Process

Pre-application discussions took place on this application.

8.2 Publicity summary of representations and Community Council comments

No representations have been received.

Background reading/external references

- To view details of the application go to
- [Planning and Building Standards online services](#)
- [Planning guidelines](#)
- [Conservation Area Character Appraisals](#)
- [Edinburgh Local Development Plan](#)
- [Scottish Planning Policy](#)

**Statutory Development
Plan Provision**

The site lies within Green Belt in the Edinburgh Local Development Plan and is within an area of Open Space, a Special Landscape Area and a Local Nature Conservation Site.

Date registered

4 March 2019

Drawing numbers/Scheme

David R. Leslie
Chief Planning Officer
PLACE
The City of Edinburgh Council

Contact: Barbara Stuart, Senior Planning Officer
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Links - Policies

Relevant Policies:

Relevant policies of the Local Development Plan.

LDP Policy Des 3 (Development Design - Incorporating and Enhancing Existing and Potential Features) supports development where it is demonstrated that existing and potential features have been incorporated into the design.

LDP Policy Des 4 (Development Design - Impact on Setting) sets criteria for assessing the impact of development design against its setting.

LDP Policy Des 5 (Development Design - Amenity) sets criteria for assessing amenity.

LDP Policy Des 6 (Sustainable Buildings) sets criteria for assessing the sustainability of new development.

LDP Policy Env 10 (Development in the Green Belt and Countryside) identifies the types of development that will be permitted in the Green Belt and Countryside.

LDP Policy Env 11 (Special Landscape Areas) establishes a presumption against development that would adversely affect Special Landscape Areas.

LDP Policy Env 12 (Trees) sets out tree protection requirements for new development.

LDP Policy Env 15 (Sites of Local Importance) identifies the circumstances in which development likely to affect Sites of Local Importance will be permitted.

LDP Policy Env 16 (Species Protection) sets out species protection requirements for new development.

LDP Policy Env 18 (Open Space Protection) sets criteria for assessing the loss of open space.

LDP Policy Env 22 (Pollution and Air, Water and Soil Quality) sets criteria for assessing the impact of development on air, water and soil quality.

LDP Policy Hou 1 (Housing Development) sets criteria for assessing the principle of housing proposals.

LDP Policy Tra 4 (Design of Off-Street Car and Cycle Parking) sets criteria for assessing design of off-street car and cycle parking.

Relevant Non-Statutory Guidelines

Non-Statutory guidelines Edinburgh Design Guidance supports development of the highest design quality and that integrates well with the existing city. It sets out the Council's expectations for the design of new development, including buildings, parking, streets and landscape, in Edinburgh.

Non-statutory guidelines DEVELOPMENT IN THE COUNTRYSIDE AND GREEN BELT, provide guidance on development in the Green Belt and Countryside in support of relevant local plan policies.

Appendix 1

**Application for Planning Permission 19/01091/FUL
At Ravelston Dykes Quarry, Ravelston Dykes Road,
Edinburgh
Material and design amendments to approved dwelling
house on Plot 3 of planning permission reference
16/05074/FUL. External alterations including changes to
materials, window openings and replacement of pitched roof
with flat roof garden.**

Consultations

Archaeology

Further to your consultation request I would like to make the following comments and recommendations concerning this application for material and design amendments to approved dwelling house on Plot 1 of planning permission reference 16/05074/FUL. External alterations including changes to materials, window openings and replacement of pitched roof with flat roof garden.

The site occupies an historic 18th/19th century quarry situated to the NW of the late Georgian House of Ravelston. The current Georgian (now occupied by Mary Erskine's School) is the last of a series of estate centres dating back to the medieval period with the site first recorded in the 14th century. The application site lies within the historic former grounds of this estate and as such occurs within an area of archaeological potential.

As the development is contained within the footprint of the former quarry no significant buried remains will be affected and as such there are no known archaeological implications upon this application.

Transport

No objections to the application.

Flooding

for the consultation request. Provided the FFL of Plot 1 has not been lowered from the previously agreed 53.900mAOD on the lower ground floor level then we have no further comment to make. This email covers applications 19/01108/FUL, 19/01090/FUL & 19/01091/FUL.

Environmental Services

TOWN AND COUNTRY PLANNING SCOTLAND ACT 1997

Material and design amendments to approved dwelling house on Plot 1 of planning permission reference 16/05074/FUL. External alterations including changes to materials, window openings and replacement of pitched roof with flat roof garden. (19/01108/FUL).

The applicant proposes the erection of a dwelling house at Ravelston Dykes Quarry. Environmental Protection have commented on a similar proposal for this site previously. This is currently an undeveloped site of mature woodland with some existing dwellings approximately 50m to the north. Ravelston Dykes borders the site to the west.

This is a fairly quiet site with the only noise source being road traffic on Ravelston Dykes to the west; this is not considered to be of a level which will have a negative impact on amenity.

Previous uses of the site indicate that the land could have become contaminated and should be investigated to ensure that the site is made safe for the intended end use. A condition is recommended in this regard.

As the application includes parking provisions Environmental Protection would recommend that the applicant includes a 7KW (type 2) electric vehicle charging point.

Environmental Protection has no objections to this proposed development, subject to the following condition:

Prior to the commencement of construction works on site:

- (a) A site survey (including initial desk study as a minimum) must be carried out to establish to the satisfaction of the Head of Planning, either that the level of risk posed to human health and the wider environment by contaminants in, on or under the land is acceptable, or that remedial and/or protective measures could be undertaken to bring the risks to an acceptable level in relation to the development; and*
- (b) Where necessary, a detailed schedule of any remedial and/or protective measures, including their programming, must be submitted to and approved in writing by the Head of Planning*

Any required remedial and/or protective measures shall be implemented in accordance with the approved schedule and documentary evidence to certify those works shall be provided to the satisfaction of the Head of Planning

Informative

- 1. The applicant should include a 7KW (type 2) electric vehicle charging point.*

Parks and Greenspace

No comments.

Location Plan



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