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Report of the Chief Planning Officer

SOUTH & WEST PLANS PANEL

Date: 7th March 2024

Subject: 23/06663/FU – Erection of 82 affordable dwellings and associated open space and infrastructure at Former Hough Side High School Site, Hough Top, Swinnow, Leeds, LS13.

APPLICANT
Leeds City Council

DATE VALID
17.11.2023

TARGET DATE
05.04.2024

Electoral Wards Affected:

Pudsey

Yes Ward Members consulted

Specific Implications For:

Equality and Diversity

Community Cohesion

Narrowing the Gap

POSITION STATEMENT: Members are requested to note the contents of this report on the proposal and to provide views in relation to the questions posed to aid the progression of the application.

INTRODUCTION:

- The application is presented to South and West Plans Panel. This report is a Position Statement meaning that the application is not being reported for determination at this point in time. The purpose of this Position Statement is to inform Members of the proposal, to report on the progress of the application and to seek Members comments on key planning issues associated with this development.

PROPOSAL:

2. The proposal is for a new residential development comprising 82 affordable rent dwellings with associated parking and amenity space; construction of new adoptable highway, and public open space.

The proposed development consists of the following:

- 28 – Two-bedroom, four person houses
- 23 – Three-bedroom, five person houses
- 4 – Four-bedroom, 7 person houses,
- 17 – One-bedroom, 2 person apartments,
- 10 – Two-bedroom, 3 person apartments.

SITE AND SURROUNDINGS

3. The site comprises a 2.5 Ha area of land to the north of Hough Top road. The site was formerly occupied by a school until 1992, and then used as Council offices. The building was demolished in 2021/2022.
4. The site slopes gently from the west to the east and comprises a mix of grassland and hardstanding. Boundaries are mature trees, particularly to the eastern and southern boundaries, hedgerows and scrub. An access point remains from Harley Drive and the former access from Hough Top Road is closed off.
5. The site is surrounded by residential properties to the north, east and south. Properties are red brick houses to the north, stone houses to the south and 3 storey brick and red flats to the east. To the west are playing fields. To the north east corner is the vacant Swinnow Public House.
6. The application site is an allocated housing site in the Local Development Framework Site Allocation Plan (2019) with a suggested site capacity of 76 units. Site Allocations reference HG2-207. The Site Requirements indicate that the site is affected by a gas main along the south of the site.

RELEVANT PLANNING HISTORY:

7. Planning applications:
21/00510/DEM: Determination for demolition of former school building.
Approved 17.08.2021

Pre-application enquiries:

Erection of 82 affordable dwellings and associated open space. Advice given 14.03.2023.

CONSULTATION RESPONSES:

8. LCC Environmental Studies Transport Strategy:
This team was consulted on this application due to its proximity to the transportation network. On examination of Defra's strategic noise maps and the layout and orientation of the proposed dwellings, transportation noise is unlikely to be of a level that would require specific

measures over and above standard building elements. Therefore in this case we do not require an acoustic assessment to be submitted.

9. LCC Environmental Health Services

No objection subject to conditions. Noisy construction related activities should not take place outside the hours of 08.00 to 18.00 hours Mondays to Fridays 09.00 to 13.00 hours, Saturdays with no noisy activities on Sundays or Public Holidays.

10. Health and Safety Executive

No objection.

11. Refuse Collection Services

No objection.

12. The Coal Authority

No objection.

13. Northern Gas Networks

No objection.

14. LCC Flood Risk Management

Infiltration strategy is supported, however the submitted 'Overland Flow Assessment' drawing appears to indicate discharge of surface water onto the highway and Hough Top. Revised information required.

15. LCC Contaminated Land Team

No objection, subject to conditions.

16. Yorkshire Water

The submitted Flood Risk Assessment and Drainage Strategy requires amendments so no surface water discharges to YW sewers. This can be deal with via condition.

17. West Yorkshire Police

No objection.

18. LCC Design Team

Objection: A number of issues need to be addressed before the proposals can be supported from a design perspective: elevations, windows, boundary treatments.

19. LCC Landscape Team

Queries over exact number of trees to be lost and replaced. Tree Survey and AIA require updating. Some concerns over retaining wall details, further detail requested.

20. LCC Nature Team

Objection to the -23% biodiversity net loss, contrary to local policy.

PUBLIC/LOCAL RESPONSE:

21. The application was advertised as a major development. Site notices were posted around the site on 24.11.2023 and the application was publicised in the Yorkshire Evening Post on 05.12.2023.

22. General Comments:

7 neutral comments, 2 were from the same household, summarised below:

- Queries as to purpose of railings and chicanes around the POS.
- How will the grass verge area be maintained?
- Request for 1 Swift brick per house as per the British Standard
- Harley Drive is a narrow street, cars regularly hit each other. Harley Drive needs widening, more cars in the area will make this worse.
- Football field must be safeguarded from future development.
- Not against housing here but there should be an access from Harley Drive.

23. Comments in Support:

5 comments, summarised below:

- Support on the condition of detailed specification for how the project will meet its renewable energy commitments
- Fully support this development in the years of the major housing crisis, and the money it will bring into the local economy.
- Great use of unused land, mix of housing is diverse and will provide much needed housing.
- Could the development promote healthy lifestyles by including a kid's playing area, car-free walking routes to Pudsey/bus stops, a shop or community hub.
- Support provision of much needed affordable housing. But the appearance of the houses have little architectural character. Recommend more new trees to soften the streetscape and provide wind and sun mitigation.
- Concerns over ground floor layout with WC straight off the kitchen space.
- Lack of affordable social housing in the local area, there is a lot of demand in Pudsey and Bramley.

24. Comments in Objection:

43 objection comments. Of these some were multiple concerns raised by the same objector. Concerns are summarised below:

- Significant impact to road safety; there are already issues with school drop-offs and weekend football parking along Hough Top.
- Development will destroy trees and wildlife
- Parking will get worse, there are already parking issues with the nearby school and adjacent playing fields during football matches.
- Hough Top already used as a rat run, this development will increase traffic congestion
- Development will exacerbate the existing issue with cars parking on Hough Top during football matches. The Harley Walk Parking Project will not fully address this issue.
- Considerable crime and ASB in the area. This has not been given sufficient consideration in the design of boundary treatments or the Public Open Space or play area.
- Proposed boundary railings along Hough Top will make the grass verges inaccessible to dog walkers.
- Too many footpaths and vehicular access points proposed into the site. It is too permeable against crime and ASB deterrent policy.
- Play area is too close to the road and will attract older children and antisocial behaviour.
- Noise from the playing field during football matches will be intrusive to future occupants of the houses adjacent to the field.

- Overlooking into rear gardens from the playing field.
- Site too dense, no public transport near the development, traffic will become much worse.
- To many Council properties in the area already. Will place more demand on local health services, more traffic and more antisocial behaviour.
- Scheme is unimaginative, needs differing house types
- Development will have an oppressive impact on the surrounding area
- Site should be used for community allotments and trees
- Swinnow Lane and Hough Top cannot maintain 2 way traffic already.
- Concerns over flooding and sewage, no street drains on Hough Top.
- Transport Assessment conclusion based on flawed arguments
- Proposed boundary treatments conflicting
- Pre-planning consultation process was inadequate should have had a public meeting
- Should have 2 smaller apartment blocks, proposed block is too high.
- Flat height and siting is overbearing, overshadowing, and out of character. Will devalue nearby homes and increase noise and traffic.
- Block of flats is ugly, red brick is out of character.
- Houses should be in character with Hough Top, not Swinnow Estate
- Need to use Harley Drive as an access point. Fire Tender cannot pass through Hough Top during football match days.
- Increased air pollution from traffic and the homes
- Proposed substation should be re-sited well away from houses.

25. Ward Members: Objection from Cllr S Seary in support of residents. Introducing access from Harley Drive would alleviate the concerns of 2 access points along Hough Top.

PLANNING POLICIES:

LOCAL PLANNING POLICY AND GUIDANCE

The Development Plan

26. As required by Section 38(6) of the Planning and Compulsory Purchase Act 2004 this application has to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan currently comprises the adopted Local Development Framework Core Strategy (2019), those policies saved from the Leeds Unitary Development Plan (Review 2006), the Site Allocations Plan (2019), the Natural Resources and Waste Development Plan Document (2013 and 2015) and any made Neighbourhood Plan.
27. The following policies from the Core Strategy are considered to be of most relevance to this development proposal:

General Policy: Sustainable Development and the NPPF

Spatial Policy 1: Location of Development

Spatial Policy 6: The Housing Requirement and allocation of housing land

H1: Managed release of sites

H3: Density of residential development

H4: Housing mix
 H5: Affordable housing
 H9: Minimum space standards
 H10: Accessible dwellings
 P10: Design
 P12: Townscapes/landscapes
 T1: Transport Management
 T2: Accessibility requirements and new development
 G1: Enhance and extend green infrastructure
 G2: Increase native and appropriate tree cover
 G4: Green Space improvement and new green space provision
 G8: Protection of important species and habitats
 G9: Biodiversity Improvements
 EN1: Climate change – Carbon Dioxide Reduction
 EN2: Sustainable Design and Construction
 EN5: Managing flood risk
 EN8: Electric Vehicle Charging Infrastructure:
 ID2: Planning obligations

28. The following saved policies from the Unitary Development Plan are considered to be of most relevance to this development proposal:

GP5: Seeks to ensure that development proposals resolve detailed planning considerations, including amenity.
 BD2: New buildings should complement and enhance existing skylines
 BD5: Amenity and new buildings.
 N23: Open space and retention of existing positive features
 N25: Development and Site Boundaries
 LD1: Landscaping schemes

29. The following policies from the Natural Resources and Waste Local DPD are considered to be of most relevance to this development proposal:

General Policy 1: General planning considerations
 Water 1: Water efficiency
 Water 6: Flood risk assessments
 Water 7: Surface water run-off
 Land 1: Contaminated Land
 Land 2: Development and trees
 AIR1: Air quality initiatives

Relevant Local Supplementary Planning Guidance/Documents

30. The most relevant local supplementary planning guidance (SPG), supplementary planning documents (SPD) are outlined below:

Neighbourhoods for Living (and associated addendum) (2003)
 Transport SPD (2023)
 Sustainable Design and Construction SPD (2011)
 Distances from Development to Trees (SPG13)
 Sustainable Urban Drainage (SPG22)
 Accessible Leeds SPD (2016)

NATIONAL PLANNING POLICY AND GUIDANCE

National Planning Policy Framework

31. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system. The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.
32. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise (section 38(6) Planning and Compulsory Purchase Act 2004). The National Planning Policy Framework is an important material consideration in planning decisions.
33. The policy guidance in Annex 1 to the NPPF is that due weight should be given to relevant policies in existing plans according to their degree of consistency with the NPPF. The closer the policies in the plan to the policies in the Framework, the greater the weight that may be given. It is considered that the local planning policies mentioned above are consistent with the wider aims of the NPPF.

National Planning Practice Guidance

34. The Planning Practice Guidance (PPG) provides commentary on the application of policies within the NPPF. The PPG also provides guidance in relation to the imposition of planning conditions. It sets out that conditions should only be imposed where they are necessary; relevant to planning and to the development to be permitted; enforceable; precise and reasonable in all other respects.

CLIMATE EMERGENCY:

35. The Council declared a climate emergency on the 27th March 2019 in response to the UN's report on Climate Change.
36. The Planning Act 2008, alongside the Climate Change Act 2008, sets out that climate mitigation and adaptation are central principles of plan-making. The NPPF makes clear that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions in line with the objectives of the Climate Change Act 2008.
37. As part of the Council's Best City Ambition, the Council seeks to deliver a low-carbon and affordable transport network, as well as protecting nature and enhancing habitats for wildlife. The Council's Development Plan includes a number of planning policies which seek to meet this aim, as does the NPPF. These are material planning considerations in determining planning applications.

PUBLIC SECTOR EQUALITY DUTY:

38. The Equality Act 2010 requires local authorities to comply with the Public Sector Equality Duty. Taking into account all known factors and considerations, the requirement to consider, and have due regard to, the needs of diverse groups to eliminate discrimination, advance equality of opportunity and access, and foster good relations between different groups in the community has been fully taken into account in the consideration of the planning application to date and at the time of making the recommendation in this report.
39. In this instance it is considered that the proposals do not raise any specific implications in these respects and therefore it is not considered that a full Equality, Diversity, Cohesion and Integration Impact Assessment (EDCI) is required.

40. **MAIN ISSUES:**

This Position Statement will focus on the main planning issues. Other issues such as land contamination and drainage will be covered in the final report but are not considered key areas of concerns in relation to this application. The main issues are:

- Principle of development
- Design and appearance
- Biodiversity and tree loss
- Highways and parking
- Drainage

APPRAISAL

Principle of development

41. The Site Allocations Plan (SAP) identifies the site as being allocated (reference HG2-207) for housing and is therefore supported in principle being a residential scheme.
42. Policy H3 of the Core Strategy states the required densities of residential development in order to ensure a sustainable housing development and the efficient use of land. Housing development in Leeds should therefore meet or exceed the identified net densities.
43. The site is located in ‘other urban areas’ and is therefore expected to have a dph of 40. The density of the site equates to 32.5 dwellings per hectare. Given the constrained nature of the site due to the existing mature trees and presence of a gas pipeline, this is considered an appropriate balance that exceeds the indicative site capacity of 76 dwellings in the SAP.
44. Policy H4 of the Core Strategy states that developments should include an appropriate mix of dwelling types and sizes to address the needs measured over the long-term taking into account the nature of the development and character of the location. The preferred housing mix is as set out below:

Type	Max %	Min %	Target %
Houses	90	50	75
Flats	50	10	25

Size			
1 bed	50	0	10
2 bed	80	30	50
3 bed	70	20	30
4 bed +	50	0	10

45. The development proposes a total of 55 dwellings and 27 apartments. This is an acceptable mix within the target ranges shown above. The split by size of properties proposed is as follows:
- 17 one-bedroom apartments (20%)
 - 38 two-bedroom houses/apartments (46%)
 - 23 three-bedroom houses (28%)
 - 4 four-bedroom houses (4.8%)
46. The mix proposed falls between the maximum and minimum targets as set out in the above table and is therefore considered to achieve an appropriate housing mix as required by Policy H4.
47. As this scheme represents 100% Affordable Housing, the 15% that would be required in AH Zone 2 is exceeded and the Local Planning Authority fully support the delivery of a 100% AH scheme.
48. Core Strategy Policy H10 requires that new build residential developments include the following proportions of accessible dwellings:
- 30% of dwellings meet the requirements of M4(2) ‘accessible and adaptable dwellings’ of Part M Volume 1 of the Building Regulations.
 - 2% of dwellings meet the requirement of M4(3) ‘wheelchair user dwellings’ of Part M volume 1 of the Building Regulations. Wheelchair user dwellings should meet the M4(3) wheelchair adaptable dwelling standard unless Leeds City Council is responsible for nominating a person to live in the dwelling.
49. The site plan confirms that 2 one-bedroom apartments (2%) will meet the requirements of M4(3) and 30% of properties will meet the requirements of M4(2). Housing Leeds have confirmed there is no demand for a family-sized M4(3) dwelling, so one bedroom M4(3) apartments have been accepted as most appropriate in this case. The M4(2) dwellings are a proportional mix of dwelling sizes and types.
50. For these reasons the development is considered acceptable in principle subject to all other material planning considerations.
51. Design and appearance
The National Planning Policy Framework states that “good design is indivisible from good planning” and authorities are encouraged to refuse “development of poor design”, and that which “fails to take the opportunities available for the improving the character and quality of an area and the way it functions, should not be accepted”. Policy P10 of the Core Strategy seeks to ensure that new development is of high quality and is appropriate to its context.
52. The layout of the proposed dwellings is generally acceptable and responds well to the existing topography and other site constraints such as the gas pipeline to the south.

Although the location of the public open space (POS) to the south is not ideal as it could limit usability, it does enable the retention of the mature trees which are a considerable asset to the site and locality. A total of 4,630 sqm of POS is proposed which exceeds policy requirements. The inclusion of a small trim trail play area as part of the POS will be a positive facility for families living on the site and nearby. The play area has been reduced in size in response to comments from Ward members and the public about the potential for antisocial behaviour.

53. The position of the flats adjacent to the open space is positive and there is good space about the block of flats to absorb their scale. The flats are 3 storey which is no higher than the existing blocks of flats to the east. Furthermore, the block of flats has been set at an angle and set well back from Hough Top to lesson the visual impact of the flats when viewed from Hough Top.
54. Houses are a mix of detached and semi-detached properties with private gardens of an acceptable size and in curtilage parking that does not dominate the streetscape. The initial proposal included several houses with blank gable elevations facing the street and on corners. This appears harsh and overbearing and it was requested that windows are added to these gable ends to improve the appearance of houses and also introduce some passive surveillance. A revised design for house type A1 has introduced a blind window at ground floor level. This does not resolve the original concerns raised.
55. The LCC Design officer commented that the original elevations of the apartment bloc were relatively featureless and austere. The revised drawings are little different to the previous versions. The introduction of panels of different brick work does not address the earlier fundamental problems of comparatively small windows. Whilst Building Regulations Part) was previously cited as the reason for relatively small windows, insufficient justification has been provided to support this position or the alternative approaches to ventilation. There remains an objection from the LCC Design officer in regard to the appearance of the flats, dwellings and proposed boundary treatments.
56. With regard to proposed boundary treatments, the objection relates to the proposed close boarded timber fence to the western rear boundary adjacent to the playing field. This will be sited behind the existing metal palisade fencing at this boundary. Where boundaries adjacent to open space are present, they should be of an appropriate quality. It is standard good practice to provide a robust, attractive and contextual boundary as referenced in Saved UDP Policy N25.
57. The proposed western boundary treatment would be in conflict with saved policy N25. However, cross sections have been provided to show that the land slopes up higher on the open space side which will obscure much of this boundary from public view. In addition, the applicant has submitted a viability statement explaining that the site has significant abnormal development costs over £2.4 million. Adding a masonry wall would make the scheme of 100% affordable housing for rent unviable due to the additional cost of around £250,000 and delays it would add to the scheme. This is considered adequate justification for the use of a timber fence in this location.

Question 1: Do Members consider the design and appearance of the development to be acceptable?

58. Biodiversity and Tree Loss
Policy G9 of the CS relates to biodiversity improvements, with development being required to demonstrate an overall net gain for biodiversity commensurate with the scale of the development, including a positive contribution to the habitat network through habitat protection, creation and enhancement. LCC guidance seeks a net gain of 10% for biodiversity, in line with the Environment Act. Policy G9 also requires no significant adverse impact to the Leeds Habitat Network, and that the design of proposals provides new areas and opportunities for wildlife.
59. To note, the Biodiversity Net Gain: Good Practice Principles for Development document published by the Chartered Institute of Ecology and Environmental Management and others sets out that “achieving... net gains in biodiversity, where there are wider benefits for society, is more than simply outweighing losses with gains. It requires doing everything possible to avoid losing biodiversity in the first place...”. Indeed, in setting out the correct way to achieve biodiversity net gain, the professional guidance sets out ten good practice principles for biodiversity net gain. Principle Number 1 of the guidance (Apply the Mitigation Hierarchy) sets out that developers should “do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, [should developers] compensate for losses that cannot be avoided”.
60. The Ecology Impact Assessment (EclA) and Biodiversity Net Gain (BNG) report dated October 2023, and the Biodiversity Metric 4.0 Calculation Tool demonstrate that the development would result in a loss of 4.67 Habitat Units or a Biodiversity Net Gain of -23.11%. The EclA states that the scheme is unlikely to achieve a net gain for biodiversity without off-site mitigation. No off-site mitigation has been submitted. In addition, off-site delivery will only be accepted where there is clear evidence that the mitigation hierarchy has been applied. There is a standing objection from the LCC Nature team in relation to this net loss. As such, on the basis of available information, the proposal must therefore be considered in conflict with policy G9.
61. It is also proposed to remove 16 trees and potentially some small ones in group G25 along the eastern boundary. Policy LAND2 of the Natural Resources and Waste DPD requires replacement planting on a 3:1 ratio. This would require approximately 48 replacement trees although it is noted that the Arboricultural Impact Assessment has estimated that 75 replacement trees are required. Clarification is being sought on exactly which trees are to be felled. The removal of this amount of trees does not help with the biodiversity net gain scores, indeed LCC landscape have asked for more trees to be retained. In addition, several replacement trees are sited in rear gardens. These cannot be counted as replacement trees as their future stewardship cannot be guaranteed.

Question 2: Do Members consider the wider planning benefits and 100% provision of affordable housing justify the net biodiversity loss. Do Members have any further comments on biodiversity at the site?

62. Highways and Parking
Two vehicular access points are proposed off Hough Top Road creating a loop road within the site. This road has been designed to adoptable standards. A pedestrian link is proposed out of the northern part of the site and onto Harley Drive. The existing access off Hough Top will be closed and the existing access off Harley Drive will only permit vehicular access to the new sub-station.

63. Several objections have been received from the public disputing the results of the Transport Assessment. Public representations have also suggested that a second access point should come off Harley Drive rather than just Hough Top to alleviate any potential issues with traffic. Whilst there may be an alternative highways layout that could be acceptable on the site, the applicant is proposing a layout with access only from Hough Top. Highways have maintained no objection in terms of highway safety to this layout until recently when additional local representation has raised issues with the content of the Transport Assessment (TA). An addendum to the TA has been requested and LCC highways have now asked for a further traffic survey to be undertaken on Hough Top to assess the impact of weekend traffic on the adjacent road junctions. This traffic survey has been commissioned but not yet completed.
64. For background reference, at pre-application stage, it was suggested that an access point be considered from Harley Drive. It has also been recorded in several public representations that this was formerly the main access point to the site when the school was used as offices. The applicant did explore this option and received feedback from highways that this would not be supported against today's Transport SPD standards which do not support the creation of a junction crossroads. In addition, it would create a short cut or 'rat -run' through the new development. The option of 2 cul-de-sac's with one entrance on Hough Top was explored but not considered practical due to the size of the site. In addition, there is insufficient width between 82 and 84 Harley Drive to build a road to adoptable standards.
65. Whilst there is information outstanding in relation to highways modelling, officers would like to ask:

Question 3: Do Members consider the proposed highways layout acceptable and/or do members require any additional information?

66. Drainage
The site is located in Flood Zone 1 and there have been no records of any recent flooding within the area. The drainage strategy proposes infiltration to soakaways for surface water from the dwellings, and a combined infiltration tank with some attenuation to public sewer for all other surface water. The principles of the proposed drainage strategy are supported by LCC Flood Risk Management, however the submitted 'Overland Flow Assessment' drawing appears to indicate discharge of surface water onto Hough Top Road. This is an outstanding matter that is awaiting a response from the applicant.
67. In addition, Yorkshire Water require amendments to the proposed drainage strategy as they will not accept any discharge of surface water to their drains. The applicant proposes discharge of highway surface water to an infiltration basin, which will then discharged to a public sewer at a restricted flow of 5 litres per second. The preference of Yorkshire Water is for all surface water to be managed via infiltration techniques. This creates a conflict in that the S38 Highways team will not adopt the new highway with the inclusion of a highways infiltration tank. This is due to the difficulty in maintaining the infiltration tank and the risk that it could silt up over time and then cause flooding back into the highway. Theoretically, this could be resolved via a planning condition, and Yorkshire Water have suggested this route.

Question 4: Do Members consider that the detailed drainage strategy can be resolved via condition?

68. **CONCLUDING COMMENTS:**

Although the proposed development includes a number of positive aspects, in particular the 100% affordable housing provision, there are a several issues concerning officers. They include the net biodiversity loss proposed, the design and appearance of the scheme, the representations in relation to the proposed highways layout and the surface water drainage strategy. Panel Members are therefore respectfully requested to provide answers to the questions posed in the main body of this report, all of which are reproduced below for ease of reference, and to offer any additional comments that they consider appropriate regarding this development proposal.

Question 1: Do Members consider the design and appearance of the development to be acceptable?

Question 2: Do Members consider the wider planning benefits and 100% provision of affordable housing justify the net biodiversity loss. Do Members have any further comments on biodiversity at the site?

Question 3: Do Members consider the proposed highways layout acceptable and/or do members require any additional information?

Question 4: Question 4: Do Members consider that the detailed drainage strategy can be resolved via condition?

BACKGROUND PAPERS:

Application file reference: 23/06663/FU

Certificate of ownership: Signed as Applicant

