

REPORT SUMMARY

REFERENCE NUMBER: 23/503997/FULL

APPLICATION PROPOSAL:

Change of use of land to residential. Erection of 2no. detached cottages, 1no. detached dwelling with outside pool and conversion of Cattle Barn to pool house. Conversion of dovecote to ancillary residential outbuilding. Restoration works to Grade II listed Slype and Dovecote and restoration of the historic landscape including repair of 2 ragstone walls. Demolition of 2no. modern barns. New vehicular access to Lower Street, parking and other associated works (resubmission of 22/502610/FULL).

ADDRESS: Abbey Farm Lower Street Leeds Maidstone Kent ME17 1TL

RECOMMENDATION: GRANT PLANNING PERMISSION subject to conditions and legal agreement subject to removal of objection from KCC Ecology and no additional material considerations being raised as a result of the departure site and press notices that expire on 11.04.2024

SUMMARY OF REASONS FOR RECOMMENDATION:

The proposal does not accord with the spatial strategy of the Development Plan and will result in harm to the character and appearance of the countryside, contrary to policies SS1 and SP17 and there are no Local Plan policies that directly support the development. As the application is not in accordance with the adopted Local Plan, other material considerations would need to outweigh the harm to justify granting planning permission.

The proposal seeks to establish dwellings on what is predominantly a site characterised by a lack of development. As such the development would result in some harm to the intrinsic character of the area- there would be new buildings, access, significantly more hard surfacing for car parking/turning and domestic paraphernalia where there currently is very little.

The proposal also causes less than substantial harm to the settings of off and on-site listed buildings and to the 2 Conservation Areas.

It is considered that the dwellings themselves are well designed and reflect the character of the area. The legal agreement would ensure all the dwellings remain under the one ownership which reduces the problems of site fragmentation.

An extensive area of the proposed development site is protected as a scheduled monument under the Ancient Monuments and Archaeological Areas Act 1979. The monument is a multi-period site which retains nationally significant remains of the Leeds Priory monastic complex, a post-dissolution manor house, and part of their associated grounds. The applicant has been liaising with Historic England in the formulation of the proposed scheme and it is supported in principle by that statutory consultee.

The proposal presents the opportunity to restore and safeguard significant heritage assets at risk. It is concluded that the benefit of restoring and safeguarding the historic assets on the site, most of which are listed and scheduled monuments outweighs the harm the development causes to the countryside and the non-compliance with the Borough’s spatial strategy and the less than substantial harm the development would cause to the setting of heritage assets.

A financial bond should be required by legal agreement to ensure that there are adequate financial resources for all the heritage benefits to be secured and safeguarded in the long term.

Subject to KCC Biodiversity’s acceptance of the revised bat mitigation to The Slype, the application could be determined as all necessary mitigation/compensation would have been fully assessed.

REASON FOR REFERRAL TO COMMITTEE:

The application is a departure from the Local Plan.
Called in by Leeds PC and Cllr Gill Fort.

| | | |
|--|--------------------------------------|--|
| WARD: Leeds | PARISH/TOWN COUNCIL: Leeds | APPLICANT: Harry Fern AGENT: DHA Planning Ltd |
| CASE OFFICER: William Fletcher | VALIDATION DATE: 19/09/23 | DECISION DUE DATE: 29/03/24 |
| ADVERTISED AS A DEPARTURE: Yes | | |

Relevant Planning History

11/0087

Conversion of two former agricultural buildings to provide three residential dwellings as shown on drawing nos. L.01/B, L.02/A, L.05/A, P469/3, P.02/E, P03/D, P.07/B, P.06/C, P.05/C, P.08/A received 21/1/11: as amended by drawing no. P.01/G received on 29/9/11.

Approved 07.11.2011.

14/505250/FULL

Renewal of Planning Permission (reference MA/11/0087) to allow the conversion of two former agricultural buildings to provide three residential dwellings as shown on drawing nos. L.01/B, L.02/A, L.05/A, P469/3, P.02/E, P03/D, P.05/C, P.06/C, P.07/B, P.08/A received 30/10/14; and drawing no. P.01/G received 10/2/15.

Approved 11.02.2015.

22/502610/FULL

Phased development comprising the erection of a new self-build detached dwelling and conversion of cattle barn to a pool house, erection of 2no. detached residential gatehouses, restoration works to listed structures (slype and dovecotes), demolition of two modern barns, restoration of the former Capability Brown Landscape, access and other associated works (phasing plan submitted).

Refused 15.08.2022 due to:

- domestication, harmful to the character and appearance of the countryside
- visually intrusive along Lower Street.
- substantial harm to the significance, fabric and setting of the designated heritage assets (including Scheduled Monuments)
- harm to the non-designated heritage asset (Brownian landscape).
- an unsustainable countryside location

22/502611/LBC

Listed Building Consent for restoration and repair works to the Slype, Dovecotes, medieval wall to the south east of Abbey Farmhouse, and northern boundary wall. Conversion of Cattle Barn to a pool house and demolition of modern barns.

Withdrawn 18.08.2022.

Officer note: No Listed Building application has been submitted as the site and most of the structures are Scheduled Monuments, and therefore Scheduled Monument Consent (via Historic England) would be needed for the proposed works. The GII listed wall has no proposed works to it (aside from repairs) and therefore Listed Building Consent is not required.

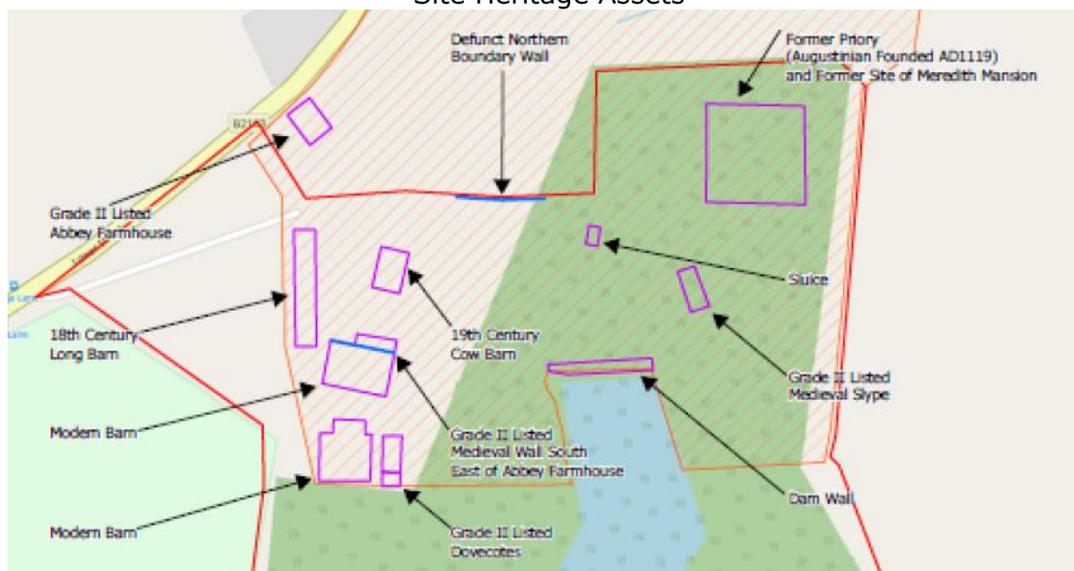
MAIN REPORT

1. DESCRIPTION OF SITE

- 1.01 In policy terms, the application site is located in the countryside outside of all settlement boundaries as defined within the Maidstone Borough Local Plan.
- 1.02 Abbey Farm sits between the two main areas that form Leeds village, and within an open landscape to the east of Lower Street (B2163), which runs through the centre of the village. The site is accessed from Lower Street via an existing gated access and driveway.
- 1.03 The boundary of the application site is approximately 10m from the Leeds Upper Street Conservation Area. The Lower Street Conservation Area sits approximately 100m to the northeast of the site at its nearest point.
- 1.04 The main part of the application site is set back from the roadside, screened by a belt of mature trees.
- 1.05 The site is approximately 9.5 ha, encompassing part of a Scheduled Monument, which comprises the above and below ground archaeological remains of the medieval Leeds Priory, with associated Slype, and site of the later 17th and 18th century Meredith Mansion (subsequently demolished) set within a landscape thought to have been created by Capability Brown (referred to as the "Brownian landscape").
- 1.06 The undeveloped parts of the site comprise clearings within wooded surroundings and scrub, interspersed by the buildings and areas of hardstanding.
- 1.07 Set within a clearing to the northwest of the site, are the redundant former farmyard buildings of Abbey Farm. The former Long Barn and redundant Cattle/Cow Barn are in the process of being converted to 3 no. residential dwellings as a result of application 14/505250/FULL. This planning application would instead convert the Cattle Barn into a Pool House.
- 1.08 Immediately adjacent to the site beyond the northeast edge is the Grade II listed Abbey Farmhouse, dating from the late 17th century. The farmhouse is not part of the site, but the range of buildings within the northwest portion of the site were formerly associated with Abbey Farmhouse, and therefore lie within its setting and curtilage.
- 1.09 The Len Valley Landscape of Local Value as designated on the Maidstone Local Plan Policies Map sits to the north of the site, separated by Lower Street.
- 1.10 Much of the proposed site is recognised as a Scheduled Monument, which includes the Dovecotes and Slype and associated remains, which are also recognised as GII listed. The 'Walls to South East of Abbey Farmhouse' are also GII listed.

Historic Significance

Site Heritage Assets



- 1.11 The Slupe consists of the remains of a medieval building with post-medieval brickwork additions and its attached walls. It was potentially related to monastic water management.
- 1.12 Dovecotes are important indicators in that their size and design depended upon status and land ownership. The Dovecote is thought to date to the 16th Century with later alterations.

Photo of the Dovecote when last 'intact' c.1911



- 1.13 The Slupe and the Dovecotes at Abbey Farm are both recorded in Historic England's Heritage at Risk Register 2023 as are the above and below ground archaeological remains of the medieval Leeds Priory. The condition of all is recorded as 'very bad' and the priority category as A(A) which is the highest category of priority.
- 1.14 Both buildings are at risk of serious structural decay with extensive damaging vegetation growing throughout. There have been multiple rounds of demolition on site over the course of time and it is very fortunate that both buildings have survived until the present day.

- 2.03 The design adopts a Queen Anne period style. Red English bond brick on the external walls of the dwelling with quoining detailing, cast iron rain water goods, flat gauge arches to window headers and timber sash windows to the ground and first floor with 3 timber dormer casement windows in a mansard clay tiled roof accompanied by a traditional chimney and weather vane feature. A set of stone steps will lead to a canopied front door. The rear elevation has a rubble stone faced basement level, presenting five separate metal framed glass double doors opening out into the rear garden. A brick wall is planned to encircle the main residential area.
- 2.04 The proposal also includes the restoration and conversion of the existing Cattle/Cow Barn to provide a pool house (in lieu of its permitted conversion to a dwelling). The restoration of the building would include a handmade peg tile roof, restored red brick walls to matching existing and painted metal glazed bi-fold doors on the eastern elevation.
- 2.05 Two 3-bedroom cottages are proposed to front the entrance of the site onto Lower Street. It is proposed that these will not be sold separately but will be retained within the wider land ownership and rented out.
- 2.06 The proposal seeks the restoration of historic assets as follows:
- Known extent of Leeds Priory remains (Scheduled Monument)
 - The Slype (Scheduled Monument and Grade II Listed)
 - Dovecote (Scheduled Monument and Grade II Listed)
 - Wall to southeast of Abbey Farmhouse and Modern Barn (Grade II listed)
 - Northern boundary wall (unknown date but likely medieval)
 - Culvert and Dam (undesigned features, likely Capability Brown Landscape)
 - Landscape restoration
 - Conservation management
- 2.07 The restored Dovecote will be used as an ancillary residential outbuilding (indicated to be a detached dining room). The restored Slype will not be re-used domestically because it has ongoing importance for hibernating bats.

3. POLICY AND OTHER CONSIDERATIONS

Maidstone Borough Local Plan 2017:

SS1 - Maidstone borough spatial strategy
SP17 – Countryside
SP18 – Historic environment
SP20 - Affordable housing
DM1 - Principles of good design
DM3 - Natural environment
DM4 - Development affecting designated and non-designated heritage assets
DM21- Transport impacts of development
DM23 - Parking standards
DM30 - Design principles in the countryside

The National Planning Policy Framework (NPPF):
National Planning Practice Guidance (NPPG):
Maidstone Landscape Character Assessment 2012 (Updated 2013):

Local Plan Review (LPR):

The Regulation 22 Local Plan Review (LPR) submission comprises the draft plan for submission (Regulation 19) dated October 2021, the representations and proposed main modifications.

The latest position on the Local Plan Review at the time of writing is that this Council invited the Inspector to make any changes necessary to the Main Modifications in order to make the Plan sound. The Inspector has done so in his Final Report (8/3/2024) and so the recommendation is simply one of adoption to PAC PI, Cabinet and, crucially, Council on the 18th, 19th and 20th of March. However, if the recommendation to adopt is accepted, then the Plan would still not have full weight because the 6 week period for judicial review would need to expire (i.e 6 weeks from the date of the Council's decision) and so, at this stage, the LPR enjoys 'substantial' weight.

SS1 – Maidstone borough spatial strategy
SP2 – Maidstone urban area
SP10A– Housing mix
SP10B- Affordable Housing
SP14A -Natural Environment
SP15 – Principles of good design
HOU5 – Density of residential development
TRA4 – Parking standards (Appendix B)
Q&D6 – Technical Standards
Q&D7 – Private open space standards

4. LOCAL REPRESENTATIONS

Local Residents:

4.01 13 objections for the following (summarised) reasons:

- Impacts on ecology
- Harm to historic assets
- Highways Harm
- Unsustainable location
- Domestication of countryside
- Design not in keeping with surrounding development
- Inadequate infrastructure
- Boundary disputes (under the planning system this is not considered a material consideration)

Leeds Parish Council

4.02 Objection:

- the scale and nature of the development not in keeping with any other building in the village.
- Until fences were recently erected together with keep out signs, paths were used by current residents since the 1960's. This does not provide confidence in the statement by the applicant that the application will allow public visiting rights.
- The main house is not of the architectural quality, it is pastiche of a William and Mary house that will dominate the landscape and is not in keeping
- Danger of additional access point onto the B2163 near the brow of the hill as close to entrances for the playing fields which are used by youth football teams.
- no details regarding the impact on the Priory stream
- concerned that any renovation carried out by this applicant would not be of the quality required.

- The Long Barn renovation has not been carried out in a historically sympathetic way with modern tiles and the old oak roof timbers where not reused or reclaimed.
- no details of the wildlife impact from enlarging the lake
Officer Note: Plans do not indicate that the lake would be enlarged as part of the application. It is not referred to in any of the documents submitted in support of the application.

Councillor Gill Fort

- 4.03 Request the application be heard at Planning Committee. Reasons have not been given for the request in this instance but this Councillor has provided comments on previous submissions which relate to design matters as well as highways impacts and heritage impacts.

5. CONSULTATIONS

(Please note that summaries of consultation responses are set out below. Comments are discussed in more detail in the appraisal section where considered necessary)

KCC Ecology

- 5.01 Works to the Slype has the potential to have detrimental effects on hibernating bats and that further survey is necessary. The necessary further surveys will need to be undertaken in accordance with best practice and by a suitably qualified and experienced ecologist.
- 5.02 Following further survey, the survey results, along with any necessary mitigation/compensation, will need to be submitted prior to determination of any planning application.

(Officer note: These extra survey details have been provided and comments from KCC Ecology are awaited).

- 5.03 Clearance of vegetation is now revised to three, c.16m wide 'rides' to provide heritage viewpoints and so adverse effects on ecological features have been largely avoided and can be mitigated for. From an ecological perspective there is also the potential that these 'rides' could be managed to provide ecological benefits to the site as well as the heritage viewpoints.

Natural England

- 5.04 No objection.

Gardens Trust

- 5.05 Concerns relating to the design of the development and its impact upon the landscape.
- 5.06 Request that Historic England revisit their decision not to list the Leeds Abbey landscape.

Historic England

- 5.07 No objection subject to conditions on:
- The creation of a Heritage Management Plan
 - Heritage Mitigation Strategy
 - phasing plan and associated conditions to ensure the timely undertaking and completion of works which provide heritage benefits
 - The repair, restoration and sustainable re-use of the dovecote and slype.

KCC Highways

5.08 No objections subject to conditions.

KCC Archaeology

5.09 No objections subject to conditions

KCC Flood and Water Management

5.10 No comments

KCC Minerals and Waste

5.11 No comments

Southern Water

5.12 The proposed development is located approximately 450 metres from the Leeds Wastewater Treatment Works

5.13 *(Officer Note) The application is just outside of the buffer zone (1m). There are existing dwellings that are closer to the WWTW and that the site lies 'upwind' of the prevailing SW wind direction, the development is not at risk of bad odours.*

Kent Police

5.14 No comments

6. APPRAISAL

6.01 The key issues are:

- Spatial Strategy
- Character and Appearance
- Heritage Impact
- Landscape
- Financial Considerations/Planning Balance
- Sustainability
- Affordable Housing
- Biodiversity and Arboriculture

Spatial Strategy

6.02 In policy terms the application site is located in the countryside and is the least appropriate area for new build residential development in the hierarchy within the Spatial Strategy policy SS1. The starting point for assessment of all applications in the countryside is Local Plan Policy SP17. Policy SP17 states that development proposals in the countryside will only be permitted where:

- a) there is no harm to local character and appearance, and
- b) they accord with other Local Plan policies

6.03 It is not assessed that the site is a 'brownfield' site and as such there are no exception policies to SP17 allowing residential development in this location.

6.04 In relation to SP17, the impact of the development on local character and appearance is considered against design policies DM1 and DM30 in the following section. In this instance there are a number of heritage assets on site and the relevant sections of policies SP18 and DM4 will also be considered.

Character and Appearance

- 6.05 In order to achieve high quality design, Local Plan policy DM1 sets out the expectation that proposals will positively respond to and, where appropriate, enhance the local, natural, and historic character of their surroundings. It is important that development contributes to its context. Key aspects of built development will be the scale, height, materials, detailing, mass, bulk and site coverage.
- 6.06 Policy DM30 has similar goals to DM1 and also includes the following "Where built development is proposed, there would be no existing building or structure suitable for conversion or re-use to provide the required facilities. Any new buildings should, where practicable, be located adjacent to existing buildings or be unobtrusively located and well screened by existing or proposed vegetation which reflect the landscape character of the area".

Design of the proposed new 6 bedroom Dwelling

- 6.07 The design philosophy has changed since the previously refused application, and is no longer focused on recreating the Brownian landscape. A design of a later C17/early C18 inspired house within a later C18 garden is no longer considered inappropriate. Whilst of some scale, the proposed dwelling fits within the landscape and responds to and acknowledges the history of the site. The proposed location is a be less sensitive one for the development of a large house, and the associated services (car parking, etc).
- 6.08 In terms of the impact of the site on the wider area, the majority of the site (i.e. where the large dwelling is to be erected) is not overly visible from the street scene and as such its landscape impact upon the wider area is limited.
- 6.09 However, it is acknowledged that the site as it exists is unoccupied other than minor buildings, some of which have been granted permission to be used as a dwellings under prior notification, as well as the heritage assets detailed above and other miscellaneous buildings. The intrinsic character of the countryside is generally that of a lack of development.
- 6.10 The proposal seeks to establish a new large dwelling on what is predominantly a site characterised by a lack of development. It would result in significantly more hard surfacing for car parking/turning and domestic paraphernalia where there currently is very little. As such the development would result in some harm to the intrinsic character of the area. For the harm to be acceptable, it would need to be offset by the benefits, which are discussed below.

Design of the proposed new Cottages

- 6.11 Cottage 1 will be finished in painted clapboard walls, painted timber windows and doors with a clay peg tile roof. Cottage 2 will be finished with ground floor level brickwork, hanging clay tiles at first floor level, painted timber doors and windows and a clay peg tile roof.
- 6.12 Both offer two different interpretations of vernacular properties that can be found within Leeds. The proposed scale and staggered building line makes these appear more organically formed. The proposed materials contribute to the different appearance. These will also weather differently and will soften over time.
- 6.13 The applicant has agreed that these will not be sold separately but will be retained within the wider land ownership and rented out to persons (and their families) engaged in the maintenance of the property. This will reduce the severance of the site into multiple ownerships and allow long term control. This would be secured by legal agreement.

Heritage Impact

- 6.14 Policy DM4 requires new development affecting a heritage asset to incorporate measures to conserve, and where possible enhance, the significance and settings of the heritage assets.

Setting of off-site Listed Buildings – Abbey Farmhouse and Abbey Mill

- 6.15 The development will affect the setting of these designated heritage assets that lie outside the application site.
- 6.16 Abbey Farmhouse (GII) was the main farmhouse and its ragstone retaining boundary wall provides a positive contribution to the character of the Lower Street Conservation Area. Despite the boundary ragstone wall and established trees, there is some visual connection between the farmhouse and the former farmstead where the proposal is to be located.
- 6.17 Abbey Mill House (GII), its associated Outbuilding (GII) and Manor House (GII*) formed part of the original entrance to the Abbey site and there is evidence of the medieval function. Abbey Mill House is approximately 100m north of the application site and when considering the distance and the vegetation around the site there is a long term, established visual separation between the buildings presently.
- 6.18 Overall, the proposed scheme is considered to cause harm which is less than substantial harm to the setting of these neighbouring listed buildings.

Lower and Upper Streets Conservation Areas

- 6.19 The settlement of Leeds is formed of two key groupings (Lower Street & Upper Street) which are separated where the road narrows to follow the contours of the valley. The site lies between the two conservation areas which still retain a rural setting, though the linear development has been lost slightly as the built form of the village has gradually expanded outwards since the 1950s.
- 6.20 The application site lies in a gap which nonetheless contributes to the history, character and significance of Leeds, with the open space and the tall ragstone retaining wall and Abbey Farmhouse providing some form of separation between the two CAs.
- 6.21 The proposed scheme would alter the entrance onto site and create an additional entrance together with the construction of two new dwellings facing onto the road.
- 6.22 The creation of the new entrance would have an impact on the understanding of the overall site. However, the new entrance to the farmhouse can be seen in a similar position of the 1951 OS map, and therefore there is a precedent for this new access. The repositioning of the original access would cause less than substantial harm as it would appear to be a secondary access and not the main approach.
- 6.23 The creation of the large new dwelling within the former farmstead has the potential to be seen from a wider public realm. The existing farm buildings can be seen as a collection of roof spaces, but the proposed large dwelling will be taller than these, and parts of it will be seen through the clearing in the trees.
- 6.24 Overall, the proposed scheme is considered to cause less than substantial harm to the setting of the listed buildings off site and to the setting of the conservation areas.

Restoration of on-site Heritage Assets and historic features

- 6.25 The NPPF recognises that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance. There would be very

significant benefits from securing the restoration and future maintenance of the historic assets on site.

- The known area of above and below ground archaeological remains of the former Priory (Scheduled Monument) will be cleared of scrub and trees to avoid continued below ground damage from roots
- The Slype (Scheduled Monument and Grade II Listed) is in poor condition with the brick barrel vault having pushed the external walls out with a partial collapse to the south end. The intention is to remove the southern section of collapsed/collapsing vault. The vault will be retained with new support provided by hangers from above and exposed straps to the underside. A new modern roof with new peg tile covering and hipped ends is proposed to protect the fabric, and the walls will need consolidation and some local re-building.

Photo of the Slype in 2023



- Dovecotes are exceptionally rare, and the restoration and long-term safeguarding would be a significant benefit. The intention is to reinstate the Dovecote(s) over the full length of the original building and to re-build the missing crowstep gables with central mullioned gable windows and render surrounds. It is intended to be used as a dining hall. The two eastern windows will be repaired and glazed and render reinstated to the surrounds. The north door reveals and arch will be re-formed with a new oak door installed. The southern section eastern door will be re-made in oak.

Photo of the Dovecote in 2023



- The proposal involves the retention and restoration of the Grade II medieval wall. The clearing of vegetation and removal of the surrounding dilapidated Dutch Barn will open up views and remove risk of further damage to the wall.

Photo of the upstanding listed wall in 2022.



- The likely medieval northern boundary wall will be repaired, and the top wall capped and encompassed into the landscaping of the site. The structure will be maintained thereafter.
- The Dam and Culvert will be subject to vegetation clearance, treatment of surfaces, and clearance of debris from the stream and weir. Repair works will be carried out to the grille, chamber, weir and spillways.
- The 18th century range "Long Barn" and a mid-late 19th century "Cattle Barn" have extant consent for residential conversion with the works currently ongoing. The conversion of the Long Barn will be completed as per its extant permission to create two dwellings. The Cattle Barn would not be used as a dwelling as per its extant consent but converted into a pool house for the main large dwelling.

Photo of the long barn undergoing restoration in 2022



- The Modern Barn will be carefully removed of asbestos before the remaining structure is demolished and removed.

Photo of the 20th century barns in 2023



- 6.26 In conclusion, the proposed scheme is considered to cause harm to the setting of the designated heritage assets, both those on the site, and the adjoining listed buildings and conservation areas. This harm is considered to be less than substantial taking into account past piecemeal development that has occurred on the site and within the village of Leeds.
- 6.27 Under the NPPF, (2023 – para. 199) great weight should be given to heritage asset conservation (and the more important the asset, the greater the weight should be), irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to the significance.
- 6.28 Further guidance in the NPPF (2023- para 202) is provided, advising that any 'less than substantial harm' to the significance of a designated heritage asset should be weighed against any public benefits, including, where appropriate, securing its optimum viable use. Public benefits can include protection of the historic environment, referred to as heritage benefits
- 6.29 The Scheduled monument on the site is a multi-period site which retains nationally significant remains (above and below ground) of Leeds Priory monastic complex, a post-dissolution manor house, and part of their associated grounds.
- 6.30 The heritage benefits are to bring three scheduled monuments off the national Heritage at Risk register and provide them with long term protection, and therefore this should be afforded great weight as part of the planning consideration. Additional benefits including allowing some managed public access and wider interpretation, such as the website.
- 6.31 The applicant has been liaising with Historic England in the formulation of the proposed scheme and it is supported in principle by that statutory consultee.
- 6.32 In conclusion, the proposed scheme looks to conserve and protect three highly significant and important assets, which are public benefits that outweigh the less than substantial harm to the Heritage Assets described above.

Landscape

Heritage Landscape

- 6.33 Part of the site is thought to be a relatively small example of 'Capability' Brown's work and thus unusual in its scale for him. However, it has suffered badly from losses and neglect and past inappropriate management and introduction of modern farm buildings.

- 6.34 The application's Landscape Strategy Plan in regard of restoring the Brownian landscape has been revised and a more sensitive approach proposed to take account of ecological interests.
- 6.35 The landscaping proposals for the site will have to take place reflecting and adapting to any historical features found as vegetation removal is undertaken.

Landscape Visual Impact

- 6.36 The applicant has submitted an acceptable Landscape and Visual Appraisal.
- 6.37 The site lies in the Broomfield Undulating Farmlands Landscape Character Area. The assessment notes that this landscape is in 'Very Good' condition and of 'High' sensitivity with guidelines to 'Conserve'.
- 6.38 The study area takes into consideration the elevated land close to the site within the Kent Downs National Landscape. The edge of this nationally important designation is approximately 1.5 miles from the application site.
- 6.39 I agree that the development's visibility would be constrained to a localised setting and that it does not have an adverse impact on the Landscape Character Area including assessment of any views from the National Landscape to the north.

Financial Considerations/Planning Balance

- 6.40 The applicant has submitted that the development of the 3 new houses and associated development (in a location where such development would normally be resisted) needs to be balanced against the benefits that can be secured to heritage assets and the historic landscape.
- 6.41 Paragraph 203 of the NPPF states that LPAs should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities
- 6.42 Paragraph 206 of the NPPF notes that scheduled monuments are assets of the highest significance.
- 6.43 Historic England produce a register of heritage assets (SM, GI & GII*) that are considered 'at risk', with the programme identifying those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. The Scheduled Monuments and Grade II listed Leeds Priory, the Dovecotes, and Slype and associated remains are on the at-risk register, and have been for a number of years.
- 6.44 The proposed scheme would ensure these are taken off the register and provided with a long-term sustainable protection in line with the submitted Heritage Mitigation Strategy. The applicant has agreed to some limited public access to view the historic features of the site, should permission be forthcoming.
- 6.45 There are limited alternatives by which there could be enforcement of the conservation or repair of the structures, and therefore any further decline could result in the loss of these highly significant designated heritage assets. The cost of the works to conserve and protect for the mid-long term has been satisfactorily demonstrated to be prohibitively expensive.
- 6.46 'Enabling Development' would be an alternative option. Paragraph 214 of the NPPF states Local Planning Authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

- 6.47 Whilst only applicable in certain circumstances, enabling development can be a useful tool. In many situations, this is used to allow to build additional houses to cover the conservation deficient (the amount by which the cost of repair of a heritage asset exceeds its market value on completion of repair and conversion, allowing for all appropriate development costs including reasonable developer profit).
- 6.48 The applicant has not made a case that the development proposed is 'enabling development' in line with Historic England's guidance on that approach. The costs of the heritage restoration and long term maintenance are estimated by the applicant to be so large that it would need planning permission for an even greater number of new dwellings to cover all restoration costs and bring in a suitable profit for a developer, which is a key element of the enabling development guidance.
- 6.49 The works to repair and secure the heritage assets (namely the Slype, Dovecotes and other historic features) was costed at c.£2.5M in January 2021 and will have significantly increased at the time of writing. There is also the cost of additional and restorative landscaping and the ongoing maintenance of the assets and restored landscape.
- 6.50 The figures given by the applicant are accepted. It is also agreed that a greater number of housing units would fragment the site, resulting in the loss of historic landscape and would likely cause much more domestic paraphernalia being introduced into the countryside, built form, hardstanding, vehicle movements, etc. It would split the site into multiple ownerships, making it difficult to safeguard and maintain the heritage landscape.
- 6.51 It is therefore concluded that the current proposal of creating a new large country house with two associated cottages in an appropriate location on the site represents an acceptable option overall for protecting, restoring, and maintaining the historical significance of a sensitive site.
- 6.52 There are only 25 scheduled monuments in the borough and include medieval bridges, castles, and other structures of that period. That this site contains such structures shows that the circumstances for this application are entirely unique, there would be no prospect of justification for similar development elsewhere in the borough. It has been assessed that the benefits of restoring and safeguarding the heritage assets on site outweigh the harm caused by the development.
- 6.53 In the light of the importance in the planning balance of ensuring full restoration and long term safeguarding of nationally significant heritage assets, it is recommended that a bond be required by legal agreement to ensure that there are adequate financial resources for all the heritage benefits to be secured.

Sustainability

- 6.54 In policy terms, the application site is located in the countryside within Leeds which the Local Plan does not identify as a settlement.
- 6.55 The application site is approximately 1.8 miles (straight line distance) from Maidstone urban area. There is very limited services within Leeds and whilst there is a bus service at the entrance to the application site, however this appears to be poorly served.
- 6.56 It is accepted that future occupants of the dwelling will be reliant on private vehicles to access goods and services and the following the development the application site will be more intensively occupied with many more vehicle movements than the present arrangement.

- 6.57 It is assessed that the harm that this causes is outweighed by the benefits of restoring and safeguarding the heritage assets which are on site. It is an exceptionally unique circumstance and permitting the proposed dwellings would not weaken the Council's ability to resist similar development elsewhere in the borough.

Affordable Housing

- 6.58 The application needs to be assessed under policy SP20 which relates to affordable housing provision (also LPRSP10 (b)- Affordable Housing).
- 6.59 The application is a 'self build' scheme but that in itself is not relevant to affordable housing policies. The key matter is that the rationale behind the development is that the applicant will be allocating very significant resources into restoring the heritage assets on site.
- 6.60 Additional dwellings on site would require the site to be split into different ownerships and the integrity of the landscape which is itself a non-designated heritage asset would be put at risk. The application is a unique circumstance and it is unreasonable to require the applicant to provide affordable housing on the application site or make an offsite contribution.

Biodiversity and Arboriculture

- 6.61 Local Plan policy DM1 states that all new development shall protect and enhance any on-site biodiversity features or provide sufficient mitigation measures. Policy DM3 states that developers will ensure that new development protects and enhances the natural environment. Policy LPRSP14A (Natural Environment) requires 20% Biodiversity Net Gain (BNG)
- 6.62 Conditions are suggested for on-site BNG, ecological enhancement and tree protection.
- 6.63 The applicant has submitted an ecological impact assessment, which includes details of surveys for protected species, these details are included below:
- Pipistrelle bats were recorded emerging from the Slype.
 - No dormice have been recorded.
 - The bird species recorded within the Site were typical of the woodland habitat present with the most numerous recorded species being wren. No nightingales were recorded using the site during 2023.
 - The eDNA surveys of the lake were negative for great crested newt.
 - No significant reptiles were surveyed.
- 6.64 Mitigation measures are proposed to address the biodiversity on site and these can be conditioned should permission be forthcoming.
- 6.65 In regard of the Slype, additional surveys requested by KCC Biodiversity have now been submitted which demonstrate a hibernating bat assemblage. The applicant has therefore revised the restoration working methods and will provide mitigation and no longer intends the building to be used domestically (storage). These are considered to be sufficient for Natural England to grant a licence to permit the restoration proposals but KCC's formal response is awaited.
- 6.66 Subject to KCCs acceptance of the revised bat mitigation to The Slype, the application could be determined as all necessary mitigation/compensation would have been fully assessed.

Other Matters

- 6.67 All three dwellings are in excess of space standards with spacious rear garden areas and comply with LPR policies Q&D6 and Q&D7.
- 6.68 In terms of residential amenity within policy DM1 of the MBLP, there are no neighbouring properties within the vicinity of the larger dwelling proposed. The two dwellings situated along Lower Street, are positioned in such a way that they do not overshadow or overlook any of the existing dwellings along Lower Street.
- 6.69 The development would be able to provide adequate parking for all dwellings. There are no concerns with the highways aspects of the proposal and the scheme accords with policies DM21 and DM23 of the MBLP.
- 6.70 Conditions on technical standards and water saving are recommended to reflect emerging policies in the Local Plan Review.

PUBLIC SECTOR EQUALITY DUTY

- 6.71 Due regard has been had to the Public Sector Equality Duty, as set out in Section 149 of the Equality Act 2010. It is considered that the application proposals would not undermine objectives of the Duty.

Community Infrastructure Levy

- 6.72 The proposed development is CIL liable. The Council adopted a Community Infrastructure Levy on 25 October 2017 and began charging on all CIL liable applications approved on and from 1 October 2018. The actual amount of CIL can only be confirmed once all the relevant forms have been submitted and relevant details have been assessed and approved. Any relief claimed will be assessed at the time planning permission is granted or shortly after.

7. CONCLUSION

- 7.01 The proposal does not accord with the spatial strategy of the Development Plan and will result in harm to the character and appearance of the countryside, contrary to policies SS1 and SP17 and there are no Local Plan policies that directly support the development. As the application is not in accordance with the adopted Local Plan, other material considerations would need to outweigh the harm to justify granting planning permission.
- 7.02 The proposal seeks to establish a new large dwelling on what is predominantly a site characterised by a lack of development. As such the development would result in some harm to the intrinsic character of the area but is not overly visible from the street scene and as such its impact upon the wider area is limited. The proposed location is considered to be less sensitive for the development of a large house, and the associated services (car parking, etc).
- 7.03 Two additional dwellings are proposed on the southern side of Lower Street, which is the most visually intrusive element of the proposed development.
- 7.04 For all 3 dwellings, residential development in the countryside causes harm, eg there would be a new buildings, access, significantly more hard surfacing for car parking/turning and domestic paraphernalia where there currently is very little.
- 7.05 The proposal also causes less than substantial harm to the settings of off and on site listed buildings and to the 2 Conservation Areas.
- 7.06 It is considered that the dwellings themselves are well designed and reflect the character of the area. The legal agreement would ensure all the dwellings remain under the one ownership which reduces the problems of site fragmentation.

- 7.07 An extensive area of the proposed development site is protected as a scheduled monument under the Ancient Monuments and Archaeological Areas Act 1979. The monument is a multi-period site which retains nationally significant remains of the Leeds Priory monastic complex, a post-dissolution manor house, and part of their associated grounds. The applicant has been liaising with Historic England in the formulation of the proposed scheme and it is supported in principle by that statutory consultee.
- 7.08 The proposal presents the opportunity to restore and safeguard significant heritage assets at risk. It is concluded that the benefit of restoring and safeguarding the historic assets on the site, most of which are listed and scheduled monuments (nationally important archaeological sites) outweighs the harm the development causes to the countryside and the non-compliance with the Borough's spatial strategy and the less than substantial harm the development would cause to the setting of heritage assets.
- 7.09 A financial bond should be required by legal agreement to ensure that there are adequate financial resources for all the heritage benefits to be secured.

8. RECOMMENDATION

GRANT planning permission subject to the following conditions and the prior completion of a legal agreement to secure the heads of terms set out below with delegated authority to the Head of Development Management to be able to settle or amend any necessary Heads of Terms, planning conditions and/or informatives in line with the matters set out in the recommendation and as resolved by the Planning Committee:

s106 to require prior payment of monitoring fees of £1,020 for first obligation and £510 for each additional planning obligation.

HEADS OF TERMS

- **A detailed programme of the overall development to be agreed that will ensure the heritage assets are restored and safeguarded as soon as practicable**
- **Payment of a financial bond to fully cover the heritage assets being restored and safeguarded in accordance with the timetable to be agreed**
- **Limiting the occupation of the 2 'cottages' to persons (and their families) engaged in the maintenance of the wider land and property**
- **The 2 Cottages to remain in the same ownership as the rest of the wider land and property and not to be sold off or otherwise severed.**
- **The maintenance in accordance with approved management plan for the biodiversity improvement of the land for a minimum of a 30-year period**
- **The re-wilded areas being maintained for 30+ years with the maintenance and restoration specified.**

CONDITIONS:

- 1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission;

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004. (

- 2) Plans List - Approved drawings and documents.
- 3) No development (including groundworks) shall commence until Scheduled Monument Consent has been secured and provided for information purposes to the Local Planning Authority.

Reason: Scheduled Monument Consent is required to carry out the approved works to Heritage Assets that justify the grant of planning permission.

- 4) No part of the development (including groundworks) shall commence until a detailed relevant Heritage Mitigation Strategy for that Area (in accordance with the Outline Heritage Mitigation Strategy) has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that heritage assets on site are safeguarded that justify the grant of planning permission.

- 5) No works above ground level to the main house, cottage, or outbuildings will commence until Slype and Dovecotes have been made structurally sound in accordance with details to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that heritage assets on site are safeguarded.

- 6) No occupation of the main house or cottages shall take place until:
 - a) the works to the Slype and Dovecote have been completed in accordance with the details hereby approved, and
 - b) Detailed evidence has been submitted to and approved in writing by the Local Planning Authority that from Historic England will omit the Slype and Dovecote from Historic England's Heritage at Risk Register.

Reason: To ensure that heritage assets on site are safeguarded that justify the grant of planning permission.

- 7) No detailed fit out shall take place to allow the Dovecote to be used as ancillary accommodation unless a broad method statement has been submitted to and approved in writing by the Local Planning Authority. It shall set out the approach to the following matters and shall include mitigation measures necessary to demonstrate that the works/installations will not harm the building's special architectural and historic interest. There shall be no insertion of false or suspended ceilings to the Dovecote building.

The statement shall be supplemented with drawings/specifications of typical details as necessary.

- i) -Plumbing including all ground and above level drainage
- ii) -Ventilation provision
- iii) -Mechanical & Electrical services for heating and lighting
- iv) -Fire strategy - measures for prevention, detection, and means of escape
- v) -New interior lighting scheme

vi) -Any special measures for kitchens and kitchen storage areas

The development shall be carried out in complete accordance with the approved details.

Reason: To protect and preserve the appearance and character of the listed building

- 8) No development (including groundworks) in any Area shall take place until a programme of archaeological work for that Area has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that any archaeological value on site is properly recorded.

- 9) The owner of the site (and any successor in title) must ensure that the following public benefits are made available every year in perpetuity unless otherwise varied and agreed with the Local Planning Authority:

- i) Maintain a public website which details the history of the site, its significance, the results of any historic studies of the site and plans and photographs as appropriate.
- ii) Make the site available for visits by the general public on no fewer than two days per year including the provision of appropriate interpretation materials to help visitors understand and appreciate the historic features of the site.
- iii) Make the site available for access for academic research on no fewer than five days per year.

Reason: To ensure there is a public benefit from the development.

- 10) No works to the Slype or Dovecote shall commence until details of all the proposed materials (through the provision of samples where required) for the works and proposed services have been submitted to and approved in writing by the Local Planning Authority in conjunction with Historic England. The roof materials shall include new Kent peg tiles with clay bonnet hip tiles and the walling shall be of Kentish ragstone. The development shall be constructed using the approved materials.

Reason: To ensure that heritage assets on site are safeguarded that justify the grant of planning permission.

- 11) The new dwellings hereby approved shall not commence until written details and samples of the materials to be used in the construction of the external surfaces of the relevant dwelling have been submitted to and approved in writing by the local planning authority and the development shall be constructed using the approved materials.

- i) For the 2 dwellings fronting Lower Street, the materials shall include: timber joinery, handmade stock bricks, new Kent peg clay roof and hanging tiles, clay bonnet hip tiles, timber boarding and coursed Kentish ragstone plinths
- ii) For the large house, the materials shall include: timber joinery, handmade stock bricks, new Kent peg clay roof tiles, Kentish ragstone

Reason: To ensure the development is carried out to an acceptable visual standard.

- 12) Prior to the commencement of above ground construction works of any of the dwellings, relevant details in the form of large scale drawings of the following matters shall be submitted to and approved in writing by the Local Planning Authority:

- a) new external joinery
- b) details of eaves and roof overhangs in the form of large scale drawings
- c) details of balconies, projecting bays and porch canopies
- d) details of window headers and cills and door headers

Reason: To ensure the development is carried out to an acceptable visual standard.

- 13) The restoration of The Slype, Dovecote, Wall to southeast of Abbey Farmhouse and Modern Barn (Grade II listed), Northern boundary wall walls hereby approved shall not commence until written details and samples of the materials to be used have been submitted to and approved in writing by the local planning authority and the development shall be constructed using the approved materials. These shall include Kentish ragstone.

Reason: To ensure the development is carried out to an acceptable visual standard.

- 14) The development hereby approved shall not commence until 1m by 1m sized sample panels of Kentish ragstone demonstrating the colour, texture, bond and pointing have been constructed on site which shall be approved by the Local Planning Authority. The development shall be carried out in accordance with the approved details. The sample panels shall be retained on site until development using the relevant material is completed.

Reason: To ensure the development is carried out to an acceptable visual standard.

- 15) The development hereby approved shall not commence above slab level until, details of all fencing, walling and other boundary treatments have been submitted to and approved in writing by the local planning authority and the development shall be carried out in accordance with the approved details before the first occupation of the building(s) or land and maintained thereafter;

Reason: To ensure a satisfactory appearance to the development and to safeguard the enjoyment of their properties by existing and prospective occupiers.

- 16) The development hereby approved shall not commence above slab level until a landscaping scheme has been submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall include:

- a) a scheme designed in accordance with the principles of the Council's landscape character guidance (Maidstone Landscape Character Assessment Supplement 2012).
- b) details of the number, size, species, maturity, spacing and position of existing/proposed native trees and landscaping and
- c) a 30 year landscape management plan (Only non-plastic guards shall be used for the new trees and hedgerows).

The details shall specifically include landscaping in accordance with DHA-15841-100 (Ecological Strategy Plan) and be informed and evidenced from the programme of works set out in the Heritage Mitigation Strategy hereby approved.

Reason: In the interests of landscape, visual impact, and amenity of the area and to ensure a satisfactory appearance to the development. The reason for the longer 30 year period is to secure the heritage benefits that justify the grant of planning permission.

- 17) All landscaping specified in the approved landscape details shall be carried out in the first planting season (1 October to end of February) in accordance with a timetable previously agreed with the Local Planning Authority.

The approved landscaping shall be retained and managed in accordance with the approved specification/management plan, and any approved or retained seeding or turfing which fails to establish or any trees or plants which, before a period of 10 years from the completion of the development has expired, die or become so seriously damaged or diseased that their amenity value has been adversely affected, shall be replaced in the next planting season with plants of the same species and size as detailed in the approved landscape scheme unless the local planning authority gives written consent to any variation. No replacement planting or removal of any planting shall take place without the prior written consent of the local planning authority.

Reason: In the interests of landscape, visual impact and amenity of the area and to ensure a satisfactory appearance to the development. The reason for the longer period is to secure the heritage benefits that justify the grant of planning permission.

- 18) No works in any Area shall commence until such time that a detailed Ecological Management Plan and timetable for that Area has been submitted and approved in writing by the Local Planning Authority. The development shall thereafter be implemented and managed in accordance with the approved ecological management details and timetable for at least 30 years.

Reason: To ensure that biodiversity on site is safeguarded.

- 19) The development shall not commence above slab level until details of how decentralised and renewable or low-carbon sources of energy will be incorporated into the development hereby approved to provide at least 10% of total annual energy requirements of each dwelling approved, have been submitted to and approved in writing by the local planning authority. The approved details shall be installed prior to first occupation and maintained thereafter;

Reason: To reduce carbon emissions from development.

- 20) No external lighting shall be installed on the site except in accordance with details to be submitted to and approved in writing by the Local Planning Authority. The submitted details shall be in accordance with the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light, GN01, dated 2011 (and any subsequent revisions) (Environmental Zone E1), and follow the recommendations within the Bat Conservation Trust's 'Guidance Note 8 Bats and Artificial Lighting'. The submitted details shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles) and an ISO lux plan showing light spill. The development shall thereafter be carried out in accordance with the subsequently approved details and maintained as such thereafter.

Reason: To safeguard the night-time environment of the area and nocturnal ecology.

- 21) Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order revoking and re-enacting that Order with or without modification) no development within Schedule

2, Part 1, Part 2 (Class A) or Part 14 of that Order shall be carried out without the permission of the local planning authority;

Reason: To allow the Local Planning Authority some control over future development in the interests of the character and appearance of the locality.

- 22) No development, whether permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order revoking and/or re-enacting that Order, with or without modification) or not, shall be carried out on the areas shown as parking spaces (or service vehicle turning space) or in such a position as to preclude vehicular access to them;

Reason: To ensure adequate parking arrangements

- 23) The visibility splays shown on approved drawings (16546-H-01 Rev 04 Proposed Access and Tracking Plan) shall be provided prior to the first use of the approved new access with no obstructions over 1.05 metres above carriageway level within the splays. The approved visibility splays shall be retained permanently thereafter.

Reason: In the interests of highway safety.

- 24) Prior to the first use of the access the surface finish of the first 5 metres access measured into the site from the edge of the highway (as shown on drawing 16546-H-01 Rev 04 Proposed Access and Tracking Plan) shall be provided in a bound surface and maintained permanently as such.

Reason: In the interests of highway safety.

- 25) The access hereby permitted shall not be brought into use until the existing access has been closed as detailed within drawing 16546-H-01 Rev 04 Proposed Access and Tracking Plan (received 24 Oct 2023).

Reason: In the interests of highway safety.

- 26) No new services (including water, drainage, electricity, gas, phone, broadband or other) shall be installed without the prior written approval of the Local Planning Authority.

Reason: To safeguard the heritage value of the site.

- 27) The dwelling(s) hereby approved shall meet the higher level of water efficiency of 110 litres per person, per day as set out under the building regulations Part G2 or any superseding standard. No dwelling(s) shall be occupied unless this standard has been met.

Reason: To ensure a sustainable form of development

- 28) The dwelling(s) hereby approved shall meet the accessible and adaptable dwellings building regulations Part M4(2) standard or any superseding standard. No dwelling(s) shall be occupied unless this standard has been met and the dwelling(s) shall be thereafter retained as such.

Reason: To ensure the development is in accordance with local and national policy and meets acceptable standards of accessible and adaptable dwellings

- 29) The development hereby approved shall not commence above slab level until details of a scheme for biodiversity net gain of at least 20% on the site have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implanted and retained thereafter for at least 30 years.

Reason: To enhance the ecology and biodiversity in accordance with national and local planning policy

- 30) The dwellings shall not be occupied until a scheme for the enhancement of biodiversity on the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall consist of the enhancement of biodiversity through integrated methods into the fabric of the buildings by means such as swift bricks, bat tubes and bee bricks, and through the provision within the application site of measures such as bird and bat boxes, bug hotels, log piles, wildflower planting and hedgehog corridors. The development shall be implemented in accordance with the approved details prior to the first use/occupation of any unit or area to which the details relate and all features shall be retained and maintained thereafter.

Reason: To enhance the ecology and biodiversity in accordance with national and local planning policy

- 31) No development shall take place until details of the proposed finished floor levels of the building(s), all ground levels of the development, and existing site levels shown at 0.5m contour intervals have been submitted to and approved in writing by the Local Planning Authority. The proposed finished floor levels of all buildings shall be as close to existing site levels as feasible with land raising and retaining structures being avoided where possible. Where any land raising or retaining structures are required they must be clearly justified and kept to the minimum height necessary. The development shall be completed strictly in accordance with the approved details.

Reason: In order to secure a satisfactory form of development having regard to the topography of the site.

- 32) All construction activities, tree protection, access facilitation pruning and pre-emptive root pruning shall be carried out in accordance with the approved recommendations of the submitted Arboricultural Report and Impact Assessment Report produced by Fellgrove dated March 2022,] unless the local planning authority gives written consent to any variation.

Reason: In the interests of landscape, visual impact and amenity of the area and to ensure a satisfactory appearance to the development

- 33) The development shall be carried out in accordance with the recommendations of the submitted Flood Risk Assessment Parts 1 & 2 produced by Herrington Consulting dated September 2023.

Reason: To safeguard future occupants of the application site from flood risk.