

DARTMOOR NATIONAL PARK AUTHORITY  
DEVELOPMENT MANAGEMENT COMMITTEE

04 September 2020

**APPLICATIONS FOR DETERMINATION BY THE COMMITTEE**

Report of the Head of Development Management

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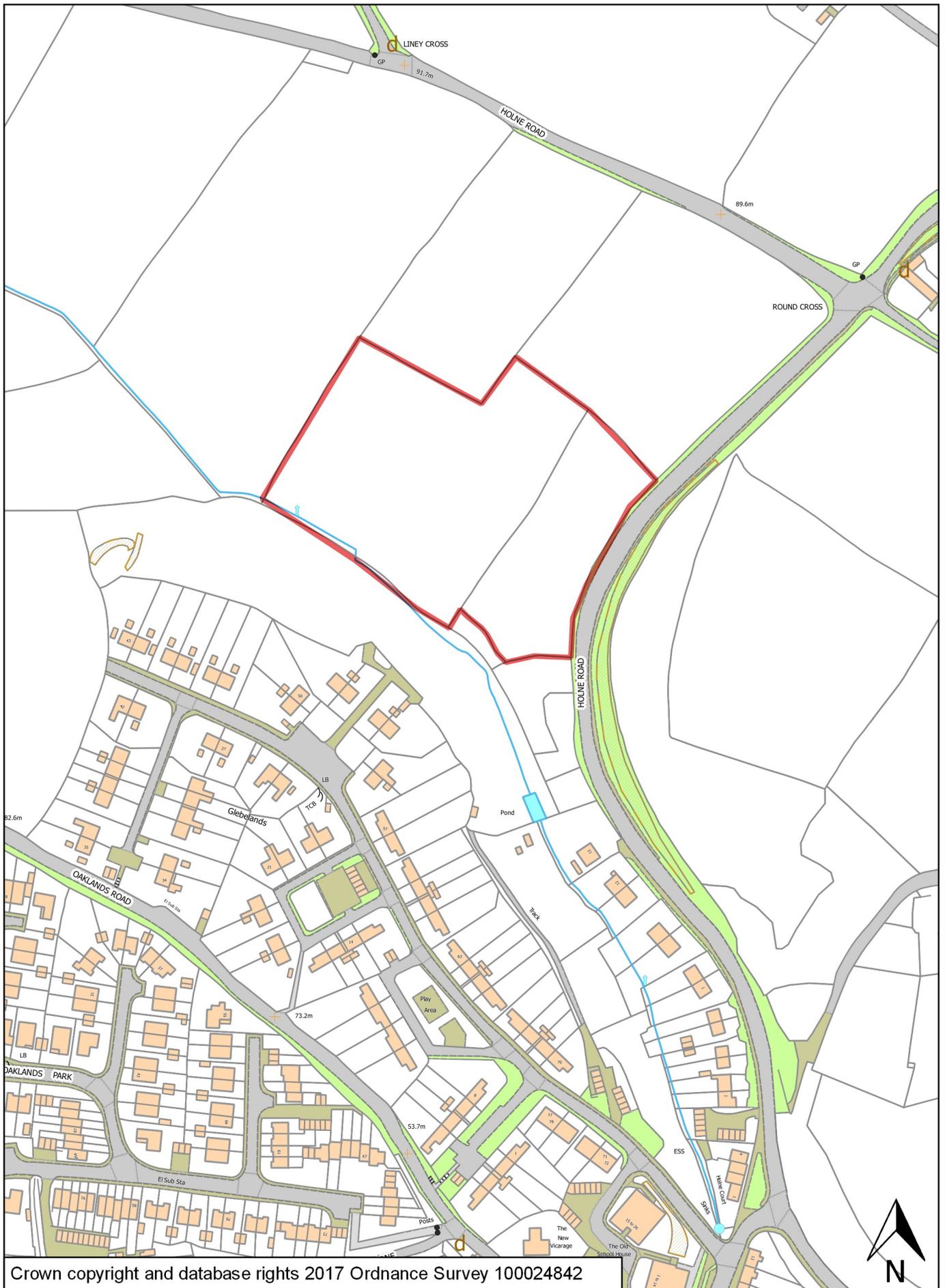
**Item No.** **Description**

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| 1. | 0452/18 - Residential development for up to 30 dwellings together with associated highways and drainage infrastructure, open space and landscaping (Outline Planning Permission), land at Holne Road, Buckfastleigh | Pg.19 |
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# 0452/18 - Land at Holne Road, Buckfastleigh



Scale 1:2,500



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1. Application No: **0452/18** District/Borough: **Teignbridge District**  
Application Type: **Outline Planning Permission** Parish: **Buckfastleigh**  
Grid Ref: **SX734667** Officer: **Louise Barattini**

Proposal: **Residential development for up to 30 dwellings together with associated highways and drainage infrastructure, open space and landscaping**

Location: **land at Holne Road, Buckfastleigh**

Applicant: **Burrington Estates**

Recommendation **That permission be REFUSED**

### **Reason(s) for Refusal**

1. In the absence of any on-site affordable housing provision on this allocated site (BCK2), with no significant over-riding environmental or community benefit, the proposal is contrary to policies COR15, DMD21 and BCK2 of the Dartmoor National Park Development Plan and to the advice contained in the English National Parks and the Broads UK Government Vision and Circular 2010 and the National Planning Policy Framework 2019.
2. In the absence of adequate ecological survey information on the risks posed by the development and suitable mitigating measures, due to the likely impact on the greater horseshoe bats and the likely significant effect on the South Hams Special Area of Conservation, the proposal is contrary to policies COR7 and DMD14 of the Dartmoor National Park Development Plan and to the advice contained in the English National Parks and the Broads UK Government Vision and Circular 2010 and the National Planning Policy Framework 2019.

### **Introduction**

This application proposes the development of 30 houses on land off Holne Road, Buckfastleigh; an allocated residential site within the Local Plan (policy BCK2).

It is an outline application with all matters reserved, except for access, and the proposal is for 100% market housing with off-site contributions toward affordable housing only.

The application is presented to Members at the request of the Head of Development Management as the officer recommendation is to refuse the proposal for this site which has been allocated for housing in the Local Plan.

### **Consultations**

County EEC Directorate: The application has been the subject of numerous pre-application discussions and correspondence prior to the submission of the application. The application is supported by a full Transport Statement prepared for the applicants by Banners Gate Transportation and the contents and conclusions of the Transport Statement is generally accepted and agreed by the Highway Authority.

The road junction and footways (which are to be

considered in detail at the outline application stage) are acceptable in principle from a highway safety point of view subject to the constraints of the highway network in the vicinity. The road junction complies with contemporary geometry and visibility standards and the impact of the additional vehicle movements on the highway infrastructure can be safely accommodated.

Suitable conditions are therefore recommended to be imposed on any planning permission granted.

Environment Agency:

No objection - flood zone 1 standing advice applies.

DNP - Archaeology:

No archaeological concerns are anticipated for the proposed development.

DNP - Trees & Landscape:

No objection - The land has been allocated for housing in the Local Plan (BCK2) and the potential harm to the landscape has been accepted by the Authority.

The boundary hedges are one of the defining features of this landscape and the development should enable the hedges to be retained and maintained in the long term. The indicative layout suggests all of the boundary hedges will be retained and most of the hedge sub-dividing the site will also be retained. I am happy with this approach. A small section of hedge will have to be removed to create an access onto the road. The removal of the hedge is inevitable if the site is to be developed because there is no other means of access onto the site. The loss of a small section of hedge will have minimal impact on the integrity of the roadside hedge.

A detailed landscape scheme has not been submitted, but a scheme can be requested when a detailed application is submitted.

South West Water:

No objections received

Devon County Council (Flood Risk):

The Drainage Management Plan indicates outline maintenance requirements for the operation of the proposed surface water management system.

The proposed surface water strategy indicates that underground tanks will be used to attenuate the increase in surface water runoff and will restrict the runoff to existing greenfield rates. The site is very steep and options for above ground features are therefore very limited.

It is noted that a 600mm culvert is proposed within the design however culverting would only be allowed for essential access purposes and it may require land drainage consent.

Full information on the detailed design of the surface water management system during construction and for the

Teignbridge District Council  
(Housing):

longevity of the site, including adoption and maintenance regime is required by condition.

The Devon Home Choice Register evidences 45 people in need of affordable housing with a local connection to Buckfastleigh.

DCC Strategic Planning  
(Education):

Devon County Council (DCC) has identified that the proposed increase of 30 family type dwellings will generate an additional 7.50 primary pupils and 4.50 secondary pupils which would have a direct impact on Buckfastleigh Primary and South Dartmoor College.

DCC has forecasted that there is currently capacity at the nearest primary and secondary school for the number of pupils likely to be generated by the proposed development and therefore a contribution towards education infrastructure will not be sought.

DCC does however require a contribution towards secondary school transport costs due to the development being further than 2.25 miles from South Dartmoor College.

The costs required are as follows: -

4.5 secondary pupils

£2.65 per day x 4.5 pupils x 190 academic days x 5 years =  
£11,328.00

All contributions will be subject to indexation using BCIS.

The amount requested is based on established educational formulae (which related to the number of primary and secondary age children that are likely to be living in this type of accommodation) and the cost of transportation from the development to South Dartmoor College. It is considered that this is an appropriate methodology to ensure that the contribution is fairly and reasonably related in scale to the development proposed which complies with CIL Regulation 122.

### **Parish/Town Council Comments**

Buckfastleigh TC:

The Parish Council objects on the following grounds:

Affordability – there is a need for low cost affordable/social housing and not market dwellings and the proposal should be rejected on basis not policy compliant. How and where will proposed off-site contributions be spent?

Economics - The town has few local amenities and shops and is moreover a dormitory settlement for surrounding conurbations. Spending and earnings are outside of the community.

Services – The town is struggling to retain young persons

and elderly services.

The travel plan is incorrect as the 88 bus is no longer in service on Sundays and bank holidays and has been cut back on weekdays. S106 monies towards children's services are one-off payments and not sustainable in the long term. Schools are under pressure of staffing cuts and the capacity quoted by Devon County Council is questioned. Any additional council tax benefits accrued would not benefit the local community.

Public Consultation – The local community does not want a development on this site which will result in additional pressure on local education provision, transport, health/medical resources, sewerage treatment capacity etc and no benefit to the local community with most homes being beyond the affordable reach of local people. Complaints have been received about the developer's online questionnaire which did not allow for objections.

Flood risk – Buckfastleigh is at increased risk of more frequent flooding from the River Mardle with several major incidents over the last few years. Concerns are expressed about adequate attenuation capacity being provided on site and adequate maintenance by a management company thereafter. Reference is also made to potential for overspill of untreated sewerage.

Sustainable Development & The Environment – There is no evidence that this development would be sustainable. There is no information on environmental impact or building materials and technologies. Will it provide a cohesive and inclusive society. What are the exceptional circumstances for a greenfield development within the National Park? National Parks are the last havens of wildlife in the country.

### **Relevant Development Plan Policies**

COR1 - Sustainable Development Principles

COR13 - Providing for high standards of accessibility and design

COR15 - Providing for limited new housing to meet local needs

COR2 - Settlement Strategies

COR21 - Dealing with development and transport issues in a sustainable way

COR3 - Protection of Dartmoor's special environmental qualities

COR4 - Design and sustainable development principles

COR6 - Protecting Dartmoor's Archaeology

COR7 - Providing for the conservation of Dartmoor's varied plant and animal life and geology

COR9 - Protection from and prevention of flooding

DMD13 - Archaeology

DMD14 - Biodiversity and geological conservation

DMD17 - Development on contaminated land  
DMD18 - Development on unstable land  
DMD1a - Presumption in favour of sustainable development  
DMD1b - Delivering National Park purposes and protecting Dartmoor National Park's special qualities  
DMD21 - Residential development in Local Centres  
DMD3 - Sustaining the quality of places in Dartmoor National Park  
DMD38 - Access onto the highway  
DMD4 - Protecting local amenity  
DMD40 - Parking provision - Residential  
DMD5 - National Park Landscape  
DMD7 - Dartmoor's built environment  
DMDBCK2 - Housing Land at Holne Road

### **Representations**

22 letters of objection 1 letter of support 2 other letters

Comments from supporters:

New housing is needed in the town for locals and to enable upsizing into a larger property without leaving the town.

Comments from objectors:

The majority of housing should be affordable. If not a single dwelling on site can be affordable then the site allocation should be reviewed as it is not fit for purpose. Contributions to off-site delivery are not acceptable.

The town will not benefit from market housing and it will not be affordable to local people. The development will appeal to second home owners, not locals, and local tax receipts will be less.

The environmental impact (in particular biodiversity) of the development questions the suitability of the site. The bat survey evidence is not complete and doesn't take into account a full assessment of the development impact (in particular light pollution). The SSSI (in particular its greater horseshoe species) and associated tourism will be adversely affected.

It will cause a significant reduction in the existing fauna in the SSSI sites adjacent to this development, as well as destroying the documented existing fauna at this site.

It ignores public consultation responses in the local community survey (affordable housing, parking and benefits for existing services are all deficient). The public consultation prior to the application submission was not amicable or positive.

It does not include renewable energy or low impact dwellings.

Local sewer capacity and pollution is an issue especially in this environmentally sensitive location.

It will add additional strain on local services (schools, doctors surgeries, highway network

& road safety).

No flood assessment undertaken in relation to the tertiary stream neighbouring Holne Court. The proposal that this tertiary river will be fed by surface water from the development will give rise to flooding of properties at Holne Court and further downstream.

The attenuation scheme will not be sufficient to satisfactorily deal with surface water drainage.

Public transport is very limited and on-site parking provision is deficient.

There is a badger sett located in the area.

There is no acknowledgment of Deptford Pinks in the Holne Road area and potential impact.

Concern is raised regarding construction noise and impact on bedrock and fabric of neighbouring buildings.

Insufficient evidence to support the need for additional housing in Buckfastleigh.

Adverse impact on views within the National Park.

Green fringes of settlements within National Parks should be protected.

There are better alternatives to developing on this site. Are the district quotas for housing being imposed on National Park land due to limited land resources within planning authority boundaries?

Site lines and road safety impacts are not acceptable. The report also fails to acknowledge construction traffic implications.

The scheme is too high density.

A brownfield site should be developed before this greenfield site is considered.

Why is it advertised as 'coming soon' – is it a done deal?

## **Observations**

### **HOUSING POLICY ALLOCATION**

The site is allocated for housing under Local Plan policy BCK2. The pre-text to the policy explains that the site should deliver a high quality development which reflects its sensitive rural fringe location, include recreation space to meet an identified shortfall in equipped children's play space and outlines the need for comprehensive bat surveys to facilitate an Appropriate Assessment (under the Habitats Regulations 2010) to be carried out in order to demonstrate that development at Holne Road would not have an unacceptable impact upon the integrity of the adjacent South Hams Special Area of Conservation.

It goes on to state that the opportunity for a pedestrian link through the area to the south

should also be explored.

The full policy requirement for BCK2 is set out below:

“An area of land 1.7 ha in extent adjacent to Holne Road, Buckfastleigh, is allocated for housing, not less than 50% of which should be affordable housing to meet identified local needs.

Proposals on this site should be supported by a development brief prepared in association with the local community and relevant stakeholders. Development of this site should include an area of recreational open space for community use. The proposal should be supported by evidence to inform an Appropriate Assessment in order to establish that development of this site will not impact upon the integrity of the South Hams Special Area of Conservation.”

Whilst the Parish Council and local community question the sustainability of new housing on this greenfield site due to concerns about existing service provision, the principle of residential development is accepted on this site and a sustainability appraisal undertaken at allocation. The site is also retained for housing in the consultation final draft of the Dartmoor Local Plan (Regulation 19) which identifies a development of around 28 homes.

The policy states that the application should be supported by a Development Brief. The applicant carried out a series of consultation events with the local community and planning department in preparing a masterplan for development of the site.

A Development Brief has not been adopted by the National Park Authority on this site; The National Park Authority is moving away from the Development Brief approach with its allocation sites within the Local Plan Review and is satisfied with the extent of public consultation carried out in advance of the formal planning submission.

## MAJOR DEVELOPMENT TEST

Paragraph 116 of the National Planning Policy Framework (NPPF) states that planning permission should be refused for major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. This is reiterated in policy DMD2 of the Local Plan.

The determination of whether a proposal amounts to 'major development' is a matter of planning judgement to be decided by the decision maker. It is not synonymous with the definition of a 'major planning application', but rather whether the development could be construed as major development in the ordinary meaning of the word having regard to the character of the development in its local context. Recent headline applications for major developments in England's National Parks include fracking, power line infrastructure, quarrying etc.

Having regard to the character, nature and scale of the proposed residential development on the edge of the Local Centre of Buckfastleigh, and taking the local circumstances and context into account, it is not considered to be a 'major development' under paragraph 116 of the NPPF.

## THE PROPOSAL

Despite the challenging topography of this steeply sloping site on the fringe of Buckfastleigh, forming part of the rural setting of the town, the application is for outline planning permission

with all matters reserved with the exception of access.

The submission includes a number of illustrative supporting documents, namely; Landscape Strategy Plan, Masterplan Site Layout Plan & Drainage Strategy Plan.

## HOUSING DENSITY AND AFFORDABILITY

The public has expressed concerns that the density of the application scheme is too high. The proposal is for 30 dwellings, which is around the 28 home figure quoted in the new Local Plan allocation for the site. The topography is challenging and a figure above this number is unlikely to yield an appropriate development in design terms and is similarly constrained by the requirement to protect greater horseshoe bat corridors through the site. However, housing type and size will impact on what is achievable at this density without resulting in an over-engineered development and compromising the character and appearance of this rural fringe of the settlement.

The illustrative plan shows a dominance of detached properties, with a small number of semi-detached units and two small 3 dwelling terraces. There are no flats/maisonettes incorporated into the illustrative plan. No illustrative section plans have been presented.

The Town Council and local community identify that there is a need for low cost affordable/social housing and not market dwellings and state that application should be refused as it is not policy compliant.

The Government recognises that National Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key service and this is set out clearly in the National Parks Circular 2010.

The purpose of allocated housing sites within the Dartmoor Local Plan is to ensure the delivery of affordable housing within the National Park's larger, more sustainable settlements. Hence, the whole objective for their allocation is to deliver on site affordable housing with the policy requiring a split of not less than 50% affordable housing, although this may be varied where a higher proportion of open market housing can be shown to be essential to secure the overall viability of development or the delivery of significant local infrastructure provision of clear benefit to the local community.

The application proposes 100% market housing on the site with an off-site contribution offer toward affordable housing.

The application has been supported by a viability statement, however, this has not been undertaken in accordance with the guidelines required in the National Planning Practice Guidance (NPPG) as it was undertaken in advance of submission before the requirement came in on 24 July 2018, however, the application was received on the 24 July 2018 and registered on the 23 August 2018.

Dartmoor's independent viability assessor has appraised the report and has the following misgivings; when submitted with the application in 2018 it was 6 months out of date, has not evidenced construction or sales figures provided in the report and does not follow the required NPPF guidelines on developer viability appraisals in particular with regard to calculating existing land value using the benchmarking land value technique. The applicant has been

asked to respond to these points but no updated viability report/addendum has been provided to date.

The evidenced need for Affordable housing is high in Buckfastleigh (the housing needs survey in 2014 identified a need of 36; of which 26 were current and 13 related to future need). This survey is now 6 years old, however, the Devon Home Choice Register reveals the pressing need for affordable housing in Buckfastleigh with 45 people on the list in need of affordable housing and all with a local connection to Buckfastleigh.

The housing strategy of the Dartmoor Local Plan is focussed on delivering affordable housing through on-site provision; given the high affordable housing need levels throughout the National Park this is the most timely way of delivering against this need. No robust evidence has been submitted to justify why affordable housing cannot be provided on site. Off-site affordable housing contributions in-lieu of provision on-site are not supported by current adopted policies.

Whilst the viability report clearly needs updating to include evidenced sales and construction figures, align with NPPG requirements for land value calculations, and to take into account further abnormal costs for land purchase of nearby land for bat mitigation (see biodiversity section of the report below), the scheme clearly fails to deliver any on-site affordable housing in direct conflict with local housing policies COR15, BCK2 and COR21 and the strategic objective for housing allocation sites on Dartmoor and thus the rationale for the policy BCK2.

#### IMPACT ON BIODIVERSITY & SOUTH HAMS SPECIAL AREA OF CONSERVATION (Greater Horseshoe Bats)

Policies DMD14 and COR7 are concerned with the conservation and enhancement of Dartmoor's biodiversity and this goes to the heart of National Park Purposes set out in policy DMD1b. Special Areas of Conservation (SAC) in the National Park are given the highest level of protection by these policies which are in turn supported by a European Directive, the Habitats Directive, which is transposed into UK law by various Regulations.

Special Areas of Conservation are international designations which are applied to sites whose habitats and species have significant ecological importance.

The South Hams SAC supports the largest population of Greater Horseshoe bats in the UK and lies partly within the National Park. Greater Horseshoe bats rely on an interlinked network of roosts, foraging habitat and commuting routes.

The application site is within close proximity (1km) of the Buckfastleigh Caves and Quarries Site of Special Scientific Interest (SSSI) which is a component roost of the South Hams SAC. Bat activity surveys were undertaken in summer 2017. Combined with earlier 2012 survey, they reveal foraging use of the site by Greater Horseshoe bats which makes the site highly significant, due to its close proximity to the SAC roost. The site is also used by Greater Horseshoe bats when they are commuting to and from the roost. Local policy and international law requires that development should not be approved where it will likely have a significant adverse effect on the integrity of the SAC and its wider natural network. Mitigation will be required for the adverse effects of the development on foraging and commuting Greater Horseshoe bats.

Inadequate information has been provided by the applicant, and that survey is now nearly three years old which means the Authority is unable to establish the development's likely

impact on the SAC. Given the above referenced evidence, that the site is currently used by Greater Horseshoe bats for foraging, the Authority are unable to determine that the development will not have a likely significant effect on the SAC. There is an absence of any mitigation proposal for permanent loss of foraging habitat, lack of detail about how to protect the bats using confirmed flight lines within the site, and the potential impact of changes to highways lighting on Holne Road.

If there is potential for development to have a likely significant effect on the SAC's Greater Horseshoe bat population, a Habitats Regulations Assessment (HRA) is required to be carried out by the Local Planning Authority.

Dartmoor National Park Authority is required to achieve the protection required by EU instruments through strict compliance with the Habitats Regulations. The onus is on the applicant to provide enough information in a planning application so DNPA ecologists can assess the proposals likely impact through an 'appropriate assessment' (AA). The Authority is required to consult with Natural England on all planning applications which might affect a SAC and take their advice into account when determining an application.

Where adverse effects to the integrity of a SAC are likely, the application must be refused unless there are exceptional circumstances known as the 3 derogation tests set out in the Habitats Regulations. The 3 tests are shown below and must all be met for a project having a likely significant effect to be approved:

- There must be no feasible alternative solutions to the plan or project which are less damaging to the affected European site(s)
- There must be "imperative reasons of overriding public interest" (IROPI) for the plan or project to proceed; and
- All necessary compensatory measures must be secured to ensure that the overall coherence of the network of European sites is protected.

The Local Planning Authority (LPA) cannot consent to projects without first ascertaining they will not have an adverse effect under the Habitats Directive by understanding a proposal's effects on an SAC as shown by an Appropriate Assessment (AA). As indicated above, on the basis of the evidence to date, the LPA has insufficient information to undertake this.

As the LPA is unable to complete the AA, it does not need to formally consider the derogation tests under DEFRA guidance, however, officers' informal view is that if there was sufficient information to complete the AA and if that confirmed a likely significant adverse impact on the SAC, there wouldn't be imperative reasons of over-riding public interest to grant this development in the National Park. This is because the proposal makes no on-site provision for affordable housing, a fundamental requirement of Dartmoor Local Plan's strategy for sustainable development and meeting local housing needs in the National Park.

## HIGHWAY SAFETY

The application is supported by a full transport statement. The proposed road junction and footways are considered acceptable in principle from a highway safety point of view, subject to the constraints of the highway network in the vicinity. The road junction complies with contemporary geometry and visibility standards and the impact of additional vehicle movements on the highway infrastructure can be safely accommodated. The proposal therefore complies with policies COR21 and DMD38.

## SUSTAINABLE URBAN DRAINAGE

THE NPPF and policies COR9 and DMD3 establish the requirements for ensuring new development does not increase flood risk. The public consultation raises concerns about adequate attenuation capacity being provided on site and future maintenance by a management company thereafter.

The site is within the low risk flood zone, however, it is a steeply sloping greenfield site with a watercourse at the base of the site and the River Mardle is located to the south within the town itself.

Given the steep gradient of the site, infiltration technology is not viable for the management of surface water drainage on this site. Attenuation tanks are proposed to slow surface water run-off and limit rates for this development to existing greenfield run-off-rates and so will not increase any risk to flooding. The proposal would therefore not conflict with policies COR9 and DMD3.

Full information on the detailed design of the surface water management system during construction and for the longevity of the site, including adoption and maintenance regime, would be required by condition.

## GEOTECHNICAL AND CONTAMINATION CONSIDERATIONS

Whilst one local resident expressed concerns about the impact on bedrock and fabric of neighbouring buildings, the Ground Investigation Report concludes no contamination threats or geotechnical constraints to development on this greenfield site. The proposal will not conflict with the objectives of policies DMD17 and DMD18.

## LANDSCAPE IMPACT

The site is situated within the settlement boundary of Buckfastleigh, at its northern edge. It is a steeply sloping agricultural field which is allocated for residential development in the Local Plan. The site separated from existing residential development by a narrow wooded corridor and given the elevated and sloping nature of the site, care needs to be taken to ensure an acceptable development in this site in terms of its integration with the existing settlement and landscape impact. Understandably, concerns have been expressed by local residents regarding impact on views in the locale.

Whilst the layout and design are reserved for future consideration (the plans submitted are indicative only) the allocation of this site has accepted that an engineered solution will be needed to be achieve a development on this site. The key consideration will be achieving an acceptable layout which works as much with the existing topography as possible to minimise this impact at any reserved matters application stage. Consideration should also be given to providing a public frontage to the development along the public highway at the access point.

Existing landscape features surrounding the site would need to be retained to maintain character and setting and for biodiversity considerations. The loss of a small section of hedgerow at the proposed access location will have minimal impact on the integrity of the roadside hedge.

The development of this site will not harm the character or appearance of this part of the Dartmoor National Park landscape, in line with policies COR1, COR3, COR4, DMD1b and DMD5.

## NEIGHBOUR AMENITY

There is an acceptable buffer distance between the site and existing residential properties and an acceptable detailed scheme for housing on the site could be accommodated without any adverse impact on residential amenity in line with policy DMD4.

Whilst some concerns have been expressed regarding noise disturbance during construction, a degree of disturbance is to be expected and can be considered through a construction management condition.

## HERITAGE INTERESTS

The site is located some distance from designated and undesignated heritage assets and having regard to the scale and nature of the proposed development on the site, no adverse impact on the cultural heritage of the National Park is anticipated in line with policies COR1, COR3, DMD7 and DMD1b.

## CONNECTIVITY WITH THE SETTLEMENT

The access details for the application incorporate a new footway along the western edge of the public highway (on DCC highway owned land) which connects with the existing footpath to the south. This will help to integrate the site with the settlement, providing a safe route on foot into Buckfastleigh and could be accommodated through off-site highway works.

Whilst the policy pre-text makes aspirations for a pedestrian link to be explored through the woodland area to the south; this involves third party land owners and has not come to fruition. This element is not included in the policy requirements and the pavement along the public highway will provide a satisfactory safe route and integration with the existing settlement.

## PUBLIC OPEN SPACE PROVISION

Allocation policy BCK2 requires development on the site to make provision for an area of recreational open space for community use to meet an identified shortfall in equipped children's play areas within the town.

Layout is not a consideration for this application. The illustrative layout suggests a vacant parcel of land on the lower part of the site to the south which is the more gently sloping part of the site. Detailed consideration would need to be given to any detailed layout to ensure that a meaningful and functional recreational open space can be accommodated in line with policy and evidenced need; it is accepted that the topography of the site places a number of constraints on this.

## INFRASTRUCTURE

Devon County Council's updated advice is that there is currently capacity at the nearest primary and secondary school for the number of pupils likely to be generated by the proposed development and therefore a contribution towards education infrastructure will not be sought.

A contribution towards secondary school transport costs of £11,328.00 is sought.

## CONCLUSION

Officers have been trying to work with the applicant over the last 2 years to give them the benefit of providing the additional information to demonstrate compliance with policy. We have been extending the timeframe for this application over and over again but have still had no concrete evidence in this time, or verification in principle, that the development can deliver the requisite planning policy tests in respect of affordable housing and ecological issues. These are key issues which go to the very heart of the National Park, its designation, statutory purposes and planning policies.

It is with regret that this application, which relates to a housing site allocated in the Local Plan, is recommended for refusal.

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**CHRISTOPHER HART**