

<b>Application Number:</b>	2021/0457	<b>Application Type:</b>	Full
<b>Proposal:</b>	Full: change of use of land to a car park, with associated works and landscaping.	<b>Location:</b>	Land adjacent to Car Park, Fern Street, Bacup Lancashire OL13 8AB
<b>Report of:</b>	Planning Manager	<b>Status:</b>	For Publication
<b>Report to:</b>	Development Control Committee	<b>Date:</b>	12/10/2021
<b>Applicant:</b>	Mr Freddy Khattab	<b>Determination Expiry Date:</b>	15/10/2021
<b>Agent:</b>	N/A		

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<b>REASON FOR REPORTING</b>	
<b>Outside Officer Scheme of Delegation</b>	✓ (RBC-owned Land)
<b>Member Call-In</b> Name of Member: Reason for Call-In:	
<b>3 or more objections received</b>	✓
<b>Other (please state):</b>	

## HUMAN RIGHTS

The relevant provisions of the Human Rights Act 1998 and the European Convention on Human Rights have been taken into account in the preparation of this report, particularly the implications arising from the following rights:

### Article 8

The right to respect for private and family life, home and correspondence.

### Article 1 of Protocol 1

The right of peaceful enjoyment of possessions and protection of property.

## 1. RECOMMENDATION

Refusal.

## 2. SITE

The site in question lies immediately to the west of the existing Council-owned car park on Fern Street, Bacup. The land in question is also owned by Rossendale Borough Council, and currently comprises an area of open space with a public bench, small paved area and a waste bin, all accessed off Dale Street.

The Dale Street (western) side is flat, but then slopes quite steeply down to the east where it comprises a grassed embankment.

The site is in proximity to St John's Church, a Grade II listed building. The site is within the Bacup Town Centre Conservation Area which is covered by an Article 4 Direction.

The site is shown in the photograph below (taken in August 2021):



## 3. RELEVANT PLANNING HISTORY (relating to St. John's Church also)

2014/0560 - Listed Building Consent for works required as part of a proposed change of use from church (D1) to dwellinghouse (C3) including: creation of a new first floor under the aisles and over the existing altar area, a high level mezzanine, basement conversion, and installation of rooflights and solar slates. (Approved)

2014/0559 - Change of use from church (Use Class D1) to dwellinghouse (Use Class C3) including installation of rooflights and solar slates, erection of detached garage and alterations to existing gated access to the churchyard. (Approved)

2016/0003 - Removal of bell from the tower and relocation at Christ Church, Staincliffe, West Yorkshire, prior to the building's conversion to residential use. (Refused)

2016/0430 - Discharge of Conditions 3 (Archaeological Recordings) Condition 4 (Schedule of Repair) Condition 5 (Glazing Report) pursuant to Listed Building Consent 2014/0560. (Split Decision)

2016/0431 - Discharge of Conditions 6 (Storage of Bins) Condition 10 (Fences to be erected) and Condition 11 (Archaeological Recording) & Condition 13 (Gate for the Car Park) pursuant to Planning Approval 2014/0559. (Split Decision)

2020/0458 - Full (part retrospective): Change of use of the main building from a dwelling house to a mixed use of sui generis and residential use to enable events such as a farmers' market, a gallery and music concerts, with an element of residential accommodation retained. Incorporates associated internal and external alterations to the building, plus landscaping and retaining works. Also the construction of an external WC block, and the construction of a new stand-alone one-bedroom apartment for use as a holiday let. (Pending)

2020/0459 - Listed Building Consent: internal and external works associated with change of use of building from a dwelling house to a mixed use of sui generis and residential use, also incorporating landscaping and retaining works and the construction of an external WC block, and the construction of a new stand-alone one-bedroom apartment for use as a holiday let. (Pending)

#### Planning Enforcement

The Council served a temporary stop notice (section 171E of the Town and Country Planning Act 1990) on St John's Church on Monday 20 September 2021. It required all events / activities that have been taking place without the benefit of planning permission, to stop until such time that planning permission is granted. The Farmers' Market took place on Sunday 26 September and therefore the Council will now proceed to prosecution.

#### **4. PROPOSAL**

The owner of St. John's Church seeks planning permission for the creation of an area of car parking on the land. The application has resulted from concerns raised by LCC Highways on related application 2020/0458 (currently pending) relating to a lack of parking provision for the proposed use of St. John's Church as an events venue (as proposed under 2020/0458).

By creating an additional area of car parking on the application site, the applicant intends to address the concerns of LCC Highways towards application 2020/0458. Whilst the applicant does not own the area of land in question now proposed for car parking, it is understood that they intend to apply to the Council to purchase the land (to implement the car parking scheme) if the current planning application is approved.

The proposed scheme would entail removal of the existing area of informal open space on the site, the removal of the built-up earth on the site to make its profile match that of Fern Street, and the creation of ten car parking spaces on the land.

The site would be surfaced in tarmac, and at each end of the site Holly hedging would be planted (at a height of around 50cm). Access to the spaces would be directly off Fern Street and Goose Hill Street.

An amended plan has been received (further to advice received from LCC Highways requesting that the originally proposed spaces be widened to 3m and the originally proposed motorcycle spaces be omitted), showing that there would be 10no. car parking spaces each measuring 3m wide by 4.8m long.

The land is currently owned by Rossendale Borough Council, and it is understood that the applicant wishes to purchase the land if this planning application is successful.

## 5. **POLICY CONTEXT**

### **National**

#### **National Planning Policy Framework**

Section 2	Achieving Sustainable Development
Section 4	Decision Making
Section 5	Delivering a sufficient supply of homes
Section 6	Building a Strong, Competitive Economy
Section 7	Ensuring the vitality of town centres
Section 8	Promoting Healthy and Safe Communities
Section 9	Promoting Sustainable Transport
Section 11	Making Effective Use of Land
Section 12	Achieving Well Designed Places
Section 14	Meeting the Challenges of Climate Change, Flooding, etc
Section 15	Conserving and Enhancing the Natural Environment
Section 16	Conserving and Enhancing the Historic Environment

### **Development Plan Policies**

#### **Rossendale Core Strategy DPD**

AVP 2	Bacup, Stacksteads, Britannia and Weir
Policy 1	General Development Locations and Principles
Policy 2	Meeting Rossendale's Housing Requirement
Policy 3	Distribution of Additional Housing
Policy 7	Social Infrastructure
Policy 8	Transport
Policy 9	Accessibility
Policy 11	Retail & Other Town Centre Uses
Policy 14	Tourism
Policy 15	Overnight Visitor Accommodation
Policy 16	Preserving and Enhancing Rossendale's Built Environment
Policy 18	Biodiversity, Geodiversity and Landscape Conservation
Policy 19	Climate Change and Low & Zero Carbon Sources of Energy
Policy 23	Promoting High Quality Design & Spaces
Policy 24	Planning Application Requirements

## 6. **CONSULTATION RESPONSES**

<b>Consultee</b>	<b>Summary of Comments received</b>
Cadent	No comments received
LCC Highways	No objection subject to conditions
Conservation Consultant	Advice provided
RBC Property Services	No objection, provided comments for information

## 7. NOTIFICATION RESPONSES

To accord with the General Development Procedure Order a site notice was posted and 32 letters were sent to neighbours. A press notice was also published.

24 letters of objection have been received, raising the following points in summary:

- Loss of an important piece of public open space
- Harm to visual amenity / street scene
- Harm to public amenity
- Will encourage anti-social behaviour
- Highway safety issues / poor visibility
- Many residents have no garden and rely on this space for outdoor recreation
- There is enough car parking for the church already, it is abandoned vehicles blocking parking spaces that is the problem
- No benefit to local residents
- The land / bench currently encourages local people to socialise and reduces stress
- The land is a community asset
- Children use the land to play
- Harm to local heritage
- Land is well-used by local residents
- Proposal will cause unacceptable levels of traffic
- The use of the land to support St. Johns will not benefit residents in the local vicinity, but will cause them harm
- The local community is very close-knit and depends on the space to meet and for recreation
- There is a huge amount of car parking provision already in the Bacup area, and this is unnecessary
- Increased flood risk from water run-off from the proposed tarmac
- Could compromise the stability of Dale Street
- The only reason that the site has not been used as much over the past year has been Covid-19 – previously it was very well used and will be well used again now
- A community asset should not be lost to benefit a single private individual

## 8. ASSESSMENT

The main considerations of the application are:

- 1) Principle
- 2) Loss of Public Open Space
- 3) Social Infrastructure and Tourism
- 4) Visual Amenity / Heritage Impact
- 5) Residential / Public Amenity
- 6) Access, Parking and Highway Safety
- 7) Neighbour Representations
- 8) Material Considerations and Planning Balance

### Principle

The application proposes the loss of open space, and replacement with a car park. The application site is located within the defined urban boundary, where Policy 1 of the Core Strategy seeks to locate the majority of new development. Therefore, ordinarily the principle of a car park on land in the urban boundary would be acceptable.

## Loss of Public Open Space

As the application involves the loss of open space, it must be considered against Section 8 of the NPPF, which defines open spaces as:

*“All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.”*

Officers consider that the site falls within this definition, comprising informal urban amenity space. The representations from local residents would agree with this conclusion.

The application must then be assessed against paragraph 99 of the NPPF, which states:

*“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

Having regard to the above, it has not been demonstrated by the applicant that the open space in question is surplus to requirements. Indeed, many of the representations from members of the public assert that the space is well used and is not surplus to requirements. The proposed development does not comply with points b) and c) in that no replacement open space is proposed, and the development is not for alternative recreational provision.

As such, it is considered that the development is not compliant with paragraph 99 of the Framework.

Similarly, Core Strategy Policy 7 states that *“the loss of social infrastructure / cultural facilities such as pubs, post offices, theatres, community halls, youth centres, parks and open space that require a change of use application will be resisted, particularly in local centres and small settlements”*. The policy states also that the significance of the loss on the local community will be considered when assessing applications.

Again, as the application proposes the loss of open space (a space which a significant number of local residents have stated is well used and important to the local community), and no replacement open space is proposed, the development would not comply with this aspect of Policy 7 of the Core Strategy.

The above assessment has dealt with the loss *per se* of a piece of open space (i.e. the principle of the loss of open space). Specific assessment of the actual impact of that loss on public / residential amenity will be dealt with in a later section of this report.

## Social Infrastructure and Tourism

Again having regard to Policy 7 of the Core Strategy, whilst the proposed scheme would not in itself provide a new piece of social infrastructure, it is intended to facilitate the creation of an events venue (under application 2020/0458) which would serve as an enhancement to the existing social infrastructure in the local area.

Policy 7 of the Core Strategy is supportive of the creation of new social infrastructure, such as community events facilities. The policy states that *“a positive approach will be taken to the development of new and enhanced social infrastructure, especially where this creates options for a variety of uses and user groups and reduces the need to travel”*.

It is considered that the proposed scheme (by virtue of supporting application 2020/0458) accords broadly with one of the aims of Policy 7 (but not all of that policy as outlined in the section of the report above), by assisting in locating a new community events space in an accessible location within Bacup Town Centre, providing that any planning permission for the car park is linked to any planning permission for the change of use of the church.

Policy 11 of the Core Strategy states that *“retail development, together with other town centre uses, including offices, leisure, arts, culture and tourist facilities, will be focused within the defined town and local centres.”*

Again, by virtue of the site’s location within Bacup Town Centre and the facilitation of a proposed a leisure / arts / cultural facility, the scheme would broadly accord with the aims of Policy 11.

The scheme proposed under 2020/0458, which the current application would support, also accords broadly with the aims of Policy 14 (tourism), which states that:

*“Tourism growth will capitalise on leisure pursuits and the unique sense of place within the Valley, including its heritage assets, giving particular emphasis to the east of the Borough.*

*Tourism throughout the Borough will be promoted by:*

- *Events promotion*
- *Taking a positive approach to development of complementary accommodation and hospitality facilities.”*

Having regard to the above whilst not providing such facilities itself, the application would assist in supporting a tourism-related development which would also facilitate the creation of a new piece of social infrastructure in a town centre location.

## Visual Amenity / Heritage Impact

Policy 23 of the Core Strategy seeks to ensure that all new developments *“are of the highest standard of design that respects and responds to local context, distinctiveness and character”*.

Policy 23 of the Core Strategy seeks to ensure any new development is *“compatible with its surroundings in terms of style, siting, layout, orientation, visual impact, local context and views, scale, massing, height, density, materials and detailing”*.

Policy 16 of the Core Strategy seeks to protect, conserve, preserve and enhance Rossendale's historic built environment including Listed Buildings. The policy contains support for *“maximising the potential for the re-use of buildings of historic or local interest for appropriate uses to ensure their future longevity”*.

The Council's conservation consultant has provided comments on the application, and has identified that the proposal will cause a degree of 'less than substantial' harm to the street scene, the wider Conservation Area and the setting in which the adjacent Listed Building is viewed. As per the requirement under paragraph 202 of the Framework, where less than substantial harm to a designated heritage asset it is necessary to weigh the harm against the public benefits of the proposal including, where appropriate, securing its (the heritage asset's) optimum viable use.

To provide context and guidance to officers in making such an assessment, the conservation consultant has stated the following:

*“The Church is a prominent building experienced within the surrounding area. Its principal elevation is seen when travelling north and south along Burnley Road. Whilst the site has no intrinsic historic association with the Church the site forms part of the church's immediate setting and its elevated position allows for uninterrupted views of its built form and massing, and thus enhances the ability to appreciate its significance.*

*To some extent the green space of the churchyard (which includes the site of the War Memorial which fronts onto Burnley Road) links with the green space of the site and provides a natural 'foil' or contrast to the tight knit urban grain of the surroundings. In this respect I note that St Johns Church grounds is identified as important a green space on the character appraisal's Trees, Open Spaces or Views.*

*In this regard whilst I assign limited value to the existing 'pocket park' site and feel it doesn't directly contribute to either the significance of the Church or War Memorial, I nevertheless feel that it makes a positive contribution to the wider setting and to the general appearance of the Conservation Area.*

*I am however mindful that whilst the change of use of the space will change the environment in which the Church is viewed the works themselves will not limit or reduce the ability to view the Church.*

*In this context I feel the proposed change of use to car parking would impact to some degree on the visual amenities of the street scene and the loss of the green space would result in some loss of cohesion and interconnectivity between the green spaces of the Church, War Memorial and the current site. The creation of additional hard standing/surfacing in this context should be seen as causing some harm to the Conservation Area.*

*On this basis I feel the works would cause less than substantial harm to the character and appearance of Bacup Conservation Area and a negligible level of harm to the contribution made by the setting to the significance of St John's Church and the adjacent Listed War Memorial. I would regard the harm/impact to fall at the low end of the 'less than substantial' scale.*

*P.202 of the NPPF states that less than substantial harm should be weighed against the public benefits of the proposal. It is for the LPA to consider the wider public benefits of the proposal against the level of harm in its planning balance, remembering that great weight*



*should always be given to any identified harm to a heritage asset. More information on public benefits is included in the Planning Practice Guidance and can be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8).*

*In this instance I am mindful that the proposed car park is required to support the proposed new mixed events/leisure use at St John's Church, which is subject to a separate planning application (2020/0458). The LPA should consider whether the new car parking is essential to deliver the public benefits to be generated from that scheme and be satisfied that the harm (albeit limited) caused by this scheme can be adequately justified and therefore meet the requirements of NPPF P.200.*

*I would suggest, given the direct link, that development of the car park in isolation would be inappropriate and that any permission needs to be tied to the delivery of the 'benefit' which in this case is the COU of the former Church."*

Having regard to the above, it must be concluded that the proposed scheme will cause harm to the character and appearance of the street scene and the wider Conservation Area, as well as causing some harm to the setting of nearby designated heritage assets.

The conservation consultant has identified that the level of this harm is low – stating *"I would regard the harm/impact to fall at the low end of the 'less than substantial' scale"*.

Regardless of the fact that the magnitude of the identified harm is considered to be low however, paragraph 199 of the Framework states that:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."*

Accordingly, great weight will need to be afforded to this harm in the planning balance, where the public benefits of the scheme will be duly weighed against the harm caused.

When the planning balance is undertaken, the comments of the conservation consultant must be borne in mind, in relation to whether this proposed scheme is *essential* to deliver the public benefits of the related scheme for the conversion / change of use of St. John's Church.

### Residential / Public Amenity

Core Strategy Policy 24 requires new developments to be designed to protect the amenity of the area.

The scheme would result in the loss (without replacement) of a piece of informal public open space, which currently includes a bench for members of the public to use (with a relatively open outlook), with landscaping / planting on its east side. As such, the scheme would cause harm to the amenity of the area to which weight must be afforded in the planning balance.

In terms of assessing the amount of harm (and therefore the weight to be afforded to this harm), consideration must be given to:

- The significance of the loss of the public open space to the local community.
- The availability of other similar areas of public open space in the site's vicinity.

In terms of the significance of the loss, the scheme would result in the loss of a single public bench, located close to surrounding residential properties (many of which have only very limited private outdoor amenity space / gardens of their own). The bench could currently accommodate two or three people at any given time. There is space on the site for limited play by children and for several members of the public to meet.

In terms of the availability of other similar areas of public open space nearby, there is a larger area of open space located around 35m to the south on Dale Street. The area of open space in question is shown below:



This area is a larger paved space with two public benches and a waste bin, surrounded by black iron railings and a gate, with overgrown landscaping / planting on its eastern side. The benches in this area could accommodate between four and six people at any given time, and there is space for limited play by children and for several members of the public to meet. The outlook of the space on Dale Street is more enclosed than that of the application site.

Having regard to the above, despite the availability of alternative public open space in close proximity to the site (on Dale Street), officers consider that moderate harm would result from the loss of the public open space in question on Fern Street – as it currently provides the opportunity for local residents to sit outside and meet, and for children to play, in pleasant, open surroundings and has moderate value to the amenity of the local area.

Having regard to the above, it is considered that the development does not accord with the requirements of Policy 24 of the Core Strategy in that it would not protect the amenity of the local area. Weight must be afforded to the harm identified above in the planning balance.

## Access, Parking and Highway Safety

The Local Highway Authority is currently objecting to the related planning application for the change of use of St. John's Church to an events venue (ref: 2020/0458) on the grounds that there is insufficient vehicular parking to support that proposal. As such, the applicant has made this current planning application to create a new area of car parking in an attempt to satisfy the concerns of the Local Highway Authority over application 2020/0458. Application 2020/0458 is still a live application, on hold pending the outcome of this application which supports it.

Whilst the current proposal is one way in which the current Highways objection to 2020/0458 may potentially be overcome, it has not been demonstrated that this is the *only* way. Indeed, no documents have been submitted which explore other possibilities such as limiting the capacity of the proposed events venue to reduce parking demand, or the potential for the use of other parking facilities elsewhere in the town centre. In relation to considering therefore whether the current scheme is *essential* to delivering the potential public benefits of the related conversion of St. John's Church (2020/0458) it has not been demonstrated that this is the case.

In relation to the current application, the Local Highway Authority has raised no objection to the proposed new area of car parking now that an amended plan has been received showing that the car parking spaces will be widened to measure 3m x 4.8m. This reconfiguration has necessitated the omission of the originally proposed motorcycle spaces – and the Local Highway Authority has confirmed that this is acceptable and that the motorcycle spaces were surplus to requirements in any case.

The Local Highway Authority has requested a condition requiring that the above measurements are adhered to on site for the parking spaces to ensure adequate space for cars to safely manoeuvre. Other conditions are recommended by the Local Highway Authority relating to drainage and surfacing of the parking area.

Having regard to the above and subject to the proposed conditions, the scheme is considered acceptable in terms of access, parking and highway safety.

### Neighbour representations

As set out earlier in the report, a total of 24 objections to the proposals have been received – a summary of the key issues raised is provided earlier in the report.

Many of the issues raised relate to areas of national and local planning policy already addressed in the sections of the report above. It is considered that several salient points are raised particularly in relation to the loss (without replacement) of a piece of public open space, and in relation to the visual and heritage impact of the proposed development. The application has not demonstrated that harm caused in relation to such issues will be overcome, and accordingly weight will be afforded to such harm in the planning balance.

Other matters raised in relation to concerns over highway safety and drainage have been considered, but owing to the lack of an objection from the Local Highway Authority and the ability for planning conditions to be included on any approval, it is considered that such matters can adequately be controlled by the Local Planning Authority through the use of conditions.

## Material Considerations and Planning Balance

Planning applications must be determined in accordance with the provisions of the Development Plan, unless other material planning considerations indicate otherwise.

In this case, there is conflict with the development plan (Policies 7, 16 and 24 of the Core Strategy) and conflict with the NPPF (Sections 8 and 16).

However, the fact that this application supports the delivery of the related scheme proposed under application 2020/0458 for the creation of an events venue in the adjacent Church of St. John the Evangelist is a material planning consideration which must be given due consideration when determining the current application. Accordingly, it is necessary in this case to carry out a balancing exercise to weigh the potential benefits of the scheme against the potential harm.

There is also an additional requirement to carry out a balancing exercise under paragraph 202 of the Framework in this case, as there is identified harm to a designated heritage asset which must be afforded great weight, and balanced against the public benefits of the proposals.

In terms of the public benefits of the scheme, the proposal would potentially facilitate the creation of an events venue which could in principle provide a new piece of social infrastructure in the local area, with associated tourism benefits for the borough and benefits for the local community. The scheme proposed under 2020/0458 is intended to host local farmers' markets, music concerts and other events. Given that the proposed car park directly supports this scheme (but that it has not been demonstrated that this is the only solution to the parking issues with 2020/0458 and therefore the current scheme cannot be considered completely *essential* to the delivery of that scheme) this represents a moderate public benefit.

A further public benefit of the scheme is that in supporting the associated development at St. John's Church, the development would assist in securing the optimum viable use of that heritage asset – assisting in securing its long-term conservation. This represents a limited benefit (having regard to the fact that planning permission is already in place for St. John's Church to be used as a dwelling, which would also secure its long-term use and hopefully conservation).

It is recognised that in order to secure the delivery of the above benefits, any planning permission would need to be tied by planning condition (or legal agreement) to the delivery of the associated development at St. John's Church to ensure that the benefits are realised.

In terms of harm, despite the availability of alternative public open space in close proximity to the site, officers consider that moderate harm to public enjoyment / amenity would result from the loss of the public open space in question on Fern Street – as it currently provides the opportunity for local residents to sit outside in pleasant, open surroundings and has moderate value to the amenity of the local area. It is not however the only piece of available public open space in the vicinity. As such, moderate weight is afforded to this harm.

Further visual harm would be caused to the street scene through the loss of an open green space, and the introduction of hard standing in its place. Moderate weight is afforded to this visual harm to the street scene.

In terms of heritage impact, the Council's conservation consultant has identified that a low level of harm would also be caused to the character and appearance of the Conservation Area and to the setting of the adjacent Listed Building and war memorial. However, paragraph 199 states that great weight should be afforded to the conservation of designated heritage assets – including where the level of harm identified to its significance is less than substantial (as is the case here). Accordingly, great weight is afforded to the identified harm which would be caused to the setting of the adjacent listed building - St. John's Church.

It is considered that all other material planning considerations have a neutral impact on the planning balance.

Similarly, the Local Highway Authority has raised no objection (subject to the inclusion of conditions) and as such the highway safety implications of the proposal are considered to be neutral.

In conclusion, it is considered that the level of harm (moderate weight to harm to public amenity, moderate weight to harm to visual amenity and great weight to harm to the setting of a listed building) which would be caused by the proposed scheme would outweigh the public benefits (moderate weight to supporting the creation of new social infrastructure, and limited weight to supporting the conservation of St. John's Church).

As such, officers do not consider that material planning considerations justify a departure from Development Plan policy (i.e. the requirements of Policies 7, 16, 23 and 24 of the Core Strategy DPD) and consider that the development would not accord with the National Planning Policy Framework. As such, planning permission should be refused.

## **9. REASON FOR REFUSAL**

The development would result in the loss of a piece of public open space without adequate justification, and would result in harm to the setting of a designated heritage asset (St. John's Church). Furthermore, the development would result in harm to public amenity and visual amenity. It is not considered that the public benefits of the scheme would outweigh the identified harm. As such, the development would be contrary to Policies 7, 16, 23 and 24 of the Core Strategy DPD and Sections 8 and 16 of the National Planning Policy Framework.

## **10. INFORMATIVES**

1. Standard refusal informative.