

APPLICATION NO:	20/00544/FUL
LOCATION:	Former ATS Building, Tanhouse Lane, Widnes, WA8 0RR.
PROPOSAL:	Proposed conversion and extension of the former tyre depot for re-use as a self-storage facility, self-contained offices, counter and business units including two new mezzanine floors within the warehouse.
WARD:	Halton View
PARISH:	None
APPLICANT:	The Storage Team Limited
AGENT:	Owen Ellis Architects, Honeycomb, Edmund Street, Liverpool, L3 9NG
DEVELOPMENT PLAN: Halton Unitary Development Plan (2005) Halton Core Strategy (2013) Joint Merseyside and Halton Waste Local Plan (2013)	ALLOCATIONS: Primarily Employment Area – Unitary Development Plan Proposals Map.
DEPARTURE	No.
REPRESENTATIONS:	One representation received from the publicity given to the application.
KEY ISSUES:	Development in a Primarily Employment Area, Highways and Transportation, External Appearance.
RECOMMENDATION:	Grant planning permission subject to conditions
SITE MAP	



1. APPLICATION SITE

1.1 The Site

The site subject of the application is the Former ATS building located on Tan House Lane in Widnes. The site is located on the junction of Fiddlers Ferry Road which is a main route through the borough.

The site is located in the Primarily Employment Area as designated by the Halton Unitary Development Plan.

The area on the South Eastern side of Fiddlers Ferry Road where the application site is located is predominantly commercial in nature.

The Council submitted the Submission Delivery and Allocations Local Plan to the Planning Inspectorate (DALP) for independent examination on 5th March 2020. This will replace the existing Unitary Development Plan Proposals Map in due course. This proposes to designate the site as Primarily Employment. This is now a material planning consideration, however at this point carries little weight in the determination of this planning application.

1.2 Planning History

The site has no recent relevant planning history.

2. **THE APPLICATION**

2.1 The Proposal

The application proposes the conversion and extension of the former tyre depot for re-use as a self-storage facility, self-contained offices, counter and business units.

2.2 Documentation

The application is accompanied by the associated plans (all viewable through the Council's website) in addition to a Design and Access Statement and a Phase 1 Desk Study.

3. **POLICY CONTEXT**

Members are reminded that planning law requires for development proposals to be determined in accordance with the development plan, unless material considerations indicate otherwise.

THE DEVELOPMENT PLAN

3.1 Halton Unitary Development Plan (UDP) (2005)

The site is designated as a Primarily Employment Area on the Halton Unitary Development Plan Proposals Map.

The following policies within the adopted Unitary Development Plan are considered to be of particular relevance;

- BE1 General Requirements for Development;
- BE2 Quality of Design;
- E3 Primarily Employment Areas;
- E5 New Industrial and Commercial Development;
- GE21 Species Protection;
- GE27 Protection of Trees and Woodland;
- PR14 Contaminated Land;
- PR16 Development and Flood Risk;
- TP1 Public Transport Provision as Part of New Development;
- TP6 Cycle Provision as Part of New Development;
- TP7 Pedestrian Provision as Part of New Development;

- TP12 Car Parking;
- TP17 Safe Travel For All.

3.2 Halton Core Strategy (2013)

The following policies, contained within the Core Strategy are of particular relevance:

- CS1 Halton's Spatial Strategy;
- CS2 Presumption in Favour of Sustainable Development;
- CS4 Employment Land Supply and Locational Priorities;
- CS18 High Quality Design;
- CS19 Sustainable Development and Climate Change;
- CS20 Natural and Historic Environment;
- CS23 Managing Pollution and Risk;
- CS24 Waste.

3.3 Joint Merseyside and Halton Waste Local Plan (2013)

The following policies, contained within the Joint Merseyside and Halton Waste Local Plan are of relevance:

- WM8 Waste Prevention and Resource Management;
- WM9 Sustainable Waste Management Design and Layout of New Development.

MATERIAL CONSIDERATIONS

Below are material considerations relevant to the determination of this planning application.

3.4 Halton Borough Council – Design of New Commercial and Industrial Development Supplementary Planning Document.

The purpose of this Supplementary Planning Document (SPD) is to complement the Halton Unitary Development Plan (UDP), to provide additional practical guidance and support for those involved in the planning of new development within Halton Borough to: -

- a. Design new industrial and commercial developments that relate well and make a positive contribution to their local environment;
- b. Seek the use of quality materials which respond to the character and identity of their surroundings and reduce environmental impact such as through energy efficiency; and
- c. Create better, more sustainable places

3.5 National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published in February 2019 to set out the Government's planning policies for England and how these should be applied.

Achieving Sustainable Development

Paragraph 7 of the NPPF states that *the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.*

Paragraph 8 states that *achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

Paragraph 9 states that *these objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*

Paragraph 10 states so that *sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. As set out in paragraph 11 below:*

The Presumption in Favour of Sustainable Development

Paragraph 11 states that *for decision-taking this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Decision-making

Paragraph 38 states that *local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*

Determining Applications

Paragraph 47 states that *planning law requires for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on application should be made as quickly as possible and within statutory timescale unless a longer period has been agreed by the applicant in writing.*

3.6 Other Considerations

The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a persons rights to the peaceful enjoyment of property and Article 8 of the Convention of the same Act which sets out his/her rights in respect for private and family life and for the home. Officers consider that the proposed development would not be contrary to the provisions of the above Articles in respect of the human rights of surrounding residents/occupiers.

4. CONSULTATIONS SUMMARY – FULL RESPONSES CAN BE LOCATED AT APPENDIX 1.

Highways and Transportation Development Control – No objection.

Contaminated Land Officer – No objection.

Lead Local Flood Authority – Objection raised.

Regeneration – No objection.

Natural England – No objection.

5. REPRESENTATIONS

5.1 The application was advertised by a press advert in the Widnes and Runcorn Weekly News on 13/05/2021, two site notices posted on 15/10/2020 and eighty-three neighbour notification letters sent on 15/10/2020.

5.2 One representation has been received from the publicity given to the application. The following issues have been raised:

- The proposal would invade privacy;
- There are plenty of storage facilities in the town and it should be converted into something the town needs.

6. ASSESSMENT

6.1 Principle of Development

The site is designated as a Primarily Employment Area on the Halton Unitary Development Plan Proposals Map. The application proposes the conversion and extension of the former tyre depot for re-use as a self-storage facility, self-contained offices, counter and business units.

Policy E3 of the Halton Unitary Development Plan states that development falling within Use Classes B1 (Business), B2 (Storage and Distribution), B8 (Storage and Distribution) and Sui Generis industrial uses will be permitted in a Primarily Employment Area.

The application form sets out that the resultant floorspace from the proposed conversion and extension would be used for the following purposes:

Use Class B2 – General Industrial 357sqm

Use Class B8 - Storage or Distribution 996sqm – Ground Floor, 1684sqm – First Floor and 1701sqm – Second Floor – Totalling 4381sqm.

Use Class E(c) – Office 126sqm

Use Class E(a) - Display or retail sale of goods, other than hot food 121.7sqm

The principle of both Use Class B2 and Use Class B8 in this location is therefore acceptable. The one representation received states that there are plenty of storage facilities in the town. A storage use is considered an acceptable use in this area and a refusal on the basis that there are already plenty of storage facilities in the town cannot be sustained.

The use of small parts of the building for both Use Class E(c) and Use Class E(a) are considered to be ancillary to the overall operation of the site and acceptable in an Employment Area.

It is considered that a subsequent planning permission should be restricted to the uses applied for to ensure that the site remains sympathetic to the surrounding area.

Based on the above, the principle of development is considered to be acceptable in compliance with Policy E3 of the Halton Unitary Development Plan.

6.2 Highways and Transportation

The Highway Officer notes that the uses proposed for the reconfigured/extended building are in keeping with the surrounding commercial area.

In relation to access, the existing unit is well established with vehicular access provided off Aston Lane.

The Highway Officer noted that there was scope to improve the pedestrian access to the site given the site's relationship to the adopted highway and this provision could be secured by condition. The applicant has now updated the proposed site layout

plan to show such provision. A condition would secure the implementation of the pedestrian link and its maintenance thereafter.

In terms of trip generation the local network is considered appropriate for the scale of development and the Highway Officer raises no concerns regarding impact on the operational capacity of the surrounding network.

There are adopted footways to Tan House Lane and with uncontrolled crossing points to onward links. The site is considered sustainable in terms of access to bus services.

The Highway Officer does have some residual concerns over the suitability of the proposal due to the size of the extension and proposed car parking layout, however does not raise an objection to the proposal noting that the applicant would have a more in depth understanding with regards to the servicing requirement for the proposed unit.

The proposed car parking levels are considered to be appropriate for the scale and use and note that provision has been made for disabled bays. A condition would secure the implementation of the parking and servicing areas and maintenance thereafter.

It is noted that cycle storage should be provided in an accessible overlooked location and be of a type that will accommodate for anticipated dwell times. Further details on this have now been provided by the applicant which show an appropriate level of covered provision in a visible location. A condition would secure the implementation of the cycle storage and its maintenance thereafter.

From a highway perspective, the attachment of the suggested conditions would ensure that the proposal is considered to be compliant with Policies BE1, TP1, TP6, TP7, TP12 and TP17 of the Halton Unitary Development Plan.

6.3 Site Layout and External Appearance

The reconfigured and extended building would result in additions to both the North West and south east of the existing building. The addition to the south east is modest in dimension and would not be highly visible due to its location. The addition to the North West would extend towards Fiddlers Ferry Road which is a main route through the borough. This would increase the prominence of the site somewhat. In an attempt to ensure satisfactory appearance on this prominent corner plot, the applicant has introduced a large amount of glazing as well as different cladding to make a feature of this element of the building. This approach is accepted.

It is noted that the proposal would result in the loss of one tree located on the Fiddlers Ferry Road boundary to facilitate the proposed extension, however the proposal seeks to retain other trees located on the site which are adjacent to Tan House Lane / south eastern corner of the site. It is not considered that the refusal of the application based on the loss of the one tree located on the Fiddlers Ferry Road boundary especially given the strong tree line which exists along the road. Based on the site

layout, there is limited scope for additional soft landscaping however it is considered reasonable to attach a condition securing the implementation of an appropriate boundary treatments scheme along with a condition securing tree protection measures for the trees to be retained during construction works at the site. In relation to tree works, it is considered reasonable to attach a condition ensuring protection for breeding birds.

The one representation received raised concerns that the proposed development would invade privacy. It is considered that the proposed building is sufficiently distant from neighbouring buildings to ensure that light and privacy are not unduly compromised.

In respect of layout and external appearance the proposal is considered to be compliant with Policies BE1, BE2, E5 and GE27 of the Halton Unitary Development Plan.

6.4 Flood Risk and Drainage

The site subject of the application is located in Flood Zone 1 and is less than 1ha in area. The site is not located in a Critical Drainage Area. Based on this, a Flood Risk Assessment is not required to accompany the application.

In relation to drainage, the Lead Local Flood Authority objected to the application on the basis that no information on flood risk or drainage has been provided to accompany the application. The applicant has now submitted existing and proposed drainage plans to accompany the application. Further observations from the Lead Local Flood Authority have not been received at the time of writing this report.

It is considered that the attachment of a condition securing the implementation, maintenance and management of the sustainable drainage scheme would ensure that the proposal is acceptable in terms of flood risk and drainage in compliance with Policy PR16 of the Halton Unitary Development Plan, Policy CS23 of the Halton Core Strategy Local Plan and the National Planning Policy Framework.

6.5 Ground Contamination

On original submission, the Contaminated Land Officer noted that the risks for the site in terms of the proposals and the historical use are low, but had advised that there should be a preliminary risk assessment (including a site recon) to clarify the situation. The applicant has submitted a Phase 1 Desk Study which provides an assessment in relation to ground contamination which advises that:

A Phase 2 Intrusive Investigation will be required to gather information on:

- The degree of contamination of the made ground.*
- Geotechnical properties of the underlying superficial deposits.*

It is considered that this can be secured by appropriately worded planning condition. The attachment of the suggested condition would ensure that the proposal is compliant with Policy PR14 of the Halton Unitary Development Plan and Policy CS23 of the Halton Core Strategy Local Plan.

6.6 Sustainable Development and Climate Change

Policy CS19 of the Halton Core Strategy Local Plan outlines some principles which will be used to guide future development in relation to sustainable development and climate change.

NPPF is supportive of the enhancement of opportunities for sustainable development and it is considered that any future developments should be located and designed where practical to incorporate facilities for charging plug-in and other ultra-low emission vehicles.

The incorporation of facilities for charging plug-in and other ultra-low emission vehicles for this development is considered reasonable. The scheme now presented by the applicant which includes two floor fastened electric vehicle charging points which serve four of the parking bays is considered acceptable. The implementation and maintenance of this provision should be secured by condition.

Based on the above, the proposal is considered compliant with Policy CS19 of the Halton Core Strategy Local Plan.

6.7 Waste Management

Policies WM8 and WM9 of the Joint Merseyside and Halton Waste Local Plan are applicable to this application along with policy CS24 of the Halton Core Strategy Local Plan. In terms of waste prevention, construction management by the applicant will deal with issues of this nature. It is considered reasonable to attach a condition ensuring that a waste audit for the site is submitted prior the first occupation of the reconfigured and extended building.

In terms of on-going waste management, the proposed layout ensures that sufficient space is available for such provision.

The proposal is considered to be compliant with policies WM8 and WM9 of the Joint Merseyside and Halton Waste Local Plan and policy CS24 of the Halton Core Strategy Local Plan.

6.8 Planning Balance

There is a presumption in favour of granting sustainable developments set out in NPPF where the proposal is in accordance with an up-to-date development plan. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

It is considered that the development plan policies referenced are in general conformity with the NPPF, therefore up-to-date and full weight should be given to these.

The proposal would convert and extend this existing vacant building in a manner which would be sympathetic to surrounding land uses and accords with the policy requirements for the site's location within a Primarily Employment Area as well as securing potential future jobs for the Borough. It is considered that the proposal is acceptable for the reasons set out in the report and that this proposal represents sustainable development which is in accordance with an up-to-date development plan.

7. CONCLUSIONS

The proposal would convert and extend this existing vacant building in a manner which would be sympathetic to surrounding land uses and accords with the policy requirements for the site's location within a Primarily Employment Area.

The site is served by a well-established access point from Aston Lane which is considered acceptable. The layout demonstrates an appropriate level of car parking for the use/amount of development proposed. Suitable pedestrian links and cycle parking provision can be achieved to serve the proposed development via the conditions suggested.

The proposal would increase the prominence of the site on the corner of Tanhouse Lane and Fiddlers Ferry Road, however the applicant ensures satisfactory appearance through the introduction of a large amount of glazing as well as different cladding to make a feature of this element of the building. The overall proposal is considered to be a well-designed development reflecting its location within this commercial location.

The proposal is therefore considered to be acceptable.

8. RECOMMENDATION

Grant planning permission subject to conditions.

9. CONDITIONS

1. Time Limit – Full Permission.
2. Approved Plans.
3. Restriction on Use.
4. External Facing Materials (Policies BE1 and BE2)
5. Boundary Treatments Scheme (Policy BE1)

6. Parking and Servicing – (Policy BE1)
7. Electric Vehicle Charging Point Scheme – (Policy CS19)
8. Cycle Parking – (Policies BE1 and TP6)
9. Pedestrian Improvement Scheme – (Policies BE1 and TP7)
10. Tree Protection Measures – (Policy GE27)
11. Breeding Birds Protection – (Policies GE21 and CS20)
12. Ground Contamination – (Policies PR14 and CS23)
13. Drainage Strategy – (Policies PR16 and CS23)
14. Foul and Surface Water on a separate system – (Policies PR16 and CS23)
15. Waste Audit – (Policy WM8)

10. BACKGROUND PAPERS

The submitted planning applications are background papers to the report. Other background papers specifically mentioned and listed within the report are open to inspection by contacting dev.control@halton.gov.uk

11. SUSTAINABILITY STATEMENT

As required by:

- The National Planning Policy Framework (2019);
- The Town and Country Planning (Development Management Procedure) (England) Order 2015; and
- The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015.

This statement confirms that the local planning authority has worked proactively with the applicant to secure developments that improve the economic, social and environmental conditions of Halton.

APPENDIX 1 - Full Consultation Responses.

1. Highways and Transportation Development Control.

In general the end use is considered to be a suitable and in keeping with the surrounding commercial area.

There are however some points we would raise that may require amendments to plans or suitably worded conditions.

Access

The existing unit is well established and takes access off Tan House Lane via Aston Lane (which is an unadopted private street) vehicular access is therefore appropriate but it is unclear how non-motorised users gain access to the site?

We would ask for clarification on pedestrian access to ensure compliance with policy TP8 point 1.

Note the red line plan shown on the submitted plan appears to abut highway verge therefore pedestrian access could be provided via a new pedestrian link connecting to existing footway. This would require the agreement of the Highway Authority and works carried out via a suitable licence.



In terms of trip generation the local network is considered appropriate for the scale of development and the Highway Officer raises no concerns regarding impact on the operational capacity of the surrounding network.

Sustainable modes of travel

There are adopted footways to Tan House Lane and with uncontrolled crossing points to onward links.

The site is considered to meet the requirements set out in TP1 of the UDP and therefore the site is considered sustainable in terms of access to bus services.

Servicing

We acknowledge that the applicant will have a more in depth understanding with regards to the servicing requirement for the proposed unit but the Highway Authority do have some residual concerns over the suitability of the proposal due to the size of the extension and proposed car parking layout.

The plans show a turning circle for an articulated vehicle to the South of the unit which relies on parking spaces being clear, although this is potentially controllable it would not suit other uses within the class that required a higher level of servicing.

In terms of servicing the statement mentioned smaller lorries but no tracking details are shown for how these vehicles will access and service the site, in particular the access doors to the Western elevation.

Additionally the turning circle (shown below) potentially conflicts with kerbing, the demarcation shown on the plans may however not involve vertical faces.



Car Parking

The proposed car parking levels are considered to be appropriate for the scale and use and we note that provision has been made for disabled bays

We would recommend that the area of landscaping shown below be reviewed to improve accessibility of the adjacent car parking bay.

Additionally the disabled bay shown on the plan extract below should have hatching to both side or be adjacent to a paved pedestrian area.



EV charging provision should be included in the proposed car parking provision and for a scheme of this size we would recommend 2 number bays be provided prior to the unit being brought into use and a further 2 bays be first fixed to futureproof for increased demand. A suitably worded condition is considered appropriate.

Cycle provision

Cycle storage should be provided in an accessible overlooked location and be of a type that will accommodate for anticipated dwell times.

In terms of level of provision the number of stands shown on the plans is considered acceptable as is the location, near the foyer but as referenced above it is not clear how non-motorised users (which should include cyclists) access the site.

We would recommend that a covered element be included to accommodate longer dwell times.

A condition could be applied to submit full details for approval post decision.

2. Contaminated Land Officer.

I've had some recent discussions with a consultancy undertaking a desk study for that site, so I presume there will be some information available. The risks for the site in terms of the proposals and the historical use are low, but I think there should at least be a preliminary risk assessment (including a site recon) to clarify the situation for the purposes of the planning decision. In terms of wording for a condition, it probably should be the full contaminated land one, as just conditioning a preliminary assessment means there's no control on actual site works if the initial review deems it necessary.

3. Lead Local Flood Authority

After reviewing 20/00544/FUL planning application, the LLFA has found the following:

- The site is approximately 0.4ha in size and is a brownfield site comprising an existing industrial building and car parking area.
- The proposed development is classed as 'Less vulnerable', according to the Table 2 of the Planning Practice Guidance: Flood Risk and Coastal Change (paragraph 066). The proposed development may increase the total impermeable area of the site.
- Review of flood risk at the location for the proposed development found that the site is located within Flood Zone 1, at very low surface water flood risk and outside of the extents of reservoir flooding.
- The Halton Borough Council *Strategic Flood Risk Assessment* shows the site is not located within a Critical Drainage Area.
- Review of watercourses in the area found the following:
 - o The closest watercourse is an unnamed drain, located approximately 50m north east of the site, along Fiddlers Ferry Road;
 - o The St Helens Canal is located approximately 670m south of the site; and
 - o River Mersey is located approximately 900m south of the site, further south of the Canal.
- The applicant has provided the following relevant documents:
 - o *Design & Access Statement*, prepared by Owen Ellis Architects, reference 4180N01H, dated 02.10.2020;
 - o *Existing Site Plan* drawing, prepared by Owen Ellis Architects, number 4180/SK01, dated 02.10.2020; and
 - o *Proposed Site Plan* drawing, prepared by Owen Ellis Architects, number 4180/SK04, dated 06.10.2020.
- No information on flood risk or proposed surface water drainage has been provided.

Based on the above, the LLFA considers the applicant has not adequately assessed the site with regards to the drainage hierarchy.

The LLFA would require the following information to be provided, in a form of a drainage strategy:

- Proposed surface water discharge point, following the hierarchy of preference (as per the *Planning Practice Guidance*): infiltration, watercourse, surface water sewer, combined sewer. Infiltration tests would be required to demonstrate whether soakaway is feasible. It should be noted that United Utilities also apply this strictly, and detailed consideration of the hierarchy will need to be demonstrated in supporting documentation.
- Proposed discharge rate - appropriate discharge rates should be calculated for 1, 30 and 100yr flood events for use in drainage design. In line with NPPF this should be attenuated to Greenfield rates for greenfield sites/site area, and as close as possible to greenfield rates for brownfield areas. Climate change should be considered appropriately.
- Proposed drainage layout, indicating runoff areas and calculations provided including attenuation. Interceptors/filtration may also be deemed appropriate in accordance with SUDS hierarchy/guidance.
- Details of the implementation, maintenance and management of the sustainable drainage (SuDS) scheme for the disposal of surface water in accordance with the SuDS hierarchy. This should be reported within the Drainage Strategy, this should include the following details:
 - o A management and maintenance plan for the lifetime of the development which shall include the arrangements for i) drainage to soakaway, including calculations and arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime or ii) if i) not feasible connection to any system adopted by, any public body or statutory undertaker.
 - o Interceptors, attenuation structures and calculations to demonstrate a reduction in surface water runoff rate to greenfield runoff rates for the new hardstanding areas as a minimum, with additional improvements for existing runoff where practical. Calculation should demonstrate no flooding to buildings in the NPPF design event (1 in 100 year + 40% climate change allowance).

The LLFA recognise that the applicant may wish to utilise the existing surface water drainage system. If that is the case, the LLFA require the applicant to provide information on the existing discharge point and rate, and assessment of change of impermeable areas due to the proposed changes, and their impact on the existing system.

The applicant has not provided sufficient details for the LLFA to make an informed decision on this planning application. The LLFA would therefore object to the application as proposed and would recommend the applicant provides the information and documents detailed above.

4. Regeneration.

My main comment is that due to its prominent location on the roundabout which is the entrance to the north to the HH office and the new residential development and

also potentially to residential to the south it needs to be visually to a high standard with well-maintained landscaping and perimeter fencing.

5. Natural England.

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>