
MAIN CASE

Reference No: 18/00579/ESF

Proposal: Extension of existing cold storage facility, small extension to administration office & vehicle parking

Site Address: Turners (Soham) Ltd Fordham Road Newmarket Suffolk CB8 7NR

Applicant: Turners (Soham) Ltd

Case Officer: Andrew Phillips, Planning Team Leader

Parish: Fordham

Ward: Fordham Villages

Ward Councillor/s: Councillor Joshua Schumann
Councillor Julia Huffer

Date Received: 22 May 2018

Expiry Date: 1 February 2019

[T168]

1.0 **RECOMMENDATION**

1.1 Members are recommended to approve the application subject to the signing of the S106 Agreement and the following draft conditions with authority delegated to the Planning Manager and Legal Services Manager to complete the S106 and to issue the planning permission. The recommended planning conditions can be read in full within Appendix 1.

Recommended conditions:

1. Approved Plans
2. Time Limit
3. Frozen goods only
4. Renewable energy
5. Contamination
6. Unexpected contamination
7. Surface water drainage
8. Soft landscape (10 year maintenance)
9. Hard landscape
10. Construction Environmental Management Plan
11. Biodiversity improvements
12. Archaeological investigation
13. Bunds
14. Chilled to frozen

- 15. Foundations
- 16. Materials
- 17. Removal of permitted development rights (hard landscaping)

The S106 will secure:

- Bus/pedestrian improvements (circa £15,000)

2.0 SUMMARY OF APPLICATION

- 2.1 This application is supported by an Environmental Statement (submitted 24 July 2018) in order to cover the significant issues of potential impact on the highway network and the character of the area. In regards to the character of the area the main concern is the views from the north looking towards the site. The key issue in regards to transport is whether a change to frozen goods will increase or decrease the amount of lorries entering/leaving the site. The Environmental Statement should be carefully considered by Committee Members prior to making a determination on this proposal.
- 2.2 The proposal seeks to erect a 8, 982 square metre (96,681 square feet) frozen goods warehouse, a replacement lorry park (for the storage of lorries), SuDS and a new bund along the northern boundary. The proposal will lead to 18 additional full time jobs. The proposal is 22m (72ft) tall, 80m (262 ft) wide and 1,350m (4429ft) deep.
- 2.3 The developer is offering £15,000 towards bus stop and pedestrian improvements along Newmarket Road; this would need to be secured as part of a S106.
- 2.4 The application has been referred to Planning Committee, due to the size of the proposal and in accordance with Council's Constitution.
- 2.5 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link <http://pa.eastcambs.gov.uk/online-applications/>. **Alternatively a paper copy is available to view at the East Cambridgeshire District Council offices, in the application file.**

3.0 PLANNING HISTORY

3.1

13/00965/FUM	Extension of two existing buildings on site. One to provide additional packing facilities and personnel amenities. The second to provide additional sub-zero racked storage and marshalling.	Approved	02.04.2014
13/00965/DISA	To discharge conditions 6 (Energy Statement), 7 (Surface Water Drainage)	Conditions discharged	04.07.2018

and 8 (Contamination) of Decision dated 09/04/2014 for the extension of two existing buildings on site. One to provide additional packing facilities and personnel amenities. The second to provide additional sub-zero racked storage and marshalling.

09/00098/FUM	Extension of existing cold storage	Approved	11.05.2009
05/00575/FUM	Construction of a new cold store, associated amenities, external works, drainage and blast freezing facilities.	Approved	02.08.2005
96/00957/FUL	Extension to existing cold store complex (7443 m2)	Approved	06.03.1997
94/00729/FUL	Extension to existing cold store complex to provide distribution service to retail trade and additional low-temperature store	Approved	07.12.1994
92/00792/FUL	Blast Freezer Associated with Approved Cold Stores	Approved	20.01.1993

4.0 THE SITE AND ITS ENVIRONMENT

- 4.1 The site is just over 1 mile south of Fordham and 3.5 miles north of Newmarket on the A142. Cambridge is approximately 15 miles to the south west and accessed south of the site at Junction 37 onto the A14.
- 4.2 To the north and west is open countryside, to the east is the LGC site (recently delegated approval to the Planning Manger by committee for a number of extensions) and to the south is DS Smith. The A142 defines the north and east boundary; with the railway line defining the west boundary.
- 4.3 The current Turners site is primarily two sets of large buildings surrounding a central courtyard where lorries manoeuvre and access the public highway to the south of the site.

4.4 The proposed extension and lorry park are in the northwest corner of the existing compound; with the lorry park being on land currently left as agricultural.

5.0 RESPONSES FROM CONSULTEES

5.1 The full responses are available on the Council's web site.

Planning Casework Unit – (22 August 2018) No comments to make on this proposal.

Fordham Parish Council – (6 September 2018) No concern in regards to this application.

Design Out Crime Officers (Police) – (1 June 2018) Supports the application but would recommend they seek security advice.

(15 August 2018) Requests previous comments are referred to.

HSE (Planning Advice Team) – (4 June 2018) Suggests that the Local Planning Authority refer to its Planning Advice Web page.

(8 August 2018) Suggests that the Local Planning Authority refer to its Planning Advice Web page.

(23 August 2018) In response to a question from the Case Officer states that Planning (Hazardous Substances) Regulation 2015. The controlled quantity is 50 tonnes and over of anhydrous ammonia; while the proposal only has 15 tonnes. So the proposal will not require consent unless other hazardous substances.

Separate legislation does exist under the Health and Safety at Work Act 1974.

National Grid – (20 June 2018) Places a holding objection as the development will need to cross a high pressured gas main. It provides substantial detail on this point.

Cadent – (7 June 2018) Will contact the developer to discuss the proposal in relation to its assets.

Environment Agency – (13 June 2018) States that the site could cause contamination in area of ground water protection (SPZ).

It recommends approval, subject to conditions in regards to contamination, surface water control and foundations.

(30 August 2018) States a “new preliminary risk assessment (PRA) should be prepared for the site to include an assessment of land and groundwater in the location of the proposed developments at the site.”

(23 October 2018) Please refer to previous comments on the 13 June and 30 August 2018.

(19 November 2018) Environment Agency emailed the developer stating that the surface water condition will only be discharged after a land contamination condition has been discharged. This email was forwarded to the Case Officer by the Agent.

Lead Local Flood Authority – (18 June 2018) It objects to the proposal due to insufficient information.

(18 September 2018) – Further information is needed to know what the ground water level is.

Environmental Health – (15 June 2018) States that any additional operational noise is likely to be unnoticeable. It does seek a condition in regards to construction work/deliveries timeframes.

(7 August 2018) Please refer to previous comments.

Environmental Health Scientific – (15 August 2018) States that the proposal is unlikely to have any significant impacts on human health.

Tree Officer – (28 June 2018) Insufficient information to assess the proposal and seeks that a full Landscape Impact Assessment is provided.

Trees and Landscape Consultant – (24 October 2018) States that the stormwater swale as part of the SuDS is a welcome feature but will lead to a gap in the bund. Wetland planting (eg willows) would address this and enhance the biodiversity potential.

Proposed landscaping schedule for the bund requires adjustment to improve effectiveness. The number of taller trees needs increasing; recommends birch and alder.

All existing bunding within the site should be retained for at least 10 years to allow the new bund a chance to establish.

Seeks a landscape management plan.

Suffolk County Council Highways Authority – (20 June 2018) Does not wish to object to the proposal. The increase in frozen product will lead to a reduction in HGV movements on the highway network. Potential increase in employee vehicle movements is not likely to cause a severe impact on the highway network.

(29 November 2018) Proposal should include a Transport Assessment as this will demonstrate the reduction in trips arising from the change in use or operation.

Once a Transport Assessment is submitted would like to review the proposal again to check impacts on its road, specifically junction 37 on the A14

(19 December 2018) States:

“On the basis that there would be an overall reduction in trips arising from this application, which is my reading of their letter, there would be no additional

highways impacts on the A14/A143 junction and therefore a S106 contribution would not be justified from this site.”

Transport Assessment Team - (22 June 2018) A proposal of 8, 982 square metres requires a Transport Assessment to be submitted to determine the impact on the highway network. States that the application should not be determined until this information is provided.

(10 September 2018) A full Transport Assessment is needed to determine the impact on the highway network. The proposed unit could be sold off at any point and be operated as a separate industrial unit without needing any new planning permission.

A TRICS assessment should be undertaken, committed development should be included and a capacity assessment of the A142/Landwade Road roundabout should be undertaken to fully determine the impact on the public highway. Once distribution is known, additional junctions may need to be assessed.

A decision should not be made until the required information is submitted.

(22 October 2018) New information does not overcome previous concerns.

(14 December 2018) States:

“Having assessed the transport information submitted with the planning application, it is disappointing to see that a full transport assessment, assessing the impacts of the development in accordance with CCC’s TA Guidance has not been provided.

The information provided states that due to a change from chilled storage to frozen storage the site as a whole would generate less vehicular movements. Therefore any new movements generated by the proposed development would not be an increase in vehicular movements. This has been agreed with in a letter by the Food Storage and Distribution Federation.

The case office has confirmed that a condition could be applied to any permission granted to limit the use of the proposed extension to frozen food only in perpetuity.

Therefore the Transport Assessment Team do not wish to object to the application subject to a condition being applied to limit the use of the extension to frozen food only, in perpetuity.”

Highways England – (31 August 2018) Recommends that approval is not granted for a specific period of time. It requires more information to assess the additional impact on the A14 trunk road.

(25 September 2018) – Offers no objection, as the proposal will involve a reduction in the number of vehicles accessing and leaving the site.

Cambridgeshire Archaeology – (6 July 2018) States that the site is in a high archaeological potential. The original development over an area of crop marked enclosures, thought to be possible ring ditches indicating the locations of ploughed

out round barrows (burial mounds), which were visible on previous aerial photographs of the site.

A previous archaeological dig to the north (within 100m) found a cremation site and two early Bronze Age barrows. In addition 21 cremation burials was also found.

It is considered that further remains could survive within the area proposed for the extension as suggested by the earlier crop marks, which now lie below the hardstanding of the compound.

Does not object but seeks a pre-commencement condition.

(7 August 2018) See previous advice.

(12 November 2018) – The developer's submitted archeological report deals with land to the north east corner of site, which demonstrates the archaeological potential within the area.

The submitted evidence does show clearly that an archaeological survey is still needed.

(7 December 2018) – The submitted additional information does not provide anything new. The applicant should be made aware that we consider any ground intrusion in the areas indicated for the extension to the cold store and for the lorry parking to the north to require an archaeological investigation.

States that the construction work will lead to substantial harm on any sub surface archaeological remains.

No archaeological survey has covered the area in question, but previous investigations have shown the highly rate archaeological potential in this area.

(20 December 2018) States:

"In response to the latest comments from Edwin Bowater of FJB Systems (dated 15th December 2018) I would like to address the points made regarding construction methodologies and their relation to depths of ground disturbance caused by agricultural activity with consequent predicted impacts on the sub-surface archaeological remains, as follows:

a) Extension of the coldstore on the existing 'main' site.

As detailed in the correspondence between Dan McConnell of this office and Edwin Bowater dated 24th March 2009 (a copy supplied with Mr Bowater's previous letter), there was an unequivocal recommendation that the area of land north of the build footprint of the proposals dealt with under application ref 09/00098/FUM, along with the agricultural field to the north, would require an archaeological evaluation in advance of development. I have examined the East Cambridgeshire planning portal at some length and I am afraid I cannot see the relevant application for the area of hardstanding used for lorry parking which the aerial imagery indicates now occupies this part of the site.

Having examined the aerial imagery for land usage back as far as 2009 it is indisputable that the construction of this lorry park will have caused some degree of damage to sub-surface archaeological remains, and a consequent reduction in significance in heritage terms as defined by the NPPF. Although the construction methods entailed in forming a hard surface sufficient for the requirements of HGV usage and the impact damage caused by their presence will therefore have occasioned removal of or crushing damage to ephemeral features, including possible burials in this area, deeper features may still be expected to survive, albeit in a truncated state. On the northern part of the site where excavated features were found cut into the natural chalky marl geology, pits containing cremation burials extended to depths between 150mm and 1000mm below the ground surface. The deep perimeter ditches of the barrow burials, containing significant quantities of Bronze Age finds, extended to depths of 1500mm according to the published reports (Cambridgeshire Historic Environment Record reference ECB3854, following on from evaluation ECB3754). It is our opinion that construction impacts caused while building the lorry park will have occurred on underlying archaeological remains, however to have any certainty of this we would need to understand depths and construction methods utilised in this area to be able to comment further. If you are able to supply the relevant planning documents for review this would be much appreciated.

b) Construction of a lorry park on the northern site.

It would appear from further examination of the aerial imagery that the lorry park that was constructed under 11/00681/FUL is substantially larger than that for which permission was obtained. The previous archaeological investigations conducted within the area (for which permission was granted under this and 10/00607/FUM combined) revealed two early Bronze Age barrows, with associated subsidiary inhumation burials, separating a cemetery of 21 late Bronze Age cremations (ECB3754 and ECB3854, as above). This area of investigation took place within the same previously agricultural land parcel as the land now proposed for development under 18/00579/ESF, subject to the same agricultural land-management techniques, and consequently with the potential for similar levels of archaeological survival expected.

Measures for the preservation *in situ* or mitigation via an excavation strategy to preserve archaeological remains by record can only be designed following an archaeological field evaluation that will present adequate evidence of the depth of overburden and the character and significance of any archaeological remains present. This should be secured by the inclusion of a negative condition, as previously recommended, on any permission East Cambridgeshire District Council are minded to grant. In their letter of 15th December FJB Systems provide a proposal based on a notional understanding of overburden depths to the top of the 'structureless chalk' substrate. This is given to be 300mm which we know from previous archaeological fieldwork to be incorrect. Photos in the soakage test report accord with this understanding. The proposal to extend a hardcore slab into the top of the chalk substrate will surely encounter archaeological remains, should they be present. The only way that we can determine their presence is through field evaluation in line with para 189 of the NPPF:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Following the field evaluation, the applicant would need to re-engage with this department to determine whether preservation *in situ* would be possible or appropriate strategy for this development, to discuss appropriate construction methodologies and agree any high-risk areas that could be omitted from the scheme. Having determined that non-designated prehistoric heritage assets, including human burials, exist in the immediately adjacent land parcel to the east developed as an extended lorry park and also beneath the Fordham by-pass, and that the scale of harm on similar remains would be substantial due the impact of the development, the reference made to reducing the scale of impact by developing a ground slab is not supported by the other needs of the development such as swales, drainage and the impacts caused by vehicular movements and temporary works needed to construct the development.

We do not accept the applicant's view that the time taken to conduct such an archaeological investigation would render the proposals unsustainable. The applicant was notified in 2009 of the need to address archaeological matters within the proposed development area, as evidenced by the correspondence they have on file (a copy of which has been supplied by FJB Systems in support of the current application) and this was reiterated in our direct consultation response on 6th July 2018.

I would reiterate that this department is particularly concerned about development on this site due to the confirmed presence of human skeletal remains and funerary monuments (including barrows and flat grave cemeteries) in close proximity to the areas outlined for development under the latest proposals. We would remind the applicant that undertaking development without archaeological works to establish the presence/absence and condition of further remains in this highly archaeologically significant area risks contravention of the Burials Act (1885, and clauses since), as well as current Ministry of Justice guidance, which states that it is illegal to disturb such remains without a relevant licence."

(21 December 2018) States:

"Therefore, we consider that the section shown in the letter of 15th Dec to be notional. In other words, to prepare the lorry park they will need to strip to the natural substrate – this is the at heart of the matter - damage will be incurred through vehicular movements to any archaeology present and for this reason we have advised you to require an archaeological programme of work, first to evaluate and then to decide on areas for mitigation (should this become necessary).

In the recent EPS letter that you have just forwarded (dated 13 Nov 2018) it is noted that the max topsoil depth is 400mm (0.4m). As before, the archaeological trench evaluations demonstrated variability as the surface of the chalk is not flat but undulates. 400mm is, though a useful average depth. If the southern lorry park had been stripped to the top of the chalk then we must assume that the damage has already been done to any archaeological deposits and features present, potentially including human burial evidence. The impact of vehicular movements and construction works on the stripped area to form the hard standing cannot be underestimated - we can supply evidence of vehicular rutting extending to kneecap depth in wet weather conditions. We cannot remediate such damage but manage future development with the utmost care. I consider it appropriate to drop the southern field from the consent you are minded to grant but ensure that any consent carries a condition that prevents against unauthorised and unmitigated temporary or permanent works...we recommend that you require that the **whole** of the north field to be subject to archaeological evaluation in order that appropriate mitigation works can be designed for this development should be needed be proven.

As mentioned on the phone, Turners have three times now used areas for temporary works or have extended lorry parks without approval, creating hardstanding surfaces in these areas and assuming that no damage to archaeological deposits will have been done. This is unacceptable unilateral practice and contravenes the Historic Environment policies of NPPF. We have informed you of the archaeological sensitivity of this landscape area known from our Historic Environment Records and from archaeological examinations at the Fordham bypass to the north, at the Horse Forensic Lab site adjacent to the scheduled monument of a Roman villa, Turners' own site and that to the south – at the David Smith site, where an extensive Iron Age settlement was excavated in 1999-2000. We wish to work with Turners to expedite an evaluation of this area so that any detailed excavation of significant archaeological evidence can occur before their proposed spring time start date, though I have to say I consider this to be too compressed a timetable to allow such work to occur.”

Economic Development – Been kept up to date with the application.

Forrest Civil Aviation Authority - No Comments Received

CCC Growth & Development - No Comments Received

Cambridgeshire Fire and Rescue Service - No Comments Received

National Grid - Electricity - No Comments Received

Network Rail - No Comments Received

The Ely Group of Internal Drainage Board - No Comments Received

Cambridge Ramblers Association - No Comments Received

Asset Information Definitive Map Team - No Comments Received

Ward Councillors - No Comments Received

5.2 Neighbours – 19 neighbouring properties were notified, a notice put in the press on the 7 June 2018 and two site notices put up on the 24 August 2018. No comments have been received.

6.0 The Planning Policy Context

6.1 East Cambridgeshire Local Plan 2015

GROWTH 1	Levels of housing, employment and retail growth
GROWTH 2	Locational strategy
GROWTH 3	Infrastructure requirements
GROWTH 4	Delivery of growth
GROWTH 5	Presumption in favour of sustainable development
FRD 7	Employment allocation, land south of Landwade Road
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy efficiency and renewable energy in construction
ENV 7	Biodiversity and geology
ENV 8	Flood risk
ENV 9	Pollution
ENV 12	Listed Buildings
COM 7	Transport impact
ENV 14	Sites of archaeological interest
COM 8	Parking provision

6.2 Supplementary Planning Documents Design Guide Developer Contributions Cambridgeshire Flood and Water

6.3 National Planning Policy Framework 2018

Chapter 2 Achieving sustainable development
Chapter 6 Building a strong, competitive economy
Chapter 8 Promoting healthy and safe communities
Chapter 9 Promoting sustainable transport
Chapter 12 Achieving well designed places
Chapter 14 Meeting the challenge of climate change, flooding and coastal change
Chapter 15 Conserving and enhancing the natural environment
Chapter 16 Conserving and enhancing the historic environment

6.4 Submitted Local Plan 2018

LP1	A presumption in Favour of Sustainable Development
LP2	Level and Distribution of Growth
LP8	Delivering prosperity and Jobs
LP16	Infrastructure to Support Growth
LP17	Creating a Sustainable, Efficient and Resilient Transport Network
LP18	Improving Cycle Provision

LP20	Delivering Green Infrastructure, Trees and Woodland
LP22	Achieving Design Excellence
LP23	Water Efficiency
LP24	Renewable and Low Carbon Energy Development
LP25	Managing Water Resources and Flood Risk
LP26	Pollution and Land Contamination
LP27	Conserving and Enhancing Heritage Assets
LP28	Landscape, Treescape and Built Environment Character, including Cathedral Views
LP30	Conserving and Enhancing Biodiversity and Geodiversity
FRD.E1 (a) – (g)	Employment Cluster, South of Fordham

7.0 PLANNING COMMENTS

- 7.1 An Environmental Impact Assessment (EIA) has been undertaken by the applicant to consider the likely significant environmental effects of the proposal and an Environmental Statement (ES) has been submitted. The ES has been informed by a formal screening opinion from the Council in May 2018 and is compliant with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 7.2 The ES addresses the likely environmental effects of the proposal each of which will be covered in this report.
- 7.3 The main issues to consider in determining this application are, the principle of development, visual impact, access, parking and impact on the transport network, impact on residential amenity, impact on heritage assets and archaeology, flood risk, impact on ecology, trees and landscaping, socio-economics, air quality, contamination, cumulative impacts and BREEAM/sustainability.
- 7.4 Principle of Development
- 7.5 The extension element is within the existing compound of Turners; the provision of a new warehouse in this location is not covered by any specific policy in the Adopted Local Plan, though is covered by policy FRD.E1 (b) in the Submitted Local Plan.
- 7.6 Policy GROWTH 1 encourages the creation of further employment opportunities within the District including making provision for a deliverable supply of at least 179ha of B1/B2/B8 employment land. Employment uses comprised under B1/B2 and B8 play an important role in the Council's growth strategy and therefore the Council will seek to protect these land uses.
- 7.7 Policy EMP2 allows for extensions to existing businesses in the countryside, subject that it does not:
- Harm the character and appearance of the area.
 - In scale with the location and would not have a significant adverse impact on the road network.
 - Is for the existing businesses.
 - Does not harm residential amenity.

- 7.8 Policy FRD.E1 (b) allows for B8 use class but seeks to ensure:
- Improvements to bus lay-bys and bus stops on Newmarket Road.
 - Pay particular regard to archaeological potential and significance on the site.
 - Must protect and enhance landscape, heritage and biodiversity.
 - Consider the potential for providing a small lorry park, with appropriate facilities for drivers.
- 7.9 The proposal for a B8 warehouse for frozen goods to be used as part of Turners operation on site is therefore in principle supported. The specific requirements under these policies is covered below in great detail.
- 7.10 The proposed lorry park is seeking to move the current lorry storage area (where the extension is going) into a new location. When the Case Officer visited this existing area it was being used for storage of primarily trailers that appeared in need of repair.
- 7.11 The area for the new lorry park is covered by policy FRD 7 of the Adopted Local Plan that allows for B8 use class development. This policy requires development to:
- Ensuring the proposal is of high quality and minimises the visual impact from the A142.
 - Include a variety of building heights and not to exceed 9 metres.
 - Provide extensive landscaping and planting area, particularly adjoining the A142.
 - Be accessed via the existing Turners site to the south.
 - Provide contributions towards the creation of two bus lay-bys, bus stops and pedestrian crossing facility on Newmarket Road.
 - Take account the location of the National Grid's Gas transmission pipeline.
 - Demonstrate capacity in the sewage treatment works and the foul sewerage network.
- 7.12 In the Submitted Local Plan it is covered by FRD.E1 (A) which again supports B8 use class but again seeks to secure:
- Improvements to bus lay-bys and bus stops on Newmarket Road.
 - Pay particular regard to archaeological potential and significance on the site.
 - Must protect and enhance landscape, heritage and biodiversity.
 - Consider the potential for providing a small lorry park, with appropriate facilities for drivers.
- 7.13 The proposal for a B8 lorry park is therefore in principle supported. The specific requirements under these policies is covered below in greater detail.
- 7.14 This area of the district is defined by employment sites and the economic benefits of promoting economic growth for all businesses in this area, weighs heavily in favour for this application. It should be noted that the support of one business must not detrimentally harm the economic potential for the surrounding businesses.
- 7.15 Highways (specific issue covered by the Environmental Statement)

- 7.16 Within the Environmental Statement (page 59 - 60) it states that Turners are seeking to transition from chilled storage/distribution to frozen storage/distribution and that the proposed lorry park is a relocation of an existing lorry park where the extension is proposed. The Environmental Statement concludes that the proposal will reduce the number of lorries in/out of the site by approximately 196 movements per week.
- 7.17 The developer provided additional information on the 8 October 2018 to justify that the additional growth will reduce lorry movements. The first piece of evidence is from The Food Storage and Distribution Federation that states chilled lorries usually leave the site 85% - 95% full; while frozen goods lorries leave 98 – 100% full; in short for every 10 chilled lorry movements there is only a need for 9 frozen lorries. This makes logical sense as chilled goods have a far more limited shelf lifespan and cannot wait until a single lorry is full.
- 7.18 The developer has stated (Transport Statement page 17) that it seeks to convert 5,000 chilled pallets to frozen that will reduce the amount of lorry movements from 412 lorry movements per week to 43. The evidence submitted also states that this significant reduction is based on the fact that frozen goods have a 9 week frozen storage period; this provides the more substantial decrease in lorry movements. The creation of 20,000 frozen pallets will generate 172 lorry movements per week. The development would lead to approximately the reduction in lorry movements by a half entering/leaving the site.
- 7.19 The proposal will, therefore, have no impact on the wider highway network as the proposal will lead to a reduction in lorries entering/leaving the public highway. However, this is based on the presumption that existing chilled space is transferred to frozen goods only in perpetuity; without the loss of chilled space the proposal would lead to 172 additional lorry movements per week that could be detrimental to the highway network. A condition to control the loss of chilled space is therefore fundamental, otherwise the application would be refused on lack of a Transport Assessment and the failure of the developer to mitigate against the harm identified in the Environmental Statement. Turners accept the need for a condition in order to make their development acceptable. The 9 week turnaround of frozen goods cannot be specifically controlled by a condition but this demonstrates that the very specific use of the proposal will place a much lower burden on the highway that is backed up by the Transport Team at County Council and Suffolk County Council.
- 7.20 Turners have offered £15,000 towards improvements to public transport/footpaths in the area. This is considered on balance a relatively reasonable contribution. The proposal will lead to 18 more employees, which will only lead to a very modest increase in traffic entering and leaving the site. However, it is required by both adopted and proposed policy.
- 7.21 The number of lorry movements is reducing substantially by virtue of the proposal and that will lead to a net benefit on the local transport network; thus saving the public purse.
- 7.22 The construction of such a significant building is likely to have unknown impacts (primarily on the highway network) and for this reason it is considered a Construction Environmental Management Plan (CEMP) would be needed to

protect the free flow of traffic. The CEMP would also likely help protect the workers on the site and keep potential dangers away from the railway line.

- 7.23 There is already significant amount of parking at the front of the site and this is considered sufficient to cover the increase of employees on the ground.
- 7.24 The proposal is considered to be in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015 and LP17 of the Submitted Local Plan 2018.
- 7.25 Residential Amenity
- 7.26 By virtue of its location the proposed development is not considered to cause any undue overbearing, loss of light or loss of privacy to any residential property. The greatest danger the proposal will create is a potential substantial ammonia leak, where the anhydrous ammonia was to travel at ground level in a northeast direction. It is considered that due to the distance to the residents of Fordham and that no additional ammonia is being stored on site that the risk to human health/life is very low from the proposal.
- 7.27 The Environmental Statement (page 44) states that the relevant infrastructure for the ammonia will be built to the latest standards.
- 7.28 The proposed is considered to comply with policy ENV2 of the Adopted Local Plan and LP22 of the Submitted Local Plan.
- 7.29 Visual Amenity (specific issue covered by the Environmental Statement)
- 7.30 Policies ENV1 and ENV2 of the East Cambridgeshire Local Plan 2015 stress the desire to protect important views into and out of settlements, space between settlements and their wider landscape setting, visually sensitive natural and man-made skylines, hillsides and geological features and views of key landmark buildings. This reflects the Government's objectives in terms of protection of the countryside and landscapes more generally, set out in paragraph 170 of the NPPF, which states that the planning system "*should contribute to and enhance the natural and local environment*". The need to recognise "*the intrinsic character and beauty of the countryside*" is also enshrined as a core planning principle in paragraph 170 of the NPPF.
- 7.31 There is no published guidance establishing a threshold beyond which visual impacts should be deemed unacceptable, and it is for the decision maker in each case to determine how much weight landscape and visual effects should attract in the planning balance.
- 7.32 The Environmental Statement (pages 56 – 57) states that a relatively small (in length) new bund with landscaping would hide the proposal when travelling directly south along the A142 within 10 years; only very partial obscurity in the 1st year after the new bund is created. It goes on to state that further mitigation could be achieved by extending the bund across the entire northern boundary of the site.

- 7.33 The developer submitted amended plans of the proposed bund on the 6 October 2018 showing the 3m high bund extending across a much larger proportion of the northern boundary in order to overcome concerns of the Case Officer.
- 7.34 The proposal seeks to provide a new warehouse that measures 22m (72ft) tall, 80m (262 ft) wide and 1,350m (4429ft) deep. The existing buildings are clearly visible from the A142, with the existing bund while tall (5m/16.4 ft) only offering minimal screening to the large warehouse buildings (22m/72 ft high) to the south. The trees along the northern boundary of Turners site are primarily within the public highway. The view from the A142 is both a public view and one that will be seen by every driver/passenger heading south along the A142 (Ely to Newmarket).
- 7.35 To create the new lorry park the existing bund will be cut through, substantially reducing it in length, and repositioned. However, the developer is also providing a new bund along the northern boundary that will measure 3m high (9.8 ft). If suitable tree planting is provided this bund will obscure most of the existing and proposed Turners site from the travellers of the A142, as it will create a natural 'green' barrier to the A142. Without this proposed bund the combined harm (proposed and existing buildings) to the visual amenity to the users of the A142 would be significantly detrimental.
- 7.36 There is a break in the bund where the SuDS swale is being located. However, this is fortunately set behind the existing street trees that already help to obscure the Turner's site (though these should not be relied upon as they are controlled by a third party); future landscaping can be secured to the south of the swale to provide a second planting screen.
- 7.37 A condition requiring that the existing bund (as substantially altered by the proposal) and the proposed bund to be maintained in perpetuity is therefore required in order to prevent significant and detrimental harm to the character of the area.
- 7.38 In addition a soft landscape condition will be needed to ensure an appropriate tree mix on the bund and around the swale is required in order to help obscure the proposed built form and that it needs to be maintained for at least 10 years in order to mitigate against the size of the proposal.
- 7.39 The design and scale of the proposed extension is in keeping with the existing Turners' buildings in the area and is therefore an in keeping design.
- 7.40 There is an existing lorry park to the east of the proposed lorry park that at present is visible from the A142, with the proposed bund/landscaping any views of the new lorry park will be obscured.
- 7.41 The proposal would be considered to cause significant cumulative impact on the landscape if the bund and landscaping were not proposed but the visual impact can be mitigated with the creation of a bund along the northern boundary and associated landscaping secured by condition to ensure the proposal complies with policies ENV1 and ENV2 of the East Cambridgeshire Local Plan 2015 and LP22 of the Submitted Local Plan 2018.
- 7.42 Historic Environment

- 7.43 To the north of the site is the Grade II Listed Building of Fordham House, beyond this is the Grade II Listed Building of Fordham Abbey and to the east is the Grade II Biggen Stud. With the existing size of the Turner's buildings the addition of this extension is considered to cause, at worst, the lowest level of less than substantial harm and would be outweighed by the economic benefits the proposal would bring by the reduction in lorry movements and the provision/securement of employment. It could also be argued that the setting of all these listed buildings does not go further south than the edge of the A142 that forms the boundary of the site.
- 7.44 The County Council archaeology experts have sought an archaeological investigation for both elements of the proposal. With the additional explanation provided on the 20 December 2018 by County Council it is considered that there is highly important potential archaeology on the site that could be lost or damaged by the proposal.
- 7.45 It is noted that on previous applications (09/00098/FUM and 13/00965/FUM) no archaeological investigations were needed. In relation to the 2009 application this was because of the impact that landscaping already had on the area. An email from a County Council Archaeologist to the developer made it clear in 2009 that the land to the north of the built footprint and the recently purchased fields would require an archaeological investigation.
- 7.46 The NPPF para 11.d.i makes it clear that assets of archaeological interest deserve substantial protection. The creation of development would likely lead to the total loss of archaeology in the areas proposed for development. With the high value of the potential archaeology in the area and that it can be suitably mitigated against by carrying out a suitable investigation; the NPPF would promote an archaeological condition.
- 7.47 The Submitted Local Plan that was published in November 2017 highlighted the importance of archaeology in the area for both the extension and replacement lorry park.
- 7.48 The developer has made the Case Officer aware that while it would accept an archaeological investigation on the northern field (location of replacement lorry park) it would not accept an archaeological condition for the proposed building extension site. The Case Officer has sought several times for clarification and guidance from County Council and it is concluded that the developer has already substantially damaged the archaeological potential under the existing lorry park by the carrying out of works. The developer was warned about the need for archaeological investigation due to the archaeological potential of the site in 2009, it therefore has to be considered that the works carried out may have caused damage to archaeological deposits, which contravenes the Historic Environment policies of the NPPF. This could have been avoided as the developer is and was fully aware of the potential of the site. Based on the above and the ongoing discussions with the County Council the recommended archaeology condition will not cover the area of the proposed building extension, where the existing lorry park is in situ, but will cover the rest of the site. In order to prevent further significant harm to archaeology a condition is recommended removing permitted development rights relating to hard landscaping.

- 7.49 The proposal is, therefore, considered to comply with policies ENV12 and ENV14 of the adopted Local Plan and LP27 of the Submitted Local Plan; as well as the provisions of the NPPF.
- 7.50 Ecology
- 7.51 The site is well separated from the SSSI's located to the southeast, east and northeast of the site (LGC and the A142 is situated in between). The only likely detrimental impact on these SSSI's is if there is ammonia leak (which is already held on site) and the wind was blowing in this direction.
- 7.52 The proposed extension is being located on existing hard landscaping the potential for biodiversity in this area is considered to be very low and even with the removal of the bund the potential impact on any protected species is considered to be negligible.
- 7.53 In regards to the Lorry Park there is a major road to the north (A142) and a major railway to the west. A previous application for a lorry park to the east (11/00681/FUL) made no reference to any harm to biodiversity. The chance of substantial ecology on this part of the proposal is again considered to be negligible.
- 7.54 Both the Adopted and Submitted Local Plan requires all proposals to enhance ecology in the local area. This can be achieved through the provision of bird and bat boxes on the proposed extension and the provision of substantial soft landscaping along the northern boundary. These biodiversity improvements can be achieved by a condition.
- 7.55 The proposal is considered to be in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015 and LP28, LP22 and LP30 of the Submitted Local Plan 2018.
- 7.56 Flood Risk and Drainage
- 7.57 The proposed extension, while a major development, is being built on an existing area of hard standing. The drainage difference between this existing lorry park and the proposed extension is considered to be minimal. The creation of the new lorry park will have a significant impact on drainage in the locality, as it will be constructed on greenfield.
- 7.58 The Environment Agency (EA) is seeking pre-commencement conditions in regards to potential contamination in order to protect controlled waters. This condition is considered reasonable as the EA has made it clear the site is in close proximity to strategic water supplies.
- 7.59 The Case Officer has been speaking to the Lead Local Flood Authority (LLFA) and it considered in this case a pre-commencement condition would overcome the LLFA's concerns. If the proposed swale feature would not be able to deal with all the run off from the proposed lorry park than other solutions would be possible (for instance tanking or permeable surfaces). This unknown method of water drainage adds weight to the need for an archaeological condition.

- 7.60 The proposal is considered to be in accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015 and LP22 and LP25 of the Submitted Local Plan 2018
- 7.61 Other Material Matters
- 7.62 There is a gas main that runs through the site where the proposed lorry park will be located; an informative should be added to ensure that the developer works with Cadent to ensure this infrastructure is duly protected. While Cadent now control the gas main, the National Grid have objected. However, National Grid's comments relate to how the construction work will take place and this can be secured under the CEMP condition.
- 7.63 The developer should contact the Police in order to discuss safety measures and they may also want to keep the Fire Service updated due to the size and nature of the proposal.
- 7.64 With the nature of the proposal a BREEAM (promoted in ENV4 of the Adopted Local Plan) sustainability report will not offer the best method to ensure a high level of sustainability in this case. A condition is still required but it would seek renewable energy/efficiency (promoted in the Submitted Local Plan); other conditions will provide for sustainable water drainage and biodiversity improvements. The combination of all these conditions will ensure the proposal meets with the requirements of sustainable development.
- 7.65 Planning Balance
- 7.66 The matter of assessing the benefits of a proposal against the harm caused is one for the decision maker and there are no set limits or thresholds, which must be met or passed in order for a decision to be made either in favour of or against a proposal. Where a proposal comes into conflict with the Development Plan and government policy, in the form of the NPPF, this must weigh significantly against the development when reaching a planning judgement.
- 7.67 The conclusions within the Environmental Statement are agreed. Recommended conditions will secure mitigation measures and are set out within this report.
- 7.68 The economic growth of all businesses in this area is a fundamental priority to ensure the overall sustainability of both the adopted and submitted local plans in ensuring local employment growth. With the proposal only creating a very modest increase in employment numbers on the site, the main economic benefit is the future proofing of the existing business and the reduction in the number of lorry movements.
- 7.69 By controlling the specific use of the proposal, converting existing cold storage to frozen and the provision of an additional bund the proposed development complies with the conclusions/mitigation of the Environmental Statement. The proposal, subject to conditions, will not have a significant impact on either the transport network or visual character of the area. The failure to comply with those conditions that relate to the Environmental Statement will result in enforcement action by the

Local Planning Authority, as all parties consider these fundamental to the accepting of this scale of development.

7.70 The proposal is considered to largely comply with the development plan and there are no other material planning considerations which would cause demonstrable harm in planning terms which would warrant the refusal of planning permission, subject to the conditions outlined and a S106 contribution.

7.71 The proposal is, therefore, recommended for delegated approval.

8.0 COSTS

8.1 An appeal can be lodged against a refusal of planning permission or a condition imposed upon a planning permission. If a local planning authority is found to have acted unreasonably and this has incurred costs for the applicant (referred to as appellant through the appeal process) then a cost award can be made against the Council.

8.2 Unreasonable behaviour can be either procedural ie relating to the way a matter has been dealt with or substantive ie relating to the issues at appeal and whether a local planning authority has been able to provide evidence to justify a refusal reason or a condition.

8.3 Members do not have to follow an officer recommendation indeed they can legitimately decide to give a different weight to a material consideration than officers. However, it is often these cases where an appellant submits a claim for costs. The Committee therefore needs to consider and document its reasons for going against an officer recommendation very carefully.

8.4 In this case members' attention is particularly drawn to the following points:

- Site is allocated for development.
- Details contained within the Environmental Statement.

9.0 APPENDICES

9.1 Appendix 1 - Conditions

<u>Background Documents</u>	<u>Location</u>	<u>Contact Officer(s)</u>
18/00579/ESF	Andrew Phillips Room No. 011 The Grange Ely	Andrew Phillips Planning Team Leader 01353 665555 andrew.phillips@ea stcambs.gov.uk
13/00965/FUM		
13/00965/DISA		
09/00098/FUM		
05/00575/FUM		
96/00957/FUL		
94/00729/FUL		
92/00792/FUL		

National Planning Policy Framework -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

East Cambridgeshire Local Plan 2015 -

<http://www.eastcambs.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover.pdf>

APPENDIX 1 - 18/00579/ESF Conditions

- 1 Development shall be carried out in accordance with the drawings and documents listed below

Plan Reference	Version No	Date Received
17088 TURN 11	Sheet 1 of 4	6th October 2018
17088 TURN 11	Sheet 2 of 4	6th October 2018
17088 TURN 11	Sheet 3 of 4	6th October 2018
17088 TURN 8	2	21st May 2018
17088 TURN 8 SHEET 1 OF 2	2	21st May 2018
7088 TURN 8 SHEET 1 OF 2	2	21st May 2018
17088 TURN 10	2	22nd June 2018
17088 TURN 4		21st May 2018
17088 TURN 1		21st May 2018
17088 TURN 2		21st May 2018
17088 TURN 3		21st May 2018
17088 TURN 6		21st May 2018

- 1 Reason: To define the scope and extent of this permission.
- 2 The development hereby permitted shall be commenced within 2 years of the date of this permission.
- 2 Reason: To comply with Section 91 of the Town and Country Planning Act 1990, as amended.
- 3 The proposed extension shall be used for only frozen goods storage (room temperature shall not exceed 0C) in perpetuity.
- 3 Reason: In the interests of highway safety and capacity, in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015 and LP17 of the Submitted Local Plan 2018. This condition is informed by the mitigation measures within the Environmental Statement.
- 4 Prior to the commencement of development, an energy and sustainability strategy for the development, including details of any on site renewable energy technology and energy efficiency measures, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved strategy.
- 4 Reason: To ensure that the proposal meets with the requirements of sustainability as stated in policy ENV4 of the East Cambridgeshire Local Plan 2015 and LP23 and LP24 of the Submitted Local Plan 2018. This condition is pre-commencement as some of the measures may be below ground level.
- 5 No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority: 1. A Preliminary Risk Assessment (PRA)

including a Conceptual Site Model (CSM) of the site indicating potential sources, pathways and receptors, including those off site. 2. The results of a site investigation based on (1) and a detailed risk assessment, including a revised CSM. 3. Based on the risk assessment in (2) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken. The strategy shall include a plan providing details of how the remediation works shall be judged to be complete and arrangements for contingency actions. The plan shall also detail a long term monitoring and maintenance plan as necessary. 4. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the remediation strategy in (3). The long term monitoring and maintenance plan in (3) shall be updated and be implemented as approved.

- 5 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015 and LP26 of the Submitted Local Plan 2018. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 6 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported to the Local Planning Authority within 48 hours. No further works shall take place until an investigation and risk assessment has been undertaken and submitted to and approved in writing by the Local Planning Authority. Where remediation is necessary, a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. The necessary remediation works shall be undertaken, and following completion of measures identified in the approved remediation scheme a verification report must be prepared, and approved in writing by the Local Planning Authority.
- 6 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015 and LP26 of the Submitted Local Plan 2018.
- 7 No development shall take place until a scheme to dispose of surface water has been submitted to and approved in writing by the Local Planning Authority. The scheme(s) shall be implemented prior to first use of the hereby approved development.
- 7 Reason: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015 and LP22 and LP25 of the Submitted Local Plan 2018. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted and the details need to be agreed before construction begins.
- 8 Prior to first occupation or commencement of use a full schedule of all soft landscape works shall be submitted to and approved in writing by the Local Planning Authority. The schedule shall include, planting plans, a written specification; schedules of plants noting

species, plant sizes, proposed numbers/densities; and a detailed implementation programme. It shall also indicate all existing trees and hedgerows on the land and details of any to be retained. The works shall be carried out in accordance with the approved details prior to the end of the first planting season following occupation of the development. If within a period of ten years from the date of the planting, or replacement planting, any tree or plant is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

- 8 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 and LP22 of the Submitted Local Plan 2018.
- 9 No above ground construction on the lorry park shall take place until full details of hard landscape works have been submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme agreed with the Local Planning Authority.
- 9 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 and LP22 of the Submitted Local Plan 2018. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 10 Prior to any work commencing on the site a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the Local Planning Authority regarding mitigation measures for noise, dust and lighting during the construction phase. These shall include, but not be limited to, other aspects such as access points for deliveries and site vehicles, and proposed phasing/timescales of development etc. The CEMP shall be adhered to at all times during all phases.
- 10 Reason: In the interests of highway safety, in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015 and LP17 of the Submitted Local Plan 2018. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 11 Prior to occupation a scheme of biodiversity improvements shall be submitted to and agreed in writing with the Local Planning Authority. The biodiversity improvements shall be installed prior to the first occupation of the hereby approved development and thereafter maintained in perpetuity.
- 11 Reason: To protect and enhance species in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015 and LP28, LP22 and LP30 of the Submitted Local Plan 2018.
- 12 No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority (this will not include the land for the extension to the existing building).

- 12 Reason: To ensure that any archaeological remains are suitably recorded in accordance with policy ENV14 of the East Cambridgeshire Local Plan 2015 and LP27 of the Submitted Local Plan 2018. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 13 The existing earth bund as modified by this permission and the proposed earth bund (as shown on drawings 17088 TURN 11 Rev 1 sheets 1-3) shall be completed prior to any works above ground and thereafter maintained in perpetuity.
- 13 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 and LP22 of the Submitted Local Plan 2018. This is required in the Environmental Statement in order to prevent the combined significant harm to the visual character of the area when travelling south along the A142.
- 14 No development shall commence until a scheme has been submitted to and approved in writing by the Local Planning Authority that will convert existing chilled storage area on site to frozen goods only. The area to be converted shall be completed prior to first use of the approved extension and thereafter maintained in perpetuity.
- 14 Reason: In the interests of highway safety and capacity, in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015 and LP17 of the Submitted Local Plan 2018. This is required in the Environmental Statement in order to prevent the combined significant harm to the highway network. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 15 Piling or any other foundation designs and investigation boreholes using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details
- 15 Reason: To protect water quality, in accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015 and LP22 and LP25 of the Submitted Local Plan 2018.
- 16 The materials to be used in the construction of the external surfaces, shall be as specified on the submitted application forms and approved plans. All works shall be carried out in accordance with the approved details.
- 16 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 and LP22 of the Submitted Local Plan 2018.
- 17 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any order amending, revoking or re-enacting that Order), no hard landscaping shall be created within the site, without the prior written consent of the Local Planning Authority.

- 17 Reason: To ensure that any archaeological remains are suitably recorded in accordance with policy ENV14 of the East Cambridgeshire Local Plan 2015 and LP27 of the Submitted Local Plan 2018.