

40 extra care apartments at (former) Newington Primary School Infants Site, Melbourne Avenue, Ramsgate – TH/09/122

A report by Head of Planning Applications Group to Planning Applications Committee on 8 December 2009.

Application by Kent County Council's Adult Social Services Directorate for outline planning permission for 40 extra care apartments for the elderly including 20 one-bed apartments, 20 two-bed apartments, residents communal areas, staff facilities, car parking and internal access arrangements at (former) Newington Primary School Infants site, Melbourne Avenue, Ramsgate – TH/09/122.

Recommendation: Outline planning permission be granted subject to conditions

Local Member(s): Mr. J. Kirby & Mrs. E. Green

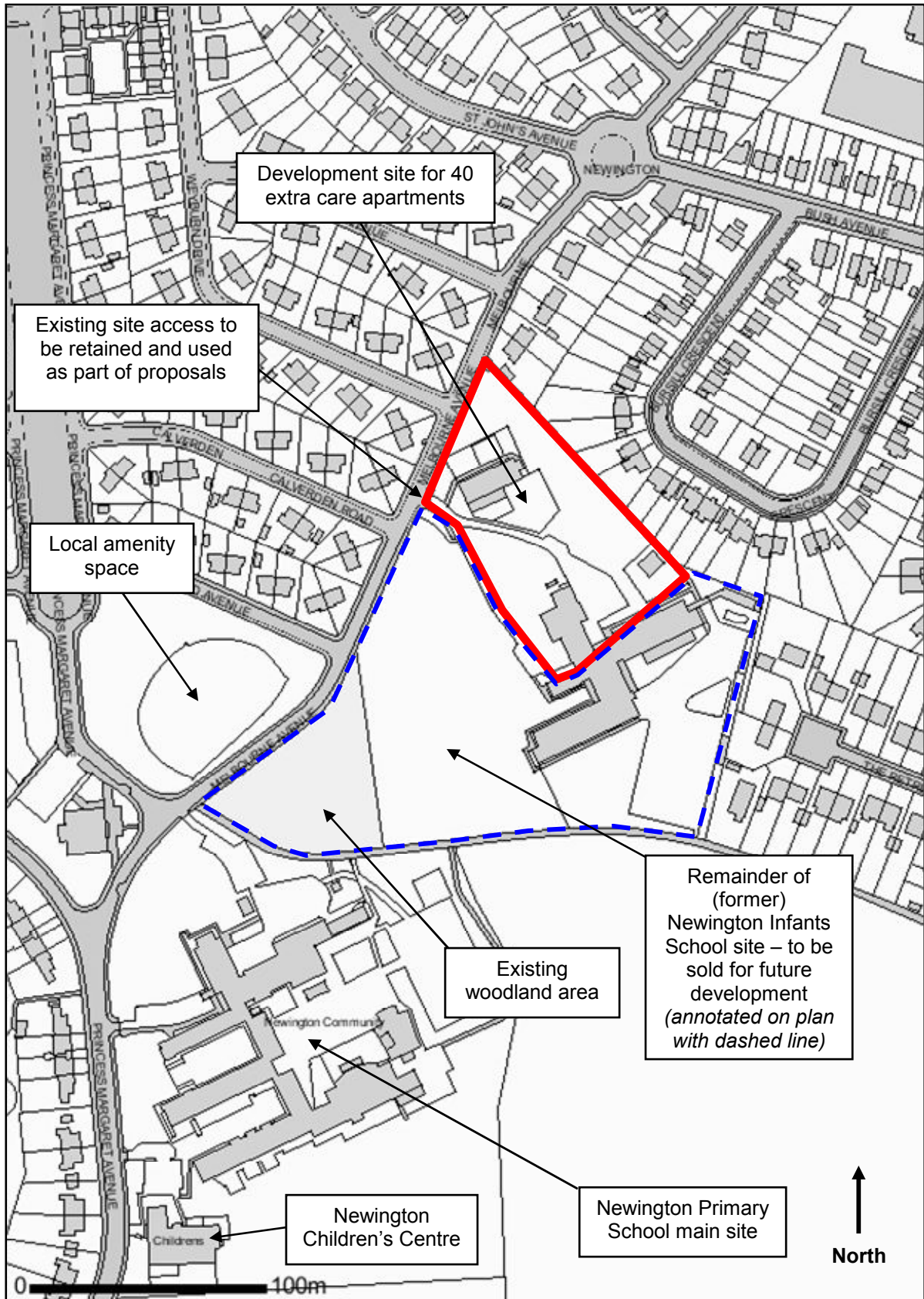
Classification: Unrestricted

Site

1. The application site comprises the grounds of the former Newington Primary School Infants site and is now a large plot, of approximately 2.58 hectares of disused land, since the amalgamation of Newington Infants and Newington Primary Schools onto one site to the immediate south west of this application site. The original school and nursery buildings remain on site with boarding to the windows and doors, and the boundary of the site is delineated by secure weld-mesh galvanised security fencing. Newington itself lies to the north west of Ramsgate. It comprises a large traditional appearance former Local Authority housing estate with the residential properties in the surrounding area mainly comprising two-storey houses with a mid-height tower block being visible in the distance from within the former school site.
2. The site location plan, identified on page D2.2, shows the totality of the development site and indicates the existing pattern of buildings within and surrounding the site. It is noted that the former school buildings are located to the north-east of the site, with open space, mainly grassed with some hardstanding to the east and south-west of the buildings. As previously mentioned, the site occupies an area of some 2.58 hectares, including a woodland area of approximately 0.32 hectares to the far south-western corner of the site. Given the extent of the site, the current land owners (Kent County Council) intends to sell off a large proportion of the site for residential dwellings. The remainder of the site, an area of approximately 0.71 hectares located on the north-eastern corner of the former school site, is intended to be redeveloped as part of this outline scheme to provide 40 extra care apartments. This area is now referred to as "*the site*" for the purposes of this outline planning application.
3. The site to be developed comprises a mix of open grassland space, part of the former Newington Infant School building and the entirety of the former Newington Children's Centre building. A tree survey received with the application indicates that there are 87 trees on the former school site (excluding the wooded area to the far south-western corner of the site) of varying age and arboricultural classification, with 9 of those located within, or in close proximity to the development site. Two oak trees to the front of the proposed care apartments which provide high landscape value have recently been protected by Tree Preservation Orders served by Thanet District Council. Both of these trees would be protected during the course of the proposed development, together with 6 other trees located within or immediately adjacent to the development site. The tree survey which accompanies the application indicates that only one tree, a

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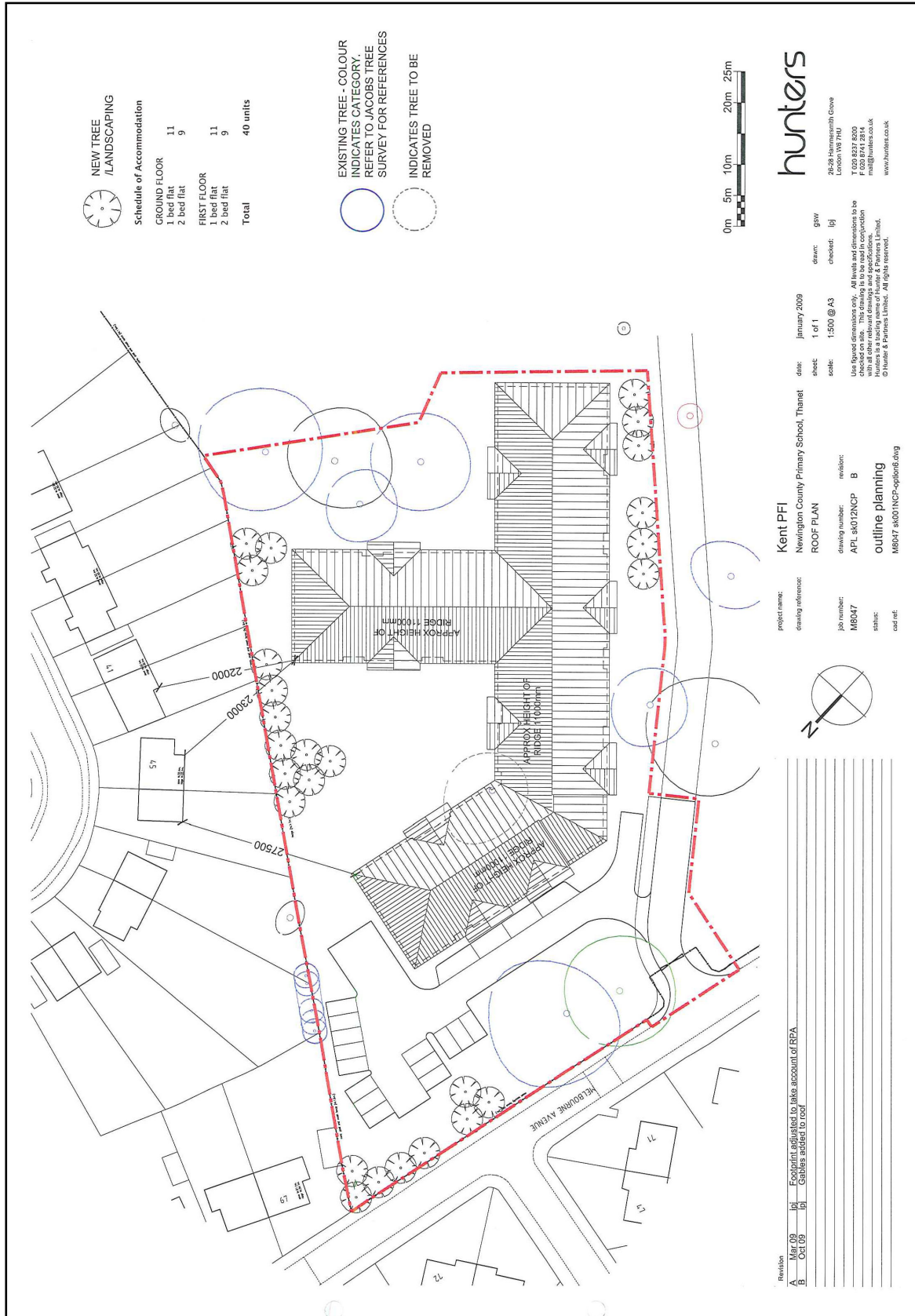
Existing Site Location Plan



Site Location Plan – (former) Newington Primary School Infants Site
Scale 1:2500

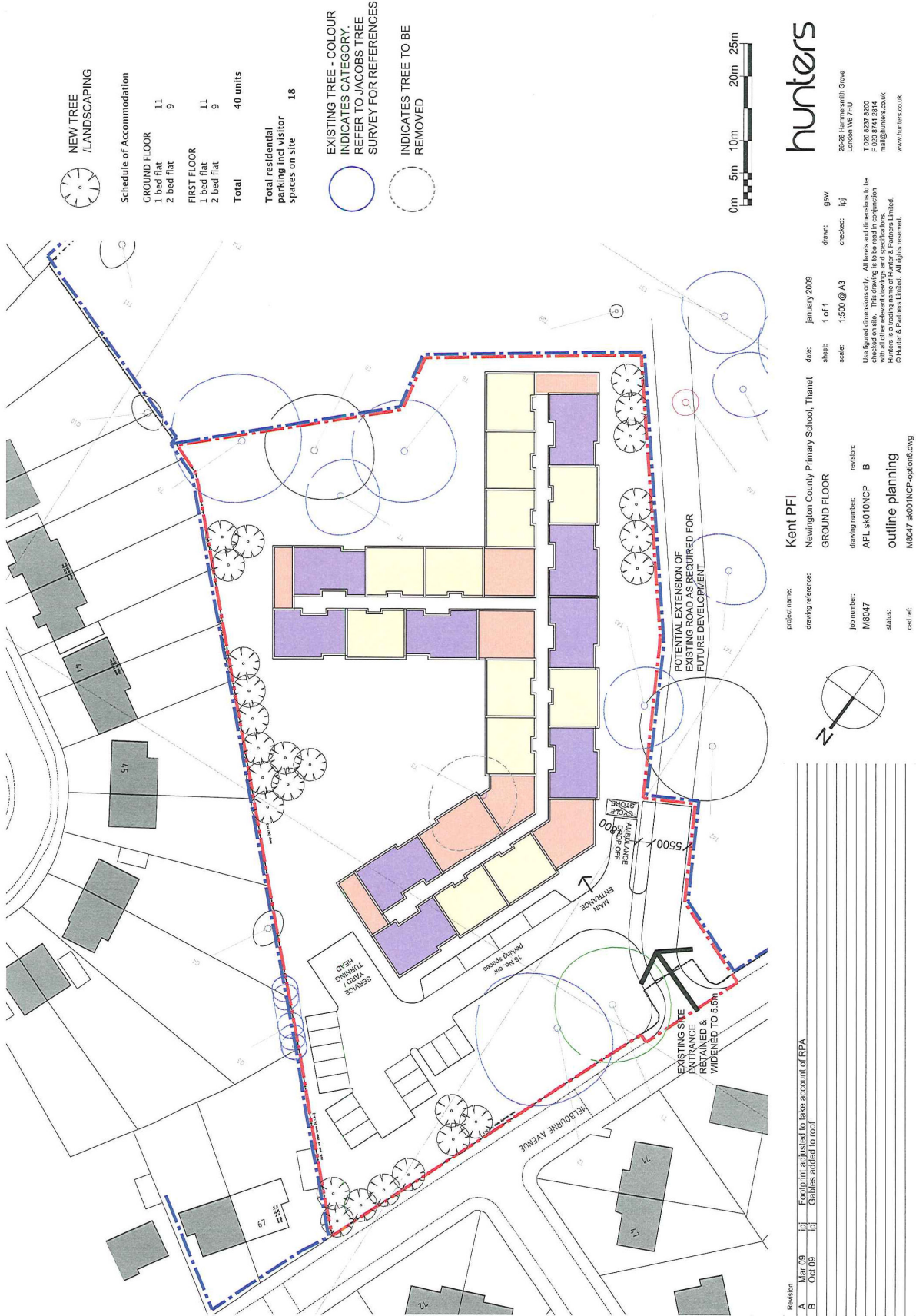
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Proposed Site Plan



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Proposed Ground Floor Plan

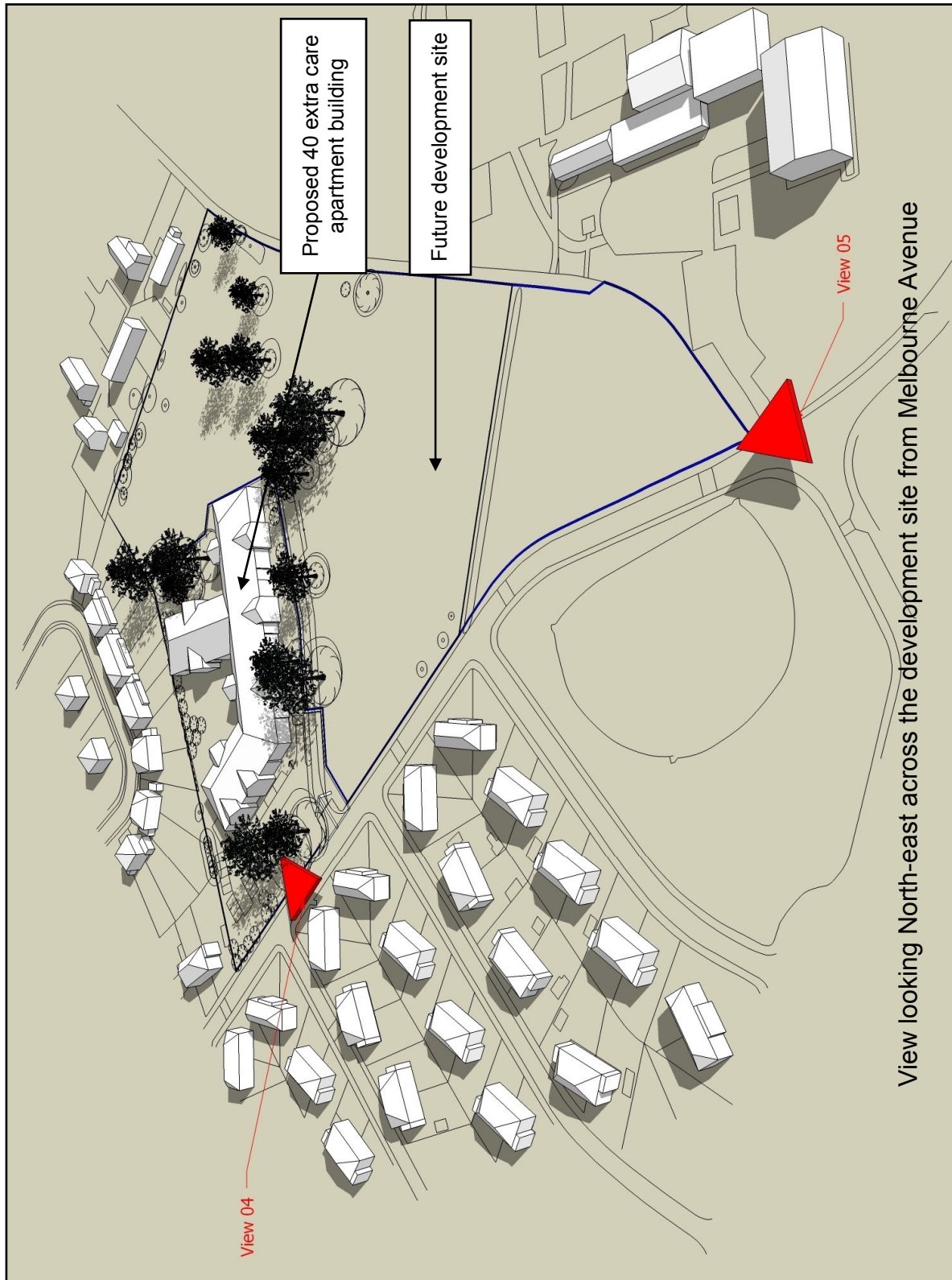


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Item D2

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Perspective view of proposed care apartment building



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moderate quality alder tree would have to be removed to facilitate the proposed development.

4. The application site is mainly flat, rising by only 1 to 1.5 metres over 200 metres. The site is accessed off an existing vehicular access from Melbourne Avenue which leads off the main A256 (Haine Road) via either the B2050 (Manston Road) and Princess Margaret Avenue to the south of the site, or via Stirling Way to the north.
5. There are no specific Development Plan Policies identified in connection with the application site itself, although general policies are set out in paragraph (13) below.

Background

6. This outline planning application is one of a number of proposals being considered by the County Council, submitted on behalf of Kent Adult Social Services (KASS) to provide new and upgraded residential care accommodation across the county. Kent Adult Social Services is taking the lead in this countywide programme of Extra Care Housing, although it is very much in partnership with the Kent District Councils and a private sector partner, as yet to be identified. The first wave of Extra Care Housing is nearing completion, with new accommodation being provided on largely existing care home sites in Herne Bay, Hythe, Dover, Margate, Birchington, Broadstairs, Ashford, Maidstone and Dartford. Whilst these developments are being constructed and managed as part of a Private Finance Initiative, the sites are ones already within local authority ownership, either owned by the County Council or the local District Councils. Planning applications for these developments were considered by the County Planning Authority in 2006-7.
7. The latest wave of planning applications, most of which have now been determined by the County Planning Authority, have been made to establish if the relevant sites are considered acceptable in principle for supported housing. If the principle is established through the grant of outline planning permission, KASS aims to include this proposal within the next wave of the Excellent Homes for All Housing Private Finance Initiative (PFI). This initiative seeks to develop 228 apartments for vulnerable people in Kent including young people and the elderly. Outline planning permission is required on all of the sites across the County as a precondition to accessing Central Government consent for the PFI scheme to progress.

Proposal

8. This outline planning application has been submitted on behalf of Kent Adult Social Services (KASS) Directorate and falls to be determined by the County Planning Authority due to the Social Services aspect of the proposed accommodation. Outline planning permission is being sought to redevelop the former school site as an apartment building providing 40 extra care sheltered apartments with associated facilities for elderly people. The outline application includes details of the *layout* of the proposed development (including the number of apartments) and the means of *access* for consideration at this stage. Further details relating *scale*, *appearance* and *landscaping* are being reserved for future detailed consideration should outline planning permission be granted by the County Planning Authority.
9. The layout of the proposed apartment building indicates that it would be two-storey with a pitched roof. The application sets out details of the maximum height of the building at the ridgeline of the roof as 11 metres above ground level. The apartment building would

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include 20 one-bed apartments, 20 two-bed apartments, residents' communal facilities, staff facilities and associated car and cycle parking provision, creating a gross internal floorspace of approximately 4,200 square metres. The application includes details of the proposed means of access to the site, which seek to retain and upgrade the existing vehicular access way into the site dating back to the former school use, together with details of 18 new car parking spaces, a delivery drop off area and a cycle store. Beyond the limits of hardstanding and the physical building itself, the remainder of the site area is proposed to be landscaped to provide residents' amenity space. The application sets out details to retain and protect 8 out of the 9 trees on site; however detailed matters relating to the overall landscaping of the site are being reserved out for later consideration within this outline proposal.

10. The aim of the Excellent Homes for All programme is to provide improved and upgraded accommodation for those requiring an element of care in the county. In the main, this relates to elderly people but the degree of care needed varies greatly from those needing constant supervision to those who can largely live independently from care. The new accommodation being provided responds to these changing needs by providing a greater mix of living accommodation and personal space and facilities than the conventional old peoples' homes have hitherto provided. In particular, the developments provide a mix of individual apartments with modern amenities and to larger dimensions, rather than the earlier pattern of a series of bedrooms lining corridors with shared toilets and facilities. However, there would still be some communal spaces, as well as medical facilities, but these would be less of an institutional nature, including hairdresser's salons and fitness suites for the residents.
11. Under the circumstances, the nature of the development proposed requires the total demolition of existing school buildings from the site and the construction of wholly new facilities. The new building would also take the opportunity to address environmental performance measures, especially with regards to energy efficiency savings and thermal insulation as part of the design criteria.

Additional information provided by the applicant

12. In response to objections made by Thanet District Council during the consultation process, the applicant has amended the layout of the car parking arrangements to avoid any adverse impact on two significant oak trees (now both protected by Tree Preservation Orders) to the front of the site, together with providing further information and perspective views to support the design and overall layout of the proposed building form. The various changes are included within this report, and the current proposals plans are identified on pages D2.2 – D2.5.

Planning Policy

13. The key Development Plan Policies summarised below are relevant to consideration of the application:
 - (i) The adopted **South East Plan (May 2009)**:
 - Policy SP3** Seeks to focus development on urban areas to foster accessibility to employment, retail and other services, and avoid unnecessary travel.
 - Policy CC1** The principle objective of the Plan is to achieve and maintain sustainable development in the region.

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- Policy CC2** Seeks new development to mitigate and adapt to current and forecast effects of climate change.
- Policy CC4** The design and construction of all new development, and the redevelopment and refurbishment of existing building stock, will be expected to adopt and incorporate sustainable construction standards and techniques
- Policy CC6** Actions and decisions associated with the development and use of land will actively promote the creation of sustainable and distinctive communities.
- Policy T4** Local development documents should adopt restraint-based maximum levels of parking provision for non-residential development, reducing provision in locations with good public transport, and ensure the provision of sufficient cycle parking at new developments.
- Policy H4** Local authorities should identify the whole range of housing needs required in their areas working with adjoining local authorities where appropriate. Groups with particular housing needs include older and disabled people and others with specialist requirements.
- Policy H5** Seeks new housing to deliver a high quality of design to make good use of available land and encourage more sustainable patterns of development and services.
- Policy S6** The mixed use of community facilities should be encouraged by local authorities, public agencies and other providers, through local development documents and other measures in order to make effective use of resources.
- Policy BE1** Seeks new development to help improve the built environment with design solutions relevant to local character, distinctiveness and sense of place.
- Policy NRM1** Water supply and ground water will be maintained and enhanced through avoiding adverse effects of development on the water environment.
- Policy W2** Seeks to encourage sustainable design, construction and demolition.

(ii) The adopted 2006 **Thanet District Council Local Plan (Saved Policies)**:

- Policy H1** Residential development on non-allocated sites will be permitted only on previously developed land within built-up confines, unless specifically permitted by other Local Plan Policies
- Policy H11** In considering proposals for non-self contained residential accommodation account will be taken of the likely effect of the

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building use on the character and amenity of the locality resulting from noise, disturbance and visual impact together with the adequate provision for car parking and dustbin storage/refuse collection.

- Policy TR12** In new residential development, facilities for the secure parking and storage of cycles should be provided for.
- Policy TR16** Proposals for development will be expected to include satisfactory provision for the parking of vehicles (including service vehicles where appropriate).
- Policy D1** All new development is required to provide high quality and inclusive design, sustainability, layout and materials.
- Policy D2** Landscaping measures should be considered as part of any new development proposals.
- Policy HE11** Developers will be required to undertake archaeological assessments where required as part of the determination of new development proposals.
- Policy CF1** Planning permission will be granted for new community facilities if the proposals are not contrary to other Local Plan Policies and the community use and location are demonstrated as appropriate.

Consultations

14. **Thanet District Council:** initially objected to the proposal based on the proximity of the car parking layout adjacent to two significant oak trees *[note that this point of objection has since been overcome as a result of an amended car parking layout]* and regarding the 'bulk' of the building design.

The District Council maintains its objection relating to the design of the proposed care apartment building for the following reasons:

"Although the 2-storey nature of the development is considered to be acceptable, the siting of the building, including its shape and form, raises strong concerns. No details have been provided on the potential design of the development, but based on the footprint it would probably appear large in scale, and bland in design, with no visual breaks along the length of the building being provided. Unless indicative elevation plans can be submitted to prove the acceptability of this scheme, I would object to the siting and form of the proposed building".

Further discussions took place between the applicant, KCC planning officer and Thanet District Council planning officers regarding the proposed building design. Perspective drawings were submitted by the applicant (as shown on page D2.5) to further justify how the proposed scheme would fit into the wider surrounding residential context, however the District Council maintains its objection to the building design for the following reasons:

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“Following the submission of a pre-application plan for housing on the neighbouring site [i.e. the remaining part of the former Newington Infant School site] I am more concerned with the location of the proposed care building, as it will have a very poor relationship with the residential buildings. Really the site should have been looked at as a whole rather than one piece coming forward for development without consideration being given to how it will work with the adjoining site. Ideally the care apartments would look better if they were located to the rear of the site, due to the size of the block”

Divisional Transportation Manager: raises no objection to the proposed care apartments scheme, subject to the imposition of conditions covering the following aspects:

- details of construction vehicle loading/unloading and turning facilities to be agreed prior to commencement of the development;
- details of parking areas for construction vehicles to be agreed prior to commencement of the development;
- details of wheel cleaning facilities to be approved prior to commencement of development;
- permanent retention of vehicle parking spaces and loading/unloading area shown within application for the life of the site;
- details of cycle parking and storage measures to be agreed and implemented on site;
- removal of existing ‘School Keep Clear’ markings and associated signage prior to the use of the development commencing.

Environment Agency: has no objection to the proposed development, subject to the imposition of conditions on any outline planning permission granted covering: land contamination investigation, drainage, and the storage of fuel, oil and chemicals during construction operations.

The County Archaeologist: notes that the site has recently been subject to an archaeological desk-based assessment and an archaeological trial trench evaluation in connection with separate proposals, but that the desk-based work concluded that the site contained moderate to high potential for remains from most periods. Therefore, given that archaeological remains may be revealed during ground works, a condition securing an archaeological watching brief should be applied to any future outline consent.

County Council’s Landscape Consultant: notes that in principle the proposed apartments are suited to the site and surrounding townscape in terms of the size, scale and layout, and it is not envisaged that they would cause any significant adverse landscape/townscape or visual impact. It appears that only one alder tree would be removed to facilitate the development, which has been assessed as being of moderate quality and value. It is considered that the loss of this tree could be fully mitigated through new planting as part of a landscaping scheme. Conditions covering tree protection, full details of landscaping proposals and the use of external materials should be imposed on any future outline consent.

Local Members

15. The local County Members (at the time when the application was validated in February 2009), Mr. A. Poole and Mrs. E. Green, were notified of the application on 10 February 2009. Mr. J. Kirby has since replaced Mr. A. Poole as joint local Member for Ramsgate, and was recently notified of the application. No views have been received to date.

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Publicity

16. The application was publicised by the posting of a site notice at the main vehicular entrance to the site on Melbourne Avenue, a newspaper advertisement in the Isle of Thanet Extra, and the individual notification of 29 neighbouring residential properties.

Representations

17. I have received 1 letter of representation in respect of this application. The resident concerned sought further clarification on several matters relating to the application. A reply letter was sent on 27 February 2009 providing further clarification in response to their request.

Discussion

Introduction

18. The application seeks outline planning permission for 40 extra care apartments on the redundant former site of Newington Primary School. The development comprises a mix of 20 one-bed apartments and 20 two-bed apartments, together with residents' communal facilities, staff facilities and associated car and cycle parking to serve the building. The application is being reported for determination as a result of the planning objection by Thanet District Council in relation to the design of the proposed care apartment building, as summarised in paragraph (14) above. It is noted however that this outline planning application is only considering parameters relating to layout and access and that matters relating to scale, appearance and landscaping would be reserved by condition for later consideration.
19. In considering this proposal, regard must be had to the Development Plan Policies outlined in paragraph (13) above. Section 38(6) of the 2004 Planning and Compulsory Purchase Act states that applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore the proposal needs to be considered in the context of the Development Plan Policies, Government Guidance and other material planning considerations arising from consultation and publicity. The main issue to consider in this instance is whether the proposed development, particularly in terms of its proposed layout and means of access, is acceptable in the context of the surrounding residential area and in light of the concerns expressed from Thanet District Council.

Policy Context

20. Policies in the South East Plan (2009) generally promote sustainable development, sustainable design and construction and sustainable communities, as well as seeking to upgrade existing housing and address parking provisions. The whole programme of providing new sites or redeveloping existing ones to extend and improve accommodation for the elderly where there are local needs is entirely consistent with the objectives of Policies CC1, CC6 and H4, given that the proposals aim to upgrade the existing housing stock, to meet local community needs and to meet the specialist needs of those in the community not otherwise catered for by open market housing provision. Additionally, the proposed development would make best use of previously developed land by upgrading an existing and derelict community site rather than seeking fresh undeveloped land.

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21. Since this application is not a detailed one, it is not possible to fully assess the sustainability credentials of the proposed new buildings at this stage, but the applicants would be expected to achieve a Very Good BREEAM standard in terms of environmental performance in order to satisfy funding requirements. The application also broadly complies with the policy objective to ensure an appropriate level of on-site parking in accordance with Policy T4, and to address the reliance on personal transport through the provision of cycle facilities and the location of the development in a predominantly residential and community based area, served well by existing public transport facilities.
22. The Thanet Local Plan (2006) similarly promotes high quality design, new residential development in town centre sites served well by public transport, and the provision of appropriate levels of cycle and car parking facilities in Policies D1, H1, TR12 and TR16. There is also a general presumption to encourage the establishment of new community facilities within residential areas within Policy CF1. Whilst there is a presumption to seek high quality design and fully landscaped proposals as part of all new development proposals, it is recognised that this application is to establish the principle of care apartments at the site and matters relating to scale, appearance and landscaping are to be reserved for later consideration. Therefore I consider that the principle of the development is broadly in accordance with the general thrust of Local Plan Policies
23. Overall, I do not consider that the proposed redevelopment of part of the former school site as an alternative community facility (i.e. care facilities as opposed to educational facilities) fundamentally conflicts with any of the relevant Development Plan Policies, given that it clearly accords with the general thrust of the policy objectives.

Design and Layout Aspects

24. Members will note that the District Council has maintained an objection to the proposals on the basis of a lack of detail relating to the proposed building design. They have considered that should the County Planning Authority be minded to grant outline planning permission for this scheme, there is a strong potential for the proposed building to appear large in scale and bland in appearance. Whilst the view of the District Council is noted in this case, notwithstanding their views, the process of obtaining outline planning permission has been the standard approach adopted to KASS in order to meet the Private Finance Initiative funding requirements (i.e. funding for the schemes can only be allocated once the principle for development on a particular site has been established). Therefore, all of the current wave of Extra Care Apartments planning applications, and indeed the first wave, the majority of which are now complete, have followed the same *outline* planning application approach to establish the principle of development in the first instance. Such an approach is not unreasonable in this case.
25. I consider that the two-storey height element of the proposed Extra Care building is in general conformity to surrounding development in the Newington area. It is however noted that with the exception of the school to the south of the site, the majority of buildings in the locality consist of semi-detached former local authority dwellings. That said, the juxtaposition of the proposed building to the road frontage would effectively result in the main entrance being a focal point with blocks extending to either side of the main entrance way. Inevitably, given the length of the south-east elevation at some 70 metres long there is the potential for this elevation to appear bland in appearance. The perspective views (shown on page D2.5) issued by the applicant indicate that it is the intention for the main elevations to be broken up with the use of gable features together with a mix of varying materials and finishes. Whilst the overall design of the building is only in block form at present, on the basis that the *appearance* is not a matter for

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consideration at this stage, I would expect any future 'reserved matters' application to sufficiently address the elevational detail of the building through the use of a mix of materials and building forms to ensure that the design does not appear bland or unduly bulky. Under the circumstances, it is not possible to presume against the proposals at this stage on the basis of details of appearance and scale that have not yet been submitted.

26. In addition, given the extent of the site to be developed for Extra Care Apartments (some 0.71 hectares), and the existing constraints such as the need to retain existing trees, I consider that without the need for additional land-take or to raise the building by another storey at least in part, that the development could not accommodate 40 apartments in any better form. As previously noted, I understand that it is intended that the County Council will dispose of the remainder of the site for future development. The applicant for these current proposals, KASS, has indicated that it is therefore not possible to entertain considerations such as an alternative position of the proposed care apartment building within the totality of the land currently held by the County Council. In any case, I can see no significant benefits to locating the care apartment building elsewhere within the wider site owned by the County Council which could offer enhanced visual benefits.
27. Thanet District Council has considered it unfortunate that the site has not been looked at as a whole in terms of a master plan for its future redevelopment. Whilst I share this view, future proposals for the remainder of the site are outside the control of the County Planning Authority, on the basis that the likely future development would comprise housing, for which the planning responsibility lies with the District Planning Authority. In addition, at the time of considering these proposals there is no formal planning application being considered by the District Council for the redevelopment of the remainder of the site. In the event that the care apartment scheme receives outline planning permission, any future development on the adjacent site would need to take into consideration the proposals within this current application. Similarly, should any future development come forward for the remainder of the site before any reserved matters application is submitted (in the event that planning permission is granted) then clearly the developer of the care apartment building would need to take into consideration any development approved by the District Council for the remainder of the site.
28. I therefore consider that the proposed layout would respect the context of the site, would not result in an unacceptable impact on residential amenities of nearby dwellings, and that the maximum scale of the development would be proportionate to the suburban character. In my opinion the layout of the development is acceptable in the context of the Development Plan Policies.

Access Issues

29. Members will note that the County Council's Divisional Transportation Manger has not raised any objections to the proposals, subject to the imposition of a number of measures to control the development during construction activities and subsequent use, as set out in paragraph (14) above. I am satisfied on the basis of the professional advice received, and having agreed a revised car park arrangement with the applicant and the District Council in order to protect the two significant oak trees to the front of the site, that the access arrangements submitted for consideration as part of these outline proposals are acceptable. Therefore, subject to the imposition of the conditions as set out in the recommendation in paragraph (35) I would not raise an objection to the proposed means of access.

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Landscaping

30. Whilst the application seeks to reserve detailed consideration of landscaping until a later stage, it is noted that the site includes a number of trees that are considered to have medium to high quality and amenity value to the local area to have long term value, warranting protection. The application seeks to retain the vast majority of the trees on site (8 out of the 9 are to be protected) and is supported by a Tree Survey Report. The majority of the trees appear to be deciduous and as such any mitigation offered in terms of screening and softening of the site is reduced during the winter months when they are not in leaf.
31. During consideration of the proposal, the applicant amended the layout of the car park, to move the extent of the hardstanding away from the root protection zones of two oak trees to the front boundary of the site with Melbourne Avenue. The building layout has been designed to retain as many existing trees on site to soften and screen views into and out of the site. This mitigation measure, together with a well thought-out landscaping scheme in my opinion would significantly help to mitigate the impact of any re-development of the site.
32. I therefore do not consider that there are grounds to presume against the proposed redevelopment of the site on the basis of the impact on trees, subject to the inclusion of conditions seeking to protect trees to be retained, together with the need for a detailed landscape scheme for planting to maintain and enhance the screening available on site, along with details of any further improvements to the respective boundaries.

Archaeology

33. Members will note that the County Archaeologist has suggested that previous archaeological investigation at the site demonstrated a moderate to high level of archaeological activity. Therefore it is possible that the proposed development works may disturb archaeological remains, and therefore a condition securing an archaeological watching brief should be imposed on any outline consent. I consider that this approach is appropriate and proportionate to the development being proposed and furthermore is in accordance with Policy HE11 of the adopted Local Plan.

Conclusion

34. In conclusion, having regard to Development Plan Policies and material planning considerations, I consider that the use of part of the former school for a residential care facility is acceptable as a community facility in principle. Furthermore, I consider that this use would fit in well with the existing residential housing in the immediate locality, increasing the range of accommodation available to the local community. The proposal would use an existing brownfield location within an urban area that has good access to public transport and local services. Whilst it is noted that an objection is maintained by the District Council regarding the proposed building's design, it is considered that such matter can only be fully explored at the reserved matters stage. That said, I would fully intend to advise the applicant by way of an informative to consider the use of a suitable mix of materials for the external building elevations together with varying building forms such as gable features to avoid any bland and unduly bulky elevations. I am therefore of the opinion that the development as proposed is in accordance with general principles of the Development Plan Policies, and subject to conditions and an informative including those set out below, recommend that outline planning permission be granted.

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Recommendation

35. I RECOMMEND that OUTLINE PLANNING PERMISSION BE GRANTED, SUBJECT TO conditions, including amongst others, conditions to cover the following aspects:

- standard time limit for an outline permission;
- the submission of reserved matters relating to *scale, design and landscaping*;
- the development to be carried out in accordance with the permitted layout and access arrangements;
- the height of the building not to exceed those set out in the development hereby permitted (ridge-height not exceeding 11 metres);
- details of proposed site levels to be submitted for approval;
- submission of a site investigation and verification plan into risks associated with contamination of the site and measures to be taken if contamination not previously identified on site is found;
- protection measures for trees to be retained;
- details of all hard landscaping including fencing proposed on site;
- details of foul and surface water drainage;
- details of pedestrian access arrangements on site;
- submission of a code of practice covering construction, including measures to mitigate for noise and dust generated by the development and the hours of operation during construction;
- details of construction vehicle loading/unloading and turning facilities to be agreed prior to commencement of the development;
- details of parking areas for construction vehicles to be agreed prior to commencement of the development;
- measures to ensure no mud is deposited on the public highway;
- permanent retention of vehicle parking spaces and loading/unloading area shown within application for the life of the site, including the provision of vehicle parking and cycle parking spaces prior to first occupation;
- removal of existing 'School Keep Clear' markings and associated signage prior to the use of the development commencing.
- no external lighting to be installed without prior approval;
- the use of the building be restricted solely for the use applied for; and
- the implementation of an archaeological watching brief.

I FURTHER RECOMMEND THAT AN INFORMATIVE be added to the decision notice including:

- drawing the applicant's attention to the concerns of the District Council and the need to ensure that the detailed design minimises the opportunities for a bland and bulky visual appearance of the Extra Care Apartments through the use of a mix of varying materials and building forms to break up long elevations and to consider the inclusion of gable features.

Case officer – Julian Moat	01622 696978
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Background documents - See section heading
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