



**L a n d m a r k**  
**P L A N N I N G**

## **Planning Statement**

**For development of 9 Self-build dwellings at Water  
Lane Frisby**

- 1. Amend 4 planning conditions**
- 2. Add one planning condition.**
- 3. Submit two reserved matters applications.**
- 4. Discharge 6 conditions.**
- 5. Deed of Variation to S106.**

**All relate to planning application 16/00740/OUT.**

**June 2020.**

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## **1. Introduction and Purpose of report**

- 1.1** Planning application 16/00740/OUT, an outline application for residential development of up to 22 dwellings, was approved, subject to conditions on 20<sup>th</sup> March 2019. This Planning Statement covers the revision to this proposal and relates to a S73 application to modify conditions; the addition of one new condition; two Reserved Matters applications; and, the discharge of 6 conditions of the planning approval. In addition, the S106 accompanying the planning approval needs to be modified and for which a draft Deed of Variation is also submitted. One Planning Statement has been prepared, so that the proposal can be evaluated comprehensively.
- 1.2** S73 of the Town and Country Planning Act 1990 allows the determination of applications to develop land without compliance with conditions previously attached. This proposal is to alter a number of conditions to this approval so that nine self-build properties can be constructed. In particular, it is proposed to vary conditions 2, 4, 6 and 12 to reflect the nature of the proposals and the need for details to be agreed separately for each plot. The intention is that the variation of conditions will allow for the infrastructure and servicing of the site to take place prior to details being agreed for the individual plots.
- 1.3** Secondly, to support the above changed conditions, it is proposed that an additional condition in respect of adherence to a design code is added to the original consent (16/00740/OUT).
- 1.4** Thirdly, two Reserved Matters Applications to permission 16/00740/OUT are submitted for the first two self-build properties.
- 1.5** Fourthly, this Planning Statement covers applications to discharge conditions 7 to 12 of the planning approval in relation to flooding and drainage strategy. This is necessary work for the implementation of the proposals. It also greater certainty to the project over the issue that excited considerable local concern at the outline application stage.
- 1.6** Finally, a Deed of Variation is submitted to vary the original S106 agreement to conform with the Self Build proposal now submitted.

- 1.7** The details of the design of the proposals for nine self build and custom build are more fully outlined in the Design and Access Statement that accompanies the S73 application and two Reserved Matters applications.
- 1.8** This report will briefly describe the site and surrounding area before setting out the planning history of the site. The Borough and Neighbourhood Planning Policy will then be set out to show how this proposal sits at all fours with the statutory framework, including the legislation on Self Build and Custom Housebuilding. This is followed by national policy and practice guidance and finally emerging national policy.
- 1.9** This Planning Statement continues with a section summarising the pre-application advice that was received from the Borough Council. Other material considerations will then be set down, including current housing supply and delivery in Melton, as well as the local position on Self-build and Custom Housebuilding demand and supply. The current proposals will then be assessed against this background. Finally, the planning balance will be set down to assist the decision maker in determining these proposals.

## **2. Site and Surrounding Area**

- 2.1** The site is located to the north-west of the village centre of Frisby on the Wreake, Leicestershire. Frisby is located c. 9 miles north-east of Leicester and 3 miles west of Melton Mowbray. Approximately 550 people are resident in the village.
- 2.2** The site is part of a larger field of 3.4 ha (8.4 acres). It sits west of Water Lane (from which it is accessed), with a railway line to the north (including a railway crossing on the Lane), whilst there is housing to the east. There is a pumping station to the north-east, close to the level crossing. Grazing pasture is located to the south and west.

**2.3** Existing hedgerows and trees define most of the boundaries of the site. A wooden boundary fence exists along most of the northern and eastern edges of the site. A wire mesh fence borders the pumping station to the north-east with brick walls to the south-eastern boundary.

**2.4** The site's topography is relatively flat and is currently used as pasture land for sheep.

**2.5** Frisby on the Wreake is a sustainable settlement, defined in the adopted Local Plan as a Rural Hub. The A607 (Leicester to Melton) is situated less than half a mile to the south. The main services and facilities in the village include a primary school, two churches, public house, village hall, combined Post Office, shop and internet café, cemetery and fast broadband. There are regular bus services to Melton and Leicester.

### **3. Planning History**

**3.1** The only relevant planning history relates to the one planning application on the site. Outline application, 16/00740/OUT for residential development of up to 22 dwellings was approved on 20<sup>th</sup> March 2019. (It is this application to which amendments and additions outlined in section one above that are now sought).

### **4. Statutory Planning Policy**

**4.1** As S38(6) of the Planning and Compulsory Purchase Act 2004 explains: planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

**4.2** The Development Plan for this site comprises the Melton Local Plan 2011 to 2036, adopted by the Council October 2018 ("the Local Plan") and the Frisby on the Wreake Neighbourhood Plan, which was 'made' in August 2018.

## Melton Local Plan

**4.3** The Local Plan contains a number of relevant policies for the consideration of this application. These are listed below:

**4.4 Policy SS1 –Presumption in Favour of Sustainable Development.**

This policy states the familiar refrain and suitably in the explanatory text sets out a number of key points. To achieve this policy for new housing development Frisby is defined as a 'Rural Hub'. 85% of the 2144 dwellings allocated for the Rural Area of Melton in the Plan will be located within either 'Service Centres' or 'Rural Hubs'

**4.5 Policy SS2 Development Strategy.** The Council has agreed a housing requirement equivalent of 245 dwellings for each year of the Plan, with the overall quantity proposed of 6125 for the Borough. The housing supply proposed (Table 3 P23) aims to exceed this with 7316 dwellings planned. However, it is noted that the completions from 2011 to 2018 were only 777, equivalent to 111 dwelling per annum compared with the 245 projected. Consequently, the Policy proposes a minimum of 170 dpa from 2011 to 2021; a minimum of 245 dpa from 2021 to 2026; and, a minimum of 320 dpa from 2026 to 2036.

**4.6 Table 6 Residual Housing Requirements for Service Centres and Rural Hubs** (page 33) sets out that the expected requirement for new housing in Frisby is 72 in the Plan period. However, as **Table 6** also shows, a total of 118 are actually included in the Plan. These all now have planning permission. This is significantly greater than any other settlement at this level of the settlement hierarchy and easily exceeds over half of the larger settlements in the hierarchy above (service centres).

**4.7 Policy C1(A)- Housing Allocations** sets down the sites which are allocated for new housing in the Plan period. Three sites are outlined for Frisby: (FRIS 1 Land off Great Lane (48); FRIS 2 Water Lane (22) ( the site of this planning proposal); and, FRIS 3 Land South of village (48).

- 4.8 Policy C2 – Housing Mix.** This is only applicable for residential proposals of 10 or more dwellings. It is summarised here as it was relevant to the extant planning application on the site (22 units) and there is a condition of this consent that seeks to achieve a mix of house types, tenures and sizes.
- 4.9 Policy C4 - Affordable Housing Provision.** The Plan aims to secure affordable housing provision on all sites of 11 or more units and / or where the floor space exceeds 1000 sq.m. The level of required provision is different in different market areas, but for Frisby it is 40%.
- 4.10 Policy C8 – Self Build & Custom Build Housing.** It is expected that on sites of 100 dwellings or more that 5% of the plots will be supplied serviced for self or custom builders. While this policy is not strictly relevant to this proposal for 9 dwellings the active encouragement of the concept in the Plan is indicative of the Plan’s strategy. The preamble to the policy states that the analysis of the Council’s appropriate register indicates a clear preference for detached properties with plot sizes provided to reflect this.
- 4.11 Policy ENV1 –** This policy seeks to ensure that new development is sensitive to its setting with landscape proposals having regard to any design guidance for assessments of settlement fringe sensitivity.
- 4.12 Policy EN2 – Biodiversity and Geodiversity –** seeks to achieve net gains for nature and to protect biodiversity / habitat.
- 4.13 Policy EN8 – Climate Change.** This policy expects all new proposals to show how they can mitigate and adapt to climate change.
- 4.14 Policy EN9 – Ensuring Energy Efficient and Low Carbon Development.** Major development proposals will be required to

demonstrate how the need to reduce carbon emissions has influenced the design, layout and energy source used, subject to viability.

**4.15 Policy EN11 – Minimizing the Risk of Flooding.** Development proposals must ensure that they do not increase flood risk and also seek to reduce flood risk to others.

**4.16 Policy: EN12 – Sustainable Drainage Systems.** Major development proposals should demonstrate through a surface water drainage strategy that properties will not be at risk from surface water flooding, allowing for climate change effects.

**4.17 Policy D1 – Raising the Standard of Design.** All new developments, through siting and design, should be sympathetic to the character of the area; protect the amenity of neighbours; provide sustainable waste management; and, allow for appropriate access to the existing highway network.

**4.18 Policy IN2 – Transport, Accessibility and Parking.** New developments should have regard to location in terms of the use of sustainable modes of transport; do not unacceptably impact on the safety and movement of traffic on the highway network; and, provide appropriate parking and servicing arrangements.

### **Frisby on the Wreake Neighbourhood Plan**

**4.19** This Plan was made before the Melton Local Plan (August 2018 to October 2018). If there is conflict between the two Plans the latter (the Local Plan) takes precedence. (NPPF Para. 30).

**4.20 Policy H1 Housing Provision.** Permission will be granted for a minimum of 78 dwellings during the period 2017 to 2036.

**4.21 Policy H2 Housing Allocations.** Three sites are allocated, including approximately 22 dwellings at the site of this proposal. In total the allocations add up to 118 residential properties.

**4.22 Policy H3 Limits to Development .** The defined limits include all the site of this proposal.

**4.23 Policy H4 Building Design Principles.** This policy sets down a raft of good design principles for new development.

**4.24 Policy H6 Housing Mix.** New housing should provide a mixture of housing types specifically to meet local needs. Priority should be given to dwellings of 3 bedrooms or fewer.

**4.25 Policy ENV7 (E) Protection of Important Views.** One such view is immediately to the north of this proposal looking westwards towards Hoby from Water Lane.

## **5. The Self Build and Custom Housing Building Act 2015 (“the Self Build Act”)**

**5.1** Section 1 of the Self Build Act requires Council to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom-house building.

**5.2** Section 2 of the Act expects the Council to have regard to its Self-build and Custom House building Register when carrying out its functions. This includes development management decisions.

**5.3** Section 2A imposes on the Council a statutory ‘duty’ to grant suitable development permission in respect of enough suitable serviced plots of land to meet the demand for self- build and custom housebuilding in the Council’s area arising in each base period on a rolling three year basis.

## 6. National Planning Policy and Practice

### National Planning Policy Framework (NPPF) February 2019

**6.1 NPPF Paragraph 59** is clear that it is important that a sufficient amount and variety of land can come forward where it is needed; that the needs of groups with specific housing requirements are addressed; and, that land with permission is developed without unnecessary delay.

**6.2 NPPF Paragraph 61** states that the type and tenure of housing needed for different groups within the community should be assessed and reflected in planning policies and this should include people wishing to commission or build their own homes.

**6.3 NPPF Paragraph 68** makes clear that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly and that local planning authorities should support the development of windfall sites through their policies and decisions.

**6.4 NPPG Paragraph: 023 (Ref ID: 57-023-201760728)** explains that local authorities must give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom house building in their area. The level of demand is established by reference to the number of entries added to an authority's register during a base period. The Council has essentially three years to meet the identified demand in the base period.

**6.5 NPPG Paragraph: 014 (Ref ID: 57-014-20170728)** states that the 'duty' defined in the Act above can be demonstrated by considering this a material consideration in its decision-taking functions, using as evidence the Registers required by the above Act.

**6.6 NPPG Paragraph: 025 (Ref ID: 57-025-201760728)** states that authorities should consider how they can best support self-build and custom housebuilding in their area, including engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and, working with custom build developers to maximise opportunities for self-build and custom housebuilding.

## **7. The Housing White Paper and Planning for the Future (MHCLG) March 2020**

- 7.1** The importance that Government attaches to meeting the needs of people who want to commission or build their own homes is made clear in the Government's Housing White Paper which states that “The government wants to support the growth of custom build homes” and “Fewer homes are custom built in England than many other countries, but there is evidence of greater demand for them including from older people (Paragraph 3.14).
- 7.2** The Planning for the Future Policy Paper sets out the Government’s plans for housing and planning following the announcements in the 2020 Budget to get the country building.
- 7.3** The intention is to support community and self-build housing by supporting *“those who want to build their own homes to find plots of land and provide help to parish councils and neighbourhood forums who wish to build a small number of homes to allow their communities to grow organically, providing homes for the next generation and those wishing to downsize.”*

## **8. Melton Borough Council: Housing Mix & Affordable Housing Supplementary Planning Document (SPD)(July 2019)**

- 8.1** The Council approved an SPD for housing mix and affordable housing in 2019

in conformity with the Local Plan, adopted the previous year (para. 4.2 above).

- 8.2** A balanced range of dwelling sizes and types will be required on all developments where possible. (Note that the adopted Local Plan Policy C2 (see para. 4.8 above) applies this to schemes of 10 or more).
- 8.3** As with the Local Plan (Policy C4), the SPD expects residential developments of 11 units or more and/or where the floor space exceeds 1000 sq. m. to make provision for affordable housing (see para. 4.9 above).
- 8.4** The SPD states that while there is a strong preference for on-site provision for affordable housing, in some circumstances an off-site contribution may be acceptable. Section 4.2).
- 8.5** Where the number of affordable units that would result, is below the threshold of what would be commercially attractive to an affordable housing provider is one such exception. This is likely to be the case on this site with only 9 units in total. Moreover the nature of the high design requirements for this development and the greater infrastructure costs would clearly suggest that an off-site contribution is the appropriate solution in this instance.

## **9. Melton Housing Supply.**

- 9.1** As noted above (para. 4.5) the adopted Local Plan requires a total of 6125 dwellings within the Plan period. However, the allocations are set to exceed this with 7316 dwellings planned.
- 9.2** The Council's latest Annual Monitoring Report with information to August 2019 records that the Borough has a housing supply at 7.7 years. This is well in excess of the required 5 years, plus an appropriate buffer expected by the NPPF 2019.

**9.3** As Table 6 of the adopted Local Plan shows (see para. 4.6 above) the supply for Frisby (118 v 72) exceeds the village's theoretical requirement by over 60%.

## **10. Melton Housing Delivery.**

**10.1** According to the Housing Delivery Test Measurement for Melton for 2019 published in February 2020 by the Ministry of Housing, Communities and Local Government, Melton Borough has achieved 100% of its target in the years 2016 to 2019.

## **11. Melton Borough Demand & Supply for Self/Custom Build Homes**

**11.1** There is strong local demand for custom and self-build housing plots in the Borough which is not being met.

**11.2** To inform the development proposals, an assessment of the demand for custom and self-build housing in the wider area has been undertaken. Details are set out in a demand assessment report and reproduced separately in support of this application.

**11.3** As a result of this assessment, over 9,300 people have registered their interest with the landowner's enabling partner, Custom Build Homes, to commission or build their own home on land at Water Lane. The company are the U.K.'s only national enabler of custom build housing. They have an unrivalled national knowledge in their field of not only the demand, but also the most appropriate solutions to providing a supply of a seriously under provided section of the market. Most in demand are for three and four bedroomed properties with a garden and garage. Most prospective custom and self-builders want to purchase a serviced plot and most either want to, or are prepared to consider, a customised home to suit their needs.

- 11.4** Most prospective custom and self-builders are aged between 36-55, married and families with children. There is also some demand from older and younger people. Most are employed and well-capitalised and/or are asset rich, without the need for a mortgage to finance their project.
- 11.5** There are a range of motivations why people want to build their own home. The top three are to create an energy-efficient home; to future proof their property to meet their longer-term needs; and, to have more living space.
- 11.6** This healthy demand was corroborated by the Melton Housing Needs Study 2016, which found significant demand in the Borough. It has also been acknowledged by the Inspector in the report upon the current Local Plan (Matter 7), which concluded that the problem is the lack of supply of suitable plots, some of which are not actively being sold.
- 11.7** The latest evidence available from the Borough Council (February 2020) Self Build and Custom House Building Register shows that there are 80 individuals and groups registered. This accords with the slightly earlier data of the National Custom Build & Self Build Association (NaCSBA) (October 2019) with a demand for 82 individuals and 4 groups registered.
- 11.8** This low number is not surprising as industry practice concludes that demand on registers is closely related to how registers are promoted; whether Councils charge a registration fee; and, whether there are onerous eligibility criteria in place. Indeed intelligence from the Government-supported Right to Build Task Force indicates that 8 in 10 people are unaware that registers even exist.
- 11.9** Contrary to the NPPG (Paragraph: 012 Reference ID: 57-012-201707208 and Paragraph: 022 Reference ID: 57-022-20170728), the Council have not published the high level data of its register. However, a brief analysis of the register data supplied by the Council in support of this application suggests that:

- 40% of prospective 'self-builders' are couples with no children and a further 40% are families with children;
- Geographical preferences for plots are varied across the Borough- there is no clear preference where people want to build;
- People want to custom or self-build a home for a range of reasons, with about 1 in 3 being motivated by building a more sustainable home and wanting to be involved in its design to suit their needs;
- 45% want to self build a property, although there are some who are keen to custom build and/or build a kit home;
- 91% want to build a detached home;
- 10% want to build bungalows;
- 52% want to build larger properties (4-5 bed properties);
- 45% want a 2-3 bed property;
- 23% want to build within a year and a further 6% want to build within 2-3 years;
- 40% are looking to fund their project from existing assets (eg. sale of existing property);
- 35% are looking to fund their project with a mortgage; and
- 69% have given no details on their current incomes.

**11.10** The evidence of both the landowner's enabling partner Custom Build Homes and Council support the proposition that there is a healthy demand, which does not appear to be satisfied. Prima facie this demonstrates a severe under provision of plots in the Borough to satisfy the clear demand, which exists, as required under the Act (section 5 above).

**11.11** It should also be noted that the Council's web site in relation to allowing people to secure a place on the Self / Custom Build Register, as of 11/6/20 still refers potential applicants to an officer who left the Authority over 18 months ago with an e-mail to that address being rejected and returned to sender as undeliverable. One of the two current potential occupiers of the Reserved Matters applications does not fit any of the applicants in the Register despite trying to apply in the last 18 months. This suggests that the Register could significantly underestimate the demand as illustrated by the separate assessment, which has been carried out.

**11.12** There is clearly a very significant mismatch between a substantial demand and a very restricted supply. This is an important material consideration for the Council to take into account in determining this application.

## **12 Flood Risk & Drainage Issues**

**12.1** The issues of flood risk and drainage exercised particular concern at the time of the determination of the original planning consent. The Environment Agency and the Lead Local Flood authority both had no objections to a positive determination of the application, subject to conditions. There were six conditions imposed on the application in relation to the development of this site for residential purposes. They relate to the need for a surface water drainage scheme and an appropriate long-term maintenance strategy. An assessment of groundwater levels is required; along with a Phase 2 ground investigation and the establishment of finished floor levels. These details are presented in a report by MEC and accompany the applications to discharge planning conditions (see para. 1.1).

## **13 Design Issues**

**13.1** To ensure that the site delivers a high quality development and in the interest of good design this submission is accompanied by a Design Code. This sets out the key design parameters to securing a high quality development with coherent and consistent form. In accordance with good practice it is proposed that all development will comply with a condition upon a planning approval to the agreed Design Code (see para. 1.3 above). A landscaping framework is also set out to ensure that the scheme not only 'reads' as a whole, but also integrates with the village of which it will form a part.

**13.2** The documents also include parameters for minimizing the use of resources, both on and outside the plots, to meet the highest standards. This approach will ensure the development is of the highest quality whilst ensuring that individuals can build the homes that they want and is supported by the NPPF and NPPG.

## 14 Pre Application Advice

- 14.1 A submission was made to Melton Borough Council with receipt of both a formal reply and then a clarification on the application strategy proposed.
- 14.2 The principle of providing Self Build and Custom building development on the site is supported.
- 14.3 There are concerns about the development of 9 self-build properties on an allocated site, instead of the extant consent for 22 dwellings. These would need to be resolved. Further information about housing supply in both Frisby and the Borough would be required, along with information about housing mix; affordable housing contribution; the density of development / the optimum use of land; and finally design detailing and heritage assets.
- 14.4 As to the strategy of the S73 application, along with Reserved Matters submissions, this is not expected to pose any significant issues. A proviso was made that the landscaping should be carried out as a comprehensive solution and not piecemeal.
- 14.5 Consultation with local residents and the Parish Council was recommended prior to any planning submission.

## 15 Consultation with the Parish Council

(to be added)

## 16 Planning Balance

- 16.1 Outstanding Planning Consent.** This is a site that has outline planning consent for up to 22 dwellings, so a scheme that offers 9 self-build homes is totally in accordance with the existing approval.
- 16.2 The Development Plan.** The adopted Local Plan and the made Neighbourhood Plan allocate this site for residential development, while the former actively promotes Self Build and Custom Build housing in Policy C8 (para. 4.10 above). This Policy also remarks that analysis of the Council's appropriate register indicates a clear preference for detached properties with plot sizes to reflect this. This is also corroborated by the demand analysis supporting the application.
- 16.3 The 2015 Act.** The Development Plan policy position supports the requirements of the Self Build and Custom Housingbuilding Act 2015 (Section 5 above). This is also corroborated by the demand analysis supporting the application. Together with the significant unmet demand, this is a very significant material consideration.
- 16.4 National Policy.** Section 6 above demonstrates that both National Planning Policy and Guidance place a strong emphasis on the need for local planning authorities to plan for the needs of people wishing to commission or build their own homes. This is confirmed in the Housing White Paper and in the latest Government publication of March this year (section 7 above).
- 16.5** This proposal to develop this site for Self Build and Custom Build homes therefore sits at all fours with all national and local policy, statutory and non-statutory.
- 16.6 Housing Supply.** Melton Borough is in the fortunate position of having a significant housing supply (7.7 years, see para. 8.2 above). This positive position is confirmed for Frisby itself with a confirmed supply of 118 in the Local Plan, 60% in excess of a theoretical requirement for the village itself (see para. 8.3 above). Equally, as explained in para. 9.1, the Borough has 100%

satisfied the National Housing Delivery Test for the last three years.

**16.7 Self & Custom build Demand & Supply.** Section 10 of this Statement outlines the current position in the Borough in relation to the supply and demand for Self Build and Custom Build housing. The figures that are available for supply of suitable plots indicate a total paucity of provision. This effectively argues for urgent action to satisfy the known need and requirement, which is predominantly for detached properties of 4 / 5 bedrooms. And this site, with an extant consent for housing is in the rare position of not only being suitable, but also having a willing developer. The proposal, therefore, should be permitted without unnecessary delay, consistent with NPPF Paragraph 59.

**16.8 Supporting Technical Studies.** As outline consent has already been secured, the framework of technical issues in relation to all the other material planning considerations (from drainage and transport to archaeology and ecology) have already been resolved. Nevertheless a significant number of matters, particularly in relation to flooding, drainage and highways, remain conditioned and important to resolve, especially as two Reserved Matters submissions are contained within this proposal.

**16.9** The flooding and drainage issues excited significant concern at the outline stage (from nearby residents), although not statutory consultees. The six conditions pertaining to these issues are now submitted for discharge. This is parallel to the S73 revisions now proposed and the submission of the Reserved Matters applications for the first two plots.

**16.10** Additionally, approval is also sought to discharge the two highway conditions of the original outline approval (16/00740/ OUT). The information supplied clearly demonstrates that a technically safe and appropriate scheme can be achieved to allow this development to proceed.

**16.11 Design and Layout.** This proposal is accompanied by a substantial amount of information that demonstrates that a high quality scheme, which adapts to and respects the context is proposed. This Planning Statement should be read in conjunction with the accompanying Design and Access Statement (DAS).

The latter document incorporates a plot specific Design Code for the whole scheme (and for which approval is also sought, as a discharge to a new condition proposed for the outline consent (16/00740/OUT)). This will guide subsequent reserved matters applications for the remaining seven plots.

## **Conclusion**

- 16.12** All aspects of statutory and non-statutory policy, nationally and locally, indicate that this comprehensive submission should be supported.
- 16.13** The extremely favourable overall housing supply position contrasts sharply with the great weakness in the provision of Self Build and Custom House plots, despite a very healthy demand, which must be met. This obvious lacuna should weigh very heavily in the planning balance on this site that already has outline consent for housing in approving the revised and added condition(s); the reserved matters applications; the discharge of consent applications; and, the deed of variation to the S106 submission.
- 16.14** The detailed design work already undertaken and the subsequent control envisaged (by the submitted plot specific Design Code), demonstrate that a high quality scheme will be achieved by these proposals.
- 16.15** I commend this scheme to the decision maker.

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**June 2020**