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## Appeal Decision

Inquiry held on 13- 16 September 2016

Site visit made on 16 September 2016

**by Louise Nurser BA (Hons) Dip UP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 25 November 2016**

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**Appeal Ref: APP/C1760/W/15/3139873**

**Roundabouts Copse, Botley Road, North Baddesley, Hampshire, SO52 9EE**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Mr Mark Jackson (Gleeson Developments Ltd.) against the decision of Test Valley Borough Council.
  - The application Ref 15/00800/OUTS, dated 2 April 2015, was refused by notice dated 21 December 2015.
  - The development proposed is outline application for the erection of up to 33 dwellings with means of access, open space, landscaping and associated car parking (means of access not reserved).
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### Decision

1. The appeal is dismissed.

### Procedural matters

2. The application was made in outline with all matters reserved for future determination other than access. I have considered the appeal on that basis. I note the illustrative master plan, and other supporting documentation which accompanied the proposal, which includes land outside of the red edge, demonstrates how the appellant envisages the proposal could be developed.
3. Originally, the appellant had made the appeal on the basis of non-determination. However, prior to the validation of the appeal, the Council resolved that it would have refused planning permission and provided six reasons for refusal. As set out in the Statement of Common Ground (SocG) both parties agreed for the appeal to proceed on this basis<sup>1</sup>.
4. Since the appeal was lodged the Test Valley Borough Revised Local Plan (LP) has been adopted<sup>2</sup> and has replaced the saved policies of the Test Valley Borough Local Plan (2006) (TVBLP). In addition, the Council has adopted the Community Infrastructure Levy Charging Schedule (CIL CS) in January 2016.
5. A report was taken to the Southern Area Planning Committee<sup>3</sup> setting out revised reasons for refusal. To reflect the introduction of CIL, reasons for refusal 4 and 5 were considered no longer applicable as the contributions for

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<sup>1</sup> Paragraph 1.7 of the SoCG

<sup>2</sup> January 2016

<sup>3</sup> 30 August 2016

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recreational facilities, public open space and transport matters would be funded via CIL monies. In addition, subject to the completion of a satisfactory S106 planning obligation to provide affordable housing and address matters relating to the provision of an area of suitable alternative natural green (SANG) land to mitigate the impact of the proposed development on the New Forest SPA, and a financial contribution to mitigate against the impact on the Solent and Southampton SPA, reasons for refusal 3 and 6 were considered to be no longer applicable.

6. A completed planning obligation under Section 106 of the Town and Country Planning Act 1990 was submitted at the Inquiry. The S106 includes obligations relating to affordable housing, contributions to provide for the required infrastructure for additional school places at North Baddesley Infant and Junior Schools, SANG mitigation land, and mitigation measures relating to the impact of the development on the Solent and Southampton Water Special Protection Area. Following two screening opinions it was confirmed that the appeal proposal was not Environmental Impact Assessment did not require an EIA.
7. During the Inquiry the Local Gap Topic Paper within the Core Documents was replaced by a correctly numbered version.
8. I am aware of a number of inaccuracies within the Council's original Committee Report and that following the amendments to the reasons for refusal set out in the August report that a further rebalancing exercise was not undertaken. Whilst for completeness, this would have been appropriate it does not influence the main issues before me.
9. The original application did not include a post code within the address of the appeal site. This was confirmed at the Inquiry as SO52 9EE.
10. Following the close of the Inquiry I was provided with, and accepted a copy of an appeal decision<sup>4</sup> relating to land east of Rownhams, which is also within the Test Valley Borough. Both parties were provided with the opportunity to comment on the implications, if any, to my consideration of the appeal before me.

### **Background and Main Issues**

11. It is agreed that the proposed development lies outside of the settlement boundary for North Baddesley as defined by Policy COM2 of the LP, and that the proposed housing development of up to 33 dwellings does not accord with the list of developments considered as appropriate within the open countryside. It is also agreed within the SoCG that the appeal proposal conflicts with Policy E3 of the LP which relates to defined Local Gaps, including that between North Baddesley and Chilworth villages.
12. There is no dispute between the parties that the policies of the recently adopted LP are up to date, including those relating to the supply of housing, and consistent with the Framework. As such, the second bullet point under the second limb of Paragraph 14 is not engaged.
13. In the light of the above and from what I have seen, read and heard I consider the main issues of the case are: a) the effect of the proposed development on the landscape character of the immediate area and the physical and visual

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<sup>4</sup> APP/C1760/W/15/3139021

integrity of the Local Gap; and b) whether in the light of the development plan, national policy and guidance, and other material considerations, including housing land supply, that the proposal would be an acceptable and sustainable form of development.

## **Reasons**

### *Site and context*

14. The appeal site is roughly shaped like a truncated triangle. The proposed development of around 1.88 ha is proposed to be accessed from Botley Road, which links North Baddesley to Chilworth.
15. It lies to the south of the Key Service Centre of North Baddesley. This is a sizeable settlement, which includes an infant and junior school, a doctors' surgery, local shops and a Community Centre. Further housing has been planned through the LP at Hoe Lane on the edge of North Baddesley.
16. Ribbon development fronting Botley Road lies to the north of the appeal site. To the west, is the wooded boundary to the playing fields associated with the nearby junior school. At its westernmost point, the site abuts residential development at Fleming Court. Botley Road runs to the east of the site with the densely wooded Wren's Copse on the other side of the A27 which is a single carriageway. To the south of the appeal site is a band of trees which acts as a buffer to a line of ancient woodland, and beyond that open grassland bound by a belt of woodland. This area of land is to be provided as open space and to serve as SANG mitigation land. Chilworth Golf Club lies to the south of this.

### *Landscape Character*

17. The appeal site lies within the South Hampshire Lowlands National Character Area defined in the Landscape Character Map of England, and both the Romsey to Eastleigh Wooded Lowland Mosaic Character Area 2D, identified in the Hampshire County Integrated Character Assessment and the North Baddesley to Chilworth Woodland Mosaic, Landscape Character Area 2B, as set out within the Test Valley Community Landscape Project (TVCLP) within Woodland Associated with Heathland Landscape Character Type<sup>5</sup>. The area is not covered by any specific national designations designed to protect the landscape. However, Policy E2 of the LP provides a general requirement that development should protect, conserve and enhance the landscape character of the Borough and the landscape assessments are a useful tool in applying the policy.
18. From what I have seen, read and heard, including from my consideration of the wider area, that the landscape in which the appeal site lies, is characterised by areas of open arable land together with wooded copses, and plantations, making up belts of woodland and glades, grassland and heath. The appeal site itself, as defined by the red edge contains an area of unmanaged grassland bound by trees, some of which are protected by group and individual Tree Preservation Orders, together with an area of Ancient Woodland to the south. At the time of my site visit which took place in the summer, when the trees and vegetation were in full leaf, it was possible to glimpse the open land through the trees. I am aware from the aerial photograph submitted at the Inquiry (ID7) that pockets of open land within wooded areas linked to denser woodland are not untypical of the wider area. This sylvan character is in contrast to the

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<sup>5</sup> As set out in paragraph 6.3 of the SoCG

predominantly urban character of the built development within the village, including the housing along Botley Road.

19. The appellant refers to three parcels of land: A, B and C. However, whilst I note that sites B and C are in the appellant's control, and that mitigation measures such as planting and management are proposed as part of the wider development, it is the Parcel A that will experience the most significant change following the proposed construction of 33 dwellings.
20. The appellant's landscape witness considers that there would be a 'significant yet very localised adverse effect on the character of the North Baddesley to Chilworth Mosaic LCA<sup>6</sup>' from the construction of the housing on the area of open land. This chimes with the Council's landscape witness who described the impact on land use as major adverse<sup>7</sup> when referring to the development of the site for housing.
21. In relation to the wider impacts of the development, I note from both the landscape evidence and from what I heard at the Inquiry that the proposed screening and additional planting, together with the active management of Parcel B would significantly mitigate the impacts of the development on long distance views. Therefore, the wider visual impact of the proposed development would be, for the most part, negligible in the summer, and significantly reduced in the winter.
22. However, the access road, together with the built development which would be visible in winter months from Botley Road would result, as set out in paragraph 6.13 of the appellant's LVA, in a localised adverse effect on views experienced by travellers and pedestrians when approaching North Baddesley from Chilworth by introducing development and lighting into a currently, undeveloped and unlit, apparently wooded area. The appellant considers that the sensitivity of the receptors would be low, and given the very localised impact of the development that as a whole that the effects would be likely to be slight to negligible adverse<sup>8</sup>. This is in contrast to the Council who argued that there would be a major adverse impact due to the urbanising impact on the existing undeveloped area<sup>9</sup>.
23. I have also been mindful of the conclusion of the Inspector in relation to a larger development on the wider site<sup>10</sup> that, *'the proposal would have limited local impact on the landscape, gap and important open area...'*. However, from the evidence before me, access arrangements were substantively different.
24. In addition, I note that the Council's arboricultural officer raised no objection to the loss of the trees; three of which are not aged or veteran, and the other is described as 90% dead. Nonetheless, I conclude that in the context of this particular proposal the proposed development would have an adverse impact on the immediate wooded element of the landscape which makes up the Woodland Mosaic element of the landscape, and a suburbanising impact on the wider area as a result of the access road, street lighting and, most obviously in the winter, the housing by extending built development into the sylvan belt of trees which delineates, together with Wren's Copse, entry into the open

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<sup>6</sup> Paragraph 6.9 CD 6.11

<sup>7</sup> Table 2, page 35 PoE Louise Ward

<sup>8</sup> Paragraph 6.16 CD 6.11

<sup>9</sup> Table 2, page 34 PoE Louise Ward

<sup>10</sup> APP/C1760/A/01/1068843

countryside. Therefore I conclude that the proposed development would be contrary to Policy E2 of the LP as it would have a detrimental impact on the appearance of the immediate area and the landscape character in which it is located.

### *Local Gap*

25. To prevent coalescence of settlements and to ensure a sense of place is maintained for both those individual communities and for those travelling through the gaps there has been a long standing policy objective within the local plans of Test Valley Borough and of neighbouring authorities to define and maintain meaningful Local Gaps between particular settlements. Policy E3 of the recently adopted LP defines a Local Gap between North Baddesley and Chilworth. I have been referred in great detail to the Local Gap Topic Paper which underpins the Council's approach to defining the Local Gap on the Policies Map. It is clear to me that the purpose of the Local Gap Topic Paper was to inform the definition of the boundary, which has been confirmed through the adoption of the Local Plan following independent examination. In turn, the purpose of the policy is to provide a boundary which is avowedly restrictive in nature.
26. The Examining Inspector (EI) considered the soundness of the Council's approach and had specific regard to the extent of the Local Gap boundary as it impacts on the appeal site. However, whilst I accept that the EI's role was to examine the soundness of the Plan as promoted by the Council and its consistency with the provisions of the Framework, in doing so he critically addressed the objectives of the policy, including the potential tension between the local gap policy and a positive approach to development promulgated by the Framework. It is not my role to reappraise the appropriateness of the boundary in relation to the appeal site. These matters were properly considered in the recent hearings, supported by submitted evidence, including reference to the historic appeal on the site<sup>11</sup>.
27. In addition, I note too, that the boundaries of the Local Gap, including as it affects the appeal site, as defined by the previous Local Plan were also the subject of detailed consideration by the Examining Inspectors into the Test Valley Borough Local Plan Review (CD2.6).
28. The proposed development on its own would not result in the coalescence of the two settlements. However, clearly the function of the Local Gap policy is to prevent this happening by defining a boundary or gap within which development is restricted. As such, it is not convincing or persuasive to argue that development within the Local Gap is consistent with the objectives of the policy as long as coalescence does not occur. In coming to this conclusion, I am aware that the wording of the policy sets out that for development to accord with the policy it must both satisfy criterion a) which relates to the extent of the gap AND criterion b) which refers to the integrity of the gap. It does not provide for an option of OR.
29. Policy E3 refers to development not diminishing physical or visual separation between the settlements. I am aware that visual cues already exist in the vicinity of the appeal site to suggest the approach to the settlement of North Baddesley. These include the presence of a narrow footpath set within a

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<sup>11</sup> APP/C1760/A/01/1068843

grassed verge, advisory and mandatory traffic signs, and a 30 mile speed limit painted on the road<sup>12</sup>. In addition, I note that there are plans to provide a segregated cycleway between the two settlements. From what I observed on site and the evidence before me, the currently wooded area appears to be, and is clearly outside of the settlement and functions as part of the Local Gap separating North Baddesley from Chilworth. However, for the most part the development would be screened and the visible impact would be limited to that perceived by those travelling through the defined gap.

30. Nevertheless, from what I saw, read and heard, I conclude the consequence of the introduction of highway works to provide an access, with the concomitant loss of trees, together with the provision of adequate sight lines (2.4 m x 160 m) to ensure safe access to and from the site, would be that the 'threshold' at which the perception of arriving in North Baddesley would be brought closer to Chilworth. This would correspond approximately to the southern edge of Parcel A, or around 70 m further south from the current edge of the settlement boundary. This would be a permanent, albeit localised impact. In addition, during the winter months, lights from the houses and street lights within the development would be visible through the trees. All of this would have a suburbanising impact and would extend both the actual and perceived built up area of the Key Service Village further into the open countryside and reduce, and diminish the gap between the two settlements.
31. As part of my accompanied site visit I travelled by car between the two gaps, and was aware that the time taken to travel between them was very short. This confirms the importance to me of protecting the integrity of the Local Gap from incremental development and the gap's sensitivity to incremental development. Therefore, the construction of up to 33 dwellings on land which was previously open, however well-designed, will extend the urban form into the open countryside and reduce the physical extent of the Local Gap from around 1050 metres to 950 metres<sup>13</sup>, which is a reduction of around a tenth. This would clearly unacceptably and materially diminish the physical separation between the two settlements and from my conclusions above relating to the visual impact, diminish the visual separation and therefore compromise the integrity of the Local Gap as a whole. As such, the proposed development would be contrary to Policy E3 of the LP.
32. In coming to this conclusion, I have been mindful that one of the purposes of the gap is to maintain a sense of place for both those living in the communities and those travelling through the gap. I accept that were the development to be built that the villagers of North Baddesley would still be living within a settlement within a wooded setting. However, from what I saw there is a clear contrast between North Baddesley and the rural area which frames the settlement. Indeed, Mrs Tupper referred to the importance of both woodland and clearings in defining North Baddesley's individual identity. Therefore, I consider that the construction of housing on a clearing within an area of woodland just outside of the settlement within the Local Gap, albeit, not significantly, would impact the sense of place of those living within North Baddesley. Moreover, whilst it is clearly common ground between the parties that the visual impact would be localised, in the context of a narrow gap, the incursion of built development along Botley Road into the Local Gap takes on

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<sup>12</sup> VP8 and VP9 PoE Louise Ward

<sup>13</sup> Paragraph 6.21 PoE Chris Enderby

added significance particularly as it will be experienced by all those travelling between Chilworth, and North Baddesley whether by foot, car or public transport.

*Other policy and other considerations*

33. It is undisputed that the proposed development falls outside of the settlement boundary defined by the settlement hierarchy of Policy COM2. It is a core planning principle set out in paragraph 17 of the Framework that the countryside should be recognised for its intrinsic character. It is also undisputed that the Key Service Centre of North Baddesley is able to offer a wide range of facilities and that the location of the site is such that these would be easily accessible to future residents of the proposed development. Nonetheless, implicit in the delineation of the settlement boundary and the plan led system, as stated in the Framework, is that there is clarity that market led housing development may in principle be acceptable on one side of a boundary ie within the settlement, and not on the other ie within the open countryside, unless material considerations indicate otherwise. In defining a settlement boundary, as part of the settlement strategy the Council has provided for sustainable development as a whole, to include, social, economic and environmental dimensions.
34. I note that the appellant argues minimal visual impacts, and the high level of accessibility of the site to facilities. However, these are not matters that would weigh in the balance to overcome the policy objection to development in the open countryside, which does not accord with any of the criterion set out in the policy, and which the appellant accepts is up to date, and full weight should be given to it.
35. The appellant has not argued that the Council is unable to provide a five year supply of deliverable housing sites. However, it considers that the housing supply of deliverable sites is more marginal than that set out in the Council's evidence, although no substantive evidence was put forward to support this position. However, even were I to agree that this is the case, both parties within the SoCG and during the Inquiry were of the view that there is a five year supply of deliverable housing sites and this does not alter my conclusions in relation to the appeal.
36. I have been referred to a number of appeal decisions where reference has been made to the Government's objective to boost significantly the supply of deliverable housing sites, irrespective of whether a Council is able to demonstrate that it has a five year supply of deliverable housing. Consequently, it is argued that either, moderate or substantial weight should be attached to the provision of additional market housing and that substantial weight should be accorded to the provision of affordable housing.
37. I have carefully considered the appeal decisions to which I have been referred, including the Secretary of State's decision (ID3), and the recent appeal for five dwellings close to North Baddesley<sup>14</sup>, which from what I have read did not lie within a Local Gap. However, I have not been provided with all the circumstances of each of the cases. Moreover, in the context of this appeal before me the Council has an agreed deliverable five year housing land supply, and an up to date local plan, which has been formulated and

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<sup>14</sup> APP/C1760/W/15/3131717

examined in the context of the five bullet points set out under Paragraph 47 of the Framework to boost significantly the supply of housing. I have also taken note of the recent appeal decision at Rownhams<sup>15</sup>.

38. The EI found the levels of market housing proposed to be delivered within the Test Valley to be sound, when balanced against wider sustainability matters, such as the need to curtail significant out- commuting, and a need for affordable housing, over and above that which could be delivered through the proposed levels of housing within the Plan period. Therefore, in the context of the particular circumstances before me I attach little weight to the delivery of the market housing within five years of my decision, and moderate weight to the social benefit of the associated affordable housing.
39. I have been referred to the economic benefits to be derived from the construction of up to 33 dwellings of 80 jobs, and the economic benefit of the support to local businesses through increased custom, and revenues from New Homes Bonus and taxes and accord them moderate weight.
40. The active management of the two SINCs and Ancient Woodland are necessary to mitigate the impact of the proposed development on conservation interests, as is the employment of someone to actively manage the green infrastructure. Therefore, I have accorded minimal weight to any additional environmental benefit accrued from the proposed mitigation.
41. Similarly, I am aware that open space provision to serve the development is to be delivered through the Community Infrastructure Levy and that the open space which is to be provided on the land adjacent to the site is as a means of mitigating recreational pressure on the Emer Bog SAC, and New Forest SPA/SAC. Therefore, whilst I acknowledge that the four hectares of open land will be accessible to the residents of North Baddesley I only accord the benefit limited weight.
42. I accord limited weight to any additional environmental benefit of any additional planting and minimal benefit to the proposed sustainable urban drainage system as it would be required as part of the proposed development. Similarly, any positive impact on carbon emissions from the development, including the provision of electric charging points should be accorded limited weight as these could be provided elsewhere.
43. I have considered the contributions to be provided through the Planning Obligation and conclude that the contributions towards the Solent and Southampton Water SPA, SANG Mitigation Land, including its management, affordable housing and the provision of the financial contribution towards the provision of new school places are both necessary and directly relate to the proposed development and accord with the provisions of the CIL Regulations. I have addressed the weight to be ascribed to any of the contributions above except for the financial contribution for the provision of school places at North Baddesley Infant and Junior Schools which would directly mitigate the impact of the development and has no wider benefit.
44. *Other matters*
45. I have been referred to a number of objections made by other interested parties including private individuals, as well as those from Chilworth and

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<sup>15</sup> APP/C1760/W/15/3139021



North Baddesley Parish Councils, Romsey and District Society, Hampshire and Isle of Wight Wildlife Trust and the Chair of Governors of the North Baddesley Junior School. However, it is clear from the officer's report and the Statement of Common Ground that there are no 'technical' objections from the statutory consultees, subject to the execution of the planning obligation and the imposition of conditions, technical matters could be resolved including highway matters, flooding and biodiversity issues.

### **Planning Balance and Conclusion**

46. I have been referred to a number of Court decisions, planning appeals, a decision made by the Secretary of State and the provisions of the Framework. I have also been referred to a number of publications, such as Fixing the foundations: Creating a more prosperous nation, the proposed changes to the National Planning Policy Framework, and the Report of the Local Plans Expert Group and the House of Lords Select Committee Report, Building More Homes. However, none of the above alter the requirement within S(38)6 of the Planning and Compulsory Purchase Act 2004 that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
47. There is no disagreement that the plan is up to date and consistent with the Framework. I have been referred to the presumption in favour of sustainable development both as a principle running through the Framework and as set out in Policy SD1 of the LP.
48. Policy SD1 of the LP requires development that accords with the policies in the LP to be approved without delay, or where there are no applicable policies that are relevant to the application or the relevant policies are out of date then the Council should grant permission. Given that I have concluded that the proposed development significantly conflicts with Policy E3 of the LP, is contrary to E2 of the LP and it does not represent a form of development which is appropriate in the open countryside, the proposal is clearly contrary to Policy COM2 of the LP. Consequently, in turn the proposed development must be contrary to Policy SD1 of the LP.
49. However, I have been referred to the alleged limited harm of the proposed development and the extent to which it breaches the policies of the Plan. Even were I to accept, which I do not, that the proposed development would have little adverse impact on the purpose of the Local Gap and landscape policies of the LP, the positive benefit of the scheme, which I have found above, would not outweigh the substantial weight which I accord to the provisions of Policy COM2 of the LP.
50. Moreover, following the plan led system, which the Framework promotes as a core principle, the primary mechanism to achieve a boost in the housing supply in a sustainable manner is through the housing and development strategy of the examined and adopted LP. Through the local plan process, settlement boundaries of the Test Valley have been fixed and environmental constraints defined, such as those set out in the Local Gap policy. Both parties are agreed that full weight is to be given to its policies. The Local Plan provides the spatial representation of what is considered to be sustainable development as a whole, encompassing the economic, social and environmental dimensions.

51. Consequently, whilst I have been referred to the social, environmental and economic benefits of the scheme, which I accept are in some cases moderate. Nonetheless, I conclude that these benefits do not outweigh the harm to the development strategy, including the specific and long standing identification of the appeal site as part of the Local Gap.
52. Therefore, for that reason, and having taken into account the appeal decisions, court judgements and from what I have seen, read and observed I conclude that the proposed development conflicts with the development plan and fails to represent sustainable development for the purposes of the Framework. I therefore conclude that the appeal should be dismissed.

*L. Nurser*

INSPECTOR

Richborough Estates

## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY:

Mr Robert Williams	Of Counsel, instructed by Keith Harrold, Principal Solicitor for the Borough of Test Valley
He called	
Karen Eastley, BSc, Msc, MRTPI	Planning Officer
Louise Ward, BA (Hons), Dip LA, CMLI	Senior Landscape Architect
Astrid Jahn, BA(Hons), MA, MRTPI, MCMI	Senior Planning Officer

### FOR THE APPELLANT:

Mr Satnam Choongh	Of Counsel, instructed by Jacqueline Mulliner of Terence O'Rourke Ltd.
He called	
Jacqueline Mulliner, MRTPI	Director of Terence O'Rourke Ltd
Chris Enderby CMLI	Director Enderby Associates Ltd.

### INTERESTED PERSONS:

Mrs Anne Tupper	On behalf of North Baddesley Parish Council
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### DOCUMENTS

- 1 Guidelines for Landscape and Visual Impact Assessment-Appellant
- 2 Appeal decision APP/N1730/W/3127962 at Moulsham Lane, Yateley, Hampshire.
- 3 Secretary of State's Decision: APP/H3510/V/14/2222871, land at Hatchfield Farm, Fordham Road, Newmarket.
- 4 Appeal decision APP/F1040/W/15/3033436 land at Valley Road, Overseal, Swadlincote, Derbyshire.
- 5 Statement of Common Ground between Test Valley Council and Terence O'Rourke on behalf of the appellant.
- 6 Public Open Space Audit 2012 Test Valley Borough Council
- 7 Aerial photograph land at Roundabouts Copse with Local Gap and appeal site identified.
- 8 Community Infrastructure Levy Regulations 2010 (as amended) Compliance Note.
- 9 Statement by Mrs Ann Tupper on behalf of North Baddesley Parish Council.
- 10 Email from Chairman of North Baddesley Parish Council giving Mrs Tupper right to speak on behalf of PC.
11. Extract from Journal of Planning and Environment Law 2016, Case Comment Wychavon DC v Secretary of State for Communities and Local Government [2016] EWHC 592 (Admin).
- 12 Completed Section 106.

- 14 Explanatory Note regarding will of Richard Andrew Dibben.
- 14 Agreed Proposed Conditions
- 15 List of Core Documents

PHOTOGRAPHS

- 1 Photographs presented by member of the public

Richborough Estates