



RYDE

TOWN COUNCIL

MINUTES OF THE MEETING OF THE PLANNING COMMITTEE HELD ON TUESDAY 13TH JANUARY 2014 AT TOWN HALL CHAMBERS 10, LIND STREET, RYDE

Present: Councillors, David Moore, Jill Moore, Gary Taylor, Tim Wakeley (Chairman), Phil Warren and David Woodward.

In attendance: Tracy Reynolds, Clerk to the committee.

PUBLIC QUESTION TIME

A member of the public asked if the committee had received any information regarding a proposed development in Binstead. The clerk informed the member of public that an application had been to a previous meeting for the demolition of garages and construction of a total of 7 homes. The member of public thought that sounded like the same application and the clerk agreed to find the information and send it to the member of public.

Another member of the public asked about the Town Council's proposal to pedestrianise the High Street. The member of public had numerous concerns about the proposal. The Chairman informed the member of public that comprehensive consultation would be taking place and that they would have ample opportunity to express any concerns or potential problems with the proposal.

A member of the public also raised a question regarding the signage for the speed limits within Binstead. It was 20mph but on some approaches there appeared to be insufficient signs warning of the speed limit. In addition at the junction of Pellhurst and Queens Road there appeared to be no signage warning to give way at the roundabout. It was agreed that Councillor Warren would investigate and provide the clerk with the exact location where the signage was needed so that this could be raised with Island Roads.

The Town Council had also received correspondence asking the planning committee to consider Sunday parking in Union Street in Ryde. It was agreed that Sunday parking in Union Street would be added to the next agenda.

1. APOLOGIES

No apologies were received.

2. DECLARATIONS OF INTEREST

Councillor David Moore declared a non pecuniary interest in the Pennyfeathers planning application. He is the chairman of the Ryde Flood Action Group who have objected to the proposal. Councillor David Moore recognised that he has therefore prejudiced his position. Councillor Jill Moore also declared a non pecuniary interest due to her involvement with the same organisation.

3. MINUTES

RESOLVED that the minutes of the meeting held on the 16th December 2014 were approved as a true record of the meeting and signed by the vice chairman.

4. PROGRESS ON ACTION TAKEN

Planning and licence applications.

The committee's comments regarding the planning applications and licence applications considered at the previous planning committee were submitted to the Isle of Wight Council.

Royal George Memorial Gardens

The clerk has obtained an update regarding the current works in The Strand and The Royal George Memorial Gardens from Southern Water and will circulate this to all members.

Settlement Boundaries

The clerk wrote to Fishbourne Parish Council to take them up on their offer to write a statement for the Are Action Plan detailing the settlement boundaries between the two parishes. Fishbourne will be discussing this at their meeting on the 15th January 2015.

Masterplan meeting

As agreed at the previous planning committee meeting the chair and clerk met with the Chamber of Commerce and Industry to plan the consultation. As a result of this meeting it was agreed that the consultation would be in two phases. The first which will involve businesses and not for profit organisations is planned to take place on the 2nd February 2015.

5. MEMBERS' QUESTIONS

Councillor Woodward asked about the brick pillar on the junction of Lind Street and Church Lane. This had been damaged and following an enquiry being raised had been cordoned off and made safe. However since then no further work had been undertaken and the pillar remained unfinished. It was agreed that the clerk would write to Island Roads to ascertain what was occurring with the pillar.

6. PLANNING APPLICATIONS

It was agreed that the planning application in relation to the Brickfields site and the Pennyfeathers planning application would be moved to the start of agenda item 6.

8) P/01085/14 - TCP/32000. Brickfields, Newnham Road, Ryde, Isle Of Wight, PO333TH. All Ryde Wards. Change of use of land and buildings to haulage operating centre including plant hire and ancillary aggregate storage (sui generis use) - (revised scheme) (revised description, revised plans & additional information – December 2014) (readvertised application)
<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01085/14>

A number of residents expressed their concerns regarding the recent revision to the planning application.

Their concerns raised issues with the planning process and why the applicant was afforded a further opportunity to refine their application.

Regarding the application itself the transport and traffic figures were criticised as being incorrect and misleading relaying on old and incorrect forecasts of previous usage. Despite Island Roads bringing forward some highway improvement works it was suggested that the road widths were simply not available on the access roads to the site to accommodate the proposed vehicles generated if the application was approved. Concerns were also raised regarding safety to other road users and pollution caused by the site.

The change in usage classification from B2 and B8 caused some concern and it was agreed that the clerk would seek clarification of the reason for this change and the effect of the change.

The committee were interested to establish whether the new revision addressed their very serious concerns and objections. However no evidence could be found that demonstrated that the concerns and objections of the Town Council were being or had been addressed.

In light of the discussion it was RESOLVED that the comment in Appendix A be made to the Isle of Wight Council's planning department.

15) P/01456/14 - TCP/31352/A. Land known as Pennyfeathers, land to the south of Smallbrook Lane, and to the west of, Brading Road, Ryde, Isle Of Wight, PO33. All Ryde Wards. Outline for maximum of 904 residential units, school; community centre; commercial buildings; relocation of Westridge Garage; community energy

centre; sports building and changing rooms; structural landscaping; play areas and associated highway improvements (revised scheme)

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01456/14>

The committee RESOLVED to defer consideration of this planning application to a specially convened meeting of the planning committee on the 22nd January at 6pm at Ryde Methodist Church.

1) P/01442/14 - TCP/28152/E. Beachwood, Quarr Road, Ryde, Isle Of Wight, PO334EL. Binstead & Fishbourne Ward. Proposed two storey extension on west elevation to form additional living accommodation

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01442/14>

Ryde Town Council considered the above application and RESOLVED to make the following comment:

RESOLVED that the following objections to this proposal be made: It is our view that the proposed two story side extension has a significant negative impact on the architectural integrity of the original design, is excessive and due to its scale and mass is non compliant with Policy DM2. It fails to enhance the Area of Outstanding Beauty and instead detracts from it. In addition it is our view that it is also non compliant with policy DM12 in that it does not conserve, promote or enhance the landscape. In consequence of the above it is an inappropriate development in an Area of Outstanding Natural Beauty. In addition we would not want to see the loss of ANY of the mature trees on the site.

2) P/01482/14 - TCP/22191/B. 55 Marlborough Road, Ryde, Isle Of Wight, PO331AE. Ryde East Ward. Proposed extension at first floor level to provide en-suite bedroom

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01482/14>

RESOLVED that no objection be made.

3) P/01536/14 - TCP/27642/F. Kingarth House, Church Road, Binstead, Ryde, Isle Of Wight, PO333SZ. Ryde Binstead & Fishbourne Ward. Demolition of garage; replacement detached garage

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01536/14>

RESOLVED that no objection be made.

4) P/01540/14 - TCP/26325/A. 41 Argyll Street, Ryde, Isle Of Wight, PO333BY. Ryde North West Ward. Demolition of garden room; proposed single storey extension on rear elevation to form garden room

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01540/14>

RESOLVED that no objection be made.

5) P/01499/14 - TCP/04827/C42 Argyll Street, Ryde, Isle Of Wight, PO333BY. Ryde North West Ward. Demolition of garage; replacement garage (revised scheme)

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01499/14>

RESOLVED that no objection be made.

6) P/01502/14 - TCP/32099. 50a, St. Johns Road, Ryde, Isle Of Wight, PO332RS. Ryde South Ward. Two storey side extension to provide additional living accommodation

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01502/14>

RESOLVED that no objection be made.

7) P/01254/14 - TCP/28303/D. land adjacent, Cranford House, Binstead Road, Ryde, Isle Of Wight, PO33. Ryde West Ward. Detached house with parking (revised plans)(readvertised application)

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01254/14>

RESOLVED that no objection be made.

9) P/01569/14 - LBC/32107. The Coachhouse, Buckingham Villa, Buckingham Close, Ryde, Isle Of Wight, PO33 2DW. Ryde North West Ward. LBC for proposed conservatory

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01569/14>

RESOLVED that no objection be made subject to the comments of the conservation officer.

10) P/01568/14 - TCPL/32107/A. The Coachhouse, Buckingham Villa, Buckingham Close, Ryde, Isle Of Wight, PO33 2DW. Ryde North West Ward. Proposed conservatory

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01568/14>

RESOLVED that no objection be made subject to the comments of the conservation officer.

11) P/01557/14 - TCP/28013/F. 115 High Park Road, Ryde, Isle Of Wight, PO331BZ. Ryde East Ward. Demolition of garage and boot room; construction of end of terrace dwelling with parking/turning area.

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01557/14>

RESOLVED that no objection be made.

12) P/01571/14 - TCPL/32110/A. 2 The Colonnade, Lind Street, Ryde, Isle Of Wight, PO332NE. Ryde North West Ward. Continued use as hairdressing salon

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01571/14>

RESOLVED that no objection be made.

13) P/01572/14 - LBC/32110. 2 The Colonnade, Lind Street, Ryde, Isle Of Wight, PO332NE. Ryde North West Ward. LBC for regularisation of internal alterations in connection with use as hairdressing salon

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01572/14>

RESOLVED that no objection be made.

14) P/01575/14 - A/00237/L. National Westminster Bank Plc, St. Thomas Square, Ryde, Isle Of Wight, PO332PL. Ryde North West Ward. 1x internally illuminated projecting sign; 1x set of internally illuminated letters and logo; 1x internally illuminated ATM tablet; 1x internally illuminated fascia sign; 2x non-illuminated plaque signs

<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01575/14>

RESOLVED that no objection be made.

7. PLANNING REVISIONS

The committee considered the planning revision received below:

P/01436/14 - TCP/32081. Solent House, Playstreet Lane, Ryde, Isle Of Wight, PO333LJ. Ryde West Ward. Proposed detached garage/workshop
<http://www.iwight.com/planning/DirectToAppDetails2.aspx?P/01436/14>

Ryde Town Council considered the above application and RESOLVED to make the following comment:

Ryde Town Council raises no objections to this application subject to a satisfactory tree officer's report. The Town Council would like to see the retention of all the mature trees on the site.

8. PLANNING APPEALS

The committee noted that no planning appeals for Ryde have been received.

9. PLANNING DECISIONS

The committee noted the following planning decisions.

Week ending 12th December 2014

1) P/01270/14. land at Crossways, Church Road, Binstead, Ryde, Isle Of Wight, PO33. Binstead & Fishbourne Ward. Detached dwelling with vehicular access off Pitts Lane (aorm) (revised plans)

Decision: Granted Plan Permission

Ryde Town Council commented as below:

Ryde Town Council does not object to the application but expresses its disappointment at the unimaginative architecture and it is not satisfied that it is in keeping with the ambience of the area.

2) P/01285/14. Ashey Vineyard, Ashey Road, Ryde, Isle Of Wight, PO334BB. Havenstreet, Ashey & Hay Ward. Lawful Development Certificate for continued use of property as a dwelling without complying with agricultural occupancy condition

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

3) P/01332/14. Lake Huron, 51 Upton Road, Ryde, Isle Of Wight, PO333HR. Havenstreet, Ashey & Haylands Ward. Variation of condition no. 2 on P/00720/14 - TCP/27724/E to allow the provision of 2 parking spaces onto Upton Road

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

4) P/01012/14. 14 Wood Street, Ryde, Isle Of Wight, PO332DH. Ryde North East. Detached garden pod

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

5) P/01495/13. land adjacent to Clark Masts, 20 Ringwood Road, Ryde, Isle Of Wight, PO33. Ryde West Ward. A terrace of four houses with bin/cycle store and associated parking

Decision: Granted Plan Permission

Ryde Town Council commented as below:

Ryde Town Council raised no objections to this application and it was felt that the revised scheme, replacing the block of flats with a terrace of four houses, was an aesthetic improvement and will create a more pleasing entrance into the development.

6) P/01265/14. Little Thorpe, Pitts Lane, Ryde, PO333SU. Binstead & Fishbourne Ward. Demolition of dwelling and garage; proposed detached house, detached pool house and detached double garage and garden store (revised scheme)

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

7) P/01258/14. 13 Adelaide Place, Ryde, PO333DP. Ryde West Ward. Proposed single storey extension on rear elevation to enlarge kitchen/dining areas

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

Week ending 19th December 2014

8) P/01377/14. 26 Woodland View, Ryde, PO332DG. Havenstreet, Ashey & Haylands Ward. Proposed single storey extension on east elevation to form utility room

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

9) P/01199/14. Oakwood, 67 West Hill Road, Ryde, PO33 1LQ. Ryde North East Ward. Proposed alterations and conversion of ground and first floor to form 2 self-contained flats; formation of vehicular accesses's and parking areas

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

10) P/01376/14. 22 Union Street, Ryde, Isle Of Wight, PO332DT. Ryde North West Ward. LBC for 1x flag pole with associated fabric sign; 1x non-illuminated projecting sign (revised scheme)

Decision: Granted Plan Permission

Ryde Town Council raised no objections.

11) P/01279/14. 3 Wykeham Close, Ryde, Isle Of Wight, PO333ST. Binstead & Fishbourne Ward. Retention of shed; proposed porch on east elevation

Registration Date: 20/10/2014 00:00:00

Decision: Granted Plan Permission)

Ryde Town Council raised no objections.

12) P/01315/14. 34 Kings Road, Ryde, Isle Of Wight, PO333RX. Binstead & Fishbourne Ward. Alterations; single storey rear extension to provide kitchen; re-roofing of existing property

Decision: Granted Plan Permission
Ryde Town Council raised no objections.

13) P/01375/14. 22 Union Street, Ryde, Isle Of Wight, PO332DT. Ryde North West Ward. Proposal: 1x flag pole with associated fabric sign; 1x non-illuminated projecting sign (revised scheme)

Decision: Granted Plan Permission
Ryde Town Council raised no objections.

Week ending 26th December 2014 and 2nd January 2015

No decisions for the Ryde area were taken during the above two weeks.

10. LICENCE APPLICATIONS

The committee were advised that no licence applications had been received since the last planning committee meeting.

11. CONSULTATION ON THE HIGHWAYS AMENITY PERMISSIONS (STREET LICENSING) POLICY.

The committee considered the consultation document and **RESOLVED** to agree the response at Appendix B.

12. PEDESTRIANISATION OF THE HIGH STREET

The committee **RESOLVED** to defer this item to a future planning committee meeting.

13 LOCAL ACCESS FORUM?

The committee considered an invitation to attend a special Local Access Forum Meeting on 19th February 2pm – 4pm, in the Council Chamber at County hall, Newport.

It was agreed that the invitation be extended to other councillors who may wish to attend.

14. DATE OF NEXT MEETING

The next planning committee meeting is the 22nd January 2015

Appendix A

Ryde Town Council RESOLVED to reiterate strongly their previous objections in their entirety.

This is the third application/revision that this Town Council have considered. After the first application this Town Council raised a number of serious objections and concerns. The Town Council was disappointed that the second application (first revision) did not address the very serious concerns they expressed. The additional transport survey, provided in the revision, raised further concerns for the Town Council regarding the effect on the rural character of the location and the effect of large HGV vehicles on other road users and pedestrians.

We are disquieted that there should be a further application, which fails to recognise these concerns or attempt to clarify or answer them

We therefore wish to strenuously reiterate them to the Planning Department at the Isle of Wight Council.

We also wish to draw to the planning department's attention the unsatisfactory access to the Brickfield's application on the Isle of Wight Council's website which has proven extremely difficult and at times impossible to access and suggest an extension to the consultation period.

We do require, in the interests of transparency that this planning application be decided upon by the Isle of Wight Council's Planning Committee.

Our previous comments, which we uphold are below.

Ryde Town Council considered the above application and RESOLVED to make the following comment:

Ryde Town Council have considered the new application in relation to the Brickfields Site.

When considering the earlier application the Town Council registered an objection together with a number of concerns.

The Town Council does not believe that this application adequately addresses the concerns previously registered and so has resolved to re-state their earlier objections and concerns, in their entirety, together with further concerns arising from this submission:

The application does not accord with planning policy SP4 (Tourism), which aims to increase and improve the Tourism offer or SP5 (Environment), which

aims to protect conserve or enhance the environment and SP7 (Travel), which aims to improve travel choice.

The site was previously used for rural and equestrian pursuits, which suited the geography and the rural nature of the locality. A significant number of stables and liverys operate in the locality engaging riders of all ages and abilities. The proposed new use of the site and the consequent substantial increase in HGV traffic movements on winding country lanes will not only have a detrimental impact on these activities but will also place at risk cyclists, walkers and all other users of these lanes.

The applicant has provided a viability report stating that for economic reasons they need to relocate but this does not take into account the potential damage to the economic viability of businesses that already exist and operate locally or the effects on tourism and the environment.

This proposal will necessitate the use and storage of hazardous flammable materials on the site. There will be fuel tanks, heavy oils and other materials, which are associated with the proposed operation of the site. The applicant has not provided a risk assessment for the storage and use of these materials nor have they provided a satisfactory management plan. In the absence of such a plan the Town Council have serious concerns regarding the applicant's ability to safely manage these materials and protect the environment from accidental spillage.

In addition Ryde Town Council would like to re-state their earlier objections and concerns which were:

Ryde Town Council formally objects to the planning application.

Notwithstanding a number of inaccuracies and contradictions within the application itself, Ryde Town Council has carefully considered the evidence provided within the application and makes it's judgment on that evidence.

Having reviewed the evidence, considered the comments received and listened to representations at the meeting, the council is of the view that the current infrastructure would not be adequate to support the predicted transport movements and usage of the site.

In terms of the traffic and sustainable transport aspect we do not feel the application is in accordance with the following policies:

Policy SP7 Travel states:

'Development proposals should not negatively impact on the island's Strategic Road network..... If negative impacts are identified, appropriate mitigation measures are expected.'

DM17 Sustainable travel

The council will support proposals that increase travel choice and provide alternative means of travel to the car. Development proposals will be expected to:

(2) Provide and improve accessibility for pedestrian, cycling, equestrian and public transport, especially when they:

(a) Create sustainable routes between urban and rural areas

(4) Demonstrate they are well-related to the island's Strategic Road network and that the network has adequate capacity to accommodate the development.

Although the policy SP7 suggests that mitigation measures could minimise and manage any detrimental or negative effects of the proposal this mitigation would need to be extensive to enable and indeed increase travel choice by residents and visitors. It is the Town Council's view that the mitigation required would be detrimental to the rural nature and character of the area.

It is clear from the evidence provided of 210 movements per day, half of which are by HGV's, and from comments made on the application that the road network is currently woefully inadequate to support the number of and type of vehicles proposed to use the Brickfields site.

All three potential routs into the site, Stroudwood Road, Newnham Road, and Havenstreet all have accessibility issues, which would need to be addressed prior to the site being used.

The preferred route, from the applicants, would involve the majority of journeys to and from the site via Newnham Road. This road has a number of pinch points, bends and a general lack of visibility.

Mitigation, which would be required under SP7, to enable safe access to and from the site whilst maintaining and increasing the usage of other users would necessitate:

- Widening and straightening of the road and the creation of pavements, which in turn could involve compulsory purchase.**
- Relocation of parking, but finding suitable locations might prove difficult.**
- Removal of hedgerows to improve visibility for smaller vehicles and lorries.**
- Resurfacing and strengthening of the road structure to enable it to take the weight of a laden HGV/low loader.**
- Installation of traffic lights and other traffic management improvements to ensure safe transit of pedestrians and other road users.**

The Town council believes, that even if this mitigation identified above, was undertaken it would however destroy and be detrimental to the rural nature of the area and will also contribute to the loss of the green infrastructure, which DM13 aims to maintain. In addition the loss of a tourist attraction would be non compliant and contrary to other planning policies such as DM7 and would in effect destroy the rural character of the area.

It is the Town Council's view, that the application is also non compliant with other planning policies such as:

DM7 Social and Community Infrastructure.

'The council will support development proposals that improve cultural, educational, leisure and community facilities. Development proposals are expected to..... (1) consider the needs and requirements of all people in the community (both immediate and wider) it will serve.'

And:

DM13 Green infrastructure

'The council will support proposals that protect, enhance and manage a diverse network of multi-functional Green Infrastructure (GI) assets across the Island. Development proposals will be expected to:

Protect and enhance the integrity and connectivity of the island's GI network as identified in the Isle of Wight Green Infrastructure Mapping Study.'

Finally, given the serious implications of approval we strongly suggest that this application be called in and decided upon at planning committee where interested parties have an opportunity to voice their comments.

Appendix B

CONSULTATION ON THE HIGHWAYS AMENITY PERMISSIONS (STREET LICENSING) POLICY.

Ryde Town Council's response to the draft document is as follows:

Firstly the Town Council is grateful to be afforded the opportunity to comment on the draft policy.

Overall, the Town Council are pleased to see a policy in this area, which has caused this Town Council some concern. The draft that you have shared goes a long way toward addressing the majority of our concerns.

Ryde Town Council would have preferred to have had more information in relation to the proposed fees prior to comment but base our comments upon the draft document submitted as follows.

(1.4) This paragraph states that legislative amendments will be made automatically. We welcome this but ask that provision be made to notify interested parties, including the Town Council, when such amendments are made with a copy of the new amended policy.

(4.4) This paragraph focuses on the visual impact of the individual items of street furniture. The Town Council believe that this section should extend further than individual design and should in fact consider the overall appearance of the furniture at each location together with an overview of the collective effect in any location.

(5.4) The suggested application form does not seem to ask for a reason for the application. The Town Council would suggest a rational be included, as the Town Council believe this could be an important consideration. In addition the application should ask the requested times.

(5.9) In this paragraph and also reiterated in (p6.6) the policy suggests returning the application fee, which is understood to be 25% of the final fee, if the application is unsuccessful. The Town Council do not agree with this and think this charge should be retained regardless of whether the licence is granted. It is the Town Council's view that any application will generate costs which will include costs of processing, advertising and additional correspondence. In addition there will be the cost implications relating to officer time in considering the application itself. If these costs cannot be recovered against a fee then the policy could become unworkable and too costly. In addition making the application process free, which the Town Council believe this amounts to, would result in an influx of applications. These would be made on the 'win win' notion of either getting a licence or getting your money back. The potential high demand could be difficult or impossible to manage. In the Town Council's view it is essential that this new policy is self-financing, especially given the

current economic climate, and to have a non refundable charge is consistent with other licencing applications as well as planning applications.

(p6) This section does not provide any fee figures, but the Town Council believe that this is a fundamental part of this policy and are disappointed that figures are not available for consultation. The Town Council would ask that when there are the fee figures are agreed that interested parties, including the Town Council, are consulted.

(p7) This section states that consultation on the applications will be for 28 days but remains silent on the accessibility of objections. The planning department have them as accessible, and licencing as hidden. We believe that these applications, comments and licences should be available for the general public to view in the interests of transparency.

(p8.4) The policy states that when considering comments received they will be weighted and gives an example stating 'professional knowledge'. We believe this would prove difficult to quantify and as a result is not workable. If there is to be any weighting it should be transparent and not based on a subjective interpretation as to the professional knowledge of the person making any comment.

The policy also states that if an objection is made the application will go to the licence sub committee, we welcome this and would ask that we are given adequate notice of any and all such referrals.

The policy also states that if there are no objections the application will be approved. We believe that any application should have to meet certain criteria in any case. We note the requirement for pavement access, but suggest that you consider other criteria for the approval of any licence such as complaint information or a demonstration of a need in that location as examples.

(p11) This paragraph deals with enforcement but the focus is entirely on breaches of current licences and their conditions. It makes no reference to those businesses who may not or never have had a licence because they either have never applied for it, or who applied and were refused. In the interests of fairness these 'unlicensed' businesses need to be part of this policy and the action they can expect for obstructing the highway without a valid licence should be made clear and explicit.

It is essential to be able to enforce the policy for all businesses including those who have slipped through the net or who may be taking advantage of the fact that they have not applied. The Town Council would like to see much more information in this section about what the consequences will be of any breach and what steps will be taking by the licencing authority to address these. Without enforcement, there is a real risk that the policy would not be adhered to as businesses have nothing to lose by ignoring it.

In addition if a fee was retained for every application, successful or not, then this money could create a budget and be used to pay for any necessary enforcement.

Finally, The Town Council hope that these comments are helpful, and is grateful for, and welcome your attempts to formalise this process.

