

Reference: 19/00219/FUL	Site: Barvills Farm Princess Margaret Road East Tilbury RM18 8PA
Ward: East Tilbury	Proposal: Erection of 3no. detached properties with cart lodges which includes the demolition of existing agricultural buildings. A new access road with associated hardstanding for passing bays, turning head and associated landscaping.

Plan Number(s):		
Reference	Name	Received
06A	Sections	14th March 2019
09A	Proposed Plans	14th March 2019
01A	Proposed Plans	12th February 2019
03	Existing Plans	12th February 2019
04	Existing Plans	12th February 2019
05	Location Plan	12th February 2019
07	Proposed Plans	12th February 2019
08	Proposed Plans	12th February 2019
02B	Proposed Site Layout	26th March 2019
11	Proposed Site Layout	26th March 2019

The application is also accompanied by:	
<ul style="list-style-type: none"> - Supporting Planning Statement, received 7 March 2019 - Ecological Report, prepared by T4 Ecology Ltd, dated February 2019 	
Applicant: Mr Karl Osborne	Validated: 12 February 2019 Date of expiry: 30 April 2019 (extension of time agreed with applicant)
Recommendation: Refusal	

This planning application is scheduled for determination by the Council's Planning Committee because it has been called in by Councillors B and G Rice, C Kent, Worrall, and Shinnick to consider the proposal against Green Belt policy.

1.0 DESCRIPTION OF PROPOSAL

- 1.1 The proposal seeks to demolish two agricultural buildings to the north of the site and erect 3 detached, 4 bedroom dwellings with associated open cart lodges, hardstanding and vehicle access road and landscaping. Access to the application site is proposed to from Station Road to the south of the site.

2.0 SITE DESCRIPTION

- 2.1 The application site forms part of a wider site at Barvills Farm. The wider site has historically been used for agricultural purposes, while the site directly to the north retains agricultural buildings and associated operations. Further to the north west of the site lies Barvills Solar farm which was approved in 2015 (planning application ref. 15/00288/FUL).
- 2.2 The site is currently access from Princess Margaret Road to the east, however, this access is proposed to be retained solely for the continued agricultural use of the site to the immediate east of the application site. An historical access exists to the south west of the site on Station Road which is proposed to be removed and replaced with a new vehicle access to the north of the site on Station Road.
- 2.3 The site lies within Metropolitan Green Belt and also lies within the Zone of Influence for one or more of the European designated sites scoped into the emerging Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The site is not within a high flood risk zone.

3.0 RELEVANT HISTORY

Application Reference	Description of Proposal	Decision
65/00485/FUL	Erection of two agricultural worker's bungalows	Refused
64/00810/FUL	Erection of two Agricultural farm labourers bungalows	Refused

4.0 CONSULTATIONS AND REPRESENTATIONS

- 4.1 Detailed below is a summary of the consultation responses received. The full version of each consultation response can be viewed on the Council’s website via public access at the following link: www.thurrock.gov.uk/planning

PUBLICITY:

- 4.2 This application has been advertised by way of individual neighbour notification

letters, press advert and public site notice which has been displayed nearby. No written comments have been received.

CADENT:

No objection, subject to informative.

HEALTH AND SAFETY EXECUTIVE:

Do not advise against.

NATURAL ENGLAND:

No objection, subject to conditions relating to sewage drainage.

NATIONAL GRID:

No objection subject to conditions.

ENVIRONMENTAL HEALTH OFFICER:

No objection subject to conditions.

LANDSCAPE AND ECOLOGY ADVISOR:

No objection subject to conditions.

HIGHWAYS:

No objection subject to the applicant entering into a s106 legal agreement in relation to highway mitigation measures reducing the speed limit along Station Road.

ESSEX COUNTY COUNCIL SPECIALIST ARCHAEOLOGICAL ADVICE:

No objection.

5.0 POLICY CONTEXT

National Planning Guidance

5.1 National Planning Policy Framework (NPPF) (2019)

The revised NPPF was published on 24 July 2018 and again in February 2019. Paragraph 11 of the Framework sets out a presumption in favour of sustainable development. Paragraph 47 of the Framework confirms the tests in s.38 (6) of the Planning and Compulsory Purchase Act 2004 and s.70(2) of the Town and Country Planning Act.

The following headings and content of the NPPF are relevant to the consideration of the current proposals:

5. Delivering a sufficient supply of homes
11. Making effective use of land
12. Achieving well-designed places
13. Protecting Green Belt land
15. Conserving and enhancing the natural environment

5.2 Planning Practice Guidance

In March 2014 the Department for Communities and Local Government (DCLG) launched its planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning policy guidance documents cancelled when the NPPF was launched. PPG contains 42 subject areas, with each area containing several subtopics. Those of particular relevance to the determination of this planning application comprise:

- Design
- Determining a planning application
- Natural Environment
- Use of Planning Conditions

Local Planning Policy

5.3 Thurrock Local Development Framework (2015)

The Council adopted the “Core Strategy and Policies for the Management of Development Plan Document” in December 2011 which was subsequently amended in 2015. The following Core Strategy policies apply to the proposals:

Spatial Policies:

- CSSP1 (Sustainable Housing and Locations);
- CSSP4 (Sustainable Green Belt)

Thematic Policies:

- CSTP1 (Strategic Housing Provision)
- CSTP19 (Biodiversity)
- CSTP22 (Thurrock Design)
- CSTP23 (Thurrock Character and Distinctiveness)²

Policies for the Management of Development:

- PMD1 (Minimising Pollution and Impacts on Amenity)²
- PMD2 (Design and Layout)²
- PMD6 (Development in the Green Belt)
- PMD8 (Parking Standards)³
- PMD9 (Road Network Hierarchy)

[Footnote: ¹ New Policy inserted by the Focused Review of the LDF Core Strategy. ² Wording of LDF-CS Policy and forward amended either in part or in full by the Focused Review of the LDF Core Strategy. ³ Wording of forward to LDF-CS Policy amended either in part or in full by the Focused Review of the LDF Core Strategy].

5.4 Thurrock Local Plan

In February 2014 the Council embarked on the preparation of a new Local Plan for the Borough. Between February and April 2016 the Council consulted formally on an Issues and Options (Stage 1) document and simultaneously undertook a 'Call for Sites' exercise. It is currently anticipated that consultation on an Issues and Options (Stage 2 Spatial Options and Sites) document will be undertaken in 2018.

5.5 Thurrock Design Strategy

In March 2017 the Council launched the Thurrock Design Strategy. The Design Strategy sets out the main design principles to be used by applicants for all new development in Thurrock. The Design Strategy is a supplementary planning document (SPD) which supports policies in the adopted Core Strategy.

6.0 **ASSESSMENT**

6.1 The assessment below covers the following material considerations:

- I. Principle of development and impact upon the Green Belt
- II. Design and Layout

- III. Impact Upon Landscape and Ecology
- IV. Access, Traffic Impact and Car Parking
- V. Other Matters

I. PRINCIPLE OF DEVELOPMENT AND IMPACT UPON THE GREEN BELT

6.2 Under this heading, it is necessary to refer to the following key questions:

1. Whether the proposals constitute inappropriate development in the Green Belt;
2. The effect of the proposals on the open nature of the Green Belt and the purposes of including land within it; and
3. Whether the harm to the Green Belt is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify inappropriate development.

1. Whether the proposals constitute inappropriate development in the Green Belt

6.3 The site is identified on the LDF Core Strategy Proposals Map as being within the Green Belt where policies CSSP4 and PMD6 apply. Policies CSSP4 PMD6 state that the Council will maintain, protect and enhance the open character of the Green Belt in Thurrock. These policies aim to prevent urban sprawl and maintain the essential characteristics of the openness and permanence of the Green Belt to accord with the requirements of the NPPF.

6.4 Paragraph 133 within Chapter 13 of the NPPF states that the Government attaches great importance to Green Belts and that the *“fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.”* Paragraph 143 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. The NPPF sets out a limited number of exceptions and the current proposal does not fall within the listed exempt categories.

6.5 The Planning Statement submitted maintains that application site is Previously Developed Land. The NPPF's definition of Previously Developed Land is listed below;

‘Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management

procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

- 6.6 The proposal involves the demolition of the existing agricultural buildings towards the north and east of the site and would introduce various forms of built form across the site including 3 detached dwellings, a cart lodge allocated for each unit and associated vehicle access roads and hardstanding.
- 6.7 The NPPF maintains that land that was last occupied by a permanent structure, it should not be assumed, the whole curtilage should be developed and further asserts that land last occupied by agricultural buildings are exempt from being considered Previously Developed Land. The existing buildings to be demolished, towards the north of the site, were previously used for herding of livestock and, as such, the site is considered to be agricultural land and is not considered Previously Developed Land. No other evidence has been provided by the applicant to demonstrate that the buildings are not agricultural and therefore would not be considered Previously Developed Land.
- 6.8 Furthermore, the existing agricultural buildings are concentrated towards the north of the site, while the proposal would extend built form towards the south of the site, towards Station Road. Consequently, it is considered the open part of the south of the site should not be assumed to be developed.
- 6.9 Consequently, the proposals comprise inappropriate development in the Metropolitan Green Belt, which is harmful by definition, with reference to the NPPF and Policy PMD6. In accordance with the NPPF and Policy PMD6, substantial weight should be given to this harm.

2. The effect of the proposals on the open nature of the Green Belt and the purposes of including land within it

- 6.10 Having established that the proposals are inappropriate development, it is necessary to consider the matter of harm. Inappropriate development is, by definition, harmful to the Green Belt, but it is also necessary to consider whether there is any other harm to the Green Belt and the purposes of including land therein.
- 6.11 Paragraph 134 of the NPPF sets out the five purposes which the Green Belt serves as follows:
- a. to check the unrestricted sprawl of large built-up areas;

- b. to prevent neighbouring towns from merging into one another;
- c. to assist in safeguarding the countryside from encroachment;
- d. to preserve the setting and special character of historic towns; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.12 In response to each of these five purposes:

A. to check the unrestricted sprawl of large built-up areas

6.13 The site is situated within East Tilbury and forms the southern part of Barvills Farm. For the purposes of the NPPF, the site is considered to be outside of any 'large built up areas'. It would not therefore result in the sprawling of an existing built up area, but it would nonetheless represent the addition of new urban form on the site.

B. to prevent neighbouring towns from merging into one another

6.14 The development would not conflict with this Green Belt purpose.

C. to assist in safeguarding the countryside from encroachment

6.15 With regard to the third Green Belt purpose, the proposal would involve built development on what is currently an open and undeveloped part of the site. The proposed development would spread across the curtilage of the site to where there is currently no built form. It is important to note that the proposed dwellings, cart lodges, hardstanding and associated vehicle access/roads extend beyond the footprint of the existing agricultural buildings. It is therefore considered that the proposal would constitute an encroachment of built development into the countryside in this location and would constitute material harm to the openness character of the Green Belt. The development would consequently conflict with this purpose.

D. to preserve the setting and special character of historic towns

6.16 As there are no historic towns in the immediate vicinity of the site, the proposals do not conflict with this defined purpose of the Green Belt.

E. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

6.17 In general terms, the development could occur in the urban area and, in principle; there is no spatial imperative why Green Belt land is required to accommodate the proposals. The erection of 3 detached dwellings with associated

hardstanding/vehicle accesses and fencing are inconsistent with the fifth purpose of the Green Belt.

- 6.18 In light of the above analysis, it is considered that the proposals would be contrary to purposes c and e of the above listed purposes of including land in the Green Belt. Substantial weight should be afforded to these factors.

3. Whether the harm to the Green Belt is clearly outweighed by other considerations so as to amount to the Very Special Circumstances necessary to justify inappropriate development

- 6.19 Neither the NPPF nor the Adopted Core Strategy provide guidance as to what can comprise 'Very Special Circumstances', either singly or in combination. However, some interpretation of Very Special Circumstances has been provided by the Courts. The rarity or uniqueness of a factor may make it very special, but it has also been held that the aggregation of commonplace factors could combine to create very special circumstances (i.e. 'very special' is not necessarily to be interpreted as the converse of 'commonplace'). However, the demonstration of very special circumstances is a 'high' test and the circumstances which are relied upon must be genuinely 'very special'. In considering whether 'very special circumstances' exist, factors put forward by an applicant which are generic or capable of being easily replicated on other sites, could be used on different sites leading to a decrease in the openness of the Green Belt. The provisions of very special circumstances which are specific and not easily replicable may help to reduce the risk of such a precedent being created. Mitigation measures designed to reduce the impact of a proposal are generally not capable of being 'very special circumstances'. Ultimately, whether any particular combination of factors amounts to very special circumstances will be a matter of planning judgment for the decision-taker.
- 6.20 With regard to the NPPF, paragraph 143 states that '*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*'. Paragraph 144 goes on to state that, when considering any planning application, local planning authorities "*should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*".
- 6.21 The Planning Statement and additional details submitted set out the applicant's Very Special Circumstances to justify inappropriate development in the Green Belt, they are:

- a) The proposed scheme would contribute to the shortfall of housing supply in Thurrock;
- b) Prior Approval process allows for previously used barns to be utilised for housing purposes with the requirement for planning permission. A planning application has been submitted to provide the best possible homes in order to utilise the volumes to provide future occupants with quality sustainable living space;
- c) Applications at Manor House Farm (planning application ref. 15/00183/FUL) and Unit 1, Garlesters Farm (planning application ref. 11/00174/FUL) were previously approved;
- d) Properties have been designed to reduce the impact to the Green Belt.

These four reasons put forward by the applicant will now be individually assessed below:

a) Shortfall of housing supply

The Council acknowledges that there is presently a lack of 5 year housing supply. However the NPPG advises that 'unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt' (Paragraph 034 Reference ID: 3-034-20141006).

The current proposals would provide a limited benefit in contributing towards addressing the shortfall in the supply of new housing as set out in Core Strategy policy delivery targets and as required by the NPPF. The matter of housing delivery contributes towards very special circumstances and should therefore be accorded significant weight in the consideration of this application. However, as noted above, this single issue on its own cannot comprise the very special circumstances to justify inappropriate development, and as such, for such circumstances to exist this factor must combine with other considerations.

b) Prior Approval allows barns to be utilised for housing purposes

- 6.22 The criteria set out under the General Permitted Development Order 2015, as amended, allows for barns or agricultural buildings to be converted into residential buildings without requiring planning permission. The agent asserts the applicant could submit a prior approval application to facilitate residential development. However, no prior approval application has been submitted and, therefore, the applicant has not demonstrated that the such a proposed scheme would meet all the relevant criteria under Schedule 2, Part 3, Class Q of the GPDO 2015, as

amended. Moreover, any application for prior approval to convert any or part of the agricultural buildings on the site would involve the conversion of the agricultural buildings in their current location and broadly the same or identical form. This would be entirely different from the development currently under consideration and provides no justification for the proposed development as submitted. Consequently, no weight is afforded to the prior approval argument.

c) Historical applications have previously been consented

- 6.23 The applicant has provided examples whereby residential schemes have been previously consented within the Green Belt. The applicant refers specifically to Manor House Farm (planning application ref. 15/00183/FUL) and Garlesters Farm (planning application ref. 11/00174/FUL).
- 6.24 In the case of application 15/00183/FUL (Manor House Farm), amongst other matters, the scheme resulted in a 20% decrease in volume across the site, improving the openness to the Green Belt. Consequently, it was deemed that there would not be a material harm to the openness character of the Green Belt or the purposes of including land within it.
- 6.25 With regards to application 11/00174/FUL (Garlesters Farm), the Planning Committee found there to be very special circumstances case based largely on the fact that the site benefited from an unrestricted lawful use for commercial purposes including the storage of cars and vehicle repairs, established at appeal in 1991.
- 6.26 The examples above are very different from the current proposal and it is not, therefore, considered that the examples of other residential development permitted within the Green Belt set a precedent for this current proposal which is contrary to Green Belt policy. No weight is given to this argument.

d) Properties have been designed to reduced impact to Green Belt

- 6.27 The applicant has put forward that the proposal has been designed so as to reduce its visual impact to the Green Belt. Section 3.2 of the Planning Statement submitted maintains that the proposal for three, four bedroom dwellings have been designed to improve the impact on the Green Belt in lieu of the existing buildings on the site.
- 6.28 However, the proposed development would represent a significant increase in the footprint, hardstanding and volume over and above the original buildings at the site.
- 6.29 The proposed dwellings, each allocated with a cart lodge, would significantly increase the footprint and volume across the site. The footprint and associated

hardstanding would increase by 151% and the volume would increase by 17%. The proposed hardstanding and associated roads are considered significant additions to the site and, moreover, the built form would be relocated across the site which would effectively bring the development closer to the southern boundary along Station Road. The proposed development would, therefore, be harmful to the openness of the Green Belt.

6.30 The reduced visibility of the proposed development due to the design is not considered to be a valid argument for permitting the development because of the emphasis upon preserving the openness of the Green Belt. The Planning Inspectorate has held in previous decisions that visibility is not the only issue for consideration in the Green Belt and just because a development cannot be readily seen should not make it acceptable. As a consequence no weight is given to this argument put forward by the applicant.

6.31 A summary of the weight which has been placed on the various Green Belt considerations is provided below:

Summary of Green Belt Harm and Very Special Circumstances			
Harm	Weight	Factors Promoted as Very Special Circumstances	Weight
Inappropriate development	Substantial	Lack Housing Supply	Significant
Reduction in the openness of the Green Belt			
Conflict (to varying degrees) with a number of the purposes of including land in the Green Belt – purposes a, c and e.		Prior Approval options	No weight
		Similar historical applications	No weight
		Dwellings have been designed so as to reduce impact to the Green Belt (ground level siting and design)	No weight

6.32 As ever, in reaching a conclusion on Green Belt issues, a judgement as to the balance between harm and whether the harm is clearly outweighed must be reached. In this case there is harm to the Green Belt with reference to both inappropriate development and loss of openness. However, this is not considered

to be the full extent of the harm. Several factors have been promoted by the applicant as 'Very Special Circumstances' and it is for the Committee to judge:

- i. the weight to be attributed to these factors;
- ii. whether the factors are genuinely 'very special' (i.e. site specific) or whether the accumulation of generic factors combines at this location to comprise 'very special circumstances'.

6.33 Each circumstance put forward by the applicant attempts to redress that balance in favour of the development. In accordance with the NPPF, the harm has to be *clearly* outweighed by Very Special Circumstances. Taking into account all Green Belt considerations, Members are advised that the case associated with this development proposal falls some considerable way short of constituting genuine very special circumstances and it follows that the application should be refused. There are no planning conditions that could be used to make the proposal acceptable in planning terms.

II. DESIGN AND LAYOUT

6.34 The proposed detached dwellings, with associated cart lodges would be located closer to the southern boundary of the site and therefore closer to Station Road. As already stated, built form would be concentrated towards the north of the site, with the additional development spread across the site and would be visible from Station Road. The ground levels of the application site are lower than the adjacent highway and the proposed dwellings would project 4.2 metres above the ground level at Station Road. The proposed dwellings would have a maximum height when viewed from Station Road at approximately 0.8m lower than the closest dwelling to the immediate south on Station Road. There is no specific concern in relation to the design of the proposals, however, they would be very apparent in the street scene as a result of being pulled further forward in the site.

III. IMPACT UPON LANDSCAPE AND ECOLOGY

6.35 The application site forms part of a wider site at Barvills Farm and remains a relatively open area and the development would appear very apparent in this environment.

6.36 An Ecology Assessment has been provided for the site. This confirms that the site is of low value for most protected species. There is an active badger sett adjacent to the site and therefore, the Council's Landscape and Ecology Advisor has recommended that it would be necessary for construction works to be carried out in accordance with an appropriate method statement to minimise the risk of any animal being killed or injured during the construction.

- 6.37 Additionally, Natural England has advised that the site falls within the 'Zone of Influence' (Zoi) for one of more of the European designated sites scoped into the emerging Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Essex Coast RAMS is a large-scale strategic project which involves a number of Essex authorities, including Thurrock Council, working together to mitigate the effects arising from new residential development. Once adopted, the RAMS will comprise a package of strategic measures to address such effects, which will be costed and funded through developer contributions. The issue of RAMS would become relevant if the application were being recommended favourably and the contribution could be secured via an appropriate legal agreement.
- 6.38 The Landscape and Ecology Advisor has commented that the proposed development would retain an area for new landscape provision (primarily towards the south and east of the site) and that the proposed 'wild garden' could provide good additional habitat if properly designed and maintained. It is considered that the proposed wild garden would provide a buffer zone between the proposed dwellings and the continuing farming operations to the north of the site. No landscape or ecology objections have been raised by the Landscape and Ecology Advisor, subject to suitable conditions.
- 6.39 Notwithstanding the above landscape and ecology advice, the development would be likely to have a significant and detrimental impact to visual amenity and be harmful to the openness character of the area. The development would conflict with Policies PMD2, CSTP22 of the Core Strategy and the criteria of the NPPF.

IV. ACCESS, TRAFFIC IMPACT AND CAR PARKING

- 6.40 The site is currently accessed from Princess Margaret Road to the east, however, this access is proposed to be retained solely for the continued agricultural use of the site to the immediate east. An historical access exists to the south west of the site on Station Road which is proposed to be removed and relocated.

During the consideration of the application, plans of the vehicle access to the site have been revised and the relocated more centrally along Station Road. The Council's Highways Officer has no objections to the proposed access but has confirmed, if the application were being recommended favourably, that a s106 legal agreement would be required to fund the extension of the 30 mile per hour speed limit further west of the site for the purposes of highway safety.

- 6.41 In terms of parking, the proposed development would provide adequate parking provision and the proposed development would comply with Policies PMD8 and PMD9 of the Core Strategy.

V. OTHER MATTERS

- 6.42 The Council's Environmental Health Officer has advised that the application site is adjacent to a former landfill THU004, which involved solid, non-hazardous industrial wastes arising from the historical Bata factories. On this basis, it has been advised that the landfill gas survey should be undertaken prior to the commencement of any development to ensure no gas has migrated within the curtilage of the application site. It has been further recommended that due to the age of the existing structures on site which are proposed to be demolished, an asbestos survey must be undertaken prior to commencement of any development at the site. These issues could be controlled via suitable planning condition if the application were being recommended favourably.
- 6.43 The Council's Environmental Health Officer raises no objections subject to the imposition of suitable planning conditions relating to construction and the above matters.

7.0 CONCLUSIONS

- 7.1 Where a proposal represents inappropriate development the applicant must demonstrate Very Special Circumstances which clearly outweigh the harm to the Green Belt.
- 7.2 The applicant has not advanced any factors which would amount to very special circumstances that could overcome the harm that would result by way of inappropriateness and the other harm identified in the assessment. There are no planning conditions that could be used to make the proposal acceptable in planning terms. The proposal is clearly contrary to Policies PMD6, PMD2 and CSTP22 of the adopted Thurrock Local Development Framework Core Strategy and Policies for the Management of Development (as amended 2015) and the National Planning Policy Framework 2018.

8.0 RECOMMENDATION

- 8.1 Refuse for the following reasons:

Reason:

1. The proposed development would, by reason of its scale, siting and location within the rural setting result in inappropriate development in the Green Belt which is by definition harmful. In addition, the development would also cause loss of openness due to the siting and substantial increase in the scale of the buildings proposed on the site. The circumstances put forward by the applicant do not constitute very

special circumstances to justify inappropriate development in the Green Belt. The proposal is therefore contrary to Policies PMD6, PMD2 and CSTP22 of the adopted Thurrock Local Development Framework Core Strategy and Policies for the Management of Development (as amended 2015) and the National Planning Policy Framework 2018.

Informative(s):-

- 1 Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) - Positive and Proactive Statement:

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing with the Applicant/Agent. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:

www.thurrock.gov.uk/planning

