

Item No. 08

APPLICATION NUMBER	CB/17/00293/FULL
LOCATION	Land at 118B High Street, Clophill, Bedford, MK45 4BJ
PROPOSAL	Demolition of existing dwelling and outbuilding and erection of six detached dwellings with associated garaging, parking, landscaping and ancillary works
PARISH	Clophill
WARD	Amphill
WARD COUNCILLORS	Cllrs Duckett, Blair & Downing
CASE OFFICER	Dee Walker
DATE REGISTERED	23 January 2017
EXPIRY DATE	20 March 2017
APPLICANT	Projectpart Homes Ltd
AGENT	Woods Hardwick Planning Ltd
REASON FOR COMMITTEE TO DETERMINE	Ward Cllr Downing called in on grounds of Overdevelopment, overbearing, highways safety and impact on landscape
RECOMMENDED DECISION	Full Application - Granted

Site Location:

The application site comprises of 0.4ha of undeveloped rear garden and grass land to the rear of nos. 116, 118, 118a and 118b High Street in Clophill. The land is located to the south of the High Street and a Public Right of Way runs along the eastern side of the site. A proportion of the site is located inside of the Clophill Settlement Envelope and the frontage of the site sits within the designated Clophill Conservation Area.

The Application:

Full planning permission is sought for the erection of 6 no. detached dwellings following the demolition of no. 118b. The proposed mix of units comprises of 5 x 4Bed (Plots 1, 2, 4, 5 & 6) and 1 x 5Bed (Plot 3). They are two storey with plot 3 having a 1½ storey element. The development would be served by the existing access point to no. 118b.

RELEVANT POLICIES:

National Planning Policy Framework (2012)

- 4 Promoting sustainable transport
- 6 Delivering a wide choice of high quality homes
- 7 Requiring good design
- 11 Conserving and enhancing the natural environment
- 12 Conserving and enhancing the historic environment

Central Bedfordshire Council's Core Strategy and Development Management Policies 2009

Policy CS1	Development Strategy
Policy CS5	Providing homes
Policy CS6	Delivery and timing of housing provision
Policy CS16	Landscape and Woodland
Policy CB18	Biodiversity and Geological Conservation
Policy DM3	High Quality Development
Policy DM4	Development Within and Beyond Settlement Envelopes
Policy DM13	Heritage in Development
Policy DM14	Landscape and Woodland
Policy DM15	Biodiversity

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.

Supplementary Planning Guidance/Other Documents

Central Bedfordshire Design Guide (March 2014)

- 1 Placemaking in Central Bedfordshire
- 3 The historic environment
- 5 Residential development
- 10 Movement and streets

Relevant Planning History:

Application Number	MB/82/0677B/FULL
Description	One detached chalet bungalow
Decision	Full Application – Granted
Decision Date	22.11.1984
Application Number	MB/82/00677/OA
Description	Residential development one detached house
Decision	Outline Application – Granted
Decision Date	21.10.1982
Application Number	MB/82/0677A/FULL
Description	Temporary siting of mobile home
Decision	Full Application – Granted
Decision Date	23.10.1984
Application Number	MB/82/0677C/FULL
Description	Erection of stable block
Decision	Full Application – Granted
Decision Date	18.11.1986

Application Number	MB/00/00575/FULL
Description	Conversion of garage to playroom
Decision	Full Application – Granted
Decision Date	25.05.2000

Application Number	MB/04/01967/FULL
Description	Conservatory to side elevation (part retrospective)
Decision	Full Application – Granted
Decision Date	08.02.2005

Application Number	CB/13/00840/OUT
Description	Erection of 3 new dwellings and retention of existing house
Decision	Not Proceeded With
Decision Date	12.11.2013

Consultees:

Parish Council	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> • The bulk of this development is outside the village settlement envelope and impacts on a conservation area; • Lack of affordable housing and the stance CBC has taken on this subject; • Applicant has not engaged with parish council to discuss proposal and mitigation; • Impact on local resources based on evidence that Anglia Water has identified a requirement to upgrade water/sewerage services and this place these services at an unmitigated risk; • Overbearing aspect of the properties to neighbours; • Where is the detailed feedback on how the questions in the pre-app have been addressed
CBC Archaeology	No objection subject to pre-commencement condition for the submission of a written scheme of archaeological investigation
CBC Conservation	No objection
CBC Ecology	No objection subject to relevant condition being attached to any permission granted for the incorporation of mitigation measures and biodiversity management plan
CBC Highways	No objection to on-site parking provision and impact on local highway network
CBC Housing Officer	No affordable housing would be required on this site
CBC Trees & Landscape	No objection
CBC Waste Services	No objection
CBC SuDS Team	<p>Objects to application on grounds of:</p> <ul style="list-style-type: none"> • No adopted surface water sewers in the vicinity, intention to dispose of surface water to the public foul sewer is not acceptable; • Connections to foul sewer for surface water discharge are unsustainable

Bedfordshire Fire & Rescue Safety Team I.D.B	Fire hydrants should be installed due to distance of proposed houses to nearest hydrant Concerns with regards to proposed method of storm water disposal
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Other Representations:

Neighbours

High Street – 112, 114b, 118, 118a

Summary of objections received:

- Loss of light & privacy due to close proximity of plot 6;
- Do not expect houses to be built in the conservation area and outside the settlement envelope;
- Six dwellings will surely overload the sewage & water supply;
- Houses will greatly increase the amount of traffic on the High Street and with Townshott junction in close proximity, thus posing a danger;
- Plots 3 & 4 extend into the River Flit flood plain & shouldn't be allowed;
- Old (400yrs) drainage ditch running beyond southern boundary of no. 114 should not be ignored & still an important flood release in extreme weather;
- Road at south side of site – indicates further future development;
- Proposals will impinge & endanger the 2 x Ash, 5 x Ancient Scots Pines & Holly tree on land at no. 112;
- Plots 5 & 6 will compromise privacy and light to neighbouring property;
- Development at Fossey Grove does not directly overlook any houses and are of a chalet style thus bedrooms are in the roof space therefore reducing ridge height;
- Why the need of an access point between plots 3 & 4;
- Condition required to retain trees on site and protect those immediately adjacent to site boundary in neighbouring land;
- Question the assessment of flood risk given the drainage ditch in close proximity.

Clophill Conversation Group

Concerns with encroachment on land outside the settlement envelope, cumulative impact of increased traffic flows together with the Lakes and the Quarry applications currently under consideration

Determining Issues:

The main considerations of the application are;

1. Principle
2. Effect on the Character and Appearance of the Area
3. The Historic Environment
 - a) Archaeology
 - b) Conservation Area
4. Neighbouring Amenity
5. Highway Considerations
6. Other Considerations
 - a) Flood Risk & Drainage
 - b) Ecology Considerations
 - c) Tree Considerations
 - d) Fossey Grove development
7. Conclusion and the Planning Balance

Considerations

1. Principle

- 1.1 The application site lies on the south side of the village of Clophill and the majority lies outside of the settlement envelope as defined on the Core Strategy Proposals Map. In this location, new residential development would not normally be acceptable in principle under Policy DM4 which seeks to protect the open countryside from inappropriate development.
- 1.2 In line with the core principles contained within the National Planning Policy Framework (NPPF), there is a requirement for planning authorities to *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.'* Paragraph 49 states, *'Housing applications should be considered in the context of the presumption in favour of sustainable development. 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 sites.'* Paragraph 14 of the NPPF advises that where the development plan is absent, silent or out of date, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the development.
- 1.3 Having regard to recent appeal decisions, it is accepted the Council is unable to demonstrate a five-year supply of deliverable housing sites at the present time. In such circumstances, it is appropriate to attach weight to policies relating to the supply of housing (including settlement envelopes), depending upon the level of supply shortfall. The Council is currently able to demonstrate a 4.89 year supply of deliverable housing land which represents 97.8% of the five-year supply. Members of the Committee will be aware that due to ongoing monitoring, the Council's position on its supply of housing is constantly under review. Should there be any change in its position by the time of the Committee then Officers will provide an update.

- 1.4 The proposal for 6 no. dwellings would provide limited benefit in terms of housing delivery. However, in considering the planning balance, it is necessary to consider whether the proposal is sustainable economic development or would cause significant and demonstrable harm. The planning balance is addressed in concluding on the proposal below.

2. Effect on the Character and Appearance of the Area

- 2.1 High Street is the main road through Clophill and is characterised by a variety of house types fronting onto the road. To the north of the High Street there are uniform pair's of semi-detached properties and to the south and adjacent to the application site is predominantly detached dwellings.
- 2.2 The existing dwelling, to be demolished, is set back from the highway and as such, plot 1 would provide the initial termination point into the development with the remaining dwellings being a backdrop from the highway view point.
- 2.3 In close proximity is the Fossey Grove development. Although the proposed development would be largely outside the settlement envelope, given the extent of the surrounding built environment, including rear gardens with outbuildings, it would not unduly project any further into the landscape such as to cause any visual harm or harm to the settlement pattern.
- 2.4 Given the level of detail provided with the planning application, it is not considered that the proposed dwellings would appear out of scale or character with other similar dwellings along High Street or obstructive in wider views within the landscape. The proposal otherwise meets the Council's relevant design guidance and is considered to be consistent with Policies CS14 and DM3 in terms of the need for high quality design.

3. The Historic Environment

3.1 a) Archaeology

- 3.1.1 In December 2016, an archaeological trial trench evaluation was carried out at the proposed development site and the draft report has been submitted with this planning application (Albion Archaeology 2017, v1.1). The archaeological evaluation demonstrated that remains dating to the medieval period are present at the proposed development site.
- 3.1.2 The proposed development site is located within the historic core of the village of Clophill (HER 16998) and is known to contain archaeological deposits dating to the medieval period. Therefore, the site is considered to have the potential to contribute to our understanding of the development of the medieval and post medieval village at Clophill.
- 3.1.3 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).

3.1.4 The proposed development will have a negative and irreversible impact upon any surviving archaeological deposits present on site, and therefore upon the significance of the heritage assets with archaeological interest. However, this does not present an over-riding constraint on the development providing that the applicant takes appropriate measures to record and advance understanding of the archaeological heritage assets.

3.1.5 This will be achieved by the investigation and recording of any archaeological deposits that may be affected by the development; post-excavation analysis of any archive material generated and the publication of a report on the works. In order to secure this, a condition can be attached to any planning permission granted.

3.2 b) Conservation Area

3.2.1 The site entrance is located within the designated Clophill Conservation Area. The buildings to be demolished have little architectural interest that makes a neutral contribution to the character of the Conservation Area. As such the principle of demolition of these buildings is acceptable.

3.2.2 The proposed development would be sympathetic to the character and appearance of the Conservation Area in terms of scale, siting, design, materials and detailing. Hard and soft landscaping are of key importance in order to create an access to the development that positively contributes to the character of the Conservation Area.

4. **Neighbouring Amenity**

4.1 To the east of the site is no. 120 High Street, which fronts directly onto the High Street with a large detached two storey outbuilding that abuts the boundary with the public footpath that separates it from the application site. To the west lies the extended rear garden for no. 114b. The site abuts the properties fronting onto the High Street namely nos. 116 (partially), 118 and 118a. From the neighbour representations received, the following plots have caused concerns:

4.2 Plot 1

4.2.1 The principal property that is likely to be affected by the proposal is no. 120 High Street.

4.2.2 The first floor front elevation windows to plot 1 would have views towards the High Street and at an angle to the outbuilding of no. 120. The original proposal included a balcony on the side elevation of the rear projection but following negotiation this was removed and is now a window to lessen any potential impact as it will not face out onto the private area immediately to the rear of no. 120.

4.2.3 By reason of its siting, it is not considered that there would be any significant effect by way of loss of light or overbearing impact.

4.3 Plot 5

4.3.1 The principal property that is likely to be affected by the proposal is no. 114b High Street, in particular the rearmost part of its garden.

4.3.2 The two storey rear projection was originally 2.5m off the shared boundary with bi-folding doors at the first floor. Although it was considered that the size of the projection itself was not overbearing given its siting and the spatial surroundings, the bi-folding doors created an element of overlooking. Therefore, the scheme was amended to remove them and replace with a hi-level window and a balcony was inserted on the south elevation so that the occupants of the new dwelling would have views over their own garden.

4.3.3 By reason of its siting, it is not considered that there would be any significant effect by way of loss of light.

4.4 Plot 6

4.4.1 The principal properties that are likely to be affected by the proposal are nos. 116, 118 and 118a High Street.

4.4.2 Concerns have been raised with regards to the siting of plot 6 in relation to the existing properties along High Street. The main two storey dwellinghouse has been set off away from the shared boundaries with nos. 118 & 118a and will be 17.5m away with a single storey double garage (10.5m away) and double driveway physically separating it. A first floor window is proposed facing these properties but as this serves an en-suite it will be obscurely glazed to protect the privacy of the future occupants. However, given the physical separation of the buildings, any overbearing is not considered to have a significant adverse impact on balance.

4.4.3 Furthermore, it is considered that there would be no loss of light or privacy to these existing residents as a result of the development.

4.5 Summary

4.5.1 The proposed development would not result in any significant adverse impact upon any nearby residential property due to siting and design of each plot. It is judged there is suitable spacing between the proposed dwellings and all surrounding adjacent properties.

5. **Highway Considerations**

5.1 The site lies within the 30mph speed limit and the level of visibility available at the access is considered acceptable by the Council's Highways Officer as is the separation between the access and the junction with Townshott.

5.2 The existing access is shown to be widened to create an extended dropped kerb footway/verge crossing and the internal access road is shown to be laid out as a shared surface with provision made within the site to accommodate turning for the refuse vehicle and the fire applicant. Furthermore, the on-site parking provision is deemed acceptable in highway terms.

5.3 The proposed development in this location has the potential to generate 40/45 additional traffic movements per day. Given that the means of access, the internal road layout and the off-street parking provision are deemed acceptable, it is considered that these can be satisfactorily accommodated on the local road network and the proposal is unlikely to have any adverse highway impact, once completed. Conditions have been suggested for matters including surfacing and garage accommodation usage.

6. Other Considerations

6.1 a) Flood Risk and Drainage

- 6.1.1 Concerns have been raised within the representations received and from the Council's SuDS Team and I.D.B with regards to the discharge of surface water. As such a condition will be attached to any planning permission granted for the submission of a Surface Water Drainage Strategy prior to the commencement of works on site.

6.2 b) Ecology Considerations

- 6.2.1 The submitted ecological appraisal has identified a bat roost in the property to be demolished and also the potential interest for reptiles and Great Crested Newts (GCN) on site. It is accepted that an area of meadow land to the south of the application site would be available to satisfy potential mitigation measures for compensatory habitat for GCN and reptiles.
- 6.2.2 In the case of the bat roost, the applicant commissioned further tests and the DNA results back from the bat droppings confirm that there are brown long eared bats roosting. There is also potential for crevice dwelling bat species such as pipistrelles but their presence did not show up in the DNA results.
- 6.2.3 As part of the bat mitigation strategy, suitable measures into the new development including roof space access for bats and integrated bat boxes/tubes will be incorporated. As such supporting plans were submitted to set out the location of such measures.
- 6.2.4 Therefore, the Council's Ecology Officer is happy that the development will deliver a net gain for biodiversity in line with the NPPF and the Greensand Ridge Nature Improvement Area aspirations.

6.3 c) Tree Considerations

- 6.3.1 The application included a detailed Arboricultural Impact Assessment and Method Statement that identified trees on and off site that could potentially be affected by the proposal or influence layout and design. The information indicates that there would be no need to remove any trees to allow development and layout should be such that future issues with trees would be avoided.
- 6.3.2 The Method Statement and Tree Protection Plan indicate all the steps required with regards to retaining trees in good order throughout development, it also indicates position of tree protection fencing. These steps and details should be followed throughout the development process as indicated.

6.4 d) Fossey Grove Development

- 6.4.1 Reference has been made to this development within the submission and representations in respect of how it differs from the proposal. However, this was an allocated site and therefore subject to different planning policies at the application stage.
- 6.4.2 Notwithstanding this, the development did create a built environment away from the High Street and the proposal under consideration within this application is similar. This is a material consideration in terms of the potential harm.

6.5 Human Rights issues

It is the officers understanding that the proposal would raise no Human Rights issues.

6.6 Equality Act 2010

It is the officers understanding that the proposal would raise no issues under the Equality Act 2010.

7. Conclusion and the Planning Balance

7.1 The provision of six houses would not contribute significantly to the supply of housing and therefore provide limited benefit in this regard.

7.2 However, the application site is partially within and adjacent to the settlement envelope boundaries to the north. Clophill is a large village which provides limited employment opportunities as a primarily residential settlement with a number of community facilities and local services but is accessible to strategic transport links.

7.3 The development would not be out of scale or character with other housing in the area or otherwise harm the rural character of the village or the Conservation Area. The proposal is considered to be acceptable in terms of amenity, highway, conservation, and other environmental impacts. In the specific circumstances of the site, there are no significant and demonstrable adverse impacts which would arise from the development.

7.4 It is considered that the proposal is considered to be a sustainable form of development having regard to economic, social and environmental roles. The development would not cause any significant or demonstrable harm and therefore planning permission should be approved in this instance.

Recommendation:

That Planning Permission be APPROVED subject to the following:

RECOMMENDED CONDITIONS / REASONS

- 1 The development hereby permitted shall begin not later than three years from the date of this permission.

Reason: To comply with Section 91 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 take place until details of the method of disposal of foul and surface water drainage, which shall demonstrate the proposed method of surface water drainage and management of flood risk, have been submitted to and agreed in writing by the Local Planning Authority, including any land drainage system. Thereafter no part of the development shall be occupied or brought into use until the approved drainage scheme has been implemented.**

(Please see Notes to Applicant for further guidance.)

Reason: To ensure that adequate foul and surface water drainage is provided and that existing and future land drainage needs are protected. (Section 10, NPPF). This is a pre-commencement condition as drainage systems need to be installed prior to commencement of the dwellings.

- 3 No development shall take place until a written scheme of archaeological investigation; that includes provision for post excavation analysis and publication, has been submitted to and approved in writing by the Local Planning Authority. The development hereby approved 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 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.
(Section 12, NPPF)**

- 4 No development shall take place until details of the junction between the proposed internal access road and the highway have been submitted to and approved in writing by the Local Planning Authority and no dwelling shall be occupied until that junction has been constructed in accordance with the approved details.**

**Reason: In order to minimise conditions of danger, obstruction and inconvenience to users of the highway and of the proposed estate road.
(Section 4, NPPF). This is a pre-commencement condition as a safe access to the site needs to be agreed prior to the construction of the dwellings.**

- 5 No development shall take place for the new dwellings, notwithstanding the details submitted with the application, until details and samples of the materials to be used for the external walls and roofs of the proposed buildings shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out only in accordance with the approved details.**

**Reason: To ensure that the proposed development/work is carried out in a manner that safeguards the historic character and appearance of the Clophill Conservation Area. This is a pre-commencement condition as materials need to be agreed before construction of the dwellings begins.
(Section 12, NPPF)**

- 6 No occupation of any dwelling hereby approved shall take place until a landscaping scheme to include all hard and soft landscaping and a scheme for landscape maintenance for a period of five years following the implementation of the landscaping scheme have been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented by the end of the full planting season immediately following the completion and/or first occupation of any separate part of the development (a full planting season means the period from October to March). The trees, shrubs and grass shall subsequently be maintained in accordance with the approved landscape maintenance scheme and any which die or are destroyed during this period shall be replaced during the next planting season.

Reason: To ensure an acceptable standard of landscaping. (Sections 7 & 11, NPPF)

- 7 **All new doors and windows shall be timber and detailed drawings at a scale of 1:10 of all new doors (including garage doors) and windows shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of any development. The works shall be carried out in strict accordance with the approved details.**

**Reason: To ensure that the proposed development/work is carried out in a manner that safeguards the historic character and appearance of the Clophill Conservation Area. This is a pre-commencement condition as construction details need to be agreed before construction of the dwellings begins.
(Section 12, NPPF)**

- 8 Notwithstanding the approved plans, all new rainwater goods shall be of black painted [cast iron/aluminium] and shall be retained thereafter.

Reason: To ensure that the proposed development/work is carried out in a manner that safeguards the historic character and appearance of the Clophill Conservation Area.
(Section 12, NPPF)

- 9 Prior to the occupation of the first dwelling, a scheme shall be submitted for the approval in writing by the Local Planning Authority indicating the positions, design, materials and type of boundary treatment to be implemented. The boundary treatment shall be completed in accordance with the approved scheme before the building is occupied and be thereafter retained.

Reason: To ensure that the proposed development/work is carried out in a manner that safeguards the historic character and appearance of the Clophill Conservation Area and in the interests of amenity of existing and future residents. (Section 12, NPPF)

- 10 The proposed vehicular access shall be surfaced in bituminous or other similar durable material (not loose aggregate) and any new edging's to the access shall be in granite setts and not in concrete. Arrangements shall be made for surface water drainage from the site to be intercepted and disposed of separately so that it does not discharge into the highway.

Reason: To avoid the carriage of mud or other extraneous material or surface water from the site into the highway so as to safeguard the interest of highway safety and to ensure that the proposed development/work is carried out in a manner that safeguards the historic character and appearance of the Clophill Conservation Area. (Sections 4 & 12, NPPF)

- 11 Before the development hereby permitted is first occupied or brought into use, the scheme for parking, garaging and manoeuvring shown on Drawing No 17560/1002 shall be laid out, drained and surfaced in accordance with details previously submitted to and approved in writing by the Local Planning Authority and those areas shall not thereafter be used for any other purpose.

Reason: To enable vehicles to draw off, park and turn clear of the highway to minimise conditions of danger, obstruction and inconvenience to users of the adjoining highway. (Section 4, NPPF)

- 12 Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 1995, or any amendments thereto, no doors or gates shall be affixed to the front of the car ports and those car ports shall not be used for any purpose, other than as a parking space, unless permission has been granted by the Local Planning Authority on an application made for that purpose.

Reason: To retain off-street parking provision and thereby minimise the potential for on-street parking which could adversely affect the convenience of road users. (Section 4, NPPF)

- 13 All works to or affecting trees on or adjoining the site shall be carried out in accordance with the relevant recommendations of BS3998 2010.

Reason: To safeguard the existing trees on the site in the interests of visual amenity.
(Sections 7 & 11, NPPF)

- 14 The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers 17560/100, 17560/102, 17560/103, 17560/104, 17560/105, 17560/106, 17560/107, 17560/108, 17560/109, 17560/110, 17560/111, 17560/112, 17560/1002, 17560/1003, 17560/1004, 17560/1006, 17560/1007, PR120879-01 Tree Reference Plans 1 & 2, PR120879 66 Bat Mitigation Strategy Plan, Ecological Appraisal, Archaeological Field Evaluation & Heritage Statement, Arboricultural Impact Assessment & Method Statement, Design & Access Statement, Planning Statement, Supporting Statement

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

INFORMATIVE NOTES TO APPLICANT

1. This permission relates only to that required under the Town & Country Planning Acts and does not include any consent or approval under any other enactment or under the Building Regulations. Any other consent or approval which is necessary must be obtained from the appropriate authority.
2. The application states the intention is to discharge surface water to the mains sewer. Anglian Water's maps show there are no adopted surface water sewers in the vicinity and we therefore assume the intention is to dispose of surface water to the public foul sewer – in which case we do not find the proposal acceptable (see attached Anglian Water asset map).

Connections to the foul sewer for surface water discharge are considered unsustainable and should be avoided in all cases, as this can increase the risk of surcharge and flooding from the sewer. We therefore strongly object to a proposal to dispose of surface water to the public foul sewer.

All developments must comply with the drainage hierarchy set out in Part H of the Building Regulations, which the application fails to do.

H3 - Rainwater drainage

(1) Adequate provision shall be made for rainwater to be carried from the roof of the building.

(2) Paved areas around the building shall be so constructed as to be adequately drained.

(3) Rainwater from a system provided pursuant to sub-paragraphs (1) or (2) shall discharge to one of the following, listed in order of priority:

(a) an adequate soakaway or some other adequate infiltration system; or, where that is not reasonably practicable,

(b) a watercourse; or, where that is not reasonably practicable,*

*(c) a sewer**.*

**Any connection to a watercourse or sewer must not exceed greenfield run off rates with appropriate controls provided on site to limit run off.*

***public surface water sewer.*

We ask that an alternative discharge be investigated in accordance with the above hierarchy.

We also note that the site is located within an area at risk of the 1:1000 surface water event. The design and layout of the development must acknowledge existing drainage patterns on site and those off site that the proposed development has the potential to affect.

We expect details to demonstrate the proposed method of surface water discharge and management of flood risk to be provided. This should be in accordance with the Non-statutory technical standards for sustainable drainage systems (Defra, 2015) and the Central Bedfordshire Sustainable Drainage Guidance (CBC, Adopted April 2014 Updated May 2015).

3. The applicant is advised that no works associated with the construction of the vehicular access should be carried out within the confines of the public highway without prior consent, in writing, of the Central Bedford shire Council. Upon receipt of this Notice of Planning Approval, the applicant is advised to contact Central Bedford shire Council's Highway Help Desk, Tel: 0300 300 8049 quoting the Planning Application number. This will enable the necessary consent and procedures under Section 184 of the Highways Act to be implemented. The applicant is also advised that if any of the works associated with the construction of the vehicular access affects or requires the removal and/or the relocation of any equipment, apparatus or structures (e.g. street name plates, bus stop signs or shelters, statutory authority equipment etc.) then the applicant will be required to bear the cost of such removal or alteration.
4. The applicant is advised that the requirements of the New Roads and Street Works Act 1991 will apply to any works undertaken within the limits of the existing public highway. Further details can be obtained from the Central Bedford shire Council's Highway Help Desk, Tel: 0300 300 8049.
5. The applicant is advised that parking for contractor's vehicles and the storage of materials associated with this development should take place within the site and not extend into within the public highway without authorisation from the highway authority. If necessary the applicant is advised to contact Central Bedford shire Council's Highway Help Desk on 03003008049. Under the provisions of the Highways Act 1980 the developer may be liable for any damage caused to the public highway as a result of construction of the development hereby approved.

Statement required by the Town and Country Planning (Development Management Procedure) (England) Order 2015 - Part 6, Article 35

The Council acted pro-actively through positive engagement with the applicant 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.