



### Planning Committee

Report of Head of Planning and Building Control on 20 June 2022

Plans List Item Number: 7

#### Reason for bringing to committee

Non-determination appeal lodged (costs appeal from the applicant to follow). Officers are therefore seeking a resolution from Members of this Planning Committee on how they would have otherwise determined this application. The resolution will be forwarded to the Planning Inspectorate and will form part of the Council's appeal documents.

#### Application Details

**Location:** CAR PARK AT FORMER WALSALL WOOD LIBRARY, COPPICE ROAD, WALSALL WOOD, WALSALL, WS9 9BL

**Proposal:** FULL APPLICATION FOR 4 NEW SEMI-DETACHED 2 BEDROOM DWELLINGS WITH ASSOCIATED PARKING AND LANDSCAPING

**Application Number:** 21/0048

**Case Officer:** Ann Scott

**Applicant:** RH Development (Midlands) Ltd

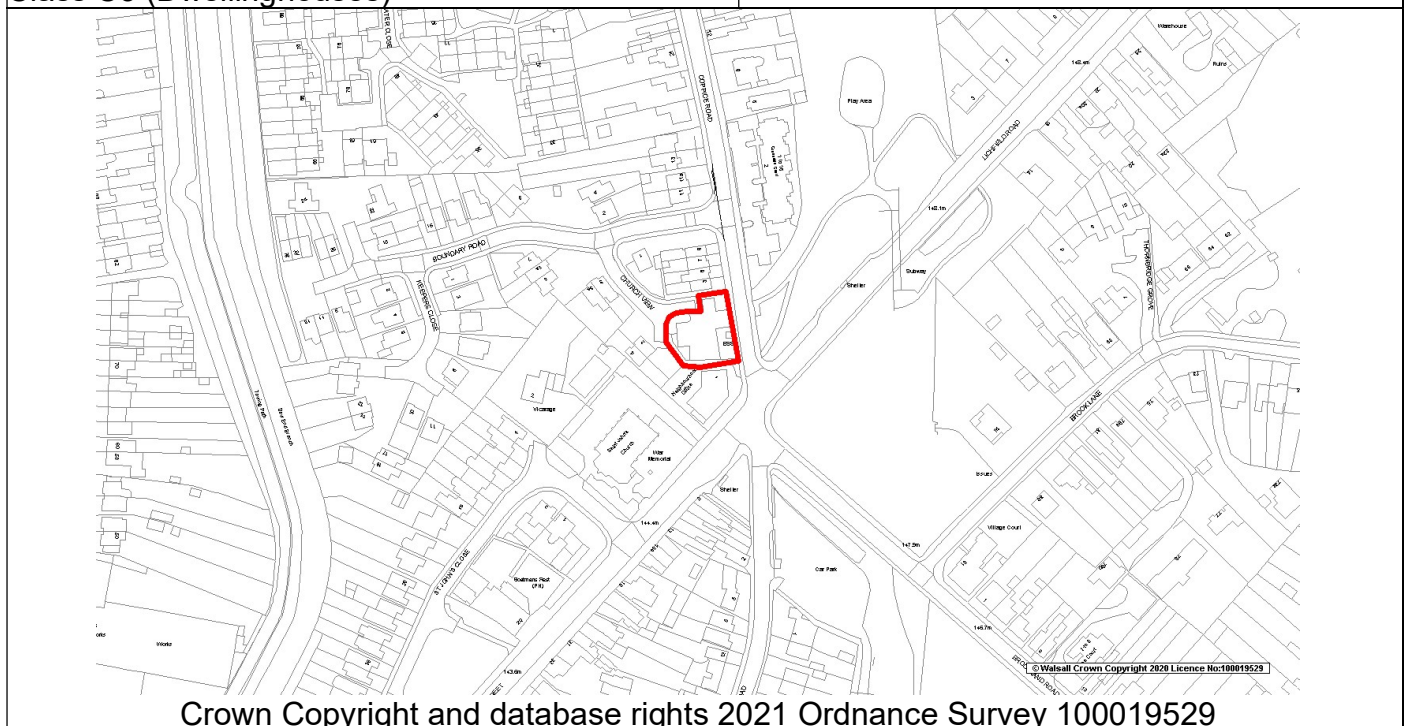
**Ward:** Aldridge North And Walsall Wood

**Agent:** Integrated Designs & Associates Ltd

**Expired Date:** 08-Apr-2021

**Application Type:** Full Application: Minor Use Class C3 (Dwellinghouses)

**Time Extension Expiry:**



#### Recommendation

Refuse Permission

## Proposal

Full application for 4 new semi-detached 2-bedroom dwellings with associated parking and landscaping on land forming part of the car park at the former Walsall Wood Library Coppice Road, Walsall Wood, Walsall.

## Site and Surroundings

The application site forms part of the former Walsall Wood Library and provides parking for the existing building. The site is situated on the corner of Coppice Road Walsall which is a primarily residential area in character. Behind the application site are existing dwellings. The site is a flat level area and the existing library building which does not form part of the application site is a single storey building circa 1990's. The library is now closed to the public. The existing car park is primarily hard surfaced with grassed areas surrounding the edge of the car park. The entrance to the car park is via Coppice Road. The site falls within the Walsall Wood local centre.

## Relevant Planning History

19/0754 – Demolition of existing building and erection of three storey block to provide 15 x 2 bed apartments and 15 parking spaces – Finally Disposed of 06-07-2020.

21/0842 – Extension to create a 1st and 2nd floor to existing building to allow for the construction of 6 x 2-bedroom apartments and associated private amenity space, cycle and bin store and 3 no car parking spaces. Extension of windows vertically at ground floor to allow for front and rear entrances to building. This application is currently under consideration and covered in a separate report to Planning Committee.

## Relevant Policies

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

[www.gov.uk/guidance/national-planning-policy-framework](https://www.gov.uk/guidance/national-planning-policy-framework)

The NPPF sets out the Government's position on the role of the planning system in both plan-making and decision-taking. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, in economic, social and environmental terms, and it emphasises a *"presumption in favour of sustainable development"*.

**Key provisions** of the NPPF relevant in this case:

- **NPPF 2 – Achieving sustainable development**
- **NPPF 4 – Decision Making**
- **NPPF 5 – Delivering a sufficient supply of homes**
- **NPPF 6 – Building a strong, competitive economy**
- **NPPF 8 – Promoting healthy and safe communities**
- **NPPF 9 – Promoting sustainable transport**
- **NPPF 11 – Making effective use of land**
- **NPPF 12 – Achieving well-designed places**
- **NPPF 14 – Meeting the challenge of climate change, flooding and coastal change**
- **NPPF 15 – Conserving and enhancing the natural environment**
- **NPPF 16 – Conserving and enhancing the historic environment**

On **planning conditions** the NPPF (para 56) says:

Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.

On **decision-making** the NPPF sets out the view that local planning authorities should approach decisions in a positive and creative way. They should use the full range of planning tools available and work proactively with applications to secure developments that will improve the economic, social and environmental conditions of the area. Pre-application engagement is encouraged.

### **National Planning Policy Guidance**

On **material planning consideration** the NPPG confirms- planning is concerned with land use in the public interest, so that the protection of purely private interests... could not be material considerations

### **Reducing Inequalities**

The Equality Act 2010 (the '2010 Act') sets out 9 protected characteristics which should be taken into account in all decision making. The **characteristics** that are protected by the Equality Act 2010 are:

- age
- disability
- gender reassignment
- marriage or civil partnership (in employment only)
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Of these protected characteristics, disability and age are perhaps where planning and development have the most impact.

In addition, the 2010 Act imposes a Public Sector Equality Duty "PSED" on public bodies to have due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality and to foster good relations. This includes removing or minimising disadvantages, taking steps to meet needs and encouraging participation in public life.

Section 149(6) of the 2010 Act confirms that compliance with the duties may involve treating some people more favourably than others. The word favourably does not mean 'preferentially'. For example, where a difference in ground levels exists, it may be perfectly sensible to install some steps. However, this would discriminate against those unable to climb steps due to a protected characteristic. We therefore look upon those with a disability more favourably, in that we take into account their circumstances more than those of a person without such a protected characteristic and we think about a ramp instead. They are not treated preferentially, because the ramp does not give them an advantage; it merely puts them on a level playing field with someone without the protected characteristic. As such the decision makers should consider the needs of those with protected characteristics in each circumstance in order to ensure they are not disadvantaged by a scheme or proposal.

### **Development Plan**

[www.go.walsall.gov.uk/planning\\_policy](https://www.go.walsall.gov.uk/planning_policy)

## **Saved Policies of Walsall Unitary Development Plan**

- GP2: Environmental Protection
- GP3: Planning Obligations
- GP5: Equal Opportunities
- GP6: Disabled People
- ENV5: Stabling and Riding of Horses and Ponies
- ENV6: Protection and Encouragement of Agriculture
- ENV7: Countryside Character
- ENV9: Environmental Improvement Initiatives
- ENV10: Pollution
- ENV32: Design and Development Proposals
- ENV33: Landscape Design
- ENV35: Appearance of Commercial Buildings
- T7 - Car Parking
- T8 – Walking
- T9 – Cycling
- T10: Accessibility Standards – General
- T11: Access for Pedestrians, Cyclists and Wheelchair users
- T12: Access by Public Transport (Bus, Rail, Metro and Ring and Ride)
- T13: Parking Provision for Cars, Cycles and Taxis
- LC8: Local Community Facilities

## **Black Country Core Strategy**

- CSP1: The Growth Network
- CSP2: Development Outside the Growth Network
- CSP3: Environmental Infrastructure
- CSP4: Place Making
- CSP5: Transport Strategy
- DEL1: Infrastructure Provision
- DEL2: Managing the Balance Between Employment Land and Housing
- HOU1: Delivering Sustainable Housing Growth
- HOU2: Housing Density, Type and Accessibility
- EMP1: Providing for Economic Growth
- CEN2: Hierarchy of Centres
- CEN3: Growth in the Strategic Centres
- CEN5: District and Local Centres
- TRAN2: Managing Transport Impacts of New Development
- ENV2: Historic Character and Local Distinctiveness
- ENV3: Design Quality
- ENV4: Canals
- ENV5: Flood Risk, Sustainable Drainage Systems and Urban Heat Island
- ENV6: Open Space, Sport and Recreation
- ENV7: Renewable Energy
- ENV8: Air Quality
- WM1: Sustainable Waste and Resource Management

## **Walsall Site Allocation Document 2019**

- HC2: Development of Other Land for Housing
- SLC1 Local Centres

## Supplementary Planning Documents Conserving Walsall's Natural Environment

### Designing Walsall

- DW1 Sustainability
- DW2 Safe and Welcoming Places
- DW3 Character
- DW4 Continuity
- DW5 Ease of Movement
- DW6 Legibility
- DW7 Diversity
- DW8 Adaptability
- DW9 High Quality Public Realm
- DW9(a) Planning Obligations and Qualifying development
- DW10 Well Designed Sustainable Buildings

### Open space, sport and recreation

- OS1: Qualifying Development
- OS2: Planning Obligations
- OS3: Scale of Contribution
- OS4: Local Standards for New Homes
- OS5: Use of Contributions
- OS6: Quality and Value
- OS7: Minimum Specifications
- OS8: Phasing of On-site Provision for Children and Young People

### Air Quality SPD

- **Section 5 – Mitigation and Compensation:**
- Type 1 – Electric Vehicle Charging Points
- Type 2 - Practical Mitigation Measures
- Type 3 – Additional Measures
- 5.12 - Emissions from Construction Sites
- 5.13 – Use of Conditions, Obligations and CIL
- 5.22 – Viability

## Consultation Replies

**Environmental Protection** – concerns raised regarding whether or not consideration has been given within the submitted noise report for the ProPG Planning and Noise May 2017 for new residential development. External areas to be used for amenity space need to be confirmed in relation to the confirmation of existing sound levels and whether any mitigation measures are required. Glazing specification is necessary to afford greater acoustic specification.

**Highways** – raises concerns. The development looks to build on the car park to the former library which will effectively leave the former library without any on-site parking provision. Parking will be an important factor in any future use or development of the library site due to its position on a busy road junction and therefore the Highway Authority is concerned that the current proposal may have a detrimental impact on the future of the library site.

### Strategy Planning Policy – Support

**Severn Trent Water** – no objections

**West Midlands Fire Officer** – comments in relation to fire safety

**Clean and Green** – no objections comment that each property will require bins for recycling and general waste.

## Representations

4 letters of representations received in relation to the following;

- Highway safety
- Residential amenity
- Increase in congestion
- Impede access for existing resident's driveways
- Encroachment onto private land
- Concerns regarding what will happen to the existing library

## Determining Issues

- Principle of development
- Housing need
- Design layout and character/ Visual impact
- Highway safety
- Residential amenity
- Flood Risk and drainage
- Crime and antisocial behaviour
- Impact on heritage assets
- Other issues
- Local finance considerations

### Principle of development

The application site is on a parcel of land used as a car park to the adjacent now disused library. The site lies close to the junction with Coppice Road and Lichfield Road. The site lies in Walsall Wood the Local Centre. Policy SLC1: Local Centres is relevant and seeks to ensure the allocated centres provide for day to day shopping and service needs. Within these areas the retention, enhancement and further development of shops, services and other town centre uses will be encouraged.

A separate planning application for the library building has been lodged for extensions to create a 1st and 2nd floor to the existing building to allow for the construction of 6 x 2 bedroom apartments and associated private amenity space, cycle and bin store and 3 no car parking spaces. Extension of windows vertically at ground floor to allow for front and rear entrances to building. This application is also to be presented to Members of this Planning Committee given both applications are made by the same applicant and are intrinsically linked.

The revised NPPF says that decisions should encourage the effective use of land by re-using land that has been previously developed. The application is mostly on commercial land in a sustainable location. The NPPF also says that housing applications should be considered in the context of the presumption in favour of sustainable development.

The proposal is in a sustainable location being within the built-up area of Walsall Wood.

However, the development is not a sustainable form of development if it fails to consider the environmental role - protecting and enhancing our natural, built, and historic environment. The report considers this further.

## **Housing need**

Chapter 5 of the NPPF relates to delivering a sufficient supply of homes. Paragraph 60 seeks to ensure the governments' objective of significantly boosting the supply of homes. Paragraph 61 relates to strategic housing supply policies and should be informed by local housing need. The council has an emerging housing supply shortfall and has recently failed the Housing Delivery Test because of low housing delivery over the last three years. Paragraph 73b of the NPPF seeks to ensure that the supply of new homes should be well located and designed, and supported by the necessary infrastructure and facilities including a choice of transport modes. The site is part of a commercial area and forms part advertising site/part car park to the adjacent clinic. The site lies within the built-up area of Walsall Wood. The housing scheme proposed is therefore supported on strategic planning policy grounds by BCCS policies CSP1 and HOU1, SAD policy HC2 and NPPF paragraphs 69 and 119. Paragraph 74 relates to maintaining supply and delivery of housing sites over the development plan period. Local Planning Authorities should update annually a supply of deliverable sites against their housing requirement set out in adopted strategic policies.

The Black Country Core Strategy Policy HOU1 Delivering Sustainable Housing Growth seeks to create a network of cohesive, healthy, and prosperous communities and for the provision of sufficient land to provide for sustainable housing growth.

The latest available figures show that there was a 5-year housing land supply as at April 2021, however the Council failed the Housing Delivery Test published in January 2022 based on low levels of delivery over the last 3 years. This means that the size of the required supply buffer has increased resulting in the supply at the time of preparing this report being slightly less than 5 years, and the presumption in favour of sustainable development as described in the NPPF paragraph 11d) is in effect.

## **Design and character/ Visual impact**

The application fails to put forward sufficient justification in relation to how the design is informed by the wider locality in relation to design and impact on nearby heritage assets. St Johns Church a non-designated heritage asset and the Grade II Listed War Memorial a designated heritage asset in the grounds of St Johns Church. The proposed materials are brick and tile of a type not specified and this could be secured by an appropriate materials condition. The use of the site for residential purposes is acceptable in principle which reflects comments made by the Strategic Planning Policy team. The current submission fails to put forward sufficient justification for the design in relation to the impact on the character of the locality in relation to existing heritage assets. Contrary to Saved UDP Policies GP2 (Environmental Protection) and ENV32 (Design and Development Proposals), Black Country Core Strategy Policies CSP4 (Place Making), ENV2 (Historic Character and Local Distinctiveness) and ENV3 (Design Quality) and DW1 (Sustainability) and DW3 (Character), of the Designing Walsall SPD. Together with the design advice in Chapter 16 of the NPPF Conserving and enhancing the historic environment.

## **Highway safety**

The proposed development is accessed via Coppice Road. The Highways officer comments that the relationship between the adjacent retained former library building and the site is not fully explained, particularly as both sites are in the same ownership.

The development looks to build on the car park to the former library which will effectively leave

the former library without any on-site parking provision. Parking will be an important factor in any future use or development of the library site due to its position on a busy road junction and therefore the Highway Authority is concerned that the current proposal may have a detrimental impact on the future of the library site. Whilst this is the case, the separate application for the conversion of the library building 21/0842 being considered in tandem with this application does demonstrate a use for the library if the parking and access concerns can be overcome. However, the current submission for the library building proposes a new access which is not supported by the Highway Authority in relation to the impact on the highway network and highway safety. The Highway Authority therefore considers the development will have an unacceptable impact on road safety and have a negative impact on the operation of the strategic road network contrary to the NPPF 2021 paragraph 111. The proposal provides 8 parking spaces three of which are divorced from the properties to the side of the application site and it is unclear as to which dwellings these spaces will serve.

Para 110 of the National Planning Policy Framework 2021 seeks to ensure that specific plans for development should provide 'safe and suitable access to the site that can be achieved for all users' and that, under para 112, applications for development should 'give priority first to pedestrian and cycle movements, address the needs of people with disabilities and reduced mobility, create places that are safe and secure and attractive which minimise the scope for conflicts between pedestrians, cyclists and vehicle movements, allow for the efficient delivery of goods and access by service and emergency vehicles'.

Concerns have been raised by third parties in the locality with regard to the likely adverse impact of more dwellings in this location in relation to congestion, parking and access and highway safety, together with concerns for the future use of the library building.

The application is not considered to accord with the BCCS Policy TRAN2 Managing transport impacts of new development, and "saved" policies T7 Car Parking, T13 Parking provision for cars of the Walsall UDP and paragraph 110 (d) and 111 of the National Planning Policy Framework 2021.

## **Residential amenity**

The proposed dwellings are below the minimum size set out in the nationally described space standard for houses of this type – this should be a minimum of 79sqm of internal space where there is currently only 72.9sqm this is a shortfall of 8% below the minimum. Whilst the space standards are advisory in nature, this goes some way to demonstrate that the proposal would fail to provide a satisfactory level of amenity for intended occupiers.

The separation distance between the proposed dwellings and the house 2 Church View is below the guideline set by the SPD at 19.9m from the recommended 24m. Annex D of the Designing Walsall SPD requires separation from distances of 24 metres from habitable windows at two storeys and above the proposed separation distances are 20 metres from the habitable windows to the rear of 2 Church Road to the rear of the proposed apartments. The standards are applied more robustly at the rear than across roads at the front of new development. The amended plans submitted have failed to overcome the previous concerns in relation to the separation distances to the rear of the site and the property at 2 Church View.

There is a separate application for the conversion and extension of the existing library building to form 6 apartments. However, this application is being considered in tandem with the application for the proposed dwellings.

Environmental Protection have raised concerns about the potential impact of noise from both the road and the substation in the vicinity of the proposed dwellings. They have requested a noise survey be produced to determine whether the site is suitable for residential development.



Comments have been received from nearby occupiers with regard to the impact on residential amenity from encroachment to their properties, and the provision of boundary treatment in close proximity to neighbouring dwellings, together with concerns regarding access being impeded to their existing driveways from the resulting development.

The proposal is considered to be contrary to the Unitary Development Plan Policies GP2 (Environmental Protection) and ENV32 (Design and Development Proposals), Black Country Core Strategy Policies CSP4 (Place Making), and ENV3 (Design Quality) Designing Walsall SPD in particular policies DW1 Sustainability, DW3 Character and DW9 High Quality Public Realm, and the advice in appendix D Guidelines for residential development and policies, together with Together with the design advice in Chapter 12 of the NPPF Achieving well-designed places.

### **Crime and antisocial behaviour**

The proposal is not considered to have the potential to result in harm to the amenities of the locality from crime and antisocial behaviour. The design of the development gives opportunities for pedestrian access through the site due to the use of the ground floor as a public house. There will be natural surveillance throughout most of the day from users of the ground floor public house and the accommodation above from the habitable windows.

This application is considered to accord with Saved Unitary Development Plan Policy GP2 (Environmental Protection), Site Allocation Document Policy HC2 (Development of Other Land for Housing), the aims of Appendix D (Numerical Guidelines for Residential Development) of the Designing Walsall SPD and the National Planning Policy Framework 2021.

### **Flood Risk and Drainage**

The application site is situated in Flood Zone 1 an area at the lowest risk of flooding as defined on the Environment Agency Flood Map for Planning. There are no objections to the proposal from Severn Trent Water Authority. In accord with the Black Country Core Strategy Policy ENV5: Flood Risk, Sustainable Drainage Systems and Urban Heat Island.

Drainage could be dealt with by a planning condition to secure details for the disposal of foul and surface water.

### **Impact on heritage assets**

The application site lies in close proximity to the Church of St John Walsall Wood, which is a non-designated heritage asset, within the church yard is a Grade II Listed War memorial. No information has been put forward in the submission in respect of the impact the proposed development to describe the significance of the heritage assets, including any contribution made by the setting of the Grade II Listed War Memorial. Paragraph 194 of the National Planning Policy Framework requires that in determining applications local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting, at a level sufficient to understand the potential impact of the proposal on their significance. Paragraph 203 of the National Planning Policy Framework requires that the effect of an application on a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm to the significance of the heritage asset. The submission does not put forward any justification or assessment of the significance of St Johns Church and therefore there is insufficient information put forward in the submission to demonstrate how the development will affect the non-designated heritage asset St Johns Church.

There is insufficient information put forward in the submission to demonstrate the significance of the heritage asset a Grade II Listed War Memorial at the St Johns Church Walsall Wood a non-designated heritage asset, and how the proposal would impact upon the heritage asset contrary to paragraph 194 of the National Planning Policy Framework. Contrary to the Black Country Core Strategy ENV2: Historic Character and Local Distinctiveness and the National Planning Policy Framework Conserving and Enhancing the Historic Environment. Paragraphs 203, 194 and 195.

## **Other issues**

Regarding the adjacent library building which is now unused. A previous application for the development of the library building site via demolition and new build apartments has been withdrawn. The current application would result in the loss of parking for the library site and the site is presently demonstrated in the same ownership, but the library is not part of this application. The development looks to build on the car park to the former library which will effectively leave the former library without any on-site parking provision. There is a separate application for the conversion and extension of the existing library building to form 6 apartments. However, this application is being considered in tandem with the application for the proposed dwellings in this submission. However, the current submission for the library building proposes a new access which is not supported by the Highway Authority in relation to the impact on the highway network and highway safety. The Highway Authority therefore considers the development will have an unacceptable impact on road safety and have a negative impact on the operation of the strategic road network contrary to the NPPF 2021 paragraph 111.

Parking will be an important factor in any future use or development of the library site due to its position on a busy road junction and therefore it is considered that the use of the site for residential development in its present form would prejudice the future development of the wider site which would be contrary to the aims and objectives of the National Planning Policy Framework in relation to sustainable development.

Concerns have been raised by third parties of neighbouring properties regarding an alleged encroachment onto their land from the resulting development. This is a private matter and is not a material planning consideration. It is understood that the correct certificates of ownership have been provided with the application.

## **Local finance considerations**

Section 143 of the Localism Act requires the local planning authority to have regard to 'local finance considerations' when determining planning applications. In Walsall at the present time this means there is need to take account of New Homes Bonus monies that might be received as a result of the construction of new housing.

This application proposes 4 new homes.

The Government has indicated that, for 2020-21, it will award approximately £1,000 per dwelling per year, plus a further £350 for each affordable dwelling, for each net additional dwelling provided. The payment is made each year for a period of 4 years from completion of the dwelling.

The weight that should be given to this, including in relation to other issues, is a matter for the decision-maker.

## Conclusions

There is a current appeal against non-determination of this planning application. There is also an appeal from the applicant for an award of costs which is to follow. Officers are therefore seeking a resolution from Members of this Planning Committee on how they would have otherwise determined this application. The resolution will be forwarded to the Planning Inspectorate and will form part of the Council's appeal documents.

The presumption in favour of sustainable development in relation to Chapter 2 Achieving Sustainable Development of the National Planning Policy Framework is relevant in the determination of this application. Paragraph 10 requires that sustainable development is pursued in a positive way. Paragraph 11 seeks to ensure that for decision taking this means approving development proposals that accord with an up to date development plan or the application of policies in the Development Plan and Framework protect areas or assets of particular importance and 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.

Officers have worked with the applicant and their agents positively and creatively to provide an opportunity to address the concerns raised by the Council and by consultees and interested parties. A satisfactory way forward has not been negotiated and the amendments have been submitted have failed to overcome previous concerns. Taking into account the above factors it is considered that the application should be recommended for refusal.

## Recommendation

Refuse Permission

## Reasons

1) There is insufficient information put forward in the submission to demonstrate the significance of the heritage asset, a Grade II Listed War Memorial at the St Johns Church which itself is a non-designated heritage asset, or how the design has been informed by the wider locality in relation to design thus fails to demonstrate how the proposal would impact upon the heritage asset. Furthermore, no information has been put forward in the submission to demonstrate that the proposal would result in a public benefit or the creation of additional dwellings that would count towards the provision of additional housing within the Borough and whether that would outweigh any harm arising. The proposal is therefore contrary to the Black Country Core Strategy ENV2: Historic Character and Local Distinctiveness and the National Planning Policy Framework Conserving and Enhancing the Historic Environment. Paragraphs 203, 194 and 195.

2) This proposal would result in the loss of parking to serve the existing library site where parking would be an important factor to facilitate any potential future use or development of the adjacent library site due to its position on a busy road junction. Insufficient evidence has been put forward to demonstrate that the proposal secures the optimum viable use of the wider site and fails to provide comprehensive parking and vehicle access arrangements. The proposal is therefore contrary to Black Country Core Strategy Policy TRAN2 Managing transport impacts of new development, and "saved" policies T7 Car Parking, T13 Parking provision for cars of the Walsall UDP and paragraph 110 (d) and 111 of the National Planning Policy Framework 2021.

3) The proposed development fails to provide a satisfactory standard of amenity for existing and future occupiers in relation to unacceptable separation distances between existing occupiers of 2 Church View and the proposal itself resulting in unacceptable overlooking and loss of privacy. The proposal is therefore contrary to Saved Unitary Development Plan Policies GP2 (Environmental Protection) and ENV32 (Design and Development Proposals), Black Country

Core Strategy Policies CSP4 (Place Making), and ENV3 (Design Quality), DW1 Sustainability, DW3 Character, DW9 High Quality Public Realm, and the advice in Appendix D of the Designing Walsall SPD together with the design advice in Chapter 12 of the NPPF Achieving well-designed places.

## END OF OFFICERS REPORT