

Report to: Planning Committee
Date: 20th August 2024
Application No: 240166
Location: Land to the Rear of Durham Court, Rockhurst Drive, Eastbourne, BN20 8UT
Proposal: Demolition of existing garages and erection of 2no. two-bedroom dwellings and 2no three-bedroom dwellings along with associated landscaping and parking (amended scheme received 02 July 2024)
Applicant: Mr D Ashford
Ward: Ratton
Recommendation: Grant planning permission with conditions.
Contact Officer: **Name:** Chloe Timm
E-mail: Chloe.Timm@lewes-eastbourne.gov.uk

IMPORTANT NOTE: This scheme is CIL Liable.

Site Location Plan



1.	Executive Summary
1.1	This application is presented to the Planning Committee due to the significant number of objections received in relation to the proposed scheme. Members are advised that the number of objections is not a material consideration in the determination of planning applications but does have a bearing upon the requirement for consideration by the Planning Committee.
1.2	The application seeks planning permission for the erection of 4no terraced dwellings, this would include the demolition of an existing single storey garage block and clearance of an area of soft landscaping.
1.3	The proposal would provide 7no off road parking spaces, cycle storage for each dwelling within the rear gardens and a dedicated refuse store to the front of the terrace.
1.4	It is considered that the design, scale and layout of the development sympathetic towards neighbouring sites and, as such, the development would not generate any unacceptable overbearing, overlooking or overshadowing impact.
1.5	Overall, it is considered that the proposed development would not result in any harm of a significance that would outweigh the benefit of a net gain of four dwellings which would contribute towards the Council's housing delivery targets and address identified housing need within the Borough.

2.	Relevant Planning Policies
2.1	<p><u>National Planning Policy Framework:</u></p> <ul style="list-style-type: none"> 2. Achieving sustainable development 5. Delivering a sufficient supply of homes 8. Promoting healthy and safe communities 9. Promoting sustainable transport 11. Making effective use of land 12. Achieving well-designed places 14. Meeting the challenge of climate change, flooding and coastal change 15. Conserving and enhancing the natural environment.
2.2	<p><u>Eastbourne Core Strategy 2006-2027:</u></p> <ul style="list-style-type: none"> B1: Spatial Development Strategy and Distribution B2: Creating Sustainable Neighbourhoods

	<p>C4: Old Town Neighbourhood Policy</p> <p>D1: Sustainable Development</p> <p>D5: Housing</p> <p>D8: Sustainable Travel</p> <p>D9: Natural Environment</p> <p>D10a: Design.</p>
2.3	<p><u>Saved polices of the Eastbourne Borough Plan 2001-2011:</u></p> <p>HO1: Residential Development within the Existing Built-up Area</p> <p>HO2: Predominantly Residential Areas</p> <p>HO7: Redevelopment</p> <p>HO8: Redevelopment of Garage Courts</p> <p>HO20: Residential Amenity</p> <p>NE4: Sustainable Drainage Systems</p> <p>NE7: Waste Minimisation Measures in Residential Areas</p> <p>NE18: Noise</p> <p>NE23: Nature Conservation of Other Sites</p> <p>NE28: Environmental Amenity</p> <p>UHT1: Design of New Development</p> <p>UHT4: Visual Amenity</p> <p>UHT7: Landscaping</p> <p>TR6: Facilities for Cyclists</p> <p>TR11: Car Parking.</p>
2.4	<p><u>Supplementary Planning Documents and other relevant guidance:</u></p> <p>Sustainable Building Design SPD</p> <p>Trees and Development SPG</p> <p>Sustainability in Development</p> <p>Eastbourne Affordable Housing SPD</p> <p>EBC Sustainability in Development TAN</p> <p>EBC Biodiversity Net Gain TAN</p> <p>EBC Electric Vehicle Charging Points TAN.</p>

3.	Site Description
3.1	The application site forms a plot of land located to the rear (east) of Durham Court, Rockhurst Drive.

3.2	The site currently has a single storey flat roof block of 6no garages and an area of soft landscaping surrounding. The site has been partially cleared prior to the submission of the planning application.
3.3	The site is accessed via the private access road to Orkney Court to the south.
3.4	<u>Site Constraints:</u> Predominantly Residential Area Eastbourne Borough Council Covenant.

4.	Proposed Development
4.1	The application site seeks permission for the erection of a terrace of 4no two-storey dwellings with associated parking, cycle parking and refuse/recycling storage.
4.2	The development would be comprised of 2no two-bedroom and 2no three-bedroom dwellings, with the provision of off road parking for 7no cars within an area in front of the proposed dwellings.

5.	Relevant Planning History:
5.1	No Relevant Planning History.

6.	Consultations:
6.1	<u>CIL Officer:</u> I can confirm this application is liable for CIL. Please ask your clients to contact us directly and fill in all necessary CIL forms prior to starting ANY works on site.
6.2	<u>Arboriculture Officer:</u> I have reviewed the provided Arboricultural Impact assessment plan, Arboricultural method statement & Tree protection plan. I am satisfied that these documents have successfully identified those trees with the potential to be affected by this development, provided measures for their protection and a means of ongoing arboricultural monitoring.
6.3	<u>East Sussex Highways:</u> This application originally attracted highway objection due to insufficient on- site parking provision. An amended scheme for 4 X 3- bedroom dwellings has been submitted with 7 parking spaces. The ESCC Parking Demand Calculator would suggest 9 spaces are required for the development based on 2 allocated spaces per dwelling or 7 spaces based on 1 allocated space. Based on the fact the site is served from a private road, an objection on the shortfall of 2 spaces would be difficult to justify as any overspill parking would be unlikely to affect the highway.

	<p>Furthermore, the site does have relatively good bus and amenity access and wouldn't be totally reliant on private car use. The highway objection is therefore withdrawn subject to the following conditions included with any grant of consent:</p> <p>1. The development shall not be occupied until the parking area has been provided in accordance with plan no: 03 Rev D which has been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the area shall thereafter be retained for that use.</p> <p>Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.</p> <p>2. The proposed parking spaces shall measure at least 2.5m by 5m (add an extra 50cm where spaces abut walls or fences).</p> <p>Reason: To provide adequate space for the parking of vehicles and to ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.</p> <p>3. The development shall not be occupied until cycle parking has been provided in accordance with the approved plans which have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the area[s] shall thereafter be retained for that use.</p> <p>Reason: In order that the development site is accessible by non-car modes and to meet the objectives of sustainable development.</p>
--	---

7.	Other Representations:
7.1	<p><u>Notification</u></p> <p>Notification of this application has been undertaken in the form of:</p> <ul style="list-style-type: none"> a. neighbour notification letters; and b. site notices displayed in roads neighbouring the site.
7.2	<p><u>Neighbour Representations:</u></p> <p>19 letters of objection have been received on the original scheme proposed (5no two-bedroom dwellings),</p> <p>17 objections to the first revision (2no two-bedroom and 2no three-bedroom dwellings), and</p> <p>7no objections to the second revision recommended for approval (2no two-bedroom and 2no three-bedroom dwellings with an amended layout).</p>

	<p>Objections raise the following concerns based upon material planning grounds:</p> <ul style="list-style-type: none"> • Parking • Highway safety • Impact on ecology • Loss of Trees • Loss of green space • Disturbance during construction works • Impacts to Privacy • Over development of the site. <p>Non-planning considerations raised:</p> <ul style="list-style-type: none"> • Loss of view • Antisocial behaviour • Property value.
--	--

8.	Appraisal:
8.1	<p><u>Key Considerations:</u></p> <p>In assessing the application, it is considered that planning policy, residential amenity, visual impact and highway safety are the key issues that require considering in the application assessment.</p>
8.2	<p><u>Principle:</u></p> <p>The NPPF requires local planning authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of housing. As of October 2023, Eastbourne is only able to demonstrate a 1.4-year supply of housing land, meaning that Eastbourne cannot demonstrate a five-year housing land supply. National policy and case law has shown that the demonstration of a five-year supply is a key material consideration when determining housing applications and appeals. It also states that where relevant policies are out-of-date, permission should be granted <i>“unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole”</i>, (NPPF, paragraph 11). This approach, commonly referred to as applying a 'tilted balance' will be adopted in assessing the planning application.</p> <p>The National Planning Policy Framework (NPPF) supports residential development in sustainable locations, particularly where it can support local housing need. It states that housing applications should be</p>

	<p>considered in the context of the presumption in favour of sustainable development, unless other material considerations make the prevent this.</p> <p>This is reinforced within the Local Development Framework, with one of the key primary development principles being to provide at least 60% of new residential development within the existing built-up area in well-designed schemes that make efficient use of urban land.</p> <p>The saved policies of the Eastbourne Borough Plan include a specific policy, HO8, to encourage the redevelopment of garage plots for residential purposes where a submitted scheme represents:-</p> <ul style="list-style-type: none"> - a well designed development in terms of siting, scale and materials; - no significant harm to residential, visual or environmental amenity; - no adverse effect on road safety; - provision of adequate car parking; <p>The redevelopment of such sites is also encouraged by para. 124 d) of the Revised National Planning Policy Framework. As such, it is considered the redevelopment of the garage site is acceptable in principle subject to these criteria, against which the development will be fully assessed in the main body of this report.</p>
8.3	<p><u>Design, Character and Impact Upon Landscape:</u></p> <p>Relevant policy: Policy D10a (Design) of the Eastbourne Core Strategy 2013, saved policies UHT1 (Design of New Development) and UHT4 (Visual Amenity) of the Eastbourne Borough Plan 2003 and paragraphs 8 and 130 of the NPPF.</p> <p>Whilst the immediate street scene is comprised of purpose-built blocks of flats the proposed terrace of dwellings would not be out of keeping with the residential setting and will therefore not have a harmful impact on the visual amenity of the area.</p> <p>The dwellings would be an improvement to the flat roof garage block that currently exists on site and the palette of materials to be used will be in keeping with the buildings surrounding with the use of facing brickwork elevations and concrete tiled roof.</p>
8.4	<p><u>Living Standards for Future Occupants:</u></p> <p>Para. 123 of the Revised NPPF states that ‘planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions’. Paragraph 128 (e) requires decisions secure ‘[] well-designed, attractive and healthy places’ and Para.135 (f) seeks to ‘promote health and well-being, with a high standard of amenity for existing and future users’. Eastbourne Core Strategy Policy B2 (Creating Sustainable neighbourhoods) requires a development to “Protect the residential and environmental amenity of existing and future residents” and Eastbourne Borough Plan Policy UHT1</p>

(Design of New Development) where a development is required to 'be appropriate in [] alignment and layout'.

Para. 126 of the National Design Guide (2019), which is a companion to the Revised National Planning Policy Framework, states that 'well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation.'

The Department for Communities and Local Government has produced the technical housing standards – nationally described space standard. This document sets out minimum recommended Gross Internal Area (GIA) for new residential units, based upon number of bedrooms provided, number of storeys and number of occupants. The Local Planning Authority requires that all new residential developments comply with National Space Standards in order to provide suitable amenity space for future residents.

The nationally described space standards require that a three-bedroom, four persons two-storey dwelling provide a minimum GIA of 84m². The proposed three-bedroom dwellings will exceed 86 m². The minimum requirement for a two-bedroom, three-person dwelling is 70m², the proposed two-bedroom, three-person dwellings will meet the minimum of 70m². All dwellings will space to provide adequate storage at both ground and first floor levels. As such it is considered that the proposed unit would meet the nationally described space standards.

All habitable rooms would be served by clear glazed openings that offer unobstructed outlook and thus these rooms would have access to good levels of natural light and ventilation.

New dwellings must also have acceptable arrangements for access and amenity space. Although the local development plan does not identify minimum sizes for outdoor amenity space it is considered essential that suitable amenity facilities are provided for occupants of residential property in line with the objectives of para. 135 (f) of the Revised NPPF, which states that planning policies and decisions should ensure that developments 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users...' The site plan confirms that private amenity space is to be provided for each dwelling.

In light of the above, the proposed dwelling will provide a good level of accommodation for future occupiers.

8.5

Residential Amenity:

Relevant policy: Policy B2 (Creating Sustainable Development) of the Eastbourne Core Strategy 2013, saved policy HO20 (Residential Amenity) of the Eastbourne Borough Plan 2003 and para. 130 of the NPPF.

	<p>The dwellings proposed will not have a detrimental impact upon the amenities of occupiers that surround the site.</p> <p>Concerns have been raised relating to impact to privacy due to the proximity of the proposed terrace to the existing flats surrounding. The national design code advises a distance of 15m between proposed and existing residential windows is sufficient to protect the privacy of occupiers. The distance from Durham Court to the proposed terrace exceeds the recommended distance and will be separated by 18.3m, therefore outlook from the front elevation would be sufficiently distanced from the windows of flats within Durham Court.</p> <p>The application site is within a predominantly residential area and any noise from the development will be of a similar nature that already exists within the area.</p> <p>On balance, taking the above into consideration, the proposal will not have a significantly detrimental impact on the amenity of residential occupiers that surround the site.</p>
8.6	<p><u>Transport and Parking:</u></p> <p>Relevant policy: Policy D8 (Sustainable Travel) of the Eastbourne Core Strategy 2013 and policies TR7 and UHT1 (Design of New Development) of the Eastbourne Borough Plan 2003 and para. 110 of the NPPF.</p> <p>The application site is located in a sustainable location within short distances from local bus routes and local amenities.</p> <p>The proposal includes the provision of 7no parking spaces, the ESCC parking demand calculator suggests a requirement of 9mp spaces.</p> <p>Cycle storage will be provided within the rear garden areas of the dwellings, guidance states 1 cycle parking space per bedroom should be provided, this will be secured via planning permission.</p> <p>ESCC Highways were consulted and objected to the original scheme submitted but have since removed their objection, subject to a number of conditions and informatives.</p> <p>The location of bin stores is considered acceptable.</p>
8.7	<p><u>Flooding and Drainage:</u></p> <p>The application site falls within floods zone 1 and is not at risk of surface water flooding.</p> <p>Saved Policy US4 states that all development should make adequate provision for floodplain protection and surface water drainage, in order to ensure that:</p>

	<p>a) no overall reduction in flood storage capacity and flood waterway area occurs;</p> <p>b) measures are provided to manage increased surface water runoff to minimise the risk from flooding, whilst not increasing the risk of flooding elsewhere.</p> <p>No details of a sustainable drainage system have been submitted with this application; however, these can be sought via planning condition.</p>
8.8	<p><u>Ecology and Biodiversity:</u></p> <p>The Environment Act (2021) includes the provision to amend the Town and Country Planning Act (1990) in order to require at least 10% biodiversity net gain for all new development to be delivered as a condition of a planning permission. The Act provided a two-year transition period before this requirement came in to force on 2 April 2024 for small sites such as this one. This application was submitted during the transition period (before 2 April 2024) and therefore this requirement doesn't apply.</p> <p>The Council have adopted a Biodiversity Net Gain Technical Advice Note (TAN) to reflect the direction of travel and also provide clarification on NPPF requirements that 'planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity (para. 180) and that, when determining planning applications, local planning authorities should apply the principle that 'opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity' (para. 186). However, the TAN does not require or expect a 10% biodiversity net gain from minor developments and so doesn't apply to this application.</p> <p>The Council's Arboriculture was consulted and raised no objection to the proposal.</p> <p>A preliminary ecological assessment was submitted as part of the application and identified no protected and notable species within the site.</p> <p>Within the zone of influence were parcels of priority habitat located 260m west of the site and ancient woodland 440m south-west of the site, the report concludes due to the distances adverse impacts were unlikely.</p> <p>The appraisal identified no evidence of bats or potential roosting within the site/the existing garage structure. Trees surrounding the site will remain and it is recommended mitigation measures are put in place relating to artificial lighting to ensure a dark corridor along the western boundary, ensuring the trees are not lit.</p> <p>Multiple log and brash piles were recorded within the northern half of the site which were considered to provide sheltering and hibernating opportunities of reptiles, it is recommended precautionary method of works are implemented and as a further precaution any excavation works or</p>

	<p>actions that would impact upon potential reptile hibernation features should be carried out outside the reptile hibernation season. (April-September inclusive).</p> <p>Habitat clearance should be carried out outside of bird nesting season (March-August inclusive).</p> <p>Recommendation is also for the installation of bird and bat boxes and bee bricks.</p>
8.9	<p><u>Planning Obligations:</u></p> <p>None.</p>
8.10	<p><u>Human Rights Implications:</u></p> <p>The impacts of the proposal have been assessed as part of the application process. Consultation with the community has been undertaken and the impact on local people is set out above. The human rights considerations have been taken into account fully in balancing the planning issues; and furthermore the proposals will not result in any breach of the Equalities Act 2010.</p>
8.11	<p><u>Conclusions:</u></p> <p>The application will provide a good level of accommodation for future occupiers, will not detrimentally harm the amenity of existing residential occupiers or the visual amenity of the area. The proposal is found to be in accordance with national and local planning policies.</p>

9.	Recommendations
9.1	It is recommended the application be approved, subject to the below conditions.

10.	Conditions:
10.1	<p>Timeframe: The development hereby permitted shall be begun before the expiration of three years from the date of permission.</p> <p>Reason: To comply with Sections 91 and 92 of the Town and County Planning Act 1990 (as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).</p>
10.2	<p>Drawings: The development hereby permitted shall be carried out in accordance with the approved drawings submitted:</p> <ul style="list-style-type: none"> - Drawing: 01 Rev E – Site Location and Block Plans - Drawing: 03 Rev G – Proposed Site Layout - Drawing: 04 Rev F – Proposed Ground Floor - Drawing: 05 Rev F – Proposed First Floor - Drawing: 07 Rev D – Proposed Elevations

	<p>Reason: For the avoidance of doubt and ensure that development is carried out in accordance with the plans to which the permission relates.</p>
<p>10.3</p>	<p>DCEMP: Prior to commencement of development, including any ground and demolition works, a Demolition Construction and Environmental Management Plan (DCEMP) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved DCEMP shall be implemented and adhered to in full throughout the entire demolition/construction period. The DCEMP shall provide details as appropriate, which shall address but not be restricted to the following matters:</p> <ul style="list-style-type: none"> • sequence and schedule of demolition phases; • the anticipated number, frequency and types of vehicles used during development; • the method of access and egress and routing of vehicles during development; • parking of vehicles by site operatives and visitors; • loading and unloading of plant, materials and waste; • method of removing material from the site, including special measures for hazardous material; • times of any deliveries related to the development, which should avoid peak travel times; • photographic survey of the condition of the surrounding highway; • storage of plant and materials, • erection and maintenance of any security hoarding; • provision and operation of wheel washing facilities or any other works required to mitigate the impact of development upon the public highway (including the provision of temporary Traffic Regulation Orders); • measures to manage the impact upon local air quality; • air quality monitoring; • confirmation of no burning of materials on site; • operating hours; • anticipated timescales for completion of the works; • measures to manage flood risk during construction; and • public notification, including site notices with public contact details during the works. <p>Reason: In the interests of highway safety and the amenities of the area.</p>
<p>10.4</p>	<p>Parking Area: The development shall not be occupied until the parking area has been provided in accordance with plan no: 03 Rev G which has been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the area shall thereafter be retained for that use.</p> <p>Reason: To ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway</p>

10.5	<p>Parking Dimensions: The proposed parking spaces shall measure at least 2.5m by 5m (add an extra 50cm where spaces abut walls or fences).</p> <p>Reason: To provide adequate space for the parking of vehicles and to ensure the safety of persons and vehicles entering and leaving the access and proceeding along the highway.</p>
10.6	<p>Cycle Parking: The development shall not be occupied until cycle parking has been provided in accordance with the approved plans which have been submitted to and approved in writing by the Planning Authority in consultation with the Highway Authority and the area[s] shall thereafter be retained for that use.</p> <p>Reason: In order that the development site is accessible by non- car modes and to meet the objectives of sustainable development.</p>
10.7	<p>Refuse/Recycling: Prior to first occupation of the development, hereby approved, the enclosed refuse and recycling storage facilities shall be provided in accordance with drawing No 04 Rev F Proposed Ground Floor. Thereafter, the facilities shall be retained solely for the storage of refuse and recycling in accordance with the approved plans for the lifetime of the development.</p> <p>Reason: To ensure satisfactory refuse and recycling to the properties and to protect the amenity of the adjacent residential property.</p>
10.8	<p>SUDS: Prior to commencement, a surface water drainage scheme and maintenance and management plan shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme should be supported by an assessment of the site's potential for disposing of surface water by means of a sustainable drainage system. Surface water run off to the surface water sewer network shall be limited to a rate agreed with Southern Water and shall incorporate any required mitigation measures. Thereafter, the approved scheme shall be carried out or supervised by an accredited person. An accredited person shall be someone who is an Incorporated (IEng) or Chartered (CEng) Civil Engineer with the Institute of Civil Engineers (ICE) or Chartered Institute of Water and Environmental Management (CIWEM). Thereafter, the surface water drainage scheme shall be implemented in full in accordance with the approved details prior to first occupation of the development, hereby approved.</p> <p>Prior to submission of the scheme, the applicant shall first make contact with ESCC SuDS Team and Southern Water to ensure their agreement with the scheme.</p> <p>Reason: To reduce the risk of flooding, both on and off site, to improve and protect the water quality and improve existing habitats.</p>
10.9	<p>LANDSCAPING: Prior to the completion or first occupation of the development hereby approved, whichever is the sooner; details of</p>

	<p>treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion or first occupation of the development, whichever is the sooner.</p> <p>Details shall include:</p> <ul style="list-style-type: none"> a) a scaled plan showing all hard and soft landscaping, including vegetation to be retained and planting of trees and plants; b) details of all hard surfaces; c) all boundary treatments; d) a schedule detailing sizes, species and numbers of all proposed trees/plants e) sufficient specification to ensure successful establishment and survival of new planting. <p>Any new tree(s) that die(s) are/is removed, become(s) severely damaged or diseased shall be replaced and any new planting (other than trees) which die, is removed, becomes severely damaged or diseased within five years of planting shall be replaced. Replacement planting shall be in accordance with the approved details unless agreed otherwise with the Local Planning Authority.</p> <p>Reason: To safeguard and enhance the character and amenity of the area.</p>
10.10	<p>Bat, Bird, Bee: Details of bat boxes, bird boxes, and bee bricks, including their design, number and location on the site, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the boxes and bee bricks shall be installed in accordance with the details approved and retained as such thereafter.</p> <p>Reason: In the interest of the protection of bat, bird and bee habitats from the impacts of the development.</p>
10.11	<p>External Lighting: No external lighting shall be installed to the west elevation or within the rear gardens of the dwellings, hereby approved, unless details of such lighting, including the intensity of illumination and predicted lighting contours, have been first submitted to, and approved in writing by, the Local Planning Authority prior to first occupation/use of the site. Any external lighting that is installed shall accord with the details so approved for the lifetime of the development, hereby approved.</p> <p>Reason: In the interest of the protection of bat habitats and to safeguard a dark corridor along the western boundary.</p>
10.12	<p>Habitat Clearance: Any habitat clearance works shall be carried out under precautionary Method of works as outlined in Appendix V of the preliminary ecology appraisal dated 27 March 2024 ref 5632E/24/01.</p> <p>Reason in the interest of the protection of reptile habitat from the impacts of the development and site clearance.</p>

11.	Appendices
11.1	None.

12.	Background Papers
12.1	None.