

Recommendation Report for Planning Permission

REF NO: LU/214/19/PL

LOCATION: 18-22 East Street
Littlehampton
BN17 6AW

PROPOSAL: Erection of 2no. outbuildings to the rear of 18-22 East Street to provide communal/multi-functional space & therapy rooms ancillary to the lawful use of the site as a Private Detox & Rehabilitation Clinic (C2 Residential Institutions)

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	The proposal is for the erection of two outbuildings to house a community/multifunctional space for group activities/ events and two therapy rooms to provide additional therapy rooms. This will allow expansion of current facilities and services and offer a wider range of activities to the community. The proposed single storey outbuilding to the rear of 18-20 East Street is the larger of the two proposed buildings, providing communal room, kitchen and office facilities within a building of approximately 50m². The building will be constructed using flint facing elevations, similar to the existing boundary wall and the facades of the host property. The smaller of the proposed outbuildings, located to the rear of 22 East Street, measures approximately 25m² and will provide a flexible therapy space. This proposed building will be timber clad.
SITE AREA	0.09 hectares
TOPOGRAPHY	Predominantly flat. The site has a slight incline, rising from the north (front) to the rear (south) of the site.
TREES	None of any significance affected by the proposed development.
BOUNDARY TREATMENT	Flint walling to approx. 2-3m height enclosing rear garden. To frontage walling to approx 1m.
SITE CHARACTERISTICS	Former doctors surgery occupies two adjacent properties 18 - 22 East Street. These properties sit at an end to a group of similarly constructed two-storey properties characterised by flint with red brick quoins and course detail. Other features also include front gable bargeboards with finial and brick chimney together with small front gardens. A wide and deep stepped entrance has been created to the main entrance of the former doctors surgery (18/20 East Street) at the eastern side of the front elevation with the

western side given over to parking for one vehicle. The rear gardens to both of these properties have been covered with concrete hardstanding to create further parking spaces.

CHARACTER OF LOCALITY

The area is part of a residential street comprising a uniform character with older style 2 storey semi/detached properties of similar appearance in medium plots set back from the highway with gardens to the front and rear within an urban environment on the edge of the town centre. To the west of the site is 'The Flintstone Centre', an alternative provision college. This site adjoins the tarmac playing area associated with the centre.

RELEVANT SITE HISTORY

LU/357/18/PL	Change of use from former doctors surgery (D1 Non-residential Institutions) to private detox & rehabilitation clinic (C2 Residential Institutions). This application affects the character & appearance of the East Street Conservation Area.	ApproveConditionally 26-02-19
LU/65/17/PL	Change of use from Doctors Surgery (D1 Use Class) to (C3 dwelling houses) comprising 1no. 4-bed dwellinghouse & 1no. 3-bed dwellinghouse. This application affects the character & appearance of the East Street, Littlehampton Conservation Area & the setting of a Listed Building.	ApproveConditionally 15-05-17

REPRESENTATIONS

REPRESENTATIONS RECEIVED:

Littlehampton Town Council

No Objection

1 Objection

- Overdevelopment of the site in a residential area.
- Visual effect on neighbouring properties would be significant.
- Would result in loss of views, so impacting negatively on the residential amenity of neighbours.
- There would be possible noise and disturbances as clients would be using the whole site, not just the main building.
- The proposed development will overlook residential gardens, so spoiling the amenity.
- Brings buildings in much closer proximity to the houses in Goda Road and the Old Dairy development which will have a negative impact on both.
- This is a clear case of 'garden grabbing'!
- This is a residential area and must be assessed as such.
- This proposal will prejudice the 'existing character and appearance' of the locality, and not

'preserve or enhance it' as the Local Plan demands.

- The scale, design and materials are non-traditional and inappropriate and damaging to the area.
- The historic street patterns would be damaged by moving development to the garden area. It would alter the spaces created between buildings and obscure flint walls.
- The proposed buildings, clearly visible from the street and all neighbouring properties will not preserve or enhance the Conservation Area (CA), being out of keeping with all the local buildings.
- East St is currently 'of uniform character' with 'medium plots with gardens to front and rear'. Two large buildings to the rear and a little 'urban planting' is out of character.
- This proposal adversely affects 'the setting, character, appearance of and views into the conservation area', which the Local Plan expressly forbids.
- The original application had several letters of support, many from members of staff, who did not make known their financial and professional interest in the development. This is unethical and even perhaps fraudulent.
- This application does not seem to consider parking. Presumably the extra buildings mean more clients will be on site and therefore presumably more visitors and staff. If so then the parking needs assessment needs to be redone to reflect greater numbers.

COMMENTS ON REPRESENTATIONS RECEIVED:

- The loss of a view is not a material planning consideration.
- The proposal does consider car parking and states that the proposed ancillary outbuildings will not give rise to additional service users.
- In terms of site coverage and density the total site area is 0.08 hectare (880 m²), with the existing buildings occupying 85 m² and 134 m² respectively, a total of 219 m² (approx. 25% of total site area). The proposed new buildings comprise a 25.6 m² therapy space and a 50.4 m² community space (total 76 m²). This will increase the total built footprint to 295 m² (approx. 33% of total site area). This demonstrates that there is a reasonable amount of space providing a setting to the building and ensures that the proposal is in accordance with the general density of development in the locality and the character of the area.
- For the reasons set out below the proposal does not result in materially adverse overlooking or overbearing impacts on adjoining neighbouring properties.
- Comments on other representations are set out below.

CONSULTATIONS

Environmental Health
 Economic Regeneration
 Southern Water Planning
 Engineers (Drainage)
 Engineering Services Manager
 WSCC Strategic Planning
 Conservation Officer

CONSULTATION RESPONSES RECEIVED:

Conservation Officer - The buildings concerned with this application are locally listed and located within a conservation area. Further the site is located in close proximity to two listed buildings; a farmhouse and a school building.

The special character and appearance of the conservation area largely derives from the great variety in age, style, form and function of the buildings within the area. Large formal buildings, such as Roland

House and Winterton Lodge and the Manor House, contrast in scale and style with nearby domestic buildings often constructed in a vernacular style using local materials. The application site is one such domestic building.

The application site itself contains two attractive flint buildings which front on to East Street and are characterised by their flint and decorative brick construction. They have small front garden areas which are separated from a public footpath by a flint boundary wall with brick capping. Both the buildings associated with this application, and the conservation area are considered to be of historic interest representing an important stage in the development of the town.

Likewise, both of the Listed Buildings form key parts of the local character. The School building is a good example of a late 19C school building which was constructed for the growing town and is therefore of architectural significance.

The proposed development is for the erection of two single storey outbuildings located to the rear of 18-22 East Street. The units are two different sizes and their elevations are to be treated with different materials. These materials are relevant to the conservation area, but are to be used in a more contemporary way. The concept of introducing a modern design is acceptable in this location as it will not be an attempt to copy the past, but introduce a new form of development. The success of such a modern scheme will depend upon the material and joinery to be used. The location of the units will mean that they will be visible from certain parts of the conservation area.

Further, there is an attractive wall which runs through part of the site. This wall should be protected during any development works so as to minimise any harm to it.

Landscaping is also proposed as a means of reducing the structures impact from the street. Such a concept is acceptable, subject to details which could be conditioned.

Conclusions - It is considered that the concept of additional development in this urban context will not result in any harm to the assets identified above, and on balance is considered to be acceptable.

The contents of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), especially section 72 should be taken into account.

Southern Water - No Objection Informative requested.

Drainage Engineer - The proposals are for two small units to be formed with green roofs. Given the small scale of the proposals, their location and that the area is currently formed of hardstanding we have no conditions to request. Surface water drainage should be designed and constructed in accordance with building regulations.

Economic Development - No Objection

COMMENTS ON CONSULTATION RESPONSES:

- comments noted. The wall referred to by the Conservation Officer for retention is not indicated for removal on the plans and it is protected due to the site's location within a Conservation Area.

POLICY CONTEXT

Designation applicable to site:

Building of Special Character

Part of site lies within Flood Zone 3

Conservation Area

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

DDM1	D DM1 Aspects of form and design quality
DDM4	D DM4 Extensions&alter to exist builds(res and non-res)

HERSP1	HER SP1 The Historic Environment
HERDM2	HER DM2 Locally Listed Buildings or Structures of Character
HERDM3	HER DM3 Conservation Areas
TSP1	T SP1 Transport and Development

Littlehampton Neighbourhood Plan 2014 Policy 1	The Presumption in Favour of Sustainable Development
Littlehampton Neighbourhood Plan 2014 Policy 2	A Spatial Plan for the Town
Littlehampton Neighbourhood Plan 2014 Policy 6	Residential development involving the loss of community facilities
Littlehampton Neighbourhood Plan 2014 Policy 17	Buildings and Structures of Character

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Neighbourhood Development Plan

Where applicable, Neighbourhood Development Plan's (more commonly known as a neighbourhood plan or NDP), once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area.

Policies 1, 2, 3, 6 and 17 of Littlehampton Neighbourhood Plan are considered relevant to the consideration of this application.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose 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."

The proposal is considered to comply with relevant Development Plan policies in that it would have no materially adverse effect on visual or residential amenity of the character of the area.

Section 71(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 states:

In the exercise, with respect to any buildings or other land in a Conservation Area of any powers (under the Planning Acts), special attention shall be paid to the desirability of preserving or enhancing the

character or appearance of that area.

The proposal is considered to comply with these criteria in that it is not considered to materially affect the character or the setting of the Conservation Area, the setting of adjacent listed buildings or the character and setting of the building of special character.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are no other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background.

CONCLUSIONS

Principle of Development

The site is located within the built-up area where the principle of development is acceptable. In this instance, the main criteria against which the application will be assessed is contained within relevant policies of the Arun Local Plan mainly DDM1, DDM4 and DSP1 which seek to prevent development that would have an adverse impact upon visual and residential amenities and the character of the area. The proposal is considered to be in keeping with its urban setting and to accord with policy.

The made Littlehampton Neighbourhood Plan (2014) contains the following policies relevant to principle considerations:

Policy 1 - The Presumption in Favour of Sustainable Development

Policy 2 - Spatial Plan for the Town

Policy 17 - Buildings and Structures of Character

Policy 1 states planning applications which accord with the policies in the Neighbourhood Plan will be approved, unless material considerations indicate otherwise. There are no policies in the Neighbourhood Plan specifically relating to this site. The proposal would accord with this policy.

Policy 2 states that the Neighbourhood Plan concentrates future housing, economic and community - related development within the built up area of Littlehampton. The proposal accords with this policy.

Policy 17 states that the effect of the proposal on non designated heritage assets will be taken into account in determining applications to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. The proposal is considered to minimise the impact on this heritage asset.

The principle of development within the built-up area boundary of Littlehampton is supported in policy terms subject to acceptable design, scale, form and appearance.

The site is situated within a highly sustainable location and on the fringe of the Fitzalan Corridor, where Neighbourhood Development Plan Policy 3 seeks to locate development. Therefore, the principle of additional buildings is appropriate subject to satisfying all other relevant considerations.

The loss of the former doctors surgery was accepted under planning permission LU/65/17/PL. Policy 6 of Littlehampton Neighbourhood Plan 'Residential development involving the loss of community facilities' . This policy sets a presumption against development which would result in loss of community facilities. At the time of application LU/65/17/PL it was demonstrated that the existing doctor's surgery buildings were vacant and surplus to NHS requirement.

Planning permission LU/357/18/PL which has been implemented granted permission for both buildings for use as a Private Detox and Rehabilitation Clinic providing short-term residential accommodation with an element of care, and is run by a professional team of staff. The use provides an addition to the local healthcare and addresses the shortage of similar such facilities in the area and this application provides an opportunity for Lovelong House to expand its essential community facilities and improve the overall services available at the premises. The proposed 2no. outbuildings will be wholly ancillary to this lawful use of the site and provide necessary communal and therapy space within a quiet location, separate to the habitable accommodation within the main buildings. NPPF paragraph 80 encourages the planning process to help create conditions which allow businesses to expand and adapt.

Impact on Character and Appearance of the Conservation Area

The agent has submitted a Heritage Statement in accordance with paragraph 189 of the NPPF. The site is located within East Street Conservation Area which comprises a number of historic and more modern properties of varying character. The primary focal point within this part of the conservation area is the frontage of existing properties along East Street, characterised by their flint construction. The existing building is prominently located close to the East Street road frontage and its junction with Franciscan Way. Most of the rear of the site is already laid out for car parking. The development will generally not be visible from the surrounding streets and where it is visible it will have a minimal impact. The proposal is well screened from the street scene and public view due to its position at the rear of the site. The scheme is also screened through proposed planting which helps reduce any visual impact on the East Street elevation. The landscaping proposed is subject to a condition seeking agreement to detail and provision of planting.

The proposed development is influenced by the surrounding context. The proposed buildings have been designed in a contemporary style, utilising traditional materials including flint and timber cladding to create a development which responds successfully to its context. Both buildings have flat roofs and are single storey which reduces their impact in the street scene. The roofs are proposed to be green roofs which adds to the landscape screening effect and assists in assimilating the proposal within its traditional context. The materials palette has been carefully considered to both integrate and respond to the context, providing a design response that will blend in to its setting. It is not anticipated that the buildings would have a materially adverse effect on the character or appearance of the Conservation Area or the area generally. It is therefore considered to accord with policies DDM1 and HERDM3 of Arun Local Plan and paragraph 190 of the NPPF.

Section 16 of the NPPF, conserving and enhancing the historic environment, seeks to protect and preserve the setting and character of conservation areas, although it recognises the importance for local planning authorities to identify development opportunities within such areas which represent an enhancement and improvement to the built form of the locality (paragraph 200).

In considering whether to grant planning permission with respect to any buildings or other land in a Conservation Area, it is necessary to have regard to the desirability of preserving or enhancing the character or appearance of that area (Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed development for the erection of two ancillary and subservient outbuildings, which have been sensitively designed utilising natural materials to reflect the existing locally listed buildings, would represent acceptable development and would not have an adverse impact or cause harm to this designated Conservation Area or the setting of neighbouring listed buildings in accordance with section 66(1) of the of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The proposal also includes partial reinstatement of a garden area to the rear of 22 East Street and small areas of planting to the rear of 18-20 East Street, thereby reducing the extent of car parking

and hard surfacing around the building which forms an enhancement within the Conservation Area in accordance with policy.

Policy HER DM2 of the recently adopted Local Plan seeks to protect the appearance and setting of buildings or structures of character from inappropriate alterations and extensions. The proposed ancillary development, as already noted, has responded positively to its location through the subservient scale and choice of materials, and would provide the opportunity to improve the setting of the main buildings through the reduction in hardstanding, and in this regard it is asserted the proposed development is fully in accordance with this policy and that of Policy 17 of Littlehampton Neighbourhood Plan.

The proposed development will have no detrimental impacts on the historical significance or architecture of buildings, as the main existing buildings will remain architecturally the same, whilst the proposed outbuildings will be subordinate and constructed utilising sympathetic materials. Overall, it is concluded that the proposals comply fully with the policy objectives of the National Planning Policy Framework.

Impact on Building or Structure of Character

Policy HERDM2 of Arun Local Plan states planning permission will not be permitted for alterations, extensions or other development which would adversely affect the appearance of such buildings or structures. The exception is where a redevelopment results in an overall design improvement and benefit to the character and appearance of the area. The significance of heritage assets is also noted in Policy 17 of Littlehampton Neighbourhood Plan.

Given that the buildings are single storey and located to the rear and are of limited footprint they would not dominate the appearance and setting of the Building of Special Character. They would appear subservient and ancillary. In addition, the proposal also includes partial reinstatement of a garden area to the rear of 22 East Street and small areas of planting to the rear of 18-20 East Street, thereby reducing the extent of car parking and hard surfacing around the building which forms an enhancement to the setting of the building.

Residential Amenity

The proposed buildings are located 1m from the southern boundary and 0.9m from the eastern boundary and have heights of 3m and 2.5m respectively. In terms of the proposed smaller outbuilding to the rear of 22 East Street, this would be largely screened by a tall boundary wall to the rear, and boundary wall with trellis to the east. The larger of the two proposed buildings would be screened, in part, by a boundary wall to the rear, adjoin the new residential development. The existing flint walling is approximately 1.7m high so some of the closest elevation would project above the boundary wall. However, the building adjacent to the eastern boundary has the lower height and would have no materially adverse overbearing impact on the adjoining property to the east. Most of the area abutting the northern boundary is a garage compound and the end elevation of the taller building is adjacent to the new residential dwellings under construction. It has a length of 6m, but much of the elevation abuts the limited tip of the site where residential amenity would not be compromised.

Policy D SP1 of the Local Plan indicates planning permission will be granted for schemes displaying high quality design and layout. Policy DDM1(3) further indicates development will be permitted if it takes into account impact on adjoining occupiers or property. In this case, it is considered that the proposed development would be acceptable in terms of impact on neighbouring uses and occupiers given the largely residential character of this area, including future occupiers of residential properties to the rear.

The larger building will be off-set from the rear boundary by approximately 1.1m. in terms of overlooking

there are windows proposed in the rear elevation which have windows within this southern elevation serving a toilet and office, and therefore these could be obscure glazed, and are to be controlled by condition.

Flood Risk

According to the Environment Agency's flood risk mapping, a small part of the application site falls within Flood Zone 2/3. These areas are classified as being potentially affected by flooding from either river or sea, if there are no flood defences. The rear of the site, where the proposed development is located, falls within Flood Zone 1, which is classified as land having less than 1:1,000 annual probability of river or seas flooding. The two outbuildings are for ancillary communal and therapy rooms, with no habitable accommodation proposed.

The Environment Agency have not been consulted since the relevant part of the site is outside of an area at high risk of flooding and there are no records of flooding within the vicinity of the site.

Car Parking and Highway Safety

County Highways have not been consulted on the application given that the existing vehicular access between numbers 20-22 will be retained and parking area and the traffic associated with the use is unlikely to significantly increase. Parking is currently provided on site for both employees and customers, through 7 parking spaces, including a disabled bay. It is likely that the building users will walk or cycle to the site or to local services/amenities, due to the site's highly sustainable location.

The site is sustainably located within 300m of the town centre and the nearest bus stop is 210m to the south west. The train station is approximately 600m away. The Transport Statement submitted with the previous application on the site indicated the existing Doctors Surgery will generate approximately 26 vehicle trips in the weekday AM Peak, twenty vehicle trips during the weekday PM Peak and a daily total of circa 310 vehicle trips. The clinic generates no more than two vehicle trips on the network during the peak hours, and 18 trips over the whole day. The peak hours for the use are 9am to 10pm and 4pm to 5pm. This is due to staff change overs occurring outside the traditional peak periods and the specialist and residential nature of the treatment plan, which means that visitors and new patient trips will be kept to a minimum. The agents have advised that the proposed ancillary outbuildings will not give rise to additional service users.

It is considered that any proposed change of use will not have any detrimental impact on the existing road network, as any trips associated with the private detox rehabilitation clinic are likely to represent a significant reduction compared with the previous permitted use of the site. The proposal therefore accords with policy TSP1 of Arun Local Plan.

The Transport Report which accompanied the change of use application advised that the development would require 5no car parking spaces for staff and visitors together with 1no disabled parking space, and this has been provided onsite in the form of dedicated vehicle bays.

Conclusion

The application is therefore recommended for approval subject to the following conditions:

HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human

Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal no impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

RECOMMENDATION

APPROVE CONDITIONALLY

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

Location Plan PL01

Block Plan PL10

Proposed Site Plan PL11

Proposed East Elevations PL21

Proposed North and South Elevations PL22

Proposed West Elevations PL20

Proposed Street Scene PL30

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy DDM1 of the Arun Local Plan.

- 3 No development above damp proof course (DPC) level shall take place unless and until precise details of materials and finishes to be used for external walls of the proposed buildings have been submitted to and approved by the Local Planning Authority and the materials so approved shall be used in the construction of the buildings.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity and character and appearance of the area by endeavouring to achieve a building of visual quality in accordance with policies DDM1, HER DM3 and HER DM2 of the Arun Local Plan.

- 4 No development above damp proof course (DPC) level shall take place until there has been submitted to, and approved by, the Local Planning Authority, a landscaping scheme to cover the area identified on Proposed Site Plan PL11. The approved details of the landscaping shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of amenity and of the environment of the development in accordance with policy D DM1 of the Arun Local Plan.

- 5 The windows on the east elevation of the therapy building and south elevation of the community room shall at all times be glazed with obscured glass and fixed to be permanently non-opening below 1.7m internal floor level.

Reason: To protect the amenities and privacy of the adjoining property in accordance with policy DDM1 of the Arun Local Plan.

- 6 INFORMATIVE: A formal application for connection to the public sewerage system is required in order to service this development. Please read our New Connections Services Charging Arrangements documents which has now been published and is available to read on our website via the following link <https://beta.southernwater.co.uk/infrastructure-charges>. The disposal of surface water from this development should be in compliance with the following hierarchy of Part H3 of Building Regulations:
- a) An adequate soakaway or some other adequate infiltration system.
 - b) A water course.
 - c) Where neither of the above is practicable: a sewer.

- 7 INFORMATIVE: It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.
- For further advice, please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119), www.southernwater.co.uk or by email at developerservices@southernwater.co.uk.

- 8 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.