

TEWKESBURY BOROUGH COUNCIL – DEVELOPMENT CONTROL

Committee:	Planning
Date:	16 February 2021
Site Location:	Brookfield Ashchurch Road Tewkesbury Gloucestershire GL20 8JY
Application No:	20/00294/FUL
Ward:	Isbourne
Parish:	Ashchurch Rural
Proposal:	Erection of 3 no. dwelling houses.
Report by:	Bob Ristic
Appendices:	Site location plan. Site layout plan. Elevations.
Recommendation:	Permit

1.0 SITE DESCRIPTION AND PROPOSAL

- 1.1. The application site comprises the rearmost part of an extensive garden to ‘Brookfield’ a detached dwelling set on the Southern side of the A46 Ashchurch Road and to the West of the Village Hall.
- 1.2. The site extends across the width of Brookfield and the garden to the adjoining property at Deerhurst House, is presently laid to lawn with a number of trees and shrubs and the land and slopes gently down to the south.
- 1.3. The application originally proposed 4 dwellings (two pairs of 2½ storey semi’s). The scheme was amended following discussions with officers and the proposal now seeks planning permission for 3 dwellings comprising one detached 2½ storey unit and a pair of 2½ storey semi’s. The site would be accessed from the south through a recently permitted housing development (which is yet to be completed) and would in effect be an extension to the street scene of that development with the properties arranged to front onto an extended access road the development would flank towards the rear elevations of Brookfield and Deerhurst House. **(See site layout and plans).**
- 1.4. The site lies outside of any defined settlement and is not subject to any landscape designations.

2.0 RELEVANT PLANNING HISTORY

2.1 The recent planning history at the application site is set out below:

Application Number	Proposal	Decision	Decision Date
89T/1719/01/02	Change of use from agricultural to domestic garden land. (Retention)	PER	28.02.1990
03/01055/FUL	Garage, porch, bedroom and ensuite extension.	PER	21.08.2003
07/00137/FUL	Two storey front and rear extensions providing sitting room, lounge, study, bedroom and ensuite extensions	PER	10.04.2007

2.2 The planning history for the development (Land Behind Newton Cottages) from which the application site would be accessed is set out below:

Application Number	Proposal	Decision	Decision Date
14/00343/OUT	Outline application for the erection of up to 45 dwellings to include open space and new vehicular access (appearance, landscaping, layout and scale to be reserved for future consideration)	PER	18.10.2017
18/00794/APP	Application for the approval of reserved matters pursuant to outline planning permission 14/00343/OUT (appearance, landscaping, layout and scale) for 44 dwellings and open space (Access previously approved).	APPROV	26.09.2019

3.0 RELEVANT POLICY

3.1. The following planning guidance and policies are relevant to the consideration of this application:

National guidance

3.2. National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) - Adopted 11 December 2017

3.3. Policies: SP1, SP2, SD3, SD4, SD6, SD10, SD11, SD14, INF1.

Tewkesbury Borough Local Plan to 2011 - March 2006 (TBGP)

3.4. None.

Tewkesbury Borough Plan 2011-2031 Pre-submission Version (July 2019)

3.5. Policies: RES1, RES2, RES3, RES4, RES5, RES13, TRAC1, TRAC9.

3.6. Human Rights Act 1998 - Article 8 (Right to Respect for Private and Family Life).

3.7. The First Protocol, Article 1 (Protection of Property).

3.8. Human Rights Act 1998 - Article 8 (Right to Respect for Private and Family Life).

3.9. The First Protocol, Article 1 (Protection of Property).

4.0 CONSULTATIONS

4.1. The following representations have been received in response to the originally submitted scheme:

4.2. **Ashchurch Rural Parish Council – Object.**

- Potential noise from village hall carpark.
- Previous approvals problematic for hall management and residents.
- Trees along boundary screen noise from hall and playground.
- Trees should be retained for privacy and wildlife.
- Water flowed through gardens in 2007 floods.
- Tirle Brook submerges school field.
- Possible restrictive covenant.

4.3. **Ashchurch Village Hall Committee**

- Potential noise from village hall carpark used daily.
- Public amenity cannot be guaranteed.
- Problems from hall to residents.
- Existing trees screen noise.
- Trees should be retained.

4.4. **Highway Authority – No objections subject to conditions.**

4.5. **Urban Design Officer – (Comments in respect of *originally* submitted development) -**

- Piecemeal and cramped form of development.
- Gardens of proposed properties are very small.
- The dwellings are close to the rear of the existing properties.
- May have an overbearing impact.
- Located at end of long cul-de-sac.

4.6. The following representations have been received in response to the revised scheme:

4.7. **Ashchurch Rural Parish Council – Object.**

- Would remove mature trees and hedging that provide screening into neighbouring properties to the west.
- Plot 1 is 3 storeys.
- Would be the highest building within the village.
- Levels are allegedly shown to be the same as Brookfield.
- Views into neighbouring properties is intrusive.
- Landscape will be harmed by removal of trees height of the houses.
- Concur with Urban Design Officer comments.
- Would have an overbearing impact on existing properties.

- Development is piecemeal and cramped and out of keeping.
- Would be located at the end of a very long cul-de-sac.
- Would be poorly connected and integrated.
- The development is opportunistic.
- Would be contrary to policies.
- Not convinced by the drainage and the risk of flooding that this development will create.
- Drainage Officer comments should be sought.

4.8 **Borough Tree Officer** – Some nice trees will be lost however the replacement planting is considered acceptable.

4.9 **Environmental Health Officer** – No objections.

Records show no recent complaints relating to noise in the area.

4.10 **Borough Drainage Adviser** – No objections subject to conditions

5.0 PUBLICITY AND REPRESENTATIONS

- 5.1. The application has been publicised through the posting of site notices for a period of at least 21 days.
- 5.2. Two letters of representation have been received. The comments raised are summarised as follows:

- Development directly behind house.
- No objection to housing in garden.
- Concerns with design and scale overshadowing and privacy.
- Concerns how it will fit with existing homes in Ashchurch.
- Nearest property would be 18metres away with a 9.5 metre height.
- Existing house 7.1 metres high.
- Lower detached house may be more appropriate.
- Bathroom window should be obscure glazed and fixed.
- 3 storeys is out of character.
- Direct overlooking of school.
- Would remove mature trees.

5.3 A further site notice was posted upon receipt of amended plans. No further representations have been received from members of the public.

6.0 POLICY CONTEXT

- 6.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. Section 70 (2) of the Town and Country Planning Act 1990 provides that the Local Planning Authority shall have regard to the provisions of the Development Plan, so far as material to the application, and to any other material considerations.
- 6.2. The Development Plan currently comprises the Joint Core Strategy (JCS) (2017), saved policies of the Tewkesbury Borough Local Plan to 2011 (March 2006) (TBLP), and a number of 'made' Neighbourhood Development Plans.

- 6.3. The Pre-Submission Tewkesbury Borough Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 18 May 2020 for examination. On the basis of the stage of preparation it has reached it is considered that the plan can be afforded at least moderate weight. However, the weight to be attributed to individual policies will be subject to the extent to which there are unresolved objections (the less significant the unresolved objections, the greater the weight that may be given) and their degree of consistency with the NPPF (the closer the policies to those in the NPPF the greater the weight that may be given).

- 6.4. The relevant policies are set out in the appropriate sections of this report.

7.0 ANALYSIS

Principle of development

- 7.1 The application site lies to the south of the A46 at Ashchurch, which is characterised by commercial and residential development along its length. The proposed development would be set to the rear of existing residential development and to the north of a recently permitted housing development (Land Behind Newton Cottages), in proximity to Ashchurch Primary School and Village Hall as well as employment and public transport provision - both bus and rail. The application site is not therefore considered isolated however it is acknowledged that other services such as shops and leisure are limited.
- 7.2 JCS Policy SP2 sets out that development outside of Tewkesbury Town and Service Villages and within the remainder of the rural area will be subject to Policy SD10.
- 7.3 JCS Policy SD10 sets out the Council's approach to housing development and states that residential development will be permitted at sites allocated for housing through the development plan. Proposals on un-allocated sites will only be permitted under certain circumstances which includes at paragraph 4.ii '... infilling within the existing built up areas of ...Tewkesbury Borough's towns and villages except where otherwise restricted by policies within District Plans'
- 7.4 The application site is located within the built-up area of Ashchurch, to the rear of a row of existing dwellings, to the north of a recently permitted housing development and to the west of the village hall and associated carpark. The proposed three dwellings would be located on the rear part of an extensive garden area, would infill a gap between existing and pending residential development and would therefore be set in the context of existing built development. The principle of the proposal is therefore considered acceptable subject to compliance with other local plan policies and material considerations.
- 7.5 In terms of the emerging Development Plan, this comprises the Pre-Submission Tewkesbury Borough Plan was submitted to the Secretary of State for Housing, Communities and Local Government on 18 May 2020 for examination. On the basis of the stage of preparation it has reached it is considered that the plan can be afforded at least moderate weight. However, the weight to be attributed to individual policies will be subject to the extent to which there are unresolved objections (the less significant the unresolved objections, the greater the weight that may be given) and their degree of consistency with the NPPF (the closer the policies to those in the NPPF the greater the weight that may be given).
- 7.6 Policy RES4 supports small scale development of a scale proportionate to the size and function of the settlement, maintains sustainable patterns of development and is well related to existing buildings. It should however be noted that there are a significant number of unresolved objections in respect of this policy which can only be afforded limited weight at this time.

Five Year Housing Land Supply

- 7.7 As set out in the latest Tewkesbury Borough Five Year Housing Land Supply Statement published in December 2020, the Council can demonstrate a 4.35 year supply of deliverable housing sites. On the basis therefore that the Council cannot at this time demonstrate a five year supply of deliverable housing land, the Council's policies for the provision of housing should not be considered up-to-date in accordance with footnote 7 of the NPPF and in accordance with paragraph 11 of the NPPF the presumption in favour of sustainable development (the 'tilted balance') applies. The presumption is therefore that permission should be granted unless policies for protecting assets of particular importance provides a clear reason for refusing the development or any adverse impacts of permitting the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. This will be assessed below.
- 7.8 Members will be aware of the recent appeal decision at Ashmead Drive in which the Inspector concluded that the Council can demonstrate a 1.82 year supply. This is principally because the Council includes advanced delivery (or 'oversupply') against annual housing requirements in its five-year supply calculations. Appeal decisions are not binding precedents however. Officers consider that, on the context of the plan-led system, it is wrong not to take into account houses that have already been delivered during the plan period, essentially ahead of schedule, and which meet the needs being planned for in the area. Officer's advice is therefore that a 4.35 year supply can be demonstrated at this time.
- 7.9 Nevertheless, as set out above, as the Council cannot demonstrate a five year supply of deliverable housing sites, the presumption in favour of sustainable development is engaged in this case.

Accessibility and Highway Safety

- 7.10 Paragraph 103 of the NPPF sets out that opportunities to maximise sustainable transport solutions which will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. Furthermore, development should only be prevented or refused on highways grounds where there would be an unacceptable impact on highway safety or the residual cumulative impacts of development are severe. Policy INF1 of the JCS requires that developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters.
- 7.11 The application site would be accessed through a recently proposed housing development at land behind Newton Cottages and a continuation northward of the previously permitted estate road serving that development. The proposal would provide 8 off street parking spaces as well as 3 additional garage spaces and the formation of a turning head.
- 7.12 The proposed access manoeuvring and parking provisions have been assessed by the Local Highway Authority and no objections have been raised subject to conditions which include the provision of electric vehicle charging points and covered and secure cycle storage.
- 7.13 Accordingly and subject to compliance with conditions set out below it is considered that safe and suitable access can be provided to the site.

Design, Layout and Amenity

- 7.14 The NPPF sets out that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Policy SD4 of the JCS advises that new development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Furthermore, JCS Policy SD14 sets out that development should protect and seek to improve environmental quality and should not cause unacceptable harm to local amenity including the amenity of neighbouring occupants.
- 7.15 The proposed development would, in effect, be a continuation of the existing residential development at land behind Newton Cottages and the design and scale of the current proposal would be in keeping with that scheme resulting in acceptable integration with that development (**See attached Street Scene Plan**).
- 7.16 Concerns have been raised with regards to continuing the existing cul-de-sac, layout and relationship with existing dwellings to the North of the site and overlooking of gardens.
- 7.17 The application has been revised since it was originally submitted, reducing the number of proposed dwellings from four to three. This has allowed for a more spacious layout to the development, with increased garden sizes and an improved relationship with existing development to the north.
- 7.18 While the proposed dwellings would be 2½ storeys in height, they would be sited at a lower level than the existing frontage properties due to the fall in the site towards the south and overall height of the dwellings. Furthermore Plot 1 would be set over 21 metres from the rear elevations of Brookfield and Deerhurst, significantly exceeding the typically accepted ‘back-to side’ relationship of 11 metres. As a result there would be no adverse impacts to this property in terms of loss of light or any overbearing effect.
- 7.19 The proposed development would have a westerly outlook, fronting towards the access drive and gardens to properties beyond. While concerns have been raised with regards to overlooking it should be noted that the development would be located towards the rearmost part of these extensive gardens to adjoining properties which are used informally and a significant distance from the principal amenity areas set to the northeast of the site and around the rear elevations to adjoining properties. Accordingly, there would be no demonstrable harm from overlooking this area.
- 7.20 While the proposal would extend the previously permitted cul-de-sac by approximately 34 metres to service the proposed 3 dwellings this would not result in any demonstrable harm to the character of the area or the living conditions of future occupiers.
- 7.21 Accordingly it is considered that the proposed development would be of an acceptable design layout and scale which would not adversely impact the character of the area or the living conditions of adjoining occupiers.

Drainage and Flood Risk

- 7.22 JCS Policy INF2 advises that development proposals must avoid areas at risk of flooding and must not increase the level of risk to the safety of occupiers of a site and that the risk of flooding should be minimised by providing resilience and taking into account climate change.

7.23 The application site is located in Flood Zone 1 and is a location that would be least at risk from flooding. The application has been accompanied by a drainage strategy which demonstrates how the proposed development would connect to the surface and foul drainage provision of the adjacent development. The Council's drainage adviser has confirmed that this arrangement would be acceptable, however development would be reliant on this infrastructure being in place prior to the occupation of the dwellings. It is considered that this can be controlled by an appropriately worded condition to ensure satisfactory drainage arrangements are provided.

Other Matters

- 7.24 While the proposed development would result in the loss of Leylandii and ornamental trees at the site to accommodate the development which is regrettable, the submitted details however propose the provision of a new 3 metre beech/hornbeam screen to the eastern boundary of the site as well as tree and shrub planting to the front gardens of the plots, which would result in an acceptable appearance and compensatory planting to the development.
- 7.25 The Village Hall Committee have raised concerns regarding noise impact upon future occupiers given the proximity of the hall to the site. In response the applicant has proposed a 2-metre acoustic fence to the eastern boundary of the site which will serve to minimise impacts of noise. Furthermore, the Council's Environmental Health Officer has raised no objections to the proposal.

8.0 Overall Balancing Exercise and Conclusion

- 8.1 Section 38(6) of the Town and Country Planning Act 1990 provides that, if regard is to be had to the development plan, the determination must be made in accordance with the development plan unless other material circumstances indicate otherwise. Section 70(2) of the Act provides that the Local Planning Authority shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations.
- 8.2 On the basis that the Council cannot at this time demonstrate a five year supply of deliverable housing sites, the Council's policies for the supply of housing are out of date. In accordance with paragraph 11 of the NPPF, the presumption in favour of sustainable development indicates that permission should be granted unless policies for protecting areas of assets of particular importance in the NPPF provide a clear reason for refusing the development proposed, or any adverse impacts of permitting the development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
- 8.3 There are no NPPF policies for the protection of areas or assets of particular importance which apply in this case and therefore, it is clear that the decision-making process for the determination of this application is to assess whether the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.

Benefits

- 8.4 The proposal would deliver three new dwellings in a sustainable and accessible location with good links to Tewkesbury, local employment and services which are a social benefit arising from the proposal.
- 8.5 There would be economic benefit during the construction phase and further economic benefits would arise from the additional population which would benefit local services though these would be limited given the small scale of the proposal.

Harms

- 8.6 While the proposal would result in existing trees which are not worth of protection, the impacts would be mitigated to a reasonable degree through the provision of compensatory tree planting and landscaping to the development

Neutral

- 8.7 The proposal would be of an acceptable design and scale which would not adversely impact the living conditions of neighbouring occupiers and subject to compliance with conditions would not adversely impact highway safety or increase the risk of flooding within the site or elsewhere.

Conclusion & Recommendation

- 8.8 The proposal would provide three additional dwellings in a sustainable location with good connections to Tewkesbury Town and associated services. There are no significant adverse material issues that would result from the proposal and the scheme would have an acceptable impact on the character and appearance of the area, highway safety and residential amenity. The application is therefore considered to accord with relevant Government Guidance and Development Plan Policies relating to new residential development and it is therefore recommended that the application should be **Permitted**.

CONDITIONS:

1. The works hereby permitted shall be begun before the expiration of five years from the date of this consent.

Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved documents:

- Drawing no.102_A and 103 received by the Local Planning Authority on 25th March 2020
- Drawing no.104 and 106 received by the Local Planning Authority on 26th August 2020
- Drawing no.6534/21 and Micro Drainage Calculations – ‘File 6534’ received by the Local Planning Authority on 22nd October 2020
- Drawing no.100_E received by the Local Planning Authority on 17th December 2020.

Except where these may be modified by any other conditions attached to this permission.

Reason: To ensure that the development is carried out in accordance with the approved plans.

3. The development hereby permitted shall be carried out in accordance with the materials scheduled on drawing no. 100_E received by the Local planning Authority on 17 December 2020

Reason: To ensure an acceptable appearance to the development.

4. No above ground development shall take place until the foul and surface water drainage provisions have been implemented in accordance with the details set out on drawing no. 6534/21, Micro drainage calculations – ‘File 6534’ received by the Local Planning Authority on 22nd October 2020.

Reason: To ensure acceptable drainage provision and to minimise the risk of flooding.

5. The hard and soft landscaping scheme as set out on drawing no.100_E shall be implemented concurrently with the development and shall be completed in accordance with the approved details no later than the first planting season following the completion of the development.

Reason: To ensure an acceptable appearance to the development.

6. Prior to commencement of built development the development hereby permitted details of a construction management plan or construction method statement shall be submitted to and approved in writing by the Local Planning Authority. The approved plan/statement shall be adhered to throughout the demolition/construction period. The plan/statement shall include but not be restricted to:

- Parking of vehicle of site operatives and visitors (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);
- Any temporary access to the site;
- Locations for loading/unloading and storage of plant, waste and construction materials;
- Method of preventing mud and dust being carried onto the highway;
- Arrangements for turning vehicles;
- Arrangements to receive abnormal loads or unusually large vehicles; and
- Methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.

Reason: In the interests of safe operation of the adopted highway in the lead into development both during the demolition and construction phase of the development.

7. No building or use hereby permitted shall be occupied or use commenced until the means of access for vehicles, pedestrians and/or cyclists have been constructed and completed in accordance with the approved plans.

Reason: In the interest of highway safety.

8. No building or use hereby permitted shall be occupied or use commenced until the car/vehicle parking area (and turning space) shown on the approved plan 100 Rev C has been completed and thereafter the area shall be kept free of obstruction and available for the parking of vehicles associated with the development.

Reason: To ensure that there are adequate parking facilities to serve the development constructed to an acceptable standard.

9. The development hereby permitted shall not be occupied until the cycle storage facilities have been made available for use within secure covered cycle sheds accommodating a minimum of 1 adult bicycle within rear gardens access via direct 1m minimum width pathways.

Reason: To ensure the provision and availability of adequate cycle parking.

10. The development hereby permitted shall not be first occupied until the proposed dwellings have been fitted with an electric vehicle charging point. The charging points shall comply with BS EN 62196 Mode 3 or 4 charging and BS EN 61851. The electric vehicle charging points shall be retained for the lifetime of the development unless they need to be replaced in which case the replacement charging point(s) shall be of the same specification or a higher specification in terms of charging performance.

Reason: To promote sustainable travel and healthy communities.

11. The development hereby permitted shall be carried out in accordance with the levels set out on drawing no.106.

Reason: To ensure an acceptable relationship with adjoining development.

INFORMATIVES:

1. In accordance with the requirements of the NPPF the Local Planning Authority has sought to determine the application in a positive and proactive manner by offering pre-application advice, publishing guidance to assist the applicant, and publishing to the council's website relevant information received during the consideration of the application thus enabling the applicant to be kept informed as to how the case was proceeding.
2. The development hereby approved and any associated highway works required, is likely to impact on the operation of the highway network during its construction (and any demolition required). You are advised to contact the Highway Authorities Network Management Team at Network&TrafficManagement@gloucestershire.gov.uk before undertaking any work, to discuss any temporary traffic management measures required, such as footway, Public Right of Way, carriageway closures or temporary parking restrictions a minimum of eight weeks prior to any activity on site to enable Temporary Traffic Regulation Orders to be prepared and a programme of Temporary Traffic Management measures to be agreed.
3. It is expected that contractors are registered with the Considerate Constructors scheme and comply with the code of conduct in full, but particularly reference is made to "respecting the community" this says:

Constructors should give utmost consideration to their impact on neighbours and the public

- Informing, respecting and showing courtesy to those affected by the work;
- Minimising the impact of deliveries, parking and work on the public highway;
- Contributing to and supporting the local community and economy;
- and
- Working to create a positive and enduring impression, and promoting the Code.

The CEMP should clearly identify how the principle contractor will engage with the local community; this should be tailored to local circumstances.

Contractors should also confirm how they will manage any local concerns and complaints and provide an agreed Service Level Agreement for responding to said issues.

Contractors should ensure that courtesy boards are provided and information shared with the local community relating to the timing of operations and contact details for the site coordinator in the event of any difficulties. This does not offer any relief to obligations under existing Legislation.

CEMP can include but is not limited to:

- A construction programme including phasing of works;
- 24 hour emergency contact number;
- Hours of operation;
- Expected number and type of vehicles accessing the site;
- Deliveries, waste, cranes, equipment, plant, works, visitors;
- Size of construction vehicles;
- The use of a consolidation operation or scheme for the delivery of materials and goods;
- Phasing of works;

- Means by which a reduction in the number of movements and-parking on nearby streets can be achieved (including measures-taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction):
 - Programming;
 - Waste management;
 - Construction methodology;
 - Shared deliveries;
 - Car sharing;
 - Travel planning;
 - Local workforce;
 - Parking facilities for staff and visitors;
 - On-site facilities;
 - A scheme to encourage the use of public transport and cycling;
 - Locations for loading/unloading, waiting/holding areas and means of communication for delivery vehicles if space is unavailable within or near the site;
 - Location for storage of plant/waste/construction materials;
 - Arrangements for the turning of vehicles, to be within the site unless completely unavoidable;
 - Arrangements to receive abnormal loads or unusually large vehicles;
 - Swept paths showing access for the largest vehicles regularly accessing the site and measures to ensure adequate space is available;
 - Any necessary temporary traffic management measures;
 - Measures to protect vulnerable road users (cyclists and pedestrians);
 - Arrangements for temporary facilities for any bus stops or routes;
 - Highway Condition survey;
 - Method of preventing mud being carried onto the highway; and methods of communicating the Construction Management Plan to staff, visitors and neighbouring residents and businesses.