

Planning Applications Committee

Section B

10th July 2008

Agenda Number:	B1
Section/Area:	OUTER
Ward:	TOWNCL
Officer:	Neil Campbell
Valid Date:	2nd May 2008
Application Number:	08/419/C & 08/00420/F
Site Address :	Norwich City College, Ipswich Road, Norwich. NR2 2LL
Proposal:	Remove existing prefabricated terrapin educational building and erection of new eco-style construction.
Applicant:	Norwich City College
Agent:	Crispin Lambert Architecture

THE SITE

The application site is located south east of Ipswich Road at the junction with Cecil Road, within the Newmarket Road Conservation Area. The site is an established educational facility. The main site access is at the western end of the site frontage to Cecil Road. The site is bordered by a residential property on Cecil Road and the City College campus to the North. The site includes a number of educational buildings, including the Thetford building and prefabricated terrapin temporary classrooms. There is a car parking area on site.

RELEVANT PLANNING HISTORY

The site has been in use for educational purposes for a number of years and planning applications relating to the overall campus have come forward for incremental alterations and improvements to the teaching and on site facilities.

Application **08/00255/O** for redevelopment of College Campus for education use together with associated administrative and ancillary facilities (DI) plus additional atria space together with car parking and landscaping is currently pending consideration.

THE PROPOSALS

Application No. 08/00419/C

The application is for the demolition of an existing prefabricated educational building. The applicant has removed from application 08/00419/C the requirement for deep bore holes for the heat source pumps following advice from officers. A separate application for these works is anticipated.

Application No. 08/00420/F

The application is for the replacement of the existing prefabricated educational building, being put forward for demolition in application 08/00419/C with a new purpose built centre for teaching of a new construction and built environment diploma. The proposed academic building would also be a construction education facility as there will be a display area to take large components and building elements, in order that students can have first hand experience of construction materials.

The maximum height of the proposed two-storey building would be 13 metres with a gross internal floor area of 570 sq. metres.

Both applications have been supported by an Arboricultural Impact Assessment, Design and Access Statement, Sustainability Statement and Bat Survey.

CONSULTATIONS

The application has been advertised on site, in the press and the adjacent occupiers have been notified.

Neighbours:

At the time of writing the report there had been in excess of 30 letters of objection to the application. There has also been one letter of support from a neighbour. All comments have been summarised and appended to the report.

Environment Agency:

At the time of writing the report the Agencies comments are awaited.

Norfolk Wildlife Trust:

At the time of writing the report the Trusts comments in relation to Bats are awaited.

Following receipt of additional technical information (Bat Survey) a second consultation period of 14 day was initiated. The final date for comment was 8th July. I shall update members of any relevant issues raised by the consultees.

PLANNING CONSIDERATIONS

Relevant National Planning Policy

PPS1	Delivering Sustainable Development
PPS1 Supplement	Planning and Climate Change
PPS6	Planning for Town Centres
PPG 15	Planning and the Historic Environment

Relevant East of England Plan Policies:

ENV7: Quality in the built environment

ENG1: Carbon dioxide emissions and energy performance

Relevant Local Plan Policies:City of Norwich Replacement Local Plan

HBEB8 - Development in Conservation Areas

HBE12 – High quality of design, with special attention to height, scale, massing and form of development

EP18 – High standard of energy efficiency for new development

EP19 – Renewable energy development

EP20 – Sustainable use of materials

EP22 – High standard of amenity for residential occupiers

EMP19 – Development of education and training establishments

TRA5 – Approach to design for vehicle movement and special needs

TRA6 – Parking standards – maxima

TRA7 – Cycle parking standards

The main policy relevant to this site in the Replacement Local Plan is EMP19. It allows for educational development on the site subject to:

- Its capacity;
- An assessment of the environmental impact of significant development;
- The need to provide accommodation for full time students. The policy requires the provision of new accommodation for one third of the new student places resulting from the new development.

However, the supporting text encourages any significant expansion to City College to be located away from the existing site, due to potential effects on:

- adjoining uses,
- access issues
- loss of open space.

It encourages the college to provide for growth needs in the city centre as a more sustainable location. This policy text did not consider total redevelopment of the site as is proposed partly in this application and further in the outline planning application reference 08/00255/O yet to be determined by the Council, but was rather concerned with the potential impact of incremental growth on the site through extensions to existing buildings and new buildings. Government policy in PPS6, Planning for Town Centres, does not define education as a town centre use. As a result, there is no need for a sequential test to examine whether a more central location is available for the proposed development.

Therefore the policy is permissive of educational development on the site, whilst the text suggests a city centre location for further educational development may be better. In Local Plans, policy takes precedence over text.

Neighbour Amenity

The two storey block building proposed is set approximately 31 metres from the neighbouring property on Cecil Road and approximately 6 metres from the boundary of Cecil Road. The proposed level of this building, which although slightly above the

average existing site level, is considered to have no material impact on the amenities of nearby residents, and in visual terms is held to be acceptable. Furthermore, this block will be partly screened by existing and proposed planting. The proposed development will not therefore have an unacceptable impact upon its neighbours and is in accordance with policy EP22.

Design and the Conservation Area

The existing building on the site is functionally obsolete and is an unattractive feature in the area. Its removal is seen as beneficial and the new building provides a very interesting for the townscape of the area. It will be an overt statement of environmentally sustainable building and a teaching tool for the students who learn there. Its form will be a contrast to its surroundings but this will not be jarring due to its position behind a tall fence and tree screen and its 2 storey height is consistent with other buildings in the street. It may prompt a curious “double-take” from people who notice it in their peripheral vision and they will be rewarded by the sight of an interesting and carefully considered piece of architecture that will be a positive addition to the conservation area. Its use as a purpose built educational building further justifies its architectural contrast to other buildings on Cecil Road, which are houses of a domestic scale and design. The proposal includes the planting of an additional pollarded lime to the east of the driveway entrance. This will integrate the site frontage and ensure that the view of the building is discreet and filtered through branches and foliage.

This view was endorsed by the Design Quality Panel who: “thought this to be a very interesting proposal and welcomed the initiative to provide education in sustainable building techniques through a building that demonstrated the various systems that could be used.”

The Design Panel had some concerns over the access strategy and wanted to ensure that the building is clearly integrated into the college campus. The plans submitted with the application make the pedestrian access arrangements and links to the college clearer. It will be important that when the detailed planning application(s) for the college campus are received that they demonstrate a convenient connection to the C-Bec building and do not compromise the important trees at the boundary between the main campus and C-Bec.

It would be useful to have dedicated cycle parking for the building rather than relying on the cycle parking on the main campus. Cyclists could then reach the building directly from Cecil Road.

Given the above the design of the building accords with policies HBE8, HBE12 and HBE19.

Transport

Transportation and accessibility local plan policies TRA5, TRA6 and TRA7 apply. The applicant has not allowed provision for cycle parking in the proposal it is considered that cycle parking should be included. There is sufficient space on site for such a facility and this could be secured by condition so that prior to the first occupation of any building forming part of this development, the applicant provides a scheme detailing cycle storage on site.

Policy TRA5 encourages that maximum use is made of shared spaces and surfaces in locations where overall vehicle movements are low. The application has been amended slightly and the previously segregated vehicular routes, pedestrian areas and disabled walkway have been merged so that a more successful exterior environment with a shared mixed use could be achieved. The changes made have resulted in a design which allows for the necessary vehicle movement, together with parking and servicing areas which do not dominate the area, but benefit all users and provide a positive and attractive setting to the development.

Landscape & Trees

The original design had significant arboricultural implications regarding tree loss and the potential for tree root damage. The application has since been amended to address these issues. The revision designates the root protection areas as no-dig areas; the only exception to this is where the proposed footprint of the building conflicts with the perimeter of the root protection area and at these points special engineering of the foundation will be used along with pre-emptive root pruning.

The removal of any trees on site will only be sanctioned if proof of sourcing of appropriate sized trees can be achieved; and a revised Arboricultural Impact Assessment has set this out. Further arboricultural input could be secured by condition to ensure that prior to commencement of operations details of: tree protection during construction, tree replacement, special engineering specifications and related Arboricultural Method Statements are submitted for written approval by the Council.

Bats

The Phase 1 Habitat Survey & Protected Species Risk Assessment submitted in relation to outline application 08/00255/O for the redevelopment of the main College Campus stated that the terrapin building to be demolished had several obvious crevices which could be used by bats. Evidence of a single bat dropping has been found adhering to one of the windows suggesting the possible existence of bats in the area. A Bat Survey forms part of this application which was provided as additional technical information. As set out in the earlier consultation section at the time of writing this report the Bat Survey was out for consultation (Bat Survey). However the survey states that it can be reasonably concluded that the prefabricated building has not recently and is not currently being used by roosting bats. However the droppings found show that bats are in the locality. Therefore should consent be granted it is recommended that demolition should only proceed providing that a precautionary approach is adopted. If any bats are found during the demolition process it would be necessary to halt the work and consult Natural England.

The survey further recommends that the proposed building provides artificial roosts for crevice roosting species of bats, that artificial roost sites be installed into on site trees, and that any artificial lighting proposals take in to account bats sensitivity, these measures can be secured through condition. The application provision for bat protection is therefore consider acceptable subject to suitable conditions.

Sustainability

A sustainability statement has been included with the application. The applicant states that the proposal will be constructed using recycled materials, where possible, and low

energy building materials such as earth blocks, hemp blocks etc. Water consumption will be minimised by the use of low water use fittings, and the building design would be capable of achieving the best possible BREEAM rating for energy efficiency.

Providing that the sustainability techniques included in the development could be secured by condition it is considered that the proposal complies with local plan policies EP18, EP19 and EP20

CONCLUSION

In terms of the principle of redevelopment of the site, it has been widely recognised that the continued use of the present campus site is as an appropriate way of addressing the future education needs for Norwich and the surrounding area.

It is considered that the proposals represent an acceptable form of development that will enhance facilities at the College and will complement the physical development at this end of the Campus, without detriment to the visual amenity of the suburban setting of the College.

RECOMMENDATION

Application Nos. 08/00419/C and 08/00420/F

Subject to no overriding objection from outstanding consultees to

GRANT PLANNING PERMISSION subject to the following conditions:

- 1) Commencement within 3 years;
- 2) Submission of samples of materials
- 3) Boundary treatment;
- 4) Prior approval of details:-
 - Roof, eaves and verge, water goods;
 - Windows, doors, décor panels;
 - Rainwater harvesting
- 5) Surface water disposal;
- 6) Surface water - maintenance scheme:
- 7) Pollution prevention;
- 8) Surface water drainage;
- 9) Cycle/refuse storage provision details
- 10) Tree Protection;
- 11) Landscaping planting and site treatment scheme;
- 12) Maintenance of landscaping;
- 13) Plant and machinery details;
- 14) Fume/Flu details.
- 15) Details of external lighting
- 16) Details of demolition methods including disposal of asbestos
- 17) Bat protection

REASONS FOR APPROVAL

The proposal would result in an appropriate and satisfactory form of development that would further enhance educational and research facilities at the City College Norwich.

The building would relate well to surroundings and would preserve and enhance the character and appearance of this part of the Conservation Area and setting of the Campus, and preserve its overall parkland setting. As such, the proposal would comply with Policies HBE8, HBE12, EP18, EP19, EP20, EP22, EMP19, TRA5, TRA6 and TRA7 of the City of Norwich Replacement Local Plan Adopted Version, November 2004 and policies ENG1 and ENV7 of the East of England Plan, May 2008.

GRANT CONSERVATION AREA CONSENT subject to the following conditions:

- 1 Commencement
- 2 Details of tree protection prior to commencement
- 3 Details of scheme of contract for replacement building prior to demolition

Reason for approval

The proposed demolition of the existing building is acceptable, subject to conditions, as it does not significantly contribute to the character and appearance of the conservation area. The proposed demolition is therefore in accordance with policy HBE8 of the City of Norwich Replacement Local Plan (Adopted November 2004).

Appendix 1

Residents – Summary of Comments

Planning Application Reference Number 08/00419/C
Norwich City College, Ipswich Road. Norwich, NR2 2LJ

Grove Walk

Concerns	Response
Located within a Conservation Area	See report Design and the Conservation Area.
Design is inappropriate in regards to existing character, material, form and scale of surrounding buildings.	See report Design and the Conservation Area.
Proposed building will have a flat roof in contrast to the surrounding pitched roofs. Consequently, it will appear much bulkier.	See report Design and the Conservation Area.
The proposed building materials and rounded form will clash with the angular red brick and tiled roof of properties adjacent.	See report Design and the Conservation Area.
Will look like an industrial building which is inappropriate for a predominantly residential area.	See report Design and the Conservation Area.
Electricity substation appears to be adjacent to a residential property. Could this be relocated?	The transformer will be an 11000V/415VAC - DYN11 conforming to BS EN 60076 and is step down transformer enclosed with an oil filled steel tank. The unit will be housed in an acoustic enclosure. The transformer will be mounted on a concrete bunded base which will prevent any oil contamination. Cooling shall be by natural ventilation. The noise produced by a unit of this small size will be virtually zero. The unit will be mounted on rubber pads to eliminate any vibration. The transformer windings are enclosed in an earthed steel tank which will eliminate any electromagnetic radiation. Care will be taken to ensure no tree roots will be damaged or disturbed. The college have engaged the services of an arbouriculturist to ensure all trees and tree roots are protected. Therefore the location is considered suitable.
The new building will be unsympathetic to the character of the Thetford Building.	See report Design and the Conservation Area.
Loss of open space, gardens and trees. There has been no habitat	Only a small increase in the footprint therefore no requirement for a habitat survey



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Planning Application No- 08/00419/C and 08/00420/F

Site Address - Norwich City College, Ipswich Road

Scale - 1:1250



NORWICH
City Council

DIRECTORATE OF REGENERATION
AND DEVELOPMENT



survey.	although a bat survey has been provided.
Lack of consistency in the plans in regards to tree positioning.	See report Landscape and Trees.
Cecil Road and its junction will not be able to cope with HGV access. Existing traffic and on-street parking will further complicate this and extra air and noise pollution will also be caused. Pedestrian safety could also be at risk.	No objection received from the Highways officers.
Privacy of properties opposite and adjacent to the development will be affected (notably 15 Ipswich Rd; 1a, 1, 2 and 3 Cecil Rd).	See report Neighbour Amenity.
There will be increased light pollution and energy use from the new building.	The applicant will be required to submit a lighting scheme for the approval of the Council.
Could it not be built at the Hewett School? It is in a good location and the school have previously attempted to sell off land.	Not a material consideration.
Does the Thetford Building have permission to be used as a commercial building and does the building insurance take into account the 10/12 vehicles parked in its front garden?	Not relevant to this application.
The City Plan states the site is already overdeveloped.	See report Planning Considerations
The proposal is inconsistent with Local Plan policies and Government Guidance.	See report Planning Considerations

Lady Mary Road

Concerns	Response
Proposed size and style is out of character.	See report Design and the Conservation Area.
At least 13 trees would be lost.	See report Landscape and Trees.
Conflicts with local planning policies.	See report Planning Considerations

Cecil Road

Concerns	Response
Located within a Conservation Area.	See report Design and the Conservation Area.
Design is inappropriate in regards to existing character, material, form and scale of surrounding buildings.	See report Design and the Conservation Area.
Does not respect the form of the surrounding residential property in Cecil Road.	See report Design and the Conservation Area.

Proposed building will have a flat roof in contrast to the surrounding pitched roofs. Consequently, it will appear much bulkier.	See report Design and the Conservation Area.
Will look like an industrial building which is inappropriate for a predominantly residential area.	See report Design and the Conservation Area.
The new building will be unsympathetic to the character of the Thetford Building.	See report Design and the Conservation Area.
Loss of open space, gardens and trees. There has been no habitat survey.	Only a small increase in the footprint therefore no requirement for a habitat survey although a bat survey has been provided.
Cecil Road and its junction will not be able to cope with HGV access. Existing traffic and on-street parking will further complicate this.	No objection received from the Highways officers.
There has been no Traffic Impact Analysis	Not required.
Privacy of properties opposite and adjacent to the development will be affected (notably 15 Ipswich Rd; 1a, 1, 2 and 3 Cecil Rd).	See report Neighbour Amenity.
There is a risk to tree roots.	See report Landscape and Trees.
In 1996 a planning application on the site was refused/withdrawn.	Each application is consider on its individual merits.
Design and materials appear little different than to any modern industrial warehousing or retail shed (Riverside).	See report Design and the Conservation Area.
Concrete cladding will clash with traditional red brick.	See report Design and the Conservation Area.
Inconsistent with Local Plan policy.	See report Planning Considerations
Light pollution will have an impact on the conservation area.	The applicant will be required to submit a lighting scheme for the approval of the Council.
Does little to encourage sustainable transport. Not environmentally friendly	No objection received from the Highways officers.
Will add to the 'rat running' experienced at present.	No objection received from the Highways officers.
Failure to prove need for the development PPG6. Alternative sites have not been properly pursued.	Government policy in PPS6, Planning for Town Centres, does not define education as a town centre use. As a result, there is no need for a sequential test to examine whether a more central location is available for the proposed development. In my view, the proposal addresses promotes local economic and social objectives and as the site is currently being used for an educational use, educational development is acceptable on this site.
Failure to conduct an environmental analysis.	Not required.

Habitats will be lost – bats seen roosting in existing building.	Only a small increase in the footprint therefore no requirement for a habitat survey although a bat survey has been provided. See report Bats.
Cecil Rd is not physically strong enough to handle the development (4 foot hole in the road appeared in April a few metres from the site).	In Norwich numerous examples of subsidence due to poor ground conditions have been recorded historically. These conditions affect particular parts of the City, due both to the nature of the subsoil geological conditions and to historic shallow chalk workings and mines. Research undertaken for the former Department of the Environment by Howard Humphreys and Partners has recommended that the Local Plan should draw attention to these areas and require specific precautions to be taken during development. Planning applications in the affected areas of the City will generally be referred to the City Council's structural engineers for advice on the most effective means of overcoming any potential problems. However this application does not fall within an affected area listed within the local plan therefore policy EP2 is not relevant.
Permanent illumination of the building is inappropriate – HBE19, EP25.	The applicant will be required to submit a lighting scheme for the approval of the Council.
Unclear whether will be used purely for classroom use or practical training. Practical training would mean it would be a permanent, noisy building site.	The applicant has applied for an educational establishment which falls within D1 of the use class order, therefore any educational use would be considered acceptable.
The side elevation towards 2 Cecil Rd creates an unattractive blank wall.	See report Design and the Conservation Area.

Newmarket Road

Concerns	Response
Building will be visually intrusive.	See report Design and the Conservation Area.
Not in context with the surrounding area.	See report Design and the Conservation Area.
Within a conservation area.	See report Design and the Conservation Area.
Local policies ignored.	See report Planning Considerations

Ipswich Grove

Concerns	Response
Within a conservation area.	See report Design and the Conservation Area.
Too modern for the area.	See report Design and the Conservation Area.
Design is inappropriate in regards to existing character, material, form and scale of surrounding buildings.	See report Design and the Conservation Area.
Does not respect the form of the surrounding residential property in Cecil Road.	See report Design and the Conservation Area.
Proposed building will have a flat roof in contrast to the surrounding pitched roofs. Consequently, it will appear much bulkier.	See report Design and the Conservation Area.
Will look like an industrial building which is inappropriate for a predominantly residential area.	See report Design and the Conservation Area.
The new building will be unsympathetic to the character of the Thetford Building.	See report Design and the Conservation Area.
Loss of open space, gardens and trees. There has been no habitat survey.	See report Landscape and Trees. Only a small increase in the footprint therefore no requirement for a habitat survey although a bat survey has been provided.
Cecil Road and its junction will not be able to cope with HGV access. Existing traffic and on-street parking will further complicate this.	No objection received from the Highways officers.
Inconsistent to Local Plan policies.	See report Planning Considerations
There has been no Traffic Impact Analysis.	No objection received from the Highways officers. Not required.
Privacy of properties opposite and adjacent to the development will be affected (notably 15 Ipswich Rd; 1a, 1, 2 and 3 Cecil Rd).	See report Neighbour Amenity.

Cecil Road

Support
We were impressed by the architecture and purpose of the building. Of course any radical change to a residential street is going to be controversial and we sympathise with those who feel that their neighbourhood will change for the worse. We support this bold, important and beautiful building.

Appendix 2

CRC – Summary of Comments

**Planning Application Reference Number 08/00419/C
Norwich City College, Ipswich Road. Norwich, NR2 2LJ**

Concerns	Response
Conflict with Local Plan NE8	See report Planning Considerations
Information contained within the Outline Planning Application (08/00255/O) and sightings of bats by neighbours, suggest that the Terrapin Building and Thetford Building garden have potential of being a bat roost.	See report Bats.
<ul style="list-style-type: none"> • Proposal is in contravention to bat legislation: <ul style="list-style-type: none"> ○ Wildlife and Countryside Act 1981 (as amended) ○ Countryside and Rights of Way (CroW) Act 2000 ○ Natural Environment and Rural Communities Act 2006 ○ The Conservation (Natural Habitats, Etc.) Regulations 1994 <p><i>“Planning Policy Statement 9 on Biodiversity and Geological Conservation (and its accompanying Circular and Good Practice Guidelines) needs to be taken into account when considering planning matters.”</i></p>	See report Bats.
ODPM Circular 06/2005/Defra Circular 01/2005 that accompanying PPS9 states: <i>“...the presence of a protected species is a material consideration when considering a development proposal that could harm the species or its habitat.”</i>	See report Bats.
<ul style="list-style-type: none"> • Phase 1 Habitat Survey and Protected Species Risk Assessment of Main Campus Application support the potential that the Terrapin Building and Thetford Building garden are a bat roost. <ul style="list-style-type: none"> ○ Mature trees across the site hold some potential for bat roosts. ○ Buildings examined and considered to offer the potential to support roosting bats in gaps between fascias and soffits/crevices underneath roof tiles or between brick work. 	See report Bats.

<ul style="list-style-type: none"> ○ Woodland edge habitat likely to be productive foraging habitats for several species of bat. ○ Bats (perhaps Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)) seen flying in vicinity of the Thetford Building and its garden. ● Quoting Habitat Survey... "5.2 Protected Species" <p>College has potential to support species protected at European and National level.</p> <ul style="list-style-type: none"> ○ "There are several buildings and mature trees with the potential to support roosting bats." ○ "Areas of woodland provide valuable foraging and cover for bats, birds and invertebrates." ● "6.2 Phase 2 Surveys" <p>"...be completed prior to the submission of detailed planning applications, and certainly before site clearance and construction works..."</p> <p>Should protected species be found - mitigation measures may be required to comply with nature conservation legislation.</p> ● Bats Legislation <p>If plans impact on buildings or trees that are considered to offer bat roosting potential, an appropriate bat survey should be carried out.</p> <p>Daytime inspections for roosting bats and/or field signs of bats (droppings, urine staining, scratching etc.) in buildings and trees should be combined with bat emergence or re-entry surveys following best practice guidelines provided by the Bat Conservation Trust (BCT 2007).</p> <p>Any loss or disturbance of a bat roost would require adequate mitigation and would need to be undertaken under a European Protected Species (EPS) License to derogate from The Conservation (Natural Habitats, & c.) Regulations 1994.</p> <p>Bat surveys should be completed in advance of development to allow sufficient time to apply for a bat licence.</p>	
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<p>Terrapin Building shows roosting potential.</p> <p>All species of bat are fully protected under the Wildlife and Countryside Act 1981 (as amended) through their inclusion in schedule 5.</p> <p>All bats are included in Schedule 2 of The Conservation (Natural Habitats, & c.) Regulations 1994 (as amended).</p> <p>The Act and Regulations make it illegal to:</p> <ul style="list-style-type: none"> • Intentionally or deliberately kill, injure or capture (take) bats; • Deliberately disturb bats (whether in a roost or not); • Damage, destroy or obstruct access to bat roosts; • Possess or transport a bat or any other part of a bat, unless acquired legally; or • Sell barter or exchange bats or parts of bats. • If roosts are affected by development, an EPS licence from Natural England will be needed to mitigate any detrimental effects. • Erection of new eco-style construction believed to involve the removal of important trees. Including a Rowan and a Birch - species recommended by the Bat Conservation Trust as a good foraging habitat for native bats. • Matter of public record that modern eco buildings do not lend themselves to mitigating measures for bats as more traditional building methods do. • Concern that if there is a bat the effects of the two current Planning Applications, if approved, could detrimentally impact upon the colony. Floodlighting, demolition, pollution etc. • In conflict with current legislation and therefore unlawful. 	
<p>Application should be considered by full Planning Committee, and they should be allowed the opportunity to make a site visit to assess the implications of the loss of trees and amenity to wildlife and residents of Cecil</p>	<p>Site visit to be arranged at the discretion of Members.</p> <p>See report Bats</p>

Road.

Until a full protective species survey has been carried out, we believe this application should be refused as it could endanger and be harmful to a species of bats and their roosts, both of which are protected by law.