

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

MUNICIPAL YEAR 2014-215

**DEVELOPMENT CONTROL
COMMITTEE
19 FEBRUARY 2015**

**REPORT OF: SERVICE
DIRECTOR PLANNING**

	Agenda Item No. 6
APPLICATIONS RECOMMENDED FOR REFUSAL	

1. PURPOSE OF THE REPORT

Members are asked to determine the planning applications outlined in Appendix 1.

2. RECOMMENDATION

To refuse the application subject to the reasons outlined in Appendix 1.

1. Application No: 14/1324 - Outline application for residential development of 35 dwellings including 10 affordable housing units (re-submission of 12/1144/13), Land at Elwyn Street, Coedely, Tonyrefail.

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APPLICATIONS RECOMMENDED FOR REFUSAL

APPLICATION NO: 14/1324/13 (PB)
APPLICANT: Triseren Investments Limited
DEVELOPMENT: Outline application for residential development of 35 dwellings including 10 affordable housing units (re-submission of 12/1144/13)
LOCATION: LAND AT ELWYN STREET, COEDEL, TONYREFAIL
DATE REGISTERED: 13/10/2014
ELECTORAL DIVISION: Tonyrefail East

RECOMMENDATION: REFUSE

REASONS:

The proposal is for outline planning permission for residential development on land outside settlement limits as defined in the LDP. Justification for the development is offered for a number of reasons, including the provision of an element of needed affordable housing, but none is particularly persuasive and sufficient to override the planning policy aims of protection of the countryside and the direction of new housing development to sustainable locations. Also, the proposal would overload the Waste Water Treatment Works.

APPLICATION DETAILS

Planning permission is sought for the residential development of land at the Riverside, Elwyn Street, Coedely. The application is in outline with all matters of detail reserved for future consideration. The proposal is for the development of 35 dwellings which the application states will include 10 affordable housing units. The application is a re-submission following the Council's refusal of planning permission for a similar development on this site on 9 October 2013 (application ref: 12/1144).

An indicative layout plan and Design and Access Statement accompany the application. The proposed development would be located in a new cul de sac to be constructed to adoptable standards off Elwyn Street. The development would comprise a mix of 7 bungalows, 20 houses and 8 single-person apartments. The Design and Access indicates that 2 of the bungalows and all of the apartments would be offered for rental by a housing association.

The proposed bungalows would be located together at the western end of the site and each would measure from 7m to 11m in depth, 9m to 11m in depth and 5.5m to 6.5m in height to the ridge. The remaining houses and apartments would be two storeys high in blocks ranging from 4.25m to 15.60m wide, 8.50m to 9.50m deep and 8.00m to 9.50m high to the roof ridge.

Each of the dwellings would be laid out with off-street parking and a private garden. A small informal public amenity space is indicated to be laid out near the entrance to the site.

The application is accompanied by a Design and Access Statement and an Extended Phase 1 Habitat Survey.

SITE APPRAISAL

The application site has an area of 0.91 hectare and comprises gently sloping and tiered made-up land located immediately between the River Ely and Elwyn Street. The land slopes steeply along the boundary with the river. The eastern part of the site is in use as caravan storage facility, which also extends onto adjoining land towards the roundabout off the A4119. The smaller western part is vacant. The eastern and western parts of the site are effectively divided by an existing gated access road (though not in uses) off Elwyn Street. To the north-east of the application site lies the residential area of Coedely, while to the east of the application site lies countryside that extends south of Coedely.

PLANNING HISTORY

12/1144	Land off Elwyn Street, Coedely. Tonyrefail	Residential development (32 dwellings)	Refused 9/10/13
12/0294	Forest View, Elwyn Street, Coedely, Tonyrefail, Porth	Variation of Conditions 2 & 3 of planning permission 11/0142 (Change of use of land to provide additional secure caravan storage (phase 2)) - Amended highway access.	Approved 30/10/12
11/0142	Forest View, Elwyn Street, Coedely, Tonyrefail, Porth	Proposed change of use of land to provide additional secure caravan storage (phase 2) including changes to highway access, boundary fencing and landscaping to the existing and additional site areas.	Approved 17/05/11
10/0913	Forest View, Elwyn Street, Coedely, Tonyrefail, Porth.	Change of Use of land to caravan storage , erection of gatehouse building and boundary fence and alterations to access.	Approved 29/11/10
10/0910	Forest View, Elwyn Street,	Retention of offices.	Approved 30/11/10

	Coedely, Tonyrefail, Porth.		
10/0214	Woodland Business Centre, Elwyn Street, Tonyrefail, Porth	Reinstatement of highway access.	Approved 15/06/10
09/1044	Woodland Business Centre, Elwyn Street, Tonyrefail, Porth	Reinstatement of highway access.	Refused 19/11/09
08/1274	Woodlands Business Centre, Elwyn Street, Coedely	Retention of offices with associated car parking and flood lighting (Resubmission)	Withdrawn 27/07/09
07/0349	Woodlands Business Centre, Elwyn Street, Tonyrefail, Porth	Retention of offices and base with associated car parking and flood lighting and construction of new office building.	Refused 01/07/08
06/0354	Woodlands Business Centre, Elwyn Street, Coedely, Porth	2 signs attached to building and 1 free- standing pylon sign as enclosed.	Approved 15/05/06
05/1880	Land adjacent to Woodlands Business Centre, Elwyn Street, Coedely, Tonyrefail	Proposed vehicle workshop and offices together with associated vehicle display and parking areas	Refused 19/12/06 Appeal: ALC 27/06/07
05/1443	Vans Direct (Fiat) Woodland Business Centre, Elwyn Street, Porth	Internal sign	Approved 10/10/05
04/2142	APH Motors & Land Adjacent To Woodlands Business Centre, Ely Valley Road,	Vehicle showroom workshop and offices.	Refused 30/06/05

	Coedely, Tonyrefail		
04/1131	Field adjacent to Find it-Fund it Vehicle Consultants Ltd, Ely Valley Road, Coed Ely.	Construction of vehicle display and parking area.	Withdrawn 03/02/05
04/1641	Woodlands Business Centre, Elwyn St, Coedely, Tonyrefail, Porth.	Proposed additional office accommodation.	Approved 08/04/04
04/0296	Woodlands Business Centre, Elwyn St, Coedely, Tonyrefail, Porth.	Proposed additional office accommodation.	Approved 08/04/04
03/1641	Ely Valley Garage, Ely Valley Rd, Coedely, Tonyrefail, Porth.	Proposed environmental improvements.	Approved 01/03/04
03/1092	Coedely Garage, Ely Valley Rd, Coedely, Tonyrefail.	Proposed Mezzanine Floor internally & additional windows to existing buildings, to facilitate Change of Use of building into offices/showroom.	Approved 30/12/03
93/0470	Ely Valley garage, Coedely, Tonyrefail.	New garage/showroom to replace existing garage/showroom.	Approved 02/08/93
86/0908	Land adjacent to Ely Valley garage	Open air market Wednesday 9-4	Approved 22/09/86
83/0359	Opposite 20 Elwyn Street, Tonyrefail	Garage	Approved 19/04/83
80/0215	Forest View, Elwyn Street, Tonyrefail	Extension	Approved 23/04/80

80/0016	Ely Valley Garages, Coedely.	Conversion of part of the garage to a snack bar.	Approved 11/03/80
76/1458	Wasteland Opposite Elwyn Street, Tonyrefail	Garage	Approved 15/03/77
76/0366	Land adjacent to Ely Valley garage	Portable accommodation unit	Withdrawn 08/10/79

PUBLICITY

Neighbouring properties notified by letter, site notices displayed and a press notice published.

Letter of objection received from a neighbouring resident and from Tonyrefail & District Community Council on the following grounds:

- Access and Egress at site would be a hazard to highway users
- Increase traffic flows and associated nuisance and highway safety hazards
- Concerns over maintenance and viability of pumping station in the development
- Increased pressure on local education and health services
- Ground stability and contamination risks
- Impact on ecological interests and protected trees
- Drainage issues
- Outside settlement boundary

CONSULTATIONS

Transportation Section - no objection subject to conditions and the developer and other interested parties entering into a Section 106 Agreement to make a financial contribution of £5000 towards the TRO for traffic management in reducing the speed limit from 40mph to 30mph in the vicinity of the site access along Elwyn Street.

Land Reclamation and Engineering - recommends drainage conditions in the event of planning permission being granted and advises that the River Ely is designated a Main River therefore any drainage discharge to it will require a Flood Defence Consent.

Public Health and Protection - recommends appropriate conditions in relation to remediation of potential contamination from previous use of the site for disposal of colliery waste. Also offers advice and conditions in relation to mitigation of construction activity noise, dust, disposal of waste, and artificial lighting.

Housing Strategy - no objection. The proposed affordable housing mix responds to the housing need identified in the Local Housing Market Assessment.

Education Services - although this is a relatively small development, the local English Medium Primary school is already full and would have problems accommodating any further pupils. A development of 35 dwellings would generate approximately 11 children of Primary school age so would require a contribution towards additional school places.

Natural Resources Wales - no reply received.

Parks and Countryside Section - offers no objection to the proposed development though expresses the view that the key concerns is to try and ensure the proposal is designed to not materially worsen (and hopefully improve) the impacts of the land filled area on the closely adjacent River Ely which is part of SINC 92. Appropriate wildlife protection, tree protection, water pollution control, and landscaping conditions are recommended.

Welsh Water / Dwr Cymru - objects to the proposed development as it would overload the Waste Water Treatment Works. No improvements are planned within DCWW's Capital Investment Programme, therefore any development prior to improvement being made is considered premature.

Wales & West Utilities - no objection though indicates the position of its gas supply infrastructure in relation to the proposed development.

Glamorgan Gwent Archaeological Trust - no objection.

POLICY CONTEXT

Rhondda Cynon Taff Local Development Plan

The application land is situated outside any settlement boundaries and within Sandstone resources safeguarding area.

Policy CS2 emphasises sustainable development that benefits the whole plan area, and focuses development within settlement boundaries.

Policy CS10 provides for the safeguarding of mineral resources.

Policy AW1 defines the housing land supply, to be met by specified ways that do not include settlements without defined boundaries.

Policy AW2 proposes development of non-allocated sites in sustainable locations, which are those within settlement boundaries.

Policy AW3 provides for 100% affordable housing schemes on the outside edge of settlement boundaries.

Policy AW4 provides for planning obligations to be sought where necessary to make proposals acceptable.

Policy AW5 and AW6 give general criteria for new development.

Policy AW8 protects the natural environment from inappropriate development, and requires demonstration of measures for protection, management and mitigation of potential impacts where appropriate.

Policy AW10 states that proposals will not be permitted where they would cause or result in a risk of unacceptable harm to health and / or local amenity because of a range of factors, including land contamination.

Policy AW14 requires the protection of sandstone resources.

Policy SSA11 sets a minimum density of 35 dwellings per hectare (dph) and gives criteria for lower densities.

Policy SSA12 seeks 20% affordable housing provision.

Policy SSA13 promotes development within settlement boundaries.

SPG

Design & Placemaking

Delivering Design & Placemaking - Access, Circulation & Parking.

Planning Obligations – CIL version

National Planning Policy

Planning Policy Wales 7

Para. 3.1.5. The local planning authority should have good reasons if it approves a development which is a departure from the approved or adopted development plan.

Para. 4.9.1. Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites. The Welsh Government recognises that not all previously developed land is suitable for development, for example, because of its location.

Para. 9.1.1. Preference for redevelopment of previously developed land for housing.

Para. 9.1.2. Sustainable residential environments: good access to public transport, walking and cycling; good access to employment, retail and other services.

Para. 9.2.3. There should be a 5-year housing land supply.

Para. 9.2.14. Affordable housing need is a material consideration.

Para. 9.3.1 New housing should be well integrated with and connected to the existing pattern of settlements.

Para. 9.3.6 New house building and other new development in the open countryside, away from established settlements, should be strictly controlled.

Sections 13.5 to 13.7 deal with ground contamination.

REASONS FOR REACHING THE RECOMMENDATION

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

Furthermore, applications that are not in accordance with relevant policies in the plan should not be allowed, unless material considerations justify the grant of planning permission.

Main issues:

- The principle of the proposal development in the context of local planning policies and planning history of the site
- Accessibility and highway safety
- Drainage
- Ecology and trees
- Character and appearance
- Other miscellaneous issues

The principle of the proposal development in the context of local planning policies and the planning history of the site.

The application site lies entirely outside the settlement boundaries of Tonyrefail and Coedely where new residential development is strictly controlled unless adequately justified as an exception in an otherwise unsustainable location. The LDP settlement strategy identifies Coedely as an area without a settlement boundary in view of the lack of facilities in the area. Coedely benefits from a bus service, proximity to an 'A' road and a large unused employment land allocation, but lacks any school, place of worship, post office, shop, surgery, public house or library.

Coedely currently includes 89 houses on an area of 1.8 hectares, built between OS map editions of 1900 and 1921. The proposals would increase the dwelling numbers by 40% and the area by 50%. The application site is separated from Coedely by Elwyn Street, so it is not well-integrated with existing development as required by PPW 9.3.1. The gap between the application site and the nearest settlement boundary at Tylcha Fach is about 620 metres. Therefore, it is not possible to consider the site as adjoining any settlement.

The Design and Access Statement (DAS) that accompanies the application acknowledges the site lies outside settlement boundaries, but provides reasons why it should be considered to be a sustainable location.

- (a) Bus service: this does provide non-car access to services in Talbot Green and Tonyrefail but this is not a "range" of sustainable transport modes. Walking

and cycling are not practical options given the distance to central Tonyrefail and Talbot Green.

- (b) Community centre: whilst acknowledged as being an active facility, the centre does not make up for the lack of other facilities in Coedely.
- (c) Cwmlai Primary School is only 1km away: the planning objective is to minimise travel need by meeting housing need as close as possible to facilities. There are better located sites to meet housing need in Tonyrefail.
- (d) brownfield land: part of the application site is used for caravan storage. However, (i) PPW 4.9.1 makes it clear that some previously developed land will not be suitable for development due to its location, and (ii) the application site has not had buildings on it before. Therefore, the preference for re-use of previously developed land has limited weight.
- (e) Generous affordable housing provision: in consultation with Strategic Housing it is acknowledged that the proposals would contribute to meeting an identifiable affordable housing need. The proposed percentage is 29%, comfortably in excess of the requirement of policy SSA 12. However, the application is in outline and there is no evidence of the proposal being linked to a registered social landlord, such as a housing association, or a clear explanation as to the mechanism that will ensure the dwellings will be sold or rented as affordable homes and remain affordable in perpetuity. Besides, the proposal does not comply with Policy AW 3 as the site does not adjoin a settlement boundary.
- (f) Need for bungalow and starter homes: it is not a specific objective to deliver bungalows or starter homes, so this is not a weighty consideration in favour of the proposals.
- (g) Housing land supply: this is a potentially weighty positive consideration. If as stated, development on the application site would be deliverable within 5 years, the contribution of 35 units would be significant. However, the site is occupied and there is no developer involved in the application. Therefore, it is considered doubtful that an outline permission would result in completions within 5 years.

In summary, the proposed development is in a location without good access to services and amenities, a significant distance from the nearest settlement and unlikely to make a significant contribution to the 5 year housing land supply. Therefore, the proposal amounts to unjustified residential development outside settlement limits and in an unsustainable location, and for these reasons conflicts with LDP Policies CS 2, AW1 and AW2 and AW 3. Moreover, outline planning permission for a very similar development on this site was refused planning permission for these reasons as recently as 9 October 2013 (application reference: 12/1144).

Accessibility and highway safety

LDP Policy AW 5 requires new development to be accessible by a range of sustainable transport modes; to maximise the opportunities to reduce dependence

on cars; to have safe access to the highway network and not cause or exacerbate traffic congestion; and provide adequate car parking in accordance with Council's Supplementary Planning Guidance (SPG). LDP Policy AW 6 similarly supports development proposals that have a high level of connectivity and accessibility by a range of modes of sustainable transport.

The proposed access to serve the development is to be taken off the Ely Valley Road at a point where there is an existing access to part of the caravan storage site. The indicative layout plan of the development proposes and upgraded access to an adoptable standard complete with adequate vision splays and footways. The Transportation Section has examined the indicative proposals and they have expressed reservations that on-street parking around the access by local residents and visitors might prejudice highway safety and free flow of traffic. However, subject to conditions (amongst others) covering the implementation of a traffic management scheme and design of the access, they have offered no objection. The Transportation Section also requires the developer to enter into a legal agreement to make a contribution of £5,000 towards the Traffic Order for traffic management in reducing speed limits.

Therefore from a solely highway safety perspective the proposal is capable of providing an adequate access and for its own parking needs. To this extent the proposal satisfies LDP Policy AW5.

From an accessibility perspective, as noted earlier in this report, the application site is well outside any settlement boundaries and located a considerable distance from the nearest key services and facilities in Talbot Green to the south and Tonyrefail to the north. Although the site is on a bus route, the options for cycling and walking are limited due to the distances involved. The development therefore will lack connectivity and accessibility to a range of sustainable transport modes and will be highly car-dependent. To this extent and for these reasons the proposal fails to satisfy LDP Policies AW 5 and AW 6.

Drainage

Local Development Plan Policy AW 10 permits proposals where they would not cause or result in a risk of unacceptable harm to health and / or local amenity because of a range of factors, including drainage. In this regard it is important to note that the application proposal has attracted an objection from Dwr Cymru Welsh Water (DCWW) for reasons that the development would overload the Waste Water Treatment Works. No improvements are planned within DCWW's Capital Investment Programme, therefore any development prior to improvement being made is considered premature. Ordinarily, this is matter that could be resolved by the applicant undertaking investigations into the capacity of the network and possibly by agreement to contribute towards the acceleration of the necessary capital works. But, in view of the fundamental concerns with this proposal for other reasons, these options have not been discussed with the applicant as they might involve

considerable wasted effort and resources. Nevertheless, the proposal fails to satisfy LDP Policy AW10.

Ecology and trees

Although in use predominantly for the storage of caravans the application land lies adjacent to the River Ely and is fringed by numerous trees that are the subject of a Tree Preservation Order. The River Ely and its wooded banks are also part of the Site of Importance for Nature Conservation (Sinc) 92. In respect of the ecological interests of the site and adjacent habitat, the application is accompanied by an Ecological Assessment.

In essence, much of the application site is a land-filled plateau which has been created on the banks of the Ely River. The ecological impacts of that were experienced a number of years ago - what has been left is a fairly ecological barren hard core surface with some remnant hedgerow/scrub. The ecological assessment of the land-filled area which is subject to the housing development therefore suggests minimal ecological impact, with just the need for some precautionary measures to consider nesting birds, potential reptile habitat, etc during site clearance. To this extent the findings and recommendations of the Ecological Assessment are accepted.

However, there are ecological concerns regarding this application. The key concern is to try to ensure that this development is designed to not materially worsen (and hopefully improve) the impacts of the land-filled area (and its current operation) on the closely adjacent River Ely. The River Ely immediately adjacent to the land-fill planning application site is part of SINC 92. The Ecology report highlights the problems of Japanese Knotweed and Himalayan Balsam infestation of this section of river corridor, plus issues of land-fill tipping and litter issues along the length of this section of River. However, despite these problems, the ecology report highlights the high potential of the river as bat and otter habitat, and the corridor (despite the invasive plants and land-fill) still supports important area of wet woodland. It is known from work undertaken for a Council drainage scheme in Coedely that Otter activity is very high in this section of river (with as high potential for an Otter holt somewhere on the Coedely/Tonyrefail section of River) and that the dark, wet woodland and river will support important bat habitat.

The question is how does the Council ensure that this development does not lead to increased light pollution or litter disposal into the adjacent river corridor? Also, how does the Council ensure that materially this housing development is designed with some meaningful protection for the adjacent River Ely? The submitted ecology report suggests the implementation of a tall close bordered fence which can prevent both physical disturbance and light pollution, but the extent to which that solution fits with urban design aspirations is questionable? Provision of a buffer strip between the River and the housing development might be a better. These are matters that would require careful consideration at the detailed planning stage in the event of the outline

permission being granted. In the meantime there is no overriding objection to the application on grounds of its consequences for ecological interests, which are capable of being safeguarded by appropriate wildlife and tree protection conditions and design and layout amendments at the detailed planning stage. The proposal therefore satisfies LDP policy AW8.

Character and appearance

LDP Policy AW5 requires new development to have an acceptable impact on the character and appearance of the site and surrounding area. Furthermore, Policy AW6 supports development proposals with a high standard of design, appropriate to the local context, and an efficient use of land. In essence, current planning policy places design at the heart of the planning process and seeks to ensure that proposals for new development respond to principles of good design. In this regard, and although the proposal is in outline, the applicant's Design and Access Statement (DAS) sets out that the proposed development will consist of mixture of bungalows and houses similar in scale, appearance and design to many other houses in the Tonyrefail area. The DAS states the development would be laid out in a new street in a regular pattern reflective of the site constraints and opportunities, and similar to the layout and density of both old and new developments in the local area.

As the application is in outline with all matters reserved for subsequent approval the precise detail of the development is not available for consideration until that stage. In the meantime, it is considered that the indicative layout would provide for reasonably well-laid out and legible residential development that maximises the use of the site, safeguards privacy and amenity, and reserves an area of land for public open space. Whilst the bungalows proposed are not characteristic of local development in the immediate surrounding area, it is acknowledged they represent a specific design response to the perceived need for this type of dwelling in the locality and a means of justifying the proposal in this location.

In summary and notwithstanding the other material issues, it is considered the proposed development would not be unduly harmful to the character and appearance of the area, therefore satisfies LDP policy AW 5 in this regard.

Other miscellaneous issues

Other miscellaneous considerations in this case relate to the consequences of the proposals for flood risk and contamination of the site, and for the safeguarding of mineral (specifically Sandstone) resources on the land.

In terms of the first of these matters the application site lies in close proximity to the River Ely though it is understood that only a very limited part of the land is identified as lying within an area at risk of flooding. Besides, the indicative layout plan does not propose any built development on that part of the site therefore there is no objection to the application from this perspective.

The remediation of any contamination arising from current and past land uses are matters capable of being addressed by appropriate conditions to planning permission if the proposals were otherwise acceptable.

Finally, the application site lies in an area of known sandstone resources, the extraction of which is safeguarded from unnecessary hindrance and sterilisation under LDP Policy AW14. The identification of safeguarding areas for minerals does not carry a presumption that planning permission will be granted for extraction as other issues might prevail. Given the close proximity of the application site to an ecologically sensitive river corridor and to neighbouring residential dwellings, and the fact that Pennant Sandstone covers approximately 70% of the County Borough, it would seem unlikely that mineral extraction is realistic at this location and its sterilisation to other development will not significantly diminish the resource. Therefore the proposal is not in conflict with LDP Policy AW14.

Community Infrastructure Levy (CIL) Liability

The Community Infrastructure Levy (CIL) was introduced in Rhondda Cynon Taf from 31 December 2014. As planning permission first permits development on the day of the final approval of the last of the reserved matters CIL is not payable at outline stage, but will be calculated for any reserved matters or full applications.

Conclusion and Recommendation

In conclusion and taking into account all of the above into consideration, the proposal amounts to unjustified residential development outside settlement limits and in an unsustainable location, as it would not be accessible to the local and wider community by a range of sustainable modes of transport. Also, it would overload the Waste Water Treatment Works in the locality. For these reasons the proposal conflicts with LDP Policies CS2, AW2, AW3, AW5, AW6 and AW10.

RECOMMENDATION: Refuse

1. The proposal is contrary to Rhondda Cynon Taf Local Development Plan policies CS2, AW2, and AW3 as it is unjustified residential development outside settlement limits and in an unsustainable location, and contrary to policies AW 5 and AW 6 in that the development would not be accessible to the local and wider community by a range of sustainable modes of transport.
2. The proposal conflicts with Rhondda Cynon Taf Local Development Plan Policy AW10 as it would overload the Waste Water Treatment Works and no improvements are planned within Dwr Cymru Welsh Water's Capital Investment Programme, therefore any development prior to improvement being made is considered premature.

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LOCAL GOVERNMENT ACT 1972

as amended by

LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

LIST OF BACKGROUND PAPERS

DEVELOPMENT CONTROL COMMITTEE

19 FEBRUARY 2015

REPORT OF: SERVICE DIRECTOR PLANNING

REPORT

**APPLICATIONS RECOMMENDED
FOR REFUSAL**

OFFICER TO CONTACT

**MR. J. BAILEY
(Tel: 01443 425004)**

See Relevant Application File