

## Item No. 12

<b>APPLICATION NUMBER</b>	<b>CB/14/04532/FULL</b>
<b>LOCATION</b>	<b>Toddington Manor, Park Road, Toddington, Dunstable, LU5 6HJ</b>
<b>PROPOSAL</b>	<b>Demolition of existing buildings (education/leisure use further to permission reference SB/TP/93/0854) and erection of an ancillary leisure building to Toddington Manor (for C3 use)</b>
<b>PARISH</b>	<b>Toddington</b>
<b>WARD</b>	<b>Toddington</b>
<b>WARD COUNCILLORS</b>	<b>Cllrs Costin &amp; Nicols</b>
<b>CASE OFFICER</b>	<b>Judy Self</b>
<b>DATE REGISTERED</b>	<b>09 December 2014</b>
<b>EXPIRY DATE</b>	<b>03 February 2015</b>
<b>APPLICANT</b>	<b>Trustees of the Toddington No.2 Settlement c/o Baccatta Trustees Ltd</b>
<b>AGENT</b>	<b>Rural Solutions Ltd</b>
<b>REASON FOR COMMITTEE TO DETERMINE</b>	<b>Large scale development within the Green Belt (Departure)</b>
<b>RECOMMENDED DECISION</b>	<b>Full Application – Approval recommended</b>

### Summary of Recommendation

Toddington Manor is a Grade II Listed Building set within its own parkland and outside any settlement envelope. The development is within the South Bedfordshire Green Belt and an Area of Great Landscape Value (AGLV). However this is a previously developed site and the single building would replace a number of derelict buildings. The modern concrete building would be clad in timber and a green (Sedum) roof would cover the entire building. The building would be set within a modified and enhanced landscape setting and is not considered to have a greater impact on the openness of the Green Belt or Area of Great Landscape Value, having regards to paragraph 89 of the NPPF and Policy 36 of the emerging Development Strategy for Central Bedfordshire.

There will be no adverse impact upon the setting of the Grade II Listed Toddington Manor or the parkland associated with Toddington Manor. There will be no adverse impact on the residential amenity of any neighbouring property by reason of loss of light, privacy or overbearing impact in accordance with Policy BE8 of the South Bedfordshire Local Plan Review Policies. The proposed development is acceptable with regards to highway safety in accordance with the Local Transport Plan: Appendix F - Parking Standards.

### Site Location:

Toddington Manor is located north-west of Toddington village and due east of the M1. Harlington Road connects the village with the M1 and the application site is accessed via Park Road, which is just off Harlington Road.

The Manor is a Grade II Listed Building set within its own parkland. The site is within the South Bedfordshire Green Belt and an Area of Great Landscape Value.

Behind the proposed site the land slopes up to form a hill. Opposite, directly north of the site and beyond a bank of trees, the topography drops down to the cricket field and pavilion.

Pre-application discussions have taken place.

### **The Application:**

Demolition of the existing leisure and educational buildings and erection of an ancillary leisure building for Toddington Manor (C3 use). The building makes provision for the following: tennis court, spa & swimming pool, art exhibition space and car & helicopter storage.

- The existing floorspace at the application site is 2794 sqm (5 large buildings; 2 sheds and 1 stable all to be demolished). The proposed floorspace is 2810 sqm with a basement of 796 sqm.
- The existing hardstanding areas at the application site is 3600 sqm (to be removed). The proposed hardstanding will be 2141 sqm, of which 1366 is grasscrete.
- The proposed leisure building measures 7.5m in height (in-line with the cricket pavilion spire) and would not exceed the ridge height of the of the original buildings.

The application was accompanied by the following documents: Planning Statement; Design & Access Statement and a Landscape Statement & Archaeology statement.

### **RELEVANT POLICIES:**

#### **National Planning Policy Framework (2012)**

7: Requiring good design

9: Protecting Green Belt Land

11: Conserving and enhancing the natural environment

12: Conserving and enhancing the historic environment

#### **South Bedfordshire Local Plan Review Policies**

Policy SD1 - Sustainability principles

Policy BE7 - Historic parks and gardens

Policy BE8 - Design considerations

Policy NE3 - Area of Great Landscape Value

Nb. (In accordance with Annexe 1: "Implementation", paragraph 215, of the National Planning Policy Framework, policies BE8 is considered to be broadly consistent with the NPPF and have therefore been given significant weight in the determination of this application.

#### **Emerging Development Strategy for Central Bedfordshire**

Policy 1: Presumption in favour of Sustainable Development

Policy 36: Development in the Green Belt

Policy 43: High Quality Development

Policy 45: The Historic Environment

Having regard to the National Planning Policy Framework, weight is given to the policies contained within the Development Strategy for Central Bedfordshire, which is consistent with the NPPF. The draft Development Strategy was submitted to the Secretary of State on 24th October.

### Technical Planning Guidance

- Central Bedfordshire Local Transport Plan: Appendix F : Parking Strategy (Adopted in October 2012 by the Executive for Development Management Purposes)

### Planning History

No planning history specific to the site

### Representations: (Parish & Neighbours)

Toddington Parish Council	No objection
Adjacent Occupiers	None to date. Any comments subsequently received will be reported on the Late Sheet and at Committee.

Site Notice Posted 21/12/14  
Advertised 2/1/15

### Consultations/Publicity responses

Comments from the Conservation Officer	<p>Pre application advice given for this proposal which was supportive of the demolition of the existing buildings which are considered not to make a positive contribution.</p> <p>The replacement leisure building although contemporary in design is considered unlikely to affect the setting of a Grade II Listed Toddington Manor.</p> <p>The history of the historic parkland is not a designed landscape and has retained its field and woodland patterns from sixteenth century. The proposed site is not visible from any public rights of way and therefore the impact on the historic parkland is considered to be minimal.</p>
Comments from the Tree & Landscape Officer	<p>I have examined the plans and documents relating to this application, and on the basis of the information provided have no objections subject to a standard landscape planting condition being imposed.</p> <p>It should be advised that the indicative planting, as illustrated on the site plan, shows Ash being planted. Such trees are presently covered by a movement restriction order in response to <i>Chalara (ash dieback)</i> disease, and should therefore be omitted from any future scheme.</p> <p>I also suggest that a tree planting mixture is used that should be</p>

reasonably diverse to meet the challenges of climate change, yet be species which reflect the parkland surroundings, and a size that maintains a sense of scale and proportion to the characteristic parkland setting.

Comments from the  
Landscape Officer

I have no objections to the proposals on landscape grounds - landscape character and visual impact. The inclusion of a green roof linked to a SuDS system are really positive features.

Comments from the  
Archaeology Officer

The proposed development site lies within an area of gardens and other features (HER 97) associated with Toddington Manor (HER 5313, LB 967/8/362: Grade II) and under the terms of the *National Planning Policy Framework* (NPPF) these are heritage assets with the archaeological interest. Toddington Manor is a designated heritage asset with architectural interest.

Toddington Manor (HER 5313, LB 967/8/362: Grade II) as it stands today is early post medieval in date with a number of 18th, 19th and 20th century additions, and it lies within grounds that were landscaped in the post-medieval period. The remains of the landscaping, as well as the structures associated with the manor before the landscaping, have been observed on air photos and some are recorded on maps dating from the 16th to the 19th centuries. Many of the cropmarks visible on air photos can be identified as features appearing on a map of the manor dating to 1581, for example the buildings and yard of what may have been a farmstead serving the manor can be seen as both cropmarks and earthworks on air photos. It has also been suggested that there may be a deserted medieval village on the site. A gateway relating to the manor is no longer extant (HER 957) neither is the medieval manor house (HER 5313).

This application is accompanied by a document entitled *Toddington Manor Bedfordshire: Landscape and Archaeology Context for New Building Proposals* (DCLA, November 2014) and suggests that it has been prepared to address comments made by Archaeology Team on pre-application CB/14/00080/PAPC. The document represents a partial assessment of the history of the site and seems to largely based on the review of historic map evidence. It does not however represent an archaeological desk-based assessment, which is actually what was requested at the pre-application stage. The document concludes that the historic maps do not suggest that any archaeological remains survive at this location. Unfortunately, I cannot agree with the conclusions drawn by this document. Archaeological remains are features which are most commonly found beneath the ground and which can date from the Palaeolithic through to the modern period, this means that the majority of the remains recorded by excavation do not date to the historic period and do not appear on maps. The Agas map of 1581 which seems to be the primary source for the *Toddington Manor Bedfordshire: Landscape and Archaeology Context for New Building Proposals* is a valuable piece of early post medieval mapping, nevertheless it remains a subjective interpretation of what the landscape looked like at this time.

Therefore, one should be wary of using it to claim that no archaeological remains relating to the manor complex will survive at the site.

In the wider area there are a number of Historic Environment Record (HER) entries that relate to the Saxon, medieval and post medieval landscape, which indicate that this area has archaeological potential for a number of reasons. If an archaeological desk-based assessment had been undertaken for this development, the known archaeological resource would have been picked up.

This application proposes the demolition of the existing buildings (largely agricultural barns and leisure buildings) and the erection of a new leisure complex related to Toddington Manor. The new complex will include a basement.

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). Policy 45 of the *Draft Development Strategy for Central Bedfordshire* (pre-submission version, June 2014) echoes this and also requires all developments that affect heritage assets with archaeological interest to give due consideration to the significance of those assets and ensure that any impact on the archaeological resource which takes place as a result of the development is appropriately mitigated.

The erection of the existing buildings at this site may have had some impact upon the surviving archaeological resource. However, recent research elsewhere in Bedfordshire has demonstrated that while such remains may have suffered some truncation, they have not always been entirely destroyed. The investigation of rural Saxon and medieval settlements to examine diversity, characterise settlement forms and understand how they appear, grow, shift and disappear; (Wade 2000, 24-25, Oake 2007, 14 and Medlycott 2011, 70), locating and understanding the development of manorial sites that may not have been enclosed by features such as moats (Edgeworth 2007, 100), and gathering data about the origins and history of parks and gardens, identifying their surviving features and considering the social and economic aspects of designed landscapes (Gilman, Gould and Green 2000, 36-39 and Oake et al 2007, 15-16) are all local and regional archaeological research objectives.

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 the

archaeological heritage assets. This will be achieved by the investigation and recording of any archaeological deposits that may be affected by the development; the post-excavation analysis of any archive material generated and the publication of a report on the works. In order to secure this, please attach the specified condition to any permission granted in respect of this application.

This request is in line with the requirements of Chapter 12 of the NPPF and policy 45 of the *Draft Development Strategy for Central Bedfordshire* (pre-submission version, June 2014).

Comments from the Ecology Officer

Having read through the submitted documents I have no objections to the proposal for the demolition of existing buildings and the construction of a leisure building. However, given the varied ecological interest in the site a number of requirements will need to be met to prevent harm to protected species and to ensure a net gain for biodiversity is delivered.

The impact on bats from the proposals are unclear, 7.15 of the Phase 1 survey and bat inspection report states that bats are likely to be utilising the disused commercial farm buildings for foraging and night time feeding and that buildings would appear to be occupied by a small number of bats at any time of year. 8.4 goes on to state that damage and destruction of bat roosts can only occur under an EPS licence which will require a mitigation scheme.

The separate November 2014 GCN report details necessary mitigation and compensation to support a licence application to allow works to the farm buildings which could impact on the known GCN pond on the site. This report details a number of additional enhancements to be included with the proposals which are welcomed. These include the provision of a green roof on the new leisure building and additional meadow habitat. Similar details on measures to support a licence application for the potential loss of bat roosts would also be required.

English Heritage

No objection

Comments from the Highways Officer

The proposed development is described as an ancillary residential building, for the benefit of the residents of the Manor House and is unlikely to give rise to a material change in traffic movements to and from the site. Hence the proposal is unlikely to have an adverse impact on the local road network once completed.

I would suggest that a condition is imposed regarding the submission of details for preventing site debris from being deposited on the public highway.

Comments from the Rights of Way Officer

I have no objections to this proposal and my response to the letter from Ridge consultants dated 14<sup>th</sup> January 2015 and DCLA notes

and accompanying updated drawings) is as following:

- Planting: yes, this seems fine. I was just checking the position of the new hedge.
- Drainage and cable: again this is fine – useful clarification
- Deposited soil: what is proposed is acceptable to me. I welcome the fact that the deposition site has been adjusted to avoid the footpaths.

Public protection	Any comments received will be reported on the 'late sheet' and at committee
Cranfield Airport	Any comments received will be reported on the 'late sheet' and at committee
Airfield Environment office, London Luton Airport	Any comments received will be reported on the 'late sheet' and at committee

## Determining Issues

The main considerations of the application are;

1. The principle of development and the visual appearance and impact upon the Green Belt and Area of Great Landscape Value (AGLV)
2. Impact upon the site and setting of the listed building
3. Impact on neighbouring amenity
4. Other issues

## Considerations

### 1. ***Principle of Development***

#### Protecting the openness of the Green Belt and the Area of Great Landscape Value (AGLV)

The proposal site is located within the green belt and thus has implications on the Green Belt policy. Paragraph 9 of the NPPF and echoed in Policy 36 of the emerging Development Strategy states that there is a presumption against inappropriate development in the Green Belt and planning permission will only be granted where the very special circumstances outweigh harm to the Green Belt.

The proposal comprises a new Leisure Building within the larger existing grounds of Toddington Manor. The proposed building would provide ancillary services to the Manor House. The building makes provision for the following: tennis court, spa & swimming pool, art exhibition space and car & helicopter storage.

A key consideration for proposed development in the Green Belt and its impact on openness is the potential intensity of activity associated with it. The existing (extant) use of the application site provides for a potentially very intensive use, educational and leisure use. The proposed use is for an ancillary leisure building to Toddington

Manor. It is a private residential use and the applicants state that the building would contain the low intensity activity within its walls; other than the occasional visitation by a single helicopter which would land on the adjacent landing area as identified on plan no. 131543-A-115 (A).

It is located in the south part of the land, directly to the south of the Cricket Pitch and north of the Manor Lodge/Gatehouse and replaces existing low quality asbestos bearing contaminant buildings which are derelict.

The justification given for allowing the demolition of the existing buildings and the erection of a the building for leisure purposes ancillary to Toddington Manor is Paragraph 89 of the National Planning Policy Framework:

*Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

Previously Developed Land within the National Planning Policy Framework is defined as:

*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.*

It is accepted that this land is occupied currently by permanent structures and planning permission was approved on part of the site for educational and leisure purposes and for a fork lift display area and storage. It is therefore considered to be a brownfield site under the definition within the National Planning Policy Framework.

On deciding whether the proposal would, 'have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development', the proposed building would consolidate the existing footprint of a number of buildings into one building and seeks to use the natural fall of the site from south to north to sink the building into the landscape.

Whilst it is acknowledged that the new building would be extremely large in scale, it



would be no higher than the current buildings and would be set within a modified and enhanced landscape setting. The modern concrete building would be clad in timber with wooden louvered shutters and panels to the windows and doors. A green (Sedum) roof covers the entire area of the building to minimise the hard-standing landscape.

In policy terms the proposal is considered to comply with Paragraph 89 of the NPPF and Policy 36 of the emerging Development Strategy. The proposal is acceptable to the Council's Landscape Officer and as such the proposal is not considered to harm the openness of the Green Belt or the Area of Outstanding Landscape Value.

**2. *Impact upon the site and setting of the listed building***

Toddington Manor House is a Grade II listed building set within its own parkland. The site is some distance from the conservation area within the centre of Toddington.

No objection has been raised by the Conservation Officer to the removal of the large utilitarian buildings with a single large timber clad leisure building. The replacement leisure building although contemporary in design is not considered to affect the setting of a Grade II Listed Toddington Manor.

English Heritage have not raised an objection and the proposal is therefore considered to preserve the setting of the listed building and the parkland associated with Toddington Manor.

**3. *Impact on residential amenity***

Toddington Manor stands in isolation a considerable distance from the nearest residential property. There would therefore be no significant harm to residential amenity.

**4. *Other issues***

Tree & Landscape Officer

No objection has been raised by the Tree & Landscape Officer (subject to the specified pre commencement condition which requires the submission of a landscaping scheme) and as such the proposal is considered to acceptable in this regard.

Landscape Character & Area of Great Landscape Value

Discussions have taken place during the determination of the application. No objection has been raised by the Landscape Officer (subject to a pre-commencement 'materials' condition) and as such the proposal is considered to acceptable in this regard.

Archaeology

No objection has been raised by the Archaeology Officer (subject to the specified pre commencement condition which requires the submission of a written scheme of archaeological investigation) and as such the proposal is considered to acceptable in this regard.

Ecology

No objection has been raised by the Ecology Officer (subject to a pre commencement condition) and as such the proposal is considered to be acceptable in this regard.

### Highway Safety

Toddington Manor is accessed off Park Road and the tarmac driveway will serve the proposed new building as well as the Manor house.

No objection has been raised by the Highways Officer (subject to a pre commencement condition requiring a method statement which would prevent site debris from being deposited on the public highway) and as such the proposal is considered to be acceptable in this regard.

### Public rights of Way

Two public footpaths cross through the Toddington Manor Parkland and discussions have taken place during the determination of the application. No objection has been raised by the Public Rights of Way Officer and as such the proposal is considered to be acceptable in this regard.

### Human Rights issues

The development has been assessed in the context of the Human Rights and would have no relevant implications.

### Equality Act 2010

The development has been assessed in the context of the Equality Act 2010 and would have no relevant implications.

### Personal use of a helicopter

The use of a helicopter for private / personal use does not require planning consent. However, landing sites which are located in built up areas may require special permission from the Civil Aviation Authority because of safety regulations. Cranfield and London / Luton Airports have been consulted during the determination of the application.

### Notifying the Secretary of State

Local planning authorities must inform the Secretary of State if they intend to approve an application in the Green Belt where the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more. The Secretary of State has 21 days from that date in which to decide whether or not to call in the application. The local authority cannot grant planning permission until that time is up unless notified before the expiry of 21 days that the application will not be called in.

### In summary

The development is within the South Bedfordshire Green Belt and an Area of Great Landscape Value. However this is a previously developed site and the single building would replace a number of derelict buildings. The timber clad building, under a green (Sedum) roof would be set within a modified and enhanced landscape setting. Given the topography and location of the site the building would not have a greater impact on the openness of the Green Belt or Area of Great Landscape Value, having regards to paragraph 89 of the NPPF and Policy 36 of the emerging Development Strategy for Central Bedfordshire.

There will be no adverse impact upon the setting of the Grade II Listed Toddington Manor. And there will be no adverse impact on the residential amenity of any neighbouring property by reason of loss of light, privacy or overbearing impact in accordance with BE8 of the South Bedfordshire Local Plan. The proposed development is acceptable with regards to highway safety in accordance with the Local Transport Plan: Appendix F - Parking Standards.

### **Recommendation**

That approval is recommended 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, notwithstanding the details submitted with the application, until the following details have been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details.**

- **Samples of materials for external finishes - especially concrete and timber**
- **Exterior lighting character and location - if applicable**
- **Specification for restoration of area receiving spoil.**

**Reason: To control the appearance of the building in the interests of the visual amenities of the locality.**

- 3 **No demolition or development shall take place until a written scheme of archaeological investigation; that includes 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: To record and advance understanding of the heritage assets with archaeological interest which will be unavoidably affected as a consequence of the development.**

- 4 **No development shall commence until details of a method statement to prevent and deal with site debris from being deposited on the public highway have been submitted to and approved in writing by the Local**

**Planning Authority. The approved method statement shall be implemented throughout the construction works and until the completion of the development.**

**Reason: In the interests of highway safety and to prevent the deposit of mud or other extraneous material on the highway during the construction period.**

- 5 **No development 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 use 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.**

- 6 **No development shall take place until full details of mitigation, conservation and/or enhancement measures for protected species have been submitted to and approved in writing by the Local Planning Authority. These measures shall include:**
- **Species surveys to determine the possible presence of particular protected species previously specified by the Local Planning Authority, where necessary these will be required to inform an EPS licence application.**
  - **details of appropriate mitigation measures and contingency plans should such a protected species be found to be present and either (i) preparing for breeding, (ii) in the process of breeding or (iii) rearing young;**
  - **mechanisms to enhance identified existing wildlife habitats through the development process.**

**The works shall be implemented in accordance with the approved details.**

**Reason: To ensure all impacts from development on biodiversity are taken into account and mitigated.**

- 7 **The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:**

### **Proposed**

131543-A-100 (site location); 131543-A-110 (Demolition plan); 131543-A-115 A (Site plan); 131543-A-118 A (Basement plan); 131543-A-119 A (Ground floor plan); 131543-A-120 A (East & West elevation); 131543-A-121 B (South elevation); 131543-A-122 B (North elevation); 131543-A-125 (section).

### **Existing**

13346-500-01T (Site survey); 13346-500-01T-S1 (Topographical survey 1 of 2); 13346-500-01T-S2 (Topographical survey 2 of 2); 13081-100-20GF (barn 1 survey); 13081-100-20GF (barn 2 survey); 13081-100-20GF (barn 4 survey); 13081-100-20GF (barn 3&5 survey); 13081-100-21E (barn 1 elevations); 13081-100-21E (barn 2 elevations); 13081-100-21E (barn 3 elevations); 13081-100-21E (barn 3 elevations); 13081-100-21E (barn 5 elevations)

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

### **Notes to Applicant**

1. 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 Street Works Co-ordinator, Bedfordshire Highways, by contacting the Highways Helpdesk 0300 300 8049.
2. Note from the Tree & Landscape Officer

Ash trees are presently covered by a movement restriction order in response to Charlara (ash dieback) disease, and should therefore be omitted from any landscaping scheme (re: condition 5). It is also recommended that a tree planting mixture is used that should be reasonably diverse to meet the challenges of climate change, yet be species which reflect the parkland surroundings, a size that maintains a sense of scale and proportion to the characteristic parkland setting.

### **Statement required by the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2012 - Article 31**

Planning permission has been granted for this proposal. 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) (Amendment No. 2) Order 2012.

## DECISION

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