

**34 Sandford Road  
Bromley  
Kent  
BR2 9AW**

**PLANNING,  
DESIGN AND  
ACCESS  
STATEMENT**

**August 2023**

**GTLY PLANNING.**

## Table of Contents

1.	Introduction	1
2.	The application site and surrounding area	2
3.	Planning history and the proposed development	3
4.	Planning Policy	4
5.	Planning Assessment	8
6.	Conclusion and Planning Balance	13

# 1. Introduction

1.1. This Planning, Design and Access Statement is written in support of an application for full planning permission made by Mr C Salt (“the applicant”) proposing the development of land at 34 Sandford Road, Bromley (“the application site”).

1.2. The development proposed in this application comprises:

*Conversion of detached annex building into 1 bedroom dwelling together with the construction of a single storey rear extension, refuse and recycling stores, cycle parking and hard and soft landscaping.*

1.3. The application is supported by the drawings listed in the table below.

Drawing Number	Title
5778-22-PL011 P2	Existing and Proposed Plans; Existing Elevations
5778-22-PL012 P1	Approved and Proposed Elevations
5778-22-PL013 P2	Existing, Approved and Proposed Block / Roof Plans

Table 1: Submitted drawings

1.4. This application is submitted to LB Bromley (“the Council”) following a grant of planning permission for the proposed extension of the annex building, granted under reference number 22/04601/FULL6 (dated 10 March 2023). The extensions proposed in this application are of an identical scale, design and finish to those already approved at the property and as such, although this Statement addresses design matters, it is relevant to note that this stage that the proposal has been found acceptable in that regard.

1.5. Essentially, therefore, this application proposes the construction of a pre-approved extension to the annex and the sub-division of the plot in order to make optimal use of underdeveloped land in a highly sustainable location for additional housing, designed to meet locally identified housing needs.

1.6. The following sections of this Statement describe the site and its context; review the site’s planning history and the proposed development; summarise the objectives of relevant planning policies and sets out the case for compliance, concluding in a recommendation that conditional planning permission should be granted for the proposed development.

## 2. The application site and surrounding area

- 2.1. The application site is shown outlined in the aerial photograph at Image 1, below. It comprises the detached house and curtilage at 83 Lovibonds Avenue, which extends to an area of approximately 0.01ha.



Image 1: Aerial photograph showing application site approximately outlined in red

- 2.2. The existing house comprises a 2 storey semi-detached house with a single storey annex to the south side. The main house stands behind a hard surfaced front garden area with parking available for 2 cars. To the front of the annex is an access path, flanked by areas of grass and planting.
- 2.3. The site is located immediately to the north of Streamside Close and is within very easy walking distance of Bromley South station, and the town centre.
- 2.4. The application site is identified on the adopted Policies Map as being in an area of Public Open Space Deficiency and a deficiency in Biodiversity and Access to Nature.
- 2.5. The application site does not contain and is not in the setting of any statutory or locally listed buildings; and has a PTAL score of 6a, demonstrating the ease of access to the site by public transport.
- 2.6. The application site's rear boundary is lined by the River Ravensbourne (shown on the aerial image above). The main part of the application site is, therefore, within Flood Zone 2 but the front of the site is in Flood Zone 1.
- 2.7. The area surrounding the site is predominantly in residential use, comprising suburban housing, leading to higher density residential development in and around Bromley town centre.

### 3. Planning history and the proposed development

- 3.1. This section summarises the planning history on the application site and then describes the proposed development.

#### Planning history

- 3.2. As noted above, planning permission was granted under reference 22/04601/FULL6 (dated 10 March 2023) for the construction of a single storey rear extension to the annex.
- 3.3. In considering the design of the proposed extension, the Delegated Report concludes, *“Having regard to the form, scale, siting and proposed materials it is considered that the proposed extension would complement the host property and would not appear out of character with surrounding development or the area generally.”*
- 3.4. In their report, the case officer further concluded that the development would not give rise to any harm to the amenity of neighbouring residents through a loss of light, loss of outlook, or loss of privacy.
- 3.5. Finally, there was no objection to the development from the Environment Agency or the Council on flood risk, or drainage grounds.
- 3.6. Conditional planning permission was, therefore, granted and can be implemented by the applicant. This permission represents a material consideration of very significant weight.

#### The proposed development

- 3.7. The development proposed in this application comprises the conversion of the annex into a one bedroom single storey dwellinghouse together with the construction of the extension approved by the Council under reference 22/04601/FULL6.
- 3.8. The development requires minor changes to the front elevation, comprising the relocation of the front door from its central position to the northern side of the elevation. A pair of windows are then equally separated across the front elevation of the proposed house. Internally, the existing annex will be converted to provide a large double bedroom (13.9sqm) to the front of the property with the bathroom and kitchen also contained within the extent of the existing building.
- 3.9. To the rear, most of the new (approved) extension will provide a large living area with a skylight over and bi-folding doors providing access into a large private rear garden area.
- 3.10. The proposed home will extend to an area of 64.1sqm (GIA) with a private garden of approximately 80sqm. The house has been designed to meet Part M4(2) of the Building Regulations.
- 3.11. The proposed extension will be constructed from smooth rendered walls, painted white to match the existing.
- 3.12. The proposed house will be a car free dwelling, but with compliant cycle parking provided within a storage shed in the front garden adjacent to the proposed refuse storage shed.
- 3.13. The existing house will continue to be provided with 2 car parking spaces and as such there will be no alterations to the access to that property.

## 4. Planning Policy

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that applications for planning permission are decided in accordance with the development plan unless material considerations indicate otherwise.
- 4.2. The development plan for Bromley comprises the adopted Local Plan (2019) and the London Plan (2021).
- 4.3. The Government's policy aims as outlined in the National Planning Policy Framework ("NPPF") are a material consideration.
- 4.4. This section of the Statement identifies and introduces the policies relevant to the outcome of the application with the proceeding section undertaking an assessment of the proposed development in the light of these objectives. The below does not address every policy relevant to the application, but summarises the objectives of those considered to be most important to the proposed development.

### NPPF

- 4.5. The National Planning Policy Framework (NPPF) was updated in July 2021 by the Ministry of Housing, Communities and Local Government. The document sets out the government's economic, environmental and social planning policies for England.
- 4.6. The overarching national planning policy theme evident from the NPPF is a presumption in favour of sustainable development, which the Government have advised should be at the heart of the planning system. In terms of development management, it advises that the primary objective is to foster the delivery of sustainable development and should not hinder or prevent future development.
- 4.7. The NPPF has not changed the statutory status of the Development Plan as the starting point for decision-making; however, it constitutes guidance for local planning authorities and decision-making both in drawing up plans and as a material consideration in determining applications.
- 4.8. At Section 2 the NPPF explains that the purpose of the planning system is to contribute to achieving sustainable development, which is explained to be development which meets the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.9. There are 3 overarching and mutually interdependent objectives to the planning system which need to be pursued. These are defined in the NPPF as being first, an economic objective with the aim of building a strong, responsive and competitive economy, supporting growth and innovation. Second, a social objective with the aim of building strong, vibrant and healthy communities with accessible services which support health, social and cultural wellbeing. Third, an environmental objective which requires the protection and enhancement of our natural, built and historic environment through the effective use of land, improving biodiversity, minimising waste and moving to a low carbon economy.
- 4.10. At paragraph 10, the NPPF sets out a presumption in favour of sustainable development with paragraph 11 explaining that for decision taking this means approving development which is compliant with an up-to-date development plan without delay.

- 4.11. Paragraph 11 d) confirms that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:
- the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the proposed development; or
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
- 4.12. Footnote 7 to paragraph 11 d) confirms that “out-of-date” includes situation where a Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites.
- 4.13. Section 5 relates specifically to the delivery of new housing. It recognises the importance of significantly boosting housing supply and paragraph 60 states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 4.14. Paragraph 74 sets out the requirement for authorities to identify and update annually a supply of specific deliverable sites to provide a minimum 5 year supply of housing against adopted policy targets. The supply of deliverable sites should include an additional buffer of 5% to ensure choice and competition in the market for land.
- 4.15. Section 5 of the NPPF relates specifically to the delivery of new housing. It recognises the importance of significantly boosting the housing supply and paragraph 60 states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 4.16. At paragraph 69, the NPPF acknowledges the important contribution small and medium sized sites can make to meeting local housing requirements, recognising that such schemes are usually quick to build out. It continues by saying that Councils should support the development of windfall sites through decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 4.17. Chapter 11 is entitled ‘Making Effective Use of Land’ and Paragraph 120d) sets out the planning policies and decisions should promote and support the development of underutilised land and buildings.
- 4.18. Paragraph 124 sets out that development should make efficient use of land, taking into account the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it.
- 4.19. Chapter 12 relates to creating well designed places. Paragraph 126 stresses that good design is a key aspect of sustainable development as it creates better places to live and work and makes development acceptable to communities. Paragraph 130 requires developments to function well and add to the overall quality of the area, be visually attractive, sympathetic to local character and history, establish or maintain a strong sense of place and optimise the potential of the site and create places which are safe, inclusive and accessible.

## London Plan (2021)

- 4.20. The London Plan (2021) is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Mayor's strategic policies aim to provide more homes and to create a housing market that works better for all Londoners. The London Plan (2021) is a part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Some of the key policies are summarised below.
- 4.21. Policy GG2 'Making the Best Use of Land' seeks to create successful, sustainable mixed-use places that make the best use of land. Part (a) specifies that the development of brownfield land should be enabled, particularly on small sites. Part (b) specifies that well-connected sites should be prioritised. Part (c) sets out that those involved in planning and development should proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in well-connected locations.
- 4.22. Policies D3 'Optimising Site Capacity Through the Design-Led Approach' and D4 'Delivering Good Design' both emphasise the importance of creating high quality spaces and require development to make the best use of land by following a design-led approach that optimises the capacity of sites by responding to an area's context and capacity for growth.
- 4.23. Policy D6 'Housing Quality and Standards' emphasised the importance of high quality design and requires development to provide adequately sized rooms with comfortable and functional layouts. It encourages the maximum provision of dual aspect units and seeks to ensure that accommodation receives sufficient daylight and sunlight. The policy also requires amenity space at the standard of 5 sqm per 1-2 person unit and 1 sqm per each additional occupant unless there are no higher local standards.
- 4.24. Policy H1 'Increasing Housing Supply' provides ten-year housing targets for each of the boroughs. It states that Bromley is required to deliver 7,740 dwellings between 2019/20 and 2028/29, equating to 774 homes per annum. To ensure that these targets are met, the policy specifies that boroughs should optimise the potential for housing delivery on all suitable and available housing sites. The policy lists certain sources of capacity which are particularly important, which includes small sites.
- 4.25. Policy H2 'Small Sites' explains that Boroughs should pro-actively support new homes on small sites, which are defined as those of less than 0.25ha in area. The Policy recognises the important contribution such developments make to meeting London's housing needs as well as providing a mix of housing size and type while supporting SME developers. The policy requires that Councils exceed the targets at Table 4.2, which for Bromley require the delivery of 3,790 homes on small sites across the Plan's 10 year period, equating to 379 homes on such sites per annum.
- 4.26. Bromley's small sites housing target accounts for 49% of the overall minimum housing target, emphasising the importance of such sites to the Council meeting its housing targets.
- 4.27. Policy T6 relates to car parking and sets out that this should be restricted in line with levels of public transport accessibility with car free development being the starting point for all proposals which are well connected by public transport. Part D of the policy explains that the Plan's maximum car parking standards should be applied to development proposals.



- 4.28. Policy T6.1 concerns residential parking and explains that levels of car parking should not exceed the maximum standards set out in Table 10.3. The Table sets out that in all areas with a PTAL score of 5-6, the maximum parking provision is car free.

### **Bromley Local Plan (2019)**

- 4.29. Policy 1 'Housing Supply' outlines how the Council will make provision for a minimum average of 641 additional homes per annum (this target having been replaced by the higher target of 774 in the London Plan). One of the policy's key areas of focus is to support housing delivery on windfall sites in the Borough.
- 4.30. Policy 4 concerns housing design and advises that all new housing developments will need to achieve a high standard of design and layout whilst enhancing the quality of local places. The policy seeks to ensure that developments respect local character and spatial standards while setting out 10 detailed objectives which are to be met in order to demonstrate that a development will provide a high quality, sustainable living environment for future residents.
- 4.31. Policy 30 relates to parking and requires a minimum of 0.7 and a maximum of 1 car parking space for each 1 bedroom property with a PTAL score of 2-6. It should be noted, however, that the London Plan's parking standards supersede those in the Local Plan as they are the most up to date standards in the development plan.
- 4.32. Policy 37 'General Design of Development' requires all development proposals to be of a high standard of design and layout. It also sets a number of criteria including that developments will be expected to be imaginative and attractive; positively contribute to the street scene and respect heritage assets; provide attractive settings around buildings; allow for adequate daylight and sunlight; respect the amenity of occupiers of neighbouring buildings; address sustainable design and construction; meet the principles of inclusive design; include security and crime prevention measures; incorporate recycling and waste storage facilities; and respect non designates heritage assets.
- 4.33. Policy 116 advises that all developments should seek to incorporate SuDS or demonstrate alternative sustainable approaches to the management of surface water as far as possible.

## 5. Planning Assessment

- 5.1. In the light of the matters addressed above, it is considered that there are four principal matters for consideration, as follows:
- I. Principle of development;
  - II. Design, including amount, scale and external appearance;
  - III. Residential amenity considerations; and
  - IV. Compliance in respect of technical matters.

### Principle of development

- 5.2. The NPPF, London Plan and Local Plan are all consistent in pro-actively supporting windfall housing development on small sites such as the application site. The adopted policy position makes clear that the redevelopment of such sites make an important contribution to meeting London's housing needs and it is notable that a significant proportion of LB Bromley's housing targets comprises housing development on sites such as the application site.
- 5.3. Although the site is largely located within Flood Zone 2, as the proposal comprises the conversion of an existing building together with the construction of an already approved extension, the sequential test policies in the NPPF and development plan are not engaged. Accordingly, the site's location in Flood Zone 2 does not impact on the principle of development in this case.
- 5.4. The application site comprises underdeveloped housing land in a sustainable and highly accessible location with excellent access to shops, services, amenities and public transport connections. It is, therefore, the case that the principle of development at the site is acceptable and attracts strong policy support.

### Design, including amount, scale and external appearance

- 5.5. As introduced above, the objective of the NPPF, London Plan and Local Plan is to ensure that developments are well designed, compatible with the character of an area. That said, the London Plan makes clear at Policy H2 that in order for Councils to meet small sites housing targets, it is inevitable that an area's character will evolve over time and the development plan and NPPF further set out that a site's development potential should be optimised using a design-led approach.
- 5.6. The Local Plan, at Policies 4 and 37, seeks to ensure that new developments achieve a high quality of design and layout, compatible with the character of the surrounding area and built from high quality materials.
- 5.7. The planning permission granted by the Council under reference 22/04601/FULL6 for the construction of a single storey rear extension to the annex is a material consideration of great weight in this application. That permission approved an extension to the annex identical in scale, layout and design to that which is proposed in this application.
- 5.8. In considering the design of the proposed extension, the Delegated Report concludes, "*Having regard to the form, scale, siting and proposed materials it is considered that the proposed extension would complement the host property and would not appear out of character with surrounding development or the area generally.*"

- 5.9. There has been no change to policy objectives between the time of that permission being granted and this application being submitted. Accordingly, the conclusion outlined in that report, including the scheme's compliance with the design policies in the development plan, must apply in this case and the design of the proposed development should be supported.
- 5.10. It is, therefore, concluded that the design of the proposed development is acceptable and meets the objectives of the development plan and the NPPF.

### **Residential amenity considerations**

- 5.11. The development plan seeks to ensure that neighbouring residents' amenities are not unacceptably harmed as a consequence of new development and further seeks to ensure that future occupants are provided with high quality living environments.

#### Relationship with neighbours

- 5.12. Policy 37 requires new development to respect the amenity of occupiers of neighbouring buildings by ensuring that they are not harmed by noise and disturbance, have adequate levels of daylight, sunlight, privacy and are not harmed by overshadowing.
- 5.13. In their report associated with the permission granted under reference 22/04601/FULL6, the case officer concluded that the development would not give rise to any harm to the amenity of neighbouring residents through a loss of light, loss of outlook, or loss of privacy.
- 5.14. Given the absence of any change to the scale and design of the extension, the proposed physical relationship with the neighbours is identical to that which has already been approved. The only change to be considered, therefore, is the proposed use of the converted and extended annex as a separate dwelling and whether this would bring about any unacceptable impact on the amenity of neighbouring residents.
- 5.15. The neighbour to the south at no.40 Sandford Road is separated from the application site by the highway along Streamside Close (a physical separation of approximately 11m) as well as c.2m tall boundary fencing. Accordingly, the change of use of the annex into a separate dwellinghouse will not give rise to any material impact on the living conditions, privacy or amenity of those neighbours.
- 5.16. Neighbours to the west, along Streamside Close are generously separated from the site with the closest neighbour at no.9 being approximately 40m from the rear elevation of the proposed house, separated by the proposed garden, the retained garden for no.34 and the well established tree belt which runs along the river bank. Accordingly, the development will not have any material impact on the living conditions, privacy or amenity of the neighbouring residents along Streamside Close.
- 5.17. There will be no material alteration to the relationship between the site and the houses to the opposite side of Sandford Road and again, therefore, there will not be any adverse effect on the amenity of these neighbours.

- 5.18. The only change to be considered, therefore, is the effect of the development on the donor house at no. 34 Sandford Road. The proposed rear extension to the annex has already been approved, but it remains necessary to consider the impact the extension will have on the amenity of the occupiers of no.34. As shown at drawing no.PL011 P2, the extension stands close to the ground floor kitchen / breakfast room within no.34 and although it would extend beyond the rear wall of this room by c.2.6m, given the flat roof design and separation from the rear-facing window in this room, there would be no adverse impact on outlook.
- 5.19. From all other habitable rooms within no.34, the rear extension to the annex building would not be visible, or would be so well separated as to have no material visual impact.
- 5.20. From the rear garden in no.34, the extension to the annex would be well concealed behind the new boundary fence and given the generous rear garden which those occupants would continue to enjoy, there will not be any material visual impact or overbearing effect. Accordingly, the rear garden at no.34 will continue to be a high quality, private space which occupants of that property will continue to enjoy.
- 5.21. The conversion of the annex will not create any material change to the access arrangements to no.34 with the crossover being unaffected and the 2 car parking spaces on the forecourt being retained.
- 5.22. Overall, therefore, the proposed house will not have any material or unacceptable impact on neighbouring residents, whose privacy, amenities and living conditions will be unaffected by the development. As such, the application meets the objectives of the development plan in this respect.

#### Quality of accommodation for future residents

- 5.23. Local Plan Policy 4 relates to housing design and seeks to ensure that new developments meet minimum space standards detailed in the London Plan together with the provision of adequate outside space to meet future residents' needs.
- 5.24. The London Plan sets out at Policy D6 that housing should be of a high quality design with adequately sized rooms, a dual aspect design, adequate internal light and with adequate internal space, as detailed at Table 3.1 of the Plan. Table 3.1 sets out that 1 bedroom, 2 person homes must be at least 50sqm in area (GIA).
- 5.25. In terms of outside space, Policy D6 requires a minimum of 5sqm for 2 person homes.
- 5.26. The house proposed in this application will extend to 64.5sqm (GIA), well in excess of the minimum standard required by the London Plan. The house will be of a quadruple aspect design with windows to the front, rear and both side elevations. This design will ensure that the house is well lit throughout the day with very good levels of cross ventilation, altogether ensuring a very high quality internal living environment.
- 5.27. The rear garden shown on drawing number PL013 P2 extends to an area of approximately 80sqm in area, again considerably in excess of the minimum requirement set out at London Plan Policy D6.
- 5.28. The proposed house and garden will provide high quality, private spaces for the future occupants without any unacceptable level of overlooking from neighbouring residents and this can be further ensured through landscaping which will be delivered as part of the development.

- 5.29. In the light of the foregoing, it is considered that the proposed house will provide a very high quality living environment for future residents with all targets outlined in the London Plan and Local Plan being at least met, if not considerably exceeded.

### **Compliance in respect of technical matters**

- 5.30. The other technical matters relevant to the outcome of this application comprise highways impacts, and flood risk and drainage considerations.

#### **Highways impacts**

- 5.31. The London Plan makes clear that the starting point for development proposals is a “car free” approach, encouraging enhanced use of public transport in areas of best connectivity. Policy T6.1 and associated Table 10.3 develop this further, establishing maximum parking standards to be applied to residential development proposals in London with a requirement that developments are car free in areas with a PTAL score of 5-6.
- 5.32. As identified above at paragraph 2.5, the application site has a PTAL score of 6a and is, therefore, very well served by public transport connections, including by train from Bromley South and multiple bus services, including night bus services, in Bromley town centre.
- 5.33. Given the ease of access to the site by public transport, the proposal for a car free development within the application, while preserving existing car parking arrangements for the retained house, is supported by the development plan.
- 5.34. In terms of cycle parking, London Plan Policy T5 requires that developments encourage cycling through the inclusion of appropriate levels of parking in new proposals. Developments should provide cycle parking at least in accordance with the minimum standards at Table 10.2. For a 1 bedroom, 2 person dwelling, Table 10.2 requires the provision of at least 1.5 cycle parking spaces.
- 5.35. The proposed development includes the provision of a secure, covered cycle store to the front of the house with capacity for 2 bikes, in excess of the minimum standard. Additional casual cycle parking can be accommodated in the rear garden.
- 5.36. Finally, adequate provision is made for refuse and recycling storage with a store provided to the front of the proposed house, conveniently located for use by future residents and for collections.
- 5.37. In the light of the foregoing, the development will not give rise to any adverse or unacceptable highway impacts. The proposal meets and exceeds the requirements of the development plan and as such is acceptable in this regard.

#### **Flood risk**

- 5.38. Local Plan Policy 115 deals with flood risk and explains that the Council will seek to manage and reduce flood risk from all sources of flooding and further sets out that development will be required to seek opportunities to deliver flood risk reduction compared with the existing situation.
- 5.39. During the course of the previous application, the Council consulted with the Environment Agency, which had no objection to the construction of the proposed extension on flood risk, or drainage grounds.

- 5.40. The development proposed in this application comprises the conversion of an existing building and the construction of an already approved extension. Accordingly, there will be no increase in flood risk to arise from the development and the safety of future occupants has already been assessed and considered acceptable. Accordingly, the proposed development is considered to meet the objectives of Local Plan Policy 115.

## 6. Conclusion and Planning Balance

- 6.1. The development proposed in this application comprises the conversion of the existing annex into a 1 bedroom dwelling together with the construction of an extension which already has planning permission, granted by the Council under reference 22/04601/FULL6 (dated 10 March 2023).
- 6.2. The development will deliver a 1 bedroom home in a highly sustainable and accessible part of the Borough, very close to public transport connections and Bromley town centre. Accordingly, there is strong policy support for the principle of development at the site.
- 6.3. The design of the extension has already been found acceptable by the Council and that same conclusion must again apply in this case.
- 6.4. It has been demonstrated above that the development will deliver a very high quality living environment for future residents without causing any harm to the amenity of neighbours.
- 6.5. The proposal to deliver a car free development in this area of very high public transport accessibility is supported by the up to date policies in the London Plan and the development also delivers more cycle parking than is required by adopted standards.
- 6.6. Accordingly, it is considered that the development meets with the objectives of the development plan and as such, the planning balance falls in favour of a grant of planning permission. Pursuant to paragraph 11c) of the NPPF, planning permission should, therefore, be granted without delay, subject to necessary safeguarding planning conditions.