2016/0840 Reg Date 12/10/2016 Windlesham

LOCATION: ERLWOOD MANOR, LONDON ROAD, WINDLESHAM, GU20

6PG

PROPOSAL: Erection of single storey building to provide restaurant and

support services for existing business premises. (Amended & Amended Plans - Rec'd 07/12/2016). (Additional and Drainage

Strategy Information - Rec'd 27/01/2017). (Additional

Information rec'd 21/02/2017).

TYPE: Full Planning Application

APPLICANT: Mr Wheeler

Eli Lilly & Company Limited

OFFICER: Michelle Fielder

RECOMMENDATION: GRANT subject to conditions

1.0 SUMMARY

- 1.1 This application seeks planning permission for a standalone ancillary restaurant / café building to service on site staff welfare requirements for an established employment site in the Green Belt.
- 1.2 The report notes the proposal would give rise to a 49% increase in floor area above that which was granted for a similar building granted planning permission in 2009; however the proposal is not considered to be inappropriate development in the Green Belt by virtue of the fact it constitutes the limited infill of a previously developed site. It is also noted that the site is occupied by a leading research and development company whom employs over 600 staff from the site. No objection is raised in relation to any material consideration addressed in the report and the application is recommended for approval.

2.0 SITE DESCRIPTION

- 2.1 The application site is occupied by Eli Lily and is located between the settlements of Bagshot, Windlesham and Ascot. The site entrance is within 2 miles of junction 3 of the M3. The site is accessed from the A30 and the site campus extends to approximately 16ha.
- 2.2 The site comprises a mix of open grassland, formal garden area, mature woodland and a significant number of buildings located primarily in the centre of the site. The buildings on site are primarily two and three storey in height and include Erl Wood Manor, an unlisted Victorian building which has been extensively extended.
- 2.3 The proposed siting for the development is between a number of existing buildings and on the footprint of the restaurant / café building approved in 2009. As detailed elsewhere in this report this application is extant and that building can be built.

3.0 RELEVANT HISTORY

- 3.1 The application site has a fairly extensive planning history however the following application are particularly relevant to this application:
- 3.2 00/0883 Outline application for the erection of a part three part four storey research laboratory building with ancillary accommodation, a part three part two storey administration support building, a gatehouse together with rationalisation of existing car parking to include decked car parking following demolition of existing product development building, solvent store and other small ancillary buildings.

Approved (05/08/2002), known as "the Masterplan".

3.3 02/0994 Part reserved matters to comprise Phase 1 of the development approved in outline reference SU/00/0883, namely:- part of the research laboratory building (west of existing main building complex); energy compound (adjacent to existing); delivery dock and linking corridor (north west of existing main building complex); and decked car park, together with associated turning area, amendments to entrance road and visitor parking spaces.

Approved (31/10/2002), known as "Phase 1".

3.3 05/0447 Erection of a two storey laboratory building with basement level and a single storey gatehouse.

Approved (07/03/2006), known as "Phase 2".

3.4 09/0275 Erection of a two-storey office building and a single storey staff restaurant building following the demolition of an existing single storey laboratory building and a two-storey temporary office building. The application included the removal of a large area of hard surfacing used for parking and the landscaping of that area of the site.

This application was considered to be similar to that approved by the masterplan application approved under 00/0883. This application remains extant with all but the restaurant building having been implemented.

3.5 09/0275/1 Non Material Amendment - This NMA sought to add a condition listing the approved plans for the restaurant building approved in 09/0275 and in doing so rectify a discrepancy in the elevation plans which show that the overall height of this building is circa 3m as opposed to section plans which showed a height of 6m. *This NMA was approved.*

4.0 THE PROPOSAL

4.1 This application is seeks to amend the scale of a staff building approved in 2009. The revised proposal would be located in the same location on the site. The dimensions of the approved building and now proposed are given in the table below. The 2009 permission appears to have been lawfully implemented and the office building which was approved at the same time has been built.

4.2		Restaurant building approved in 2009	The current proposal	The increase
	In m²		1,196 (with outdoor seating area of 343m²)	395m² or 49%
			` •	No overall height increase across most of the building itself.

- 4.3 The proposed floor plans show that the building would function as a hub within the campus and provide the usual back and front of house facilities needed to function as a staff café / restaurant (up to 200 covers) while its design is stated as allowing for spontaneous working and social interaction.
- 4.4 The submitted documentation advises that the design is based upon that of the existing buildings on site with design cues taken from the existing materials and shapes while giving the building the character of a sculpture.
- 4.5 The proposed development includes a covered walkway to link this building to others on campus. This feature would be comprised of 2.8m high galvanised steel frame posts with a recessed light from which a frameless toughened glass canopy would be suspended. This would be sited above a block paved path and would not have enclosed sides. A bin store and substation are also proposed.
- 4.6 The submitted planning statement advises that Eli Lilly is an international pharmaceutical company with offices, research centres and production facilities worldwide. Eli Lilly and Company Limited (Lilly) is the UK affiliate and has been located at Erl Wood for over 45 years. The site is the focus for its UK research and development activity and plays a vital role in Lilly's world-wide research and development activities. There are currently approximately 645 staff at Erl Wood.
- 4.7 The statement adds that operations at the Erl Wood site have grown over the years as Lilly has invested in new and additional facilities. The development undertaken at the site since 2002 has been part of a phased expansion of the site as set out in the grant of planning permission ref 00/0883 for a total of 15,255m2 of B1 space. While larger than the extant permission granted in 2009, this latest application is part of this planned expansion.

5.0 CONSULTATION RESPONSES

- 5.1 Surrey County No objection subject to conditions. Highway Authority
- 5.2 Arboricultural Officer Comments awaited.

5.3 Surrey Wildlife Trust No objections – suggest conditions.

5.4 LLFA No objection subject to conditions.

5.5 Windlesham Parish Queried whether this is inappropriate development in the Green Council Belt and whether the building is in context with other buildings on

the site.

6.0 REPRESENTATION

At the time of preparation of this report no letters of objection or support have been received.

7.0 PLANNING CONSIDERATION

- 7.1 Policies in the National Planning Policy Framework (NPPF); and, Policies CPA, CP2, CP8, CP11, CP14A, DM1, DM9, DM10, DM11 and DM13 of the Surrey Heath Core Strategy and Development Management Policies 2012 (CSDMP) are relevant. Regard will also be had to advice contained in the Planning Practice Guidance (PPG).
- 7.2 At paragraph 2.4.1 of the planning statement the applicants advises that the main use of the site is B1 offices. This being the case the remit of Policy DM13 of the CSDMP applies. This policy recognises that employment development can occur outside of the core employment centres and this policy's supporting text acknowledges that these uses can play an important role in the Borough's economy and often comprise large bespoke sites not just confined to the urban area but also located in the Green Belt and countryside. Whilst the policy seeks to retain these uses, the policy restricts development on these sites to extensions or additions and promotes redevelopment where this would improve environmental and residential amenity. In principle, therefore, and given the site's established use there is no objection to the principle of development on this site, subject to the merits of the proposal not causing material harm. As such, the following main issues need to be addressed in determining this application:
 - Green Belt appropriateness and harm;
 - Impacts on the character of the area, landscape and trees;
 - Highway impacts;
 - Impacts on residential amenity;
 - Impacts on biodiversity;
 - Other matters; and,
 - Very Special Circumstances.

7.3 Green Belt appropriateness and harm

- 7.3.1 Paragraph 89 of the NPPF states that the construction of new buildings are inappropriate in the Green but lists exceptions including limited infilling of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Paragraph 90 states that certain other forms of development are also not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. This includes engineering operations.
- 7.3.2 In light of the existing site coverage it is considered the proposed siting of the restaurant building and combined substation / bin store comprises part of the central core of the wider site and can be considered to be previously developed land with the proposed buildings being infill to the existing built form. This siting would also serve to contain the built form such that it did not extend out on to undeveloped areas while the height would largely be masked by the height of adjacent buildings. Accordingly it is considered the proposed development reasonably fulfils the exception cited at bullet point 5 of paragraph 89 of the NPPF in that it constitutes the limited infill of previously developed land which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.
- 7.3.3 In the planning statement the applicant team provide an additional view that the proposed development could be considered as an extension to the building approved in 2009. In this respect it is considered this permission remains extant and that the restaurant building could be constructed and that this constitutes a fall-back position; however it is not accepted that the proposed building can be considered as not being inappropriate development due to it being an extension or alteration to an existing building, as, quite simply the building does not presently exist.
- 7.3.4 The proposed covered walkway would constitute an engineering operation and such works, can, as set out at paragraph 90 of the NPPF be considered to be not inappropriate provided they do not conflict with the purposes of including land in the Green Belt. This assessment is one of planning judgement and different conclusions are likely for different sites and different proposals. However having regard to the existing site coverage and the lightweight form of this aspect of the proposal it is not considered the development would conflict with the purposes of including land in the Green Belt.
- 7.3.5 Given that it is concluded that the development is not inappropriate development in the Green Belt it has not been necessary to consider whether a case of very special circumstances is present. However, in the event that the committee conclude differently for any aspect of the proposal this will be assessed at section 8 of this report. It is also important to note that in the event the committee concludes that the development proposal is inappropriate development, but that very special circumstances are present to justify the grant of planning permission, the matter would need to be referred to the Secretary of State due to the floor space exceeding 1,000m² and the site being in the Green Belt.

7.4 Impacts on the character of the area, landscape and trees

7.4.1 The NPPF requires development to integrate into its natural, built and historic environments and Policy DM9 (ii) of the CSDMP reiterates this requiring development to respect and enhance the environment, paying particular attention to scale, materials, massing, bulk and density.

- 7.4.2 The proposed buildings would be located towards the centre of the site within an area that is currently largely surrounded by buildings. The development proposed would have limited visibility from any public vantage point and would have little impact on the character or the appearance of the surrounding area. The design proposed and the conceptual nature of the building being designed as a sculpture is unlikely to be to everyone's taste; however there is no denying this would provide a bespoke and high quality design. The siting of the proposed building between existing development would limit views of it from outside of the site and it is considered the building itself would not appear incongruous against the back drop of the existing buildings.
- 7.4.3 The location of the proposed building has already largely been cleared as a result of the works to implement the 2009 permission. The proposal would however entail the felling of 2 further trees. The Arboricultural Officer's comments are awaited; however it considered unlikely that the removal of these trees would harm the site's landscape quality or profile, moreover it is considered mitigation planting could be secured to off set this loss.
- 7.4.4 The proposed covered walkway would extend the existing network; however this would have limited impact beyond the immediate environs and the lightweight and largely transparent cover and framework would be sympathetic to its surroundings.
- 7.4.5 The proposal also details landscaping to supplement the retained green and verdant character of the site. This is considered acceptable.
- 7.4.6 In summary and subject to suitable conditions it is considered that the proposal would not harm the character or appearance of the area in compliance with Policy DM9.

7.5 Highway impacts

- 7.5.1 The applicant has advised that the proposed development will not increase the number of staff at the site and as a consequence it will be unlikely to give to rise to an increase in the level of vehicle movements to or from the site. Moreover, following the approval of the Masterplan Eli Lilly implemented a Travel Plan and the applicant has advised that they will continue to maintain and develop the Travel Plan with the aim of reducing the reliance on the private car as a means to access the site. The decked car park which formed part of the Masterplan has been completed and there are currently 570 parking spaces on site. The total level of parking is limited by the Masterplan consent and it is not proposed to increase the level of parking available which is considered to be appropriate to serve the site.
- 7.5.2 The Highways Authority has reviewed the current application and raised no objection and do not have any requirements. It is noted that £204,000 contribution for highway improvements (to the junction of B3020 with the A30) has previously been secured with the final payment of £104,00 was paid upon commencement of the approved office building pursuant to application 09/0275. The current application is not CIL liable (see paragraph 7.8.2) and it is not considered a highways objection can reasonably be raised, as such the application is considered to be compliant with Policy DM11 of the CSDMP 2012.

7.6 Impacts on residential amenity

7.6.1 The proposed building would not be closer to any neighbouring residential property than existing development on the site and the proposal development would not give rise to an increase in staff numbers. As such it is considered that the proposal would not result in adverse loss of residential amenity and would comply with Policy DM9 (iii) of the CSDMP.

7.7 Impacts on biodiversity

- 7.7.1 Policy CP14 of the CSDMP seeks to conserve and enhance biodiversity and does not permit development that would result in harm to or loss of features of interest for biodiversity.
- 7.7.2 The application is supported by a bat activity survey report which indicates that at least six species use the site. This is a greater diversity of species than found in the previous studies. The report makes recommendations in respect of bat boxes and lighting. This has been reviewed by SWT as the Council's retained ecology advisor and no objection raised subject to conditions. A badger survey has also been provided at the request of officers and comments are sought from West Surrey Badger Group on this document. Any comments and recommendations form this group will be reported by way of an update. Subject to no objection being raised it is considered the proposed development would not conflict with Policy CP14.

7.8 Other matters

- 7.8.1 Given that the site lies outside the floodplain and is under 1ha in size no flood risk assessment is required. However, in respect of surface water drainage in April 2015 the government changed requirements for major developments for sustainable drainage systems (SuDS). Under these requirements the Council must be satisfied during determination of the application that SuDS can be designed into a proposal, unless demonstrated to be inappropriate.
- 7.8.2 The application is not CIL liable because CIL only applies to residential or retail uses. Furthermore, in line with paragraph 204 of the NPPF planning obligations should only be sought where they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. No such requirements have been identified. For advice however, the 2009 permission secured a highways contribution of £104,000 towards highway improvements and this was paid in full.

8.0 VERY SPECIAL CIRCUMSTANCES

8.1 For the reasoning outlined in paragraph 7.3 above in the officer's opinion the development proposed is not inappropriate development in the Green Belt and as a consequence a case of VSC is not necessary. However, in the event Members conclude differently it is considered the matters detailed below carry weight and cumulatively amount VSC to outweigh the harm to the Green Belt which would otherwise arise.

The applicant's main very special circumstances to justify the development are summarised below, the merits of each will be considered in turn and then in combination:

- (i) The UK's pharmaceutical research and development sector is of national importance and a key part of the knowledge based industries
- (ii) The legacy of Eli Lilly being set up in the 1930's with occupation of the site since the 1960's
- (iii) Eli Lilly is a global company which has invested heavily in the current site and demonstrated a commitment to it

- (iv) Key to the continued operation is the retention and recruitments of top staff and scientists whom expect and are provided with accommodation of the highest standard
- (v) The proposal represents the last phase of the approved, 2002, masterplan
- (vi) Eli Lilly is therefore in a sector of importance and significance to the development of the regional and national economy

8.2 Assessment

- 8.2.1 The NPPF has a presumption in favour of sustainable development of which there are three dimensions i.e. economic, social and environmental. The economic role is 'contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.' In order to deliver a strong and competitive economy paragraphs 18-20 of the NPPF states the following:
 - 18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meet the twin challenges of global competition and of a low carbon future.
 - 19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore <u>significant weight</u> [Officer's underlining] should be placed on the need to support economic growth through the planning system.
 - 20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.
- 8.2.2 As part of building a strong and competitive economy, paragraph 21 of the NPPF encourages planning positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. The applicant's desire to provide improved facilities on an existing employment site is therefore consistent with the NPPF.
- 8.2.3 At a local level the Council's 2020 Economic Development Strategy recognises the importance of specialist engineering firms and aims to support their growth aspirations. In context of this application it is noted that the proposal does not aim to support job creation but instead is focused on providing improved facilities. It must also be noted that any VSC must also take into account the fall back position; namely that the building approved in 2009 could be built at any time. In this context the question is whether there are VSC present to outweigh the additional harm which would arise from the increase in size proposed.
- 8.2.4 In the officer's opinion the combined weight of these very special circumstances marginally outweigh the harm to the Green Belt which would otherwise arise if planning permission were granted.

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.
- c) Have negotiated and accepted amendments to the scheme to resolve identified problems with the proposal and to seek to foster sustainable development.
- d) Have proactively communicated with the applicant through the process to advise progress, timescale or recommendation.

10.0 CONCLUSION

10.1 It is considered the proposed development is not inappropriate development in the Green Belt. If however Members conclude differently the matters set out at section 8 of this report are considered to amount to a case of very special circumstances to justify the grant of planning permission. No objection is raised to the development on character, highway, amenity or ecological grounds and it is recommended planning permission is granted.

11.0 RECOMMENDATION

GRANT subject to the following conditions:-

- 1. The development hereby permitted shall be begun within three years of the date of this permission.
 - Reason: To prevent an accumulation of unimplemented planning permissions and in accordance with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.
- 2. The development hereby approved shall be undertaken in accordance with the details agreed pursuant to condition 7 of planning permission ref: 09/0275 unless otherwise agreed in writing by the Local Planning Authority prior to the commencement of any works in relation to the development hereby approved.
 - Reason: To ensure that satisfactory measures are put in place for addressing contamination issues before and during development in accordance with Policies CP2 and DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF.

3. The development hereby approved shall be constructed in external materials as detailed on the submitted plans and as specified at question 9 of the application form.

Reason: To ensure a satisfactory form of development in accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF 2012.

- 4. Prior to the commencement of any development the following details shall be submitted to and approved in writing by the local planning authority:
 - Results of in-situ ground investigations / soakage tests to confirm that infiltration SUDS are not suitable for the site:
 - Details of how the sustainable drainage systems will cater for system failure or exceedance event both on and off site; and,
 - Details of how the Sustainable Drainage System will be protected and maintained during the construction of the development.

Reason: To ensure a satisfactory form of development in accordance with Policy DM10 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF 2012.

5. Prior to the first use of building hereby approved a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority in writing to demonstrate that the Sustainable Urban Drainage System has been constructed in accordance with the approved scheme.

Reason: To ensure a satisfactory form of development in accordance with Policy DM10 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF 2012.

6. The development hereby approved shall only be undertaken in accordance with the recommendations contained within the submitted Bat Activity Survey Report.

Reason: To ensure the ecological and biodiversity value of the site is not harmed in accordance with PolicyCP14 of the Surrey Heath Core Strategy and Development Management Policies 2012, the NPPF 2012 and the Natural and Rural Communities Act 2006.

- 7. In order the implementation of this permission does not harm common reptiles:
 - all clearance works shall be undertaken when common reptiles are likely to be fully active (April to September).
 - clearance of logs, stones, rocks or piles of debris shall be undertaken by hand.
 - Clearance of tall vegetation shall be undertaken using a strimmer or brush cutter with cuttings raked and removed the same day. Cuttings will only be undertaken in phased way which may include either:

- Cutting vegetation to a height of less than 30mm, clearing no more than one third of the site in anyone day; or,
- Cutting vegetation over three consecutive days to a height of no less than 150mm at the first cut, 75mm at the second cut and 30mm at the third cut.
- Following removal of tall vegetation using the methods outlined above, remaining vegetation will be maintained at a height of 30mm through regular moving or strimming to discourage common reptiles from returning.
- Ground clearance of any remaining low vegetation (if required) and any ground works will only be undertaken following the works outlined above.
- Any trenches left overnight will be covered of provided with ramps to prevent common reptiles from becoming trapped.
- Any building materials such as bricks, stones etc will be stored on pallets to discourage reptiles using them as shelter. Any demolition materials will be stored or similar containers rather than in piles on the ground.
- Should any common reptiles be discovered during construction which is likely to be affected by the development, works will cease immediately. The developer will then seek the advice of a suitably qualified ecologist and works will only proceed in accordance with the advice they provide.

Reason: To ensure the ecological and biodiversity value of the site is not harmed in accordance with PolicyCP14 of the Surrey Heath Core Strategy and Development Management Policies 2012, the NPPF 2012 and the Natural and Rural Communities Act 2006.

8. Prior to the commencement of development a precautionary working method statement to demonstrate how the development is to proceed in a manner which will avoid killing, injuring or disturbing great crested newts shall be submitted to and approved in writing by the Local Planning Authority. The development shall proceed in accordance with the approved details.

In the event great crested newts are identified within the site before or during the course of the development works must cease and the Local Planning Authority be contacted.

Reason: To ensure the ecological and biodiversity value of the site is not harmed in accordance with PolicyCP14 of the Surrey Heath Core Strategy and Development Management Policies 2012, the NPPF 2012 and the Natural and Rural Communities Act 2006.

9. The development hereby approved shall only be undertaken in accordance with Erl Wood Badger Survey 2016 and the accompanying plan.

Reason: To ensure the ecological and biodiversity value of the site is not harmed in accordance with PolicyCP14 of the Surrey Heath Core Strategy and Development Management Policies 2012, the NPPF 2012 and the Natural and Rural Communities Act 2006.

10. Prior to any works associated with the refuse area being commenced details comprising a floor plan, elevation plans, roof plan (all to a recognised scale and having a scale bar upon them) and external materials shall be submitted to and approved by in writing by the Local Planning Authority.

Reason: To ensure a satisfactory form of development in accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012 and the NPPF 2012.

11. No development shall take place until full details of soft landscaping works have been submitted to and approved in writing by the Local Planning Authority and these works shall be carried out as approved, and implemented prior to first occupation.

The submitted details should include details of the new planting to be carried out and shall make provision for the two trees felled to facilitate the development.

All hard and soft landscaping works shall be carried out in accordance with the approved details. All plant material shall conform to BS3936:1992 Parts 1-5: Specification for Nursery Stock. Handling, planting and establishment of trees shall be in accordance with BS 8545:2014 Trees: from nursery to independence in the landscape.

Any trees or planting that, within a period of 5 years from the date of planting, dies, becomes damaged, diseased or is removed shall be replaced in kind.

Reason: To preserve and enhance the visual amenities of the locality in accordance with Policy DM9 of the Surrey Heath Core Strategy and Development Management Policies 2012.

12. No mezzanine or first floor shall be installed in the restaurant building hereby approved. In addition the sides of the covered walkway shall not be enclosed at anytime.

In all regards the development hereby approved shall be built and retained in accordance with the approved plans ref:

A-SC001 Rev 2

A-TP(00)005 Rev 3

A-TP(00)006 Rev 3

A-TP(00)007 Rev 1

A-TP(10)001 Rev 2

A-TP(11)001 Rev 2

A-TP(11) 002 Rev 2

A-TP(11) 003 Rev 3

A-TP(12)001 Rev 2 A-TP(12)002 Rev 2

A-TP(27)001 Rev 2

A-ST(68)001 Rev 1

A-TP(68)001 Rev 2

Reason: For the avoidance of doubt and in the interest of proper planning and as advised in ID.17a of the NPPG.

13. The development hereby approved shall be used only in an ancillary capacity to the lawful use / occupier of the site and shall not be used in any separate or independent use to that primary lawful use.

REASON: In the interest of ensuring a sustainable and not inappropriate form of development and to accord with Policy DM11 of the Core Strategy and the wider policy objectives of the NPPF 2012.