

PLANNING COMMITTEE

28th August 2024

SUMMARY OF ADDITIONAL CORRESPONDENCE RECEIVED SINCE THE PUBLICATION OF THE AGENDA AND ERRATA

Item No. 9/1(a) 13/01615/OM

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Agent: The Agent has submitted the Supporting Statement set out in full below:

“Statement in Support of the Planning Application

The outline planning application was submitted in October 2013 and has been subject to extensive consultation. Hopkins Homes has worked collaboratively with the Council and stakeholders in responding to the issues raised, and subsequent policy changes. This has led to revisions to the design since submission and ensures a robust and appropriate development proposal is now being considered. The changes to the scheme can be summarised as follows:

- Internal road infrastructure enhanced to future proof ability to dual A47 (required as part of the wider growth area) and allowance for design flexibility (now that NCC will deliver the WWHAR).*
- Green buffer around the site boundary enhanced to provide connected green links around the site and pedestrian/cycle amenity space.*
- Relocation of school and ‘local centre’ to centre of development to create a community heart in a central and accessible location and to allow earlier delivery of the school.*
- Straightening of Spine Road to improve wayfinding/bus navigating.*
- School site increased to 2 hectares (as required by NCC).*
- Allowance for flexibility on design of the WWHAR.*
- Phasing to begin from A10 (rather than A47) to ensure first residents are located closer to existing services and facilities.*

The proposals are submitted in outline only, which means the detailed design will need to be submitted later for approval by the Council. The Council therefore retains control over how the scheme is delivered and specifically designed going forward.

However, to ensure the detailed design proposals will be of high quality, the outline application incorporates parameters, which will shape the subsequent detail – these parameters relate to landscaping and green infrastructure, access (connections around the site and onto the surrounding network), height of buildings, density of buildings, and land use (to ensure a mix of uses).

The application proposals have been informed by planning policy, in particularly the statutory development plan policy (Policy E2.1 ‘West Winch Growth Area Strategic Policy’ and the North Runcton and West Winch Neighbourhood Plan), which are the primary policy considerations. The emerging policies within the Local Plan review (2036) and the National Planning Policy Framework reinforce the appropriateness of the primary policies.

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For the purposes of clarity, we set out below how the proposals support and accord with the primary policy - Policy E2.1.

- 1. The application proposes up to 1,110 homes, a significant contribution to the SADMPP requirement of 1,600 homes in the wider growth area by 2026, and a new primary school, community facilities, open space and a retail facility.*
- 2. The application proposals form an integral part of the wider West Winch Growth Area Framework Masterplan SPD that allows for development beyond the SADMPP plan period. It presents one of the three distinct neighbourhoods proposed to the east of the A10.*
- 3. Although only an outline application, the proposals present the opportunity for a broad range of dwelling types to provide choice and meet different needs. The Council will retain control at the detailed Reserved Matters stage to decide whether the type and tenure of housing proposed is acceptable. Given the significant cost of delivering new infrastructure, the scheme can realistically only afford to provide 10% of housing as affordable. This is agreed with the Council (and its external advisors).*
- 4. The application proposals contribute c£3.5M to the WWHAR, which is being delivered by NCC as well as provide a Spine Road through the development to connect the A10 and A47.*
- 5. Following discussions with the bus operator, the Spine Road through the proposed site was straightened to accommodate bus services. A network of cycle routes is proposed through the site (as indicated on the access parameter plan) and will connect into the wider cycle route network at Hardwick Junction and along the WWHAR, promoting active travel.*
- 6. c£165,000 of contributions to improve pedestrian/cycle links off-site is also proposed, including a dual use path connection to Middleton.*
- 7. A local centre is proposed in the centre of the application proposals adjacent the proposed new primary school. It is located at a point where pedestrian and cycle routes intersect with the main Spine Road. It is within walkable distance of all the proposed housing.*
- 8. The application proposals incorporate green areas around its boundaries including to the south which aligns with one of the gas pipelines. The boundary areas include a range of uses, including ecological areas to the north, landscaping and additional woodland planting to the east, sport and recreation areas to the south and landscaping to the west. There are proposed pedestrian/cycle routes around the perimeter of the Site.*
- 9. Nearly 20 hectares (38% of the site area) is proposed for landscaping, open space, drainage features or sport and recreation. Nearly 10 hectares of this constitutes informal open space (compared to an open space standard requirement of c6 hectares). In addition, the application proposals will contribute financially to measures that mitigate impacts on designated sites, via the Habitat Mitigation Payment initiative (GIRAMS). (Natural England and Norfolk Wildlife Trust do not object to the proposals).*
- 10. The application proposals include sustainable drainage features such as attenuation basins where surface water can be stored before being discharged into the off-site drainage network at existing greenfield rates. The basins have been designed to store 1 in 100 year flood events plus an additional 40% of capacity, to take account of climate change. In total almost 15,000 cubic metres of surface water storage capacity is provided on site, which will provide a betterment to the existing situation.*

11. Once surface water is collected, the basins serving the eastern and northern areas of the site will discharge back to the Pierpoint Drain. The basins serving the central and western catchment areas will discharge via a pump to an Anglian Water connection point at the Hardwick Narrows Industrial Estate. The LLFA, Anglian Water and the IDBs do not object to the proposed drainage strategy. However, the LLFA are keen to explore a solution whereby the central and western basins can discharge via a gravity outflow to the Puny drain. There are 3 options being explored as part of the detailed design, and initial feasibility studies suggest there is a strong possibility that a gravity outflow solution (back to the Puny drain) can be achieved. Planning Conditions will be imposed on any permission to ensure these options are fully tested with the IDB and LLFA prior to Reserved Matters being submitted. If for whatever reason, they are not achievable, the proposals will revert back to the agreed pumped pipeline solution to the Anglian Water connection point.

12. The application proposals accord with the requirements of the Infrastructure Delivery Plan in contributing to growth area wide requirements. In total around c£24m of infrastructure will be delivered, which is an equitable proportion of the overall Infrastructure Delivery Plan requirement. (A comparison of contributions compared to IDP requirements is provided in the Committee Report.

13. The Framework Masterplan work, together with the King's Lynn Transport Model provides a strategic transportation plan for the area. A Transport Assessment accompanying the application proposals also considers the traffic impacts of the scheme and has been updated throughout the application process. This work is consistent with, and reaches the same conclusions as, the NCC work supporting the Local Plan review and the WWHAR application. As part of that, it concludes that up to 300 homes can be accommodated direct from the A10 prior to the delivery of the access onto the A47 (provided some widening of approach flares to the Hardwick Interchange is delivered).

14. The application proposals have been informed by ecological assessments, which were recently updated in late 2021. The ecological work identifies the likely impact of the development and proposes mitigation and enhancement measures, which will be secured by planning condition. This includes:

- Translocating grassland habitat features from the south to the north of the Site, and creating new flower-rich grassland (including 5.8 hectares of land to be used as a great crested newt translocation area),
- Enhancing and improving the management of retained woodland, and providing c3.6 hectares of land for additional woodland planting adjacent to the Sheep Course wood;
- Planting native species-rich hedgerows, scrub and trees;
- Designing new attenuation basins to meet the habitat requirements of great crested newt in particular and wildlife more generally;
- Retaining, creating and managing flower-rich grassland, scrub-fringe habitat and deadwood resources for the site's invertebrate assemblage;
- Creating habitat piles, hibernacula, nest boxes and roost boxes;
- Provision of dedicated access routes through retained/created habitat for future residents, alongside interpretation signage and household information packs;
- Installation of road underpasses and warning reflectors for badger.

15. *A Ground Assessment has been undertaken and there is not a viable reserve of silica sand on the site. Accordingly, NCC 'Minerals Department' have no objections to the proposals.*

In addition, the application proposals will achieve high standards of sustainability and energy efficiency.

Hopkins Homes have a Fabric First approach to house building, meaning energy efficiency is weaved into the fabric of each property, rather than added as an afterthought

Energy efficient features and products and materials are carefully selected for their provenance, working with local suppliers and trades where possible.

The homes will be heated with efficient air-source heat pumps (ASHP) instead of conventional gas boilers, and waste-water heat recovery, to reduce carbon emissions. These measures meet requirements for energy saving, which saves money in energy bills for future occupiers, whilst remaining practical and of high quality. It is anticipated that the proposed homes will meet a 75% reduction in CO2 emissions compared to the requirements under the 2013 building regulations.

Accordingly, the application proposals conform with the required policy tests and the grant of planning permission should be approved."

In addition, the following comments have been made regarding conditions (summarised):

- Conditions 8, 11, and 12 - should be changed to 'Prior to approval of the first Reserved Matters application for residential development.....' It is unlikely that the level of detail required by these conditions, particularly for the site wide landscape strategy, could be provided on a credible basis without undertaking the detailed design process of the RM alongside. For this reason, the work is likely to be undertaken in parallel and the conditions should allow this to happen as it would ensure more timely delivery.
- Condition 17 - This condition assumes that each RM phase will comprise a self contained part of the development. There may however be instances where the RM phases are adjoined, or a continuation of a wider character area. This condition should include 'unless otherwise agreed' to provide some flexibility and avoid this situation.
- Condition 22 - The signalised pedestrian/cycling crossing is understood to be a component of the traffic calming and environmental improvement work that forms part of the £268,000 contribution. If this work is being conditioned and delivered by Hopkins Homes, it will be important to ensure this is also reflected in the S106.
- Condition 24 - This condition is only required in the unlikely event that the WWHAR has not been completed prior to the occupation of 150 homes. It should include a proviso that this condition is only relevant in that scenario.
- Condition 26 and 27 - The Interim Travel Plan in Condition 26 is for construction traffic so will be picked up by Condition 28 requiring a CEMP. Condition 27 seeks a Full Travel Plan but this is already funded through the sustainable transport contribution as noted in LHA response. Conditions 26 and 27 can be deleted.

West Winch Parish Council: Considers that the decision on Hopkins 13/01615/OM should be made after the consultation [on the Main Modifications consultation] has ended and when funding has been received from Government for the Bypass. It would seem that the Council is trying to push

this through without proper allowance for representation from West Winch Parish Council or the residents of West Winch and the surrounding areas affected.

NCC Highways (LHA): The Local Highway Authority agrees that because the applicant is making a Sustainable Transport Contribution which will cover the Travel Plan and which in turn means that NCC will be delivering it, there is no requirement for conditions relating to the Travel Plan.

Third Party: 12 Letters of OBJECTION regarding:

- West Winch gets two crossings, Setchey has none.
- Zero regard has been paid to neighbouring villages.
- Existing infrastructure such as health facilities (GPs, Dentists, Hospital) cannot cope with the in the area and surrounding areas.
- Road network cannot cope and a dual carriageway is needed from Downham Market to King's Lynn.
- The Hardwick Roundabout is persistently backed up with traffic.
- The plan is now outdated.
- No new homes should be built until a new road/roads are in place and accidents/incidents have occurred in the last few days on both the A10 and A47.
- James Wild asked about the release of funds for the road and it appears that the funding is not forthcoming and therefore it should be secured via S106.
- Road network cannot sustain another 1100 homes and the application should be declined until all funding is available.
- The plan was prepared long ago and should be reviewed to see if there are more suitable areas for additional development.
- The development will destroy West Winch and North Runcton.
- Impact on wildlife.
- Already surface water drainage issues which impact on the sewage network.
- Roundabouts create traffic to back up for existing residents, business and holiday makers. Considers the relief road with 5 roundabouts will not alleviate traffic issues.
- Considers money should be invested in the King's Lynn by-pass instead.
- Considers development would impact on Rectory Lane (traffic) and the Common (wildlife)
- Objects to noise and disturbance from extra traffic.
- Don't have a housing problem in the UK but a distribution problem. The Coast is full of holiday homes, there are brownfield sites and derelict buildings that are land banked and we should be using these for homes rather than agricultural land.
- Difficult to exit Lemuel Burt Way in a morning and with the upcoming Beet campaign it is dangerous and therefore objects until there is a reduction in traffic.
- Considers a further 4000 houses will not relieve any major congestion on the A10 and adding an addition will not help either. Need more roads or less housing.
- A bypass for Setchey is also required given volumes of traffic and accidents on a major route
- Essential that active travel links are constructed and upgraded prior to work starting.
- Current walking and cycling route around Hardwick is substandard and in poor condition. Links along and across Hardwick Road are discontinuous and difficult to use.
- Needs to be a more direct link to the QE hospital.

Cllr Kemp: Four emails covering the following points (summarised):

- Queries whether the parameter plans constrain reserved matters.
- Considers that it is unwise for the Committee to approve the application before the West Winch Bypass is in place, the Government confirms its share of the funding, and consultation has taken place on the Local Plan Main Modifications.

- Considers that allowing 300 houses to access the A10 without highway intervention places the developers interests above the public interest as if building occurs and the bypass does not come forward, conditions on the A10 will deteriorate. Considers this also occurred in 1990 when plans were drawn up for a bypass but the Govt did not deliver the funding.
- The new Government is reviewing road building and there is no guarantee that this road will be built.
- Considers that without the bypass, the sustainable transport plan cannot be implemented. The development would be heavily car dependant.
- The A10 is high-accident sub-standard route with 20,000 vehicles per day including 11% HGVs. It has poor sight lines, bends and narrow points.
- Public should have their say first.
- Disputes the developers claim that the A10 can take 300 houses on an exit opposite The Winch public house.
- Considers holiday traffic as well as the Beet Campaign should be taken into account when assessing capacity and that there is insufficient capacity on the A10 to cater for 300 dwellings.
- Residents at Lemuel Burt Way and East View have difficulty accessing the A10.
- A traffic light crossing is essential.
- Considers that even with a roundabout opposite The Winch, access would be treacherous.
- Considers that the surface water drainage is an issue and that new development will increase surface water off-site. Refers to all options for surface water given by the applicant and considers that there are issues with all of them as existing residents have experienced surface water flooding.
- Considers Conditions 22 and 24 and the requirements within are not the bypass and therefore will not alleviate problems on the A10.
- Considers that 10% affordable housing is unacceptable and that 20% should be provided in accordance with the Council's policy.
- Considers that the cost of the West Winch Bypass has increased from £84m to £109m and that Government has put major road projects on hold and therefore the road may not be built.
- Considers that Norwich Distributor Road was put in place first and this should happen in West Norfolk.
- References the Outline Business Case and commentary on the poor performing A10 in terms of impact on the economy, safety and air quality.
- Considers that the school should be built after the first 100 homes as stated within the IDP and should be conditioned to that effect. States that the closure of Middleton Primary School puts further pressure on local schools.
- States that Hopkins will start building at the end of 2025 but that that Bypass will be built in 2026-2027 and that infrastructure should be in place first.
- Considers that the sustainable transport contribution of £500 per dwelling is not enough.

Cllr Ryves: Queries why this is a change of use when it is an allocation.

Assistant Director's comments:

The applicant's supporting case is noted. Suggested amendments to conditions 8, 11 and 12 are logical and can be accommodated as long as the documents are agreed prior to the approval of the first reserved matters. This allows for site wide strategies to be determined early on in the development process. The flexibility point regarding the completion of the roads per phase is noted and therefore the addition of the words "unless otherwise agreed" would still mean that the condition meets the six tests. Condition 22 relates to the signalised pedestrian/cyclist crossing and Table 1 references that. In Heads of Terms, there is the acknowledgement that the crossing can be

delivered by condition. Whilst the point regarding the provision of the WWHAR is noted, other parts of the condition refer to the estate road linking the A10 roundabout to the A47 roundabout and therefore the condition remains necessary. In the event that the WWHAR is constructed and operational in full prior to the occupation of the 150th dwelling, the submission of detailed drawings for the WWHAR Phase 1 would no longer be required. Conditions 26 and 27 may be deleted as confirmed by the Local Highway Authority response above.

The main body of the report is comprehensive and covers points raised by the Parish Council and third parties and Members in Late Representations. With regard to the provision of the primary school, there is no requirement within the IDP to have a fully built out school by 100th dwelling. The IDP is a high level document with assumed trigger points that are confirmed by statutory consultees via individual planning applications as set down in the report. The County Council has already agreed 2ha of land for the school would need to be provided by occupation of 300 dwellings along with £8m worth of contributions (index linked), the trigger points for which would be set down within the Site Specification S106. The County Council would be consulted as part of this process.

Amended conditions and corrections: The following amended conditions are suggested to take account of comments raised by the Agent, to firm up conditions and to correct minor typographical errors. Further Condition 2 has been amended to delete the words “consisting of at least 300 dwellings” as this, on reflection, is unnecessary given that the first phase includes significant infrastructure (roundabout/pedestrian crossing) and the submission of applications for lesser numbers speeds up the delivery process.

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- 2 Condition An application for submission of Reserved Matters (Reserved Matters being Access, Appearance, Landscaping, Layout and Scale) for the first phase of residential development, hereby permitted shall be submitted to the Local Planning Authority prior to the expiration of 3 years from the date of this permission and the development shall be carried out as approved.
- 2 Reason To ensure the timely and comprehensive delivery of the development and to comply with the provisions of section 92 of the Town and Country Planning Act (1990) as amended. An extended timeframe for submission is acceptable, given the scale of the development.

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- 5 Condition Subject to compliance with the requirements of any other condition included within this planning permission, the development hereby permitted shall be carried out in general conformity with the following approved plans, but only in respect of those matters not reserved for future consideration: -
 - Site Location Plan TA01 (Received 13.11.13)
 - Parameter Plan – Access HOPK170405 PP AP-01 Revision B (Received 2.10.18)
 - Parameter Plan – Density HOPK170405 PP DP-01 Revision B (Received 2.10.18)
 - Parameter Plan – Height HOPK170405 PP HP-01 Revision B (Received 2.10.18)
 - Parameter Plan – Land Use HOPK170405 PP **LUP**-01 Revision B (Received 2.10.18)
 - Parameter Plan – Landscape HOPK170405 PP **LP**-01 Revision B (Received 2.10.18)
- 5 Reason To ensure that the development is carried out in accordance with the Environmental Statement.

Amend heading to **Prior to submission/approval of Reserved matters**

7 **Condition** Notwithstanding details shown on **Parameter Plan – Phasing Revision E received 27.11.21**, prior to the approval of the first Reserved Matters application, **an updated programme of phasing across the entire development hereby approved and based on the proposed sequence identified on Phasing Plan Revision E** shall be submitted to and approved in writing by the Local Planning Authority (herein referred to as the 'Phasing Strategy'). The Phasing Strategy shall include:

- I. A plan defining the extent of the area of each Phase;
- II. The order and timing of the proposed Phases;
- III. Details of the number and mix of residential units to be accommodated within each Phase (or part thereof)
- IV. The phasing of access and connections through and into the site;
- V. The details of the order and timing of strategic infrastructure consisting of public realm, infrastructure works, highway works and pedestrian and cycle works; and
- VI. Details of the quantum and type of green infrastructure, strategic open space, play, and outdoor sports facilities to be provided in each Phase and a timetable for its provision for use by the public.

Development will be carried out in accordance with the approved Phasing Strategy unless otherwise agreed in writing by the Local Planning Authority.

7 **Reason** To ensure that the development is comprehensively designed and phased, in accordance with Policy E2.1 of the SADMPP, the SEKLSGA Infrastructure Delivery Plan 2018, the North Runcton & West Winch Neighborhood Plan 2017 and the West Winch Growth Area Framework Master Plan SPD.

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8 **Condition** Prior to the **approval** of the first Reserved Matters application an Overarching Design Code, covering the entire development site which is broadly consistent with the submitted Design and Access Statement (Received 30.6.2016 and updated September 2021 received 17.12.21) shall be submitted to and approved in writing by the Local Planning Authority. The Overarching Design Code shall address the following matters: -

- a) Character areas and design principles;
- b) Green framework including drainage;
- c) Movement hierarchy including streets, footways and parking typologies;
- d) Built form and place making features;
- e) Non-residential uses - Primary School, and Local Centre;

8 **Reason** To inform the more detailed Phase Design Codes and ensure a high quality and co-ordinated design for the development, in accordance with the Policy E2.1 of the SADMPP, Policies GA01-10 of the North Runcton & West Winch Neighborhood Plan 2017 and the West Winch Growth Area Framework Master Plan SPD.

11 **Condition** Prior to the **approval** of the first Reserved Matters application a Site Wide Ecology Strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall set out how the ecological mitigation identified within the submitted Environmental Statement (see Table 6.2 of the Ecological Impact Assessment contained in Appendix 3 of the submitted Environmental Statement Addendum 2 received 17.12.21 and supplementary information submitted by Urban Edge Consulting Ref UE0404 dated 27th May 2002)) as being necessary to address how both the temporary and permanent effects of the

development will be incorporated into the construction phases and the reserved matters areas forming the final development, together with details of the timing for implementation, and a scheme setting out the measures which will be implemented to enhance the biodiversity of the site.

Each subsequent Reserved Matters application shall demonstrate how the development accords with the approved Site Wide Ecology Strategy through the submission of a phase specific LEMP, CEMP and EDS (or agreed equivalent) and the agreed details shall thereafter be implemented in full within the development carried out and thereafter retained as such.

- 11 Reason To ensure the development contributes to and enhances the natural and local environment by minimising impacts on biodiversity; conserving protected and priority species and habitats and providing net gains in biodiversity in accordance with the NPPF, Policy CS12 of the CS and Policy E2.1 of the SADMPP.
- 12 Condition Prior to the **approval** of the first Reserved Matters application, a Site Wide Landscape Strategy shall have be submitted to and agreed in writing by the Local Planning Authority. The site wide Landscape Strategy shall be prepared in accordance with the Landscape Parameter Plan Revision B shall include:
 - 1 a landscape management plan for the long-term landscape objective;
 - 2 management responsibilities and schedules for all of the public realm hard and soft landscaped areas for a minimum of 25 years;
 - 3 the planting and establishment of structural landscaping to be provided in advance to all or specified parts of the site as appropriate in line with the phasing plan approved under Condition 7,
 - 4 the detailed landscape treatment of roads and streets within the development, with a full and detailed specification of the establishment of trees within hard and soft landscaped areas, including details of space standards and underground planting pit/trench details;
 - 5 details of public realm materials, signage, utilities, and any other street furniture including litter bins, locations of traffic signage, streetlights and associated works to show that they will not prejudice the siting and successful establishment and growth to maturity of the proposed new boulevard open space and street trees to be planted.
- 12 Reason To ensure that the development contributes to and enhances the natural and local environment in accordance with Policies CS08 and CS12 of the Core Strategy, Policy DM15 and E.21 of the SADMPP, Policies WA05, WA07, GA02 and GA05 of the North Runcton & West Winch Neighborhood Plan 2017 and the West Winch Growth Area Framework Master Plan SPD
- 17 Condition Prior to the occupation of the penultimate dwelling of each phase of development (as agreed under Condition 7) all works shall be carried out on roads/footways/cycleways/street lighting/foul and surface water sewers in accordance with the approved specification to the satisfaction of the Local Planning Authority **unless otherwise agreed in writing.**
- 17 Reason To ensure satisfactory development of the site and to ensure estate roads are constructed to a standard suitable for adoption as public highway in accordance with the NPPF, Policies CS11 of the CS and Policy DM15 the SADMPP

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24 Condition Prior to the occupation of the 150th dwelling within Phase A of the development hereby approved detailed drawings for the estate (feeder) road, roundabout to the south of the A47(T) and the link road to the A47(T) and associated roundabout (WWHAR Phase 1) as identified on Access Parameter Plan HOPK170405 PP AP-01 Revision B (Received 2.10.18) shall be submitted to and approved in writing by the Local Planning Authority. **In the event that the WWHAR is constructed and operational in full prior to the occupation of the 150th dwelling, the submission of detailed drawings for the WWHAR Phase 1 would no longer be required.**

24 Reason: To ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and to protect the environment of the local highway corridor in accordance with the NPPF, Policies CS11 of the CS and Policy DM15 the SADMPP.

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Delete Conditions 26 and 27

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35. Condition In the event that contamination is found in any phase and at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition **32**, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition **33**, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition **34**.

35 Reason To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the NPPF and Policy DM15 of the SADMPP.

Following changes and deletion of Conditions 26 and 27, renumber conditions 1-35 (inc)