



**Professional Planning and Development**  
Member of the Royal Town Planning  
Institute



**Planning Representation made by**  
**Barrowford Parish Council**  
**to planning application reference 21/0949/FUL**

**January 2022**

## 1. Purpose and scope

1.1 Fitzgerald Planning & Design have been commissioned by Barrowford Parish Council to undertake an independent review and form representations to planning application 21/0949/FUL which has been submitted by Castle Green Homes for the erection of 257 new dwellings on land off Pasture Lane, Barrowford.

1.2 The review will focus on the following:

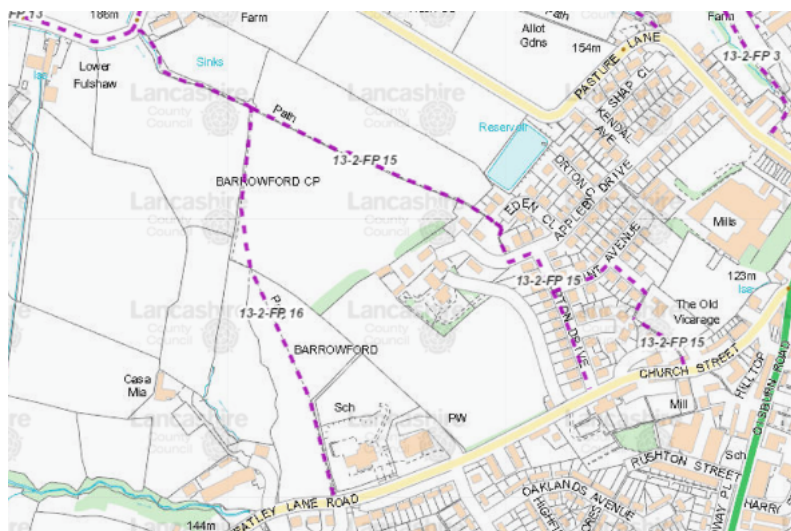
- Policy Context (local and national)
- Principle of the development

Other material planning considerations

- Design and layout
- Highways and parking
- Trees and ecology
- Landscape impact
- Social Infrastructure
- Affordable housing
- Drainage

## 2.0 Procedural matters

Before outlining the concerns of the Parish Council with regard to the scheme as a whole, it is noted that the proposed development, if approved, would appear to require the diversion of public right of way 13-2-FP 16 and may also impact on the line of footpath 13-2-FP 15. The position of the respective paths is shown in the map excerpt below from Lancashire County Council's 'MARIO' system.



Source: [www.mario.lancashire.gov.uk](http://www.mario.lancashire.gov.uk)

The application for planning permission dated 30.11.2021, indicates at Question 8 that no such diversions are necessary and the Council's subsequent advertising of the development by way of site and press notices on the 13<sup>th</sup> and 14<sup>th</sup> of December 2021

appear to make no reference to this matter, despite the requirements of the Town and Country Planning (General Development Procedure) Order 1995.

Accordingly, the application form should be revised by the Agent to clarify this matter and any public notices displayed by the Council should be re-advertised to indicate that the scheme does affect a PROW.

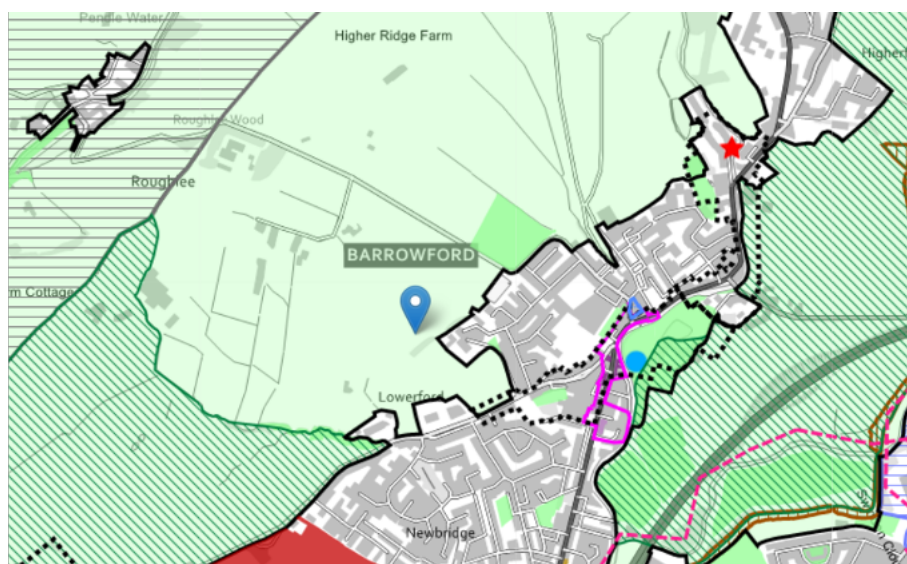
### 3.0 Grounds of objection

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the adopted development plan, unless material considerations indicate otherwise. These requirements are repeated within the National Planning Policy Framework (NPPF 2021) which sets out the Government's planning policies and details how they should be applied.

The Parish Council's objections relate to both the principle of development and a number of associated material considerations, which will be outlined and expanded upon in this response.

### 3.1 Local policies

The adopted development plan in question is the Pendle Local Plan Part 1: Core Strategy ('the Core Strategy') and the relevant policies of the Barrowford Neighbourhood Plan. Pendle Council's proposals map (as replicated in the Neighbourhood Plan map) confirms that the application site lies beyond the defined settlement boundary for Barrowford, within the Open Countryside and in close proximity to the boundary of the Forest of Bowland AONB which lies to the north (see Local Plan proposals map excerpt below).



The Borough Council are in the process of preparing Part 2 of the Local Plan ('Site Allocations and Development Management Policies') which will expand on the Part 1:

Core Strategy, allocating land for future development and providing an updated suite of policies to reflect the Council's strategic vision.

On the 25<sup>th</sup> November 2021, the Publication Report of the Part 2 document was presented to the Council's Policy and Resources Committee for consideration, before being referred to Full Council on the 9<sup>th</sup> December 2021. Agreement was sought from Members to consult on this preferred version of the Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, before submission to the Secretary of State and the subsequent 'Examination in Public' process.

Within the Officer report which was presented to the respective Committees, it was recommended that Members accept a housing figure of 240 dwellings per annum (which has been used in the preparation of the Publication Report), above that of 142 dpa which is arrived at when using the Government's 'Standard Methodology' for the Borough. The higher figure was sought to reflect economic growth in Pendle and to align with the aspirations set out in the Part 1 document.

At the Full Council meeting on the 9<sup>th</sup> December 2021, Members resolved the following:

- That a housing number of 142 be agreed for the Pendle Local Plan Part 2
- That officers re-visit the Core Strategy and Pendle Local Plan Part 2 and its supporting policies in order to protect greenfield sites

It is understood that due to this resolution, further consultation and work on the evidence base supporting the Part 2 document will be required, delaying its potential adoption for an indeterminate period of time. Accordingly, in line with paragraph 48 of the National Planning Policy Framework and the stage of preparation of the emerging Part 2 Plan, it cannot be afforded significant weight in the determination of this application. Therefore the policies listed below, as contained within the Core Strategy, Neighbourhood Plan and the Framework are relevant to the determination of the scheme at Pasture Lane.

It should also be noted that owing to its age, the Council undertook a review of the Core Strategy in December 2020 to test the relevance and consistency of its policies with those of the Framework. The Review found that the majority of its policies remained consistent with the Framework but highlighted areas where any lack of conformity arises. This will be discussed against the relevant policies below.

### **3.2 Local Plan Part 2 site selection and assessment**

The application site was considered as a potential housing allocation in the preparation of the emerging Part 2 document. However, it has not been carried forward (amongst other alternatives) with the Council confirming that they "*do not believe that these sites are best placed to meet our development needs up to 2030*".

In scoring the site within its Sustainability Appraisal, the Council confirmed the following likely effects of a housing allocation:

- Increased pressure on services and facilities, including health;
- Its distance from transport services;

- Existing, known capacity road capacity issues on Pasture Lane (with the suggestion that an alternative access route would be needed);
- High risk of flooding from ground water; and
- With regard to the objective of conserving and enhancing landscape character, the Council consider that *"the Site is within the Industrial foothills and Valleys Landscape Character Area (Zone 6a). The Site contains features which contributes towards this LCA. The Site features an extensive area of settlement edge agricultural land which rises gently at first from the edge of Barrowford. The Site features hedgerow and dry stone wall boundaries and separates Barrowford from rural farm steads located to the north west. The development of the LCA will have adverse effects on the LCA in the local area. The Site is greenfield, adjoining Barrowford to the west. Development of the Site would represent a significant extension to Barrowford, which fails to reflect the current settlement pattern and would result in an isolated field to the east. The land rises gently from Barrowford increasing in steepness to the west and is largely open. The Site would therefore be visible from the wider area to the west, but is of limited visibility from with Barrowford"*.

All of these factors demonstrate why the site represents a poor choice for future housing growth and reflect the concerns of the Parish with regard to its impact and suitability.

### 3.3 Pendle Local Plan Part 1: Core Strategy

- **Policy SDP1** outlines the Council's approach to sustainable development. The policy reflects the position of the Framework, insofar as the Council will seek to support new development unless the adverse impacts arising from the grant of planning permission would significantly and demonstrably outweigh its benefits;
- **Policy SDP2** sets out the Council's spatial development strategy and the hierarchy of settlements. Barrowford is defined as a 'Local Service Centre', a role which supports the larger 'Key Service Centres' and is intended to accommodate a scale of development which is to "serve a localised catchment". The policy also states that "where Greenfield land is required for new development, such sites should be in a sustainable location and well related to an existing settlement".
- **Policy ENV1** seeks to protect the Borough's natural and historic environments, including its biodiversity and landscape character. In areas not subject to national landscape designations (such as the application site) development should aim to safeguard or enhance the character of the area. Due consideration should be given to the Lancashire Landscape Assessment, with proposals demonstrating how they respond to the particular landscape character type they are located within;
- **Policy ENV2** seeks to deliver the highest possible standards of design, with schemes that are practical and legible, attractive to look at, and seek to inspire and excite. Proposals should contribute to the sense of place and make a positive contribution to the historic environment and local identity and character;
- **Policy ENV4** promotes sustainable modes of travel. Proposals for new development should have regard to the potential impacts they may cause to the highways network, particularly in terms of safety and the potential to restrict free flowing traffic, causing congestion. Where an adverse impact is identified, applicants should ensure adequate cost effective mitigation measures can be put in place. Where the residual cumulative impacts of the development are severe, planning permission should be refused;
- **Policy ENV7** requires new development to consider flooding and the risk the proposed development may pose to areas downslope/downstream;



- **Policy LIV1** relates to housing need and distribution, but was found to be out of date in the Core Strategy Review as it is based on an assessment of housing need which is no longer consistent with the Framework. It will, however, remain part of the development plan and be a material consideration until it is replaced in the Part 2 document. Aside from setting out housing targets, the policy also states that until Part 2 of the Plan is adopted, sites outside of but close to a settlement boundary will be considered for housing. Such proposals are expected to follow the spatial principles set out in Policy SDP2;

- **Policy LIV3** outlines the type of homes required in Pendle and required new development to have particular regard to the requirements of policies LIV4 and 5;

- **Policy LIV4** relates to the requirement for affordable housing within the Borough, but was found to be out of date in the Core Strategy Review due to certain definitions and thresholds. Need has also shifted since the CS was adopted, as evidenced in the 2020 Housing Needs Assessment;

- **Policy LIV5** seeks to deliver better places to live and to diversify the current housing stock in the Borough. Future housing schemes should deliver the following mix of property types to address need – 25% detached; 35% semi-detached; 10% terraced houses; 10% flats and 20% bungalows/elderly housing.

- **Policy SUP2** supports the delivery of new infrastructure which improves the health and wellbeing of residents.

- **Policy SUP3** advises that the Council will support the provision and improvement of new educational facilities where need exists.

### 3.4 Barrowford Neighbourhood Plan

The Barrowford Neighbourhood Plan was made in November 2019 and is part of the statutory development plan. As a result its policies should be given due weight in the determination of any planning application within the Plan area.

The following policies are relevant to this scheme:

- **Policy BNDP01** states that new housing developments will be considered where they align with the relevant policies of the Core Strategy (including ENV1 and LIV5); enhance the landscape setting of the Parish and are appropriate to the surrounding local context in terms of size, scale, design and character;

- **Policy BNDP08** seeks to protect important local views and vistas. Locally important views should be protected from development that is intrusive and detrimental to the landscape character. Any new development should not be of a scale, height and form which is discordant and disrupts the immediate surroundings and views.

### 3.5 National policies

The National Planning Policy Framework (2021) ('the Framework') sets out the Government's planning policies for England and how they should be applied. It requires local planning authorities to apply a presumption in favour of sustainable development which means, as paragraph 11c explains, that development which accords with an up to date development plan should be approved without delay.

Relevant paragraphs within the Framework include:

- **Paragraph 7** - The purpose of the planning system is to contribute to the achievement of sustainable development;
- **Paragraph 11** - The presumption in favour of sustainable development lies at the heart of the Framework. For decision-taking this means approving development where it accords with an up-to-date development plan, or where there are no relevant development plan policies or where the policies which are most important for determining the application are out-of-date, granting permission unless adverse impacts would significantly and demonstrably outweigh the benefits, or policies in the Framework indicate development should be restricted;
- **Paragraph 62** - The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent and people wishing to commission or build their own homes);
- **Paragraph 119** - Planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land;
- **Paragraph 124** - Development should make efficient use of land taking into account the need for different types of housing and other development and the availability of suitable land; market conditions and viability; availability and capacity of infrastructure; the scope to promote sustainable travel; the desirability to maintain the character and setting of an area or promote regeneration; and the importance of creating well-designed, attractive, healthy and safe places;
- **Paragraph 126** - The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- **Paragraph 130** – Development should function well and add to the overall quality of the area; be visually and architecturally attractive and be sympathetic to local character and history, including the surrounding built environment and landscape setting.

#### 4.0 Principle of development

Whilst Barrowford is identified as a 'Local Service Centre' in the spatial hierarchy as set out in Policy SDP2, it is the smallest settlement within the M65 corridor and is expected to play a supporting role to the larger towns of Nelson and Colne. Accordingly the level of development it is intended to accommodate should be proportionate to this role, taking into account its scale, infrastructure and landscape considerations.

Barrowford already accommodates the Borough's strategic housing site at Trough Laithe, which is expected to deliver in the region of 500 dwellings. To locate another scheme of over 250 dwellings to the north of the settlement would represent a degree of expansion which is disproportionate to the role of the settlement and would undermine the Council's spatial strategy.

It is noted that in the emerging Part 2 document, no new housing allocations are proposed within Barrowford, with the exception of a 'reserve site' for up to 60 dwellings off Wheatley Lane Road. It is intended that such sites will only be engaged should they be required to meet under-delivery or to address as yet unforeseen future need during the life of the Plan.

Whilst the Part 2 document is yet to be formally examined and will be subject to change, the recent Core Strategy Review confirms that:

*“The Local Plan Part 2 provides the opportunity to rebalance the amount of development delivered at the local level by identifying and allocating sites where there are residual housing and employment needs to be met taking into account completions and commitments. The basis of this distribution was previously consulted on by the Council in 2017 and is a sound assessment methodology.”*

The lack of any intended allocations within or at the edge of Barrowford is a clear indication that the level of development proposed in the application does not form part of the strategic rebalancing envisioned by the Council and would have numerous adverse impacts which will be considered later in this objection, including landscape and highway capacity concerns.

Accounting for the recent decisions of the Council with regard to the direction of the Part 2 document, it appears likely that the scope and amount of housing sites to be allocated within Pendle will be reduced to reflect the lower annual figure resolved at the Full Council meeting in December 2021. Accordingly, it is highly unlikely that Barrowford would be the target of significant growth as a result of any such review.

Policy LIV1 supports housing development which follows the spatial strategy laid out in Policy SDP2 and until Part 2 of the Plan is adopted, sites outside of but close to settlements will be considered. However, this approach is predicated on such sites being sustainable and appropriate in terms of their scale, nature and proximity to the relevant settlement.

In addition to the impact on the spatial role of Barrowford and housing distribution as a whole, the proposed scheme at Pasture Lane is not well related to the northern edge of the settlement and is not a natural infill site, resulting in a significant, anomalous projection into the open countryside.

Accordingly, the principle of development at this site presents conflicts with Policies SDP2, ENV1 and ENV2 of the Core Strategy; Policies BNDP01 and BNDP08 of the Neighbourhood Plan and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

Additionally there appears to be conflict with Policy LIV5, which outlines the balance of dwellings to be delivered in new development, by type. The development contains no bungalows or dwellings for older people, with LIV5 requiring at least 20% of new schemes to deliver such provision. There is a demonstrable national requirement for adaptable housing due to the ageing population of the country and as such any major development would be expected to assist in addressing this shortfall.



In light of all these factors, the principle of housing in this location is unacceptable and does not represent sustainable development.

## 5.0 Other material considerations

### 5.1 Design and Layout

The proposed layout offers little in terms of integration with Barrowford and the wider area and subsequently presents itself as an overly dominant sprawl into the open countryside.

The Framework is clear in that design is a key component of sustainable development and seeks to create *'beautiful places'* (para 126). Whilst landscape impact will be considered in more detail below, the proposed high density layout represents poor design, with little or no consideration having been given to its interface with the surrounding countryside, creating a hard edge to the site.

The proposed design is formulaic as a result and does little to reflect its surroundings. The elevated nature of land also means that it falls within key views and vistas as detailed within the Barrowford Neighbourhood Plan Policy BNDP 8 vista 17 (see figure 10 page 52), and would appear as a discordant landscape feature from these vantage points.

Pasture Lane frontage will be the main entrance into the site. This proposed stretch of new frontage will completely erode away the established and distinctive natural hedgerow which runs the full length of Pasture Lane.

There are a total of 12 individual house types across the site, all suburban in style and there is no reference to the chosen design or evidence that any reference has been made to the surrounding types of housing.



Plan extract: showing the proposed front elevation along Pasture Lane

### 5.2 Highways

Barrowford Parish Council have major concerns over the creation of the new access onto Pasture Lane. It must be noted that highways was a main concern during the assessment of the 2018 pre-application;

*'The main concern here is access and the capacity of the highway network into Barrowford and how this can be achieved in terms of existing infrastructure.'* (Source: Council pre-app response)

The proposed access to the site is located on Pasture Lane, a narrow “B” road which is one of the main routes to Roughlee and the Pendleside villages of Barley and Newchurch beyond. The proposed entrance is located on a steep incline. There would appear to be a proposed extension of the footpath along the southern side of Pasture Lane close to the 90 degree left hand turn. This section of road, for traffic going to Roughlee or returning to Barrowford, is highly constrained, adding to existing constraints on the road and the wider local network.

Specific Concerns are as follows:

- Sight lines at the entrance to the proposed development in relation to the current National Speed Limit on that section of road
- Lack of pavements to either side of the carriageway in the immediate vicinity of the development entrance
- The potential for Kendal Avenue to be used as a rat run through Appleby Drive and Lupton Drive to Church Street during peak times
- Restrictive width of Pasture Lane and above the junction with Gisburn Road, giving very poor sight lines at the bend above Booths supermarket
- Egress onto Gisburn Road during peak periods through poor sight lines and the close proximity of the roundabout at the bottom of Halstead Lane

A much smaller development of 1.2Ha at Albert Mills with a proposed access from Factory Lane was refused and the decision upheld on Appeal through highway infrastructure concerns.

A subsequent application accessing off Mint Avenue onto Lupton Drive and Church Street was refused and again the appeal decision on highways grounds (application 96/0519) In the intervening years no significant improvements to the local highway infrastructure have been carried out that would support a 257 house residential site at this location.

Gisburn Road

- The additional traffic generated from a further 257 houses would considerably add to the congestion at peak times.
- Existing congestion would lead to the use of Kendal Avenue as a rat run to either Newbridge via Church Street, Highercauseway and Nora Street or to Carr Hall via Wheatley Lane and Carr Hall Road.

**Parking**

Policy 31 (Parking) of the Replacement Pendle Local Plan (RPLP) requires that new developments provide parking in line with the levels set out in Appendix RPLP.

The supporting statement states that;

*Parking for all 257 no. properties is provided off-road, to the front or side of the properties on private driveways and garages. Each of the properties will be assigned two parking spaces. The level of parking accords with the parking standards set out via Policy 31 of the Replacement Local Plan.*

There are a total of 74 units which will be 4 bedroom which would require 3 car parking spaces. This does not appear to have been addressed in the proposed

layouts and neither Pendle Council or LCC will not want to see a high level of on street parking on the proposed new roads.

### 5.3 Trees and Ecology

The NPPF seeks to incorporate measures to conserve and enhance the natural and local environment, including 'Biodiversity and Geological Conservation'. Paragraph 179 of the NPPF requires that in determining planning applications significant harm resulting from a development should be avoided, adequately mitigated, or, as a last resort compensated for; and opportunities to incorporate biodiversity in and around developments should be encouraged.

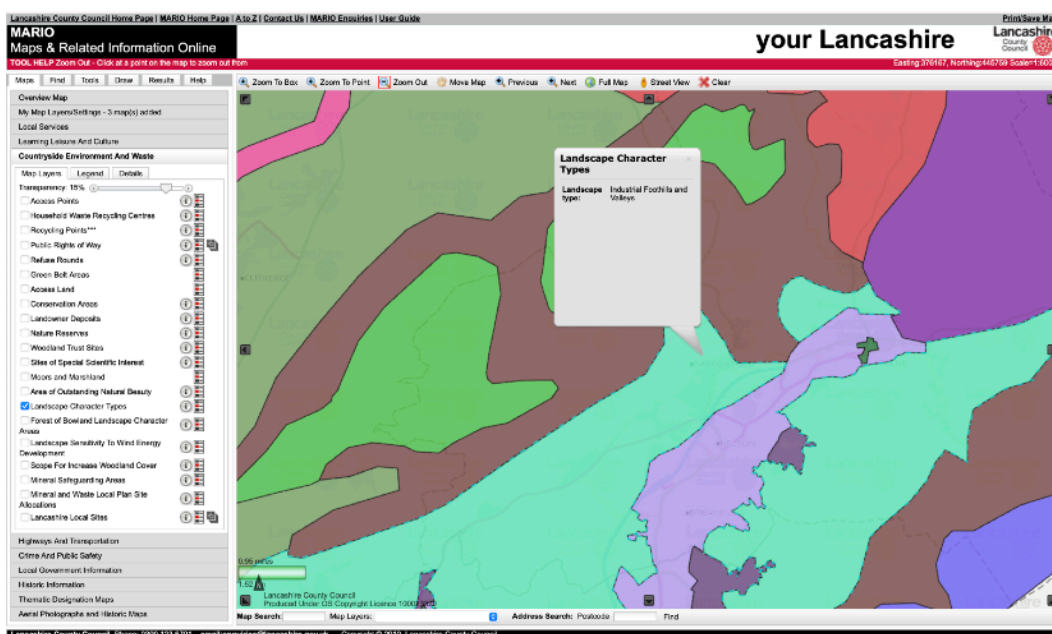
The application has been supported by an Ecological Appraisal but on a site of this scale a Biodiversity Net Gain Assessment should have been provided by the applicant.

Whilst not mandatory at present, Natural England have formulated DEFRA Biometric Calculator 3.0 which is a method of measuring quantitative losses and gains that result from a development and land use changes. This is considered to be a major gap in the application submission. The absence of a Biodiversity Net Gain Assessment does not allow a full assessment of the application and its impacts on the environment.

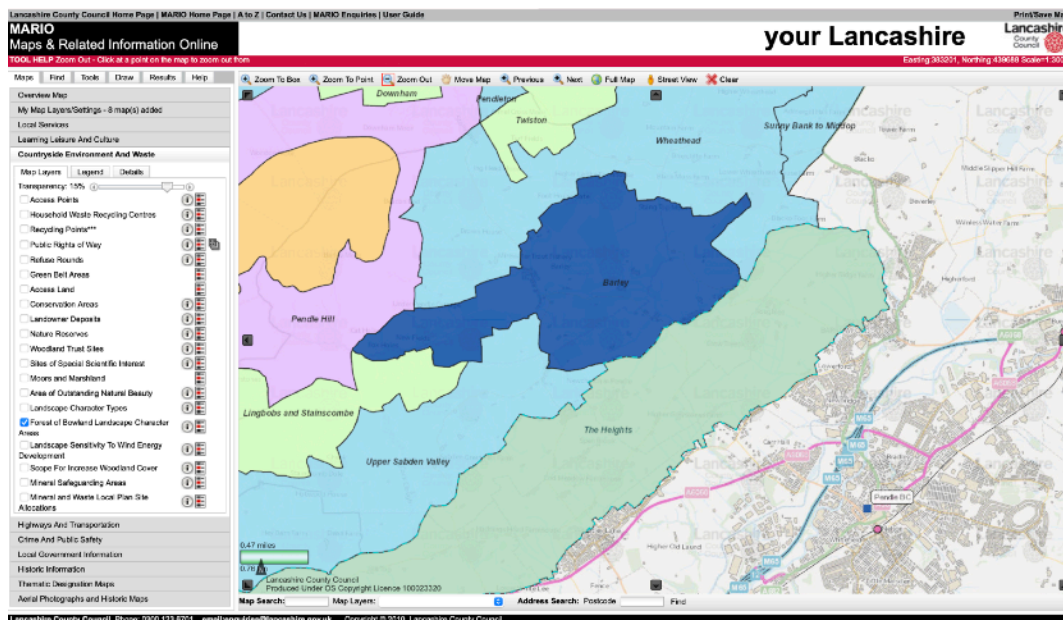
### 5.4 Landscape Impact

Whilst the application has been supported by a Landscape Impact Assessment, it fails to detail the most basic landscape character types which are publicly available through LCC's Mario map website.

In the Lancashire Landscape Character Types the site is defined as 'Industrial Foothills and Valleys', refer to extract plan below. Detail of this Character type was also referenced by the Council in the site allocations site selection and assessment.



Whilst not officially located within the AONB, the site is located within the Forest of Bowland Landscape Character Area, designated as 'The Heights', farmed ridges. The following map extract details this.



Most relevant to the site is the following description

*'From the top of the ridge, open, panoramic views southwards across the urban areas of Padiham and Barrowford contribute to a recognisable sense of place'*

In its Guidance for future management the assessment states;

*1.1.13 The overall strategy for the Farmed Ridges Landscape Character Type should be to conserve the distinctive mosaic of mixed farmland and woodland, the intricate pattern of stone walls that delineate field boundaries and the long, open views across surrounding lowlands from the ridge top settlements and roads. There is also a need to appropriately enhance hedgerows and repair stone walls where these are in decline, and to conserve the smooth, uncluttered skyline of the ridges.*

The site is on an elevated position where there is a clear change in landscape character from the settlement boundary of Barrowford to the open fields and farmland only a short distance from the Forest of Bowland AONB. Both sides of Pasture Lane have a very open nature aside from characteristic sections of dry stone wall, hedging and a scattering of trees. The land has a gradual west-east fall, with a more distinct fall to the housing on Appleby Drive and Wheatley Lane.

While the application site may not be located in a 'valued' landscape in the context of the NPPF (paragraph 174a) the site does have two Public Rights of Way running through it and is most certainly valued by the community of Barrowford as can be evidenced from the amount of public interest in it. The site lies in the countryside which is valued by the Parish and wider

community and where its intrinsic character and beauty should be recognised in accordance with Paragraph 174 (b) of the NPPF.

Development on the scale of this application would therefore compromise the landscape's rural character and in turn would have a detrimental impact on the landscape views within, across and outside the site.

The development would be an urbanising feature, eroding the visual qualities of the current open fields which make a positive and valued part of the rural landscape.

## 5.5 Other considerations

### 5.6 Social Infrastructure

It is noted that the East Lancashire NHS Trust have requested section 106 monies for the contribution to increase demand for health care services. At the time of this report comments from LCC schools have not been submitted to the Council.

#### Schools

When a detailed planning application for the 1st phase of the Trough Laithe Strategic Housing Site development was submitted, Lancashire County Council's Education assessment showed a lack of places at primary level within 2 km of that site, and a Section condition for the developer to contribute to school places provision was applied. This site is further away from primary school provision within Nelson and Colne from Trough Laithe, which will exclude some of the schools in those towns due to distance. Although it is nearer to Barrowford's Schools, the LCC assessment for Trough Laithe identified a lack of local capacity and this situation will only deteriorate when planning for phase 2 of Trough Laithe is approved and the houses built. The additional number of children generated from building 257 new houses over and above the 2nd phase of Trough Laithe would necessitate the extension of one or both Barrowford schools to create the necessary additional capacity. However, this would not be feasible at the late Victorian era Barrowford Primary School due to lack of land availability for both additional classrooms and increased playgrounds.

#### Doctor's Surgeries

There are two doctor's surgeries within Barrowford which have either full patient lists or limited availability.

#### Dentist's

There is currently one practice with no availability.

### 5.7 Lack of renewable energy on site

There is an absence of any renewable energy considerations in accordance with Policy ENV 3 - Renewable and Low Carbon Energy Generation.

### 5.8 Lack of affordable housing

There is no provision of affordable on site homes in line with Policy LIV 4

### 5.9 Drainage

The NPPF provides policy guidance relating to flood risk. Paragraph 163 states that local planning authorities, when determining planning applications, should ensure flood risk is not increased elsewhere.



As well as sloping down Pasture Lane the land also slopes southward towards Clough Springs on Wheatley Lane Road. Surface water from the site drains predominantly to that area, which already suffers from severe water run-off problems, partially from rainfall and partially from natural springs along the hillside. This surface water already causes significant problems on Wheatley Lane to the sides of St Thomas Close and Clough Springs as well as to the public footpath leading from the site. Mr G. Asprey, one of Pendle Council's drainage officers, is well aware of the flooding problems there.

The Parish Council can provide photographic evidence making clear grounds for major concern regarding water run-off in this area, especially onto Wheatley Lane Road.

## 6.0 Conclusions

The principle of development at this site presents conflicts with Policies SDP2, ENV1 and ENV2 of the Core Strategy; Policies BNDP01 and BNDP08 of the Neighbourhood Plan and the requirements of the Framework to create high quality, beautiful places which make effective use of land whilst safeguarding and improving the environment.

In summary the application should be refused for the following reasons;

1. Development of this scale would compromise the rural character and have a detrimental impact on landscape views within and out of the area contrary to policy ENV1 and Barrowford Neighbourhood Plan policy BNDP 08
2. The development would create an urbanising feature which would erode the visual qualities of the historic field patterns contrary to policy ENV1
3. Impact on the two PROWs which have not been fully considered or described as part of the application, contrary to policy ENV1
4. Inappropriate suburban housing with no consideration of the surrounding context contrary to ENV2
5. No integration with the surrounding area, creating a separate urban extension into a green field site contrary to policy ENV1
6. Increasing pressure on the social infrastructure, which is already at capacity, including health schools and roads, contrary to Policy ENV 7
7. Detrimental impact on existing drainage systems placing increasing pressure on known drainage 'hot spot' areas contrary to policy ENV7
8. No proper consideration of the Biodiversity New Gain which the site should be bringing forward, contrary to policy EN2
9. A lack of any form of renewable energy considerations and designing for climate change contrary to policy ENV2
10. Unbalanced mixture of housing type, not fulfilling requirements set out in policy LIV3