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By EMAIL & POST

18th February 2012

Dear Mr Norton

Newark & Sherwood Submission Allocations & Development Management DPD – Final Modifications

FPM4 - Housing Shortfall in Principal Villages

Para 1.28: The Allocations & Development Management DPD sets out the detail for how the vision and objectives of the Core Strategy will be achieved on the ground. The Housing Trajectory for Allocated Sites shows an illustration of how the housing identified through this document may be delivered over the Plan Period. In Blidworth and Lowdham it has not been possible to accommodate the numbers of dwellings identified in the Core Strategy due to Green Belt, flooding and access constraints. However, as can be seen from the Local Development Framework Housing Trajectory included at the end of Appendix C, the total number of dwellings identified, 15,199, is still in excess of the 14,800 required.

The amount of housing land allocated fails to meet the full objectively assessed housing needs in areas which have a significantly high demand for both market and affordable housing. There is a total shortfall of around 150 dwellings (90 dwellings at Blidworth and 60 dwellings at Lowdham). The 'excess' dwellings as alluded to in the Housing Trajectory will come from sites within Newark and cannot therefore address a specific housing shortfall outside the Newark area in the Principal Village locations.

The approach of the adopted Core Strategy is to direct development to the Principal Villages. **Spatial Policy 2 'Spatial Distribution of Growth'** specifically seeks to deliver a minimum housing requirement of 354 dwellings to Blidworth and 71 dwellings to Lowdham, on the basis that the delivery of housing at Blidworth and Lowdham is central to delivery of the vision and strategy for the District. The inability to deliver at these locations is therefore contrary to Core Strategy policy and fails to deliver the housing objectives for these areas.

Spatial Policy 4A specifically requires a small scale review of the Green Belt to be undertaken at Blidworth and Lowdham in order to meet housing requirements and **Spatial Policy 4B** specifically seeks to focus new housing and employment in the Principal Villages of Blidworth and Lowdham.

However, while it is recognised that Blidworth and Lowdham are both constrained settlements, the logical approach is to redistribute housing in line with Core Strategy policy and objectives to the other Principal Villages which have capacity to accommodate development, such as Farnsfield.

Farnsfield is a Principal Village and is required to deliver a percentage of the Core Strategy housing provision. The settlement has capacity to absorb development relative to meeting local and wider housing needs. Given, its proximity to Lowdham it could deliver a proportion of its housing requirement and as such address local housing needs and meet demands for new housing outside the Newark area.

FPM6 – Density as Flexibility

Para 1.30: There is some flexibility in the figures as they have been assessed on a basis of 30dph across the district, apart from the Newark Urban Area which has been assessed at 40dph. As part of the determination of planning allocations on these sites it is possible that both higher and lower densities may be achieved on sites as part of the design process.

In the areas outside the NUA, the Council has planned for the absolute minimum housing provision. The use of densities is not an appropriate mechanism solely to achieve flexibility in the Plan.

Whilst densities can provide an element of flexibility, it must be acknowledged that densities can go down as well as up. The Plan as it stands allocates the minimum number of housing sites considered likely to meet the minimum housing requirement. The Plan is therefore not sufficiently flexible should lower densities prevail. The Plan does not appropriately provide sufficient housing sites to meet the identified needs of areas that have significantly high demand for new homes, such as Farnsfield. The Plan is unsound and therefore not effective. To address this matter, there is a need to go beyond planning for the minimum provision and positively address the housing needs and demand in areas which have significant shortfalls. This will ensure flexibility and certainty in delivering housing in the right locations as well as positively responding to market signals and local needs. Para 14. of the National Planning Policy Framework is clear that ‘*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change*’.

FPM7 – Housing Land Supply

Para 1.31: The District Council can demonstrate 7.6 years’ worth of housing supply, as at April 2012, when taking account of planning permissions on deliverable sites and allocated sites where dwellings anticipated to come forward within five years. The five year land supply is included within the Council’s Housing Monitoring and 5 Year Land Supply Report and is updated on an annual basis.

The Council’s housing land supply position is contrived. Para 47 of the NPPF is clear that Councils should ‘*boost significantly the supply of housing*’ and ‘*identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements*’. It further states ‘*to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable*. It further states that ‘*Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans*’. A high proportion of sites included in the land supply assessment are not available now or are located within the Newark area and subject to longer term phasing plans and as such the rate of delivery over the five period is somewhat overly optimistic, if not manufactured.

The Council fail to acknowledge that the majority of dwellings with existing planning commitments are located within the Newark area where demand is not necessarily high so rate of delivery will be reflective of that low demand. As such housing supply is further constrained in areas such as Farnsfield and other Principal Villages where demand for both market and affordable homes is at its highest and in current market conditions are in greater demand. This is an unbalanced approach that needs to be positively addressed through the A&DM DPD.

It is also common practice to apply a percentage discount to the number of homes delivered on already permitted sites to reflect the fact that not all will necessarily come forward within the 5 year period. We note that no such discount is applied. Indeed, the Inspector at the Core Strategy acknowledged this approach (see Para 46 of the Core Strategy Inspectors Report).

Table 1 Newark & Sherwood Housing Requirement 2006–2026 (based on current requirement)

Housing Requirements (2006-2026)	Annual	Total	Comments
Total Requirement	740	14,800	
<u>Position at 1st April 2013</u>			
April 06 – March 2013 Completions		2517	
<i>Including 2012/13 projected</i>		(+233)	
Residual Requirement (2013/14 - 2026)		12,283	14,800 – 2,517 = 12,283
Annualised Residual Requirement (2013-2026)		945	12,283 / 13 years = 945

5 Year Land Supply of Deliverable Sites 1st April 2013 – 31st March 2018			
Annual Requirement		945	945 x 5 years = 4,725
Plus 20% buffer <i>Record of consistent under delivery</i>		1134	4,725 plus 20% buffer = 945 (4725+945=5670 / 5years) = 1134
		5,670	
Current Supply of Sites			
Extant Permissions		3500	We have applied a 10% non-implementation for sites with full and outline consent. We have also realistically assumed some sites will not deliver at the rate expected or in the 5 year timeframe given the long term phasing plans of some sites, the need to secure Reserved Matters and Sign 106 Agreements in advance of starting development.
<i>Core Strategy DPD Strategic Sites</i>		400	Sites with No Planning Permission.
<i>Site Allocation DPD sites</i>		800	Sites with No Planning Permission.
Deliverable Sites		4700	This would provide an average dwelling completion rate of 940dpa. This is very optimistic and unlikely to be achieved given NWDC at best managed an average rate of 540dpa since 2001. In this regard, 2,700 dwellings over a five period is somewhat reflective of likely achievement.
Deliverable Supply (+20%)		4.1 Years	

The trajectory includes two large scale strategic sites within the Newark Urban Area: NAP2B and NAP2C at Fernwood. Both sites do not have planning permission, yet both sites are predicted to start delivering dwellings from 2014?

This is an unrealistic position. Given the scale of the sites, totalling 3,800 dwellings, there would be at least a two year lead in time before any type of development could start. Assuming, outline and reserved matters and the signing of a S106 Agreement together with CIL was agreed in the next two years, it is likely that first completions would be 2016/17 at the very earliest. This would take out at least 500 dwellings from the supply. Even where the principle of development has been accepted i.e. on sites in the Allocations & Development Management DPD, it must be accepted that not all of these sites will deliver in the five year timeframe as some are still subject to phasing plans, masterplanning briefs and will need to overcome technical constraints before development can start on site.

In terms of whether a 20% buffer should be provided, Para 47 of the NPPF is clear that where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. Newark and Sherwood has consistently underprovided on its housing requirements. Since 2001, the average completion rate is 524 dwellings per annum against a target of 740dpa, proving a persistent under delivery of housing exists. It is therefore surprising to see that the Housing Trajectory shows an increase in even higher delivery rates of between 657dpa in 2014 rising to 1440dpa in 2017. Even at the peak of the market in 04/05, the Council only managed a completion rate of 705dpa so it is hard to digest that there is the ability to double this figure going forward.

A realistic assessment of housing land supply is shown in Table 1 which illustrates the Council has between 2.5 possibly 4 years of deliverable housing supply.

There is therefore a need to ensure a proper balance of housing sites is provided. To date, the majority of consented sites and those predicted to come forward mostly lie within the NUA and or the regeneration focus areas. This is not necessarily reflective of where people want to live and by restricting the supply of housing in areas such as Farnsfield will only further exacerbate affordable needs and restrict choice and competition in the market. Constraining development outside Newark and the regeneration areas does not allow for the proper planning of a mix of housing to meet the current and future demographic trends, market trends or the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

FPM9 – Housing Need

Para 1.33: It is proposed that a review of the full housing needs assessment will be undertaken in 2014. This will provide the context for reviewing the general and specific housing needs policies contained within the Core Strategy and this DPD as detailed in Paragraph 1.42.

The Strategic Housing Market Assessment (SHMA) provides an overview of local housing needs and should have been considered in defining housing allocations in the A&DM DPD.

In addition, a recent study of housing in Newark and Sherwood was undertaken in 2009. The Newark & Sherwood Housing Needs, Market & Affordability Study (2009) was commissioned by the Council in June 2009. The purpose of the study was to '*undertake a comprehensive and robust assessment to obtain high quality information about current and future housing needs at a local authority level and to inform the development of policies and underpin local housing strategies*'.

The study which has a shelf life of around three years or so and should have defined the housing requirement in preparing the A&DM DPD in addition to the strategic policies set out in the Core Strategy.

As an example, the study confirms there is a specific need in Farnsfield for around 168 dwellings to meet market housing demand alone. In addition, there is an additional need for 179 dwellings to meet the needs of both concealed and existing households that require affordable homes. Together, the local needs/demand for Farnsfield is in the region of 357 dwellings. Whilst the scale of need/demand is unlikely to be met in full, it must be recognised that the proposed allocation to provide only 105 dwellings is far short of meeting the full and objectively assessed needs of Farnsfield.

If the Council has failed to acknowledge the housing needs assessment this time round, how can there be any certainty that the real housing issues will be addressed when the Plan is reviewed in 2015.

FPM313 Housing Shortfall in Lowdham

Proposed Para 4.5 acknowledges it is not possible to accommodate the amount of housing development as required by the Core Strategy at Lowdham. It further states the requirements will be met elsewhere in the district stating that a residual requirement for the A&DM DPD to identify sites that are capable of delivering 60 new dwellings in Lowdham. In this regard, a sound approach is to redistribute an element of the shortfall at Lowdham to Farnsfield onto Alternative Site Fa/AS/2.

FPM314 Housing Shortfall in Blidworth

Proposed amendments to Para 6.24 acknowledges that it is not possible to accommodate the amount of housing development as required by the Core Strategy at Blidworth. It further states the requirements for growth will be met elsewhere in the District. In this regard, a sound approach is to redistribute an element of the shortfall to Farnsfield onto Alternative Site Fa/AS/2.

FPM331 – Housing Allocation at Farnsfield

Land to the east of Ridgeway and Greenvale is proposed for allocation of 35 dwellings. There is no certainty on delivery and access is said to be subject to ransom strips between the site and the existing public highway. In addition, access is *via* an already constrained residential road network. The Site is not the most suitable/sustainable when considered against reasonable alternatives.

FPM332 Mixed Use Allocation at Farnsfield

Land to the west of Cockett Lane is proposed for allocation of 70 dwellings 0.5ha of employment development. It is submitted that the Council's allocation of Fa/MU/1 is not the most sustainable site when considered against the reasonable alternatives. In identifying Policy Fa/MU/1, the Council inherently fails to acknowledge key planning issues which may impact on delivery of the site. The visual impact has not been assessed and given the elevated position of the site and the subsequent impact it would have on the landscape, particularly at night when street lighting is dominant; the issue of unstable land due to the nearby quarry; the proximity to SINC and potential impact on protected species / habitats which may be adversely impacted upon, particularly from proposed employment generating uses, distance from local services and amenities and the major infrastructure works required to service the site, which will no doubt impact on viability given the sewerage network would require upgrading.

In terms of the proposed mixed use allocation, there are issues surrounding the implementation and masterplanning of the site in respect of employment and residential land components. Buffers will no doubt be required between land uses, the scale or quantum not yet known. A buffer is also likely between the SINC and new development, again the scale or quantum is unknown and as such as in both

cases the net developable area could be significantly reduced. Access is contrived in that it appears that one access point at the southern end of the site off Cockett Lane is proposed. Whilst theoretically sound, the implementation of such a proposal would likely result in a drawn out process at Planning Application stage, particularly if the LPA require the delivery of employment land linked to the delivery of residential elements of the scheme. There is no doubt that these matters need addressing in the first instance to avoid uncertainty and additional delays in delivery of housing at Farnsfield.

Concluding Points

In the interests of shaping well-planned environments and deliver sustainable development, HSL requests that the Inspector considers the above implications in assessing the overall soundness of the DPD and moreover how the reasonable Alternative Site Fa/AS/2 (where supported by the SA) can in particular address the current housing shortfall in rural areas (i.e. as acknowledged in Final Proposed Modification 313 and 314 which refer to shortfalls of 60 dwellings at Lowdham and a further 50 dwellings at Blidworth).

Given the NPPF seeks to achieve increased flexibility for delivery of rural housing to reflect local needs, the inclusion of Alternative Site Fa/AS/2 as supported by the SA will address both a locally identified need/demand (*see Para 4 of HSL Examination Hearing Statement to Matter 5 (19) Southwell Area (Representor ID: 141)*) as well as an overall district wide shortfall – thereby providing certainty and the required flexibility over the Plan period to deliver much needed housing outside the Newark urban area.

Proposed Changes

The National Planning Policy Framework places a presumption in favour of sustainable development at the heart of the planning system. In regard to sustainable locations for growth, the Core Planning Principles in the NPPF state that planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (para 17 – Principle 11). This core planning principle underpins and reinforces the preeminent role Site **Fa/AS/2** should properly play in the sustainable expansion of Farnsfield, as already set out in written evidence. It is the foremost sustainable direction of growth in relation to the form of the existing village centre and its facilities, and access from Southwell Road provides a robust solution that would avoid traffic conflicts in congested neighbourhood streets and would allow expansion for the village to the east for the DPD period and the foreseeable planning future.

Furthermore, whilst stating that local development plans must aim to achieve the foremost objective of sustainable development (paras 14 and 49), the NPPF requires housing allocations to be based on full objectively assessed housing needs of the area and encourages local planning Authorities to significantly increase the supply of housing (para 47) and to include an additional allowance of at least 5% in their five year housing land supply of 'deliverable sites'. It is therefore clear that the strategic sustainable direction of growth for the settlement is a matter of policy on which a Local Plan should very clearly identify and define, and that in the case of the DPD for Farnsfield, the Council has failed to have sufficient regard to the most sustainable direction of growth of the settlement. It is important that the opportunity is taken by the Inspector to set the sustainable planning context for the growth of Farnsfield and matters are clarified within the DPD.

It is therefore submitted that Site **Fa/AS/2** remains and is on balance clearly the most sustainable direction of housing growth for Farnsfield, for the reasons stated in earlier written evidence which are not repeated here. The inspector is accordingly requested to include Site **Fa/AS/2** as an allocation for residential development in the DPD.

The inclusion of Site **Fa/AS/2** in the DPD would accord with the available evidence in terms of identifying the most sustainable housing site and would help meet the full and objective housing needs of Farnsfield rendering the plan sound.

Fa/AS/2 has already been subject of sustainable appraisal, meaning that its allocation in the DPD would not require further public consultation or Sustainability Appraisal. There would accordingly appear to be no procedural restriction on the Inspector allocating site **Fa/AS/2**, with no requirement for further public consultation or delay.

Attached is a development principle brochure which outlines the sustainable credentials of Fa/AS/2.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul O'Shea', written in a cursive style.

Paul O'Shea BA (Hons) PGdip TP MRTPI
Land & Planning Manager
On behalf of Hollins Strategic Land

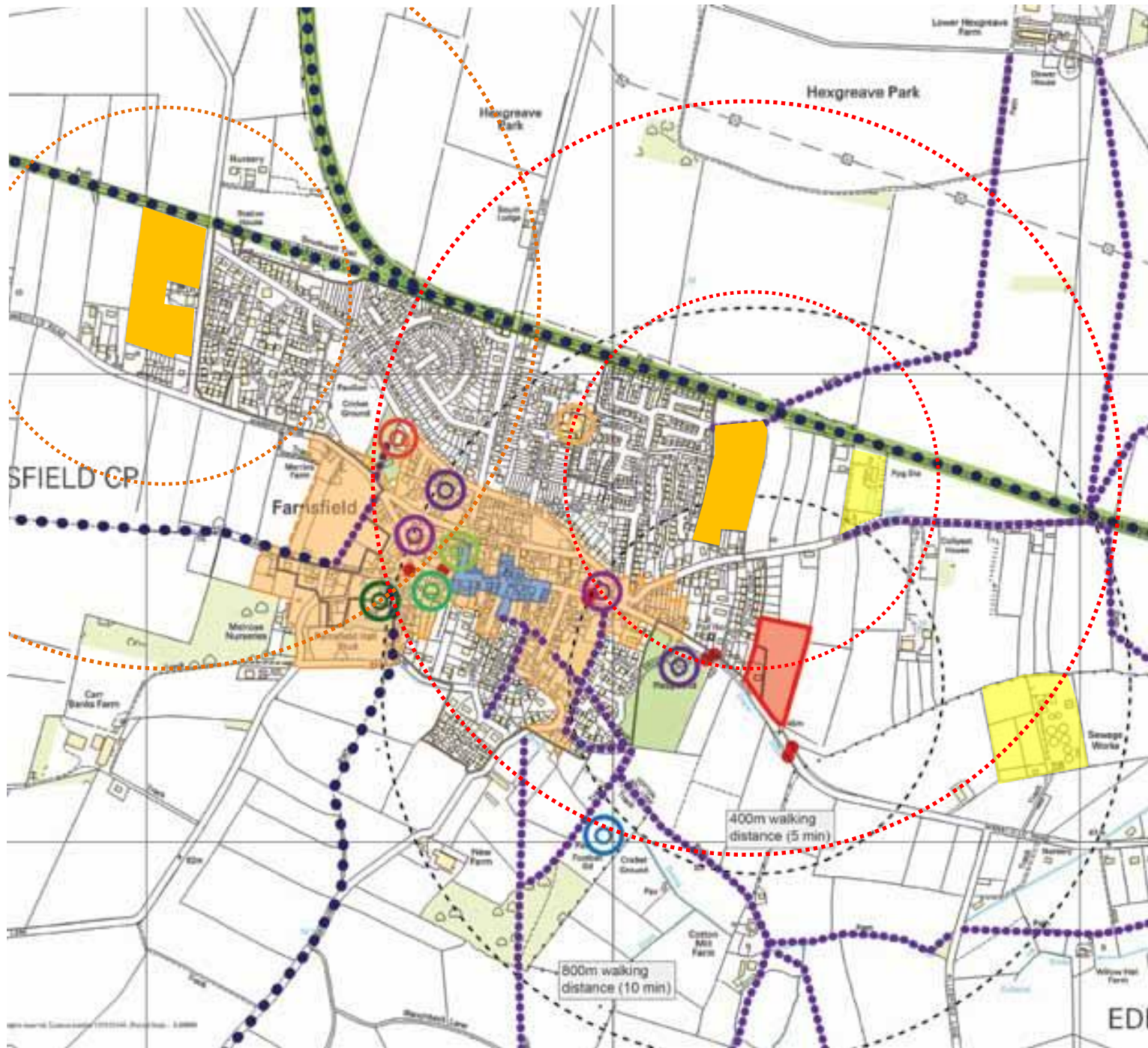
Enc. Land at South Southwell Road, Farnsfield – Development Principles Document (Dec 2012)
Sustainability Plan – Farnsfield

Land North of South Lane, Farnsfield

Fig. Farnsfield Conte

KEY

- Site boundary
- Village centre
- Conservation Area bound
- Existing built area
- Walking distances
- St. Michael's Church of E
Primary School
- Library
- Church
- Village Hall
- Farnsfield Health Centre &
Pharmacy
- Playing Fields
- Playground
- Public Open Space
- Public House
- Public Right of Way
- Southwell Trail/ National 1
(LNR/SINC)
- Bus Stop



EDI

Land at Southwell Road Farnsfield

December 2012

BroadwayMalyan^{BM}

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Introduction

Purpose of this submission

This submission has been produced on behalf of Hollins Strategic Land (HSL) by Broadway Malyan and seeks to highlight the availability, suitability and deliverability of land north of Southwell Road, Farnsfield for high quality residential development. In addition, it sets out initial principles for residential development that contributes to the sustainable future of Farnsfield.

About Hollins Strategic Land

HSL is a leading facilitator of delivering residential and mixed use development. The team is committed to understanding, foreseeing and overcoming all matters associated with development projects from conception to delivery. HSL adopt a 'hands on' contemporary and enthusiastic approach to formulation of 'bespoke' strategies that are aligned to local matters in order to deliver sustainable development in local communities. HSL is about delivering neighbourhoods where people are proud to live in.

This Site

HSL control 1.9 Hectares (4.7 Acres) of land on the eastern edge of Farnsfield, Newark and Sherwood District. The site has capacity for up to 50 homes. The site is being promoted by HSL for high quality residential development as part of the proper planning and sustainable development of Farnsfield and the wider area.

Site Description

Site Description

The site abuts the eastern edge of the existing built area of Farnsfield of which Broadlands curtilage lies within the existing settlement boundary. It is flat land that is well contained by established field boundaries and lies within a lower lying, less prominent area away from high ground to the west, south and north-east of the village.

The western boundary of the site abuts existing residential properties which form part of the existing built area of Farnsfield. The northern and eastern boundaries are defined by established field boundaries.

To the south, the site fronts on the Southwell Road, which links the site to the centre of Farnsfield, some 500 metres to the west and Southwell to the east. There is also the opportunity to link the site for pedestrian and cyclists through to Nether Court and from there on to the Southwell Trail.

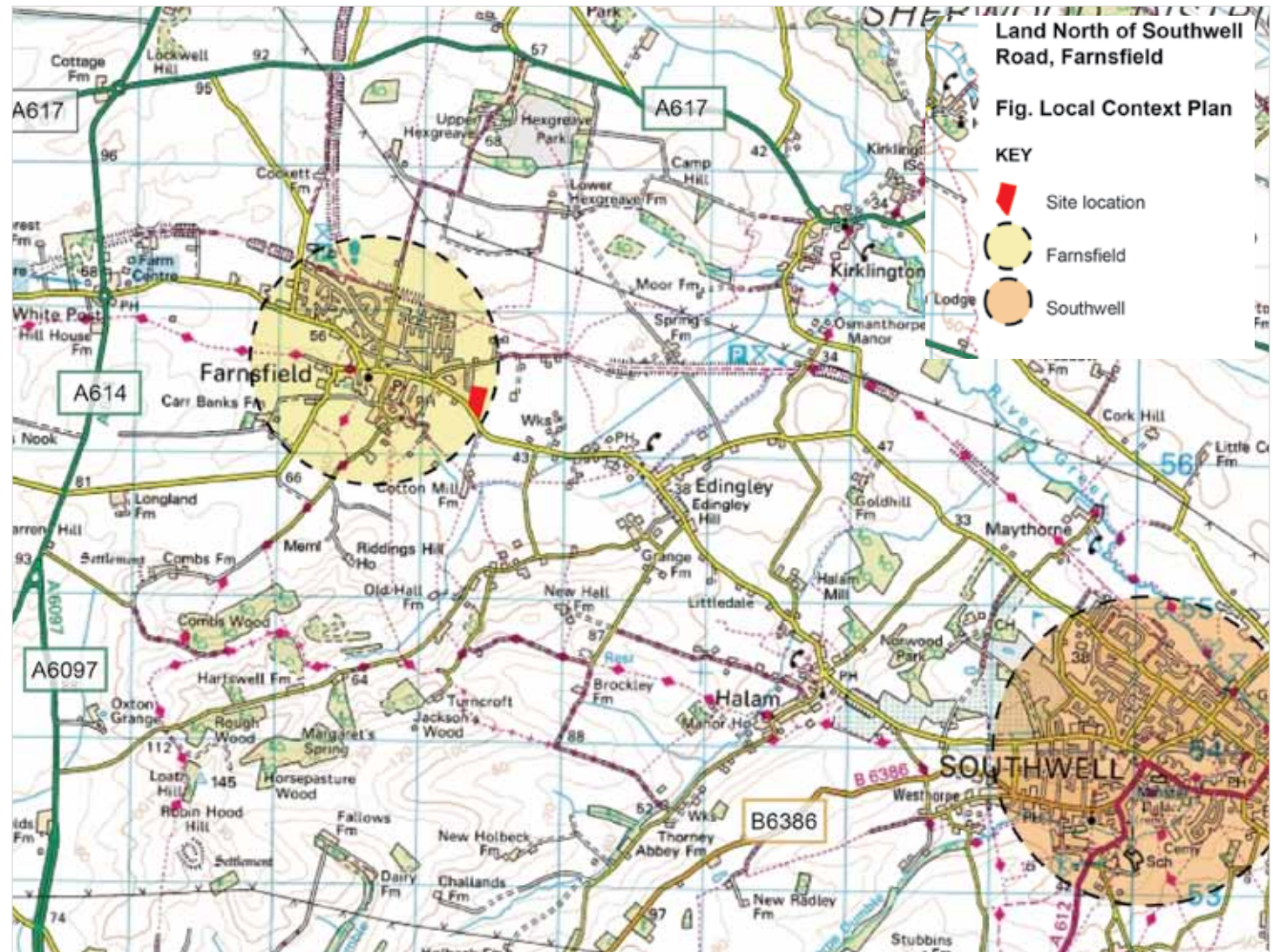


Site Context

Local Context

Farnsfield is sizeable settlement with a good range of local services including a primary school. The local population is around 2,800. The settlement is within 7 kilometres of Southwell the local 'Service Centre'. The settlement has good access to the strategic, regional and local road network, notably the M1 and A1 and thereby the regional centres including Nottingham. It is a popular place to live as noted on farnsfieldvillage.org.uk a local website:

'...it is a bustling dormitory village for mainly professional workers in the surrounding towns of Mansfield, Newark and Nottingham. Housing is a good 10 - 20% more costly in Farnsfield than the surrounding former mining towns of Blidworth, Rainworth and Bilsthorpe and attracts the higher prices because of good education and the attractive village scene. The village is gradually growing old and is well placed to accommodate less mobile residents as it still has a good compliment of shops including its own bakery and butcher.'



Farnsfield Context

Farnsfield is classified as a Principal Village. The settlement is well served and accessible to a range of local services and facilities. It provides health services, education, leisure and local shopping for the local population. The settlement is also served by public transport with regular bus services to Southwell and Newark (approx 40 mins) and Mansfield (approx 45 mins).

The site is within 10 mins walk of most services and facilities and under 5 mins walk to play facilities.

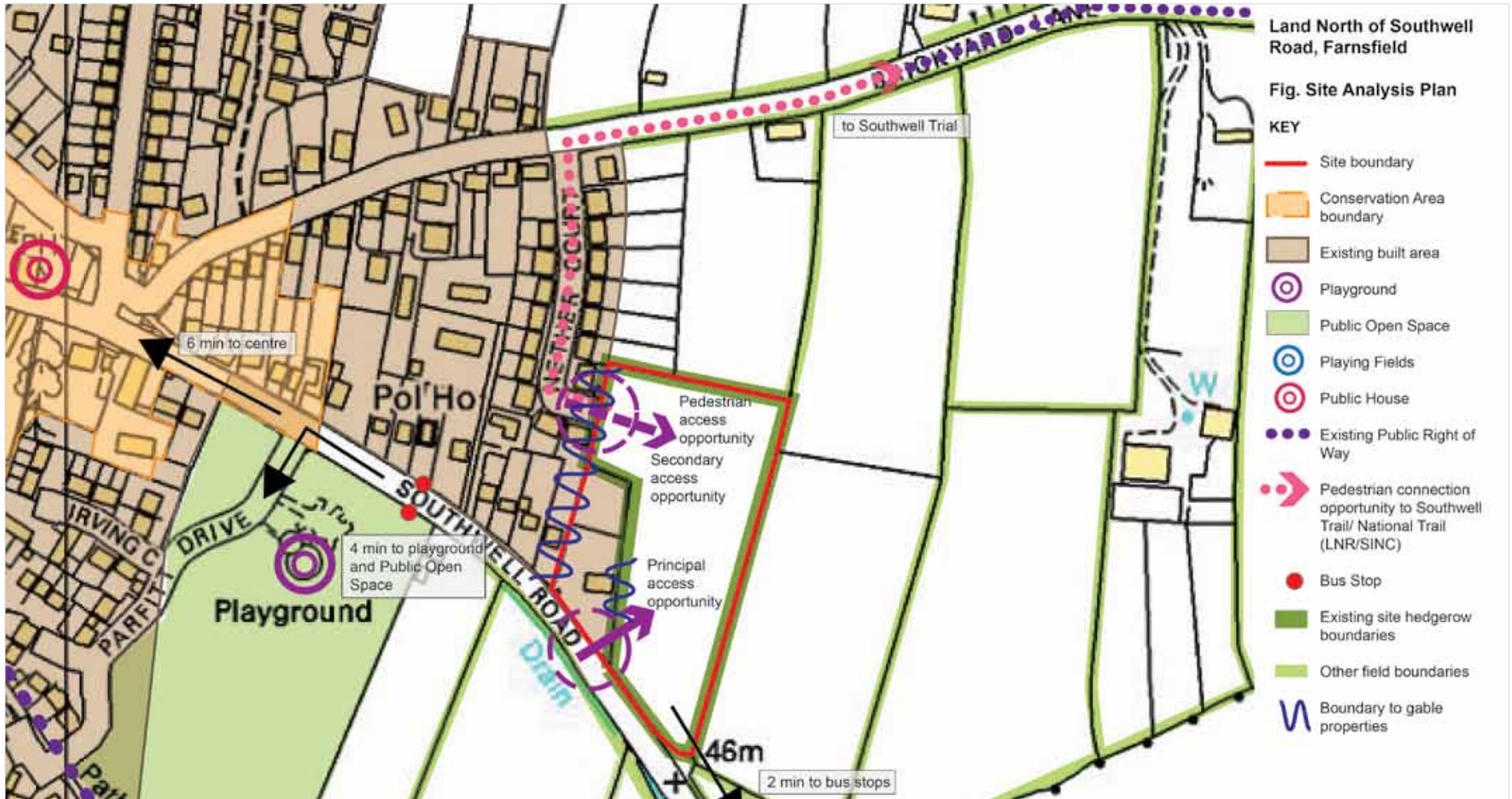
There are two bus stops either side of the site, both of which are under two minutes walk.

The local centre is around a 7 min walk away.

The site is therefore a highly sustainable location in terms of accessibility to local services and amenities.



Site Analysis



Site Analysis

The eastern side of the village is less visually prominent than higher areas to the south and north west of the settlement as illustrated in the adjacent Topography Plan. The site adjoins existing residential areas to the west, but given the orientation of these existing properties the site is not overlooked.

The site has substantial road frontage along Southwell Road. It is likely that primary access will be from Southwell Road. Secondary and/or pedestrian cycle access may be achievable from Nether Court. This links through to Brickyard Lane and from there to the Southwell Trail, a major leisure and ecology resource in the Southwell area.

Overall, the site is a constraint free greenfield site on the edge of Farnsfield with well defined boundaries. It is the least sensitive site in visual terms.



Delivering Growth to Farnsfield and Southwell

The thrust of Government guidance is the presumption in favour of sustainable development. The National Planning Policy Framework (NPPF) (2012) provides a set of core land use planning principles that should be used to underpin both the plan-making and decision-taking process. Within the context of allocating land for housing, it encourages LPAs to 'actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'. The site is in a sustainable location being within walking distance of key services and facilities serving a sustainable, vibrant community.

Delivering a Wide Choice of High Quality Homes

Section 6 of NPPF seeks to boost the supply of housing. Council's should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. To be considered deliverable, site should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular development of the site is viable. The Site is capable of delivering high quality homes and help boost the supply of housing in the shorter term. It is available now, suitable, achievable and ultimately deliverable now.

Availability

Hollins Strategic Land is actively promoting the Site for residential led development. The land is available for development in the short term.

Suitability

The site is contained and well related to the existing settlement area with firm and defensible boundaries. New development would deliver a robust settlement boundary at Farnsfield in a manner that would not harm the character of the wider open countryside. Given the site's location, on the eastern edge of the settlement, the impact of a new residential development on the surrounding area would be very low, especially when compared to the more visually prominent and elevated western edge.

There are no known constraints that would restrict development. In policy terms, the Site is not of landscape, ecological or heritage value.

There are no sites of biological importance, protected trees, conservation areas or listed buildings on the site. There are therefore no constraints in respect of the suitability of the site for development.

Achievability

It is considered that residential development on the site would be achievable within five years due to its sustainable location close to existing infrastructure and the fact it is being promoted by a developer seeking to deliver housing. Access can be achieved from Southwell Road with minimal disruption to the local community. All necessary services are deemed available.

In addition to the good local road network, the site benefits from being served by a local bus route and it is in proximity to local facilities and services by bicycle or on foot, including the local primary school. It is therefore considered that the area would meet the needs of new residents occupying the development.

Deliverability

The Site is available for development in the short term. It offers a suitable location for development now. Initial assessment of the site indicates there are no known constraints which would suggest there are any insurmountable barriers to physically developing the Site or its satisfactory operation once developed. Residential completions are achievable from 2013/14, subject to securing the necessary planning consent.

Contact Us

HSL is committed to delivering high quality homes on a site that is within walking distance of key local facilities and services and which protects the countryside setting.

HSL will engage with the necessary stakeholder's and decision takers and respond to local issues in a pragmatic and realistic way.

This submission is very much part of HSL's commitment to a more collaborative approach to the development process.

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