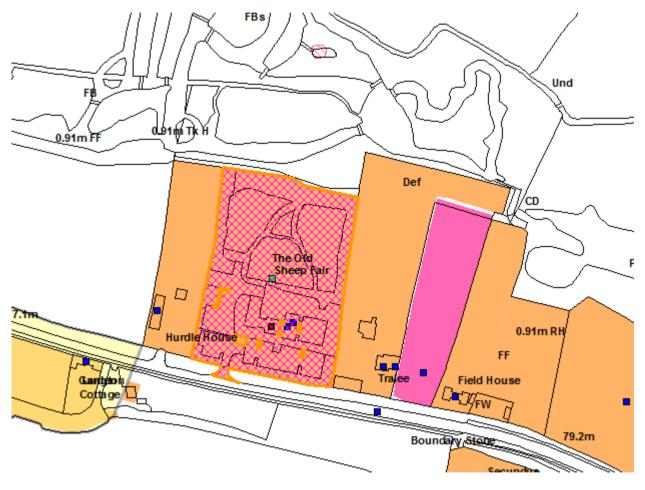
Case No: Proposal Description:	19/00619/FUL Variation of condition 2 of planning permission 13/02145/FUL (Amended).
Address:	Old Sheep Fair, The Long Barn Bishops Sutton Road Alresford SO24 9EJ
Parish, or Ward if within	New Alresford
Winchester City:	
Applicants Name:	C/O Gillings Planning
Case Officer:	Verity Osmond
Date Valid:	11 April 2019
Recommendation:	Approval



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General Comments

The application is reported to Committee due to the number of public comments received in objection to the application which is contrary to the recommendation for approval.

The proposed wording of condition 2 was amended on 1st July 2019 to read as follows: The amendments are to part (g) and part (i). Part g of the condition has been revised to clarify the percentage floor area to be occupied by the café. Part i of the condition has also been revised to include the percentage floor area of additional goods. The 'and associated items' has been removed from part (i) for clarity and to ensure the condition is enforceable in the future.

The storage area, mail order office and general sales area hereby approved shall only be used for the sale, storage and distribution of the following items;

a) Trees, lavender plants and plants of all kinds, dried and fresh cut lavender, wreathes and associated items;

b) Long Barn by-products (products made using Long Barn botanical ingredients, oils and extracts);

c) Composts, peats and other goods associated with plant/garden care;

d) Pots and containers of all kinds;

e) Traditional garden sundries including hand tools, tools, raffia, twine, gloves, aprons, baskets, rugs, cloches, plant supports, obelisks, ornaments, and associated items;

f) Seeds and bulbs, dried, artificial and cut flowers and goods associated with their care and maintenance;

g) Ancillary indoor and outdoor seating for the serving of refreshments which shall comprise no more than 17% of the total space available at ground floor level as defined as the coloured zones on Drawing LB001.

h) Space for workshops or events, limited to no more than 15 workshops in any calendar year

i) Homewares, food and drink, gifts and cards, stationery, clothing, jewellery, garden wildlife and dog care products which shall comprise no more than 8% of the total space available at ground floor level as defined as the coloured zones on Drawing LB0001.

Site Description

The application site is located on the northern side of Bishops Sutton Road. To the east of the site is New Alresford Town Centre and to the south west is the village of Bishops Sutton. The site is approximately 1.2 hectares in area with the land sloping away from the road towards the rear of site and Old Alresford Pond.

The existing barn on the site is used as a garden centre which has been operational since 2009. There is a single vehicular access to the site from Bishops Sutton Road with parking to the front of the barn which is set behind a row of hedging to the road frontage.

Proposal

The proposal seeks to vary condition 2 of 13/02145/FUL to regularise the current operation by authorising the sale of additional products and for the size of the café area to accurately reflect the current operation on site.

The applications seeks to authorise the sale of homewares, food and drink, gifts and cards, stationery, clothing, jewellery, garden wildlife and dog care products and expand the café seating area to 17% of the total retail floorspace.

Relevant Planning History

97/00089/FUL- Market garden for produce, horticulture together with the erection of a facilities building with sales area, 1 no greenhouse and 6 no polytunnels and associated parking - Refused 29/05/1997 - Appeal Allowed 18/11/1997.

01/02355/FUL- Market garden for produce, horticulture, together with the erection of a facilities building with sales area, 1 no. greenhouse and 6 no. polytunnels (renewal of planning permission W06446/02) - Permitted 09/01/2002.

09/00899/FUL - Variation of condition 5 of planning permission W06446/03 (Design and Access Statement and Appendices updated on web site 11.06.2009) - Land Adj Hurdle House Bishops Sutton Road Alresford Hampshire - Application Permitted - 29/09/2009

10/02580/FUL- Construction of a mixed-use facilities building (410 sq m GEA) comprising sales area (Class A1 - 190 sq m net), two treatment rooms (Class D1 44 sq m net), gallery/events/meeting space (Sui Generis - 36 sq m net), kitchen, office space, plant room, storage, toilets and lift; external display/sales area (Class A1 - 907 sq m net); associated access, car parking and landscaping; regular holding of classes/seminars/events and serving of refreshments (PART RETROSPECTIVE) – Application Refused – 23/02/2011

11/01162/FUL: Serving of a limited range of refreshments (mainly teas, coffees and cakes) for a temporary period (July to September 2011 only) between the hours of 9.30am and 4.30pm Mondays to Saturdays and 10.00am and 4.00pm Sundays and Public Holidays, for the consumption on the site only (i.e. not for takeaway), to be served and consumed outside of the building only; and siting of a maximum of 20 seats and associated tables on the rear terrace only – Application Refused – 26/08/2011

11/01702/FUL - The retention of the facilities building (410 sq m GEA) comprising an area for the display and sale of plants, gardening goods, Long Barn products and Long Barn by-products (190 sq m net), use of first floor for office and storage space, a space for staff meetings and country craft workshops (36 sq m net), serving of refreshments in the building (20 seats) and on the plant terrace (20 seats), associated kitchen, office space, plant room, storage, toilets and lift; external display/sales area (907 sq m net); associated access, car parking and landscaping (part retrospective) (RESUBMISSION) – Application Permitted 31/02/2012

13/02145/FUL - (AMENDED DESCRIPTION AND PLAN) Extensions and alterations to existing mixed use facilities building including the erection of a covered plant sales area (275 square metres) and covered link and extension to the existing barn comprising, storage, packing and despatch of customer orders, storage of machinery, stock, distillation plant equipment, seasonal displays, shelving / racking, enclosed loading / delivery bay for delivery of goods and customer toilets (398 square metres gross internal floor area). Variation of condition 5 attached to planning permission ref. 11/1720/FUL to enable trading between 08.30 and 17.30 seven days a week at Long Barn Winchester Ltd, The Long

Barn, The Old Sheep Fair, Bishops Sutton Road, Alresford, Hampshire, SO24 9EJ – Application Permitted 22/08/2014

15/01175/FUL - Reduce height of tiled roof, larger central glazed area – Application permitted 27/07/15.

17/02254/FUL - Retrospective application for the provision of an additional 28 car parking spaces including 2 disabled spaces – Application Permitted 25/10/17

18/01743/FUL - Siting of an authentic shepherds hut within the grounds of Long Barn, The Old Sheep Fair, and to use it to provide a space for beauty treatments- Application Permitted 03/10/18

Consultations

Head of Strategic Planning:

The application requires clarification in respect of the quantum of additional goods proposed to be retailed from the site and it is not clear how many restaurant seats would constitute ancillary. The level and type of items to be retailed from the site that are not Lavender Barn or associated products (as set out in condition 2) is critical as a retail outlet and restaurant in the countryside would be contrary to the NPPF Chapter 7 Ensuring the vitality of town centres and a sequential test would need to be undertaken. A retail outlet and restaurant in the countryside would also be contrary to the policies of the development plan (policy DS1, MTRA2, MTRA4, CP8 of LPP1 and DM1, DM7 of LPP2) and may be harmful to the shopping centre in Alresford. Strategic Planning Team 7th May 2019.

Since the above comments were received, further retail assessments have been undertaken which have been considered by the strategic planning team. The retail studies indicate that additional items being shown at Long Barn are unlikely to have a significant impact on local businesses.

Economic Team

The economic and tourism team at Winchester City Council are unable to support this variation of condition 2 of planning permission 13/02145/FUL because of the potential impact on Alresford town centre. The condition was originally put in place to avoid competition with the shops in Alresford's West and Broad Street whilst allowing the Long Barn business to expand.

The variation to condition 2 seeks to remove the seating limit for the café currently set at 20 and to enable the Long Barn shop to sell homewares, food and drink, gift and cards, stationery, clothing, jewellery, garden wildlife and dog care products. It is noted that there are currently a number of cafés and shops selling these items in Alresford town centre.

A surveyⁱ indicated that nearly three quarters (72%) of shops in the town centre area are unique to Alresford. These independent quaint shops coupled with a town centre renowned for its pastel-painted Georgian house and the Watercress Line visitor attraction add to the town's visitor appeal further boasting the economy. The most recent visitor survey showed that the total expenditure by visitors (overnight and day) to Alresford is estimated to have been over £7 million.

Nationally high streets are under pressure due to an increase in online sales and rising costs. There are currently at least three vacant shop units in Alresford town centre. Alresford Chamber of Commerce have indicated in their consultation response that a large number of their members have been clear about the detrimental financial impact on their business as a result of the failure of the applicants to comply with planning condition 2. It would be useful to commission further research in the form of an economic health check for Alresford which quantifies the current footfall and trading situation and recommends actions supporting the vibrancy of the High Street.

It should also be noted that Long Barn provides parking to support the town centre and employment opportunities for local people.

Alresford Chamber of Commerce

The high street is the heart of the Alresford community. Its popularity is due to the diversity and large number of independent retailers. The chamber does not want to see the high street fragmented or denuded. The Alresford Chamber of Commerce has been aware of the Long Barn's business proposition since 2010. The applicant initially presented their proposal to the Chamber committee prior to the barn being built and it received general support. The Chamber continues to support Long Barn as a valued local business as long as they adhere to the planning permission and conditions they were granted as per 11 01702FUL. Long Barn has developed and grown as an Alresford business which the Chamber is here to encourage. However this retrospective application along with further investigation has made the Chamber aware that the initial conditions and restrictions that the Chamber supported have not been adhered to. A large number of our members have been clear about the detrimental financial impact on their businesses of Long Barn's failure to comply with the terms of their granted planning permission. Therefore Alresford Chamber of Commerce objects to this application and cannot offer its support.

Representations:

New Alresford Parish Council:

NATC have been awaiting an economic report from WCC to recognise if Longbarn has positive or negative effect on the town. This report has not been forthcoming so in light of this it was resolved that conditions g) and i) on Longbarn have to remain in a modified form that is clear and enforceable. The committee would like to see the actual number of seats as proposed to a percentage of area taken for seating and to itemise the products in condition i) as proposed to 'associated items'. This will make the conditions less ambiguous. These specifics should be sorted out by WCC Planning on the proviso that any forthcoming data establishes that there is no impact on the town.

139 letters received objecting to the application for the following reasons:

- Impact on local businesses
- Impact on vitality of high street
- Impact on long term economic sustainability of the town centre
- Impact on footfall within the town centre
- Impact of expansion of café
- Impact of planning creep at the site

- Non-compliance with original planning conditions
- Use not appropriate for out of town location

Reasons aside not material to planning and therefore not addressed in this report

- Long Barn using suppliers of competing businesses
- Long Barn deliberately ignoring planning rules
- The use of the Long Barn as a supermarket within the future
- Behaviour of Long Barn owners

189 letters of support received.

- Support for local independent business
- Increased visits to the town
- Linked trips between the town centre and application site
- Outside interest in the area by bringing in non-residents
- Employs local people
- Supports local business
- Increased footfall within town centre
- Local and sustainable products
- Important to the local community
- Encourages return trips to Alresford

Relevant Planning Policy:

<u>Winchester Local Plan Part 1 – Joint Core Strategy</u> DS1 Development Strategy and Principles MTRA4 Development in the Countryside CP8 Economic Growth and Diversification CP10 Transport CP20 Heritage and Landscape Character.

Winchester District Local Plan Part 2 – Development Management and Site Allocations DM1 Location of New Development.

DM7 Town, District and Local Centres DM18 Access and Parking DM23 Rural Character

National Planning Policy Guidance/Statements: National Planning Policy Framework

Planning Considerations

Principle of development

The application site is not located within a defined settlement boundary, therefore countryside policies apply. The proposal seeks to regularise the selling of goods at the site which were not authorised by the previous planning consents 11/01702/FUL and 13/02145/FUL which allowed the use of the buildings on site for the sale of plants, gardening goods, Long Barn by-products, ancillary indoor and outdoor café seating, associated kitchen, office space, plant room, storage, toilets and lift, external display area, access, car parking and landscaping.

Noted above is the condition as proposed to be varied, which would be amended from the approved condition 02 on planning permission 13/02145/FUL as follows:

The storage area, mail order office and general sales area hereby approved shall only be used for the sale, storage and distribution of the following items;

a) Trees, lavender plants and plants of all kinds, dried and fresh cut lavender, wreathes and associated items;

b) Long Barn by-products (products made using Long Barn botanical ingredients, oils and extracts);

c) Composts, peats and other goods associated with plant/garden care;

d) Pots and containers of all kinds;

e) Traditional garden sundries including hand tools, tools, raffia, twine, gloves, aprons, baskets, rugs, cloches, plant supports, obelisks, ornaments, and associated items;

f) Seeds and bulbs, dried, artificial and cut flowers and goods associated with their care and maintenance;

g) Ancillary indoor and outdoor seating for the serving of refreshments which shall comprise no more than 17% of the total space available at ground floor level as defined as the coloured zones on Drawing LB001.

h) Space for workshops or events, limited to no more than 15 workshops in any calendar year

i) Homewares, food and drink, gifts and cards, stationery, clothing, jewellery, garden wildlife and dog care products which shall comprise no more than 8% of the total space available at ground floor level as defined as the coloured zones on Drawing LB0001.

National and local plan policies seek to protect the character of the countryside and also recognise the important role that economic development plays in the countryside. Policy DS1 of WDLPP seeks to apply a town centres first approach to retail. In this instance the existing use of the site is also a pertinent consideration as retail has already been allowed on the site. The main consideration is therefore whether the proposed expansion of goods on site accords with local plan policies or causes material planning harm.

Policy MTRA 4 of Winchester District Local Plan Part 1 allows for certain type of development outside the defined settlement boundaries which includes the expansion or redevelopment of existing buildings to facilitate the expansion on-site of established businesses or to meet an operational need, provided development is proportionate to the nature and scale of the site, its setting and countryside location.

The Long Barn business has expanded since its establishment in 2009 and the applicant has identified the need to diversify the sale of goods in the current retail climate with threats from online shopping and increasing business rates. Notwithstanding this, the applicant has provided detailed sales figures which show that the additional products only take up 8% of the total retail floor space originally approved under 13/02145/FUL. The sale of additional goods is therefore considered to be proportionate to the nature and scale of the site and compliments the main use of the barn as a garden centre.

Impact on New Alresford Town Centre

Significant concern has been expressed in regard to the impact of the proposal on local business within New Alresford Town Centre. Retail information has been sought from both Long Barn and local businesses to establish whether there is any significant harm

rising from the sale of additional goods from Long Barn in accordance with the advice from the Economic Development team in response to the concerns

The information submitted shows that there is a decrease in turnover for some local businesses within Alresford. It is first important to consider that turnover is not an indicator of profitability of a business, and secondly there is no evidence to prove that this decrease in turnover is caused by the sale of additional goods at Long Barn.

There are many factors which impact on a local business. The Centre for Retail Research confirms that factors resulting in a decline in retail include weak consumer demand caused by slow growth, the triumph of online retailing, intensive price competition and the fall in the share of consumer spending on retail merchandise in favour of travel, eating out and experiences. Business rates have also increased which impacts on traders but not for online retailers who have low operating costs that can sell a more diverse range of products at a much lower price.

The applicant has provided a retail study which demonstrates retail expenditure with New Alresford and the surrounding areas has increased since 2004. The study focuses on two postcode areas, SO24 0 and SO24 9.

The data provided by the applicant has been obtained by Oxford Economics and is supported by Turley Economics who were commissioned to prepare the Population and Expenditure Date note submitted as part of the application. The information provided is therefore considered to be independent and un-biased.

The data shows that in terms of absolute numbers, retail expenditure per person has increased in both SO24 0 and SO24 9 postcode sectors.

- **SO24 0:** Total per person retail expenditure was £5,661 per annum in 2004; in 2019 this figure is £7,152.25, equivalent to an increase of 26.3% over this timeframe.
- **SO24 9:** Total per person retail expenditure was £5,570 per annum in 2004; whereas in 2019 the figure is £6,972.20, equivalent to an increase of 25.2%.

This increase in retail expenditure since 2004 indicates that there is increased spending power amongst the population of these two postcode areas in which both the local business of New Alresford Town Centre and Long Barn are situated.

The retail study demonstrates that expenditure within the SO24 0 and SO24 9 postcode areas on Long Barn's main retail offer has increased since 2004 and shows a continued high demand for these products.

Expenditure within the SO24 0 and SO24 9 postcode areas have increased since 2004. Expenditure on clothing and jewellery has also increased significantly indicating that there is sufficient spending power within the local area to support existing shops within the District Centre selling these products in addition to the small number of products stocked by Long Barn.

Vacancy Rates

Vacancy rates are a key indicator of the success of a high street, a vacancy rate is the percentage of available retail units that are vacant or unoccupied at a particular time. High vacancy rates indicate that a high street is not operating well while low vacancy rates can point to strong retail sales.

A town centre health check was submitted originally with the planning application which stated that there were vacant units with New Alresford Town Centre, which is considered to be a relatively low vacancy rate. Since submission of the application in March this year, the vacancy rate has decreased to 1 unit, which is an excpetionally low figure. This demonstrates that there is still current retail investment within the town centre and suggest the high street is functioning well. Furthermore, if the town centre was not performing well or if footfall were low, it would be unusual to witness the introduction of new businesses.

Footfall

Significant concern has also been expressed in regards to the decline in footfall in recent years to the town centre. The applicant has commissioned a footfall survey of the town centre that was undertaken on 26th, 27th and 28th June 2019. This has been compared with a previous footfall survey that was conducted in 2016 under the same methodology.

The results from the most recent 2019 survey, conducted outside Wessex Pharmacy, exceed the figures recorded in in 2016 for both non-market days and market days, which indicates that the high street is still attracting a high level of footfall.

Local Economy

Paragraph 82 of the NPPF seeks to support a prosperous rural economy advising that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings. This is supported by Policy MTRA 4 and Policy CP8 which allow for diversification of rural businesses.

Customer surveys indicate that Long Barn attracts visitors from the local area but also district/nationwide visitors which is considered to be beneficial to the local economy. Surveys conducted on 311 participants between 19th -23rd of June 2019 revealed that 32% travelled from less than 5 miles, 26% travelled from 6-10 miles, 20% travelled from 1-20 miles, 22% travelled from that 20 miles.

Furthermore, given the proximity of the site to the town centre, it is considered that there is the potential for linked trips between the two sites. 299 participants responded to the question *'When visiting Long Barn, do you visit the District Centre?'*. The results of this survey indicate that 58.2% of those who responded to this question also travelled into the District Centre as part of their visit to Long Barn. This amounts to 174 individuals over the 5-day survey period and indicates that there are trips into the District Centre which would not have occurred otherwise.

To increase the number of linked trips further, Long Barn has recently installed a New Alresford District Centre map in the car park. The main aim of this is to advise customers from further afield of the services and facilities within the District Centre and to encourage more linked trips to the benefit of local businesses. This is considered to have the

potential to enhance the vibrancy of the high street.

Long Barn provides parking to support the district centre and employment opportunities for local people' by employing a total of 54 staff (10 full time and 44 part time / 23 full time equivalent) and uses many of the local businesses. It is considered that Long Barn generates economic benefit to New Alresford in terms of employment opportunities for local people, contribution to visitor spending, attraction of visitors to New Alresford and use of local retailers and services.

Café Seating

In addition to retail sales at Long Barn, there is also an existing ancillary café. In establishing the principle of the original planning application at Long Barn, a great focus was placed on the need to encourage visitors to stay longer and spend more money within the town. The café was considered to be part of the overall experience of visiting Long Barn and an ancillary facility in encouraging people to visit the site. The original permission granted consent for a mixed use facility with a café of 20 indoor and outdoor seats so the principle of having a café on the site has already been established.

Since the original permission the Long Barn business has expanded with the café also increasing in size; the applicant states that the existing restriction on seating is no longer sufficient to support the café element of the business. In general terms, cafés are often considered a part of the standard product in offer in many garden centres throughout the country and are considered to be integral components of the business. The café is considered to be an important part of the business moving and includes additional employment opportunities at the site.

Notwithstanding this, regard must be given as to whether the café with its increase in floor area would remain ancillary to the main use of the building. The submitted sales floor area plan shows that the indoor and outdoor café space will take up 17% of the total floor area of Long Barn, leaving 8% to the sale of the additional homewares and 75% for the sale of garden and long barn related products. The total floor retail floor area of the barn is 1341 sq metres; the café therefore occupies 227m2 of this total floor area which is under a quarter total floor area.

The entirety of the café floor space is unlikely to be used on a daily basis, as the seating area at Long Barn is designed to offer choice, inside or outside and does simply offer quantity. The use of both indoor and outdoor cafes spaces is therefore likely to be more seasonal in its use. It is considered that conditioning floor area in comparison to number of seats is more appropriate and enforceable in regards to this application as the many of the seats are in the form of benches which can fit a varying amount of people on.

The increase in café floor area and how this space is used, to offer choice not a maximum amount of seating, is considered to be proportionate to the main use of the building as a garden centre and is an important part of the Long Barn business. The expansion of the existing café is considered to accord to Policy MTRA 4 of WDLPP1 and Policy DM7 of WDLPP2 as it is not considered to detract from or result in a harmful impact on the town centre.

Conclusion

The sale of additional goods and increase in café seating is considered to be

proportionate and ancillary to main use of Long Barn. There is no evidence to indicate that the sale of these additional products has a harmful impact on local businesses with Alresford. Retail expenditure within New Alresford has risen since 2004 which indicates that there is sufficient spending power within the local area to support existing shops within the town centre selling these products in addition to the small number of products stocked by Long Barn.

The proposal is considered to accord with the Development Plan and the following policies: DS1, MTRA4, CP8, CP10 ,CP20 of Winchester District Local Plan Part 1 and DM1, DM7, DM18, DM23 of Winchester District Local Plan Part 2.

Recommendation

Approval subject to the following condition(s):

Conditions

1. The development shall be implemented in accordance with the approved plans and thereafter retained in accordance with the uses and distribution as specified on plan reference numbers;

D1309 01 rev B site layout D1309 05 Ground floor and roof plan D1309 06 Lower Ground and Attic Floor Plans D1309 07 Elevations LB0001 Sales Areas by Description

Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of the amenities of the area.

2. The storage area, mail order office and general sales area hereby approved shall only be used for the sale, storage and distribution of the following items;

a) Trees, lavender plants and plants of all kinds, dried and fresh cut lavender, wreathes and associated items;

b) Long Barn by-products (products made using Long Barn botanical ingredients, oils and extracts);

c) Composts, peats and other goods associated with plant/garden care;

d) Pots and containers of all kinds;

e) Traditional garden sundries including hand tools, tools, raffia, twine, gloves, aprons, baskets, rugs, cloches, plant supports, obelisks, ornaments, and associated items;

f) Seeds and bulbs, dried, artificial and cut flowers and goods associated with their care and maintenance;

g) Ancillary indoor and outdoor seating for the serving of refreshments which shall comprise no more than 17% of the total space available at ground floor level as defined as the coloured zones on Drawing LB001.

h) Space for workshops or events, limited to no more than 15 workshops in any calendar year

i) Homewares, food and drink, gifts and cards, stationery, clothing, jewellery, garden wildlife and dog care products which shall comprise no more than 8% of the total space available at ground floor level as defined as the coloured zones on Drawing LB0001.

Reason: The development hereby permitted is intended as an extension to the existing Long Barn business and it is appropriate to restrict the use of the extension in a similar manner, and in the interests of the amenities of the area.

3. No storage, access or encroachment shall occur within the boundary of the SSSI at any time.

Reason: To safeguard the Alresford Pond SSSI.

4. The building and associated uses hereby permitted shall not be open to the public outside the hours of 0830 - 1730.

Reason: To protect the amenities of the occupiers of nearby properties.

5. No machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site except between the hours of 0830 and 1730.

Reason: To protect the amenities of the occupiers of nearby properties.

6. No retail sales shall take place on the first floor of the existing building.

Reason: For the avoidance of doubt and in order to ensure that the Local Planning Authority can exercise control in the locality in the interest of local amenities and the character and appearance of the area.

Informatives:

1. This permission is granted for the following reasons:

The development is in accordance with the Policies and Proposals of the Development Plan set out below, and other material considerations do not have sufficient weight to justify a refusal of the application. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning permission should therefore be granted.

2. The Local Planning Authority has taken account of the following development plan policies and proposals:-

Winchester District Local Plan Part 1 (2013): DS1, MTRA 4, CP8, CP10, CP20 Winchester District Local Plan Part 2 (2017): DM1, DM7, DM18, DM23 Winchester District High Quality Places Supplementary Planning Document

3. In accordance with paragraph 38 of the NPPF (July 2018) Winchester City Council (WCC) take a positive and proactive approach to development proposals, working with applicants and agents to achieve the best solution. To this end WCC:

- offer a pre-application advice service and,

- update applicants/agents of any issues that may arise in the processing of their application, where possible suggesting alternative solutions.