

**Chapter 3: Planning Policy Context**

**Land off Duke's Park, Woodbridge**

**ENVIRONMENTAL STATEMENT**

November 2015

### **3.1 INTRODUCTION**

- 3.1.1 This chapter considers planning policy and guidance from National Planning Policy documents, the Development Plan and other relevant statutory documents. All the policies which have been considered are relevant for the environmental assessment of the application site.
- 3.1.2 The Development Plan is the starting point for the determination of any planning application. The Development Plan for Suffolk Coastal District Council is made up of:
- Suffolk Coastal Local Plan remaining 'Saved policies' of Suffolk Coastal District Council (July 2013) and First & Second alterations.
  - Core Strategy and Development Management Policies (adopted July 2013)
- 3.1.3 The structure of the following chapter will be:
- Suffolk Coastal District Council Development Plan;
  - National Planning Policy; and
  - Other material considerations.

### **3.2 SUFFOLK COASTAL DISTRICT COUNCIL DEVELOPMENT PLAN**

- 3.2.1 Suffolk Coastal District Council's development plan is made up of:
- Suffolk Coastal Local Plan remaining 'Saved policies' of Suffolk Coastal District Council (July 2013) and First & Second alterations.
  - Core Strategy and Development Management Policies (adopted July 2013).
- 3.2.2 Within the planning statement submitted as part of the planning application, the planning policies are assessed in detail, along with an assessment of the housing supply for Suffolk Coastal District Council. This section will identify relevant policies from the development plan which are considered relevant for the environmental assessment of the application site. For completeness the remaining environmental, design and technical development-management policies of relevance have been considered within a Policy Compliance table, which can be found at Appendix 9 of the Planning Statement.

#### **The Suffolk Coastal District Local Plan (Adopted 1994, incorporating First and Second Alterations – 2001 & 2004) Saved Policies**

- 3.2.3 The Suffolk Coastal District Local Plan (SCDLP) (Incorporating First and Second Alterations – 2001 & 2004), was first adopted in 1994. A number of Local Plan policies were saved by the Secretary of State's Direction.
- 3.2.4 Policy AP13 Special Landscape Areas states that the valleys and tributaries of the Rivers Alde, Blyth, Deben, Fynn, Hundred, Mill, Minsmere, Ore and Yox, and the Parks and Gardens of Historic or Landscape Interest are designated as Special Landscape Areas and shown on the proposals map. The District Council will ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality. The site does not fall within this area designation.

3.2.5 The Local Plan proposals map defines the application site as outside of the 'Physical Limits' of the town of Woodbridge and in a location where a Landscape Enhancement Area policy applies – Saved Policy AP214.

3.2.6 Policy AP214 – Ipswich Fringe – Ipswich Road/Sandy Lane Martlesham states:

*'The land lying between Sandy Lane and the A12, as shown on the Proposals Map, is considered to be a prominent and essential component of the Fynn Valley, lying between the Special Landscape Area to the west and the Area of Outstanding Natural Beauty. The District Council will encourage enhancement measures which improve the landscape of this area to the same quality as that to the west'.*

3.2.7 The explanatory text accompanying the policy goes on to state:

*'The land clearly forms part of the valley of the River Fynn, which is itself an extension to the Area of Outstanding Natural Beauty. The valley to the west has been designated as a Special Landscape Area and, if it were not for the presence of such intrusive features as sodium lighting columns and untidy horticultural and agricultural buildings, this particular area would be of a similar quality and designated as part of the Special Landscape Area'.*

3.2.8 This policy was set in accordance with the Structure Plan, meaning it is now considerably out-of-date. Since the adoption of the Suffolk Coastal District Local Plan there has been a material change to the planning approach for local designations. Paragraph 215 of the National Planning Policy Framework (NPPF) requires weight be given to relevant policies in existing plans according to their degree of consistency with the Framework.

3.2.9 Paragraph 113 of the Framework states that protection of land should be commensurate with its status, appropriate weight should be given to its importance and any local landscape policy should be based against a criteria to assess the harm of the development on the designation.

3.2.10 The site itself has no national or european designation. Whilst the site lies within close proximity to the Deben Estuary Special Protection Area (SPA)/ Ramsar site, it has been shown in the 'Information for HRA report' (Ecology Solutions) that accompanies this application, that there will be no significant adverse effect on the SPA/Ramsar site either alone or in combination with other plans or projects. Consequently an Appropriate Assessment is not required, any potential impacts can be mitigated and the presumption in favour of sustainable development, as outlined in Paragraph 14 of the NPPF, still applies.

3.2.11 It is considered that the site is very well contained and is influenced by Ipswich Road and the urban edge of Woodbridge, therefore has a stronger relationship to existing development to the north and west on Top Street, than the wider landscape. The design team have taken particular care to ensure that the siting and design of the development are sensitive to the wider landscape setting. The development proposals include the retention of existing vegetation along the site boundaries and new tree and hedgerow planting where appropriate to create filtered views of the development from surrounding high quality landscape areas.

- 3.2.12 The site has no distinctive landscape features and development would assimilate into the adjacent residential landscape. It would therefore not unacceptably detract from the overall character and appearance of the surrounding area.
- 3.2.13 Policy AP212 – Ipswich Fringe – Open Character of Land between Settlements seeks to maintain an open character and separation between villages on the Ipswich Eastern Fringe, Ipswich and Woodbridge, which includes the land between Martlesham and Woodbridge.
- 3.2.14 Gladman contend that this policy should be given limited weight in relation to the proposed site of a number of reasons:
- Gladman submit that development can often be located in settlement gaps, without leading to the visual or physical merging of settlements, eroding the sense of separation between them or resulting the loss of openness and character.
  - The application site does not fulfil the description of being 'open character', given the location of the train line, and residential and business properties on Top Street and Sandy Lane. Gladman maintain that the proposal site is a logical extension to the town and 'rounds off' the built up area, with the railway line to the south forming a strong boundary to the settlement. Rather, the land to the south of the railway line along Top Street ensures the separation between the two settlements and open character of the land is not hindered.
  - Whilst the text in the Local Plan refers to land between Martlesham and Woodbridge, the site itself has no such policy designation on the Proposals Map. Other areas that clearly fall within the Ipswich Fringe Policy AP212, such as land designated between Martlesham, Rushmere St Andrew and Ipswich, have been clearly defined on the proposals map.
- 3.2.15 The site is also considered to be subject to Policy AP236 – Woodbridge & Melton – Restraint. This policy states:
- 'The strategic policy of restraint on new housing development in Woodbridge/Melton will continue to be applied through the retention of the physical limits boundary, as defined on the proposals map. New housing development will, therefore, consist of infilling, groups or small-scale developments, subject to the following:*
- *no material adverse impact on the Conservation Areas or Listed Buildings;*
  - *no material adverse impact on the urban fringe or setting of the Town (see also Policy AP240);*
  - *the avoidance of the loss of areas which are important components of the street scene, character of the Town, or Townscape, eg open spaces or woodland (see also Policy LP237);*
  - *access and highway considerations;*
  - *other policies of the Local Plan and related Supplementary Planning Guidance'.*
- 3.2.16 It is important to note that the adopted settlement boundaries and relevant housing supply policies are not up-to-date and are inconsistent with the policies contained in the Framework.

- 3.2.17 Paragraph 215 of the Framework states that weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework. It is therefore considered that whilst the 'physical limits boundary' for Woodbridge has not been deleted in the Core Strategy (Appendix D of the Core Strategy), the development limits set out in the Local Plan should now be given little weight as it conflicts with policies within the Framework.
- 3.2.18 This policy is out-of-date as it restricts all new development beyond the existing built-up limits of the settlements.
- 3.2.19 The policy also conflicts with policies in the subsequently adopted Core Strategy, which seeks to direct some future housing growth to Woodbridge.
- 3.2.20 Moreover, this policy is time-expired as the Council does not have a five-year housing land supply and so relevant policies for the supply of housing should not be considered up-to-date. Therefore the policy should be afforded extremely limited weight.
- 3.2.21 Woodbridge is one of the districts most sustainable towns, which can assist in achieving SCDC's objectively assessed need (OAN). Therefore, such a policy will undoubtedly prevent the Council meeting its current and future housing needs.
- 3.2.22 Policy AP250 Woodbridge: Riverside recreational area states that to the south of the 'developed' part of the riverside, towards Kyson Point, the riverside and marshlands create a sense of isolation and peace. The principal objective for this area, therefore, should be to retain and possibly enhance these qualities, which have made this area so popular for walkers and bird-watchers.
- 3.2.23 The Riverside area to be used for recreational purposes is shown on the proposals map. The District Council intends that the stretch of Riverside south of this area, and between the railway line and the river wall, should remain undisturbed and its present character be retained.

### **Suffolk Coastal District Core Strategy (July 2013)**

- 3.2.24 The SCDC Local Plan - Core Strategy & Development Management Policies (Core Strategy) was adopted in July 2013. An independent Inspector appointed by the Government examined the soundness of the Core Strategy following its submission to the Secretary of State in May 2012. The Inspector's Report was issued on 6 June 2013. He found the Core Strategy sound and capable of adoption (despite the assessed housing need being based on 2010 figures), subject to a number of main modifications. This was on the grounds that SCDC commence with a review of the housing projections by 2015, to enable additional land to be identified against updated objectively assessed housing needs, potentially to 2031, taking advantage of the full 2011 Census information.
- 3.2.25 Policy SP1 – Sustainable Development states that central to the Core Strategy for the future of the Suffolk Coastal district, is the achievement of sustainable development. The strategy in this respect will be to:
- (a) mitigate against and adapt to the effects of climate change;*
  - (b) relate new housing development to employment services, transport and infrastructure. To achieve this a defined Settlement Hierarchy, itself based on sustainability principles, has been created and applied;*

- (c) achieve a local balance between employment opportunities, housing growth and environmental capacity;*
- (d) ensure the provision of the appropriate infrastructure in order to support existing and proposed communities;*
- (e) give priority to re-using previously developed land and buildings in and around built-up areas, where possible ahead of greenfield sites;*
- (f) promote the use of sustainable methods of construction, including materials, energy efficiency, water recycling, aspect etc;*
- (g) reduce the overall need to travel but where travel is necessary, to better manage the transport network to enable it to function efficiently;*
- (h) enable a healthy economy, notably in the town centres and rural areas, taking advantage of regeneration opportunities where appropriate;*
- (i) enhance accessibility to services;*
- (j) conserve and enhance the areas natural historic and built environment;*
- (k) maintain and enhance a sense of place; and*
- (l) create and promote inclusive and sustainable communities in both urban and rural locations.*

**Footnote: 'Built-up areas' in this context means settlements with physical limits boundaries.**

- 3.2.26 Policy SP1A – Presumption in Favour of Sustainable Development, states that When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 3.2.27 Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
- 3.2.28 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
  - Specific policies in that Framework indicate that development should be restricted\*.

**Footnote: \*For example those policies relating to sites protected under the Birds and Habitats Directives (NPPF paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space; and Area of Outstanding Natural Beauty; Heritage Coast; designated heritage assets and locations at risk of flooding or coastal erosion.**

- 3.2.29 Strategic Policy SP2 sets out the proposed housing numbers and overall distribution for the district, making provision for at least 7,900 new homes in the period 2010 to 2027. Its states that

land for new homes will be distributed in accordance with the Settlement Hierarchy (SP19). The policy also outlines the Council's intention to undertake an early review of the Core Strategy, commencing with the publication of an Issues and Options Report by 2015 at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the National Planning Policy Framework.

3.2.30 In terms of housing distribution, the Core Strategy directs 19% of the total housing growth (1,520 homes over the plan period or 103 dpa) to the 'Towns'. Woodbridge is identified as one of five towns within the settlement hierarchy set out in Policy SP19. Whilst the proposed site falls outside the settlement boundary for Woodbridge, it is considered that additional land outside the settlement boundaries of towns such as Woodbridge will be required to facilitate housing growth. Gladman also suggest that these second tier Towns are key sustainable locations to facilitate any further housing growth that may be required following the imminent review of the Councils fully objectively assessed housing need.

3.2.31 The Core Strategy does not allocate sites for development; SCDC suggest that is the role of the site specific allocations development plan documents which will follow. Work on these documents (Felixstowe Area Action Plan and the Site Allocations and Area Specific Policies Local Plan document) is not due to complete for some time. In the meantime, the Council has only one outstanding housing allocation remaining from the "old" Local Plan for around 75 dwellings at Rendlesham. Other than that it is primarily reliant on outstanding planning permissions for its five year supply, as other large sites previously allocated or identified, are built out.

3.2.32 SCDC's approach to the determination of planning applications during this interim period is set out in paragraph 3.33 of the Core Strategy which states:

*"In the short term however, between adoption of the Core Strategy and the adoption of the subsequent site allocations document (2015), larger housing sites will need to be brought forward to achieve a five year housing land supply. These sites also technically comprise "windfall" but will still be expected to accord with the principles, scale and distribution of development set out in this Core Strategy. In essence, they are sites which, but for timing, would have been allocated in the normal way."*

3.2.33 It is evident that SCDC require windfall sites, such as that proposed, to come forward for development to facilitate the delivery of housing to meet their current housing requirement and five year supply. A large number of additional windfall sites will therefore be required to meet their full OAN.

3.2.34 Policy SP26 sets out the strategy for Woodbridge, to balance opportunities with the acknowledged physical and environmental constraints, (notably the Deben Estuary with its nature conservation and landscape designations to the east, the A12 to the west, areas at risk from flooding, and its high quality historic built environment) in order to maintain and enhance its roles as the principle market town within the district, an employment centre and a tourist destination. It suggests that further significant expansion of Woodbridge (and Melton) will be sympathetically considered having regard to the local character and key physical thresholds.

3.2.35 Strategic Policy SP9 – 'Retail Centres' states:

*"Emphasis within the district will be on maintaining and enhancing the viability and vitality of existing retail centres, and making proper provision for new forms of retail distribution..."*

- 3.2.36 Policy SP9 identifies Woodbridge as a Town Centre, but does not specifically reference any sequential approach to site selection – therefore, paragraph 24 of the Framework applies.
- 3.2.37 The accompanying text to Policy SP9 goes on to state:  
*“No need has been proven requiring a new retail centre to be provided. However, district/local centre provision will be required to serve new housing development and where appropriate to support new business provision” (para. 3.102)*
- 3.2.38 Policy SP9 does not identify Martlesham Village as a retail centre, although it is designated as a Key Service Centre in the Settlement Hierarchy Classification (Table 4.1).
- 3.2.39 Table 3.7 (Town Centre Floorspace Capacity – Projections from Retail Study) identifies capacity for 840m<sup>2</sup> net convenience floorspace in Woodbridge by 2025. The application is accompanied by a Sequential Assessment undertaken by NLP, which addresses this policy.
- 3.2.40 Strategic Policy SP15 – ‘Landscape and Townscape’ aims to protect and enhance the various landscape character areas within the District. Many of the towns and villages in the District are of distinctive historical and architectural value, as well as of landscape value and character. The Council will seek to enhance and preserve these attributes and the quality of life in the generality of urban areas. This strategy extends to towns and villages where sites, gaps, gardens and spaces make an important contribution to a particular location in their undeveloped form; or more generally avoided where development in these locations would lead to coalescence. The location of such sites will be designated through the Site Allocations and Area Specific Policies, Area Action Plans or Neighbourhood Development Plan Documents. Until then, those sites currently allocated under Saved Policy AP28 in the Suffolk Coastal Local Plan (incorporating 1st and 2nd Alterations) will continue to be protected.
- 3.2.41 The proposed site does not fall within an area protected by Saved Policy AP28. Whilst it does lie within an area protected by other landscape policies from the Saved Local Plan, as outlined previously, Gladman believe that such policies are inconsistent with the Framework, are significantly time expired, and should be given limited weight due to the Council’s absence of a five year housing land supply.
- 3.2.42 Policy DM2 sets out the affordable housing requirements on residential sites suggesting that 1 in 3 units is to be affordable.
- 3.2.43 In accordance with the Council’s adopted policy, the proposed development of up to 215 units will include 33% affordable units. It is also a significant benefit of the scheme and would address the identified local housing need within Woodbridge.
- 3.2.44 Policy DM27 seeks to ensure that new development protects and enhances both biodiversity and geodiversity by minimising potential impacts and maximising opportunities for enhancement and conservation. Development proposals that would cause a direct or indirect adverse effect (alone or combined with other plans or projects) to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species, will not be permitted unless:



*“(i) prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development; or*

*(ii) with regard to internationally designated sites that the exceptional requirements of Reg. 62 of the Conservation of Habitats and Species Regulations 2010 (as amended) relating to the absence of alternative solutions and Imperative Reasons of Overriding Public Interest have been met.”*

3.2.45 The Deben Estuary Special Protection Area (SPA)/ Ramsar site is located to the south and west of the proposed development site, approximately 350m away at its closest point.

3.2.46 A report entitled ‘Information to Enable a HRA of the Impacts on the Deben Estuary’ produced by Ecology Solutions accompanies this application. Detailed consideration has been given in this report to the potential significant effects arising in relation to the Deben Estuary SPA/Ramsar site. In summary, in the opinion of Ecology Solutions, following appropriate and detailed assessment, the development proposals would not result in a significant adverse effect on the SPA/Ramsar site either alone or in combination with other plans or projects, and that as such the tests contained within Regulation 61 (1) of the Habitats Regulations would not be failed and that there is no need therefore to undertake an Appropriate Assessment.

3.2.47 The Core Strategy identifies a number of additional policies which aim to protect and enhance the environment:

- Strategic Policy SP12 – Climate Change - The District Council will contribute towards the mitigation of the effects of new development on climate change by ensuring development minimises the use of natural resources; encouraging and promoting schemes which create renewable energy; minimising the risk of flooding and ensuring appropriate management of land within flood plains; and improving the process of estuary and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions.
- Strategic Policy SP14 – Biodiversity and Geodiversity will be protected and enhanced using a framework based on a network of:
  - Designated sites;
  - Wildlife corridors and links;
  - The rivers, estuaries and coast;
  - Identified habitats and geodiversity features;
  - Landscape character areas; and
  - Protected species.
- Development Management Policy DM21 – Design: Aesthetics. Proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted. Development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live, work and visit.

3.2.48 *‘Planning permission will be granted for new development if the following criteria are met:*

- *The design and layout of the development provides and maintains safe and convenient access for people with disabilities;*
- *New development generally makes adequate provision for public transport, cars, cycling, garages, parking areas, access ways, footways, etc in a manner whereby such provision does not dominate or prejudice the overall quality of design and appearance;*
- *Provision is made to enable access, turning and manoeuvring for emergency vehicles and the collection of waste; and*
- *Proposals for development take into account the need for crime prevention. Particular attention will be paid to such features as secure design, natural surveillance, adequate lighting and visibility. Proposals aimed at reducing crime within existing development areas will be supported provided that they are not in conflict with the objectives of other plan policies.*

3.2.49 *The District Council will also support and strongly encourage water conservation measures such as grey water systems, permeable soakaways and water efficiency devices'.*

- Development Management Policy DM23 – Residential Amenity states that when considering *'the impact of new development on residential amenity, the Council will have regard to the following'*:
  - *privacy/overlooking;*
  - *outlook;*
  - *access to daylight and sunlight;*
  - *noise and disturbance;*
  - *the resulting physical relationship with other properties;*
  - *light spillage, air quality and other forms of pollution; and*
  - *safety and security.*

3.2.50 *Development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development.*

- Development Management Policy DM26 – Lighting states that the District Council will seek to minimise light pollution. *'Applications for development requiring or likely to require external lighting should include details of lighting schemes. This should include position, height, aiming points, lighting levels and a polar luminance diagram. Applicants will need to satisfy the District Council that:*
  - *The proposed lighting scheme is the minimum needed for security, working purposes, recreational or other use of the land;*
  - *It is designed so as to minimise pollution from glare and light spillage, particularly to residential and commercial areas, areas of nature conservation importance, and areas whose open and landscape qualities would be affected; and*
  - *There will be no glare or light spillage onto highways which could dazzle, distract or disorientate road users using them.*

*In order to prevent unnecessary intrusion into the countryside, or the effect on residential amenity, the District Council may seek to control the days and times of use of lighting (excluding street lighting).'*

### **3.3 NATIONAL PLANNING POLICY**

#### **National Planning Policy Framework (The Framework)**

- 3.3.1 The Framework was published on 27th March, 2012 to provide national guidance on planning policy. The Framework intended to guide the planning decision making process.
- 3.3.2 The Framework identifies a key strategy which aims for the planning system to contribute to the delivery of sustainable development. Sustainable development is defined as having three dimensions: Environmental, Social, and Economic<sup>1</sup>.
- 3.3.3 As part of sustainable development positive improvements should be made to the natural, built and historic environment. In doing so the quality of life of residence should be improved<sup>2</sup>. When decision planning applications and plan making the local circumstances need to be considered, sustainable development can be achieved<sup>3</sup>.
- 3.3.4 A presumption in favour of sustainable development is at the heart of the Framework. Paragraph 14 explains:
- “there is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. ...For decision-taking this means:*
- *Approving development proposals that accord with the development plan without delay; and*
  - *Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
    - *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; or*
    - *specific policies in this Framework indicate development should be restricted.”*<sup>4</sup>
- 3.3.5 Section 6 of the Framework outlines the need to significantly boost the housing supply. The Framework explains that the evidence base of the Local Plan meets the full objectively assessed need for both market and affordable housing. Local Planning Authorities must identify a deliverable housing land supply capable of delivering a five year supply of housing against their OAN requirement<sup>5</sup>. It is stated within paragraph 49 that:
- 3.3.6 “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”<sup>6</sup>
- 3.3.7 Design issues are considered within section 7, and identifies a positive approach that should achieve high quality of inclusive design:

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<sup>1</sup> National Planning Policy Framework, Paragraph 7

<sup>2</sup> National Planning Policy Framework, Paragraph 9

<sup>3</sup> National Planning Policy Framework, Paragraph 10

<sup>4</sup> National Planning Policy Framework, Paragraph 14

<sup>5</sup> National Planning Policy Framework, Paragraph 47

<sup>6</sup> National Planning Policy Framework, Paragraph 49

*"It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes."*<sup>7</sup>

3.3.8 Conserving the natural environment is considered within section 11 of the Framework. It is stated that the planning system should contribute and enhance the natural environment. It is stated that a biodiversity net gain should be provided where possible<sup>8</sup>.

3.3.9 Conserving and enhancing heritage assets are considered with section 12. Paragraph 134 states:  
*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use."*<sup>9</sup>

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<sup>7</sup> National Planning Policy Framework, Paragraph 57

<sup>8</sup> National Planning Policy Framework, Paragraph 109

<sup>9</sup> National Planning Policy Framework, Paragraph 134