

OTTERY ST MARY TOWN
(Ottery St Mary)

08/2881/MFUL

Target Date: (29.06.2009)

Applicant: Sea Valley Properties

Location: Marist Convent
8 Broad Street
Ottery St Mary

Proposal: Construction of 4 no. Dwellings, 8 no. Apartments and a commercial building with associated parking and amenity facilities

CONSULTATIONS

County Highway Authority

THE EXECUTIVE DIRECTOR OF ENVIRONMENT, ECONOMY AND CULTURE, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, RECOMMENDS THAT THE FOLLOWING CONDITIONS SHALL BE INCORPORATED IN ANY GRANT OF PERMISSION:-

1. Visibility splays shall be provided, laid out and maintained for that purpose at the site access in accordance with the attached diagram 1027-P09 where the visibility splays provide intervisibility between any points on the X and Y axes at a height of 0.6 metres above the adjacent carriageway level.

REASON: To provide adequate visibility from and of emerging vehicles.

2. No part of the development hereby approved shall be brought into its intended use until the access, parking facilities, visibility splays, turning area, parking space and garage/hardstanding, access drive and access drainage have been provided and maintained in accordance with details that shall have been submitted to, and approved in writing by, the Local Planning Authority and retained for that purpose at all times

REASON: To ensure that adequate facilities are available for the traffic attracted to the site

3. This permission shall relate to the amended drawing No. 1027-P01 Revision B and 1027-P09 received by the Local Planning Authority.

REASON: For the avoidance of doubt

Devon County Education Dept.

"The primary school that would be affected by the development is Ottery St Mary Primary School (Summer 2008 number on roll 338, pupil net capacity 335). 12 family dwellings (those of 2 bedrooms or more) could be expected to produce 3 primary aged pupils, which will cause a shortfall of places at the school. The contribution required is £31,242 which would be used to part fund teaching accommodation plus £862.50 for ICT equipment. These calculations are based on the DCSF Cost Multiplier Extension rate for Devon.

The secondary school affected is The Kings School (Autumn 2007 number on roll 1080, pupil net capacity 987). 12 family dwellings could be expected to produce 1.8 secondary pupils, which will cause a shortfall of places at the school. The contribution required is £28,411.20 which would be

used to part fund teaching accommodation plus £2610 for ICT equipment. These calculations are based on the DCSF Cost Multiplier Extension rate for Devon.

In addition to the contribution figures quoted above, the County Council would wish to recover legal costs incurred as a result of the preparation and completion of the Agreement. Legal costs are not expected to exceed £250.00 where the agreement relates solely to the education contribution. However, if the agreement involves other issues or if the matter becomes protracted, the legal costs are likely to be in excess of this sum.”

The total contributions sought from Devon County Council (excluding legal fees) is therefore: £63,125.70

Devon County Archaeologist

I refer to the above application. The proposed development lies within the historic core of Ottery St Mary and groundworks associated with its construction may expose archaeological deposits and artefacts associated with the historic settlement here.

For this reason I would advise that any consent your Authority may be minded to issue should carry the PPG16 paragraph 30 condition whereby

No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

The development shall be carried out at all times in strict accordance with the approved scheme.

Reason To ensure that an appropriate record is made of archaeological evidence that may be affected by the development

I would envisage a suitable programme of work as taking the form of the archaeological monitoring and recording of all groundworks associated with the construction of the proposed development in areas that have not been affected by earlier ground disturbance. In particular the frontage of the application area onto Broad Street may contain evidence of earlier roadside settlement. The results of the fieldwork and any post excavation analysis undertaken would be presented in an appropriately detailed and illustrated report.

I will be happy to discuss this further with you, the applicant or their agent. I can provide the applicant with a Brief setting out the scope of the works required, as well as contact details for archaeological contractors who have recently carried out similar work in Devon.

Natural England

Commented on 17.06.09:

“Natural England believe at this point in time the survey information provided (from Treework Environmental Practice) is insufficient to establish the effect the proposal may have on protected species, and as such we have no option but to object to the application at this stage. We would like to see the results of the recommended bat, badger and reptile surveys, along with any appropriate mitigation before a decision is made.”

Commented on 21.09.09:

“Thank you for re-consulting Natural England with the above application, after looking through the further information I am able to make the following comment:

Based on the new information provided, Natural England now have no objection to the proposed development subject to the inclusion of our recommended conditions and the proposal being carried out in strict accordance with the details of the application. The reason for this view is that we consider that the proposal will not have a significant effect on any protected species.

We advise that the mitigation proposals are assured through a planning condition, using all the recommendations set out in the 'Recommendations' section within the Protected Species Surveys undertaken by Country Contracts in July/August 2009."

Barn Owl Trust

Commented on 14.04.09:

"I have been contacted by a concerned member of the general public, claiming that Barn Owls will be unduly affected by this development. In particular, loss of foraging habitat was mentioned as a potential issue. The Barn Owl Trust has two observations from this area, from 1992 and 2002 but holds no current observations of Barn Owls at the site. However, since no environmental impact assessment is to be carried out, how will the LPA make a decision with due consideration of biodiversity in line with their obligations under the NERC Act (2006) and in policy such as PPS9"

TOWN/PARISH COUNCIL

Comments dated 30.04.2009:

Concerns over the height and size of this development in a Conservation Area which would have an overbearing effect on neighbouring properties resulting in a loss of privacy.

The style of the apartment buildings was considered inappropriate and would result in a detrimental impact on the street scene when viewed from key locations in the town.

The Committee expressed concerns over the number of parking spaces allocated to houses at the top of the site.

Highway and site access issues need to be adequately provided for in any development of this site.

Footpath that runs from top of the site to the bottom through Communal Amenity Area, clarity required if this is for public use or purely for the residents.

The potential instability of the land in connection with water run off into an area of the town prone to flooding.

Environmental issues in particular concerns as to whether a full Ecological Report has been commissioned for this site with particular regard to Badgers, Sloe Worms and Bats.

The use of timber cladding for some aspects of the external elevations was not considered to be in keeping with surrounding properties.

Comments dated 10.06.2009:

Following debate it was felt that the amended application does not go far enough to address the concerns already raised by the Council regarding height and size, style, timber cladding, flood potential, instability of the land. Concern was also expressed that there were misleading height and distance measurements on the drawings due in part to the incorrect scale being shown on one of the drawings. Concerns remain over the highways and safety issues relating to this development both on Broad Street and Franklea Close.

Comments dated 08.09.09:

The Council does not support the amendments. There remain concerns about the height of the building, impact on the streetscene, the safety of the bank, the water run-off and the vehicular access. There was concern that there is no inclusion of an S106 agreement.

WARD MEMBER(S)

Cllr. Giles commented on 28.04.09:

“This application is on my ward and my preliminary view, based on the information presently available, is that it should be REFUSED.

I have numerous concerns about this application.

General issues of development of the site:

Residents of Tip Hill and Franklea Close (including one FC resident who worked on the construction of FC) have expressed concerns about the stability of the site. They claim – with photographic evidence- that the site is unstable, and that there has been land movement and subsidence over the years. I am concerned about the impact on properties on the west side of Tip Hill which are very close to a very steep and apparently unstable bank which towers above them. I am also concerned about the proposed apartments on the north western part of the site planned to be close to, and below a steep bank adjacent to Franklea Close. Before any development of this nature is approved I would wish to see compelling evidence about the stability of the site. The steep gradient of the site from south to north suggests that there will be water run-off problems, and I would wish to see measures to deal with this.

There is anecdotal evidence of protected wildlife species such as barn owls, bats, slow worms and badgers on the site, which is an important green oasis in the centre of Ottery. 21 trees are proposed for removal. Biodiversity issues have not been properly addressed. I believe it is essential that an environmental impact survey is carried out.

Specific issues relating to the application:

I have concerns about the traffic and parking arrangements. Access to the site is proposed from Broad Street and from Franklea Close. Both accesses are far from ideal for the construction traffic (the proposed construction period is far too long and would result in nuisance and disturbance for people living nearby for an unacceptable period) and the traffic generated by the development, should it go ahead. As the Devon County Councillor for Ottery, I have long been concerned about the dangers at the junction of Franklea Close and Winters Lane.

With regard to the dwellings proposed there would be adverse impact on residents of Franklea Close caused by the three storey dwellings proposed for the south of the site; and by the three storey dwellings to the north west of the site. The height and scale of the buildings proposed would be overbearing and have an unacceptable adverse impact on surrounding dwellings.

This site is in a Conservation Area. Should there be agreement to development of this site it is vitally important that the development is visually acceptable from the vicinity of Ottery's Parish Church – from where there is a magnificent panoramic view of the site. I believe that this planning application falls far short of this test.

In the event that the application comes to Committee I would reserve my position until I am in full possession of all relevant facts and arguments for and against.

Cllr. Cox commented on 08.09.2009:

“This is a complex application relating to a prominent and steeply sloping site which straddles the conservation area in the centre of Ottery St. Mary. Whilst I have no objection to the principle of development within the site, my main concern is with the scale and contemporary design of the apartment building. Notwithstanding the reduction in height the structure will impact adversely on the conservation area when viewed from Broad Street and the Church/Paternoster Row, whilst the Franklea Close residents whose gardens abut the western boundary will be faced with a broad expanse of flat roofing and the three storey element of the apartment block which will be out of keeping with the character of the site and the townscape.

Although it is my recommendation that the application should be refused based on the information presently available, in the event that it comes to Committee I reserve my position until I am in possession of all the relevant facts and arguments for and against.”

REPRESENTATIONS

Objections

22 letters of objections from separate households have been received raising the following points:

- Impact on stability of land as a result of required excavation and compaction works.
- Surface water run-off problems exacerbated by proposals.
- Road safety, in particular potential for vehicles using top road to career off site at eastern end as no barrier to prevent this.
- Inadequate fencing on eastern boundary to provide protection from steep bank to east side of the site.
- Loss of privacy to rear garden areas of properties in Tipp Hill.
- Tree planting in close proximity to Tipp Hill bank will increase instability of the soil structure.
- Height of the four town houses on the sky line.
- Potential for further housing proposals in the future to increase viability.
- Highway safety danger through creation of access onto Franklea Close.
- Increased traffic and parking problems in Franklea Close, during and after construction.
- Inadequate on-site parking provision.
- Refuse and recycling area will lead to increased pests/vermin.
- Impact on wildlife on the site, in particular bats, barn owls, badgers and slow worms.
- Impact on residential amenity through noise during construction period.
- The design of the town houses is ill-conceived with little private amenity space.
- Potential impact/loss of Oak tree.
- Loss of amenity through overlooking.
- Loss of view.
- Impact on residential amenity through use of communal garden areas.
- Impact on townscape and views from church.
- Impact on residential amenity through car lights at night using top access road.
- The site would be better used for a new library and communal gardens.
- Highway safety danger through increased use of access onto Broad Street
- Design of apartment blocks out of keeping.
- Concerns over the unrestricted use of and access through the site for members of the public from Franklea Close to Broad Street.
- Impact on the town centre conservation area.
- Loss of outlook for Franklea Close residents.
- Inaccuracies in drawings and in particular relationship between apartment blocks and properties in Franklea Close.
- No requirement for further retail units in the town.

In addition:

2 Letters of qualified support to the principal of redevelopment but opposed to certain aspects of the proposed scheme have been received.

PLANNING POLICIES

Government Guidance

PPS1 – Delivering Sustainable Development
PPS3 – Housing
PPS6 – Planning for Town Centres
PPS7 – Sustainable Development in Rural Areas
PPS9 – Biodiversity and Geological Conservation
PPG14 – Development on Unstable Land
PPG15 – Planning and the Historic Environment
PPG16 – Archaeology and Planning

Devon County Structure Plan (2001-2016)

ST1 (Sustainable Development)
ST4 (Infrastructure Provision)
ST16 (Local Centres and Rural Areas)
CO6 (Quality of New Development)
CO7 (Historic Settlements and Buildings)
CO8 (Archaeology)
CO9 (Biodiversity and Earth Science Diversity)
CO10 (Protection of Nature Conservation Sites and Species)

East Devon Local Plan (1995-2011)

S2 (Built-up Area Boundaries for Area Centres and Local Centres)
S4 (Development Within Built-up Area Boundaries)
D1 (Design and Local Distinctiveness)
D2 (Sustainable Construction)
D3 (Access for Disabled)
D4 (Landscape Requirements)
D5 (Trees on Development Sites)
D7 (Shop Fronts)
EN6 (Wildlife Habitats and Features)
EN8 (Proposals Affecting Sites Which May Potentially be of Archaeological Importance)
EN11 (Preservation and Enhancement of Conservation Areas)
SH1 (Town Centre Shopping Areas)
RE3 (Open Space Provision in New Housing Developments)
TA7 (Adequacy of Road Network and Site Access)

SITE LOCATION AND DESCRIPTION

The former Marist Convent Site is located in the centre of Ottery St Mary and is currently accessed off the south side of Broad Street. This frontage is enclosed by a high level rendered wall with a central vehicular access and a separate pedestrian access at its eastern end. The site boundary then extends to the south taking in the existing forecourt to the building and wrapping around the former convent building (which is excluded from the application) and returning beyond the rear car park to run along the rear boundaries of properties in Tip Hill – separated from these

by a steep drop, with these neighbouring properties at a significantly lower level. The southwest and southeast boundaries, with the properties in Franklea Close are largely formed by an evergreen hedge. The northern end of the southwest boundary though is formed by a criblock retaining wall where the tennis court has been cut into the natural slope of the land. Beyond the tennis court the land falls away again and the remainder of the return boundary to the site frontage is marked by a mixture of hedging with some tree specimens.

The forecourt to the former convent building slopes up relatively gently from the road and has a circular drive around a central grassed island. To the rear the site is much more steeply sloping and aside from the existing car park area and tennis courts (cut into the natural slope) is generally laid to grass with some low level planting and young tree specimens.

The former convent building (excluded from the site) is a predominantly two storey rendered building with a slate roof and has a relatively simple form with pitched roofs and two projecting gables on the front elevation. Although set back from the road, its relatively elevated position and open frontage makes it a prominent building within the conservation area. To the rear of this is the separate 1 ½ storey height building that housed the former hall. Again this is excluded from the site and whilst well screened from public view is a pleasing and attractively proportioned building. The former convent building whilst having a traditional appearance is not listed as being of special architectural and/or historic merit.

The front of the site (including the former convent building) is located within the town centre shopping area and has been designated as primary shopping frontage to either side. This northern end of the site also lies within the town centre conservation area. The rear of the site lies outside of the designated conservation area but is prominent from views within the town and is currently a green space surrounded by residential properties to all sides.

PROPOSED DEVELOPMENT

The proposal seeks to redevelop the site predominantly for residential use with some commercial use on the northeastern site frontage where it adjoins the town centre shopping area. The topography of the site effectively constrains the development potential of the site, with a very steeply sloping section to the rear of the former convent building. The proposals therefore look to develop the site in three distinct elements. On the top (southern) part of the site it is proposed to create an access road off Franklea Close to serve 4 no. 3 bed townhouses. The top end of the site would be linked by means of a footpath to the 2/3 storey apartment block proposed for the northwestern part of the site. This block would provide for 8 no. 2 bed apartments built around the existing level area formed for the existing tennis court. A separate access road would lead around to the front of the former convent building and a new access is proposed onto Broad Street to the southeast of the existing access. The moving of the access would allow for the development of a two storey commercial building on the site frontage. This would continue the line of the existing terrace of two storey properties and would create a retail unit at ground floor level with an office unit above.

CONSIDERATIONS AND ASSESSMENT

Background

The former convent building has now been sold and houses at present the offices of Ottery St Mary Town Council and the local police station.

The proposals put forward seek to redevelop the site with a mixed use development as outlined above. The site is subject to a number of constraints that affect the way in which it might be developed but the main considerations are as follows and as discussed separately below. The principle of the proposed uses; The site layout; The design of the proposals and their impact on the townscape and conservation area; Highway safety and access issues; impact on

amenity/privacy of neighbouring and future occupiers; Open space and education S106 contributions; ecological impact; land stability; sustainability credentials and landscaping.

The principle of the proposed uses

The proposed development can be simply subdivided into 3 distinct elements: The frontage commercial development; the apartment blocks and the town houses.

In the first regard the site frontage lies within a designated town centre shopping area (and primary shopping frontage) where policy seeks to retain existing shopping facilities/related commercial uses. The provision of a new retail unit (with office use above) is seen as policy compliant and a welcome addition to the towns retail offer. No end user is specified for either unit but subject to restricting the ground floor use to A1 and the first floor to either A1, A2 or B1 uses there are no in principle objections.

The residential uses proposed in the form of the apartment blocks and town houses are also considered appropriate in policy terms adjoining established residential development to the south, east and west sides and with direct access to the town centre facilities and public transport links.

Site layout

The proposal site is subject to a number of constraints that affect the way in which it might be suitably redeveloped. Not least of these is the steeply sloping nature of the site to the rear of the convent building. Development is also constrained by existing buildings (including the convent building) immediately bordering the site. It is accepted that there are only two potential access points into the site, from the north off Broad Street and from the south off Franklea Close, both are utilised in the scheme.

The provision of a frontage development in the form of a continuation of the existing terrace of shops is considered appropriate and, subject to highway requirements, provides for a relocated main site entrance to serve the apartment blocks and the existing convent building. In order to provide access to serve the rear of the site a new access road is proposed that sweeps around to the west of the convent building before turning and running parallel to the southwest boundary. The topography of the site would require that this would have a relatively steep incline but one that is within the range acceptable to meet highways requirements. It would appear that there is little alternative to this arrangement to access the higher rear part of the site. The apartment blocks are largely proposed to utilise the existing level area formed by the tennis court. The block is arranged in an L shape with a two storey element parallel to the southwest boundary and at right angles to this a three storey block returning into the centre of the site. This element is considered appropriate in principle and makes good use of the existing levelled section of the site whilst providing for further development cut into the slope of the land.

The natural steep slope of the centre part of the site essentially restricts further development without appearing cramped or essentially altering the open character of the site and the relationship with the convent building.

Running through the centre of the site on an approximate northwest to southeast axis is a pedestrian footpath which would link the townhouses at the top of the site with the rest of the development and the town centre; some additional landscaping is also proposed but essentially this centre part of the site would retain its open character which provides an important green space in the townscape, particularly when viewed from the area around the church to the north.

At the top, most elevated part of the site a short terrace of town houses are proposed running across the site on a southwest-northeast axis. These would be split level (two storeys to the south and three storeys to the north) to take account of the change in levels. The roofline would also be staggered down following the contours of the site and the proposed new access road. This access road would access the site from the south west corner, off an existing spur to

Franklea Close. The site levels would require some excavation of the site close to the access but this would level out approximately half way along the length of the road. The road would run parallel to the southeast boundary and would terminate in a turning head toward the southeast corner of the site.

Overall the layout proposed is considered to be an imaginative and well thought out use of the site. Objections have been raised to specific elements of the proposal scheme as well as to the general issue of the redevelopment of the site, it is considered these are best addressed in relation to each issue below.

The design of the proposals and their impact on the townscape and conservation area

Commercial unit

The proposed commercial unit on the site frontage would act as a continuation of the existing row of buildings that front Broad Street. The building would be of a simple linear nature with an end gable adjacent to the relocated main site entrance. The detailing indicates a traditional timber shop front at ground level with a corner entrance and timber sliding sash windows at first floor level. The materials proposed are render to the elevations and slate to the roof with joinery in timber. To the rear is a projecting two storey gable offshoot with simpler, more modern fenestration treatment but still in timber. Subject to appropriate conditioning of materials and detailed design drawings there are no objections to the design of this building, which should blend in with the traditional streetscene.

This unit does though require the movement of the existing vehicular access to the southeast and would serve to close up the existing open frontage to the site. At present the open site frontage allows views into the site and of the convent building and provides some relief to the streetscape which would be reduced. However, it is considered that sufficient open space would remain to retain the variety that this opening currently affords to the streetscene. Notwithstanding this matter the overall design of the frontage building is considered to be complementary to the streetscene and views into the rest of the site would still be possible from the relocated site entrance.

Apartment Block

The apartment block, located on the site of the former tennis courts in the northwestern part of the site, was originally for an L shaped block of 2/3 storeys with the longer north-south orientated block being of two storeys and the shorter east-west block being three storeys. The highest part was proposed at the southwestern corner of the building which would have comprised of first and second floor apartments over a ground floor storage area and parking and a lift shaft projecting further above this. Following concerns over the impact of this on residential amenity as well as the austerity of the elevation treatment the design of the apartment blocks have been revised.

In footprint terms the building has been shifted in a southerly direction but in terms of scale, massing and height the proposal still proposes a 2/3 storey L shaped block but the overall height of the building has been reduced by over a metre and the three storey element moved away from the western boundary. The elevation treatment has also been altered to give a more domestic appearance to the building. The design concept for the building is clearly contemporary with clean rendered elevations sitting under flat or low mono-pitched roofs. Fenestration is kept predominantly to the north and west elevations facing into the site.

The lower two storey block has, save for a slightly projecting flat roof section at its northern end, a mono-pitched standing seam roof with the north-east elevation punctuated by regular window openings at ground and first floor level. The north-west elevation features external entrance doors and stairs and a first floor roof terrace with glazed balcony. The rear (south-west) elevation which faces the retaining boundary wall has a series of smaller window openings serving bathrooms.

The east-west orientated element of the apartment block has a two storey, flat roofed section in the south-west corner (with parking at ground floor level) before rising to three storeys. The northwest elevation of the three storey section features again rendered elevations with large amounts on full height glazing and some glazed balconies; these sit under an overhanging flat roof. The lift shaft projects from this elevation and terminates above roof level. The northeast elevation is at ground floor level partially cut into the ground to the south side and at ground and first floor levels is punctuated by one horizontal and two vertically emphasized windows on each floor. The second floor features full height glazing and feature timber boarding and an overhanging full length glazed balcony. The south east elevation would be largely obscured by retaining works at ground floor level and above this the theme of simple rendered elevation treatment punctuated by windows with some glazed balconies is continued.

In relation to the design of the apartment blocks and their impact on the conservation area, concerns have been raised. These concerns relate primarily to the scale, height and massing of the apartment blocks and their contemporary design failing to reflect the character and appearance of the area and to preserve or enhance the conservation area of which they are part. The proposed development is clearly of a contemporary design but the use of materials proposed render and grey standing seam roofs (as a modern interpretation of the slate roofs used predominantly in the town) would reflect the use of materials used in the vicinity and help the proposal to identify with its context. The clean simple nature of the design and the use of flat/low pitched roofs also helps to reduce the overall height of the building and prevents the building from trying to compete with the former convent building itself. Whilst it is accepted that the buildings would be visible from certain vantage points in the town and from views into and across the conservation area it is considered that the former convent building would largely screen the bulk of the building. The proposal would be higher than the Marist convent building to its north due to the elevated siting on the existing tennis court but this increased height is minimised through the use of flat roofs and views from the direction of the church to the north would see the top of the building to the rear of the former convent building, with the sense of openness to the centre part of the site retained.

Concerns over the design of the building being out of keeping with the area are acknowledged and it is accepted that the contemporary design and scale of the building is not reflected elsewhere in the town centre but this is not to say that such an approach is invalid. What needs to be considered is the resulting impact on the conservation area of the proposal. The character of, at least this part of the conservation area, is considered to be related to the sense of openness and green space within the townscape. As discussed the design has attempted to minimise the height of the building through utilising a flat roof design and by containing development to largely the southern and western boundaries of the site the sense of green open space in the centre of the site is retained. In this respect it is considered that the proposal preserves the character of the conservation area.

Town Houses

The proposed terrace of four town houses run across the southern (highest point of the site) and generally follow the existing contours stepping down from east to west along the terrace. The houses are cut into the hillside creating split level properties with three storeys on the northern side and two on the southern side, such that the first floor is level with the adjoining access road.

The terrace is also staggered such that the two end properties project slightly forward of the two middle properties (more so with the property at the western end of the row). This adds some further variation to the roofscape.

They are designed with steeply sloping full width gables to the south elevation and narrower projecting gables to the north side. Materials used are generally render under slate roofs with some timber cladding to the recessed parts of the north elevation. In general the fenestration is kept relatively simple apart from large openings at first floor level on the north elevation and second floor level on the south elevation. There is also high level glazing to the gables on the north elevation to serve the sitting rooms.

Overall the design of the properties is considered to be well conceived and the materials and rhythm created by the variation in ridge line reflects those seen in the town. The overall height of the buildings is taller than that of surrounding properties but the impact of this is reduced through cutting in the ground floor into the natural slope of the land. From distant views across the town centre from the north the proposals would result in a reduction of the existing green space seen to the rear of the convent and this has been a matter of objection for a number of residents. In this regards it is accepted that the area of green space is an important contribution to the townscape. However in attempting to balance the need to make the most efficient use of land and to retain this sense of openness it is considered that the proposal achieves this and that a sense of the existing openness of the middle part of the site would remain with sufficient space retained around the convent building to preserve its setting.

Highway safety and access issues

The proposal would be served by two accesses. The principal access to serve the former convent, the commercial unit and the apartment blocks would see the realignment and upgrading of the existing access onto Broad Street. This would see the existing access closed off and a new access formed further to the east with a 2 metre footway provided across the site frontage. The visibility splays provided are indicated to be 33 metres in each direction (from a point 2.4 metres back from the carriageway edge). This access would lead into the front part of the site where a highways standard turning head is proposed (suitable to provide access and on-site turning for emergency vehicles). A total of eight parking spaces (including one disabled space) are proposed in this area forward of the convent building. These would provide 3 no. parking spaces for the commercial unit, with the rest to serve the convents new users.

The access road then turns around to the west side of the convent building and follows the boundary, turning again to return parallel with the western boundary to serve the apartment block. In the northwest corner of the site a new electricity sub-station is proposed to serve the development. The steep change in levels on the site requires this rather circuitous route to avoid overly steep gradients to the access road. One parking space is allocated to each of the apartments, four of these are provided by garages at ground floor level in the apartment block with the remaining four spaces on the east side of the access road. The apartments are also provided with a communal cycle store proposed for an area to the north west of the convent building.

The town houses at the top end of the site are served by a new access road taken off the spur to Franklea Close. The access would be formed in the southwestern corner of the site and would slope down and turn to run parallel with the southern boundary. This road would terminate in a turning head at the eastern side of the site, with protection from run-away vehicles afforded by a vehicle barrier.

Several areas of concern have been raised in relation to access and parking arrangements. Firstly there has been widespread concern from Franklea Close and other residents in relation to the increased traffic using Franklea Close and the junction between Winters Lane (which Franklea Close runs onto) with Tip Hill. It is acknowledged that the junction of Winters Lane with Tip Hill affords limited visibility particularly in a northerly direction but the relative increase in traffic using this junction is not considered to be significant enough to warrant objection and none has been received from the Highways Authority. Furthermore, there are concerns over the introduction of the Franklea Close access both in terms of highway safety and impact on existing on-street parking due to insufficient on-site parking provision. In the first respect the proposed access would meet the required visibility requirements for an access of this nature and again the highways authority has raised no objection. Regarding adequacy of parking provision, policy TA9 of the Local Plan sets maximum standards (with which the proposal accords) but there are no minimum parking standards that can be applied to the development. It also needs to be recognised that the proposal site is in a highly sustainable location close to the town centre and with access to a range of services and public transport provision.

Similar although fewer concerns have been raised in relation to the access on the site frontage onto Broad Street but again these objections are not shared by the highway authority and refusal on such grounds could not be substantiated. Finally there has also been concern over the access to the site for larger construction vehicles. It is recognised that this will need to be carefully considered and will together, with other aspects of the construction phase, have an effect on local residents but again this is not a material planning consideration that would warrant refusal of the objection.

On this matter it is considered that subject to the development proceeding in accordance with the submitted plans and the access and parking facilities being made available prior to the initial use of any part of the development that there are no highway reasons to withhold permission.

Impact on amenity/privacy of neighbouring and future occupiers

The proposed development site is bordered to its south east and west sides by adjoining residential properties. The difference in levels between the proposal site and these properties also affects the degree to which they could be affected and indeed the degree to which the various elements of the proposal interrelate. Potential impacts that need consideration are: general amenity issues; loss of privacy/overlooking and loss of outlook or overbearing impact as previously discussed the general impact of the construction phase itself is an accepted part of any development and is not a reason in itself to oppose development. The issues relating to land stability are separately discussed later in the report.

To the east side of the site, the properties in Tip Hill are generally set far enough away from the apartment blocks such that they would not be significantly affected. Those further to the south are set at a significantly lower level than the town houses such that their ridge heights are comparable with the proposed ground floor level of the town houses. The town houses would also be run at right angles to these properties and therefore the combination of the significant difference in levels and the orientation of the properties leads to the consideration that these properties would not be significantly affected. However, there is a need to ensure that suitable and adequate landscaping is provided to this eastern boundary to protect the adjoining residents from overlooking through the use of the communal amenity space. On this point it is noted that a number of residents in Tip Hill have raised concern about the potential public use of this area and views from the boundary into their rear gardens. Although there is no physical barrier to public access proposed, the communal garden areas and footpath link between the upper and lower parts of the site are designed as communal amenity spaces for the residents only and not for use by the general public. The footpath is set well into the site and planting is proposed around the communal seating area to help screen views toward the east. It will also be necessary to provide some form of fencing along the eastern boundary both for protective and safety measures and this can be included as part of a landscaping scheme controlled by condition.

To the south side the development would back onto Franklea Close and would be set a level below that of the cul-de-sac. At present there is a high level coniferous hedgerow that separate the site from this side and this appears to be indicated as remaining. There are no properties set on the north side of this spur to Franklea Close and only one property adjoins this southern boundary (No. 9). The northern boundary of No. 9 is effectively contiguous with the southern boundary of the site for most of its length, although the dwelling itself is side on to this boundary. Due to the variation in levels between the site and this neighbour and the distance between them it is not considered that the proposal would result in any significant levels of overlooking of this property, particularly if the existing hedge were to be retained. There is likely to be some impact on the amenity of No.9 due to the impact of traffic using this new access road but given the differences in levels and the existence of the high hedge line this is not considered to be significant enough to warrant refusal.

The terrace of town houses at the top end of the site have the potential to impact on the occupiers of Franklea Close either through their physical proximity or views from windows/balconies on their north and south facing elevations. The most westerly of these

buildings at its closest point would be set 7 metres of the boundary with Nos. 14 and 15 Franklea Close with the highest point of the gable end of the building being approximately 8 metres from the boundary and 10 metres above existing ground level. The rear elevations on nos. 14 and 15 Franklea Close are set approximately 11 metres from their respective rear boundaries. This would give an overall separation distance of approximately 19 metres to the highest part of the proposed townhouses. Whilst the townhouses would clearly be visible and prominent at this distance and views across the site would be affected it is not considered that the outlook of neighbouring occupiers would be significantly affected, particularly as the roofs of the townhouses would slope away from these properties and the orientation of the proposed townhouses are to the north and east. There are no windows proposed in the elevations viewing towards these adjoining properties and the north facing terraces at first floor level on the rear elevations of the town houses are angled away from this boundary. The projecting terraces, previously proposed, on the front (south facing) elevations of the terrace have now been removed and this has reduced the potential impact on the amenity of neighbouring occupiers to an acceptable degree.

In relation to the proposed apartment blocks the concerns regarding impact on residential amenity are related primarily to impact or loss of outlook. There are also concerns in relation to stability of the retaining structure on the western boundary but these are discussed separately.

The amendments to the design of the apartment blocks has seen the three storey element moved away from the north-west boundary with the rear gardens of nos. 17, 18 and 19 Franklea Close. The apartment blocks are now shown to lie predominantly below the line of fencing that sits on top of the existing retaining wall with the taller three storey element of the build positioned a minimum 12 metres from the boundary with all, save the lift shaft, set at a height just above the internal ground floor level of no.18 (the property most directly affected). It should be noted that the site levels and in particular the comparative difference in levels between the existing tennis court (where the apartments would be built) and no.18 has been disputed with agents acting for the occupiers of no.18 claiming that the represented height of no.18 above tennis court level is inaccurate with no.18 actually being 1.1 metres lower than portrayed. Nonetheless, it does not appear that the height of the existing retaining structure is disputed (although the height of the fence above this appears to be exaggerated with the actual existing fence height being 1.6 metres). The applicant's agents have been asked to verify the accuracy of the drawings and are content that these are true representation of the situation. It is also apparent that were the objectors agent to be correct in his claim of inaccuracy that the vast majority of the proposed building would still sit below the fence level of no.18 and the properties to either side. Whilst it is accepted that the proposal would affect the current views enjoyed from some properties in Franklea Close, over the former convent grounds towards the church, the amendments to the application are considered to have adequately addressed the issue of loss of outlook and overbearing impact.

Mutual overlooking between the townhouses on the southern, elevated part of the site and the apartment blocks on the existing tennis court would be possible. The closest point between the two buildings would be approximately 12 metres and there are windows and balconies on the southeast elevation of the apartment building that would be open to views from windows/balconies on the rear (northwest) elevation of the townhouses. Whilst the distance between the buildings is less than would normally be considered appropriate in terms of intervisibility the difference in levels is significant and such that there are no significant concerns in this respect.

Open space and education S106 contributions

The section 106 contributions that are sought for the scheme amount to a total of £95,695.88. This figure comprises of £32,570.18 for contributions towards open space contributions and £63,125.70 for contributions towards education infrastructure sought by Devon County Council – The breakdown for these contributions is outlined above, under Devon County Council comments.

The applicants have not submitted a unilateral undertaking or Section 106 legal agreement to cover these costs but have instead commissioned a viability report relating to the development costs of the site. The conclusions of the viability report are that the development costs of the site together with associated acquisition costs and professional fees would result in a development profit of £26,262 representing a 0.84% return on Gross Development Value. The report suggests that this figure falls considerably short of the accepted market level of 15-20% return on Gross Development Value.

The applicants are therefore claiming that the provision of the required section 106 contributions would make the site unviable to develop out and even without these contributions profit levels on the development would be exceptionally low.

Recent appeal decisions and government advice recognise that the current economic climate needs to be taken into account in reaching decisions on amounts and levels of contribution required and for this to be on a site specific basis. In this case the applicant has demonstrated through the viability report that the proposed development would not be viable with the required contributions and would even without these produce a profit well below accepted market levels. The developers therefore have the option to build out the site for a minimal profit or sit on the site until the economic climate is more favourable. In this situation it is considered that to insist on the contribution normally required would be unreasonable and would result in the site remaining undeveloped. There is also the likelihood that an inspector at appeal would take a different view and consider the boost to the local economy that the development of the site would provide in the current climate as sufficient. On balance therefore it is considered that the nil contributions be accepted in this instance but the option is open to members to impose a reduced time limit for commencement of development if it is considered this is justified in relation to viability and in order to encourage the development to be brought forward at the earliest opportunity. However a reduced time limit may result in a partial start on site to implement the permission and then the site being mothballed until a later date

Ecological impact

An extended phase 1 habitat survey was carried out in May of this year to assess the potential for the site to provide habitats for protected species. This report concluded that the site had the potential to support badgers, bats, hedgehogs, and a number of reptiles and invertebrate species. The report also recommended that further surveys be carried out. Natural England responded to the initial report raising objection until the recommended further surveys had been carried out and any appropriate mitigation works proposed.

A further protected species survey has since been carried out in July/August 2009 and this has been forwarded to Natural England who have subsequently lifted their initial objection. The protected species report findings indicated a single entrance badger sett in the southwest boundary of the site with No. 17 Franklea Close and a further significant badger sett on land to the rear of 21 Franklea Close (off-site). No indications of bat roosts were found but slow worms were found to be present on the site. The conclusions and recommendations of the report suggest that a disturbance or interference licence may be required from Natural England in relation to badgers and proposes mitigation measures for slow worms by relocating these to a fenced receptor area for the duration of development.

Landscaping

The general proposals for landscaping seek to retain the open character of the centre part of the site which is indicated to be retained for communal amenity areas for residents. The scheme has also been amended to ensure the retention of the mature oak to the north of the proposed tennis court apartments. The existing hedge planting on the southeastern and southwestern boundaries is also indicated for retention. Elsewhere within the site areas of new tree planting are proposed but essentially the proposal seeks to retain the open and undomesticated character of the site. This general approach is considered to be appropriate but a full landscaping scheme and

management plan would be required to include species, numbers and positioning of plants, hardsurfacing materials and fencing, walls or other means of enclosure.

Land stability and surface water run-off

Concerns have been raised in relation to the stability of the site and its ability to safely accommodate the development. In particular the eastern boundary with Tip Hill where the land falls steeply away – to a sheer vertical face at the southern end – has been highlighted, as has the stability of the existing crib-lock retaining structure to the northwest boundary adjacent to the existing tennis courts. In acknowledgement of these matters the applicant's have commissioned a geotechnical survey to assess slope stability, geotechnical conditions for foundations, soakage potential and general ground conditions. This report makes a number of recommendations as to how the foundations of the buildings should be constructed what re-profiling might be required and how the stability of the slope on the eastern/southeastern boundary with Tip Hill can be managed. The report also suggests that the use of soakways are likely to prove unviable for the control of surface water run-off.

It is noted that the occupier of No. 14 Tip Hill has recognised the works carried out but has stated that he is not willing to give access to his site to carry out the suggested works without further details of the proposals. This is essentially a matter between the two parties. What needs to be considered from a planning point of view is whether the surveys carried out are sufficient to demonstrate that the development could proceed having taken into account the potential issues of stability. In this case the applicant has commissioned a specialist report to consider the issues involved and accordingly taken these into account in the amended plans (including illustrating the land take required to stabilise the bank). Whilst the report highlights the need to carry out further investigative work in relation to ground conditions to determine the appropriate design for foundations it does not highlight any particular concerns or reasons to suggest that the development could not or should not proceed. It is considered that this is sufficient to determine that planning permission can be granted in accordance with the advise set out in PPG 14. However, it will be necessary to condition further details of any soil re-profiling or earthworks required and further details of the method and finished treatment of the bank adjacent to No.14 Tip Hill. The foundation design for the buildings is a matter that should be properly controlled under the Building Regulations.

With regard to surface water run-off an appendix to the report proposes a SUDS system and the need to build attenuation tanks in order to reduce surface water run-off from the site to acceptable rates. Initial investigations suggest this can be achieved with potentially a primary tank situated below the entrance access way onto Broad Street. Further details of this would be required by condition prior to the commencement of any development. The size and location of the site are such that the Environment Agency are not required to be consulted. However, informal discussions with the Environment Agency suggest that the proposed solution is acceptable subject to a detailed scheme being conditioned as part of any approval.

Other issues

In terms of sustainability the site is well located in relation to the town centre and the services and public transport opportunities available there. The submitted Design and Access Statement states that the dwellings would be rated at least 'very good' under the Code for Sustainable Homes, but does not elaborate on what specific measures would be employed to attain this rating.

CONCLUSIONS

The proposal looks to redevelop the grounds of the former convent building to provide 12 no. residential units and the site frontage to provide 1 no. commercial unit. It is acknowledged that the site plays an important role in the existing townscape and in particular the views from land around the church to the north of the site are important. The proposals seek to retain the existing

sense of openness to the rear of the former convent building as far as reasonably possible and to this end development is limited to the southwest and southeast boundaries. Concerns related to: site layout; design; impact on the conservation area; Highway safety and access issues; impact on amenity/privacy of neighbouring and future occupiers; ecological impact and land stability have been addressed in the body of the report and it is considered that the proposals are acceptable in this respect.

In terms of open space and education contributions the proposal is lacking with the commissioned study suggesting that such contributions would make the scheme unviable. Given the prime location of the site in relation to the town centre and existing concerns regarding the current amount of development and the further costs likely to be incurred in developing the site (in line with the recommendations of the geotechnical survey) it is considered that in order to provide such contributions the density of development would need to be considerably increased. If this were possible, given the gradient of the site, it is considered that this would require further development of the central open area of the site to the significant detriment of the character of the area. It is therefore recommended that on balance and given the current economic climate that the contributions that would normally be required be set aside and that the development be approved, but on the understanding that the applicant enters into a legal agreement to bring the development forward as soon as possible and that a re-evaluation exercise is undertaken if the development does not come forward in the short term. This re-evaluation exercise is in line with advice from elsewhere that schemes should be re-assessed for viability over a longer period to allow the planning authority to recoup some of the contributions.

Members will be aware of other similar requests from developers to relax s106 requirements on contributions before reaching a conclusion. It is important that the authority operates a consistent policy unless there are extenuating circumstances which would warrant setting aside any contributions.

RECOMMENDATION

Subject to the applicant entering into a Section 106 Agreement to allow the Council to re-evaluate viability on an annual basis in relation to a meaningful commencement of development,

APPROVE 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. Development shall be carried out in accordance with the findings and recommendations of the submitted Geotechnical Investigation report, prepared by Clarke Bond South West and Wales Ltd. and dated July 2009. Any additional remediation measures required to secure the stability of the site which result from the further investigations required shall first be submitted to and agreed in writing by the Local Planning Authority. Development shall then proceed in accordance with any details as may be agreed.
(Reason – To ensure that the development of the site takes full account of land stability issues in the interests of public safety)
3. No development shall take place until a landscaping scheme and management plan has been submitted to and approved in writing by the Local Planning Authority; such a scheme to include:
 - the planting of trees, hedges, shrubs (identifying species, size, number/ratio and layout)
 - details of any earthworks including the grading and mounding of land areas showing the levels and contours to be formed and the relationship of such works to surrounding land form and where appropriate adjoining properties

- Details of all areas of hard-surfacing, including internal roads and tracks, car parks and lay-by areas.

The scheme shall also give details of any proposed walls (including retaining walls or structures), fences and other boundary treatment. The landscaping scheme shall be carried out in accordance with a phasing and management plan to be submitted to and agreed in writing by the Local Planning Authority and unless otherwise agreed 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 - In the interests of amenity and to preserve and enhance the character and appearance of the area.)

4. Prior to commencement of any works on site (including demolition), tree protection details, to include the protection of hedges and shrubs, shall be submitted to and approved in writing by the Planning Authority. These shall adhere to the principles embodied in BS 5837 and shall indicate exactly how and when the trees will be protected during the site works. Provision shall also be made for supervision of tree protection by a suitably qualified and experienced arboricultural consultant and details shall be included within the tree protection statement. The development shall be carried out strictly in accordance with the agreed details.

In any event, the following restrictions shall be strictly observed:

(a) No burning shall take place in a position where flames could extend to within 5m of any part of any tree to be retained.

(b) No trenches for services or foul/surface water drainage shall be dug within the crown spreads of any retained trees (or within half the height of the trees, whichever is the greater) unless agreed in writing by the Local Planning Authority. All such installations shall be in accordance with the advice given in National Joint Utilities Group (NJUG) Publication Number 10 1995.

(c) No changes in ground levels or excavations shall take place within the crown spreads of retained trees (or within half the height of the trees, whichever is the greater) unless agreed in writing by the Local Planning Authority.

(Reason - To ensure retention and protection of trees on the site in the interests of amenity and to preserve and enhance the character and appearance of the area.)

5. No development shall commence until the further detailed drawings of the following design elements have been submitted to and approved in writing by the Local Planning Authority:

- Full elevation drawings at a scale of 1:50 of the proposed cycle storage and electricity sub-station buildings/structures. Roofing materials including product details, sample and method of fixing.

- Cross-section details at 1:2/1:5 scale through all joinery on the shop front unit and the sash windows serving the commercial unit above Eaves and verge details including construction and finishes.

Development shall be carried out in accordance with the approved details.

(Reason – To ensure such details are appropriate in the interests of the preservation and enhancement of the surrounding conservation area)

6. No development shall commence until a fully detailed SUDS (Sustainable Urban Drainage System) scheme detailing how all surface water run-off associated with the development of the site will be appropriately controlled and managed has been submitted

to and approved in writing by the Local Planning Authority. Once agreed any such scheme shall be constructed and fully operational prior to the initial occupation of any of the buildings hereby approved and maintained thereafter.

(Reason – To ensure that surface water is properly controlled in the interests of flood prevention and highway safety)

7. No development shall take place until samples of the materials to be used in the construction of the external surfaces of the buildings and areas of hardsurfacing hereby permitted have been submitted to and approved in writing by the Local Planning Authority, such details/samples shall include:

- A panel of all proposed render finishes
- roofing slates (for commercial unit and townhouses)
- timber cladding
- brick (for the chimney stack on the commercial unit)
- roofing materials including fascia and coping detail for the apartment blocks
- rainwater goods (for all buildings)
- hardsurfacing materials for all carriageways, footways, parking areas and other areas of hardsurfacing

Development shall be carried out in accordance with the approved details.

(Reason - To ensure that the materials are sympathetic to the character and appearance of the area.)

8. The Use of the commercial building on the Broad Street site frontage shall be restricted to A1 uses at ground floor level and B1 uses at first floor level.

(Reason – In order to define the permission and in the interests of maintaining the vitality and viability of the town centre)

9. Visibility splays shall be provided, laid out and maintained for that purpose at the site access in accordance with the attached diagram 1027-P09 where the visibility splays provide intervisibility between any points on the X and Y axes at a height of 0.6 metres above the adjacent carriageway level.

(Reason - To provide adequate visibility from and of emerging vehicles.)

10. No part of the development hereby approved shall be brought into its intended use until the access, parking facilities, visibility splays, turning area, parking space and garage/hardstanding, access drive and access drainage have been provided and maintained in accordance with details that shall have been submitted to, and approved in writing by, the Local Planning Authority and retained for that purpose at all times

(Reason - To ensure that adequate facilities are available for the traffic attracted to the site)

11. This permission shall relate to the amended drawing No. 1027-P01 Revision D and 1027-P09 received by the Local Planning Authority.

(Reason - For the avoidance of doubt)

12. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(Amendment) (No.2) (England) Order 2008 as amended (or any order revoking and re-enacting that Order with or without modification) no windows, doors, rooflights or other openings other than those shown on the approved plans shall be formed in any elevation of the dwellings hereby permitted.

(Reason - To protect the privacy of adjoining occupiers.)

13. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development)(Amendment) (No.2) (England) Order 2008 as amended (or any order revoking and re-enacting that Order with or without modification) no works within Classes

B or c of Part 1 of the Schedule shall be undertaken without the prior written approval of the Local Planning Authority.

(Reason – In the interests of the character and appearance of the area and residential amenity)

14. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 as amended (or any order revoking and re-enacting that Order with or without modification) no works within Schedule 2, Part 2, Class A for the erection of any gate, fence wall or other means of enclosure, other than those agreed as part of any landscaping scheme to this application, shall be erected without the prior written approval of the Local Planning Authority.

(Reason – In the interests of the character and appearance of the area.)

15. Hours of construction work shall be limited to 08.00 - 18.00 Monday to Friday, 08.00 - 13.00 on Saturdays with no work on Sundays or Bank Holidays.

(Reason - in the interests of residential amenity)

Informatives

- The applicant is advised that in accordance with the advice set out in Planning Policy Guidance Note 14: Development of Unstable Land the responsibility and subsequent liability for safe development and secure occupancy of the site rests with the developer and/or landowner. Whilst the local planning authority had used its best endeavours to determine the application on the basis of the information available to it, this does not mean that the land is free from instability. Consideration has been on the basis of the development proposed and that these considerations might be different in relation to any other development. The question of stability has been a material planning consideration and resolution of this issue does not necessarily imply that the requirements of any other controlling authority would be satisfied; in particular, the granting of planning permission does not give a warranty of support or stability.
- The applicant is advised that the granting of planning permission does not absolve them from complying with the relevant law, including obtaining and complying with the terms and conditions of any licences described in Part IV B of Circular 06/2005

Reasons for approval

1. The proposal complies with the Devon Structure Plan 2001-2016 Policy C06 and C07
2. The proposal complies with the adopted East Devon Local Plan 1995-2011 Policies S4, D1, D5, D7, EN6, EN8, EN11, SH1 and TA7
3. The proposal does not affect the privacy or amenity of neighbouring properties.
4. The design and external appearance of the proposal does not harm the visual amenity of the site and surrounding area.
5. The proposal does not harm the character and appearance of the conservation area.
6. The proposal does not harm or give rise to a perceived threat from important trees on or adjacent to the site.

7. The proposal is contained within the defined built-up area boundary of the settlement.
8. The access to serve the proposal does not prejudice highway safety.
9. The density of the development is at the highest level possible compatible with the area.

Approved plans

CN04: Site Location Plan, 1027-P01 rev D, 1027-P08 rev B, 1027-P07 rev B, 1027-P03 rev D, 1027-P04 rev D, 1027-P02 rev C, 1027-P06 rev A, 1027-P05 rev B, 1027-P10

List of Background Papers

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