

**LOCATION:** FRIMHURST FARM, DEEPCUT BRIDGE ROAD, DEEPCUT, CAMBERLEY, GU16 6RF

**PROPOSAL:** The continued use of the existing Industrial Centre (Use Classes B1, B2 and B8) and movement between these uses as well as a revised access onto Deepcut Bridge Road. (Part Retrospective). (Additional Information rec'd 06/11/2015).

**TYPE:** Full Planning Application

**APPLICANT:** Mrs L Halford

**OFFICER:** Emma Pearman

## **RECOMMENDATION: REFUSE**

### **1.0 SUMMARY**

- 1.1 The application relates to the continued use of an industrial centre at Frimhurst Farm for flexible use classes B1, B2 and B8. The existing use of land and buildings at the site for industrial and employment purposes is currently unauthorised, notwithstanding Unit 5 and Compound F3 which have an agreed lawful use by virtue of Certificates of Lawful Development for Existing Use (SU13/0882 and SU13/0826 respectively). The application also seeks consent for a revised vehicular access onto Deepcut Bridge Road.
- 1.2 A similar application was previously refused in 2014, and this application differs in that trees which were proposed to be removed to make way for the access have now been cut down, further evidence has been provided in respect of the historic use of units to the west of F1 and further supporting information has been provided in terms of the economic contribution of the site to the wider economy.
- 1.3 The report again concludes that while the re-use of some buildings within the historic core of the site may be acceptable, overall the extent of the development harms the intrinsic character and rural landscape of the countryside and is therefore contrary to adopted policy.

### **2.0 SITE DESCRIPTION**

- 2.1 Frimhurst Farm is located between the settlements of Frimley Green and Deepcut within a rural location characterised by woodland and mature landscape features. The site is located to the west of Deepcut Bridge Road and is served by an access in close proximity to Deepcut Bridge to the south. It is located in Countryside Beyond the Green Belt as identified by the Proposals Map of the Surrey Heath Core Strategy and Development Management Policies Document 2012.
- 2.2 The site benefits from a long access that leads into the site approximately 90 metres away from the public highway. To the eastern edge of the site, in close proximity to the site access are fairly large warehouse buildings divided into business units. Beyond this area are large compound areas characterised by a large number of informal buildings including portacabins, shipping containers and other free standing structures. This area is also tenanted and as such divided into compound units characterised by a mixture of mesh wire and wood panel fencing. The commercial tenants store various types of building materials, machinery, scrap metal and other forms of industrial material.

- 2.3 The site access runs through the centre of the site and also serves Frimhurst Farm Cottages. The area surrounding the site is of a wooded rural character although the vegetation immediately surrounding the site is in poor form.

### 3.0 RELEVANT PLANNING HISTORY

- 3.1 The site was originally a farm with the agricultural buildings concentrated to the east and open fields to the west. In the 1990s the site was re-used for commercial purposes. Between 1998 and 2006 the site expanded significantly to the west with commercial activity. By 2009 further buildings had been erected and hardstanding laid and there was an associated intensification in site activity. Since 2009 the following applications have been received:
- 3.2 SU/09/0843 Formation of a driveway and access onto Deepcut Bridge Road
- Refused 07/06/2010 due to the adverse impact upon the character and setting of Basingstoke Canal Conservation Area and the wooded countryside location by providing an urbanising feature within the rural location.*
- Dismissed at Appeal APP/D3640/A/10/2141599*
- 3.3 SU/12/0809 Application for a Lawful Development Certificate for the existing Class B1 use of units 1, 1A, 2, 3, 4 and 8.
- Not Agreed 25/03/2012*
- 3.4 SU/13/0822 Application for a Lawful Development Certificate for the existing Class B1(c) use of unit 5.
- Agreed 24/01/2014*
- 3.5 SU/13/0826 Application for a Lawful Development Certificate for the existing Class B8 use of compound F3.
- Agreed 20/01/2014*
- 3.6 SU/14/0605 Application relating to the continued use of the existing Industrial Centre for use classes B1, B2 and B8 and movement between these uses as well as a revised vehicular access onto Deepcut Bridge Road
- Refused 18/11/2014 due to the impact of the areas west of compound F1 resulting in a proliferation and intensification of commercial uses and activity into former undeveloped land and having an adverse impact on the countryside; and, the proposed access would also be harmful to the countryside.*
- 3.7 In respect of 14/0605 an Enforcement Notice was served on the 30th October 2015 relating to the areas west of compound F1 and the applicant lodged an appeal which started on 7th December 2015.

## 4.0 THE PROPOSAL

- 4.1 The application proposes a retrospective change of use of the site to an industrial centre comprising B1 (business), B2 (General Industrial) and B8 (Storage and Distribution) uses. The applicant seeks a flexible permission allowing change of use between these three use classes. This submission seeks to overcome the reasons for refusing 14/0605 and the issuing of the Enforcement Notice.
- 4.2 In support of this proposal the applicant has submitted the following information:
- Planning, Design and Access Statement
  - Arboricultural Assessment, Method Statement and Tree Survey Plan
  - Flood Risk Assessment
  - Aerial photo from 2005 showing E compound areas
  - Further evidence in respect of E compounds including invoices, rental agreements, solicitors letters from 2004 onwards
  - Further evidence in respect of the D compounds from 2010-2011 including rental agreements and invoices
  - Further evidence in respect of the F1 area including invoices and letter to tenant.

This further evidence was not submitted at the time of the last application and the applicant has also included further information this time in the planning statement, in respect of the contribution of the site towards the local economy [*see paragraph 7.3.6*].

- 4.3 The proposal also includes the provision of a new access approximately 60 metres to the north of the existing access. This would be 4m in width, same as the existing access. The existing access close to the bridge would be closed, with the surface dug up and would be replanted. The applicant proposes that the existing access would be blocked up for a distance of approximately 15m from Deepcut Bridge Road, with the surface removed and would be planted with laurel and holly to match existing boundary vegetation. The applicant also proposes further planting along the sides of the proposed access within the site which would not be visible from the road. Since the previous application was submitted, the applicants have felled trees in the proposed location of the new access road.

## 5.0 CONSULTATION RESPONSES

- |     |   |  |
|-----|---|--|
| 5.1 | Surrey County Highway Authority             | No objection, subject to conditions.                           |
| 5.2 | Council's Arboricultural Officer            | No objection, subject to condition.                            |
| 5.3 | Surrey Wildlife Trust                       | Insufficient information provided to assess impact on ecology. |
| 5.4 | Council's Heritage and Conservation Officer | No objection.  |
| 5.5 | Basingstoke Canal Authority                 | No response received.  |

- 5.6 Mytchett, Frimley Green and Deepcut Society      Objection – all but lightest traffic has to come through the village, existing access and road inadequate although replacement access could lead to more development without planning permission, relaxation of existing use classes not welcome, site is now less sheltered because of removal of trees and extent of development over recent years.

## 6.0 REPRESENTATION

- 6.1 At the time of preparation of this report 22 letters of objection have been received, one petition with 151 signatures, and one letter in support of the application.

The issues raised in support of the application are as follows:

- Existing access is dangerous so close to bridge and new access will enable a much safer egress for those leaving Frimhurst Farm and users of existing railway bridge

The issues raised in objection to the application are as follows:

Impact on Countryside/location [see Section 7.3]

- Will destroy rural character of area
- Not appropriate to build road next to canal which is used for leisure purposes
- Use not consistent with its location next to an SSSI

Trees/Ecology [see Sections 7.5 (trees) and 7.8 (ecology)]

- Trees have been cut down which allow noise to travel further and have ruined landscape
- Tree felling has reduced habitat for wildlife
- Application states no trees should be removed as this has already taken place
- Biodiversity associated with canal will be put at risk by new road next to canal

Residential amenity [see section 7.6]

- Smoke from fires at the weekend [*Officer comment: nuisance in this regard should be reported to Environmental Health. Without planning permission there is no control over working hours at present*]
- Noise pollution from vehicles during working hours and outside working hours on Saturday and Sunday afternoons
- Will result in increased air pollution
- Will result in increased noise and vibration
- Lack of adherence to working hours [*Officer comment: as there is no existing planning permission then working hours are a matter for Environmental Health*]

- Insufficient tree cover to prevent local residents from being able to see the site

#### Highway Safety and Parking [see section 7.7]

- Will result in an unacceptable increase in heavy diesel commercial vehicles using Lake Road and adjacent routes
- Will result in increased road safety issues for pedestrians, cyclists, motorists and animals
- Will result in increased congestion on already congested roads and wear and tear
- Lack of suitable roads for heavy commercial vehicles
- No need for revised access, width restrictions on bridge have now slowed traffic considerably
- Reference to illegal track being used leading to Frimhurst Farm Cottages [*Officer comment: existing track is not illegal and can be used; it would be illegal to surface this track which has not happened*]
- Road has already been built [*Officer comment: there is a track leading to Frimhurst Farm cottages which is not the road proposed as part of the application*]
- Why is it necessary to have two roads; what will happen to old access road
- Proposals at RLC Barracks will already increase traffic

#### Other matters [Officer comment: not relevant to the consideration of this application]

- Disregard for concerns of official bodies; site has expanded illegally
- Deliberately expanded site without concern for visual, light, environmental and noise pollution
- Site has poor safety record; has been fires/explosions on site.

## **7.0 PLANNING CONSIDERATION**

7.1 The application is to be considered against policies within the Surrey Heath Core Strategy and Development Management Policies Document 2012, and in this case the relevant policies are CP1, CP2, CP8, CP11, CP14, DM1, DM9, DM11, DM13 and DM17. The National Planning Policy Framework (NPPF) is also a relevant consideration.

7.2 The main issues to be considered are:

- Impact on local economy and Countryside beyond the Green Belt;
- Highways, parking and access;
- Residential amenity; and,
- Other matters including heritage, ecology, flooding and drainage.

### **7.3 Impact on local economy and the Countryside beyond the Green Belt**

#### The existing use

- 7.3.1 Paragraph 17 of the NPPF states that core planning principles include conserving and enhancing the natural environment, recognising the intrinsic beauty and character of the countryside, and encouraging the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value.
- 7.3.2 Paragraph 5.6 of Policy CPA advises that development which causes harms to the intrinsic character, beauty, landscape diversity, heritage and wildlife of the countryside will be considered inappropriate. Policies CP2 and DM9 reflect this advice, indicating that development should respect and enhance the rural character of the environment.
- 7.3.3 Policy DM1 (Rural Economy) supports the re-use, adaptation or conversion of buildings for economic purposes, subject to 6 criteria. Criterion (iii) is of most relevance and this requires the scale and use of any diversification or economic purpose including cumulative impact to not conflict with wider countryside objectives. Moreover, supporting paragraph 6.14 of Policy DM1 recognises that conflicts between economic objectives and maintaining the character and function of the countryside can arise.
- 7.3.4 The application site began use as a farm until the early 1990s when commercial businesses began to operate from the site. The planning history shows how the buildings and compound areas to the east of compound area F1 largely form part of the historic core of the site, and Lawful Development Certificates are in place for F3 and Units 5A and 5B within this area. Planning application 14/0605 deemed that the commercial re-use of the agricultural buildings within the historic core of the site was acceptable, and once again this is considered to be the case.
- 7.3.5 However, again this submission also seeks planning permission for unauthorised extensions of compound areas west of F1, which were deemed harmful to the countryside under the 2014 refusal and now form part of an extant enforcement notice. Specifically, the commercial operations and associated buildings here include a mixture of informal, non-permanent buildings including portacabins and containers sited on areas of hardstanding which have been sectioned off by a mixture of corrugated metal, wire mesh and timber panel fencing to separate individual units which are separately tenanted (uses D5 –D7 and E1-E4). Given the materiality of the 2014 refusal and enforcement notice the applicant was advised during the course of this application to amend the submission in order to at least regularise the use of the historic core of the site. The applicant declined to do so.
- 7.3.6 This is because the applicant is keen to secure permission for the whole site, under one submission, so that funding can be secured; ensuring that they can plan for the future and invest into the site to upgrade and improve its appearance and function. With this submission the applicant has therefore provided further economic justification. According to the applicant, the site supports 42 businesses, employs 239 people and generates £16.5 million per year. It states that the vast majority of businesses at the site have local coverage and additional information submitted shows that the tenants at the site have

been located there for between 2 – 28 years. The applicant maintains that Frimhurst serves as a location for half of Deepcut's 84 businesses and so makes an important contribution to the local economy.

- 7.3.7 It is considered that the site does serve a useful purpose in terms of offering space from which local businesses can be based or store equipment etc. It has already been noted above, that the retention of Class B uses in the historic core of the site, is likely to be acceptable. Thus, the majority of the site would continue to contribute to the local economy. However, the site has incrementally and rapidly spread into the countryside without permission, with its boundaries extending further and further over time. This encroachment has cumulatively had a harmful impact on the rural and intrinsic characteristics of the countryside. The Council's aerial photography best illustrate this change. A line has to therefore be drawn and an enough and no more stance adopted.
- 7.3.8 The applicant argues that the natural boundaries of the site prevent it expanding any further, citing trees and fenced boundaries. Yet, it is noted that such boundaries have not prevented further encroachment into the countryside in the past and additionally whether or not it is able to spread further does not overcome the existing harm. Moreover, it is not clear why the areas to the west of F1 could not be accommodated elsewhere within the site closer to the historic core, or that the loss of these units to the west of F1 would have a significant detrimental impact on the economic viability of the site as a whole, given the large number of businesses accommodated and the large annual financial turnover of the site.
- 7.3.9 As such, the conclusions of 14/0605 still stand. It is considered that the economic justification does not outweigh the cumulative impact of the commercial development within the site which conflicts with the wider countryside objectives as set out in Policies CPA, CP2, DM1 and DM9 of the Core Strategy as well as the advice set out within the NPPF.
- 7.3.10 Further evidence has been submitted by the applicant specifically in relation to the areas subject to the enforcement notice. This includes tenancy records. Normally such evidence would be provided as part of a Certificate of Lawful Existing Use application, which in order to prove the use was lawful through the passage of time would have to demonstrate that the use had been continuous for a period of at least 10 years. Very limited weight has therefore been given to this evidence, but in any event in the officer's opinion this evidence does not sufficiently demonstrate that these areas are lawful. The Council's aerial photographs for the site also contradict this with there being a spread of commercial activity within the last 10 years with there being a significant change between 2006, 2009 and 2013.

#### Proposed access and trees

- 7.3.11 A previous application for the formation of an access to Frimhurst Farm Cottages to the north-west of the site was dismissed under appeal APP/D3640/A/10/2141599, and although serving a different site the Inspector's decision is relevant to this proposal given the similarities between the proposal and location of the proposed access road. The road proposed that was dismissed as part of the Appeal Decision did extend further to a distance of 300m, whereas the current access would extend approximately 73m westwards into the site from Deepcut Bridge Road and then a further 75m approximately south into the site to join with the existing access road. Parts of the Appeal Decision are still relevant, however, with the Inspector stating in paragraph 5 that:

*'...the first part would be a tarmac finish. It would break through, and result in clearance of, substantial vegetation alongside a stretch of road which has a pleasant rural appearance. The countryside character of the area imparts itself to most people by the attractive group effect of trees and bushes along this stretch of road, the fact that one can gauge this rural scene generally extends beyond the road edge and the absence of built form or hard surfacing in the vista around this point. The works would result in substantial and detrimental visual change and the natural feel of this immediate locality would be lost through an intrusive driveway. The entrance and first part would be particularly conspicuous but the whole development would penetrate and harmfully change the character of a considerable length of area of presently largely undisturbed and undeveloped countryside.'*

In his decision the Inspector did have regard to the fact that the trees were of low quality, stating in paragraph 7 that:

*'...I fully appreciate the nature of the surfacing, the lack of tree implications for most of the proposed drive's length and the fact that individually the trees that would be lost do not rank highly in arboricultural terms.'*

- 7.3.12 Since this appeal and the 2014 refusal the applicant has now felled trees in the location of the proposed access road. This is regrettable as it has further increased the damage and encroachment on this part of the countryside. While some trees have gone, it is still considered that the proposed location has a pleasant rural appearance from Deepcut Bridge Road and that the works would result in a substantial and detrimental visual change to the rural nature of this location, with the entrance and first part still particularly conspicuous as stated above. The creation of an access road may also put further pressure on the site for the loss of trees within the vicinity to accommodate larger vehicles.
- 7.3.13 To mitigate for the loss of trees and new access, the applicant proposes planting. The applicant states that the proposed additional planting will soften the impact and the amount of tarmac covering proposed has been reduced since the Inspector's decision. The Council's Arboricultural Officer has been consulted and has stated that although the trees lost were of low quality, the proposals in terms of new planting do not go far enough to compensate for the loss of trees. The proposed planting of the new access is again insufficient to suitably screen the site and it would have been expected that the existing access road would be dug up for a longer distance than is shown. The Council's Arboricultural Offer has advised that a comprehensive landscaping plan would be required.
- 7.3.14 Whilst a landscape scheme can be controlled by condition, it is considered that irrespective of this the siting of the road would be urbanising and harmful to the rural landscape. Although new planting may screen the site from the road to some extent over time, the proposed access would still open up the views of the commercial buildings and compound areas within the site, especially at first, detracting from the established rural character of the setting.
- 7.3.15 Furthermore, it should be noted that although the applicant proposes a width of 4m but a minimum width of 5.5m or passing places would be required by the County Highway Authority (see section 7.4 below) resulting in greater harm than the applicant proposes. Although it is noted that the proposed access would improve the visibility splays for vehicles leaving on site and the County Highway Authority have not objected, it is not considered that this can outweigh the adverse impact on the character of the countryside. Notably under appeal APP/D3640/A/10/2141599 the Inspector dismissed any highway safety benefits that the access would have provided, indicating that these factors could not



individually or cumulatively outweigh concerns in respect of the harm to the countryside. Neither is it considered that the creation of the new access would significantly benefit the economic viability of the site given its existing turnover.

- 7.3.16 As such, the proposed access would be harmful to the rural landscape and intrinsic character of the countryside contrary to Policies CPA, CP2, DM1 and DM9 of the CSDMP.

#### **7.4 Highway Safety and Parking**

- 7.4.1 Paragraph 32 of the NPPF states that planning decisions should take account of whether safe and suitable access to the site can be achieved for all people. Policy DM11 states that development which would adversely impact the safe and efficient flow of traffic movement on the highway network will not be permitted unless it can be demonstrated that measures to reduce such impacts to acceptable levels can be implemented.

- 7.4.2 Parking is already provided within the site and does not overflow onto Deepcut Bridge Road. Concern has been raised by objectors that the application would result in an increase of large vehicles on local roads, and associated safety concerns. However, no increase in traffic is proposed from the existing situation.

- 7.4.2 The County Highway Authority has been consulted and has undertaken an assessment of the likely net additional traffic generation, access arrangements and parking provision and is satisfied that the application would not have a material impact on the safety and operation of the adjoining public highway. This is subject to a condition which would require the road to be 5.5m in width or provide passing bays, rather than 4m as proposed. Another condition would be required for a scheme to close the existing access to be agreed in writing before development commenced, along with a number of informatives. It is therefore considered that the proposal is acceptable in terms of highway safety and parking complying with Policy DM11 of the CSDMP.

#### **7.5 Residential amenity**

- 7.5.1 Paragraph 17 of the NPPF states that planning decisions should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Policy DM9 states that development will be acceptable where it respects the amenities of the occupiers of neighbouring properties and uses. It is necessary to take into account matters such as overlooking, overshadowing, loss of light and an overbearing or unneighbourly built form.

- 7.5.2 The nearest neighbouring properties to the site are the residential property to the front of Frimhurst Farm, adjacent to the existing accesses and the Frimhurst Farm Cottages to the north. Further away are the homes on Lake Road, the other side of the Basingstoke Canal; the gardens of which lie over 70m from the northern edge of the site. The previous application 14/0605 found that the distances between the properties and the site would not have a significant adverse impact on the amenities of the occupiers of these properties, notwithstanding views into the site during the winter months. There has been nothing submitted as part of this application which would change that conclusion.

- 7.5.3 Concern has been raised locally about the noise and air pollution arising from the site, as well as working hours. The Environmental Health Officer has been consulted and has stated that the noise from the site would be noticeable but given the distance between the site and residential properties it would not exceed the maximum recommended levels. However, he has stated that noise from traffic movements could also be noticed and as such the applicant should have submitted a noise impact assessment. Therefore he

has recommended that if permission was granted, it should be on the condition that the impact of additional noise to residential properties is demonstrated by a noise impact assessment. In terms of working hours, these are controlled by the Control of Pollution Act 1974 and given that there are no existing permissions on the site the applicants are not in breach of any planning permission in this regard. However, the Environmental Health Officer has recommended a condition to restrict the hours of use for loading and unloading goods vehicles. In terms of Air Quality he has commented that pollution from road vehicles drops off quickly with distance from source and as such the impact would be minimal.

- 7.5.4 It is therefore considered that the proposal will not harm the residential amenities of local properties and as such the proposal is in line with Policy DM9.

## **7.6 Other matters**

- 7.6.1 Policy CP14A of the CSDMP seek to conserve and enhance biodiversity. The application site is approximately 120m south of a Site of Nature Conservation Importance on the northern side of Lake Road. Additionally, the Surrey Wildlife Trust has advised that the area where the access road is proposed is lowland mixed deciduous woodland which is a habitat of principle importance to biodiversity. Surrey Wildlife Trust has advised that the applicant has not provided sufficient information upon which to assess the implications of the planning application upon biodiversity within the locality. They have, however, stated that the proposed planting goes some way to address the risk of adverse effect to the ecological value of the site and provided a list of ecological recommendations that should be imposed if the proposed development to go ahead. On this basis it is considered that any future application for the access ought to be accompanied by an Ecological Assessment and an informative advising the applicant of this is recommended.

- 7.6.2 Policy DM10 of the CSDMP states that in order to manage flood risk, development within Flood Zone 1 on an area of 1ha or more will not be supported unless it can be demonstrated that the proposal would reduce risk to and from the development or at least be risk neutral. Although the applicant has submitted a Flood Risk Assessment, this considers only the impact of the proposed access road. However, given that it is within Flood Zone 1 and there are no known issues regarding flooding, this is considered to be acceptable. The applicant has stated that run-off from the hardstanding for the access road would be directed to the woodland by the incline of the new access and topography of the land. As such, it is considered the proposal would comply with the intent of Policy DM10.

- 7.6.3 Policy DM17 of the CSDMP states that development which affects any Heritage Asset should first establish and take into account its individual significance, and seek to promote the conservation and enhancement of the Asset and its setting. The proposal is close to the Basingstoke Canal Conservation Area, which is located approximately 55m to the north. The Council's Heritage Officer has been consulted however has not objected stating that the proposed access to the north would not harm the setting of the conservation area.

- 7.6.4 Class B uses are not CIL liable and as such the proposal is not required to contribute towards infrastructure or other development funded by CIL.

## **8.0 CONCLUSION**

- 8.1 It is considered that while the site does contribute to the local economy and the re-use of buildings within the historic core may be acceptable, the proliferation of compound areas and the creation of a new access in the countryside would harm its intrinsic character, beauty and landscape quality and is therefore inappropriate and fails to meet the objectives of Policies CPA, CP2, DM1 and DM9 of the CSDMP.

## **9.0 ARTICLE 2(3) DEVELOPMENT MANAGEMENT PROCEDURE (AMENDMENT) ORDER 2012 WORKING IN A POSITIVE/PROACTIVE MANNER**

In assessing this application, officers have worked with the applicant in a positive and proactive manner consistent with the requirements of paragraphs 186-187 of the NPPF. This included the following:

- a) Provided or made available pre application advice to seek to resolve problems before the application was submitted and to foster the delivery of sustainable development.
- b) Provided feedback through the validation process including information on the website, to correct identified problems to ensure that the application was correct and could be registered.

### RECOMMENDATION

REFUSE for the following reason(s):-

1. The proposed development by reason of the compound areas created to the west of compound F1 (comprised of hardstanding, wire mesh fencing and industrial storage of materials and containers) results in a proliferation and intensification of commercial uses and activity that encroaches into former undeveloped land and has an adverse impact on the rural and intrinsic character of the countryside, contrary to the objectives of the countryside as set out in Policies CP1, CP2, DM1 and DM9 of the Surrey Heath Core Strategy and Development Management Policies as well as the policies contained within the National Planning Policy Framework 2012.
2. The proposed access by reason of its urbanising and intrusive design and siting within a rural location would have an adverse impact on the rural landscape and intrinsic character of the countryside. This visual harm would not be offset by the stopping up of existing access and would therefore be contrary to the objectives set out in Policies CP1, CP2 and DM1 and DM9 of the Surrey Heath Core Strategy and Development Management Policies as well the policies contained within the National Planning Policy Framework.