Application Ref: NP/18/0396/OUT

Case Officer: Nicola Gandy
Applicant: Mr Marshall & Mr Warren-Davis
Agent: Acanthus Holden Ltd
Proposal: Residential development - 14 dwellings
Site Location: Land off Trewarren Road, St Ishmaels, Haverfordwest, Pembrokeshire, SA62 3SZ
Grid Ref: SM83490718
Date Valid: 09-Jul-2018 Target Date: 02-Sep-2018

Consultee Response

St Ishmaels Community Council: Objecting - 04/09/18 - Further email to reinforce the Community Council's objection to this application.
PCC - Education Dept: No contribution to education provision required.
Dyfed Powys Police: See comments on letter dated 18 July 2018
PCNPA Planning Ecologist: Reply
PCNPA Park Direction: Reply
PCC - Waste & Recycling Manager: Comments regarding reversing and the new road must be designed to withstand a laden weight of not less than 26 tonnes
Dyfed Archaeological Trust: No objection
Dwr Cymru Welsh Water: Conditional Consent
Natural Resources Wales: Conditional Consent
PCC - Transportation & Environment: Conditional Consent
PCC - Head of Public Protection: No adverse comments

Public Response

The application was advertised in the press, on site and by neighbour notification.

3 letters of objection have been received, a copy of the full objections are available to view on the application file, however the objections are summarised as follows:

- Viability
- Loss of hedgebank
- Ecological Impact
- Impact of the development during construction phase
- Visual Impact
- Highway safety at the school and off street parking concern

The majority of the objections raised are addressed in the main body of the report however the following comments are offered in respect of points not covered:-

- The construction phase of any development will cause some disturbance in respect of noise and highways, however, this is in the short term and is not considered to be a reasonable reason to refuse planning permission.

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Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website - http://www.pembrokeshirecoast.org.uk/default.asp?PID=549

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 06 - Rural Centres
LDP Policy 08 - Special Qualities
LDP Policy 11 - Protection of Biodiversity
LDP Policy 12 - Welsh Language
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 32 - Surface Water Drainage
LDP Policy 44 - Housing
LDP Policy 45 – Affordable housing
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 09 - Housing
SPG08 - Affordable Housing

Constraints

Special Area of Conservation - within 500m
LDP Allocation
LDP Mineral Safeguard
LDP Open Space
Biodiversity Issue
Historic Landscape
Potential for surface water flooding
LDP Centre:50pc aff housing;30 units/ha
Recreation Character Areas
Landscape Character Assessment
Seascape Character Assessment

Officer's Appraisal

Site and Development Description

The application seeks outline permission for 4 affordable houses and 10 open market houses with all matters, other than access and layout, reserved for future consideration.

The layout plan indicates that the site is proposed to be accessed from the north west of the site with a new tarmac surfaced road and adjoining protected natural areas either side. The road is proposed to be 5.5m double width.
The proposed dwellings will comprise a mixture of 4, 3 and 2 bedroom two storey and single storey dwellings. The scale parameters provided for the houses are as follows:

Height - 6m – 8.2m
Length 10-14m (To allow for ‘L’ shaped dwellings)
Width 10-14m (To allow for ‘L’ shaped dwellings)

The application has been supported with the following information:

- Design & Access Statement
- Topographical Survey
- Historic Environment Appraisal
- Otter Survey (dated 16th October 2018)
- Viability Information

Relevant Planning History

NP/15/0031/OUT – Outline application for 27 dwellings – Refused and dismissed at appeal - 4th January 2017

The application was refused by the Authority as the applicant would not enter into a legal agreement to allow the Authority to reassess the viability of the scheme at reserved matters stage. The Inspector considered the application as a whole and in particular the issue of reassessing the viability of the development. The Inspector agreed with the Authority’s approach and dismissed the appeal.

The Inspector’s report also considered other matters, including layout and access. The Inspector considered the proposed layout and access arrangements to be acceptable and in accordance with the policies of the Local Development Plan.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Amenity and Privacy
- Access and Parking
- Archaeology
- Water, Drainage and Flooding
- Biodiversity

Policy:
The application site is located to the south of St Ishmaels which is identified as a ‘Rural Centre’ within the Local Development Plan (Policy 6 refers). The site forms part of a housing allocation, identified in the as reference MA733.

The supporting policy (policy 44) identifies the proposed distribution of dwellings during the Local Development Plan Period. Rural Centres and countryside dwellings are proposed to be distributed at approximately 331 dwellings as well as a windfall contribution of 250 dwellings. The policy identifies that the Authority will require a minimum density of 30 dwellings per hectare on housing development in the Centres where this is compatible with the character of the Centres.

The site is within part of an area allocated in the LDP for mixed use development, including residential development. The allocation was originally designated for mixed use development as the Education Authority at PCC advised at the time the Plan was being prepared that they may require land for expansion of the school at St Ishmaels. Further assessment has shown this to no longer be the case and so the land can be used exclusively for residential development.

The LDP allocation refers to the provision of 40 dwellings in total although this relates to a site area larger than the application site, with a parcel of land in separate ownership to the east of the application site and Coastlands School. Outline permission was sought and granted for the development of 13 houses, including 3 affordable houses on the land to the east of the school in September 2016 (NP/16/0219/OUT refers). During the appeal process for the previous application on this site Dwr Cymru/Welsh Water advised that there was sufficient capacity in the sewage system for up to 27 houses only and not the 40 that had been allocated through the LDP. 13 of the total capacity of 27 has been taken up by the dwellings approved at the adjacent site (NP/16/0219/OUT refers), consequently the applicant has only applied for 14 dwellings.

The number of houses proposed in the current application is wholly based on the available capacity of the sewage system with 14 houses (including 4 the affordable houses) proposed. The density of development within this part of the site is therefore much lower than the minimum density of 30 houses per hectare sets out in Policy 44 of the Local Development Plan, however the agent has indicated that this is due to the sewage system capacity for the area. Whilst the previous application (NP/15/0031/OUT refers) suggested that development of the site, even without any affordable housing provision or contribution was unviable, the applicant’s agent has suggested that development of the site for a lesser number of units and some alterations to the design and layout will provide some residual value and therefore 4 affordable dwellings are included in the application. A draft legal agreement has been submitted with the application to ensure the provision of these affordable dwellings.

The previous scheme for 27 dwellings was agreed to be unviable by the applicant, however, the current application for 14 dwellings is now accepted by the applicant to be a viable option. The application is accompanied by Revised Viability Information Report, which states that the current proposal is of a more economic scheme with less hard surfacing, better integration with site levels and items such as garden
rooms with solar roofs omitted. A Chartered Quantity Surveyor has carried out a feasibility study for the development showing the scheme would be viable.

It can be accepted that the principle of 14 dwellings on this parcel of land is in accordance with the scope of allocation provided in the LDP and as such the principle of development is acceptable.

**Affordable Housing provision**

The adopted Supplementary Planning guidance requires an affordable housing on site provision of 30% for this allocation. The application proposed 4 of the 14 houses to be affordable houses, as such, the proposed development complies with the requirements of the SPG.

The application is accompanied with a draft S106 Agreement for the provision of the 4 affordable houses, discussions are on-going with the applicant in respect of the affordable housing type and mixture. The application is in outline with matters of design and scale reserved for future consideration, if at the point of a reserved matters application the housing need varies, in terms of house type/bedroom numbers, from the indicative plan provided the matter can be dealt with at this point. The section 106 agreement will allow for the housing type and mixture to be determined at reserved matters stage.

**Siting, Design and Impact upon the Special Qualities of the National Park**

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria ‘a’ and ‘b’ resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria ‘d’ and ‘e’ resists development that would fail to harmonise with, or enhance the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion ‘a’). Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion ‘b’) or is visually intrusive (criterion ‘d’).

The application reserves matters of appearance, landscaping and scale of the development for future consideration although seeks approval for the access and layout of the development. As such it is important to consider the impact of the access as well as site layout upon the character and appearance of the surrounding area and special qualities of the National Park.

In terms of existing character it can be noted that the village of St Ishmaels comprises a mixed range of housing blocks and types. There is no set theme throughout the village although the ‘Brook Inn’ provides a useful punctuation point for visitors to the area and is of a generally traditional two storey form.
The proposed highway access will involve the removal of part of the hedgerow which adjoins the highway in order to create the access and visibility splays. The areas of land adjoining the access road are to be retained as a protected natural area within the site. These areas comprise existing trees, as well as retention of the stream, pond, otter underpass and provision of small culvert/bridge over the existing stream.

The removal of hedgerow is regrettable in visual terms; however, this will result in the benefit of the adjoining natural areas being visible from both outside and within the development site thus creating a semi-rural access into the housing site. It is not considered that this alteration would be harmful to the character of surrounding environment and as such, subject to suitable conditions, would comply with the aims and requirements of policies 8, 15, 29 and 30 within the LDP.

In respect of layout, it can be noted that the application layout seeks to follow the contours of the site. The dwellings, when viewed from the land at its lowest incline near the centre of the village, would be viewed against the backdrop of Coastlands School. Although the Authority is not in receipt of details of the full design of the dwellings at this stage the built form is proposed to vary across the site with a mix of single storey and two storey dwellings.

The layout proposed will not harm the character or appearance of the surrounding area or the special qualities of the National Park and subject to further detailing of the form and nature of the dwellings at reserved matters stage complies with the requirements of policies 8, 15, 29 and 30 of the LDP.

Amenity and Privacy:

The application site is positioned to the south of Nos 5 and 7 Trewarren Road, to the east of properties along Grove Road. The land lies adjoining the grounds of Coastlands School to the east and land which has outline permission for 13 dwellings.

Whilst matters of design are reserved for future consideration the proposed layout of the scheme will cause no adverse impact upon the amenities of neighbouring occupiers in the area given the distances between the proposed dwellings, those approved NP/16/0219/OUT and existing dwellings.

A natural area which accommodates the stream will be retained between the dwellings along Trewarren Road and the new housing development. A wooded area would be retained along the west boundary of the site causing a buffer between the existing and proposed dwellings.

As a result the development proposed complies with the requirements of policies 29 and 30 of the LDP.

Highway Safety, Access and Parking:

Policies 52 and 53 of the Local Development Plan refer to sustainable transport and the traffic impacts of proposed development. The Highway Authority has been consulted and advises that the principle of an access onto Trewarren Road is...
acceptable subject to a number of works, including some opening up of the visibility splay at the access point and ground improvements to the line of the estate road.

With regard to internal road layout the Highway Authority comments that this appears satisfactory, including a good level of design speed reduction through an informal layout and that adequate parking is indicated. They advise that further consideration will need to be given to swept path of larger vehicles, such as refuge vehicles. Conditions have been suggested including the provision of the further details of the junction, full details of the estate road, provision and completion of the parking areas and details of the access arrangements as part of the construction phase. Such conditions are reasonable in the interests of the development with particular regard to highway safety.

The Highway Authority has requested a contribution towards safe access for cyclist and pedestrians to the school from the site and the provision of cycle facilities at the school. The applicant has agreed to this and the contribution will be secured via a legal agreement.

**Water, Drainage and Flooding**

The scheme proposes connection to the existing drainage system and that foul sewerage be disposed of through the mains sewer. With regard to flood risk the application form submitted identifies that surface water will be disposed of through soakaways.

The application has been assessed by Dwr Cymru/Welsh Water and the Drainage officers at Pembrokeshire County Council who have no objection to the scheme subject to appropriate conditions.

Natural Resources Wales has offered no objection to the application on water drainage or flooding grounds although requested the addition of a condition in respect of pollution prevention.

As a result it is considered that the development proposed can be adequately accommodated within the site and this complies with the aims and requirements of policies 32 and 34.

**Biodiversity:**

Policy 11 of the LDP refers to the protection of biodiversity, and requires that development that would impact on habitats and species will only be permitted subject to suitable mitigation. The application was accompanied by an Ecological Appraisal and further ecological reports have been submitted during the processing of the application. The scheme has been assessed by both Natural Resources Wales and the Authority’s Ecologist who have no adverse comments to make in relation to the application subject to conditions.

The application site has remained unchanged since the 2014 planning application and has been invaded by scrub: willow, gorse and bramble and the wet marshy areas have become rank and subject to incursion by gorse and willow. In the survey
submitted limited evidence of protected species was recorded, the site was assessed as being unsuitable for foraging and commuting bats and no features for roosting bats were recorded onsite. No badger setts were recorded, however there was activity recorded on site and there is the potential for setts to be present. The survey recorded no evidence of Otters and considered that there may be visit areas outside of the site. The Local Records Centre has multiple records of Otters, upstream of the site, as such a full otter survey was requested.

An Otter survey was submitted on 17th October 2018 where no evidence of Otter presence found within or in the vicinity of the site and it was concluded that there is no regular or habitual use of the site by otters. However, the report considered that the stream to the north west of the site offers a possible Otter travel line, although no signs of recent use were found.

With regard to the proposals the survey indicates a suggested wildlife area which includes the areas identified on the application layout drawings as being the ‘protected natural area within the site’ as well as land which lies immediately outside the application site on the western boundary. The report identifies that the Wildlife Conservation Area is proposed by the applicant to compensate for any adverse effects on the ecological interests of the site caused by the development, this will be secured via a S106 legal agreement. The submission indicates that although no signs of otter were observed along the streams during the surveys undertaken in 2010, 2014 and 2018, this species is known to frequent coastal and riparian habitats in the area and the stream. In order to minimise any concerns regarding otters conditions are proposed to prevent encroachment of the development into the designated wildlife areas and the provision of a dry underpass to permit offers safe passage between the two parts of the wildlife area together with appropriate fencing.

At the September 2015 Committee Meeting members raised a question as to whether otters would likely return to the development site following development. In response to this question the Authority’s Planning Ecologist states “The provision of underpasses for otters is fairly standard when dealing with new road schemes or large developments. They are well used and otters are often recording commuting through them once construction is complete. For this scheme the interruption to otters would be minimal, especially as we are not talking significant numbers and no natal dens were recorded nearby. The proposed conditions also provide us plenty of scope to develop and design adequate mitigation so in my opinion it is unlikely to cause significant harm and more than likely that the site will continue to be used by otters once completed.”

On the basis of the information provided as part of the application and the retention of wildlife areas in addition to further conditions to control the nature of the development it can be concluded that the scheme would not disturb or harm protected species or their habitats in accordance with the requirements of Policy 11.

**Conclusion**

Following consideration of the policies contained within the Local Development Plan and National Planning Policy in the form of Planning Policy Wales (Edition 9, November 2016) and having regard to all material considerations it is considered

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that the proposal will be in keeping with the aims of the LDP in that the development is considered to provide new residential properties, whilst sustaining the local character of the National Park and not adversely impacting on ecology of highway safety. As such, and subject to S106 Agreements and a schedule of suitable conditions, the development is considered to be acceptable and complies with the requirements of policies 11, 44, 45, 52 and 53 of the adopted Local Development Plan.

Recommendation

That the application be delegated to the Chief Executive/Director of Planning / Team Leader to grant planning permission subject to the conditions as outlined within the report and completion of S106 Agreements in respect of the heads of terms as set out below. The Section 106 legal agreements will be required within three months of the date of the meeting, and if not completed within this timeframe, officers will be able to use their discretion to refuse the application under delegation procedures as the proposal would be contrary to policies 11, 44, 45, 52 & 53.

S106 Requirements:- Heads of Terms

1. 4 Affordable units to be provided on site, including the timing of their completion
2. Planning obligations ( Provision of cycle facilities)
3. Wildlife Conservation Area Management Scheme

Conditions/Reasons

1. Any application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission. 
   **Reason:** Required to be imposed pursuant to Section 92 (2) of the Town and Country Planning Act 1990.

2. The development shall begin either before the expiration of five years from the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.
   **Reason:** Required to be imposed pursuant to Section 92 (2) of the Town and Country Planning Act 1990.

3. Details of the appearance, landscaping and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
   **Reason:** The application, in outline form, does not give sufficient detail for consideration of these matters at this time.

4. The reserved matters submission shall be in accordance with the parameters of scale for the development and broadly in accordance with other considerations as set out on the submitted Design and Access Statement (Received 9th July 2018).
   **Reason:** In order to be clear on the scale of development approved in
principle in the interests of visual amenity and the special qualities of the National Park. Policy: Local Development Plan - Policies 8 (Special Qualities), 15 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

5. No flood lighting, security lighting or any other external means of illumination of the site shall be provided, installed or operated in the development, except in accordance with a detailed scheme, which shall provide for lighting that is low level, hooded and directional, and has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details and retained as such thereafter. Reason: In the interests of biodiversity. Policy: Local Development Plan - Policies 8 (Special Qualities), 9 (Light Pollution) & 11 (Biodiversity).

6. No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:
   a) Risk assessment of potentially damaging construction activities (specifically the proximity of the Pembrokeshire Marine SAC, potential presence of badger setts and reptiles)
   b) Identification of biodiversity protection zones
   c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
   d) The location and timing of sensitive works to avoid harm to biodiversity features.
   e) The times during construction when specialist ecologists need to be present on site to oversee works.
   f) Responsible persons and lines of communication.
   g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
   h) Use of protective fences, exclusion barriers and warning signs.

   The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details. Reason: In the interests of biodiversity. Policy: Local Development Plan - Policies 8 (Special Qualities) & 11 (Biodiversity).

7. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the occupation of the development. The content of the LEMP shall include the following.
   a) Description and evaluation of features to be managed.
   b) Aims and objectives of management.
   c) Appropriate management options for achieving aims and objectives.
   d) Works necessary to establish the Wildlife and Conservation Area and Compensatory Wetland (as set out in the Ecological Re-assessment, 31st July 2017, Pryce Consultant Ecologists, sections 4.2 and 4.3)
   e) Prescriptions for management actions.
   f) Preparation of a work schedule (including an annual work plan capable of
being rolled forward over a five-year period).
g) Details of the body or organization responsible for implementation of the plan.
h) Ongoing monitoring and remedial measures.
The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

**Reason:** In the interests of biodiversity. Policy: Local Development Plan - Policies 8 (Special Qualities) & 11 (Biodiversity)

8. Prior to the commencement of works an otter walkover survey will be completed and submitted to the local planning authority.

**Reason:** In the interests of biodiversity. Policy: Local Development Plan - Policies 8 (Special Qualities) & 11 (Biodiversity).

9. No development shall commence until a Method Statement detailing all necessary pollution prevention measures for the construction phase of the development is submitted to and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved Statement.

**Reason:** In the interests of amenity and biodiversity. Policy: Local Development Plan - Policies 8 (Special Qualities), 11 (Biodiversity) and 30 (Amenity).

10. No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

**Reason:** To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan -29 (Sustainable Design).

11. No development shall commence until details of the junction between the proposed access road and the highway have been submitted to and approved in writing by the local planning authority. The dwellings shall not be occupied nor the use commenced until the junction has been constructed and is available for use in accordance with the approved details. There shall be no obstructions to visibility exceeding 0.6m in height within the splayed areas.
12. The proposed development shall be served by estate roads laid out and constructed, including means of surface water disposal, in accordance with the current Pembrokeshire County Council Highways Requirements for Development and guidance contained within Manual for Street, details of which are to be submitted to and approved in writing by the Local Planning Authority and prior to first occupation the road will be brought up to base course level and prior to final occupation the road shall be surfaced to wearing course level.

**Reason:** To ensure an adequate multi modal access and ensure that the impacts of the development are suitably mitigated in the interests of highway safety. Policy: Local Development Plan Policies 52 & 53.

13. No part of the completed development shall be used or occupied until the associated car parking areas and turning areas have been completed and marked out up to the property in accordance with the approved plan. The car parking area, access and turning areas shall thereafter be retained in accordance with the approved plans and available for use as car parking and turning.

**Reason:** To ensure adequate car parking and turning within the curtilage of the site, in the interests of highway safety. Policy: Local Development Plan Policies 52 & 53.

14. Prior to the commencement of development, details of how the site is to be accessed during construction, how site accommodation is to be provided, including storage and details of the development shall be submitted to and approved in writing by the local Planning authority. The scheme shall be carried out in accordance with the approved details.

**Reason:** In the interests of highway safety. Policy: Local Development Plan Policies 52 & 53.

15. No development, demolition or site clearance shall take place until there has been submitted to and approved in writing by the local planning authority a scheme relating to the immediate landscape. The scheme shall be implemented as approved.

**Reason:** In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 11 (Protection of Biodiversity), 15 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity).

16. Notwithstanding the provisions of Article 3 of The Town and Country Planning (General Permitted Development) Order 1995, (or any Order revoking or re-enacting that Order) any electricity or telephone supplies to the site shall be by underground cables.
**Reason:** To preserve the character of the area. Policy: Local Development Plan - Policies 1 (National Park Purposes and Duty) and 15 (Conservation of the Pembrokeshire Coast National Park).

**Informatives**

This permission is subject to a legal Agreement
The applicants attention is drawn to the comments from the drainage officer attached.
A. R. G. H. POST AND WIRE STOCK-PROOF FENCING WITH SHEEP NETTING SET BACK 2m FROM ROAD EDGE.

THORN TO BE PLANTED ON WILDLIFE AREA SIDE OF FENCE. THORN TO CONSIST OF A MIX OF HAWTHORN CRATAEGUS MONOGYNA AND BLACKTHORN PRUNUS SPINOSUS, A MISTURE OF WHIPS AND FEATHERS AT 300mm CENTRES.

ACCESS (FARM) GATES TO BE PROVIDED BOTH SIDES OF ROAD FOR MANAGEMENT OF EACH WILDLIFE AREA.

THE CONSTRUCTION OF THE ROAD, ITS MATERIALS, PLANT AND ANY OTHER ASSOCIATED PARAPHERNALIA SHALL NOT BE PERMITTED TO ENCROACH ON WILDLIFE HABITATS EITHER SIDE.

B. C. E. F. G. REAR HOUSE GARDEN FENCES TO CONSIST OF 1500 TO 1800mm. TIMBER CLOSE BOARDED FENCES. EACH REAR GARDEN IS TO HAVE AT LEAST 1 HEDGEHOG PASSAGE. THIS IS TO CONSIST OF A HALF A HOLLOW CONCRETE BLOCK LAND BELOW OR AT THE BASE OF THE FENCE. PREFERABLY THESE SHOULD BE LOCATED IN CORNERS.