

A19 Downhill Lane Junction Improvement

Scheme Number: TR010024

7.14 Applicant's Responses to Written Representations

Rule 8(1)(c)(i)
Planning Act 2008
Infrastructure Planning (Examination Procedure)
Rules 2010

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

A19 DOWNHILL LANE JUNCTION IMPROVEMENT

The A19 Downhill Lane Junction Development Consent Order 202[]

APPLICANT'S RESPONSES TO WRITTEN REPRESENTATIONS

Regulation Number:	Rule 8(1)(c)(i)
Planning Inspectorate Scheme Reference	TR010024
Application Document Reference	TR010024/APP/7.14
Author:	A19 Project Team, Highways England & Jacobs

Version	Date	Status of Version
Rev 0	September 2019	Submitted for Examination Deadline 2

Page Left Intentionally Blank

Extract	Applicant Response
Natural England	
<p><i>Letter dated 22 August 2019</i></p> <p>2.1. International conservation designations</p> <p>2.1.1. Natural England is satisfied that there is no pathway for impacts from the project upon any internationally designated sites of conservation importance, and has no concerns in this regard.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 22 August 2019</i></p> <p>2.2. National conservation designations</p> <p>2.2.1. Natural England is satisfied that there is no pathway for impacts from the project upon any nationally designated conservation sites, and has no concerns in this regard.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 22 August 2019</i></p> <p>2.3. European Protected Species</p> <p>2.3.1. Natural England is satisfied that any impacts on European Protected Species have been identified through appropriate surveys, and suitable protection is in place through the draft DCO conditions should any European protected species be encountered during the project lifetime.</p>	<p>Noted, and agreed.</p>

Extract	Applicant Response
<p><i>Letter dated 22 August 2019</i></p> <p>2.4. Nationally Protected Species</p> <p>2.4.1. Natural England is satisfied that any impacts upon Nationally Protected Species have been identified through appropriate surveys, and suitable protection is in place through the draft DCO conditions should any nationally protected species be encountered during the project lifetime.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 22 August 2019</i></p> <p>2.5. Landscape designations</p> <p>2.5.1. Natural England is satisfied that there will be no impacts upon designated landscapes as a result of the project.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 22 August 2019</i></p> <p>2.6. Conclusions</p> <p>2.6.1. Natural England is satisfied that the proposal will not impact upon any designated sites or protected species, and has no concerns in relation to the project.</p>	<p>Noted, and agreed.</p>
<p><i>Response to ExA's Question 1.3.2 from the Rule 8 letter:</i></p> <p>Natural England can confirm that there is no potential for the Scheme to impact upon any Natura 2000 sites, and that screening for effects is not necessary.</p>	<p>Noted, and agreed.</p>

Extract	Applicant Response
<p><i>Response to ExA's Question 1.3.3 from the Rule 8 letter:</i></p> <p>Natural England generally considers surveys less than 3 years old to be a valid representation of the current situation. The surveys from 2014 provide useful context, but are not representative of the status of species in the area at this moment.</p> <p>Further surveys are expected to take place prior to works in areas where species have been identified in previous surveys to ensure there are no impacts from the works.</p>	<p>The Applicant refers to its response to ExA's Question 1.3.3 (Application Document Reference: TR010024/APP/7.13). As set out in that response, the Applicant has carried out further surveys between 2017 and 2019.</p>
Sunderland City Council	
<p><i>Letter dated 23 August 2019</i></p> <p>In response to Question 21, regarding the imposition of a speed limit of 40mph on roads identified within the schedule. This is agreed in principle. It should be noted that the roundabout junction and approach roads are located away from built up residential areas, and the A1290 Washington Road is already subject to a 40mph limit. The scheme also provides a safe alternative route for pedestrians and cyclists, and removes the need for these highway users to travel through the junction.</p>	<p>Noted, and agreed (see further the Applicant's response to Question 21 in Appendix 1 of the Written Submission of the Applicant's Case at ISH1 and OFH (Application Document Reference: TR010024/APP/7.8 / REP1-010).</p>
<p><i>Response to ExA's Question 21 from the Rule 6 letter:</i></p> <p>Sunderland City Council ('SCC') supportive of the 40mph speed limit and has no issues.</p>	<p>Noted, and agreed.</p>

Extract	Applicant Response
<p><i>Letter dated 23 August 2019</i></p> <p>In response to Question 24, it is noted that article 12(6) contains provisions for deeming consent to the temporary stopping up and restriction of use of streets if the consenting body fails to respond to the applicant within 28 days. This is agreed in principle. Both Sunderland and South Tyneside Councils are invited by Highways England to attend a regular monthly Traffic Management Forum as part of the A19 Testo's scheme. This forum allows for advance notification of works requiring temporary road closures and diversions, prior to any formal consultation which should address this issue.</p>	<p>Noted, and agreed.</p>
<p><i>Response to ExA's Question 24 from the Rule 6 letter:</i></p> <p>SCC is aware of the 28 days' time period in which to make a response to a request for consent or it will be deemed consent. SCC considers that it should be able to respond in that time scale and that this time scale is in line with the approved DCO for the Testo's scheme.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 23 August 2019</i></p> <p>In response to Question 25, it is noted that article 14 contains provisions for the forming or improving means of access for the purposes of authorised development. This is agreed in principle. However, any new accesses particularly from a classified road should be discussed and agreed with the respective local authority prior to installation. The access arrangements should also remain temporary, and therefore not subject to adoption as public highway. This requirement could be detailed within a Side Agreement.</p>	<p>The Applicant confirms that it is actively seeking to conclude a side agreement on these matters with both local authorities, and will update the ExA at the earliest opportunity. The Applicant does not anticipate any impediment to agreement being reached on these points.</p>

Extract	Applicant Response
<p><i>Response to ExA's Question 25 from the Rule 6 letter:</i></p> <p>SCC would comment that if a permanent access was to be created or improved without the consent of SCC, to which SCC would become responsible for its maintenance, then there would need to be some provision to cover the costs of defects in construction of that access. This could be covered off in a Side Agreement, which SCC and HE will liaise on.</p>	<p>As above.</p>
<p><i>Response to ExA's Question 35 from the Rule 6 letter:</i></p> <p>SCC would comment that the draft DCO does not specify the affected trees or hedgerows to be removed to be able to comment on it. However, SCC is liaising with HE and South Tyneside Council ('STC') to determine what is affected.</p>	<p>The Applicant would refer to its response to Question 35 in Appendix 1 of the Written Submission of the Applicant's Case at ISH1 and OFH (Application Document Reference: TR010024/APP/7.8 / REP1-010).</p>
<p><i>Letter dated 23 August 2019</i></p> <p>In response to Question 41 relating to the detailed design, a request made by the applicant around a potential change to the scheme seeking authorisation by way of an amendment. The change being to remove the non-motorised user bridge from the proposed location to an alternative location further to the south. At the ISH1 hearing, the applicant stated that the current scheme design is at a preliminary design stage, and is currently investigating this option. It is noted that the decision to consider this proposal is at your discretion. In principle, the provision of a route on an appropriate desire line for non-motorised users, and fully segregated from traffic on the A19 corridor is acceptable. However, Sunderland would wish to reserve its position until further evidence is provided.</p>	<p>As explained in the Applicant's letter dated 27 August 2019 (REP1-001), the Applicant has now concluded it is not progressing the integrated NMU provision at this juncture.</p>

Extract	Applicant Response
<p><i>Response to ExA's Question 41 from the Rule 6 letter:</i></p> <p>SCC note that the current scheme design is at a preliminary design stage. It is noted that the applicant is proposing an alternative alignment for the non-motorised user bridge to the south of the junction. In principle, the provision of a route on an appropriate desire line for non-motorised users, and fully segregated from traffic on the A19 corridor is acceptable. However, SCC wish to reserve its position until further evidence is provided.</p>	<p>As above.</p>
<p><i>Response to ExA's Question 43 from the Rule 6 letter:</i></p> <p>SCC have no issue with the discharging of requirements set in Schedule 2 being in part where applicable. This practice is well used in terms of adoption of highways and was used in the nearby Testo's DCO.</p>	<p>Noted, and agreed. The Applicant refers to its response to Question 43 in Appendix 1 of the Written Submission of the Applicant's Case at ISH1 and OFH (Application Document Reference: TR010024/APP/7.8 / REP1-010).</p>
<p><i>Letter dated 23 August 2019:</i></p> <p>In response to Questions 43 and 45, Sunderland City Council are content for the discharge of conditions to be dealt with by the Secretary of State. However, it should be noted that South Tyneside Council may wish to be responsible for the discharge of certain conditions of local interest to the authority. This approach was previously adopted for the consented DCO for the A19 / A184 Testo's Junction Improvement Scheme.</p>	<p>The Applicant would refer to section 5 of the Written Submission of the Applicants Case at ISH1 (Application Document Reference: TR010024/APP/7.8 / REP1-010). The Applicant would further note that South Tyneside has confirmed it is content with the approach of the Secretary of State discharging conditions.</p> <p>In summary, the Secretary of State's position as discharging authority for the Applicant's schemes is well precedented, reflects arrangements agreed between the Applicant and the Department for Transport, and is required to ensure alignment between the Scheme and the A19 Testo's scheme which are proposed to be delivered concurrently. It should also be noted that there are two host local authorities in this case. The Applicant would note that the local authorities have a consultative role under the Requirements should they wish to make any representations as part of that process.</p>

Extract	Applicant Response
<p><i>Response to ExA Question 45 from the Rule 6 letter:</i></p> <p>SCC would comment that although this Schedule is not in compliance with Advice Note 15 Appendix 1, SCC is satisfied that the Secretary of State discharges the requirements in consultation with SCC (where applicable) as opposed to SCC and STC discharging the requirements. This is a similar provision to that in the Testo's DCO.</p>	<p>Noted, and agreed.</p>
<p>The only comment that SCC would make is that as there is no appeal mechanism provided would any dispute regarding discharge of requirements be via Arbitration and who would be responsible for payment of that. Also, would SCC in consultation with the Secretary of State be able to prevent discharge of requirements if they were unsatisfied that requirements had not been discharged accordingly.</p>	<p>The Applicant would refer to its response directly above, in particular noting that the local authorities would have a consultative role in the discharge of the Requirements where relevant. The Applicant notes that Part 8 of the Planning Act 2008 sets out enforcement provisions in circumstances where a local planning authority considers the terms of an Order has not been complied with.</p>
<p>South Tyneside Council</p>	
<p><i>Letter dated 27 August 2019:</i></p> <p>In response to Question 21, regarding the imposition of a speed limit of 40mph on roads identified within the schedule. This is agreed in principle. It should be noted that the roundabout junction and approach roads are located away from built up residential areas, and the A1290 Washington Road is already subject to a 40mph limit. The scheme also provides a safe alternative route for pedestrians and cyclists, and removes the need for these highway users to travel through the junction.</p>	<p>Noted, and agreed (see further the Applicant's response to Question 21 in Appendix 1 of the Written Submission of the Applicant's Case at ISH1 and OFH (Application Document Reference: TR010024/APP/7.8 / REP1-010)).</p>

Extract	Applicant Response
<p><i>Response to ExA's Question 21 from the Rule 6 letter:</i></p> <p>South Tyneside Council ('STC') is supportive of the 40mph speed limit and has no issues.</p>	<p>Noted, and agreed.</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>In response to Question 24, it is noted that article 12(6) contains provisions for deeming consent to the temporary stopping up and restriction of use of streets if the consenting body fails to respond to the applicant within 28 days. This is agreed in principle. Both Sunderland and South Tyneside Councils are invited by Highways England to attend a regular monthly Traffic Management Forum as part of the A19 Testo's scheme. This forum allows for advance notification of works requiring temporary road closures and diversions, prior to any formal consultation which should address this issue.</p>	<p>Noted, and agreed.</p>
<p><i>Response to ExA's Question 24 from the Rule 6 letter:</i></p> <p>STC is aware of the 28 days' time period in which to make a response to a request for consent or it will be deemed consent. STC considers that it should be able to respond in that time scale and that this time scale is in line with the approved DCO for the Testo's scheme.</p>	<p>Noted, and agreed.</p>

Extract	Applicant Response
<p><i>Letter dated 27 August 2019:</i></p> <p>In response to Question 25, it is noted that article 14 contains provisions for the forming or improving means of access for the purposes of authorised development. This is agreed in principle. However, any new accesses particularly from a classified road should be discussed and agreed with the respective local authority prior to installation. The access arrangements should also remain temporary, and therefore not subject to adoption as public highway. This requirement could be detailed within a Side Agreement.</p>	<p>The Applicant confirms that it is actively seeking to conclude a side agreement on these matters with South Tyneside Council, and will update the ExA at the earliest opportunity. The Applicant does not anticipate any impediment to agreement being reached on these points.</p>
<p><i>Response to ExA's Question 25 from the Rule 6 letter:</i></p> <p>STC would comment that if a permanent access was to be created or improved without the consent of STC, to which STC would become responsible for its maintenance, then there would need to be some provision to cover the costs of defects in construction of that access. This could be covered off in a Side Agreement, which STC and HE will liaise on.</p>	<p>As above.</p>
<p><i>Response to ExA's Question 35 from the Rule 6 letter:</i></p> <p>STC would comment that the draft DCO does not specify the affected trees or hedgerows to be removed to be able to comment on it. However, STC is liaising with HE and Sunderland City Council ('SCC') to determine what is affected.</p>	<p>The Applicant refers to its response to Sunderland City Council's identical written representation.</p>

Extract	Applicant Response
<p><i>Letter dated 27 August 2019:</i></p> <p>In response to Question 41 relating to the detailed design, a request made by the applicant around a potential change to the scheme seeking authorisation by way of an amendment. The change being to remove the non-motorised user bridge from the proposed location to an alternative location further to the south. At the ISH1 hearing, the applicant stated that the current scheme design is at a preliminary design stage, and is currently investigating this option. It is noted that the decision to consider this proposal is at your discretion. In principle, the provision of a route on an appropriate desire line for non-motorised users, and fully segregated from traffic on the A19 corridor is acceptable. However, STC would wish to reserve its position until further evidence is provided.</p>	<p>The Applicant refers to its response to Sunderland City Council's identical written representation.</p>
<p><i>Response to ExA's Question 41 from the Rule 6 letter:</i></p> <p>STC note that the current scheme design is at a preliminary design stage. It is noted that the applicant is proposing an alternative alignment for the non-motorised user bridge to the south of the junction. In principle, the provision of a route on an appropriate desire line for non-motorised users, and fully segregated from traffic on the A19 corridor is acceptable. However, STC wish to reserve its position until further evidence is provided.</p>	<p>As above.</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>In response to Question 43 and 45, South Tyneside Council is content for the discharge of conditions to be dealt with by the Secretary of State. This approach was previously adopted for the consented DCO for the A19 /A184 Testo's Junction Improvement Scheme.</p>	<p>Noted, and agreed. The Applicant refers to its response to Question 43 in Appendix 1 of the Written Submission of the Applicant's Case at ISH1 and OFH (Application Document Reference: TR010024/APP/7.8 / REP1-010).</p>

Extract	Applicant Response
<p><i>Response to ExA's Question 43 from the Rule 6 letter:</i></p> <p>STC has no issue with the discharging of requirements set in Schedule 2 being in part where applicable. This practice is well used in terms of adoption of highways and was used in the nearby Testo's DCO.</p>	<p>As above.</p>
<p>Hellens</p>	
<p><i>Letter dated 27 August 2019:</i></p> <p>Hellens Land Ltd represent Joan Natrass of 6 Castle View, Chester Le Street, County Durham DH3 3XA and Paul Irving Natrass of 158 Highfield Rise, Chester le Street, Co Durham DH3 3UY and David James Natrass of 12 Graythwaite, Chester le Street, Co Durham, DH2 2UH in relation to land registered under title number TY301280 known as Downhill Farm, Downhill Lane, West Boldon, NE36 0AX.</p> <p>Hellens Land Ltd have a Promotion Agreement on the land and have been promoting the land for residential use for a number of years.</p>	<p>Noted. The Applicant has met jointly with representatives from Hellens and the Natrass family on a number of occasions.</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>The land in relation to the DCO can be identified as plots 1/7a, 1/7b and 1/7c on Land Plans– Regulation 5(2)(i) – Sheet 1 of 2.</p> <p>Overall, we do not object to the proposed DCO and recognise the benefits that the proposed improvements will bring to the A19 and Downhill Lane junction.</p>	<p>Noted.</p>

Extract	Applicant Response
<p><i>Letter dated 27 August 2019:</i></p> <p>Our main concerns relate to the proposed Compulsory Acquisitions and we respond specifically to Q1.4.10 of the Inspector's Written Questions (ExQ1).</p>	<p>The Applicant refers to its response to ExA's Question 1.4.10 (Application Document Reference: TR010024/APP/7.13).</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>A consultation by South Tyneside Council has just commenced on their Draft Local Plan (Regulation 18). Within the Local Plan, the wider site within Hellens Land Ltd control has been allocated as a large housing allocation to contribute to the authorities' objectively assessed need for housing. For reference, an extract of the Local Plan showing the proposed allocation is detailed below.</p> <p>[...]</p> <p>In addition, the proposed land acquisition for this parcel has an impact on the delivery of the housing allocation site (subject to the Local Plan progressing and being found sound by the Inspector when submitted).</p>	<p>The Applicant would note that the draft Local Plan is at an early stage in the plan making process. The Applicant will be submitting representations concerning the draft Local Plan as it progresses, including representations on the proposed draft allocation mentioned. These representations will be considered by South Tyneside Council and by an appointed Inspector as part of its examination. The draft Local Plan is therefore not at a stage which would permit reliance on it.</p> <p>Whilst the primary policy document for the Scheme is the National Networks National Policy Statement, the Applicant would refer to the wide ranging and current national, regional and local policy support for the Scheme in this particular location in the Planning Statement (Application Document Reference: TR010024/APP/7.1 / APP-050). In particular, the Applicant notes:</p> <ul style="list-style-type: none"> (i) National policy in the form of the Road Investment Strategy identifies the need for this scheme (see paragraphs 5.2.20 to 5.2.25 of the Planning Statement); and (ii) the IAMP Area Action Plan, which has been adopted by both South Tyneside Council and Sunderland City Council, supports the location of the Scheme - see Figure 5-1 (taken from the IAMP AAP) in the Planning Statement, and in particular, the extent of land caught by "A19 and Local Improvements Policy T1". This figure is reproduced below for ease of reference.

Extract

Applicant Response

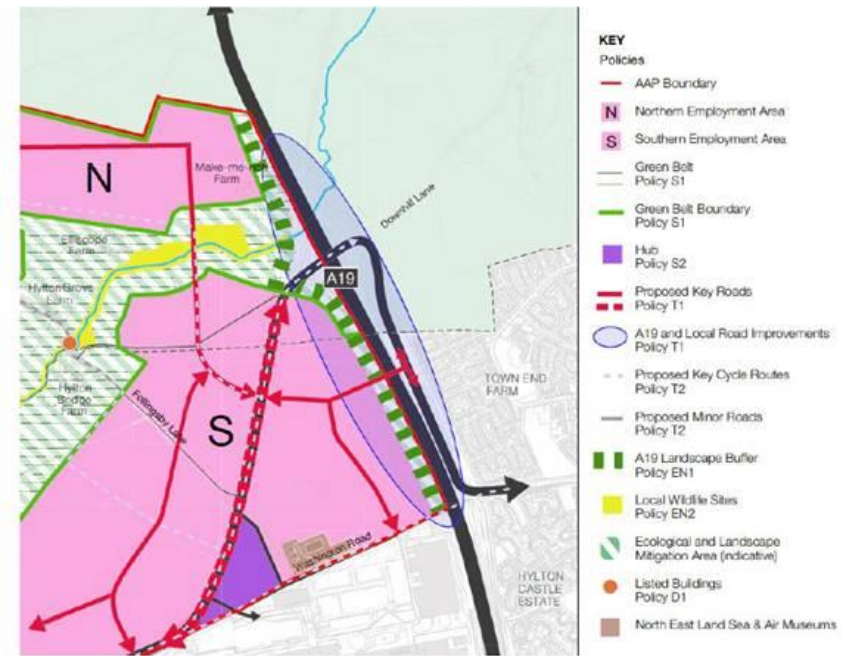


Figure 5-1 – Extract from IAMP AAP showing Green Belt boundary

The Applicant would further note that it has served a notification of development in respect of the Downhill Lane Junction upgrade upon Sunderland City Council and South Tyneside Council. This relates the following process, which safeguards land proposed for highway improvement schemes, and so is a form of statutory planning control relevant to the points being raised by Hellens.

The notification itself is the Applicant's trigger for the process under Article 18(1) of the Town and Country Planning (Development Management) (Procedure) (England) Order 2015. It alerts a local planning authority to the need to consult the Applicant prior to granting any planning permission that is likely to have the effects specified in specific

Extract	Applicant Response
	<p>paragraphs contained in Schedule 4 of that Order.</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>Parcel 1/7a proposes a permanent land acquisition on a substantial parcel of land immediately to the east of the A19. We understand and accept that some land will be required to facilitate the works, we do not however agree with the approach taken in relation to the need for land for the NMU route. IAMP are currently in the process of consultation on the proposed DCO for IAMP Two. The IAMP Two proposal also proposes a NMU route. If the IAMP Two DCO does come forward then the proposed NMU route for the Downhill Lane DCO will not be required. We believe that there should be a more combined approach between the two separate DCO's. We note that Highways England have submitted additional information in relation to this and we would welcome the Inspector accepting these as amendments to the DCO and included in the Evidence Library.</p>	<p>The Applicant has taken all reasonable steps to progress an integrated NMU provision. Having considered the queries from the Examining Authority in the initial hearings regarding the integrated NMU provision (on which see, in particular, AS-022 and AS-016), and having considered further the information currently available, the Applicant has concluded it will not progress the integrated NMU provision at this juncture.</p>

Extract	Applicant Response
<p><i>Letter dated 27 August 2019:</i></p> <p>In relation to parcel 1/7c, this is the only link to a stream to the north of the development site within Hellens Land Ltd control. We have undertaken an initial flood risk assessment on the proposed development site and we foresee the connection for the surface water drainage. Timings of the DCO being on site and our proposed timing for delivery of the housing development could potentially clash and therefore this parcel of land being permanently acquired by Highways England would impact upon our connection point – the lack of a connection point for surface water drainage out with our control could have major cost implications for the development. We strongly object to the whole of this parcel of land being permanently acquisitioned unless we retain rights to connect into the water course currently within our control.</p>	<p>The Applicant agrees in principle to the provision of rights to allow connection into the tributary of the River Don in plot 1/7c should Hellens secure consent for their development site from the relevant authorities and approvals from the Applicant on ensuring the safety and efficient operation of the strategic road network. The Applicant notes that on completion of construction, the ownership of plot 1/7c will be transferred to South Tyneside Council. The Applicant will consult with the Council to agree the necessary provisions are acceptable.</p>
<p><i>Letter dated 27 August 2019:</i></p> <p>Parcel 1/7b is land further within our control that is proposed for temporary acquisition. Highways England taking control of this parcel of land will have a major impact on delivery of the proposed housing scheme – it will dictate the phasing of the development site and also the sale of the land to a housebuilder.</p>	<p>Noted. The Applicant will continue to meet with Hellens and the Natrass family to minimise the impacts of temporary possession of plot 1/7b so far as reasonably practicable. The Applicant would refer to its comments concerning the Local Plan, and the notification of development above in this context</p>
<p>Environment Agency</p>	

Extract	Applicant Response
<p><i>Letter dated 27 August 2019:</i></p> <p>Statement of Common Ground</p> <p>The Environment Agency have reviewed the draft Statement of Common Ground (SoCG) submitted by Highway England, and have no objection in principle to the content of the SoCG. The comments included in the draft SoCG broadly take account of our discussions and written representations. However, we have requested further information regarding the abandonment of outfall 4 and its potential impacts.</p>	<p>The Applicant has submitted a draft SoCG with the EA and believes there are no impediments to having this finalised in due course. The Applicant has provided the EA with further information regarding the abandonment of outfall 4 and believes the issue is now resolved.</p>
<p>IAMP LLP</p>	
<p><i>Letter dated 23 August 2019:</i></p> <p>2.1 We have been liaising with Highways England to reach agreement on a range of matters relating to construction, such as temporary topsoil storage within the boundary of IAMP TWO, Highways England's tie in to the A1290 as widened by IAMP ONE, and the management of construction traffic. Those discussions are positive.</p>	<p>The Applicant will continue to work with IAMP LLP, reviewing the combined delivery programmes to ensure that the schemes can be delivered efficiently whilst minimising disruption. The Applicant remains confident that early design coordination meetings have resulted in a design which is compatible with the IAMP developments.</p>
<p><i>Letter dated 23 August 2019:</i></p> <p>3.2 HE is working with us on a plot-by-plot analysis for areas where the footprints of IAMP TWO and the DLJ project overlap. We expect to be able to refer to that within our emerging statement of common ground.</p>	<p>The Applicant will continue to work with IAMP LLP, reviewing the combined delivery programmes and land assembly to ensure the most efficient delivery of both the Scheme and IAMP developments. The Applicant will further review the interaction of land assemblies with IAMP LLP as they prepare their application for consent.</p>

Extract	Applicant Response
<p><i>Letter dated 23 August 2019:</i></p> <p>4.1 One outstanding matter relates to a drainage attenuation pond which Highways England has identified within the south-east corner of the IAMP TWO site, close to the Washington Road footbridge across the A19, to service the DLJ scheme.</p> <p>4.2 The proposed attenuation measures are in a similar area of the IAMP site to drainage attenuation measures required for IAMP TWO. This is an important area of the IAMP site, given its proximity to the NMUK plant. The further attenuation measures in this area proposed by Highways England will impact on land availability for development for the IAMP TWO scheme.</p>	<p>The Applicant is progressing the detailed design of the Scheme and will coordinate with IAMP LLP to consider options to limit the impact of drainage features on their proposals. The Applicant notes that the options being considered have also been discussed with Town End Farm Partnership.</p>