

Application no:	2023/0962
Ward:	Claygate Ward
Case officer:	Jack Trendall
Location:	Land North of Raleigh Drive Claygate Esher Surrey
Proposal:	Outline application for up to 60 dwellings, associated landscaping and open space with access from Raleigh Drive (For access).
Applicant:	Claygate House Investment Ltd & MJS Investments Ltd
Agent:	Mr Steven Brown Woolf Bond LLP The Mitfords Basingstoke Road Three Mile Cross Reading RG7 1AT

Report

Representations: 185 letters of objection have been received from 165 addresses, the concerns raised can be summarised as:

- Impact on the Green Belt.
- Impact on local infrastructure, amenities and services such as GP, dentist, schools as well as water, drainage and sewage infrastructure.
- Impact on flooding and flood risk.
- Impact on ecology and biodiversity.
- Draft Local Plan does not include any Green Belt release.
- Area suffers from frequent flooding which results in effluent spilling from the combined foul and surface water drains.
- There is a weight limited culvert at the end of Raleigh Drive which cannot support construction traffic and if damaged then all traffic would have to use Loseberry Road which cannot support such volumes of traffic.
- Master plan does not appear to include sufficient parking, leading to on-street parking in the surrounding roads.
- Layout and the size of the gardens are not in keeping with the surrounding area.
- Too high a density of development.
- Impact on highway safety and capacity.
- The Green Belt Boundary Review recommendations were not carried forward as part of the Draft Local Plan.
- The site access should be from Littleworth Road.
- There are not Very Special Circumstances that justify the proposal.
- If granted there will be subsequent applications to increase the density.
- Sandown Park Racecourse appeal decision reinforces the status of Green Belt and its level of protection.
- Green Belt should not be scored or subject to judgements on its performance. Terms such as 'tidying up' Green Belt boundaries are simply used to release land for development.
- Impact on air pollution.
- Noise and disturbance.
- Loss of privacy.
- Impact on the character of the area.
- Loss of trees and some trees already been removed.

- Access to the site is not appropriate.
- Affordable housing should be provided on the site.
- Proposed development undermines the Draft Local Plan prior to it being examined.
- The application should be determined by the Planning Committee and not be a delegated decision.
- Would set a precedent for other Green Belt sites to be developed.
- Vegetation removal from Hare Lane will not resolve the limited visibility at this junction and unclear how will this be maintained.
- This is the first of multiple applications designed to wear down local opposition.
- Houses on the perimeter should be limited to two-storeys to prevent loss of privacy.
- There is a right of access to the site through the Claygate House site.
- The same people are behind the proposed development and development of Claygate House.

1 letter of support has been received, the points raised can be summarised as:

- There is a need for more housing in Claygate and Elmbridge as a whole.
- This is a good site for housing.

2 letters of observation have been submitted from 2 addresses, the comments can be summarised as:

- Impact on services and amenities.
- Impact on traffic.
- Impact on the Green Belt.
- Impact on sewage system.
- Flooding.

Description

1. The application site contains a parcel of land formerly used for leisure purposes ancillary use to the former offices at Claygate House which have been converted into residential flats. The land formerly contained a bowls green, a pitch and putt golf course and a tennis court, all of which are no longer in use and have fallen into disrepair. The land is located to the north of Raleigh Drive and to the east of Claygate House in Claygate.

Constraints

2. The relevant planning constraints are:
 - Flood Zone 2
 - Flood Zone 3
 - Surface Water Flooding Medium and High
 - 8m Watercourse Buffer
 - Green Belt
 - TPO trees around the edge of the site

Policy

3. In addition to the National Planning Policy Framework and the National Planning Practice Guidance, the following local policies and guidance are relevant to the determination of this application:
 - **Core Strategy 2011**
 - CS1 – Spatial Strategy
 - CS11 – Claygate
 - CS14 – Green Infrastructure
 - CS15 – Biodiversity
 - CS17 – Local Character, Density and Design
 - CS19 – Housing type and size
 - CS21 – Affordable housing
 - CS25 – Travel and Accessibility
 - CS26 – Flooding
 - CS27 – Sustainable Buildings
 - **Development Management Plan 2015**
 - DM1 – Presumption in favour of sustainable development
 - DM2 – Design and amenity
 - DM4 – Comprehensive development
 - DM5 - Pollution
 - DM6 – Landscape and trees
 - DM7 – Access and parking
 - DM8 – Refuse, recycling and external plant
 - DM10 – Housing
 - DM17 – Green Belt (development of new buildings)
 - DM20 – Open Space and views
 - DM21 – Nature conservation and biodiversity
 - **Design and Character SPD 2012**
 - Companion Guide: The character of Elmbridge (an overview)
 - Companion Guide: Claygate
 - **Development Contributions SPD 2021**
 - **Flood Risk SPD 2016**
 - **Parking SPD 2020**

Relevant planning history

4. No history pertinent to this application but the site is adjacent to the former Claygate House site which has been converted to residential use, extended and additional blocks of flats are currently under construction. The site contains an old footpath from Claygate House to Raleigh Drive as well as a tennis court, bowling green and golf course, all of which have not been used for a number of years and have fallen into disrepair.

Proposal

5. Outline planning permission is being sought for up to 60 dwellings, associated landscaping and open space with access from Raleigh Drive (For access only). Consequently the Appearance, Landscaping, Layout and Scale of the

development are Reserved Matters that would be considered at a later date under a Reserved Matters application.

6. The proposed access is shown as from Raleigh Drive and alterations to the junction of Raleigh Drive, Rythe Road and Loseberry Road are part of the application.
7. An indicative layout and parameters plan has been provided to demonstrate how the proposed dwellings might be laid out within the site, however this is indicative.

Consultations

8. Claygate Parish Council – Object to the proposed development on the basis of its impact on the Green Belt, it would set a precedent for other Green Belt applications and is not supported by the Draft Local Plan.
9. Environment Agency – No objection to the grant of outline planning permission subject to conditions.
10. Environmental Health Contaminated Land – No objection subject to a condition regarding potential land contamination.
11. Environmental Health Noise and Pollution – No objection subject to conditions.
12. Greenspaces – Consider that the proposal would have an overall negative effect on biodiversity within the site. The loss of over 60% of the field cannot be easily mitigated in habitat terms by the proposal, no matter how comprehensive.
13. Housing Services – No comments received.
14. Joint Waste Solutions – Have commented on the requirements for the access road as well as the storage spaces for bins and the collection points.
15. Natural England – No objection as do not consider that the proposal would have a significant adverse impact on designated sites.
16. Surrey Bat Group – No objection to the proposed development as no buildings would be demolished or trees felled and the submitted surveys do not appear to show any significant activity and provided that the sensitive areas identified are left unlit there should be no serious negative impacts on the local bat population.
17. Surrey County Council Highways – Initially requested that additional information be provided with regards to the access arrangements and other off-site improvements. Following the receipt of additional information the Highways Authority requested that conditions and a legal agreement secure a 4-arm junction at Raleigh Drive/Loseberry Road/Rythe Road, a 'raised table' traffic calming facility at the junction of Hare Lane/Littleworth Road/Arbrook Lane, carriageway narrowing on Hare Lane and associated non-signalised pedestrian crossing facilities on Hare Lane, a non-vehicular access point to the adjacent development to the west of the site, 20mph Zone signage on Raleigh Drive, Rythe

Road and Loseberry Road, a 'Car Club', Travel Plan, electric vehicle charging points, vehicle and cycle parking and a construction transport management plan.

18. Surrey County Council Historic Environment Planning – No objection subject to a condition.
19. Surrey County Council Lead Local Flood Authority – No objection subject to conditions.
20. Surrey Wildlife Trust – Initially raised several concerns regarding the submitted ecological information and requested additional information be provided. Following the receipt of additional information advised that they had no objection subject to the inclusion of a number of conditions.
21. Thames Water – No objection but requested informatives be added in the event that planning permission be granted.
22. Tree Officer – Has raised no objection subject to the inclusion of a number of arboricultural conditions.

Positive and proactive engagement

23. The revised National Planning Policy Framework requires local planning authorities to work with the applicant in a positive and proactive manner to resolve problems before the application is submitted and to foster the delivery of sustainable development. This requirement is met within Elmbridge through the availability of pre-application advice.
24. Pre-application advice was sought prior to the submission of this application under reference 2022/2168 for a broadly similar scheme to the indicative proposal. Officers recommended that the applicant not submit an application as the proposed development would be inappropriate development within the Green Belt and unacceptable in principle. Officers also noted that the proposal would also result in a net loss of biodiversity. In considering the design of the proposal officers found it to be largely acceptable but there could be improvements. The impact on the neighbouring properties was considered by officers and was found to be likely acceptable subject to potential mitigation for the properties adjoining the proposed access.

Planning considerations

25. The main planning considerations in the determination of this application are:
 - Principle of the Development and its impact on the Green Belt
 - Housing
 - Design considerations
 - Impact on amenities of neighbouring properties
 - Highways and parking issues
 - Refuse and Recycling
 - Trees
 - Ecology
 - Flooding

- Financial considerations

Principle of the Development and its impact on the Green Belt

Principle of Residential Development

26. The Core Strategy indicates that there is scope for residential development through the redevelopment of existing sites with well-designed schemes that integrate with and enhance the local character. New development is required to deliver high quality design, which maximises the efficient use of land and which responds to the positive features of individual locations; integrating sensitively with locally distinct townscape while protecting the amenities of those living in the area. Innovative contemporary design that embraces sustainability and improves local character will be supported.
27. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. [...]
For decision-taking this means:
- c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
28. The Council does not benefit from a 5-year housing land supply required by Section 5 of the Framework and as a result paragraph 11 sub-paragraph d) of the NPPF is engaged as per footnote 8¹. It is therefore then necessary to turn to sub-paragraphs d)i. and d)ii. The application site is within the Green Belt which is set out in footnote 7² as being one of the areas or assets of particular importance that

¹ This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

² The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

should be protected in sub-paragraph d)i. It shall be considered below whether the application of the policies in the Framework relating to Green Belt provide a clear reason for refusing the development proposed. Likewise it shall be explored below whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, as per sub-paragraph d)ii.

Green Belt Considerations

29. Paragraph 137 of the NPPF sets out that:

'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

30. Paragraph 138 sets out that 'Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

31. Paragraph 147 of the NPPF sets out that:

"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

32. Paragraph 148 of the NPPF goes on to state that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations."

33. The NPPF sets out a list of exceptions that are considered not inappropriate development in paragraphs 149 and 150, however it is considered by officers that the proposed development would not meet any of these exceptions. Consequently, the proposed development would be inappropriate development by definition. The proposal would therefore result in definitional harm by reason of the inappropriateness and the proposal could only be permitted if 'very special circumstances' exist. The identified definitional harm must, as per paragraph 148 of the NPPF, be given substantial weight.

34. The submitted considerations weighing towards 'very special circumstances' are considered below, however it is necessary first to assess if there is any actual harm to the Green Belt resulting from the proposal. Firstly, it is necessary to assess the proposal against the five Green Belt purposes, then it needs to be

considered whether there is spatial and/or visual harm arising from the proposal and then finally if there is any other harm resulting from the proposal.

35. In considering the proposal against the five purposes as set out above it is not necessary to consider the fourth purpose as there are no instances in the Borough where historic towns directly abut the Green Belt and where Green Belt plays a function in the setting of such historic settlements. It is noted that the Applicant relies upon the Green Belt Boundary Review 2016 and the follow up Reviews produced by Arup on behalf of the Council. It should be noted that these reports were produced to inform the drafting of the new Local Plan and as highlighted, and still valid, by the Inspector for the Sandown Park appeal (local reference 2019/0551 and appeal reference APP/K3605/W/20/3249790) at paragraph 136 “The Arup reports have yet to be tested in the Local Plan process. They are subject to objections and have no status or weight for development control purposes or in policy terms.” In addition, the Reviews were commissioned to inform the Draft Local Plan and it was for the Council to determine if the recommendations in the Reviews are to be followed as part of the preparation of the Draft Local Plan. The Draft Local Plan, submitted to the Planning Inspectorate for examination in August 2023, does not propose any amendments to the Green Belt boundary. Additionally, as the reviews were carried out by an external company for the purposes of reviewing the Green Belt boundaries their conclusions, whilst useful and relevant to any application for development in the Green Belt, are not binding for the purposes of determining the applications and the Council as well as the Applicants are able to reach different conclusions. It is important to note that the overall soundness of the Reviews is a matter for the examination of the Draft Local Plan.
36. With regards to Purpose 1 which is “to check the unrestricted sprawl of large built-up areas’ it is noted that the NPPF does not define what constitutes a ‘large built-up area’. In the 2016 Green Belt Review by Arup it was considered by Arup that whilst this originally referred to London for the Metropolitan Green Belt, the scope has shifted over time to include other large settlements within the wider Green Belt Area. In the 2016 Green Belt Review by Arup it was noted that “The Dacorum, St Albans and Welwyn Hatfield review applied the term to London, Luton/Dunstable and Stevenage, though it is not immediately clear how this choice was reached. The Central Bedfordshire Green Belt Assessment applied the definition more broadly, considering any area deemed ‘urban’. When defining this term, the methodology for Elmbridge considered the settlement structure across the Borough, which consists of a series of small-medium sized towns as well as built-up areas immediately adjacent to London.” It was then considered in the Arup Report that the ‘large built-up areas’ would “correspond to the Tier 1 settlements (or equivalent) identified in the respective Local Plans for each local authority, both within and outside Elmbridge, to ensure a robust and evidence based approach to the assessment”. The term ‘Tier 1’ is not used in the Elmbridge Core Strategy 2011 or Development Management Plan 2015, however within Policy CS1 of the Core Strategy 2011 there is a hierarchy of settlements with Walton-On-Thames and Weybridge identified as the main settlement areas, with Esher, Hersham, East and West Molesey, Hinchley Wood and the Dittons identified as suburban settlement areas. In addition, in Policy CS1 Esher is identified as a District Centre, along with Weybridge, Cobham, East Molesey and Hersham. Esher is excluded from the list of ‘large built-up areas’ in Table 4.1 of the

2016 Green Belt Review by Arup, though there is an argument for its inclusion given how Esher is intermixed in Policy CS1 with the other settlements within Esher that are included. In addition, the 2016 Green Belt Review by Arup notes that within the neighbouring authorities Chertsey is a 'large built-up area', on the basis that Chertsey is identified as one of three town centres in the [Runnymede] Local Plan (2001) and identified as a 'large built-up area' in Runnymede Green Belt Review (December 2014). Spatially Chertsey is of a similar scale to Esher, as can be observed in Map 4.5 of the 2016 Green Belt Review by Arup. This consequently strengthens the argument that Esher could be considered to be a 'large built-up area'.

37. Likewise, the term 'sprawl' is not defined in the NPPF. As highlighted in the 2016 Green Belt Review by Arup there have been multiple attempts to define 'sprawl', noting that in the Guildford Green Belt and Countryside Study it was considered to be the 'creeping advancement of development beyond a clear physical boundary of a settlement'. The 2016 Green Belt Review by Arup adopted the definition of 'sprawl' as "the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way".
38. On the basis that Esher is considered to be a 'large built-up area', given that it is identified as a District Centre in the Core Strategy on the same level as other towns within the Borough and it is similar in size and function to other towns in neighbouring Boroughs that are identified as 'large built-up areas', it is considered that there is a conflict with Purpose 1. It is noted however that the site performs weakly with regards to Purpose 1 as the site has development adjoining on three out of its four boundaries.
39. With regards to Purpose 2 which is "to prevent neighbouring towns merging into one another" the applicant has significantly understated the performance of the site. At paragraph 5.21 of the Applicant's Green Belt Assessment it is concluded that the site makes no contribution to Purpose 2. In the 2016 Green Belt Review by Arup the site formed part of larger Local Area 45, which included the application site as well as the Green Belt area to the north of the site. Local Area 45 scored 5/5 as it forms an 'essential gap' between Esher and Claygate. The Local Areas were subdivided in the subsequent Green Belt Boundary Review 2018 and the application site was located within Sub-Area 59 and Arup gave the site a 1/5 score for Purpose 2. This assessment is based on the fact that the site is narrower than the Green Belt land to the north (Sub-Area 60), which scored 5/5 for Purpose 2. Sub-Area 60 has a width of approximately 300 metres immediately to the north of the application site, whilst Sub-Area 59 has a width of 170 metres as such whilst narrower it cannot be concluded that the site makes "no contribution" to Purpose 2. Arguably officers consider that Sub-Area 59 had been given too low of a score by Arup considering the 5/5 score given to the adjacent Sub-Area 60 and the wider Local Area 45. Esher and Claygate have not "coalesced" as stated by the Applicant at paragraph 5.21 of their Green Belt Assessment as they form distinct settlements. It is acknowledged that Esher and Claygate are linked by a small section of development around Hare Lane, Raleigh Drive and Rythe Road. What the proposed development would do is strengthen this link between the settlements by reducing the existing gap between them and increase the degree to which the settlements merge, both visually and spatially. As such there would be a conflict with Purpose 2.

40. Moving onto considerations associated with Purpose 3 (to assist in safeguarding the countryside from encroachment). The application site previously served as amenity space for Claygate House to its west and contained a pitch and putt golf course, a bowls green and a tennis court. The site has not been in active use for a significant period of time and has fallen into disrepair with the majority being rewilded as a result. Due to this natural appearance, the site is perceived as part of the countryside. Although there is a row of trees and vegetation along the northern boundary, such features are not uncommon within the countryside. Indeed, Sub-Area 60, located immediately to the north of the application site and which contains a number of rows of trees, received a score of 3/5 for Purpose 3 in the Arup Green Belt Boundary Review 2018. Consequently, it is not considered that soft boundary features such as rows of trees or hedges should be considered as dividing up or severing sections of the Green Belt. Given the above, the score given in the Applicant's Green Belt Assessment as weak to moderate is considered too low by officers as it is considered that the site makes a moderate contribution to Purpose 3 and consequently there would be a conflict with Purpose 3.
41. As mentioned above the fourth purpose is not considered relevant in this instance. The fifth purpose applies equally to all Green Belt sites and this is noted in the Applicant's Green Belt Assessment at paragraph 5.19 but it is then not considered further and is not included in the table on page 20 despite there being a clear conflict with Purpose 5. The proposed development would be entirely on Green Belt land and consequently would not encourage the recycling of derelict and other urban land. On this basis there is a significant conflict with Purpose 5.
42. Taking the above into account it is considered that the site contributes to the Green Belt purposes and consequently the proposed development would conflict with the purposes for which the land is designated as Green Belt as a whole.
43. Spatial and visual harm are distinct considerations and these are analysed below.
44. For there to be spatial harm to the openness of the Green Belt the proposal does not necessarily need to be publicly or even privately visible as Green Belt is not a landscape designation. This appears to have been somewhat glossed over in the submitted Landscape & Visual Impact Assessment and Green Belt Assessment (LVIA) prepared by CSA Environmental and in the Planning Statement (PS) prepared by Woolfe Bond Planning. The submitted LVIA and PS focus on the visual aspect of openness and do not consider the spatial impact. Indeed, the word 'spatial' is used only twice in the submitted Green Belt Assessment and only in reference to the Elmbridge Borough Landscape Sensitivity Study (2019) and the NPPG in Appendix E. The Planning Statement uses the word 'spatial' nine times, which are predominantly used with regards to the Council's spatial strategy and none of which are used in reference to Green Belt. Consequently, the PS considers at paragraph 6.67 that "the scale of built development proposed would incur minor harm to the openness of the Green Belt (primarily on the Site itself)". This assessment appears to ignore the spatial element of Green Belt assessment as 'openness' is generally accepted to mean the absence of built form, as such it is inconceivable to conclude that a development of 60 dwellings on open Green Belt land would only result in minor harm to openness.

45. The essential characteristics of Green Belts are their openness and their permanence. The site as it currently exists is characterised by open land with no structures on it other than the old tennis court and this is limited to the court, net and chain-link fencing enclosing the court. As such the spatial dimension of the Green Belt would be substantially impacted upon by the proposed development. It is noted that the application is in outline for up to 60 dwellings and consequently the details of the exact number and size of the dwellings is not known at this time. Should outline permission to be granted this would therefore mean that up to 60 dwellings is acceptable in principle and consequently it is appropriate to consider if the maximum number of dwellings proposed (60) could be accommodated in any format. As a minimum, 60 x 1 bed flats meeting the Nationally Described Space Standards would result in a GIA of 2,220sqm (excluding internal circulation space). This would represent a significant amount of floor area and volume of built form within the Green Belt, substantially greater than the existing limited built form on the site. It is noted that the application is for up to 60 dwellings and consequently a reserved matters application for fewer dwellings could come forward in the event outline permission is granted but the principle would still stand that up to 60 is acceptable, consequently the above assessment is appropriate. In all probability, a proposal not dissimilar to the indicative plans submitted would come forward if outline permission is granted due to other policy requirements regarding housing mix and tenure, leading to a far greater spatial impact than the existing site. However, any development on the site, up to 60 units, with the associated access roads and its urbanising effect would have a significant impact on the spatial aspect of the Green Belt.
46. On this basis it is considered that the proposed development would result in substantial spatial harm to the openness of the Green Belt. This harm to the Green Belt must, as per paragraph 148 of the NPPF, be given substantial weight.
47. The visual impact of the proposal on the Green Belt has been considered within the submitted LVIA which considers the visual effects in paragraphs 5.7 to 5.14. By taking into account views from surrounding roads and private properties it concludes that from the majority of these points there would be limited to no views of the proposed houses. This conclusion is not agreed as there would be views from the surrounding roads and properties, from both their windows and gardens, although it is noted that these will vary in the degree to which the proposal can be viewed.
48. The area of the application site is currently fenced off with a gate at the access point. The LVIA and the PS fail to consider the visual impact from within the site itself which would become publicly accessible and be subject to activities carried out by future residents. The proposed development would open up the site and make it a publicly accessible land for occupiers, visitors and other members of the public, such as nearby residents wishing to make use of the public open space or of the proposed playground. Anyone accessing the site would therefore have uninterrupted and up-close views of the newly introduced built form. Consequently, there would be a severe visual impact from within the site itself, as once one enters the site and is stood within the proposed development it would

not be possible to identify the site as land free of development, i.e. characterised by its openness.

49. On this basis it is considered that the proposed development would result in substantial visual harm to the openness of the Green Belt. This harm to the Green Belt must, as per paragraph 148 of the NPPF, be given substantial weight.

Any Other Harm

50. As part of the consideration of inappropriate development within the Green Belt and whether Very Special Circumstances exist, paragraph 148 of the NPPF requires the Council to also take into account whether there is any other harm resulting from the proposal.

51. As concluded above the proposed development would result in definitional harm to the Green Belt, spatial and visual harm to its openness and would conflict with the purposes for which Green Belts are designated. In addition, for the reasons set out in the paragraphs below, there would also be harm to on-site biodiversity, affordable housing in the borough due to the lack of a legal agreement and harm to highway safety and sustainable travel due to the lack of a legal agreement.

Benefits and 'Very Special Circumstances'

52. It has been established that there would be definitional harm to the Green Belt, the proposal would be contrary to the purposes of Green Belts taken as a whole, as well as substantial spatial and visual harm to the openness of the Green Belt. All of these, individually and cumulatively, attract substantial weight. As such, it is necessary to consider whether there are any other considerations that would amount to 'very special circumstances'. The benefits set out by the applicant, which are considered by the applicant to meet the test for 'very special circumstances' can be summarised as:

- Significant need for market and affordable housing in the Borough and the scheme would contribute towards meeting these needs.
- Proposal would provide 50% of the dwellings as affordable housing.
- There is a shortfall of deliverable land for development in the Borough.
- The evidence base for the Draft Local Plan suggested the site be removed from the Green Belt.
- Site is a sustainable location for development.
- The proposed scheme creates publicly accessible open space.
- A new pedestrian crossing on Hare Lane would be provided
- The proposed scheme would result in significant economic benefits.
- The proposed scheme would result in significant social benefits.
- The proposed scheme would result in significant environmental benefits, including a 10% biodiversity net gain.

53. The benefits set out by the applicant have been entered into the below table, along with the weight the applicant has attached to them.

Benefit	Weight attributed by Applicant
Provision of market housing	Very substantial weight
Provision of affordable housing (50%)	Very substantial weight
Economic benefits (construction and on-going expenditure from occupiers)	Substantial weight
Social benefits (sustainable location, a range of housing types and size, high quality residential environment, provision of up to 30 affordable dwellings)	Very substantial weight
Environmental benefits (biodiversity net gain through off-site enhancements, enhanced landscaping, provision of new habitats and additional planting)	Moderate positive weight

54. The Council has considered the benefits put forward by the applicant and has assessed them below. The Council considers that different weighting should be applied and notes that there is also a degree of double counting, for example affordable housing is given as its own benefit but also as part of the Social benefits put forward by the applicant.

55. The Council at 4.36 years cannot demonstrate a 5-year housing land supply and as such it is considered appropriate to give significant weight to the provision of market housing.

56. The Council gives substantial weight to the provision of 50% of the dwellings on-site being provided as affordable housing given the significant identified unmet need for affordable housing in the Borough.

57. The economic benefits can only be limited weight as construction jobs would be time limited and the contributions that future occupiers would make to the local economy is difficult to quantify, though it is noted that an attempt to do so has been done by the applicant by examining how much future occupiers might initially purchase locally upon moving into their new home and how much they might spend locally as a resident. However, it would not be possible to guarantee that future occupiers would buy initial items upon moving in locally or indeed shop locally. In addition, these benefits are generic to any development and whilst it is noted that factors taken into consideration do not have to be unique, though this may contribute to their 'very special' quality, this is certainly a commonplace benefit of limited weight.

58. The proposed social benefits set out by the applicant are: the sustainable location of the site, a range of housing types and size meeting the identified need which would be agreed at the reserved matters stage, a high quality residential environment and the provision of up to 30 affordable homes. The site is considered to be in a sustainable location given its proximity to Claygate centre which contains a variety of amenities and services including Claygate railway station and this is a point in its favour however it is also a policy requirement for development to be directed to sustainable locations. The range of housing types and size is not under consideration under this application for outline permission

with all matters reserved apart from access. As the Council cannot assess the range of housing types and sizes at this time it cannot be given any weight, either positive or negative. Likewise, as the details of layout, appearance, scale and landscaping it is not possible to assess if a high-quality residential environment would be provided so this matter cannot be given any weight, either positive or negative. The matter of affordable housing is its own benefit so should not be double counted here and as such it has not been given weight within the social benefits.

59. With regards to the environmental benefits set out by the applicant this is considered by the Council to be an additional harm as the proposal would result in a net loss of biodiversity on site. As set out in paragraph 6.145 of the Planning Statement the proposed development would result in an overall net loss of 24.56% of Area habitats. The applicant is claiming there would be a benefit through a biodiversity net gain achieved through offsetting the on-site loss by off-site compensation. The applicant has suggested a Grampian condition that would require the submission of details of an off-site biodiversity improvement scheme, along with a legal agreement and management programme. No details have been provided as to where the biodiversity improvements would be, nor what the improvements might consist of. The lack of details provided raises significant concerns that such a condition would meet the tests set out in paragraph 56 of the NPPF, in particular it is unclear how the condition would be precise when the location and nature of the improvements is unknown, the improvements would potentially be a significant distance from the application site and therefore not relevant to the development and if located a significant distance away and outside of the Borough then it is unclear how the condition could be enforceable as it may be extremely difficult to monitor and take enforcement action.

60. Another option for securing off-site biodiversity compensation would be through a planning obligation under Section 106 and as such it would need to meet the three tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and in Paragraph 57 of the NPPF. It is not considered that off-site compensation would meet the tests, in particular the test requiring the obligation be “directly related to the development”. Biodiversity compensation not in the vicinity of the site would not be directly related to the development and as such fail the tests. This would result in a conflict with Policy CS15 of the Core Strategy which shall be considered in detail below. As a result of an on-site loss of biodiversity which cannot be offset and despite the proposed enhanced landscaping (which as mentioned above is not under consideration as part of this application), provision of new habitats and additional planting it is considered that the environmental impact of the proposal must be given significant negative weight.

61. The Council’s consideration of the submitted benefits is summarised in the table below.

Benefit	Weight attributed by Council
Provision of market housing	Significant weight
Provision of affordable housing (50%)	Substantial weight
Economic benefits (construction and on-going	Limited weight

expenditure from occupiers)	
Social benefits (sustainable location, a range of housing types and size, high quality residential environment)	Limited weight
Environmental benefits (biodiversity net gain through off-site enhancements, enhanced landscaping, provision of new habitats and additional planting)	Significant negative weight

62. Having considered the submitted benefits of the proposal it is considered that these benefits do not clearly outweigh the identified harm to the Green Belt arising from the identified definitional, spatial and visual harm and conflict with the purposes of Green Belt, all of which must be given substantial weight. In addition it is considered that there is other harm resulting from the proposal, which would be the on-site loss of biodiversity, the lack of a legal agreement to secure affordable housing, a 'Car Club' vehicle and off-site highways improvements, which are considered below. Taken together the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is not clearly outweighed by other considerations. Consequently, under paragraph 11d) i. this provides a clear reason for refusing the development proposed.

Housing

Housing Mix and Need

63. Policy CS19 of the Core Strategy 2011, Policy DM10 of the Development Management Plan 2015 and para. 124a of the revised NPPF 2023 state that development should meet the identified need for housing. The latest measure of housing need for Elmbridge is set through the Government's Standard Methodology which, identifies the requirement to provide 647 dwellings per annum across the borough. Breaking down the annual requirement to identify the type, size and tenure of new homes that should be provided to meet local housing needs, is the Local Housing Needs Assessment (LHNA, 2020). The LHNA identifies the overall need within Elmbridge is for affordable, smaller units within one to three bedrooms.

64. With regards to breakdown para. 13 of the LHNA states that for Market Housing the need is:

- 1 bed (20%)
- 2 bed (50%)
- 3 bed (20%)
- 4 bed (10%)

65. For Affordable Housing, the LHNA (paras. 19 and 21) identifies the net annual need as 269 units broken down as:

- 1 bed (15%)
- 2 bed (34%)
- 3 bed (11%)
- 4 bed (40%)

66. The most recent Authority Monitoring Report (AMR) (2021/2022) was published Q4 2022. At the end of the 21/22 monitoring year, the Council recorded a total of 768 additional homes completed.
67. It can be seen clearly that the Council's identified need for housing shows that smaller 1, 2 and 3 bed units are required, but in the last year the provision of 4+ bedroom properties represented 19.29% of the boroughs housing delivery. The need for 4+ bed market homes forms just 10% of the requirement identified by the 2020 Assessment of Local Housing Need. The Council recently published two Development Management Notes, which explain how the Local Planning Authority is proposing to optimise development land in the Borough; and how to understand housing need. Both are available on the Council's website. These confirm that the number of new four bed (plus) homes in the Borough has already achieved over the 10% identified in the Assessment of Local Housing Need (2020). The continued oversupply of larger homes could further exacerbate affordability issues and going forward this size of home no longer positively contributes towards meeting local housing need.
68. The provision of smaller dwellings is considered vital for widening the choice of homes within the Borough and there is an identified overwhelming need for smaller dwellings. It has also been identified that there has been an oversupply of large, four or more bedroom properties and that going forward this size of home does not make a positive contribution towards meeting local housing need.
69. The proposed development is outline with all matters reserved except for access as such the housing mix would be set out at the reserved matters stage and is not under consideration as part of this application.

Affordable Housing

70. Policy CS21: Affordable Housing of the Council's Core Strategy (2011) requires that development resulting in the net gain of 15 dwellings or more on a greenfield site to provide 50% of the gross number of dwellings on site as affordable dwellings. This equates to a requirement for up to 30 affordable units on-site. The applicant has indicated their willingness to provide a legal agreement to secure the 50% affordable housing contribution in their application documents. To date a satisfactory signed legal agreement has not been provided and consequently the proposal is in conflict with Policy CS21 of the Core Strategy 2011 and the NPPF 2023.

Quality of accommodation for future occupiers

71. Proposed new residential development should provide an appropriate level of lighting, outlook and amenity to all habitable rooms and be of suitable space standards. Developments are also expected to enhance existing landscaping and allow visual interest and amenity that provides a setting for the proposed development. Policy DM10 of the Development Management Plan (2015) requires new residential accommodation to comply with the Technical housing standards – nationally described space standards (March 2015) and include gardens or outdoor space commensurate with the type and location of housing proposed.

72. Given the outline nature of the proposed development it is not possible to make an assessment of the quality of accommodation for future occupiers and this would be assessed at the reserved matters stage.

Design considerations

Density

73. Policy CS17 of the Core Strategy seeks to achieve an overall density of 40 dwellings per hectare across the Borough. The proposed development would provide up to 60 dwellings on a site with a total area of 2.2 hectares, this would result in a density of 27.27 dwellings per hectare. However, this does not take into account that a significant part of the site cannot be developed due to its location within Flood Zone 3. Taking this into account reduces the developable area to 1.4 hectares, a total of 60 dwellings would therefore result in a density of 42.85 dwellings per hectare which is in excess of the target density of 40dph. If 60 dwellings is proposed on the site, and it is noted that the proposal is for up to 60 and as such it may be less, then the proposal would be considered to be making the most efficient use of land in accordance with policies CS17 and the NPPF. The minimum number of units that could be provided and still meet the minimum density would be 42 dwellings, any fewer dwellings would result in a conflict with policy CS17. The exact number of units is not known at this point however and would have to be fully assessed at the reserved matters stage.

Layout

74. The layout of the proposed development is not under consideration as part of this application, though a proposed parameter plan and indicative master plan have been provided along with other indicative drawings. The parameter plan shows that the proposal would be concentrated along the western side of the site and centrally with an open space along the eastern side due to that part of the site being within Flood Zone 3. This general indicative arrangement is considered acceptable in principle but the detailed layout would have to be assessed and considered at the reserved matters stage.

Scale, Height and Massing

75. Policy DM2 states that all development proposals should preserve or enhance the character of the area, taking account of design guidance detailed in the Design and Character SPD, paying particular regard to the appearance, scale, mass, height and pattern of built development.

76. The scale, height and massing is not under consideration as part of this application, though indicative heights and elevations have been provided on the indicative drawings. The scale, height and massing would be considered at the reserved matters stage.

Appearance, architecture and materials

77. The National Design Guide advises that well designed places contribute to local distinctiveness. This may include:

- adopting typical building forms, features, materials and details of an area;
- drawing upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings;
- using local building, landscape or topographical features, materials or planting types;
- introducing built form and appearance that adds new character and difference to places;
- creating a positive and coherent identity that residents and local communities can identify with.

78. The National Design Guide also advises that “in well-designed buildings, the materials and details suit the design concept”. The design of the proposed is not under consideration as part of this application and would be considered at the reserved matters stage.

Landscape

79. An indicative landscaping plan has been provided, however the proposed landscaping is not under consideration as part of this application and would be considered at the reserved matters stage.

Impact on amenities of neighbouring properties

80. Policy DM2 states that to protect the amenity of adjoining and potential occupiers and users, development proposals should be designed to offer an appropriate level of outlook and provide adequate daylight, sunlight and privacy.

81. As the proposed layout, scale, height and massing along with the position of windows of the proposed development are not known at this stage and would be provided at the reserved matters stage it is not possible to make a full assessment of the impact on the amenities of neighbouring properties.

82. That being said it is possible to make an in principle assessment and it is considered that it is possible for up to 60 dwellings to be provided on the site without causing material harm to the amenity of the neighbouring properties by reason of loss of light, overbearing impact and loss of privacy, though this would need to be formally assessed at the reserved matters when finalised detailed plans would be provided.

83. There is a concern regarding the potential impact from the vehicular access causing noise and disturbance to the occupiers of Dunelm, Raleigh Drive and No. 36 Rythe Road from the vehicles that would be accessing the site. However, this is difficult to assess at this stage as the number of dwellings is unknown and could be mitigated against through measures such as acoustic fencing along the side boundaries of both properties. As such whilst this would need to be addressed at the reserved matters stage it is not considered to result in an in principle reason for refusal relating to the amenity of these properties.

Highways and parking issues

Highway Safety and Capacity

84. The proposed development and the submitted documents have been reviewed by Surrey County Council Highways in their capacity as the County Highway Authority. The County Highway Authority initially requested that additional information be provided with regards to the access arrangements and other off-site improvements. Following the receipt of additional information the Highways Authority requested that through a combination of conditions and a legal agreement the following be secured: a 4-arm junction at Raleigh Drive/Loseberry Road/Rythe Road, a 'raised table' traffic calming facility at the junction of Hare Lane/Littleworth Road/Arbrook Lane, carriageway narrowing on Hare Lane and associated non-signalised pedestrian crossing facilities on Hare Lane, a non-vehicular access point to the adjacent development to the west of the site, 20mph Zone signage on Raleigh Drive, Rythe Road and Loseberry Road, a 'Car Club', Travel Plan, electric vehicle charging points, vehicle and cycle parking and a construction transport management plan.
85. Subject to the imposition of the conditions and the receipt of a satisfactory legal agreement to secure the 'Car Club' and the off-site measures it is considered that the impact of the proposed development on the local highway network would be acceptable. To date no legal agreement has been provided.

Parking

86. As the layout, housing mix and number of dwellings is not under consideration it is not possible to assess the amount of parking to be provided, nor the layout of the parking. These matters would have to be considered at the reserved matters stage.

Refuse and Recycling

87. As the layout is not known at this stage it is not possible to make a full assessment. Joint Waste Solutions have been consulted and have provided the details of their requirements for the access to and within the site and this would need to be incorporated into the detailed design, which would be assessed at the reserved matters stage. The access from Raleigh Drive appears to meet the access requirements, however the remainder of the site would also need to and this cannot be assessed at this time.

Trees

88. Policy CS14 promotes safeguarding of important trees, woodlands and hedgerows and securing provision of soft landscaping measures in new development, focusing on the use of native species, particularly trees, which are an important feature of the Elmbridge landscape, and taking opportunities to create links with the wider green infrastructure network. It confirms that the Council aims to give a high level of protection to the Borough's green infrastructure network; and that urban trees have an important role in sustainable communities, providing numerous aesthetic, social and health benefits and are a

key feature in the Elmbridge landscape. Policy CS15 supports protection of woodland, including ancient woodland, from damaging development and land uses, given that trees make an important contribution to the character and appearance of the Borough.

89. Policy DM6 requires that the development proposals are designed to include an integral scheme of landscape, tree retention and protection. It confirms that the proposals should not result in loss or damage to trees that are, or are capable of, making a significant contribution to the character or amenity of the area, unless in exceptional circumstances the benefits would outweigh the loss. This policy seeks to adequately protect existing trees including their root systems prior to, during and after the construction process.
90. The Council's Tree Officer has been consulted on the application and the submitted documents. The Tree Officer raised no objection to the proposal provided that the works are carried out to the specifications detailed within the supplied arboricultural report and subject to the inclusion of a number of conditions. On this basis it is considered that the proposed development would be acceptable in arboricultural terms, however this would need to be reviewed at the Reserved Matters stage as the detailed design would be provided at that time and further conditions or information may be required depending on the detailed design.

Ecology

91. Policy CS15 of the Core Strategy 2011 sets out that "the Council will seek to avoid loss and contribute to a net gain in biodiversity across the region and the objectives of the Surrey Biodiversity Action Plan (BAP), by.... Ensuring new development does not result in a net loss of biodiversity and where feasible contributes to a net gain through the incorporation of biodiversity features."
92. The application has been supported by an Ecological Impact Assessment by CSA Environmental. The proposed development, based on the submitted indicative plans, would result in an on-site net loss of 3.51 habitat units (equating to a loss of 24.56%). Due to the net loss of biodiversity on-site the applicant and CSA Environmental have set out that off-site biodiversity credits will be obtained through a third-party provider in order to compensate for the on-site biodiversity loss and as a result of this a biodiversity net gain of 10% will be achieved.
93. The only mechanism to secure off-site improvements, other than through a Grampian condition which would not be appropriate in this instance, is through a planning obligation. For a planning obligation to be valid it must meet the tests set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and which are repeated in Paragraph 57 of the NPPF. Paragraph 57 sets out that "Planning obligations must only be sought where they meet all of the following tests:
- a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and

c) fairly and reasonably related in scale and kind to the development.”

94. It is considered that a planning obligation to secure off-site biodiversity credits would not meet these tests, in particular the credits would not be directly related to the development. The biodiversity credits would result in off-site improvements however, these improvements would not necessarily be in the vicinity of the site and most likely would be outside of the Borough, indeed the improvements could be located in a completely different part of the country and as such it is not possible to say that those improvements would be directly related to the development.
95. On this basis it is considered that the proposed development would result in a net loss of biodiversity contrary to Policy CS15 of the Core Strategy 2011 and the NPPF 2023.

Flooding

96. Core Policy CS26 seeks to reduce the overall and local risk of flooding in the Borough. The NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The site falls within flood zones 2 and 3. A Flood Risk Assessment has been submitted by the applicant in support of the application.
97. The Environment Agency and Surrey County Council Lead Local Flood Authority have been consulted on the application and neither has raised an objection subject to the imposition of conditions.
98. On this basis and taking into account that the application is an outline application with all matters reserved with the exception it is considered that the matter of flood risk is satisfactory at this stage.

Financial considerations

New Homes Bonus

99. Section 70 subsection 2 of the Town and Country Planning Act 1990 (as amended) states that any local financial considerations are a matter to which local planning authorities must have regard to in determining planning applications; as far as they are material for the application. The weight to be attached to these considerations is a matter for the Council.
100. The New Homes Bonus is a grant paid by central government to local councils for increasing the number of homes and their use. The New Homes Bonus is paid each year for 4 years. It is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. There is also an extra payment for providing affordable homes. The New Homes Bonus Scheme Grant Determination for 2023/24 is £114,885.
101. Local financial considerations are defined as grants from Government or sums payable to the authority under the Community Infrastructure Levy (CIL). This means that the New Homes Bonus is capable of being a material consideration

where relevant. In the current case, the approval of the application would mean that the New Homes Bonus would be payable for the net increase in dwellings from this development.

Community Infrastructure Levy (CIL)

102. The proposed development is liable for CIL. The chargeable amount will depend on the floor area of the proposed development which is not known at this time and will be subject to indexation.

Matters raised in representations

103. The majority of the matters raised have been addressed in the planning considerations, the remainder are addressed below.

104. The proposed development would be liable for CIL as detailed above, this financial contribution would go towards local infrastructure, services and amenities.

105. The proposed development must be determined in accordance with the Development Plan as per Section 38 (6) of the Planning and Compulsory Purchase Act 2004. The Elmbridge Draft Local Plan is at an advanced stage as it was submitted on 10th August 2023. However, whilst a material consideration the Draft Local Plan cannot be given weight at the time of the drafting of this report as it has yet to begin being examined. The weight that can be given to the Draft Local Plan will change as the plan moves through the examination process. Consideration was given to whether there were grounds for refusal on the basis of prematurity as per paragraphs 48 to 50 of the NPPF 2023, however at this point in time it was considered that the proposal did not meet the requirements, though future applications may.

106. The weight limited culvert would be taken into consideration as part of a construction transport management plan which would be secured via a suitably worded condition were permission to be granted.

107. The layout and size of the gardens indicated are indicative and would be assessed at the Reserved Matters stage if permission was granted.

108. The Local Planning Authority is required to assess the application that has been submitted and the access is shown as from Raleigh Drive and consequently that is what must be assessed.

109. The Local Planning Authority is required to assess the application that has been submitted and cannot presume if further applications to increase density would be submitted, any such applications would be determined on their own merits.

110. The site and the surrounding roads are not within an Air Quality Management Area (AQMA) and the Council's Environmental Health Noise and Pollution team have been consulted on the application and raised no objection subject to

conditions, consequently it is considered that the proposal would not materially impact upon air quality.

111. The application has been determined in accordance with the Council's Scheme of Delegation, which allows the application to be determined under delegated powers if the recommendation is to refuse.
112. Each application must be determined on its own merits in accordance with local and national planning policy.
113. The matter of highway safety has been considered by SCC Highways and they have raised no objection subject to conditions and a legal agreement to secure a 'Car Club' vehicle and off-site highway improvements.
114. There is a right of way through the Claygate House site to the west of the site to this site but the application proposes an access from Raleigh Drive and that is what must be assessed.
115. The Local Planning Authority is required to assess the application that has been submitted on its planning merits whether the applicant is also an owner or part-owner of neighbouring land or developments is not relevant to the determination of this application.

Conclusion

116. The Council, as identified above, does not benefit from a 5-year housing land supply required by Section 5 of the Framework and therefore the tilted balance under para. 11d) of the NPPF is engaged. It is therefore necessary to consider whether the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed and whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
117. It is considered that the identified definitional harm, conflict with the purposes of Green Belts, along with the identified spatial and visual harm to the Green Belt which is an asset of particular importance provides a clear reason for refusing the application. In addition, it is considered that the identified harm to the Green Belt and on-site biodiversity would significantly and demonstrably outweigh the benefits of up to 60 additional residential dwellings, of which 50% would be affordable and the associated economic and social benefits. It should be noted that in the absence of a legal agreement to secure the affordable housing that there is a conflict with Policy CS21 of the Core Strategy 2011. Consequently, it is recommended that planning permission be refused for the following reasons.
118. The proposed development would be inappropriate development within the Green Belt which would result in definitional harm as well as spatial and visual harm to the openness of the Green Belt and would conflict with the purposes of Green Belts. This harm would not be clearly outweighed by other considerations which would meet the bar for 'very special circumstances'. Consequently, the


proposed development would be contrary to Policy DM17 of the Development Management Plan 2015 and the NPPF 2023.

119. The proposed development, by reason of the on-site net loss of biodiversity which cannot be offset off-site, would result in harm to on-site ecology and biodiversity and would be contrary to Policy CS15 of the Core Strategy 2011 and the NPPF 2023.

120. The proposed development, by reason of the absence of a completed legal agreement to secure on-site affordable housing, would fail to make a contribution to the provision of affordable housing in the Borough contrary to Policy CS21 of the Core Strategy 2011 and the NPPF 2023.

121. The proposed development, by reason of the absence of a completed legal agreement to secure a 'Car Club' vehicle on-site and off-site highway improvements, would prejudice highway safety and cause inconvenience to other highway users and fail to promote sustainable transport. The proposed development would therefore be contrary to Policy CS25 of the Core Strategy 2011, Policy DM7 of the Development Management Plan 2015 and the NPPF 2023.

The proposed development does require a CIL payment

Elmbridge Borough Council
Issuing of planning decisions under Scheme of Delegation Adopted September 2019
Case officer: Jack Trendall
Recommendation agreed:

Natalie Lynch Team Leader
for Strategic Director
Date: 22 September 2023