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# Appeal Decision

Inquiry held on 10, 11, 29 April and 1 May 2013

Site visit made on 1 May 2013

**by Mrs K.A. Ellison BA, MPhil, MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 29 May 2013**

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**Appeal Ref: APP/G2713/A/12/2179922**

**White House Farm, Stokesley, North Yorkshire TS9 5LE**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Northumbrian Land Ltd against the decision of Hambleton District Council.
  - The application Ref 11/01300/OUT dated 10 June 2011 was refused by notice dated 11 May 2012.
  - The development proposed is a mixed use development comprising housing (use class C3) up to 213 units and employment (class B1) up to 2900sqm, landscaping, means of access and associated infrastructure works.
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## Decision

1. The appeal is dismissed insofar as it relates to housing. The appeal is allowed insofar as it relates to employment. Planning permission is granted for employment (class B1) up to 2900sqm, landscaping, means of access and associated infrastructure works at White House Farm, Stokesley in accordance with the terms of the application Ref 11/01300/OUT dated 10 June 2011 and the plans submitted with it, so far as relevant to that part of the development hereby permitted and subject to the conditions set out in the attached Annex 1.

## Preliminary Matters

2. The proposal is made in outline with all matters reserved except for access. In accordance with the provisions of the *Town and Country Planning (Development Management Procedure) (England) Order 2010 (SI 2010 No. 2184)* (DMPO) in force at the time of the planning application, additional information was provided relating to the form of the proposed development set out on Plan 10119/SK102(E) Proposed Site Diagram. Whilst the DMPO has since been amended so that those requirements are no longer in force, the information on this plan informed the Appellant's viability appraisal and the Council's assessment of the proposal. On that basis, I have had regard to it in coming to my decision. Furthermore, since the number of dwellings would also have implications for viability, it was agreed at the Inquiry that the description should be amended to reflect the number actually proposed. I have therefore determined the appeal as concerning: *a mixed use development comprising housing (use class C3) up to 193 units and employment (class B1) up to 2900sqm, landscaping, means of access and associated infrastructure works.*
3. The proposal is accompanied by two Planning Obligations, each of which provides for an open space scheme, with one providing for 15% affordable housing, the other for 20%.

4. Subsequent to the Inquiry, an application for costs was made by Northumbrian Land Ltd against Hambleton District Council. That application will be the subject of a separate Decision.

### **Main Issues**

5. The main issues are whether the proposal makes appropriate provision for affordable housing, having regard to local and national planning policy and the evidence as to viability; and whether suitable measures are in place to ensure the delivery of open space, sport and recreation facilities.

### **Reasons**

6. The appeal site consists of two areas of land, one to the north and the other to the south of Westlands, which is the main route into Stokesley from the west. Although described as a mixed use development, the site to the north would contain housing, with the site to the south being developed for employment uses. Access to the housing site would be from a roundabout, with a separate access being provided further west to serve the employment site. Most of that part of the appeal site to the north of Westlands is covered by the allocation in Local Plan policy SH1 (although it should be noted that the site extends further west than the area shown on the Policies Map). The land to the south is allocated under policy SE2.

### **Issue 1 - provision for affordable housing**

7. The proposal makes provision for either 15% or 20% affordable housing, by way of alternative Planning Obligations and viability appraisals were provided in support. It is the Appellant's case that the scheme as proposed can viably deliver 15% affordable housing (29 units). Thus, although it was confirmed at the inquiry that the development would still be likely to proceed at 20% affordable housing, I have taken 15% as the starting point for my assessment of the appeal proposal. The Council has provided an appraisal which indicates that the development as proposed, but with different assumptions as to build costs and other factors, would be viable with the provision of 44% affordable housing (85 units).
8. Both appraisals proceeded on the same assumptions as to commercial floorspace and values. Key differences related to build costs, professional fees, developer profit, contingencies and the mix of affordable housing to be provided. Before considering the merits of the appraisals however, it is necessary to consider the principle of a mixed use proposal and its relationship to the provision of affordable housing.

### *Local planning policies and a mixed use development*

9. Development plan policies of particular relevance to the provision of affordable housing as part of this proposal are set out in the Core Strategy<sup>1</sup> and the Allocations<sup>2</sup> documents. Core Strategy policy CP1 sets out in broad terms the objective of sustainable development and states that proposals will be assessed against a number of considerations including the community's housing, economic and social requirements. Policy CP9 sets a target of 50% affordable housing as a guide for Stokesley and goes on to state that the actual provision

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<sup>1</sup> Hambleton LDF - Core Strategy Development Plan Document Adopted April 2007

<sup>2</sup> Hambleton LDF - Allocations Development Plan Document (with Proposals Maps) Adopted December 2010

on individual sites will be determined through negotiations, taking into account viability and the economics of provision. In the Allocations document, policy SH1 allocates a site of 6.6ha at White House Farm and Crab Tree Farm, Stokesley for housing development subject to a number of considerations including that a target of 50% of dwellings should be affordable. The starting point for this proposal, therefore, is that site SH1 should deliver 50% affordable housing unless there is information as to viability and the economics of provision which indicates otherwise.

10. According to the Council, the employment element of this mixed use development would result in a commercial loss of £1.4m, equivalent to 11-12 units of affordable housing. No formal assessment has been provided by the Appellant but at the inquiry the loss was acknowledged to be in the region of £2m, if account was also taken of the allowance for letting voids.
11. Policy SH1 goes into some detail as to density, capacity and phasing as well as setting the target of 50% affordable housing. It deals with a number of issues a proposal would be expected to address and goes into some detail as to matters which might require developer contributions, even to the level of cycle and footpath links. The policy makes clear the relationship of this site to the adjacent sites for housing and open space (SH2 and SC1). It makes no reference to the employment site to the south. The supporting text to SH1 gives further information as regards the development requirements set out in the policy, covering key matters such as layout, affordable housing, open space and access. Again, no mention is made of site SE2.
12. Turning to policy SE2, this follows a similar structure wherein it sets out the type of development expected and then deals with more detailed issues and matters which might require developer contributions. The policy indicates that the disused farm buildings will be developed for high quality starter units. The wording of the policy makes no reference to housing site SH1. In the supporting text, there is a reference to SH1 when setting out the context for the site. There is another which states that access from Westlands will be in conjunction with that for the residential site to the north, possibly by means of a new roundabout.
13. The Allocations DPD also contains a diagram showing the sites allocated in this part of Stokesley. This includes an arrowhead linking across from SE2 to SH1.
14. These are policies from a recently examined Local Plan whose wording I consider to be easily intelligible and not at all ambiguous. Requirements which might impose costs on a development have been identified in a systematic way and are clearly articulated. In that context, it is hard to conceive that the Council would have failed to be explicit with regard to a cross subsidy of the scale indicated. Thus, read objectively and in context, I consider that the policies as worded do not require that housing site SH1 should be brought forward in conjunction with, and in support of, the employment site SE2. Nor could such a construction be placed on the information provided in diagrammatic form. The title is 'Diagram SH1/SH2' and it is placed between the two housing policies, in a context where the access to SH2 is to be taken via SH1.
15. Consequently, I find no support in the Local Plan for the proposition that there should be some degree of cross subsidy between site SH1 and site SE2. It follows, from this, that I see no basis in the Local Plan to suggest that the level

of affordable housing provision on SH1 should be subordinated to the development of employment land on SE2.

16. In the event that it was necessary to look behind the policies, the evidence contained in the various background papers to the Allocations DPD does not alter my interpretation of the development plan set out above.
17. My attention has been drawn to a note of discussions at the Stokesley Area Forum<sup>3</sup>, where the Council records the developers as referring to a cross subsidy between the White House Farm housing allocation and the employment allocation to the south (SE2). In addition, evidence from the Appellant's agent at the time of the Allocations DPD Examination talks about the intention to deliver site SE2 alongside SH1 and a comprehensive planning application being submitted. However, whilst these do provide an indication of the landowner's intentions, they are a far cry from recognising that they represented a public benefit which should be carried across into the development plan, irrespective of the Appellant's view that the need for a cross subsidy was self evident. My views are further strengthened in that the very thorough supporting evidence on affordable housing targets set out in the 2009 report<sup>4</sup> and the subsequent critique<sup>5</sup> make no reference to the likelihood of a cross subsidy. Nor does the brief reference in the Inspectors' Report<sup>6</sup> to the possibility of shared infrastructure strike me as being intended to show that cross subsidy between the sites was a matter which the Inspectors had taken into account.
18. I take the point that there is no requirement to demonstrate a need for site SE2 to be developed in a manner which would accord with the development plan. However, in this appeal it is a factor in a viability appraisal which seeks to justify affordable housing at a lower level than the target in an adopted policy. Consequently, any benefits in bringing forward site SE2 by this route need to be identified so that they can be weighed in the balance when considering viability and the economics of provision.
19. From the information provided at the inquiry, it seems that the main reason for bringing the two sites forward at the same time is, primarily, that they are in the same ownership. Since that is a private matter for the landowner, it can carry no weight. A letter of support was also provided explaining that the office development would be a valuable addition to a company's property portfolio. It may well be that, based on the Appellant's general experience of the local market, there is a reasonable prospect that the site would be occupied and the employment units could yield a suitable return. However, such an approach takes no account of the existing availability of units in the area and, in this respect, the Council points out it has recently granted permission for an extension to the nearby Stokesley Business Park. Irrespective of its longer term prospects therefore, there appears to be no public benefit in bringing the site forward at this time. It was also suggested that site SE2 would not be developed within the plan period unless it was brought forward alongside SH1. Even if this turned out to be the case I am mindful that, in the first instance, it would be for the local planning authority to consider how to address any local plan allocation which was not taken up.

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<sup>3</sup> Report to Stokesley Area Forum 27 October 2008

<sup>4</sup> Viability studies of housing sites, JR Stroughair, 2009

<sup>5</sup> Housing viability study critique, District Valuer Services 2010

<sup>6</sup> Report to Hambleton District Council 1 September 2010

20. The basis for a mixed use proposal does not draw support from the policies in the development plan and no public benefits of any substance have been demonstrated. As a result, I consider that little weight can be attached to the cross subsidy between the housing and employment components of this mixed use scheme as part of the assessment of viability and the economics of provision.

*Evidence as to viability*

21. In relation to plan-making, national policy<sup>7</sup> expects that sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. When taking account of the normal cost of development, a site should provide competitive returns to a willing land owner and a willing developer. Further advice is available in the 2012 RICS guidance note *Financial viability in planning* as well as *Viability Testing Local Plans 2012*, prepared by the Local Housing Delivery Group.

Build costs

22. The difference between the Appellant's and the Council's estimates as to build costs was in the region of £3 - £3.5m or the equivalent of 25 - 30 affordable housing units. In support of the Appellant's figure, a feasibility estimate was provided by a quantity surveyor (the F&G estimate). The Council's figure was based on the Building Cost Information Service (BCIS).
23. The Appellant refers to the RICS guidance that BCIS may lack the level of detail and robustness required and that, in general, a quantity surveyor input will be necessary in many instances<sup>8</sup>. I have also been referred to training advice<sup>9</sup> prepared by the former head of development viability at the District Valuer Services, who have also provided viability advice to the Council for the purposes of this appeal. The training advice similarly indicates a preference for an estimate prepared by a qualified expert, noting that undue reliance on BCIS can compromise the accuracy of a valuation.
24. The guidance from RICS is given in the context of a discussion of non-standard developments and complex schemes. The extract from the training advice is within a section concerned with assessing the relationship between the build specification and sales values and whether the design is the most cost effective way of delivering the development. It seems to me that these documents draw attention to the need to test whether an appraisal is supported by a suitably robust assessment of build costs. To my mind, the robustness of the Appellant's assessment depends particularly on the extent to which it reflects the proposal as made.
25. The F&G estimate states that it is based on the illustrative masterplan, with the construction costs being based on similar projects adjusted to reflect the quality of the proposed housing. The background information from F&G makes specific reference to stonework, bay windows, slate and clay tile roofs and dormer windows. The BCIS is seen as unsuitable as it is based on average cost which does not reflect the quality of the project. The appeal scheme is described as aiming at the higher end of the market, with an appearance which would not lend itself to economies of scale due to lack of repetition and use of

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<sup>7</sup> National Planning Policy Framework paragraph 173

<sup>8</sup> Financial viability in planning, 4.2.2

<sup>9</sup> Development Valuation Training for Cornwall County Council 22 May 2012, p28

higher quality materials. At inquiry, the Appellant also confirmed that the estimate was based on non-standard house types and an appropriate palette of materials, describing the scheme as somewhere between the standard product of a volume housebuilder and 193 bespoke units. It was contended that the cost was based on standard layouts with variations to reflect the intended quality of the scheme and the intention to aim at the upper quartile of the housing market. Clearly therefore, matters of quality and the absence of economies of scale have been highly influential in the assessment of build costs relied upon by the Appellant.

26. However I am not convinced that this is a reasonable interpretation of the appeal proposal as made. The layout on the illustrative masterplan is typical of a modern housing estate, with plot sizes being within a range commonly found in large, modern housing developments. Also, the arrangement of the units indicates considerable scope for repetition of house types. I note the emphasis in the Design and Access Statement on the quality of the proposed scheme, with its references to a garden village and contemporary interpretation of the vernacular design. However, as was noted in the committee report, this principle has not been transferred to the masterplan.
27. In addition, this is an outline proposal where matters of appearance and layout have been reserved and it cannot be assumed that the Appellant company would also be the developer. As such, considerable uncertainty exists at this stage as to whether the Appellant's stated commitment to a scheme of above average quality would be carried through into any detailed scheme. In this respect, the Appellant proposed that a condition be used which required the reserved matters to be in accordance with the principles and objectives set out in Plan SK102(E) and the Design and Access Statement. However, the Council has already indicated its view that any reserved matters application would need to readdress the layout<sup>10</sup>. Also, as might be expected with an outline proposal, the principles and objectives of the plan and the Design and Access Statement are set in somewhat general terms. Consequently, even if my doubts could be overcome as to whether it was possible to formulate a condition in sufficiently precise terms to satisfy Circular 11/95<sup>11</sup>, it would not necessarily be sufficient to ensure that the materials used in the eventual scheme were of similar quality and cost as those which informed the viability appraisal.
28. Since the assessment of build costs provided by the Council is based on BCIS, it is not sufficiently specific to this development as to represent anything more than a guide. Also, the appraisal it informed is open to criticism in that costs are based on good quality estate housing whereas revenues assume upper quartile housing. Nevertheless, the difference in estimated build costs indicates that the pursuit of such a high degree of quality would have a significant adverse effect on the level at which affordable housing could be delivered whilst still ensuring the site was viable. Given the lack of certainty as to whether the scheme actually proposes such quality or that it would be able to ensure its delivery, I can attach little weight to this element of the appraisal.

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<sup>10</sup> Committee report, paragraph 5.8

<sup>11</sup> Circular 11/95, *The Use of Conditions in Planning Permissions*

### Other differences

29. There were also differences in the appraisals with regard to contingencies and professional fees; the mix of properties provided for use as affordable housing; developer profit and benchmark land value.
30. Contingencies and professional fees are assessed as a percentage of build costs so that it was the percentage, as much as the quantum, which was at issue. Although the employment element would involve previously developed land, this represents a small proportion of the overall scheme. The residential element would take place on land currently in use for agriculture and there is no indication at this stage that particular provision should be made for unexpected costs. Bearing in mind that the Development Valuation training guide suggests greenfield sites should be at the lower end of a range of 0-5%, I consider that there is insufficient evidence to support the Appellant's allowance of 5%. Similarly, since I have not accepted that the delivery of a high quality scheme can be ensured, I consider that an allowance of 10% for professional fees is above the range warranted by the proposal as it stands.
31. The Appellant's appraisal assumes the mix of affordable housing units would be in proportion to the composition of the overall scheme<sup>12</sup>. I appreciate that this reflects the Appellant's reading of the 2011 Strategic Housing Market Assessment. However, the number of 4 bed units in the scheme results in a relatively higher overall cost for the affordable housing element. Also, the Council has provided good evidence that the current need relates mainly to 2 and 3 bed housing, based on the most recent local housing needs surveys, the active housing register and homelessness records. As such, by allowing for a significant proportion of 4 bed units, it is likely that the Appellant's appraisal has overestimated the cost of provision of the affordable housing units within the appeal scheme.
32. The RICS guidance states that a developer's profit allowance should be at a level reflective of the market at the time and should include the risks attached to the specific scheme. With that in mind, the findings of the Inspector at a recent appeal<sup>13</sup> are of limited assistance in assessing the merits of this proposal. The same applies to the information provided by the Council as to profit levels in other schemes. The scheme appraised would contain a higher proportion of market housing compared to the target in policy SH1 so that this would affect the level of risk, if only in respect of the longer time taken to dispose of the market units. However, given my reservations as to the justification for a mixed use proposal and the assumptions as to build costs, it follows that I can attach little weight to the profit as estimated.
33. It was also suggested that the benchmark land value should be taken from the 2009 viability study carried out for development plan purposes. Since market conditions fluctuate over time, this would not be consistent with the RICS advice, which emphasises the need for site value to reflect the workings of the market<sup>14</sup>.

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<sup>12</sup> 26 x 2 bed, 85 x 3 bed, 82 x 4 bed

<sup>13</sup> APP/X0360/A/12/2179141 8 January 2013

<sup>14</sup> Financial viability in planning, 3.3.3 and E1.9-1.10

### *Summary*

34. The development plan expects that site SH1 should deliver 50% affordable housing unless there is information as to viability and the economics of provision which indicates otherwise. The Appellant has provided an appraisal in support of its case that the site can viably deliver 15%. However, I have found that little weight can be attached to the cross subsidy between the housing and employment components of this mixed use scheme or to the build costs contained in the appraisal. The lion's share of the shortfall against the target can be attributed to these two factors. In addition, the appraisal appears to make unduly generous allowance for contingencies and professional fees and to overestimate the economics of providing the affordable housing units. For these reasons, I consider that the appraisal is not sufficiently robust to show that the proposal makes appropriate provision for affordable housing. The information provided as to viability and the economics of provision fails to establish the basis for a target other than 50% affordable dwellings so that the proposal fails to accord with Core Strategy policy CP9 and policy SH1 of the Allocations DPD in this respect.
35. The main areas of concern with regard to the Appellant's viability appraisal to support 15% affordable housing provision relate to the cross subsidy to the employment element and estimated build costs. Similar assumptions as to a mixed use scheme and build costs inform the appraisal to support the alternative proposition from the Appellant, of providing 20% affordable housing. As such, it would likewise fail to demonstrate that the target of 50% of affordable dwellings should not be observed.

### ***Issue 2 - the delivery of open space, sport and recreation facilities***

36. Amongst other things, Policy SH1 refers to developer contributions towards the provision and equipping of land at Site SC1, a site for recreation and other community uses.
37. The completed Planning Obligations make provision for the submission of an open space strategy to be approved by the Council before development commences. The Council was unable to give an assurance that it was satisfied as to each person's title to the relevant land. However, evidence of title was provided at the Inquiry.
38. I am satisfied that the Obligations would be an acceptable mechanism for the delivery of open space, sport and recreation facilities so that I find no conflict with policy SH1 in this respect.

### **Other Matters**

39. Although described as a mixed use development, the employment development would be severable from the housing element. Whilst there may be questions as to its viability in isolation from the housing scheme, it was agreed at the inquiry that this element of the proposal accords with the development plan. Bearing in mind the presumption in favour of sustainable development therefore, I see no reason why planning permission for this part of the proposal should not be granted.



## Conditions

40. I have imposed conditions based on those suggested by the Council in the light of the discussion at the inquiry and the advice in Circular 11/95, *The Use of Conditions in Planning Permissions*. A condition requiring full details of the site access is necessary in the interests of road safety. Conditions relating to renewable energy and a travel plan are reasonable in order to secure a sustainable form of development. Those relating to drainage are necessary to ensure a satisfactory form of development. A condition requiring a Construction Method Statement is necessary to protect the living conditions of nearby residents and in the interests of road safety during the construction period.

## Conclusions

41. The proposal accords with relevant development plan policies insofar as it brings forward sites SH1 and SE2 for the uses identified in the Allocations DPD. It is also generally in accord with the more detailed requirements in those policies, including with regard to the delivery of open space, sport and recreation facilities. However, it is contrary to policy SH1 with regard to the departure from the target of 50% affordable housing and conflicts with policy CP9 since the 15% (or 20%) offered has not been shown to be justified with regard to viability and the economics of provision. The target in SH1 was recently tested at examination and is set out in an up to date Local Plan. There is good evidence that the level of need is no less pressing today and, indeed, the provision of affordable housing is strongly supported by the local community<sup>15</sup>. Given the considerable importance which the Local Plan attaches to the provision of affordable housing this is sufficient, in my judgement, to outweigh the benefits identified, including those of bringing forward a site to meet general demand for market housing. In this regard, it was accepted at the inquiry that the failure of this particular scheme would not necessarily mean that site SH1 would not come forward for housing. On balance therefore, I conclude that the proposal does not accord with the policies of the development plan as a whole.
42. I have considered this proposal in the context of the presumption in favour of sustainable development. The Appellant contends that the Council cannot demonstrate a five year supply of deliverable housing sites so that relevant policies for the supply of housing should not be considered up to date<sup>16</sup>. However, since policy CP9 concerns levels of affordable housing provision and policy SH1 allocates a specific site, they do not constitute part of the framework for the supply of sites in the District so that I do not agree that they should be regarded as policies for the supply of housing. In any event, site SH1 is to be the main source of new housing for Stokesley in the plan period and this proposal would deliver affordable housing at a much lower level than sought through a recently adopted Local Plan document without showing adequate justification. In the face of the evidence as to need, such harm would significantly and demonstrably outweigh the benefits of the development as proposed. Thus, even if I am wrong in my view that the relevant policies

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<sup>15</sup> In this respect, it was a notable feature of this inquiry that all the interested parties who gave oral evidence expressed support for the provision of new housing but opposed this proposal due to its under-provision for affordable housing.

<sup>16</sup> National Planning Policy Framework paragraph 49

should not be taken as out of date, the proposal would not benefit from the presumption in favour of sustainable development.

43. For the reasons given above, I conclude that the appeal should be allowed in relation to employment development but dismissed in relation to residential development.

*K.A. Ellison*

Inspector

Richborough Estates

## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY:

Giles Cannock QC	Instructed by
He called	
Ms Helen Fielding	Housing Manager, Hambleton District Council
Mr Phillip R Lee,	District Valuer Services
BSc, FRICS	
Mr Johnathan	Major Developments Officer, Hambleton District
Saddington BA (Hons),	Council
PgDipTP, MRTPI	

### FOR THE APPELLANT:

John Hunter QC	Instructed by Nathaniel Litchfield and Partners
He called	
Mr Richard Shield RICS	Director, DTZ
Mr Neil Morton,	Nathaniel Litchfield and Partners
MTP, MRTPI	

### INTERESTED PERSONS:

Councillor B Griffiths	Ward member
Ms E Driver	Local resident
Mr M Smallwood	Local resident
Mr M Canavan	Local resident
Councillor Andy Wake	Stokesley Parish Council
Kamran Hyder	Solicitor to Appellant

### DOCUMENTS

Document	1	Planning Obligation (15% affordable housing)
Document	2	Planning Obligation (20% affordable housing)
Document	3	Submission on confidentiality, GC
Document	4	Appendices PRL15 and 16 to Mr Lee's Rebuttal Proof
Document	5	Letter from E Yuill to NM dated 26 April 2013
Document	6	Stokesley Area Forum report 27 October 2008
Document	7	Revised list of suggested conditions
Document	8	Certificates of title (x 3) February/March 2013
Document	9	Office copies Register of title (x 3) as at 1 May 2013

### **Annex 1: conditions**

- 1) Details of the access, appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins. Development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.
- 3) The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.
- 4) Development shall not begin until details of the junction between the proposed service road and the highway have been submitted to and approved in writing by the local planning authority; and no building shall be occupied until that junction has been constructed in accordance with the approved details.
- 5) Before the development begins a scheme (including a timetable for implementation) to secure at least 10% of the energy supply of the development from decentralised and renewable or low carbon energy sources shall be submitted to and approved in writing by the Local Planning Authority as part of the reserved matters submissions required by condition 1. The approved scheme shall be implemented and retained as operational thereafter.
- 6) No building shall be occupied until a Travel Plan has been submitted to, and approved in writing by, the local planning authority. The Travel Plan, which shall include measures for its implementation and monitoring, shall be operated in accordance with the approved details.
- 7) Development shall not begin until a surface water drainage scheme for the site based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development has been submitted to and approved in writing by the local planning authority. No building shall be occupied until the scheme has been implemented in accordance with a schedule of works to be agreed with the local planning authority. The scheme shall provide a management and maintenance plan for the lifetime of the development.
- 8) Development shall not begin until details of the proposed means of disposal of foul drainage have been submitted to and approved in writing by the local planning authority. Development shall be carried out as approved before any of the buildings are brought into use.
- 9) No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period and shall provide for:
  - i) the parking of vehicles of site operatives and visitors
  - ii) loading and unloading of plant and materials
  - iii) storage of plant and materials used in constructing the development
  - iv) wheel washing facilities.