

- a) **DOV/22/01341 - Erection of a detached dwelling, new vehicular access, associated parking and landscaping - Land Next to 95 St George's Road, Sandwich**

Reason for report – Number of contrary views (76 including Sandwich Town Council)

- b) **Summary of Recommendation**

Planning permission be granted.

- c) **Planning Policy and Guidance**

Core Strategy Policies (2010): CP1, CP6, CP7, DM1, DM13, DM25

Land Allocations Local Plan (2015): DM27

Local Plan (2002) Saved policies: None

Draft Dover District Local Plan (March 2023) – The Submission Draft Dover District Local Plan is a material planning consideration in the determination of applications. At submission stage the policies of the draft plan can be afforded some weight, depending on the nature of objections and consistency with the NPPF. Draft policies SP1, SP2, SP3, SP4, SP5, SP11, SP12, SP13, SP14, SP15, CC1, CC2, CC4, CC5, CC6, CC8, PM1, PM2, PM3, PM4, PM5, PM6, H1, TI1, TI2, TI3, TI5, NE1, NE2, NE3, NE4, HE1, HE2, HE3

National Planning Policy Framework (NPPF) (2023): Paragraphs 2, 7, 8, 11, 38, 47-48, 55-57, 60 – 66, 84, 87, 114-116, 128, 132, 135 - 140, 173, 174, 180, 182, 186, 188, 191, 194, 200-213

National Design Guide & National Model Design Code (2021)

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended): Section 72(1)

- d) **Relevant Planning History**

Various applications relating to the school and its grounds, most recently including: DOV/21/01314 – Construction of a sports pitch, erection of a two-storey pavilion, new vehicle access, additional 20no. car parking spaces, fencing, lighting, drainage and ancillary works – Granted

DOV/23/00365 - Variation of condition 2 (approved plans) to vary sports pitch design of planning permission 21/01314 (Section 73) Construction of a sports pitch, erection of a two-storey pavilion, new vehicle access, additional 20no. car parking spaces, fencing, lighting, drainage and ancillary works – Granted

- e) **Consultee and Third-Party Representations**

Representations can be found in full in the online planning file. A summary has been provided below:

Sandwich Town Council – object, should be refused on the basis of an incomplete application, missing POS, biodiversity assessments/protected species survey, tree officer report (**Officer comment:** further information was subsequently submitted by

the agent). Impact on the conservation area, some habitat and species are legally protected and included on the Section 41 NERC lists and Kent Biodiversity Strategy. Tree preservation or conservation orders on nearby trees and hedges. Shadow light requires investigation, neighbour objects on the basis of the 45 degree rule. Surface water flooding, environment surveys, no contextual drawings provided. Should consider blanket TPO on site to secure retention of trees until survey is forthcoming, appears to contravene strategic and NPPF policies. Strongly object to the application siting material planning consideration including loss of light, negative impact on biodiversity and loss of trees.

DDC Planning Policy Team - site is within a large designation for Open Space which covers all of the playing fields at Sir Roger Manwood's School (site reference 233 for Open Space). It was refined ahead of the Reg19 consultation to ensure only green spaces were covered by the designation but is otherwise proposed to be retained as Open Space under PM5 of the Reg19 Plan. The site the subject of application is a wooded corner of the playing field so is not in use for any form of play- therefore public benefit would be due to the presence of the trees on site. The KKP OS reports do not mention site 233 specifically and since it has been protected as part of a site for sports and recreation, it doesn't appear to me that the quantum associated with each OS typology can be applied in this case. Conversely, the Playing Pitch Assessment Report identifies that Manwoods is currently home to a small, non-floodlit Astro and as a result the school exports training and match demand to Polo Farm Sports Club in Canterbury. The report notes the limited development of hockey in secondary schools in Dover District which means there is a lack of players feeding into the Club teams in the District. Therefore attribute the greater community benefit to the sports facility and would be minded to accept the loss of the area of Open Space, since the Planning Statement submitted establishes that development of the site will directly fund the provision of the pitch. The loss of the smaller area of open space designation appears to meet the requirements of Part b of PM5, in that the enhancement of the remainder of the existing site provides a net benefit to the community in terms of sport and recreation opportunities.

Concur that the loss of the smaller area of open space designation appears to meet the requirements of Part b of PM5, in that it the enhancement of the remainder of the existing site provides a net benefit to the community in terms of sport and recreation opportunities. This advice is subject to the assessment of the area of OS to be lost though taking into account the advice from consultees such as the Tree officer, Open Space Team and Sports England as to the area's value and whether they consider it meets any of the criteria under 1-3 of PM5 which warrants specific protection.

DDC Heritage – not considered that this application requires specialist input in respect of the built historic environment. Asked to ensure that the proposals are considered with reference to the relevant paragraphs of the NPPF.

DDC Tree and Horticulture – Initially objected in the absence of a pre-development tree survey/report. Noted that prior to the submission of the application, the site was cleared of the majority of trees and recent excavation may have affected the roots of trees to the rear. Those within the site that are remaining are now the subject of a blanket tree preservation order. Application form claims that there are no trees at the site, yet proposed block plan shows trees at the site; it is not clear whether these are existing or proposed new planting.

Following further information, advised the submitted tree survey/report recommends the removal of the remaining trees (identified as category C) as well as the hedgerow to the front which is rather disappointing. Trees on the land to the rear (TPO/23/00010), and those adjacent to the south western boundary could be subject to post-

development pressure (due to shading of the rear garden of the proposed dwelling, dropping of leaf litter etc.), whilst addressed in the AIA section of the tree report, it concluded that such nuisances are not likely to pose a significant issue. Suggest a condition for a robust replanting scheme of native species, together with the planting of a new native hedge along the front boundary.

DDC Senior Natural Environment Officer - The Preliminary Ecological Appraisal (PEA) identifies potential for ecological impacts as a result of proposals and implementation of precautionary mitigation for impacts (to nesting birds, reptiles, badgers and hedgehogs) during site and vegetation clearance and construction is recommended. The recommended measures are acceptable and appropriate (should be secured by condition). Implementation of a bat-sensitive lighting scheme and biodiversity enhancement measures are recommended (and should also be secured by condition).

Given recent clearance of trees, in accordance with Planning Practice Guidance, DDC should “*consider whether any deliberate harm to [the] biodiversity value has taken place in the recent past, and if so whether there are grounds for this to be discounted in assessing the underlying value of the site (and so whether a proposal would achieve a genuine gain)*”. If the PEA had been undertaken prior to any site clearance, the recommended precautionary mitigation measures would still have been sufficient to safeguard against killing or injuring of protected and designated species. I am not able to say whether any offences against protected species are likely to have occurred during the vegetation clearance, but this is not directly relevant to the planning consideration anyway. NPPF seeks that “*opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity*”. Biodiversity enhancement measures in the PEA, do not go far enough to compensate for the loss of trees and vegetation that occurred prior to the survey taking place. Alternative options for replacement vegetation are required which will need to be delivered off-site; opportunities within the school grounds should be considered, incorporating native tree and shrub species planting and the use of deadwood recommended in the PEA that will provide compensatory opportunities for wildlife (including nesting birds, invertebrates and hedgehogs - to be secured by condition). Without this additional habitat creation, the development would result in a loss of biodiversity, contrary to the NPPF.

In response to further information clarifying biodiversity enhancements within the school grounds, were pleased to hear the school has already been undertaking biodiversity enhancements within the grounds, though wondered whether some of these may have been related to other development taking place around the school. Nonetheless, given the extent of tree planting and desire to improve the ecological value of the site for various species, it seems reasonable to conclude that the felling of trees at the site was not an intentional act to reduce the biodiversity value prior to seeking planning permission. With the implementation of the recommendations in the PEA secured by condition, potential ecological impacts will be adequately addressed in the determination of the application. Also suggested a condition for an undertaking to use of deadwood from the development to create wildlife shelters in school grounds adjacent to the site (details to be submitted).

Sport England –development does not fall within their statutory or non-statutory remit, so they have not provided a detailed response, but provided general advice.

Southern Water (SW) – require a formal application for connection to the public foul sewer. Building Control/ technical staff should comment on the adequacy of soakaways to dispose of surface. A sewer now deemed to be public could be crossing

the development site; should any be found during construction, an investigation will be required to ascertain ownership. Consider the provisions of the NPPF regarding the proposed location of development in relation to existing uses that may be a source of pollution (in terms of odour, applying precautionary 500m buffer zone for new development). The proposal is located approx. 304.1m from the Bulwark Sandwich Wastewater Treatment Works (WTW). Contact SW to discuss and agree the scope of the odour assessment. Due to the potential odour nuisance from Wastewater Treatment Works, no sensitive development should be located within the 1.5 OdU odour contour of the WWTW. An Odour Assessment will need to be carried out by a specialist consultant employed by the developer to a specification that will need to be agreed in advance with SW to identify and agree the 1.5 OdU contour. The service SW provide to review the assessment and/or complete a site survey is chargeable.

Environmental Protection – in relation to above odour comments from SW, would not object to application as have no evidence to support it. Have not received any recent complaints to justify a stance such as this. Justified argument under ‘agent of change’ but unclear how the developer would mitigate against it given windows are required for ventilation.

KCC Highways and Transportation - does not meet the criteria to warrant involvement from the Highway Authority in accordance with consultation protocol arrangements.

KCC County Archaeology – Recommend a condition for a programme of archaeological works.

Third party Representations:

75 members of the Public have written in objection (including from Sandwich Environment Conservation Group and CPRE, amongst other organisations) and comments are summarised below. Matters such as loss of a view, right to light and impact on house prices are not material planning considerations and have not been included.

- Residential amenity - overlooking/loss of privacy, loss of light/overshadowing (breach of 25/45 degree line, disagree with conclusions of desktop daylight and sunlight assessment submitted which is not based on survey information and contains errors, impact on physical and mental health, sustainability of neighbouring property by increasing demand for heating and carbon emissions), negative impact on existing dwellings, imposing structure, concerns regarding depth of proposed garden
- Impact on visual amenity – overbearing, concerns regarding massing, disproportionately large for size of plot, impact on landscape character. Scale, proximity and dominance is not in keeping with neighbouring properties. Design is not sympathetic to local character and landscape setting. Does not comply with NPPF Paragraph 130.
- Layout and density of building – proposed building very close to neighbouring property, concerns regarding locations of boundary treatments constructed
- Heritage - effect on listed building and character & appearance of conservation area. Heritage statement has not paid sufficient attention to this. Hedgerow and trees add to character of conservation area providing a buffer between this and school grounds and giving street a natural semi-rural setting.
- Archaeology – site near area of importance, no assessment made, impact of trench dug on site and masonry and tiles visible.
- Traffic/parking/highways safety/construction traffic parking/management – construction vehicles near to school entrance/drop off points, congestion,

vehicles would reverse onto the road opposite a lane, four way junction would be created. Concerns regarding turning space on driveway, ability to exit drive facing forward (no swept path shown) and to have appropriate visibility splays, not enough parking proposed, additional traffic and construction traffic near to busy school with parking restrictions in place

- Loss of open space and green space – no open space assessment submitted. Fence erected during course of application and digger used, piling excavation spoil and disturbing the site. School has been awarded a finding agreement by KCC to enable £2.1m (plus indexation) of developer contributions (for the earlier expansion of the school) and has released other property for sale generating £2.5m, removing the financial requirement to develop the site to fund an astro turf pitch. Marketed value of other assets alluded to in letter from Sir Roger Manwood's School greatly exceeds cost of the astro turf and appear to be adequate without the additional need for the sale of this land, funds could be raised elsewhere. Objection to and lack of need for astro turf pitch (and concerns it could in future become additional housing and precedent could be set and could have long term health impacts). Need to secure money for extra sporting facilities is irrelevant and should not form part of planning consideration. No evidence criteria of NPPF Paragraph 99 have been met. Contrary to Policy DM25 and draft Policy PM5.
- Ecology & biodiversity – loss of diverse habitat. Habitat and species of principle importance under Sections 40 & 41 of Natural Environment and Rural Communities Act. No environment assessment study undertaken – survey undertaken after disturbance of land and serves as scoping survey with further surveys required, no bat report on felled trees. Plot was unmanaged, left wild resulting in abundance of wildlife. Deliberate attempt to downgrade overall biodiversity of the site. Negative impact on biodiversity, bats, newts, grass snakes, reptiles etc. No mitigation to offset loss, off-site enhancement required. Does not follow framework to find appropriate development sites away from areas of biodiversity and flood risk. 10% biodiversity net gain requirement. School previously had small nature reserve bordering the site managed by their Eco Society. Site is characterised as mixed woodland in Kent Habitat Survey. Concern for environment, sustainability, climate change. Site forms part of green infrastructure network (policy CP7) Green Infrastructure Strategy 2014, states the built area of Sandwich is marked as 'potential to enhance quality of green infrastructure' (site is in the town boundary). Area is near a site of special scientific interest (SSSI) and nature reserves. Concerns regarding impact on Sandwich SPA and Ramsar site. Light pollution, climate change.
- Flood risk & surface water flooding – significant risk on St George's Road, neighbouring properties and public highway would be impacted by surface water flooding. Hard surfaces will potentially reduce water absorption and increase water run off into already challenged drainage system. Area is at risk of surface water flooding (planning maps and CC5)
- Trees/hedgerow - loss of trees & important hedgerow & impact on neighbouring TPO tree root systems (some trees removed from site c. 18 months ago), loss of woodland (which provides valuable carbon storage within mature trees) (possible ancient woodland) and deliberate removal of trees, unclear how many trees will be removed, no mitigation proposed. Concerns regarding accuracy of pre-development tree report, assigns trees as category C but they should have a higher retention value. Most of local area within conservation order with protection orders on the trees. Concerns there would be pressure to remove trees to rear of site. Site forms part of green space corridor. Mature trees are important for carbon sequestration, help keep temperatures moderate, reduce flood risk, limit air pollution.

- Errors in application form & lack of surveys/reports/information (e.g. ecological, trees, traffic/transport, plot size) – application does not show the area as it is now. Images which include No. 95 have been created at an angle to minimise impact. No environmental impact statement or protected species survey submitted. No daylight and sunlight assessment, flood risk assessment. No dimensions on plans. Heritage statement is inaccurate, land has been used for educational purposes and school cadet force use this corner for training exercises. Properties from 95 St George’s Road to the Sandown Road junction were previously school tennis courts. Concerns that supporting comments have been submitted past the closing date and amendments submitted. Consultee responses not published. Ecological and arboricultural surveys were undertaken after the site had been damaged. Policy CP5 requires development to meet at least Code level 5 (code for sustainable homes/BREEAM Pre-assessment statements not submitted and proposal is contrary to this policy). Policy CC1 relates to reducing carbon emissions and an energy assessment could be submitted. Excavation and other works carried out and associated impacts, subject to enforcement. Independent planning advice obtained by school notes possible difficulties in obtaining planning permission.
- Affected by policies DM16, draft policies PM5, CC4, CC5, CC6, CC7, CC8, PM1, PM2, PM5, HE1, HE2, HE3, SP1, SP4 (h), SP13, SP14, NE1, NE2, nitrate neutrality area, Kent Biodiversity Strategy 2020, Conservation of habitats and Species Regulations 2017 (as amended), Wildlife and Countryside Act 1981 (as amended), Countryside and Rights of Way Act 2000, The Environment Act 2021, Kent Biodiversity Strategy 2020-2045, The Environmental Targets (Woodland and Trees Outside Woodland) (England) Regulations 2023, Environmental Protection Act 2021, Environmental Protection Act 2021, The Green Infrastructure Strategy 2014, Government’s 25 year environment plan, Public Health England report on Better Access to Quality Green Space. Contrary to policy in several areas (not land allocated for housing, cannot be treated as an acceptable windfall development site)
- Development primarily for financial gain to school in order to obtain funds for another project where there is still an acknowledged financial shortfall. Gives negative example to pupils.
- Other more viable sites available which would yield more than one dwelling to boost housing delivery deficit (listed in local plan). Should be on brownfield land. Concerns that if approved, it would open the whole field boundary for development. Safeguarding risk with a property inside school grounds. Need for affordable homes rather than detached dwellings.
- Need – unsold new homes available on Pebblegate, Montagu Place and Willow Bank estates with further 300+ unbuilt homes already approved
- Overloaded infrastructure in Sandwich
- Impacts outweigh benefits of development
- Generally support the schools development but object to it doing so at expense of habitat loss, environmental impact and impact on neighbouring properties.

16 representations in support of the proposals have been received and are summarised below:

- No impact on operation of school
- Good use of plot of land (poorly managed), sensible use of land which school no longer uses, does not appear to compromise public services
- Near to transport – good access and walking distance from town centre
- Will facilitate development of new astroturf sports pitch for school and wider community. Provide additional facilities for school, potentially allowing for

expansion of programmes or inclusion of new amenities – could have positive impact on education and overall experience of students. Will release funds that can be invested into the development, maintenance and modernisation of parts of the school.

- Economic benefits to town and local community – construction jobs and new building could attract business. Beneficial to school and pupils
- Design – has been designed to have positive impact on environment & local ecosystem & minimise impact on surrounding natural landscape. Will preserve and enhance conservation area for future generations, would sit sympathetically into its surroundings. In keeping with local area, will integrate with neighbouring properties and improve character of properties. Does not detract from conservation area. Fail to see how one more property being built next to relatively new houses can be so harmful – surely the same argument was raised when these were originally built. Land adjacent to this area, previously owner by the school, was also sold in the past for houses. Low environmental impact, takes into account local environmental factors in line with planning policy.
- Volume of environmental objections posted highlights concerns that can be managed by way of supplementary environmental initiatives, school already appear to exercise their responsibilities in a manner fitting a diligent custodian of land.

A letter from Sir Roger Manwood's School (the applicants) has been submitted:

- Sir Roger Manwood's School are committed to ensuring the continued improvement of our school. Primary amongst that is the provision of a broad and balanced curriculum to our students which emphasises the importance of healthy living. Our collective vision is also that our local community makes more use than is currently the case of the facilities that the School has to offer.
- To this end we are making a major investment to improve the sports facilities on our site - the installation of a brand new, full size, astroturf pitch on the Peto Field off St George's Road. Planning permission was granted by DDC in April 2022 (Application Number 21/01314). Not only will this provide an all-weather facility for our students but also one which will be available for use by the local community outside of school hours. This will continue to allow us to meet and develop the needs of our curriculum but also help meet the needs of the Local Plan for additional sporting facilities within the Dover District.
- The cost of the development will be £1,002,051.69. The School is funding it through the sale of an ex-boarding asset which is no longer needed now that boarding has closed at SRMS - the residential caretaker's house. The proceeds from the sale of unused land on St Georges Road, hopefully with planning permission for a 4-bedroom house on that land (Application Number DOV/22/01341), will also go towards this initiative.
- We hope you view this application favourably as it will allow us to make a serious improvement to the facilities available to future generations of students and local residents, as well as enhancing the learning and sporting opportunities for current students and residents.

f) **1. The Site and the Proposal**

- 1.1 The site relates to a plot of land on the northwest side of St George's Road, Sandwich. The site is designated as open space and is within the southeastern corner of the grounds of Sir Roger Manwoods School. To the northwest is a sports pitch and to the northeast is 95 St George's Road. Immediately to the northeast of the site is the Sandwich Walled Town Conservation Area (which is subject to an Article 4 Direction) and there are a number of trees within this area

which are subject to a Tree Protection Order (TPO). Since the submission of the application, a TPO has also been placed on trees within the application site (TPO/23/00015, confirmed in December 2023).



- 1.2 The applicant seeks permission for the erection of a detached dwelling, with a new vehicular access from St George's Road, associated parking and landscaping. The dwelling would be finished in red stock facing bricks at ground floor level with white render at first floor level, white uPVC windows and conservation style velux rooflights and would have a hipped main roof, with lower ridged projecting gable roofs finished in plain clay tiles (shown in Figure 2). The dwelling would contain four bedrooms, as shown in Figure 3. The design and siting was amended during the course of the application and was re-advertised and subject to further consultation.



Figure 2. Proposed Elevations

2. Main Issues

2.1 The main issues for consideration are:

- The principle of the development
- Impact on the character and appearance of the area
- Impact on heritage assets
- Impact on residential amenity
- Other matters including flooding, archaeology, Habitats.

Assessment

Principle of Development

2.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

2.3 Policy DM1 states that development will not be permitted outside of the settlement boundaries, unless it is justified by another development plan policy, functionally requires a rural location or is ancillary to existing development or uses. The site lies within the settlement confines, such that the principle of residential development in this sustainable location is considered to accord with policy DM1.

2.4 The site is also identified as open space and subject to Policy DM25. This sets out that proposals that “would result in the loss of open space will not be permitted unless:

- I. there is no identified qualitative or quantitative deficiency in public open space in terms of outdoor sports sites, children's play space or informal open space; or

- ii. where there is such a deficiency the site is incapable of contributing to making it good; or
- iii. where there is such a deficiency the site is capable of contributing to making it good, a replacement area with at least the same qualities and equivalent community benefit, including ease of access, can be made available; or
- iv. in the case of a school site the development is for educational purposes; or
- v. in the case of small-scale development it is ancillary to the enjoyment of the open space; and
- vi. in all cases except point 2, the site has no overriding visual amenity interest, environmental role, cultural importance or nature conservation value”.

The heritage and planning statement submitted considers that although the land is protected by policy, it is not public open space and is not used as part of the schools playing field or for any other associated purpose. It considers that whilst development of the site may not directly be for educational purposes (noting point iv of the policy), it will directly fund the approved all-weather astro turf sports pitch at the school (although this is disputed in the public representations received). Whilst noting this, it is not considered that the proposals have demonstrated they would accord with the exceptions of points i - vi.

- 2.5 Policy CP7 seeks to protect and enhance the existing network of green infrastructure. Development that would harm the network will only be granted if it can incorporate measures to avoid the harm arising or sufficiently mitigate its effects. Proposals that would introduce additional pressure on the existing and proposed Green Infrastructure Network will only be permitted if they incorporate quantitative and qualitative measures, as appropriate, sufficient to address that pressure. Discussed further at paragraph 2.28 onwards, a number of biodiversity enhancement measures are suggested on and off-site, recommended to be secured by condition or obligation such that the mitigation proposals are considered to accord with the policy.
- 2.6 The NPPF advises at paragraph 11, that proposals that accord with an up-to-date development plan should be approved without delay. Where there are no relevant development plan policies or the policies which are most important for determining the application are out of date, permission should be granted unless the application of policies in the framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (policies include those relating to habitats sites, SSSI, AONB, Heritage Coast, irreplaceable habitats, designated heritage assets and those of archaeological interest and areas at risk of flooding or coastal change), or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole. An assessment of the most important policies for the determination of the application must be undertaken to establish whether the ‘basket’ of these policies is, as a matter of judgement, out-of-date. Additionally, criteria for assessing whether the development plan is out-of-date are explained at footnote 8 of the NPPF. This definition includes: where the council are unable to demonstrate a five-year housing land supply (or a four year supply if applicable); or, where the council has delivered less than 75% of the housing requirement over the previous three years (the Housing Delivery Test).
- 2.7 Having regard for the most recent Housing Delivery Test, and in accordance with the updated NPPF at paragraphs 77 and 226 the Council can demonstrate a four year housing land supply. It is, however, necessary to consider whether the ‘most important policies for determining the application’ are out of date.

- 2.8 Policy DM1 and the settlement confines referred to within the policy were devised with the purpose of delivering 505 dwellings per annum in conjunction with other policies for the supply of housing in the Council's 2010 Adopted Core Strategy. In accordance with the Government's standardised methodology for calculating the need for housing, the council must now deliver a greater number of dwellings per annum. As a matter of judgement, it is considered that policy DM1 is in tension with the NPPF, is out-of-date and, as a result of this, should carry only limited weight.
- 2.9 Policy DM25 seeks to protect existing open space, subject to a number of criteria. NPPF Paragraph 103 sets out that "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use". The Policy broadly accords with these objectives and is considered to attract moderate weight in the planning balance.
- 2.10 Policy CP7 seeks to protect the existing green infrastructure network. NPPF Paragraph 96 sets out that decisions should enable and support healthy lifestyles through the provision of safe and accessible green infrastructure, sports facilities etc. NPPF Paragraph 181 seeks for plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. The policy is considered to broadly align with the objectives of the NPPF and is considered to attract moderate weight in the planning balance.
- 2.11 The Draft Local Plan was submitted for examination in March 2023 and its policies are considered to be material to the determination of applications, with the weight attributed to the policies dependant on their compliance with the NPPF. Draft Policy SP1 of the Submission Draft Dover District Local Plan seeks to ensure development mitigates climate change by reducing the need to travel and Draft Policy SP2 seeks to ensure new development is well served by facilities and services and create opportunities for active travel. Draft Policy TI1 requires opportunities for sustainable transport modes to be maximised and that development is readily accessible by sustainable transport modes. Draft Local Plan Policy SP4 sets out the appropriate locations for new windfall residential development. The draft Policy seeks to deliver a sustainable pattern of development including within the rural areas where opportunities for growth at villages (in line with Paragraph 83 of the NPPF) are confirmed. The policy is underpinned by an up-to-date evidence base of services and amenities at existing settlements and takes account of the housing need across the district, such that it is considered to attract moderate weight in the planning balance. The site is located within the draft settlement confines and would therefore accord with the objectives of the policy.
- 2.12 Draft Policy PM5 relates to the protection of open space, sports facilities and local green space. It states: "Development proposals that involve the whole or partial loss of open space within settlements, including outdoor recreation facilities, playing fields or allotments within or relating to settlements, or of built and indoor sports facilities, will not be supported unless either:
a. A robust assessment of open space and sports provision, using the quantity and access standards for open space and sports facilities set out in this Local

Plan, has identified a surplus in the catchment area to meet both current and future needs, and full consideration has been given to all functions that open space and indoor built sports facilities can perform, having regard to the existing deficiencies within the local area; or

b. Any replacement facility (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality, availability and accessibility of open space or sport and recreational opportunities.

In all circumstances, the loss of open space will not be permitted if that open space:

1. Contributes to the distinctive form, character and setting of a settlement;
2. Creates focal points within the built-up area; or
3. Provides the setting for important buildings or scheduled monuments, or are themselves of historic or cultural value.

The sites identified on the Policies Map as Local Green Space, including those identified within adopted Neighbourhood Plans, will be protected from development in accordance with the requirements of the National Planning Policy Framework”.

2.13 The planning statement sets out that permission has been granted for the development of an astro pitch facility at the school's Farrier Field on the south side of St Georges Road, which is under construction. The proposals would, in part, fund the provision of the astro pitch (albeit this is disputed in some of the third-party representations received which consider the project has been otherwise funded). The application has been subject to consultation with the Planning Policy Team who advise that the proposals appear to accord with part b) of the draft policy, in that the enhancement of the remainder of the existing site provides a net benefit to the community in terms of sport and recreation opportunities. It is not considered the site creates a focal point within the built up area, provides the setting for important buildings or scheduled monuments or is itself of historic or cultural value. The loss of the proposed area of open space, which forms part of the larger open space of the school grounds, is not considered to contribute to the distinctive form, character and setting of the settlement as the proposals are considered to appear as a continuation of the existing residential development along St George's Road, discussed further in this report. As such, it is considered the proposals would accord with the exceptions of draft Policy PM5. The draft policy is considered to attract moderate weight in the planning balance, being devised in line with the NPPF and an up-to-date evidence base.

2.14 Draft Policy SP14 seeks to conserve and enhance the green infrastructure and biodiversity of the District. It states that every development (excluding householder) will be required to connect to and improve the wider ecological networks in which it is located, providing on-site green infrastructure that connects to off-site networks. Proposals must safeguard features of nature conservation interest, and retain, conserve and enhance habitats, including internationally, nationally and locally designated sites, irreplaceable and priority habitats, networks of ecological interest, ancient woodland, chalk grasslands, water features, hedgerows, beaches, wetland pastures and foreshores, as green and blue corridors and stepping-stones for wildlife. Development should ensure that the integrity of the existing network of green infrastructure, including the hierarchy of designated sites, the Local Nature Recovery Network and Biodiversity Opportunity Areas across the District is strengthened as part of proposals, in order to increase the contribution to health and wellbeing, carbon sequestration and resilience to climate change delivered by such green

infrastructure. All development must avoid a net loss of biodiversity and will be required to achieve a net gain in biodiversity above the ecological baseline in line with Policy NE1. The draft Policy is considered to attract moderate weight in the planning balance, with the objectives of biodiversity enhancement being in line with those of the NPPF, albeit the need for achieving a net gain in biodiversity is not yet required for development of this scale. A number of biodiversity enhancement measures are suggested on and off-site, recommended to be secured by condition and discussed further at paragraph 2.28 onwards, which are considered to mitigate and compensate for the loss of biodiversity and contribute to the maintenance of the green infrastructure network, in accordance with the objectives of the draft policy.

- 2.15 It is considered that policy DM1 is in tension with the NPPF, although for the reasons given above some weight can still be applied to specific issues the policy seeks to address, having regard to the particular circumstances of the application and the degree of compliance with NPPF objectives, in this context. The proposals would also accord with the objectives of Draft Policy SP4 which is considered to attract moderate weight in the planning balance, being devised on the basis of current housing targets and the NPPF. It is considered the proposals would be contrary to Policy DM25, which is considered to attract moderate weight in the planning balance. The proposals, by assisting in funding an astro turf pitch elsewhere in the school grounds, are considered to accord with part b of draft Policy PM5, which is considered to attract moderate weight in the planning balance. Notwithstanding this, Policy DM1 is particularly critical in determining whether the principle of the development is acceptable and is considered to be out-of-date, and as such, the tilted balance approach of Paragraph 11 of the NPPF is engaged. An assessment as to whether the adverse impacts of the development would significantly and demonstrably outweigh the benefits (and whether this represents a material consideration which indicates that permission should be granted) will be made at the end of this report.

Impact on Character and Appearance of the Area

- 2.16 The site is within a predominantly residential area, comprising detached and semi-detached or link-detached dwellings of varying heights (between a single storey and 2 ½ storeys), finished in a range of materials which include white render, brick and clay tiled roofs.

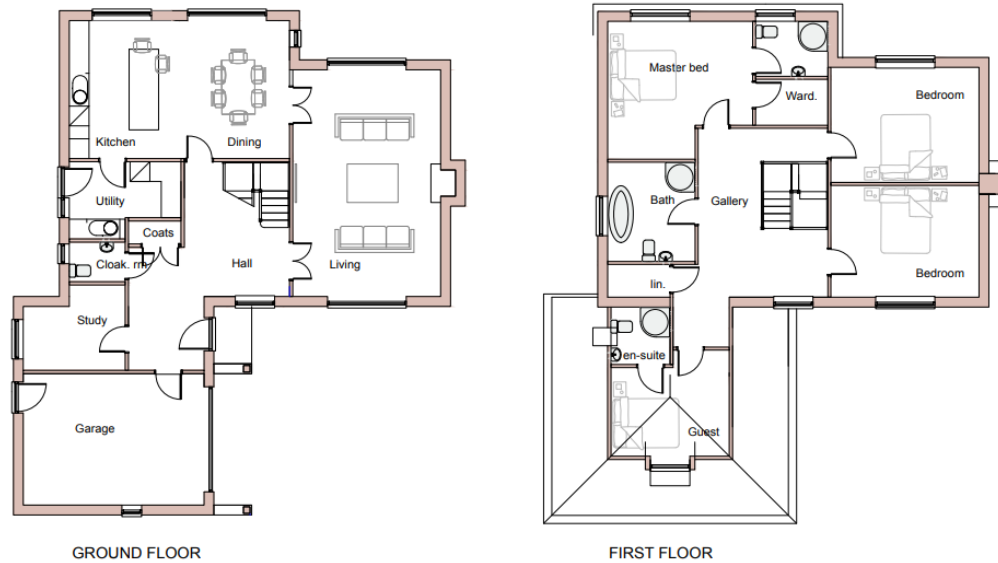


Figure 3. Proposed Floor Plans

2.17 The proposed dwelling, as shown in Figures 2 and 3, would be finished in brick at ground floor level, with render at first floor level and would have elements of timber beam detailing, which feature in the street scene. The dwelling would have a large tiled hipped roof, with front and rear projections with lower ridge heights, appearing as subservient additions. Whilst the proportions of the dwelling differ from the row of link-detached dwellings to the northeast, which have catslide roofs and hipped roofs to the garages, it is considered that the proposal, being at the end of this section and being detached, would be seen as a continuation of the existing residential development to the west and would be in keeping with the material palette of the area. Having had regard to NPPF Paragraph 135 and draft Policy PM1, it is considered the proposals would respond positively to the existing built form and context of the area, being of a compatible scale and design and preserving the character and appearance of the street scene.

Impact on Heritage Assets

2.18 The site lies immediately to the southwest of the Sandwich Walled Town Conservation Area and a heritage statement has been submitted accordingly. Chapter 16 of the NPPF and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out requirements relating to the assessment of the impact on Conservation Areas. In particular, special attention must be paid to the desirability of preserving or enhancing the character or appearance of the conservation area. Paragraph 205 of the NPPF sets out that great weight should be given to the conservation of heritage assets, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. In addition, draft Local Plan Policies SP15, HE1, HE2 and HE3 are relevant material considerations.

2.19 The Heritage Team have reviewed the proposals, advising that they do not consider the application requires specialist input in respect of the built historic environment and to ensure the proposals are considered with reference to the relevant paragraphs of the NPPF. As considered in the character and appearance section above, the design, scale and materials of the proposed

dwelling are considered to be compatible with those of the street scene and for this reason, the development is considered to preserve the setting of the adjacent conservation area, resulting in no harm to its significance, having had regard to Chapter 16 of the NPPF, the objectives of draft Policies SP15, HE1, HE2 and HE3 and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Impact on Residential Amenity

- 2.20 The proposals would be visible from a number of nearby dwellings, with 95 St George's Road, located directly to the northeast of the site, being the closest in proximity. This neighbouring property features a window on the flank (west) elevation at ground floor level facing the application site, which is secondary to glazed doors on the rear elevation serving a main habitable room. A daylight and sunlight assessment has been submitted, based on BRE Guidance, although representations dispute the conclusions made based on the lack of survey data and inaccuracies, particularly in relation to the size of the window on the flank elevation of the property. The vertical sky component (VSC) test is the ratio of the direct sky illuminance falling on a vertical window at the central reference point (or 1.6m above ground level on a floor to ceiling window), to the simultaneous horizontal illuminance under an unobstructed sky. This identifies the proposals would result in a reduction of 66% (0.34) on the window on the flank elevation of the neighbouring dwelling. A mirror exercise has been carried out which produces a revised target of 1.04, although this approach is more generally used in built up areas. As set out above, a number of windows serve the same room and results have been provided of the mean VSC of 0.85. The daylight distribution (no sky line) test (which establishes where, under the existing and proposed scenario, the sky can and cannot be seen at points within a room) has been carried out for the neighbouring room, indicating the proposals would result in a 0.1% reduction in the area of the room that would be lit as a result of the proposed development. The guidelines would consider a reduction of up to 20% would be acceptable. The annual probable sunlight hours (APSH) test has also been carried out, which looks at the annual and winter sunlight hours which would be received by each window, for the existing and proposed scenario. To be considered acceptable, the annual probable sunlight hours should remain above 25% and the winter probable sunlight hours should remain above 5%. Where the results of the test do not meet this, a reduction of 20% between the existing and proposed scenario is generally considered acceptable. The results set out that with the exception of the window on the flank elevation, all windows would have less than a 20% reduction compared to the existing scenario (in some cases there would be no reduction). With regard to the window on the flank elevation, whilst the level of reduction in sunlit hours would be greater than 20% (compared to the existing scenario), for the annual probable sunlight hours, it would be 25% and for the winter probable sunlight hours it would be above 5%, so would pass. As stated above, the accuracy of the results, based on the window size assumed for the flank elevation window is disputed in the representations. It is considered the proposals would result in some overshadowing and reduction in diffuse daylight to the neighbouring property, however on balance, it is not considered that this identified harm would be so significant to warrant a reason for refusal.
- 2.21 The proposed dwelling would be directly visible, albeit at an oblique angle, from the garden of the neighbouring property (95) and would be positioned approximately 2.6m from the window on the flank elevation (secondary to larger

openings on the rear elevation serving the same room and providing the primary outlook across the garden of the property). Whilst the proposals would result in a substantial change from the existing scenario, on balance, due to the positioning and design of the dwelling, the development is not considered to result in such an overbearing impact on neighbouring residential amenity to warrant a reason for refusal.

- 2.22 The proposed dwelling would have windows on the rear elevation which would primarily overlook the garden of the application site and woodland of the school beyond. Whilst there may be some oblique angled views across the rear garden of the neighbouring property from the first floor bedroom windows, there would be no direct views of this property's most private rear garden external amenity space such that there would be any significant harm due to a loss of privacy. There would be no windows on the flank (east) elevation of the main dwellinghouse (albeit there would be a secondary window serving the kitchen/dining room at ground floor level set further from the neighbouring property).
- 2.23 Concerns in respect of the impact on the amenities of other nearby residents have been raised in the public representations received. Due to the orientation of the site and direction of the sun path, the proposed dwelling would not result in overshadowing or loss of light to properties to the south (on the opposite side of St George's Road). In respect of privacy, whilst the proposed dwelling would have windows on the front elevation, these would primarily overlook the site itself and the public highway beyond. There would be a separation distance of approximately 26m between the proposed dwelling and 148 St Georges Road and 23m between the proposed dwelling and 140 St Georges Road. Consequently, it is considered there is a very comfortable distance such that there would be no harm to neighbouring privacy or overlooking. For the same reasons, and due to the design and appearance of the proposed dwelling, the development would have no undue impact on the amenity of other nearby residents and is considered to be acceptable, having had regard to NPPF Paragraph 135 and Draft Policy PM1 and PM2.
- 2.24 In respect of the amenities of the proposed occupiers of the development, the dwelling would contain four bedrooms, bathrooms, study, utility, living room and open plan kitchen/dining room. All habitable rooms would be naturally lit and ventilated, and a private garden would be provided to the rear (north) of the dwelling. It is considered the proposals would accord with the objectives of draft Policy PM2 and NPPF Paragraph 135.
- 2.25 In respect of parking and highways, the proposed dwelling would contain an integral garage and would have a driveway, with access from St George's Road. Whilst concerns have been raised in representations, in accordance with the requirements of Policy DM13 and Draft Policy TI3, it is considered that there would be sufficient space within the site for two vehicles to park and bicycles could be stored within the integral garage or securely within the garden of the site. It is noted that concerns have been raised in public representations in relation to highways safety, however no concerns have been raised by KCC Highways (and the proposals are not in accordance with their consultation protocol).

Other Matters Including Ecology and Trees

- 2.26 The site contains a number of trees, although it is noted that several were cut down prior to the submission of the application, and vegetation has been cut since. A Tree Preservation Order (TPO/23/00015) has been confirmed relating to a yew, a sycamore and a group of 8 sycamore at the site. A pre-development tree report (March 2023) was submitted, identifying a number of category C trees within and to the southwest of the site. G1 (a group of 7 sycamores), G5 (mixed hedgerow along the southern site boundary), T2 (a sycamore) and T3 (a yew) would be removed to enable the development (G1, T2 and T3 being the subject of TPO/23/00015). G4 (three Norway maple trees) to the southwest of the site would be retained and the proposed development would not encroach on their root protection areas.
- 2.27 The Tree and Horticulture Officer has reviewed the proposals and considers that the proposed removal of the remaining trees, as well as hedgerow to the front of the site is disappointing, however requests a robust replanting scheme of native species, together with the planting of a new native hedge along the front boundary, if permission is granted. It is thought that the trees on the land to the rear (TPO/23/00010), and those adjacent to the south western boundary could be subject to post-development pressure (due to such nuisances as shading of the rear garden of the proposed new dwelling, the dropping of leaf litter etc), and whilst this has been addressed in the arboricultural impact assessment section of the tree report, it concluded that such nuisances are not likely to pose a significant issue. Subject to the imposition of a landscaping condition, the proposals are considered to be acceptable in this regard.
- 2.28 As noted above, the site is vegetated and during the course of the application and following initial comments from the Senior Natural Environment Officer, a preliminary ecological appraisal (PEA) was submitted. The appraisal identifies that the development site contained part of an existing woodland that has not been previously designated as priority habitat and contains a small pond. The woody vegetation offers potential for nesting birds, however, the remaining trees appear to offer negligible potential for roosting bats (although bats are likely to forage and/or commute over the application site). Vegetation is characterised by bare ground and regenerating scrub that creates shade making the site suboptimal for reptiles. Noting the presence of a small pond at the site, this was considered to offer poor potential for great crested newt although available vegetation offers potential sheltering habitat to other widespread amphibian species that could breed in nearby residential gardens. No setts or evidence of badgers within the site were identified and the habitat is considered unsuitable for beaver, otter and water vole, with the site also being outside of the known range of dormouse and available habitat being limited in extent and isolated from other suitable dormouse habitat. Available habitat within the site is considered to offer opportunities for invertebrates, particularly species associated with dead wood and hedgehog could shelter and/or forage within the local area. Biodiversity enhancement features such as bird nesting boxes, bat boxes, hedgehog gates and native hedgerow are recommended.
- 2.29 It is noted that a number of the representations submitted advise a number of species, including some protected species, are present at the site, as well as commenting on the findings of the PEA and survey carried out, noting clearance works that have taken place at the site. The Senior Natural Environment Officer has reviewed the proposals, advising that with the implementation of the recommendations in the PEA being secured by condition, the potential ecological impacts will be adequately addressed in the determination of the application. They recommend conditions are imposed for a biodiversity method statement

(for the protection of biodiversity including but not necessarily limited to badgers, hedgehogs, nesting birds and reptiles during site, vegetation clearance and construction works, to be informed by up to date ecological surveys); a bat sensitive lighting scheme; a scheme of biodiversity enhancements (e.g. swift nest boxes, songbird nest box, integrated bat bricks / bat tiles, hedgehog gaps (13cm x 13cm) in any close board fencing, native species hedgerow planting) and an undertaking to use deadwood from the development site to create wildlife shelters in school grounds adjacent to the site (within the blue line boundary). These on and offsite works are considered to mitigate and compensate for the harm to green infrastructure, with the provision of replacement planting (which would also be secured through a condition for a landscaping scheme).

- 2.30 Subject to these conditions being imposed, the development is considered acceptable in respect of ecology and the green infrastructure network, having had regard to the objectives of the NPPF, to Policy CP7 and draft Policies SP13, SP14 and CC8. In respect of draft Policy NE1 which seeks a 10% biodiversity net gain, this is not a national requirement for sites of this scale such that the policy is considered to attract limited weight in relation to the proposals.

Flood Risk and Drainage

- 2.31 The site is located within flood zone 1, which has the lowest risk from flooding from rivers and the sea. For new residential development of this scale and within this flood zone, a flood risk assessment, sequential test and exceptions test are not required. Concerns are raised in public representations in respect of surface water flooding and the application form sets out that surface water would be disposed to a soakaway.
- 2.32 Foul sewage would be disposed to the mains sewer and Southern Water have advised that a formal application for a connection to the public sewer will need to be made if permission is granted. As these matters are dealt with under building regulations, it is not considered necessary to suggest conditions are imposed for the submission of further information.
- 2.33 Southern Water advised that they apply a precautionary buffer zone for any development located within 500m of the boundary of the wastewater treatment works (WWTW). The proposed development is located approximately 304.1m from the Bulwark Sandwich WWTW and due to the potential odour nuisance from Wastewater Treatment Works, they advise that no sensitive development should be located within the 1.5 OdU odour contour of the WWTW. They advise that an odour assessment should be carried out by a specialist consultant employed by the developer to a specification agreed with Southern Water to identify and agree the 1.5 OdU contour and that Southern Water provide a chargeable service to review the assessment and/or complete a site survey. However, Environmental Protection Officers have reviewed this comment and advise that it is not a concern they would have as it is not something they have been made aware of and they have also not received any complaints to justify a stance such as this. They note that the Bulwark wastewater treatment plan is some 300m from the proposed development and there are many houses far closer that would be affected should there be a prolific odour problem in that area of Sandwich. They are also not aware of any new development within this location that would have raised the issue before and the Environmental Protection Team do not have evidence to support an objection.

Archaeology

- 2.34 The site is within an area of archaeological potential surrounding Early Medieval/ Medieval town. Having had regard to NPPF Paragraph 200 and draft Policies HE1 and HE3, no desk-based archaeological assessment has been submitted. KCC Archaeology has been consulted on the proposals, advising that the site lies outside of the town walls on the southern edge of the historic medieval town of Sandwich. A castle is first recorded at Sandwich in the fourteenth century and this lay outside the town walls on the south-east side of the town. Remains belonging to the castle have been recorded some 175-200m to the north-west of the application site within the grounds of Sir Roger Manwood's School. Flintwork of Mesolithic or Neolithic date and pottery of Romano-British and medieval date have also been recorded at the school but not recovered from archaeological features. Nevertheless, these finds indicate the potential for multi-period occupation in the area south-east of the walled town. This is supported by the similar discovery of finds of Roman, Anglo-Saxon and medieval at Manwood Grange to the north-east of the proposed application site, whilst in fields to the south-east (outside the built-up area) quantities of Iron Age coins and other material indicative of a settlement site have been noted.
- 2.35 KCC Archaeology recommend a condition is imposed to secure the implementation of a programme of archaeological work in accordance with a written specification and timetable (to be submitted to and approved in writing by the Local Planning Authority) if permission is granted. Subject to this and having had regard to the NPPF and draft Policy HE3, it is considered the development would be acceptable in this respect.

Habitats Regulations (2017) Regulation 63: Appropriate Assessment

- 2.36 The impacts of the development have been considered and assessed. There is also a need to consider the likely significant effects on European Sites and the potential disturbance of birds due to increased recreational activity at Sandwich Bay and Pegwell Bay. Accordingly, it is noted the site is located within the Thanet Coast and Sandwich Bay SPA Zone Of Influence set out in draft Policy NE3.
- 2.37 Detailed surveys at Sandwich Bay and Pegwell Bay have been carried out and the identified pathway for such a likely significant effect is an increase in recreational activity which causes disturbance, predominantly by dog-walking, of the species which led to the designation of the sites and the integrity of the sites themselves. A Strategic Access Mitigation and Monitoring Strategy (SAMM) has therefore been adopted by DDC in order to monitor potential impacts on qualifying bird species of the SPA arising from development in the District and to provide appropriate mitigation of the cumulative impact of additional housing development through a range of management and engagement methods. These methods and monitoring of their effectiveness are to be funded by financial contributions from new residential development coming forward within the 9km Zone Of Influence as set out in draft Policy NE3. Accordingly the agent has agreed that the required contribution would be secured via a legal agreement if permission is granted.
- 2.38 Subject to this contribution being secured by a legal agreement, the mitigation measures will ensure that the harmful effects on the designated site, caused by recreational activities from existing and new residents, will be effectively

managed in line with the objectives of draft Policy NE3.

Planning Balance

- 2.39 The proposals would contribute one dwelling towards the Council's 4-year housing land supply. The application site is located within the settlement confines identified in Policy DM1 and the principle of residential development in this sustainable location is considered acceptable. The site is also within the Draft settlement confines associated with draft Policy SP4, attracting moderate weight in favour of the proposal.
- 2.40 Notwithstanding that the site is not public open space and is not used as part of the schools playing field or any associated purpose, the proposals do not appear to accord with Policy DM25, which is considered to attract moderate weight against the development. However, the proposals would, in part, fund the provision of an astro pitch elsewhere within the school grounds. It is considered the enhancement of the remainder of the existing site provides a net benefit to the community in terms of sport and recreation opportunities, in accordance with part b and points 1, 2 and 3 of draft Policy PM5, attracting moderate weight in favour of the development. The site forms part of the green infrastructure network and it is considered the biodiversity enhancement measures (to be secured by conditions) would sufficiently mitigate the effects of the development, in accordance with Policy CP7 and draft Policy SP14, which is considered to attract moderate weight in favour of the proposals.
- 2.41 The impact on visual amenity and the character and appearance of the adjacent conservation area has been assessed and, subject to the imposition of conditions, is considered to accord with the objectives of the NPPF (particularly paragraphs 135 and 200-213), draft Policies PM1, HE1 and HE2 and Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, with the development resulting in no harm to the significance of the heritage assets. The impact on residential amenity has been considered and whilst the proposals would result in some loss of daylight and sunlight, particularly to one neighbouring window, on balance, this would not result in such a significant overshadowing/loss of light or overbearing impact to warrant refusal and would have an acceptable impact on privacy. The impact on the amenities of other nearby residents, as well as future occupiers of the development, is considered acceptable having had regard to NPPF paragraph 135 and draft Policies PM1 and PM2, weighing in favour of the development.
- 2.42 The impact on other material considerations, including archaeology, flood risk and drainage, highways, trees and ecology, has been considered and is acceptable subject to the imposition of the suggested conditions.
- 2.43 Overall, having had regard to the objectives of NPPF Paragraph 11, it is considered that the disbenefits of the scheme do not outweigh the benefits, with material considerations indicating that permission should be granted.

3. Conclusion

- 3.1 For the reasons set out above and having had regard to the tilted balance engaged under NPPF Paragraph 11, the proposed erection of a detached dwelling with a new vehicular access and associated parking and landscaping is considered acceptable in principle and in respect of other material

considerations, with the benefits of the development outweighing the disbenefits and it is recommended that permission be granted.

g) Recommendation

- I PERMISSION BE granted subject to the completion of a UU to secure financial payments towards mitigating the impact of the development on the Thanet Coast & Sandwich Bay SPA and the following conditions:
- 1) Time
 - 2) Plans
 - 3) Samples
 - 4) Programme of archaeological work
 - 5) Landscaping scheme (to include native species)
 - 6) Biodiversity method statement for the protection of biodiversity
 - 7) Biodiversity enhancements
 - 8) Bat sensitive lighting strategy
 - 9) Use of deadwood from the site to create wildlife shelters in school grounds adjacent to the site
 - 10) Provision of access and parking prior to first occupation
- II Powers to be delegated to the Head of Planning and Development to settle any necessary planning conditions, obligations and reasons in line with the issues set out in the recommendation and as resolved by the Planning Committee.

Case Officer

Rachel Morgan