

PLANNING APPLICATION REPORT

Case Officer: Gemma Bristow

Parish: Ashprington **Ward:** West Dart

Application No: 2274/19/FUL

Agent/Applicant:

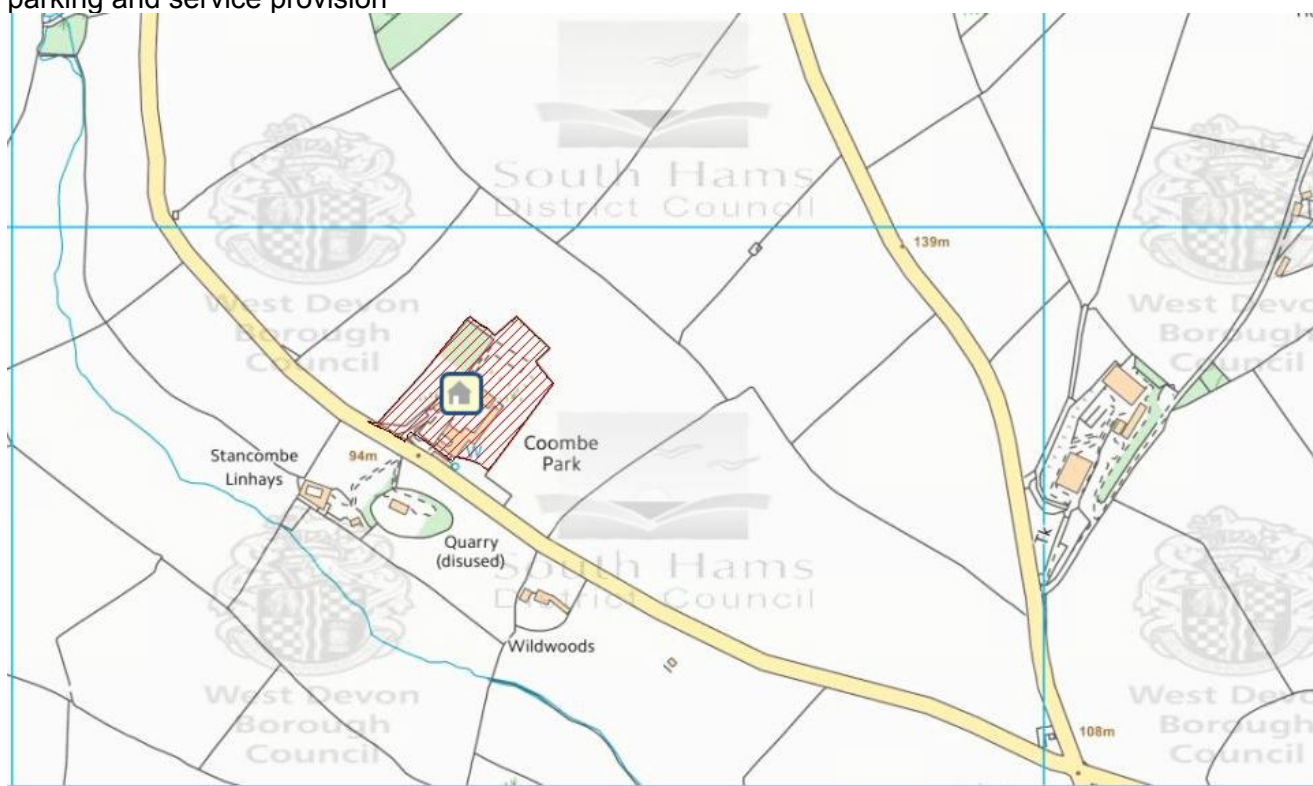
Mr Phillip Yunnie Gillespie Yunnie Architects
The Lower Tweed Mill
Shinners Bridge
Dartington, Totnes
TQ9 6JB

Applicant:

Mr J English Coombe Park RBC Ltd
Coombe Park Rural Business Centre
Ashprington
Totnes
TQ9 7DY

Site Address: Coombe Park, Ashprington, TQ9 7DY

Development: Refurbishments and extension of existing office/studio/workshop building with the construction of new two-storey office/studio/workshop building and associated additional parking and service provision



Reason item is being put before Committee

Cllr McKay has called this application to Committee as he considers the proposal provides for a real need that is not properly addressed in the Joint Local Plan.

Recommendation:

Refuse

Reasons for refusal:

1. The proposed additional floorspace of this business park would result in unsustainable development by virtue of a resultant increase in private motor vehicle journeys, and without overriding justification to support the proposal in light of the current level of supply of employment land in the Plan Area contrary to policies SO1, SPT1, SPT2, SPT4, TTV1,

Key issues for consideration:

Principle, design, landscape, highways, low carbon, drainage

Site Description:

Industrial park located between the A381 on the outskirts of Totnes and Ashprington Cross. The site is bounded by open countryside on north, east and west and to the south of the adjoining road is Listed Stancombe Linhays.

The Proposal:

Erection of new two-storey block of units (Block 2), comprising four units on the ground floor and four further units at first floor, 816sq.m of new floorspace. Each 100 sq.m with separate toilet within each unit. 30.1m wide by 14.7m deep and 8.4m high to ridge.

The existing units to the east of the site (Block 1) shall be refurbished and extended by creating a new first floor, providing 498sq.m of new floorspace. The remodelled ground floor would have three units and the extended first floor five smaller units, each with separate toilet facilities. 8.3m to ridge to butterfly roofs (2.8m above existing roof height).

Existing floorspace:	1,250sq.m
Additional floorspace proposed	1,314sq.m
Total floorspace	2,564sq.m

Creation of additional parking for 29 vehicles, including two disabled spaces.

Felling of a row of Ash trees (20 stems) on bank behind Block 1 and felling of a further three trees to rear of proposed Block 2.

The application is supported by the following documents:

Travel Statement prepared by Bellamy Transport Consultancy.

The report concludes the additional traffic generated by the development would be low (1 vehicle every 6 mins during peak hours) and the existing road network is considered to have capacity. Site access is considered acceptable.

Energy Statement prepared by Delta Green Environmental Design.

States the development would provide a 48% reduction in carbon emissions, via heating the units by air source heat pumps, although noting that ASHP are not shown on the plans. It is noted that solar PV is not proposed to mitigate the energy demands of the ASHP as the carbon reduction target has already been exceeded.

Ecological Impact Assessment, prepared by Orbis Ecology

The report concludes the application would result in a loss of a total of approx 0.1ha of semi-improved grassland. Impacts to bats, reptiles and nesting birds will require mitigation, in the form of a lighting strategy. No other significant impacts identified. Compensation for lost habitat will be from the restoration of the grassland to species rich meadow and a pond created for wildlife resulting in a net gain of 2.67 biodiversity of units (30.65%).

Noise Impact Assessment, prepared by ACT Acoustics.

The report concluded that if the noise from each of the new units is limited to 84 dBL, noise at Coombe farmhouse should be at or below background noise. Noise levels from the existing furniture

manufacturer within Block 1 not audible at boundary of Coombe farmhouse if doors to Block 1 are closed.

Statement from Rendalls Surveyors

Experience of demand for workspace in the area and the pandemic has not diminished this demand. States limited supply of E(g) (formerly B1 B2 and B8), but particularly general industrial. Undertook a review of space available to south-east of A38 for units under 275sq.m, Exeter and Plymouth were excluded from survey. Survey found 980sq.m of general industrial floorspace, with 214sq.m under offer. A greater supply of office space available (E(g)) amounting to 3,000sq.m. In immediate area around Totnes there is no availability of B2 and approx. 465sq.m of E (g). No evidence of development under construction or approved to change this supply

Consultations:

- County Highways Authority No objection
The Highway Authority has read the accompanying Transport Statement and has no objection to the proposals.

- Environmental Health Section No objection, subject to conditions
We have considered the noise report carried out by Mike Wood. He has looked at existing and potential future noise from each block separately and the possibility that process noise could affect the nearest residents at Coombe Park Farm which is about 100m away. He has concluded by calculation that an internal noise level not exceeding 84dB in the new building (block 2), and 73dB in the existing building (block 1) would ensure that noise is barely audible at that nearest residence. The measured background noise levels are low in this area (25dB daytime and 18dB at night) and therefore this calculation is very important. We therefore recommend that the following condition is included in any approval:

"Cumulative internal noise levels within the units comprising blocks 1 and 2 shall be controlled in order to ensure that the amenity of local residents is not unreasonably affected. The internal noise level shall not exceed 73dB in Block 1 and 84dB in Block 2, measured as 1 hour Leq, at any time. Reason: to protect the amenity of local residents.

- DCC Drainage No objection
Following an initial objection on insufficient sufficient information in relation to the disposal of surface water from the site the applicant provide further information. The information was considered acceptable and DCC have recommended conditions if permission was forthcoming.

- Town/Parish Council Support
The nature of the new business should be specified to avoid conflict with neighbours.

- SHWD Waste No objection
Waste Management Strategy for site is sufficient. Capacity for site will need to be considered but due to nature of proposed tenants it cannot be done at this time. The central refuse storage could be closer to the site entrance to reduce unnecessary vehicle movements on site. However, turning circle near block 2 would be sufficient for 26T collection vehicle.

- SHWD Trees No objection
 1. The submitted information has been principally reviewed in accordance with the Plymouth & South West Devon Joint Local Plan 2014-2034, BS5837:2012 Trees in relation to Design, Demolition & Construction & further additional industry best practise guidance, policies and legislation as required.
 2. Review of the submitted information has been undertaken and it is considered that accurate description of the site and level of constraint posed by the trees is made. The supporting tree protection methodologies have been prepared to most recent industry best practise and if

undertaken in their entirety will appropriately preserve and/ or enhance the constraining arboricultural features present

- SHWD Ecologist No objection
Concurs with conclusions of Ecology report that development would result in biodiversity gains. The level of biodiversity gain of course being dependant on implementation, and in that respect we would need a LEMP to be conditioned, and securing adherence to a LEMP secured via a s106. In terms of quantum then it is far exceeding the policy requirement so no concern there (30% instead of 10%).

Other than that conditioning of a lighting strategy reflecting recommendations and specifications of 5.3.3.3 as well as adherence to the various other mitigation measures as a general condition (which cover things like timing for vegetation removal).

- SHWD Strategic Planning Objection
The JLP will meet the identified need for B-use employment space through commitments and allocated sites. Figure 3.5 of the JLP shows how there is already existing supply tied up within extant consents and allocations to meet the requirements identified in policy SPT4. Until such time as the annual monitoring figures suggest that these permissions/sites are not coming forward, we should not be granting speculative windfall development.

Notwithstanding the broad support for expanding rural businesses in policy DEV15, this proposal would clearly be contrary to policy DEV15.8(ii), due to the fact that it is remote from nearby settlements and would require anyone working there to travel by private car. The spatial strategy of the JLP is to direct development towards the more sustainable settlements within the plan area. Within the local area are named settlement such as Totnes, Dartington and Harbertonford, all of which benefit from existing services and facilities and benefit from good levels of public transport. These are the type of locations that businesses should be seeking to utilise to ensure that they can support sustainable travel patterns and also benefit from enhanced connectivity for suppliers, distribution or buyers. The location of this proposal would lead to a conflict with policy SPT2.6, in that the site is not well served by public transport, or cycling or walking infrastructure.

The creation of the second unit would constitute development in the countryside, and I do not consider that the proposed uses would meet the policy provisions of TTV26.2(iv) in that they can be considered to require a countryside location. The existing uses in this location should not be misconstrued as providing justification for further development of this site.

Representations:

6 letters of objection on the following grounds:

- The commercial units will dominate the small hamlet
- The existing units are often not all let, so increasing the capacity by 50% may lead to more inappropriate uses on this site
- The maintenance of the site has deteriorated recently
- Increase traffic
- Local flooding
- Damage to adjoining stone walls from larger vehicle's accessing the site
- Poor access visibility
- Noise disturbance
- Overlooking from Block 2, and Block 1 because of becoming two-storeys
- Screening and natural environment
- Security
- Overshadowing

Relevant Planning History

- 3694/18/FUL. Erection of a ground mounted solar array. Jan 2019

- 1378/17/PRE. Pre application enquiry for proposed improvements and extension. Aug 17
- 0827/16/OPA. Outline application with some matters reserved for a new timber workshop unit with ancillary accommodation. Approved Aug 16
- 01/0722/02/RM. Replacement of workshop facilities. Approved Jun 02
- 01/1764/97/1. Outline application for replacement of poor quality workshops with new workshop facilities. Approved Dec 97

ANALYSIS

Principle of Development/Sustainability:

Policies SPT1 and SPT2 set the policy framework for supporting sustainable development. Policy SPT2 has a specific focus on reducing the need to travel, and promoting walking, cycling and public transport to support sustainable development and this is reinforced by para 103 of the National Planning Policy Framework. The Joint Local Plan (JLP) will meet the identified need for Use Class Order B-use/E(g) employment space through commitments and allocated sites in line with those objectives. Figure 3.5 (below) of the JLP shows how there is already existing supply tied up within extant consents and allocations to meet the requirements identified in policy SPT4, although it is noted that SPT4 established a minimum figure. SPT4 states within Thiving Towns and Villages policy area provision will be made for at least:

- 28,900sq.m B1a offices
- 21,700 sq.m B1/B2 Industrial
- 33,100 sq.m B8 Storage and distribution

	Plymouth Policy Area			Thriving Towns and Villages			Plan Area
	B1a office	B1/B2	B8	B1a office	B1/B2	B8	
Completions 2014-17	5,587	4,130	15,728	1,351	6,479	4,443	29,728
Outstanding Permissions Apr 2017	35,249	82,957	26,355	2,302	12,715	4,730	164,308
Allocated Sites	96,366	38,160	9,540	28,910	64,630	56,310	293,916
Total supply	137,473	116,987	51,623	32,563	83,824	65,482	487,953

Figure 3.5 Employment Land Supply, from the Joint Local Plan.

Policy DEV14 gives support for maintaining flexible mixed use employment sites by supporting investment and expansion of existing businesses as well as for the inward investment of high-value businesses. Paragraphs 83 and 84 of the NPPF give support for the ‘sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings’. Para 84 acknowledges that in rural areas sites may have to be found outside settlements and in locations not well served by public transport. Policy DEV15 gives further support to ‘appropriate and proportionate expansion of existing employment sites in order to enable retention and growth of local employers’. Nevertheless, part 8 (ii) of this policy states proposals should ‘avoid a significant increase in the number of trips requiring the private car and facilitate the use of sustainable transport, including walking and cycling, where appropriate.’

Policy TTV26 relates to development in the countryside and part 2 is relevant in the context of proposed Block 2 which is situated to the rear of the existing buildings on this site. Block 2 would be situated beyond the existing buildings, closest to the ownership boundary with surrounding fields, and therefore it is felt is closer in association to countryside than part of the established use. However, this section of land is not in agricultural use and currently used as additional parking for the business park and landscaped area around.

The Coombe Business Park is located approximately 2.5 miles outside of Totnes, which is defined as a key town under policy TTV1. The Business Park currently has 13 single-storey units and a further unit with a mezzanine level, with a gross floorspace of 1,250sq.m. The creation of first floor over Block 1 would create 498sq.m of additional floorspace and proposed Block 2 would create 816sq.m, which would over double the existing floorspace on site. The applicant states Coombe Park caters for a range of businesses who require small amounts of space, the largest occupies 170sq.m but most are under 100 sq.m. The businesses are varied but can be broadly categorised into art and artisan activity, emergent technology activity and computer/internet based activity. The applicant has provided evidence of a waiting list of 26 new tenants looking for between 25 – 140sq.m size units, and it is stated the existing and prospective tenants would not wish to commute to units within main towns.

The applicant states the specific businesses located at Coombe Park are drawn to its rural location as they do not want to be located within locations with high industrial presence, particularly of motor traders and noisy or heavily trafficked users. It is officer view that there is no land-use planning reason why creative industries need to be co-located, or why creative or tech industries cannot be located within a wider mixed-use employment area. The level of interest generated in the expansion is noted, and although an expression of interest is not the same as a commitment, it is evident that some businesses view the proposal favourably. It is also noted that about half of the applicants are from beyond what is considered to be the Totnes hinterland. No doubt the interest is stimulated by the prospect of working in a new building that is well-equipped and in a pleasant rural location – but there is a difference between employment need and the preference of an individual business owner. Of course most people would want to work in a tranquil rural location, but with no sustainable transport options available to provide alternative access to the site, decisions need to be made that reflect the intention of the JLP to transition to the a more sustainable future.

The applicant contends the development would not generate significant increase in private vehicle journeys as the majority of employees live in areas not served by public transport and so already use their vehicles to commute to work. Firstly, there is no means for the Local Planning Authority (LPA) to control where any of the occupants of the employment units come from. Secondly, by co-locating employment uses within or adjoining existing sustainable settlements the LPA can avoid additional and separate journeys to access the services and facilities that are found within these settlements. The fact that people will be working in Coombe Park will generate additional single-purpose journeys, whereas more journeys into existing centres will meet a much wider range of needs. The number of single-purpose journeys will be reduced if more workplaces exist within existing service centres.

The LPA agrees with the applicant that the JLP does not make provision for employment units at a small scale. That is because the JLP is a strategic plan that allocates provision of certain land uses to meet identified needs. This approach is consistent with the purpose of a strategic plan, and the spatial strategy that underpins it. If you look at table 5.1 (below) you will see that the JLP does not envisage, or rely upon, any employment floorspace being delivered below the top two tiers of the settlement hierarchy. That does not prevent smaller scale rural employment sites to come forward through neighbourhood plans, and is consistent with policy TTV25.

Settlement Type	New Homes 2014 - 2034	New Employment Space 2014 - 2034
Main Towns	4,417	103,070 sq m
Smaller Towns and Key Villages	911	46,780 sq m
Sustainable Villages	550	0
<p><i>Note: This table refers only to sites allocated by the Joint Local Plan policies plus the allowance for potential supply at Sustainable Villages - see paragraph 5.12. Completions 2014 to 2016 and commitments (permissions) as at March 2016 are additional to the allowance for the potential supply at Sustainable Villages.</i></p>		

Figure 5.1 Site Allocation totals by settlement from the Joint Local Plan.

In relation to the applicants analysis of the existing employment consent it is noted these all predate the adoption of the JLP. While permissions have been granted previously in rural locations, these reflect a previously adopted policy framework and many of the location sites of these permissions would also be considered unsuitable when assessed against the adopted spatial strategy of the JLP.

It is noted that while there is support for allowing the expansion of such employment sites, this sits under the overarching policy framework of only supporting sustainable development. Therefore, given the substantial increase in floorspace and the absence of public transport to this location, together with the fact the JLP has allocated enough land for employment the principle of expanding this site to such a degree is not supported in principle.

Design/Landscape:

In terms of design, the proposed extension to block 1 is considered acceptable as it would maintain the commercial appearance of the building within the rural landscape. Block 2 mirrors the design of block 1 with its butterfly roof formation and projecting first floor shared terrace. While Block 2 would be positioned on higher ground level and have a height of approx. 8.5m, it would be set well back within the site and so have limited visibility from the adjoining lane or surrounding landscape.

If permission were recommended then a landscape scheme would be conditioned in accordance with the outline scheme detailed within the ecology report. This scheme should also compensate for the trees that would need to be felled to enable this development.

Neighbour Amenity:

In terms of neighbour amenity, it is noted that the existing units have a close relationship to Coombe Park farmhouse located immediately to the south-west of the business park. In terms of the increase in massing of block 1, it is noted that is set 60m to the north of the rear elevation of the adjoining dwelling and so is not considered to result in loss of outlook or form an overbearing mass. There would be one window within the south-west elevation facing towards the dwelling, but given the separation this is not considered to result in significant overlooking and could be further mitigated by obscure glazing.

In terms of the impact on the adjoining dwelling of the proposed uses, the applicant has provided evidence that the existing uses have permission for B2 general industrial. Nevertheless, the new units are requested to be office, studio, workshop, as currently exist on the site, given the substantial increase in floorspace it is considered the intensification of the site may result in conflict due to the proximity of the adjoining residential neighbour. In response to this the applicant prepared a noise

assessment which has been reviewed by Environmental Health officers. The assessment concluded that if the internal noise level does not exceed 84dB in the new building (block 2), and 73dB in the existing building (block 1) this would ensure that noise is barely audible at Coombe Farmhouse. Due to the very low background noise levels in the area, it is recommended that noise levels are conditioned if permission were recommended. Subject to conditions, the proposal is considered in compliance with policy DEV1.

Highways/Access:

The applicant's Transport Statement (TS) has summarised that the development would generate one additional vehicle movement every six minutes (during AM/PM peak times). The Highways Authority have reviewed the TS and not raised any objections. The access, parking level and capacity on the local road network is therefore considered acceptable.

Nevertheless, policy DEV29 seeks to promote sustainable transport choices and facilitate sustainable growth by limiting parking at employment sites, providing convenient facilities for walking, cycling, public transport and zero emission vehicles. The rural location of the business park that has no provision of public transport and is distant from sustainable settlements is considered to result in an increase in private vehicle movements contrary to policy DEV29.

Drainage:

Devon County drainage engineers initially objected to the application on the absence of information, but following additional information submitted by the applicant this objection was removed and conditions recommended.

Ecology:

Policy DEV26 seeks to support the protection, conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area. Point 5 specifically states 'net gains in biodiversity will be sought from all major development proposals through the promotion, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations'.

Following officer comments the applicant commissioned a further Ecology report which identified that the development would result in approx 0.1 semi improved grassland, which is unmanaged and tussocky. In terms of mitigation, the scheme would require a lighting strategy to ensure there are no detrimental increases of light across the site that could impact bats. Vegetation and scrub removal should take place over winter to reduce impact on reptiles and works to the rear of Units 1-3 should be undertaken outside of the hibernation period (November – March). To protect nesting birds scrub removal should be outside of nesting (1st March to 31 August), unless it can be managed by a competent ecologist. Compensation for the loss of habitat will be partially addressed through the restoration of the grassland to species rich meadow and a pond created for wildlife. These measures will be included in the submitted landscape plan for the development. These measures will ensure that the development will result in a net gain of 2.67 biodiversity of units (30.65%),

Low Carbon:

Policy DEV32 looks to help half carbon emissions by 2034 and to increase the use and production of decentralised energy. This policy requires developments to identify opportunities to minimise the use of natural resources in the development over its lifetime, and be considered in relation to the energy hierarchy. In addition, major developments (such as this application) should take account of projected changes in temperature, rainfall, wind and sea level in its design with the aim of mitigating and remaining resilient to the effects of changing climate. All developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours. Finally and of reliance to this scheme, all major developments should incorporate low carbon

or renewable energy generation to achieve regulated carbon emissions levels of 20 per cent less than that required to comply with Building Regulations Part L.

In terms of reducing the energy load the applicant states the proposal includes insulation of the existing buildings and good insulation new buildings that would result in 25.4% savings. Air source heat pumps have been recommended as the most viable renewable technology which have been calculated to result in a 48% carbon reduction. It is disappointing that no solar PV is proposed to address the energy demands of the ASHP, however as the carbon reduction target it exceeded this cannot be required of the developer.

In terms of point 4 of policy DEV32, the applicant commissioned a daylight and sunlight report which illustrates the majority of block 2 and first floor of block 1 would achieve 27% vertical sky compliance. In terms of winter probable sunlight, it is noted all bar unit 4 (first floor of block 1) would achieve 10%.

Policy DEV15 8(i) requires a sustainable travel plan to demonstrate how the traffic impacts of the development have been considered and mitigated. It is again disappointing that a travel plan has not been submitted with the application, particularly given its rural location, however the applicant has committed to this being conditioned if permission were recommended.

While the report details the use of ASHP resulting in a much higher carbon reduction, the heat pumps were not shown the plans and as they would require permission in their own right they cannot be conditioned. If the applicant is minded to bring forward a scheme with heat pumps this would require a variation application to include these, which the LPA would like to see supported by Solar PV. Nevertheless, in terms of compliance with policy DEV32, subject to condition on the travel plan, the proposal would achieve a 25.4% carbon saving which exceeds the 20% required by policy.

Planning Balance

The proposed additional floorspace of this business park would result in unsustainable development by virtue of a resultant increase in private motor vehicle journeys, and without overriding justification to support the proposal in light of the current level of supply (consents and allocations) of employment land in the Plan Area. In addition, it is noted that while the scheme would achieve over 20% carbon savings, it does not include any low carbon or renewable technology that can be conditioned as part of this application.

This application has been considered in accordance with Section 38 of the Planning & Compulsory Purchase Act 2004 and, with Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Planning Policy

Relevant policy framework

Section 70 of the 1990 Town and Country Planning Act requires that regard be had to the development plan, any local finance and any other material considerations. Section 38(6) of the 2004 Planning and Compensation Act requires that applications are to be determined in accordance with the development plan unless material considerations indicate otherwise. For the purposes of decision making, as of March 26th 2019, the Plymouth & South West Devon Joint Local Plan 2014 - 2034 is now part of the development plan for Plymouth City Council, South Hams District Council and West Devon Borough Council (other than parts of South Hams and West Devon within Dartmoor National Park).

On 26 March 2019 of the Plymouth & South West Devon Joint Local Plan was adopted by all three of the component authorities. Following adoption, the three authorities jointly notified the Ministry of Housing, Communities and Local Government (MHCLG) of their choice to monitor at the whole plan level. This is for the purposes of the Housing Delivery Test (HDT) and the 5 Year Housing Land Supply assessment. A letter from MHCLG to the Authorities was received on 13 May 2019. This confirmed the Plymouth, South Hams and West Devon's revised joint Housing Delivery Test

Measurement as 163% and that the consequences are “None”. It confirmed that the revised HDT measurement will take effect upon receipt of the letter, as will any consequences that will apply as a result of the measurement. It also confirmed that that the letter supersedes the HDT measurements for each of the 3 local authority areas (Plymouth City, South Hams District and West Devon Borough) which Government published on 19 February 2019. On 13th February 2020 MHCLG published the HDT 2019 measurement. This confirmed the Plymouth, South Hams and West Devon’s joint HDT measurement as 139% and the consequences are “None”.

Therefore a 5% buffer is applied for the purposes of calculating a 5 year land supply at a whole plan level. When applying the 5% buffer, the combined authorities can demonstrate a 5-year land supply of 6.1 years at end March 2020 (the 2020 Monitoring Point). This is set out in the Plymouth, South Hams & West Devon Local Planning Authorities’ Housing Position Statement 2020 (published 22 December 2020).

The Plymouth & South West Devon Joint Local Plan was adopted by South Hams District Council on March 21st 2019 and West Devon Borough Council on March 26th 2019.

SPT1 Delivering sustainable development
SPT2 Sustainable linked neighbourhoods and sustainable rural communities
SPT4 Provision for employment floorspace
TTV1 Prioritising growth through a hierarchy of sustainable settlements
TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area
TTV26 Development in the Countryside
DEV1 Protecting health and amenity
DEV2 Air, water, soil, noise, land and light
DEV14 Maintaining a flexible mix of employment sites
DEV15 Supporting the rural economy
DEV23 Landscape character
DEV26 Protecting and enhancing biodiversity and geological conservation
DEV27 Green and play spaces
DEV28 Trees, woodlands and hedgerows
DEV29 Specific provisions relating to transport
DEV30 Meeting the community infrastructure needs of new homes
DEV31 Waste management
DEV32 Delivering low carbon development
DEV33 Renewable and low carbon energy (including heat)
DEV34 Community energy
DEV35 Managing flood risk and Water Quality Impacts
DEL1 Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy

Considerations under Human Rights Act 1998 and Equalities Act 2010

The provisions of the Human Rights Act 1998 and Equalities Act 2010 have been taken into account in reaching the recommendation contained in this report.