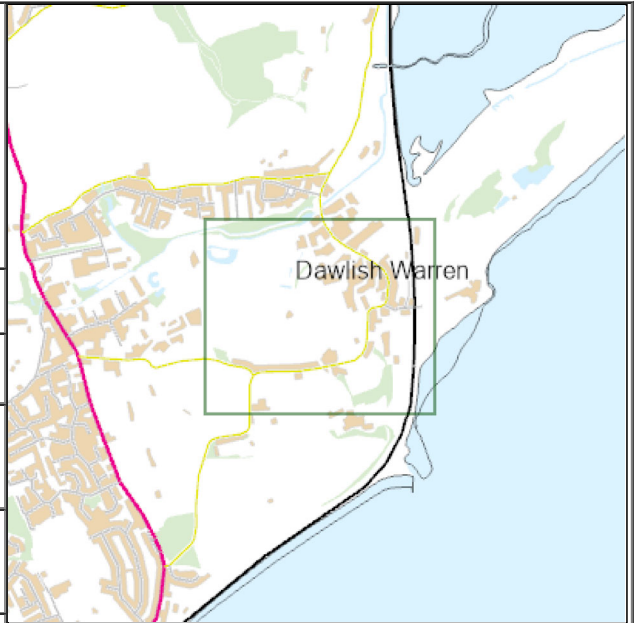




Planning Committee Report

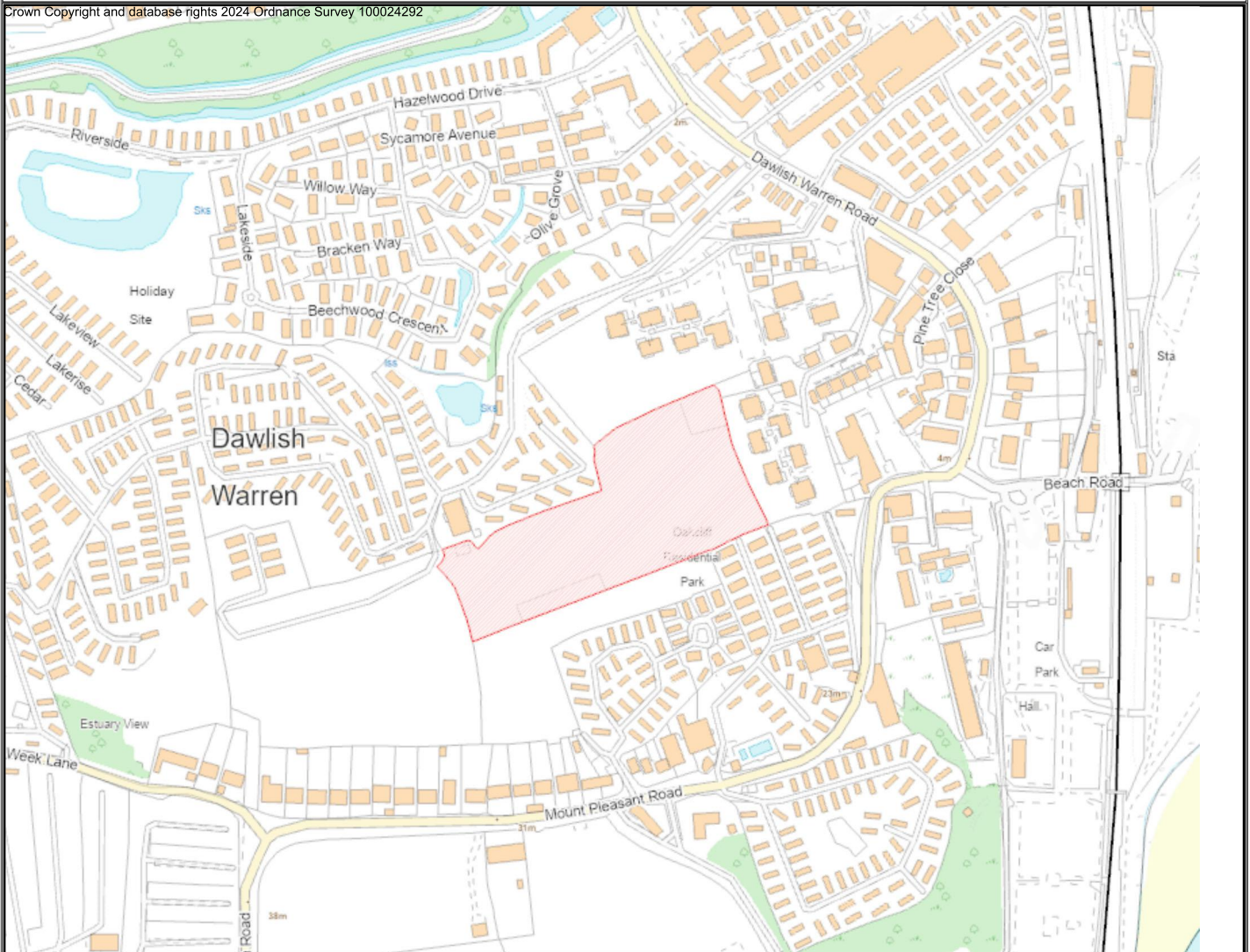
Chairman: Cllr Colin Parker

Date	22 October 2024
Case Officer	Luke Ashley
Location	Golden Sands And Peppermint Park Caravan And Chalet Park Warren Road Dawlish Warren Devon EX7 0PQ
Proposal	Siting of 25 timber camping pods, gravel foundation pads, footpaths and associated facilities (retrospective)
Applicant	Park Holidays UK Ltd
Ward	Dawlish North East
Member(s)	Cllr Linda Goodman-Bradbury, Cllr Rosie Dawson, Cllr Martin Wrigley
Reference	23/01593/FUL



[Online Details and Documents](#)

RECOMMENDATION: PERMISSION GRANTED



1. REASON FOR REPORT

This has been called in by Dawlish Town Council for the following reasons:

- The location is in open countryside outside of the settlement limit.
- It is in a critical drainage area.
- The proposal has already been done without permission.
- There is an inherent fire risk with the gas cylinders (and the only way out is past these gas cylinders).
- The road is unsuitable.
- The road is unpassable for emergency vehicles.
- The land is set aside for biodiversity.
- It is overdevelopment of the site.

2. RECOMMENDATION

PERMISSION BE GRANTED subject to:

- a. the applicant entering into a S106 agreement to rescind the previous 2014 permission; and,
- b. the following conditions:
 1. The development hereby permitted shall be retained in accordance with the application form and the following approved plans/documents:

Date Received	Drawing/reference number	Description
25 Aug 2023	15/016-03 REV 1	Tree Constraints Plan
25 Aug 2023	SHF.201.218.ENZ.XX.00.DR.L.45.001 REV PL01	Planting Plan
25 Aug 2023	01/500/GP-001 REV A	Sunflower Pod
16 Feb 2024	201.218.ENZ.XX.00.DR.L.00.001 REV PL02	Red Line Plan (site location plan)
16 Feb 2024	SHF.201.218.ENZ.XX.00.DR.L.00.002 REV PL	Site Cross-Sections
16 Feb 2024	000.000.ENZ.XX.00.DR.L.00.003 REV PL01	Existing Site Layout Plan
2 Oct 2024	SHF.201.218-ENZ-ZZ-CA-D-0001 C02	Info Drainage
2 Oct 2024	SHF.201.218-ENZ-XX-DR-D-0001 C02	Surface Water Drainage Strategy

REASON: In order to ensure compliance with the approved drawings.

2. Notwithstanding Section 55(2) of the Town and Country Planning Act 1990 and/or the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modification), no additional exterior lighting shall be installed on

the buildings or elsewhere on the site without the express prior approval in writing of the Local Planning Authority.

REASON: To safeguard foraging paths for legally protected bats, including Greater Horseshoe Bats from the South Hams Special Area of Conservation which are known to be particularly light sensitive.

3. The Planting Plan, as detailed within the approved document Ref - SHF.201.218.ENZ.XX.00.DR.L.45.001 REV PL01 shall be implemented so that planting is carried out no later than the first planting season following this decision. All planted materials shall be maintained for five years and any trees or plants removed, dying, being damaged or becoming diseased within that period shall be replaced in the next planting season with others of similar size and species to those originally required to be planted unless the council gives written consent to any variation.

REASON: In the interests of biodiversity enhancement as required by policy EN8.

4. The timber camping pods shall be occupied for holiday purposes only, occupied only between between 1st March and 14th February the following year (inclusive) and shall not be occupied as a main place of residence. The owner shall maintain an up-to-date register of the detail of all occupiers, including their names and main home addresses, of the holiday units on the site and shall make it available for inspection at all reasonable times by the local planning authority.

REASON: To ensure the holiday accommodation is not used for permanent residential accommodation and is restricted to the same months as the wider park.

5. Within 1 month from the date of this approval, an Operational Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Operational Waste Management Plan shall specify details of:
 - A scheme for the recycling/disposal of onsite waste.
 - Waste collection schedule.
 - Waste storage and collection methods.
 - Waste storage capacity.

The approved Operational Waste Management Plan shall then be implemented as part of this scheme and remain operational for the lifetime of the development hereby approved.

REASON: To ensure that appropriate waste management arrangements are in place and to comply with Local Plan Policy EN8

6. Within 1 month of the permission being issued, a detailed design for the surface water drainage system (up to the 1 in 100 year +45% allowance for climate change rainfall event) shall be submitted to and agreed in writing by the Local Planning Authority. Once agreed, drainage shall be installed in accordance and maintained thereafter.

REASON: The above conditions are required to ensure the proposed surface water drainage system will operate effectively and will not cause an increase in flood risk either on the site, adjacent land or downstream in line with SuDS for Devon Guidance (2017) and national policies, including NPPF and PPG.

7. Within 1 month of the date of this permission, a scheme for electric car charging shall be submitted to and agreed in writing by the Local Planning Authority, to include a timetable for implementation. Once installed, the charge points shall be maintained and retained thereafter.

REASON: To reduce reliance on fossil fuel based transport.

3. DESCRIPTION

3.1.1 The application site comprises an irregular shaped area of land, around 0.67ha in size, on part of a field where consent was granted in 2014 for touring caravans and camping, together with adjacent land for recreational use in association with the holiday park. It sits within the well-established Golden Sands Holiday Park (formerly Peppermint Park) in Dawlish Warren, outside of the settlement limit, within the Dawlish Critical Drainage Area and Dawlish Warren Special Area of Conservation/Exe Estuary Special Protection Area zones.

3.1.2 The site is surrounded by development on all sides; the Park itself to the north, residential and holiday properties to the east and south; with Lady's Mile Holiday Park to the southwest. Development on the Park comprises either static caravans or more modern lodge style structures; the Park is permitted to be occupied between 1st March and 14th February the following year (granted under 16/02739/FUL)

3.1.3 The red line area of the site itself, where the pods are located, is largely flat due to grassed terracing works carried out under the 2014 permission, but the adjacent land rises steeply to the south, towards the rear gardens of the properties in Mount Pleasant Road which are set on much higher ground; these are generally divided from the site by trees, hedging and shrub belts.

3.1.4 The development subject to this application is retrospective; it is stated that the first 5 pods were installed in 2018, 10 more were installed in 2019 and the final 10 in 2022. Access to the pods is via the existing park road, unchanged from that utilised to implement the 2014 permission. Parking is provided informally at the side of each pod, and occupants use the nearby toilet and shower block facilities, just as they did when the field was used by tents and touring caravans.

3.2 Site History

- 16/02739/FUL - Use of land for the siting of static caravans, tourers and including ancillary buildings, for holiday use between 1 March and 14 February (inclusive).
- 14/00874/FUL- Use of land for the stationing of touring caravans for holiday purposes, construction of road, hardstandings and associated facilities.
- 00/03511/MAJ – Change of use from stationing of tents and tourers to static caravans.
- 82/02527/COU – Use of land to site 192 caravans and tents.

- 77/01981/COU – Caravan and tent site.
- Various applications have also been approved for works to TPO trees.

3.3 Principle of the development/sustainability

3.3.1 The site is in the countryside in terms of planning policy, but is part of an established tourism site, with built development on all sides.

3.3.2 Policy S1 “Sustainable Development Criteria” is the overarching policy, requiring development to not impact on road safety, environmental pollution, residential amenity, landscape, biodiversity and so on. Policy S22 limits development in countryside locations, although tourist uses are listed as an acceptable use. Policy S12 (Tourism) states that the Council will promote a growing, sustainable tourism sector, and support proposals to lengthen the tourism season and encourage higher spending by visitors to support the retention of existing tourist accommodation and attractions which contribute to the local economy. Policy EC11 (Tourist Accommodation) also states that to support the sustainable expansion of the tourism industry additional tourist accommodation including self-catering and serviced accommodation, campsites and caravans will be acceptable in principle within or adjoining the settlement limits and elsewhere where it expands or improves existing tourist accommodation locations. To a degree, Policy S17 “Dawlish” is also relevant in so far as the aim for Dawlish to regenerate a premier year-round visitor resort.

3.3.3 The accompanying text within the TLP (paragraphs 3.17 – 3.18) sets out that, whilst the tourist economy is a relatively small direct element of local employment, it provides additional visitors to local retail and other services and therefore indirectly supports a significant amount of local employment. Therefore, it is important that planning policies support its sustainable expansion rather than inhibits its growth unnecessarily. In the open countryside there are a wide number of potential tourist businesses that can contribute to the area’s economy and meet sustainable development requirements.

3.3.4 This application effectively replaces the touring caravans and camping pitches approved under 14/00874/FUL. As the site does not cover that entire area, meaning both permissions could be implemented at the same time, the applicant has indicated a willingness to enter into a legal agreement to rescind that earlier permission should this application be approved.

3.3.5 As the site lies outside of any settlement limit and in the countryside in terms of planning policy, despite being surrounded by development, it is therefore not a location where policy would support full-time residential properties. A condition is therefore imposed to limit the occupation of the pods to holidays only and to follow the wider permission which is limited to the same occupancy period (1st March to 14th Feb the following year)

3.3.6 The principle of this development has policy support and is therefore considered acceptable.

3.4 Highway Safety

3.4.1 Policy S9 requires safe access, promotes non car transport and electric car charge points, amongst other criteria.

3.4.2. Concerns have been raised that the access is unsuitable and will cause further congestion, with a danger of nearby gas tanks. As noted by the County Highways Officer, the access is already permitted and used by site visitors. If anything, this development will result in less vehicles using the access because it replaces the touring caravans with pods; tourers will no longer be towed to site, and it is considered the access is acceptable.

3.4.3 The site is well located in relation to the local transport in the area, both bus routes and the train line, giving guests opportunities to travel by other means than private cars. A condition is imposed for electric charge points to be provided. The proposal is considered acceptable in regard to Policy S9, Sustainable Transport.

3.5 Landscape Character

3.5.1 Policy EN2A requires development to protect and enhance the landscape.

3.5.2 The site is well contained, surrounded by built form on all sides, and on relatively low lying land. The pods are sited on the lower part of the field and are viewed against the backdrop of the existing holiday park, screened to a degree by existing planting, with more tree planting proposed as part of this application; a planting plan has been submitted indicating 28 trees will be planted around and between the pods, which will help to screen them from nearby vantage points, and soften the view from/to residential properties to the south, as well as proposing several patches of wildflower planting totalling 765m² which will provide biodiversity enhancements.

3.5.3 A condition is imposed to secure this planting and it is considered the proposal is not harmful to the local landscape and meets the aims of EN2A.

3.6 Biodiversity

3.6.1 Local Plan Policies EN8, EN9, EN10 and EN11 all seek to protect and enhance the area's biodiversity interests.

3.6.2 The application is accompanied by an Ecology Statement, which notes the site is largely closely managed grassland with areas of scrub, bramble and hedgerows. The installation of the pods has resulted in a loss of 0.16 ha of the grassland. Due to the intense maintenance of the field, it was considered the development is unlikely to be detrimental to any protected species which might use the site; no signs of badgers was noted and bat usage is likely to be for foraging.

3.6.3 In terms of individual species, the Biodiversity Officer has raised no concerns, given the previous use of the land for tourism purposes. The additional planting is welcomed and a condition is imposed to prevent the installation of further lights on the pods or the site itself.

3.6.4 The site is within 350m of the Exe Estuary SPA/Ramsar Site and Dawlish Warren SAC. As mitigation to offset an increase in recreational impact on these areas, a financial contribution would normally be required. The Biodiversity Officer has however confirmed that, given a payment has already been paid under the 2014 permission for a greater number of units and given that any difference in amounts payable is considered to already have been used in mitigation for the approx. 10 years of use as a touring caravan park, the calculated payment amounts to zero. This zero payment is however dependant upon the 2014 consent being rescinded via legal agreement, as previously discussed.

3.7 Trees and Hedgerows

- 3.7.1 EN12 requires development to protect and enhance trees and hedgerows, taking new opportunities for planting.
- 3.7.2 A Tree Constraints Plan was submitted and indicates the pods have been placed outside of root protection areas (RPAs) of surrounding trees and hedgerows. The access does run through RPAs of the trees adjacent to the toilet block but it was already in place prior to the installation of the pods.
- 3.7.3 The Biodiversity Officer raised a concern that works appeared to have been carried out to TPO'd trees. Upon a review of the site history, numerous consents have been granted to works for trees across the site. Officers have no evidence that any unauthorised tree works have taken place.

3.8 Drainage and Flood Risk

- 3.8.1 Local Plan Policy EN4 Flood Risk requires a sequential approach to development; whilst being in a critical drainage area, the site is in Flood Zone 1, the lowest risk area.
- 3.8.2 The flood risk posed by this scheme has been scrutinised by Devon County Council as Lead Local Flood Authority (LLFA) and the applicant has provided further information to address the concerns that infiltration testing appears to indicate the field is not suitable for infiltration. It was also noted by the LLFA that that the access drive into the site should be constructed from permeable materials to increase infiltration rates, these being up to the 1 in 100 year +45% allowance for climate change rainfall events, a factor that has now been incorporated into the applicant's climate change allowance modelling.
- 3.8.2 Whilst the LLFA raise no objection, they have requested a condition be imposed to ensure drainage is with regard to the 1 in 100 year +45% allowance for climate change rainfall event.
- 3.8.4 In relation to foul drainage, the existing toilet and shower block will be used by occupants; this presents an acceptable solution.
- 3.8.5 The objections raised are noted, but it is considered that if there were any flooding, the Park itself would be affected given the lie of the land, not neighbouring properties and in the absence of any objection from the LLFA, the application is considered compliant with Policy EN4.

3.9 Residential Amenity

- 3.9.1 Local Plan Policy S1 requires development to take account of its impact upon existing residential amenity, referring in particular to privacy, outlook, natural light and security, as well as any environmental impacts it might have such as noise, smell, dust and so on.
- 3.9.2 The site lies around 80m from the nearest residential garden boundaries in Mount Pleasant Road to the south and approximately 100m from the properties themselves. Concerns have been received that the pods are negatively impacting on amenity by light, noise and so on, as well as visibility.

3.9.3 That guests can be seen in the field is not a material planning consideration and in terms of guests being able to see into the residential properties, it should be remembered that these sit on considerably higher land; no additional views can be gained from this proposal that could not occur from the extant 2014 permission or any person using the fields whilst staying in the wider Park.

3.9.4 The concerns raised have been noted, but taking the extant consent into consideration, mindful this permits a greater number of “units” with the lie of the land (the residential properties sit on much higher land; the difference in height between the access road and southern most boundary is around 12m) and the separation distance, it is not considered that any impacts that would occur would be so great to warrant refusal on that basis.

3.10 **Other Matters**

3.10.1 The comments made regarding works taking place without permission cannot be taken into account; the application must be determined in line with local and national policies.

3.10.2 Matters of site management, or a lack of, are also not matters that the planning system can address. Site Licensing and Environmental Health legislation are the appropriate mechanism to address these. This also applies to the concern about gas tanks, which would have already been in place when the previous consent was granted.

3.10.3 The comments of the Town Council are noted. The tourism use of the site is however already controlled through the founding planning permission, and this is reinforced through this consent.

3.11 **Conclusion**

3.11.1 Objecting comments have been noted, however, given the extant permission that exists on the site, the topography of the land and nature of the development which will bring economic benefits to the local area, any limited harm that might result is not considered to outweigh the benefits the proposal would bring.

3.11.2 As discussed above, the applicant has addressed consultee concerns, proposal is policy compliant and therefore approval is recommended.

4 **POLICY DOCUMENTS**

Teignbridge Local Plan 2013-2033

S1A Presumption in favour of Sustainable Development

S1 Sustainable Development Criteria

S2 Quality Development

S6 Resilience

S7 Carbon Emission Targets

S9 Sustainable Transport

S12 Tourism

S17 Dawlish

S22 Countryside

EC11 Tourist Accommodation

EC12 Tourist Attractions
EN2A Landscape Protection and Enhancement
EN3 Carbon Reduction Plans
EN4 Flood Risk
EN8 Biodiversity Protection and Enhancement
EN9 Important Habitats and Features
EN10 European Wildlife Sites
EN11 Legally Protected and Priority Species
EN12 Woodlands, Trees and Hedgerows

Teignbridge Local Plan 2020-2040 (emerging Local Plan):

Teignbridge Local Plan 2020-2040 was published on 14 March 2024 and has been submitted for public examination. The National Planning Policy Framework sets out that decision-makers may give weight to relevant policies in emerging plans according to their stage of preparation, the extent to which there are unresolved objections to relevant policies, and their degree of consistency with policies in the National Planning Policy Framework. The following emerging policies are considered relevant to the proposed development:

GP1: Sustainable Development
GP3: Settlement Limits and the Countryside
GP5: Neighbourhood Plans
GP6A: Open Space and Recreation Facilities
GP6B: Built Facilities
GP7: Infrastructure & Transport Networks
CC1: Resilience
CC2: Energy and Carbon Statements
CC4: Sustainable Transport
CC5: Renewable and Low Carbon Energy Generation
DW1: Quality Development
DW2: Development Principles
DW3: Design Standards
EC1: Business Development
EC6: New Tourist Accommodation and Attractions
EC7: Static and Touring Caravan Sites
H12: Residential Amenity
EN4: Landscape Protection and Enhancement
EN6: Flood Risk and Water Quality
EN8: Light Pollution
EN10: Biodiversity and Geodiversity
EN11: Important Habitats and Features
EN12: Legally Protected and Priority Species
EN13: European Wildlife Sites
EN14: Exe Estuary and Dawlish Warren
EN15: South Hams SAC
EN16: Trees, Hedges and Woodlands

National Planning Policy Framework

National Planning Practice Guidance

5 CONSULTees

Environmental Health – No response received.

Biodiversity 26th March 2024 - Content to accept the proposal for 14/00874/FUL to be rescinded and that the HRA payment already made for 14/00874 shall cover the alternative holiday use proposed under this current consent (23/01593/FUL).

- 23/01593/FUL (25 camping pods classed as self-catering units) would need to pay £14,339.00 HRA contribution.
- 14/00874/FUL (58 touring caravans) paid a £15,861.26 HRA contribution. (The difference of approx £1,500 is considered to already have been used in mitigation for the approx. 10 years of use as a touring caravan park.)

9th October 2023: Site is within 350m of the Exe Estuary SPA/Ramsar site and Dawlish Warren SAC. A Habitats Regulations Contribution is therefore required towards mitigation of in-combination recreation impacts on these European wildlife sites. Without this, planning permission must not be granted.

The proposed planting is welcomed.

The northern boundary of the red line site is within an Area TPO (E2/29/89). Comparing the 2021 aerial photo with the 2018 aerial photo, one tree has been removed and what appeared to be a line of small trees in 2018 has now been reduced to a hedge.

DCC Highways – No objection. The site is accessed off a C Classified County Route which is restricted to 30 MPH. The proposal is for 25 camping pods, replacing 50 touring caravan and camping pitches. There will be no material effect on traffic or travel issues. The access will use the same as the existing, which is considered to be acceptable.

DCC Waste - As this is a retrospective application, it would not be reasonable to require details of the type and amount of waste relating to the construction phase, as required in Policy W4 of the Devon Waste Plan. However, in order to meet the requirements of the policy for the operational phase, we would request that the following details are addressed:

- The predicted annual amount of waste (in tonnes) that will be generated when occupied;
- Identify the main types of waste generated when development is occupied (If possible);
- Methods for limiting the generation of waste;
- Details of the provision of storage facilities, to encourage the re-use and recycling of waste, and enable to segregation of this waste from waste requiring disposal.

Devon County Council Lead Local Flood Authority (LLFA)

30th September 2024: Objection withdrawn following submission of additional information, subject to a pre-commencement condition being imposed to secure: Within 1 month of the planning permission, a detailed design for the surface water drainage system (up to the 1 in 100 year +45% allowance for climate change rainfall event).

26th March 2024: Questioned the length of the permission and if more than 76 years, an allowance for climate change is needed. Queried finish for the access road.

25th October 2023: No major concerns but noted the nearby infiltration testing for the field to the west seems to demonstrate viable infiltration rates. As such, infiltration rates should be assessed further. Upper end climate change value should be used, as the planning permission for the pods could be asked to be renewed in 40 years time.

6 REPRESENTATIONS

6.1 2 objections received, summarised as (can be viewed in full on the file):

Visual impact

- Dawlish Warren is overpopulated with unsightly holiday parks. The field can be seen for miles to the North, East & West. In the autumn/winter when trees are not in leaf this impact is greater.

Residential Amenity

- The properties overlooking the field are higher; pods and individuals using them can be seen. individuals in the pods can see into properties and gardens of permanent residents.
- An increase in light and noise pollution, day and night from the pods, streetlights and vehicle lights.
- Smell from BBQs can be overwhelming during the summer.

Provision of local amenities and recreational areas

- Overdevelopment leads to overpopulated areas, local amenities and green spaces are limited.

Infrastructure, traffic and access to highways

- Access is limited to Dawlish Warren, with roads congested with holiday makers, caravans and mobile homes, damaging surfaces, and hedges, including Week Lane. Access through Cockwood is narrow and unsafe for pedestrian use.
- More individuals to the area mean more transport as individuals are more than likely to drive to their destination and therefore increases pollution and carbon emissions.
- Existing transport infrastructure is already unable to cope with increased capacity, not only by Dawlish Warren but other developments in the locality.

Risk of flooding and appropriate use of sewage/drainage systems

- There is already a lot of surface water flooding with inadequate drainage in place.
- The smell of sewerage is prevalent within Dawlish Warren without adding to current poor management of systems.
- There is a coastal management plan in place to try and attempt to cope with the existing problem of flooding in the area.
- Water pressure is reduced, especially in the summer.

Biodiversity and ecology

- Harm to Dawlish Warren Special Area of Conservation and the Exe Estuary Special Protection Area.
- Removal of hedging/trees
- Concern for the breaching of undeveloped coast. The proposed field site provides a rich and diverse habitat for nature.
- Whilst there is financial contribution to ensure protection of surrounding animals and birds it is tragic and a great pity to lose the limited green space available where many types of birds roost and frequent.
- The increase in light and noise pollution from the pods not only impacts upon permanent residents but also the fauna, which includes, bats, badger, fox, a variety of rodents and reptiles. There is also otter nearby.
- The field is well used by the holiday makers, including dog owners to exercise their dogs.

Park Management

- Importance and consideration should be given to the current overall management of the site. The park does not maintain the already existing maintenance within the park. This is apparent in the field and in close proximately areas to the field, including dumping of their rubbish in the field and surrounding areas.
 - All the pods have been built, they have been rented out without building application or approval.
 - No letters of building works received by neighbours.
- [Officer note: these matters are not planning considerations and would be dealt with under site licensing or environmental health legislation]

7 DAWLISH TOWN COUNCIL'S COMMENTS

7.1 Recommends Refusal on the basis that:

- The location is on open countryside outside of the settlement limit.
- It is in a critical drainage area.
- The proposal has already been done without permission.
- There is an inherent fire risk with the gas cylinders (and the only way out is past these gas cylinders).
- The road is unsuitable.
- The road is unpassable for emergency vehicles.
- The land is set aside for biodiversity.
- It is overdevelopment of the site.

8 COMMUNITY INFRASTRUCTURE LEVY

8.1 CIL liability for this development is Nil as the CIL rate for this type of development is Nil and therefore no CIL is payable.

9 ENVIRONMENTAL IMPACT ASSESSMENT

9.1 Due to its scale, nature and location this development will not have significant effects on the environment and therefore is not considered to be EIA Development.

10 BIODIVERSITY NET GAIN (BNG)

- 10.1 Biodiversity net gain is a legal requirement for planning permissions. Planning applications are required to either provide detailed information proving there will be a biodiversity increase of 10% or explain why they are exempt from doing so. Unless exempt, planning permission is subject to the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended)).
- 10.2 This development is not subject to the general Biodiversity Gain Condition because it is exempt for the following reason: application submitted in 2023, prior to mandatory BNG.

11 CARBON/CLIMATE IMPACT

- 11.1 Given the nature of this development, in that it is replacing an extant permission, it does not have significant carbon or climate change impacts. Parking spaces are proposed as part of the development adjacent to the pods. There is no mention of providing electric charge points so a condition secures this.

12 HUMAN RIGHTS ACT

- 12.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests/the Development Plan and Central Government Guidance.

Head of Development Management