Planning Committee





Application No.	24/01052/FUL & 24/010	053/LBC	
Site Address	Old Station, Moor Lane, Staines-upon-Thames, TW18 4BB		
Applicant	Mr James Olley – BARO Holdings Limited		
Proposal	24/01052/FUL		
	External Alterations including new openings at lower ground level, access ramps and railings to create an external play area.		
	24/01053/LBC Internal and External Alterations including new openings at lower ground level, access ramps and railings to create an external play area.		
Case Officer	Matthew Clapham		
Ward	Staines		
Called-in	These applications have been called in by Councillor Williams due to the impacts on the Listed Building.		
Application Dates	Valid: 02.09.2024	Expiry: 28.10.2024	Target: Extension of time agreed to 13.12.2024.
Executive Summary	Application 24/01052/FUL seeks to carry out external alterations to the existing Grade II Listed Building by making new larger openings to the basement level on two elevations of the building and adding access ramps between the external paved area and the building and adding railings to part of an area of hardstanding to create an external secure play area.		
	Application 24/01053/LBC seeks listed building consent for the same and also additional internal alterations.		
	The applications are associated with the conversion of the building from an office to a children's day nursery which does not require planning permission as application 24/00626/CPD granted a Certificate of Lawfulness for the proposed use of the building as a children's day nursery (Class E(f)).		
	The building is a Grade II Listed Building and is located within the Staines Conservation Area and the Zone 2 (1 in 1000 year event) flood risk area.		
	The proposal is conside	red acceptable in terms of	of its impacts upon the

	setting and significance of the Listed Building and would preserve and enhance the character of the Staines Conservation Area. There are not considered to be any issues regarding flood risk and the proposal would not give rise to any highway safety concerns. There would be no significant adverse impacts upon the residential amenity of any adjoining properties. The future use of the site as a children's day nursery does not require planning permission, as both the existing office use and the proposed nursery fall under Class E of the Use Classes Order. This has been lawfully confirmed by the issuing of a Certificate of Lawfulness for the use under 24/00626/CPD. The proposals are therefore considered to be acceptable.
Recommended Decision	Approve both applications subject to conditions, as set out at paragraph 8 of this report.

MAIN REPORT

1. **Development Plan**

- 1.1 The following policies in the Council's Core Strategy and Policies DPD 2009 are considered relevant to this proposal:
 - > SP1 (Location of Development)
 - > SP6 (Maintaining and Improving the Environment)
 - > LO1 (Flooding)
 - EN1 (Design of New Development)
 - ➤ EN5 (Buildings of Architectural and Historic Interest)
 - > EN6 (Conservation Areas, Historic Landscapes, Parks and Gardens)
 - CC3 (Parking Provision)
- 1.2 The National Planning Policy Framework (NPPF) December 2023 is also relevant. The Government also published a draft revised NPPF in July 2024. which has not currently been adopted. The draft NPPF is given limited weight currently.
- 1.3 On 19 May 2022, the Council agreed that the draft Spelthorne Local Plan 2022 – 2037 be published for public consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The public consultation for the Pre-Submission Publication version of the Local Plan ended on 21st September 2022 and the local plan was submitted to the Planning Inspectorate on 25th November 2022.
- 1.4 An Examination into the emerging Local Plan commenced on 23 May 2023. However, on 6 June 2023, the Council resolved to request that the Planning Inspector pause the Examination for a period of three (3) months to allow time for the new council to understand and review the policies and implications of the emerging Local Plan. After the three months pause, the Council would

- decide what actions may be necessary before the Local Plan Examination should proceed.
- 1.5 At the meeting of the Council on 19 July 2023, it was agreed that Catriona Riddell & Associates be appointed to provide 'critical friend' support to inform the options for taking the Local Plan process forward.
- 1.6 On 14 September 2023, the Council considered a report following the deferral in June. The report listed three options; to continue with the local plan to include further work (especially on design codes), to request a further pause, or to withdraw the local plan. On the day of the meeting, a letter was received from the Housing Minister stating that the Housing Secretary was directing the Council "not to take any step to withdraw the plan from examination..." The Council resolved to extend the pause in the Examination timetable until the proposed changes to the NPPF had been published before determining the next steps.
- 1.7 On 22 September 2023, the Inspector agreed to a further pause to the Examination and requested that the Council continue to address the issues that he identified in the first week of the Examination, in particular flood risk and its potential implications in relation to the site allocation and delivery strategy of the plan.
- 1.8 On 10 November 2023, the Environment Agency (EA) provided comments on Spelthorne's Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) seeking additional information, amendments and updates to the assessment.
- 1.9 Following the Environment & Sustainability Committee meeting on 29
 February 2024, it was resolved to propose, to the Planning Inspector,
 modifications to the emerging Local Plan, including the removal of all Green
 Belt site allocations, with the exception of two allocations that meet the need
 for Gypsy, Traveller and Travelling Showpeople, the removal of site
 allocations at high risk of flooding and to move some higher flood risk sites to
 the later plan period (years 11-15), and the withdrawal the Staines
 Development Framework as a core document.
- 1.10 On 19 March 2024 the Council published updated Level 1 and Level 2 SFRA. On 2 May 2024 the EA provided comments, including a request for additional clarification which was provided on 17 May 2024
- 1.11 On 18 July 2024, Council considered a report into the resumption of the Local Plan Inquiry which had previously been agreed by the Corporate Policy and Resources Committee on 8 July 2024. The report set out the recent response from the Environment Agency, and the options for deciding whether or not Council agreed a request for further Main Modifications to the Local Plan in order to resume the Examination hearings and progress the Plan to adoption. Council agreed the option to progress the local plan and officers have now requested this from the Inspector.
- 1.12 The NPPF policy states at para 48:

Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Section 38(6) the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan (unless material considerations indicate otherwise) and not in accordance with an emerging plan, although emerging policies may be a material consideration.

- 1.13 The following policies of the Pre-Submission Spelthorne Local Plan 2022 2037 are of relevance:
 - > ST1: Presumption in Favour of Sustainable Development
 - > ST2: Planning for the Borough
 - PS2: Designing Places and Spaces
 - > PS3: Heritage, Conservation and Landscape
 - > E3: Managing Flood Risk
- 1.14 At this stage, the policies in the Pre-Submission Spelthorne Local Plan carry limited weight in the decision-making process of this current planning application. The adopted policies in the 2009 Core Strategy and Policies DPD carry substantial weight in the determination of this planning application.

2. Relevant Planning History

2.1 The site has the following planning history:

Ref. No.	Proposal	Decision and Date
24/00626/CPD	Certificate of Lawfulness for the proposed use of the building as a children's day nursery (Class E(f)).	Granted 16.07.2024
20/00034/FUL	Erection of new building containing 5 flats, comprising 1 no. 2 bedroom unit and 4 no. 1 bedroom units incorporating car parking and cycle storage. New vehicular access through existing wall and brick up existing access. New pedestrian access	Grant Conditional 24.04.2020

	through existing wall. Extended parking area and alterations to existing riverside footpath Amendment to application no. 14/01096/FUL alterations to existing constructed 4 unit development to 5 units, accomplished with the internal subdivision of unit 4 to create additional unit 5.	
02/00938/FUL	Erection of a ramped access, provision of disabled parking spaces and internal alterations to provide a disabled w.c.	Grant Conditional 11.11.2002
02/00095/FUL	Conversion of building from Class B1 (Office) to Class D1 for use as a day nursery together with associated play spaces and parking and internal and external alterations and refurbishment of existing building.	Grant Conditional 28.03.2002

3. Description of Current Proposal

The application site and surrounding area

- 3.1 The application site is located on the eastern side of Moor Lane at a corner site close to its junctions with Wraysbury Gardens to the north and Wraysbury Road to the west. The site is occupied by a detached two storey (with a basement) Grade II Listed Building which had been used as offices since 1981 although is currently vacant. Originally, the building was the Staines West Railway Station which was the southern terminus of the Staines and West Drayton Railway until its closure in 1965. A Certificate of Lawfulness for the proposed use of the building as a children's day nursery (Class E(f)) was granted earlier this year.
- The site is located within the Staines Conservation Area and within the Zone 2 Flood Risk Area (1 in 1000 year event).
- 3.3 There is an existing parking area to the rear of the listed building and also an additional area of parking to the east of the retained wall that formed part of the railway station and the Wraysbury River, which is designated for use by occupiers of the application site.
- 3.4 The area is mixed in character with a mixture of commercial and residential uses and types and styles of properties.

Proposal

- 3.5 This planning application seeks both planning permission and listed building consent for internal and external alterations including new openings at lower ground level, access ramps and railings to create an external play area.
- 3.6 The internal alterations comprise widening, re-opening and closing various openings to facilitate better movement through the building to enable the use as a nursery. Additional/ altered toilets are proposed. Externally, to the listed building itself, four new door openings are proposed at basement level replacing non-original window openings and sections of wall below. To the rear of the hardstanding / parking area, two access ramps are to be provided to allow accessibility between the hardstanding and the entrance to the building itself. The play area is to be located at the southeast corner of the existing hardstanding / parking area abutting the existing wall to the east and the proposed ramps to the south and west. The enclosed play area will be completed by 1.2m high metal railings to the north.
- 3.7 The full set of proposed plans are provided as an Appendix.

4. Consultations

The following table shows those bodies consulted and their response.

Consultee	Comment
Conservation Officer	No objections.
Surrey CC Highways	No objection. Requested a parking user survey.
Environment Health - Contamination	Recommend conditions.
Head of Neighbourhood Services	Awaiting response – to be reported to the Committee

5. Public Consultation

- 5.1 A total of 15 properties were notified of the applications. A statutory site notice was displayed and a notice put in the local press.
- 5.2 The Council has received 4 letters of objection to the applications, from 3 separate addresses.
- 5.3 Reasons for objecting include:
 - Noise levels from play area
 - Loss of privacy
 - Loss of views
 - Access to Refuse Storage Area
 - Traffic flows
 - Access for delivery, catering and emergency vehicles
 - Insufficient parking

- Capacity of site at collection and drop off time
- Inappropriate location for a nursery
- Lack of space to manoeuvre vehicles / location of disabled space
- Anti-social behaviour in the locality

6. Planning Issues

- Impacts upon the Listed Building and the Staines Conservation Area.
- > Residential Amenity.
- Parking and Highway Safety.
- > Flooding

7. Planning Considerations

Background

7.1 The future use of the site as a children's day nursery does not require planning permission, as both the existing office use and the proposed nursery fall under Class E of the Use Classes Order. This has been lawfully confirmed by the issuing of a Certificate of Lawfulness for the use under 24/00626/CPD. Therefore, the only issues that are under consideration for these proposals are those that are related to the physical changes to the listed building and the hardstanding / parking area (not the use itself).

Impacts upon the Listed Building and the Staines Conservation Area.

- 7.2 There is a statutory duty placed on all local planning authorities by Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires authorities when, amongst other responsibilities, making decisions on planning applications in conservation areas that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'. In respect of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, in dealing whether to grant listed building consent the local planning authority "shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses." These requirements seek a positive aim of "preserving or enhancing character of conservation areas and preserving listed buildings." This duty has particular importance when considering and weighing all the issues in this case.
- 7.3 At Chapter 16 (Conserving and enhancing the historic environment) of the NPPF, Local Planning Authorities should consider the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 7.4 Policy EN5 of the Spelthorne Core Strategy and Policies Development Plan Document (CS&P DPD) for Buildings of Architectural and Historic Interest states the Council will seek to preserve it architectural and historic heritage by requiring alterations and extensions to listed to respect any features of special

historic or architectural importance and refusing consent for any alteration or extension to a listed building that will not preserve the building or its setting. The Policy also requires development proposals for any sites affecting the setting of a listed building to have special regard to the need to preserve its setting.

- 7.5 Policy EN6 of the CS&P DPD for Conservation Areas, Historic Landscapes, Parks and Gardens states the Council will seek to preserve and enhance the character of conservation areas by requiring the retention of buildings, trees and other features, including open spaces, views and vistas, which are important to the character of the area.
- 7.6 As required by the NPPF, the application has been submitted with a detailed Heritage Impact Assessment clearly setting out an assessment of the significance and setting of the heritage asset and the impacts that the proposals would have. It concludes that the proposals would have a low level of less than substantial harm, and that any less than substantial harm is mitigated by the proposed works and their positive impacts and benefits together with the public benefits of providing a nursery facility. Paragraph 208 of the NPPF states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.
- 7.7 The Council's Conservation Officer has not raised any objections to the proposals, stating that they 'will not harm the character of this listed building, which should have a long-term useful life in its new proposed use. There will also be no effects on the character of the Staines Conservation Area'.
- 7.8 The internal alterations will not be visible from the street scene, and the four new door openings are at basement / lower ground floor level and are located within lightwells limiting their visibility from the street scene. The ramps are located alongside existing raised areas to the building and are necessary to ensure inclusivity to the site and accessibility for prams/buggyies, etc. The railings are predominantly on one side of the proposed play area and are of a height, size and design that would not harm the character and appearance of the area.
- 7.9 Therefore, it is considered that the proposal would not result in any harm to the setting and appearance of the Listed Building and would preserve and enhance the Staines Conservation Area. The proposal is considered to comply with the NPPF (2023), Policies EN5 and EN6 of the Spelthorne Core Strategy and Policies Development Plan Document and is considered acceptable.

Residential Amenity

7.10 Policy EN1b of the CS & P DPD states that "

New development should achieve a satisfactory relationship to adjoining properties avoiding significant harmful impact in terms of loss of privacy,

- daylight or sunlight, or overbearing effect due to bulk and proximity or outlook."
- 7.11 The third-party representations have raised concerns regarding loss of privacy, loss of views, noise and disturbance from the use of the external play area as a children's nursery, and general noise and disturbance from traffic movements.
- 7.12 With regard to the use of the play area as a nursery, this is not a material consideration in assessing this proposal. The site including the area proposed as the play area has a lawful use as a children's day nursery and any issues surrounding the use are not a matter when assessing these proposals.
- As the area is already an area of hardstanding used primarily for parking, and the altered openings are at lower ground floor levels, it is not considered that there will be any adverse impacts with regard to any loss of privacy or any views. The play area will inevitably result in some noise as a result of its use. However, the area could be used as a play area in any event without permission. This proposal facilitates a secure and safe outdoor play area for children attending the nursery where outdoor areas are required as part of Ofsted requirements. In terms of traffic movements, there will be less than currently occurs as the introduction of a play area will reduce the number of spaces in this part of the site by 5 spaces with only one disabled space being provided in this area together with the five existing spaces for residents of the flats in Old Station Mews. Therefore, it is not considered that there will be any significant adverse impacts upon local residents in terms of noise and disturbance from traffic movements in this part of the site. The area of parking located to the east of the site near to the Wraysbury River will be retained for the use of the nursery for staff parking, and parents collecting and dropping off children. This is also an existing parking area and located behind a substantial wall that was formerly part of the railway station. It is not considered that this parking area which result in any significant harm to local residents above and beyond what already exists.
- 7.14 Therefore, no significant loss of privacy, overbearing or noise and disturbance is considered to arise, conforming to Policy EN1 of the CS&P DPD.

Parking and Highway Safety

- 7.15 The proposal would result in the net loss of five parking spaces. The proposal includes one disabled space adjoining the proposed play area and a further 12 spaces located on the existing car park to the east of the site adjoining the Wraysbury River. The Council's Parking Standards do not have a specific requirement for a children's day nursery. However, the closest comparison is considered to be that of a school. This would require 2 spaces per member of staff. The applicant has confirmed that at full capacity, the nursery would accommodate 23 staff and therefore the 13 spaces will meet this standard.
- 7.16 The retained car parking area to the east is existing with access onto Wraysbury Gardens and no specific highway safety concerns are considered to result from the use of this parking area. Similarly, the access to the site from Moor Lane is also existing and provides access to the disabled bay and

- the residents of Old Station Mews and with the reduction of five parking spaces in this area, is less than who can currently use this access.
- 7.17 The County Highway Authority (CHA) requested some additional information regarding pick-up and drop-off at the nursery. The applicant has confirmed that at full capacity the nursery can accommodate 80 children however the nursery is unlikely to be at full capacity at all times. They have also stated that 'It is anticipated that drop off and collection times will be split into 15 minute intervals over a course of one and a half hours, in both the mornings and the evenings, i.e. 10 time intervals. Accordingly, at maximum capacity and assuming 100% arrivals by private motor vehicle, a maximum of 8 no. vehicles would arrive in each interval. The on-site car parking facilities are, therefore, of ample size to accommodate these trips. Notwithstanding the CHA's request for a 'user survey', it is not considered reasonable to ask for one as the use of the building as a nursery is lawful and is not under consideration as part of these applications.
- 7.18 There will undoubtedly be pressures on the site at peak collection and drop off times. However, the applicant has stated that they will encourage members of staff to commute to work by public transport in view of the sustainable town centre location, and will stagger arrival and departure times for children at times of peak demand. It should also be noted that the use of the building and the parking areas as a children's nursery is established by the Certificate of Lawfulness. As such, the nursery could be put into use immediately and technically reserve the parking areas for staff only with users of the nursery having to find their own arrangements for dropping off and collecting children. Therefore, it is not considered that there are grounds to refuse the proposal on parking and highway safety grounds.

<u>Flooding</u>

- 7.19 Policy LO1 of the CS&P DPD seeks to reduce flood risk and its adverse effects on people and property in Spelthorne.
- 7.20 The only physical additions are the access ramps and railings to the play area on an existing hardstanding / parking area. The railings themselves have openings to allow the free flow of flood water.
- 7.21 The site is located within the Zone 2 Flood Risk Area. In view of the very limited amount of additions on existing hardstanding and the relatively low risk level in Zone 2, it is not considered that there are sufficient harmful impacts in terms of flooding to justify refusal.

Other Matters

7.22 The Council's Street Scene Officers are reviewing the access arrangements for the collection of refuse from Old Station Mews. Any comments will be reported orally to the Committee. Any anti-social behaviour in the locality is not a material planning consideration in assessing this proposal. The access for delivery and catering vehicles and emergency services are not considered to be significantly affected by the proposals compared to the existing arrangements. The proposal does not qualify for Biodiversity Net Gain. The

Council's Environmental Health Officer requested conditions regarding contaminated land on the basis that there may be some soft landscaping works proposed. The submitted plans do not show any landscaping and as such, it is not considered necessary or reasonable to impose any conditions in this regard.

Equalities Act 2010

7.23 This planning application has been considered in light of the Equality Act 2010 and associated Public Sector Equality Duty, where the Council is required to have due regard for:

The elimination of discrimination, harassment and victimisation; The advancement of equality of opportunity between persons who share a relevant protected characteristic and person who do not share it; The fostering of good relations between persons who share a relevant protected characteristic and person who do not share it; which applies to people from the protected equality groups.

Human Rights Act 1998

7.24 This planning application has been considered against the provisions of the Human Rights Act 1998.

Under Article 6 the applicants (and those third parties who have made representations) have the right to a fair hearing and to this end full consideration will be given to their comments.

Article 8 and Protocol 1 of the First Article confer a right to respect private and family life and a right to the protection of property, i.e. peaceful enjoyment of one's possessions which could include a person's home, and other land and business assets.

In taking account of the Council policy as set out in the Spelthorne Local Plan and the NPPF and all material planning considerations, Officers have concluded on balance that the rights conferred upon the applicant/ objectors/ residents/ other interested party by Article 8 and Article 1 of the First Protocol may be interfered with, since such interference is in accordance with the law and is justified in the public interest. Any restriction of these rights posed by the approval of the application is legitimate since it is proportionate to the wider benefits of such a decision, is based upon the merits of the proposal, and falls within the margin of discretion afforded to the Council under the Town & Country Planning Acts.

Financial Considerations

7.25 Under S155 of the Housing and Planning Act 2016, Local Planning Authorities are now required to ensure that potential financial benefits of certain development proposals are made public when a Local Planning Authority is considering whether or not to grant planning permission for planning applications which are being determined by the Council's Planning Committee. A financial benefit must be recorded regardless of whether it is material to the Local Planning Authority's decision on a planning application,

but planning officers are required to indicate their opinion as to whether the benefit is material to the application or not.

In consideration of S155 of the Housing and Planning Act 2016, the proposal for planning permission is not a CIL chargeable development and will therefore not generate a CIL Payment.

The proposal will generate Business Rate payments which is not a material consideration in the determination of this proposal.

Conclusion

7.26 Accordingly, both applications are recommended for approval.

8. Recommendation

- 8.1 GRANT planning permission for **24/01052/FUL** subject to the following conditions:
 - 1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason:-. This condition is required by Section 91 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

 The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan; E1000 rev B; E1100 rev B; E1101 rev B; E1102 rev B; E1190 rev B; E1199 rev B; E2000 rev B; EL101 rev P2; EL102 rev P2; PD101 rev P5; PD102 rev P5; PD103 rev P5 received on 02.09.2024

Reason:-.For the avoidance of doubt and to ensure the development is completed as approved.

3. No development above damp course level shall take place until details of the materials and detailing to be used for the external surfaces of the building, railings and surface material for the access ramps be submitted to and approved by the Local Planning Authority. The development shall then be constructed in accordance with the approved materials and detailing.

Reason:- To ensure that the proposed development does not prejudice the appearance of the listed building and Staines conservation area which is of high historic value, in accordance with policies EN5 and EN6 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

4. There shall be no raising of existing ground levels on the site within the area liable to flood, other than in accordance with the approved details.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction in flood storage capacity in accordance with policies SP1,

SP7 and LO1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

5. All spoil and building materials stored on site before and during construction shall be removed from the area of land liable to flood upon completion.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction of flood storage capacity in accordance with policies SP1, SP7 and LO1 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.

- 8.2 GRANT Listed Building Consent for **24/01053/LBC** subject to the following conditions:
 - 1. The development hereby permitted shall be begun before the expiration of three years from the date of this consent.

Reason:-. This condition is required by Section 18 of the Planning (Listed Building and Conservation Areas) Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

 The development hereby permitted shall be carried out in accordance with the following approved plans: Site Location Plan; E1000 rev B; E1100 rev B; E1101 rev B; E1102 rev B; E1190 rev B; E1199 rev B; E2000 rev B; EL101 rev P2; EL102 rev P2; PD101 rev P5; PD102 rev P5; PD103 rev P5 received on 02.09.2024

Reason:-.For the avoidance of doubt and to ensure the development is completed as approved.

3. No development above damp course level shall take place until details of the materials and detailing to be used for the internal materials, the external surfaces of the building, railings and surface materials for the access ramps be submitted to and approved by the Local Planning Authority. The development shall then be constructed in accordance with the approved materials and detailing.

Reason:- To ensure that the proposed development does not prejudice the appearance of the listed building and Staines conservation area which is of high historic value, in accordance with policies EN5 and EN6 of the Spelthorne Borough Core Strategy and Policies Development Plan Document 2009.