

Item No. 7

APPLICATION NUMBER	CB/16/02132/OUT
LOCATION	Land to rear of 104 to 168 Station Road, Lower Stondon, Henlow
PROPOSAL	Outline Application: Residential development together with associated landscaping and access
PARISH	Stondon
WARD	Arlesey
WARD COUNCILLORS	Cllrs Dalgarno, Shelvey & Wenham
CASE OFFICER	Nikolas Smith
DATE REGISTERED	26 May 2016
EXPIRY DATE	25 August 2016
APPLICANT	Bovis Homes
AGENT	Optimis Consulting
REASON FOR COMMITTEE TO DETERMINE RECOMMENDED DECISION	This is a major application and the Parish Council has objected. Its approval would constitute a departure from the Development Plan.
	Outline Application - Approval

Reason for recommendation:

This development would fall outside of the Settlement Envelope for Stondon but would constitute sustainable development because the harm caused by it would not significantly and demonstrably outweigh the benefits, which include the delivery of up to 80 new homes within the five year period. The access to the site would be safe and other matters would be reserved for subsequent approval.

Site Location:

The site has an area of approximately 2.3ha and located immediately to the west of an existing housing development constructed by the applicant (referred to as Stondon Park). To the west and south of the site is Mount Pleasant Golf Course, where planning permission has been granted for a nine hole extension. To the north of the site are gardens serving properties on Station Road.

The site is undeveloped, open space and is currently used for horse grazing. It has an Agricultural Land Classification of 3b and so it cannot be classified as Best and Most Versatile agricultural land.

The site is adjacent to but outside of the Stotfold Settlement Envelope.

The Application:

Outline planning permission with all matters reserved except access is sought for a residential development at the site. The applicant has not proposed a maximum number of units for the site. 35% of the dwellings would be affordable homes. Access would be taken through the existing development from Station Road.

A full planning application has been submitted at the site for a residential development of 80 dwellings. This application is pending and it is anticipated that it will be presented to a future meeting of the Committee.

Relevant Policies:

National Policy and guidance

National Planning Policy Framework (NPPF) (2012)

National Planning Practice Guidance (NPPG) (2014)

Local Policy and guidance

Central Bedfordshire Core Strategy and Development Management Policies - North (2009)

CS1	Development Strategy
CS2	Developer Contributions
CS3	Healthy and Sustainable Communities
CS4	Linking Communities – Accessibility and Transport
CS5	Providing Homes
CS6	Delivery and Timing of Housing Provision
CS7	Affordable Housing
CS13	Climate Change
CS14	High Quality Development
CS15	Heritage
CS16	Landscape and Woodland
CS17	Green Infrastructure
CS18	Biodiversity and Geological Conservation
DM1	Renewable Energy
DM2	Sustainable Construction of New Buildings
DM3	High Quality Development
DM4	Development Within and Beyond Settlement Envelopes
DM9	Providing a Range of Transport
DM10	Housing Mix
DM13	Heritage in Development
DM14	Landscape and Woodland
DM15	Biodiversity
DM16	Green Infrastructure
DM17	Accessible Green Spaces

Site Allocations (North) Development Plan Document (2011)

Central Bedfordshire Design Guide (2014)

Central Bedfordshire Sustainable Drainage Guidance SPD (2014)

Mid-Bedfordshire Landscape Character Assessment (2007)

Minerals and Waste Local Plan: Strategic Sites and Policies (2014)

Development Strategy

At the meeting of Full Council on 19 November 2015 it was resolved to withdraw the Development Strategy. Preparation of the Central Bedfordshire Local Plan has begun. A substantial volume of evidence gathered over a number of years will help support this document. These technical papers are consistent with the spirit of the NPPF and therefore will remain on our website as material considerations which may inform further development management decisions.

Relevant Planning History:

CB/12/02929/FULL Erection of 98 dwellings, garaging and associated works after the demolition of No's 186 and 188 Station Road to provide for a new access road.

Approved: 4th November 2013

CB/15/01454/MW 9 hole extension to existing golf course through the importation of inert waste, incorporating landscaping works and water harvesting system.

Approved: 22nd July 2015

CB/16/2314/FULL Erection of 80 residential dwellings together with associated access and landscaping

Decision pending

Consultation responses:

Neighbours were written to and press and site notices were published. The responses are summarised below:

Stondon Parish Council Objection for the following reasons:

- This extension of the original development was not proposed by Bovis at any meetings with the Parish Council during the first development program.
- The Parish Council has never been consulted about this extensive development and is contrary to the information published in Design and Access statement page 11 item 2.12.3
 - There are a number of other errors such as reference to the transport museum and similar amenities which closed some time ago
 - a. We do not believe a viable assessment of traffic movement of lorries and deliveries has been

practically assessed and the impact on the neighbours already living in the current development

- Traffic entering the estate, such as large trucks, delivery wagons, contractors cars etc will have to negotiate the narrow streets and paving while children, parents and others are going to work and school. Potentially raising the risk of an accident or fatality.
- 1. The traffic assessment does not include the proposed volume of additional traffic that will be present during the development of the Golf Course.
- 1. The assessment of the agricultural land seems to be missing key information
- 1. We have not seen an independent survey of the agricultural land and believe that this maybe of a high quality suitable for farming.
- 1. The local Schools cannot accommodate additional children without extensive redevelopment and this project does not propose to address this. This concern was raised during the first phase by Stondon Lower School and in recent discussions the Head Teacher they advised the Chair of the Parish Council that they have now implemented a waiting list as the school has filled all available places.
- 1. Lack of notification to the local residents on street signs and via letters etc, nor had any consultation with local residents been done at the time of this meeting.

The current Bovis Phase 1 development has put a strain on local community resources and this development is almost doubling the volume of houses adding more pressure on those limited local resources.

Once again this seems to be a large housing developer blatantly ignoring the local community and only looking for the maximum profit from minimum outlay.

It does not seem to care about talking to the community or discussing the development and the benefits to propose to deliver to the community.

If Bovis Homes takes the time to come and talk to the local community and does not shirk its responsibilities, potentially our position on this

development might change.

Neighbours

22 letters of objection were received. Comments made can be summarised as follows:

1. The site would be cramped and over developed
2. Lorry and traffic movements would be disruptive
3. There is not sufficient infrastructure in Stondon to accommodate the development
4. There would be a loss of wildlife and green space
5. Stondon would lose its village feel
6. Houses are needed but villages are impacted disproportionately
7. The use of the access would not be safe
8. The existing development has a lot of pedestrian areas which are not suited for additional traffic
9. There should be a separate access for the new development
10. Traffic along Station Road is already bad
11. There would be a loss of privacy for existing residents

Consultee responses:

Minerals and Waste

The application site is adjacent to a permitted golf course extension to the west and south. This is acknowledged on the drawings, but is not fully assessed within the application. There are three issues that need to be considered.

1. The golf course extension is to be created/landscaped through the importation of approximately 300,000 cubic metres of inert waste over a 2 year period. During the development phase this has the potential to cause some nuisance in terms of dust, noise and vibration, and phase 2 of the housing development would be more exposed than phase 1. The golf course consent is subject to a noise condition but that would have been calculated in relation to houses existing or permitted at the time. The scheme could become less workable by introducing a larger number of houses and extending the length of the boundary over which the two are immediately adjacent. The noise assessment submitted with the housing application does not acknowledge this permitted development or give consideration to the potential noise impact. As such it is deficient.

Clearly the timing of the two operations is the critical factor here. The golf course development must commence by the 22nd July 2018 and be completed within a further two

years. Either the applicants should be asked to amend the noise assessment to take account of this or a condition should be imposed to prevent the occupation of the houses until the golf course development is complete. The latter would also avoid any potential issues with regard to dust and vibration. Potentially, a condition could be worded to say that the houses should not be occupied 'before the 22nd July 2020 or until the Council confirms in writing that the adjacent golf course development is complete, whichever is the sooner'. In practice, it is anticipated that the golf course development will commence shortly, so the acceptable date could be as early as the second half of 2018.

2. The development of the golf course will generate up to 182 HGV movements a day. The Traffic Impact Assessment does have regard to this and allows for 12 HGV movements per hour during the peak periods. The planning permission for the golf course actually allows 14, but I am not assuming this will make a significant difference. The Assessment does not consider construction traffic for the housing development but, again, that may not be important.

3. Once the golf course is complete, there would appear to be some potential for golf balls to come across the boundary into the housing development given the proximity, particularly from fairway number 5. Some consideration needs to be given to this and expert advice may be required. This might possibly result in the need to modify the proposed boundary treatment. There is no condition on the golf course permission relating to this, but the layout of the fairways was agreed in the absence of houses on this area.

In conclusion, therefore, points 1 and 3 require some further assessment by the applicants, ideally in consultation with the owners of the golf course to arrive at an agreed position. On point 2, I leave it with our colleagues in Highways DC to advise whether or not this is an issue.

Once an updated Noise Report was submitted, the following comments were received:

With regard to the golf course development, the report relies upon the fact that the conditions on that consent impose a noise limit at the boundary of any residential property and, it is argued, there is not therefore an issue. However, the current application would introduce new houses into the equation that were not considered in

relation to the noise assessment for the golf course extension.

Looking at that original noise assessment it is clear that the golf course operations will have difficulty in achieving the 55dBALeq1hr limit at existing residential properties and that the operator will be dependent on operating at the higher limit of 70dBALeq1hr permissible for temporary periods of up to 8 weeks. Introducing new houses along a further 300 metres of the site boundary would exacerbate the difficulty of achieving acceptable noise levels throughout the operations.

In relation to any new houses, that were neither existing nor permitted at the time of the golf-course application, the Council might have difficulty enforcing the permitted noise level, since Planning Practice Guidance imposes a responsibility on the Planning Authority to consider the effect of existing or permitted noise sources before granting planning permission for residential development. We are talking here about an inert waste disposal operation that is expected to take 2 years to complete, which is a significant enough time for complaints to arise.

Assuming there are no other overriding objections to this application, I do not consider that the golf course consent is sufficient to merit refusal but, to protect the amenities of any residents occupying the new development, the consideration of timing is critical. I therefore recommend the imposition of the following condition if permission is granted:

The residential properties hereby permitted shall not be occupied before the 22nd July 2020 or the completion of the construction of the adjacent golf course extension (CB/15/01454/MW), as certified in writing by the Planning Authority, whichever is the sooner, unless a detailed noise assessment has first been submitted to and approved in writing by the Planning Authority, which demonstrates that the residential properties to be occupied are unlikely to suffer noise nuisance as a result of construction operations on the golf course.

Reason: To prevent adverse effects on occupants of the residential development and to avoid prejudicing the deposit of inert waste and associated landscaping operations on the adjacent site during the construction phase of the golf course, in accordance with saved policy GE25 of the Bedfordshire and Luton Minerals and Waste Local Plan 2005.

I don't believe that this would be unreasonably restrictive and it would allow the developer to liaise with the operator on the Golf Course to produce an appropriate timetable for development, if necessary applying for a phased occupation of the houses. It also makes matters simpler in that it should facilitate actual noise measurements of the golf course operations, which have not yet commenced.

I hope this will be seen as a reasonable solution.

Highways

The developer suggests that this is Phase 2 of their existing site currently nearing completion resulting in a development approaching 200 units served from a single point of vehicle access, the new estate road and junction onto Station Road. Whilst I would strongly prefer that a second means of access be provided toward the western end of the site I have no technical standard that suggests that the proposal would result in a too high a number of units to be served from a single point of access and therefore I reluctantly acknowledge that there is no justifiable reason to raise and sustain a highway objection through the planning process.

In these circumstances the following highway conditions and advice notes are recommended should the grant of planning permission be considered.

Trees and Landscape

The site is currently agricultural land with boundary hedge lines and trees. Supplied with the application is a Tree Survey and Arboricultural Impact Assessment that identifies all trees and hedges on site along with their retention categories and root protection areas.

The impact on trees should be minimal but will require protection throughout development through the use of tree protection fencing and ground protection as required. To this end we will require a Method Statement showing these details, and steps to be taken through development.

Two groups of trees are identified for removal which would be acceptable.

Detailed landscape and boundary treatment details will be required.

Ecology

I have no objection to the proposed development. I note that houses adjacent to boundary hedgerows will be orientated to overlook hedgerows rather than back onto them which is welcomed. The NPPF calls for development to deliver a net gain for biodiversity and opportunities for enhancement should be considered. The POS in the SE

should ideally be seeded with a species rich grassland mix and I would like to see integrated bird / bat bricks used in all properties. SuDS should be multi functional, providing ecological and GI benefits in addition to attenuation. A nectar / berry rich planting palette would also achieve biodiversity gains.

Sustainable Growth

The proposed development should comply with the requirements of the development management policies: DM1: Renewable Energy; DM2: Sustainable Construction of New Buildings; and Core Strategy policy CS13: Climate Change. The policies require all new development of more than 10 dwellings to meet CfSH Level 3 and deliver 10% energy demand from renewable or low carbon sources. The energy standard of the CfSH Level 3 is below standard required by the Part L2013 of the Building Regulations. The development should therefore as minimum comply with the new Part L2013 of Building Regulations and deliver 10% of their energy demand from renewable sources. In terms of water efficiency, the development should achieve 110 litres per person per day (105 litres for internal water usage and 5 litres for external water usage).

I welcome the applicant's fabric first approach to develop energy efficient dwellings. This approach will ensure that the dwellings have low energy demand throughout their lifetime. However the policy DM1, which is not mentioned in the Design and Access Statement, asks for the developments above threshold of 10 dwellings to deliver 10% of its energy demand from renewable or low carbon sources. The fabric first approach will ensure that energy demand will be reduced and therefore the installation of renewable or low carbon technology will be smaller to satisfy the policy requirement.

Policy CS13 requires that all development takes into account climate change and its impacts on the development. The development therefore should be designed with climate change in mind taking account of increase in rainfall and temperature. The development should therefore minimise hard standing surfaces and increase green, natural areas to allow rainwater infiltration and minimise heat island effect through evaporation and tree shading. Light colour building and landscaping materials should be prioritised over dark coloured which

absorb more sun light and retain heat increasing urban heat island effect.

I would like more information on how policies requirements will be met to be submitted with the full planning application. The information should cover: energy and water efficiency, renewable energy contribution, climate change adaptation measures to minimise risk of overheating in dwellings and proposed ventilation strategy.

To ensure that the policies requirements are met I request following planning condition to be attached, should the planning permission be granted:

12. 10% energy demand of the development to be delivered from renewable or low carbon sources;

13. Water efficiency to achieve water standard of 110 litres (including 5 litres for external use) per person per day;

14. Assessment of overheating risk in dwellings.

Local Plan Team

At the time of writing (23/06/16) the Council cannot demonstrate a five year supply of deliverable housing land. This means that under the provisions made in paragraph 49 of the National Planning Policy Framework 2012, policies concerned with the supply of housing (including DM4, DM14, and CS16 of the North Core Strategy) must be regarded as 'out-of-date', and that permission should be granted unless the harm caused "significantly and demonstrably" outweighs the benefits.

However, recent case law tells us that these policies should not be disregarded. On the contrary, 'out of date' policies remain part of the development plan, and the weight attributed to them will vary according to the circumstances, including for example, the extent of the five year supply shortfall, and the prospect of development coming forward to make up this shortfall.

At the time of writing the Council can demonstrate a supply of 4.76 years, this equivalent to 95% of the five year requirement and is a shortfall of 467 dwellings. The Council is confident that there is sufficient development coming forward in the short term to make up this shortfall. In this context it is reasonable to afford Policies DM4, DM14 and CS16 a level of weight proportionate to this

supply when considering the planning balance.

Pollution Control

Having considered the Opus Geo Environmental Investigation Report dated April 2016 I concur that all potential pollution pathways for contamination appear to be broken and therefore it is very unlikely that there is any land contamination at the proposed development site.

I have also considered the contents of the noise.co.uk Environmental Noise Survey and assessment dated 4th April 2016 and note the mitigation required for windows and ventilators to achieve noise standards with respect to road traffic noise from station road as stated in table 9.2.1 as living rooms 16 dB Rw+Ctr, Dining rooms 11 dB Rw + Ctr, and Bedrooms 15 dB Rw +Ctr. the report has shown that the developers standard window and ventilator specification comfortably exceeds these sound insulation requirements.

In response to the updated Noise Report, that looked more closely at the relationship with the approved golf course works, the following comments were received:

Whilst I appreciate that there could be construction noise impacts during the construction of the Golf Course this matter would be regulated under The Control of Pollution Act 1974 Section 60 (CPA) by the pollution team if complaints are received. BS5228 Part 1 2009 section A.3.3.2 summarises the power to serve a notice imposing requirements on construction sites as follows;

Section 60 of the Control of Pollution Act 1974 [9] enables a local authority, in whose area work is going to be carried out, or is being carried out, to serve a notice of its requirements for the control of site noise on the person who appears to the local authority to be carrying out the works and on such other persons appearing to the local authority to be responsible for, or to have control over, the carrying out of the works.

This notice can perform the following functions.

a) Specify the plant or machinery that is or is not to be used.

However, before specifying any particular methods or plant or machinery, the local authority has to consider the desirability, in the interests of the recipient of the notice in question, of specifying other methods or plant or

machinery that will be substantially as effective in minimizing noise and vibration and that will be more acceptable to the recipient.

b) Specify the hours during which the construction work can be carried out.

c) Specify the level of noise and vibration that can be emitted from the premises in question or at any specified point on those premises or that can be emitted during the specified hours.

d) Provide for any change of circumstances. An example of such a provision might be that if ground conditions change and do not allow the present method of working to be continued then alternative methods of working should be discussed with the local authority.

The S60 CPA notice can be served to protect the new properties in addition to existing ones and has even been served to protect new houses on a large site from the construction noise of other houses on the same development. Of course new residents of the Bovis development itself may complain about the construction noise for the later phases of the development.

Conditions 15 and 28 of the golf course permission do seek to protect existing houses from golf course construction noise and in meeting these conditions for existing houses some protection will also be provided to the Bovis development although I do agree with the point that the noise level (condition 28) cannot be enforced if the noise levels specified are exceeded at the Bovis site but not at any of the existing properties.

Unfortunately condition 15 of the golf course permission specifies hours of work from 0700 to 1900 hrs Monday to Friday and 0700 to 1300 hrs Saturdays whereas under The Control of Pollution Act 1974 section 60 CBC (pollution) require all noisy construction works (works which are audible at the site boundary) in the district to be undertaken between the hours of 0800 to 1800 hrs Monday to Friday and 0800 to 1300 hrs on Saturdays and at no time on Sundays, Bank or Public Holidays. This situation has occurred before and whilst developers can

complain that one part of the council has permitted them to work certain hours and another has restricted them to different times we have had to serve S60 CPA notices in similar circumstances before.

With reference to Mike's e mail comments below regarding the report, table 8.2.1 is listing the minimum sound reduction required by the housing façade to achieve the internal noise standards with respect to measured existing road traffic noise levels of 50.8 dBA. If you look at appendix D they have provided a facade calculation for daytime and night time conditions. This calculation shows that for an external noise level of 50.8 dBA (daytime) they will achieve 23.9 dBA internally in habitable rooms assuming that the windows are Saint Gobain Weber 4/20/4 and the ventilator is a Triton XS3 which they state is Bovis's standard specification. Therefore they achieve a 26.9 dB sound reduction through the building facade. Therefore if the external noise level is 55 dBA the internal noise level would be 28.1 dBA and still meet the BS8233 standards (with windows closed).

In conclusion I am satisfied that the proposed site will comfortably achieve the CBC noise standards with a typical standard form of construction for monitored existing road traffic noise. Construction noise from the golf course (if the houses are built before it is completed) can be controlled under The Control of Pollution Act 1974 S60 with respect to existing and new occupants.

Finally, it should be noted that the developers would potentially have a defence against charges under the Control of Pollution Act 1974 if they are using "best practicable means" (BPM) to control noise emissions. BPM may differ from the 55 dBA level quoted in condition 28 of the Golf Course permission.

Housing Development
Officer

Whilst this application proposes an affordable housing policy compliant scheme of 35% (28 units) I am unable to offer support in the current proposal. The application proposes a 50/50 tenure split providing 14 units of affordable rent and 14 units of intermediate tenure. This goes against the Council's tenure requirements of 73% affordable rent and 27% intermediate tenures. Based on a tenure compliant scheme I would expect to see 20 affordable rent units (73%) and 8 intermediate tenure (27%). There has been no supporting evidence submitted

with the application demonstrating why the Council tenure requirement can not be adhered to.

I would like to see the affordable units dispersed throughout the site and integrated with the market housing to promote community cohesion & tenure blindness. I would also expect the units to meet all nationally prescribed space standards. We expect the affordable housing to be let in accordance with the Council's allocation scheme and enforced through an agreed nominations agreement with the Council. If these comments are taken on board, I would support this application.

Anglian Water

No objection.

Adult Social Care

Summary:

Our view is that the needs of older people should be considered as part of this proposal and, should approval be given, we would support a significant proportion of houses in the scheme being suitable for older people, by incorporating some or all of the design features mentioned above.

Public Art

Central Bedfordshire Council actively encourages the inclusion of Public Art in new developments and looks to developers / promoters of sites to take responsibility for funding and managing the implementation of Public Art either directly or through specialist advisers and in consultation with Town and Parish Councils and Central Bedfordshire Council.

Key requirements are:

15. Public Art be integrated in the development design process and be addressed in Master plans and Design Codes.
16. Where possible artists should be appointed as part of the design team.
17. Public Art should be site specific; responding to place and people including environment and materials.
18. Public Art should be unique, of high quality and relevant to local communities.

Public Artists can include:

Artists and artisans, artist architects, landscape artists - with experience in working in collaboration with developers, design teams and local communities.

If the application were to be approved I request a Condition be applied with suggested wording but await

your advice on this:

No part of development shall be brought in to use until a Public Art Plan is submitted to and approved in writing by the Local Planning Authority . Installation of Public Art shall commence on site prior to occupation of 50% of dwellings. The Public Art Plan shall be implemented in full and as approved unless otherwise amended in accordance with a review to be agreed in writing by the Local Planning Authority.

The Public Art Plan should detail:

19. Management - who will administer, time and contact details, time scales / programme
20. Brief for involvement of artists, site context, background to development , suitable themes and opportunities for Public Art
21. Method of commissioning artists / artisans, means of contact, selection process / selection panel and draft contract for appointment of artists
22. Community engagement - programme and events
23. Funding - budgets and administration.
24. Future care and maintenance.

Education

No objection subject to contribution.

Leisure

No objection.

Archaeology

The proposed development site lies within an area that is known to contain archaeological remains dating to the late Bronze Age through to the middle Iron Age (HER 16973, HER 19455 and HER 20309) and under the terms of the *National Planning Policy Framework* (NPPF) these are heritage assets with archaeological interest.

To the east of the proposed development site lie a series of enclosures (HER 19455) that were investigated prior to the construction of the current Bovis housing development. These enclosures may have formed agricultural paddocks and were dated to the early-middle Iron Age (Albion Archaeology 2013). To the south of the proposed development site lies another single enclosure which also dates to the early - middle Iron Age (HER 16973) and a water pit (HER 20309) which may be late Bronze Age in date (Albion Archaeology 2015). Given the co-location of these features and the similar date range it is likely that they all form part of a broadly contemporary landscape.

This application is accompanied by a geophysical survey report (Stratascan, dated 05/05/16) and an archaeological

desk-based assessment (CgMs, dated May 2016). The geophysical survey suggests that no archaeological features of a substantial size are present within the application area. The archaeological desk-based assessment concludes that while the Central Bedfordshire Council Historic Environment Record (HER) mapping suggests that cropmarks HER 16973 partially cover the proposed development site, the geophysical survey suggests that there are in fact no archaeological features within the application area.

It is disappointing that the applicant did not chose to wait for the Local Planning Authority to issue its pre-application response (reference CB/16/01592/PAPC) before submitting this planning application. If they had waiting for the pre-application response, then they may have noted that the archaeological advice referred to an archaeological investigation on the land immediately to the south, which was undertaken in 2015. This investigation confirmed the presence of the features which show as cropmarks (HER 16973) but also uncovered other features (for example HER 20309) which were hitherto unknown and which did not show up when a geophysical survey was undertaken at that particular site. The desk-based assessment that accompanies this planning application makes no reference to the features identified on the land to the south and therefore its conclusions cannot be considered valid, because it has not considered all of the available data for this area.

While the geophysical survey results indicate that the application area does not contain any substantial archaeological remains, it is known that smaller features, dating to the later Bronze Age do exist on the land immediately to the south. These are features that were not picked up during a comparable geophysical survey. As a consequence the presence of archaeological remains at this site cannot be entirely discounted.

Understanding landscape development and settlement patterns, the relationship between settlement and enclosure (Going and Plouviez 2000, 21 and Oake et al 2007, 11 - 12) and the ritual codes underlying the later prehistoric and Roman periods are regional archaeological research objectives (Oake et al 2007, 12 and Medlycott 2011, 48).

Paragraph 141 of the NPPF states that Local Planning Authorities should require developers to record and advance understanding of the significance of heritage assets before they are lost (wholly or in part) in a manner

proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (CLG 2012).

The proposed development will have a negative and irreversible impact upon any surviving archaeological deposits present on the site, and therefore upon the significance of the heritage assets with archaeological interest. This does not present an over-riding constraint on the development providing that the applicant takes appropriate measures to record and advance understanding of any surviving heritage assets with archaeological interest. This will be achieved by the investigation and recording of any archaeological deposits that may be affected by the development and the scheme will adopt a staged approach, beginning with a trial trench evaluation, which may be followed by further fieldwork if appropriate. The archaeological scheme will include the post-excavation analysis of any archive material generated and the publication of a report on the investigations. In order to secure this scheme of works, please attach the following condition to any permission granted in respect of this application.

“No development shall take place until a written scheme of archaeological investigation; that adopts a staged approach and includes post excavation analysis and publication, has been submitted to and approved in writing by the Local Planning Authority. The said development shall only be implemented in full accordance with the approved archaeological scheme.”

Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the *National Planning Policy Framework* (NPPF) that requires developers to record and advance of understanding of the significance of any heritage assets to be lost (wholly or in part) as a consequence of the development.

This request is in line with the requirements of Chapter 12 of the NPPF.

Green Infrastructure

The application does not clearly demonstrate a net gain in green infrastructure. There is little information about the design of the central green space, and how it would contribute to green infrastructure enhancement, and is integral to the overall design and sense of place of the scheme.

The proposals for sustainable drainage, and the extent to which they deliver multiple environmental benefits are not satisfactory. The SuDS are not integrated within the development, and are essentially limited to an attenuation pond in the corner of the site. There is contradictory information in the application regarding the relationship between the built form of development and this attenuation pond, with the parameters plan showing an outward facing built form, but the indicative layout in the Design and Access Statement showing it backed onto by housing.

There is no at surface conveyance of surface water; the Flood Risk Assessment notes that swales will not be incorporated into the drainage strategy, with no justification for this. Given that CBC's SPD identifies a local requirement for conveyance to be at surface, rather than piped, this is not an acceptable approach, and the application is contrary to CBC's adopted guidance.

The SuDS system should be integrated within the development, with development relating positively to SuDS features, that are designed to be an integral part of the green space network, and providing multiple environmental benefits.

Clear information about adoption of SuDS is not provided. The applicant indicates that the preferred option is for Anglian Water to adopt the attenuation pond, but a secondary option would be for CBC to adopt it as LLFA. This indicates a lack of discussion with CBC, and comprehension of adoption issues. As and LLFA, CBC does not adopt SuDS, so this proposal indicates a lack of realistic options on adoption. Given the requirement under national guidance for LPAs to satisfy themselves that there are clear proposals in place for the management and maintenance of the SuDS over the lifetime of the scheme, I do not consider that we can be confident that this is the case.

Overall, therefore, I do not consider that the scheme demonstrates a net gain in Green Infrastructure, and is therefore contrary to CS17 of the Core Strategy for Central Bedfordshire. The proposals for sustainable drainage do not meet requirements in CBC's Sustainable Drainage SPD, and do not provide clear information on adoption.

I would not recommend the granting of planning permission until the development can demonstrate a net GI gain, and includes proposals for SuDS that are in line

with CBC's Sustainable Drainage SPD, and have clear information on adoption proposals.

Landscape Officer

I have no objections to the continuation of the Stondon Park development. However, I would hope that this development would bring a greater number of street trees as the Phase 1 development appears to have very few planted, particularly along the main access. The urban style bow top fencing along the boundary of Phase 1 is a feature I would not want to be extended into Phase 2.

The documents show a variance between the Concept Plan - which contains a central open space as well as the attenuation basin - and the layout given in the DAS which illustrates houses on the area for the LAP. I assume the Concept Plan is the document to work with.

A fully detailed Landscape scheme will be required as a Condition. Most crucially in landscape terms is the need to maintain the boundary hedge and hedgerow trees - the trees on the western boundary create a valuable landscape feature. A Landscape Management Plan will also be required, which will guide sympathetic management of the boundary hedge as well as the other features. A balance needs to be found between the proposed height reduction of the hedge and the need to maintain screening integration of the new development as well as the wildlife corridor. A final height of no less than 1.75m should be maintained - this would allow for annual growth extending up to 2m. The properties can enjoy views of the golf course from the upper stories.

I would also prefer a scheme with a more imaginative design for the SUDS - a scheme which would contribute to the landscape structure eg with tree planting, play features or seating. The location of the LAP could also be more central to this phase of the development.

New tree planting needs to be of predominantly native species near the site boundary, and I welcome the planting of alternate species to ash, with the aim of diversifying the tree stock. Within the residential area more ornamental street trees could be selected. I would like the ornamental shrub planting to avoid over use of evergreen mews style planting which has an urban style. Grassed areas forming a corridor with the boundary hedge would benefit from being of ecological value, as with the attenuation basin.

The need to minimise light intrusion is also an important design consideration.

SuDS Team

We consider that outline planning permission could be granted to the proposed development and the final design, sizing and maintenance of the surface water system agreed at the detailed design stage, if the following planning conditions are included:

Comments and recommendations:

25. Units are miss matched in some places. Providing the outfall from phase 2 does not exceed 9l/s and the final total outfall (phase 1 and 2 completed) into the Anglian Water system does not exceed 24l/s, and this is agreed and adopted by Anglian Water the following comments and recommendations apply.

26. Where permeable paving is proposed we advise the design criteria is demonstrated in accordance with the 'CIRIA RP992 The SuDS Manual Update: Paper RP992/28 Design Assessment Checklists for Permeable/Porous Pavement'.

27. It is unclear how the (outlined) storage capacity of the pond has been determined. The final detailed design must demonstrate the methodology and calculations to determine the size of the attenuation feature. The design scheme, including pond, should conform to the Ciria SuDS Manual, the Non-statutory technical standards for sustainable drainage systems

(March 2015), and other sources of best practises. The pond must work as part of a management wide approach to surface water drainage, incorporating the principles of the treatment train and the local requirements identified in the Sustainable Drainage Guidance, adopted as a Supplementary Planning Document in April 2014. The final detailed design should focus is on creating multi functional features at surface level.

28. Details of the proposed construction, management and future maintenance requirements of the surface water drainage scheme should be provided with the final detailed design. Adequate access to

the surface water system should be provided in the sizing and layout of the scheme, with details of the proposed arrangements for maintenance. Where Anglian Water Ltd are to adopt parts of the system, correspondence should be provided to demonstrate the final detailed design has been approved by them.

Internal Drainage Board No objection

Determining Issues:

The considerations in the determination of this application are:

1. The weight that should be afforded to the development plan
2. The principle of the development
3. The appearance of the site, the area, the landscape impact and Green Infrastructure
4. The impact on neighbours and future living conditions
5. Access to the site and other highways implications
6. Archaeology
7. Trees and hedgerows
8. Ecology and biodiversity
9. Land quality
10. Drainage
11. Energy efficiency
12. Planning obligations
13. The planning balance and conclusions

Considerations:

1. The weight that should be afforded to the development plan

S38(6) of the Planning and Compulsory Purchase Act (2004) and the National Planning Policy Framework (NPPF) (2012) set out that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (para 11).

At the heart of the NPPF is a presumption in favour of sustainable development. Local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet objectively assessed needs. For decision making this means that planning permission should be granted where the development plan is absent, silent or out-of-date (para 14). Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing targets (para 49). There should be an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moving forward from later in the plan period) to provide a realistic prospect

of achieving the planned supply and to ensure choice and competition in the market for land (para 47).

Recent appeal decisions have found that the Council does not have a five year housing land supply and insofar as a number of the Council's policies are concerned with the supply housing, they should be considered out of date. Policy DM4, where it prevents development outside of Settlement Envelopes, is one such policy.

The amount of weight that should be given to those out of date policies is influenced by the proximity of housing supply to housing need. At the time of writing, the Council is very near to being in a position to demonstrate an ability to meet its housing for the five year period (4.76 years, or around 95%) and so appropriate weight can be given to housing restraint policies.

Paragraph 14 of the Framework confirms that where relevant policies of the development plan are out of date, permission should be granted unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework, taken as a whole or specific policies in the Framework indicate development should be restricted.

2. The Principle of the development and housing delivery

The site falls outside of the Stondon Settlement Envelope and Policy DM4 seeks to restrain development within the open countryside. The proposed development would conflict with that policy and appropriate weight can be given to this conflict on account of the current relationship between housing supply and need. This conflict weighs against the approval of the development.

The NPPF sets out that where a full five year housing supply cannot be demonstrated, development should be considered sustainable unless harm caused by it significantly and demonstrably outweighs the benefits.

Here, up to 80 dwellings (which would be secured by condition) would be provided by the development and 35% of those would be affordable homes. The applicant has committed to a legal obligation that would ensure the delivery of 100% of the units within a five year period from the date of a decision.

As a result, the development would positively contribute towards the supply of housing to help meet need. Significant weight should be attributed to that benefit in the planning balance.

The conflict with Policy DM4 in so far as it seeks to restrain development in the open countryside would not, in itself, significantly and demonstrably outweigh that benefit.

Additional material planning considerations may contribute towards the benefits and the dis-benefits of the development and can impact of the final planning balance. These are described below.

3. The appearance of the site and the area, the landscape impact and Green

Infrastructure

Appearance of the site the area

The application is submitted in Outline with all matters reserved but for access but the applicant has submitted an indicative layout plan to show how the development might be accommodated.

Policy DM3 states that all proposals for new development will be appropriate in scale and design to their setting and contribute positively to creating a sense of place.

The pre-ambles to Policy CS16 states that the countryside outside settlements is a highly valued resource for agriculture, recreation, landscape and wildlife. The Council will protect the countryside for its own sake, safeguarding it from the increasing pressures of development.

The appearance of the site would clearly change significantly because it would be built on. Its rural character would be replaced by an urban one.

The site is, though, relatively secluded, set behind houses on Station Road and with only limited views in to it from public areas to the north and the impact of the development on the appearance of the area would be less significant and could be further reduced by successful landscaping, that would be a reserved matter.

It is important that the site should not be developed in a fashion that would conflict with the existing built character of the area. Whilst relatively secluded, it would become part of the urban context of this part of Stondon. A condition would limit the total number of dwellings at the site to 80. This would result in a density of around 34dph, which, subject to layout and design, could result in an acceptable character of development for this site.

The site has a good relationship with the existing urban area of Stondon with housing to the north and east. The golf course to the west and south forms a natural edge to the settlement and the development would be sit to the north of that 'buffer'.

Landscape impact

The Council's Landscape Officer has raised no objection to this application and there would no significant harm caused to the wider landscape setting of the site.

4. The impact on neighbours and future living conditions

Policy DM3 requires that new development to respect the amenity of neighbouring properties. The neighbours most likely to be affected by the development are those to the north on Station Road and those within the existing Stondon Park Development. These impacts could, for the most part, be managed at Reserved Matters stage through a carefully designed layout.

One area of concern for a number of residents within the Stondon Park development is disruption caused by additional traffic passing through the estate in to the new development. Whilst there would be a significant change for these residents (the road that would lead in to the new development is currently a cul-de-sac), that change would not likely cause noise or disturbance on a level that could be considered materially harmful.

Another concern is that disruption would be caused by construction vehicles passing through the existing development. A condition would require a Construction Management Plan so as to seek reduce those impacts as far as possible.

A scheme could be designed at this site that had an acceptable impact on the living conditions of neighbours.

Policies CS14 and DM3 seek design that is of a high quality. That includes complying with the current guidance on noise. The Council's Design Guide reinforces the objectives that new residential development is of a high quality that provides an acceptable standard of living accommodation for future occupiers.

Planning permission has recently been granted for an extension to the Mount Pleasant Golf Course to the south and west of the site. This will involve the transportation of large amounts of earth to the site. Construction could take around two years.

The Council's Minerals and Waste Team are concerned that these works would cause significant disruption to future residents of the proposed development in the event that they are occupied before or during the golf club extension. The Council's Public Protection Team is satisfied, though, that because of the temporary (albeit relatively lengthy) construction period and construction hours conditions attached to the golf club consent, together with protection afforded to potential future residents by other legislation, the impact should not, in itself, prevent planning permission being granted.

5. Access to the site and other highways implications

Highways

Policies CS14 and DM3 require that developments incorporate appropriate access and linkages, including provision for pedestrians, cyclists and public transport and that they provide adequate areas for parking and servicing. The Council's Design Guide provides further detailed technical standards that should be applied to new residential development.

The proposed access to the site would be in the same location as that which exists from Station Road through Stondon Park. The Council's Highways Officer is satisfied that this access is safe and could accommodate the additional traffic associated with the proposed development.

A number of residents have correctly highlighted that it is possible that should permission be granted for this development, both it and the golf course development could take place at the same time. This would have an impact on the amount of heavy goods vehicles using the local road network. A Construction Management Plan would be secured by condition that would seek to control that impact and the Council's Highways Team is satisfied the cumulative, temporary highways implications of the developments would not result in a severe highways impact, which the NPPF sets out is the only time that planning permission should be withheld on transport grounds.

Subject to internal road layouts and parking provision that could be controlled at Reserved Matters stage, and planning conditions that would have been imposed in the event of an approval, the highways implications of the development would be acceptable.

6. Heritage Assets

Policies CS15 and DM13 seek to protect, conserve and enhance the district's heritage assets, including archaeology.

The applicant has submitted an Archaeological Assessment of the site and the County Archaeologists have requested that a condition requiring further investigation is attached to any planning permission.

7. Trees and hedgerows

The application has been supported by a tree survey which is satisfactory and a condition would seek to ensure that existing trees and hedgerows were properly protected during construction. A scheme for hard and soft landscaping across the site would be secured at reserved matters stage.

8. Ecology and biodiversity

An Ecological Survey has been submitted in support of the application. The County Ecologist has raised no objection to the application. The NPPF calls for development to deliver a net gain for biodiversity. An acceptable scheme for the net gain for biodiversity would be secured by condition in line with policies CS18 and DM15 and the Council's Design Guide and the NPPF.

9. Land quality

The applicant has submitted a Geo-Environmental Survey. No objection has been raised by the Council's Public Protection Team.

10. Flood risk and Drainage

The site falls within Flood Zone 1 (low risk).

Policy DM3 requires that new development complies with current guidance on water. The Central Bedfordshire Sustainable Drainage Guidance SPD (2014) contains current guidance on how water should be managed within development

sites.

Conditions would secure details of a sustainable drainage scheme for the site.

11. Energy efficiency

Policy DM1 requires that developments achieve 10% or more of their own energy requirements through on-site or near site renewable or low carbon technologies unless it can be demonstrated that to do so would be impracticable or unviable. Policy DM2 requires that all proposals for new development should contribute towards sustainable building principles.

A condition would require details of energy efficiency measures.

12. Planning obligations

Policy CS2 states that developer contributions will be expected from any development which would individually or cumulatively necessitate additional or improved infrastructure, or exacerbate and existing deficiency.

Policy CS7 states that on all qualifying sites, 35% or more units should be affordable.

35% of the units at the site would be affordable homes.

The applicant has agreed to comply with a Build Rate Timetable that would see all of the units delivered within 5 years of planning permission being granted.

Details of further contributions that would be secured will be reported in the Late Sheet.

13. The planning balance and conclusions

Planning law requires that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Council cannot currently demonstrate an ability to meet its housing need for the next five-year period. As such, Policy DM4, insofar as it prevents development outside of the Settlement Envelope, is out of date. That said, appropriate weight can be afforded to 'out of date' policies because the Council can demonstrate an ability meet a large proportion of its housing need.

There is a presumption in favour of sustainable development at paragraph 14 of the NPPF. Where an ability to meet identified housing need cannot be demonstrated, the development would be sustainable if the dis-benefits of the development would not significantly and demonstrably outweigh the benefits.

Significant weight must be given to the delivery of up to 80 homes (including affordable homes) at the site over the next five-year period.

There are no harmful impacts associated with the development that individually or collectively would significantly and demonstrably outweigh that benefit, and the other benefits of the development.

Recommendation:

That Planning Permission is approved subject to the successful completion of a legal agreement reflecting the terms set out above and in the Late Sheet and the following conditions:

RECOMMENDED CONDITIONS / REASONS

- 1 An application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 No development shall commence at the site before details of the layout, scale, appearance and landscaping, including boundary treatments (hereinafter called "the reserved matters") relating to that Phase have been submitted to and approved in writing by the local planning authority. The development shall be carried out as approved.

Reason: To comply with Article 3 of the Town and Country Planning (General Development Procedure) Order 2015.

- 3 The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.

Reason: To comply with Section 92 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 4 **No development shall take place until a Construction Management Plan detailing access arrangements for construction vehicles, on-site parking, loading and unloading areas, materials storage areas and wheel cleaning arrangements shall be submitted to and approved in writing by the Local Planning Authority. The construction of the development shall be carried out in accordance with the approved Construction Management Plan.**

Reason: In the interest of highway safety, to ensure a satisfactory standard of construction and layout for the development and to comply with Policy DM3 of the Core Strategy and Development Management

Policies 2009.

- 5 Any application for reserved matters shall include details of the existing and final ground, ridge and slab levels of the buildings. The details shall include sections through both the site and the adjoining properties and the proposal shall be developed in accordance with the approved details.

Reason: To ensure that an acceptable relationship results between the new development and adjacent buildings and public areas in accordance with policy DM3 of the Core Strategy and Development Management Policies (2009).

- 6 **No development shall take place until details of Local Equipped Areas of Play and Local Areas of Play together with a timetable for their implementation have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out as approved and in accordance with the approved timetable.**

Reason: To ensure that the appearance of the development and facilities for residents would be acceptable in accordance with Policy DM3 of the Core Strategy and Development Management Policies 2009

- 7 **No development shall commence until a detailed surface water drainage scheme for the site, based on the agreed drainage Strategy (FRA: 15-0735, 2016) has been submitted to and approved in writing by the Local Planning Authority. The scheme will include details of how the scheme shall be maintained and managed after completion. The scheme shall include provision of attenuation and a restriction in run-off rates as outlined in the FRA. The scheme shall be implemented in accordance with the approved final details before the development is completed.**

No building/dwelling shall be occupied until a management and maintenance plan for the surface water drainage has been submitted to and approved in writing by the Local Planning Authority. The approved surface water drainage scheme shall be correctly and fully installed as per the approved details. The scheme shall be implemented in accordance with the approved final details before the development is completed and shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan.

Reason: To ensure the approved system will function to a satisfactory minimum standard of operation and maintenance and prevent the increased risk of flooding both on and off site, in accordance with para 103 NPPF and to ensure that the implementation and long term operation of a sustainable drainage system (SuDS) is in line with what has been approved, in accordance with Written statement - HCWS161.

- 8 The details required by Condition 1 of this permission shall include a scheme of measures to mitigate the impacts of climate change and deliver sustainable and resource efficient development including opportunities to meet higher water efficiency standards and building design, layout and orientation, natural features and landscaping to maximise natural ventilation, cooling and solar gain. The scheme shall then be carried out in full in accordance with the approved scheme.

Reason: To ensure the development is resilient and adaptable to the impacts arising from climate change in accordance with the NPPF.

- 9 **No development shall take place at the site before a scheme for biodiversity enhancement at the site including a timetable for its delivery has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out as approved and in accordance with the approved timetable.**

Reason: To ensure that biodiversity is properly protected at the site in accordance with Policy DM3 of the Central Bedfordshire Core Strategy and Development Management Policies (2009) and the National Planning Policy Framework (2012).

- 10 **No development shall take place until a written scheme of archaeological investigation; that adopts a staged approach and includes post excavation analysis and publication, has been submitted to and approved in writing by the Local Planning Authority. The said development shall only be implemented in full accordance with the approved archaeological scheme.**

Reason: This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the NPPF (2012) that requires developers to record and advance of understanding of the significance of any heritage assets to be lost (wholly or in part) as a consequence of the development.

- 11 No more than 80 dwellings shall be constructed at the site.

Reason: To ensure that the development would be of an appropriate density in accordance with Policy DM3 of the Central Bedfordshire Core Strategy and Development Management Policies (2009) and the Central Bedfordshire Design Guide (2014).

- 12 Other than where specifically required by a condition attached to this decision the development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans and reports referenced LST1-02-100, LST1-02-110, JKK9131-RPS-Figure 01.01, LST1-02-120, LST1-02-120, LST1-02-130, S3180/03, Environmental Noise Survey and Assessment dated July 2016, Design and Access Statement

dated May 2016, Planning Statement dated May 2016, Archaeological Desk Based Assessment dated May 2016, Preliminary Ecological Assessment dated March 2016, Geophysical Survey Report dated May 2016, Arboricultural Impact Assessment, JKK9131 - RPS-figure 02.01, Agricultural Land Classification report (undated), Landscape and Visual Impact Assessment dated May 2016, Transport Assessment dated May 2016, Level 1 Flood Risk Assessment and Surface Water Drainage Strategy dated May 2016, Framework Travel Plan dated May 2016, Geo-environmental Investigation Report dated April 2016 and Foul Sewerage and Utilities Assessment dated May 2016

Reason: To identify the approved plan/s and to avoid doubt.

- 13 **No development shall take place at the site before a Method Statement detailing how retained trees and hedgerows will be protected at the site has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out as approved.**

Reason: To ensure that trees and hedgerows are properly protected at the site in accordance with Policy DM3 of the Central Bedfordshire Core Strategy and Development Management Policies (2009).

INFORMATIVE NOTES TO APPLICANT

1. The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Central Bedfordshire Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. Further details can be obtained from the Development Control Group, Development Management Division, Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ.
2. The applicant is advised that if it is the intention to request Central Bedfordshire Council as Local Highway Authority, to adopt the proposed highways within the site as maintainable at the public expense then details of the specification, layout and alignment, width and levels of the said highways together with all the necessary highway and drainage arrangements, including run off calculations shall be submitted to the Development Control Group, Development Management Division, Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ . No development shall commence until the details have been approved in writing and an Agreement made under Section 38 of the Highways Act 1980 is in place.
3. The applicant is advised that no highway surface water drainage system designed as part of a new development, will be allowed to enter any existing highway surface water drainage system without the applicant providing

evidence that the existing system has sufficient capacity to account for any highway run off generated by that development. Existing highway surface water drainage systems may be improved at the developers expense to account for extra surface water generated. Any improvements must be approved by the Development Control Group, Development Management Division, Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford SG17 5TQ.

Statement required by the Town and Country Planning (Development Management Procedure) (England) Order 2015 - Part 5, Article 35

The Council acted pro-actively through positive engagement with the applicant at the pre-application stage and during the determination process which led to improvements to the scheme. The Council has therefore acted pro-actively to secure a sustainable form of development in line with the requirements of the Framework (paragraphs 186 and 187) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

DECISION

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