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PLANNING STATEMENT

**LAND AT ST BENETS, HIGH STREET,
ABBOTS BROMLEY**

JUNE 2016



Site Address:

Land at St Benets, High Street, Abbots Bromley, Staffordshire,

Applicant:

ASD Unlimited

Proposal:

Alterations and extension to existing buildings to form 10no. dwellings with associated car parking to rear, demolition of various lean-to extensions and refurbishment and alteration of Low Door Cottage

Planning Statement:

Date Issued: 28th June 2016

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Report Prepared By:

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1 Introduction

- 1.1 Rob Duncan Planning Consultancy Ltd. has been instructed by ASD Unlimited to prepare a Planning Statement to accompany an application for full planning permission for alterations and extensions to the former St Benet's Dormitory, High Street, Abbots Bromley, to form 10no. dwellings, along with extensions and refurbishment of the existing dwelling known as Low Door Cottage.
- 1.2 A description of the proposed development is set out below. Please note that a separate application has been made in respect of Argyll House, Stretton Cottage and Gardener's Cottage (Plots 1 – 3) adjacent as these are already in residential use and are not linked to the St. Benet's dormitory/Low Door Cottage range of buildings.
- 1.3 The alterations proposed to Low Door Cottage (labelled as Plot 4) encompass the creation of a new window opening at first floor level on the rear elevation, and the provision of a new ensuite bathroom to serve bedroom 1. This is an existing dwelling and will remain as a two bedroomed cottage, with lounge, kitchen, dining room at ground floor and two bedrooms and bathroom at first floor.
- 1.4 The alterations to create Plot 5 encompass the demolition of an existing lean-to extension at the rear of the property, the erection of two storey rear extension to provide a kitchen diner at ground floor, with a second bedroom and bathroom at first floor, and the creation of a new entrance door within an existing window opening to provide pedestrian access onto High Street. The resultant dwelling will comprise of a lounge, kitchen/diner and w/c at ground floor with two bedrooms and family bathroom at first floor.

- 1.5 The alterations to create plots 6, 7 and 8 encompass a three storey gabled extension to the rear of the building, insertion of new windows and doors in the rear elevation, removal of various internal stud walls, creation of new staircase and installation of rooflights in order to form 3no. flats, each comprising a lounge/kitchen, two bedrooms, family bathroom and hallway. Pedestrian access to High Street will be retained via the existing doorway opening.
- 1.6 The alterations to form plots 9 and 10 entail the erection of a two storey rear extension, and the creation of a new pedestrian access onto High Street formed from an existing window opening to serve the ground floor flat. The resultant flats will each benefit from a lounge/kitchen, bathroom, hallway and two bedrooms (one ensuite).
- 1.7 The proposals to create plots 11 and 12 encompass alterations to the existing link block that connects with the buildings either side. The application proposes to raise the ridge of this section of the building by 950mm, introduce two front facing pitched roof dormer windows, and the erection of a two-storey extension across the rear of the building. Each resultant flat will comprise of a lounge/kitchen, two bedrooms (one ensuite) and bathroom.
- 1.8 The alterations to form plots 13 and 14 encompass the demolition of an existing lean-to to the rear, and the erection of a part two storey, part single storey rear extension. A new side facing dormer window will also be created. The resultant flats will each benefit from a lounge/kitchen, two bedrooms (one ensuite) and family bathroom.
- 1.9 In the case of all plots, the application proposes the provision of replacement double glazed windows to match the existing, replacement of all roofs and lead flashings and the repointing of chimneys. Existing tiles are to be reused,
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with matching new tiles used to supplement where necessary. General repointing of brickwork will also be undertaken where necessary.

- 1.10 Pre-application discussions have been entered into with the Local Authority where it was confirmed that the principle of development is acceptable owing to the location of the site within a Tier 2 village. The Local Authority also recognised that the proposed development would ensure the longevity of the buildings which make an important contribution to the Conservation Area. The pre-application discussions concluded that the most significant views of the site are from the High Street, and that there would be little views of the proposed works to the rear. Concerns were nevertheless raised in respect of the proposed alterations to the existing link block to form plots 11/12. The Local Authority considers the scale and architectural composition of the existing structure to be important and an integral part of the character of this group of buildings. The proposed parking area was considered acceptable and would have a minimal impact on the Conservation Area.

2 Site & Surroundings

- 2.1 The application site comprises a range of buildings which were previously owned by the Abbots Bromley School, and which were used for a variety of uses including offices, teaching and as a dormitory. The range of buildings the subject of this application are sited on the road frontage, on the southern side of High Street. To the north of the site lies the main campus of the Abbots Bromley School. The eastern boundary comprises an existing vehicular access which serves a further part of the Abbots Bromley School campus, beyond which there is residential development. The southern boundary of the site backs on the school swimming pool, whilst the western boundary borders with further residential development. The site occupies a sustainable location within easy walking and cycling distance of the

numerous services and facilities on offer within the village and lies within the defined settlement boundary and within the Abbots Bromley Conservation Area.

3 Planning Policy

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan taking into consideration any material considerations relevant to the determination of the application. The Development Plan for this area comprises the East Staffordshire Local Plan (2012-2031), of which the following policies are of relevance:
- 3.2 Policy SP1 of the Local Plan states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The Council will always seek to work proactively with applicants to find solutions which result in the approval of development proposals wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 3.3 Policy SP2 of the Local Plan sets out the settlement hierarchy for the Borough, identifying Abbots Bromley as a Tier 2 village. These are defined as 'Local Service Villages' which meet local needs by providing a more limited range of facilities and services which sustain rural life. Such villages will accommodate limited development over the plan period, with Abbots Bromley assigned 40 dwellings (paragraph 2.23 of the Local Plan refers). The delivery of this new housing is to be via windfall sites within the settlement boundary, and/or the allocation of small sites on the edges of the village.

3.4 Policy SP17 of the Local Plan states that residential development comprising of 4 or more new dwellings, or on a site of 0.14 hectares or above, shall provide up to 40% affordable housing on the site.

3.5 Policy SP24 of the Local Plan states that development proposals must contribute positively to the area in which they are proposed and (amongst others):

- *Help to create a sense of place, building on the urban, suburban, and rural local character, respecting local patterns of development and the historic environment and using heritage assets to their best advantage;*
- *Provide safe communities through appropriate use of clearly defined public and private spaces, passive surveillance and active frontages;*
- *Reinforce character and identity, through local distinctiveness;*
- *Present an appropriate layout for new development that integrates with the existing environment and context, including space around dwellings, public and private space and open spaces;*
- *Be adaptable in order to enable a change of uses where this is possible*

3.6 Policy SP24 adds that development proposals should reflect the existing density of its locality and therefore its character and form. Intensification of an existing built area will only be allowed where the development would represent a benefit and would not be harmful to the character and amenity of an area.

3.7 Policy SP25 of the Local Plan states that development proposals should protect, conserve and enhance heritage assets and their settings, taking account of their significance, as well as the distinctive character of the Borough's townscapes and landscapes. Development proposals that are likely to have a negative impact on the historic environment should demonstrate how harm can be effectively and justifiably mitigated.

3.8 Policy SP35 of the Local Plan states that the Council is committed to developing a well-integrated community connected by a sustainable transport system which connects people to jobs, services and community facilities. This will be achieved by encouraging the use of sustainable modes of transport along with other measures.

3.9 Policy DP1 of the Local Plan states that planning permission will normally be granted for development which responds positively to the context of the surrounding area and in itself exhibits a high quality of design and is compliant with the East Staffordshire Design Guide. In assessing the design of development proposals the following factors will be taken into account:

- *The layout of the development in terms of its circulation routes and arrangement of buildings and how they relate to such factors in the surrounding area, including the pattern of settlements;*
- *How the design of the development responds to the historic environment context and conserve and enhance heritage assets, including their setting;*
- *How elements of any open spaces, both hard and soft, in the proposed development relate to each other, the proposed buildings, the characteristics of the site and the surrounding landscape's character and appearance, including appropriate public realm;*

- *The density and mix of the development in relation to its context and the uses to which the development will be put;*
- *The massing of the development in terms of the shape, volume and arrangement of the building or buildings in relation to the context of the development;*
- *How the height and massing of the proposed development relates to the height of surrounding development and any vistas, views or skylines;*
- *Materials to be used within the development and how they interrelate with each other, their immediate and overall context and any traditional and vernacular materials uses in the area;*
- *The detailing and construction techniques to be used in the development and how they interrelate with each other and relate to the immediate and overall context;*
- *The impact on the amenity of occupiers of nearby residential properties in terms of loss of light, outlook or privacy;*
- *The extent to which the design of the development takes into account the safety of users and reduces the potential for crime to occur in accordance with Designing out Crime guidance.*

3.10 Policy DP1 also states that the design and layout of parking areas will be required to minimise visual impact on the area, in particular to minimise impact on public facing frontages, should incorporate appropriate landscaping, should provide clearly demarcated bays and safe pedestrian

routes, make adequate provision for disabled users and cyclists and incorporate any required lighting sensitively.

3.11 Policy DP3 of the Local Plan states that planning permission for new residential development will normally be granted where the following criteria are met:

- *The design and layout would not result in overlooking between principal windows of dwellings;*
- *The development would not result in a material loss of light to principal windows or the private amenity space of adjacent dwellings;*
- *The development would not have an unacceptably overbearing impact on adjacent dwellings;*
- *The design and layout allows outdoor domestic activities to be undertaken in reasonable privacy, bearing in mind the type of dwelling and likely household size of both the existing surrounding dwellings and the proposed dwelling.*

3.12 Policy DP5 of the Local Plan states that the significance of the Borough's historic environment and heritage assets will be protected and enhanced where new development proposals will be expected to make a positive contribution to the fabric and integrity of existing buildings, conservation areas or other non-designated areas where there is a distinctive character, strategic views or a sense of place. The policy goes on to state that development will be permitted in Conservation Areas, including the demolition of existing buildings or structures, where it can be demonstrated

that it would protect and enhance the character and appearance, including the setting of the Conservation Area. It will be expected that any new development within or adjacent the Conservation Area will respect the existing character in terms of scale, form, materials and detailing. Key views into and out of the Conservation Area will remain uninhibited.

4 Other Material Considerations

National Planning Policy Framework / National Planning Practice Guidance

- 4.1 The National Planning Policy Framework and its accompanying National Planning Practice Guidance place a strong emphasis on promoting sustainable development and seek to significantly boost the supply of housing nationally. They furthermore state that housing applications should be considered in the context of the presumption in favour of sustainable development. The documents also set out guidance in respect of securing high quality design, safeguarding heritage assets, reusing previously developed land, ensuring highway safety, and delivering affordable housing. The content of these documents is explored in more detail, where relevant, in the Planning Assessment below.

5 Planning Assessment

Principle of Development

- 5.1 The application proposes the conversion, alteration and extension of an existing range of buildings on the site to form 10no. dwellings, along with the refurbishment and extension of Low Door Cottage. Policy SP2 of the Local Plan sets out the settlement hierarchy for the Borough and identifies Abbots Bromley as a Tier 2 village within which local housing needs are to be addressed through the provision of 40 new dwellings.

- 5.2 The village benefits from a variety of local services and facilities, including numerous public houses/restaurants, and a variety of retail outlets including a butchers shop and newsagents. The village also benefits from relatively frequent public transport connections to Uttoxeter and Burton-upon-Trent.
- 5.3 The application site furthermore lies within the defined settlement boundary for the village, and involves the reuse of existing buildings. As such the principle of development is considered to be entirely acceptable. My conclusion in this regard is reinforced by the positive support for the principle of development given by the Local Authority during pre-application discussions.

Impact on the Character of the Area

- 5.4 Policies SP24, SP25, DP1 and DP5 of the Local Plan set out the Local Authority's approach to securing high quality design and safeguarding heritage assets. This site is acknowledged to lie within the Abbots Bromley Conservation Area which in itself constitutes a Heritage Asset. The site also lies opposite a number of Listed Buildings. Careful consideration has therefore been given to the design and appearance of the proposed development in order to safeguard these heritage assets.
- 5.5 The Abbots Bromley Conservation Area Appraisal sets out the defining characteristics of the area, noting that it is characterised by a linear, softly curving street, with old buildings and attractive frontages lining the main road. The combination of these tightly clustered properties along the road frontage with their locally manufactured building fabric of brick and plain clay tiles, and predominantly two-storey character, lends the village its distinctive and attractive vernacular character.

- 5.6 During pre-application discussions the Local Authority has been positive in its views about the proposal, noting in particular that it will ensure the longevity of the buildings which they consider to make an important contribution to the Conservation Area. Indeed, it is noted in this regard that the easternmost section of the range of buildings on this site (comprising plots 9-14 inclusive) is identified as being a building of townscape merit within the Conservation Area Appraisal.
- 5.7 The majority of the works proposed in this application are consolidated to the rear of the range of buildings, away from public view. This includes extensions to the rear of the existing buildings, utilising a palette of materials and detailed design that respects and reinforces the character of the buildings, the demolition of some of the poorer quality lean-to extensions, and the creation of some new openings. The front elevation facing High Street sees only nominal changes to the majority of the buildings, with two new door openings provided by enlarging existing window openings, along with the replacement/refurbishment of existing windows and doors, the provision of new lead flashing and repointing of brickwork where required. These works will facilitate the use of the buildings for residential use, and will collectively enhance the external appearance of this range of buildings to the benefit of the Conservation Area.
- 5.8 The main area of concern for the Local Authority during pre-application discussions was the alterations proposed to create plots 11/12. The existing building comprises a 1½ storey link block, some 2m deep that occupies a position set back from the frontage buildings on either side. It adopts a symmetrical elevation on its northern side, with two small non-standard windows set either side of a central doorway. The application proposes to raise the ridgeline of this section of building by 950mm in order to facilitate the provision of accommodation at first floor level. Inserted into the new

roofspace will be two dormer windows, positioned symmetrically on either side to respect the symmetry of the existing front elevation. A two-storey extension is also proposed to the rear, but as this will be located away from public view it will not have any notable impact on the character and appearance of the streetscene or the wider Conservation Area.

- 5.9 The Local Authority had expressed concerns that the scale and architectural composition of the existing link building are an important and integral part of the character of this group of buildings, and that the raising of the ridgeline would cause harm to the Conservation Area.
- 5.10 In my view, the link block has a somewhat discordant appearance when one considers the characteristics of the surrounding area. The Conservation Area Appraisal identifies that the majority of buildings within the Conservation Area are two storeys in height. The link block is at odds with this predominant character. It also has a large expanse of unrelieved brickwork between the top of the windows and the eaves line which gives it an awkward, somewhat discordant appearance that in my view does not reinforce or contribute positively to the character and appearance of the Conservation Area.
- 5.11 The proposed alterations to this part of the range of buildings would retain the set back position of the link block, and would furthermore retain a subservient ridgeline to the buildings either side. The introduction of two dormer windows in a symmetrical fashion to reflect the windows below is furthermore considered to represent an enhancement to the building. Dormer windows can be found throughout the Conservation Area, including within this range of buildings, and the style of dormer window proposed is reflective of those within the locality. Most significantly, the introduction of the dormer windows will serve to improve the relationship of the large area

of unrelieved brickwork above the ground floor windows to the character of the area, giving the building a cottage style appearance that is much more in-keeping with the attractive vernacular character of the local area.

- 5.12 On approach to the site along High Street from the east, the changes to the building will not be noticeable until almost alongside, owing to the set back position of the building. Likewise on approach from the west along High Street, there will be no adverse impact on the important vista identified within the Conservation Area Appraisal, again owing to the set back position of the building. The building will furthermore remain subservient to the buildings either side, will encompass sympathetic detailing that reinforces the character of the wider Conservation Area, and will remove the discordant appearance created by the large area of unrelieved brickwork beneath the eaves line.
- 5.13 Overall, I consider that the impact of the works proposed to this section of building, and indeed the development as a whole, will give rise to *less than substantial harm* to the significance of the Abbots Bromley Conservation Area and nearby Listed Buildings as heritage assets. Paragraph 134 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 5.14 Redundancy is a significant threat to buildings and securing a viable end use is important to ensuring their long-term preservation. This is recognised by the Local Authority who have confirmed that the development will secure the longevity of the existing buildings. I submit that such benefits weigh heavily in favour of the proposed development, for without a viable end use they will

continue to fall into disrepair, which in turn will detract from the character and appearance of the Conservation Area.

5.15 The proposed development will also derive a number of other public benefits. Paragraph 7 of the NPPF identifies three dimensions to sustainable development: economic, social and environmental. These roles are mutually dependant and should be jointly sought to achieve sustainable development.

5.16 In terms of the economic and social dimension of sustainable development it is considered that the proposal will derive significant benefits to the local economy, both to local tradesmen during the construction phase, and through the expenditure associated with the creation of 10 additional households. The proposal will also secure the delivery of new dwellings to help contribute to the delivery of new housing within the District, including the identified local need for this village. Such social and economic benefits are considered to be worthy of significant weight. I reach this conclusion having regard to the conclusions of a Planning Inspector in determining appeal reference APP/B3438/A/14/2217581 at Mount Pleasant Farm, Gillow Heath (copy enclosed as Appendix A). In allowing the appeal for the erection of one dwelling in the Green Belt the Planning Inspector commented as follows:

"16. The Council have confirmed they cannot demonstrate a five-year supply of deliverable housing sites. The proposal would add to the local housing stock and make a positive, albeit modest, contribution towards reducing the current deficit of housing in the area. This is a clear economic and social benefit associated with the scheme to which I attach significant weight"

(my emphasis)

- 5.17 This application proposes the creation of 10 new dwellings, and as such the economic and social benefits that will be derived from the proposal should be afforded significant weight in favour of the proposed development having regard to the aforementioned appeal decision.
- 5.18 The proposal will also deliver a number of material benefits in the context of the environmental dimension of sustainable development. The proposal will deliver a high quality design that responds positively to its surrounding context, and as discussed above will secure the comprehensive refurbishment and enhancement of the existing buildings, providing them with a beneficial reuse that will help to sustain the buildings in the longer term. The site also occupies a sustainable location in relation to local services and facilities and thus future occupiers of the dwellings will not be reliant upon the car as their sole means of transport.
- 5.19 The proposal also involves the reuse of previously developed land. The range of buildings within this application, aside from Low Door Cottage, was previously used for educational purposes associated with the Abbots Bromley School. As a consequence the majority of this existing range of buildings constitutes previously developed land. Paragraph 111 and Core Planning Principle 8 of the NPPF state that planning decisions should encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value. This proposal will safeguard the existing buildings on the site and reuse them in a positive manner, deriving a number of benefits as discussed above. The proposal will furthermore lessen pressure for new residential development to be undertaken elsewhere within the village either by way of infill or new build developments on its fringes. Such benefits are considered to be worthy of significant weight in favour of the proposed development.

5.20 I submit that the aforementioned benefits, both individually and collectively, lend significant weight in favour of the proposed development and that they serve to clearly outweigh the less than substantial harm to the significance of the Conservation Area and nearby Listed Buildings as heritage assets arising from the alterations to the link block building. This leads me to conclude that the proposed development accords with the provisions of policies SP24, SP25 and DP1 of the Local Plan.

Neighbouring Amenity

5.21 Policy DP3 of the Local Plan sets out the Local Authority's approach to assessing the impact of new development on the amenity of neighbouring and future occupiers of dwellings. The range of buildings the subject of this application are located to the east of existing residential properties (also owned by the applicant) and are bordered to the north and south by buildings associated with the Abbots Bromley School. The only adjacent neighbouring residential property is the one to the east beyond the existing access drive serving the site and the school.

5.22 The application proposals have been carefully designed to ensure that the resultant development does not give rise to any harm to the amenity of neighbouring residential occupiers or future occupiers of the proposed dwellings. The alterations to form plots 13 and 14 entail the creation of a new window at ground floor level facing towards the neighbouring property, but as this will be replacing an existing single storey structure that already had a side facing window, I submit that there will be no greater impact on neighbouring amenity than that which already occurs. The creation of a new dormer window in the east elevation will look towards the neighbouring property, but since there are no principal windows in the side elevation, I submit that there will be no adverse harm to its occupants.

5.23 In all other respects the development has been designed to avoid conflict between the new dwellings/flats in terms of the 45 degree standard and courtyard spaces are to be provided to the rear of the buildings to provide areas of amenity space. Further amenity space will be available in the large landscaped area to the rear. I therefore consider that the proposed development will not give rise to harm to neighbouring residential amenity, or the amenity of future occupiers. The proposal accordingly meets the requirements of policy DP3 of the Local Plan.

Affordable Housing

5.24 Policy SP17 of the Local Plan sets out the Local Authority's thresholds for the provision of affordable housing. Whilst the submitted proposal exceeds the defined thresholds under policy SP17, I note the provisions of paragraph 3.121 of the Local Plan which states that local policy for affordable housing should comply with national policy.

5.25 National Policy on the matter of Affordable Housing is set out in the National Planning Practice Guidance (Paragraph 031 - updated 19/5/16). This document confirms that there are specific circumstances where contributions for affordable housing and tariff style planning obligations should not be sought from small-scale and self-build development. The guidance confirms that contributions should not be sought from developments of 10 units or less. This follows on from a recent Court of Appeal Judgment relating to the matter.

5.26 The submitted proposal incorporates a net increase of 10 dwelling units on the site, and as such does not exceed the threshold set out within the National Planning Policy Guidance (NPPG). The NPPG represents the Government's most up-to-date policy position and is a material consideration of the highest weight. By contrast the Local Authority's adopted policy is in

conflict with the NPPG and as such should be afforded lesser weight in the determination of this application. This leads me to conclude that no affordable housing provision should be required on this site.

Highway Safety

- 5.27 The application proposes the provision of a new vehicular access off the existing access into the school grounds at the easternmost end of the site (over which the applicant has an agreed right of access), which will lead into a landscaped parking area comprising of 14 parking spaces. This existing access is understood to operate on the basis of a one-way system, exiting onto High Street to the southeast. The access serving the residential development will also operate on the basis of a one-way system, with vehicles entering the site via the existing vehicular access at the eastern end of the site, and exiting via a revised vehicular access alongside Argyll House. The submitted Highway Report prepared by the project architect demonstrates how adequate visibility can be achieved from this access on egress to meet the requirements set out by the Local Highway Authority. This involves re-designing and lowering the frontage boundary wall and pillars to accommodate a new splay.
- 5.28 The level of parking proposed is considered to be acceptable, having regard to the fact that only Argyll House currently has any off-road parking provision. The remainder of the existing properties (Stretton Cottage, Gardeners Cottage, and Low Door Cottage) do not have any off road parking provision. By resultant effect, any vehicles associated with those properties have to park on High Street. The provision of dedicated parking for each dwelling to the rear of the site, including provision for the existing dwellings which do not currently have off-street parking is considered to constitute betterment in terms of highway safety, and will help to alleviate the existing on-street parking problems that the village experiences.
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5.29 In respect of highway safety, paragraph 32 of the NPPF states that:

“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”. (my emphasis)

5.30 In my view, the provision of new off-street parking to serve the proposed development, utilising a one-way system, represents an appropriate highway solution that will derive benefits to highway safety in the locality by lessening the demand for on-street parking. The level of parking provision proposed is also considered to be acceptable having regard to the sustainable location of this site within easy walking and cycling distance of local services and facilities and the availability of regular public transport connections to the wider area. I therefore submit that the proposed development will not give rise to harm to highway safety and thus accords with the provisions of policy SP35 of the Local Plan and paragraph 32 of the NPPF.

6 Conclusion

6.1 Paragraph 186 of the NPPF states that local planning authorities should approach decision taking in a positive way to foster the delivery of sustainable development. It goes on to state in paragraph 187 that local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.

6.2 This proposal is considered to constitute a sustainable form of development that is acceptable in planning terms having regard to the following conclusions:

- *The application site lies within the settlement boundary of Abbots Bromley;*
- *Abbots Bromley is a Tier 2 village which has been assigned a housing requirement of 40 dwellings over the plan period;*
- *The provisions of the NPPF mean that the proposal should be determined in accordance with the presumption in favour of sustainable development;*
- *The site lies within easy walking and cycling distance of local services and facilities and benefits from regular public transport connections nearby;*
- *The proposal is a high quality design that involves the reuse, refurbishment and extension of existing buildings, and will safeguard the character and appearance of the Conservation Area;*
- *The proposed alterations to the existing link block are considered to give rise to 'less than substantial harm' to the significance of existing heritage assets, and that there are numerous public benefits that serve to outweigh its impact;*
- *The proposal will not detract from the amenity of neighbouring residential occupiers;*
- *The proposal will not give rise to any substantive highway safety impacts;*
- *No affordable housing provision is required, having regard to the most up-to-date policy position set out by the Government.*

- 6.3 For these reasons the proposed development is considered to accord with the provisions of policies SP2, SP24, SP25, SP35, DP1, DP3 and DP5 of the East Staffordshire Local Plan (2012-2031) and guidance contained within the National Planning Policy Framework and National Planning Practice Guidance.
- 6.4 The Local Planning Authority is therefore respectfully requested to grant full planning permission for the proposed development in accordance with the presumption in favour of sustainable development set out within policy SP1 of the Local Plan and the National Planning Policy Framework.