

**RESERVED MATTERS
APPLICATION FOR PARCEL
A2 AT GREAT WILSEY PARK,
HAVERHILL
PLANNING STATEMENT**

Site name: Great Wilsey Park – Housing Parcel A2
Client name: Redrow Homes
Type of report: Planning Statement

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TABLE OF CONTENTS

1.0	Preface	Error! Bookmark not defined.
2.0	Introduction	4
3.0	The Site and Surrounding Area	5
4.0	Overview of the Proposed Development	8
5.0	Planning Policy Context	9
6.0	Consultation	Error! Bookmark not defined.
7.0	Affordable Housing Statement	Error! Bookmark not defined.
8.0	Planning Assessment	12
9.0	Conclusion	13

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Bidwells LLP on behalf of Redrow Homes Eastern Ltd referred hereafter as “the applicant”.
- 1.2 The Planning Statement supports an application to amend necessary details of the approved Reserved Matters Consent (DC/10/1940/RM) following the updated Building Regulations (specifically Part L) and an amendment to the apartment blocks to the south of the parcel, to change this unit type to terraced houses.
- 1.3 This statement draws together the various assessments, which inform the preparation of the scheme, and which have been submitted as part of the Reserved Matters Application (RMA) in order to assist the Local Planning Authority in determining the submission. It has had specific regard to the documentation, specification and other standards that have already been approved for this development through the grant of Outline Planning Permission and the subsequent Reserved Matters Approval.
- 1.4 For ease of reference, this statement is structured as follows:
- Section 3 describes the application site and surroundings, sets out the background and planning history to the proposed development.
 - Section 4 provides an overview of the submission proposal.
 - Section 5 considers the relevant planning policy framework against which the proposals will be considered.
 - Section 6 includes details of the pre-application discussions that have taken place with the Councils, stakeholders and consultation with the local community prior to the submission.
 - Section 7 sets out the affordable housing proposals (Affordable Housing Statement).
 - Section 8 provides an assessment of the submission proposals having regard to the outline approval and in respect to its own context, setting out the case in support of approval.
 - Section 9 draws together the above, providing overall conclusions in relation to the proposals.
- 1.5 Full details of all the submission documents and drawings which accompany the formal submission are provided in the accompanying Schedule of Submission (see the accompanying cover letter).

2.0 The Site and Surrounding Area

- 2.1 The Site (Parcel A2) is located to the east of the town of Haverhill, to the south of Haverhill Road and north of Chalkstone Way. Parcel A2 is located to the east of the completed northern access road into Great Wilsey Park. As a whole, the outline consent comprises 168 hectares of land. The Site's current land use comprises open land and ancillary uses associated with the wider construction activities at Great Wilsey Park.
- 2.2 The Site benefits from Outline Planning Consent (reference no. DC/15/2151/OUT) for, *'Residential development of up to 2,500 units (including Use Classes C2/C3), two primary schools, two local centres for retail, commercial and employment use (Use Classes A1/A2/A3/A4/A5, B1 and D1/D2), open space and landscaping and associated infrastructure that form Great Wilsey Park, Haverhill.*
- 2.3 Under this planning permission, a series of parameter plans were approved including:
- Land Use
 - Building Heights
 - Density
 - Road Hierarchy
 - Public Rights of Way
- 2.4 The first residential Reserved Matters Application (RMA) was approved in 2020 under reference number DC/19/0834/RM for Parcels A1, A2 and A8 (please refer to the land use parameter plan at Appendix 1, for the location of these parcels).
- 2.5 There are a large number of existing public footpaths that cross the wider development site of Great Wilsey Park, however, there are no existing Public Rights of Way (PROW) that enter into or run adjacent to the application site of Parcel A2. Under the Outline Permission, a number of proposed PROW were approved under the PROW Parameter Plan (revision F). These included footpaths which run along each boundary of the site.
- 2.6 The site is not located in a conservation area, and there are no listed buildings within close proximity of the site. The moated site at Great Wilsey Farm is a scheduled ancient monument located approximately 400m from the south-eastern corner of the site. This scheduled monument is located behind a mature hedgerow and hidden from view from the parcel by the Great Field Plantation Woodland.
- 2.7 The Environment Agency Flood Map for Planning demonstrates that the Site is located within Flood Zone 1.
- 2.8 There are no tree preservation orders on or near the application Site.

A2 Housing Parcel

- 2.9 This Reserved Matters Application relates to the parcels known as A2 and comprises approximately 3.58ha of land.

Site History

APPLICATION REFERENCE	DESCRIPTION	DECISION
DC/14/2276/EIASCO	Scoping Opinion Under Environmental Impact Assessment Regulations 2011 - Proposed development of approximately 2,500 residential units, local employment uses, education, community and leisure facilities, public open space and recreation facilities in Land North East of Haverhill known as Great Willsey Park	30 Mar 2015
DC/15/2151/OUT	Residential development of up to 2,500 units (including Use Classes C2/C3), two primary schools, two local centres for retail, commercial and employment use (Use Classes A1/A2/A3/A4/A5, B1 and D1/D2), open space and landscaping and associated infrastructure that form Great Wilsey Park, Haverhill	15 August 2018
DC/19/0224/FUL	Planning Application - Provision of temporary holding area for storage of materials and machinery associated with the construction of Great Wilsey Park, including the siting of a portacabin to accommodate welfare facilities	06 September 2019
NMA(B)/15/2151	Non-material amendment to DC/15/2151/OUT - Amend condition 3 to replace the alternative road hierarchy parameter plan (drawing reference 5055-ES-04 F) with a new alternative road hierarchy parameter plan and replace the alternative building heights parameter plan (5055-ES-03 E) with a new alternative building heights parameter plan.	12 November 2019
NMA(C)/15/2151	Non-material amendment to DC/15/2151/OUT - Minor amendments to the Haverhill Road roundabout general arrangement including (i) relocation of the access to the service road for existing properties and removal of the right-hand turn lane (ii) provision of attenuation basins for surface water run-off to satisfy LLFA requirements (iii) relocation of the southern cycleway	12 November 2019
DC/19/0225/FUL	Planning Application - Temporary construction access off Chalkstone way associated with wider work at Great Wilsey Park	11 February 2020
DC/19/0834/RM	Reserved Matters Application - Submission of details under Outline Planning Permission DC/15/2151/OUT (Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure)	28 May 2020

DC/19/1940/RM	Submission of details for the reserved matters access, appearance, landscaping, layout and scale for 499 dwellings (parcels A1, A2 and A8) and associated internal roads, car parking, landscaping, amenity and public open space.	23 September 2020
NMA(A)/19/1940	Non material amendment to DC/19/1940/RM - amendments to house types in parcels A2 and A8 and associated changes in the layout and soft landscaping	25 July 2021
NMA(B)/19/1940	Application for a Non-Material amendment for a change in surfacing materials on a small number of private drives and additional planting on Parcel A8 pursuant to Reserved Matters approval DC/19/1940/RM as amended by NMA(A)/19/1940, at Great Wilsey Park, Haverhill	12 June 2023
DC/20/0358/RM	Reserved Matters Application - Submission of details under Outline Planning Permission DC/15/2151/OUT - the means of access appearance, landscaping, layout and scale for the HV Cable and associated infrastructure to support the delivery of the first phase	Pending determination

3.0 Overview of the Proposed Development

- 3.1 This application seeks consent for the Reserved Matters pursuant to the outline consent (DC/15/2151/OUT). The Reserved Matters (RM) include appearance, landscaping, layout, and scale. Access remains as approved under Infrastructure RM consent. Specifically, this submission seeks consent for the change in the apartment blocks to individual dwelling houses on Parcels A2.
- 3.2 The description of development is:
- 3.3 *“Reserved Matters application for the formalisation of necessary changes to the approved house plots and the amendment to the approved apartment units to provide terraced housing under Reserved Matters Consent reference DC/19/1940/RM, pursuant to Outline Planning Permission DC/15/2151/OUT, following recent amendments to the Building Regulations. The Reserved Matters include appearance, landscaping, layout and scale and for the discharge of Outline Conditions 6, 8 and 28.”*
- 3.4 Access remains unchanged from the approved plans under the Infrastructure RM Consent DC/19/0834/RM. A summary of the proposed changes are set out below:
- At the Gateway area (along the southern edge, as illustrated in the Steet scenes) we have replaced the apartments with terraced houses.
 - There are some instances where plots have been substituted with different house types, to ensure compliance with the up-to-date Part L of the Building Regulations (June 2022). These house types provide better insulation and energy performance and have been provided with an air source heat pump.
 - The proposals provide a larger number of 3 bed units and less 4 bed units, along with the introduction of 10x 5 bed units. An accommodation schedule has been provided as part of the submission which details these changes.
 - The bin collection points (BCPs) have been located as close as possible to adoptable surfaces where outlying units lie beyond the requirements for the Suffolk County Refuse Guidance.
 - Landscaping updates have been made to reflect the changes outlined above and to coordinate with the landscape detail identified in the approved layout.
- 3.5 The option to submit a Minor Material Amendment (Section 73 of the Town and Country Planning Act (1990)) application was discussed with officers at West Suffolk. It was the view of the planning officers that there was no ability to submit a S73 application to a Reserved Matters Consent, as the approval was not considered to be a planning permission. A review of recent case law provided insufficient evidence to the contrary and it was therefore agreed that the changes now sought would be made by way of a Reserved Matters Approval.

4.0 Planning Policy Context

- 4.1 The following section sets out the Local and National Planning Policy Context against which the application has been assessed on its compliance with the material policy considerations.

Local Planning Policy

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “*if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*”

- 4.3 The Local Statutory Development Plan consists of the following documents:

- Core Strategy (adopted 2010)
- Haverhill Vision 2031 (adopted 2014)
- Joint Development Management Policies (2015)
- Proposals Map (2015)

- 4.4 The Joint Development Management Policies Document was adopted in February 2015 and post-dates the grant of outline planning permission on the Site. The plan sets out the vision, policies and proposals for the future development and land use in West Suffolk until 2031.

- 4.5 West Suffolk District Council is in the process of updating their Local Plan. The latest Local Development Scheme indicates a pre-submission consultation (regulation 19) will take place in January 2024 with an anticipated adoption in spring 2025. While the Local Plan is progressing and the policy direction is starting to form, it is considered that the emerging Local Plan should hold little weight in the policy considerations. For the purpose of the planning assessment, the proposals have been assessed against the existing adopted Local Plan documents.

- 4.6 Those policies contained within the plan that are considered to be of relevance to the current proposals, specifically relating to planning requirements where the standard has not already been set in the outline permission, are listed below and an assessment of the submission proposals against the requirements of these policies, and other material considerations, is contained at section 7 of this Statement.

- 4.7 Notwithstanding the Outline Planning Permission that is in place, there are a number of policies within these documents which are of relevance to the determination of this application.

Core Strategy (adopted 2010)

- CS2 Sustainable Development
- CS3 Design and Local Distinctiveness
- CS5 Affordable Housing
- CS7 Sustainable Transport
- CS12 Haverhill Strategic Growth

Haverhill Vision 2031 (adopted 2014)

- HV1 Presumption in Favour of Sustainable Development
- HV4 Strategic Site – North-East Haverhill

- HV18 Green Infrastructure in Haverhill

Joint Development Management Policies (adopted 2015)

- DM2 Creating Places – Development Principles and Local Distinctiveness
- DM7 Sustainable Design and Construction
- DM13 Landscape Features
- DM22 Residential Design
- DM46 Parking Standards

National Planning Policy

4.8 The National Planning Policy Framework (NPPF) was published in March 2012 and subsequently revised in July 2018, February 2019, July 2021 and most recently in September 2023.

- The Framework sets out the Government’s planning policies for England and how these should be applied (paragraph 1). The purpose of the planning system is to contribute to the achievement of sustainable development (para 7). Achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): An Economic Objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A Social Objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.
- An Environmental Objective – to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.9 Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area (para 9).

Other Material Considerations

4.10 The following supplementary planning documents (SPDs) are considered relevant to this submission:

- West Suffolk Public Open Space Assessment (December 2021)

4.11 The Building Regulations 2023 (Part L) form part of the material consideration for the determination of this application.

Outline Planning Permission

4.12 Under the Outline Planning Permission, a series of Parameter Plans were approved, guiding the development as it comes forward for Reserved Matters Consent. These included:

- Land Use
- Density
- Building Heights
- Road Hierarchy
- Public Rights of Way

4.13 On approval of the Outline Permission, a S106 Agreement was signed setting various requirements for the delivery of matters including Affordable Housing. This set out a requirement of 30% of overall affordable offering, with 23% to be delivered under the first 850 dwellings. This Reserved Matters Application is therefore required to deliver 23% of the total mix as affordable tenure.

5.0 Planning Assessment

5.1 This section of the Statement provides an assessment of the key planning considerations associated with the proposed development in the planning policy context set out in the previous section. In this instance, the key planning considerations raised by the application proposals are:

- Compliance with the Outline Consent and approved Parameter Plans
- Urban Design including Quantum, density and mix
- Landscaping
- Conditions
 - Refuse and Recycling
 - Soft Landscaping and
 - Parking

5.2 These matters are assessed in turn below.

Compliance with the Outline Consent

5.3 Under the Outline Consent, a series of Parameter Plans were approved to guide the design of the layouts under the Reserved Matters Applications. These included:

- Land Use – Revision O
- Building Heights – Revision F
- Road Hierarchy – Revision G
- Public Rights of Way – Revision F
- Density – Revision D

Building Heights

5.4 The proposals include an alteration to the building heights in the south gateway area, through the replacement of the apartment blocks with terraced housing. A non-material application was submitted in 2019 to amend the Building Heights Parameter Plans to allow for a taller building height (from up to 2.5 storeys to **up to** 3 storeys) in this location. The amendment from a 3-storey apartment block to 2-storey terraced housing remains in line with the approved parameter plan which allows for up to 3 storeys (12m).

Density

5.5 The density for parcel A2 remains in compliance with the Density Parameter Plan, with a density of 33.9 dwellings per hectare (dph) against a parameter range of 30-35 dph.

Land Use, Road Hierarchy and Public Rights of Way

5.6 There are no proposed changes to the land use, road hierarchy or public rights of way from the approved layouts (under reference DC/19/1940/RM) and therefore remain in compliance with the approved parameter plans.

Urban Design

- 5.7 The established urban design principles under the existing RM Consent have been retained through the amendments. The replacement of the apartments with houses retains a clear frontage to the primary street whilst reducing the height of built form and providing residents with private amenity space.
- 5.8 Policies CS2 and CS3 of the Core Strategy (2010) set out that a development must create a safe environment that contributes to local distinctiveness and character. Proposals for new development must further create and contribute to a high quality and sustainable environment. Policy DM2 of the Joint Development Management Policies (2015) similarly sets out that development should recognise and address the key features and characteristics of the area. Policy DM22 Residential Design states that designs should be specific to the scheme and based on an analysis of the existing buildings.
- 5.9 The terraced units have been arranged in a split design, with those that directly relate to the principal street (no bus route) into the parcel being stepped forward to ensure a strong active frontage, with parking to the rear. To avoid an extensive parking court and to create some variation to the street scene, some of the terraced units have been pushed back from the principal street (bus route) with a private drive to the front of the units.
- 5.10 Some house types have been altered to ensure the required percentage of affordable housing is delivered. A plot schedule detailing which plots have changed and setting out a comparison has been provided as part of the application to aid the assessment.
- 5.11 Minor changes have also been made to the other house plots to ensure they meet the requirements of the Building Regulations (specifically Part L). The principles established under the existing RM consent are maintained, with all east-west connectivity routes as per the approved layouts and the “car-free” spaces. Appropriate natural surveillance has been designed in by orientating the houses to front onto the spaces and where required, side elevation windows providing an outlook over the space.
- 5.12 The proposals therefore accord with Policies CS2 and CS3 of the Core Strategy (2010) and Policies DM2 and DM22 of the Joint Development Management Policies (2015).

Housing Provision

- 5.13 Policy CS5 Affordable Housing of the Core Strategy (2010) states that where housing is proposed, developers are expected to integrate land for affordable homes which should come forward in parallel with market homes.
- 5.14 The signed S106 agreement requires the RMAs for the first 850 dwellings to deliver 23% of the proposed units in an affordable tenure. This Reserved Matters falls within the first 850 dwellings, and therefore is required to provide 23% of the total mix as an affordable tenure.
- 5.15 The total number of units under this RMA are 118. Parcel A2 reads as both the northern and southern parts of the parcel. It is therefore considered that the affordable mix should consider both the north and southern parts of the parcel, the mix therefore reflects this.
- 5.16 The application proposes 23% of units in an affordable tenure. For the entire parcel of A2 (173 units in total) 41 affordable units are provided, against a requirement of 39 units.
- 5.17 An updated housing mix schedule has been provided below against the approved to illustrate the changes to the house types.

BEDROOMS	PROPOSED MARKET UNIT NUMBERS	PROPOSED AFFORDABLE UNIT NUMBERS
1	0	12
2	1	23
3	54	4
4	17	2
5	5	0
TOTAL	77	41
RM TOTAL	118	

Landscaping

- 5.18 Policy DM13 Landscape Features of the Joint Development Management Policies (2015) sets out that all proposals for development should be sympathetic to the character of the landscape.
- 5.19 An updated Landscape General Arrangement Plan has been provided to illustrate the following key principles established in the Residential Reserved Matters Application (DC/19/1940/RM). There have been no changes to the overall strategy used for the soft and hard surfaces and boundary treatments, but minor amendments have been made to bring the new house types into the approved landscape strategies and to pick up on discrepancies where needed. These are summarised below:
- The amenity planting has been simplified around the front of all units to give residents access to their own lawn space.
 - The Hedges on the Site have been removed where there is a wall proposed and replaced with a range of amenity and native planting mixes including lavender, roses, holly and rosemary. This occurs to the eastern side of plot 4, along the secondary street.
 - The surface material proposed in the location of the Bin Collection Points has been simplified to match adjacent surfaces.
- 5.20 The proposals therefore accord with Policy DM13 Landscape Features of the Joint Development Management Policies (2015) as they align with and enhance the character of the landscape.

Plot Substitutions

- 5.21 Following the update to the Building Regulations, specifically Part L, conservation of fuel and power, Volume 1 (2023), the approved house types required an update to ensure they comply with the new regulations. The following changes have been made to bring the proposals in line and to improve the energy performance of the houses:

- Table 2 sets out the plot substitutions made due to the need to ensure the correct house types are being built with the highest energy performance level. In some cases, this required a change to the house type.
- A majority of the plots simply required an increase in the insulation to the house type approved.
- All plots are now served by an Air Source Heat Pump, in replacement of a gas boiler.

5.22 The plot substitutions made are set out below:

PLOT NUMBER	APPROVED HOUSE TYPE	PROPOSED HOUSE TYPE
17-18 (15-16)	1B2P	Spey
19 (17)	Tavy	Trent
20 (18)	Tavy	Trent
21 (19)	Tavy	Trent
22 (20)	Tweed	Tyne
23 (21)	Tweed	Tyne
32 (29)	Tavy	Trent
33 (27-28)	1B2P	Trent
35 (25)	Tavy	Trent
36 (24)	Tavy	Trent
37-38 (22-23)	1B2P	Spey
39 (35)	Lincoln 3	Stamford
40 (34)	Lincoln 3	Stamford
41(33)	Stratford	Lincoln 3
42 (32)	Warwick	Lincoln 3
43 (32)	Warwick	Lincoln 3
44 (31)	Warwick	Lincoln 3
45 (30)	Stratford lifestyle	Lincoln 3
46 (60)	Stamford	Trent

47 (61)	Stamford	Trent
48 (62-70)	Apartment Block	Trent
55 (51)	Tavy	Trent
56 (50)	Tavy	Trent
64 (42)	Stratford	Stratford Lifestyle
66 (40)	Welwyn	Hampstead
71 (97)	Leamington Lifestyle	Cambridge
73 (95,94)	Tavy	Oxford Lifestyle
74-79 (71-79)	Apartment Block	Spey, Trent
80 (80)	Dart	Trent
81 (81)	Dart	Trent
82 (82)	Dart	Stour
83 (83)	Dart	Stour
84 (84)	Lincoln 3	Stour
85 (85)	Lincoln 3	Stour
86 (86)	Harrogate	Trent
90,91 (87)	Ledsham	Letchworth
92 (88)	Amberley	Harrogate
93 (89)	Stamford	Oxford
102	Henley	Hampstead
103	Marlborough	Richmond
104	Henley	Hampstead
105	Marlborough	Richmond
106	Henley	Hampstead

Conditions

- 5.23 The following conditions from the outline approval are being sought for discharge as part of this application:
- Condition 6 – Refuse and Recycling
 - Condition 8 – Soft Landscaping
 - Condition 28 – Parking
- 5.24 Policy DM2: Creating Places – Development Principles and Local Distinctiveness of the Joint Development Management Policies (2015) states that proposals should include, where necessary, appropriate refuse and recycling facilities. In line with the requirements of this policy, the details submitted as part of Condition 6 are required to formalise the locations of the bin stores within Parcel A2. The refuse strategy plan (P23-16787_DE_01__22) sets out where Bin Collection Points (BCP) would be required and the distances from the kerbside. There is a maximum drag distance of 30m for the Occupier and a maximum drag distance of 25m for the operatives. Where possible the operative collection has been designed to be kerbside but there are a few instances with BCP are required.
- 5.25 Policy DM13: Landscape Features of the Joint Development Management Policies (2015) outlines that developments should be sympathetic to the character of the landscape. Condition 8 is submitted to formalise some of the conflicts that will have occurred with the changes in the housing plots and bin store locations. A site wide review has been undertaken to ensure these conflicts have been addressed and updated planting plans have been submitted as part of this application to demonstrate compliance with policy, and the retention of the agreed landscape features, including the pocket park and east-west pedestrian/cycle connections.
- 5.26 Policy DM46 Parking Standards of the Joint Development Management Policies (2015) says that proposals will be required to provide appropriately designed and sited car and cycle parking and Policy CS7 Sustainable Transport of the Core Strategy (2010) sets out that proposals should promote a high quality and sustainable transport system. Parking is being provided in line with the consented layout and as per the requirements set out in the Suffolk Guidance for Parking Technical Guidance (2019). Condition 28 is submitted to formalise the associated parking changes following the minor plot substitutions. The following parking figures (as set out on drawing number P23-1687_DE_01__23) are now provided:
- 219 total allocated spaces (previously 216)
 - 27 visitor parking spaces (previously 18)

6.0 Conclusion

- 6.1 This Planning Statement has been prepared by Bidwells LLP on behalf of Redrow Homes Ltd in support of a Reserved Matters Application submitted to West Suffolk District Council to formalise various amendments required to the approved RM under reference DC/19/1940/RM, following updates to the Building Regulations 2010 (2023 Amendments) Part L.
- 6.2 The proposals constitute a material change to the apartment blocks and a series of non-material changes to other house types to bring them in line with the requirements of Part L. The overall strategies established under the RM Consent are maintained at a high quality and are in accordance with the approved Outline Consent and Parameter Plans and the local and national material policy considerations.
- 6.3 The changes provide significant improvements to the energy performance of the homes making them more sustainable and efficient, helping to meet the clear and prominent direction of local and national policy for sustainable development, in addition to reducing overall energy costs for the occupier. It is considered that the benefits derived from the improvements are substantial and dramatically outweigh any perceived harm generated from the change, which is considered to be minimal if not di minimis.
- 6.4 It is considered that the proposals under this RMA do not alter or affect the delivery of the requirements of the S106 and the Outline Consent (DC/15/2151/OUT).
- 6.5 Overall, the proposals are considered to constitute sustainable development and accord with the up-to-date development plan. In accordance with paragraph 11 of the NPPF, the proposals should therefore be approved without delay.

APPENDIX 1

LAND USE PARAMETER PLAN
