

A1 WA/2018/2196 - Outline application for erection of up to 50 dwellings (15 affordable) with access from Badshot Lea Road (access only to be determined) at Land At Green Lane Farm Green Lane Badshot Lea (as amplified by additional access plans received 28/05/2019 and amended indicative layout plan received 22/08/2019)

Committee Meeting: Joint Planning Committee 25/09/2019
Ward: Farnham Weybourne and Badshot Lea
Case Officer: Rachel Kellas

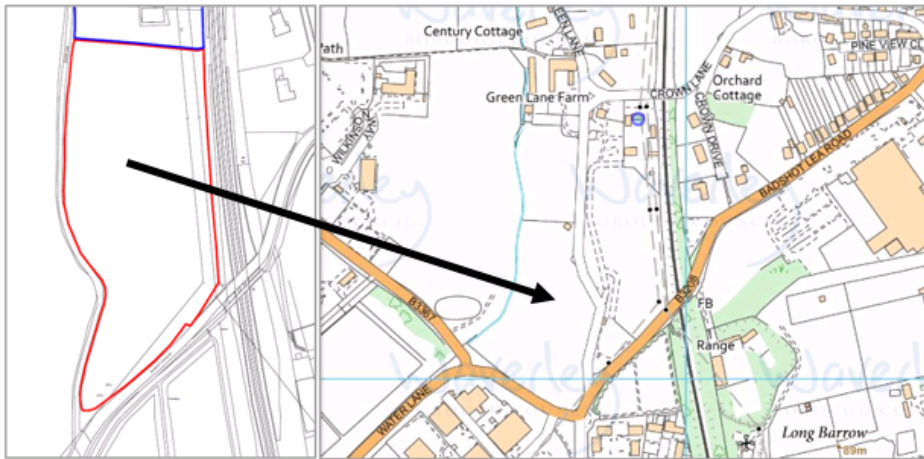
RECOMMENDATION A: That, subject to the completion of a legal agreement to secure contributions towards Farnham Park SANG, 30% on site affordable housing and maintenance of the SuDS, open space and play areas by 25/03/2020 and subject to conditions, permission be GRANTED.

RECOMMENDATION B: That, in the event that the requirements of recommendation A are not met, that permission be REFUSED.

1. Summary

The application has been brought before the Joint Planning Committee because the proposal does not fall within the Council's Scheme of Delegation. This is an outline application for the erection of up to 50 dwellings on land at Green Lane Farm, Badshot Lea with all matters reserved except access. The application site is considered appropriate for residential development as it is adjacent to the developed area of Farnham, within a sustainable location – this view is supported by a recent appeal decision on an adjacent site. The indicative scheme layout indicates that an acceptable form of development, the impact on the landscape character is considered acceptable and measures could be secured to protect neighbour amenity.

2. Location plan:



3. Site Description

The application site measures 1.95 hectares and is located to the north of Badshot Lea Road, and to the west of the railway line. The site is on low lying ground set below Badshot Lea located to the east. The site contains a paved area which at the time of the site visit was used for the storage of vehicles. An access road connects this to Green Lane Farm to the north which comprises a small commercial area and residential property. There are commercial uses and a cemetery to the south. To the west is an open field subject of permission WA/2016/2456. There is an existing hedgerow which runs along the boundary with Green Lane and Badshot Lea Road.

4. Proposal

Outline permission is sought for the erection of 50 dwellings (15 affordable) with access from Badshot Lea Road (access and scale to be determined).

The proposed access comprises a priority junction with Badshot Lea Road on the south east of the application site.

The 35 open market dwellings would comprise:

- 4 x 1-bed flats (58 – 61 sqm)
- 15 x 2-bed houses (81sqm)
- 12 x 3-bed houses (3 measuring 93sqm and 8 measuring 105sqm)
- 5 x 4-bed houses (2 measuring 147sqm and 3 measuring 163sqm)

The 15 affordable dwellings would comprise:

- 4 x 1-bed flats (54 – 61.5 sqm each)
- 6 x 2-bed houses (79sqm each)
- 5 x 3-bed houses (measuring 93 sqm each)

5. Indicative layout plan



6. Relevant Planning History

There is no relevant planning history.

7. Planning Policy Constraints

Outside built up area boundary - Countryside beyond Green Belt
Farnham/Aldershot Strategic Gap
Thames Basin Heaths 5km SPA Buffer Zone
Minerals Safeguarding Area
Southern Gas Networks - GPL

8. Development Plan Policies and Guidance

The development plan and relevant policies comprise:

Waverley Borough Local Plan, Part 1, Strategic policies and sites (adopted February 2018):

- SP1 - Presumption in Favour of Sustainable Development
- SP2 - Spatial Strategy
- ALH1 - The Amount and Location of Housing
- ST1 - Sustainable Transport
- ICS1 - Infrastructure and Community Services
- AHN1 - Affordable Housing on Development Sites
- AHN3 - Housing Mix
- EE2 - Protecting Existing Employment Sites
- TCS3 – Neighbourhood and Village Shops
- LRC1 - Leisure and Recreational Facilities
- TD1 - Townscape and Design
- NE1 - Biodiversity and Geological Conservation
- NE2 - Green and Blue Infrastructure
- NE3 - Thames Basin Heaths Special Protection Area
- CC2 - Renewable Energy Development
- CC4 - Flood Risk Management

Farnham Neighbourhood Plan (made May 2017):

- FNP1 - Design of New Development and Conservation
- FNP12 - Thames Basin Heaths Special Protection Area (SPA)
- FNP13 - Protect and Enhance Biodiversity
- FNP15 – Small Scale Dwellings
- FNP30- Transport Impact of Development
- FNP32- Securing Infrastructure

Waverley Borough Local Plan 2002 (retained policies February 2018):]

- D1 - Environmental Implications of Development
- D4 - Design and Layout
- D6- Tree Controls

- D7 - Trees, Hedgerows and Development
- D8 - Crime Prevention
- IC2- Safeguarding Suitably Located Industrial and Commercial Land
- TC3 - Development within Town Centres
- M5 - Provision for Cyclists

South East Plan:

- Policy NMR6 - Thames Basin Heaths SPA

Policy of the Surrey Waste Plan Policy 2008:

- CW1 - Waste minimisation
- DC1 - Safeguarding Sites

Policies of the Surrey Minerals Plan Core Strategy 2011:

- MC4 - Efficient use of mineral resources
- MC5 - Recycled and secondary aggregates
- MC6 - Safeguarding mineral resources and development

In accordance with the National Planning Policy Framework (NPPF) due weight has been given to the relevant policies in the above plans.

Other guidance:

- National Planning Policy Framework (2019)
- National Planning Practice Guidance
- Land Availability Assessment (2016)
- West Surrey Strategic Housing Market Assessment (2015)
- Infrastructure Delivery Plan (2012)
- Open Space, Sport and Recreation (PPG17) Study 2012
- Statement of Community Involvement (2014 Revision)
- Strategic Flood Risk Assessment (2015/2016)
- Council's Parking Guidelines (2013)
- Residential Extensions SPD (2010)
- Vehicular and Cycle Parking Guidance (Surrey County Council 2012)
- Waverley Local Plan Strategic Highway Assessment (Surrey County Council, 2016)
- Farnham Design Statement (2010)
- Employment Land Review (2016)

9. Consultations and Town/Parish Council Comments

<p>Council's Environmental Health Officer</p>	<p>Noise – no objection subject to conditions to secure a Construction Environmental Management Plan</p> <p>Odour – whilst historic complaints regarding odour generated by the sewage treatment works on Monkton Lane have been received, Farnham Sewage Works have carried out extensive works and moved the sludge treatment works of the site out of the area.</p> <p>No recent complains received – no objection raised subject to inclusion of an informative.</p>
<p>Council's Environmental Pollution Control Officer</p>	<p>No action required</p>
<p>Council's Housing Enabling Officer</p>	<ul style="list-style-type: none"> • Proposed tenures align with the ownership mix recommended in the SHMA • Support proposed housing mix which broadly aligns with SHMA requirements • The requirement to agree the final affordable bed size and tenure mix in writing with the Council should be set out in the S106 agreement, in consultation with the affordable housing provider taking on the units. • The affordable homes are concentrated in the middle of the site, with a block at the south west of the site. Recommend exploring whether the affordable can be dispersed further, into 3 smaller clusters. The design would easily allow for some of the affordable homes to be located in another part of the site, preferably facing private market units as neighbours.
<p>County Archaeological Officer</p>	<p>Site has a moderate to high potential for the discovery of pre-historic remains, particularly from the Neolithic period. It is clear therefore that further archaeological investigations will be required and in the first instance this should take the form of a comprehensive trial trench evaluation of the site. This will ensure that any archaeological remains that are present are characterised and an appropriate mitigation strategy devised.</p> <p>Agree that the required work could be secured by use of a condition.</p>

County Highway Authority	Original response: Further information required, including details of formal pedestrian crossing.
Environment Agency	Refer to standing advice
Farnham Town Council	Object: The additional highways measures do not make this application acceptable. FTC strongly objects to the erection of 50 dwellings. It is outside the Built Up Area Boundary and not compliant with Farnham Neighbourhood Plan Policies FNP1, FNP10, FNP11. The location is not an approved Farnham Neighbourhood Plan site, a large amount of development on an approved site is underway to the east of Badshot Lea to prevent coalescence to the southwest. The increase in traffic from the adjacent site granted at appeal, and the cumulative effect of this site, will have a further negative impact on the local infrastructure.
Lead Local Flood Authority	Satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and can recommend planning permission is granted. We would however recommend that should planning permission be granted, that suitably worded conditions are applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development.
Natural England	Natural England has been consulted on an Appropriate Assessment for the application in accordance with Paragraph 63 (3) of the Conservation of Habitats and Species Regulations 2017. Natural England has no comments to make on this application, as long as the relevant avoidance and mitigation measures specified in the Appropriate Assessment are secured.
Thames Water	Foul Water sewage network infrastructure capacity - no objection Surface Water – no objection on basis that surface waters will NOT be discharged to the public network

10. Third Party Representations

In accordance with the statutory requirements and the “Reaching Out to the Community – Local Development Framework – Statement of Community Involvement – August 2014” the application was advertised in the newspaper on 18/01/2019 site notices were displayed around the site on 17/01/2019 and neighbour notification letters were sent on 10/01/2019.

23 letters have been received raising objection on the following grounds:

Conflict with Development Plan Policies:

- The land is not an approved FNP (Farnham Neighbourhood Plan) site for development.
- Outside Built Up Area Boundary.
- The site does not form part of the Waverley Development Plan.
- Badshot Lea area is already set to grow by around 80% over the next 5 years.
- Location isn't identified as a site earmarked for development in the Waverley Local Plan

Already sufficient housing:

- The Borough Council has achieved a Five Year Housing Supply of 5.80 years as reported on 1 April 2018
- Sufficient sites have already been identified to provide the required number of homes in the Farnham area.
- Badshot Lea already has 2 major housing developments, in progress, providing over 400 new homes
- FNP (Farnham Neighbourhood Plan) has identified more than sufficient sites to accommodate the Objectively Assessed Need (OAS) for housing for the period of the plan until 2032.

Impact on SPA:

- The site is within the SPA where development should be avoided if there are alternatives.

Impact on visual amenity, landscape character and strategic gap:

- Proposals are contrary to Policy FNP1
- The FNP should be given full weight and the application rejected.
- The proposals are in complete conflict with the guidelines for the Farnham Design Statement 2010.
- Proposal will further reduce strategic gap
- The proposals do not conserve or enhance the landscape and scenic beauty of the area. The proposals would have a detrimental impact on the area.

Highway safety:

- increase in traffic will be detrimental
- The entry/exit route for houses onto the road opposite the cemetery will have limited visibility and cause problems.
- The local roads, particularly the junction of the B3208 and the A325 are already heavily congested.
- The local roads, particularly the junction of the B3208 and the A325 are already heavily congested.
- The narrow roads already are crowded at peak times
- The access to this proposed development will be extremely difficult for traffic entering & leaving

Impact on infrastructure:

- No thought to schooling, transport, medical needs.

Pollution and environmental impacts:

- Excessive air pollution levels in Farnham.
- area of land floods several times each year and is the only remaining area of green land connecting Badshot Lea to Farnham

Other:

- The applicant has completely avoided any consultation or community involvement.
- Current use of site unauthorised
- The successful appeal on the adjacent site was based largely on the subjective views of the Inspector who conveniently ignored the main contents and facts contained within the FNP.

1 letter has been received expressing support for the following reasons:

- It is the natural completion of the pattern of development in this area to strong and defensible boundaries.

11. Planning Considerations

11.1 Principle of development

Policy SP1 of the Local Plan (Part 1) 2018 states that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development.

Policy SP2 sets out the spatial strategy for the borough up to 2032 and seeks to focus development at the four main settlements. The proposal is adjacent to the developed area of Farnham and therefore accords with the spatial strategy.

11.2 Planning history

The planning history is a material consideration.

Planning permission has been previously granted on the adjacent site for the construction of 43 dwellings and associated parking, with new access from Monkton Lane.

Allowed appeal scheme – WA/2016/2456:



The application on the adjacent site (to the west of Green Lane) was allowed on appeal on the 5th March 2018.

Given the close proximity and similarity in the physical and policy constraints, the findings of the Inspector in allowing this appeal are highly material in the assessment of the current application. The relevant sections of this report therefore refer to the findings of this appeal decision where relevant.

The test for Members is whether having regard to the appeal decision on the adjacent site, the current proposal is materially more harmful than the approved scheme and is acceptable in its own right.

11.3 Housing Land Supply

The Council published its 5 year housing land supply statement in September, with a base date of 1st April 2018. This document confirms that, with an additional buffer of 5%, the Council has 5.8 years' worth of housing supply. However, the Housing Delivery Test results were published in February 2019. As per the requirement of footnote 39 of the NPPF, a 20% buffer must now be applied. With a 20% buffer applied to the Council's published 5 Year housing land supply statement with a base date of 1st April 2018, the Council has 5.08 years' worth of housing land supply. Therefore, the Council can demonstrate the requirement of paragraph 73 of the NPPF.

Both the Folly Hill appeal and the Longdene House appeal Inspectors felt that the evidence before the inquiries did not point to five years' worth of housing supply. These decisions are material considerations. However, the Council maintains its view that it has five years' worth of housing land supply.

11.4 Housing mix

Policy AHN3 of the Local Plan 2018 (Part 1) sets out that proposals will be required to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA).

Farnham Neighbourhood Plan policy FNP15 supports the delivery of smaller 1 and 2 bed units on all sites where they would fit well with the character of the area and includes a target for all developments on sites larger than 0.2ha to include 1 or 2 bed dwellings.

The West Surrey SHMA 2015 provides the likely profile of household types required within Waverley as follows:

Unit Type	1 Bed	2 Bed	3 Bed	4+ Bed
Market	10%	30%	40%	20%
Affordable	40%	30%	25%	5%

The current application proposes the following mix of dwellings on site:

	Market Dwellings	Affordable dwellings
1-bed	4 (11%)	4 (27%)
2-bed	15 (43%)	6 (40%)
3-bed	12 (34%)	5 (33%)
4-bed	5 (14%)	0 (0%)
Total	35	15

The proposed mix of both affordable and market housing broadly aligns with the SHMA and officers raise no objection to this. The Council's Housing Enabling Officer has confirmed support of the proposed affordable housing mix.

11.5 Affordable Housing

Policy AHN1 of the Local Plan (Part 1) 2018 states that the Council will require a minimum provision of 30% affordable housing on all housing developments that meet required criteria.

The applicants propose the following tenure mix, which accords with the suggestions from the Council's Housing Enabling Officer:

	1-bed	2-bed	3-bed	TOTAL
Affordable homes for rent	4	4	2	10 (66%)
Shared ownership	0	2	3	5 (34%)
TOTAL	4 (26.6%)	6 (30%)	5 (33.3%)	15 (100%)

The proposed mix of affordable housing closely reflects the need demonstrated in the Strategic Housing Market Assessment for 70% rent and 30% affordable homeownership tenures, e.g. shared ownership.

Any recommendation for approval would be subject to the completion of an appropriate legal agreement to secure the provision of the affordable housing.

Subject to this, the proposed level of affordable housing is considered to be acceptable and to comply with Policy AHN1.

11.6 Impact on Countryside and Strategic Gap

The site is located within the Countryside beyond the Green Belt outside any defined settlement area. Policy RE1 of the Local Plan (Part 1) 2018 states that in this area the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.

The proposal also lies outside of the Built Up Area Boundary defined within the Farnham Neighbourhood Plan (2017). Policies FNP10 and FNP11 are also therefore applicable.

Policy FNP10 of the FNP sets out that outside of the built up area boundary, priority will be given to protecting the Countryside from inappropriate development and development will only be permitted if it enhances the landscape value of the Countryside. Policy FNP11 of the FNP states that development will not be permitted if it would result in increasing the coalescence between the Farnham settlements.

The application site lies within the Strategic Gap between Farnham and Aldershot as defined by Policy C4 of the Waverley Borough Local Plan (LP) that seeks to resist inappropriate development in this location. Policy FNP11 of the Farnham Neighbourhood Plan (FNP) seeks to prevent coalescence between a number of settlements, including between Farnham and Aldershot and between Badshot Lea and Weybourne.

In Waverley's adopted Local Plan Part 1: Strategic Policies and Sites (LPP1) it is established that the Farnham/Aldershot Strategic Gap designation would be retained with a more focussed policy and detailed review to be undertaken as part of Local Plan Part 2.

The Farnham / Aldershot Strategic Gap topic paper (April 2018) (supporting evidence to the Local Plan Part 1) finds that although the segment of the gap within which the application site sits separates Badshot Lea from other parts of Farnham, it does not form part of the gap between Farnham and Aldershot, nor is it within the broad area identified for the new Strategic Gap in LPP1. As such, the recommendation within the topic paper is that the segment of the gap within which the application site sits should not be included in the new Strategic Gap.

Draft Local Plan part 2 (preferred options document) 2018 sets out the proposed strategic gap, this accords with the broad locations set out in LPP1 and the recommendations of the topic paper, therefore, whilst only a preferred options document at this stage, it does set out the intention of the Draft Local Plan is to remove this parcel of land from the strategic gap.

In allowing the adjacent appeal scheme, the Inspector concluded “that it is the gap on the other side of Badshot Lea that is most important in retaining a Strategic Gap between the settlements, rather than that between Farnham and Badshot Lea in which the appeal site is located.”

Whilst only limited weight can be attached to draft local plan part 2, when considered alongside the topic paper, the broad direction plan set out in LPP1, together with the comments of the Appeal Inspector, this does quite clearly illustrate that the proposal would not conflict with the principle aims of retained Policy C4 of the Local Plan 2002.

Policy FNP11 of the Farnham Neighbourhood Plan, has a different focus to retained policy C4. This is not solely focused on the Farnham – Aldershot strategic gap, instead looks more broadly at the need to prevent coalescence of individual settlements within Farnham – of most relevance is Badshot Lea and Weybourne are separated by the railway line. The current proposal would result in a small infill between one of the Built Up Areas of Weybourne and Badshot Lea. However, given the proposal would be surrounded on 3 sides by development, the impact of the current proposal on the gap between Weybourne and Badshot Lea would be in officers view minimal. In assessing the impact on the gap between settlements, Policy FNP11 also requires account to be taken of visual and biodiversity characteristics.

In determining the adjacent appeal scheme, The Inspector concluded “development surrounds this site and adjacent small fields, such that they are essentially cut off from the surrounding countryside, with an urban context. For this reason, the appeal site does not make a material contribution to the landscape character of the area, and makes only a minor contribution to the Strategic Gap.”

In comparison with the appeal scheme, the current proposal would occupy the land between the railway line and the allowed appeal site. It would be surrounded by built form on 3 sides. The intrinsic beauty of the Countryside is strongly affected on the appeal site by the presence of the railway track, and the proximity to built up residential and industrial areas. This position will be exacerbated when the adjacent appeal scheme is constructed.

It is noted that as part of any subsequent reserved matters application, there would be an opportunity to secure landscape and biodiversity enhancements.

It is also notable that public views into the site are limited due to the low lying land level of the site. Given its proximity to existing built form on 3 sides, there would only be minimal adverse visual impacts from public vantage points.

Having regard to the above considerations, officers consider that a reason for refusal on the basis of harm to the Countryside and landscape character could not be sustained, and that the principle of the proposal would comply with Policies FNP10 and FNP11 of the Farnham Neighbourhood Plan (2017), Policy RE1 and RE3 of the Local Plan 2018 (Part 1) and Policy C4 of the Local Plan 2002.

11.7 Impact on visual amenity

Policy TD1 of the Local Plan 2018 (Part 1) requires development to be of high quality design and to be well related in size, scale and character to its surroundings. Retained Policies D1 and D4 of the Local Plan 2002 are attributed substantial and full weight respectively due to their level of consistency with the NPPF 2019.

At this outline application stage, with appearance, layout and landscaping (and scale) being reserved matters, there are limited details upon which to assess the impact on visual amenity.

It is noted that it would appear that the affordable homes are concentrated in the middle of the site, with a block at the south west of the site. This heavy concentration of affordable homes within a small area of the site does not lend itself to an integrated development where affordable homes are indistinguishable from the market housing. As layout and scale are yet to be determined, there are clear opportunities to secure alternative details with the affordable housing dispersed further. Whilst this is not currently the case, given that layout is a reserved matter, there would be an opportunity to resolve this as part of a subsequent reserved matters application.

The indicative details suggest that the proposed dwellings would be two storeys in height. This is considered to be consistent with neighbouring buildings, and the location of the application site.

It is noted that there are no trees of particular merit within the application site. It is also considered that opportunities exist for securing landscape enhancements.

The indicative layout submitted, demonstrates to officers that acceptable details could be secured at reserved matters stage, and that the proposed number of dwellings could be accommodated on site which would be acceptable in terms of design and visual impact.

11.8 Impact on residential amenity

Policy TD1 of the Local Plan 2018 (Part 1) seeks to ensure that new development is designed to create safe and attractive environments that meet the needs of users and incorporate the principles of sustainable development. Retained policies D1 and D4 of the Local Plan 2002 are given substantial and full weight respectively due to their consistency with the NPPF 2019.

Dwellings to the east of the site are located the other side of the railway line and overhead pylons. There would be a significant separation distance between the scheme and this area of housing (circa 50m).

To the north of the site, there are a number of farm buildings which separate the application site from Green Lane Farmhouse. There is a separation distance of 48m to this dwelling.

There are no residential dwellings to the south that are within close proximity of the site – immediately south of the site is Badshot Lea Road and a cemetery.

There is an extant permission for housing on land to the west (WA/2016/2456). It is therefore material to consider the potential impacts on future occupants of that development. The nearest permitted dwellings are shown to be 9.8m from the site boundary, with the side elevations facing towards the application site. The two sites would be separated by a road (Green Lane). The indicative layout shows landscaping along the western boundary of the application site, and an internal road inside of that. These intervening features are considered sufficient to provide separation between the neighbouring scheme and the application site.

It is noted that there would be temporary, transient impacts on neighbouring dwellings as a result of the construction process (noise and disturbance from construction vehicles and operations). These impacts, as noted, would be transient and could be appropriately managed through management plans.

Having regard to the above considerations, officers are satisfied that details could be secured as part of a reserved matters application, that would be acceptable in terms of residential amenity.

11.9 Standard of accommodation and amenity space for future occupants

Policy TD1 of the Local Plan (Part 1) 2018 seeks to maximise the opportunity to improve the quality of life, health and well-being of current and future residents through the provision of appropriate private, communal and public amenity space, appropriate internal space standards for new dwellings, on site playspace provision, appropriate facilities for the storage of waste and private clothes drying facilities.

Paragraph 180 of the NPPF (2018) states that development should be appropriate for its location and seek to mitigate and reduce any potential adverse impacts resulting from noise.

The Government Technical Housing standards – nationally described space standards (2015) requires dwellings to meet certain internal space standards in order to ensure that an appropriate internal standard of accommodation has been provided for future occupiers. Until the Council has a Local Plan Policy in respect of these standards, they should only be given limited weight and used as guidance to inform the decision on this proposal.

Unit type	Proposed floorspace (minimum)	Technical Space Standard
Affordable units		
1 bed flats	54sqm	39sqm
2 bed houses	79sqm	70sqm
3 bed houses	93sqm	84sqm
Open market units		
1 bed flats	54sqm	39sqm
2 bed houses	81sqm	70sqm
3 bed houses	93sqm	84sqm
4 bed houses	148sqm	97sqm

The above table reflects the smallest of the indicative floorspace figures given for each dwelling type. This table shows that the scheme is capable of providing sufficient internal floorspace within the dwellings, such to accord with the technical space standards. In the absence of floor plans, it is not possible to assess bedroom sizes at this stage.

The application site is located in close proximity to the Farnham Sewage Treatment works which are located to the south west. The application proposes to introduce new residential dwellings, which could be subject to odour from the treatment works.

In allowing the appeal on the adjacent site, the Inspector raised no objection to the proposal on odour grounds. The Council's Environmental Health Officers have reviewed the current proposal and raised no objection in respect of odour, noting that whilst historic complaints regarding odour generated by the sewage treatment works on Monkton Lane have been received, Farnham Sewage Works have carried out extensive works and moved the sludge treatment works of the site out of the area.

In terms of light and outlook for the proposed dwellings, the indicative layout would accord with the guidance in the residential extensions SPD, with a minimum of 18m between rear elevations provided. Officers are satisfied that an appropriate scheme could be secured at reserved matters stage such to provide good light and outlook for future occupants.

The indicative details indicate that each proposed house would be provided with a private garden. In the case of the proposed flats, an appropriate level of communal space is shown to the rear.

The indicative layout includes a Local Area of Play, but does not include a Local Equipped Area of Play which is recommended for schemes of 10 or more dwellings in line with Local Plan Policy LRC1. This would be sought at reserved matters stage should permission be granted.

Having regard to the above considerations, officers are satisfied that appropriate details could be secured at reserved matters stage such to provide a good standard of amenity for future occupants.

11.10 Highway safety and parking considerations

Policy ST1 of the Local Plan 2018 (Part 1) states that development schemes should be located where they are accessible by forms of travel other than by private car; should make necessary contributions to the improvement of existing and provision of new transport schemes and include measures to encourage non-car use. Development proposals should be consistent with the Surrey Local Transport Plan and objectives and actions within the Air Quality Action Plan. Provision for car parking should be incorporated into proposals and new and improved means of public access should be encouraged.

The Council has adopted a Parking Guidelines Document. Policy ST1 of the Local Plan (Part 1) 2018 states that development schemes should have appropriate provision for car parking. Development proposals should comply with the appropriate guidance as set out within these documents.

The County Highway Authority is satisfied that the proposed highway improvement works, including the provision of tactile paving and a pedestrian refuge island on Badshot Lea Road, would provide residents/visitors a safe route to/from the site. The access/egress to/from the site would provide adequate visibility splays at the junction where the site access meets Badshot Lea Road. Vegetation should be regularly maintained to ensure maximum visibility splays are achievable at all times.

The County Highway Authority has undertaken an assessment in terms of the likely net additional traffic generation, access arrangements and parking provision and is satisfied that the application would not have a severe impact on the safety and operation of the adjoining public highway, subject to conditions.

	WBC Parking Guidelines per dwelling (2013)	Total
1 bed flats (x 8)	1 (total 8)	8
2 bed houses (x 21)	2 (total 42)	42
3 bed houses (x 16)	2.5 (total 40)	40
4 bed houses (x 5)	2.5 (total 12.5)	12.5
Total requirement		102.5

The indicative site layout plan shows a total of 102 car parking spaces, this is 1 space under the Council's guidelines, however, given the very minor discrepancy no objection is raised at this stage and the indicative layout is considered sufficient to demonstrate that appropriate parking provision could be included within the scheme.

The proposal would therefore comply with Policy ST1 of the Local Plan 2018 (Part 1).

11.11 Archaeological Considerations

Policy HE15 of the Local Plan 2002 requires that appropriate desk based or field surveys should be submitted with an application and appropriate measures taken to ensure any important remains are preserved.

The archaeological Written Scheme and subsequent evaluation carried out by Archaeology South East in response to the condition placed on the 2015 consent has demonstrated that the site has a negligible potential to contain significant archaeological remains and the County Archaeological Officer has confirmed that there is no need for any further archaeological work on the site and so no requirement for any conditions relating to archaeology.

The proposal would therefore comply with retained Policy HE15 of Local Plan 2002.

11.12 Flood risk and drainage considerations

Policy CC4 of the Local Plan (Part 1) 2018 states that in order to reduce the overall and local risk of flooding, development must be located, designed and laid out to ensure that it is safe; that the risk from flooding is minimised whilst not increasing flood risk elsewhere and that residual risks are safely managed. In those locations identified as being at risk of flooding, planning permission will only be granted where it can be demonstrated that it is located in the lowest appropriate flood risk location, it would not constrain the natural function of the flood plain and where sequential and exception tests have been undertaken and passed. Sustainable drainage systems (SuDS) will be required on major development proposals.

The application relates to a major development and the site area exceeds 1 ha. Therefore, a site specific Flood Risk Assessment (FRA) is required and one has been submitted with the application.

The nearest main river, The Wey, is located approximately 1 km south of the site. A small watercourse which is a tributary of the River Wey is located approximately 0.1km west of the site. The application site falls wholly within Flood Zone 1.

The FRA outlines that the site is not susceptible to either tidal or fluvial flooding and that no risk has been identified from other sources, such as overland flow, ground water, sewers and artificial sources

The proposed foul drainage solution involves pumping the foul drainage and connecting into the existing foul network along the B3208. The proposed location of the pumping station is to the south of the site near the site entrance.

Thames Water has raised no objection in respect of existing waste water infrastructure to accommodate the needs of this application.

The proposal includes a Sustainable Drainage System that includes:

- Permeable paving for both attenuation and infiltration within the areas designated as driveways and parking areas Individual house soakaways are proposed for each of the dwellings, positioned within the rear gardens and maintaining a 5m distance from the edge of any building or structure.

- A large dry swale is proposed along the western boundary of the site and this will receive, attenuate and infiltrate all the surface water generated by the spine road, as well as the surface water generated by the southern section of the site

The LLFA has considered these proposals and has confirmed that the drainage proposals satisfy the requirements of the NPPF and NPPG. It has further recommended that should permission be granted, then suitable conditions should be imposed to ensure that the SuDS scheme is properly implemented and maintained throughout the lifetime of the development.

Having regard to the submitted Flood Risk Assessment, together with the comments and recommended conditions from the LLFA, it is considered that the proposal has adequately addressed flood risk, surface water and ground water flooding risk in accordance with the NPPF 2012.

11.13 Effect on the SPAs

The site is located within the 5km of the Thames Basin Heathland Special Protection Area (SPA). The proposal would result in an increase in people (permanently) on the site.

The three tests as set out in Regulation 122(2) require S106 agreements to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

In order for the development to be acceptable in planning terms, to comply with the Conservation of Habitats and Species Regulations 2017 and to avoid a likely significant effect upon the Thames Basin Heaths SPA a S106 agreement is required as part of any subsequent planning approval to secure a financial contribution of £140,343 (£108,034 towards a SANG and £32,309 towards SAMM), in line with the Waverley Borough Council Thames Basin Heaths Special Protection Area (TBH SPA) Avoidance Strategy (July 2016). This figure is based on the proposal being for 50 dwellings.

The pooling of contributions towards SANG, which is for the ongoing maintenance and enhancement of the SANG at Farnham Park, rather than the provision of new SANG, is considered not to be infrastructure and does not therefore need to comply with CIL Regulation 123.

On the basis of the proposed mitigation, an Appropriate Assessment has been completed for this application. This has been reviewed by Natural England who

has raised no objection subject to the relevant avoidance and mitigation measures being secured.

Having regard to the completed unilateral undertaking, the effect upon the SPA would be mitigated in accordance with Policies NE1 and NE3 of the Local Plan 2018 (Part 1), Policy FNP12 of the Farnham Neighbourhood Plan 2017 and the adopted Avoidance Strategy.

11.14 Biodiversity and compliance with Habitat Regulations 2017

The NPPF requires that when determining planning application, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for then planning permission should be refused.

In addition, Circular 06/2005 states 'It is essential that the presence or otherwise of protected species and the extent that they may be affected by the proposed development, is established before planning permission is granted.'

Natural England has commented on the application and raised no objection in respect of protected species, priority habitats and species or ancient woodland and veteran trees.

The application is accompanied by a Preliminary Ecological Assessment based on surveys undertaken in 2018. The report identifies low potential for protected species on site, however, does recommend retention of hedgerows and vegetation along the site boundaries in order to provide foraging / commuting for bats. Precautionary measures are recommended.

Should permission be granted, a condition would be imposed to require the development to be undertaken in accordance with the recommended mitigation measures set out in the submitted report. Subject to this, no objection is raised in respect of biodiversity.

11.15 Parish/Town Council and or Third Party Representations

The objections from third parties and from Farnham Town Council have been carefully considered in the assessment of this application. The majority of comments made are addressed within the above report, however, in addition the following advice is offered:

- The appeal decision on the adjacent site is a highly material consideration
- The impact on the road network has been carefully assessed by the County Highway Authority who has found the proposal acceptable subject to conditions
- The proposal would be CIL liable, and CIL monies collected would be spent on infrastructure projects identified within the Council's CIL charging schedule

11.16 Conclusion / planning balance

Outline permission is sought for the erection of 50 dwellings, with detailed permission sought in respect of access only.

The benefits of the scheme comprise the provision of both market and affordable dwellings in close proximity to one of the four main settlements. The proposed development could be undertaken without significant material harm in visual terms.

No adverse impacts to the proposal are identified.

The planning balance assessment concludes that there are no adverse impacts that would outweigh the benefits. As such, planning permission is recommended for approval.

12. **Recommendation A:**

That, subject to the completion of a legal agreement to secure contributions towards Farnham Park SANG, 30% on site affordable housing and maintenance of the SuDS, open space and play areas by 25/03/2020 and subject to conditions, permission be GRANTED:

1. Condition

Details of the appearance, landscaping, layout, and scale (hereinafter called "the reserved matters") shall be submitted to the Local Planning Authority within three years from the date of this permission. Approval of all reserved matters shall be obtained by the Local Planning Authority in writing before any development takes place and the development shall be carried out as approved.

Reason

To enable the Local Planning Authority to control the development in details and to comply with Section 92 of the Town and County Planning Act 1990 (as amended).

2. Condition

The development to which this permission relates must be begun not later than the expiration of two years from the final approval of reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason

To enable the Local Planning Authority to control the development in details and to comply with Section 92 of the Town and County Planning Act 1990 (as amended).

3. Condition

The plan numbers to which this permission relates are TR 0001 P1, TR 0002 P2 and 2018014 Rev A.

The development shall be carried out in accordance with the approved plans. No material variation from these plans shall take place unless otherwise first agreed in writing with the Local Planning Authority.

Reason

In order that the development hereby permitted shall be fully implemented in complete accordance with the approved plans and to accord with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

4. Condition

No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation which has been submitted by the applicant and approved by the Planning Authority.

Reason

The development proposed covers a large surface area and it is considered likely that it will affect currently unknown archaeological information. It is important that the site is surveyed and work is carried out as necessary in order to preserve as a record any such information before it is destroyed by the development in accordance with retained Policy HE15 of the Waverley Borough Local Plan 2002. This is a pre commencement condition because the details

cannot be reasonably discharged after permission has been implemented. The matter goes to the heart of the planning permission.

5. Condition

No development shall take place, including any works of demolition, until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for:

- a. An indicative programme for carrying out of the works
- b. The arrangements for public consultation and liaison during the construction works
- c. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s)
- d. Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination
- e. The parking of vehicles of site operatives and visitors
- f. Loading and unloading of plant and materials
- g. storage of plant and materials used in constructing the development
- h. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- i. wheel washing facilities
- j. measures to control the emission of dust and dirt during construction
- k. a scheme for recycling/disposing of waste resulting from demolition and construction works

Reason

To minimise the environmental impacts of the development and to avoid any significant adverse noise impacts resulting from the adjacent road and railway, such to ensure an appropriate standard of accommodation for future residents in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

6. Condition

Those dwellings, which are sited within 60 metres of the railway track, must be subject to an assessment of the impact of the vibration from the railway. This assessment should include details of recommended remedial measures should vibration levels be found to be unacceptable. This assessment must be supplied to and approved in writing by the local planning authority prior to commencement of development. The assessment shall be carried out in accordance with the method and rating system as detailed in British Standard BS 6472-1: 2008, and raw data gathered shall be presented as an appendix to such an assessment.

Reason

To minimise the environmental impacts of the development and to avoid any significant adverse noise impacts resulting from the adjacent road and railway, such to ensure an appropriate standard of accommodation for future residents in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002.

7. Condition

The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) The results of groundwater monitoring completed over winter to ensure 1meter can be provided between the base of the proposed soakaways and groundwater.
- b) Evidence that the proposed solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep, during all stages of the development (Pre, Post and during), associated storage volumes shall be provided using an infiltration based strategy (as per the SuDS pro-forma or otherwise as agreed by the LPA).
- c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- d) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.

Reason:

To ensure an acceptable Sustainable Drainage System and to comply with retained Policy D1 of the Waverley Borough Local Plan 2002, Policy CC4 of the Local Plan (Part 1) 2018 and the advice contained within the NPPF, NPPG and Non-Statutory Technical Standards for SuDS.

8. Condition

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls).

Reason:

To ensure an acceptable Sustainable Drainage System and to comply with retained Policy D1 of the Waverley Borough Local Plan 2002, Policy CC4 of the Local Plan (Part 1) 2018 and the advice contained within the NPPF, NPPG and Non-Statutory Technical Standards for SuDS.

9. Condition

Prior to the occupation of the dwellings, details shall be submitted to and be approved in writing by the Local Planning Authority to confirm that the dwellings have been completed to meet the requirement of 110 litres of water per person per day.

Reason

To ensure sustainable construction and design in accordance with Policy CC2 of the Waverley Local Plan Part 1 (2018)

10. Condition

The mitigation recommendations set out in chapter 5 of the Preliminary Ecological Assessment dated 20/04/2018 and prepared by Plan Ecology Ltd shall be carried out and adhered to in full.

Reason

To ensure that protected species under Schedules 1 and 5 of the Wildlife and Countryside Act 1981 and their roosts/setts are not endangered by the development in accordance with Policy NE1 of the Local Plan 2018 (Part 1)

11. Condition

The development hereby approved shall not be first occupied unless and until the approved highway improvement works have been constructed in accordance with the approved plans, Drawing No. 0001 P2, and thereafter shall be permanently retained and maintained.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

12. Condition

No part of the development shall be commenced unless and until the proposed vehicular access to Badshot Lea Road hereby approved has been constructed and provided with visibility zones in accordance with the approved plans, Drawing No. 0001 P2, and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1m high.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

13. Condition

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

14. Condition

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) loading and unloading of plant and materials
- (b) storage of plant and materials
- (c) programme of works (including measures for traffic management)
- (d) provision of boundary hoarding behind any visibility zones
- (e) HGV deliveries and hours of operation
- (f) vehicle routing
- (g) measures to prevent the deposit of materials on the highway

- (h) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
 - (i) on-site turning for construction vehicles
- has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

15. Condition

The development hereby approved shall not be first occupied unless and until facilities for the secure, covered parking of bicycles within the development site, have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

16. Condition

The development hereby approved shall not be occupied unless and until each of the proposed dwellings are provided with a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

17. Condition

Prior to the occupation of the development a Travel Plan shall be submitted for the written approval of the Local Planning Authority in accordance with the

sustainable development aims and objectives of the National Planning Policy Framework, Surrey County Council's "Travel Plans Good Practice Guide". The approved Travel Plan shall be implemented and thereafter maintained and developed to the satisfaction of the Local Planning Authority.

Reason

In order that the development should not prejudice highway safety nor cause inconvenience to other highway users such to accord with Policy ST1 of Waverley Borough Council's Local Plan 2018 and the National Planning Policy Framework 2019.

18. Condition

Any reserved matters application relating to details of layout, appearance or landscaping, shall include details of a Local Area of Play and a Local Equipped Area of Play to be incorporated within the scheme. The approved play areas shall be constructed and implemented in accordance with the approved details prior to the first occupation of the dwelling.

Reason

In order to ensure appropriate provision is made for children's play in accordance with Policy LRC1 of Local Plan Part 1 2018.

19. Condition

Construction works pursuant to this permission shall not take place other than between the hours 08:00am and 18.00pm Monday to Fridays and between 08.00 and 13.00pm on Saturdays. No works shall take place on Sundays or Bank Holidays.

Reason

In the interest of the amenities of the area, in accordance with Policy TD1 of the Local Plan Part 1 2018 and retained Policies D1 and D4 of the Waverley Borough Local Plan 2002.

Informatives

1. "IMPORTANT" This planning permission contains certain conditions precedent that state 'before development commences' or 'prior to commencement of any development' (or similar). As a result these must be discharged prior to ANY development activity taking place on site. Commencement of development without having complied with these conditions will make any development unauthorised and possibly subject to enforcement action such as a Stop Notice. If the conditions have not been subsequently satisfactorily discharged within the time allowed to implement the permission then the development will remain unauthorised.

2. There is a fee for requests to discharge a condition on a planning consent. The fee payable is £116.00 or a reduced rate of £34.00 for household applications. The fee is charged per written request not per condition to be discharged. A Conditions Discharge form is available and can be downloaded from our web site.

Please note that the fee is refundable if the Local Planning Authority concerned has failed to discharge the condition by 12 weeks after receipt of the required information.

3. This permission creates one or more new units which will require a correct postal address. Please contact the Street Naming & Numbering Officer at Waverley Borough Council, The Burys, Godalming, Surrey GU7 1HR, telephone 01483 523029 or e-mail waverley.snn@waverley.gov.uk. For further information please see the Guide to Street and Property Naming on Waverley's website.
4. The Developer / Management must inform Waverley Borough Council Environmental Services Dep't at least four weeks prior to the proposed date of initial occupation, in order that final arrangements for refuse and recycling collections can be made.
5. The applicant is reminded that it is an offence to disturb protected species under the Wildlife and Countryside Act 1981. Should a protected species be found during the course of the works, the applicant should stop work and contact Natural England for further advice on 0845 600 3078.
6. As part of any subsequent reserved matters scheme, the applicant should ensure that:
 - gardens are enclosed with a close-boarded fence to provide screening attenuation
 - flats do not have balconies that directly face the road; any balconies that are perpendicular to the road should have solid balustrades to provide screening attenuation
 - the acoustic performance of windows and ventilators to habitable rooms may require upgrading
 - Habitable room windows that directly face the road should be avoided; windows should be perpendicular to the road.
7. The applicant should take all relevant precautions to minimise the potential for disturbance to neighbouring residents during the demolition and/or construction phases of the development.

8. The applicant should follow the guidance provided in the Construction Code of Practice for Small Developments in Waverley. The granting of this planning permission does not indemnify against statutory nuisance action being taken should substantiated noise or dust complaints be received. For further information please contact the Environmental Health Service on 01483 523393.
9. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.
10. The development approved will be encroaching close to Farnham STW. Thames Water operate its sewage assets to best practice, but given the nature of the treatment process there maybe potential for sensitive receptors to be exposed to offsite odour exposure from time to time.
11. If proposed site works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on our website.
12. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards.
13. COMMUNITY INFRASTRUCTURE LEVY (CIL) -The development hereby permitted is CIL liable. 'CIL Form 6: Commencement Notice' must be received by the Council prior to the commencement of development. Commencement of development is defined in Regulation 14 of the CIL Regulations 2010 (as amended). Failure to adhere to the CIL Regulations and commencing work without notifying the Council could forfeit any rights you have to exemptions, payment by instalments and you may also incur surcharges. For further information see our webpages (www.waverley.gov.uk/CIL) or contact CIL@waverley.gov.uk

Recommendation B

That, in the event that the requirements of recommendation A are not met, that permission be refused for the following reasons:

1. Reason

In the absence of an appropriate legal agreement the proposals (in combination with other projects) would have a likely significant effect on the integrity of the Thames Basin Heath Special Protection Area (SPA). Accordingly, since the planning authority is not satisfied that Regulation 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) (The Habitats Regulations) applies in this case, it must refuse permission in accordance with Regulation 61(5) of the Habitats Regulations and Article 6(3) of Directive 92/43/EEC. The proposal conflicts with Policy NE1 and NE3 of the Local Plan (Part 1) 2018, Policies FNP12 and FNP13 of the Farnham Neighbourhood Plan (2017) and the National Planning Policy Framework 2018.

2. Reason

The applicant has failed to enter into an appropriate legal agreement to secure the provision of on site affordable housing, such to meet Waverley Borough Council's housing need. The proposal would therefore fail to create a sustainable, inclusive and mixed community contrary to Policy AHN1 of the Local Plan Part 1 (2018) and paragraph 64 of the NPPF 2019.