DECISION DELEGATED TO HEAD OF PLANNING

Application No:	**H22-0020-26**	**Applicant:**	**Mr C Plumb**
Proposal:	Residential development for one detached house		
Location:	Adj 27 Delgate Avenue Weston Spalding		
Terminal Date:	7th April 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 and 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	1	0
OTHER STATUTORY BODIES	0	0	0	2
RESIDENTS	1	0	0	0

CASE OFFICER ASSESSMENT

Proposal

The proposal seeks outline planning permission with all matters reserved for the erection of a dwelling. Although all matters are reserved, the indicative site layout shows that the vehicular access would likely need to be taken from the south-western edge of the site.

Site Description

The application site comprises garden land that is located between 26 and 27 Delgate Avenue, Weston.

The site is within the settlement boundary of Weston, 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

No planning applications have previously been submitted within the site.

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.

Lincolnshire County Council - Highways and SUDS: It is noted that this is outline with all matters reserved but due to the nature of the location we have to be content that access can be provided to the site. The indicative plan demonstrates that parking can be provided within the site. There is a telegraph pole where the access is to be proposed it will be for the applicant to bare the costs of relocating it. The access will need to be constructed to Lincolnshire County Council Specification. Whilst this site is very cramped and may produce amenity issues. The proposal will not have an adverse impact on highway safety or capacity. We therefore have no concerns. Highway Informatives 03 and 08 are recommended.

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: No comments or objections.

South Holland Internal Drainage Board:

Byelaw 3 (Surface Water): The applicant has indicated on the Application Form 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 has not indicated how they propose to dispose of foul water from the development. If the applicant proposes to discharge treated foul water to a watercourse, consent would be required under Byelaw 3. Please note that any consent granted for the discharge of treated foul water is likely to be subject to a Treated Foul Water Development Contribution fee (TFWDC) as outlined within our Development Control Charges and Fees.

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.

Ecology Officer: There has been sufficient evidence provided to determine this application, however, to achieve the appropriate level of accuracy and rigour, some alterations to the BNG proposals are required, which could mean that off-site units may be needed to achieve 10% net gain.

While we recognise the effort the applicant has made in preparing the BNG proposal, we require several amendments to the metric prior to commencement.
-Firstly, the baseline hardstanding should be classified as Developed Land (sealed surface). This will not alter the baseline unit value but will provide greater transparency regarding the habitat type currently present on site.
-We also recommend that the statutory metric be used. It appears that the baseline grassland habitat condition could justifiably be classified as being in poor condition, whereas the Small Sites Metric defaults to moderate condition. Therefore, using the statutory metric could appropriately reduce the baseline habitat value upon which the 10% gain calculation is based.
-The existing tree on site must also be included within the submitted metric calculations.
-Post-development, the vegetated habitat on site should be categorised as Vegetated Garden, as it will fall within the domestic curtilage of the proposed dwelling.

These amendments may result in the scheme failing to achieve the required 10% Biodiversity Net Gain on site. Should this be the case, off-site units will need to be secured prior to commencement. If offsite units are required, they will need to be secured pre-commencement and can be achieved via 2 routes.

2 integrated nest bricks and one integrated bat box should be provided to accord with Policy 28 of the Local Plan.

Weston Parish Council: No response received.

Cllr T E Sneath: No response received.

Cllr A Casson: No response received.

Cllr A R Woolf: 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, one representation has been received. The following matters are raised within the response:

- The very close proximity of the proposed development to a neighbouring garden would overshadow the garden during
afternoon hours.
- Parking is very restricted along Delgate Avenue with many residents parking on the verge and on corners.
- The water board are called out on a regular basis, due to the fowl manholes blocking, normally stemming from the one in the garage area behind the proposed build.
- A new build on this specific spot would be totally out of character with the surrounding premises.

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; and
-Biodiversity Net Gain.

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 Weston which is a Minor 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. Development will normally be limited to allocated and committed sites and infill. Therefore, the principle of development is considered to be acceptable as one dwelling is an appropriate form of infill development. However, it is also necessary to assess the

proposals against other relevant criteria and 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.

At this stage, the proposed scale, appearance, layout and landscaping details of the proposal are unknown. As such, it is difficult to assess the visual impact of the proposals. Notwithstanding this, the application is accompanied by an indicative site layout plan which shows how a dwelling could be positioned within the site.

The indicative layout shows how the dwelling could be set back from the road frontage by approximately 9m, which would be similar to the nearest dwelling to the north of the site (26 Delgate Avenue).

The street scene along Delgate Avenue is characterised by semi-detached dwellings which feature similar appearances. For example, the dwellings each feature gable end roof forms and similar external materials. The dwellings are also set within relatively spacious plots with rear gardens and front driveway areas/front gardens.

It is considered that the proposed dwelling would stand out within the street scene as the only detached dwelling in amongst semi-detached dwellings. Whilst the dwelling could be set back form the road frontage at a similar distance as 26 Delgate Avenue, the dwelling would be set further forward than 27 and 28 Delgate Avenue.

The proposal would require the sub-division of the garden of 27 Delgate Avenue, resulting in a cramped layout that differs significantly from the existing dwellings within the street scene. The garden for the proposed dwelling would be irregularly shaped and much smaller than most of the nearest dwellings. For example, based on the indicative layout, the garden would only be approximately 2m in depth in some places.

Therefore, whilst the site layout remains unconfirmed at this stage, it is considered that the site does not have the capacity to accommodate a suitably designed dwelling; with a resultant dwelling in this site causing an unacceptable imapct upon the character and appearance of the area.

As such, the proposal is considered to be contrary to Policies 2 and 3 of the South East Lincolnshire 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.

Based on the indicative layout, it is considered that there could be suitable separation distances between any habitable room windows within the dwelling and windows within any of the nearest dwellings. For example, there would be approximately 13m between the north-eastern elevation of the dwelling and the south-western elevation of 26 Delgate Avenue. There is one first-floor window

on the side elevation of 26 Delgate Avenue and it is unclear what room this connects to. As such, the placement of any windows at the first-floor level of the dwelling within the site would need to be carefully considered to avoid an unacceptable degree of overlooking.

The subdivision of 27 Delgate Avenue would result in the provision of approximately 100sqm of garden space for No.27. The rear garden for the proposed dwelling would be approximately 40sqm with some smaller areas at the side and front of the dwelling. The rear garden space would be adjacent to the side elevation of 27 Delgate Avenue, meaning that the space would be overlooked, and this would result in a lack of privacy for future occupants. Furthermore, the rear elevation of the dwelling within the site would likely overlook the garden of 27 Delgate Avenue to an unacceptable degree due to the small size of the plot and the proximity of the boundary with No.27.

Therefore, the proposal would result in a lack of suitable outdoor amenity space and would likely result in a harmful loss of privacy for both the occupants of 27 Delgate Avenue and any future occupants of the dwelling within the site. 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.

Although consent is not sought for the proposed access at this stage, the indicative site plan shows that it is likely that vehicular access would need to be taken from Delgate Avenue, to the south-west of the site. Lincolnshire County Council's Highways Team have confirmed they have no objections to the proposals, nor have they recommended any planning conditions. The team have set out that there is a telegraph pole where the access is to be proposed and as such, this would need to be moved to make way for the access.

Therefore, the proposal is likely to have an acceptable impact on highway safety in accordance with Local Plan Policies 2, 3 and 36, and Section 9 of the NPPF. Notwithstanding this, any reserved matters application would need to be accompanied by a suitably detailed access plan showing relevant visibility splays.

Flood Risk

Section 14 of the National Planning Policy Framework (December 2024) explains that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere".

This goes on to state, within Paragraph 172, that all plans "should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below".

Paragraph 173 of the National Planning Policy Framework (December 2024) goes on to state that "A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding", by following the steps set out within Section 14 of the National Planning Policy Framework (December 2024).

Paragraph 174 goes on to state that, "Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding", with the strategic flood risk assessment being the tool to demonstrate this.

Paragraph 175 details that "The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)".

If, following the application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in Zones with a lower probability of flooding, the Exceptions Test can be applied if appropriate.

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 of the Environment Agency's Flood Maps. These have been created as a tool to raise awareness of flood risk with the public and partner organisations, such as Local Authorities, Emergency Services and Drainage Authorities. The Maps do not take into account any flood defences.

The South East Lincolnshire Strategic Flood Risk Assessment (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. Policy 4 of the South East Lincolnshire Local Plan (2019) is clear in that "Development proposed within an area at risk of flooding (Flood Zones 2 and 3 of the Environment Agency's flood map or at risk during a breach or overtopping scenario as shown on the flood hazard and depths maps in the Strategic Flood Risk Assessment) 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 submitted FRA details that "Large parts of the South Holland district between the River Welland and River Nene lie within Flood Zone 3. As such, opportunities to undertake the development at an alternative site with a lower flood risk are limited.

At this location it is not possible to position the development on higher ground within the proposed site. The SFRA states that as it is necessary to use the refined flood risk information (hazard and depth maps) to assist with the application of the sequential test".

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."* Paragraph 27a further details that *"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."

A settlement-wide search of Weston is therefore required; however, the submitted FRA does not contain a site search exercise despite there being areas within Weston 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."

As such, it is considered that insufficient information has been provided to demonstrate that the sequential test is passed. As the development has not passed the sequential test, it is not necessary to apply the exception test.

The South East Lincolnshire Strategic Flood Risk Assessment (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 area and as such, no specific flood risk mitigation is recommended within the SFRA for the proposal in this instance.

In terms of the surface water strategy for the development, the application form indicates that the proposal would seek to use soakaways as a means of managing surface water runoff from the site. Soakaways are a sustainable means of drainage management and as such, this is supported in principle; however, further details would need to be secured via a planning condition to ensure that soakaways are feasible within the site.

It is considered that the development has not passed the sequential test in flood risk terms and as such, the proposal is contrary to Policy 4 of the Local Plan and Paragraphs 173 and 174 of the NPPF.

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 application is accompanied by a Biodiversity Net Gain Assessment which appears to indicate that a net gain in biodiversity of 10% could be delivered within the site based on the indicative layout. The LPA's ecology officer has set out that this information might require updates as there

appears to be some inaccuracies within the calculations. As such, it might be necessary to secure habitat units off-site to deliver a net gain in biodiversity. This could be secured via a planning condition.

The ecology officer has also recommended that two integrated nest bricks 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.

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.

Although all matters are reserved, it is considered that the proposed siting of a detached dwelling within the site, in a street scene characterised by semi-detached dwellings, would be out of keeping with the character and appearance of the area. It is also considered that the proposal represents an overdevelopment of the site as any dwelling is likely to appear cramped. Furthermore, it is considered that insufficient garden space would be provided and there would be an unacceptable degree of overlooking between the plot and 27 Delgate Avenue. 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.

It is also considered that insufficient information has been provided to demonstrate that the sequential test has been passed. As such, the proposal is also contrary to Policy 4 of the Local Plan and Section 14 of the NPPF.

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 4 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.