

## **Planning application ref. number 18/04496/APP**

***Planning application to Aylesbury Vale District Council for the erection of 17 dwellings and associated works to the South of Hogshaw Road Granborough.***

**Granborough Parish Council (GPC) have considered the above application and wishes to OBJECT to the application as submitted.**

### **Introduction**

**Previous application:** Before detailing the grounds of those objections, the GPC would like account to be taken of the fact that this is a very similar application to the outline application submitted under planning reference 17/03624/AOP and which was refused by AVDC on multiple grounds.

GPC has been advised by AVDC that, in effect nothing relating to that previous application will be carried forward to this application. On that basis GPC considered that the applicants documents titled *Statement of Community Involvement* should be disregarded in any considerations as it related entirely to the previous application. The revised NPPF states at paragraph 128 ... “applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”. GPC can confirm that there has been no public consultation in respect of this application.

**Current Planning Application:** GPC is concerned that the applicant has failed to properly complete section B of the application form and in so doing has failed to notify AVDC that this application relates to land in AVDC’s ownership. The piece of land in question is in Sovereign Close and provides the only access to 15 of the properties which form the majority northern part of the site. This strip of land is designated as Open Space and must remain so even if sold.

**Appendix 1** to this objection sets out GPC’s concerns relating to the supporting document, the Planning Design and Access Statement accompanying the current planning application. There are interpretations, errors and inaccuracies in the document which are of great concern to the Parish Council.

### **Grounds of Objection**

#### **1. Housing land supply & Sustainability**

GPC considers that since AVDC can demonstrate a housing land supply in excess of the 5 years requirement in the NPPF that the saved policy RA14 in the current AVDLP is consistent with the NPPF. If the AVDLP is to be the document used to determine the application, then this is the relevant policy and it states: -

*On the edge of built up areas of settlements listed in Appendix 4 of the Plan, permission may be granted for residential or mixed-use development of up to 5 dwellings on a site not exceeding 0.2ha where:*

- a) The site is substantially enclosed by existing development;*
- b) The proposal would satisfactorily complete the settlement pattern without intruding into the open countryside; and*
- c) The proposal does not comprise the partial development of a larger site.*

*Proposals will not be granted for development that impairs the character or identity of the settlement or the adjoining rural area.*

In relation to the above policy we would comment as follows:

- Granborough is one of the villages listed in Appendix 4
- The policy clearly limits the potential for residential development on the edge of this type of settlement up to a maximum of 5 dwellings and on a site not exceeding 0.2ha. The application is for 17 dwellings on a site of 1.3ha. (or sometimes in the application as 1.5ha)
- The site is by no means substantially enclosed by existing development; the proposals would not satisfactorily complete the settlement pattern without intruding into open countryside; and the proposal is clearly only a partial development of a larger site.

GPC considers that the proposal would impair both the character and identity of Granborough and its adjoining rural area.

Further, the preamble to policy RA14 states that it is appropriate to allow limited small scale developments at settlements that have some community facilities like shops, pubs and post offices, are reasonably accessible and may provide some employment opportunities.

Granborough has no shop or post office and only one pub. The two hourly bus service does not make services located at other settlement accesible to residents of the village. The preamble also states that at the edge of such settlements there may be scope for small scale development between the built-up area and the countryside. These developments will be very limited — a typical example might be a farmyard — and they should avoid intrusion into the rural setting of the settlement and, where possible, strengthen the interface between the village and the countryside. Clearly the proposals are not the redevelopment of an existing farmyard and, should planning permission be granted, it would in fact weaken the interface between the village and the countryside because of the potential for further development beyond that already being proposed.

Granborough is categorised as a 'smaller village' in the Settlement Hierarchy 2017 which defines them as 'Smaller, less sustainable villages which have poor access to services and facilities. However it is expected that small scale development could be accommodated without causing any environmental harm. This level of development is also likely to help maintain existing communities.'

The current proposal for 17 units is not 'small scale' and Granborough is a 'less sustainable' location.

GPC objects to the applicant's assertion (paragraph 6.1 of the Planning Design and Access Statement) that the "The proposal would make a contribution to the 5 year housing land supply on a site which has been recognised by the Council in its HELAA as being capable of providing up to 40 dwellings" and that "The development would also make a positive contribution to the local economy both in the short and long term"

Whilst it is true that the application site is considered in the most recent HELAA (version 4, January 2017) as a site suitable for development the description is: *Suitable for housing - around 40 units could be achieved in line with settlement pattern and local character also having regard to the wider lands ape. Around half the site (the north) is an Archaeological Notification Area to be investigated and there is a Public Right of Way to be safeguarded and the setting of a Listed Building opposite to be carefully considered.*

The HELAA forms part of the evidence base for identifying the distribution of development for the Vale of Aylesbury Local Plan (VALP). However, the HELAA does not allocate sites or ultimately consider whether individual sites are acceptable for development. This site was NOT taken forward within the submission version of the VALP. Furthermore, sites included in HELAA were identified by the general public at the request of AVDC and do not have any recognised planning merit.

## **2. Housing Development in smaller settlements and sustainability.**

The NPPF (July 2018) continues to support housing development in sustainable locations. In accordance with this fundamental principle, Policy D3 of the draft VALP states: -

*"Where there is no made neighbourhood plan in place, new housing development at smaller villages will be supported where it contributes to the sustainability of that village and is in accordance with all applicable policies in the Local Plan, provided that the proposed development fulfils the following criteria: -*

- a. is located within the existing developed footprint of the village or is substantially enclosed by existing built development,*
- b. would not result in coalescence with any neighbouring settlement,*
- c. is of a small scale (normally five dwellings or fewer) (net) and in a location that is in keeping with the existing form of the settlement and would not affect its character and appearance,*
- d. respects and retains natural boundaries and features such as trees, hedgerows, embankments and drainage ditches,*
- e. would not have any significant adverse impact on environmental assets such as landscape, historic environment, biodiversity, waterways, open space and green infrastructure, and*
- f. can be served by existing infrastructure*

In relation to the above, GPC objects because the proposed development would not be contributing to the sustainability of the village in general terms. The village only has 1 public house and there are no other facilities that would be supported by additional development. Travel into and out of Granborough is almost wholly dependent on the use of the private car and the proposed development will lead to an overall increase in traffic with its associated local noise and air pollution. This application does nothing to support the ideals of a transition to a low carbon future or to conserving and enhancing the natural environment and reducing pollution in fact quite the reverse as the private car is the preferred mode of transport.

With reference to the bullet points: -

- a. the proposed development site is not located within the existing developed footprint of the village and the site is not substantially enclosed by existing built development.
- b. not relevant
- c. the proposed development is certainly not small scale and substantially exceeds the "normal" allowance of five dwellings.
- d. the proposals require the removal of hedgerows and the loss of the planted open space to allow access from Sovereign Close.
- e. whilst some technical studies have been submitted in support of the application, they have been instigated and paid for by the applicant. The GPC does not share the conclusions reached in the Planning Design & Access Statement and believes that the impact will be far greater than stated.
- f. Current local infrastructure cannot provide for such a development, in particular local primary and secondary school provision is inadequate to accommodate the existing need, let alone a further increase in children of school age.

### **3. Affordable Housing**

GPC objects to the application as it fails to provide the proper amount of affordable housing. The application shows that 2 of the proposed 17 houses as being affordable housing, based on a misinterpretation of the NPPF. The application states that the site area is 1.5ha. In order for this to be compliant with AVDC's policy for schemes of 1 hectare or more are currently required to have a minimum of 30% affordable housing. For this scheme this equates to 5 affordable units.

### **4. Public Right of Way**

GPC objects to the impact this application has on the public right of way across the development site. At this time this a rural pathway across the open fields, the proposal is that part of it shall be a pavement passing though residential properties. It is considered that the impact on the Public Right of Way GRA/10/1 has been underestimated. The route will change from one of open countryside to one which looks directly on to and goes through a housing estate. In addition, the loss of the hedgerow to both Church Lane and Sovereign Close will be significant and will lead to an increase visual impact for a greater number of receptors.

## **5. Landscape Impact**

GPC objects to the adverse impact that this development would have on the landscape and character of the settlement. The landscape in this part of Aylesbury Vale comprises small villages set in open fields. It is not considered that the landscape buffer would mitigate the visual impact of the proposed new development because such landscaping would not be appropriate for the setting and context of the site. The subdivision of the field and arbitrary alignment of the development boundary with landscaping buffer set outside of the red line of the development does not form a suitable edge and boundary to the village.

The current proposal is therefore in conflict with Policy GP35 of the VALP, in particular bullet points a), d) and e).

## **6. Consistency**

GPC, in objecting to this application for the reasons set out, also wishes to see that the AVDC is consistent in its approach, in particular to be consistent with application 17/03624/AOP. This was an outline application for 17 dwellings on this same site which was refused. Another application 16/03612/APP which was for 3 houses on a greenfield site at the edge of the village was refused, and that refusal upheld on appeal.

## **7. Flooding**

GPC objects to the application as it is of the view that there has been insufficient examination and exploration of the potential for flooding to parts of the site and to the existing Sovereign Close properties. GPC would wish to see assurances from the applicant and Bucks CC that all necessary steps will be agreed and implemented to minimise, so far as is practical any increased risk of flooding as a result of the change in surface from open pasture land to hard landscaped areas.

## **8. Neighbourhood Planning**

GPC would wish the AVDV recognises that this objection has been made in consultation with the residents of Granborough following a special meeting of the PC held on 2<sup>nd</sup> January where there was overwhelming support for an objection. GPC would therefore remind AVDC that AVDC approved Granborough Parish Council's application to designate a Neighbourhood Area on 23 July 2018. This will enable the community to set out a positive vision on how they want the village to develop, ensuring the community gets the right types of sustainable development, in the right place, within the existing boundaries of the community and without affecting the beautiful landscape and character of the village. This will meet identified local need and make sense for local people, allowing new residents to integrate properly into the village community. A Neighbourhood Plan Steering Group has been established and are currently collating the evidence base for the Neighbourhood Plan. A Public Meeting was held on 19<sup>th</sup> January 2019. The VALP details that in smaller villages particular emphasis is given to the role of the local communities in identifying how best to meet their own development needs through Neighbourhood Plans.

## **Conclusion**

GPC is of the opinion that the reasons for refusal given for the previous outline planning application also apply to this proposal. There is no new evidence or change in policy approach which would suggest otherwise.

The proposal would conflict with policy GP35 of the Vale of Aylesbury Local Plan and would not constitute sustainable development. It would fail to comply with the core planning principles of the NPPF to recognise the intrinsic character and beauty of the countryside, to conserve and enhance the natural environment and to reuse land that has been previously developed. The proposal would cause harm by the significant adverse landscape character and visual impact on the area of the development site, its immediate setting and the wider area and from the Public Right of Way. The development would fail to contribute positively to, or enhance, the natural environment, causing a limited adverse impact on existing trees and hedgerows and it would not complement the character of the area or the context of its setting by reducing open land which contributes to the form and character of the area. In addition, given the site's location outside of a settlement which has a lack of key services nearby it is considered highly likely that there would be a significant reliance on the private car thus not ensuring a locationally sustainable site for development. This is contrary to the Development Plan and to advice contained in the National Planning Policy Framework and should therefore be refused.

## **Appendix 1**

A 'Combined Planning & Design & Access Statement' has been submitted for 18/04496/APP. We note that :

- 1) Paragraph 2.4 of the 'Combined Planning & Design & Access Statement' states "*This current application seeks to address these reasons for refusal as follows –*
  1. *A detailed landscaping plan and Landscaping and Visual Impact Proposal has been submitted to demonstrate that any adverse visual has been addressed. Furthermore it is noted when the site was assessed by under the AVDC Housing and Economic Land Availability Assessment (Jan 2017). The site was considered suitable for housing, for around 40 houses that could be achieved in line with the settlement pattern and local character also having regard to the wider landscape. The proposed layout has been designed to follow the existing settlement, with the southern end comprising bungalows facing Church Lane, of a similar size and scale to the existing properties fronting this side of the lane, with the remaining development (to the north) comprising a similar layout to that found on Sovereign Close."*
- 2) With regard to Point 1 of 2.4 the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) page 12 states "**The application site is considered in the most recent HELAA (version 4, January 2017). It is identified as a site suitable for development: *Suitable for housing - around 40 units could be achieved in line with settlement pattern and local character also having regard to the wider landscape. Around half the site (the north) is an Archaeological Notification Area to be investigated and there is a Public Right of Way to be safeguarded and the setting of a Listed Building opposite to be carefully considered. The HELAA forms part of the evidence base for identifying the distribution of development for the Vale of Aylesbury Local Plan (VALP). The aim of the assessment is to determine the capacity of settlements to accommodate sustainable development and the likely role of each settlement within the district. The assessment is based on a desktop audit of settlement services and facilities (on which Parish and Town Councils were consulted). However the HELAA does not allocate sites or ultimately consider whether individual sites are acceptable for development. This site has not been taken forward within the submission version of the VALP***". Sites included in HELAA were identified by the general public at the request of AVDC and do not have any recognised planning merit. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.
- 3)
- 4) Paragraph 4.6 of the 'Combined Planning & Design & Access Statement' suggests the 'Contribution to the Local Economy', "*should be afforded a moderate positive weight in the overall planning balance*" – the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 13 under 'Build a strong competitive economy' confirms "**should be awarded limited positive weight in the overall planning balance**". Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.
- 5)
- 6) Paragraph 4.8 of the 'Combined Planning & Design & Access Statement' states "*In respect of affordable housing the development falls below the 25- dwellings threshold. However, Paragraph 64 of the NPPF states that planning developments should expect at least 10% of homes on schemes of 10 dwellings or more to be available for affordable home ownership. As such, plots 5 and 6 would be offered as affordable housing units.*" However Paragraph 3.26 of the 'Combined Planning & Design & Access Statement' states "*Affordable Housing SPG(2007) and Policy Interim Position Statement (2014)*These documents sets out the Council's current

*approach to affordable housing provision and require 30% affordable housing on schemes of 25 or more dwellings or on sites of 1ha or more.*" The Application Form states that the site is 1.5ha (whilst Paragraph 1.0 of the 'Combined Planning & Design & Access Statement' states that the site is 1.3ha) which would equate to 5 affordable units not 2. This is confirmed by the Affordable Housing Development Officer in their Consultee response dated 20 December 2018.

7)

- 8) Paragraph 4.9 of the 'Combined Planning & Design & Access Statement' suggests 'Delivering a wide choice of quality homes', *"should be afforded a considerable positive weight"* in the overall planning balance – the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 13 and page 14 under 'Deliver a wide choice of high quality homes' confirms **"should be awarded moderate positive weight in the overall planning balance"**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

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- 10) Paragraph 4.12 of the 'Combined Planning & Design & Access Statement' suggests 'Promoting sustainable transport', *"should be afforded a moderate positive weight"* in the overall planning balance – the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 14 and page 15 under 'Promoting sustainable transport' confirms **"represent a reason for refusal and are therefore afforded considerable negative weight in the planning balance"**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

11)

- 12) Paragraph 4.18 of the 'Combined Planning & Design & Access Statement' states that for 'Conserving and enhancing the natural environment', *"Overall it is considered that in the long term the affect that the development would have upon the natural environment and the adjacent landscape would be neutral to positive. In the planning balance it is considered that these matters should be afforded neutral weight"* – the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 15 and page 16 under 'Conserving and enhancing the natural environment' states under 'Settlement Character', **"The site aids in creating the backdrop to the village on its western edge and forms part of a wider network of fields extending out into the open countryside. The proposed development will change the localised landscape character but will also impact on the character of the settlement. The Landscape Officer is concerned that the development would lead to an extension of built form into the open countryside that would adversely impact the rural identity and character of the western edge of the village which will also affect the predominantly linear form of settlement which has existing over many years. In summary, the development would lead to an extension of the built form into the open countryside and would adversely impact the rural identity and character of the western edge of the village. As such it would result in a permanent and significant adverse landscape and visual effect to the site and its immediate setting. This matter should therefore be afforded significant adverse weight in the overall planning balance"**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

13)

- 14) In addition the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 21 under 'Impact on Public Right of Way' states **"the development will have an impact in terms of users of the footpath and their perception of the landscape they are traversing through, it will no longer be a rural/village fringe with the experience of the open countryside but will now feel more urbanised as the footpath becomes a pavement for some of its length before linking to Church Lane. While the impact on the access and alignment to the footpath will be limited the change in the setting of the footpath from one in the open countryside to a more urban route will be dramatic and it is therefore considered that considerable harm will be caused. This should be afforded considerable negative weight in the overall planning**

**balance**". Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

15)

- 16) Also the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 2 states **"development on this site would not complement the physical characteristics of the site and the surroundings, Granborough's historic scale and context of the village setting. In respect of conserving and enhancing the natural environment, the proposal is likely to result in significant adverse landscape character and visual impacts on this site and immediate context through the urbanisation of the site and effect on users of the extensive rights of way network in the vicinity"** and on page 9 states **"Concerns this development would lead to an extension of the built form into the open countryside and would adversely impact the rural identity and character of the western edge of the village. Conclude that the proposed development would result in permanent significant adverse landscape and visual effects to the site and its immediate setting, and it should be considered in the planning balance on this basis"**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

17)

- 18) Paragraph 6.1 of the 'Combined Planning & Design & Access Statement' states *"The proposal would make a contribution to the 5 year housing land supply on a site which has been recognised by the Council in its HEELA as being capable of providing up to 40 dwellings. this is a matter that should be afforded significant weight in the planning balance. The development would also make a positive contribution to the local economy both in the short and long term a matter to which moderate weight should be attributed."* – the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 2 para 2 states **"given the current substantial 5 year supply and relatively small scale of the proposal and therefore it is afforded moderate positive weight in the overall planning balance"**.

19)

- 20) In addition the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) page 12 states **"The application site is considered in the most recent HELAA (version 4, January 2017). It is identified as a site suitable for development: *Suitable for housing - around 40 units could be achieved in line with settlement pattern and local character also having regard to the wider landscape. Around half the site (the north) is an Archaeological Notification Area to be investigated and there is a Public Right of Way to be safeguarded and the setting of a Listed Building opposite to be carefully considered.* The HELAA forms part of the evidence base for identifying the distribution of development for the Vale of Aylesbury Local Plan (VALP). The aim of the assessment is to determine the capacity of settlements to accommodate sustainable development and the likely role of each settlement within the district. The assessment is based on a desktop audit of settlement services and facilities (on which Parish and Town Councils were consulted). However the HELAA does not allocate sites or ultimately consider whether individual sites are acceptable for development. This site has not been taken forward within the submission version of the VALP."** Sites included in HELAA were identified by the general public at the request of AVDC and do not have any recognised planning merit.

21)

- 22) The Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 13 under 'Build a strong competitive economy' confirms **"should be awarded limited positive weight in the overall planning balance"**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

23)

- 24) Paragraph 6.2 of the 'Combined Planning & Design & Access Statement' states *"As the proposal is for the development of a greenfield site it would clearly have an adverse impact upon the immediate area. However, this would be limited to the immediate locality and therefore, in the*

*overall planning balance should only be afforded limited negative weight. The proposal would not have any adverse effects upon the setting of the listed farmhouse to the north.”* The Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 15 and page 16 under ‘Conserving and enhancing the natural environment’ states under ‘Settlement Character’, **“The site aids in creating the backdrop to the village on its western edge and forms part of a wider network of fields extending out into the open countryside. The proposed development will change the localised landscape character but will also impact on the character of the settlement. The Landscape Officer is concerned that the development would lead to an extension of built form into the open countryside that would adversely impact the rural identity and character of the western edge of the village which will also affect the predominantly linear form of settlement which has existing over many years. In summary, the development would lead to an extension of the built form into the open countryside and would adversely impact the rural identity and character of the western edge of the village. As such it would result in a permanent and significant adverse landscape and visual effect to the site and its immediate setting. This matter should therefore be afforded significant adverse weight in the overall planning balance”**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

25)

- 26) In addition the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 21 under ‘Impact on Public Right of Way’ states **“the development will have an impact in terms of users of the footpath and their perception of the landscape they are traversing through, it will no longer be a rural/village fringe with the experience of the open countryside but will now feel more urbanised as the footpath becomes a pavement for some of its length before linking to Church Lane. While the impact on the access and alignment to the footpath will be limited the change in the setting of the footpath from one in the open countryside to a more urban route will be dramatic and it is therefore considered that considerable harm will be caused. This should be afforded considerable negative weight in the overall planning balance”**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

27)

- 28) Also the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 2 states **“development on this site would not complement the physical characteristics of the site and the surroundings, Granborough’s historic scale and context of the village setting. In respect of conserving and enhancing the natural environment, the proposal is likely to result in significant adverse landscape character and visual impacts on this site and immediate context through the urbanisation of the site and effect on users of the extensive rights of way network in the vicinity”** and on page 9 states **“Concerns this development would lead to an extension of the built form into the open countryside and would adversely impact the rural identity and character of the western edge of the village. Conclude that the proposed development would result in permanent significant adverse landscape and visual effects to the site and its immediate setting, and it should be considered in the planning balance on this basis”**. Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

29)

- 30) Paragraph 6.3 of the ‘Combined Planning & Design & Access Statement’ states *“The proposal accords with the other relevant core planning principles of the NPPF namely, promoting of sustainable transport, preserving residential amenities, promoting healthy communities, and meeting the challenge of climate change and flooding risks; all matters which it is considered should be afforded neutral weight in the planning balance on the basis that these matters represent an absence of harm as opposed to benefits to the wider area.”* - the Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) on page 14 and page 15 under

'Promoting sustainable transport' confirms "**represent a reason for refusal and are therefore afforded considerable negative weight in the planning balance**". Nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.

31)

- 32) Paragraph 6.4 of the 'Combined Planning & Design & Access Statement' states "*When all of the above factors are weighed up in the overall planning balance, it is clear that any adverse effects of the proposal would not significantly or demonstrably outweigh the benefits. Therefore, in accordance with the presumption in favour of sustainable development contained in paragraph 14 of the Framework it is respectfully requested that the application be approved.*"

33)

- 34) **It is very clear from all of the evidence above contained in this Parish Council Objection document that there are NO benefits to this application for the village of Granborough and all of the effects are adverse. There is simply nothing sustainable about planning application 18/04496/APP and it is clearly only a partial development of a larger site. The Case Officer Report and Recommendation for 17/03624/AOP (19.1.2018) was categoric in its refusal and nothing has changed between 19.1.2018 when 17/03624/AOP was refused and application 18/04496/APP.**

35)

- 36) Finally we also note that the 'Combined Planning & Design & Access Statement' incorrectly states "*as this is an outline application*" in paragraph 4.20 and in paragraph 6.0 contains an inaccurate reference to Paragraph 14 of the NPPF.