

## **PLANNING AND BUILDING (JERSEY) LAW 2002**

### **Appeal under Article 108 against a decision made under Article 19 to refuse planning permission**

#### **REPORT TO THE MINISTER FOR THE ENVIRONMENT**

made under Article 115(5)  
by D A Hainsworth LL.B(Hons) FRSA Solicitor  
the inspector nominated under Article 113(2) from the list of persons appointed  
under Article 107

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#### **Appellants:**

SAM Developments (Jersey) Ltd

#### **Application reference number and date:**

P/2023/0635 dated 24 July 2023

#### **Decision Notice date:**

14 March 2024

#### **Site address:**

Land parcel at the rear of Royal Bank Court, College Hill, St. Helier JE2 4RX

#### **Proposed development:**

"Excavate ground level to construct 4No. two-bedroom apartments, 1No. one-bedroom apartments. Construct retaining granite wall and new vehicular access onto College Hill."

#### **Inspector's site visit date:**

28 May 2024

#### **Hearing date:**

30 May 2024

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#### **Introduction**

1. This is an appeal against the Planning Committee's decision to refuse planning permission for the proposed development. The Committee had been recommended by the Infrastructure and Environment Department to approve the application, subject to a financial contribution being made towards the Eastern Cycle Route Network and to planning conditions being imposed in relation to energy efficiency, landscaping, species protection, waste management, percentage for art contribution and additional details concerning the proposed parking, access and drainage arrangements.

2. The reasons given for the refusal of planning permission are: -

- “1. The development, by reason of its height, would unreasonably harm the amenities of a neighbouring property (Royal Bank Court) through a sense of overbearing enclosure. This is contrary to policy GD1 of the Adopted Bridging Island Plan 2022.
2. The development, by reason of its height, would be inappropriate in scale and would be harmful to the Green Backdrop Zone as a result. This is contrary to policies GD8 and H1 of the Adopted Bridging Island Plan 2022.
3. The development, by reason of the number of residential units proposed, would be of an unacceptable housing density relative to the site context and area. This density would result in the overdevelopment of the site, which would be harmful to the nature of the site itself as well as its local context. This is contrary to policy H2 of the Adopted Bridging Island Plan 2022.
4. The development, by reason of the increase in excavation proposed to be undertaken, would result in the generation of significant quantities of waste material, which would require transportation off-site, contrary to the aspirations of the waste hierarchy. This is contrary to policy WER1 of the Adopted Bridging Island Plan 2022.”

**The site and its surroundings**

3. The site is towards the lower part of College Hill, which is a narrow one-way street with a footway here on the eastern side. It is on the outside of the bend in the street that takes traffic further downwards towards the town centre. A 20mph speed limit is in force. The site rises steeply from west to east and also rises alongside College Hill from south to north.
4. The site is in the built-up area of St Helier for planning policy purposes. The Royal Bank Court apartments are on higher ground above the site to the east. There are dwellings nearby towards the north and south. Victoria College is on the opposite side of College Hill. A stepped footpath within the southern boundary of the site gives access from College Hill to the upper part of the site and to the apartments and other property.

**Details of (a) the approved development of the site, (b) the present planning policies and (c) the development now proposed**

*The approved development of the site*

5. On 18 November 2021 planning permission P/2020/1072 was granted, authorising the construction of a single (239m<sup>2</sup>) four-bedroom house on the site, with a granite retaining wall and a new vehicular access on College Hill. Planning conditions were imposed relating to species protection, landscaping, approval of external materials, a waste management strategy, drainage works, re-use of granite, electric car and bicycle charging facilities, car and bicycle parking and a vehicle turntable. The decision notice records that the permission was granted having taken into account the relevant policies of the Island Plan [Revised 2011 version], together with other relevant policies and

material considerations, including the consultations and representations received.

6. The permission's pre-commencement conditions have been complied with and the approved development has commenced. Extensive excavation works have been carried out pursuant to the permission to enable construction of the house to be started. Further works have been paused pending the outcome of this appeal, which is based on present planning policies. The permission is extant and constitutes a fallback position that can be proceeded with if the appeal is dismissed.

#### *The present planning policies*

7. The permission P/2020/1072 took into account the policies in the Revised 2011 Island Plan, which has now been superseded by the 2022 Bridging Island Plan. The Bridging Island Plan seeks to optimise the density of development, particularly in St Helier where there is an recognised shortfall in the provision of homes sufficient to meet housing needs.
8. This focus on St Helier is manifested in the Bridging Island Plan's strategic policies and in its place-making policies and housing policies. Supplementary Planning Guidance (SPG) was adopted in 2023 to provide assistance with the interpretation and application of these policies. The SPG *St Helier design guidance* states that it should be used to assess all development in St Helier covered by the SPG (this includes the appeal site); it contains advice about tall buildings. The SPG *Density Standards* establishes minimum density standards in built-up areas for development of five or more homes. It adds that in all cases the impact of new development upon neighbouring residential amenity will remain an important consideration. The SPG *Residential space standards* provides guidance to assist with the consistent application and interpretation of Policy H1 (Housing quality and design); it encourages residential development at a higher density in built-up areas provided it achieves minimum space standards.

#### *The development now proposed*

9. The proposed development would provide four two-bedroom apartments (two on the ground floor and two on the first floor) and one single-bedroom apartment in the roof space of the pitched roof. Private outdoor amenity and communal garden areas would be provided. The basement would provide parking space for five cars and eleven bicycles and bin and residential storage space. A private lay-by would be constructed within the site's College Hill frontage. A granite retaining wall adjoining College Hill would be erected. The footpath from College Hill within the southern boundary of the site would be upgraded.
10. The form and elevations of the proposed development would resemble the approved development, with some additions being made to accommodate the change to apartments. As before, the building would be positioned towards the western side of the site, adjacent to College Hill. The height of the roof would be increased by about 1.3m, dormer windows would be inserted in the western (front) roof plane and rooflights would be incorporated in the eastern (rear) roof plane. Most of the excavation work required for the proposed development has already been carried out in connection with the approved development.

## **Main issues, representations and conclusions**

11. Thirty-one public representations were received at the application stage, eighteen of which were objections to the proposed development and thirteen of which were in support of it. Several of the objectors have reinforced their representations in writing at the appeal stage and some spoke at the hearing. The Royal Bank Court Association Committee were represented at the hearing as objectors.
12. I have identified five main issues of concern relating to the proposed development. My consideration of these issues and the representations received in connection with them and my conclusions on each issue are set out in paragraphs 13 to 42 below.

### *The effect of the proposed development on the amenities of the occupiers of Royal Bank Court*

13. The decision notice refers to the amenities of the residents of Royal Bank Court being unreasonably harmed “through a sense of overbearing enclosure”, contrary to Policy GD1 (Managing the health and wellbeing impact of new development). The residents maintain that the scale and height of the proposed development would be overbearing and that they would experience noise and a loss of privacy and light.
14. The applicable provisions Policy GD1 are as follows: -
  - “All development proposals must be considered in relation to their potential health, wellbeing and wider amenity impacts, and will only be supported where:
    1. the development will not unreasonably harm the amenities of occupants and neighbouring uses, including those of nearby residents, and in particular, will not:
      - a. create a sense of overbearing or oppressive enclosure;
      - b. unreasonably affect the level of privacy to buildings and land that owners and occupiers might expect to enjoy;
      - c. unreasonably affect the level of sunlight and daylight to buildings and land that owners and occupiers might expect to enjoy;
      - d. adversely affect the health, safety and environment of users of buildings and land by virtue of ... noise ....”
15. The proposed development would be well separated from neighbouring properties to the north, south and west. The main concern is the impact on the Royal Bank Court apartments to the east and in particular the occupiers of those apartments that face the site.
16. The Royal Bank Court apartments have the advantage of being on higher ground and would also be separated from the proposed apartments by their own gardens and by the communal garden area to be provided by the appellants within the site. Existing vegetation on the boundary would be reinforced by new landscaping within the site. The distance between the

nearest part of the Royal Bank Court apartments and the nearest part of the proposed apartments would be about 15m, corner to corner, with the distance widening substantially thereafter because of the angle of the buildings. This is an acceptable distance in the built-up area of St Helier and typical of existing spacing in this area. It has already been accepted when the approved development was considered under similar policies in the Revised 2011 Island Plan.

17. The 1.3m increase in the roof height of the development would not be a conspicuous change, with the highest part of the pitched roof being some 22m away from the Royal Bank Court apartments' boundary at its nearest point, and about 30m away from the apartments themselves and only about 3.5m higher than the ground level of the apartments.
18. I do not consider that the residents of Royal Bank Court would experience a significant loss of daylight, sunlight or outlook in the circumstances described or be affected by the creation of a sense of overbearing or oppressive enclosure.
19. The three rooflights in the roof plane facing towards Royal Bank Court would be set at a height above floor level that would protect views of Royal Bank Court from them and one of them would be over a stairwell, another over a bathroom and the third above kitchen units. In any event, the distance between the rooflights and Royal Bank Court is such that the level of privacy that residents of Royal Bank Court might expect to enjoy would not be unreasonably affected by the rooflights. The other windows and terraces on the elevation facing Royal Bank Court would be at a lower level, where views towards Royal Bank Court would be screened by rising ground and boundary features.
20. The change from the approved development as a single dwelling to a development of five apartments would result in additional activity in and around the site, some of which could be noticeable to the residents of Royal Bank Court. However, the site is in a built-up area where development and redevelopment at higher densities can be expected and has already taken place, and is supported in principle by present planning policies. There is always the potential for neighbours to experience some loss of amenity in these circumstances. However, I do not consider that amenities would be unreasonably harmed in this instance.
21. Nearby residents have already experienced disturbance from the works that have taken place in connection with the approved development. It is normal now for planning conditions to be imposed in relation to such matters and the appellants have already submitted a detailed Construction and Environmental Management Plan relating to the proposed development, which covers noise and vibration, dust, vehicle movements and public liaison, and includes hours of operation. This would be a working document forming part of the overall management systems to be put in place during the construction of the proposed development and its implementation could be required by a planning condition.
22. For the above reasons, I have come to the conclusion that Policy GD1 would be complied with.

*The density of the proposed development*

23. The decision notice states that the number of residential units would be an unacceptable housing density relative to the site context and area, harmful to the nature of the site and its local context and contrary to Policy H2. The standpoint in general of the objectors is that they would have preferred the site to have remained as the garden area it was before the former hotel was converted into the Royal Bank Court apartments but, if it is to be built on, the approved development is preferable since the proposed apartments would be out of keeping with their surroundings.

24. Policy H2 deals with housing density and is as follows: -

“A positive design-led approach for the provision of new homes will be encouraged at all sites in the island’s built-up area to ensure optimum efficiency in the use of land.

Residential development will be supported where it meets or exceeds the adopted minimum residential density standards established for the island’s built-up areas.

The appropriate density for any individual site will be informed by:

- the quality of design, relative to the nature of the site and its local context, and the character, capacity and sensitivity of the area to accommodate the development;
- the quality, type and mix of homes being created; and its contribution to the creation of sustainable communities; and
- the level of accessibility by walking, cycling and public transport, to a range of services and facilities, including the capacity of existing local infrastructure to accommodate the development; and
- the quantity and quality of amenity space and parking, including visitor parking.

Residential development below the minimum density will only be supported where it is essential to protect the special interest and character of the area, or where there is an overriding justification to provide a particular mix and type of homes.

Proposals involving five or more homes should be supported by a schedule of accommodation and density statement: proposals that are not accompanied by this information will not be supported.”

25. The site’s surroundings include the existing apartments at Royal Bank Court, other dwellings and education premises. The site has very good accessibility on foot to the town centre and to a wide range of services and facilities.

26. The Strategic Housing and Regeneration Team have indicated that the approved development falls considerably below the current minimum density standard for residential development in the built-up area of St Helier, whereas the proposed development would comply with the standard. They maintain that the proposed development would be a more efficient use of land in a

sustainable location and that it would provide quality homes which would be more affordable. They state that it would be an appropriate type and mix of homes having regard to current housing needs.

27. The appellants have submitted a detailed schedule of accommodation and density statement, covering unit sizes, bedroom sizes, storage and parking facilities, private and communal amenity space and the density per hectare of the dwellings and habitable rooms. It demonstrates that the apartments would either meet or exceed the quality of development called for by the SPGs *St Helier design guidance*, *Density Standards* and *Residential space standards*.
28. I do not consider that the proposed development would be harmful to the nature of the site or its local context or be contrary to Policy H2.

*The effect of the proposed development on the green backdrop zone*

29. The decision notice states that the proposed development by reason of its height would be inappropriate in scale and harmful to the green backdrop zone, contrary to Policies GD8 and H1.
30. Policy GD8 (Green backdrop zone) indicates that the proposed development should not result in the net loss of green infrastructure or adversely affect the landscape character of the green backdrop zone. Policy H1 (Housing quality and design) does not contain any provisions relating to the green backdrop zone.
31. The proposed development would be three storeys high, including the apartment in the roof space, but excluding the basement. The site is in St Helier's Character Area 10 (Town edges/slopes), where the Plan on page 97 and the SPG *St Helier design guidance* both indicate that development up to six storeys high may be acceptable.
32. Although the site is on rising ground only short range views of it can be obtained. It does not form part of the backdrop to town centre street-scenes or form a significant part of the scenery observed from the slopes of higher ground.
33. The Housing, Environment and Placemaking Directorate have commented on the proposed development from a policy perspective. They state that it would not conflict with the Plan's spatial, placemaking or landscape / townscape policies and that Policy GD8 is of little relevance following the clearance work already carried out.
34. The site was in the green backdrop zone when the approved development was considered and the more exacting provisions of Policy BE3 (Green Backdrop Zone) of the Revised 2011 Island Plan applied. Planning permission was however granted and landscaping conditions were imposed. It would be inconsistent to treat the proposed development differently, particularly when a new landscape scheme has been submitted which could be secured by new planning conditions and would assimilate the proposed development into its surroundings. Policy GD8 would be complied with.

*The arrangements for dealing with the additional excavated material*

35. The decision notice states that the increase in excavation would result in significant quantities of waste material to be transported off-site, contrary to the aspirations of the waste hierarchy and to Policy WER1. The Plan's Glossary defines the waste hierarchy as an order of priorities for managing waste materials, the priority option being waste prevention followed in order of priority by waste minimisation, re-use of materials, recycling and, the least preferred option, disposal. Policy WER1 (Waste minimisation) states: -

"To minimise the waste arising from ... construction activity, and to recycle, re-use and recover as much as possible of the generated waste materials in accordance with the waste hierarchy, development ... with the potential to generate significant quantities of waste material through construction activity (such as the development of five homes or 200m<sup>2</sup> floorspace), will only be supported where a satisfactory site waste management plan has been provided.

This must include details of opportunities that have been taken to maximise on-site management of waste.

Upon the commencement of the development, all waste transactions must be clearly recorded in the site waste management plan and be available for inspection."

36. The appellants informed the hearing that 1,726m<sup>3</sup> of material had already been excavated in connection with the approved development. The proposed development involved a total volume of 2,055m<sup>3</sup>, leaving only 329m<sup>3</sup> still to be excavated. They stated that, since all of this would be reused on site as either backfill or regrading material, the waste hierarchy and Policy WER1 would be complied with.
37. At my request the appellants updated their submitted site waste management plan on 2 July 2024. As it stands, the updated plan does not set out in sufficient detail the information that was given to the hearing, but this is a matter that can be dealt with satisfactorily by a planning condition requiring further details to be submitted and approved before the proposed development is commenced. This would ensure compliance with Policy WER1.

*Traffic and parking considerations*

38. These considerations did not feature in the reasons for refusal. They have been raised by the Parish and by objectors. Concerns have been expressed about the lay-by, visibility, congestion, pedestrian safety, visitor parking and the College Hill junction with Pleasant Street further towards the town centre. The appellants have submitted a transport statement dated 21 October 2023 which was prepared by consultants.
39. The statement concludes (a) that the access for the proposed development has been designed to approved standards with satisfactory visibility splays for the speed of traffic on College Hill and would provide a safe environment for pedestrians, cyclists and motorists, (b) that the small amount of additional traffic which would be generated would not result in any material impact on traffic congestion or road safety on College Hill or at the junctions to the north and south and (c) that the proposed development does not warrant the

improvements to the College Hill junction with Pleasant Street put forward by the Parish in their consultation response of 7 September 2023.

40. With regard to other traffic and parking concerns that have been raised, the statement indicates (i) the number and size of the parking spaces would comply with current standards, including charging points, (ii) drivers using the parking spaces would be able to turn so as to enter and leave the site in forward gear, (iii) in support of sustainable transport policies, visitor parking spaces would not be specifically provided, (iv) the lay-by would be on private land managed with the apartments and marked for delivery vehicles only, it would have sufficient space for the safe manoeuvring of a large van and vehicles using it would not obstruct the carriageway or the footway and (v) refuse collection vehicles would operate from the kerbside as they normally do for other properties in the built-up area.
41. I can foresee that from time to time the footway and/or the carriageway could be obstructed by vehicles waiting to enter the parking spaces whose passage was prevented by drivers using the layby. Having regard to the volume of passing traffic and the frequency with which access to the parking spaces and to the lay-by would be required at the same time, I consider that this would be an occasional and short-lived inconvenience rather than a significant highway concern.
42. I have no reason to doubt the reliability of the transport statement. I have concluded on this issue that the proposed development would comply with the relevant policies in the Plan, namely SP3 (Placemaking), TT1 (Integrated safe and inclusive travel) and TT4 (Provision of off-street parking).

### **Overall conclusion**

43. My overall conclusion is that the proposed development satisfies the tests in the various SPGs and is in accordance with the Bridging Island Plan. This conclusion is subject to the entering into of a planning obligation agreement, the principle of which has been accepted by the appellants, providing for a contribution towards the provision of the Eastern Cycle Route Network. Planning conditions are also required to deal with various outstanding details, as set out in paragraph 45 below, for the reasons stated there. These conditions are based on those recommended in the report to the Planning Committee, with changes dealing with construction and environmental management and site waste management, as explained in paragraphs 21 and 37 above, and with other matters discussed at the hearing.
44. I have not proposed a planning obligation agreement relating to improvements to the College Hill junction with Pleasant Street, since these were not supported by the transport consultants or by the Department.

### **Recommendation**

45. I recommend that, subject to the entering into within 6 months of the date of the Minister's decision of a suitable planning obligation under Article 25 of the Planning and Building (Jersey) Law 2002 to make a contribution of an agreed amount towards the provision of the Eastern Cycle Route Network, the appeal is allowed and planning permission is granted for development on the land parcel at the rear of Royal Bank Court, College Hill, St. Helier JE2 4RX, consisting of the excavation of the ground level, the construction of four two-

bedroom apartments and one single-bedroom apartment, the construction of a granite retaining wall adjoining College Hill and the creation of a new vehicular access onto College Hill, in accordance with the application P/2023/0635 and the amended plans and documents submitted therewith, subject to the following conditions: -

*Standard conditions*

- A. The development shall commence within three years of the decision date.

Reason: The development will need to be reconsidered in the light of any material change in circumstances.

- B. The development shall be carried out entirely in accordance with the approved plans and documents listed below.

Reason: To ensure that the development is carried out as approved.

*Additional conditions*

1. Prior to the commencement of the development, details shall be submitted to the Chief Officer to demonstrate that the development as approved will outperform the target energy rate (i.e. the minimum energy performance for new dwellings required by building bye-laws) by 20%, using the Jersey Standard Assessment Procedure (JSAP) calculator or the Simplified Building Energy Model (SBEM) tool.

Reason: To comply with Policy ME1 of the Bridging Island Plan

2. Prior to the commencement of the development, a scheme of hard and soft landscaping shall be submitted to and approved in writing by the Chief Officer. The scheme shall include details of all boundary treatments and indications of all existing trees and hedgerows on the land, identifying those to be retained and setting out measures for their protection throughout the course of the development. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the first residential occupation of the dwelling or the completion of the development, whichever is the sooner, and any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.

Reason: To deliver design quality, to protect and improve green infrastructure assets and to provide new green infrastructure assets pursuant to Policies GD6 and NE2 of the Bridging Island Plan.

3. The measures outlined in the approved Habitat Compensation and Enhancement Plan (ref. NE/ES/CG.03, March 2023, Nurture Ecology) shall be implemented prior to the commencement of the development, continued throughout the development (where applicable) and thereafter retained and maintained as such. Any variations from the approved plan that may be required as a result of findings on site shall be agreed in writing in advance with the Chief Officer prior to implementation.

Reason: To protect biodiversity pursuant to Policy NE1 of the Bridging Island Plan.

4. Prior to the commencement of the development, full details of all the materials to be used in the construction of the external surfaces of the development, including hard landscaping materials, shall be submitted to and approved in writing by the Chief Officer. The development shall be carried out in accordance with the approved details and retained as such.

Reason: To protect the character and identity of the area and to enhance its setting pursuant to Policy GD6 of the Bridging Island Plan.

5. Prior to the commencement of the development, details of the proposed site levels and of the finished floor levels of the apartments shall be submitted to and approved in writing by the Chief Officer. The development shall be carried out in accordance with the approved details.

Reason: To protect the character and identity of the area pursuant to Policy GD6 of the Bridging Island Plan.

6. Prior to the commencement of the development, an elevation drawing at a scale of 1:50 depicting the fence to be installed on the east of the site shall be submitted to and approved in writing by the Chief Officer. The development shall be carried out in accordance with the approved details of the fence and the fence shall be retained as such.

Reason: To protect the character and identity of the area and to enhance its setting pursuant to Policy GD6 of the Bridging Island Plan.

7. Prior to the commencement of the development, further details of the methods to reduce, recycle and reuse excavation and construction waste, shall be submitted to and approved in writing by the Chief Officer. The details shall be set out in a Site Waste Management Plan ('SWMP') which shall assess, quantify and propose a method for each material identified. Thereafter, the SWMP shall be maintained as a living document and waste management shall be implemented in full accordance with its terms. Any variations shall be agreed in writing with the Chief Officer prior to the commencement of such work.

Reason: To ensure that waste excavation and construction materials are minimised wherever possible, and where they do arise, that they are reused and recycled, so that the amount of waste is minimised in accordance with Policy WER1 of the Bridging Island Plan.

8. Prior to the commencement of the development, details of the Percentage for Art contribution shown on drawing no. 2832/P6/C shall be submitted to and approved in writing by the Chief Officer. The development shall be carried out in accordance with the approved details and the art work shall thereafter be retained as such.

Reason: To accord with the provisions of Policy GD10 of the Bridging Island Plan.

9. The approved Construction and Environmental Management Plan shall be implemented in full until the completion of the development. Any variations

to the Plan shall be agreed in writing by the Chief Officer prior to their implementation.

Reason: To protect residential amenities pursuant to Policy GD1 of the Bridging Island Plan.

10. Prior to the first residential occupation of any of the apartments, the car and bicycle parking (complete with electric vehicle charging infrastructure) and the storage facilities shall be installed in accordance with the approved drawing no. 2832/P2/C and made available for the use of residents. The facilities shall thereafter be retained as such.

Reason: To ensure that the car and bicycle parking and the storage facilities are installed and made available for the use of residents without delay pursuant to Policies TT2 and TT4 of the Bridging Island Plan.

11. Prior to the first residential occupation of any of the apartments, visibility splays shall be provided in accordance with the approved drawing no. 2832/P1/C. The visibility splays shall thereafter be retained and nothing that may cause an obstruction to visibility shall be placed within them.

Reason: In the interests of road safety pursuant to Policy TT1 of the Bridging Island Plan.

12. Prior to the first residential occupation of any of the apartments, drainage works, including connections to the public foul sewer and surface water disposal, shall be completed in accordance with the approved Development Drainage Impact Assessment and the further details to be approved by the Chief Officer pursuant thereto. The works shall be retained thereafter.

Reason: To provide satisfactory drainage in accordance with Policies WER6 and WER7 of the Bridging Island Plan.

### *Approved plans and documents*

Existing Site Plan – 2832/S01/B  
Section Plan Existing Site Sections - 2832/S05/A  
Schedule of Accommodation - 2832/P14/A  
Ground Floor Plan - 2832/P3/C  
First Floor Plan - 2832/P4/C  
Second Floor Plan - 2832/P5/C  
South & West Elevations - 2832/P6/C  
North & East Elevations – 2832/P7/A  
Site Sections - 2832/P10/A  
Landscape Plan - 2832/P13/A  
Site Plan & Visibility Splays - 2832/P1/C  
Basement Plan - 2832/P2/C  
Construction and Environmental Management Plan  
Location Plan - 2832  
Habitat Compensation & Enhancement Plan - NE/ES/CG.03  
Site Waste Management Plan  
Site Plan - 2832/P1/A  
Development Drainage Impact Assessment  
Transport Statement

Design Statement  
Planning Statement

Dated 23 July 2024

*D.A.Hainsworth*  
Inspector