

# **PLANNING STATEMENT**



**Proposal:** Demolition of Existing Building and Construction of 44 flats and associated works

**Site:** AutoService (Pontypool) Limited, Rockhill Road, Pontypool, NP4 8AN

Date: August 2017



## **CONTENTS**

- 1.0 Introduction
- 2.0 Site Description
- 3.0 Planning Designations
- 4.0 Proposal
- **5.0** Planning Policy Context
- 6.0 Planning Appraisal
- 7.0 Conclusion

**Appendix A Pre-application advice** 



#### 1.0 Introduction

- 1.1 This Planning Statement has been prepared by LRJ Planning Ltd on behalf of Mr Skinner to accompany the full planning application for the demolition of existing buildings and the erection of 44 flats at Pontypool Auto Service, Rockhill Road, Pontypool, NP4 8AN.
- 1.2 This Planning Statement describes the proposals, related key material considerations in determining the application, and benefits which will be delivered through providing a comprehensive redevelopment of the site and much needed housing. Furthermore it reviews and demonstrates compliance with the approved relevant development plan policies and national planning policy.
- 1.3 This statement should be read in conjunction with the following plan and documents that accompany the application and comprise:
  - Application form and certificates
  - Site location plan
  - Existing site plan
  - Proposed site plan
  - 3D Visuals
  - Existing floor plans
  - Existing Elevations
  - Proposed floor plans
  - Proposed Elevations
  - Design and Access Statement prepared by Richard Andrews Architects
  - Flood Consequences Assessment and Modelling Report prepared by Hydrock
  - Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan prepared by Treescene
  - Phase 1 Habitat Survey by TerraAqua Ecology
  - Bat Survey and Otter Survey Report prepared by TerraAqua Ecology



- Preliminary Investigation Report prepared by Ian Farmers Associates
- Noise Assessment prepared by Acoustics and Noise Limited

## 2.0 Site Description

2.1 The application site comprises a site area of 0.32 hectares. The site is currently occupied by Pontypool Auto Service Centre, which carries out vehicle repairs, MOT's, servicing and sales. The operation is undertaken within an existing two-storey gabled building that fronts Rockhill Road, with its side elevation facing Fountain Road. The exterior of the building is finished in red brick and a cement roof. The existing built form has a footprint of 1,290sqm. A yard area is located to the south eastern corner of the site, which facilitates vehicular access to the workshop.

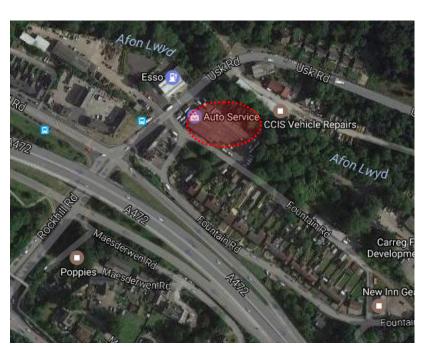


Figure 1 – Aerial photograph of application site



Figure 2 – View of existing building fronting Rockhill Road



Figure 3 – View of rear of building from Fountain Road





2.2 A group of terraced properties, which are Grade II Listed Buildings are sited to the 12.0m to the west and beyond this is the A4042. To the north west and opposite the site is an Esso garage, while the Afon Lwyd flows to the north east. To the south is an area of green open space and beyond this are the rear gardens of dwellings known as Nos.42 to 52 Fountain Road.

## 3.0 Planning Designations

- 3.1 The Site is not subject to any designations as defined by the Council's adopted Policies Map.
- 3.2 The Site is not within, or immediately adjacent to, designations for valued landscapes, such as local landscape designations, AONBs or National Parks.
- 3.3 The Site lies within Flood Zone C2, but extensive modelling has been undertaken that demonstrates that the site falls within Flood Zone B. Further commentary will provided at Section 6 of this Statement on flood risk.
- 3.4 A group of Grade II listed buildings are sited to the west, and Pontypool Park, a registered Historic Park and Garden, is sited to the north.

## 4.0 Proposal

- 4.1 Full planning permission is sought for the demolition of the existing buildings and the creation of 44 flats and associated works. The flats will be accommodated within a three-storey building that will be set fronting Rockhill Road, and will turn the corner with Fountain Road. The proposed mix is as follows:
  - 30 x 1 bedroom apartments; and
  - 14 x 2 bedroom apartments.



Figure 4 – 3D Visual of Proposal Fronting Rockhill Road



Figure 5 – 3D Visual of Building Fronting Rockhill Road



4.2 As illustrated in figures above the building has been designed to provide a more active and vibrant frontage along this part of Rockhill Road and Fountain Road.

The building will essentially have two wings extending along the northern and



southern boundary of the site that will face a central area of open space. The building has been designed with the corners of the building having gables that will be connected with a central roof span running parallel with the highway.

- 4.3 The palette of external materials selected includes:
  - Blue/grey brick;
  - White render;
  - Timber cladding;
  - Trespa cladding; and
  - Natural slate.
- 4.4 All first floor and second floor flats will have a balcony area. A communal bin/recycling storage area is proposed.
- 4.5 Vehicular access is proposed off Fountain Road and a total of 52 parking spaces that includes visitor spaces are proposed. The plans also make provision for the safe and secure storage of bikes.
- 4.6 The proposal has been informed from pre-application advice provided by the Council, which is attached at **Appendix A**.

## **5.0** Planning Policy Context

5.1 The planning policy framework for the determination of this application is provided by the content and scope of National Planning Policy, which is contained within the Wales Spatial Plan, Planning Policy Wales (PPW) and its associated Technical Advice Notes (TANs), together with the Development Plan for the local area.

## Planning Policy Wales (9<sup>th</sup> Edition)

5.2 Paragraph 9.1.2 of Planning Policy Wales (9<sup>th</sup> Edition) is particularly relevant to this application and should be given appropriate weight as it states that:



"Local planning authorities should promote sustainable residential environments, avoid large housing areas of monotonous character and make appropriate provision for affordable housing.

Local planning authorities should promote:

- mixed tenure communities;
- development that is easily accessible by walking, cycling and public transport, although in rural areas required development might not be able to achieve all accessibility criteria in all circumstances;
- mixed use development so communities have good access to employment, retail and other services:
- attractive landscapes around dwellings, with usable open space and regard for biodiversity, nature conservation and flood risk;
- greater emphasis on quality, good design and the creation of places to live that are safe and attractive;
- the most efficient use of land;
- well designed living environments, where appropriate at increased densities;
- construction of housing with low environmental impact (see 4.12); reducing the carbon emissions generated by maximising energy efficiency and minimising the use of energy from fossil fuel sources, using local renewable and low carbon energy sources where appropriate; and
- 'barrier free' housing developments, for example built to Lifetime Homes standards.
- 5.2 In addition, paragraph 9.2.3 identifies that Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general



objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live.

#### **Technical Advice Notes**

5.3 Planning Policy Wales is supplemented by a series of topic-based Technical Advice Notes (TAN's) which provide practical guidance relating to various forms of development and the role of the planning system in dealing with the determination of planning applications.

## TAN 12: Design

- 5.4 TAN 12 provides advice on design considerations and, in relation to the design of new development, it states that local planning policies and guidance should aim to ensure that:
  - "create places with the needs of people in mind, which are distinctive and respect local character;
  - promote layouts and design features which encourage community safety and accessibility;
  - focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
  - avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
  - promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;



- secures the most efficient use of land including appropriate densities; and
- consider and balance potential conflicts between these criteria."
- 5.5 Furthermore, The TAN advises that opportunities for innovative design will depend on the existing context of development and the degree to which the historic, architectural, social or environmental characteristics of an area may demand or inhibit a particular design solution. A contextual approach should not necessarily prohibit contemporary design.

## TAN 15: Development and Flood Risk

5.6 TAN 15 provides guidance on managing flood risk and sets out a precautionary framework to guide planning decisions. The overarching aim of the precautionary framework is, in order of preference; to direct new development away from those areas which are at high risk of flooding, and where development has to be considered in high risk areas (zone C) only those developments which can be justified on the basis of the tests outlined in section 6 and section 7 are located within such areas.

#### TAN 18: Transport

- 5.7 TAN 18 was published in March 2007 and offers national guidance on transportation related planning policies. It advocates:
  - the integration of land use planning and transport in order to promote resource and travel efficient settlement patterns;
  - ensuring that development is located where there is good accessibility by public transport, cycling and walking. This minimises the need to travel and promotes social inclusion;



- Managing parking provision.
- 5.8 Paragraph 3.2 encourages local authorities to maximise relative accessibility. Accessibility is the relative ability to take up services, markets or facilities. Focusing on accessibility is important in addressing social exclusion and for maximising choice in services, employment and recreational opportunities.

#### **TAN 24: Historic Environment**

5.9 TAN 24 was adopted in May 2017 and provides guidance on how the planning system considers guidance on the historic environment when making decision on planning applications. Of particular relevance to the current planning application is paragraph 1.23 that refers to the setting of historic assets that identifies that local planning authorities must treat World Heritage Sites, scheduled monuments, unscheduled nationally important archaeological remains, listed buildings, conservation areas and registered historic parks and gardens in Wales in their consideration of planning applications and producing development plans. This includes the impact of proposed developments within the settings of these historic assets.

#### **Development Plan**

5.10 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

5.11 Part 2 (Sustainable Development) of the Planning (Wales) Act 2015 says the following:



- 1. This section applies to the exercise by the Welsh Ministers, a local planning authority in Wales or any other public body—
  - (a) of a function under Part 6 of PCPA 2004 in relation to the National Development Framework for Wales, a strategic development plan or a local development plan;
  - (b) of a function under Part 3 of TCPA 1990 in relation to an application for planning permission made (or proposed to be made) to the Welsh Ministers or to a local planning authority in Wales.
- 2. The function must be exercised, as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015 for the purpose of ensuring that the development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales.
- 5.12 The Torfaen Local Development Plan (LDP) to 2021 is the development plan for the purposes of the Planning and Compulsory Purchase Act 2004. The relevant polices are referred to below.
  - S1 Urban Boundaries;
  - S2 Sustainable Development;
  - S3 Climate Change;
  - S4 Place Making/ Good Design;
  - S5 Housing;
  - S6 Employment and Economy;
  - S7 Conservation of the Natural and historic environment;
  - S8 Planning obligations;



- BW1 General Policy Development Proposals;
- H4 Affordable Housing;
- H5 POS recreational space within housing developments;
- EET5 Protection of Employment land and Premises;
- BG1 Protection of locally designated sites for Biodiversity;
- HE1 Impact on Listed buildings.

## **Supplementary Planning Guidance (SPG)**

- 5.13 The following SPG is relevant to this policy:
  - Planning Obligations SPG
  - Wales Parking Standards 2014

#### 6.0 Planning Appraisal

- 6.1 This section seeks to highlight the main issues relevant to the determination of the application and assess the scheme against the local and national planning policies referenced in section 4.0 above.
- 6.2 The main issues that are considered to be relevant in this case include:
  - The principle of development in relation to land use planning policy and sustainable development;
  - The effect the redevelopment of this site will have on the character and appearance of the area;
  - The impact on the setting of designated heritage assets;
  - The impact on the amenity of neighbouring properties;
  - Access and parking arrangements;



- The impact on flood risk;
- The impact on protected trees;
- Ecological Impacts;
- Noise:
- Contaminated land; and
- Planning Obligations.

## i) Principle of Development

- 6.3 Both local and national planning policy supports the provision of sustainable development and promotes the provision of development within the defined urban boundary. Policies S1 and S2 of the LDP seeks the efficient use of land within the urban boundary and there is a presumption in favour of sustainable development subject to other material considerations. Further to this Policy S5 seeks the provision of 4,700 new dwellings over the plan period. Provision is made to secure this through the provision of 289 dwellings on windfall sites.
- 6.4 The site comprises previously developed land that is located within the defined urban boundary. Policy EET5 of the LDP is pertinent as it relates to the protection of employment land and premises and states that:

"Development proposals for the conversion or redevelopment of employment sites for uses other than B1, B2 or B8 will only be permitted where they satisfy the following criteria where applicable:

a) It can be demonstrated that the land or premises are not well located for business, industrial or warehousing use; or the existing use is incompatible with adjoining uses;



- b) The premises and / or site have been assessed and is genuinely redundant based on the current and future needs of the employment market and has been realistically marketed at market value for current permitted use(s);
- c) The proposed uses are complimentary to the primary employment use of the surrounding area and will not cause an unacceptable impact on the operating conditions and requirements of existing businesses; and
- d) In the case of factory shops, it can be demonstrated that the operation is strictly ancillary to the main use of the site and that the goods sold have been manufactured on the premises."
- The applicant has sought to sell the business as a going concern since 2012. The business was marketed with Knightsbridge and the marketing campaign was not successful and Knightsbridge terminated their instructions as a sale could not be achieved. The supporting documentation detailing the marketing that has been undertaken will be provided under separate cover. Due to the information containing sensitive business and confidential information it is requested that this information is held confidentially by the Council.
- 6.6 The fact that the business could not be sold as a going concern over a period of 54 months demonstrates that there is no demand for the premises. The reasoning for this is the high running costs, which not exhaustive include high business rates, high utility bills and the ongoing maintenance of the building that was designed and erected in the 1970's for a more intensive commercial and heavy commercial use.
- 6.7 Given the above circumstances the business cannot continue to operate within such a framework, and is currently investigating opportunities to relocate the business to more suitable premises, which do exist within the Borough. The applicant currently employs 12 full-time workers, of which 6 are currently at retirement age and want to retire. As a result the redevelopment of this site



would enable the relocation of the business to a more suitable site, thus satisfying Policy EET5, which has the overarching aim of maintaining and supporting existing business to ensure employment opportunities remain locally accessible.

- 6.8 Finally, PPW advocates that Local Planning Authorities should ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing. It is currently the case that the Council has a 3.6 year land supply. Consequently this windfall site of 44 residential units would help increase the supply of housing.
- 6.9 Overall, the principle of the provision of the residential development at this site is one that is acceptable and accords with Planning Policy Wales and Policies S1, S2, S5 and EET5 of the LDP.

## ii) Character and Appearance

- 6.10 Policy S4 of the LDP seeks to promote good design and that new development must have full regard to the context of the local natural and built environment, and promotes the use of local distinctiveness through sympathetic design and material selection. Policy BW1 echoes this in respect of design and visual appearance. It also sets out a raft of criteria relating to ensuring good design and securing development that is of the appropriate scale, density and massing, and one that is inclusive.
- 6.11 As described earlier in this statement the existing site is run down. The poor architectural quality of the existing building fails to make a positive contribution to the overall character and appearance of the area. Due to the application site having a frontage on to Rockhill Road and Fountain Road an opportunity exists to provide a high quality and legible development that has an active and vibrant frontage.



- 6.12 The Design and Access Statement prepared by Richard Andrews Architects describes the design approach adopted and how the scheme has evolved from its inception. This has been based on assessing the constraints and opportunities of the site itself, as well as those outside the site, which include the Grade II Listed Buildings to the south west and Pontypool Historic Park and Garden to the north.
- 6.13 The building has been designed so that it is broken up with a gable feature at either end. The use of a mix of contemporary external materials, as well as the use of glazed balconies breaks the overall massing of the building and adds a degree of visual interest. The creation of the parking area at the rear of the site also ensures a sense of openness at the rear.
- 6.14 The proposal represents betterment to the existing built form on the site. The proposal is of a high quality design that will enhance the overall character of the street scene and surrounding area.
- 6.15 The proposed scale, form and design of the building would enhance the character of the surrounding street scene. The proposal is therefore compliant with Planning Policy Wales, Policy S4 of the LDP and TAN 12: Design.

#### iii) Heritage Assets

- 6.16 As touched upon in this report, a group of terraced properties fall to the west of the site. In relation to Listed Buildings, Policies S7 and HE1 seeks to conserve the character of designated heritage assets.
- 6.17 It is noteworthy that the existing use of the site and the utilitarian style of the building on site makes a poor contribution to the setting of these historic assets.



The Design and Access Statement describes the impact on this historic asset and finds that the provision of a scheme would result in significant improvements to the setting of the adjacent Grade II Listed Building. The proposal therefore complies with TAN 24: Historic Environment and Policies S7 and HE1 of the LDP.

## iv) Neighbour Amenity

- 6.18 Policy BW1 of the LDP seeks to ensure that proposals would not have a detrimental impact on the amenity of neighbouring properties.
- 6.19 The existing use of the site is unrestricted, so could operate 24 hours a day, 7 days a week. The proposed residential use would introduce a use that is more compatible with the residential area to the south and south west.
- 6.20 The existing building on the site covers a substantial area and the proposal would have a smaller footprint. The proposed building would be three-storey and the nearest neighbouring property would be No.72 Rockhill Road, to the west. The side elevation of this property would be sited a minimum of 15.0m off the proposed building. Given this separation distance, the presence of the existing highway, the south easterly aspect of No.72 the property the proposal would not have any material impact in respects of any overbearing impact of loss of daylight or outlook. Further to this, due to the orientation of the proposed building in respect of neighbouring properties it would not give rise to any loss of privacy as adequate separation distances would be maintained.
- 6.21 Overall, given the nature of the existing use and built form, along with the sensitive siting of the building, and the separation distances achieved, the proposal would not result in any significant adverse effect on the amenity of



neighbouring properties. The proposal therefore accords with Policy BW1 of the LDP.

## v) Access and Parking

- 6.22 The existing use is operated off both Rockhill Road and Fountain Road. As part of the proposal the access on to Rockhill Road will be stopped up, and one point of access into the site off Fountain Road will be created. Consideration was given to the creation of an access off Fountain Road, but for the reasons described in the Design and Access Statement this was not feasible. A total of 52 parking spaces are proposed including 8 visitor spaces. As part of the proposal it is intended to provide a footway along the northern side of Fountain Road that would tie in with the footway along Rockhill Road, which would encourage the use of more sustainable modes of transport.
- 6.23 The Council's SPG in relation to Parking Standards identifies that the site falls within parking zone 3: urban. In accordance with these standards, 1 space per bedroom (up to 3 spaces per dwelling maximum) and 1 space per 5 units for visitors parking are required. As a result 66 parking spaces are required. However, the site is considered to occupy a highly sustainable location, and the SPG allows for a reduction in these standards when a sustainability appraisal is carried out. The appraisal is produced below.

## Sustainability Appraisal

## a) Cycle Route

A cycle route (Route 492) is within 200m scoring 1 point.

## b) Surgery

Trosnant surgery is within 650 m scoring 1 point.



## c) School

West Mon school is within 700m scoring 1 point.

#### d) Bus Service

A bus stop (12 services) falls within 150m scoring 3 points.

## e) Frequency of Public Transport

Bus service every 10 minutes scoring 3 points

- 6.24 A total of 9 sustainability points will result in a reduction of 1 parking space per dwelling. As a result the proposal requires the provision of 52 spaces, which satisfies the SPG Parking Standards.
- 6.25 Overall, given the nature of the existing use, the proposed redevelopment of the site for flats would not give rise to a significant increase in the level of traffic generated to and from the site. Additionally, a sufficient level of parking is proposed. Accordingly the proposal is compliant with Parking Standards SPG.

#### vi) Flood Risk

6.26 TAN 15 sets out a precautionary framework and identifies that new development should be directed away from areas which are at high risk of flooding (defined as Zone C), and where development has to be considered in such areas, only those developments which can be justified on the basis of the tests outlined in the TAN are to be located in such areas. It maintains that there should be minimal risk to life, disruption and damage to property. Development should only be permitted in Zone C if it can be demonstrated that:



- i) Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or
- ii) It location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners to sustain an existing settlement or region; and,
- iii) It concurs with the aims of PPW and meets the definition of previously developed land.

(PPW fig 2.1); and

- iv) The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 6 and appendix 1 found to be acceptable.
- 6.27 With regards to criterion (i) to (iii) the site is within the Newport urban settlement boundary. The proposal would provide a beneficial use that is more compatible with the surrounding land use. The development is therefore necessary as part of a local authority strategy to sustain an existing settlement.
- 6.28 PPW defines previously developed land as:

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage...of the development is included, as are defence buildings, and land used for mineral extraction and waste disposal...where provision for restoration has not been made through development management procedures.

6.29 The application site clearly complies with the above definition, and comprises previously developed land, thus satisfying criterion (iii).



- 6.30 Notwithstanding the above, a Flood Consequences Assessment (FCA) has been prepared by Hydrock. Critically, paragraph 4.1 of the FCA identifies that while the site is currently shown as being located within Zone C2, NRW have confirmed that the model used to create these outlines is no longer fit for purpose. The FCA confirms that detailed hydraulic modelling has been undertaken based on survey information provided by NRW and concludes that the site is at decreased risk of flooding from the neighbouring watercourses and is located within Zone B.
- 6.31 Given the above modelling that has been undertaken, the application site falls within Zone B, the flood risk is deemed as being acceptable, thus in accordance with TAN 15.

#### vii) Protected Trees

6.32 A band of trees covered by a Tree Preservation Order form the boundary with the river corridor. An Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan has been submitted in support of the application, which demonstrates that the development can be accommodated on site without causing any detrimental impact on the root systems of trees.

## viii) Ecology

- 6.33 A Phase 1 Habitat Survey/Preliminary Ecological Assessment was undertaken in December 2016 by TerraAqua Ecological Services. The Phase 1 Habitat Survey identified the requirements for a bat and otter survey.
- 6.34 The Bat Survey found no evidence of current or recent bat activity within the building on site or from the culvert. One tree was identified as having some potential for bat activity, but no bats were recorded from the two emergence surveys. The Survey finds that with the retention of the tree lined corridor there would be no impact on protected species. Bat boxes have been incorporated into the design of the building.



6.35 In respect of otters, the Survey found that records show the presence of otters within 300m of the site. With the retention of the tree lined river corridor that is located at a lower level the survey concluded that the development will not have any significant impact on otters.

#### ix) Noise

6.36 A Noise Assessment prepared by Acoustics & Noise Limited (June 2017) has been undertaken for the proposed residential development. A baseline noise survey has been carried out, which involved a survey of road traffic noise. The survey concludes that in accordance with TAN 11: Noise that the noise levels result in the site falling into NEC B. With appropriate mitigation the noise from the road should result in a negligible effect on receptors. The development is therefore in accordance with the requirements of TAN 11:Noise.

#### x) Contaminated Land

- 6.37 A Preliminary Investigation Report prepared by Ian Farmer Associated (June 2017) has been undertaken. The preliminary assessment identifies that further work is required which includes site investigation works. Specifically this includes:
  - The sinking of boreholes and trial pits for the recovery of samples for geotechnical and chemical contamination analysis. Investigation of the tanks in the northern corner of the site may have to be carried out as a phase 2 once the site has been cleared.
  - The installation and monitoring of gas and groundwater monitoring standpipes.
  - Sampling of water upstream and downstream in the Nant Dar and the Afon Lwyd.



6.38 Based on the above, and following intrusive investigations if remedial works are required this would mitigate any risk to the development and surrounding environment.

## xi) Planning Obligations

6.39 The proposed development will trigger the requirement for affordable housing and financial contributions. As it stands the proposal would be unviable with the level of contributions detailed within the pre-application advice. No figure was provided in respect of the financial contribution sought for affordable housing. The applicant will provide a Viability Assessment in support of the application, which will contain confidential information.

#### 7.0 Conclusion

- 7.1 As demonstrated within this Planning Statement and the Design and Access Statement which is also submitted in support of the application, the development will provide a sustainable development comprising a mix of one and two bed dwellings, which sensitively responds to the surrounding context of the site.
- 7.2 The Council is currently unable to demonstrate a five year supply of deliverable housing sites, and this site. The range of studies that have been undertaken to support this planning application have been summarised in the above statement. These demonstrate that a high quality development will be achieved at the site, and that there are no environmental, technical or other reasons why planning permission should not be granted in this case.
- 7.3 This statement has identified that the proposed development complies with national and local planning policy. The Council's decision on the planning application must be taken in accordance with the development plan unless



material considerations indicate otherwise. In light of the schemes accordance with the development plan, and the significant benefit that it will deliver by transforming this to provide much needed housing, it is respectfully requested that planning permission is granted.