RCC TOWN PLANNING CONSULTANCY



Site: 203 Bulford Road, Durrington, Wilts, SP4 8HB

Proposal: Demolition of Existing and Construction of Replacement Dwelling and Garage

On behalf of: Mr and Mrs Bawden

Date of Issue: November 2023

RCC TOWN PLANNING CONSULTANCY

PLANNING, DESIGN AND ACCESS STATEMENT (inclusive of heritage statement)

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CONTENTS PAGE

Introduction	1.0
Site Context	2.0
Development Proposal	3,0
Planning History	4.0
Planning Policy	5.0
Planning Assessment (inclusive of heritage statement)	6.0
Conclusions	7.0

1.0 INTRODUCTION

1.1 This planning, design and access statement (inclusive of heritage statement) has been prepared on behalf of the applicants, Mr & Mrs Bawden, to support their submission of a full planning application for the 'Demolition of Existing and Construction of a Replacement Dwelling and Garage' at 203 Bulford Road, Durrington, Wiltshire, SP4 8HB.

1.2 This statement is submitted in accordance with the requirements of Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The statement will examine how the proposed development relates to the site and its context and provide explanation and justification for the scheme, having regard to the national and local planning policy context.

2.0 SITE CONTEXT

2.1 The application site relates to 203 Bulford Road, Durrington, comprising a detached bungalow, associated detached garage and its residential curtilage. 203 Bulford Road is located within the built-up area of the settlement of Durrington, a village found to the east of the main A345 Salisbury to Marlborough Road, approximately 2 miles north of Amesbury and approximately 10 miles northeast of the city of Salisbury, in south Wiltshire.

2.2 Alongside the settlements of Amesbury and Bulford, the village of Durrington is defined as a 'market town' in the Wiltshire Core Strategy, which are defined as those settlements considered able to support sustainable patterns of living due to existing levels of facilities, services and employment opportunities.

2.3 The application site extends to approximately 0.06ha and occupies a broadly rectangular shape, albeit slightly tapered to its southwestern aspect. It comprises an existing detached bungalow of Woolaway construction with cream rendered panel and concrete tile clad exteriors and a UPVC rear conservatory addition. A detached single storey flat roofed garage is located to the south of the bungalow, set further back into the plot. Neither the dwelling nor garage are of any architectural merit.



Figure 1: Google aerial photograph showing application site and its surroundings

2.4 The existing bungalow at 203 Bulford Road is located close to the front of the site, with its ridge line orientated at 90 degrees to Bulford Road, from which it is

clearly visible. The front of the site is completely open, with a gravelled area immediately to the front of the dwelling, adjacent to a tarmaced singular vehicle access point, serving the site from Bulford Road. The tarmaced driveway is gated beyond the front building line of the dwelling, with the driveway extending into the site, leading to a detached single storey garage which is located to the rear of the bungalow, set into rising land beyond. A further small domestic shed is found toward the rear of the site and is shown for retention on the plans.

2.5 The entrance to the application site and existing developed area are relatively flat and level with the road, however the site banks away steeply to the rear (southwestern) and side (southeastern) boundaries, with some low-quality vegetation along the banks and a retaining wall running along the base of the southwestern bank.



Photograph 1: 203 Bulford Road – view taken at front boundary of site looking north west.

2.6 The application site is located within the built envelope of Durrington and just within Durrington Conservation Area. Development within the site vicinity is predominately residential in nature, with dwellings displaying a broad mix of architectural styles, ages and forms. If any similarity is to be found, it is that dwellings are laid out in a broadly linear settlement pattern either side of the roads and are mainly detached in nature.

2.7 The site is bordered to the northwest by Camellia, a detached thatched cottage (unlisted) and to the southeast by 201 Bulford Road, a detached dwelling set at a higher level in relation to the application site, the difference in land levels limiting visual connection between the two. On the opposite side of Bulford Road at the junction with The Ham lies further residential development in the form of detached bungalows, including no's 7 and 8 The Ham, two detached chalet bungalows built some ten years ago as infill development.

2.8 Immediately behind the ribbon residential development along the northern side of Church Street and The Ham runs the River Avon, and beyond this water meadows and open countryside. The application site falls within the Hampshire River Avon Catchment Area.

2.9 Aside those designations already cited within this statement, the application site is not covered by any other heritage, landscape or arboricultural designations or restrictions and with respect of flooding, the land falls within Flood Zone 1 (lowest risk).

2.10 Looking at the wider site context, 7 The Ham is subject to a tree preservation order (TPO), however due to the separation distance to the application site and intervening main road, arboricultural interests would not stand to be adversely affected by the proposed development.

3.0 DEVELOPMENT PROPOSAL

3.1 The existing dwelling at 203 Bulford Road is of a poor standard of construction compared to modern day comparisons and for reasons of viability, upgrades to the existing buildings are not being pursued. The buildings on the site are of no architectural merit and do not positively contribute to the surroundings. As such, this application proposes the demolition of the existing buildings and their replacement with a detached one and a half storey 4-bedroom family home and associated detached garage with annexe accommodation above.

3.2 The new site layout is proposed to closely follow the existing arrangement, with the footprint of the replacement dwelling closely reflecting that of the structure it will replace. The front building line of the replacement dwelling would be set back marginally further into the site than existing, thereby facilitating the provision of two off street parking spaces immediately to the front of the dwelling, located parallel to the road. Sufficient space for at least a further third parking space is achieved on the gated driveway running perpendicular to the road, as per the existing site arrangement. Secure covered parking provision is also achieved within the replacement garage building. The new dwelling will be orientated with its principal elevation facing the road (northeast), designed as such to improve the visual relationship between the dwelling and the street scene and offering improved security.

3.3 The external material palette of the replacement dwelling has been proposed with a combination of brick and brick and flint elevations under a plain tiled roof. A detached one and a half storey garage building would replace the existing garage structure, located broadly on the same footprint as that it replaces but extending slightly further back into the plot than the existing structure. The replacement garage would be constructed of brick, under a plain tiled roof with a fibre cement clad dormer on the southeast facing elevation. The garage would provide ancillary accommodation in the roof space, accessed via an external stair and proposed for use in connection with the principal dwelling.

4.0 PLANNING HISTORY

4.1 Wiltshire Council online records reveal only one previous application at the site, an aged application, recorded in the table below:

Ref. No	Description	Status
S/1986/0733	Construction of Extension to Existing Bungalow	Approved 17/06/86

5.0 PLANNING POLICY

5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) states that in dealing with an application for planning permission, the local planning authority (LPA) shall have regard to the provisions of the development plan, so as far as material to the application, any local finance considerations, so far as material to the application and any other material considerations.

5.2 Under the Planning (Listed Building and Conservation Areas) Act 1990 special regard must be given to the desirability of preserving the character and appearance of the conservation area (S72).

5.3 For the purposes of this application, the development plan comprises the Wiltshire Core Strategy (WCS) adopted Jan 2015 and covering the period 2011-2026 and retained saved policies of the Salisbury District Local Plan adopted 2011. Government guidance is provided within the revised National Planning Policy Framework (NPPF) published September 2023.

5.4 Relevant supplementary planning guidance is found within the Wiltshire Local Transport Plan 2011-2026 Car Parking Strategy (2011) which contains minimum residential parking standards and Durrington Conservation Area Appraisal and Management Plan (January 2009).

5.5 Durrington has yet to be designated within an area for the purposes of neighbourhood planning.

5.6 Any key policies of relevance to the application within these plans are set out in the associated tables below:

WILTSHIRE CORE STRATEGY

Policy	Title
CP1	Settlement Strategy
CP2	Delivery Strategy
CP4	Spatial Strategy for Amesbury Community Area
CP50	Biodiversity
CP51	Landscape
CP57	Ensuring High Quality Design and Place Shaping
CP58	Ensuring the Conservation of the Historic Environment
CP60	Sustainable Transport
CP61	Transport and Development

CP67	Flood Risk
CP69	Protection of the River Avon SAC

NATIONAL PLANNING POLICY FRAMEWORK

Chapter	Title
2	Achieving sustainable development
5	Delivering a sufficient supply of homes
9	Promoting sustainable transport
11	Making effective use of land
12	Achieving well-designed places
15	Conserving and enhancing the natural environment
16	Conserving and enhancing the historic environment

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6.0 PLANNING ASSESSMENT

6.1 The key issues associated with this proposal can be summarised as:

- The principle of the replacement of the existing buildings with a new dwelling and detached garage
- Impact on heritage assets
- Impact on biodiversity
- Residential amenity, and
- Highway safety

6.2 These will be considered in turn below.

Principle of Development

6.3 The application site lies within the defined settlement boundary for Durrington, designated as a market town within the Wiltshire Core Strategy (WCS) and where the principle of new housing development is acceptable in accordance with the spatial vision and underlying principles for the delivery of development within the county, set out at CP1 and CP2 of the WCS.

6.4 CP2 of the WCS states that '*within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Principal Settlements, Market Towns, Local Service Centres and Large Villages*'.

6.5 The spatial strategy for the Amesbury Community Area set out at CP4 of the WCS further directs that development should be focussed within the settlement boundaries, in accordance with the development strategy set out at CP1.

6.6 Aside the spatial and delivery policies set out at CP1 and CP2 the proposed replacement dwelling would fall to be considered against design and landscape considerations set out at CP51 and CP57 of the WCS, alongside any other site-specific considerations, which in this instance includes heritage implications with heritage policy requirements set out at CP58. In addition, retained saved policies of the former Salisbury District Local Plans are applicable, in this instance, none are considered of specific relevance to this proposal.

6.7 Turning to design and landscape considerations, core policies 51 and 57 of the WCS require development to preserve, conserve and where possible enhance landscape character, requiring a high standard of design which is complimentary to the locality and responds to local context. The application site is located within the built envelope of Durrington and within a residential context, with development following a broadly linear pattern either side of the main road. Beyond this ribbon development, to the north runs the River Avon, with water meadows beyond. The local site context displays no clear uniformity in building character or design and contains a mix of mainly detached residential dwellings, of varying ages and styles to include singe storey bungalows, chalet bungalows, one and a half and two storey dwellings.

6.8 The existing bungalow residing on the site is a mid 20th century dwelling of Woolaway construction. It is of no special architectural value or merit, neither is it of any heritage value or historical significance. It is considered that the site can accommodate the proposed replacement scheme without giving rise to any material harm. This is in part due to the scale of the development, which largely follows the existing site arrangement in terms of footprint and building lines and proposes only a limited increase in height of the replacement buildings, with the first-floor accommodation achieved within the respective roof spaces.

6.9 Furthermore, any increase visual presence resulting from the scheme would be balanced by the architectural design of the replacement buildings, which offer clear visual improvements to the appearance of the site. Design cues (such as use of sash windows, brick arch lintels and brick and flint panelling) have been taken from existing traditional dwellings nearby the site, therefore the development can be regarded to respond to local context, in accordance with CP51 and CP57 of the WCS.

6.10 It is relevant to note that newly constructed homes are not uncommon within the immediate local area, such as can be found to the northeast of the site at 7 and 8 The Ham. These properties were approved in 2010 and have some direct similarities to the replacement dwelling proposed at 203 Bulford Road, which also relates to a 4 bedroom one and a half storey dwelling with detached garage.

6.11 Whilst the principle of this development accords with development plan policy, also of significance to this proposal is national planning policy contained within the NPPF which requires LPAs to identify a five-year supply of specific deliverable sites to meet housing needs, with an appropriate buffer. Wiltshire Council confirmed their latest position through the Housing Land Supply Update published in May 2023. This confirmed that the Council can demonstrate only 4.6 years of housing supply, equating to a shortfall of approximately 850 homes. As such, development plan policies concerning housing delivery, such as those within the spatial vision at CP1 and CP2 of the WCS are considered out of date and applications for housing development should be considered in line with paragraph 11 of the NPPF. This states at subsection d) that where policies are considered out of date, '*permission will be granted unless the application of policies in the framework that protect areas or assets of particular importance provides clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole*'.

6.12 Focussing now on the contents of subsection d) paragraph 11 of the NPPF, the application site is within Durrington Conservation Area, a designated heritage asset, cited as '*an area of particular importance*' by footnote 7 to paragraph 11 of the NPPF. A separate assessment of any impacts of the proposal on heritage assets is recorded later within this statement, concluding that the development will not adversely affect the surrounding conservation area and

hence complies with heritage policies, which therefore provide no clear reason for refusing the development.

6.13 Section d)ii) of paragraph 11 requires an assessment to be made of the likely impacts and benefits of the proposal, measured against the presumption of sustainable development which runs at the heart of the framework as a whole. It advises that permission should be granted unless the adverse impacts of doing so would '*significantly and demonstrably outweigh the benefits'*.

6.14 As set out at Chapter 2 of the NPPF, in order to achieve sustainable development the planning system has three overarching objectives, economic, social and environmental, which it advises should be pursued in mutually supportive ways.

6.15 This application would have a positive impact on economic development, through the development of the site itself, with associated small-scale employment and economic benefits through the build phase.

6.16 Another key pursuit of the NPPF is to create strong, vibrant, healthy communities. It is our client's intention to replace their existing substandard dwelling and rebuild with a high quality home for their family, which should last for generations, adding to the vitality of the settlement.

6.17 With regard to environmental impacts, it is noted that aside the Conservation Area designation and location within the Hampshire River Avon Catchment Area, the application site is not covered by any other designations. It is not of high ecological importance, nor is it located within an area prone to flood risk. The site is sustainably located within a market town and is well related to existing development. Moreover, the proposal offers the opportunity for the existing defective dwelling to be replaced with a new home, built to incorporate the latest environmental credentials, thereby minimising environmental impact and raising design standards in the area.

6.18 The Council's current inability to demonstrate a deliverable five-year housing land supply renders its housing policies out of date. As such the proposal falls instead to be assessed against paragraph 11 of the NPPF and the presumption in favour of sustainable development. It is clear that when taken holistically, the proposal offers many economic, social and environmental benefits, and that any adverse impacts from approving this application, relating to the one for one replacement of an existing dwelling within a defined settlement boundary of a market town could not be regarded to '*significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole'* and therefore as outlined at paragraph 11 d) of the NPPF, the principle of this application should be supported.

Impact on Heritage Assets (Heritage Statement)

6.19 The application site is located just inside the designated Conservation Area for Durrington, a designated heritage asset. In accordance with paragraph 194 of the NPPF, where applications have potential to affect designated heritage assets, the applicant should describe the significance of any heritage assets

affected, including any contribution made by their setting. Paragraph 194 confirms that the level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

6.20 Durrington Conservation Area covers an area which lies at the northern end of the settlement, and encompasses some of the historical main routes through the settlement and part of the water meadows beyond. Bulford Road lies to the eastern end of the designated Conservation Area, which the Conservation Area Appraisal and Management Plan (January 2009) records contains many smaller irregular plots, believed to formally housed a mixture of smaller houses, farmsteads and cottages. The banked area to the rear of Camellia, adjacent to the application site is noted within the Conservation Area Appraisal and Management Plan, which describes the land being excavated to create an area level with Church Street, first shown on OS Maps in 1880.

6.21 Whilst the wider Conservation Area contains some traditional vernacular buildings and elements such as chalk cob walls and thatch, the built environment within the immediate application site vicinity varies considerably to include a mixture of single storey bungalows, chalet bungalows and two storey dwellings, mainly detached in nature but of varying ages and architectural styles. Examples of the neighbouring buildings are shown at Figure 1 below, illustrating the variety within the built form in the area surrounding the application site.



Figure 1: Photographs evidencing variety in surrounding built form to the application site, at 7 and 8 The Ham (LHS) and Camellia (RHS)

6.22 The existing buildings on the site are not historic and do not make a positive contribution to this part of the Conservation Area, and arguably detract from the visual amenities of the surroundings. In contrast the proposed replacement buildings are of a high quality, designed with references to traditional design features such as the use of an oriel window, brick arch lintels and sash windows and with high quality external materials chosen to reflect elements from existing traditional buildings elsewhere within the Conservation Area, such as the use of conservation rooflights and brick and flint panels, the latter proposed

for use particularly on those elevations which will be visible from the public realm. As a result, the proposed development will blend harmoniously into its surroundings, preserving those traditional features considered to positively contribute to the character of Durrington Conservation Area and clearly enhancing the appearance of the area, through the removal of the existing low-quality buildings on the site.

6.23 Aside the Conservation Area, no other heritage assets stand to be affected by the proposed development. In particular, consideration has been given to any impacts on the listed building 'Bethany' located on College Road to the rear of the application site, however due to the land level and separation distances, the application site does not have a meaningful relationship with this listed building, which will be unaffected by the proposed development.

6.24 The above assessment accords with the requirements of paragraph 94 of the NPPF and reveals that the proposed development would preserve and enhance the character and appearance of the surrounding Conservation Area, a designated heritage asset, in accordance with the requirements of CP58 of the WCS.

Impact on Biodiversity

6.25 Policy CP50 of the WCS requires that assessment be made regarding the potential for the development to affect any protected species or habitats, on and off site. If applicable, measures should be proposed to mitigate any impacts which arise.

6.26 As the proposal concerns the demolition of an existing dwelling and garage the application is accompanied by a protected species survey report by Malford Environmental Consulting. Appropriate baseline ecological surveys were undertaken, including a Phase 1 bat (building roost inspection).

6.27 The survey of the buildings on the site found no evidence of bat roosting/occupation or other bat activity. The report concludes that the demolition and clearance of the site does not require a Natural England licence under the provisions of the Conservation of Habitats and Species Regulations 2017.

6.28 The ecology survey did not find evidence on the site of any other protected species or habitats and concludes that no mitigation proposals are necessary. Ecological enhancement recommendations are set out at sections 5.1 and 5.2 of the report and include habitat features that can be incorporated into the new building design to provide opportunities for roosting bats and nesting birds. Any permission can ensure, by means of a condition, that the development of the site is carried out in accordance with the findings and recommendations of the ecology report.

6.29 Subject to the enhancement measures outlined within Sections 5.1 and 5.2 of the ecological report, the development of the site would have a positive impact on protected species and their habitats.

6.30 The site lies within the Hampshire River Avon Catchment Area, where CP69 of the WCS requires development to incorporate measures to ensure that it will not adversely affect the integrity of those Natura 2000 sites. This includes issues concerning nutrient neutrality.

6.31 It is however noted that as the proposed dwelling is within the defined settlement boundary it is considered to be 'planned development' and as such is covered by the council's strategic mitigation scheme. The proposal is of course a 'one for one' replacement dwelling which further confirms that the proposal would have a neutral impact.

Highway Safety

6.32 Policies CP60 and CP64 deal with the traffic impacts of development and parking standards. These policies aim to ensure developments adequately address matters of access arrangements and road safety alongside adequate parking provision.

6.33 No alterations are proposed to the access point from the site onto Bulford Road, which can adequately and safely cater for vehicular trips associated with this one-for-one replacement of an existing dwelling, the application site being located within the settlement boundary of a market town, defined by policy at CP1 and CP2 of the WCS to represent a sustainable location suitable for residential development of this scale.

6.34 Off street parking and turning facilities are incorporated within the site layout with levels meeting the Council's adopted standards (which require 3 off street spaces for 4+ bedrooms). The site parking arrangement broadly reflects the existing situation, but with improvements in the form of a slight revision to the location of the replacement dwelling, allowing for a formalised and more generous parking facility at the front of the site and with additional secure parking provided within the detached garage. The set back of the gates within the driveway and open site frontage would ensure ease of access and good visibility at the site entry/egress, as per the current arrangement.

6.35 For the reasons outlined above, it is considered that suitable access and parking arrangements can be provided to allow for the development of the site in the manner proposed, in compliance with the requirements of CP60 and CP64 of the WCS and as such the scheme represents a sustainable form of development in this regard.

Impact upon Residential Amenity

6.36 Policy CP57 (vii) of the WCS requires development to have regard to the compatibility of adjoining buildings, the impact on amenities of existing occupants and to ensure appropriate levels of amenity are achievable, satisfactorily addressing the amenity criteria set out at CP57 (vii).

6.37 The site already supports an existing established residential use and is set within a residential context of predominately ribbon development located either side

of the road running to the north of the site. The proposed development, relating to a one-for-one replacement dwelling will not significantly alter the relationship between the site and surrounding land uses.

6.38 To the south of the application site, the neighbouring property 201 Bulford Road is set at a significantly higher level in comparison to the application site, which limits the impact of the development on this neighbouring property. Nevertheless, consideration has been given to ensure no adverse impacts would result to this neighbour by ensuring the building line of the replacement dwelling and garage are no closer to the south than those existing, and that heights and positions of openings in the south facing elevations of the replacement buildings have been carefully considered to prevent any loss of privacy. Furthermore, the separation distances between the buildings, land levels and retention of vegetation screening along the bank will all further act to ensure the amenities of 201 Bulford Road are preserved.

6.39 The neighbouring property to the northwest of the application site is Camellia, a detached dwelling which is set at a similar ground level to the application site but set back further to the northwest in relation to number 203. Currently existing boundary treatment allows for intervisibility between the two proprieties, with the detached garage and driveway to Camellia separating the two dwellings.

6.40 The proposed development is located no closer to the boundary with Cameilla than the existing dwelling on the site. The roof design of the replacement dwelling is pitched away from the northwestern site boundary and aside two conservation rooflights which serve a vaulted roof void, no further openings have been proposed in the northwestern roof slope of the replacement dwelling. At first floor level there are two windows proposed facing northwest, one serving a bedroom which is sited forward of Cameilla, away from the main amenity space serving the neighbouring property and the other serving a bathroom, which in the event of any approval could be conditioned to be obscured glazed, thereby ensuring no loss of privacy results to the occupiers of the neighbouring dwelling. The replacement garage building is inset from the shared boundary and separated by a distance in excess of 15 metres from the neighbouring dwelling, thereby ensuring it will not materially affect the residential amenity of the occupiers of Camellia. The scheme shows new boundary treatment in the form of a 1.3m high close boarded timber fence along the shared boundary, which will reduce intervisibility between the two dwellings and improve privacy levels in comparison with the existing situation.

6.41 The existing building on the site is of Woolaway construction, which has a limited lifespan and are known to experience a raft of construction issues, such as thermal inefficiency. The replacement of the building with a new, thermally efficient dwelling, build to the latest construction standards can only positively impact the living conditions and amenities of the existing and future site occupants. The proposed site arrangement sees the provision of private amenity space comparable with the existing situation and off-street parking levels to comply with the Council's adopted standards.

6.42 It is evident that the site could accommodate the replacement dwelling and garage proposed whilst ensuring amenity levels for surrounding occupants and uses are preserved. The proposal will offer significant benefits to the amenities experienced by the occupants of 203 Bulford Road. As such the application complies with the requirements as set out in the amenity criteria of policy CP57(vii) of the WCS and paragraph 130 of the NPPF.

7.0 PLANNING BALANCE AND CONCLUSIONS

7.1 This statement makes an assessment of the proposal against relevant local and national planning policy, against which the replacement dwelling fully accords.

7.2 The inability of the Council to demonstrate a deliverable five-year housing land supply across the county renders the spatial policies of the WCS out of date and paragraph 11 of the NPPF is engaged.

7.4 In such instance, footnote 7 paragraph 11 of the NPPF explains that for applications involving the provision of housing, the presumption in favour of sustainable development is the measure against which the proposal is assessed.

7.5 There are no policies within the framework which protect areas or assets of particular importance which provide a clear reason for refusing the application and therefore in accordance with paragraph 11 of the NPPF, permission should be granted unless any adverse impacts from doing so '*significantly and demonstrably outweigh the benefits*'.

7.6 This statement has outlined the benefits from approving the scheme, focussing on each of the three overarching objectives of the planning system in the pursuit of achieving sustainable development. To summarise, economic benefits would include a boost to the construction industry and supply chain (acknowledging such benefits are commensurate with the construction of a single dwelling) and continued support to local services and facilities from occupants of the dwelling, environmental benefits would see the replacement of an efficient dwelling built to a poor level of construction, with a new thermally efficient dwelling, built to a high standard of construction and design which will not only preserve, but enhance the character and appearance of the surrounding conservation area with specified ecological enhancements, and social benefits would see the improved living conditions for existing occupiers (as advocated by the framework at paragraph 130 (f)) and provision of a long term home for a local family adding to the vitality of the local community.

7.7 The application particulars demonstrate that the site would be redeveloped in a way which is in keeping with the local context and would preserve existing landscape character, whilst addressing matters of amenity and highway safety.

7.8 Taken holistically, the benefits associated with the application are not outweighed by any adverse impacts from granting permission for this proposal which represents a sustainable form of development in all forms, and therefore as required by para 11 of the NPPF we respectfully request that the application should be approved.