

Committee	PLANNING COMMITTEE A	
Report Title	134 PEPYS ROAD, LONDON, SE14 5SG	
Ward	TELEGRAPH HILL	
Contributors	Russell Brown	
Class	PART 1	1 st December 2016

<u>Reg. Nos.</u>	DC/16/098361
<u>Application dated</u>	19.09.2016
<u>Applicant</u>	Mr T Hennessey
<u>Proposal</u>	The construction of a single storey wrap-around extension to the rear of 134 Pepys Road, SE14.
<u>Applicant's Plan Nos.</u>	Design & Access Statement; Heritage Statement; G176-101; G176-121 Rev A; G176-122 Rev A; G176-123 Rev A; G176-130 Rev A; G176-131 Rev A; G176-140 Rev A G176-100 Rev A Received 3rd October 2016 G176-300 Rev A; G176-401 Rev A Received 24th October 2016 G176_200 Rev A Received 9th November 2016 G176_301 Rev B; G176_302 Rev B; G176_400 Rev B Received 10th November 2016 G176-950 Rev A; G176-951 Rev A; G176-952 Rev A; G176-953 Rev A; G176-954 Rev A Received 16th November 2016
<u>Background Papers</u>	(1) Case File DE/48/134/TP (2) Core Strategy (June 2011) (3) Development Management Local Plan (November 2014) (4) London Plan (March 2016)
<u>Designation</u>	Telegraph Hill Conservation Area
<u>Screening</u>	N/A

1.0 Property/Site Description

- 1.1 The application site is on the west side of Pepys Road, to the north of the junction with Drakefell Road (A2142) where there is a mini roundabout with an exit to Avignon Road too.
- 1.2 The property itself is a two storey plus lower ground floor semi-detached single family dwellinghouse with a canted bay topped by a turret to the right of the front

door. It is built from yellow London stock brick with a multi-pitched artificial slate roof, recessed porch and stucco surrounds framing the aluminium casement windows. The property also benefits from a dropped curb, crossover and front driveway with space for one vehicle bounded by black metal gates and railings.

- 1.3 Parts of the rear of the property and garden are visible from the south side of Drakefell Road. This elevation features a bay window to the side of the original three storey addition, double doors to the rear elevation of the main house and a small lean-to to the rear of the original addition.
- 1.4 The site is within Telegraph Conservation Area, subject to an Article 4 direction, but is not a listed building nor in the vicinity of one. It has a PTAL rating of 3/4.

2.0 Relevant Planning History

- 2.1 DC/16/096927: The replacement of aluminium casement windows with double glazed timber sash windows at 134 Pepys Road, SE14. **Granted.**

3.0 Current Planning Application

- 3.1 Planning permission is sought for the construction of a single storey extension to the rear (west) of the site. It would wrap around the three storey addition and would form the boundary with no. 132, but would not project beyond the existing side (south) elevation building line, being 1.4m from the boundary with no. 136.
- 3.2 The proposed extension is proposed to measure 5.665m wide, 2.022m of which would infill the side return, which would involve the removal of the bay window. It would be 8.9m deep, 2.1m of which would extend past the original addition facilitated by the demolition of the existing lean-to. It would be 4.4m high where it would meet the rear wall of the main house and 3.4m high where it would meet the rear and side walls of the original addition with an eaves height of 2.5m.
- 3.3 It would feature two rear doors leading onto a patio, three windows and three rooflights, all for the kitchen / dining area, in the multipitched roof.
- 3.4 The materials proposed are dark stained timber cladding over matching brick for the external walls, natural slate tiles for the roof and powder coated aluminium for the windows and doors.

4.0 Consultation

- 4.1 Pre-application advice was twice sought where Officers on both times advised that the principle of the proposal was acceptable and it should be of a high quality, modern design. It should also be subordinate to the main dwellinghouse and have an acceptable impact in terms of neighbouring amenity. Advice was also given on roof design, eaves height and the visibility of the rear of the site.
- 4.2 The Council's consultation met the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 4.3 Site and public notices were displayed and letters were sent to six adjoining residents, Telegraph Hill Ward Councillors, the Telegraph Hill Society and the Council's Conservation Officer.

Written Responses received from Local Residents and Organisations

- 4.4 Two objections were received from the same property raising the following concerns:
- The size and proximity of the proposed extension to the boundary of no. 136 would reduce the sense of space and overall light, compounded by the fact that the application property is higher than no. 136 by virtue of being on a hill.
 - The removal of many of the original Victorian features, like the original French doors and bay window, is concerning and compromises the integrity of the building given that it will never be replaced.
 - The style of and materials for the extension are different to the original house and the horizontal wooden cladding is out of keeping with other buildings in the area that are constructed of brick laid vertically.
 - The proposed extension would be visible from Drakefell Road, thereby altering the appearance of the Conservation Area, and the alteration of the original building would result in the loss to Lewisham's historical environment.
 - Views of Telegraph Hill Park would be obscured by the extension.
 - The rooflights would cause light to shine into bedroom windows at night.

The Telegraph Hill Society also objected, raising the additional comments below:

- The size and design of the proposed extension would cause substantial harm both to the building and, in terms of a cumulative contribution, to the character of the Conservation Area.
- There are precedents for refusals at planning committees for rear extensions where the side bay window was removed, and the precedents provided by the applicant's agent do not involve the removal of this feature.
- The light spillage from the rooflights would be visible from Drakefell Road.
- The kitchen is currently well lit by the side bay window, negating the need for rooflights if the extension was re- designed.
- The design features "square blocky plate glass windows", offset roofline, little ornamentation and oddly shaped windows to the side. None of the materials proposed respect nor compliment the form, period, architectural characteristics and detailing of the original building. No justification has been provided for these.
- Wrap-around extensions destroy the relationship of the original rear extension with the building as a whole.
- The proposal would be contrary to DM Policies 30 parts 1, 2 and 5, 31 part 1 and 36 part 4 and should be refused.

They later added that the location of the proposed extension at a higher floor level than no. 136 would result in overshadowing, loss of light and a wind-tunnel effect.

Copies of letters are available to Members.

5.0 Policy Context

Introduction

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-
- (a) the provisions of the development plan, so far as material to the application,

- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

5.2 Section 38(6) of the Planning Compulsory Purchase Act 2004 makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, Development Plan Document (DPD) (adopted in June 2011), DMLP (adopted in November 2014) and policies in the London Plan (March 2016). The NPPF does not change the legal status of the development plan.

National Planning Policy Framework

5.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14 a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary this states that (paragraph 211) policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.

5.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

Other National Guidance

5.5 On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

London Plan (March 2016)

5.6 On 14 March 2016 the London Plan (consolidated with alterations since 2011) was adopted. The policies relevant to this application are:

- Policy 7.4 Local character
- Policy 7.6 Architecture
- Policy 7.8 Heritage assets and archaeology

Core Strategy

- 5.7 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Spatial Policy 1 Lewisham Spatial Strategy
Spatial Policy 5 Areas of Stability and Managed Change
Core Strategy Policy 15 High quality design for Lewisham
Core Strategy Policy 16 Conservation areas, heritage assets and the historic environment

Development Management Plan

- 5.8 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Core Strategy and the London Plan is the borough's statutory development plan. The following policies are relevant to this application:-

DM Policy 1 Presumption in favour of sustainable development
DM Policy 30 Urban design and local character
DM Policy 31 Alterations/extensions to existing buildings
DM Policy 36 New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens

Residential Standards Supplementary Planning Document (updated May 2012)

- 5.9 Paragraph 6.2 (Rear Extensions) states that when considering applications for extensions the Council will look at these main issues:
- How the extension relates to the house;
 - The effect on the character of the area - the street scene and the wider area;
 - The physical impact on the host building, and the amenity of occupiers of neighbouring properties;
 - A suitably sized garden should be maintained.
- 5.10 Paragraph 6.4 (bulk and size) advises that extensions should be smaller and less bulky than the original building and reflect its form and shape. Traditionally, extensions to buildings are subsidiary to the main structure. Over-dominant extensions may destroy the architectural integrity of existing buildings and may be out of character with adjacent buildings.

Telegraph Hill Conservation Area Character Appraisal (March 2008)

- 5.11 The Telegraph Hill Conservation Area is a well-preserved planned development of late 19th century terraces and pairs of houses built under the control of the Worshipful Company of Haberdashers. The buildings are good examples of late 19th century middle class houses and villas with many surviving design features. There is a strong sense of group identity to the houses in the Conservation Area due to a limited palette of materials and common design elements.

- 5.12 The application site is located in Character Area 1(a) and is marked up as a building making a positive contribution to the area.

6.0 Planning Considerations

- 6.1 The relevant planning considerations are the impact of the proposal on the character and appearance of the existing building, on the Telegraph Hill Conservation Area and on the amenities of neighbouring occupiers.

Design

- 6.2 NPPF Section 7 Requiring good design states that the Government attaches great importance to the design of the built environment.
- 6.3 Paragraph 63 of the NPPF states that ‘in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area’. Paragraph 131 states that ‘in determining applications, local planning authorities should take account of the desirability of new development making positive contribution to local character and distinctiveness.
- 6.4 Core Strategy Policy 15 states that the Council will apply national and regional policy and guidance to ensure highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character.
- 6.5 Core Strategy Policy 16 states that the Council will ensure that the value and significance of the borough’s heritage assets and their settings, conservation areas, listed buildings, archaeological remains, registered historic parks and gardens and other non designated assets such as locally listed buildings, will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and Historic England best practice.
- 6.6 DM Policy 30 states that the Council will require all development proposals to attain a high standard of design, including alterations and extensions to existing buildings. DM Policy 31 Alterations and extensions to existing buildings including residential extensions states that development proposals for alterations and extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings. High quality matching or complementary materials should be used, appropriately and sensitively in relation to the context.
- 6.7 DM Policy 36 states that the Council will require a statement that describes the significance of the asset and its setting and an assessment of the impact on that significance for development proposals affecting heritage assets. Also required is clear and convincing justification if the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting. The Council will not grant planning permission where:

- a. alterations to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials; or
- b. development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the Conservation Area.

- 6.8 The Telegraph Hill Conservation Area Character Appraisal identifies 134 Pepys Road as a building that makes a positive contribution to the Conservation Area. The Appraisal states that “being in good condition and relatively unaltered externally, all of the 19th century buildings make a positive contribution to the special character and appearance of the conservation area”. This is despite the fact that several of these properties on Pepys Road include single storey rear extensions. This would imply that despite having rear extensions, these buildings continue to make a positive contribution to the special character of the conservation area.
- 6.9 The Character Appraisal goes on to discuss the condition of the conservation area (which is described as good) and list the type of small changes to the external appearance of individual houses that are beginning to erode the special interest of the area. This is within Section 5 (Condition of the Conservation Area), which does not include additions to the rear of the property.
- 6.10 The Telegraph Hill Society have objected to the loss of the existing bay window on the side elevation of the original rear addition and state that this would be detrimental to the integrity of the building and, when considered cumulatively with changes to the rear of buildings in the conservation area, would result in harm to the character and appearance of the Conservation Area.
- 6.11 The Society state that the Conservation Area Appraisal makes reference to the rear of properties being as uniform as the front. However, on further examination, the Appraisal states that “there are good views of the backs of houses, as uniform in design as the fronts”. The appraisal refers to the original design of the buildings and remains silent on whether the properties are generally unaltered to the rear. An aerial view of Pepys Road reveals that several of the properties feature rear extensions and conservatories. The Society’s objection states that inappropriate development has eroded this feature.
- 6.12 This objection to the application is therefore recommending changes to the way that the Council makes decisions on rear extensions based on the Society’s opinion that rear extensions are “eroding the character of the area”. Any changes to the SPD to include rear extensions in the list in Section 5 would need to be supported by appropriate evidence being gathered and public consultation being undertaken. This process has not occurred and it would not be appropriate for the Council to start making decisions on this basis.
- 6.13 It is important to note that both the precedents that the Telegraph Hill Society cite (DC/14/87791 at 41 Gellatly Road and DC/14/89277 at 65 Erlanger Road) were recommended for approval by officers, but were overtuned by members at Planning Committee meetings. The reason for refusal for the former, in brief, were the extension being overbearing, visually intrusive and bulky by reason of its height, depth and location, resulting in an increased sense of enclosure, poor outlook and level of light for neighbouring occupiers, who would also have

suffered from light overspill from the proposed rooflights. The latter, although the refusal reason made mention of the loss of the side bay window, was refused on the grounds of its design and visibility from the public realm, therefore being unsympathetic to the architectural integrity of the building and failing to preserve or enhance the special character and appearance of the Conservation Area.

- 6.14 Conversely, applications at the Ground Floor Flat, 104 Pepys Road (DC/15/90028), 82 Drakefell Road (DC/13/84319) and 88 Drakefell Road (DC/14/90279) have been approved despite the loss of the side bay window. Therefore, it would not be unreasonable to refuse planning permission on the basis of the loss of this feature given the aforementioned consented schemes. Officers note that the removal of the bay window does not constitute development and therefore does not require permission in its own right.
- 6.15 The guidance contained in the NPPF states that the more important the asset, the greater the weight should be given to the asset's conservation. If the Council were to require the retention of the bay, it would unjustifiably preclude any form of development to the side return of the property. It is considered that preventing the removal of the bay would be seeking to afford the building with a level of protection that is inappropriate to its status and has no policy justification.
- 6.16 In terms of the extension itself, whilst the maximum depth of its projection is large at 8.9m, its scale is considered to be subordinate to the main building, given the bulk of the original three storey rear addition.
- 6.17 Whilst the roof form of the side extension is contemporary, its design pays homage to the traditional multi-pitched roof form and cleverly seeks to reduce its impact on the host property in terms of its bulk. Its design is therefore considered to complement the form of the host property and would have an acceptable relationship with it.
- 6.18 The extension is proposed in London stock brick behind dark stained timber cladding and powder coated aluminium for the windows and doors, the latter two of which are contemporary materials not seen on the rear elevation of the property. However, there is no policy requirement that prevents the introduction of contemporary elements provided that they complement the host building, which they are considered to do. A condition shall be added requiring details of the timber cladding, the proposed stain and for its maintenance. This is considered to address the Telegraph Hill Society's concerns that the materials do not "respect nor compliment the form, period, architectural characteristics and detailing of the original building. Additionally, it is noted that the Councils Conservation Officer has not objected to the proposals.
- 6.19 The use of slate for the roof is a traditional material in Conservation Areas and is a welcome improvement on the artificial slate originally proposed, which Officers sought to change given the part of the extension most visible from Drakefell Road would be the roof.
- 6.20 DM Policy 31 requires residential extensions to retain an accessible and usable private garden that is appropriate in size in relation to the size of the property and to retain 50% of the garden area. According to the plans, the existing garden is approximately 111m². The proposal would result in a garden of about 83.7m²,

which is 75.4% of the existing area. Therefore, sufficient garden space would be left by the proposal.

- 6.21 The two rear doors in addition to the four rooflights would help to bring light into the new space that comprises a dining and kitchen area.
- 6.22 The three rooflights in the pitched roof of the side return part of the proposed extension have been rationalised so that they are in line and would not be visible from the public realm. Therefore, no objection is raised to their insertion.
- 6.23 The proposed scale, form, design and materials proposed for the rear extension are considered by Officers to be of a high quality and appropriate for the building and the Telegraph Hill Conservation Area. As such, the proposal complies with Core Strategy Policies 15 and 16, DM Policies 30, 31 and 36 and paragraphs 6.2 and 6.4 of the Residential Standards SPD.

Impact on the amenity of neighbouring occupiers

- 6.24 DM Policy 31 states that residential development should result in no significant loss of privacy and amenity (including sunlight and daylight) to adjoining houses and their back gardens.
- 6.25 The proposal is not considered to have any significant impact on the amenities of the property to the north, no. 132, given that the part of the extension to the rear of the original three storey addition would be a modest 85cm deeper and 90cm taller than the existing lean-to.
- 6.26 However, there is the potential for the extension to impact upon no. 136. Whilst it would not have any significant impact on noise or levels of daylight, sunlight or associated overshadowing given the proposed domestic use of the extension, the orientation of the site and the sloping roof with an eaves height of 2.5m at 1.4m off the boundary, there is the potential for reduced outlook and loss of privacy.
- 6.27 Officers acknowledge that the extension would be 2m closer to the boundary fence with no. 136, but given the relatively modest eaves height and 1.4m distance to the boundary, it is not considered to be significantly overbearing or create a sense of enclosure even with the lower ground level at no. 136.
- 6.28 It is possible obscure views might be had of Telegraph Hill Park from the side windows of no. 136, but Officers consider that the loss of these obscure views would not lead to the overall loss of a significant amount of outlook, and that the loss of a view is not a reason upon which a refusal reason could be based.
- 6.29 The provision of three windows in the side (south) elevation of the extension would face the fence with the upper parts of two windows being visible over the fence. Officers consider that the outlook from these windows toward the fence would be comparable with that which occurs from the existing side bay windows.
- 6.30 Concern has been raised light spillage from the proposed rooflights, but this is not considered significantly worse than light spillage from the existing bay window, and is not considered sufficient grounds to warrant the refusal of planning permission.

6.31 Therefore, the proposal is considered to have an acceptable impact on neighbouring amenity.

Equalities Considerations

6.32 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

6.33 In summary, the Council must, in the exercise of its function, have due regard to the need to:

- (a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- (b) advance equality of opportunity between people who share a protected characteristic and those who do not;
- (c) Foster good relations between people who share a protected characteristic and persons who do not share it.

6.34 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

6.35 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>

6.36 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Meeting the equality duty in policy and decision-making
3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

6.37 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

- 6.38 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.

Conclusion

7.0 The Local Planning Authority has considered the particular circumstances of the application against relevant planning policy set out in the Development Management Local Plan (2014), the Core Strategy (2011), London Plan (March 2016) and the National Planning Policy Framework (2012).

8.0 It is considered that the proposal is appropriate in terms of its scale, form, design and materials and therefore would not result in harm to the appearance or character of the dwellinghouse, the Conservation Area or the amenities of neighbouring occupiers.

9.0 RECOMMENDATION: GRANT PLANNING PERMISSION subject to the following conditions:

- 1) The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

- 2) The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

G176-101; G176-121 Rev A; G176-122 Rev A; G176-123 Rev A; G176-130 Rev A; G176-131 Rev A; G176-140 Rev A

G176-100 Rev A Received 3rd October 2016

G176-300 Rev A; G176-401 Rev A Received 24th October 2016

G176_200 Rev A Received 9th November 2016

G176_301 Rev B; G176_302 Rev B; G176_400 Rev B Received 10th November 2016

G176-950 Rev A; G176-951 Rev A; G176-952 Rev A; G176-953 Rev A; G176-954 Rev A Received 16th November 2016

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

- 3) No development shall commence on site until details of the type of timber cladding, the stain proposed to be applied to it and details for its future maintenance have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the extension and to comply with Policies 15 High quality design for Lewisham and 16 Conservation areas, heritage assets and the historic environment of the Core Strategy (June 2011) and DM Policies 30 Urban design and local character and 36 New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens of the Development Management Local Plan (November 2014).

INFORMATIVES

Positive and Proactive Statement: The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive and proactive discussions took place with the applicant prior to the application being submitted through a pre-application discussion. The proposal was broadly in accordance with those discussions, but further information was submitted to bring it in accordance with the Development Plan.