

DESIGN & ACCESS STATEMENT

**PROPOSED RESIDENTIAL DEVELOPMENT
STATION ROAD, WOMBWELL,
BARNSELY**

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1.0 Introduction

Chris Carr Associates have been instructed by Red Kite Property Management Ltd to prepare design proposals in support of an Outline Planning Application for new build residential development on land within the Station Road Industrial Estate, Wombwell, Barnsley.

The current occupiers of the site are Windowstyle UK, a part of the Style Group, the largest independent replacement window retailer in the UK. The company operates from two adjacent sites within the Station Road Industrial Estate but has expanded rapidly to a point where the overall site is no longer capable of servicing the company's requirements. It has become necessary to consider total relocation to a purpose-built facility, and partial redevelopment of the land at Station Road for residential purposes is necessary to provide funding for the relocation.

An initial Planning Application (Ref 2008/0405) was withdrawn to allow the applicants time to consider various detailed matters raised by the Planning Authority. This design and access statement, the attached drawings and specialist reports that accompany the re-submission have addressed those issues.

2.0 Site Assessment

Windowstyle UK has confirmed a commitment to remain in Barnsley subject to being able to obtain residential Planning Permission. The following statement has been compiled in accordance with Circular 01/06 Guidance on Changes to the Planning System and the advice given by CABE in their document "Design and Access Statements". It provides detailed background information, a comprehensive site assessment and description of the design proposals. The statement incorporates specialist advice in respect of landscaping, drainage and a flood risk assessment that should be read alongside additional reports including a planning statement, Phase 1 site investigation and highways assessment.

2.1 Site Location

Site location plans are attached at Appendix 1.

Windowstyle UK currently occupies two sites located at Station Road Industrial Estate, Wombwell. The sites are sub-divided by Valley Road which provides the main access to the surrounding industrial estate.

The site is well located on the outskirts of Wombwell and close to the A633 Wombwell by-pass. Station Road connects Wombwell with Darfield and through its connection with the Wombwell by-pass provides an excellent link to Barnsley and Rotherham.

To the South West of the site, there is a sports ground and to the East and South East existing residential development. The site is sustainably located with regular bus services to Barnsley, Hoyland, Wombwell, Darfield and Great Houghton. The site is close to the shops and services of Wombwell and Darfield with schools, banks, medical centres, dentists and other facilities all available within one mile.

2.2 Background

Windowstyle was established in 1997 to provide manufacturing facilities for its subsidiary, Safestyle UK Ltd, the largest independent replacement window retailer in the UK. Both companies are subsidiaries of Style Group UK Ltd.

The business in Wombwell has grown rapidly and currently employs four hundred and fifty local people. The company operates twenty four hour working in three shifts over five days and produces an average of 6,200 window frames per week. Most of the staff live in the local area.

2.2.1 Existing Manufacturing Facilities

The company is profitable and has consistently reinvested profits into new plant and additional manufacturing facilities. The present site on the Station Road Industrial Estate can be divided into two parts.

Site A - Area: 3.15 Ha

Currently occupied by Unit 2 Valley Road, this is the main manufacturing factory comprising 66,000 sq ft of single storey production space. The factory is currently working to capacity and is involved with PVC frame assembly.

Site B - Area: 0.72 Ha

Currently occupied by Valley Court Units Nos 1-15; these smaller units are adjacent to but separate from the main unit in Valley Road and includes nine separate manufacturing units comprising 56,250 sq ft. These units undertake glass toughening and provide offices for the business. An additional three industrial units comprising 3,750 sq ft are let to external parties. All units are currently working at full capacity.

A site plan is attached at Appendix 2.

2.2.2 Limitations on Future Growth

Windowstyle UK have identified a number of specific problems associated with the existing facilities. These are set out below:

1. The geographic constraints of the site will limit the company's five year expansion plan. There is very limited available development land adjoining the existing business and even if this was fully developed, it would not provide sufficient space nor solve the other issues that result from site separation.
2. The movement of frames from Unit 2 to the glass manufacturing units in Valley Road is unsatisfactory and inefficient.
 - Production involves the crossing of a public highway, which has traffic risks and is costly. Nine employees are directly involved in this process which could be automated if manufacturing was centralised within the same premises.
 - Any movement of frames involves the potential for damage which results in unnecessary re-makes and dissatisfied customers.
 - Due to the potential risk of damage, additional packing material is required and the company has already invested in special equipment and employee training to reduce the accident risk.
 - Communication between the two sites is difficult and results in loss of production efficiency.

- Flexibility of the workforce is considerably reduced as staff become familiar with either PVC production or glass production. Within one site, rotation of duties ensures greater flexibility and variety for the staff.
 - Multi-site operations, however close, require a management and supervisory structure which is larger than would be necessary in a single site.
 - The current site layout with public access across the site has led to vandalism, some of which has been very serious (arson). The company now requires a fully secured, gated site to reduce security costs and the disruption caused by vandalism.
3. The present lack of capacity at Station Road involves large amounts of raw material being stored outside. This results in damage from the weather (eg frost) and increases the potential losses associated with theft and vandalism.
 4. Car parking is totally inadequate for the site and many employees currently park on the adjoining public highway.

2.2.3 Future Requirements

The following specification indicates the level of facilities that are required to address the company's current problems.

- A single purpose-built manufacturing facility with up to 200,000 sq ft of accommodation and an eaves height of at least 6m. Raw material and storage would be contained within the building and the facility would have the capacity to deliver sales (retail value of approximately £200m per annum).
- On-site secure car parking.

2.2.4 Potential Benefits to Windowstyle UK

Relocation to a modern, efficient production facility as described above would have huge financial benefits for the company. These include:

- Simplified management structure with an estimated saving of at least £150,000 per annum.

- More efficient production handling, reducing damage and time saving, with an estimated saving of up to £250,000 per annum.
- Increased employee flexibility and reduced risk of accidents. Estimated costs of £50,000 per annum.
- Reduced power, rates and water costs through more efficient use of the building. Estimated saving of £100,000 per annum.
- Reduction in current security charges and reduction in stored materials being stolen. Estimated saving £150,000 per annum.
- Lower building and plant maintenance costs. Estimated saving £50,000 per annum.

It is estimated that total cost savings could be as high as £750,000 per annum.

2.2.5 Potential Benefits to Barnsley Metropolitan Borough Council

The company's relocation within the Barnsley district would be highly advantageous to the Council through:

- Improved productivity will allow expansion of the business, boosting the number of local jobs with the company to approximately six hundred and ten and with the potential to increase to seven hundred and fifty-plus by 2011.
- The provision of a new purpose-built manufacturing facility providing first class working conditions for local people, both highlighting and assisting a vibrant local economy.
- Higher rates and waste disposal charges derived from a modern manufacturing facility.

2.2.6 Windowstyle UK is part of a fast-moving, financially successful group which sources all its manufacturing and other services from within the UK. Its business model sets out a continuing policy of retaining a UK base and group turnover of £110m is set to increase to over £200m within five years. This will involve both organic growth and the likely acquisition of competitor brands. Following such acquisition, it is proposed to centralise production and distribution in Barnsley if appropriate facilities can be provided.

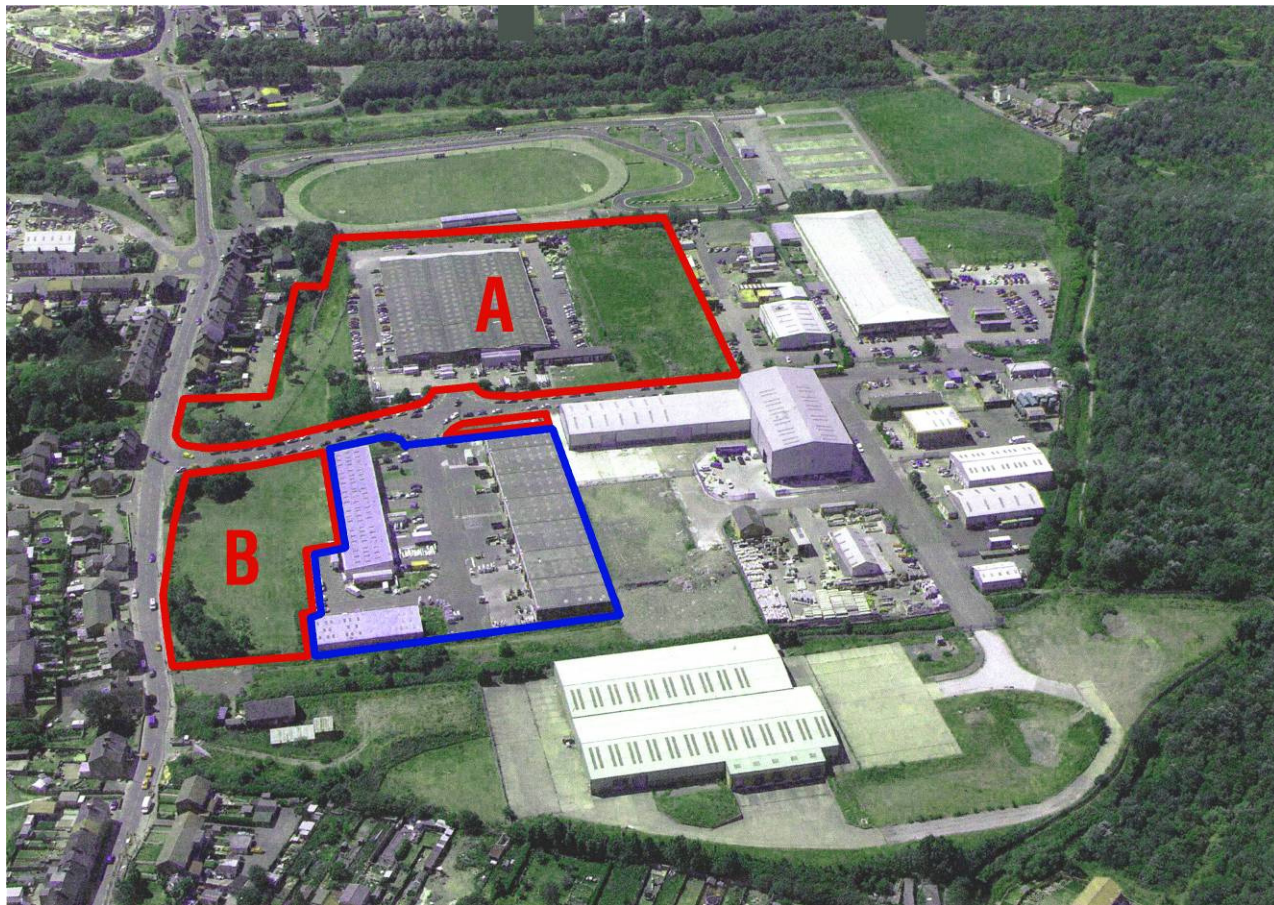
To achieve the company's growth plan, it must now plan future manufacturing needs and seek a new and purpose-designed production facility. The company is willing to enter into a planning obligation which links the granting of Planning Permission for residential development at Station Road with relocation of Windowstyle UK to a new facility within Barnsley. The planning obligation would also cover other matters including affordable housing, the provision and management of open space and an education allowance.

2.2.7 Prior to submitting a Planning Application, Windowstyle UK and its retained consultants have been involved in informal discussions with the Barnsley Development Agency and the Council's Planning Department. Whilst pointing out that residential development within the Station Road Industrial Estate would normally be contrary to Planning Policy, it has been accepted that the company's future development plans cannot be met on the Wombwell site and that Windowstyle UK need to relocate to a new purpose-built facility. The Council is anxious to support the company with its expansion plans but has already indicated that there would be very little grant assistance available to help the substantial costs involved. The grant of Planning Permission for residential development of a part of the land at Station Road will provide critical finance for the redevelopment proposals.

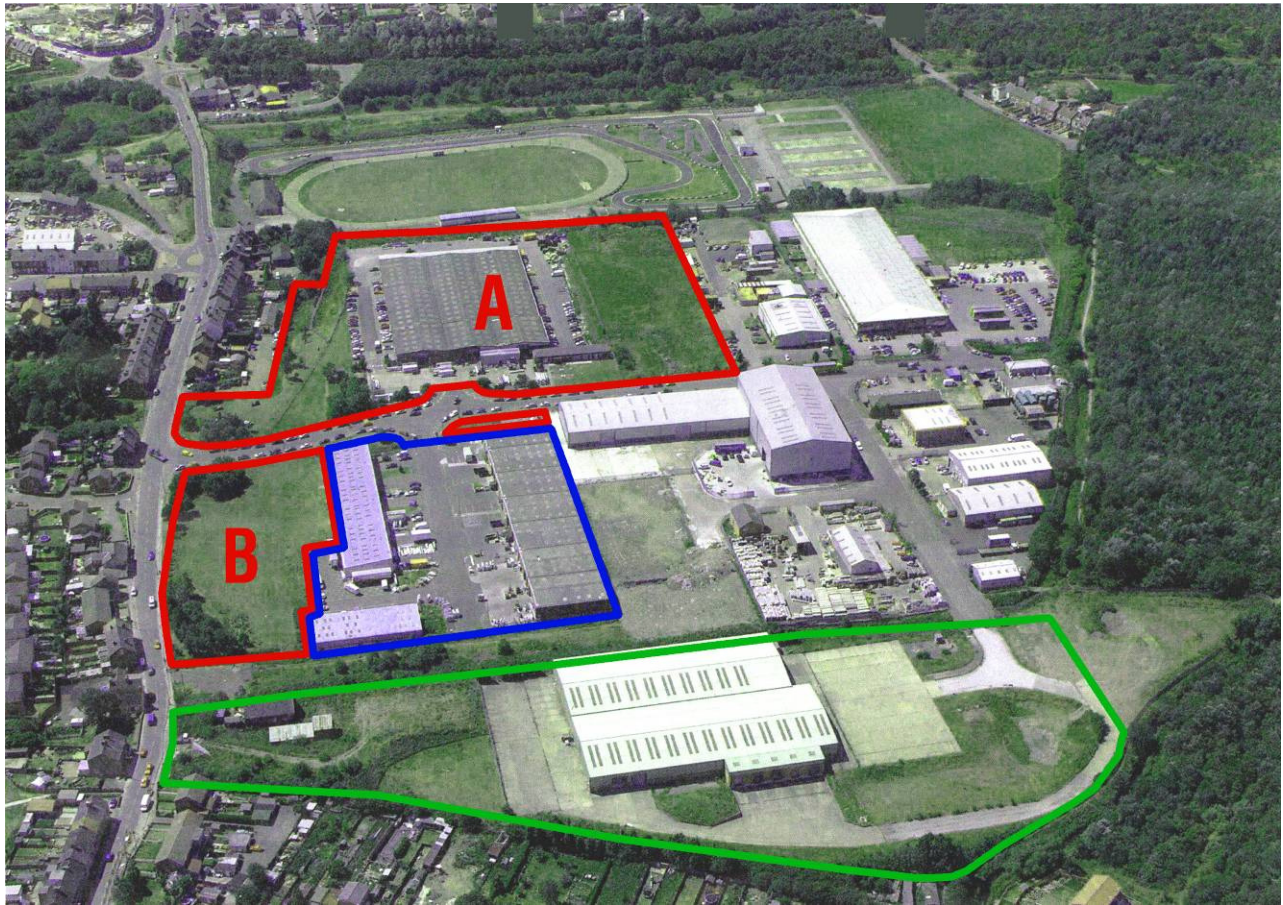
2.2.8 Planning Permission was granted at appeal in April 2007 for residential development of the Rafahart land to the North East of the site. The Application was initially refused by Barnsley Metropolitan Borough Council on the grounds of loss of employment land and noise and disturbance from nearby industrial and commercial uses. The inspector made a number of points pertinent to the consideration of the Windowstyle proposals and came to the conclusion that the loss of land on the Station Road site amounted to a very small proportion of the total employment land supply, that future living conditions would not be jeopardised as existing industrial uses tended to be quiet, low-key operations and that the Council would have control over detailed siting and design of new dwellings.

2.3 Photographic Survey

The following photographic survey illustrates typical views of the site, the existing production facility and the surrounding area. Aerial photographs illustrate the site's relationship with adjoining residential development and the existing sports ground.



1. Aerial view of the site with the boundary illustrated in red and land within the Applicant's ownership highlighted in blue.



2. Aerial view of the site taken from the East to illustrate the proposed residential site A bounded in red, the proposed public open space and flood storage facility, site B with boundary in red, other land within the client's ownership with boundary in blue and existing industrial premises in the foreground which currently has the benefit of Detailed Planning Permission for residential development illustrated with the boundary in green.



3. Aerial view of site A taken from the junction of Station Road and Valley Road to illustrate the existing factory premises and on-street car parking.



4. Aerial view taken from the junction of Station Road and Valley Road to illustrate the existing industrial premises with junction landscaping in the foreground, the sports ground in the background and on-street car parking over the whole length of Valley Road.



5. Approach to the site on Station Road from the A633 Wombwell by-pass illustrating existing terraced housing to the West of Valley Road.



6. Frontage to Station Road illustrating the junction with Valley Road, frontage landscaping and the existing bus stop.



7. Views over the adjoining sports ground to the Station Road Industrial Estate in the background.



8. The sports ground to the West of the site.



9. Existing residential development within the immediate area.



10. Frame assembly plant (site A) illustrating security fencing and extensive external material storage.



11. Frame assembly plant (site A) illustrating security fencing and extensive external material storage.



12a. Existing buildings, Nos 1-15 Valley Court providing glass toughening and office accommodation.



12b. Existing buildings, Nos 1-15 Valley Court providing glass toughening and office accommodation.



13. On-street car parking obstructing the junction of Station Road with Valley Road and the full length of Valley Road throughout the adjoining industrial development site.



14. On-street car parking obstructing the junction of Station Road with Valley Road and the full length of Valley Road throughout the adjoining industrial development site.

2.4 Measured Survey

A detailed survey of the site has been undertaken by Survey & Site Services. This accurately records the position of existing buildings, landscaping, boundary treatments and includes a comprehensive grid of levels. The topographical survey has helped inform the design process and has provided detailed information to assist with the drainage and flood risk assessment.

A copy of the topographical survey is attached with the Planning Application.

2.5 Phase 1 Site Investigation Report

A Phase 1 site investigation report has been prepared by Eastwood & Partners, consulting engineers. The report considers the site's history, past uses, existing uses, ground conditions, possible mining operations and the potential effects of landfill gas, flooding and contamination.

The report concludes that past development has resulted in made ground over a large part of the site and that piled foundations will be the most economic solution. Basic Radon protection precautions will be required and a full gas risk assessment should be undertaken. Fill material beneath the site is likely to be contaminated and further chemical tests will be required prior to development. The regulatory authorities may require gardens and/or landscaped areas to be capped with clean, imported material.

Eastwood & Partners have highlighted the fact that Site A is within a flood zone as indicated by the Environment Agency flood zone maps. The flood zone maps are indicative only and do not take any account of detailed site topography. A separate drainage and flood risk assessment has been prepared which confirms that levels throughout Site A are well in excess of the maximum anticipated flood level.

A copy of the Phase 1 site investigation report is included as part of the Planning Application.

2.6 Drainage and Flood Risk Assessment

A drainage and flood risk assessment has been prepared by Stevenson Associates. This highlights the position with regard to existing foul and surface water sewers and pays particular attention to site levels and the potential risk caused by flooding. The report concludes that adequate drainage connections are available and makes recommendations with regard to discharge of both foul and surface water sewage from the site. The report demonstrates that the whole of Site A, which it is proposed should be developed for residential purposes, is at a higher level than the maximum predicted flood level, and that the rate of surface water discharge from the proposed residential development would be less in volume terms than that which currently discharges from the industrial premises.

The report investigates potential flooding of land within Site B and demonstrates that the construction of a new feature balancing pond would provide more than adequate storm water storage.

The report concludes that future residential property can be protected from flooding and that the development will not cause other surrounding properties to flood. Moreover, the proposals are an improvement on existing drainage for the site and will provide some flood alleviation to other properties in the area.

The Environment Agency has confirmed that the proposed residential development site is not subject to flooding.

A drainage and flood risk assessment by Stevenson Associates is attached with the Application.

2.7 Planning Statement

A planning statement has been prepared by Lynne Barker Ltd. The statement considers current site operations, site context, planning policy, planning history and makes an assessment of the proposals against SPG24.

The statement concludes that the proposed redevelopment of the site at Station Road, Wombwell will result in the retention and expansion of a substantial company that will continue to work in Barnsley, improving the working environment, retaining and enhancing employment, benefiting local businesses, removing traffic congestion,

making efficient use of a brown field site, contributing to the Government's objectives for house building in a sustainable location and providing a sustainable drainage solution. The loss of a small proportion of employment land will not be prejudicial to the Council's overall objectives in the wider context of an over-supply of employment.

By granting Planning Permission for the redevelopment, the Council will retain a substantial company with enhanced employment prospects, maintain a realistic view of employment land supply, meet the Government's targets for house building and make efficient use of a brown field site.

A Planning Statement by Lynne Barker Ltd is attached with the application.

2.8 Section 106 Legal Agreement

A draft Section 106 Legal Agreement has been prepared and a copy is attached with the Planning Application. The Agreement covers the issues of employment, open space and affordable housing.

2.9 Transport Assessment

A transport assessment has been prepared by Bryan G Hall, consulting civil and transportation engineers.

The assessment concludes that there are existing highways, traffic and environmental difficulties caused by the existing factory as a result of noise, traffic and general disturbance caused by twenty four hour working with shift changes at unsociable hours. There is a significant shortage of on-site car parking which results in major congestion on Valley Road and Station Road. The assessment indicates that proposed residential development over Site A will have no material impact on the local highway network in the design year 2013. The results of the assessments also show that the Station Road/Valley Road junction will operate well within capacity in the design year 2013.

The quality of existing public transport provision and pedestrian and cycle linkages with surrounding areas are described and it is concluded that the proposed development will further the aims and objectives of the Government's sustainable

transport policies in respect of both public transport usage and the opportunity to walk or cycle to the development.

It is concluded that the proposed development will have no significant effect on the operation of the local highway network and that highway issues do not represent a material consideration in determining the Planning Application.

A copy of the transport assessment by Bryan G Hall is attached with the application together with an addendum which addresses specific issues raised by the Highway Authority.

2.10 Landscape Assessment Report

An assessment of existing landscaping and development impact study has been undertaken by JCA Ltd, arboricultural consultants. The assessment concludes that the proposed development will allow for the retention of existing trees surrounding the site and that the proposed residential development will not have any detrimental impact upon those trees. Advice is provided with regard to new buildings within the vicinity of trees.

A copy of the consultants' report is attached with the application.

2.11 Landscape Proposals

A landscape assessment and proposals have been prepared by Popplewell Associates, chartered landscape architects. The assessment considers the proposed residential development and advises on additional supplementary landscaping and tree planting surrounding the development on Site A and throughout the public open space and flood storage facility within Site B, and the remainder of the site.

A copy of the consultants' report is attached with the application.

2.12 Sound Survey

A sound survey has been prepared by S & D Garritt Ltd. This includes an initial survey and assessment and takes account of ongoing negotiations with the

Environmental Health Department. The report concludes that noise generated from the surrounding area and, in particular the adjoining sports ground, will not compromise acceptable residential standards.

A copy of the report is attached with the application.

3.0 The Design Proposals

3.1 Design Concept

The design concept adopted for this site has been to:

- Provide a mix of new build housing, including one and two bedroomed apartments, two, three and four bedroomed town houses and a small number of four bedroomed detached properties, aimed at creating a new build residential development which meets local housing need and provides residential accommodation for first time buyers, single people, couples, families and the retired.
- To satisfy the requirements with regard to the provision of affordable housing.
- Develop the site in such a way that the new buildings compliment the site's location, link naturally with adjoining residential property to the South and follow the principles established in "Manual for Streets".
- Respond to the scale of the surrounding area with a mix of new buildings between two and three storeys in height.
- Produce a landscape setting which will enclose the residential development and provide both visual and sound separation from adjoining industrial premises. To utilise site landscaping to enhance existing residential property to the South, to link the site more closely with the green space of the adjoining sports ground and to screen the remaining industrial premises when viewed from high ground to the West.
- Create an area of public open space adjoining Station Road which will fulfill the developer's obligations with regard to this site and to provide a public amenity which links proposed housing with existing housing.
- Ensure that the new development has no detrimental impact on the adjoining highway network, that it removes car parking from Valley Road thereby

improving traffic flows throughout the industrial estate, and that car parking is provided to all new dwellings in accordance with the advice within "Manual for Streets".

- Produce a scheme that is urban in character and that is as sustainable as possible with a mix of properties which not only meet the immediate needs of the occupiers but also provide them with a home that they can remain in long-term (ie a "home for life").

Drawing No 21/75/P1D, submitted with the Planning Application, illustrates design concept proposals and is submitted for illustrative purposes only.

An analysis of the site's constraints and critical design issues is attached at Appendix 3.

3.2 Use

The proposed use is residential and will include for affordable houses.

In accordance with PPS3, the proposed development will deliver a mix of high quality, well designed houses, built to a high standard and with significant landscaping. The site is in a sustainable location with good public transport links and access to nearby facilities. The development will make efficient use of a brown field site for housing, making a contribution towards Barnsley's increased housing targets and the Government objectives for house building in a sustainable location.

The density of the development will satisfy the national minimum standards set out in PPS3 with a nett density of not less than fifty seven dwellings per hectare of developable land (excluding peripheral landscaping); making the best use of land in this location.

3.3 Amount

The design concept proposals illustrate a development of one hundred and thirty seven dwellings. Final numbers will be subject to review by the chosen developer and are likely to be between one hundred and thirty/one hundred and sixty dwellings. Dwelling types and sizes will be appropriate for local housing need, providing a mix of property type ranging from one and two bedroomed apartments

to town houses and detached properties providing two, three and four bedroomed accommodation.

3.4 Access

Vehicular access to the site will be from Valley Road. The existing industrial access will be closed and a new access provided at a raised platform, which provides clear separation of residential and industrial traffic. A secondary access/egress to Valley Road is shown 135m to the North.

Internally, the design concept proposals anticipate a road system which reflects a traditional urban form. The site lies close to the centre of Wombwell, where the historic character of the town is formed by a street pattern dominated by a mix of terraced and town houses, mews courtyards and a formal streetscape rather than a "looser" suburban form.

Pedestrian access throughout the development should provide a positive and attractive link between streets and mews courts and a direct route to Station Road and the proposed public open space within Site B.

The footpath network and the pattern of streets should allow for safe pedestrian access throughout the site, good links to public transport and connectivity to the proposed public open space and possible future off site sports, recreational and communal facilities.

3.5 Layout

The design concept proposals drawing 21/75/P1D illustrates a suggested layout for the development. The layout has been designed to continue the simple, linear form which is typical of the adjoining urban area with apartments, terraced town houses and detached dwellings, taking access from a system of formal streets and adjoining mews courts. Dwellings on the two principal access roadways are set back from the roadway to allow for frontage landscaping and a formal avenue of trees. Car parking is provided within a mix of integral garages, frontage parking and internal parking courtyards. All properties are provided with private gardens. Refer to Drawing No P1 Rev D for illustrative layout.

3.6 Scale

It is anticipated that development of the land adjoining Station Road will be a mix of two and three storey properties. Houses will be of standard domestic proportion with terraces of between three and eight dwellings. Accommodation is aimed at providing traditional family houses through a mix of two, three and four bedroomed properties.

3.7 Appearance and Materials

Detailed proposals with regard to appearance and materials are not submitted in support of this Outline Planning Application. It is anticipated that new houses will be constructed in brick and with dark grey tiled roofs.

3.8 Landscaping

A landscape statement has been prepared by Popplewell Associates, chartered landscape architects, and is attached with the planning application.

Landscaping proposals for the site will include the planting of a substantial, partially bunded shelter belt surrounding Site A which will include the retention of existing trees and supplementary tree and shrub planting to ensure visual and aural separation from adjoining uses, enhance privacy and amenity and provide an attractive setting for the proposed new housing.

A substantial area of public open space is proposed within the frontage to Site B which is to include the retention of existing trees and supplementary planting with new trees, shrubs and boundary hedges. Shallow excavations over a part of the area will allow for enhanced flood water storage, and material from the excavations is to be used to create a new bund to the South of retained industrial units which, together with associated new planting, will provide a visual screen to Station Road.

All common areas of landscaping within the public open space and the shelter belts surrounding the proposed residential development will be subject to management and future maintenance by a formal management company set up for that express purpose. The management company will be responsible for regular grass cutting,

the maintenance and improvement of trees and shrubs and the replacement of any planting which should die during the initial three years following establishment.

3.9 Sustainability

When considering proposals for redevelopment of the Station Road site, the owners have been mindful of current Planning Policy for climate change and the need to ensure that their proposals play a part in the Government's wider social, environmental and economic objectives and for sustainable communities.

The following Planning Policies apply:

PPS1 : The location and design of the residential development should meet the objectives of PPS1. The site is in a sustainable location, close to the centre of Wombwell, adjoining a major trunk road and is well served by public transport and local facilities.

PPS3 : Proposed new housing should be well designed, should make the best use of land by achieving a high residential density, should provide houses for all age groups and should make use of new building technologies to deliver a sustainable development.

The proposals should reduce the need to travel, and encourage residential development in an area already well served by public transport, local facilities and employment prospects.

PPG13 – Transport : The proposals should reduce the need for travel, especially by car, by fostering development which encourages walking, cycling or public transport. The site is in a highly sustainable location and will meet these objectives.

PPS25 – Development and Flood Risk: The proposed development should not impact upon existing flooding within the Dearne Valley, should not be built within a flood plain and should demonstrate a contribution by maintaining and, if possible, reducing surface water off-site flows.

4.0 Summary

The proposed residential development will achieve a number of benefits to Barnsley.

- The retention and expansion of a major company who are proposing substantial investment in a new purpose designed manufacturing facility which will not only secure five hundred and sixty jobs but will provide further employment opportunities in the future.
- The redevelopment proposed by Windowstyle UK will be sited in Barnsley and will enhance the Borough's reputation by providing modern, manufacturing premises with facilities that encourage and cater for a local workforce.
- The retention of a local business which sources materials and facilities from the immediate area and, through this activity, makes a major contribution to the economic well-being of the Borough.
- The removal of major traffic congestion from the area surrounding Station Road and Valley Road which is currently subject to excessive on-street parking due to a lack of on-site facilities.
- The redevelopment of a brown field site for housing, making a contribution towards Barnsley's increased housing targets and the Government's objectives for house building in a sustainable location. To helping achieve these targets whilst, at the same time, protecting and enhancing existing employment within the Borough.
- Providing a sustainable drainage system which will reduce the volume of surface water discharge and have a beneficial impact on flood water storage in the immediate area.
- By creating a substantial area of well landscaped public open space which is available both to new housing and existing residential property throughout the immediate area in a highly visible frontage location adjoining Station Road where it will have the added benefit of screening existing industrial uses and greatly enhancing streetscape.

It is considered that the proposal represents a suitable site for housing which will not result in a shortage of supplied employment land and will meet the requirements of national, regional and local planning policy. Residential development and the associated landscaping will act to greatly improve the amenity in this part of the Dearne Valley and will allow for new housing to be constructed in a sustainable location, in close proximity to Wombwell town centre, public transport facilities, local amenities and employment opportunities. We believe the Council should look favourably upon this Application and grant Planning Permission.

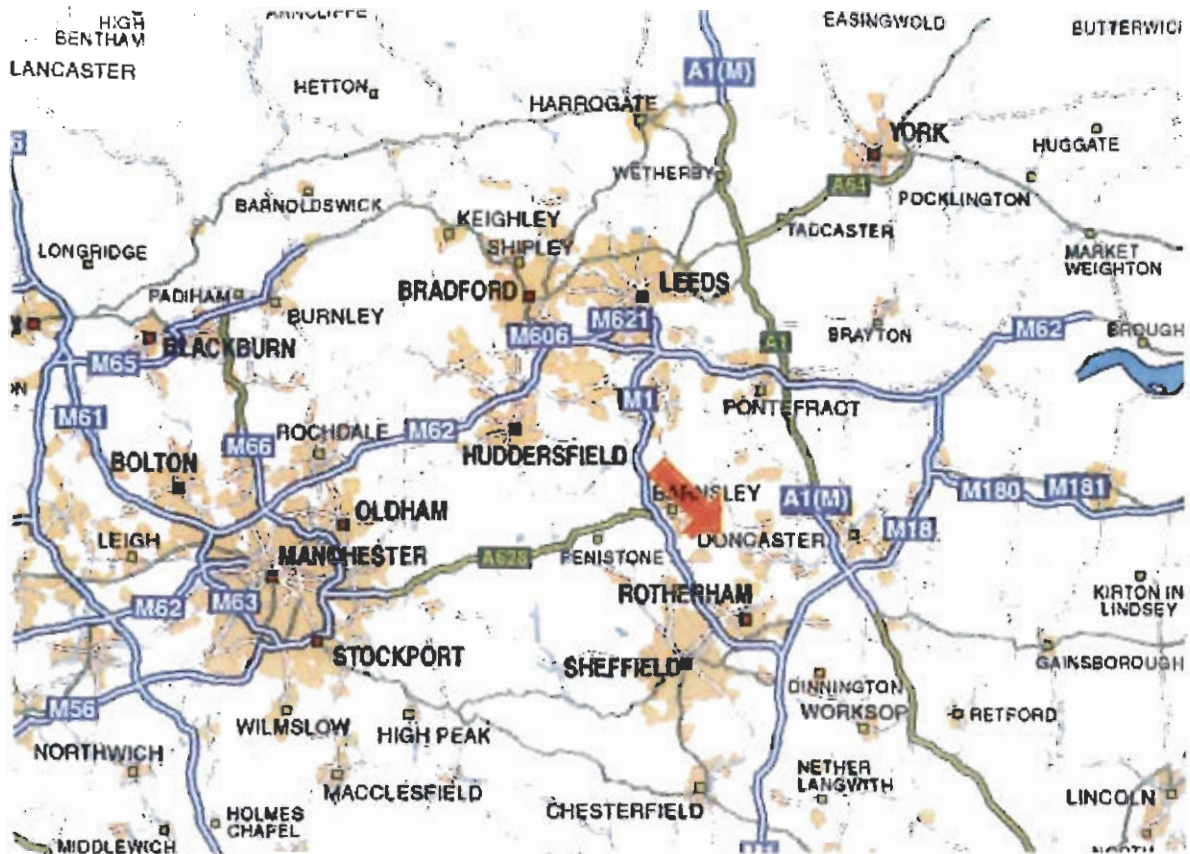


Signed.....

FOR CHRIS CARR ASSOCIATES

APPENDIX 1

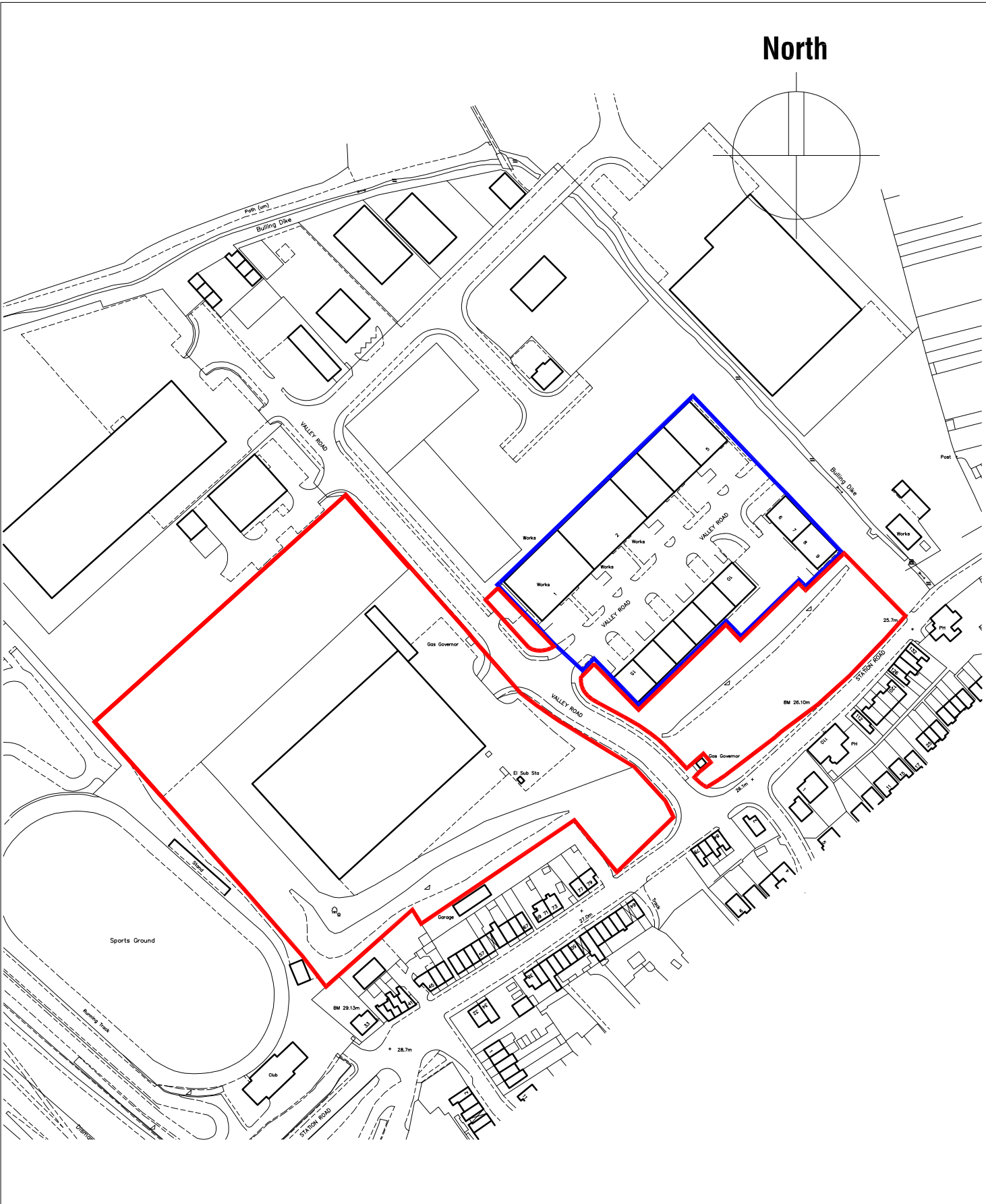
LOCATION PLANS



SITE LOCATION PLAN

APPENDIX 2

SITE LOCATION PLAN



WINDOWSTYLE UK LTD
STATION ROAD
WOMBWELL

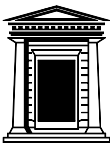
LOCATION PLAN

Scale 1:2500

Date Dec 07

Ref 21.75

Drwg No OS1 Rev A



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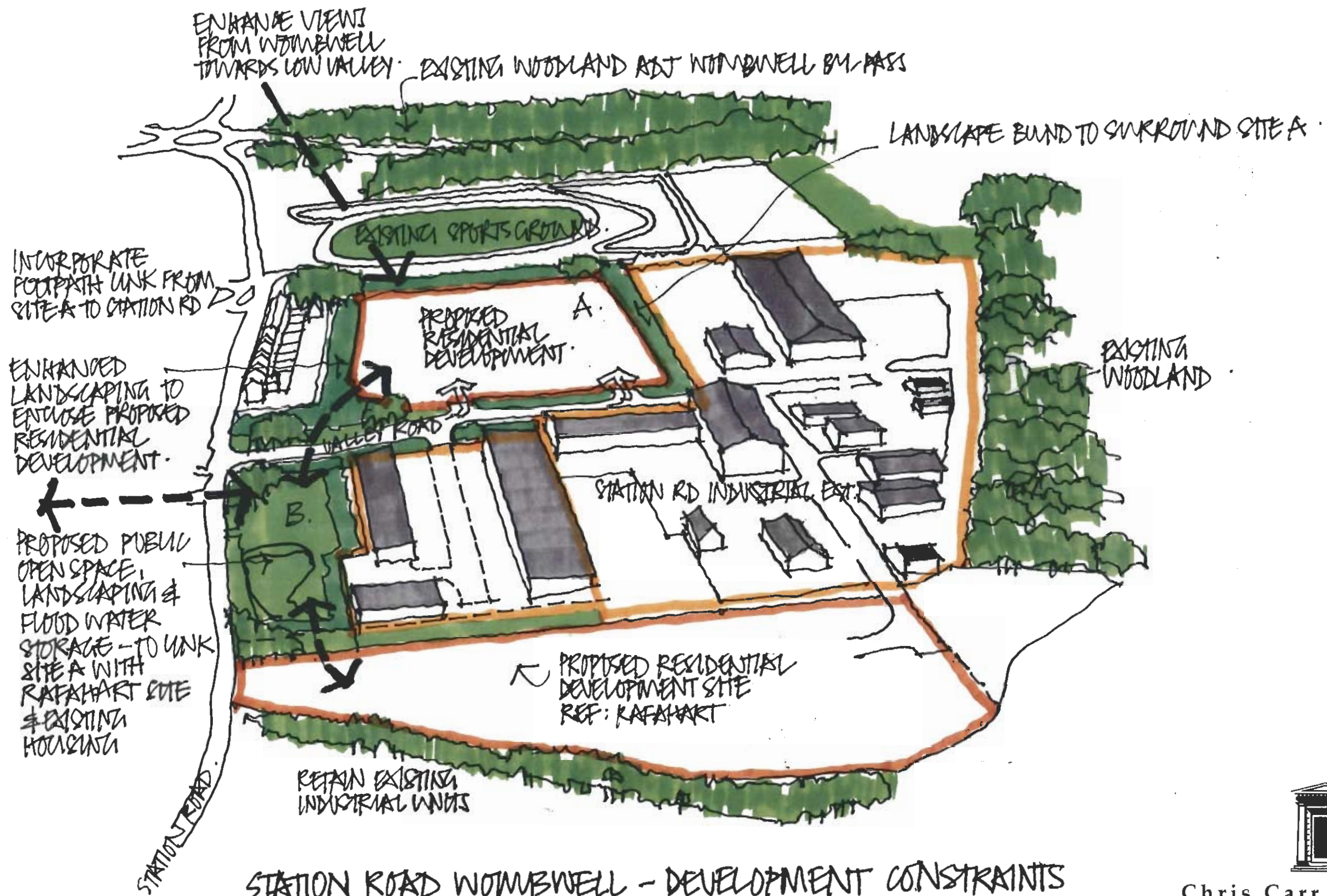
Tel: 01226 286256 Fax: 01226 207304
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APPENDIX 3

**SITE CONSTRAINTS AND
APPRAISAL**

DO NOT SCALE

*All Dimensions in Millimetres
unless specified otherwise
and subject to verification
on site.*



STATION ROAD WOMBWELL - DEVELOPMENT CONSTRAINTS



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