

APPLICATION NO.	P18/S2434/FUL
APPLICATION TYPE	FULL APPLICATION
REGISTERED	27.7.2018
PARISH	SHIPLAKE
WARD MEMBER(S)	Leigh Rawlins & David Bartholomew
APPLICANT	Shiplake College
SITE	Land at Shiplake Farm, Reading Road, Shiplake, RG9 4BX
PROPOSAL	Change of use from agricultural to playing fields
OFFICER	Marc Pullen

1.0 INTRODUCTION

- 1.1 The application site is agricultural in use and lies south of Shiplake College. The site is approximately 9.1 hectares in size and is accessed off Reading Road by an existing field access. The site does not lie within any special designation and lies within Flood Zone 1.
- 1.2 This application is referred to the Planning Committee because the officer's recommendation for approval conflicts with the views of Shiplake Parish Council. The full reasoning for Shiplake Parish Council's objections to the proposed development are set out in the consultations and representations section.

2.0 PROPOSAL

- 2.1 This application seeks planning permission to change the use of the existing agricultural land into playing fields which are to be used by Shiplake College. Engineering works will be required to 'cut and fill' certain areas of the land in order to create of the new playing fields. The playing fields would be accessed by foot via an existing footpath leading from Shiplake College. Once the new pitches are provided the intention is to return the existing playing fields close to the River Thames to their previous agricultural use.
- 2.2 The application seeks to provide six new grass-covered pitches with associated goal posts. The plans indicate the intention to carry out additional planting comprising trees and hedgerows around the new pitches. The application has been amended to re-site the pitches marginally further away from 'The Warren' which is a Local Wildlife Site.
- 2.3 All consultation responses are detailed in **Appendix 1** of this report. Copies of the plans accompanying the application are attached at **Appendix 2**. Full copies of the plans and consultation responses are available for inspection on the Council's website at www.southoxon.gov.uk

3.0 SUMMARY OF CONSULTATIONS & REPRESENTATIONS

3.1 Shiplake Parish Council – Object

- The Parish recognises the need and desire for the College to improve the rugby fields but object to the change of use as the fields in question are productive, irrigated farm land and removal of such a large acreage would seriously impact on the future viability of Shiplake Farm. The future viability of Shiplake College would not be seriously impacted by locating the rugby pitches on other land
- The landscape value of the open fields, reflecting the rural character of the village would be lost
- Approval would encourage other applications for developments on agricultural land

- The impact on local wildlife needs to be considered carefully as in recent months, since gravel extraction has begun closer to Shiplake, wildlife is seeking refuge in the environmentally safer fields

CPRE – Object

Countryside Officer – No strong views, subject to conditions

Drainage Officer – No strong views

Forestry Officer – No strong views, subject to conditions

Contaminated Land Officer – Further details required

Landscape Consultant – No strong views on the amended plans subject to conditions

Oxfordshire County Council – No strong views, subject to conditions

Leisure Team – No strong views

Sport England – No objections

Local residents – 67 Letters of Objection and 32 Letters of Support

4.0 **RELEVANT PLANNING HISTORY**

4.1 No relevant planning history.

5.0 **POLICY & GUIDANCE**

5.1 **National Planning Policy Framework & National Planning Practice Guidance**

5.2 **South Oxfordshire Core Strategy 2012 policies;**

CS1 - Presumption in favour of sustainable development

CSB1 - Conservation and improvement of biodiversity

CSEN1 - Landscape protection

CSQ3 - Design

CSR3 - Community facilities and rural transport

CSS1 - The Overall Strategy

5.3 **South Oxfordshire Local Plan 2011 policies;**

C3 - Special character of the River Thames

C4 - Landscape setting of settlements

C8 - Adverse affect on protected species

C9 - Loss of landscape features

CON11 - Protection of archaeological remains

CON12 - Archaeological field evaluation

CON13 - Archaeological investigation recording & publication

D1 - Principles of good design

E9 - Extensions to existing institutions

EP1 - Adverse affect on people and environment

EP2 - Adverse affect by noise or vibration

EP3 - Adverse affect by external lighting

EP6 - Sustainable drainage

EP8 - Contaminated land

G2 - Protect district from adverse development

G4 - Protection of Countryside

R1 - Outdoor sport or play areas

R4 - Outdoor sport facilities in the countryside

R8 - Protection of existing public right of way

T1 - Safe, convenient and adequate highway network for all users

5.4 **South Oxfordshire Design Guide**

6.0 **PLANNING CONSIDERATIONS**

6.1 The main planning considerations in the determination of this application are:

- The need for the proposed development to serve Shiplake College
- Whether the principle of the use is acceptable
- Whether the proposed development would result in adverse harm to the landscape character and appearance of the area
- Whether the proposed development would harm the ecological value of the site or any important landscape features (trees etc)
- Whether the proposed development would harm the amenity of neighbours
- The connectivity of the site to Shiplake College
- Any wider benefits of the proposed development
- Other matters

The need for the proposed development to serve Shiplake College

- 6.2 Shiplake College currently benefits from a number of playing fields, to support the sporting activities of the school's pupils. Five of these are currently located close to the River Thames and have been leased from a local farmer since 1993. Shiplake College also leases land to the east of the main campus off the A4155 which accommodates two pitches. In addition to this, there is a sports field in front of the main school buildings, off the A4155, where cricket is played. Shiplake College have stated that they have needed additional playing fields since the 1960s due to the limited size of the land owned by the College.
- 6.3 Negotiations with neighbouring land owners has secured leases for some land around the school. However, there are issues with the quality of the five riverside pitches, which prevents them from ever being of a satisfactory standard for the College. The regular flooding of these fields often leaves the pitches unusable and results in the loss of valuable sports time and often interferes with scheduled match play and practices within the academic year. The riverside pitches are used during term time up until Easter and rugby is played during September – December and sevens during January - March.
- 6.4 The search for alternative sites appears to be extensive over a twenty-five-year process but, for various reasons, alternative sites have not been acceptable or available to the College. The river side field where the existing five pitches are located has only ever been considered as a temporary solution to the Shiplake College's need. The College has now identified the application site as an available and viable alternative to provide new pitches that can be used all year round.
- 6.5 The application site would accommodate six playing pitches and would be linked to Shiplake College by foot, in a similar way to how the College currently accesses the existing riverside pitches. The school currently use fields along Memorial Avenue for practising, but these fields are not considered sufficient to meet the need of the College and, given the close proximity to neighbouring properties, their use can be disruptive to residents. The College currently uses Reading Hockey Club and Sonning Hockey Club facilities for hockey as they have artificial pitches. However, these facilities cannot be used for rugby. The College state that the six new pitches are needed, given the increasing need for more teams as more children wish to play.
- 6.6 Information has been submitted by the College detailing the level of disruption caused by the flooding of the existing riverside pitches. This information states that more than 70 home matches have been cancelled over the past six years. Some of these matches have been absorbed by playing away fixtures, but this does not address the

fundamental issue of the quality of the riverside pitches and their inability to accommodate matches (and practice), especially during the winter months. It has been questioned whether the College could share existing pitches with other rugby clubs. Shiplake College see sharing other pitches as a problem as this not only results in the wear and tear to the soil, which results in less availability to play, but would also be problematic on fixture days as matches will likely clash with each other.

- 6.7 A feasibility study report into the existing riverside pitches has been submitted in support of this application. The aim of this report is to ascertain what improvements are considered necessary, desirable and feasible in order to use the existing riverside pitches on a more permanent basis. This comprises an assessment of the area to determine the nature of the land and existing soil profile to ascertain the cost and design requirements. In addition, a topographic survey has been carried out to determine the existing levels and to assist with the planning of the pitches and the associated drainage layouts. This study found that the existing river side field would require improved drainage and maintenance to allow the pitches to be used for prolonged periods.
- 6.8 The most significant problems associated with flooding, aside from the disruption of fixtures, is silt capping resulting in loss of surface connection to the drains, together with damage to the grass sward. The existing agricultural drainage system is not considered sufficient for sports pitch drainage as there is no surface connection. The soil on these pitches are heavy textured which are very slow to drain and become waterlogged following periods of prolonged wet weather. At present, only the southern area of the field can be used for sports in its current state. Without drainage assistance, these pitches would normally only accommodate up to 3 hours of youth play or 1-2 hours of adult per week. Section 5.5 of this report outlines the necessary expenditure to improve the riverside field to provide appropriate playing fields. This expenditure spans from approximately £330k for just the southern aspect of the field to £632k for the whole field, with an approximate maintenance cost of £30k and £56k respectively. Every time the playing fields flood or become waterlogged the school would have to go through the process again, incurring further expenditure.
- 6.9 A local farmer has offered to carry out the necessary works to the fields and provided an appraisal for the works. However, this assessment, in the view of Shiplake College, would not achieve the same quality as the College's own assessment or meet the required standards.

Policy assessment of the principle of the development

- 6.10 The National Planning Policy Framework (NPPF), section 8, refers to promoting healthy and safe communities. The provisions of section 8 apply largely to the wider community needs and benefits of social, recreational and cultural facilities. The proposed development would broadly adhere to the aims of section 8 by promoting an active and healthy lifestyle. Policy E9 of the South Oxfordshire Local Plan (SOLP) relates to development proposals for institutions in the countryside. In the rural areas of the district, (i.e. outside the built-up area of the settlements), there are a number of large complexes of buildings used by institutions, such as private schools and nursing homes. Where extensions to these complexes are sought, the Council will consider any proposal in the light of Policy E9 (SOLP).
- 6.11 Policy E9 (SOLP) allows extensions to existing institutions in the countryside provided that:
- (i) the site is not within the Green Belt

- (ii) the proposal does not conflict with the policies in this plan to protect the landscape
- (iii) the proposed extension is of a scale and type of development appropriate for the site and its surroundings, and the extension is well related to the existing buildings on the site
- (iv) the design and materials used are in keeping with the existing buildings and suitable landscaping is provided where appropriate, and
- (v) in the case of proposals which would generate significant additional journeys, the site is in a location which is accessible by public transport and/or by cycling and walking

6.12 This policy makes clear that the acceptability of the proposed development relies not solely on the need for the development but to the wider impacts of the development, with notable reference to the impact on the wider landscape.

6.13

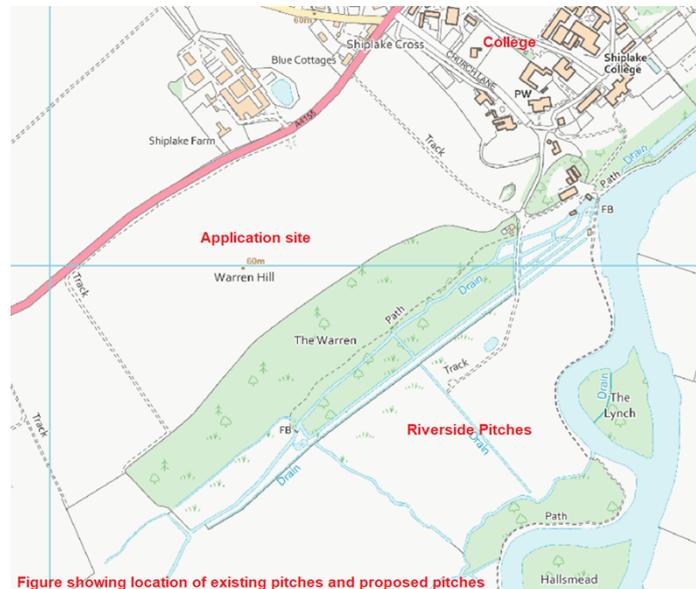


Figure showing location of existing pitches and proposed pitches

Whether the proposed development would result in adverse harm to the landscape character and appearance of the area

- 6.14 The proposed development would be on land currently agricultural in use, south-west of the main College campus. The site is bound by an area of dense woodland ('The Warren') to the south-east and a hedgerow along the A4155 (Reading Road). The site is visible from an existing field access which intersects the hedgerow along the A4155 and would also be visible, in part, from the immediate adjacent fields and public footpaths. The site does not lie within the Green Belt or an Area of Outstanding Natural Beauty but it retains a visual link to the surrounding countryside looking towards the village. Views vary between short, middle and long-distance due to the rising topography to the north west and the low, and in places, fragmented hedgerows forming field boundaries and enclosing rural lanes. The perceived openness, agricultural management, plantation woodland, hedgerows and mature field trees all add to the rural appearance of the site.
- 6.15 Policy CSEN1 of the South Oxfordshire Core Strategy (SOCS) seeks to protect the district's distinct landscape character and key features against inappropriate development. Where development is regarded as acceptable in principle measures should be sought to integrate it into the landscape character of the area. The landscapes and waterscapes of the River Thames corridor will be maintained and

where possible enhanced. Policy C3 (SOLP) seeks to maintain, and where possible, enhance the distinctive character of the River Thames. Policy C4 (SOLP) seeks to restrict development that would damage the attractive landscape setting of settlements of the district. Policy G4 (SOLP) seeks to protect the countryside for its own sake and importance.

- 6.16 The site lies at the boundary of the National Landscape Character Area 110 Chilterns and Upper Thames Clay Vales (2013), defined as extensively wooded and farmed Chilterns landscape. The Oxfordshire Wildlife and Landscape Study (OWL) is the current landscape character assessment for Oxfordshire and is used in conjunction with landscape character assessments. This report identifies the site as within the Oxfordshire Regional Character Area of the 'Chilterns' and 21: Wooded Farmland.

Relevant key characteristics of Wooded Farmland are:

- A distinctively ancient, rural character typified by a mosaic of woodland, enclosed pasture, arable fields as well as scattered farms and settlements;
- Large blocks of ancient woodland and a large number of plantations;
- A varied field pattern of arable land and pasture enclosed by woodland and hedges;
- Species rich hedgerows with many hedgerow trees;
- Dispersed settlement pattern with settlements and scattered farms.

- 6.17 The South Oxfordshire Landscape Character Assessment (LCA, 2003) identifies the site as within the Thames Valley and Fringes character area. Within this character area the application site lies within the semi-enclosed dip slope area.

The key characteristics of this area are:

- sloping ground and minor valley at foot of Chilterns dip slope next to the valley floor around Lower Shiplake and a small area to the north of Henley adjacent to the floodplain;
- mixture of medium-scale fields to west of the A4155 and smaller-scale field pattern around the settlement edges;
- strong structure of hedgerows, trees and small blocks of woodland, generally provides visual containment and results in moderate inter-visibility;
- predominantly rural character, especially to the west of the A4155, but some localised influence from roads, ribbon development on minor roads and built-up areas immediately around settlement edges.

- 6.18 Guidance on the suitability of development proposals within the Thames Valley and Fringes area concludes:

- landscapes on the fringes of settlements are particularly vulnerable to change and special attention should be paid to creating strong landscape 'edges' to reduce the urbanising influences of development on adjacent countryside and to prevent the coalescence of settlements
- development within visual exposed landscapes will be highly prominent and is also generally undesirable

- 6.19 The South Oxfordshire LCA, 2003, report states that the key landscape enhancement priorities within the Thames Valley and Fringes area should:

- encourage better maintenance of field boundaries and discourage further hedgerow removal and replacement by fencing
- improve landscape structure and land management on the fringes of built areas and along main roads to mitigate adverse impacts on the surrounding countryside and river corridor landscape

- encourage the maintenance and restoration of parkland landscapes and features within the river corridor
 - maintain permanent pasture and riverside trees to reinforce the tranquil, pastoral character of the river corridors
- 6.20 The South Oxfordshire Landscape Character Assessment (LCA, 2017) also identifies the land as lying within the Thames Valley and Fringes Landscape Character area 11. Within this character area lies the site falls into Landscape Character Type (LCT) 16: Semi-enclosed Dip Slope, with strong structures of hedgerows and trees with small blocks of woodland which generally provides visual containment and results in moderate inter-visibility. These areas are also a mixture of medium-scale fields and smaller-scale field patterns around the settlement edges. The existing pitches are located within LCT 5: Flat Floodplain Pasture, which is characterised by flat, low-lying farmland which is prone to flooding and is intimate and tranquil with a remote character and low inter-visibility with views along the river corridor possible. The LCA 2017 has recently been given weight in the determination of planning appeals given its greater consistency with the NPPF, than compared to the earlier 2003 LCA report. The LCA 2017 identifies the key characteristics of the semi-enclosed dip slope area as very similar to the previous LCA 2003 report.
- 6.21 The enhancement strategy in the LCA 2003 for this site and the settlement edge set was to 'conserve', reflecting the area's unspoilt, ancient character, its diverse and intact landscape structure, its high aesthetic appeal and its valued habitats and archaeological resources. The LCA 2017 subsequently omitted the enhancement strategies, however the principle of 'conserve' is still applicable.
- 6.22 The council appointed landscape consultants to assess the impact of the proposed development. In their initial comments they expressed concern about some matters, most notably the impact on the landscape character and appearance of the site, the rural association with the agricultural use of the site and the surrounding areas and the lack of detail within the applicant's Landscape Visual Impact Assessment (LVIA).
- 6.23 The applicant's LVIA and plans indicate that the development would not adversely harm the landscape character of the site or the surrounding area. New hedgerows along the west and east boundaries would ensure that the playing surface and sporting activities would be well screened from views. The new eastern hedge would be along the same line as the historic field boundary which once marked the change from the flat field to the small valley, west of the village. The single mature tree in the field would be retained and a new hedge will be established, and individual trees will be planted along the line of the lost central hedgerow. These hedges will assist in restoring the historic field pattern and will act as wildlife corridors, connecting the hedge along the A4155 with 'The Warren'. In the view of our Landscape Consultant this would comply with the strategies and aims of the Oxfordshire Wildlife & Landscape Study and the Historic Landscape Characterisation. It is noted that the only significant perceived adverse change to the character of the landscape is the visibility of the tops of the goal posts as seen above the hedgerows. The goal posts have to be at a set height to accord with Sports England guidance. The applicant's LVIA concludes that the change of use of agricultural land to playing fields will have a slight adverse effect on the landscape character.
- 6.24 Revisions to the LVIA were made during the application process. Following the submission of the revised versions our Landscape Consultant concluded that the enhancement of the scenic qualities of the plateau, by the mitigation planting, is of sufficient weight to offset the visual intrusion caused as a result of the introduction of the new goal posts, the manicured grass playing surface and alteration to ground

levels, which have been confirmed as reversible. The visual impact and harm caused by the goal posts, which would be most notable in the winter months from nearby public footpaths would not be significant in planning terms. In their view, the mitigation provided by the lowering of the pitches and the planting scheme has improved the proposal and contains appropriate species. As such, they no longer object to the proposed development. In their view, the proposed development would not result in adverse harm or a significant departure to the landscape character and appearance of the site and its surroundings. They suggest that conditions are attached to a planning permission to require the submission and approval of landscaping details and a landscape management plan as well as ensuring that the new hedgerow shown to the west is extended to connect it to 'The Warren'.

- 6.25 The applicant's LVIA states that the restoration of the riverside field would provide a benefit that would offset the impact caused to the application site. Whilst officers accept that there would be a benefit from restoring the riverside field, the relative impacts on these two sites cannot be directly balanced. This development is not a like for like change - the character of both places matters in their own right and are independent of the changes to another area, as such the benefits in one distinct character area does not necessarily justify harm in another. Therefore, whilst officers note the benefits created by restoring the riverside field, this benefit cannot in itself justify the impact caused by the proposed development. However, the benefit of restoring the riverside field is acknowledged and would adhere to aims of Policy C3 (SOLP).

Whether the proposed development would harm the ecological value of the site or result in any adverse harm to important landscape features (trees etc)

- 6.26 Policy CSB1 (SOCS) and Policy C8 (SOLP) seek to conserve and improve biodiversity habitats. Any development that would have an adverse effect on a site supporting a protected species will not be permitted. The NPPF requires planning decisions to protect and enhance sites of biodiversity and minimise impacts on biodiversity. The council's countryside officer does not object to the proposed development. The site is contiguous with the Warren Wood Local Wildlife Site to the south east. In the view of the council's countryside officer, the change of use to playing fields is unlikely to have an adverse impact on this area. Due to the intensive management to support monocultures, arable fields have a generally low ecological value. It is noted that no external lighting is proposed and the copse of trees in the centre of the site are to be retained. It is recommended that, should planning permission be granted, a landscaping condition is attached, to secure the proposed planting delivers a biodiversity gain to the site.
- 6.27 Policy C9 (SOLP) seeks to resist any development that would cause the loss of landscape features, where those features make an important contribution to the local scene, important wildlife habitat and/or have important historical value. The council's forestry officer raised concern with the initial submission, citing the lack of arboricultural information supporting the application. Following the submission of revised plans, the council's forestry officer is satisfied that the proposed new pitches would lie outside of the root protection area of the nearby woodland trees to the south. The footpath has also been relocated so that it provides greater clearance to the trees located to the south east of the site where it meets up with the existing path and, subject to a no-dig construction, will not have any detrimental impact on the adjacent trees. The forestry officer therefore has no objection to the proposed development, subject to conditions requiring the submission of a landscaping scheme and detailed tree protection measures, and the proposed development would not result in any significant or adverse harm to ecology or important trees.

- 6.28 The site is classified as Grade 3 Agricultural Land: ‘Good to Moderate’ by Natural England. Officers acknowledge that the land can be used for agricultural use and its change of use would prohibit arable farming of the land. However, the development is designed to be reversible and would not result in the permanent loss of this land or the likelihood for the land to be farmed in the future. As such, officers do not consider the development would directly conflict with the aims of the NPPF.

Whether the proposed development would harm the amenity of local occupiers

- 6.29 The site lies in relative isolation from residential built form. Shiplake Farm lies on the opposite side of the A4155, but given the distance of more than 150 metres, officers are satisfied that the proposed development would not have any direct impact on the amenity of the residents. External lighting would be prohibited on the site through a condition. The use of the pitches will inevitably result in some noise but given the level of use and the time of day, it would not result in any significant harm to the nearest neighbours.

The connectivity of the site to Shiplake College

- 6.30 The proposed development would be accessed via an existing pathway that runs south from Church of St Peter and St Paul, past Robin Hill Cottage and Court Mead. This link is the same means of access that students already take when accessing the riverside pitches. Hence the site would be easily accessible from the College without the need for vehicles.

Wider benefits of the proposed development

- 6.31 The proposed development would have obvious benefits for the College and the social welfare of students. The applicants have also considered whether the proposed new pitches could be offered for wider use by the local community. They have agreed to enter into a Community Use Agreement (CUA) to allow the wider community to use the new pitches, through formal agreement, when they are not in use by the College. This would be a wider benefit of the proposed development.
- 6.32 Policy CSR3 (SOCS) supports proposals for the provision of facilities and services in rural areas. Policy R4 (SOLP) supports proposals for outdoor sport in the countryside provided that (among other things) the development does not adversely affect local amenity, the enjoyment of the countryside or the rural character and landscape quality of the site and the surrounding area. Policy R1 (SOLP) supports proposals for new or improved facilities for outdoor sport to serve the local need. Whilst this proposal is not meeting an identified local need, it would provide an additional outdoor recreational area for the local community at the discretion of the College. This would contribute to the wider aims of the NPPF. In your officer’s view, the acceptability of the scheme would be not be dependent on a signed/agreed CUA, so a condition requiring its implementation would not be necessary. However, the CUA has been drawn up and demonstrates the applicant’s willingness to provide a wider benefit to the community.
- 6.33 As previously discussed, the restoration of the existing riverside pitches to agricultural land would improve the landscape character of the site. Whilst this does not justify the impact of the proposed development it would result in a positive improvement to the landscape character of the River Thames.

- 6.34 The proposed development would support Shiplake College, result in improvements to the social wellbeing and health of students and support the College's sporting commitments. The development would result in positive ecological enhancements to the site and would not adversely impact the nearby wildlife site or landscape features. Whilst the development would reduce the opportunities for farming the land it would not be a permanent loss and could be reversed if needed in the future.

Other matters

- 6.35 Community Infrastructure Levy (CIL) - This development would not result in any new residential use and therefore is not liable to pay CIL.
- 6.36 South Oxfordshire Local Plan - On 10th October 2019 the Secretary of State for Housing Communities and Local Government issued a Holding Direction on the Council in relation to the emerging Local Plan 2034. The holding direction has been made under the provisions of Section 21A of the Planning and Compulsory Purchase Act 2004. This means that the emerging plan has 'no effect whilst the direction is in force', this is set out in section 21A (2) of the Planning and Compulsory Purchase Act 2004.
- 6.37 Neighbourhood Plan - Shiplake Parish are currently working on drafting a Neighbourhood Plan. However, this plan is still at draft stage and has not been out to consultation. In accordance with paragraph 48 of the NPPF, the plan does not carry weight at this stage.

7.0 CONCLUSION

- 7.1 In your officer's view, the proposed development would support Shiplake College, result in improvements to the social wellbeing and health of students and support the College's sporting commitments. The new pitches would enable the restoration of the existing riverside pitches. The development, as amended, would have an acceptable impact upon the landscape character and appearance of the area. The development would result in positive ecological enhancements to the site and would not adversely impact the nearby wildlife site or landscape features. Whilst the development would reduce the opportunities for farming the land it would not be a permanent loss and could be reversed if needed in the future. As such, officers recommend that planning permission should be granted.

8.0 RECOMMENDATION

- 8.1 **That planning permission should be granted subject to the following conditions:**

- 1 : Commencement of development within three years of date of planning permission**
- 2 : Development to be implemented as per approved plans**
- 3 : Landscape Management Plan to be submitted to and approved by the Local Planning Authority prior to commencement of development**
- 4 : Details of Landscaping of the site (including footpath access and any hardstanding) to be submitted to and approved by the Local Planning Authority prior to commencement of the development**
- 5 : Details of surface water drainage to be submitted to and approved by the Local Planning Authority prior to commencement of the development**
- 6 : Development must be accessed via the proposed pedestrian footpath, provided from Shiplake College**
- 7 : The existing riverside pitches (edged in blue) to be restored to previous state prior to the first use of the new pitches**
- 8 : A construction traffic management plan should be submitted to and approved**

- by the Local Planning Authority prior to commencement of the development
- 9 : A phased risk assessment shall be carried out in order to identify any potential contaminative uses, details of which shall be submitted to and approved by the Local Planning Authority prior to commencement of the development**
- 10 : Tree Protection details to be submitted to and approved by the Local Planning Authority prior to commencement of the development**
- 11 : No lighting shall be installed to serve the new pitches**

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