DECISION DELEGATED TO HEAD OF PLANNING

Application No:	**H09-0305-26**	**Applicant:**	**Mr R Smith**
Proposal:	Erection of Single Dwelling		
Location:	Adjacent To 72 Wignals Gate Holbeach Spalding		
Terminal Date:	25th May 2026		

Planning Policies

South East Lincolnshire Local Plan - Adopted: March 2019

01	Spatial Strategy
02	Development Management
03	Design of New Development
04	Approach to Flood Risk
10	Meeting Assessed Housing Requirements
11	Distribution of New Housing
17	Providing a Mix of Housing
28	The Natural Environment
30	Pollution
36	Vehicle and Cycle Parking
APPENDIX 6	Parking Standards

National Guidance

National Planning Policy Framework December 2024

Section 2 - Achieving sustainable development
Section 4 - Decision-making
Section 5 - Delivering a sufficient supply of homes
Section 9 - Promoting sustainable transport
Section 11 - Making effective use of land
Section 12 - Achieving well-designed places
Section 14 - Meeting the challenge of climate change, flooding and coastal change
Section 15 - Conserving and enhancing the natural environment

Representations:

	Object	Support	No Obj.	Comments
PARISH COUNCIL	0	0	0	0
WARD MEMBER	0	0	0	0
HIGHWAYS & SUDS SUPPORT	0	0	0	1

SOUTH HOLLAND INTERNAL DRAINAGE BOARD	0	0	0	1
SHDC INTERNAL	0	0	0	1
OTHER STATUTORY BODIES	0	0	0	2

CASE OFFICER ASSESSMENT

Proposal

The proposal seeks full planning permission for a detached dwelling on land at 72 Wignals Gate, Holbeach. The dwelling is proposed to feature 2.5 storeys, with a gable end roof form that measures 8.4m in height up to its ridgeline.

Site Description

The application site comprises part of the garden and driveway at 72 Wignals Gate in Holbeach. There is a pathway to the west of the site that runs to the north of the site where there is an area of public open space. The site is otherwise surrounded by residential development.

The site is within the settlement boundary of Holbeach, as identified by the South East Lincolnshire Local Plan 2011-2036 and accompanying policies map.

The site is within Flood Zone 3, as identified by the Environment Agency's flood risk maps.

Planning History

H09-0817-17: (Outline Application) Residential Development - approved 09 November 2017

H09-0452-18: (Full Application) Use of land to provide access - refused 19 November 2018

H09-0186-18: (Outline Application) Residential development - approved 20 November 2018

The following applications overlap the western side of the site

H09-1268-97: (Outline Application) Residential development including means of access - approved 27 February 1998

H09-0471-00: (Permission Renewal) Residential development, incl. means of access. (renewal of outline application H09/1268/97) - approved 23 October 2000

H09-0065-03: (Reserved Matters) Proposed 58 houses for Phase 2 of development (Outline application H09/0471/00) - approved 17 July 2003

H09-0852-04: (Full Application) Erection of 58 dwellings and associated works - approved 19 August 2004

H09-1573-05: (Full Application) Erection of 30 dwellings and associated works (Plots 66-95) - approved 15 February 2006

Consultation Responses

The responses received from consultees during the consultation period are summarised below. The

responses can be viewed in their entirety on South Holland District Council's website.

Ecology Officer: We request that a total of 1 integrated universal nest brick (e.g., S Brick, Swift Nesting Brick, Manthorpe, Swift Bricks: The 'Universal' Nest Brick - by Dick Newell | CIEEM) in incorporated into the external fabric of the proposed building. This should be located at a height of 4+ m metres, on the north or east elevations to avoid overheating, in accordance with best-practice guidance such as British Standard BS 42021:2022. We also request that one integrated bat box (e.g., Integrated / Built-In Bat Boxes, Integrated Eco Bat Box | The Nestbox Company) is added to the dwelling. In both cases, the authority requires the applicant to submit sufficiently detailed maps that indicate the proposed location of bird/bat boxes on-site and the bricks must be installed during the construction phase and retained thereafter for the lifetime of the development. These are required to enhance biodiversity and to be in line with Local Plan Policy 7.2.14. The proposal is considered to be exempt from BNG (de minimis exemption).

Lincolnshire County Council - Historic Environment: The proposal is unlikely to have an impact on significant archaeological remains. Consequently, no further archaeological input is necessary for this application.

Environmental Protection: I request a standard land contamination condition be applied at this location.

Lincolnshire County Council - Highways and SUDS: The proposed dwelling has 4 bedrooms and the host dwelling has 5. The proposed site plan details 3 spaces for the new dwelling and 2 for the host dwelling. The host dwelling should have 3 parking spaces so one more is required. I question if the red outline should include the proposed parking for the host dwelling.

South Holland Internal Drainage Board:

Byelaw 3 (Surface Water): The applicant has indicated that they intend to dispose of surface water via infiltration, however I cannot see that the viability of this proposal has been evidenced. We recommend that ground investigation is carried out to determine infiltration potential, followed by testing in line with BRE Digest 365 if onsite material is considered favourable for infiltration. If infiltration is not feasible at this site, following the drainage hierarchy we would expect the applicant to propose to discharge surface water to a watercourse. In this case, consent would be required under Byelaw 3. The Board recommend that any discharge is in line with the National standards for sustainable drainage systems (SuDS) published in June 2025. Further to the National Standards for SuDS, the Board's policy is to restrict discharges to 2/l/s/ha or annual average flood flow rate (QBar or QMed), whichever is higher. Please note that any consent granted for the discharge of surface water is likely to be subject to a Surface Water Development Contribution fee (SWDC) as outlined within our Development Control Charges and Fees.

Byelaw 3 (Treated Foul Water): I note that the applicant intends to dispose of foul water to a main sewer. Should the applicant's proposals change to include the discharge of treated foul water to a watercourse, consent would be required under Byelaw 3.

Section 23, Land Drainage Act 1991: I am not aware of any riparian owned/maintained watercourses within or adjacent to the site boundary, however this should be confirmed by the applicant. Should the applicant's proposals include works to alter a watercourse, or if works are proposed to alter a watercourse at any time in the future, consent would be required under the Land Drainage Act 1991 (and byelaw 4).

Byelaw 10: There are no Board arterial watercourses within or adjacent to the site boundary therefore Byelaw 10 does not apply.

Holbeach Parish Council: No response received.

Cllr S E Hutchinsonl: No response received.

Cllr T Carter: No response received.

Cllr N J Chapman: No response received.

Public Representations

This application has been advertised in accordance with the Development Procedure Order and the Council's Statement of Community Involvement. In this instance, no representations have been received from members of the public.

Key Planning Considerations

Development Plan

Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

The adopted South East Lincolnshire Local Plan 2011-2036, adopted March 2019 (SELLP), is the development plan for the district, and is the basis for decision making in South Holland. The relevant development plan policies are detailed within the report above.

The policies and provisions set out in the National Planning Policy Framework, December 2024 (NPPF) are also a material consideration in the determination of planning applications, alongside adopted Supplementary Planning Documents.

There are no adopted Neighbourhood Plans for the area within which the site is located.

The main issues and considerations in this case include the following:

-Principle of Development;
-Impact on the Character and Appearance of the Area;
-Impact on Residential Amenity;
-Highway Safety and Parking;
-Flood Risk;
-Biodiversity Net Gain; and
-Contamination.

These matters are assessed in turn below.

Principle of Development

Policy 1 of the Local Plan sets out the settlement hierarchy in respect of delivering sustainable development, which meets the social and economic needs of the area whilst protecting and enhancing the environment; in order to provide enough choice of land for housing to satisfy local need, whilst making more sustainable use of land, and to minimise the loss of high-quality agricultural plots by developing in sustainable locations and at appropriate densities.

Policy 1 expresses this sustainable hierarchy of settlements, ranking the settlements deemed to be most sustainable in descending order. The most sustainable locations for development are situated within the 'Sub-Regional Centres', followed by 'Main Service Centres'. Lower down the hierarchy are areas of limited development opportunity including Minor Service Centres, with areas of development constraint comprising 'Other Service Centres and Settlements'. The countryside is at the bottom of the settlement hierarchy and represents the least sustainable location.

The site is within the defined settlement of Holbeach which is a Main Service Centre. Policy 1 sets out that within this type of settlement, development will be permitted that supports their role as a service centre for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities.

Furthermore, outline planning approval has already been granted for one dwelling under permission H09-0817-17 on 09 November 2017 and subsequently under permission H09-0186-18 on 20 November 2018. Although no longer extant, these permissions form a material consideration in the determination of the current application.

As the proposal is for one dwelling within a defined settlement, the principle of development is acceptable; however, this is subject to an assessment of the proposals against other relevant material considerations, as set out below.

Impact on the Character and Appearance of the Area

Paragraph 135 of the NPPF states that new development should function well and add to the overall quality of the area (including beyond the short term) and should be visually attractive as a result of good architecture and appropriate landscaping.

Policy 2 of the Local Plan outlines sustainable development considerations for development proposals, providing a framework for an operational policy to be used in assessing the sustainable development attributes of all development proposals.

Policy 3 accords with the provisions of Section 12 of the NPPF, in that it requires development to comprise good design; identifying issues that should be considered when preparing schemes so that development sits comfortably with, and adds positively to, its historically-designated or undesignated townscape or landscape surroundings.

Within the existing street scene on Wignals Gate, there are a variety of house types set within various plots. To the east of the site, there are semi-detached dwellings, whereas to the south and west of the site there are detached dwellings.

The proposal seeks consent for a detached dwelling within the site, between a detached dwelling to the west and a semi-detached dwelling to the east. There is a footpath adjacent to the western boundary of the site.

The proposed dwelling would measure 12m in length and 8.5m in width. A single storey lean-to rear extension is proposed on the northern side of the dwelling, measuring 2m by 7.5m. The dwelling is proposed to feature a gable end roof form, measuring 8.5m in height up to its ridgeline and 5.4m in height up to its eaves.

The dwelling would be positioned relatively close to the site boundaries. For example, the dwelling would be under 1m from both sides of the site. The dwelling would also be positioned further to the rear of the site than No.72, which is a semi-detached dwelling located to the east of the site featuring a hipped roof form.

Due to the proposed height and length of the dwelling, in addition to the proposed gable end roof form, it is considered that the dwelling would be bulkier than the nearest dwellings. Although, the nearest dwelling to the west, No. 78 features a relatively large built footprint, the overall bulk of the dwelling at No.78 is broken up by the varying roof forms and heights. In contrast, due to the overall scale and form the the proposed dwelling and its proximity to the site boundaries, it is considered that the building would be out of keeping with the street scene.

It is considered that the proposal represents an incongruous and cramped form of development, due to the proposed scale and siting of the dwelling. As such, it is considered that the proposal would be out of keeping with the locality, character and appearance of the area, including the surrounding built environment. This would result in an unacceptable impact on the character and appearance of the area. As such, the proposal is considered to be contrary to Policies 2 and 3 of the Local Plan, and Section 12 of the NPPF, which amongst other things, seek to ensure that the design of all development is appropriate to the character and quality of the area.

Impact on Residential Amenity

Paragraph 135 of the NPPF states that development should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Policies 2 and 3 of Local Plan set out that residential amenity and the relationship to existing development and land uses is a main consideration when making planning decisions.

It is considered that there would be sufficient internal living space and external amenity space for the proposed dwelling.

The proposal would result in the subdivision of No. 72 Wignals Gate, leading to a loss of garden space for No.72. Whilst the amount of garden space that would remain would be sufficient in terms of its size for the occupants of No.72, due to the scale and positioning of the proposed dwelling within the site, the remaining garden space would be significantly overshadowed by the proposed

dwelling. This would result in an unacceptable loss of amenity for the occupants of No.72.

It is also considered that the proposed dwelling would have an overbearing impact on No.72 due to the overall scale and siting of the proposed dwelling which would be very close to the site boundary (under 1m). A large blank elevation is proposed on the eastern side elevation of the dwelling which would further exacerbate the harmful impact on No.72.

The western side elevation of the dwelling would be approximately 8m from the side elevation of 78 Wignals Gate. There would be habitable room windows facing directly towards each other and it is considered that the separation distance would be insufficient. Generally, a separation distance of 21m between facing habitable rooms is recommended to maintain a degree of privacy. As such, it is considered that the proposals would result in an unacceptable degree of overlooking between the site and No. 78 to the west of the site.

It is acknowledged that outline planning approval has been granted for a dwelling within the site in 2017 and 2018 under permissions H09-0817-17 and H09-0186-18. However, these applications were in outline form only whereas the current proposal seeks consent for the detailed design of the dwelling. The indicative plans that were provided for the previous applications indicated a smaller dwelling within the site. For application H09-0817-17, the indicative plans showed that the dwelling would not extend as far back into the plot as the current proposed dwelling thereby reducing its impact on the amenity of No. 72.

Therefore, the proposal would result in an unacceptable degree of overshadowing, overbearing and overlooking with neighbouring properties. As such, the proposal is considered to be contrary to Policies 2 and 3 of the Local Plan and Paragraph 135 of the NPPF, which amongst other things, seek to ensure that proposals result in a suitable standard of amenity for residents.

Highway Safety and Parking

Paragraph 116 of the NPPF sets out that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, following mitigation.

Policy 2 of the Local Plan sets out that proposals requiring planning permission for development will be permitted provided that sustainable development considerations are met, specifically in relation to access and vehicle generation. Policy 3 details that development proposals will demonstrate how accessibility by a choice of travel modes including the provision of public transport, public rights of way and cycle ways will be secured, where they are relevant to the proposal.

Policy 36 and Appendix 6 of the Local Plan set out minimum vehicle parking standards. The standards require at least two spaces for dwellings of up to three bedrooms, and three spaces for dwellings with four or more bedrooms.

As set out within the submitted site plan, 3 parking spaces are proposed for the proposed dwelling and 2 parking spaces are proposed to be retained for the host dwelling (No.72 Wignals Gate). The proposed dwelling features 4 bedrooms and the applicant's agent has clarified that the host dwelling features 5 bedrooms. Appendix 6 of the Local plan recommends 3 parking spaces per dwelling that features 4 or more bedrooms. Therefore, an additional parking space should be provided within the site and Lincolnshire County Council's Highways Team have set this out within their consultation response.

On-site parking is generally recommended to avoid the need for vehicles to be parked on roads. When vehicles are parked on roads this can cause highway safety problems by reducing visibility and causing a potential obstruction. Policy 36 of the Local Plan sets out that all new development should provide vehicle and cycle parking in accordance with the minimum parking standards set out within Appendix 6, unless a high quality-design can demonstrate that a lower standard of provision delivers the requirements set out in 1-4 below. It is not considered that the proposal represents a high quality design that justifies the lack of parking provision within the site. Therefore, the proposal is considered to be contrary to Policy 36 of the Local Plan.

Flood Risk

Section 14 of the NPPF sets out guidance relating to how local authorities should assess and determine applications which are subject to flood risk concerns.

Policy 2 of the Local Plan requires proposals to meet sustainable development considerations including in relation to sustainable drainage and flood risk (part 7).

Policy 4 of the Local Plan requires proposals in Flood Zones 2 and 3 to be supported by sufficient information relating to flood risks associated with the development.

The site lies within Flood Zone 3, as identified within the Environment Agency's Flood Maps. Policy 4 of the Local Plan sets out that development in Flood Zones 2 and 3 will be permitted in instances where specific criteria is met.

The proposed development is classed as a 'more vulnerable' use, according to Annex 3 of the NPPF. Therefore, the proposal needs to pass the sequential and exception tests in accordance with Section 14 of the NPPF.

The application is accompanied by a Flood Risk Assessment (FRA), within which section 3.3 sets out how the applicant considers that the proposed development passes the sequential and exception tests.

The NPPF requires the application of a sequential test to ensure that new development is in areas with the lowest probability of flooding. Paragraph 8.3.6 of the SFRA sets out that the search area for the sequential test should be the whole of the council area unless the functional requirements of the development justify a reduced search area. Notwithstanding this, National Planning Practice Guidance (NPPG) sets out that the sequential test should be applied proportionately, and the search area should always be appropriate to the nature and scale of the proposal (Paragraph 027a Reference ID:7-027a-20220825). The NPPG also sets out the following:

Paragraph 27: *"In applying paragraph 175 a proportionate approach should be taken. Where a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development (therefore addressing the risks identified e.g. by Environment Agency flood risk mapping), without increasing flood risk elsewhere, then the sequential test need not be applied."*

Paragraph 27a: *"For a non-major housing development, it would not usually be appropriate for the area of search to extend beyond the specific area of a town or city in which the proposal is located, or beyond an individual village and its immediate neighbouring settlements."*

Therefore, a settlement-wide search of Holbeach would typically be required; however, the submitted FRA does not contain a site search exercise despite there being some areas within Holbeach within lower risk flood zones. The FRA only sets out the following:

"The refined flood risk information contained within the SFRA demonstrates the site is not at risk during the present day 1% fluvial and 0.5% tidal event. The site therefore has a low probability of flooding and is considered to pass the Sequential Test."

Notwithstanding this, it is recognised that only a small area of Holbeach is within a lower risk flood zone. Furthermore, in this case the application site is not within a hazard area as identified within the South East Lincolnshire Strategic Flood Risk Assessment (SFRA). Areas that are not within hazard areas can be regarded as sequentially preferable given how much of the district is within higher risk hazard areas and Flood Zones 2 and 3. As such, in this case it is considered that the sequential test is passed.

In terms of the exceptions test, Paragraph 178 of the NPPF requires the following to be demonstrated:

"a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

In terms of part a, the development would make a contribution to local housing supply which could benefit the community as future occupants could help sustain local services and facilities. National Planning Guidance sets out that examples of wider sustainability benefits can include the re-use of

brownfield land and the provision of sustainable drainage systems (Paragraph: 036 Reference ID: 7-036-20220825). The submitted application form indicates that the proposed means of surface water drainage is via a soakaway. It is unclear if this is feasible at this stage due to the lack of submitted information. Therefore, it would be appropriate to include a condition requiring further drainage details to be provided. An alternative drainage strategy would only be permitted if it was demonstrated that a sustainable drainage strategy was infeasible. For example, if the ground conditions were not suitable for soakaway infiltration.

In terms of part b, the SFRA sets out at Paragraph 9.1.5, that there are a range of factors to be considered when determining whether or not a development is 'safe'. The SFRA provides an overview of how flood risk has been considered in shaping the proposals of the Local Plan; including the spatial strategy and the assessment of housing and employment sites. Within the SFRA, areas across South Holland have been identified according to the level of hazard that is posed in terms of flood risk. Appendix C of the SFRA sets out guidance in terms of the minimum measures that are required according to what hazard category areas fall under. The site is not within a hazard rating area and as such, the SFRA does not recommend any specific mitigation in this case. Notwithstanding this, the submitted FRA recommends that the finished floor level of the dwelling is 0.3m above the surrounding ground levels and 0.3m of flood resilient construction should be included. These measures could be secured via a planning condition.

Therefore, it is considered that the proposed development accords with Policy 4 of the Local Plan and the intentions of the NPPF in terms of flood risk.

Biodiversity Net Gain

Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) requires developers to deliver a minimum of 10% Biodiversity Net Gain using standardized biodiversity units measured by statutory biodiversity metrics. This is often referred to as the mandatory requirements for Biodiversity Net Gain.

"Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits".

The biodiversity gain condition is a pre-commencement condition. This relates to a condition that seeks, once planning permission has been granted, a Biodiversity Gain Plan that must be submitted and approved by the planning authority before commencement of the development, alongside the need to submit a Habitat Management and Monitoring Plan.

The effect of Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission is deemed to have been granted subject to the "biodiversity gain condition".

The effect of this "biodiversity gain condition" is that development granted by this notice must not begin unless:
(a) a Biodiversity Gain Plan has been submitted to the planning authority, and
(b) the planning authority has approved the plan, or
(c) the development is exempt from the biodiversity gain condition.

The council's ecology officer considers that the proposal would be exempt from the requirement to provide BNG as the proposal falls under the de minimis exemption.

The council's ecology officer has also recommended that one integrated nest brick and one integrated bat box should be provided within the development to provide habitat in accordance with Policy 28 of the Local Plan. These measures could also be secured via a planning condition.

Contamination

Policy 30 of the Local Plan sets out the development proposals will not be permitted where, taking account of any proposed mitigation measures, they would lead to unacceptable adverse impacts upon land quality and condition.

The council's environmental protection team have been consulted on the application to determine if any conditions are required in relation to investigate any potential contamination risks from the proposals. The environmental protection team have recommended a standard land contamination condition.

Planning Balance

As detailed above, Section 38 (6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that the Local Planning Authority makes decisions in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

It is considered that the proposed siting, scale and bulk of the dwelling would result in an overdevelopment of the site that would appear incongruous within the street scene, resulting in a negative impact on the character and appearance of the area. It is also considered that the proposal would result in an unacceptable degree of overshadowing, overbearing and overlooking with neighbouring properties. As such, in visual and amenity terms, the proposal is considered to be contrary to Policies 2 and 3 of the Local Plan and Paragraph 135 of the NPPF. Furthermore, insufficient onsite parking is proposed and as such, the proposal would also be contrary to Policy 36 of the Local Plan.

There are significant material considerations that weigh against the proposal and as such, the planning balance is against the development.

Additional Considerations

Public Sector Equality Duty

In making this decision the Authority must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:

A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).

C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149. It is only one factor that needs to be considered, and may be balanced against other relevant factors.

It is not considered that the recommendation in this case will have a disproportionately adverse impact on a protected characteristic.

Human Rights

In making a decision, the Authority should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as South Holland District Council to act in a manner that is incompatible with the European Convention on Human Rights. The Authority is referred specifically to Article 8 (right to respect for private and family life) and Article 1 of the First Protocol (protection of property).

It is not considered that the recommendation in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is

also permitted to control the use of property in accordance with the general public interest and the recommendation is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

Conclusion

The proposal is considered to conflict with Policies 2, 3 and 36 of the Local Plan and the provisions of the NPPF when viewed as a whole. These are significant factors in this case that indicate against the proposal and outweigh the consideration in favour of the proposal and the policies referred to above.

Recommendation

Based on the assessment detailed above, it is recommended that the proposal should be refused under delegated authority.