



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/25/2036

Downsview Farm , Clay Lane, Cootham, West Sussex, RH20 4HL

DESCRIPTION:

Regularisation of building providing holiday let, agricultural training room and office (Retrospective)

RELEVANT PLANNING HISTORY:

DC/20/1632	Prior notification for the erection of a straw and machinery storage barn	Prior Approval Required and PERMITTED on 20.10.2020
DC/17/2639	Proposed erection of single storey training/accommodation building for agricultural and butchery courses	Application Permitted on 19.01.2018
DC/11/0751	Cold store facility to store approx. 50 - 60 carcasses per week, installation of an emergency super silent generator, toilet, changing area and 2 No. deep freezers	Application Permitted on 22.11.2011
DC/10/0785	Siting of temporary mobile home for agricultural worker and associated residential curtilage	Application Permitted on 27.09.2010

DESCRIPTION OF THE SITE

The application site forms part of Downsview Farm, a working agricultural holding located in the countryside to the south-west of Storrington. The buildings lie entirely within the administrative area of Horsham District Council with land to the south in close proximity to the National Park boundary.

The site is accessed via a private track from Clay Lane and comprises an established farmyard containing a number of agricultural and ancillary buildings, including a cold store and former training/accommodation structures approved under earlier permissions. The surrounding area is predominantly rural in character, consisting of agricultural land, hedgerows and sporadic farmsteads. Existing landform, boundary planting and farm buildings provide a degree of visual containment to the site.

DESCRIPTION OF THE APPLICATION

The application seeks retrospective planning permission for the regularisation of an existing building at Downsview Farm which is currently used to provide a holiday let, an agricultural training room and associated office accommodation. The development has already been constructed and is in use, and

the application therefore seeks to regularise both the operational development and the mixed use of the building.

The proposal represents an evolution of development previously approved on the site, including permissions for agricultural training and accommodation, cold storage facilities, and agricultural buildings. The current application consolidates these uses within a single building and formalises the tourism-related holiday let element alongside the ongoing agricultural training and office functions.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Paragraph 8

Paragraph 11

Paragraphs 80-84 – Supporting a prosperous rural economy

Paragraph 81 - Sustainable rural tourism and leisure development

Paragraphs 130–134 – Achieving well-designed places

Paragraph 174 – Protecting and enhancing valued landscapes

Paragraphs 104–113 – Promoting sustainable transport

Paragraphs 152–158 – Climate change mitigation and adaptation

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development

Policy 3 - Strategic Policy: Development Hierarchy

Policy 7 - Strategic Policy: Economic Growth

Policy 9 - Employment Development

Policy 10 - Rural Economic Development

Policy 25 - Strategic Policy: The Natural Environment and Landscape Character

Policy 26 - Strategic Policy: Countryside Protection

Policy 30 - Protected Landscapes

Policy 32 - Strategic Policy: The Quality of New Development

Policy 33 - Development Principles

Policy 40 - Sustainable Transport

Policy 41 – Parking

Storrington, Sullington & Washington Neighbourhood Plan (2019)

Policy 1 – A Spatial Plan for the Parishes

Policy 8 – Countryside Protection

Policy 10 – Tourist Accommodation

Policy 11 – Education Uses

Policy 17 – Traffic & Transport

Policy 18 – Car Parking

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 1 year. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

Horsham District Local Plan (2023-40) (Regulation 19):

Strategic Policy 1: Sustainable Development

Strategic Policy 6: Climate Change

Strategic Policy 7: Appropriate Energy Use

Strategic Policy 8: Sustainable Design and Construction

Strategic Policy 9: Water Neutrality

Strategic Policy 10: Flooding

Strategic Policy 11: Environmental Protection

Strategic Policy 13: The Natural Environment and Landscape Character

Strategic Policy 14: Countryside Protection

Strategic Policy 16: Protected Landscapes

Strategic Policy 17: Green Infrastructure and Biodiversity

Policy 18: Local Green Space

Strategic Policy 19: Development Quality

Strategic Policy 20: Development Principles

Strategic Policy 24: Sustainable Transport

Policy 25: Parking

Policy 28: Community Facilities, Leisure and Recreation

Strategic Policy 29: New Employment

Strategic Policy 30: Enhancing Existing Employment

Policy 31: Rural Economic Development

Policy 32: Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses

Strategic Policy 34: Tourism Facilities and Visitor Accommodation

Policy 45: Replacement Dwellings and House Extensions in the Countryside

Supplementary Planning Guidance:

Planning Obligations and Affordable Housing SPD (2017)

Community Infrastructure Levy (CIL) Charging Schedule (2017)

Storrington & Sullington Parish Design Statement

Planning Advice Notes:

Facilitating Appropriate Development

Biodiversity and Green Infrastructure

REPRESENTATIONS AND CONSULTATIONS RESPONSES

Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

Consultations:

INTERNAL CONSULTATIONS

HDC Compliance: Comments received

HDC Environmental Health: No Comment (20/01/2026)

OUTSIDE AGENCIES

WSCC Highways: No Objection (07/01/2026)

The proposal includes 2 parking spaces for the holiday let and 6 for the butchery training courses. The change to the application with the inclusion of the holiday let will not generate a significant uplift in traffic levels over what is currently permitted (course accommodation). No additional construction is proposed in this application.

WSCC Lead Local Flood Authority: No response received

SDNPA: Adjoining Authority Consultation: Comment (05/01/2026)

Although some existing lighting associated with the holiday let may already be present, the SDNPA advises that any development should adopt a sensitive lighting strategy. The South Downs National Park Dark Skies Technical Advice Note (Version 2, 2021) provides relevant guidance, and due regard should be given to National Park purposes by taking all possible measures to reduce light pollution and limit external illumination.

If the Local Planning Authority is minded to grant permission, it is recommended that a suitably worded condition is imposed to ensure lighting is controlled to minimise unnecessary light spill and avoid adverse effects on local amenity, wildlife, and the National Park.

PUBLIC CONSULTATIONS:

Representations:

1 letter of Objection have been received from 1 address, objecting to the application on the following grounds:

- Increase in vehicles accessing and parking at the site
- Safety of access arrangements

Storrington Parish Council:

None received

Member Comments:

None received

HUMAN RIGHTS AND EQUALITY:

The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of

the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

PLANNING ASSESSMENT

Principle of Development and Use

The site lies outside any defined built-up area and is therefore within the countryside for the purposes of Policies 26 and 10 of the HDPF. Policy 26 seeks to restrict development in the countryside unless it is essential to the location and does not result in an unacceptable increase in activity. Policy 10, supported by NPPF paragraphs 80–84, encourages rural economic development and diversification where it supports agricultural enterprises and the rural economy.

The use of the building for agricultural training and office purposes is closely related to the established agricultural operation at Downsview Farm and is consistent with previously approved uses on the site. The holiday let use introduces a tourism element; however, this is small-scale, contained within an existing building and closely linked to the farm enterprise. NPPF paragraph 81 supports sustainable rural tourism where it respects the character of the countryside.

The proposal supports rural diversification by providing small-scale holiday accommodation linked to an existing agricultural enterprise. This aligns with HDPF Policy 7 and Policy 10, as well as NPPF paragraphs 80–84 and 81, which seek to support economic growth and sustainable rural tourism.

The development contributes to the local economy through visitor spending, supports the long-term viability of the farm, and provides opportunities for agricultural training and education. These benefits weigh positively in the planning balance.

Given the planning history, the established mixed agricultural and training uses, and the limited scale of the holiday accommodation, the principle of the development is considered acceptable and compliant with Policies 10 and 26 of the HDPF and the NPPF.

Visual Impact and Setting of the South Downs National Park:

Although the site is not within the South Downs National Park, its proximity requires careful consideration of any indirect impacts on the Park's setting, in accordance with HDPF Policy 30 and NPPF paragraph 174.

The building is located within an established farmyard and is read in the context of existing agricultural development. Its scale, form and siting are consistent with typical farm buildings, and views are largely contained by existing bunding, vegetation and landform. As such, the development does not adversely affect the landscape character of the area nor the setting, character or special qualities of the South Downs National Park.

The proposal is therefore considered compliant with Policies 25, 30, 32 and 33 of the HDPF and the NPPF.

Impact on Amenity

Policy 33 of the HDPF and NPPF paragraph 130 seek to ensure that development does not result in unacceptable harm to the amenity of neighbouring occupiers.

The site is relatively isolated. The nearest residential dwellings are the applicant's own property, Downsview Farmhouse, and Cootham Farmhouse, some 240m to the north-west of the application site. The scale and nature of the uses are limited and reflect existing activity levels associated with the farm and previously approved training accommodation. There is no evidence to suggest significant additional noise, disturbance or overlooking arising from the development.

Accordingly, the proposal is not considered to result in unacceptable harm to residential amenity and complies with Policy 33 of the HDPF and relevant sections of the NPPF.

Transport and Parking:

Access to the site is via the existing farm access from Clay Lane. Policy 40 of the HDPF and NPPF paragraphs 104–113 require development to provide safe and suitable access without severe residual impacts on the highway network.

The level of traffic associated with the holiday let and training use is modest and comparable to that previously approved on the site. The existing access arrangements are considered adequate, and sufficient space exists within the farmyard for parking and turning. It is noted that the County Highway Authority have assessed this proposal and identified no concerns. As such, the proposal therefore accords with Policies 40 and 41 of the HDPF and the NPPF.

Water Neutrality:

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement

SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Climate Change:

Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change. The proposal involves the re-use of an existing building rather than new build development, which reduces embodied carbon and resource use. The scale of the development is modest and does not give rise to significant energy demands beyond those typical of small rural enterprises.

The proposed development includes the following measures to build resilience to climate change and reduce carbon emissions:

- Water consumption limited to 110litres per person per day
- Requirement to provide full fibre broadband site connectivity
- Dedicated refuse and recycling storage capacity
- Cycle parking facilities

The proposal is therefore considered acceptable in climate change terms.

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Biodiversity Net Gain (BNG):

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG (unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains (on unregistered sites) and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of:

- The application is retrospective made under Section 73(A) of the Town and Country Planning Act.

Planning Balance and Conclusion:

In assessing the proposal, regard has been had to the statutory duty under section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine the application in accordance with the Development Plan unless material considerations indicate otherwise.

The development comprises the regularisation of an existing building providing a holiday let, agricultural training room and office accommodation within an established farmyard in the countryside. The principle of agricultural training and ancillary accommodation on the site has previously been accepted through earlier permissions, and the proposal represents a modest and logical form of farm diversification.

The development supports the rural economy, provides small-scale tourism accommodation, and contributes to the ongoing viability of the agricultural holding, in accordance with Policies 7, 10 and 11 of the Horsham District Planning Framework (2015) and paragraphs 80–84 and 81 of the National Planning Policy Framework (2024).

The proposal does not result in unacceptable harm to the character or appearance of the countryside, nor to the setting of the South Downs National Park. The building is read in the context of existing agricultural development, is well screened by landform and vegetation, and is of an appropriate scale and appearance, in accordance with Policies 25, 30, 32 and 33 of the HDPF and relevant sections of the NPPF.

There are no material adverse impacts on residential amenity or highway safety, and the modest level of activity associated with the uses would not lead to a significant increase in activity in the countryside. Appropriate access and parking arrangements are in place, satisfying Policies 40 and 41 of the HDPF.

In terms of environmental considerations, the development involves the re-use of an existing building and incorporates appropriate water efficiency measures. Subject to the recommended condition controlling water usage, the proposal would not result in a likely significant effect on the Arun Valley SAC, SPA or Ramsar site, either alone or in combination with other plans or projects, allowing the Local Planning Authority to discharge its duties under the Habitats Regulations.

When weighed in the planning balance, the economic and social benefits associated with rural diversification, tourism provision and support for an established agricultural enterprise outweigh the limited and manageable impacts identified. The proposal therefore constitutes sustainable development and is considered to accord with the Development Plan and the National Planning Policy Framework as a whole.

The retrospective development at Downsview Farm is considered acceptable in principle and does not result in unacceptable impacts in terms of landscape character, the setting of the South Downs National Park, residential amenity, highway safety or sustainability. The proposal accords with the relevant policies of the Horsham District Planning Framework and the National Planning Policy Framework and is therefore recommended for approval, subject to appropriate conditions.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council has adopted a Community Infrastructure Levy (CIL) Charging Schedule which took effect on 1st October 2017.

It is considered that this development constitutes CIL liable development.

Use Description	Proposed	Existing	Net Gain
Agricultural		44.7m2	
Mixed CIL use , comprising:	117.8		
Residential CIL floorspace (holiday let element); (49.6m2)			
Non-residential employment floorspace (office / agricultural training) (68.2m2)			
		Total Gain	73.1
		Total Demolition	0

Please note that the above figures will be reviewed by the CIL Team prior to issuing a CIL Liability Notice and may therefore change.

Exemptions and/or reliefs may be applied for up until the commencement of a chargeable development.

In the event that planning permission is granted, a CIL Liability Notice will be issued thereafter. CIL payments are payable on commencement of development.

Recommendation: Application Permitted

Conditions:

- 2 **Regulatory Condition:** The development hereby permitted shall be used for the purposes of short-term holiday-let accommodation and for the provision of agricultural and butchery courses, and associated accommodation, in association with the agricultural holding of Downsview Farm only.

Reason: The site lies in an area where, in accordance with Policy 26 of the Horsham District Planning Framework (2015), development unrelated to an essential rural activity would not normally be permitted.

- 3 **Regulatory Condition:** The short-term holiday let accommodation hereby permitted shall be managed in accordance with the following:
- i) The accommodation shall be occupied for holiday and short-term let purposes only;
 - ii) The accommodation shall not be occupied as a person's sole, or main place of residence;
 - iii) The accommodation shall not be occupied by any one person for a period exceeding 28 days in any calendar year;
 - iv) The accommodation shall at all times be managed and supervised by the occupiers of Downsview Farm

- v) The owners / operators shall maintain an up-to-date register of the names of all occupiers of the accommodation on the site, and of their main home addresses, and shall make this information available to the Local Planning Authority upon request.

Reason: To maintain the availability of the site as short term holiday tourist accommodation in accordance with Policies 10, 11 and 26 of the Horsham District Planning Framework (2015).

- 4 **Regulatory Condition:** Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (and/or any Order revoking and/or re-enacting that Order) no development falling within Classes A, AA, B, C, D or E of Part 1 of Schedule 2 of the Order shall take place to the holiday let accommodation hereby permitted without express planning consent from the Local Planning Authority first being obtained.

Reason: In the interest of visual amenity and due to preserve the historic character of the site in accordance with Policies 33 and 34 of the Horsham District Planning Framework (2015).

- 5 **Regulatory Condition:** The vehicle parking spaces serving the development hereby permitted, as shown on the Proposed Site Plan, shall be retained and kept available for that purpose at all times.

Reason: To ensure the continued availability of adequate parking provision in the interests of highway safety and convenience, in accordance with Policy 40 of the Horsham District Planning Framework (2015).

- 6 **Regulatory Condition:** Within 3 months of the date of the permission hereby granted, cycle parking facilities to serve the development shall be provided within the side garden of the approved building. The facilities shall thereafter be retained for use at all times. The cycle parking facilities shall thereafter be retained as such for their designated use.

Reason: To ensure that there is adequate provision for the parking of cycles in accordance with Policy 40 of the Horsham District Planning Framework (2015).

- 7 **Regulatory Condition:** The holiday accommodation hereby permitted shall meet the optional requirement of building regulation G2 to limit the water usage of each dwelling to no more than 110 litres per person per day. The subsequently installed water limiting measures shall thereafter be retained.

Reason: To limit water use in order to improve the sustainability of the development in accordance with Policy 37 of the Horsham District Planning Framework (2015), and to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), and to allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 8 **Regulatory Condition:** Within 3 months of the date of the permission hereby granted, the necessary in-building physical infrastructure and external site-wide infrastructure to enable superfast broadband speeds of a minimum 30 megabits per second through full fibre broadband connection shall be provided to the premises.

Reason: To ensure a sustainable development that meets the needs of future occupiers in accordance with Policy 37 of the Horsham District Planning Framework (2015).

- 9 **Regulatory Condition:** No external lighting or floodlighting shall be installed other than with the permission of the Local Planning Authority by way of formal application.

Reason: In the interests of the amenities of the locality and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

NOTE TO APPLICANT

Biodiversity Net Gain Condition

Paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 states that planning permission is deemed to have been granted subject to the "biodiversity gain condition" which means development granted by this notice must not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

Under Regulations 4, 5, 7 & 8 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024 the statutory biodiversity gain condition required by Schedule 7A to the Town and Country Planning Act 1990 (as amended) does not apply in relation to planning permission for development which:

1. does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (a hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric);
2. is the subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015;
3. is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain planning condition which applies in relation to another development (In determining whether a development is undertaken solely or mainly for this purpose, no account is to be taken of any facility for the public to access or to use the site for educational or recreational purposes, if that access or use is permitted without the payment of a fee);
4. consists of no more than 9 dwellings, is carried out on a site which has an area no larger than 0.5 hectares, and consists exclusively of dwellings which are self-build or custom housebuilding ("Self-build or custom housebuilding" has the same meaning as in section 1(A1) of the Self-build and Custom Housebuilding Act 2015 (as amended)).

In addition, the Biodiversity Gain Plan Condition does not apply to applications for major development made before 12 February 2024, or non-major development made before 2 April 2024.

Based on the information submitted in the planning application documents, the Planning Authority considers that this permission is exempt from biodiversity net gain, and as such does not require approval of a biodiversity gain plan before development is begun.

Statutory exemptions and transitional arrangements

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These can be found at Paragraph: 003 Reference ID: 74-003-20240214 of the Planning Practice Guidance, which can be found at <https://www.gov.uk/guidance/biodiversity-net-gain>.

Irreplaceable habitat

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including

