

## OFFICER REPORT FOR DECISION UNDER DELEGATED AUTHORITY

**APPLICATION NO:** P0952.24

**WARD:** Hylands & Harrow Lg **Date Received:** 5th July 2024

**ADDRESS:** 3-11 Mint House, Grenfell Avenue  
Hornchurch

**PROPOSAL:** Erection of six terraced houses 4x 2bed, 1x 1bed and 1x 3bed with parking and amenities following demolition of existing warehouse buildings

**DRAWING NO(S):** 0184-KLA-00-GF-DR-19-001 Rev P01  
0184-KLA-00-01-DR-19 001 Rev P01  
0184-KLA-00-RF-DR-19 001 Rev P01  
0184-KLA-00-RF-DR-19 001 Rev P01  
0184-KLA-00-RF-DR-19 002 Rev P01  
0184-KLA-00-30-DR-19 001 Rev P01  
0184-KLA-00-GF-DR-10 001 Rev P01  
0184-KLA-00-GF-DR-10 002 Rev P01  
0184-KLA-00-GF-DR-10 003 Rev P01  
0184-KLA-00-GF-DR-10 004 Rev P01  
0184-KLA-00-GF-DR-10 005 Rev P01  
0184-KLA-GF-DR-10 006 Rev P01  
0184-KLA-00-XX-DR-18 001 Rev P01

**RECOMMENDATION:** It is recommended that **planning permission be REFUSED** for the reason(s) given at the end of the report

---

### **SITE DESCRIPTION**

The application relates to Mint House, 3-11 at the northern end of Grenfell Avenue. Set back from the street on the eastern side of Grenfell Avenue, this premises is accessed via an access way which opens into a courtyard to the front of the entrances.

Unit 6 was formally a mixed use premises, the majority of the building has been occupied solely by 'Futura' (Flooring Contractor) over the years as a storage/warehouse facility (Use Class B8). The floorspace comprised of a warehouse with ancillary kitchen/toilet on the ground floor, with additional storage space and offices at mezzanine level. The site has been subject to numerous applications over the years seeking to convert/alter the premises for residential function.

The surrounding area is largely residential in nature, comprising a range of properties types and designs. In addition, there are also a number of commercial premises within the vicinity. The site is

neither listed, nor within a Conservation Area.

## DESCRIPTION OF PROPOSAL

Consent is sought for the demolition of the existing single storey warehouse/commercial buildings and the erection of six terraced houses - comprising four, two bedroom, one three bedroom and one one bedroom unit with associated areas of parking/amenity provision.

The application site has an extensive planning history. In 2019 an application for the "residential use and external alterations/enhancements to roof of existing building" was made. At the time of consideration there was some confusion as the building had also been subject to a number of other earlier submissions for prior approval and it was evident that in part some works had been undertaken to facilitate the conversion to residential. The 2019 application considered nine flats (accepting that this was materially less than the prior-approval fall-back position offered) but recognising that the prior-approval applications were likely never meant to be implemented. The application was refused and subsequently dismissed at appeal.

Most recently an application was refused under reference P1864.24 for the the demolition of the existing single storey warehouse buildings and the erection of 7No two storey residential terraced houses. This application was refused for the following reasons:

The proposed development through the arrangement of built form at the extremities and their massing would present as visually cramped through the limited separation from the shared boundaries of the site. This would be exacerbated by the two storey form of the buildings and in doing so the proposals would neither reflect existing local character and patterns of development, nor introduce positive new character. The proposals would therefore be contrary to Policies 7, 10 and 26 of the Havering Local Plan 2016-2031 and also Paragraph 135 of the NPPF which amongst other considerations requires fundamentally that development add to the overall quality of the area whilst also establishing or maintaining a strong sense of place.

The proposals through the cramped nature of the development and limited separation from shared boundaries would provide confined and enclosed private amenity areas within which outlook from internal and external spaces would be poor. Outlook from first floor windows would be directed at the flank walls of adjoining premises in some instances. These factors would contribute to the development resulting in substandard residential accommodation to the detriment of the amenity of future occupiers and therefore contrary to the objectives of Havering Local Plan 2016-2031 Policy 7 and London Plan Policy D6. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers.

The terraced row sited along the southern boundary of the site through lack of separation from shared boundaries to the side and rear in conjunction with the massing proposed would form a visually intrusive and overbearing feature from the adjoining sites. This would result in levels of overlooking and overshadowing which would be harmful to amenity and enjoyment of these properties. The proposals are therefore contrary to Havering Local Plan 2016-2031 Policies 7, 26 and 34. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers.

The current submissions seeks to overcome the above. As revised the current proposals concentrate development in a single terraced row parallel to the eastern boundary.

## RELEVANT HISTORY

|          |                                                                                                                                                                                                                                                          |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P1864.23 | The demolition of the existing single storey warehouse buildings and the erection of 7 No two storey residential terraced houses.<br>Refuse<br>16-02-2024                                                                                                |
| P1204.19 | Application for residential use and external alterations/enhancements to roof of existing building<br>Refuse<br>15-11-2019                                                                                                                               |
| N0033.19 | Proposed non-material amendment to change internal layout of five flats approved under J0005.18<br>Withdrawn<br>09-09-2019                                                                                                                               |
| J0017.19 | Prior Approval Notification of a change of use from B1(c) (light industrial) to C3(residential) - to form 2 residential units<br>Prior App COU Given<br>14-08-2019                                                                                       |
| Q0122.19 | Change of use from B8 (Storage & Distribution) to C3 (Residential) to 5 studio residential dwellings and 9 ancillary residential parking spaces (Prior Approval) J0005.18 Discharge of Conditions(s) 3 (Part B)<br>ALL DECISIONS<br>ISSUED<br>25-07-2019 |
| Q0262.18 | Discharge of Condition Conditions(s) 3 (A) of J0005.18<br>ALL DECISIONS<br>ISSUED<br>13-12-2018                                                                                                                                                          |
| P0861.18 | Full application for external alterations to existing warehouse consistent with its approved change of use to residential<br>Refuse<br>20-08-2018                                                                                                        |
| J0007.18 | Change of use from B1a ( Storage & Distribution to C3 (residential) to 4 studio residential studio dwellings<br>Prior App COU Given<br>09-04-2018                                                                                                        |
| J0005.18 | Change of use from B8( Storage & Distribution to C3(residential) to 5 studio residential dwelling and 9 ancillary residential parking(PRIOR APPROVAL)<br>Prior App COU Given<br>09-04-2018                                                               |

## CONSULTATIONS/REPRESENTATIONS

Neighbouring occupiers were invited to comment through direct notification with three letters of representation received, the comments made are summarised below:

- Loss of privacy/sense of being overlooked
- Visually intrusive/overbearing

- Noise and disturbance
- Parking/highways impacts

(OFFICER RESPONSE: Some matters raised such as disturbance during works through noise/vehicle movement and loss of property value are not material considerations. Other matters relating to personal circumstances whilst noted are also regrettably not material considerations for the planning process).

In addition the following comments were made by other stakeholders:

Anglian Water - No objection  
 Thames Water - No objection  
 LFB (Hydrants/Access) - No objection  
 LBH (Streetname/numbering) - No objection  
 LBH Waste/Recycling - No objection in principle, subject to suitable arrangement  
 LBH Highway Authority - No comments  
 LBH Public Protection - No comments  
 Historic England - No objection

## **RELEVANT POLICIES**

Havering Local Plan 2016-2031 Policies 7, 20, 23, 24, 26 and 34  
 London Plan 2021, in particular Policies H1, D1, D4, D6, T6.  
 NPPF

## **MAYORAL CIL IMPLICATIONS**

Information provided is suggestive of there being no net increase in terms of floor-space. In the absence of any evidence to suggest otherwise, there would be no requirement for contribution under the CIL regulations.

## **STAFF COMMENTS**

## **PRINCIPLE OF DEVELOPMENT**

The National Planning Policy Framework states that housing applications should be considered in the context of the presumption in favour of sustainable development. The London Plan notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality accommodation. The provision of residential accommodation is consistent with the NPPF and the objectives of the Havering Local Plan 2016-2031 which at Policy 3 is supportive of housing provision in sustainable locations. In addition the London Plan 2021 notes the pressing need for housing and the general requirement to improve housing choice, affordability and quality at Policy H1 whilst also acknowledging that development should optimise housing output subject to local context and character at Policy D1.

The principle of residential use in this location has previously been regarded as acceptable. Whilst no compelling argument is made by the applicant in respect of Policy 20 of the Local Plan which seeks to resist the loss of non-designated industrial land it is evident that the historic use is somewhat anomalous in this location, given its relationship to surrounding land uses which are predominantly residential. As such and on balance its loss is not regarded as a barrier to the development proceeding.

Furthermore it is observed that consideration has been given to Policies 5 and 9 of the Local Plan which prioritises family (3 bed units). The Policy requires that developers demonstrate how they have sought to maximise the provision of family housing within their schemes. In contrast to the earlier application made, the development includes one, one bedroom two person unit at the northern most part of the terrace. Whilst one bedroom units are discouraged it is noted that the development on the whole is comprised of dwellings capable of being occupied by small families and that there would be an acceptable mix.

Policy 10 applies also given the relationship of the site to surrounding built development in the opinion of officers. Policy 10 requires amongst other considerations that development fundamentally does not impact on the amenity of surrounding occupants, that dwellings provide sufficient amenity space and do not prejudice the redevelopment of adjoining sites.

Additional considerations are the Housing Delivery Test results for 2022. The Housing Delivery Test Result for 2022 published 19th December 2023 are is 55%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies. This is in addition to Havering not being able to currently demonstrate a five year supply of deliverable housing sites. Therefore the presumption in both instances applies.

Having regard to the above the proposals are acceptable in land use terms. However the development requires further consideration as to the quantum of development, quality of accommodation, design, amenity and highways/parking/safety.

## **DENSITY/SITE LAYOUT**

Policy D6 (Housing Quality and Standards) of the London Plan advises that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures. To that end the policy requires that new residential development conform to minimum internal space standards. There are set requirements for gross internal floor areas of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and minimum floor to ceiling heights. The minimum gross internal floor area requirements and room sizes takes into account commonly required furniture and the spaces needed for different activities and moving around.

New dwellings must also demonstrate an acceptable arrangement of private amenity space. The Adopted Residential Design SPD states that private amenity space should be provided in single, high quality, usable, enclosed blocks which benefit from both natural sunlight and shading. The Residential Design SPD does not prescribe fixed standards for private amenity space, which can be restrictive on small and awkward sites. The London Plan (2021) offers guidance on this matter in

the sense that minimum standards are present in Policy D6. It states that where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.

These standards are reflected in the Havering Local Plan 2016.2031 at Policy 7 which requires compliance with the space standards referenced above. Applying the standards to the proposed dwellings they would show compliance in terms of gross internal floor areas, bedroom sizes and mix whilst also demonstrating adequate headroom. In the case of the one bedroom unit, it is noted that the GIA is well in excess of the minimum and in the region of that required for a two bedroom unit. Officers would question whether the use of this space is appropriate and whether it aligns with the objectives of the London Plan and other policy requirements, particularly having consideration to Policy 5 of the Local Plan. However on balance, it is not considered that this is a barrier to the development receiving support.

Whilst no study has been undertaken there is no evidence before officers that rooms would not receive adequate light.

Outlook was a key consideration previously with the view taken that the development previously was cramped and that this translated to a low quality living environment through limited outlook. The revised scheme has a more traditional layout with rear gardens laid out against the eastern boundary with the dwellings forming a singular terraced row. Whilst this offer improvement over the earlier scheme the plots would be shallow with the separation from the rear boundary at most instances less than five metres. Mindful that the rear gardens would need to be enclosed on three sides, for units 2, 3, 4 and 5 in particular it is considered that there would be a sense of enclosure from inside and outside spaces as a result of the limited plot depth.

Whilst meeting the minimum areas given by the London Plan, the London Plan requires that private amenity space for each dwelling "should be usable and have a balance of openness and protection, appropriate for its outlook and orientation". Whether the amenity areas shown are of a sufficiently high quality, or a space of retreat as the London Plan requires it is questionable. Whilst improved over the earlier submission there is still a sense that the development is cramped and that this does not reflect a suitably high quality living environment.

As such officers do not consider that the proposals comply with the objectives of London Plan Policy D6 and in doing so Havering Local Plan 2016-2031 Policies 7 and 10 and the Framework (Para 135). The character impacts of the limited plot size and the wider character impacts of the development will be considered below.

## **DESIGN/IMPACT ON STREET/GARDEN SCENE**

Paragraph 128 of the NPPF states that planning decisions should take into account the desirability of maintaining an area's prevailing character and setting (including residential gardens) and recognises the importance of securing well-designed, attractive and healthy places. The Framework states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It goes on to set out that good design is a key aspect of sustainable development, in so far as that it creates better places in which to live and work and helps make development acceptable to communities. The Framework requires that permission is

refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area.

The surrounding environment is composed of a variety of built form; however there is a general consistency in terms of scale and massing of two storey detached and semi-detached dwellings in the vicinity, with traditional suburban back-to-back gardens. In response to the earlier refusal the scheme is revised to show a single terraced row, rather than the pair sought previously. This has the effect of presenting a consistent mass with unifying design features not far removed from the existing arrangement. As with earlier decision making the provision of a contemporary design is not undesirable but would be removed from established character. The drawings are suggestive of a high quality finish and the architectural style indicated has positive qualities.

The existing situation is noted, however the proposals through quantum of development and relationship to shared boundaries would continue to present as visually cramped. This is reflected in the limited depth of plots, close relationship to the northern boundary and massing more generally. There is an expectation that back-land development would sit more comfortably within its respective plot. It is accepted that the existing arrangement on site is commercial in nature and perhaps undesirable, but it is nevertheless contained well within the site in contrast to the proposals which seek to increase massing at the boundaries of the site which may be prejudicial to the redevelopment of adjoining sites (Policy 10). As shown the proposals are at odds with with surrounding patterns of development and it has not been demonstrated that this is the most appropriate way of redeveloping the site for residential purposes.

The National Planning Policy Framework promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained. The benefits of this would however need to outweigh the other potential harm arising which in the opinion of officers it would not. The layout shown, design concept and massing would be regarded as being at odds with the established urban grain and detrimental to local character. As such there would be conflict with the objectives of the Havering Local Plan 2016-2031, specifically Policies 7 and 26, as well as the NPPF and London Plan 2021.

## **IMPACT ON AMENITY**

Policy 7 of the Havering Local Plan 2016-2031 (HLP) states that planning permission will not be granted where the proposal results in unacceptable overshadowing, loss of sunlight/ daylight, overlooking or loss of privacy, noise, vibration and disturbance to existing and future residents. This policy is to be read in conjunction with Policy 26 however the objectives are reflected in Policy 34 also which states that development will not be permitted where it would unduly impact upon amenity, human health and safety and the natural environment by noise, dust, odour and light pollution, vibration and land contamination. Policy 10 of the HLP amongst other considerations requires that development not have a significant adverse impact on the amenity of existing and new occupants. These objectives are reflected in the National Planning Policy Framework also.

The development is bordered by commercial units to the north and residential broadly in all other directions at varying distances. The terraced row would run parallel to the eastern boundary, separated by the rear gardens of those dwellings fronting Upper Rainham Road. At the distances involved, it is not considered that there would be any impact on outlook. However given the limited plot depths and massing of the dwellings they would be present in views from the rear gardens of

adjoining sites. It is considered that they would through their limited separation/shallow plot depths and massing present as visually dominant and overbearing features.

Turning then to the adjoining flatted block to the west (13 Glendale Lodge), the proposed terrace is designed to reduce bulk when viewed from this site with the roof pitched down and forward facing windows serving circulation space at first floor level. These windows would be obscurely glazed through condition to remove any direct overlooking of the amenity space of 13 Glendale Lodge. Through the design of the dwellings it is unlikely that the building would present as unacceptably overbearing from this site (mindful of the existing situation) however the adjoining site runs parallel to the application site. Whilst at first floor level the end of terrace dwelling is set in, it is not considered that this addresses the visual bulk of the gable end/flank elevation which would present as a wall of development from this site/amenity space. The resultant building would be objectively more bulky and pronounced than the existing and this would be detrimental to amenity. Similarly confined relationships do not exist within the locality.

To the north the development is built up to the shared boundary. Notwithstanding the character impacts of this in the back-land setting as identified, this confined relationship may have a bearing on the redevelopment of the adjoining plot. Whilst the likelihood of this land coming forward for redevelopment is limited the lack of any meaningful separation at first floor level would reduce the opportunity for development on this adjoining site in a manner inconsistent with the objectives of the Local Plan (Policy 10).

Given that the northern boundary is bordered by commercial units, the main consideration is the occupants above the parade. To that end it is not considered that the proposals would be detrimental to outlook, nor would there be any meaningful loss of light.

Turning then to other associated impacts, the access is somewhat narrow and bordered by residential on either side. Whilst this may be somewhat inconvenient for existing residents it is accepted that this is an historic arrangement and there is no evidence that the commercial use as existing or as may be brought into use in the future would not attract greater movement and comings and goings than the redevelopment for residential as proposed. The relationship to amenity areas would not be unusual in the suburban environment but given their close proximity and confined area this does require consideration by the LPA.

The proposals through the scale, bulk and mass of the dwellings proposed would have an overbearing impact and be detrimental to the enjoyment of surrounding properties and materially harmful to the occupiers of those dwellings. The development therefore fails to comply with Policies 7, 10, 26 and 34 of the Havering Local Plan 2016-2031 as well as the objectives of the NPPF in particular Para 135 which requires a high standard of amenity for existing and future users.

## **HIGHWAY/PARKING**

Parking provision and matters of highway consideration are represented in Policies 23 and 24 of the Havering Local Plan 2016-2031. However given the PTAL rating of 2, this engages the London Plan parking standards. Paragraph 115 of the NPPF is a further consideration and relates to highway safety.

Given that this is an existing access and that the level of movement to and from is somewhat

ambiguous given the historic commercial function, it is not envisaged that its continued use would give rise to any known matters regarding highway safety. There would be clear visibility from either end and whilst two vehicles could not pass one another owing to the limited width the instances of this happening are likely to be low. Furthermore, having regard to the level of access to public transport, amount of parking proposed and prospective occupancy of the units the number of parking spaces and their locations are considered to be adequate in policy terms.

There are no objections raised with regards to servicing of the site.

The provision of EVCP is noted and further detail could be secured through condition in the event of approval.

The location of refuse storage and cycle storage is noted, whilst not strictly aligning with the guidance for architects by the Council's waste team as shown, it is not considered that there is not an acceptable arrangement capable of being achieved. The lack of circulation space around the properties results in communal cycle storage. This of itself is not objectionable but it has not been demonstrated that what is shown would comply with London Plan/TFL guidance. Nevertheless detail could be secured through condition.

There are not considered to be any grounds to withhold permission on matters of parking and highway safety. This view is supported by the absence of an objection by the Highway Authority.

## **OTHER ISSUES**

At Paragraph 136 of the NPPF it is recognised that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. The Framework requires planning policies and decisions ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments, that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. These objectives are reflected in Havering Local Plan Policies 27 and 30.

As noted with the earlier refusal, aerial photographs for the site show a large mature tree in the south eastern corner of the site/adjacent site. It was not possible to view the tree when attending the site and the applicant has not provided any detailed photographs or referenced the tree on any drawings. As the proposals are recommended for refusal for other reasons this matter has not been explored further. It is advisable that this is explored in advance of any appeal or resolved prior to any resubmission and justification given for the removal of it, or measures to retain it if possible.

## **KEY ISSUES/CONCLUSIONS**

On the 19th December 2023, the Government published the Housing Delivery Test result for 2022. The Housing Delivery Test Result for 2022 is 55%. In accordance with the NPPF the "Presumption" due to housing delivery therefore applies.

Furthermore Havering cannot currently demonstrate a five year supply of deliverable housing sites. The Havering Local Plan was found sound and adopted in 2021 in the absence of a five year land

supply and the Council is committed to an immediate update of the Local Plan. This is set out in the Council's Local Development Scheme. An update to the trajectory is being prepared but there is no firm date for the work to be completed. Therefore, in the meantime whilst the position with regard to housing supply is uncertain, the "Presumption" due to housing supply is applied.

The Presumption refers to the tilted balance set out in Paragraph 11(d) of the NPPF as if the presumption in favour of sustainable development outlined in paragraph 11(d) of the National Planning Policy Framework (NPPF) has been engaged.

Para 11(d) states that where the policies which are most important for determining the proposal are out of date, permission should be granted unless (i) the application of policies in the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development, or (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Fundamentally this means that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

The proposed development would offer a modest contribution to housing supply and delivery and this would weigh in favour of the development. However, paragraphs 131 to 139 of the NPPF require consideration of character and high quality amenity for existing and future users. For the reasons given in the preceding sections of this report it is considered that the development is unacceptable.

The adverse impacts identified would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole. Therefore, the proposal does not benefit from the presumption in favour of sustainable development set out in paragraph 11(d) of the NPPF. Having had regard to the above and in doing so all relevant planning policy and material considerations, REFUSAL is recommended accordingly.

## **RECOMMENDATION:**

It is recommended that **planning permission be REFUSED** for the following reason(s)

### **1 Refusal non standard**

The proposed development through the arrangement of built form and massing, relationship to shared boundaries and layout would present as visually cramped. This would be exacerbated by the massing of the dwellings and in doing so the proposals would neither reflect existing local character and patterns of development, nor introduce positive new character. The proposals would therefore be contrary to Policies 7, 10 and 26 of the Havering Local Plan 2016-2031 and also Paragraph 135 of the NPPF which amongst other considerations requires fundamentally that development add to the overall quality of the area whilst also establishing or maintaining a strong sense of place.

### **2 Refusal non standard**

The proposals through shallow plot depth and limited separation from shared boundaries would provide confined and enclosed private amenity areas within which outlook from internal and external spaces would be poor in particular for those dwellings not at either end of the terrace. These factors contribute to the development resulting in substandard residential

accommodation to the detriment of the amenity of future occupiers and therefore contrary to the objectives of Havering Local Plan 2016-2031 Policy 7 and London Plan Policy D6. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers.

**3 Refusal non standard**

The proposed terraced row would present as visually dominant and overbearing from adjoining sites. Through limited plot depth, the scale bulk and mass of the dwellings proposed would form visually intrusive and overbearing features from adjoining sites, in particular 15 Grenfell Avenue and those dwellings fronting Upper Rainham Road. The proposed development would be harmful to amenity and enjoyment of these properties. The proposals are therefore contrary to Havering Local Plan 2016-2031 Policies 7, 26 and 34. There would also be conflict with Paragraph 135 of the National Planning Policy Framework which seeks to ensure a high standard of amenity for existing and future occupiers.

## **INFORMATIVES**

**1 Refusal - No negotiation ENTER DETAILS**

Statement Required by Article 35 (2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015: Consideration was given to seeking amendments, but given conflict with adopted planning policy, notification of intended refusal and the reason(s) for it was given to the agent in writing 02-09-2024

**Authorising Officer:**



Habib Neshat

2nd September 2024