



The Planning Inspectorate

Appeal Decision

Site visit made on 7 August 2018

by S Harley BSc(Hons) MPhil MRTPI ARICS

an Inspector appointed by the Secretary of State

Decision date: 7th September 2018

Appeal Ref: APP/V2635/W/18/3194117

Land off Cheney Hill, Heacham

- 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 W.H. Kerkham (Rhoon) Ltd. against the decision of King's Lynn and West Norfolk Borough Council.
 - The application Ref 16/01385/OM, dated 31 January 2017, was refused by notice dated 4 August 2017.
 - The development proposed is residential development of up to 64 dwellings.
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Decision

1. The appeal is allowed and planning permission is granted for residential development of up to 64 dwellings on Land off Cheney Hill, Heacham in accordance with the terms of the application Ref 16/01385/OM, dated 31 January 2017 and the plans submitted with it subject to the conditions set out in the attached schedule.

Procedural Matters

2. A planning application was originally made for up to 133 dwellings. It was amended during the course of determination to exclude land that had previously been granted planning permission for up to 69 dwellings¹ (the 2016 permission). The Council determined the application on that basis. I will consider the appeal in the same way.
3. The application is submitted in outline with all matters reserved except for the access onto Cheney Hill and emergency access onto Malthouse Crescent. Accordingly I treat the submitted Master Plan as illustrative of only one way in which the site could be developed. An Agreement, dated 24 July 2018, under s106 of the Town and Country Planning Act 1990 (as amended) accompanies the proposal. This provides for affordable housing; sustainable urban drainage maintenance; the Habitats Mitigation Fee; and public open space.
4. The development plan for the area includes the King's Lynn & West Norfolk Borough Council Local Development Framework – Core Strategy 2011 (CS Policies) and the Site Allocations and Development Management Policies 2016 (SADMP). The Council has commenced a review of these with a view to the preparation of a Local Plan to guide development up to 2036. The Parish

¹ 15/00352/OM

Council have commenced the preparation of a Neighbourhood Plan. Neither of these has progressed sufficiently to attract weight in the context of this appeal.

5. The National Planning Policy Framework 2012 (the original Framework) was revised in July 2018 (the Framework). The main parties have had the opportunity to consider the revised Framework and I have taken into account comments submitted.

Background and Main Issues

6. The main issues are: whether the site is appropriate for the proposed development in the light of national and local planning policies having regard to the spatial strategy, location and settlement hierarchy; and the effect of the proposed development on the safety and convenience of users of the highway network in the locality.

Reasons

Spatial strategy, location and settlement hierarchy

7. The appeal site is some 3 hectares of agricultural land beyond, but in part adjoining, the settlement boundary and the built up edge of Heacham. Heacham is set in gently undulating agricultural land with higher land to the east. The A149 forms the boundary to the Norfolk Coast Area of Outstanding Natural Beauty (AONB). This is some distance from the appeal site.
8. The proposed development would have a density of some 21-22 dwellings per hectare (dph). The illustrative Master Plan shows substantial planting and open space which would provide a spacious setting and integrate the proposed houses in the landscape. The appeal site is adjacent to existing or proposed development on three sides. Due to the land levels and intervening farmland, hedges, trees and buildings the proposed development would not be particularly intrusive in distant views, with limited glimpsed views from the A149 and from the access to the Civic Amenities site on the ridgeline to the east or the Chalk Pit. The proposed development would be visible from the adjoining Marea Meadows and the dwellings of the 2016 permission. However, I find there would be no harm to the wider landscape or the scenic beauty of the AONB.
9. The CS predates the original Framework. Its spatial vision and policies, including CS01 and CS09 and Policy DM1 of the SADMP, seek to foster sustainable communities and to focus greater levels of growth in those settlements where there is a wider range of services, employment and transport to support a larger population. These policies are therefore consistent with the balanced approach to sustainable development set out in the Framework.
10. Policy CS02 establishes a six tier settlement hierarchy with major growth focussed in the Sub-regional centre of Kings Lynn and in main towns, with generally only modest scales of new development in rural areas. Heacham is identified as a fourth tier Key Rural Service Centre. In these limited growth of a scale appropriate to secure the sustainability of each settlement is supported.
11. Policies CS01, CS06 and CS09 envisage that at least 2,880 new homes will be delivered in Key Rural Service Centres, with specific allocations for at least 660 of these. The SADMP sets out what the Council considers to be the appropriate

scale of development for settlements to secure a sustainable balance between available services and population size².

12. Heacham is a few miles from the main town of Hunstanton. These communities are connected by the main A149 coast road. Heacham has two shopping areas, a small parade along Station Road and the High Street, a nursery/infant school, a primary school, a GP surgery, a church and good public transport links to King's Lynn and Hunstanton. With these facilities, and as one of the largest of the Key Rural Service Centres, the housing allocation for Heacham is approximately double the average if the 660 total was spread evenly across Key Rural Service Centres.
13. The two allocations for Heacham in the SADMP are at least 60 dwellings on a 6 ha site off Cheney Hill and at least 6 on a site of 1.3 ha to the south of St Mary's Close (Policies G47.1 and G47.2 respectively). The appeal site comprises about half the site area of the allocation at Policy G47.1. The remainder of the allocated land, between the appeal site and Cheney Hill, has planning permission for 69 dwellings under the 2016 permission. With the appeal site proposal this would amount to more than double the Heacham allocation.
14. In considering the SADMP the Examining Inspector was concerned that the Council's approach towards the density of the residential allocations lacked clarity. As explained in the Planning Committee Report in relation to this proposal the reason for the large site allocation was to provide an opportunity for options in relation to design and open space to be explored. For Heacham the Examining Inspector found the site allocations to be sound but that additional development at the School Road site³ beyond that already allocated would not contribute towards achieving sustainable patterns of development.
15. The Cabinet Report on 9 September 2015 sets out the Council's intentions if some allocated sites deliver fewer dwellings than expected. Amongst other things the potential for some allocations to accommodate more than the number specified; bringing forward sustainable sites beyond the planned allocations to bolster supply; and early review of the LP were endorsed. The G47.1 allocation was identified as a site which could potentially accommodate more dwellings than allocated provided the criteria set out in Policy G47.1 would be satisfied.
16. The site is within Flood Zone 1 (lowest risk of flooding) and the proposal would incorporate sustainable urban drainage measures. The illustrative Master Plan for the appeal site and the site of the 2016 permission shows about double the extent of open space that would be required to meet the standards to limit recreational pressure on nature conservation sites and to protect and expand habitats. In these ways the proposal would meet the criteria of Policy CS08 of the CS and of Policy G47.1 of the SADMP. There are no objections from statutory consultees and Community Infrastructure Levy (CIL) could be collected to address matters including health and education. For these reasons I conclude that the site is capable of accommodating more houses than originally envisaged without undue harm.

² according to the 2011 Census

³ APP/V2635/W/14/2221650 in May 2016 a care home, housing with care facilities and some 70 general needs dwellings

17. I have seen no evidence to indicate that the overall cumulative scale of growth in the rural areas grossly exceeds the stated amount of development envisaged in the spatial strategy or that the proposed development could not be absorbed without great impact on the existing character and social make-up of the settlement. Efficient use of an allocated site in this way helps safeguard other sites from speculative development proposals.
18. Moreover, the Inspector in the School Road appeal acknowledged that the allocations in the SADMP, extant permissions and windfall potential within Heacham provide ample scope for local housing need to be met in a sustainable way. This led to the conclusion that the development on unallocated land could be dismissed. I concur with my colleague in the view that any re-consideration of Heacham's role as Key Rural Service Centre, as suggested by the appellant in the School Road appeal, should be a matter for the forthcoming Local Plan Review. However, this does mean that higher numbers on an allocated site should automatically be refused if it can be demonstrated that higher numbers can be satisfactorily accommodated.
19. For the reasons set out above I conclude that, whilst the proposal would conflict to some extent with the spatial strategy it would otherwise satisfy the criteria of Policies CS01, CS06, CS08, DM01 and G47.1. Although Heacham is a fourth tier settlement it is second biggest of the Key Rural Service Centres and has a range of accessible services. The proposal could be satisfactorily accommodated within the site without harm to the character and appearance of the area and provision is made for infrastructure through a s106 Agreement and CIL payments. On this basis I find no reason to suppose that the proposal would harmfully unbalance the carefully considered spatial strategy even though such growth would ordinarily be ascribed to a higher tier settlement. Accordingly I conclude that the site would not be inappropriate for the proposed development having regard to the spatial strategy, location and settlement hierarchy.

Safety and convenience on the highway network

20. The proposed development would use the same access point onto Cheney Hill as the 2016 permission, together with a pedestrian, cycle and emergency vehicle access off Malthouse Crescent. There would be reasonable pedestrian and cycle access to the existing services and facilities in Heacham so that future residents would not have to rely entirely on the private vehicle for day-to-day needs.
21. The Highway Authority is satisfied with the visibility that can be achieved for the access notwithstanding the topography and layout of Cheney Hill. The proposal also includes improvements to the footways at the new junction; at the junction of Malthouse Crescent and Cheney Hill; outside Malthouse Barn; and at the junction of School Road and Marea Meadows. These would improve footpath capacity and increase safety for pedestrians including children entering the school through the Cheney Hill pedestrian gate. I also understand that a pedestrian crossing attendant is present during the busiest times.
22. I was unable to visit during these times, as the school was closed for the summer holidays, but I have experienced similar congestion elsewhere. I acknowledge the strength of feeling concerning vehicle movements and parking at school starting and finishing times. However, although the effects of these are highly concentrated, there are of relatively short duration during the day

and during term time only. I acknowledge that the Highway Authority raises no objections in these respects and, given that such congestion can also be managed in other ways, I find the additional vehicle movements and parking likely to be associated with the proposed development would not cause such additional congestion or conflict with school traffic at/near the proposed junction as to justify refusal on these grounds.

23. As my visit was during the holidays I was able to observe holiday traffic on the local highway network including the A149. A Transport Statement, including a vehicle speed survey, accompanies the proposal. The evidence indicates two recorded accidents in close proximity to the site for the most recent five year period. Cheney Hill is one of the main routes from the village, via Lamsey Lane, to the A149. A new Lidl store has recently opened on the A149 and development is under way for 166 houses at the Hopkins Homes site⁴. It is not clear from the evidence that the effects of these have been fully taken into account in terms of the impact on the flow of traffic on the local network. I acknowledge that the vehicular movements associated with 64 more dwellings would cause additional traffic on the local network which could add to inconvenience for other road users. However, the additional impact of this level of vehicular movements would not be so severe or unsafe as to justify refusal in the context of Paragraph 109 of the Framework and I note that the Highway Authority has raised no objections in this respect.
24. For the reasons set out above I conclude that the effect of the proposed development on the safety and convenience of users of the highway network in the locality would not be unacceptable. Accordingly I find no conflict with Policy CS11 of the CS and Part 9 of the revised Framework in these respects.

Local Infrastructure

25. The appellant has submitted a signed and dated s106 agreement which contains a number of planning obligations providing for affordable housing; sustainable urban drainage maintenance; the Habitats Mitigation Fee; and public open space. From the available evidence presented to me I consider that the proposed contributions would be lawful against the requirements of the statutory tests set out in the CIL Regulations 2010.
26. Concern has been expressed about the capacity of local health services. However, I have seen no evidence from the National Health Service commissioning group to demonstrate this. Moreover CIL contributions could be collected and used for local infrastructure.

Other Matters

27. I acknowledge the local strength of feeling and the expressed confusion about the apparent disparity between the numbers of allocated houses compared to the extent of land allocated. This is especially so given the commencement of preparation of a Neighbourhood Plan.
28. The development of 60 houses on 6 ha would amount to a density of 10 dph which would not be the efficient use of land sought by Paragraph 122 of the Framework. The appeal site would not be unique in terms of increased amounts of development being permitted on allocated sites, some of which increases are

⁴ Planning reference 14/01022/FM

much greater in comparison to allocated numbers⁵ than would be the case here. The Council's Local Plan Task Group report in January 2017 summarised the positive role that the 'at least' wording is playing in helping maintain a healthy supply of deliverable housing land and boosting housing land supply in line with the requirements of the Framework. Moreover increased numbers on allocated sites helps defend other non-allocated sites from speculative development.

29. Planning policies can pull in different directions. I acknowledge that Paragraph 15 of the Framework advises that "*The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings*". However, given the Government's commitment to substantially boost the supply of housing; the appeal site is part of a land allocation which has been through public consultation; and that the proposal satisfies the criteria for sustainable development; I find these matters do not lead me to any other conclusion.

Planning Balance and Conclusion

30. The site is within Flood Zone 1, at lowest risk of flooding. Matters such as sustainable urban drainage, open space, and habitat protection have been addressed as required by Policy CS08 of the CS and Policy G47.1 of the SADMP. CIL could be collected that could address health, education and other infrastructure provision. Occupants of the proposed dwellings would have reasonable access to those services and facilities that are available in Heacham, including the nearby primary school, without being overly reliant on the private vehicle. More residents would be likely to help sustain those shops and services that are available.
31. The proposed development would boost the supply of housing including the provision of 20% affordable housing as required by Policies CS09 and G47.1. There would be economic benefits in terms of employment during construction and spend in the local economy. Areas of public and recreational open space would be provided. These are all factors that weigh substantially in favour of the appeal proposal.
32. I acknowledge that there is some conflict with the spatial strategy set out in Policies CS01, CS04 and CS08 of the CS and Policy G47.1 of SADMP in that the quantum of development would be approximately double that originally envisaged. However, the numbers are a minimum and the proposal otherwise satisfies the criteria set out in Policies CS01, CS06, CS08, DM01 and G47.1. Moreover, it is clear that increasing numbers on allocated sites is helping to secure the currently healthy housing land supply and to resist development on unallocated sites such as School Road. I have found no conflict with Policy CS11. In this case I conclude that, on balance, the benefits from the appeal proposal are sufficient to outweigh the partial conflict with the quantum of development and would therefore not undermine the spatial strategy as a whole.
33. For the reasons set out above, and taking into account all other material planning considerations raised, I conclude the appeal should succeed.

⁵ increases as much as 500-700% Methwold G59.1 and Outwell G104.5

Planning conditions

34. I have had regard to Paragraph 55 of the Framework and the national Planning Practice Guidance in respect of the use of planning conditions and those suggested by the main parties.
35. Conditions relating to the submitted plans, time limits for implementation and submission of reserved matters, and limitations on housing numbers are necessary to provide certainty. Shorter timescales for implementation of development than normal are not necessary given the available five year housing land supply.
36. Conditions requiring the submission of details for proposed roads, footways, visibility splays and off-site highway improvements are necessary in the interests of highway safety. For similar reasons, and to protect the living conditions of nearby occupiers, the submission of details relating to management during construction are reasonable and necessary.
37. Conditions relating to potential contaminated land surveys; drainage including Sustainable Urban Drainage Systems; and the provision of fire hydrants; are necessary in the interests of public health and safety and to reduce the risk of flooding.
38. Conditions relating to external lighting, a walk over survey, landscaping, including measures to retain trees and hedges are necessary in the interests of the appearance of the area, to retain and extend habitats, to reduce the effect on wildlife and to minimise light pollution.
39. A condition requiring an archaeological investigation is necessary to safeguard archaeological interests.

S Harley

INSPECTOR

Schedule of Conditions

- 1) Details of the appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the 'Site Location Plan Phase 2' No HKN THA EX GA 001 P3.
- 5) The development shall comprise of no more than 64 residential units.
- 6) No development shall commence until details of arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the local planning authority. The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established.
- 7) No works shall commence on the site until such time as detailed plans of the roads, footways, foul and surface water drainage have been submitted to and approved in writing by the local planning authority. All construction works shall be carried out in accordance with the approved plans and no dwelling shall be occupied until the approved works have been completed.
- 8) No works shall be carried out on roads, footways, foul and surface water sewers otherwise than in accordance with the specifications of the local planning authority in consultation with the Highway Authority.
- 9) Before any dwelling is first occupied the road(s) and footway(s) shall be constructed to binder course surfacing level from the dwelling to the adjoining County road in accordance with the details approved in writing by the local planning authority.
- 10) Prior to the first occupation of the development hereby permitted a visibility splay measuring 2.4m x 43m shall be provided to each side of the access where it meets the highway and such splays shall thereafter be maintained at all times free from any obstruction exceeding 0.225 metres above the level of the adjacent highway carriageway.
- 11) Prior to the commencement of any works on site a Construction Traffic Management Plan, to incorporate details of on-site parking for construction workers, access arrangements for delivery vehicles and temporary wheel washing facilities for the duration of the construction period shall be submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved Management Plan.

- 12) For the duration of the construction period all traffic associated with the construction of the development shall comply with the Construction Traffic Management Plan.
- 13) Notwithstanding the details indicated on the submitted drawings no works shall commence on site until a detailed scheme for the off-site highway improvement works as indicated on drawing numbers 1603- 50-PL07(C), 1603-50-PL04(B), 1603-50-PL05(B), 1603-50-PL06(B) & 1603-50-PL08(B) have been submitted to and approved in writing by the local planning authority. Prior to the first occupation of the development hereby permitted the off-site highway improvement works shall be completed in accordance with the approved scheme.
- 14) Prior to the first occupation of the development hereby approved, a detailed outdoor lighting scheme shall be submitted to and approved in writing by the local planning authority. The scheme shall include details of the type of lights, the orientation/angle of the luminaries, the spacing and height of the lighting columns, the extent/levels of illumination over the site and on adjacent land and the measures to contain light within the curtilage of the site. The development shall be implemented in accordance with approved scheme and thereafter maintained and retained as approved.
- 15) Prior to commencement of development a detailed construction management plan, shall be submitted to and approved in writing by the local planning authority; this must include proposed timescales and hours of construction phase. The scheme shall also specify the sound power levels of equipment, their location, and proposed mitigation methods to protect residents from noise and dust. The scheme shall be implemented as approved.
- 16) No demolition/development shall take place until a Written Scheme of Investigation has been submitted to and approved in writing by the local planning authority. The scheme shall include an assessment of significance and research questions: and
 - i) the programme and methodology of site investigation and recording;
 - ii) the programme for post investigation assessment;
 - iii) the provision to be made for analysis of the site investigation and recording;
 - iv) the provision to be made for publication and dissemination of the analysis and records of the site investigation;
 - v) the provision to be made for archive deposition of the analysis and records of the site investigation;
 - vi) the nomination of a competent person or persons/organization to undertake the works set out within the Written Scheme of Investigation.
- 17) No development shall commence until details of both hard and soft landscape works have been submitted to and approved in writing by the local planning authority. These details shall include:
 - i) earthworks showing existing and proposed finished levels or contours;
 - ii) provision for the retention of existing trees, hedges and shrubs;

- iii) means of enclosure and retaining structures;
- iv) boundary treatments;
- v) vehicle parking layouts;
- vi) other vehicle and pedestrian access and circulation areas;
- vii) hard surfacing materials;
- viii) minor artefacts and structures [e.g. furniture, play equipment, refuse or other storage units, signs, etc.];
- ix) proposed and existing functional services above and below ground [e.g. drainage, power, communications cables, pipelines etc. indicating alignments, levels, access points, supports as relevant];
- x) an implementation programme, [including phasing of work where relevant]
- xi) a landscape management plan including long-term design objectives, management responsibilities, management and maintenance schedules for all landscape areas and swales, (other than small privately owned, domestic gardens).

The landscaping works shall be carried out in accordance with the approved details in accordance with the agreed implementation programme. The completed scheme shall be managed and maintained in accordance with the approved landscape management plan.

- 18) No existing trees, shrubs or hedges within the site that are shown as being retained on the approved plans shall be felled, uprooted, wilfully damaged or destroyed, cut back in any way or removed without the prior written approval of the local planning authority. Any trees, shrubs or hedges removed without such approval or that die or become severely damaged or seriously diseased within 5 years from the completion of the development hereby permitted shall be replaced with trees, shrubs or hedge plants of a similar size and species in the next available planting season, unless the local planning authority gives written approval to any variation.
- 19) Notwithstanding details contained within other conditions attached to this planning permission or unless otherwise agreed in writing by the local planning authority prior to commencement of development no removal of hedgerow, trees or scrub shall be undertaken during the nesting bird season (March-August inclusive). If any construction works are to be undertaken within the breeding bird season a nesting bird check shall be undertaken by an ecologist immediately prior (within 24hrs) to removal of suitable nesting habitat. Should nests be found hedgerow, trees or scrub shall be removed and no works shall take place until such time as the nests are no longer being used.
- 20) Prior to the commencement of any development on the site a badger walkover survey shall be undertaken by an ecologist to ensure no setts have been dug since the 2016 survey. Should any evidence of protected species be found no development shall commence until a Habitats Regulations Assessment together with a scheme of measures for mitigation as appropriate has been completed and submitted to and approved in writing by the local planning authority. The development shall be carried out in complete accordance with the approved scheme.

- 21) No dwelling shall be occupied until a scheme for the provision of a fire hydrant has been implemented in accordance with a scheme that has previously been submitted to and approved in writing by the local planning authority.
- 22) No development shall commence until an assessment of the risks posed by any contamination, including any asbestos, has been carried out in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency's Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), shall have been submitted to and approved in writing by the local planning authority. If any contamination is found, a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for the approved development shall be submitted to and approved in writing by the local planning authority. The site shall be remediated in accordance with the approved measures and timescale and a verification report shall be submitted to and approved in writing by the local planning authority. If, during the course of development, any contamination is found which has not been previously identified, work shall be suspended and additional measures for its remediation shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures and a verification report for all the remediation works shall be submitted to the local planning authority within 28 days of the report being completed and approved in writing by the local planning authority.
- 23) Prior to the commencement of development, a new surface water drainage scheme incorporating the following measures and taking into account the development on land granted planning permission Ref 15/00352/OM, shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented prior to the first occupation of the development. The scheme shall address the following matters:
 - a) Detailed infiltration testing in accordance with BRE Digest 365 along the length of the proposed attenuation storage.
 - b) Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 1 in 100 year return period, including allowances for climate change, flood event.
 - c) Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the: * 1 in 30 year critical rainfall event to show no above ground flooding on any part of the site.
* 1 in 100 year critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any above ground flooding from the drainage network ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development.
 - d) The design of the attenuation basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise

the risk to people and property during rainfall events in excess of 1 in 100 year return period. This will include surface water which may enter the site from elsewhere.

- e) Revised FRA noting the risk of surface water flooding within the site boundary and stating how this risk will be mitigated. Ideally properties will be located outside of the areas of risk, as avoidance is always the best approach to mitigating flood risk. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding.
- f) Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C697, 2007), or the updated The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.
- g) A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

End of Schedule

Richborough Estates