

 <b>Reigate &amp; Banstead</b> BOROUGH COUNCIL Banstead   Horley   Redhill   Reigate	<b>TO:</b>	PLANNING COMMITTEE
	<b>DATE:</b>	9 <sup>th</sup> February 2022
	<b>REPORT OF:</b>	HEAD OF PLANNING
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<b>AGENDA ITEM:</b>	12	<b>WARD:</b> Banstead Village

<b>APPLICATION NUMBER:</b>	21/03016/F	<b>VALID:</b>	30/11/2021
<b>APPLICANT:</b>	Ministry of Justice	<b>AGENT:</b>	Edgeplan
<b>LOCATION:</b>	<b>HMP HIGH DOWN, HIGHDOWN LANE BANSTEAD SM2 5PJ</b>		
<b>DESCRIPTION:</b>	<p><b>Please Note: Access to the details of the scheme is restricted, and plans cannot be viewed without authorisation due to potential security threat of publication.</b></p> <p><b>New single storey workshop facility and relocation of existing dog kennels. As amended on 20/12/2021</b></p>		
<p><b>All plans in this report have been reproduced, are not to scale, and are for illustrative purposes only. The original plans should be viewed/referenced for detail.</b></p>			

**This application is referred to Committee in accordance with the Constitution as the application exceeds 250sqm of floorspace.**

## SUMMARY

This is a full application for the construction of a new workshop facility, the relocation of the existing dog kennels and associated works at HMP High Down. The site is located to the north of the borough in Banstead and is within the Metropolitan Green Belt.

The proposed workshop would be a large, roughly square, flat roofed building of utilitarian appearance, 7m in height. The proposed materials would reflect the utilitarian form, being comprised of light coloured facing brick and grey metal, ridged cladding. Whilst the building would be large it would be sited within the existing prison complex, which consists of similarly large buildings of not dissimilar appearance. Within this context the building would be acceptable. The existing dog kennels would be removed and re-sited to the north of the workshop building. Whilst the dog kennel compound would be on a larger footprint, this would be a modest increase and the appearance would be similar to the existing. The existing vehicular access would be modified to allow connectivity with the wider site.

The site of the prison is considered to constitute previously developed land (PDL) within the Green Belt as defined within the National Planning Policy Framework 2021 (NPPF). Paragraph 149 (g) of the NPPF allows for the partial infilling of PDL

subject to the development not giving rise to a greater level of harm to openness than the existing development. In this instance, whilst the proposed workshop would be of a substantial size (1253.6 sqm in footprint), it would be located within the existing prison compound, surrounded by other large buildings, and would be relatively low scale in comparison. The new dog kennel compound would be approx.. 25m greater in area than the existing kennels, however these are proposed to be removed, therefore the additional amount of built form would be quite minimal and would not be significantly harmful to openness.

The development would not result in any impact with regard to highway matters. Whilst no landscaping is proposed this is considered to be appropriate in this case, as the site is devoid of landscaping, which would be impractical for a prison site on the grounds of security. The submitted drainage scheme has been reviewed by the Lead Local Flood Authority (LLFA) who have raised no objections subject to conditions.

It is noted that the site was once occupied by the former asylum complex, and the proposed workshop would be in the approximate location of the former chapel building. The submitted archaeological Desk Based Assessment (DBA) has reviewed the scheme and concluded that the likelihood of encountering finds from this period is low.

The scheme is considered to be acceptable with regard to the above matters.

### **RECOMMENDATION(S)**

Planning permission is **GRANTED** subject to conditions.

## **Consultations:**

Surrey County Council Lead Local Flood Authority: The submitted drainage strategy has been reviewed by the LLFA who have raised no objections. Conditions requiring the submission of details of a surface water drainage scheme prior to the commencement of development, and the submission of verification report prior to occupation.

## **Representations:**

Letters were sent to neighbouring properties on the 1<sup>st</sup> December 2021. No responses have been received.

### **1.0 Site and Character Appraisal**

- 1.1 The site is occupied by HMP High Down, located to the very North of the Borough in Banstead. The site lies within the Metropolitan Green Belt, with Banstead Downs to the north, west and south. The site is large and sprawling in nature encompassing both High Down prison to the South and Down View to the North. The built form of the site consists of accommodation blocks and associated buildings such as storage and workshops etc, all of which are utilitarian and functional in appearance given the use of the site. There is both a staff and visitor carpark, located beyond the secure confines of the prison walls. The site remains flat throughout.
- 1.2 The location of the proposed works is to the north-west part of the wider prison site, currently used to house the works compound. This area is currently comprised of a single storey stores/workshop building and kennels for the prison's dogs. The site also contains a defunct wind turbine. These building are separated from the wider secure site by a 5.2m high security fence comprising of posts and secure mesh.

### **2.0 Added Value**

- 2.1 Improvements secured at the pre-application stage: Formal pre-application advice was sought from the Local Planning Authority prior to the submission of the application. Objection was not raised to the principle of the development within the Green Belt although it was explained that very special circumstances would need to be presented.
- 2.2 Improvements secured during the course of the application: Improvements were not sought as the application is deemed to be acceptable.
- 2.3 Further improvements could be secured: Further improvements could be sought by way of conditions. A condition restricting the hours of use would be included.

### **3.0 Relevant Planning and Enforcement History**

The planning history for the site is extensive. The majority of the permissions relate to minor developments providing replacement facilities or improvements to existing facilities. The following is a list of the most recent applications related to the site.

07/01130/CDV - Extension to existing reception/admin/kitchen, ground and first with pitch roof extension - Approved

07/02188/F - 9m x 3m x 3m storage container - Approved

08/00203/F - Erection of satellite dish used for inter-prison communication mounted at ground level adjacent to kitchen block having a total height of 3.5 metres - Withdrawn.

08/00705/F - Installation of a 1.8m (in diameter) satellite dish affixed to a 5m lattice tower with approved anti-climb devices. - Approved

08/02394/F Erection of new bicycle shelter for 20 cycles - AC - Approved with Conditions

17/01736/F - New main stores building, hard standing and internal road alterations – Approved with conditions.

#### **4.0 Proposal and Design Approach**

- 4.1 This is a full application for a new single storey workshop building and the relocation of the existing dog kennels. The building would be of a functional flat roof design and cover an area of 1253.6 sqm in footprint. It would be 7m in height. The proposed floor area of the proposed workshop to largely be turned over to the workshop area, fresh produce area and packing area, with ancillary plant rooms, offices, staff rooms and facilities around the room. New security fencing would be constructed around the building at various points. The proposed facility is to provide 90 new prison work spaces for existing prisoners and will be used to accommodate prisoners undertaking food packaging work.
- 4.2 Regarding materials, the building would be a mix of brickwork to the lower portions of the building with composite wall cladding above. Various elements of plant such as air vents/ ducts would feature around the building. The roof would feature a number of windcatchers, rooflights and PV panels. Entrance doors would feature around the building, including vehicle entrance to the east elevation, which would be accessed via a new access route linking up to the rest of the site. New security fencing and gates would be installed to the north of the building and would link up to existing fencing surrounding this part of the prison compound.
- 4.3 In addition it is proposed to relocated the existing dog kennels to the north of the existing works services building. The dog kennel enclosure comprises of four kennels and four rooms to accommodate a general store, food store, laundry and grooming. The buildings would be single storey with a footprint of 111sqm, and surrounded by a 2m high fence. A new footpath would link the

kennels to the front of the site area. A new storage bay would be created to the east of the site adjacent to existing storage containers. Two new storage containers would be relocated to the south of these.

- 4.4 A design and access statement should illustrate the process that has led to the development proposal, and justify the proposal in a structured way, by demonstrating the steps taken to appraise the context of the proposed development. It expects applicants to follow a four-stage design process comprising:  
Assessment;  
Involvement;  
Evaluation; and  
Design.

- 4.5 Evidence of the applicant’s design approach is set out below:

Assessment	The surrounding built-up areas are Banstead located to the south west of the application site and Belmont located to the north and north west of the application site. Both areas are served by a wide range of facilities, have overground rail stations with connection to London and have a wide stock of different housing types. The existing built form of the site consists of accommodation blocks and associated buildings, which are utilitarian and functional in appearance given the use of the site.
	The topography of the area is described as being relatively level with a fall over the wider area to the south east of the application site. The southern and western boundaries are also bordered by a belt of established trees beyond which are open fields.
Involvement	No community consultation is identified as having taken place.
Evaluation	It is not indicated that alternative development options have been considered.
Design	The proposed workshop building is intended is to provide a 90-place new build workshop. This new workshop unit must provide flexible workspace and be a fit for purpose facility. The new workshop will retain the utilitarian appearance appropriate within the context of the wider site and surrounding buildings, rather than create a building of contrasting appearance.

- 4.6 Further details of the development are as follows:

Site area	0.702ha (wider prison site 11.3 ha)
Existing Use	Prison (Use Class C2(A) Secure residential institution)

Proposed use	Workshop (Class E(g)(iii) within the existing prison
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## 5.0 Policy Context

### 5.1 Designation

Metropolitan Green Belt

### 5.2 Reigate and Banstead Core Strategy

CS1(Sustainable Development)  
CS10 (Sustainable Development),

### 5.3 Reigate & Banstead Development Management Plan 2019

Design	DES1
Natural and historic environment	NHE 5 NHE3 NHE5 NHE6 NHE9
Transport, access and parking	TAP1

### 5.4 Other Material Considerations

National Planning Policy Framework  
2021

National Planning Practice Guidance  
Supplementary Planning Guidance

Surrey Design  
Local Distinctiveness Design Guide  
A Parking Strategy for Surrey  
Parking Standards for Development

Other

Human Rights Act 1998  
Community Infrastructure Levy  
Regulations 2010

## 6.0 Assessment

6.1 The application seeks planning permission a new single storey workshop facility and relocation of existing dog kennels. As amended on 20/12/2021.

- Principle of the development within the Metropolitan Green Belt
- Design and character assessment
- Neighbouring Amenity
- Transport matters
- Trees and landscaping
- Archaeology

Impact on the openness of the Metropolitan Green Belt

- 6.2 The proposed building would be single storey and comprise a workshop area, HV room and other ancillary uses, as well as office and training facilities at the first floor. An existing dog kennel, which is currently adjacent to the location of the proposed workshop, would be removed and re-provided elsewhere within the site.
- 6.3 The National Planning Policy Framework 2021 (NPPF) attaches great importance to the Metropolitan Greenbelt, stating under paragraph 137 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. Inappropriate development within the Green Belt is, by definition, harmful to the Green Belt, and should not be approved unless justified by very special circumstances. 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 (paragraphs 147-148).
- 6.4 Paragraph 149 states that there are certain exceptions to this, including (g): limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
- not have a greater impact on the openness of the Green Belt than the existing development; or
  - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
- 6.5 The location of the proposed workshop building would be within the existing developed site of the prison complex, in the same general location as the storage buildings previously granted consent under application 17/01736/F. It is considered that the development would in this instance constitute limited infilling of previously developed land within the Green Belt. Consideration therefore needs to be given as to whether the building would result in a greater degree of harm to openness than the existing development. The proposed workshop would be single storey and have a footprint of 1253.6sq sqm. This would be a large building; however it would be sited within the prison compound surrounded by other buildings of a similar appearance, some of which are considerably large. It is noted that the prison complex is surrounded by a wall of some 6.5m in height. The workshop would be 7m in height, leaving only 0.5m visible above the wall. From many vantage points the building would not be visible. Where it may be visible from more distant vantage points it would be viewed within the context of the wider prison amongst existing buildings.

- 6.6 The existing dog kennels would be relocated from their current position to the north-west of the works services building. Whilst adding additional built form (approx.. 25sqm additional footprint), the existing kennels, which account for a similar amount of built form, are to be removed, therefore the addition of new kennels would result in very minimal impact on openness.
- 6.7 The applicant has argued that, should the proposed development be considered an inappropriate form of development within the Green Belt, there are very special circumstances that would justify the proposal. It is the view applicant within their supporting statement that the proposals are for a facility to deliver vocational training to support prisoners' future rehabilitation once released from prison. Due to the secure nature of the site and the fact that those accessing the new workshop are prisoners it would be unfeasible due to the logistics and the necessary security procedures to provide a similar facility off site on a site that was not within the Green Belt. Given these circumstances the facility could not realistically be provided anywhere but within the existing prison complex. The facility is required to give prisoners skills to assist them in finding work once released from prison. This is considered to be an essential part of prisoner rehabilitation and has been shown to result in significantly lower levels of re-offending. The wider social and public benefits of providing this facility are therefore considered to be of significance and would outweigh any marginal harm to the openness of the Green Belt. Whilst this is agreed, Officers conclusions are that the site already constitutes a built up development such that this infilling would not further harm the openness of the green belt meaning the proposal would not constitute inappropriate development for which very special circumstances are required.
- 6.8 In light of the above considerations the proposed development would be appropriate within the Green Belt and would not result in significant harm to the level of openness of the site. The proposal is therefore deemed to meet the requirements of the NPPF 2021 and Development Management Plan 2019 (DMP) Policy NHE5.

#### Design and character assessment

- 6.9 The proposed building would be large and of a flat roof design, sitting on a roughly square shaped footprint. Policy NHE5 of the DMP 2019 with regard to development within the Green Belt requires the design of new development to respect the character of the area. The prison is a developed site within the Green Belt and therefore does not necessarily reflect the rural character typically exhibited in such areas. The utilitarian appearance of the building and choice of buildings would be appropriate within the context of the wider site, where there are many buildings of a similarly functional design. The location of the building would make use of an underutilised part of the site. Its comparatively low scale compared to a number of other buildings within the site would not cause it to be unduly prominent.

- 6.10 The proposal is therefore not considered to be inappropriate in terms of design and would comply with Policies DES1 and NHE5 of the DMP 2019 in this regard.

Neighbouring Amenity

- 6.11 The location of the building would be sited a considerable distance from any nearby residential properties (the nearest being located on Freedown Lane approx..330m to the south), therefore it is not considered there would be harm to residential amenity. The proposal would comply with Policy DES1 in this regard.

Transport matters

- 6.12 The proposal would give rise to minimal changes to the existing transport arrangements. The existing access to this part of the site would be modestly altered and a proposed new stretch of access created to allow vehicular access to/ from the new workshop building. This would not be objectionable and would allow for connectivity to the wider prison site. Vehicular access is from the main prison gate to the south of High Down Lane. An 18.5t delivery vehicle and a fire tender are the only vehicles that will require direct access to the site. Delivery vehicles will reverse to rolling shutters where they will load/unload. Delivery vehicles will egress the site in forward gear.
- 6.13 Pedestrian access for staff to the wider prison site is from the prison gatehouse to the south of High Down Lane. Once pedestrians have passed security checks at the gatehouse they will pass two gates inside the prison. Staff will use the shared vehicle and pedestrian route to the application site to the north of the wider prison site. There is a marked pedestrian walkway to the south of the prison gatehouse which leads to a further gate providing access to the compound and waste compaction area to the east of the site. Pedestrians will walk through the compound and waste compaction area to the new workshop building. The pedestrian access is located to the north of the site and a ramp is provided. Trips from servicing vehicles to the new site are expected to be infrequent therefore it is not likely that there would be conflict arising between vehicles and pedestrians from a safety viewpoint.
- 6.14 As stated earlier in the report, the proposed workshop would be overseen by 15 third party members of staff. It is anticipated that 11 of these staff members would be travelling by car. It is not proposed to provide additional parking to these staff members, who will be allocated spaces within the main prison carparks to the north of the complex. Therefore it not the view that scheme would result in harm to the existing parking situation. It is anticipated that the use of sustainable modes of travel, as well as encouraging the use of public transport, would form part of the future travel plan.
- 6.15 In light of the above it is considered that the scheme would not give rise to harm with regard to highway considerations and would therefore comply with Policy TAP of the DMP 2019.

### Trees and landscaping

- 6.16 There are no trees of significance within the site, and any green areas within the prison generally comprised of lawn. It is not proposed to incorporate landscaping in to the proposed scheme. This is considered necessary and sensible bearing in mind that the need to create a secure environment limits the scope to introduce soft landscaping or habitat enhancements, due to it potentially creating opportunities for prisoners to conceal themselves. The landscaping is therefore limited to simple low maintenance and robust hard landscaping providing safe access routes to the proposed workshop and relocated dog kennels.

### Archaeology

- 6.17 The application has been supported by a Archaeology Desk Based Assessment (DBA). There are no specific archaeological restrictions on the site. The assessment concludes that the site is unlikely to yield finds of significance relating prehistoric, Roman, Saxon, Medieval and post medieval periods, the likelihood of which is considered to be low or negligible.
- 6.18 The site remained undeveloped farmland until 1873 when the Middlesex County Council purchased the Hundred Acres Farm in order to build a mental asylum. The building opened in 1877 and was almost self-sufficient with its own farm, workshops, gasworks, infirmaries, a chapel, a burial ground and sports grounds. Cartographic sources and building plans show that the proposed new workshop was situated partly over the chapel, two of the wards and the corridors linking the administration block to the wards. The hospital increased in capacity over the course of the late 19th and early 20th centuries and during the Second World War it was used as a military camp and later a tuberculosis unit. By the time the hospital closed in 1986 the number of beds had been greatly reduced and the building was in need of refurbishment. Nearly all of the buildings were demolished, and two new prisons were opened in 1992. Therefore, the likelihood of encountering late post-medieval and modern finds and features is considered to be low to moderate. If such features are encountered they are likely to relate to the foundations of the building which previously occupied the site.

## **CONDITIONS**

1. The development hereby permitted shall be carried out in accordance with the following approved plans:

<b>Plan Type</b>	<b>Reference</b>	<b>Version</b>	<b>Date Received</b>
Site Layout Plan	203502-5061- CTG-034-00-DR- A-0002-S2-P02- D0100	P02	22.11.2021
Other Plan	203502-5061- CTG-034-00-DR-	P03	22.11.2021

	A-0003-S2-P03-D0100		
Site Layout Plan	203502-5061-CTG-034-00-DR-A-0004-S2-P06-D0100	P06	22.11.2021
Floor Plan	203502-5061-CTG-034-00-DR-A-0011-S2-P06-D0100	P06	22.11.2021
Roof Plan	203502-5061-CTG-034-RF1-DR-A-0013-S2-P03-D0100	P03	22.11.2021
Elevation Plan	203502-5061-CTG-034-ZZ-DR-A-0101-S2-P06-D0100	P06	22.11.2021
Floor Plan	203502-5061-CTG-XXX-00-DR-A-0018-S2-P02-D0100	P02	22.11.2021
Elevation Plan	203502-5061-CTG-034-ZZ-DR-A-0102-S2-P05-D0100	P05	22.11.2021
Floor Plan	203502-5061-CTG-XXX-ZZ-DR-A-0014-S2-P03-D0100	P03	22.11.2021
Other Plan	203502-5061-BRL-34-XX-DR-C-1111-S2-P02-B1100	P02	22.11.2021
Elevation Plan	203502-5061-CTG-XXX-ZZ-DR-A-0015-S2-P02-D0100	P02	22.11.2021
Elevation Plan	9-S2-P01-D0100	P01	22.11.2021
Location Plan	203502-5061-CTG-034-00-DR-A-0001-S2-P03-D0100	P03	22.11.2021

Reason:

To define the permission and ensure the development is carried out in accord with the approved plans and in accordance with National Planning Practice Guidance.

2. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51 (1) of the Planning and Compulsory Purchase Act 2004

3. If, prior to or during development, ground contamination is suspected or manifests itself then no further development (unless otherwise agreed in writing by the Local Planning Authority) shall be carried out until the developer has submitted an appropriate remediation strategy to the Local Planning Authority and the written approval of the Local Planning Authority has been received. The strategy should detail how the contamination shall be managed.

The remediation strategy shall be implemented in accordance with such details as may be approved and a remediation validation report shall be required to be submitted to Local Planning Authority to demonstrate the agreed strategy has been complied with.

Should no ground contamination be readily identified during the development, confirmation of this should be provided in writing to the Local Planning Authority.

Reason: To comply with the Reigate and Banstead Local Plan Development Management Plan 2019 (Policy DES9 Pollution and contaminated Land) and the NPPF.

4. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
  - a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
  - b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy.
  - c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.). Confirmation is required of a 1m unsaturated zone from the base of any proposed soakaway to the seasonal high groundwater level and confirmation of half-drain times.

- d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
- e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site, and comply with Policy CCF2 of the Development Management Plan 2019.

- 5. Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS, and comply with Policy CCF2 of the Development Management Plan 2019.

- 6. The materials to be used in the construction of the external surfaces of the development shall be constructed in accordance with the materials as specified on the approved plans and there shall be no variation without prior approval and agreement in writing with the Local Planning Authority.

Reason: To ensure that a satisfactory external appearance is achieved of the development with regard to Reigate and Banstead Development Management Plan 2019 policy DES1.

## **INFORMATIVES**

- 1. In seeking to address and discharge the “contamination remediation” condition above, the applicant’s attention is drawn to the fact that the application site is situated on or in close proximity to land that could be potentially contaminated by virtue of previous historical uses of the land.

Visual and olfactory evidence of contamination can take many forms including hydrocarbon or solvent odours, ash and clinker, buried wastes, burnt wastes/objects, metallic objects, staining and discolouration of soils, oily sheen on ground water and fragments of asbestos containing materials

(ACMs) (Note: this list is intended to be used as a guide to some common types of contamination and is not exhaustive).

In seeking to address the condition a photographic record of works should be incorporated within the validation report. Should no ground contamination be identified then a brief comment to this effect shall be required to be provided in writing to the Local Planning Authority.

The Local Planning Authority cannot confirm that the condition has been fully discharged until any validation report has been agreed.

2. Your attention is drawn to the safety benefits of installing sprinkler systems as an integral part of new development. Further information is available at [www.firesprinklers.info](http://www.firesprinklers.info).
3. The applicant is encouraged to provide renewable technology within the development hereby permitted in order to reduce greenhouse gas emissions. Further information can be found on the Council website at: Climate Change Information.

## **REASON FOR PERMISSION**

The development hereby permitted has been assessed against the NPPF 2021 and Development Management Plan policies DES1 NHE3 NHE5 NHE6 NHE9 TAP1 material considerations, including third party representations. It has been concluded that the development is in accordance with the development plan and there are no material considerations that justify refusal in the public interest.

## **Proactive and Positive Statements**

The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development where possible, as set out within the National Planning Policy Framework.