

Planning Statement

The Bungalow, Albert Street North Thornley, Durham

February 2022





Confirmation of Instruction			
Client	Moncur Group		
Site	The Bungalow, Albert Street North, Thornley, Durham		
Prepared By	Daniel Puttick BA(Hons) Senior Planner		
Reviewed By	Mark Ketley BA(Hons) DipTP MRTPI, Planning Director		
Our Ref	BHPD00400		
Confirmation and Standards	We confirm the document has been undertaken in accordance with the RTPI's requirement for planning professionals to meet and maintain high standards of competence as set out in its Ethics and Professional Standards practice advice, updated in 2017.		

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1. Introduction

- 1.1 This Planning Statement has been prepared in support of a planning application which seeks the change of use of an existing property known as The Bungalow at Albert Street North in Thornley from its current use as a residential dwelling (Use Class C3) to a children's care home for up to four children.
- 1.2 The document explains the context of the development proposal whilst also presenting an overarching justification for the scheme in the context of all relevant national and local planning policy and guidance. It has been prepared on behalf of our client, the Moncur Group, who own the property and successfully manage other premises across the North East providing much needed care for vulnerable children in needing of housing.
- 1.3 To assist Durham County Council in its consideration of the application, this Planning Statement accompanies the submission of a full suite of existing and proposed plans including:
 - Site Location Plan
 - Existing Site Plan
 - Proposed Site Plan
 - Existing Floor Plan
 - Proposed Floor Plan
 - Locality Risk Assessment
 - Safeguarding Children Policy
 - Missing Persons Policy
 - Content List of other Core Policies within Moncur Group



2. Site Description

- 2.1 The application site comprises of The Bungalow which is situated on Albert Street North in the settlement of Thornley near Durham. The property is detached, set on a modest plot at the northern end of a short row of properties along the street. Access is taken from the east from street level with parking to the north of the property in the form of a double garage and double driveway. Garden areas are located to the west and south with the property surrounded by open grassed land to the north, east and west which is understood to have been developed prior to rows of terraces being demolished.
- 2.2 The dwelling currently comprises of four bedrooms, two of which are located on the first floor with a family bathroom. The ground floor comprises of two double bedrooms with a further single bedroom/study, kitchen, bathroom and living area. Entrance to the property is taken from the west elevation with access to the rear and side gardens available from the kitchen. The garage can be accessed from the driveway as well as via a side door from the rear yard.
- 2.3 The property is located in the built up area of Thornley, a short distance east of Thornley Village Centre and within walking distance of the various shops and facilities within the settlement as well as the village primary school. Given its location the property is also well located to the settlement of Wheatley Hill with primary schools in both villages feeding into Wellfield Community School at nearby Wingate.



3. Planning History

3.1 The following is a summary of the planning history for the site:

Reference Number: 5/HIST/2004/1025

Description: Extension to roof to provide additional bedrooms

Status: Approved



4. Description of the Proposals

- 4.1 Full planning permission is being sought in this case for a material change in the use of the property from a dwellinghouse (Use Class C3) to use as a children's home (Use Class C2) for up to four children aged between 11 and 17 years old.
- 4.2 The proposals seek to change the use of the property to provide much needed accommodation for the care of vulnerable young people creating a safe haven and home environment for children who for various reasons find themselves in need of care. The Bungalow is intended to provide long term therapeutic care for young people and as a result would not accept emergency referrals or placements. Admissions would be carefully matched, planned and managed to avoid added trauma or disruption to young people that it is intended to house.
- 4.3 The Moncur Group intend to provide care for up to three children in the home as this would allow for the effective matching of children within the home. However, planning permission is sought for the use of the home for up to four children, primarily to allow for the possibility of placing sibling groups in care together in line with properties within their existing portfolio, including The Gables at Seghill and Cedar Grove at Wallsend.
- 4.4 A small number of changes are required to facilitate the proposed change of use of the property, most of which would be internal. The proposals would see the removal of a door within the entrance vestibule and subdivision of the larger bedroom at ground floor level to a single bedroom and games room with a new window to be installed on the north elevation of the property and stud partition wall making this possible. The study to the rear would be utilised as an office for staff with sleeping accommodation for overnight stays provided. At first floor level it is proposed to subdivide one of the bedrooms to enclose an existing boiler creating a storage area or quiet room. The existing garden areas would be maintained with the garage to be made available for the storage of vehicles, bicycles and refuse containers with additional parking available on the driveway and on-street.
- 4.5 The premises would be strictly regulated by Ofsted, however for the purposes of this planning application it is the intention of the Moncur Group to operate with two members of staff in the premises at any one time with additional oversight by management provided across the Group's portfolio of properties. The children and their carers would co-habit within a family-orientated environment and would eat together, socialise together and share responsibilities for the upkeep and management of the property such as gardening, cooking and cleaning. As such, there is no requirement for any additional workers to attend the property except to undertake specialist works or to carry out routine meetings with the resident children.
- 4.6 The care environment would be tailored to ensure minimum disruption to local residents with movements to and from the home being very similar to that of a family home with parents coming and going to work, taking children to school and to extra-curricular activities or to shops. The intention is that children would be provided with a normal grounding with daily life and routines being kept similar to that of a normal family. As such, vehicular movements to and from the property are unlikely to be any different to those generated by any ordinary family of this size and indeed no greater than the number of trips generated by past occupants of the property.
- 4.7 Working patterns would be on a shift basis and are currently arranged on the basis of staff availability within the existing portfolio of the company. As noted in correspondence provided by Moncur Group, not all staff are drivers and, as such, car sharing occurs on a regular basis across their existing sites. This arrangement is expected to continue and would see shifts shared over the course of a 24 hour period



- with a shift commencing at 10am and finishing at 10am the following day. Two staff would be on-site to cover the 24-hour period with a shift involving daytime care and an overnight stay within the property.
- 4.8 The handover period is expected to take place at 10am to avoid busier times such as, for example, school runs. Handovers would take no more than ten minutes and would involve the previous shift providing an update on the care home and any clerical administration. Departing shifts would then leave the property with the entering shift taking occupation. The maximum number of staff on-site at any one time would therefore be four, however this would be for a twenty-minute period whilst a handover takes place. Outside of this period, the maximum number of staff on-site would be two.
- 4.9 Current working arrangements are such that the maximum number of vehicles on-site at any one time would be three. This is due to the fact that not all staff own or have access to a vehicle or hold a driving license. Moncur Group Ltd as an employer actively encourage the use of sustainable modes of transport to minimise journeys to and from properties in an effort to reduce impacts on the amenity of neighbouring residents and encourage the use of alternative transport methods.
- 4.10 From a safety point of view, the use of alarms and locks on bedroom doors has been discounted for the building. However, where a young person's requirements and care plan dictate that additional security measures are required, appropriate systems would be installed. Window restrictors would be used across all windows in the property with staff being responsible for keys and locks to external entrances and exits from the building.



5. Legislative & Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the "development plan" unless material considerations indicate otherwise. Such material considerations can include Government policy statements, including the National Planning Policy Framework (NPPF) of which a revised version was published by the Government in July 2021.

Local Planning Policy

- 5.2 The application site lies within the administrative boundary of Durham County Council whose development plan comprises of the county-wide County Durham Plan adopted in 2020. By law, relevant policies within the development plan provide the starting point for determining planning applications in the area and form the basis against which these proposals should be assessed.
- 5.3 Policy 1 of the County Durham Plan (CDP) provides aspirations for growth across the County indicating that, to meet the needs and aspirations of the present and future residents of County Durham and to deliver a thriving economy, a minimum of 24,852 new homes of mixed type, size and tenure will be expected to be delivered over the period 2016 to 2035.
- 5.4 Policy 18 relates specifically to the provision of children's homes and it states that in order to promote the creation of sustainable, inclusive and mixed communities, applications for children's homes will only be permitted where:
 - a) The applicant is able to demonstrate that the development will address any gaps in service provision to the satisfaction of the Local Planning Authority;
 - Sites offer a positive and safe environment for the occupants of the premises ensuring that there
 is appropriate access to local services and facilities;
 - The size/scale of the children's home will allow the occupants to be appropriately matched with regard for each child's welfare and taking into account their individual circumstances;
 - d) The occupants would not be placed at risk having regard to the latest crime and safety statistics in the area and that this has been agreed in advance with Durham Constabulary, the Council's Children and Young People's Services and other appropriate agencies;
 - e) It is unlikely to cause unacceptable individual or cumulative impact on residential amenity, fear of crime or community cohesion;
 - f) Appropriate measures will be in place to ensure access for emergency vehicles and safety measures such as fire escapes; and
 - g) Satisfactory outside space, highway access, parking and servicing can be achieved.
- 5.5 The policy goes on to state that in all instances a planning application must be supported by information regarding the management of the residential home together with an assessment to ensure that necessary safeguards are put in place to ensure the welfare of the children. This will include consideration of any crime or safety concerns in the area in consultation with Durham Constabulary, Children and Young People's Services and any other appropriate agencies.
- 5.6 Policy 21 provides principles for the delivery of sustainable transport measures. It seeks to ensure that transport implications of development are addressed as part of any planning application and that proposals deliver, accommodate and facilitate investment in safe sustainable modes of transport in order of hierarchy which gives priority to those with mobility issues or disabilities and those walking and cycling. The policy also seeks to ensure that any vehicular traffic generated by the new development



- can be safely accommodated on the local and strategic highway network, and does not cause an unacceptable impact in terms of congestion or air pollution.
- 5.7 Policy 21 of the CDP also sets out a number of principles which are used to determine cycle and parking provision in development with an expectation that cycle parking or secure storage should be provided on site. Car parking at residential developments is expected to ensure that a sufficient level is provided for both occupants and visitors, to minimise potential harm to amenity from footway parking. It sets out that proposals should have regard to the Parking and Accessibility Supplementary Planning Document which does not provide specific parking requirements for proposals involving residential care homes or children's homes.
- 5.8 Policy 29 establishes a range of sustainable design principles and expects all development proposals to achieve well designed buildings and places having regard to the Council's supplementary planning document and sets out elements for development to be considered acceptable.
- 5.9 Policy 31 indicates that development will be permitted where it can be demonstrated that there will be no unacceptable impact, either individually or cumulatively, on health, living or working conditions or the natural environment and that can be integrated effectively with any existing business and community facilities. Development will not be permitted where inappropriate odours, noise, vibration and other sources of pollution cannot be suitably mitigated against, as well as where light pollution is not suitably minimised. It states that permission will not be granted for proposals which would result in the location of sensitive land uses near to potentially polluting development. Similarly, potentially polluting development will not be permitted near sensitive uses under the policy unless the effects can be appropriately mitigated.

National Planning Policy

- 5.10 At a national level, the NPPF sets out the Government's aspirations and policies for planning which holds at its very heart a presumption in favour of sustainable development. Paragraph 7 is clear that the purpose of the planning system is to contribute to the achievement of sustainable development, giving the definition that at a very high level the objective of sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.11 Paragraph 8 of the Framework goes on to explain that sustainable development carries with it three fundamental objectives: an economic objective, social objective and an environmental objective. The social objective seeks to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided.
- 5.12 Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction including opportunities for meetings between people who might not otherwise come into contact with each other, and are safe and accessible so that crime and disorder do not undermine the quality of life or community cohesion. Paragraph 130 also makes clear that policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users.
- 5.13 Paragraph 111 indicates that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.



6. Assessment

Principle of the Development

- 6.1 Policy 18 of the County Durham Plan provides the main basis against which to assess the proposed development. It establishes a number of criteria which are expected to be met and demonstrated as part of an application, one of which seeks to ensure that the site offers a positive and safe environment for occupants and that there is appropriate access to local services and community facilities.
- 6.2 Thornley as a settlement possesses a range of local services and facilities including convenience retail, post office, library, primary school, village hall, barbers shop, medical centre, primary school, play area and various food outlets. Nearby Wheatley Hill also offers a similar and slightly broader range of facilities which are accessible by sustainable modes of transport including walking, cycling and bus.
- 6.3 The application property is well-positioned to access the various services and facilities within Thornley and Wheatley Hill with public transport options enabling access to larger settlements where a more comprehensive set of facilities would be available. The property has also previously been occupied as a residential dwelling, more recently as a house of multiple occupation by residents from different households. It is located within the settlement of Thornley, just off one of the main roads through it and within convenient walking distance of services, facilities and public transport links. For these reasons the site is considered to be a highly sustainable location offering good access to shops and services which would fulfil day-to-day needs in line with the requirements of part (b) of CDP Policy 18.
- 6.4 Part (a) of Policy 18 indicates a need for proposals to demonstrate that they will address any gaps in service provision to the satisfaction of the Local Planning Authority. Corporately, the Council have undertaken a review of care provision within its "Sufficiency Strategy for Children Looked After and Care Leavers 2020 2023". This outlined challenges faced by service provision as a result of the recent and ongoing pandemic with an increasing number of children entering care encountering delays caused by the impacts of Covid-19. This has led to an increase in children in need of care and whose care is not currently being met adequately which is accepted by the Council through its own evidence.
- 6.5 The review noted that in recent years there have been difficulties experienced by the Local Authority in matching children and young people in residential provision, and that as a result of this there is a greater need for smaller regulated children's homes within County Durham. The applicants have undertaken consultation with Durham County Council's Children's Services Team through which the shortage of smaller regulated homes has been confirmed. The provision of a smaller regulated home for up to four children would therefore address an existing gap in service provision within the County and help to address a shortfall in the number of spaces available to children in need of care within the region. The proposals are therefore considered to be compliant with the requirements of part (a) of Policy 18.
- 6.6 Part (c) of the policy indicates that proposals will only be permitted where the size/scale of the children's home would allow the occupants to be appropriately matched with regard to each child's welfare and taking into account their individual circumstances. As set out previously, whilst permission is being sought for the change of use of the premises for use as a children's home for up to four residents, it is the applicants' intention to accommodate up to three young people at any one time. The provision of a fourth bedroom would provide some flexibility for the group to accommodate siblings, such as two pairs of siblings or a larger family unit plus an additional person. The Moncur Group have an established set of policies which are aimed at ensuring the welfare and needs of children in care are met. Their Statement of Purpose, submitted as part of the application, makes clear that all admissions would be



- carefully matched, planned and managed and that no emergency referrals or placements would be accommodated.
- 6.7 The primary function of The Bungalow would be to provide nurturing residential care for children and young people who are unable to live at home with that care commencing once referrals have been processed, assessed and an agreed plan formed in conjunction with the young person and relevant authorities meaning that no placement would be made unless it is within the best interests of the child and the Local Authority. The Group's policies and the referral process more generally would ensure that any placements which would not be suitable for all residents do not go ahead meaning the welfare of children in care would be preserved. As such, although permission is sought for up to four children to be accommodated in the property, in practice the number of children in care would more likely be three as this is more likely to result in the appropriate placement of young people needing residential care.
- 6.8 The management policies put forward as part of this application are capable of being secured by appropriately worded conditions, accordance with which would ensure that the size/scale of the children's home would allow the occupants to be appropriately matched with regard for each child's welfare and taking into account their individual circumstances. The development is therefore considered to be acceptable in line with the requirements of part (c) of Policy 18 of the CDP.
- 6.9 The Moncur Group have undertaken a locality risk assessment in conjunction with Durham Constabulary which identifies potential risks associated with the site and surrounding area and has regard to latest crime statistics. The assessment concludes that with appropriate measures in place there would be no unacceptable risk to children in care here. With this in mind the application is considered to be acceptable in accordance with part (d) of Policy 18 of the CDP.
- 6.10 Taking the above into account it is considered that, as a matter of principle, the proposed change of use of the building to provide for a children's care home for up to four people would be acceptable and in accordance with the requirements of Policy 18 of the County Durham Plan.

Highways Safety

- 6.11 Parts (f) and (g) of Policy 18 of the CDP collectively seek to ensure that satisfactory parking, access and servicing can be achieved and that appropriate measures are in place to ensure access for emergency vehicles. Similarly, Policy 21 seeks to ensure that the impacts of development on the surrounding transport network are acceptable and that developments do not negatively impact upon users of the highway through the provision of appropriate levels of parking.
- 6.12 The existing dwelling benefits from a large double garage and driveway suitable for two further vehicles. On-street parking is available immediately adjacent to the property which is situated on a "dead end" road servicing only a small handful of properties. The surrounding area includes parts of open space served by existing roadways which formed part of the Coopers Close estate which has since been demolished in recent years and remains vacant with no known plans for redevelopment.
- 6.13 The Council's Parking and Transport SPD provides parking standards for new development, however it stops short of indicating minimum parking requirements for children's care homes and other residential institutions. As such, the assessment of the application largely centres on the policy requirement to provide "satisfactory parking" (Policy 18) at levels which are "sufficient for both occupants and visitors" as required by CDP Policy 21.



- 6.14 As explained above, the property would be staffed by two carers working in shifts over a 24 hour period with staff changeovers occurring at the end of each shift. Young people within the care home would not have access to vehicles and as such the parking requirements of the property would be generated by staff of which two would be resident at any one time. In light of this, the existing parking arrangements are considered to be satisfactory and would meet the daily needs of occupants of the property.
- Visitors to the site would be limited. Under normal circumstances, visits would be arranged with social workers approximately every 6 to 8 weeks. These meetings would be held on an appointment basis and incoming social workers would be expected at the property, allowing for arrangements to be put in place for visitors to park their cars at the premises. Most meetings would be held externally in a neutral venue meaning that vehicles would only be present on the site to pick up and drop off residents of the home where required, however under usual circumstances the Moncur Group would be responsible for transporting children to and from external appointments rather than care workers. Additional visits to the property may be made by management on an ad-hoc basis, with these visits largely being to check up on residents and staff and review or undertake routine maintenance of the property itself.
- 6.16 It is the applicants' view that parking provision within the curtilage of the property would be suitable and capable of accommodating the requirements for staff at the premises, with the surrounding road network capable of accommodating any overspill requirements from visitors to the site. As set out above, these visits would be infrequent and usually for short time periods only and would be unlikely to be of significance given the location and nature of the immediate surroundings of the property. For these reasons it is the applicants' view that the proposals would be acceptable in terms of parking provision and would not result in any adverse impact on highway safety. The application is therefore considered to be in accordance with Policies 18 and 21 of the CDP as a result.

Residential Amenity

- 6.17 Part (e) of Policy 18 of the CDP indicates that new children's homes will only be permitted where it is unlikely to cause unacceptable individual or cumulative impact on residential amenity, fear of crime or community cohesion. Similarly, Policy 31 seeks to ensure that there are no unacceptable impacts on residential amenity as a result of new development such as though increased noise, disturbance or overlooking, intrusion and loss of privacy.
- 6.18 The application proposes the change of use of the existing building from its current use as a dwelling to a children's home providing care for vulnerable and underprivileged young people. The level of noise and disturbance generated by proposals such as this are very difficult to quantify and the extent of impact can largely depend on the number of children in care, the adequacy of their placement, their needs and the effectiveness of care provided to them.
- 6.19 The proposed home would accommodate a maximum of four young people at any one time with a staffing ratio of two residents to one staff when at capacity. However, in practice the building would provide care for three or fewer residents recognising that this is an optimum number in terms of providing effective care and minimising potential issues that could cause harm to the amenity of nearby residents. This arrangement would be similar to that of a normal family home of this size with the past use of the property as a HMO being a material consideration in this instance.
- 6.20 The property is situated to the north of existing dwellings on Albert Street, the nearest of which has no openings on its northern elevation. The context of the surrounding area is such that the proposal would not lead to overlooking of existing properties and would not be considered to cause or give rise to any potential loss of privacy. Furthermore, with no external alterations proposed other than the insertion



- of a window on the northern elevation of the property, there would be no impact on local residents in terms of outlook, sunlight or daylight. Suitable standards of amenity would be retained in this respect in accordance with the aims of Policies 18 and 31 of the CDP.
- 6.21 Given the scale of the proposed development, noise and disturbance are likely to be comparable with the usual operation of a family residence with children and with appropriate management practices in place (which would be regulated by Ofsted) there is no reason to believe that occupants of the property would be any noisier or more badly behaved than other children. Whilst the dwelling is intended to provide accommodation for vulnerable young children it does not automatically mean that children would be unruly or have behavioural difficulties. Even if that were the case, such children can live in traditional family homes where management policies and regulation by Ofsted would be absent. In this instance, a minimum of two members of staff would be within the setting whilst children are resident and they would be responsible for the children in care, adhering to strict guidance and company policies to prevent disturbance to the young people at the property and create a peaceful, relaxing and "family like" environment. The indirect consequence of the company's approach is that noise and other disturbances are unlikely to be any different to the use of the building as a residential dwelling occupied by a family or by persons unconnected with one another as has been the case here previously. In addition, the staffing provision overnight would include "waking watch" with one member of staff awake at all times to ensure the safety of all children in care.
- 6.22 Similarly, the level of vehicular activity at the site is unlikely to be significantly different to that of a family dwelling where comings and goings would be expected to be fairly regular. The company's approach would see children in care driven to and from schools and other extra curricular activities by staff who would also be responsible for upkeep of the property and usual household tasks such as shopping for groceries. Visitors to the site would be likely to be limited and, in terms of care visitors, these would be expected to be every six to eight weeks. However, most visits are likely to take place in a neutral setting with children driven to that appointment by a member of staff rather than care workers visiting the property themselves. Other trips to and from the property would centre on staff handover times which, as a policy, are undertaken outside of the busiest times during the day to minimise potential issues around school runs and work commutes. Occasional visits by management would be made, however these would be infrequent and for short periods of time. Consequently, the level of vehicular trips would be comparable to a residential property of this size and would be unlikely to cause any issues for residents as a result. Given the availability of parking at the property and on public roads nearby it is unlikely that additional parking associated with the property for visitors and staff would become a nuisance for existing residents.
- 6.23 Having regard to the above it is the applicants' view that with effective management policies in place and adherence with company guidelines there would be no harmful impacts upon the amenity of local residents as a result of the proposed development. The proposals are considered to be acceptable, in accordance with the requirements of Policies 18 and 31 of the CDP and consistent with the aims of the NPPF in these respects.



7. Conclusions & Summary

- 7.1 The application proposes the change of use of an existing residential dwelling within the settlement limits of Thornley to a children's home. The site is in a highly sustainable location with good access to local services and facilities and which is complemented by good public transport links to the villages of Wheatley Hill and Wingate where a greater variety of shops, services and schools exist.
- 7.2 The application property is well situated to ensure that the day-to-day needs of those proposed to be in care would be catered for. It offers a safe environment for the occupants to live in and the size of the home is small with the number of children proposed by the applicants set at a maximum of four with specialist staff, care policies and vetting procedures in place to ensure that residents would create a welcoming home dynamic. In practice, three children would be resident in the property at any one time, however flexibility is sought in the maximum number of children in the event that suitable matching can be found, for example in instances involving siblings.
- 7.3 It is unlikely that there would be any individual or cumulative impacts on the amenities of local residents and the wider community with a management strategy proposed to be put in place to minimise disturbance upon neighbouring residents. The home is expected to operate as close to a normal family home as possible with vehicle movements to and from address being comparable to those associated with a normal functioning family residing in the dwelling. Round the clock staffing would ensure that noise and other disturbance would be kept to a minimum including during night-time hours.
- 7.4 The house benefits from safe and convenient access to and from the highway network and is well placed for accessing public transport links. The number of staff required at the property is limited owing to the small number of residents proposed and it would not result in any significant increase in parking demand or additional movements to and from the property, particularly during unsociable hours. The surrounding highway network is subject to 30mph speed restrictions with good visibility along the highway from the site in both directions with on-street parking available in addition to the driveway and garage parking facilities at the property. There are not considered to be any highway safety implications associated with the proposed development and, as such, the proposal is considered to be acceptable in relation to all matters of highway safety.
- 7.5 The proposal would accord fully with all relevant national and local planning policies and, whilst the change of use of the property would have no notable impact upon delivery of housing across the County, in specific relation to the provision of specialist accommodation it would contribute significantly to providing new housing to address an evidenced shortfall in specialist care provision identified by the Council's Children's Services Team. This is a factor which should be afforded significant weight in the overall planning balance and in the determination of the application.
- 7.6 There are not considered to be any reasons to withhold planning permission for the proposed development in this case and the Council is therefore invited to support the proposal and grant planning permission without delay in line with paragraph 11 of the NPPF.



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