

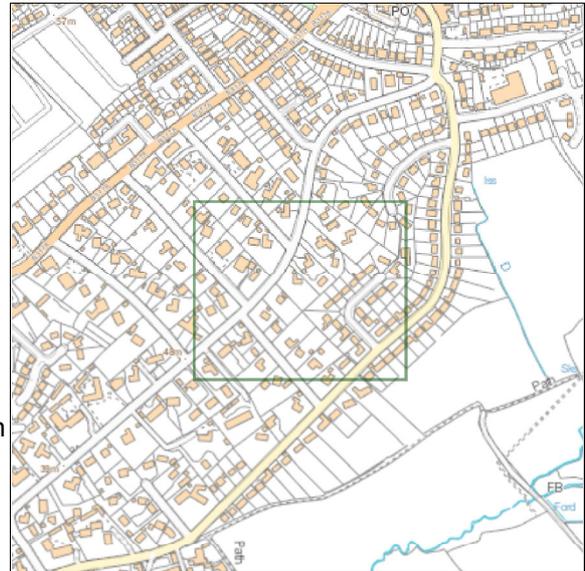
**Ward** Exmouth Littleham

**Reference** 19/1258/MFUL

**Applicant** Mr & Mrs Kerler

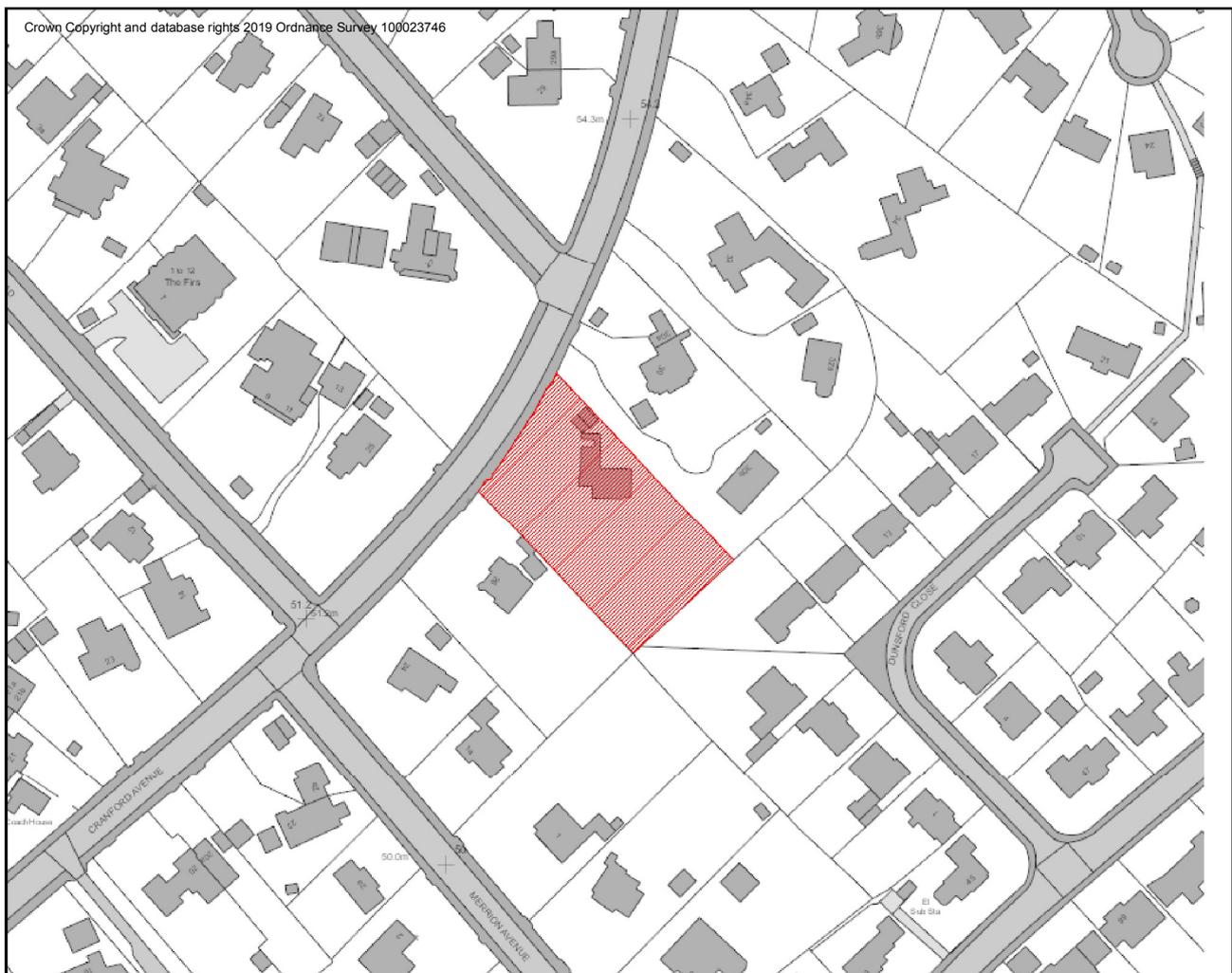
**Location** 28 Cranford Avenue Exmouth EX8 2PZ

**Proposal** Demolition of existing dwelling and construction of 10 no. apartments, with associated parking, cycle and amenity space



**RECOMMENDATION:**

1. That the Habitat Regulations Appropriate Assessment contained within the report be adopted; and,
2. The application be APPROVED subject to conditions.



|                                    |                                                                                                                                |                                                     |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
|                                    |                                                                                                                                | <b>Committee Date: 3<sup>rd</sup> December 2019</b> |
| <b>Exmouth Littleham (Exmouth)</b> | <b>19/1258/MFUL</b>                                                                                                            | <b>Target Date: 11.09.2019</b>                      |
| <b>Applicant:</b>                  | <b>Mr &amp; Mrs Kerler</b>                                                                                                     |                                                     |
| <b>Location:</b>                   | <b>28 Cranford Avenue Exmouth</b>                                                                                              |                                                     |
| <b>Proposal:</b>                   | <b>Demolition of existing dwelling and construction of 10 no. apartments, with associated parking, cycle and amenity space</b> |                                                     |

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- 1. That the Habitat Regulations Appropriate Assessment contained within the report be adopted; and,**
- 2. The application be APPROVED subject to conditions.**

**EXECUTIVE SUMMARY**

**This application was deferred from the last meeting for a Site Inspection to assess the impact on the character and appearance of the area and impact on the amenity of surrounding residents.**

**The application was originally before Members as the officer recommendation differs from the view of the Ward Members and Town Council.**

**The application proposes the demolition of the existing dwelling and the construction of 10 apartments.**

**The site lies within the built up area boundary of Exmouth and is located within The Avenues area of the town, where there is good access to a range of services and infrastructure required for daily living, such that in accordance with Strategy 6 of the East Devon Local Plan the site is considered to lie in a sustainable location to support housing growth.**

**The proposed building would be gable fronted onto the road, albeit set back by 23 metres which would not be at odds with the prevailing character of the area where there are a mix of dwelling styles. The materials have been amended through the course of the application to rendered elevations under a red tiled roof rather than red brick under a grey tiled roof which are considered more appropriate in this area of The Avenues.**

The part of the proposal that is more uncharacteristic with the immediate surroundings would be 22 parking spaces set to the front of the building. However the parking spaces are proposed to be set behind the existing boundary wall which has established planting upon it and as a result the parking spaces would not be highly visible in the street scene.

Whilst the scale of the proposed building would be larger than the existing dwelling and those close to the site, it is not considered to be detrimental to the visual amenity of the area given that it is set in from the boundaries of the site on a large plot, is designed with a central flat-roof to minimise its height and retains a traditional appearance.

The site coverage would be increased over the existing situation (to 38%) and whilst this exceeds the 25% coverage as advocated by the Avenues Design Statement, no harm can be identified as arising from this that could justify a refusal of planning permission given the remaining undeveloped areas around the building and the screening of the car park by the front boundary and planting.

The impact on the residential amenity of the occupiers of Nos. 26, 30 and 30b Cranford Avenue and 9 Dunsford Close have been assessed and the impact is considered to be acceptably addressed through the design of the building, distances retained and location of windows.

Other impacts from the development on the highway network, trees, ecology and drainage have all been found to be acceptable and therefore it is recommended that the application be approved.

## **CONSULTATIONS**

### **Local Consultations**

#### Parish/Town Council

25/06/19 - Meeting 24.06.19

Objection on grounds of size, mass and design. The scale of the property was bigger than that specified in the Avenue Design Statement.

Further comments 03/09/19 - Meeting 02.09.19

Objection sustained, amended plans do not mitigate previous concerns.

#### Exmouth Littleham - Cllr Bruce De Saram

28/06/19 - I recognise that this site is located within the built-up area boundary of Exmouth in a sustainable location close to essential services and infrastructure required for daily living together with good transport links by public transport. As such the principle of residential development is considered to be acceptable under the provisions of Strategies 6 (Development within Built-Up Area Boundaries) and 22 (Development at Exmouth) of the East Devon Local Plan. I would also agree as TARA points out that many of the traditional villas upon which The Avenues had been

developed since 1890 have long since disappeared to be replaced with blocks of flats and apartments.

However if you look closely at Policy D1 it clearly states that proposals will only be permitted where they ensure the scale, massing, density, height, fenestration and materials of buildings relate well to their context. In this instance I do not think that the proposed form of the proposed building has been designed to be reflective of that existing within the vicinity as per Policy D1 since the proposal would appear to lack a variety of building form and a layout which provides some articulation and visual interest. I believe that this proposal must therefore be viewed as an over development of the site which is not in line with the recommendations made in the Avenues Design Statement now enshrined as a SPD within the Exmouth Neighbourhood Plan. This can be seen at Page 57 of the Neighbourhood Plan specifically Policy EB2 "New development should be mindful of surrounding building styles and ensure a high level of design as exemplified in the Avenues Design Statement (2005)" The recommendation contained in the statement was for the scale of any future development to retain the balance between buildings and greenery and should not cover more 25% of the plot, including garages and parking areas, in order to retain the spaciousness of the site.

In conclusion I note that this proposal fails to satisfy Policy D1 and Policy EB2 for the reasons I have stated which was confirmed by the recent Town Council's Planning recommendation for refusal on the grounds of objection on grounds of size, mass and design. The scale of the property was bigger than that specified in the Avenue Design Statement. Therefore in this case refusal could be justified in my opinion on these grounds.

#### Exmouth Littleham - Cllr Nick Hookway

11/07/19 - Comments: Having examined this application in detail, having attended the Exmouth Town Council planning meeting when this application was rejected and also having made a site visit to neighbouring properties, I find it very difficult to support this application. As a property in "The Avenues" area of Exmouth, this application needs to consider the requirements of the "Exmouth Neighbourhood plan". It would appear that this application does not, for it is too large in terms of height and area. The chosen colour scheme for the application would not fit in with surrounding properties either. I am also concerned that neighbouring properties would be unduly affected by increased traffic, noise and visual intrusion. Therefore the harm that this application will cause on "The Avenues" needs to be carefully considered.

Finally, I must reserve my position until I am in full possession of all the relevant facts and arguments both for and against when this application comes before DMC

#### Exmouth Littleham - Cllr Chris Wright

02/07/19 - Having regard to this proposed development and the information available and having viewed the site I am unable to support the application.

I believe the proposal in scale, height and massing represents an overdevelopment of the site. The scale will mean the proposed building will be visually intrusive and conflict aesthetically with surrounding properties.

The development also fails to meet the recommendations of the Avenues Design Statement.

On these grounds I would recommend refusal of this application.

## **Technical Consultations**

### County Highway Authority

09/07/19 - Observations:

The development is located on the C595.

The development intends to use the existing access that serves the original dwelling. The proposed layout provides off-carriageway parking, and cycle parking to promote car reliance reduction, in addition to the space required for vehicles to turn and re-enter the carriageway in a forward gear motion, the safest option and our policy for all A, B and C classified roads.

An increase of traffic generation would be expected from this development, however with the local facilities and services that Exmouth provides, together with the train service, bus service, Exe-Estuary Trail and complementary cycle parking on this site, I do think that it will not be as evident as 10 apartments would create in many parts of Devon.

Therefore the County Highway Authority has no objection to this planning application.

Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF

DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, MAY WISH TO RECOMMEND CONDITIONS ON ANY GRANT OF PLANNING PERMISSION

No development shall take place until details of secure cycle/scooter storage facilities have been submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved details.

REASON: To promote sustainable travel to in accordance with the East Devon Local Plan 2013-2031.

Further comments:

10/09/19 - Addendum; 10/09/2019

The County Highway Authority is satisfied that the amendments to the plans regarding this application does not effect our stance upon this application.

Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, MAY WISH TO

RECOMMEND CONDITIONS ON ANY GRANT OF PLANNING PERMISSION

Prior to commencement of any part of the site the Planning Authority shall have received and approved a Construction Management Plan (CMP) including:

- (a) the timetable of the works;
- (b) daily hours of construction;
- (c) any road closure;
- (d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;

- (e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;
- (g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;
- (h) hours during which no construction traffic will be present at the site;
  
- (i) the means of enclosure of the site during construction works; and
  
- (j) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site
  
- (k) details of wheel washing facilities and obligations
  
- (l) The proposed route of all construction traffic exceeding 7.5 tonnes.
  
- (m) Details of the amount and location of construction worker parking.

#### EDDC Trees

15/07/19 - No objection to the principle of the proposed scheme. However a number of points will need addressing either prior to approval, or subject to pre-commencement planning conditions as follows:

The main site access is relatively close to the Beech (T1) and within its root protection area. The arboricultural report rightly makes reference to the retention of the existing tarmac surface within the root protection area of the this tree. However, the submitted proposed site plan, shows this access as permeable pavements. The proposed site plan and landscape plans will need to be update to reflect the recommendations of the arboricultural report. We will also need to see spot levels as to how the proposed parking and driveway will tie in with the existing tarmac driveway.

The submitted arboriculture method statement needs to make it explicit the tree protection fencing is to be installed prior to the commencement of any works on site.

Proposed landscaping scheme to the property requires enhancement and additional detail details to include areas of shrub and herbaceous planting, tree planting, and what areas will be grassed.

Details of all underground service runs also needs to be established to ensure they avoid retained trees.

Further comments:

06/09/19 - No objection to the submitted drainage plans.

Notwithstanding the above, the points from my earlier consultation response do not appear to have been addressed.

#### DCC Flood Risk Management Team

04/07/19 - At this stage, we object to this planning application because we do not believe that it satisfactorily conforms to Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan (2013-2031). The applicant will therefore be required to submit additional information in order to demonstrate that all aspects of the proposed surface water drainage management system have been considered.

#### Observations:

The applicant has not provided sufficient information in relation to the disposal of surface water from the site to enable me to make observations on the proposal. The applicant must therefore submit a surface water drainage management plan which demonstrates how surface water from the development will be disposed of in a manner that does not increase flood risk elsewhere, in accordance with the principles of Sustainable Drainage Systems. The applicant is therefore advised to refer to Devon County Council's draft Sustainable Drainage Design Guidance, which can be found at the following address:

<https://www.devon.gov.uk/floodriskmanagement/sustainable-drainage/suds-guidance/>.

The submitted Flood Risk Assessment (Ref: 7697, dated February 2017) stated that 'the disposal of the surface water from the development will be by way of existing surface water drainage where applicable.

This will not lead to an increase in the hydraulic load existing upon the existing surface water drainage'. This is however, contradicting with the proposed drainage strategy in the submitted Drawing 7697-14 Drainage Strategy, Rev B where the surface water is proposed to discharge to the attenuation storage tank with restricted flow discharge into the existing public combined sewer. The footprint of the proposed new development is bigger than the existing dwelling and hence there is likely to be an increase in the impermeable area and therefore an increase in the surface water runoff.

The applicant should note that in accordance with the hierarchy of drainage solutions, infiltration should be considered first. The applicant will therefore be required to carry out infiltration tests, in strict accordance with BRE Digest 365 Soakaway Design (2016) in order to demonstrate whether infiltration is a viable means of surface water drainage management on this site. A representative number of tests must be conducted in order to provide adequate coverage of the site, with particular focus placed on the locations and depths of potential infiltration devices.

The applicant should also note that in accordance with the SuDS Management Train, surface water should be managed at source in the first instance. The applicant will therefore be required to explore the use of a variety of above-ground source control components across the whole site to avoid managing all of the surface water from the proposed development at one concentrated point (e.g. a single attenuation pond).

Examples of these source control components could include permeable paving (which could be underdrained), formalised tree pits or other bioretention features such as rain gardens, as well as green roofs, swales and filter drains.

Underground systems cannot be considered as truly sustainable means of drainage because they do not provide the required water quality, public amenity and biodiversity benefits, which are some of the underpinning principles of SuDS. Consequently, above-ground SuDS components should be utilised unless the applicant can robustly demonstrate that they are not feasible; in almost all cases, above- and below-ground components can be used in combination where development area is limited.

The applicant will also be required to submit MicroDrainage model outputs, or similar, in order to demonstrate that all components of the proposed surface water drainage system have been designed to the 1 in 100 year (+40% allowance for climate change) rainfall event. The applicant has currently used a climate change uplift value of 30% as mentioned in the submitted Drawing 7697-14 Drainage Strategy, Rev B. The applicant should also clarify the use of 1 hour critical storm duration and a discharge flow rate of 1.5l/s.

The applicant should provide confirmation from South West Water that they have agreement in principle to discharge into their network should the other drainage solutions in accordance with the hierarchy of drainage solutions have been exhausted.

The applicant must submit details of the exceedance pathways and overland flow routes across the site in the event of rainfall in excess of the design standard of the surface water drainage management system.

The applicant must submit information regarding the adoption and maintenance of the proposed surface water drainage management system in order to demonstrate that all components will remain fully operational throughout the lifetime of the development.

Further comments 24/09/2019:

Our objection is withdrawn and we have no in-principle objections to the above planning application at this stage, assuming that the following pre-commencement planning conditions are imposed on any approved permission:

- No part of the development hereby permitted shall be commenced until a programme of percolation tests has been carried out in accordance with BRE Digest 365 Soakaway Design (2016), and the results approved in writing by the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. A representative number of tests should be conducted to provide adequate coverage of the site, with particular focus placed on the locations of the proposed infiltration devices/permeable surfaces.

Reason: To ensure that surface water from the development is discharged as high up the drainage hierarchy as is feasible.

Reason for being a pre-commencement condition: This data is required prior to the commencement of any works as it will affect the permanent surface water

drainage management plan, which needs to be confirmed before development takes place.

- No part of the development hereby permitted shall be commenced until the full results of a groundwater monitoring programme, undertaken over a period of 12 months, has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. This monitoring should be conducted to provide adequate coverage of the site, with particular focus placed on the locations and depths of the proposed infiltration devices.

Reason: To ensure that the use of infiltration devices on the site is an appropriate means of surface water drainage management.

Reason for being a pre-commencement condition: This data is required prior to the commencement of any works as it could affect the permanent surface water drainage management plan, which needs to be confirmed before development takes place.

- No part of the development hereby permitted shall be commenced until the detailed design of the proposed permanent surface water drainage management system has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. The design of this permanent surface water drainage management system will be in accordance with the principles of sustainable drainage systems, and those set out in Drawing Indicative Drainage Strategy (Soakaway) (Drawing No. 7697-22, dated September 2019) and Drawing Drainage Strategy (Drawing No. 7697-14, dated June 2018). No part of the development shall be occupied until the surface water management scheme serving that part of the development has been provided in accordance with the approved details and the drainage infrastructure shall be retained and maintained for the lifetime of the development.

Reason: To ensure that surface water runoff from the development is managed in accordance with the principles of sustainable drainage systems.

Advice: Refer to Devon County Council's Sustainable Drainage Guidance.

- No part of the development hereby permitted shall be commenced until the detailed design of the proposed surface water drainage management system which will serve the development site for the full period of its construction has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. This temporary surface water drainage management system must satisfactorily address both the rates and volumes, and quality, of the surface water runoff from the construction site.

Reason: To ensure that surface water runoff from the construction site is appropriately managed so as to not increase the flood risk, or pose water quality issues, to the surrounding area.

Reason for being a pre-commencement condition: A plan needs to be demonstrated prior to the commencement of any works to ensure that surface water can be managed suitably without increasing flood risk downstream, negatively affecting water quality downstream or negatively impacting on surrounding areas and infrastructure.

Advice: Refer to Devon County Council's Sustainable Drainage Guidance.

- No part of the development hereby permitted shall be commenced until details of the exceedance pathways and overland flow routes across the site in the event of rainfall in excess of the design standard of the proposed surface water drainage management system have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority.

Reason: To ensure that the surface water runoff generated from rainfall events in excess of the design standard of the proposed surface water drainage management system is safely managed.

- No part of the development hereby permitted shall be commenced until the full details of the adoption and maintenance arrangements for the proposed permanent surface water drainage management system have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority.

Reason: To ensure that the development's permanent surface water drainage management systems will remain fully operational throughout the lifetime of the development.

Reason for being a pre-commencement condition: These details need to be submitted prior to commencement of any works to ensure that suitable plans are in place for the maintenance of the permanent surface water drainage management plan, for the reason above.

Observations:

Following my previous consultation response (FRM/ED/1258/2019, dated 03 July 2019 and email response on 22 August 2019), the applicant has submitted additional information (including the Rebuttal to Comments and Objections) in relation to the surface water drainage aspects of the above planning application, for which I am grateful.

The applicant does not wish to carry out any infiltration until a planning approval is secured. The applicant must note that infiltration tests, undertaken in strict accordance with BRE Digest 365 Soakaway Design (2016) must be undertaken during detailed design in this instance in order to demonstrate whether infiltration is a viable means of surface water drainage management on this site. A representative number of tests must be conducted in order to provide adequate coverage of the site, with particular focus placed on the locations and depths of potential infiltration devices.

An indicative size and location of the soakaway is submitted to support the application. The calculation would need to be revised during the detailed design stage using the infiltration rate from the infiltration testing results. The current submitted calculations use a FoS of 1.0. A minimum Factor of safety (FoS) of 1.5 should be used for the design but it is recommended to use a FoS of 2.0.

The applicant has also submitted an alternative attenuation tank option to support the application and obtained confirmation from South West Water to discharge into their sewer should the infiltration option is not viable.

### **Other Representations**

22 representations have been received as a result of this application raising the following concerns:

- The scale of the development is too substantial for the area;
- Overlooking
- Overbearing (dominate views from garden)
- Noise and fumes from large car park
- Excessively high in relation to surrounding properties
- Detrimental impact on the street scene
- Contrary to The Avenues Design Statement
- Does not respect the key characteristics and special qualities of its context
- The current screening is not in the applicant's control
- Inappropriate use of materials
- Other examples of similar development cited by the agent are not close to the application site
- Loss of important trees
- Contrary to both local plan policy and those of the neighbourhood plan
- Disruption during construction period from vans being parked on the roads
- Impact on local wildlife
- Impact on the town's infrastructure, shops, schools, doctors etc...
- Light pollution

### **Relevant Planning Policies**

#### Adopted East Devon Local Plan 2013-2031 Policies

Strategy 6 (Development within Built-up Area Boundaries)

Strategy 22 (Development at Exmouth)

EN5 (Wildlife Habitats and Features)

D1 (Design and Local Distinctiveness)

D2 (Landscape Requirements)

D3 (Trees and Development Sites)

EN22 (Surface Run-Off Implications of New Development)

EN14 (Control of Pollution)

TC7 (Adequacy of Road Network and Site Access)

TC9 (Parking Provision in New Development)

#### Government Planning Documents

NPPF (National Planning Policy Framework 2019)

National Planning Practice Guidance

#### Other Plans

Exmouth Neighbourhood Plan (Made)

EB2 - Design

#### **Relevant Planning History**

14/1258/MOUT - Outline application with all matters reserved for demolition of existing dwelling and construction of 60 bed dementia care home with nursing accommodation  
- Refused for the following reasons:

1. The application by virtue of the number of bedrooms proposed and likely scale, height, mass and form of the resultant building to provide this level of accommodation fails to demonstrate that the proposal would not be out of character with the surrounding context and appear as a visually intrusive, incongruous and overbearing addition to the detriment of the character and appearance of the area. As such it would be contrary to Policies S4 (Development within Built-up Area Boundaries) and D1 (Design and Local Distinctiveness) of the East Devon Local Plan, Strategy 6 (Development within Built-up Area Boundaries) and Policy D1 (Design and Local Distinctiveness) of the emerging New East Devon Local Plan, The Design Statement for the Avenues, and Government Guidance provided in the NPPF.

2. The application by virtue of the number of bedrooms proposed and likely scale, height, design and proximity to the boundary of the resultant building fails to demonstrate that it would not have an overbearing, visually intrusive or oppressive impact on the residential amenity of occupiers of neighbouring properties. In addition the proposal has the potential to result in the overlooking and consequent loss of privacy for the occupiers of surrounding properties to the detriment of the amenities of surrounding residents. The proposal is therefore contrary to Policy D1 (Design and Local Distinctiveness) of the East Devon Local Plan, Policy D1 (Design and Local Distinctiveness) of the emerging New East Devon Local Plan and Government Guidance provided in the NPPF.

18/0674/OUT – 26 Cranford Avenue - Demolition of existing detached garage and alterations to existing vehicular access, construction of single storey dwelling (outline application seeking approval for access (matters of appearance, landscaping, layout and scale reserved). Approved 4<sup>th</sup> June 2018 subject to conditions including a condition that the building be single-storey only in the interests of the character of the

area and residential amenity given the backland nature of the proposal and close relationship to neighbouring properties.

### **Site Location and Description**

No 28 Cranford Avenue is a large detached dwelling located on the eastern side of the road and in the northern part of The Avenues area of Exmouth. The house stands on the northern side of its large plot and at an angle to its road frontage, which is presently defined by a low fence positioned on top of a stone wall, the combined height of which still allows views of the house from the road. The house is rendered with a plain tiled roof.

It is a two storey property with a single storey 'wing' on its northern side, which includes a garage closest to the frontage. Vehicular access into the garage is taken from a gated entrance at the northern end of the frontage. A gate at the southern end of the frontage provides a separate pedestrian access into the property.

### **Proposed Development**

Planning permission is sought for demolition of the existing dwelling at 28 Cranford Avenue, Exmouth and the erection of a detached building comprising 10 apartments set over three floors (room in the roof).

The building would measure 21.5 metres in length by 20 metres in width to a maximum ridge height of 9.5 metres

The existing access would remain but the parking area would be increased in size to accommodate 22 parking spaces, cycle storage and a bin store.

### **Issues and Assessment**

The main issues in the assessment of this proposal are considered to be:

- The principle of the proposed development
- The impact of the development on its surroundings
- The impact on residential amenity;
- The impact on highway safety;
- Trees and landscaping;
- Ecology;
- Drainage; and
- Habitat Mitigation

### **Principle**

The site lies within the built up area boundary of Exmouth and is located within The Avenues area of the town, where there is good access to a range of services and facilities required for daily living, such that in accordance with Strategy 6 of the East Devon Local Plan and the adopted Neighbourhood Plan the site is considered to lie in a sustainable location to support housing growth.

The existing dwelling on the application site is an attractive two storey rendered house under a clay plain tiled roof that sits comfortably within the level gardens but it is not a listed building, nor within a conservation area and is not considered to be a non-designated heritage asset.

Accordingly, the proposal is considered to be acceptable in principle providing its impacts are acceptable in relation to other policies contained in the Local Plan together with any relevant material considerations.

### **Impact of the development on its surroundings**

The proposed development would take a more contemporary approach to providing development on this site and the building would have a scale that would be larger than that of the immediately surrounding dwellings together with a site coverage of more than the 25% advocated by The Avenues Design Statement, however, that does not automatically mean that the proposed development should be refused. There needs to be harm identified from the scale of development and/or from the site coverage of 38% proposed.

One of the foremost objections from the majority of representations received on this application concerns the quantum of development and site coverage being contrary to The Avenues Design Statement. This document was written in 2005 in an attempt to guide applicants on the types of development that would be acceptable in the area, and is a material consideration in the determination of planning applications. One of the stated design principles is in relation to site coverage and the document states:

*'The scale of future developments should seek to retain the balance between buildings and greenery, which is so much a part of the character of the area. Development should not cover more than 25% of the plot to retain the spaciousness of the site. This should include garages and parking areas.'*

Adding weight to the document as a material consideration is that fact that the recently adopted Exmouth Neighbourhood Plan makes reference to the design guidance in Policy EB2 in the following way:

*'New development should be mindful of surrounding building styles and ensure a high level of design as exemplified in the Avenues Design Statement (2005).'*

An assessment is therefore needed of what harm arises from exceeding the 25% site coverage, whether this is harmful enough to justify refusal of planning permission and whether there are any other material considerations that outweigh the design guidance.

In this instance the proposed building would be gable fronted onto the road, albeit set back by 23 metres which would not be at odds with the prevailing character of the area where there are a mix of dwelling styles.

The materials have been amended through the course of the application to rendered elevations under a red tiled roof rather than red brick under a grey tiled roof which are considered more appropriate in this area of The Avenues.

What would be more uncharacteristic of the area is the provision of 22 car parking spaces set to the front of the building. However, this would be set behind the existing boundary wall and established planting and therefore would not be highly visible in the street scene. It can be further softened by further landscaping and tree planting secured by condition. With retained and increased planting, you would not perceive the car parking area other than on entry to the site. As such it would be difficult to identify to an Inspector harm to the visual amenity of the area that is significant enough to justify refusal of planning permission.

The site coverage would be increased over the existing situation (to 38%) and whilst this exceeds the 25% coverage advocated by the Avenues Design Statement, no harm can be identified as arising from this that could justify a refusal of planning permission given the remaining undeveloped areas around the building, visual impact from the street scene, and the screening of the car park by the front boundary and planting.

Whilst the scale of the proposed building would be larger than the existing dwelling and those adjoining the site, again it is not considered to be so out of scale to be detrimental to the visual amenity of the area. Particularly given that it is set in from the boundaries of the site on a large plot, is designed with a central flat-roof to minimise its height and retains a traditional appearance.

Therefore, whilst the building would have a different appearance from the street in terms of its overall scale and an increased site coverage compared to the existing dwelling, its impact on its surroundings (taking into account the amended materials) is not considered to be harmful enough to be able to justify refusal.

### **Impact on residential amenity**

The foremost properties to be impacted upon as a result of this proposal are those immediately surrounding the site, namely - 26 Cranford Avenue, 30 Cranford Avenue, 30b Cranford Avenue and 9 Dunsford Close. The impact on each of these properties will be addressed in turn.

#### **26 Cranford Avenue**

This property is located to the south of the site on a noticeably smaller plot than the application site, it comprises a two storey detached dwelling with detached garage and another ancillary storage building adjacent to the boundary. The boundary is formed by a Devon bank hedgerow with mature trees on top of it which provide good screening between the two properties. There are windows on the side elevation of No. 26 Cranford Avenue which face towards the application site, however these are predominantly secondary windows to rooms where there are larger windows on the front and rear elevations.

The proposed building would be two storeys in height (with rooms in the roof forming a third floor) set 17.5 metres away from the side elevation of No. 26 and contain 4no. windows on the first floor facing towards No. 26, two of which would be obscure glazed, the two other windows would serve bedrooms. Whilst the scale of the proposed building would be somewhat greater than the existing dwelling, it is considered that

existing landscaping together with the limited number of clear glazed windows (serving non-habitable rooms) and the separation distance is sufficient to not detrimentally impact upon the living conditions of the occupiers of No. 26 Cranford Avenue.

### 30 Cranford Avenue

This property is located to the north of the site on a noticeably smaller site that has previously been subdivided into two properties, it comprises a two storey semi-detached property with detached garage between the host dwelling and application site. There is a vehicular access serving a third party property (30b Cranford Avenue) between the application site and No. 30, the boundary between the application site and vehicular access is formed by a mature hedgerow that has recently been managed and trimmed to encourage future growth. Due to the orientation of No. 30 and the proposal building none of the windows on the front or side elevation of No.30 would directly face the proposal building, instead the impact would be on the private amenity space.

There would be a separation distance of 22 metres between properties, one bedroom window would have views towards the existing garden area of No. 30 between the existing garage and mature trees at the end of the garden, this would be a similar arrangement to that that already exists between No.30 and the existing dwelling on the application site and therefore it is considered that the proposal would not impact any more detrimentally on residential amenity than the existing dwelling does.

### 30b Cranford Avenue

This property also lies to the north of the application site, it was an infill room in the roof dwelling and was previously part of the curtilage of No. 30 Cranford Avenue. The front elevation of No. 30b faces directly towards the rear portion of the application site where no building works are proposed to take place, however, as the front elevation is nearly all glazed views from the main habitable rooms, the bulk of the proposed building would be visible.

Amended plans have been received during the determination of the application that have reduced the length of the building on its northern side. With the existing mature landscaping, the oblique angles between the properties mean overlooking would be very difficult. There is a separation distance of 18 metres and as such it is considered that the proposed building would not cause a detrimental impact on the living conditions of 30b.

### 9 Dunsford Close

This property lies to the east of the application site and is accessed by Dunsford Close which is a cul-de-sac of bungalows. The rear elevation of the bungalow faces towards the application site. There is a separation distance in excess of 35 metres between the rear elevation of the proposal building and the existing bungalow such that it is considered that there would not be a detrimental impact in terms of overlooking or the building being overbearing.

Accordingly, it is considered that the proposed development would not detrimentally impact upon residential amenity in accordance with Policy D1 of the East Devon Local Plan.

### **Impact on highway safety**

The site is served by a dedicated access off the public highway which is a residential feeder road, it has good visibility from and of emerging vehicles. The proposal seeks to provide 22 on-site parking spaces (2no. parking spaces for each of the apartments and 2no. visitor spaces), which would accord with Policy TC9 of the EDDC Local Plan. The car park uses a mixture of permeable pavers and grass crete around a central turning area such that vehicles can enter and leave the site in a forward gear.

Devon County Highways Engineer raises no objections to the proposed development subject to provision of a cycle/scooter store, however, there is cycle store indicted on the site plan, details of its enclosure would be required by condition.

The proposal is therefore considered acceptable in relation to Policies TC7 and TC9 of the EDDC not impacting unreasonably on highway safety.

### **Trees and landscaping**

The main site access lies relatively close to a beech tree (T1) and within its root protection area. The arboricultural report makes reference to the retention of the existing tarmac surface within the root protection area of this tree. However, the submitted proposed site plan, shows this access as permeable pavements. The recommendations of the arboricultural report would be conditioned on any approval to safeguard the long term future of the mature tree. Conditions would also be required to ensure tree protection fencing is provided on site prior to any other works taking place. The Councils Tree Officer raises no objections in principle subject to appropriate safeguarding conditions.

There is good boundary treatment on all boundaries of the site, however, there are places where the existing boundaries could be enhanced, as such details of a comprehensive landscaping scheme, including planting within the car park and retention and enhancement of the frontage planting, should be secured through an appropriately worded condition to result in a suitable visual impact.

The proposal is therefore, subject to conditions, considered to be acceptable in relation to Policies D2 and D3 of the EDDC Local Plan.

### **Ecology**

A phase 1 ecological assessment has been carried out on the existing buildings on site together with land in its curtilage to determine the presence or otherwise of protected species that may be affected by the proposed development, due to protected bat species being found a phase 2 bat emergence survey has also been carried out. The results of the survey and proposed mitigation can be summarised as follows:

The phase 1 survey identified high potential to support crevice dwelling bats on the exterior of the house, primarily beneath a number of raised roof tiles, hanging tiles and gaps beneath the ridge tiles, bat droppings were also found in the garage as there were small gaps evident in the hanging tiles.

Due to evidence of bats being found a phase 2 bat emergence survey were undertaken in May 2019. One common pipistrelle bat was recorded emerging from beneath hanging tiles on the garage but not recorded re-entering the building during the dawn survey. The survey results suggest that the garage is used regularly as a summer day roost by an individual bat. No other bats were recorded emerging or re-entering the house or garage. However, regular foraging activity by common pipistrelle and occasional foraging by Nathuse pipistrelle and serotine bats was recorded along the site boundaries. Occasional passes from Noctule bats were also recorded. Mitigation in the form of bat tubes or habitat boxes should be incorporated into the design of the buildings on the southern elevation and lighting of the building should not impact on the hedgerows using specific light bulbs and appropriate angling.

During the third emergence survey a female slow-worm was observed on the short, mown lawn grass. As the site has a patch of longer, unmanaged grass located in the southeast corner, it is likely to provide foraging opportunities for this species, though due to its size is likely to only support a low population. Mitigation in the form of a hibernaculum and an area of longer grass to be maintained in the rear part of the site has been suggested in the ecology report.

An ecological management plan has been submitted indicating who will be responsible for the maintenance of the habitat features recommended in the ecology report during construction (developer) and post construction (management company).

Accordingly, subject to mitigation being secured and managed in accordance with the ecology report and ecological management plan, the proposed development is considered to be acceptable, not impacting unreasonably on protected species in accordance with Policy EN5 of the EDDC Local Plan.

## **Drainage**

It is proposed to provide soakaways to accommodate the surface water produced by the proposed development.

In consultation with Devon County Flood Risk Department the applicant has provided indicative details of a system that would be installed, the following comments have been received from DCC Flood Risk:

The applicant does not wish to carry out any infiltration until a planning approval is secured. The applicant must note that infiltration tests, undertaken in strict accordance with BRE Digest 365 Soakaway Design (2016) must be undertaken during detailed design in this instance in order to demonstrate whether infiltration is a viable means of surface water drainage management on this site. A representative number of tests must be conducted in order to provide adequate coverage of the site, with particular focus placed on the locations and depths of potential infiltration devices.

An indicative size and location of the soakaway is submitted to support the application. The calculation would need to be revised during the detailed design stage using the infiltration rate from the infiltration testing results. The current submitted calculations use a FoS of 1.0. A minimum Factor of safety (FoS) of 1.5 should be used for the design but it is recommended to use a FoS of 2.0. The applicant has also submitted an alternative attenuation tank option to support the application and obtained confirmation from South West Water to discharge into their sewer should the infiltration option is not viable.

Accordingly, subject to appropriately worded safeguarding conditions that will need to be satisfied prior to commencement of development, the proposal is considered to be acceptable in accordance with Policy EN22 of the EDDC Local Plan.

### **Habitat Mitigation Appropriate Assessment**

The site is located in close proximity to the Exe Estuary and the East Devon Pebblebed Heaths Special Protection Areas (SPA's) which provide an important recreational resource for the local community. However, these are sensitive environments which are important to nature conservation and are subject to European wildlife site designations.

Despite the introduction of the Community Infrastructure Levy (CIL) where a proportion of CIL goes towards infrastructure to mitigate any impact upon habitats, contributions towards non-infrastructure mitigation are also required as developments that will impact on a protected habitat cannot proceed under an EU directive unless fully mitigated. Evidence shows that all new dwellings and tourist accommodation within 10 kilometres of the Exe Estuary and/or the Pebblebed Heaths Special Protection Areas (SPA's) will have a significant effect on protected habitats which is reflected in Strategy 47 (Nature Conservation and Geology) of the Local Plan. This proposal is within 10 km of the Exe Estuary and the Pebblebed Heaths and would therefore attract a habitat mitigation contribution (being received before 21<sup>st</sup> August 2019) towards non-infrastructure at a rate of £201.61 per dwelling. As this contribution has been secured, there are no likely significant effects and the ecological impacts are adequately mitigated.

### **Conclusion**

The site lies within the built up area boundary of Exmouth and as such the principle of development is acceptable.

The proposed building is suitably designed and set back by 23 metres which would not be at odds with the prevailing character of the area where there are a mix of dwelling styles. Materials have been amended through the course of the application and are considered more appropriate in this area of The Avenues.

Whilst the parking area for 22 cars to the front of the building is uncharacteristic with the immediate surroundings, the parking spaces are proposed to be set behind an existing boundary wall which has established planting upon it. Given this, and with further landscaping to the site, the parking spaces would not be highly visible in the street scene.

Whilst the scale of the proposed building would be larger than the existing dwelling, it is not considered to be detrimental to the visual amenity of the area given that it is still set in from the boundaries of the site on a large plot, and of a design that is of a traditional appearance and minimises its height.

The site coverage would be increased over the existing situation (to 38%) and whilst this exceeds the 25% coverage as advocated by the Avenues Design Statement, no harm can be identified as arising from this that could justify a refusal of planning permission given the remaining undeveloped areas around the building, the screening of the car park by the front boundary and planting and the wider benefit of the provision of a greater number of dwellings and more efficient use of the site.

The impact on the residential amenity of the occupiers of Nos. 26, 30 and 30b Cranford Avenue and 9 Dunsford Close have been assessed and the impact is considered to be acceptably addressed through the design of the building, distances retained and location of windows.

Other impacts from the development on the highway network, trees, ecology and drainage have all been found to be acceptable and therefore it is recommended that the application be approved.

## **RECOMMENDATION**

- 1. That the Habitat Regulations Appropriate Assessment contained within the report be adopted; and,**
- 2. The application be APPROVED subject to the following conditions.**

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission and shall be carried out as approved.  
(Reason - To comply with section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
2. The development hereby permitted shall be carried out in accordance with the approved plans listed at the end of this decision notice.  
(Reason - For the avoidance of doubt.)
3. No part of the development hereby permitted shall be commenced until a programme of percolation tests has been carried out in accordance with BRE Digest 365 Soakaway Design (2016), and the results approved in writing by the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. A representative number of tests should be conducted to provide adequate coverage of the site, with particular focus placed on the locations of the proposed infiltration devices/permeable surfaces.  
Reason: To ensure that surface water from the development is discharged as high up the drainage hierarchy as is feasible in accordance with Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan.

Reason for being a pre-commencement condition: This data is required prior to the commencement of any works as it will affect the permanent surface water drainage management plan, which needs to be confirmed before development takes place.

4. No part of the development hereby permitted shall be commenced until the full results of a groundwater monitoring programme, undertaken over a period of 12 months, has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. This monitoring should be conducted to provide adequate coverage of the site, with particular focus placed on the locations and depths of the proposed infiltration devices.

Reason: To ensure that the use of infiltration devices on the site is an appropriate means of surface water drainage management in accordance with Policy EN22 (Surface Run-Off Implications of New Development).

Reason for being a pre-commencement condition: This data is required prior to the commencement of any works as it could affect the permanent surface water drainage management plan, which needs to be confirmed before development takes place.

5. No part of the development hereby permitted shall be commenced until the detailed design of the proposed permanent surface water drainage management system and detailed design of the proposed surface water drainage management system which will serve the development site for the full period of its construction together with full details of the adoption and maintenance arrangements for the proposed permanent surface water drainage management system has been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority. The design of this permanent surface water drainage management system will be in accordance with the principles of sustainable drainage systems, and those set out in Drawing Indicative Drainage Strategy (Soakaway) (Drawing No. 7697-22, dated September 2019) and Drawing Drainage Strategy (Drawing No. 7697-14, dated June 2018). Full details of No part of the development shall be occupied until the surface water management scheme serving that part of the development has been provided in accordance with the approved details and the drainage infrastructure shall be retained and maintained for the lifetime of the development.

Reason: To ensure that surface water runoff from the development is managed in accordance with the principles of sustainable drainage systems in accordance with Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan.

Reason for being a pre-commencement condition: A plan needs to be demonstrated prior to the commencement of any works to ensure that surface water can be managed suitably without increasing flood risk downstream, negatively affecting water quality downstream or negatively impacting on surrounding areas and infrastructure.

6. No part of the development hereby permitted shall be commenced until details of the exceedance pathways and overland flow routes across the site in the event of rainfall in excess of the design standard of the proposed surface water drainage management system have been submitted to, and approved in writing by, the Local Planning Authority, in consultation with Devon County Council as the Lead Local Flood Authority.

Reason: To ensure that the surface water runoff generated from rainfall events in excess of the design standard of the proposed surface water drainage management system is safely managed in accordance with Policy EN22 (Surface Run-Off Implications of New Development) of the East Devon Local Plan.

Reason for being a pre-commencement condition: A plan needs to be demonstrated prior to the commencement of any works to ensure that surface water can be managed suitably without increasing flood risk downstream, negatively affecting water quality downstream or negatively impacting on surrounding areas and infrastructure.

7. Prior to commencement of any part of the site the Planning Authority shall have received and approved a Construction Management Plan (CMP) including:

- (a) the timetable of the works;
- (b) daily hours of construction;
- (c) any road closure;
- (d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;
- (e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;
- (g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;
- (h) hours during which no construction traffic will be present at the site;
- (i) the means of enclosure of the site during construction works; and
- (j) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site
- (k) details of wheel washing facilities and obligations
- (l) The proposed route of all construction traffic exceeding 7.5 tonnes.
- (m) Details of the amount and location of construction worker parking.

Reason: to ensure that the construction period is managed in an appropriate manner and does not detrimentally impact on the amenity of the occupiers surrounding residential properties and in the interests of highway safety in

accordance with Policies D1 (Design and Local Distinctiveness), EN14 (Control of Pollution) and TC7 (Adequacy of Site Access and Road Network) of the East Devon Local Plan.

8. The parking and turning areas identified on drawing number 7697-13 Rev C received on 30.07.2019 shall be permanently set out and reserved for such purposes only unless varied by a further grant of planning permission.  
Reason: To ensure that there are adequate facilities available for traffic attracted to the site in accordance with Policy TC9 (Parking Provision in New Development) of the East Devon Local Plan.
9. Prior to first occupation of the building hereby approved the bin store indicated on drawing number 7697-13 Rev C shall be provided in accordance with details that shall have previously been submitted to and approved in writing by the Local Planning Authority. The bin store shall thereafter be retained and maintained for the storage of refuse and recycling receptacles only.  
Reason: To ensure that there is adequate provision of bin storage for the occupiers of the proposed development and to ensure that the design of the structure is acceptable in relation to its surroundings in accordance with Policy D1 (Design and Local Distinctiveness) of the East Devon Local Plan.
10. Notwithstanding the details provided on drawing number 7697-15 Rev B, no development above foundation level shall take place until a revised and more robust landscaping scheme has been submitted to and approved in writing by the Local planning Authority. Such a scheme to include the planting of trees, hedges, shrubs, herbaceous plants and areas to be grassed, including retention of the existing frontage planting and new planting to and around the car park. The scheme shall also give details of any proposed walls, fences and other boundary treatment. The landscaping scheme shall be carried out in the first planting season after commencement of the development unless any alternative phasing of the landscaping is agreed in writing by the Local Planning Authority and the landscaping shall be maintained for a period of 5 years. Any trees or other plants which die during this period shall be replaced during the next planting season with specimens of the same size and species unless otherwise agreed in writing by the Local Planning Authority.  
(Reason - To ensure that the details are planned and considered at an early stage in the interests of amenity and to preserve and enhance the character and appearance of the area in accordance with Policies D1 - Design and Local Distinctiveness and D2 - Landscape Requirements of the Adopted East Devon Local Plan 2013-2031.)
11. Prior to the commencement of the development hereby approved (including demolition and all preparatory work), the following tree protection measures as identified in the approved Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) will have been completed:
  - a) The tree protection fencing and / or ground protection shall be in place and in accordance with the agreed specification.

- b) The installed tree protection will have been inspected by an appropriately experience and qualified Arboricultural Consultant commissioned to act as the project Arboricultural Supervisor.
- c) The findings of the Arboricultural Supervisors initial site inspection shall be forwarded to Local planning Authority prior to the commencement of works on site.

During the development hereby approved, the following tree protections measures in the above AMS and TPP will be undertaken:

- d) The AMS and TPP dated shall be strictly followed.
- e) Ad-hock monthly site inspections shall be undertaken by a suitably qualified tree specialist and the finding recorded in the site monitoring log.
- d) Any departures from the approved TPP and AMS shall be reported to the Local Planning Authority in writing within five working days of the site inspection.
- e) Arboricultural supervision of the all manual excavation within the Root Protection Areas (RPA) shall be undertaken. Root pruning that may be required, shall be undertaken in accordance BS 5837:2012 Trees in Relation to Trees in relation to design, demolition and construction - Recommendations Paragraph 7.2.

On completion of the development hereby approved:

- f) A completed site monitoring log shall be submitted to the Planning Authority for approval and final discharge of the tree protection condition.

(Reason: To satisfy the Local Planning Authority that the trees to be retained will not be damaged during demolition or construction and to protect and enhance the appearance and character of the site and locality, in accordance with Policy D3 - Trees and Development Sites of the East Devon Local Plan 2013-2031 and pursuant to section 197 of the Town and Country Planning Act 1990).

- 12. Prior to first occupation of the building hereby approved, the obscure glazing indicated on drawing number 7697-12 Rev B shall be installed and thereafter retained and maintained in perpetuity.  
Reason: To ensure that the living conditions of the neighbours at 26, 30 and 30b Cranford Avenue are maintained in accordance with Policy D1 (Design and Local Distinctiveness) of the East Devon Local Plan
- 13. Development shall proceed in accordance with Section 6 (recommendations) of the Phase 1 bat survey and phase 2 bat emergence survey report dated November 2018 and updated May 2019 and the Ecological Mitigation and Management Plan dated 19/09/2019, unless varied by a further grant of planning permission.  
Reason: To ensure that appropriate mitigation measures are in place for protected species that may be impacted upon as a result of the proposed development in accordance with Policy EN5 (Wildlife Habitats and Features) of the East Devon Local Plan.

14. No development above foundation level shall take place until samples of the materials to be used in the construction of the external surfaces of the building hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.  
 (Reason - To ensure that the materials are considered at an early stage and are sympathetic to the character and appearance of the area in accordance with Policy D1 - Design and Local Distinctiveness of the Adopted East Devon Local Plan 2013-2031.)

NOTE FOR APPLICANT

Informative:

In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 in determining this application, East Devon District Council has worked positively with the applicant to ensure that all relevant planning concerns have been appropriately resolved.

Plans relating to this application:

|                                        |                      |          |
|----------------------------------------|----------------------|----------|
| 7697-LP                                | Location Plan        | 06.06.19 |
| 7697-11 Rev A                          | Proposed Floor Plans | 01.08.19 |
| 7697-12 Rev B                          | Proposed Elevation   | 01.08.19 |
| 7697-13 Rev C                          | Proposed Site Plan   | 01.08.19 |
| 7697-14 Rev C:<br>Drainage<br>Strategy | Other Plans          | 01.08.19 |
| 7697-15 Rev B                          | Landscaping          | 01.08.19 |

List of Background Papers

Application file, consultations and policy documents referred to in the report.