## Melton Local Plan Examination Hearings: Inspector's Matters, Issues and Questions: Matter 4 Question 5.1 (ii) and (ii)

This submission has been prepared further to the Programme Officer's email of 17<sup>th</sup> November 2017, requesting further statements in connection with the Inspector's matters and questions. McGough Planning acts for the Ovens Family; the owners of land off Church Lane/ Ashby Road, Gaddesby (formerly identified as GADD2 in the Pre- Submission draft of the local plan) -appendix 1: a location plan showing the extent of our clients' ownership.

#### 1.0 Background

- 1.1 The Ovens Family own 8.6 hectares of land situated on the eastern edge of Gaddesby, Off Ashby Road. The land is currently used for grazing animals and bordered by houses on the west and (partially) southern edges, with an existing entrance off Ashby Road situated opposite the local primary school.
- 1.2 Following an initial contact with Melton Council's planning policy team in August 2013, officers confirmed that no sites in Gaddesby had been considered as part of the SHLAA at that time, but that the Council would be looking for sites as they start the new Melton Local Plan. In September 2013, officers confirmed a new call for sites would take place shortly, then on 6<sup>th</sup> November, a call for sites submission was made for the whole site to be considered for a future housing site in the upcoming local plan process.
- 1.3 On 27th March 2014, following a number of requests, officers confirmed that the SHLAA assessments were taking longer than envisaged but hey hoped to have them completed in the next couple of weeks.
- 1.4 On 9<sup>th</sup> June 2014, we requested an update from officers in respect of the call for sites submission. They replied on 10<sup>th</sup> June, confirming "your site MBC/016/13 is in the 2013/14 SHLAA and will continue to be assessed each year as part of the preparation of the new Melton Local Plan".
- 1.5 On 3rd May 2016, the Council emailed asking for the "Potential Development Site Proposal Form" to be completed. This was completed, returned and acknowledged on 5<sup>th</sup> May.
- 1.6 On 22<sup>nd</sup> July 2016, the Council emailed once again, seeking further information in answer to the following questions:
  - ". Is it the intention to develop the site?
  - · What are the expected timeframes and is there an expected start date for construction?
  - · Is there a developer on board or is the site being marketed?
  - · Are there any technical constraints (e.g. ownership of land, highway access, drainage, flood risk etc.) that would affect delivery?
  - · If there are technical constraints, have any technical studies or work been carried out to address the issues?"

Our response confirming our clients' intention to develop, timeframes, etc. was emailed

- back on 25<sup>th</sup> July. The officer emailed back on 27<sup>th</sup> July confirming receipt and that the next consultation draft of the local plan would be ready around September.
- 1.7 On 7<sup>th</sup> November 2016, the pre-submission version of the local plan was issued for consultation. This version of the plan included two hectares of our clients land off Ashby Road as a housing allocation for 30 dwellings Appendix 1 ref GADD2.
- 1.8 On 25<sup>th</sup> January 2017, officers emailed asking for the form "Information on the Deliverability of Sites Update November 2016" to be completed. The completed form providing further details on deliverability and availability was sent back and acknowledged on 9<sup>th</sup> February.
- 1.9 Having not heard from officers for some time, on 31 May 2017, we asked the Council to confirm if there had been any representations in respect of our client's site (GADD2), to ascertain if there was any further information that could be provided. Officers chose not to respond
- 1.10 On 30<sup>th</sup> June 2017, as part of our checks of the Council's local plan website we discovered that officers had changed their view and were now seeking to recommend our clients site's deletion as a housing allocation. The site had received objections from local residents, Leicestershire County Council's Archaeological Service (LCAS) and Historic England. Council officers did not seem swayed by the objections from the residents and LCAS, putting forward counter arguments for each, but then chose to accept verbatim the views of Historic England and, to our clients astonishment, effectively "throw the towel in" on the original GADD2 allocation. Officers recommended the site's removal as a housing allocation in a report to Council considering the responses to the consultation on the pre-submission draft in November 2016.
- 1.11 We emailed the officers seeking details of the objections that had changed their views on the site on 30<sup>th</sup> June, asking for an urgent meeting to discuss the deletion of GADD2, if for no other purpose than to begin to try and establish whether there was any scope for common ground.
- 1.12 On 3<sup>rd</sup> July 2017, an officer emailed a response assuring the Council would consult on the changes to the local plan providing "the opportunity for you to respond to its revised content and all comments made will go forward to the Inspectorate alongside the Plan itself, to be considered at the Examination". The officer also confirmed they "would be happy to meet and consider the statement of common ground, however this would need to be a bit later, after the submission in preparation for the Examination".
- 1.13 On 4<sup>th</sup> July 2017, the Council approved the officers' recommendation to delete of our client's site's housing allocation as part of the focussed changes to the local plan. The officers committee report provided a useful summary.
  - At Paras 3.22.1 3.22.3 "It is proposed to remove site GADD2 from the site allocations

after a large number of objections from both residents and Historic England who objected strongly to the proposal. Its allocation would have a significant impact on the setting of heritage assets and it may not be possible to appropriately mitigate impact on landscape character, and as such, it cannot be considered suitable for development. A small replacement site to the north of the village is proposed, with site specific wording to ensure it is developed appropriately. Other concerns raised related primarily to the amount of growth proposed, existing highways issues, lack of public transport, village services and facilities, and impact of development on environmental factors, such as flood risk. It is recommended that GADD 2 is deleted; insertion of new site to become GADD3, former GADD3 to become GADD2";

and

- At para5.7.1 "Further information has been received in respect of previous site GADD2, Land off Church Lane and Ashby Road, Gaddesby, in terms of impacts on landscape character and significant heritage assets. Historic England have registered objection to the allocation of the site due to the fact they consider that development of that particular site could not be mitigated for or designed in such a way to limit detrimental impact on the setting of the Grade I listed Church of St Luke and the historic landscape setting around it which comprises of earthwork remains of medieval and later cultivation. Therefore, the site assessment has been updated to take this into account and it is now considered in light of this information that the site is no longer considered suitable for allocation. It is therefore 15 suggested that this site is removed from the site allocations under policy C1(a)".
- 1.14 On 24<sup>th</sup> July, the Council published and consulted on the focused changes. The consultation closed on 23<sup>rd</sup> August 2017.

#### 2.0 Response in relation to Matter 5.1 (ii) and (iii)

- 2.1 In our consultation response, we objected to the deletion of our client's site, which was principally a result of representations received from Historic England (HE) and Leicestershire CC Archaeological Service (LCCAS).
- 2.2 On the basis of HE/ LCAS' objections, officers carried out reassessment of our clients' site. This is set out in various documents, including the Rural Hubs Update document (Rural Hubs Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales Part 3 of 3 30th May 2017), which can be summarised as follows:

"The original site submitted (8.6ha) was reduced to the site area identified above (2ha) to lessen the impact on the character of the settlement and the landscape. The southern area (off Ashby Road) was identified as the best option due the potential access constraints at the north of the site (off Church Lane). The south-eastern corner of the site is within flood risk zone 3b (0.16ha) and therefore was removed from the developable area. The capacity was reduced from 45 to 30 to allow for a lower density development in order to lessen the impact on the character and setting of the village. However, impacts identified in the Landscape Character Assessment and further reinforced by the representations received from Historic

England mean that it is now suggested to remove this site from the allocations as it is not considered the detrimental impacts can be adequately mitigated."

- 2.3 As a result of the officers' reassessment, our clients instructed *Asset Heritage Consulting* to provide heritage and landscape advice in relation to their site and specifically to examine and respond to Historic England's/ LCCAS views. This is set out in the attached letter from Dr Nicholas Doggett (see appendix 2), the founder of Asset Heritage Consulting and an expert on heritage issues.
- 2.4 Dr Doggett carried out a thorough heritage assessment of the site itself, the church and churchyard. His assessment also looked at the village of Gaddesby as a whole and the surrounding landscape. In relation to the potential impact on the listed church Dr Doggett concluded, "I can see no justifiable or sustainable ground for removing GADD2 as a housing allocation on the basis that it would have any adverse impact on the setting of St. Luke's Church as a Grade I listed building."
- 2.5 In relation to the landscape impact, Dr Doggett concluded, "there is no legitimate reason why the District Council should regard the presence of unprotected earthworks, associated with either ridge and furrow ploughing or the later (Victorian) steam ploughing system, as a justifiable ground for not allocating GADD2 as a housing site."
- 2.6 Our expert heritage advice was clear; the development of our clients' site would have no detrimental impact on the setting of the listed church or the features in the landscape that officers are now looking to protect. Moreover, it would appear that the sites that officers sought to allocate instead had similar impacts to our clients' land, the only difference being in our client's case it resulted in their site being recommended for de-allocation. This is a clear example of the Council's methodology being applied inconsistently.
- 2.8 In our view, officers appeared to have reached the decision to recommend de-allocation on the basis of incomplete and/or inaccurate evidence. The presentation by officers of a recommendation based on poor evidence then led to the Council making it unjustified decision to agree with the proposed de-allocation. It shows the reasons for selecting some sites and rejecting others is far from clear, as well as being completely insufficient.
- 2.9 On 27<sup>th</sup> September, a report on the consultation responses to the focused changes was considered by Melton's full council. The agenda included the Officers' response to our clients' objection to the deletion of their site; now identified as GADD 4 (but formerly known as GADD2), as part of the focused changes consultation.
- 2.10 As we understand it, Melton Council's agreed position on our clients' site and representations is that set out at page 1 of Item 3b Appendix 1 (d)(viii) site specific policies, which reads as follows:

"Conservation supports HE's view with regards to its objection for the allocation of 30/40 houses at GADD2, however in line with additional responses for further allocations at present, it recognises the opportunity to mitigate the impact of the new dwellings through carefully considered design. There are well preserved ridge and furrow earthworks in this

location (medieval and later C19 industrialised) and they would be significantly disrupted by the development. However, Conservation does not consider this to be sufficient justification alone to withdraw the allocation, as Borough of Melton has one of the largest and well-preserved remains of medieval earthworks in the country, and there are a wide number of further allocations that have been included that will involve development on such historic earthworks. However, cumulatively, the impact on the setting of the church and the historic earthworks are considered to cause harm, although Conservation considers that this may be possible to mitigate through well considered design and ensuring static views to the church are not impacted upon. The issues of kinetic views is more difficult and Conservation defers to HE in its assessment of this impact."

- 2.11 We emailed officers on 12<sup>th</sup> October agreeing with the Council adopted position, i.e. it is possible to mitigate the impact of the site's development on the listed building and earthworks "through well considered design". We submitted a townscape/ visual analysis of the site and plans of one such proposal that demonstrated very clearly how this can be achieved (his is attached at appendix 3).
- 2.12 We pointed out to officers that had our clients' known of Historic England's concerns following our request for an update on 31<sup>st</sup> May 2016, we would have produced a visual analysis at that point. Whilst it is entirely possible that the Council may still have decided to delete the site, we contend they would have done so based on appropriate evidence and from a more informed view-point. We closed by seeking a meeting to discuss the appraisal or (at least) try to agree common ground
- 2.10 On 8<sup>th</sup> November, having not received a response, we emailed again, trying to arrange a meeting to agree common ground, and, on 9<sup>th</sup> November, officers emailed declining our request to meet.
- 2.11 For completeness, we have also tried to meet with Historic England to discuss their objections to our site and they finally declined by email on 20<sup>th</sup> December 2017.

#### 3.0 Summary

- 3.1 Our clients have found their first experience of the local plan process to be confusing and frustrating. They submitted their land for consideration as part of a call for sites and failed to get any response from the Council until they find their submission had been partially successful i.e. part of their land was recommended for a housing allocation I a draft local plan. Officers relied solely on their own experience and assessments, which showed our clients' land was a good housing site. These assessments included an assessment of the impact of the site's development on the nearby listed building and the surrounding
- 3.2 In spite of requests, there was no contact from officers to discuss the details of how the site could be developed. Our clients were content to rely on officers contacting them for information as and when they needed any. Even so, we kept trying to make contact to

- ensure officers understood that they had sufficient site information to come to an informed view.
- 3.3 However, following objections from Historic England and LCAS, our clients subsequently learned officers had changed their minds had recommended their site be de-allocated. Officers carried out further assessments using the same methodology as before, but, paradoxically, arrived at a very different conclusion i.e. our clients land was not suitable for housing development. Despite requests for updates, we learned of all this only just before the focused changes were about to be reported to committee in July 2017.
- 3.4 It should be noted that officers were largely concerned with the objections of Historic England and the LCAS and changed their site assessment scores to reflect the objections. The concerns raised by residents in relation to traffic, impact on village character etc. did not alter the officers site assessment scores. Accordingly, the matters raised by residents have not been addressed as part of our clients' case.
- 3.5 Attempts to provide officers with more robust and detailed appraisals/ evidence (Dr Doggett's report at appendix 2 and our submissions in relation to the site assessment process) proved fruitless. We are not even sure if this evidence was ever considered at all.
- 3.6 On 27<sup>th</sup> September 2017, Melton's full council clarified that the site was being removed because of the potential impact on the listed building (having accepted the landscape concern was not sufficient grounds alone to withdraw the allocation), but accepting that there might be ways "to mitigate harm through well considered design". This compounded our clients' frustration. Despite numerous and repeated requests to officers to meet to discuss the site to agree what further information might needed to complete their assessment, our clients were never given the opportunity to provide a scheme that could have demonstrated what the Council agreed to. One was provided on 12<sup>th</sup> October and council officers (and Historic England, as well) have so far declined to offer any views.
- 3.7 We considered the experience of our clients demonstrates the Council has failed to apply its site assessment methodology consistently. They have also have accepted evidence that was incomplete and failed to properly consider other evidence that contradicts the view of Historic England. Had they done so, it is possible that our clients site's housing allocation would have remained intact.
- 3.8 The Ovens family wanted us to express their unhappiness about having to take up the time of the examination to deal with matters that could have been dealt with through discussion with officers. We can also confirm the repeated invitations to agree common ground have been met with no response, although officers (and Historic England) did eventually decline our invitations.

3.9 Our clients ask the Inspector rectifies the errors that resulted from the way the officers brought about de-allocation and re-allocates their site for housing, as it was shown in the pre-submission draft of the local plan.







#### specialist independent advisers in the historic built environment

conservation & listed buildings I heritage planning matters I expert witness I audits I research listed buildings I conservation management and advice | archaeology | historic interiors

#### By e-mail only

Chris McGough McGough Planning Consultants Ltd. 10 Ambassador Place Stockport Road Altrincham WA15 8DB

21 August 2017

Our ref: ND/9603

Dear Chris,

# RE: Land off Church Lane and Ashby Road, Gaddesby: Proposed allocation for 30-40 houses (GADD2) in the Melton Mowbray Local Plan

I am writing following my instruction from the Ovens family to provide them with heritage advice relating to the above, with specific reference to the objections raised by Historic England and Leicestershire County Council Archaeological Service (LCAS) to the potential allocation of the above site in Melton Borough Council's emerging Local Plan. This instruction will include giving evidence to the Local Plan Examination should this prove necessary.

I am a heritage consultant with around 35 years' experience of working in the historic environment in both the public and private sectors. Since going into the private sector in 2002, my clients have included a number of Oxford colleges and organisations such as the Bournville Village Trust, The Ministry of Justice, the Universities of Bristol & Coventry, and independent schools such as Abingdon School (see my qualifications and experience at Annexe 1).

My visit to the site was made on 15 August at which time I made myself familiar not only with the site itself, the church and churchyard, but also with the village of Gaddesby as a whole and the surrounding landscape.

In her comments, Emilie Carr of Historic England states that: 'The proposed allocation GADD2 will be harmful to the significance of the Grade I Church of St Luke. The church gains significance from its historic landscape setting which to

its east comprises the earthwork remains of medieval and later cultivation. Both in static and kinetic (moving) views one can appreciate the evolution of the agricultural and land allocation systems which supported the parish community and their clergy. Of particular interest are the apparent phases of cultivation between straighter steam ploughed ridges and earlier horse and oxen ploughed strips. The proposed development would not only cause direct loss to earthwork remains but would also extend the impact of existing bungalow development into main views from the east side of the churchyard and gated lane. As such, the allocation is not considered to be sound in respect of heritage assets'.

These comments are, in my opinion, wide of the mark. While I would be among the first to acknowledge the historic and architectural importance of St. Luke's Church, which clearly fully merits its Grade I listing (a status it has held since 1968), Ms Carr is simply incorrect when she implies that development of GADD2 would be visible 'from the east side of the churchyard'.

In fact, GADD2, while it is visible from parts of the 'gated lane' (really a trackway) to the south of the churchyard, is not visible from any point of the churchyard. This means that in both its existing and potentially developed form GADD2 makes no contribution to the setting of the Grade I listed church as this is perceived from within its churchyard.

As far as views from the trackway on the south side of the churchyard are concerned, it is true that GADD2 can be seen from there (as can the wider countryside beyond), but so can much of the modern development running all the way up Church Lane from Ashby Road and which now forms the immediate setting of St. Luke's Church on the main approach to its churchyard.

Strangely however, Ms Carr makes no comment about this large area of 'standard' modern development, which (quite rightly in my view) is excluded from the Gaddesby Conservation Area, first designated in 1976. Not inappropriately, this modern development is also described as 'incongruous' in the Council's own Conservation Area Character Appraisal.

Ms Carr's statement that the allocation of GADD2 for 30-40 houses would 'extend the impact of existing bungalow development into main views from the

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east side of the churchyard and gated lane' is open to different interpretations. Hers is clearly that it would be harmful, but mine is otherwise. Indeed, as I point out above, GADD2 is not visible at all from the churchyard and although from the 'gated lane' it can be seen, this is in the context of much else that is visible from here, including the 'incongruous' modern development along Church Lane that the Council itself chose to exclude from the Gaddesby Conservation Area.

With regard to Ms Carr's specific reference to 'existing bungalow development', this must be that off Ashby Road directly adjoining GADD2 as the majority of the dwellings on the east side of Church Lane visible from the trackway to the south of the churchyard are actually substantial houses not bungalows.

In this connection it is therefore perfectly reasonable to suggest that, although the allocation of GADD2 would 'extend the impact of (the) existing bungalow development' off Ashby Road, this would not be at the expense of the setting of the church. Furthermore, with careful attention to site layout, density and design at planning stage, extension of built development could actually help to mitigate the unfortunate 'incongruous' form and appearance of the bungalows and the nearby modern development along Church Lane.

In wider historic landscape terms too, the impact of 30-40 houses on GADD2 would be minimised by its low-lying location adjoining the bungalows off Ashby Road. This is important because, although the views of the tower and spire of St. Luke's Church on the descending approach to the village from the south-east along the dead straight section of Ashby Road, beyond the bridge over Gaddesby Brook to the point where Ashby Road meets Gaddesby Lane, are almost certainly accidental rather than planned, these views are nevertheless striking even in summer when trees and other vegetation to some extent obscure them.

These views would effectively be preserved if GADD2 were to be developed, as owing to its low-lying location, it falls outside the line of sight from this section of Ashby Road and would therefore not impinge upon the views obtainable on the descending approach to the village from this direction. Likewise, once the traveller from this direction is over the bridge the land is level and even the

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tower and spire of St. Luke's are less prominent in views from the road than they are from the higher ground to the south-east.

This all means that I can see no justifiable or sustainable ground for removing GADD2 as a housing allocation on the basis that it would have any adverse impact on the setting of St. Luke's Church as a Grade I listed building.

Historic England's other objection (and that made by LCAS) relates to the loss of some of the earthworks associated with the medieval ridge and furrow ploughing and later (Victorian) steam ploughing systems. This is all very well, but fails to acknowledge the critical point, an error also made by LCAS, that the earthworks on GADD2 enjoy no statutory protection whatsoever.

Ridge and furrow earthworks are plentiful in the Midlands and Leicestershire is no exception. Indeed, there are several other fields on the edge of Gaddesby that have such earthworks, including the housing allocation site on the northern side of Pasture Lane. In addition, the earthworks on GADD2 extend without a break well beyond the site's confines to the rest of the large pasture field owned by your client's family, including the portion closest to the church.

In short, there is no legitimate reason why the District Council should regard the presence of unprotected earthworks, associated with either ridge and furrow ploughing or the later (Victorian) steam ploughing system, as a justifiable ground for not allocating GADD2 as a housing site.

I hope you find these observations, which I trust demonstrate that the allocation of GADD2 for housing would not cause any harm in heritage terms, helpful in the representations you will shortly be making to Melton Borough Council on the suitability of GADD2 as a housing allocation site.

Yours sincerely

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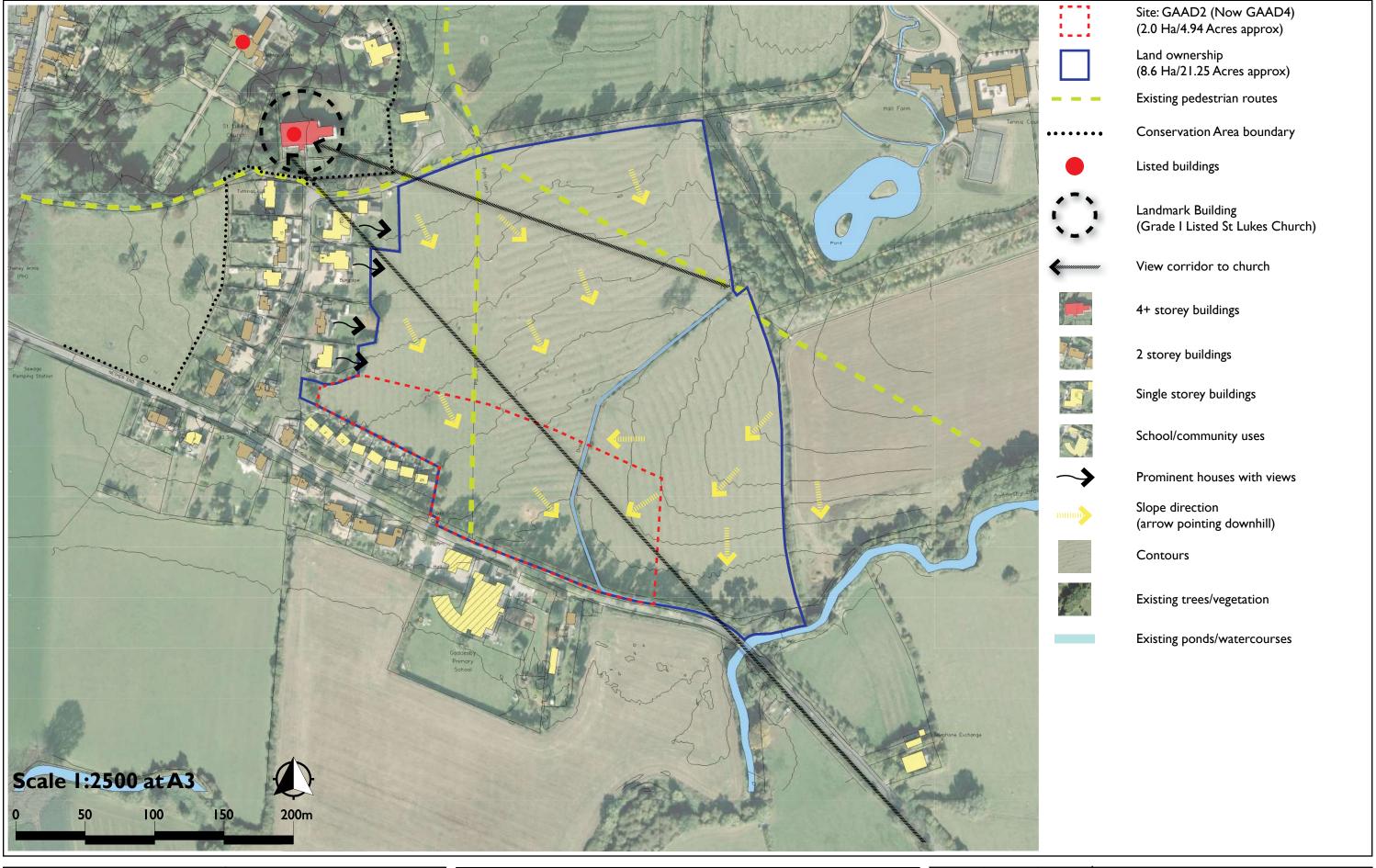
## Dr Nicholas Doggett, FSA, MCIfA, IHBC Managing Director

Email: nicholas.doggett@assetheritage.co.uk

www.assetheritage.co.uk

Wolfson College, Linton Road, Oxford, OX2 6UD T: 01865 310563

Asset Heritage Consulting Ltd: Registration No: 07502061

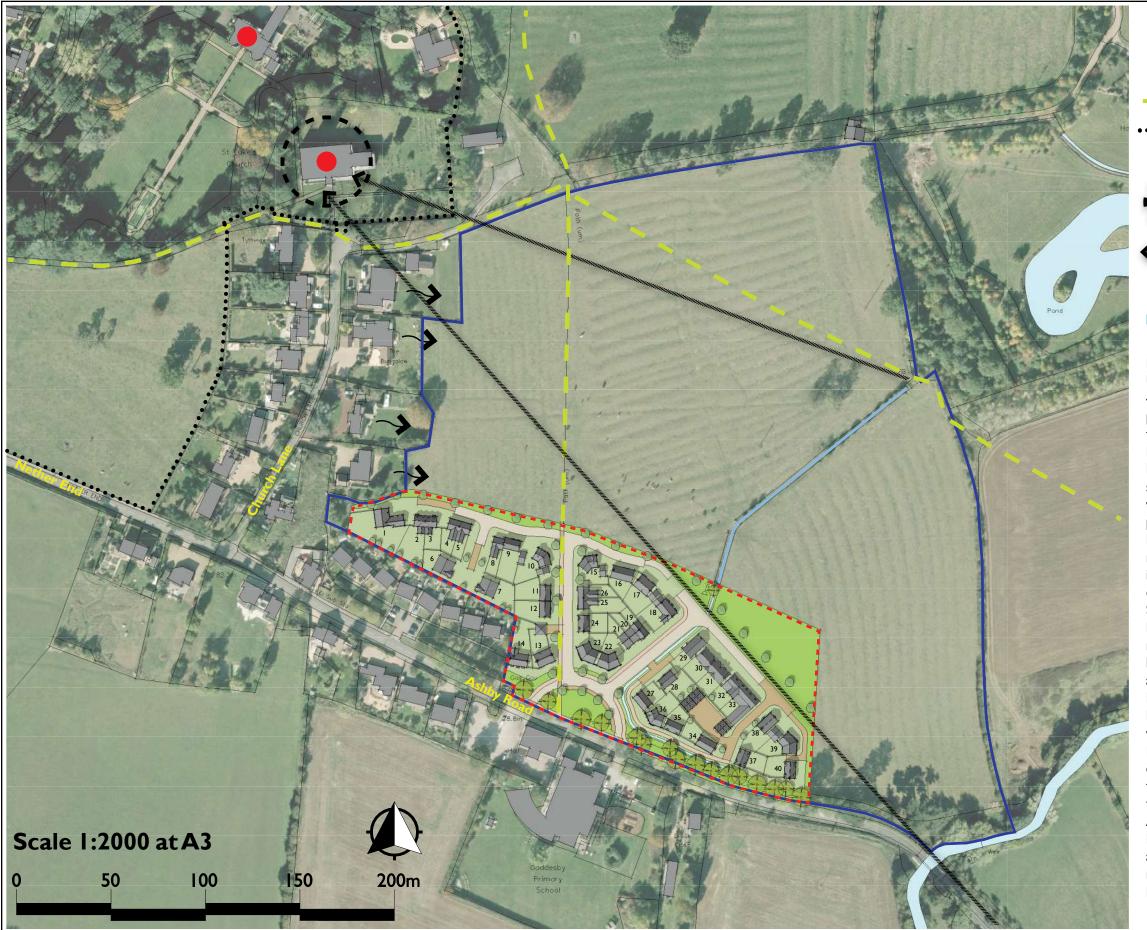


PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

### **SITE ANALYSIS**

Drawing Number	Rev.	Date	
SA-01	В	24-09-17	

townscape solutions
208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH
E: kbrown@townscapesolutions.co.uk
t: 0121 4296111, f: 0121 2268789



Site: GAAD2 (Now GAAD4)	
(2.0 Ha/4.94 Acres approx)	
Land ownership	

(8.6 Ha/21.25 Acres approx)

Existing pedestrian routes

Conservation Area boundary

Listed buildings

Landmark Building (Grade I Listed St Lukes Church)

View corridors to church

Prominent houses with views retained

Existing ponds/watercourses

#### **MASTERPLAN FEATURES**

#### Use and Amount

40 houses in line with residential context, with good proximity to the school and community centre. Mix of types and sizes.

#### Layout

Layout ensures interesting views to and through the scheme including reinforcing view corridors to church with building alignment and planting. Frontages provide positive edge to the setting of the church. Existing views from rear of houses on Church Lane retained. Distance separation/orientation ensures no impact on neighbour amenity. Layout incorporates diverted drainage channel.

#### **Scale and Appearence**

Mainly 2 storeys with potential for bungalows to the rear of existing bungalows. Appearance will reference local examples including appropriate house types such as cottages, 'farm houses' and 'barns'.

#### Landscaping

Existing trees retained as far as possible and reinforced with new tree planting.

New village green focused on school and community centre. Permanent buffer space with new planting to the northeast which also reinforces view corridor to the church.

#### Access

In/out access around village green allows turning space and parking which can serve the school opposite to remove any need for three point turns at peak times. Existing pedestrian right of way incorporated.

PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

## **ILLUSTRATIVE MASTERPLAN**

Drawing Number	Rev.	Date	tc 208
IM-01	С	29-09-17	E: k t: 0

townscape solutions
208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH
E: kbrown@townscapesolutions.co.uk
t: 0121 4296111, f: 0121 2268789



Informal lane adjacent to the field with appropriate house types. End stop building to mark extent of development.



Variety of house types and styles creating visual interest



Buildings set back behind existing mature trees



Views to development filtered by planting



New village green allowing a drop off/turning/parking area for the school.



Buildings set back behind diverted drainage channel incorporated as an attractive design feature



Use of contextually appropriate built form including 'barns', cottages and 'farm houses'



Informal lanes

PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

### **TOWNSCAPE PRECEDENTS**

Prawing Jumber	Rev.	Date	townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 58
TP-01	В	29-09-17	E: kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789



Illustrative aerial view of the masterplan looking northwest



PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

## **ILLUSTRATIVE 3D VIEWS I**

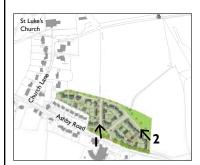
Drawing Number	Rev.	Date	townscape solutions  208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH E: kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789
IV-01	ВІ	04-10-17	



I. Illustrative view looking northwest across the proposed village green at the site entrance



2. Illustrative view looking northwest from the eastern open space to the church in the distance



PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

## **ILLUSTRATIVE 3D VIEWS 2**

Drawing Number	Rev.	Date	townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH
IV-02	В	04-10-17	E: kbrown@townscapesolutions.co.uk



Illustrative view of the masterplan looking west to Church Lane and the church



PROJECT	CLIENT
Land North of Ashby Road, Gaddesby	Ovens Family

## **ILLUSTRATIVE 3D VIEWS 3**

Drawing Number	Rev.	Date	townscape solutions 208 Lightwoods Hill, Smethwick, West Midlands, B67 5EH E: kbrown@townscapesolutions.co.uk t: 0121 4296111, f: 0121 2268789
IV-03	Α	03-10-17	