

THE LAND PLANNING AND DEVELOPMENT (GUERNSEY) LAW, 2005

AND SECTION 19 OF THE LAND PLANNING AND DEVELOPMENT (GENERAL PROVISIONS) ORDINANCE, 2007

NOTIFICATION OF REFUSAL OF PLANNING PERMISSION

PROPOSALS: Erect dwelling with associated works and create vehicle access to north boundary.

LOCATION: Treehouse, Land Adjacent to, Rue Des Monts, St. Sampson.

APPLICANT: Mr & Mrs A C Tourtel

I refer to the application referred to below received as valid on 27/10/2023 regarding the above proposals as described more fully in the application and drawings referred to below.

Date of refusal of permission: 15/02/2024

Drawing Nos: A7 Design Ltd - 19-1085-P1 PD/01 & PD/02.

Application Ref: FULL/2023/2078

Property Ref: B00575C000

The Development & Planning Authority has decided to refuse your application under the provisions of section 16 of the Land Planning and Development (Guernsey) Law, 2005 for the following reasons:-

1. The application does not demonstrate that the scheme has considered all aspects of the biodiversity interest of the Area of Biodiversity Importance (ABI) from the design and development process through to protection, enhancement and mitigation.

The scheme does not consider the ecological value of trees on the site or the potential the site itself may have a varied ecological value. By virtue of the fact the ecological value across the site has not been clearly established the application does not demonstrate that the dwelling has been appropriately situated to protect the existing biodiversity of the ABI nor that the proposed biodiversity enhancement measures would be appropriate in this location. The proposal would therefore have a detrimental impact on the biodiversity interest of this Area of Biodiversity Importance.

Furthermore, the scheme does not address the biodiversity impact of the building beyond the site boundary nor does it assess or propose to mitigate against the ongoing impacts of the development within the Area of Biodiversity Importance (within and beyond the site boundary) which could reduce its ecological value.

The scheme is therefore contrary to Policies GP3, GP15 b. and, by extension MC2, of the Island Development Plan.

OTHER REMARKS:-

Right of appeal against planning decisions

Your attention is drawn to the provisions of Section 68(1) of the Land Planning and Development (Guernsey) Law 2005, which provides a right of appeal, against a decision to refuse an application for planning permission or outline planning permission to the Planning Tribunal on the merits. An appeal to the Planning Tribunal under section 68 of the Law against this decision must be made before the expiry of the period of six months beginning with the date on which the Authority made this decision.

Copy of representations made

In reaching this decision the Development & Planning Authority took into account any written consultations made under Section 11(1) of the Land Planning and Development (General Provisions) Ordinance, 2007 ('the Ordinance'). A copy of any consultation responses made to the Authority under section 11 will be included with this decision in accordance with section 19 of the Ordinance.

A J ROWLES

Director of Planning
Planning Service



PLANNING APPLICATION REPORT

Application No: FULL/2023/2078
Property Ref: B00575C000
Valid date: 27/10/2023
Location: Treehouse Land Adjacent to Rue Des Monts St. Sampson
Guernsey GY2 4HR
Proposal: Erect dwelling with associated works and create vehicle access
to north boundary.
Applicant: Mr & Mrs A C Tourtel

RECOMMENDATION - Refusal with Reasons:

REASONS FOR REFUSAL

1. The application does not demonstrate that the scheme has considered all aspects of the biodiversity interest of the Area of Biodiversity Importance (ABI) from the design and development process through to protection, enhancement and mitigation.

The scheme does not consider the ecological value of trees on the site or the potential the site itself may have a varied ecological value. By virtue of the fact the ecological value across the site has not been clearly established the application does not demonstrate that the dwelling has been appropriately situated to protect the existing biodiversity of the ABI nor that the proposed biodiversity enhancement measures would be appropriate in this location. The proposal would therefore have a detrimental impact on the biodiversity interest of this Area of Biodiversity Importance.

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The scheme is therefore contrary to Policies GP3, GP15 b. and, by extension MC2, of the Island Development Plan.

OFFICER'S REPORT

Site Description:

The site is currently open and undeveloped, situated to the west of Rue Des Monts where the roadside boundary is marked by a high granite wall. A number of trees sit immediately inside this roadside boundary. The southern boundary is marked, in part, by a hedge but otherwise offers open views to the neighbouring dwelling, L'Etoile and its conservatory. The garden of this neighbouring property is situated at a higher level

than the house. A dwarf wall is present on the site which is akin to a glasshouse wall although there is no evidence from aerial photography that such a structure was present on the land. Various other trees are present towards the western end of this 'L' shape site.

The north site boundary is marked by a green mesh fence and newly planted hedge, separating it from the neighbouring development site (see relevant history below). Beyond this to the north is a lane, Waters Rocques and further residential development. Residential properties, Bright Beginnings and the College of Further Education (School of Popular Music) are situated to the east of Rue Des Monts with further residential development to the west and south of the site.

The site is located in a Main Centre Outer Area, Conservation Area and Area of Biodiversity Importance as designated in the Island Development Plan.

Within Annex V: Landscape Character the site falls within a lowlands landscape, Lowland Hills (Northern Hougues and Lowland Escarpment).

Relevant History:

Pre-application advice has been sought relating to the development of the land for residential purposes.

FULL/2022/1906 – the erection of two, three-storey detached dwellings, one at the front and one at the rear of the site. Land to the south of the dwellings is identified as being outside the proposed domestic gardens offering a wildlife area, part of the ABI (a permanent meadow approx. 180 sqm in size).

Existing Use(s):

28 Agriculture

Brief Description of Development:

The application relates to the erection of a detached dwelling on the land.

The Treehouse is approximately 6m in height (approximate height of a one and a half-storey building) with a timber clad exterior and flat, green roof proposed. The building is to be elevated on stilts with all accommodation on a single level. Below the first floor living accommodation is a void to be used, in part, as a car port. Large areas of glazing are proposed to the south, west and east elevations with more limited fenestration to the north. The property would contain an open plan living, kitchen and dining area to the western end, storage cupboard and utility room in the centre of the building along with a bedroom and shower room. A master suite is proposed to the eastern end of the building incorporating an inverted terrace.

Vehicular access would be via the north boundary from Waters Rocques with a hoggin driveway proposed. The application form states that two off-road parking spaces are to

be provided. The 3D visuals show undercroft parking but there is no indication of this from the application drawings themselves, nor that the area will be used for domestic storage/cycle store.

An area of 100 sqm to the south of the proposed dwelling, currently within the residential curtilage of the property to the south, is proposed to be given over to the ABI application site. A tree condition survey has been undertaken and the report forms part of the application submission. A Biodiversity Recommendation Report has also been provided. The covering letter from the planning agent addresses the matter of sustainable development having regard to Policy GP9.

Relevant Policies of any Plan, Subject Plan or Local Planning Brief:

MC2: Housing in Main Centres and Main Centre Outer Areas

GP1: Landscape Character and Open Land

GP3: Areas of Biodiversity Importance

GP8: Design

GP9: Sustainable Development

GP15: Creation and Extension of Curtilage

IP6: Transport Infrastructure and Support Facilities

IP7: Private and Communal Car Parking

IP9: Highway Safety, Accessibility and Capacity

Representations:

Four letters of representation including two letters on behalf of the owner of the neighbouring development site have been submitted objecting to the application and raising the following points:

- Overshadowing to the approved dwellings to the north
- Overlooking to the approved dwellings to the north and to other properties due to its elevated design
- Outlook from surrounding properties will be adversely affected along with views from these properties
- The scheme does not represent efficient and effective use of land
- The design and appearance of the property is out of keeping in the locality, it would harm the character of the area and does not comply with the IDP
- The stilts design does not represent good, accessible design nor does the scheme demonstrate how the space will be flexible and adaptable
- There is no specification relating to ongoing health or future maintenance of the site or green built form
 - Biodiversity will be destroyed. The loss of trees from with an ABI would justify refusal – over 12% of the whole ABI would be occupied, this site should remain free of sporadic development
- There will be noise, disruption and other pollution (from this and the adjoining site)
- The removal of trees from the site has not been justified

- Trees to be retained cause danger to adjoining property – overhanging the boundary, blocking gutters and falling branches
- The submission documents do not address all relevant planning policies and the 3D visuals are misleading – e.g. parking and access arrangements
- The impact of foundations on natural streams and German tunnels in the area, and by extension causing damage to surrounding properties

La Societe Guernesiaise comment as follows:

1. We would highlight that the tree report only considers trees in terms of their amenity and landscape value and their physical characteristics; it does not consider ecological value. Such reports can be dismissive of trees deemed imperfect when in fact, the majority of trees exhibit features which might be deemed imperfections but they host a range of biodiversity regardless. Also, as the map accompanying the tree report was not provided, it has not been possible to identify which trees are proposed to be retained or felled.
2. The Biodiversity Review contains a number of inaccuracies, for example -
 - a. our local ivy is Atlantic Ivy (*Hedera hibernica*), rather than Common Ivy (*H. helix*)
 - b. our local hawthorn is Common Hawthorn (*Crataegus monogyna*), not Midland Hawthorn (*C. laevigata*)
 - c. Waxwing is a scarce winter visitor (recorded roughly every 10-15 years and decreasing) so will not be supported by planting Dog Rose locally.
 - d. White Admiral butterfly has never been recorded in the island.
3. The height of the proposed development is not sufficiently tall to host breeding Swifts so we would not recommend installing boxes for this species. Boxes for other bird species or bats could be substituted.
4. We do not believe a meadow habitat in the dry shade of the cypress tree would be successful.
5. We would highlight that the cypress, as a non-native species, is of limited ecological value, although we accept that it has some landscape value and provides some screening. We would suggest felling the tree (outside of the bird breeding season) and offsetting the loss with ample planting of suitable native species elsewhere on the site, for example along the roadside boundary.
6. The proposal to build the dwelling on stilts cannot be claimed to retain any significant habitat underneath as the conditions would be too dry and heavily shaded, and a significant proportion of the area would be used as a car port. It seems obvious that the stilts are simply a mechanism to provide improved panoramic views. Of course, they would also make the building more visible to the surrounding area.
7. The additional 100sqm of land 'donated' to the ABI is a welcome proposal but it would contribute little to the ecology of the designation if it was merely amenity lawn. We would suggest that this additional land should be of a comparable extent to the footprint of the proposed development and should host a biodiverse habitat in order to offset some of the habitat loss.
8. There is insufficient detail regarding remedial planting in order to determine if these are native and of appropriate species.

9. The new development would result in environmental impacts beyond just habitat loss. In particular, there would be new permanent sources of noise and visual disturbance and also light pollution. As such there would be detrimental effects across the entire property and beyond the site boundary into other parts of the ABI designation. We therefore disagree with the conclusion of the Biodiversity Review which states that 'the development will be low impact within and surrounding the ABI [sic]'.

In considering the proposals in the context of the policies of the IDP, we do not believe the requirements of Policy GP3 have been met, in particular -

Point b. the biodiversity interest of the area has been protected and where possible enhanced or,

Point c. any negative impacts can be appropriately and proportionately mitigated in accordance with a scheme to be approved by the Authority.

In summary, the proposals do not consider all of the environmental impacts associated with the development, either in the short or long term and the stated mitigation measures are not sufficient to address those impacts.

Consultations:

The States Archaeologist – does not raise any concerns.

Agriculture, Countryside and Land Management Services – note that the proposed development is sited within the Delancey Lane Area of Biodiversity Importance (ABI) having been designated in 2016 under the Island Development Plan (IDP). It was proposed for designation in the IDP due to its designation as a Site of Nature Conservation Importance (SNCI) in the Urban Area Plan.

Following review of ABIs in 2019, the site was considered to be of sufficient biodiversity importance that it was recommended for retention. We welcome the consideration of impacts to the ABI in the design phase of this development which has sought to reduce those impacts (such as the screening of the retained area of ABI during construction) and mitigate residual impacts (e.g. through installation of green roof, wildflower meadow and bird and bat boxes). There are, however, aspects of the site's biodiversity which have not been sufficiently considered at this early stage in the development.

For example,

1. Neither the tree condition survey (Lloyd, 2020) nor the Biodiversity review (Dovey, 2021) have considered the ecological value of the trees on site (the tree survey only having considered the 'condition and form' of the tree).
2. No assessment has been made of varying ecological value across the site. Following assessment of aerial photography of the site, it appears that the western section has been left undisturbed for a longer period of time than the eastern section of the site, which was grassland before the 1990 photography and has more recently had vegetation cleared (Environment Guernsey, 2020). This may indicate that the western portion is of higher ecological value (being more mature woodland). Such an assessment is beneficial as it should be used to inform the siting of the development within the site

(e.g. it can highlight areas or features of higher ecological value which should be prioritised for retention).

A number of recommendations made within the Biodiversity review (Dovey, 2021) have been incorporated into the design of the proposed development, including the installation of a green roof, installation of bird and bat boxes, and creation of a permanent 'wildflower meadow'. Many of the recommendations proposed related to wildlife retention or enhancement are unlikely to be successful, namely:

- The creation of a 'wildflower meadow' beneath a Monterey cypress is unlikely to establish. As an evergreen tree it will provide year-round shade, reducing light levels to the ground beneath it and preventing any 'wildflowers' from growing. Furthermore, if the sowing of the 'wildflower meadow' requires cultivation of the ground beneath the tree (e.g., rotovation) this is likely to cause damage to the tree's roots, as well as degrading the condition of the soil.
- The inclusion of 'stilts' within the development is described as being intended to "*retaining the flora and ground conditions below the new dwelling*" (cover letter, A7 Design). This will not be successful due to the shade from the property which will prevent any plants from surviving. A large area under the dwelling also appears to be purposed for use as a car port, which will likely require hard standing to prevent erosion of the ground, thereby further reducing the ecological value.
- Swift boxes need to be placed at under the eaves of a building and at least 5m off the ground, it may not be possible to install a swift box to these parameters on the proposed dwelling and so the boxes are unlikely to be utilised by breeding swifts.

The application does not assess or attempt to mitigate any of the ongoing impacts of the development's presence within the ABI. For example, light pollution, noise pollution and visual disturbance are likely impacts which have the potential to reduce the ecological value of the retained ABI surrounding the proposed new development.

We note that designation of an ABI is not intended to prevent development (IDP, 2016) however, given the above comments, we do not believe that the tests of policy GP3 have been met by the application, namely that:

- a) proposals demonstrate that the biodiversity interest of the site has been considered and taken into account as part of the design and development process; and,
- b) the biodiversity interest of the area has been protected and, where possible, enhanced; or,
- c) any negative impacts can be appropriately and proportionately mitigated in accordance with a scheme to be approved by the Authority.

Summary of Issues:

The key issues in this case relate to the effect of the proposal on the Area of Biodiversity Importance, the design and appearance of the dwelling and its impact on residential amenity.

Assessment against:

1 - Purposes of the law.

The objectives set out in Section 1(2) of The Land Planning and Development (Guernsey) Law, 2005, 'the Law', have been considered and this report forms part of the assessment, with policy issues set out in Section 2 below.

2 - Relevant policies of any Plan, Subject Plan or Local Planning Brief.

The IDP supports new housing development in Main Centre Outer Areas such as this subject to a proposal meeting the aims of all other relevant policies in the IDP. Policy MC2 seeks to address the matter of mix and types of dwellings and the IDP also seeks to make efficient and effective use of land.

It is also reasonable for a dwelling to be served by domestic curtilage/garden. This application does not differentiate on the application drawings between retained ABI land outside curtilage and the proposed domestic garden associated with the property therefore, although the covering letter refers to protecting ABI land from domestic activity, the application is assessed on the basis that all the land outlined in red would fall within the proposed domestic garden for The Treehouse.

The matter of landscape character is assessed in more detail elsewhere in this report as is the matter of the impact of the development on the Area of Biodiversity Importance (ABI). As the site does not fall within an Agriculture Priority Area this aspect of Policy GP15 is not relevant and nor would the scheme result in the unacceptable loss of established boundary features. The change of use of land alone would not result in unacceptable harm to the amenities of neighbouring residents.

Area of Biodiversity Importance (ABI)

Development within an Area of Biodiversity Importance (ABI) is not precluded by the IDP. There are however, specific policy criteria that must be addressed in order for a scheme to satisfy the aims of this policy in terms of biodiversity interest:

- a) biodiversity interest considered and taken into account as part of the design/development process; and
 - b) biodiversity interest has been protected, or enhanced (where possible); or
 - c) negative impacts can be mitigated.
- a) It is acknowledged that consideration has been given to potential impacts on the ABI in the design phase of the proposed development including screening of retained areas of the ABI during construction and mitigation but in other areas the biodiversity of the site has not been sufficiently considered through the development process (long and short term). Various matters have not been fully explored through the design and development process and these include but are not limited to, the impact of the building on the ABI beyond the site boundaries, that

there is no annotation or detail contained within the application to differentiate between the retained ABI land that is not to be used as domestic garden (due to the proposed south facing garden) and proposed domestic garden/curtilage, the fact that the ecological value of the trees on site has not been assessed nor that ecological value across the site will be varied and the Cypress tree is non-native when assessing its ecological value in the ABI. If the western portion of the site is concluded to be of higher ecological value (being more mature woodland) this would usually be prioritised for retention and without such an assessment it cannot be established that the dwelling and proposed parking area are appropriately positioned.

In this regard therefore, the scheme does not satisfactorily address criterion a).

- b) As the possible varied ecological value of the site has not been established the scheme fails to demonstrate that the development is appropriately situated in order to protect the existing biodiversity on site.

Recommendations from the Biodiversity Recommendation Report seek to enhance biodiversity interest on the site however there is doubt over the success of elements proposed and some recommendations are not relevant to the Guernsey setting.

A wildflower meadow under the canopy of a Monterey Cypress with year-round shade, the cultivation of ground to sow such a meadow would likely cause damage to tree roots and degrade the condition of the soil all of which would neither protect nor enhance the biodiversity interest.

The design of the dwelling, on stilts, would not, as suggested, retain “flora and ground conditions below the new dwelling” due to the shading caused. Furthermore, an area below the dwelling may be used as a car port and although not clearly set out in the submission would likely result in the introduction of hardstanding (to manage erosion of the ground). Based on the shading caused by the dwelling the introduction of hardstanding below the building is unlikely to further adversely affect biodiversity however, the active use of the area for parking cars would be likely to reduce the ecological value of this part of the site thereby neither protecting nor enhancing biodiversity interest on the site.

Although swift boxes are proposed these are unlikely to be utilised by breeding swifts in this particular case and would not therefore, offer an enhancement to biodiversity interest. Nonetheless, in relation to bird and bat boxes it would be possible to explore other alternatives to offer an enhancement in this respect.

Overall however, criterion b. of Policy GP3 is not satisfied.

It is noted that either criterion b. or c. of Policy GP3 should be satisfied however in this case both have been assessed.

- c) The submission does not assess or attempt to mitigate any of the ongoing impacts of the development's presence within the ABI (not just within the site boundary) which

would likely include light pollution, noise pollution and visual disturbance. These all have the potential to reduce the ecological value of the retained ABI surrounding the proposed new development. Although an additional area of land is to be brought within the site it would not, as lawn, have a positive ecological value that would contribute towards the ABI. Furthermore, as outlined above, a number of perceived measures to protect or enhance the biodiversity interest of the site would also result in negative impacts and the scheme does not seek to mitigate against these effects. The scheme fails therefore to address criterion c.

Although comments have been received relating to a lack of clarity relating to proposed species, if the scheme were acceptable in all other respects the matter could be managed by planning condition.

The proposal therefore fails to meet all requirements of Policy GP3, criterion b. of Policy GP15 and Policy MC2 of the IDP

Implications of *The Island Development Committee v Portholme* [2002]

In *The Island Development Committee v Portholme* [2002], the Court of Appeal held that “... if a plan allows for development only in certain identified circumstances, by necessary inference, development out with those circumstances is not to be allowed.”

Section 12(1) of The Land Planning and Development (General Provisions) Ordinance, 2007, is also clear that where the Authority has regard to any relevant Plan in determining an application for planning permission for development which would involve a departure from such a Plan then it must refuse the application (unless the applicant has requested that the application be considered as a minor departure), and it need not take into account any other matter to which it is required to have regard under the Law.

Given the identified conflict with Policies GP3, GP15 b. and MC2, the only lawful decision that can be reached is that planning permission be refused.

Other Matters

Other matters are nevertheless considered below for completeness.

Design, form, scale and massing of the proposed development

The Island Development Plan must balance public interest and individual choice but should protect and where possible enhance the built and natural environment. Flexibility of design allows proposals to address sustainable design, climate change and flexible/adaptable accommodation having regard to personal choice whilst respecting, but not necessarily replicating, the character of the area.

Notwithstanding this however, efficient and effective use of land must be considered to make best use of the finite land resource. Multi-storey buildings represent a more efficient use of land than single storey buildings (as set out in the Strategic Land Use

Plan (SLUP)) although it is acknowledged that there may be overriding reasons why a multi-storey design approach may not be acceptable in some instances. A single-storey dwelling does not represent the most efficient and effective use of land and although in this case the primary issue with the application relates to the impact on the ABI it has nevertheless not been demonstrated that the scheme represents the most effective and efficient use of land.

The proposed flat roof dwelling represents a contemporary building and overall the development and palette of materials proposed represents a good standard of design in accordance with the aims of Policies GP8 of the Island Development Plan. A green roof is proposed to help assimilate the development with its surroundings and bring biodiversity benefits. The biodiversity benefits will depend on various factors which can be difficult to achieve in perpetuity so their contribution to the overall biodiversity provision of the scheme must be weighted accordingly although specification and maintenance conditions can be imposed. In this regard the scheme accords with criterion a. good design and e. soft landscaping that mitigates the impacts of the development and contributes more to sustainable design.

There is some suggestion (3D visuals) of undercroft parking below the building which could either lead to soil erosion or the introduction of hardstanding although, exemption rights relating to hardstanding could be removed in order to manage hardstanding beyond that shown on the application drawings. This would not alter the fact that flora and ground conditions will not be retained below the Treehouse stilts.

Impact on neighbour amenity and the living environment of future occupiers

In this case consideration must be given to the impact of the development on existing residential neighbours and the potential impact of the scheme on the amenities of occupiers of the two, three-storey dwellings approved to the immediate north of the site.

The Treehouse would not result in overshadowing of existing/approved adjoining properties detrimental to the amenities of the occupiers of those properties. An element of overshadowing would occur to the retained ABI wildlife corridor land to the immediate south of Unit 1 (addressed above). Given the distance separation, existing boundary treatments and the position of proposed fenestration the scheme will not result in unacceptable overlooking or loss of privacy to the occupiers of existing surrounding dwellings.

With regard to the adjoining approved development, privacy and mutual overlooking would remain within acceptable limits in many respects, subject to appropriate conditions relating to obscure glazing e.g. north elevation. There would be scope for overlooking from the northern walkway. If the scheme were acceptable in all other respects the scheme could be deferred in order to seek revisions that may omit the northern external walkway to the terrace area or means by which this could be enclosed to direct views away from approved Unit 1.

With regard to the impact on approved Unit 2, The Treehouse would be approximately 17m away with only oblique views from the proposed bedroom inverted terrace would be possible but the perception of overlooking would and impact on the amenities of occupiers of approved Unit 2.

A hedge is shown to enclose the proposed garden south of The Treehouse in order to mitigate impacts on the users of the conservatory and garden of the neighbouring dwelling. This matter could be managed by planning condition and other means of enclosing this particular boundary could also be explored in order to manage privacy between The Treehouse and L'Etoile.

The proposed dwelling would be served by good levels of sunlight and daylight along with good internal space provision, aspect and outlook. The accommodation would be accessible and flexible in order to address the requirements of Policy GP8. The level of external amenity space combined with the fact the site is within walking distance of Delancey Park, access to external open space is considered satisfactory in this instance. It is noted that the proposed garden to the east of The Treehouse would be overlooked by Unit 2, but this alone would not warrant the refusal of permission.

Vehicular access, parking and cycle parking

The proposed access would not have an unacceptable impact on the character of the locality nor will vehicle movements associated with a single dwelling have an unacceptable impact on highway safety. The level of parking provision (two vehicles as specified on the application form) would accord with the IDP and SPG.

The scheme does not appear to make specific provision for secure and covered cycle storage to address the aims of IP6. Ordinarily exemption rights would allow for the erection of a shed within the domestic garden area of a property however, in this case the extent of domestic garden is unclear and consideration would need to be given, at this stage, to the impact of such a development on the ABI. As submitted the scheme does not satisfactorily address Policy IP6.

3 - General material considerations set out in the General Provisions Ordinance.

In addition to the consideration of policy issues, Section 13 of the Land Planning and Development (General Provisions) Ordinance, 2007 identifies other material planning considerations which could be relevant; however, having regard to the Guernsey Court of Appeal judgement in *The Island Development Committee v Portholme* [2002] (Civil 320) these have been given limited further consideration in this case.

4 - Additional considerations (for protected trees, monuments, buildings and/or SSS's).

The proposal would have no adverse impact on protected trees, buildings or sites.

Date: 15/02/2024

