

DELEGATED DECISION OFFICER REPORT

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Planning Development Manager authorisation:	JJ	05/05/2022
Admin checks / despatch completed	DB	05.05.2022
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Application: 21/01997/FUL **Town / Parish:** Harwich Town Council

Applicant: Mr D Baldwin - Friendly Homes Ltd

Address: Land at The Corner of Fronks Road and Beach Road Fronks Road
Dovercourt

Development: Proposed erection of 4 No affordable dwellings.

1. Town / Parish Council

Harwich Town Council
14.12.2021

Harwich Town Council objects to this application on the grounds that this is an overdevelopment, and inappropriate development and a development that will significantly detract from the group heritage value of the Trinity Cottages, Donkey House and leading lights.

Members also raised concern about the ongoing maintenance of the property known as Donkey House and if the planning authority are minded to approve this application, whether this will be better cared for in the future. Alternatively, if the application is not approved, will there be measures in place to better care for the property.

2. Consultation Responses

ECC Highways Dept
07.01.2022

ORIGINAL COMMENTS

I have now had an opportunity to look at this application and I would say there is an error around vehicular access to the site; going by the plan it appears it is south of the existing building which, if that is correct, is far too narrow as I assume the existing driveway to the south is outside the red line going by the images below:

It may be suitable for a pedestrian access but not vehicular. With the previous application the vehicular access was to the north of the existing building shown above. The other issues I have are:

- o Any shared vehicular access would need to be a minimum width of 5.5 metres for at least the first 6 metres from the back of Carriageway / Footway / Highway Boundary and provided with an appropriate dropped kerb crossing of the footway.
- o No details on the visibility splays for the access and these will be impacted by the existing building it would seem.
- o No provision of a turning head to ensure that vehicles can enter and leave the highway in a forward gear, particularly for parking spaces P04. For P03 and as per the Essex Parking Standards (Parking Standards: Design and Good Practice, Sept 2009) 6 metres should be provided behind each parking space to allow for manoeuvring that doesn't appear to be the case for the first space at least.
- o No details on cycle / powered two-wheeler parking/ storage, is the existing building going to be utilised for this?

ECC Highways Dept
09.02.2022
**AMENDED PLANS
COMMENTS**

Based on the current information, the Highway Authority raise an objection to the development.

The information that was submitted in association with the application has been fully considered by the Highway Authority. No site visit was undertaken in conjunction with this planning application. The amended information submitted with the application has been thoroughly assessed and conclusions have been drawn from a desktop study with the observations below based on submitted material, google earth image dated April 2009. It is noted that the proposal is similar to previous application: 18/02004/FUL that the Highway Authority did not raise an objection to. This proposal is now utilising an established private vehicular access that falls within the red line of the site as shown on drawing no. FR 100 Rev. B. Based on the information provided the proposal provides adequate parking and turning for the proposed dwellings, considering these factors:

From a highway and transportation perspective the impact of the proposal is acceptable to Highway Authority subject to the following mitigation and conditions:

1. Prior to occupation of the development a 1.5 metre x 1.5 metre pedestrian visibility splay, as measured from and along the highway boundary, shall be provided on both sides of the vehicular access. Such visibility splays shall be retained free of any obstruction in perpetuity. These visibility splays must not form part of the vehicular surface of the access.

Reason: To provide adequate inter-visibility between the users of the access and pedestrians in the adjoining public highway in the interest of highway safety in accordance with policy DM1.

2. Prior to occupation of the development and as indicated on drawing no. FR 100 Rev. B a vehicular turning facility, of a design to be approved in writing by the Local Planning Authority shall be constructed, surfaced, and maintained free from obstruction within the site at all times for that sole purpose.

Reason: To ensure that vehicles can enter and leave the highway in a forward gear in the interest of highway safety in accordance with policy DM1.

3. Prior to the occupation of any of the proposed dwellings, the existing private drive shall be constructed to a width of 5.5 metres for at least the first 6 metres from the back of Carriageway / Footway / Highway Boundary and provided with an appropriate dropped kerb crossing of the footway/verge.

Reason: To ensure that vehicles can enter and leave the highway in a controlled manner and to ensure that opposing vehicles can pass clear of the limits of the highway, in the interests of highway safety in accordance with policy DM1.

4. No unbound material shall be used in the surface treatment of the vehicular access/ driveway throughout.

Reason: To avoid displacement of loose material onto the highway in the interests of highway safety in accordance with policy DM1.

5. The existing gated access next to the proposed cycle storage building shall be suitably and permanently closed incorporating the reinstatement to full height of the highway verge / footway / cycleway / kerbing immediately the proposed new access is brought into first beneficial use.

Reason: To ensure the removal of and to preclude the creation of unnecessary points of traffic conflict in the highway in the interests of highway safety in accordance with policy DM1.

6. Any new boundary planting shall be planted a minimum of 1 metre back from the highway boundary and any visibility splay.

Reason: To ensure that the future outward growth of the planting does not encroach upon the highway or interfere with the passage of users of the highway, to preserve the integrity of the highway and in the interests of highway safety and in accordance with Policy DM1.

7. The proposed development shall not be occupied until such time as the vehicle parking area indicated on the approved plans, has been hard surfaced, sealed and if required marked out in parking bays. The vehicle parking area and associated turning area shall be retained in this form at all times. The vehicle parking shall not be used for any purpose other than the parking of vehicles that are related to the use of the development unless otherwise agreed with the Local Planning Authority.

Reason: To ensure that on street parking of vehicles in the adjoining streets does not occur in the interests of highway safety and that appropriate parking is provided in accordance with Policy DM8.

8. Prior to occupation of the proposed development, the Developer shall be responsible for the provision and implementation of a Residential Travel Information Pack per dwelling, for sustainable transport, approved by Essex County Council, (to include six one day travel vouchers for use with the relevant local public transport operator).

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport in accordance with policies DM9 and DM10.

9. No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved plan shall be adhered to throughout the construction period. The Plan shall provide for:

- i. vehicle routing,
- ii. the parking of vehicles of site operatives and visitors,
- iii. loading and unloading of plant and materials,
- iv. storage of plant and materials used in constructing the development,
- v. wheel and underbody washing facilities.

Reason: To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM1.

The above conditions are to ensure that the proposal conforms to the relevant policies contained within the County Highway Authority's Development Management Policies, adopted as County Council Supplementary Guidance in February 2011.

Informative:

1: As the site will be utilising an existing access that is classified as a Private Road, the applicant must therefore be requested to demonstrate the rights of pass and repass to the proposed development site exist in perpetuity and that the applicant also has the necessary permissions to make a vehicular connection to the

private drive.

2: All work within or affecting the highway is to be laid out and constructed by prior arrangement with and to the requirements and specifications of the Highway Authority; all details shall be agreed before the commencement of works.

The applicants should be advised to contact the Development Management Team by email at development.management@essexhighways.org

3: On the completion of the Development, all roads, footways/paths, cycle ways, covers, gratings, fences, barriers, grass verges, trees, and any other street furniture within the Site and in the area, it covers, and any neighbouring areas affected by it, must be left in a fully functional repaired/renovated state to a standard accepted by the appropriate statutory authority.

4: The Highway Authority cannot accept any liability for costs associated with a developer's improvement. This includes design check safety audits, site supervision, commuted sums for maintenance and any potential claims under Part 1 and Part 2 of the Land Compensation Act 1973. To protect the Highway Authority against such compensation claims a cash deposit or bond may be required.

Essex County Council
Ecology
07.02.2022

Thank you for consulting Place Services on the above application.

No objection subject to securing:

- a) A proportionate financial contribution towards effective visitor management measures in line with Essex Coast RAMS; and
- b) biodiversity mitigation and enhancement measures

Summary

We have reviewed the Update to Preliminary Ecological Appraisal (Richard Kilshaw ecological services, August 2021), the Completion of Ecological Assessment and Mitigation Works (Richard Kilshaw ecological services, October 2019) and site photos showing the overgrown condition of the site provided by the LPA (Feb 2022) relating to the likely impacts of development on designated sites, protected species and Priority species & habitats and identification of appropriate mitigation measures.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

We note that Tendring DC have prepared a project level HRA Appropriate Assessment which identifies that the development is close to both the Stour and Orwell SPA and Ramsar and Hamford Water SPA, SAC and Ramsar. Therefore this site lies within the Zone of Influence (ZOI) for the Essex Coast RAMS and delivery of mitigation measures in perpetuity will therefore be necessary to ensure that this proposal will not have an adverse effect on the integrity of the above Habitats sites from recreational disturbance, when considered 'in combination' with other plans and projects. We also note that Tendring DC will secure the Essex Coast RAMS

contribution per dwelling under a legal agreement.

We welcome the walk over survey undertaken to ensure that the report is within CIEEM advice note for lifespan of ecological reports and surveys (2019) and given the overgrown nature of the site, we recommend that the mitigation measures identified in Appendix 1 of the Preliminary Ecological Appraisal (Richard Kilshaw ecological services, August 2021) should be secured by a condition of any consent and implemented in full. This includes clearance of vegetation onsite outside the bird nesting season i.e. September to February, supervision of bramble clearance by an Ecological Clerk of Works and mitigation measures for excavations as well as appropriate protection for the Sycamore tree during site clearance and the construction phase. This is necessary to conserve and enhance protected and Priority species.

We also support the proposed reasonable biodiversity enhancements in section 6 of the PEA (2019) which includes hedgehog friendly fencing within the development. These have been recommended to secure net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework 2021. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy and should be secured as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions:

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in Appendix of the Preliminary Ecological Appraisal (Richard Kilshaw ecological services, August 2021) and Completion of Ecological Assessment and Mitigation Works (Richard Kilshaw ecological services, October 2019) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This will include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during site clearance and construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENT STRATEGY

"A Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;
- b) detailed designs to achieve stated objectives;
- c) locations of proposed enhancement measures by appropriate maps and plans;
- d) persons responsible for implementing the enhancement measures;
- e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."

Reason: To enhance protected and Priority species & habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

Essex County Council
Archaeology
05.01.2022

The above application for the erection of 4 houses lies within an area identified on the Essex HER as the site of a Napoleonic signal station (HER 47746).

A line of coastal signal stations was established by the Admiralty in 1794 from Kent to Lands End. In 1795 the line was extended to Great Yarmouth and subsequently on to cover most of the country's coastline. The signalling equipment comprised of a fiftyfoot mast with a thirty-foot top mast and a thirty-foot crossyard from which could be displayed from ten hoists 145 different combinations of flags. The outbuilding along Beach Rd may be a surviving element of the signalling station and there is potential for further remains associated with the military structure and presence to be preserved below ground which will be impacted by the proposed development.

The following recommendations are made in line with the National Planning Policy Framework:

RECOMMENDATION: Archaeological evaluation

1. No development or preliminary groundworks of any kind shall take place until a programme of archaeological investigation has been secured in accordance with a written scheme of investigation which has been submitted by the applicant, and approved in writing by the local planning authority.

2. No development or preliminary groundworks of any kind shall take place until the completion of the programme of archaeological investigation identified in the WSI defined in 1 above.

3. The applicant will submit to the local planning authority a post excavation assessment (to be submitted within six months of the completion of the fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

Reason for recommendation

The Essex HER shows that the proposed development is located within an area with potential for below ground archaeological deposits. The development would result in harm to non-designated heritage assets with archaeological interest.

Further Recommendations:

A professional team of archaeologists should undertake the archaeological work. The archaeological work will comprise initial trial trenching evaluation.

A brief outlining the level of archaeological investigation will be issued from this office on request. Tendring District Council should inform the applicant of the recommendation and its financial implications.

Essex County Council
Heritage
23.12.2021

The application is for the proposed erection of four affordable dwellings at the corner of Fronks Road and Beach Road. The proposal is a revised scheme of refused application 18/02004/FUL for the proposed construction of two houses.

The proposed site lies between Trinity House Cottages and the Donkey House, both Grade II listed, originally built as ancillary to the lighthouse and within the earliest buildings in this part of Dovercourt. The two assets have a strong physical, functional and historical relationship and their setting significantly contributes to the way they are experienced, as was correctly analysed and assessed in the Heritage Statement. The construction of the proposed new dwellings will permanently change the general character of the site and the use of land and will interrupt the visual connection between the two buildings, with a significant impact on the designated assets and their setting. Similar considerations were also highlighted in the Delegated Decision Officer Report attached to the previous application.

The proposal will cause 'less than substantial' harm to both listed buildings. While considering this application, the local planning authority should give great weight to the heritage asset's conservation as per Paragraph 199 of the NPPF and clear and convincing justification should be provided for any level of harm (Paragraph 200).

The application is also not compliant with paragraph 206 of the NPPF.

This application will adversely affect the setting of two designated heritage assets and their significance. This will harm how the assets are appreciated, experienced and understood.

Objections to the development of this site in-principle have been outlined in previous applications and in pre-application advice which this letter is consistent with.

Essex Police – Designing
out crime
15.12.2021

Essex Police considers that it is important that this development is designed incorporating the maximum achievable benefit of Crime Prevention Through Environmental Design (CPTED) for which Secured by Design (SBD) is the preferred enabler. This reflects sections 91 and 127 of the NPPF which support the need for safe

and secure developments. Good design should aim to achieve healthy, inclusive and safe places, which are accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.

There is no reference to security in this application. As such, we would like to invite the developers to contact us with a view to discussing embedding CPTED into this development to comply with the Tendring Local Plan policy LP4, which requires developments are safe, secure places to live, to 'minimise the opportunities for crime and anti-social behaviour by ensuring good surveillance, clear definition between public and private spaces'.

It is strongly recommended that the developer seeks to achieve Secured By Design - Homes 2019 accreditation for this development.

We would raise the following points -

- The rear parking to plots 1- 4. Will the rear garden gate access have a key to key locking mechanism fitted to allow immediate access to the rear of the properties while maintaining effective security?
- Will the prospective tenants be able to view the car parking area from the active rooms of the properties?
- What lighting is proposed for the rear parking area? Bollard lighting is often suggested in parking areas but should be avoided as this is ineffective with the light being blocked by cars parked within a car park as well as the upward light distorting features making identification difficult.

Essex Police provide a no cost, impartial advice service to applicants who require advice on Crime Prevention Through Environmental Design and Secured by Design and invites them to contact Essex Police via designingoutcrime@essex.police.uk to discuss this further.

3. Planning History

99/00980/FUL	Erection of detached house	Withdrawn	28.02.2000
18/02004/FUL	Proposed construction of 2no. houses.	Refused	29.01.2019

4. Relevant Policies / Government Guidance

National:

National Planning Policy Framework July 2021

National Planning Practice Guidance

Local:

Tendring District Local Plan 2013-2033 and Beyond North Essex Authorities' Shared Strategic Section 1 Plan (adopted January 2021)

SP1 Presumption in Favour of Sustainable Development

SP2 Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

SP3 Spatial Strategy for North Essex

- SP4 Meeting Housing Needs
- SP7 Place Shaping Principles

Tendring District Local Plan 2013-2033 and Beyond Section 2 (adopted January 2022)

- SPL1 Managing Growth
- SPL2 Settlement Development Boundaries
- SPL3 Sustainable Design
- LP3 Housing Density and Standards
- LP4 Housing Layout
- LP5 Affordable Housing
- HP5 Open Space, Sports and Recreation Facilities
- PPL4 Biodiversity and Geodiversity
- PPL5 Water Conservation, Drainage and Sewerage
- PPL7 Archaeology
- PPL9 Listed Buildings
- PPL10 Renewable Energy Generation and Energy Efficiency Measures
- CP1 Sustainable Transport and Accessibility

Supplementary Planning Guidance

Essex Design Guide

Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy SPD 2020 (RAMS)

Tendring Provision of Recreational Open Space for New Development SPD 2008

Local Planning Guidance

Essex County Council Car Parking Standards - Design and Good Practice

Status of the Local Plan

Planning law requires that decisions on applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (Section 70(2) of the 1990 Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004). This is set out in Paragraph 2 of the National Planning Policy Framework (the Framework). The 'development plan' for Tendring comprises, in part, Sections 1 and 2 of the Tendring District Council 2013-33 and Beyond Local Plan (adopted January 2021 and January 2022, respectively), together with any neighbourhood plans that have been brought into force.

In relation to housing supply:

The Framework requires Councils boost significantly the supply of housing to meet objectively assessed future housing needs in full. In any one year, Councils must be able to identify five years of deliverable housing land against their projected housing requirements (plus an appropriate buffer to ensure choice and competition in the market for land, to account for any fluctuations in the market or to improve the prospect of achieving the planned supply). If this is not possible or if housing delivery over the previous three years has been substantially below (less than 75%) the housing requirement, Paragraph 11 d) of the Framework requires granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole (what is often termed the 'tilted balance').

The Local Plan fixes the Council's housing requirement at 550 dwellings per annum. On 19 October 2021 the Council's Strategic Housing Land Availability Assessment (SHLAA) updated the housing land supply position. The SHLAA demonstrates in excess of a six-and-a-half-year supply of deliverable housing land. On 14 January 2022 the Government published the Housing Delivery Test (HDT) 2021 measurement. Against a requirement for 1420 homes for 2018-2021, the total number of homes delivered was 2345. The Council's HDT 2021 measurement was therefore 165%. As a result, the 'tilted balance' at paragraph 11 d) of the Framework does not apply to applications for housing.

5. Officer Appraisal (including Site Description and Proposal)

Site Description

The application site comprises land to the north-east corner of Beach Road, which also runs parallel to Fronks Road within the parish of Dovercourt. The site is currently laid to grass, with an established Sycamore located to the north-western corner afforded formal legal protection. To the east of the site fronting Fronks Road are the Grade II Listed 'Trinity House Cottages'. To the south-west corner of the site is the 'Donkey House', also a Grade II Listed building. Along the southern boundary of the site runs an existing vehicular access road from Beach Road leading to the parking and garages serving Trinity House Cottages.

The character of the surrounding area is heavily urbanised, with a large number of residential properties located to all sides. The beach is approximately 150m to the south and the Dovercourt Town Centre approximately 600m to the north-east.

The application site lies within the defined settlement development boundary of Dovercourt as set out within the adopted Tendring District Local Plan 2013-2033 and Beyond.

Description of Proposal

The application seeks full planning permission for the erection of a terrace of 4 no. two-bedroom affordable dwellings indicated as 'Social, Affordable or Intermediate Rent' on the accompanying application form. The proposed plans show a parking court to the rear of the site, adjacent to the Beach Road access together with cycle storage provision within the Donkey House (no plans or details have been submitted in relation to the Donkey House renovations/alterations. Furthermore, separate listed building consent would be required for such works).

Assessment

The main considerations in this instance are:

1. Planning History;
2. Principle of Development;
3. Design and Impact on Heritage Assets;
4. Affordable Housing;
5. Trees and Landscaping;
6. Access, Parking and Highway Safety;
7. Residential Amenities;
8. Ecology;

9. Drainage and Foul Sewage Disposal;
10. Archaeology;
11. Planning Obligation – Open Space and Play Space Contribution;
12. Planning Obligation – Recreational Disturbance Mitigation;
13. Representations; and,
14. Planning Balance and Conclusion.

1. Planning History

This application follows a previously refused scheme on the site for the construction 2 no. houses refused under planning application reference 18/02004/FUL.

Application 18/02004/FUL was refused on the following grounds:

Heritage Impact

- Less than substantial harm to the character and appearance of the Grade II Listed Buildings as a whole.
- Significant harm to the open and spacious setting of the site.
- No special public benefits as a result of two additional dwellings that outweigh this identified harm.
- The scale, bulk and detailed design of the proposal fails to respect the character of Trinity Cottages or the Donkey House and will enclose the important open and spacious character of the site, blocking views of the decorative side elevation of the cottages which closely mimics the principal elevation.
- The proposed parking areas located to the rear will see a demonstrably harmful impact upon the setting of the Donkey House resulting from the hard surfacing dominating its setting.

Impact on Protected Tree

- Construction of the building in the proposed location would result in a significant incursion into the Root Protection Area (RPA) of the tree that would cause harm to the tree.

Planning Obligations

- Failure to provide a UU to secure contribution toward open space.

Neighbour Amenity Harm

- Significant material harm to the outlook of Number 41 Trinity Cottages due to the close siting, two storey height and depth of the proposed dwellings.

The application was not subject of an appeal to The Planning Inspectorate.

2. Principle of Development

The site lies within the Settlement Development Boundary (SDB) for Dovercourt as defined within the adopted Tendring District Local Plan 2013-2033. Local Plan Policy SPL 2 states that within the SDB there will be a general presumption in favour of new development subject to detailed consideration against other relevant Local Plan policies.

The principle of residential development on the site is therefore acceptable subject to there being no harm to the character of the area and various other detailed planning considerations having regard to the specific site constraints and relevant local plan policies.

3. Design and Impact on Heritage Assets

The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Paragraph 127 of the Framework requires that developments are visually attractive as a result of good architecture, are sympathetic to local character, and establish or maintain a strong sense of place.

Adopted Policy SP7 of the 2013-33 Local Plan seeks high standards of urban and architectural design, which responds positively to local character and context. Policies SPL3 and LP4 of Section 2 of the 2013-33 Local Plan also require, amongst other things, that developments deliver new dwellings that are designed to high standards and which, together with a well-considered site layout, create a unique sense of place.

Section 16 (paragraphs 189 – 208) of the NPPF (Conserving and enhancing the historic environment) outlines policies relating to the historic environment and the key role it plays in the Government's definition of sustainable development, the principle which underpins the document. It requires that local planning authorities 'should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment', recognising that 'heritage assets are an irreplaceable resource' and should be conserved 'in a manner appropriate to their significance'. It also requires that applicants should 'describe the significance of any heritage assets affected' by their application, 'including any contribution made by their setting'. Specifically, the NPPF states the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Policy PPL 9 of the adopted Local Plan states that proposals for new development affecting a listed building or its setting will only be permitted where they will protect its special architectural or historic interest, its character, appearance and fabric. Where a proposal will cause harm to a listed building, the relevant paragraphs of the NPPF should be applied dependent on the level of harm caused.

Historic records tell us that the 'Donkey House' significance derives from its group value as a building associated with Trinity House Cottages which is one of the earliest buildings in this part of Dovercourt. The use of picturesque architectural detailing such as parapet gables provides a visual link with Trinity House Cottages. The proximity and relationship of this building to Trinity House provides evidence of the building's historic association and use, therefore being highly important to an understanding of the outbuilding's significance. The setting of the outbuilding is a major contributor to its significance and the site is a key element of the outbuilding's setting and one of the principle elements of the setting that contributes to the building's significance. Thus, the two assets have a strong physical, functional and historical relationship and their setting significantly contributes to the way they are experienced (as correctly analysed and assessed in the accompanying Heritage Statement).

Whilst it is recognised that housing development now surrounds the majority of the site the land in question is clearly associated with the historic use of the outbuilding and cottages (paddock land) being of particular importance to the setting and historical value of the heritage assets overall. The site cannot be considered directly comparable to the surrounding land that has been developed for housing over the years due to its important historic use and relationship with the buildings. Furthermore, the loss of the surrounding land only exacerbates the importance of the remaining open land and the relationship between the listed buildings it protects and enhances.

Whilst it is recognised that the proposed dwellings are sited back from the highway behind the front elevation of Trinity House Cottages, the impact of this arrangement will sever the important relationship between the cottages and the Donkey House to the significant detriment of their setting and group historical value. The proposed development will also enclose the important open and spacious character of the site and partially block views of the important principal side elevation of the cottages.

Officers accept that the overall appearance of the dwellings is acceptable, demonstrating some regard to the projecting gables and other existing features of Trinity Cottages. However, the

setback, siting and narrow proportions of the dwellings fails to respond to the character of Trinity Cottages or the existing pattern of development along Fronks Road. The proposed facing brick as detailed on the application form (Retro Oregon Stock) is also considered to be out of keeping with the character of Trinity Cottages and the locality which is clearly characterised by render and red brick (although this a matter that could be addressed as part of a planning condition).

Additionally, the proposed parking areas located to the rear will see a demonstrably harmful impact upon the setting of the Donkey House from the loss of greenery, excessive hardstanding, boundary fencing and general resultant change in character. No information concerning how the Donkey House would be renovated and converted into cycle storage to serve the development accompanies the application. The application therefore fails to demonstrate how the development of the site delivers any benefits in regard to the preservation of the listed Donkey House or cycle storage provision for the new dwellings.

The development fails to make a positive contribution to local character and distinctiveness and does not secure opportunities to enhance or better reveal the significance of the identified heritage assets, contrary to paragraphs 197 (c) and 206 of the NPPF. The construction of the proposed new dwellings will permanently change the general character of the site and the use of land and will interrupt the visual connection between the two buildings, with a significant impact on the designated assets and their setting. This will harm how the assets are appreciated, experienced and understood. The proposal will cause 'less than substantial' harm to both listed buildings.

Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal. The applicant argues that the delivery of affordable housing weighs in favour of the proposal. However, for the reasons given in the section directly below the public benefits would not outweigh the identified harm.

The proposed development remains contrary to national and local plan policy and does not overcome the previous reasons for refusal of application 18/02004/FUL.

4. Affordable Housing

Policy LP5 of the Local Plan states that development proposals outside of 11 or more (net) homes, the Council will expect 30% of new dwellings, (including conversions) to be made available to Tendring District Council (subject to viability testing) or its nominated partner(s) to acquire at a proportionate discounted value for use as affordable housing. The number of units proposed falls under the threshold for an affordable housing planning obligation required by Policy LP5.

At paragraph 6.10 of the accompanying planning statement it states that, the scheme is 100% affordable, and should be endorsed and secured through S106 legal agreement. The application is presented by the agent on the basis that the delivery of 4 affordable units should be considered as a significant benefit that outweighs the heritage harm described above.

In this instance, and assuming the affordable housing units can be secured via a S106 legal agreement, moderate (rather than limited) weight can be attributed to the public benefit of providing 4 no. affordable housing units because it is generally more challenging to bring forward and secure affordable housing than market housing even though the Council has demonstrated that it can, over the plan period, meet all its housing needs through its allocations and through the allowances of other policies in the newly adopted plan which has clearly been found to be sound by the appointed Planning Inspector. On the other side of the balance are relevant heritage policies and the Planning (Listed Buildings and Conservation Areas) Act 1990 which makes it clear that special (emphasis added) regard should be given to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. This moderate public benefit of bringing forward 4 affordable dwellings is not considered to outweigh the identified harm to designated heritage assets for the reasons given in the section above.

Furthermore, consultation with the Council's Housing Team has been undertaken to establish the housing needs for the area and whether pre-application discussions have taken place regarding this site. The Council's Housing Team did engage with the applicant regarding delivering small-

scale developments through a national pilot scheme with the Small and medium-sized enterprises sector (SMEs). Initially, the proposal was to deliver 2 x 2 bed bungalows on the site but the application proposes 4 x 2 bed houses. Nonetheless, at the time of the bid for the site, Housing consulted with Planning. The planning history and heritage concerns were highlighted. Housing advised the applicant that planning policy must be adhered to and any suggestion of engagement to purchase the units would be strictly subject to planning permission first being granted.

Ultimately, the proposal is contrary to policy and for the reasons given above would result in demonstrable harm to heritage assets and the character of the area.

5. Trees and Landscaping

The main body of the application site is set to grass. In the north western corner of the plot there is an established Sycamore that features prominently in the street scene. The tree is afforded formal legal protection by Tendring District Council Tree Preservation Order TPO/92/30 ' Land corner of Beach Road and Fronks Road, Dovercourt. The tree is a mature healthy specimen that makes a significant positive contribution to the appearance of the public realm.

In order to ascertain the extent of the constraint that the Sycamore tree is on the development potential of the land and to show how the development proposal could be implemented without causing harm to the tree the applicant has provided an Arboricultural Impact Assessment (AIA) as part of a detailed tree survey and report. This information is in accordance with BS5837: 2012 Trees in relation to design, demolition and construction: Recommendations.

The information provided is sufficient to demonstrate that the development proposal can be implemented without causing harm to the tree. The fencing shown on the Tree protection Plan (TPP) should be erected prior to the commencement of construction works and retained in situ for the duration of the construction phase of any development for which planning permission may be granted.

In terms of soft landscaping the information provided in the documents entitled 'Planting Plan' and 'Planting Schedule' is sufficient to secure an adequate level of new planting that would soften, screen and enhance the appearance of the development.

The proposed development therefore overcomes the reason for refusal (2) of application 18/02004/FUL. The required tree protection measures and landscaping could be secured through appropriately worded planning conditions.

6. Access, Parking and Highway Safety

Paragraph 108 of the National Planning Policy Framework 2021 seeks to ensure that safe and suitable access to a development site can be achieved for all users. Policy SPL3 Part B of Section 2 of the Tendring District Local Plan 2013-2033 and Beyond seeks to ensure that access to a new development site is practicable and the highway network will be able to safely accommodate the additional traffic the proposal will generate and provision is made for adequate vehicle and cycle parking.

Furthermore, Policy PPL10 of the Local Plan states that proposals for new development should consider the potential for renewable energy generation, appropriate to the site and its location, and should include renewable energy installations, or be designed to facilitate the retro-fitting of renewable energy installations. This could be secured via planning condition attached to any planning permission.

The EPOA Parking Standards 2009 require that for dwellings with 2 or more bedrooms, a minimum of 2 parking spaces is required. Parking spaces should measure 5.5 metres by 2.9 metres.

Following receipt of an amended red line plan and clarification on the access, the Highway Authority raise no objection to the application subject to conditions. Within their consultation response it is highlighted that the proposal is similar to previous application: 18/02004/FUL for which the Highway Authority did not raise an objection to.

Whilst the application demonstrates that the development can provide sufficient parking spaces in accordance with the above standards, the layout and connectivity from the parking spaces to the dwellings is not ideal, particularly Plot 4. As stated above, the parking area will have a demonstrably harmful impact upon the setting of the Donkey House. As the application is wholly unacceptable, it is not considered necessary to include an additional reason for refusal specifically in relation to the poor parking layout as this can be included as part of the design and impact refusal.

7. Residential Amenities

Paragraph 130 (f) of the National Planning Policy Framework (2021) states that planning should always seek to secure a good standard of amenity for all existing and future occupants.

Section 1 Policy SP7 of the 2013-33 Local Plan requires that the amenity of existing and future residents is protected. Section 2 Policy SPL 3 Part C seeks to ensure that development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties. Furthermore, Policy LP 4 seeks to ensure that new dwellings are served by a private amenity space of a size and configuration that meets the needs and expectations of residents and which is commensurate to the size of dwelling and the character of the area.

The proposed garden and internal floorspace is considered to be sufficient to meet the needs of future occupants and would provide a good level of amenity.

Concerning the impact of the development on existing neighbouring amenities, the majority of windows serving the direct neighbouring property at No. 41 Trinity Cottages are located to the side elevation with views directly across the open and spacious application site. The front-most west-facing window to No. 41 is the primary lounge window (a secondary window faces north). Moving down this westerly elevation to the rear, there is the entrance porch, then the dining room window (its only window) and then a secondary kitchen window. Beyond the rear is the only area of private amenity space available to the cottage – a small walled courtyard. Grassed areas beyond that are not part of the curtilage of No. 41. Application 18/02004/FUL was refused due to the harmful impact on the outlook of No. 41 due to the siting of the dwellings blocking the side facing windows. This current application proposes dwellings sited further back into the site, thus reducing the impact on the side facing windows of No. 41 but worsening the impact on their rear garden area. The proposed dwellings will extend the full length of the westerly aspect of the small private amenity space of No. 41. The depth, height and relationship of the development with No. 41 will appear prominent and oppressive presenting a significant loss of outlook and afternoon sunlight. This overbearing relationship together with the density of development and associated parking areas results in an intensity of activity close to the windows and private amenity space being significantly harmful to the use of the garden area currently enjoyed by the occupiers of No. 41.

The parking and turning areas for the proposed dwellings is located to the rear of the site adjacent to number 1 Beach Road. The access currently only serves 4 garages to the rear of Trinity Cottages. The intensified use of the existing access by the traffic associated with a further 4 dwellings and siting of the proposed parking and turning areas would result in a harmful level of noise and disturbance to the adjacent neighbouring dwelling to the south, to the detriment of their residential amenities. Furthermore, Policy LP4 seeks to minimise the opportunities for crime and anti-social behaviour by ensuring good surveillance and clear definition between public and private spaces. The parking area is also considered contrary to Policy LP4 due to the impractical relationship and poor connectivity with the proposed dwellings.

Whilst the proposed dwellings would be acceptable in terms of the amenities of future occupants, the harm to the amenities of existing residents is considered contrary to the aims of the above-mentioned national and local plan policy.

8. Ecology

Paragraph 174 of the NPPF requires Councils, when determining planning applications, to minimise impacts on and providing net gains for biodiversity. Where significant harm to biodiversity cannot be avoided, mitigated or, as a last resort, compensated for, Councils should refuse planning permission. Local Plan policy PPL4 of the emerging Local Plan gives special protection to designated sites of international, national or local importance to nature conservation but for non-designated sites still require impacts on biodiversity to be considered and thereafter minimised, mitigated or compensated for.

Place Services Ecology Team have provided consultation comments in response to the accompanying Update to Preliminary Ecological Appraisal (Richard Kilshaw ecological services, August 2021), the Completion of Ecological Assessment and Mitigation Works (Richard Kilshaw ecological services, October 2019) and site photos showing the overgrown condition of the site provided by the LPA (Feb 2022), raising no objection to the development subject to securing:

- a. A proportionate financial contribution towards effective visitor management measures in line with Essex Coast RAMS; and
- b. biodiversity mitigation and enhancement measures

There is sufficient ecological information available for determination and the biodiversity mitigation and enhancement requirements would be secured via suitably worded conditions. RAMS is covered below.

9. Drainage and Foul Sewage Disposal

Paragraph 170 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of water pollution. Furthermore, Paragraph 180 of the NPPF states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects of pollution on the natural environment.

Adopted Policy PPL5 of Section 2 of the Adopted Local Plan states that all new development must make adequate provision for drainage and sewerage. Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer. Where private sewage treatment facilities are the only practical option for sewage disposal, they will only be permitted where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour.

The application form accompanying the application failed to provide foul sewage disposal details. However, additional information was received from the agent via email dated 11th January 2022 confirming that mains connection would be possible.

This is in accordance with the above policy requirements and is therefore considered to be acceptable

10. Archaeology

Policy PPL 7 of the adopted Local Plan stipulates that any new development which would affect, or might affect, designated or non-designated archaeological remains will only be considered where a written scheme of investigation including excavation, recording or protection and deposition of archaeological records in a public archive are secured.

Consultation with Essex County Council Archaeology has identified that the site lies within an area identified on the Essex HER as the site of a Napoleonic signal station (HER 47746):

A line of coastal signal stations was established by the Admiralty in 1794 from Kent to Lands End. In 1795 the line was extended to Great Yarmouth and subsequently on to cover most of the country's coastline. The signalling equipment comprised of a fifty-foot mast with a thirty-foot top mast and a thirty-foot crossyard from which could be displayed from ten hoists 145 different combinations of flags. The outbuilding along Beach Rd may be a surviving element of the

signalling station and there is potential for further remains associated with the military structure and presence to be preserved below ground which will be impacted by the proposed development.

Archaeological trial trenching, excavation and historic building records are required. These requirements would be secured via suitably worded conditions in the event of an approval.

11. Planning Obligation – Open Space and Play Space Contribution

Policy HP5 of the 2013-2033 Local Plan aims to maintain, expand and improve the quality and accessibility of public open space, sports and recreational facilities of different types. For smaller scale developments better served by an existing nearby area of open or play space, a financial contribution may be sought through a s106 legal agreement. The contribution would be used towards the delivery of improvements, expansion or new open spaces and/or sports facilities.

There is currently a deficit of -12.67 hectares of equipped play in Harwich and Dovercourt. Due to the overall deficit in both Open Space and Play Areas in Harwich and Dovercourt it is felt that a contribution is justified and relevant to the planning application. The contribution would be used to make improvements at Cliff Park.

The application is accompanied by a Unilateral Undertaking securing this planning obligation, in compliance with the above Local Plan policy.

12. Planning Obligation – Recreational Disturbance Contribution (RAMS)

Under the Habitats Regulations, a development which is likely to have a significant effect or an adverse effect (alone or in combination) on a European designated site must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'. There is no precedent for a residential development meeting those tests, which means that all residential development must provide mitigation. This residential development lies within the Zone of Influence of the Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The residents of new housing are therefore considered likely to regularly visit relevant designated sites for recreation. In order to avoid a likely significant effect in terms of increased recreational disturbance to coastal European designated sites (Habitats sites) mitigation measures will need to be in place prior to occupation.

This residential development lies within the Zone of Influence. The site is not within or directly adjacent to one of the European designated sites, but is approximately 750 metres from the Stour and Orwell Estuaries SPA and Ramsar and 1500 metres Hamford Water Ramsar and SPA.

In order to ensure that the development would not adversely affect the integrity of Habitats sites in line with Policy PPL4 of the emerging Local Plan and Regulation 63 of the Conservation of Habitat and Species Regulations 2017 a proportionate financial contribution in accordance with the emerging Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) is required.

A Unilateral Undertaking securing this planning obligation, in compliance with the above Local Plan policy, accompanies the application.

13. Representations

Harwich Town Council objects to this application on the following grounds (officer response in italics):

- Overdevelopment.
Given that the dwellings are provided with appropriate internal floor space, sufficient garden areas and parking spaces that accord with standards, a refusal based upon overdevelopment of the site is not considered necessary in this instance.
- Inappropriate development that will significantly harm heritage assets.
- Concerns also raised with the conservation and preservation of the Donkey House building.

These matters are addressed in the main report above and form reasons for refusal where relevant.

22 letters of comment and objection have been received (including The Harwich Society and Trinity House, the General Lighthouse Authority.). The objections and concerns raised can be summarised as follows (officer response in italics):

- Significant and demonstrable harm to the setting and group value of the Grade II listed buildings.
- Affordable housing does not overcome heritage harm.
- The sustainable future for the Donkey House is not clear.
- Out of character with the surrounding buildings.
- Harm to wildlife, protected species and biodiversity.
- Not too different to the already refused scheme.
- Harm to neighbouring amenities.

These matters are addressed in the main report above and form reasons for refusal where relevant.

- Unusable impractical parking areas and rear access to houses.
- Unacceptable increase in traffic movements via unsuitable access.
- Increase traffic and parking congestion in the area - harmful to highway and pedestrian safety.

In the absence of a refusal recommendation, it is unlikely that a refusal based upon highway safety could be upheld at appeal. However, the poor access and layout of the proposed parking area does form part of the refusal.

- Overdevelopment of the site.

As above.

- Incorrect and inconsistent plans - change in site levels not shown.

Whilst it is recognised that the plans fail to show the change in levels and any details of the renovation of the Donkey House, in the event of an approval should an appeal be lodged, such discrepancies / missing information could be dealt with by condition securing site levels and details of any works to the Donkey House.

- How will the communal garden areas be maintained?

The proposed garden areas are a design feature and not a policy requirement. In the event of an approval at appeal, any future maintenance would be the responsibility of future residents and could not be controlled as part of the approval.

- Proposed bench in the pocket park is likely to attract anti social behaviour.

Anti-social behaviour is a police matter and cannot be controlled by planning legislation.

- Restrictive covenant on the land for lighthouse related buildings only.

Covenants are not related to planning legislation and would not be a relevant consideration.

- Loss of sea view.

- Devalue my house.

These are not material planning considerations that can be taken into account as part of the planning application process.

The application is also subject of a Planning Committee referral request (should the application be recommended for approval only). Councillor Gary Calver raises the following issues within the referral request (officer response in italics):

- Overdevelopment.
- Inappropriate development in a location of historic significance.
- Will have a negative impact on Grade II listed buildings.

- Would dramatically and permanently alter the existing street scene in an area of important heritage value.

As above or as addressed within the main report.

14. Planning Balance and Conclusions

The NPPF does not change the statutory status of the development plan as the starting point for decision making and as identified above, a less than substantial harm to the setting of Grade II listed Trinity Cottages and associated Donkey House would result from the development. The proposal is not in accordance with the development plan due to the harmful effect upon the character, setting and significance of the Grade II listed buildings and the consequent failure to preserve or enhance the heritage assets. Furthermore, the development would give rise to a harmful impact upon the amenities of neighbouring properties.

In its favour, the public benefits of the proposal are the contribution of 4 affordable dwellings (assuming it can be secured as such) for the local area that would meet affordable dwelling needs of the district and economic benefits through construction jobs and spending in the local economy via the future occupiers. However, the public benefits in that respect would be limited to moderate weight and do not outweigh the great weight given to the desirability of preserving and enhancing the setting and significance of the Grade II listed Trinity Cottages and associated Donkey House as identified.

The proposal would not have an unacceptable impact on highway safety nor would there be any harm to important trees or landscape. The matters of ecology, archaeology and renewable energy generation could be appropriately dealt with by condition. The open space contribution and RAMS mitigation neither weighs in favour nor against, merely being policy compliant. These are therefore neutral factors.

The conflict with the development plan and the NPPF when taken as a whole, and the associated harm identified are significant and overriding factors. Consequently, for the reasons set out above, the application should be refused.

6. Recommendation

Refusal - Full

7. Reasons for Refusal

1 Paragraph 127 of the National Planning Policy Framework 2021 (NPPF) requires that developments are sympathetic to local character and maintain a strong sense of place. Policy SP7 of Section 1 of the adopted Tendring District Council Local Plan 2013-33 and Beyond seeks high standards of design which respond positively to local character and context. Policies SPL3 and LP4 of Section 2 of the adopted Local Plan require that developments deliver new dwellings that are designed to high standards which together with a well-considered site layout, create a unique sense of place.

Paragraphs 189 – 208 of the NPPF outlines policies relating to the historic environment and the key role it plays in the Government's definition of sustainable development, recognising that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, including any contribution made by their setting. Policy PPL 9 of the adopted Local Plan states that new development affecting a listed building or its setting, will only be permitted where it will protect the special architectural or historic interest, its character, appearance and fabric.

The development fails to make a positive contribution to local character and distinctiveness and does not secure opportunities to enhance or better reveal the significance of the identified heritage assets, contrary to paragraphs 197 (c) and 206 of the NPPF. The construction of the proposed new dwellings will permanently change the general character of the site and the use of land. The proposed development will sever and interrupt the visual connection and important relationship between the Grade II Listed Trinity Cottages and the Donkey House resulting in a

significant impact on the designated assets, their setting and group historical value. The development will enclose the important open and spacious character of the site and partially block views of the important principal side elevation of the cottages. The setback, siting and narrow proportions of the dwellings fails to respond to the character of Trinity Cottages or the existing pattern of development along Fronks Road. The proposed parking areas located to the rear will see a demonstrably harmful impact upon the setting of the Donkey House from the loss of greenery, excessive hardstanding, boundary fencing and overall resultant change in character. Furthermore, due to lack of information, the application fails to demonstrate how the Donkey House can be appropriately developed as a cycle store.

Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal. There are insufficient public benefits or special circumstances amounting from the scheme that would outweigh the harm identified above and the development is contrary to the above-mentioned national and local plan policies.

- 2 Paragraph 130 (f) of the National Planning Policy Framework 2021 (NPPF) states that planning should always seek to secure a good standard of amenity for all existing and future occupants. Policy SP7 of Section 1 of the adopted Tendring District Local Plan 2013-33 and Beyond requires that the amenity of existing and future residents is protected. Adopted Local Plan Section 2 Policy SPL 3 Part C seeks to ensure that development will not have a materially damaging impact on the amenities of the occupiers of nearby properties. Adopted Local Plan Section 2 Policy LP4 seeks to minimise the opportunities for crime and anti-social behaviour by ensuring good surveillance and clear definition between public and private spaces.

The proposed dwellings will extend the full length of the westerly aspect of the small private amenity space of No. 41. The depth, height and siting of the development will result in a prominent and oppressive relationship with No. 41 presenting a significant loss of outlook and afternoon sunlight. This overbearing relationship together with the density of development and associated parking areas results in an intensity of activity close to the windows and private amenity space being significantly harmful to the use of the garden area currently enjoyed by the occupiers of No. 41.

The proposed parking area is contrary to Policy LP4 due to the impractical relationship and poor connectivity with the proposed dwellings.

Additionally, the intensified use of the existing access by the traffic associated with a further 4 dwellings together with the location of the proposed parking and turning areas directly adjacent to number 1 Beach Road, would result in a harmful level of noise and disturbance to the detriment of the occupier's residential amenities.

For these reasons, the development fails to secure a good standard of amenity for existing and future occupants contrary to the above-mentioned national and local plan policies.

8. **Informatives**

Positive and Proactive Statement

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Agent. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

Are there any letters to be sent to applicant / agent with the decision? If so please specify:	YES	NO
Are there any third parties to be informed of the decision? If so, please specify:	YES	NO

