



Quod

Planning Statement

Land at Ravensthorpe
Road, Dewsbury

CAAD Application

JUNE 2024

Q210823

Contents

1	Introduction	3
2	Land and Surroundings	5
3	Planning History	6
4	Pre-Application Consultation	8
5	Planning Policy	10
6	Appropriate Alternative Development Description	14
7	Applicant's Opinion on Appropriate Alternative Development	18
8	Planning conditions, S106 and CIL	21
9	Summary and Conclusions	22

Appendix 1 – Pre-application Masterplan Layout

Appendix 2 – Likely Planning Conditions

List of Figures

Figure 2-1: Site location with the Site outlined in red.	5
Figure 3-1: OPP detailed access layout with Site outlined in blue.	6
Figure 3-2: OPP Masterplan with the Site outlined in blue.	6
Figure 3-3: Kirklees HPP with the Site shaded in blue.	7
Figure 5-1: DRMF layout with Site outlined in red	12
Figure 6-1: Illustrative Layout Plan	15
Figure 6-2: West to east section across the Site.	16
Figure 6-3: Proposed road hierarchy.	16

List of Tables

Table 6-1: Proposed Development	14
---------------------------------	----

1 Introduction

- 1.1 We act for Dewsbury Riverside Limited (the 'Applicant'), the owner of the land to the south of Ravensthorpe Road, Dewsbury (the 'Site'.)
- 1.2 This Planning Statement supports an application for a Certificate of Appropriate Alternative Development ('CAAD') in respect of land at the Site.
- 1.3 The purpose of a CAAD is to assist in the assessment of the open market value of land following its compulsory acquisition by an acquiring authority, in this case by Network Rail for works permitted by the *Huddersfield to Westtown (Dewsbury) Transport and Works Act Order (TWAO)* (the 'Scheme').
- 1.4 It is necessary to consider whether, as at the Relevant Valuation Date (the 'RVD') of 3 April 2023, whether planning permission could reasonably have been expected to be granted for the development proposed within the application, or for any other form of development, in the circumstances known to the market at that time.
- 1.5 In undertaking the assessment of planning prospects, Section 14 of the Land Compensation Act 1961 requires the following assumptions to be made:
 - a) that the scheme of development underlying the acquisition had been cancelled on the launch date;
 - b) that no action has been taken (including acquisition of any land, and any development or works) by the acquiring authority wholly or mainly for the purposes of the scheme;
 - c) that there is no prospect of the same scheme, or any other project to meet the same or substantially the same need, being carried out in the exercise of a statutory function or by the exercise of compulsory purchase powers; and
 - d) if the scheme was for use of the relevant land for or in connection with the construction of a highway ('the scheme highway'), that no highway will be constructed to meet the same or substantially the same need as the scheme highway would have been constructed to meet.
- 1.6 When accounting for these assumptions in relation to the development proposed in this application, it must be assumed that Network Rail had cancelled the Scheme on the "launch date" of 31 March 2021 and that they had not undertaken any works in connection the Scheme.
- 1.7 Importantly, a CAAD is not a planning application and seeks to confirm the principle of development, but not the detail of what could have been approved. Information has been provided to identify an absence of constraints and to justify the potential scale/amount of development which could have been approved in so far as it is relevant

to the valuation process. For this reason, the application is not supported by extensive supporting information. The approach is consistent with Government guidance on the CAAD process including the submission requirements in the "[Land Compensation Manual Section 2: Compensation for land taken](#)".

- 1.8 This application seeks a positive certificate for a mixed use development residential use. This Planning Statement explains the Applicant's grounds for seeking the grant of the CAAD taking into account development plan policy and other material considerations. It is based on a **RVD of 3 April 2023** which is when permanent possession of part of the Site took place.

2 Land and Surroundings

- 2.1 The Site is located 2km south of Dewsbury Town centre within the residential neighbourhood of Ravensthorpe, adjacent to the Dewsbury to Huddersfield railway line and further south of the River Calder. The Site is within the Kirklees Council local planning authority administrative boundary.
- 2.2 An aerial photograph showing the location of the Site and its surroundings is presented in Figure 2-1 below.



Figure 2-1: Site location with the Site outlined in red.

- 2.3 The Site comprises agricultural land and is bounded by Ravensthorpe Road to the north, vegetation along the Network Rail to the northwest, woodland to the west and agricultural land to the south and east. Electricity pylons carry overhead cables north to south across the western part of the Site. The Site boundary also wraps around a row of houses on Ravensthorpe Road.
- 2.4 The Site has an overall area of approximately X hectares and is currently used for agriculture, with a public right of way running around the existing field layout in the eastern and southern section of the Site.
- 2.5 The Site forms a part of the wider strategic Housing Allocation HS61 in the Kirklees Local Plan (February 2019) for 4,000 homes and includes the main western access in the relevant masterplan (March 2019 Dewsbury Riverside Masterplan Framework (DRMF)). Further details are provided in Section 4.

3 Planning History

Planning History Prior to the RVD

- 3.1 The eastern section of the Site benefitted from an outline planning permission (OPP) granted on 12 April 2017 for up to 120 residential homes, with access from Ravensthorpe Road in detail (ref: 2016/60/94118/E). The detailed access in the OPP is located within the Site, with the residential homes proposed further east.
- 3.2 Extracts of the masterplan and detailed access from the OPP are provided in Figures 3-1 and 3-2 below.



Figure 3-2: OPP Masterplan with the Site outlined in blue.

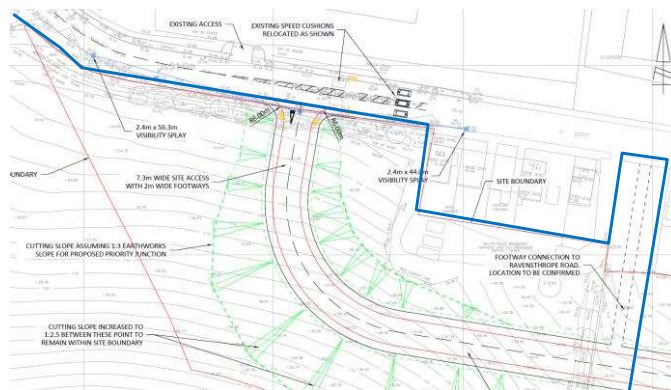


Figure 3-1: OPP detailed access layout with Site outlined in blue.

- 3.3 A reserved matters application (RMA) was submitted pursuant to the OPP for all matters for 120 residential homes on 27 April 2021 before the RVD but subsequently withdrawn on 1 November 2023 (ref: 2021/61/91759/E).

Planning History Post the RVD

- 3.4 There is no planning history on the Site post the RVD. However, Kirklees Council submitted a hybrid planning application for land to the south and east of the Site on 17 September 2021 prior to the RVD. The application sought approval for a residential-led development for 350 homes, with associated landscaping, parking, highways and

drainage infrastructure on land, which surrounds the Site to the south and east. Hybrid planning permission (HPP) was subsequently granted on 1 August 2023.

3.5 The illustrative masterplan layout is shown in Figure 3-3 for context.



Figure 3-3: Kirklees Council HPP with the Site shaded in blue.

Relevance of the Post-RVD Planning History

- 3.6 It is acknowledged that, at the time of the RVD, Kirklees Council had submitted the adjacent outline planning application and that it was not subsequently approved until after the RVD.
- 3.7 However, the Kirklees Council HPP is relevant as the proposals were submitted and public knowledge prior to the RVD and relate to a masterplan on the adjacent land within Housing Allocation HS61 to which any proposal on the Site would need to consider ensuring the full 4,000 homes in the housing allocation could be delivered.

4 Pre-Application Consultation

4.1 A pre-application was held with Kirklees Council Planning Officers on 13 October 2022, where the process for the CAAD application and an initial masterplan for the Site (included as **Appendix 1**) were discussed.

4.2 The key comments from the meeting comprised:

- **Land uses** – Residential land uses would be supported, with any other uses to be considered when the application is made;
- **Developable Area** – Layout and supporting information will need to further consider noise, drainage and air quality impacts from the road and railway;
- **Layout** – The DRMF stepped away from the roundabout to the north, with the housing arrangement shown up against the retaining wall is not desirable;
- **Density** – There is potential to provide flatted blocks in the north of the site near the roundabout due to the proximity to the station, this would provide opportunities to better address site levels, create a legible entrance to the site and reduce density elsewhere across the site;
- **Housing Mix** – Local Plan Policy LP 11 seeks proposals to meet known need, with some guidance on mix set out in the 2016 Strategic Housing Market Assessment (SHMA);
- **Affordable Housing** – The Interim Affordable Housing Policy provides guidance on housing mix per area within the borough and should be considered by the proposed housing mix;
- **Retaining Walls** – Proposals could be improved through more sensitive arrangement of retaining walls to reduce their dominance and through providing through loop roads for improved permeability;
- **Masterplan Integration** – Further details of connections to the wider DRMF should be shown, with access through the site to later phases considered to the south to be incorporated;
- **Public Rights of Way (PRoW)** – The PRoW along the east and south should be fronted by the housing;
- **Biodiversity** – Biodiversity net gain would be expected in the proposals or as an off-site contribution; and
- **Public Open Space** – Provision of c.1.05 hectares were supported, which should be provided as different types such as open space and allotments.

4.3 The illustrative masterplan layout has since been refined to respond to the pre-application feedback through:

- A change of access from Ravensthorpe Road with an initial spur arrangement reducing the visual dominance of the access and passive provision for a future four arm roundabout as shown in the DRMF;

- Landmark buildings proposed in the north to aid legibility to the Site;
- Removal of abrupt retaining walls, with level changes addressed more sensitively through the Site;
- Improved integration with the adjacent masterplan land to the south and east, with housing facing southwards and roads providing passive links to the adjacent masterplan land; and
- Reduction in cul-de-sacs to improve the permeability of the layout.

5 Planning Policy

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decision makers to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise.

Adopted Development Plan at the RVD

5.2 The development plan at the RVD comprised:

- The Kirklees Local Plan (adopted 27 February 2019); and
- Kirklees Local Plan - Allocations and Designations (adopted 27 February 2019)

5.3 The whole of the Site was allocated within Housing Allocation HS61 for 4,000 homes of which 1,869 homes within the plan period along with associated social, highways, green and drainage infrastructure.

5.4 Other designations included the Pennine Foothills Biodiversity Opportunity Zone and the Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone

5.5 Housing Allocation HS61 requires a masterplan to be prepared for the wider site that incorporates considerations for landscaping, open space, education requirements, place shaping and access. The DRMF was prepared for this purpose and approved by Kirklees Council in March 2019 as the relevant masterplan for Housing Allocation HS61.

5.6 Other key Local Plan policies of potential relevance to residential use were:

- **Policy LP7 ‘Efficient and effective use of land and buildings’** - proposals should allow access to adjoining undeveloped land so it may be subsequently developed and should achieve a net density of at least 35 dwellings per hectare;
- **Policy LP11 ‘Housing Mix and Affordable Housing’** – housing should be of high quality and design, contribute to creating mixed and balanced communities and provide a minimum of 20% of units in affordable housing tenures;
- **Policy LP20 ‘Sustainable travel’** – proposals for new development shall be designed to encourage sustainable modes of travel and demonstrate how links have been utilised to encourage connectivity;
- **Policy LP21 ‘Highways and access’** - proposals shall demonstrate amongst others, that they can accommodate sustainable modes of transport, do not have a severe impact on the highway network and take into account emergency and refuse access;

- **Policy LP22 ‘Parking’** – car parking provision in new developments will be determined by the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development;
- **Policy LP24 ‘Design’** - the form, scale, layout and details of all development should respect and enhance the character of the townscape, heritage assets and landscape, provide a high standard of amenity and include high levels of sustainability;
- **Policy LP28 ‘Drainage’** - presumption is that Sustainable Drainage Systems (SuDS) will be used on each site and on greenfield sites and typical greenfield run-off rates should not be exceeded;
- **Policy LP63 ‘New open space’** - New open space should be provided in accordance with the council’s local open space standards.

Other Material Considerations

Local Guidance

[Kirklees Open Space SPD \(adopted June 2021\)](#)

- 5.7 The Open Space SPD sets out the open space requirements for new residential development to provide amenity green space at 14.58m² per unit and for schemes between 51-200 units to provide a minimum 400m² Local Equipped Area of Play (LEAP).

[Kirklees Highway Design Guide SPD \(adopted November 2019\)](#)

- 5.8 The SPD sets out a series of overarching ‘place-making’ principles that permeate through each and every aspect of good highway design, including prioritising pedestrians and cyclists first, inclusivity, legibility connectivity, permeability, functionality, safety, durability, adaptability and sustainability.

[DRMF \(approved March 2019\)](#)

- 5.9 The DRMF was approved by Kirklees Council in March 2019 as the relevant masterplan to support the delivery of Housing Allocation HS61. Whilst it is not a formal policy document or guidance, it is a material consideration for planning applications within the HS61 area until a new masterplan supersedes it.
- 5.10 The DRMF identifies existing constraints and sets out how strategic access, open space, social infrastructure and housing can be delivered to across six linked neighbourhoods.
- 5.11 The DRMF identifies the Site as an area comprising housing, open space and four spur roundabout junction to Calder Road and Ravensthorpe Road as shown in Figure 5-1.



Figure 5-1: DRMF layout with Site outlined in red

National Policy

National Planning Policy Framework

5.12 The National Planning Policy Framework ('NPPF') (July 2021) would have been an important material consideration when determining a planning application at the RVD.

NPPF Residential Policy

5.13 The NPPF supports the Government's objective of significantly boosting the supply of homes (Paragraph 60) and states that strategic policy-making authorities should identify suitable locations for such development in order to help meet identified needs in a sustainable way (Paragraph 73).

NPPF Design Policy

5.14 Paragraph 126 states that good design is a key aspect of sustainable development, with Paragraph 130 setting out that design considerations for planning decisions

5.15 Paragraph 134 states that development that is not well designed should be refused, specifically where it does not reflect local design policies and government guidance on design. It attaches great weight to: (a) development which reflects local design policies including guidance and supplementary planning documents such as design guides and codes; and to (b) outstanding or innovative designs which promote high levels of sustainability, help raise the standard of design more generally in an area and fit in with the overall form and layout of their surroundings.

NPPF Transport Policy

- 5.16 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

NPPF Natural Environment Policy

- 5.17 Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by measures, including providing net gains for biodiversity and preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution or land instability.

6 Appropriate Alternative Development Description

- 6.1 This section provides information about the description and parameters of the alternative development that the Applicant considers would reasonably have been expected to have been granted planning permission at the RVD of 3 April 2022.
- 6.2 The Applicant is seeking to confirm that the uses and the scale/amount of development would have been granted planning permission, along with the conditions and other obligations to which that development would have been subject (addressed in following Section 8).
- 6.3 The justification for concluding that these uses and the scale/amount of development would reasonably have been expected to have been granted planning permission is set out in Section 7.

Use

- 6.4 This application seeks confirmation that planning permission would reasonably have been expected to have been granted for residential use (use class C3) at the RVD.

Amount

- 6.5 This CAAD application seeks to establish a notional permission for an alternative development of 169 homes, with associated landscape, parking, access and drainage, as set out in Table 6-1 below.

Table 6-1: Proposed Alternative Development

Detail	Amount					
Homes	169 homes at 35 dwellings per hectare					
Housing Mix	Tenure	Amount				
		1-bed and 2-bed apartments	2-bed houses	3-bed-houses	4-bed houses	Total
	Market	22	16	51	45	134
	Affordable	15	10	10	-	35
	Total	37	26	61	45	169
Affordable Housing	35 homes = 20.7% of all homes					
Landscape	<ul style="list-style-type: none"> 1.06 hectares of public open space 2 x 100m² Local Area of Play 1 x 400m² LEAP 					
Parking	<ul style="list-style-type: none"> Car parking = at least one off-street space per home Cycle parking = At least 1 cycle space per home 					

Building Heights	▪ Between 1-3 storeys
Drainage	▪ 4 x attenuation ponds

Layout

6.6 Figure 6-1 below displays an illustrative layout for the alternative development from the supporting Design Process Document.



- | | |
|--|---|
| 1. Strong 2-3 storey frontage north | 6. Play integrated into POS |
| 2. Attractive gateway attenuation & planting | 7. Positive outlook onto future development |
| 3. Green lung to development | 8. Opportunity for connections |
| 4. Secure development parcels & back to back distances | 9. Buffer to woods |
| 5. Landmark buildings, attractive corners | 10. Attenuation |

Figure 6-1: Illustrative Layout Plan

6.7 The illustrative layout establishes an appropriate alternative development for the Site and is designed to be consistent with the DRMf principles, policy requirements and emerging Kirklees Council HPP masterplan for the adjacent land at the RVD. Whilst also responding to pre-application feedback from the Kirklees Council.

6.8 There are significant level changes across the Site, which the illustrative layout has shown how it could be sensitively addressed through the location of road and public open space, as shown in Figure 6-2 below.



Figure 6-2: West to east section across the Site.

Transport and Access

6.9 A spur onto Ravensthorpe Road is shown in the illustrative layout along a similar alignment to the extant OPP (ref: 2016/60/94118/E), with a road layout providing links to the adjacent land to the east in the same location as the DRMF and adjacent HPP.



Figure 6-3: Proposed road hierarchy.

6.10 Pedestrian access is provided alongside the full extent of the proposed highway network allowing access to the housing, public open space and passive links to adjacent land within the wider DRMF site. Cycle access is proposed on-street within the Site and linking to wider strategic cycle routes.

Appearance

6.11 Appearance is a detailed matter which goes beyond the description of development and is not therefore necessary to consider within this application. However, Section 14 of the Design Process Report provides illustrations of the likely character of the proposed housing, which would be designed to complement the local characters in the area and would be subject to conditional approval.

Landscape

6.12 The illustrative layout incorporates site wide drainage requirements and provides four attenuation ponds integrated into the landscape, with a LEAP proposed in the east (number 6 in Figure 6-1) and two LAPs to be integrated elsewhere into the amenity space.

6.13 Planting is shown across the Site to provide a green lung to the development, buffer planting, increases in biodiversity and to provide high quality public open space.

6.14 Overall, landscape is a detailed matter that would be dealt with by planning conditions, with proposed landscaping conditions set out in **Appendix 2** of this Planning Statement.

7 Applicant's Opinion on Appropriate Alternative Development

Acceptability of Alternative Land Uses

- 7.1 This CAAD application seeks to establish the acceptability of an alternative development for residential use (use class C3) on the Site for 169 homes, of which 35 homes (20.7%) would be provided in affordable housing tenure and supported by on-site green infrastructure, including public open space and play space.
- 7.2 The Site falls within the wider Housing Allocation HS61 for 4,000 homes, with the DRMF, the relevant masterplan for the housing allocation at the RVD, identifying the Site for residential development.
- 7.3 An illustrative development with a housing mix based on the previously agreed mix proposed in the April 2021 RMA (ref: 2021/61/91759/E) and with 20.7% provided in affordable housing, would respond to local need and be supported by Local Plan Policy LP11. Specific affordable housing tenures and mix would be a detailed matter that would be secured through planning obligations.
- 7.4 The illustrative layout shows a minimum residential density 35 dwellings per hectare and allows access to the adjoining undeveloped land so it may be subsequently developed, as required by Local Plan Policy LP7.
- 7.5 Whilst detailed design and layouts would be conditioned on any planning permission, Section 17 of the Design Process Document confirms that all houses would meet the Nationally Described Space Standards required for all housing.
- 7.6 Therefore, residential land use would be an acceptable land use, with the proposed mix of unit sizes and tenures also supported by Local Plan Policy at the RVD.

Design

- 7.7 The main design considerations relate to the consistency with the relevant masterplan for Housing Allocation HS61 at the RVD, the DRMF, and whether appropriate provision of play and public open space could be provided.
- 7.8 Design considerations are also set out in Local Plan Policy LP24, which considers that the form, scale, layout and details of all development should respect and enhance the character of the townscape, heritage assets and landscape, provide a high standard of amenity and include high levels of sustainability.
- 7.9 These strategic principles are established in the DRMF, with detailed design and appearance a detailed matter which goes beyond the description of development and is not therefore necessary to consider within this application.

Masterplanning Considerations

- 7.10 The illustrative layout follows the design intent of the DRMF by using a similar block structure and back to back distances, with minimal blank walls and tree lined streets. Access from Ravensthorpe Road is shown as a spur, but the layout also allows for the four arm roundabout in the DRMF to be used to support later phases of the wider housing allocation. The internal roads also following the DRMF approach to allow passive links to the adjacent land.
- 7.11 The main access from Ravensthorpe Road shows an active link to the adjacent Kirklees Council HPP masterplan layout to demonstrate how known wider links through adjacent land could still be achieved.
- 7.12 Building heights would range from one to three storeys to respond to the level changes across the Site and following the hillside typology example in the DRMF.

Landscape, Amenity and Play Space

- 7.13 A range of public open space and play space is shown in the illustrative layout. Local Plan Policy LP63 and the Kirklees Open Space SPD require provision of amenity green space at 14.58m² per home equating to 0.25 hectares for the 169 home illustrative layout and for development between 51-200 homes to provide a minimum 400m² LEAP.
- 7.14 The illustrative layout shows that 1.06 hectares of public open space could be achieved, exceeding the 0.25 hectare standards, with above standard provision of play achieved by a 400m² LEAP and two 100m² Local Areas of Play.

Transport matters

- 7.15 Local Plan policies LP20, LP21 and LP22 seek that proposals encourage sustainable modes of transport, provide car parking standards based on the public transport availability and accessibility of the site and ensure there are not severe impacts to the highway network.
- 7.16 The proposed layout shows that cycle access would be provided across the Site, with a standard of at least one cycle space per home achievable and would be expected to be secured through conditions.
- 7.17 A Transport Matters Statement accompanies this application and explains that the DRMF recommends that off-site highways mitigation is not required until the 710th dwelling. When the illustrative layout for 169 homes is seen cumulatively with the Kirklees Council HPP, only 519 homes would have been proposed at the RVD and would not have triggered the need for mitigation recommended in the DRMF.
- 7.18 Overall, the Transport Matters Statement concludes that traffic impacts would be less than severe and that the alternative development sought by the CAAD application should not have been prevented or refused on highways grounds.

Other Matters

Drainage

- 7.19 The DRMF provides guidance on strategic drainage principles in line with Local Plan Policy LP28.
- 7.20 A supporting Drainage Technical Note identifies the likely drainage attenuation requirements, which then informed the illustrative alternative development layout and shows how the attenuation in the form of four ponds could be reasonably achieved on the Site.

Air Quality and Noise

- 7.21 The illustrative layout sets back the homes from both the railway corridor and Ravensthorpe Road, with tree planting shown around the north of the housing plots. Together with the existing planting along the railway corridor, this approach would limit effects of noise and air quality on residents, with reasonable mitigation likely to be able to be provided in a detailed scheme and likely conditions.

Summary

- 7.22 In summary, the alternative development on the Site would have been consistent with the DRMF and achieve the standards for on-site open space and play in the Local Plan and supporting guidance, as well as not resulting in severe impacts on the highway. Detailed matters could have been reasonably addressed through conditions (see **Appendix 2**) and through the detailed design stage.
- 7.23 It is therefore reasonable to assume planning permission would have been granted at the RVD for the alternative development at the Site.

8 Planning conditions, S106 and CIL

Planning Conditions

A list of planning conditions that would have been appropriate at the RVD and informed by Kirklees Council's pre-application response from the 22 October 2022 meeting are included in **Appendix 2**. These include conditions relating to time limits, detailed landscaping, materials, site investigations and highways details amongst others.

S106 obligations

8.1 As recommended in Kirklees pre-application response, if planning permission was to be granted for major residential development at the site, Section 106 Heads of Terms would be likely to include:

- 20% affordable housing, and details including tenure split, locations, designs, unit size mix and delivery;
- Off-site open space contribution to address shortfalls in specific open space typologies;
- Education and childcare contribution;
- Formula-based contributions towards off-site highway works at affected junctions;
- Sustainable Travel Fund contribution;
- Public transport improvement contribution;
- Travel Plan monitoring contribution;
- Biodiversity net gain contribution (if net gain is not achieved on-site);
- Drainage management and maintenance arrangements, and participation in a HS61-wide drainage working group;
- Agreement to enable adjacent development, and to not create and/or exploit ransom scenarios; and
- Arrangements for the establishment of a management company for the management and maintenance of any land not within private curtilages or adopted by other parties, including open space.

Community Infrastructure Levy

8.2 Kirklees Council have not adopted a Community Infrastructure Levy charging schedule and therefore, there would have been no liability for the alternative development.

9 Summary and Conclusions

- 9.1 This application for a CAAD pursuant to section 17 of the 1961 Act is considered fully justified.
- 9.2 The analysis of the site context, planning policy and other material considerations for the Site provides clear evidence as to the acceptability of the principle of development.
- 9.3 In particular, how the relevant masterplan principles in the DRMF have been followed and how public open space, play space, density and affordable housing could achieve the Local Plan policy requirements and other material considerations for the Site's uses.
- 9.4 Given the policy context and the planning considerations at the RVD, it is clear that planning permission would have been granted for the development described in Section 7 above at the Site.
- 9.5 For these reasons, and as evidenced in detail throughout this Planning Statement, a Certificate of Appropriate Alternative Development should be granted at the RVD for that development, subject to the conditions and contributions described in Section 8 and **Appendix 2**.