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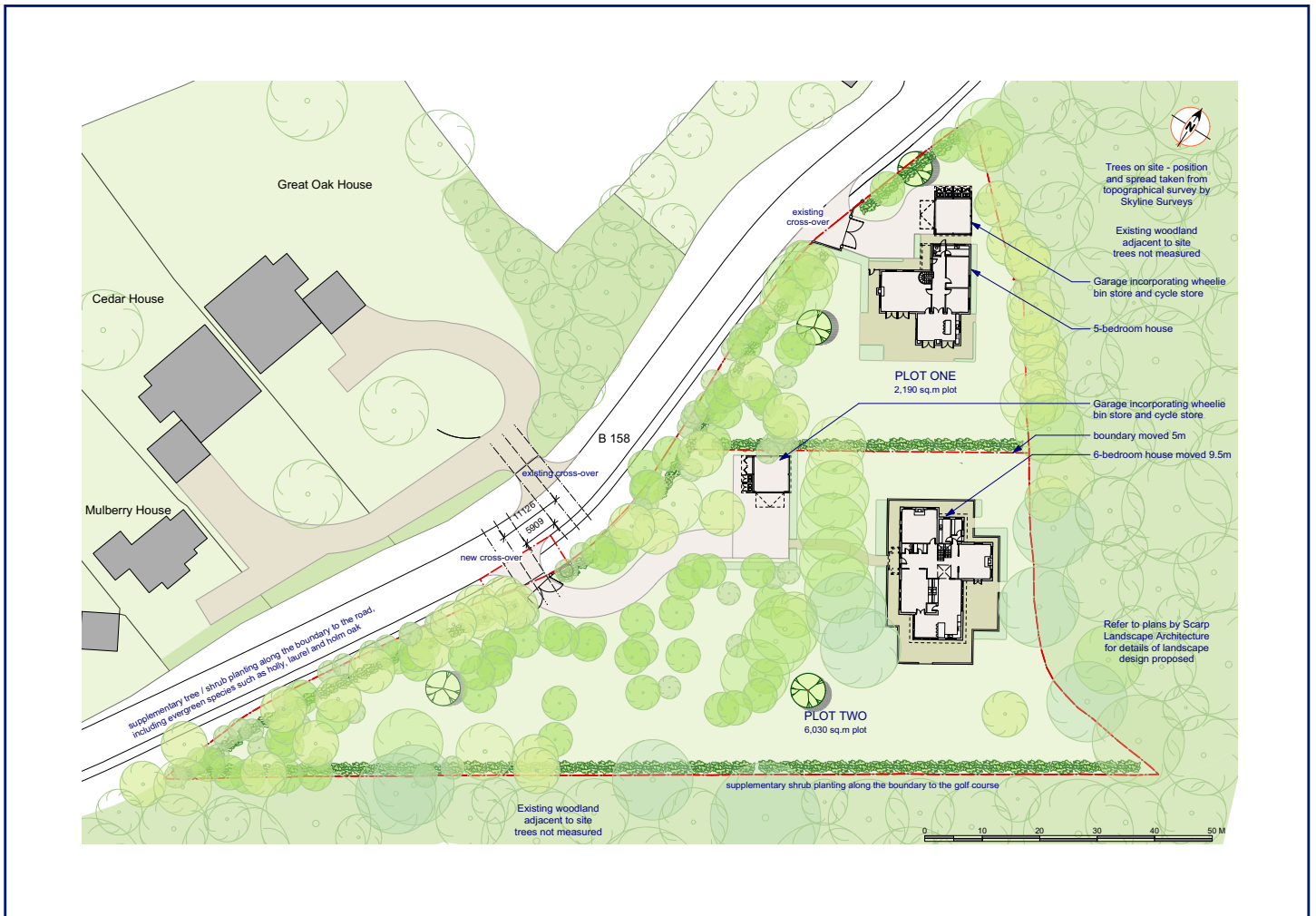
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UK PLANNING AGENCY

Supporting Statement



Site Name: The Spinney, High Road, Essendon. Hertfordshire, AL9 6HP

On behalf of: Essendon Property Ventures Ltd

Date: 16 June 2016

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A. SUMMARY AND CONCLUSIONS

1. This supporting statement accompanies the application to vary condition no. 1 of the planning permission (Welwyn Hatfield Borough Council (Ref. 6/2016/1118/FULL; “the permission”) for the erection of two dwellinghouses following demolition of existing buildings at The Spinney, High Road, Essendon, Hertfordshire, AL9 6HP.
2. The variation seeks to update the documents referred to in condition no.1 to reflect the following:

“variation of condition 1 of permission (Council ref 6/2016/1118/FULL) to allow alteration of the site boundary between plots 1 and 2, relocation of the permitted dwellinghouse within plot 2 and relocation of the proposed second site access onto the B158 High Road, and associated amendments to arboricultural works”.

3. All other elements of the scheme will remain as consented and the proposed wording to condition no.1 is therefore:

Variation of Condition 1		
	Existing Wording	Proposed Wording
Condition 1	<p>The development/works shall not be started and completed other than in accordance with the approved plans and details:</p> <p>A-00 Rev A & A-47 & A-48 & A-49 & PRI19764-03 & SE_L001 & SE_L002 & SE_L003 & SE_L004 & SE_L005 & SE_L006 & SE_L007 & SE_L008 received 7 June 2016 & A-20 Rev C & A-21 Rev C & A-22 Rev C received 27 September 2016 & A-30 Rev B & A-31 Rev B & A-32 Rev B & A-33 Rev B & A- 34 Rev B & A-35 Rev B & A-36 Rev B & A-37 Rev B & A-38 Rev B & A-40 Rev B & A-41 Rev B & A-42 Rev B & A-43 Rev B & A-44 Rev B & A-45 Rev B & A- 46 Rev B & A-50 received 4 August 2016 & Ecology Appraisal (The Ecology Consultancy) received 7 June 2016 & Tree Report (ACD Environmental) received 7 June 2016</p>	<p>The development/works shall not be started and completed other than in accordance with the approved plans and details:</p> <p>A-00 Rev A & A-47 & A-48 & A-49 received 6 June 2016 & PRI19764-03 (Rev A) & SE_L001 & SE_L002 & SE_L003 & SE_L004 & SE_L005 & SE_L006 & SE_L007 & SE_L008 & A-20 Rev; D A-21 Rev D; A-22 Rev D; & A-23 received 16 June 2017 & A-30 Rev B & A-31 Rev B & A-32 Rev B & A-33 Rev B & A- 34 Rev B & A-35 Rev B & A-36 Rev B & A-37 Rev B & A-38 Rev B & A-40 Rev B & A-41 Rev B & A-42 Rev B & A-43 Rev B & A-44 Rev B & A-45 Rev B & A- 46 Rev B & A-50 received 4 August 2016 & Ecology Appraisal (The Ecology Consultancy) received 7 June 2016 & Tree Report (ACD Environmental) received 7 June 2016 Arboricultural Impact Assessment and Method Statement (ACD Environmental) received 16 June 2017</p>

4. The first amendment relates to the alteration of the site boundary between plot 1 and plot 2. This boundary will be relocated 5 metres to the south, to create a more generous garden area for plot 1, therefore improving the layout of the development as a whole.
5. The second minor amendment relates to the relocation of the dwellinghouse proposed on plot 2. As the site boundary of plot 1 and plot 2 is proposed to be relocated, the location of the dwellinghouse will subsequently need to be altered to accommodate for the alteration in the site boundary. Therefore the dwellinghouse will be relocated directly south of its existing position by 9.5 metres to reduce any impact of overlooking or overbearing onto plot 1.
6. There would be no change in the bulk, mass, appearance or orientation of either of the properties. The proposed amendments will improve the overall layout of the proposal and increase the separation distances between the two properties and therefore improve the degree of privacy each dwellinghouse is afforded.
7. The third minor amendment relates to the removal of T12 (B category Common Oak Tree) located to the east of plot 2. It is proposed that this tree be removed to accommodate for the relocation of the dwellinghouse on plot 2.
8. Although T12 (Category B Common Oak Tree) is to be removed, along with T9 (B category Beech Tree) included within the consented scheme, out of thirty nine A and B trees present on the site, this represents a minimal loss, with the great majority of A and B category trees to be retained and protected throughout the development.
9. In mitigation for the removal of T9 and T12, replacement trees will be planted on a one for one basis in positions where they can achieve full size.
10. The majority of trees proposed for removal are in the lower two categories, C and U. These are small fruit trees and Hawthorn trees which are not of a quality that should represent any constraint to development. The trees removed will be mitigated for with replacement planting on a one for one basis of native trees.
11. The revised Arboricultural Impact Assessment document supports removal of the trees and, as part of the detailed landscape design for the scheme, includes suitable and sustainable replacements as and where appropriate.
12. The fourth minor amendment relates to the relocation of the second access proposed, serving the property on plot 2, further north than the consented position.
13. The proposed access location aims to maximise visibility, as it places the access on the outside of the bend in the road fronting the site. The amended access can be seen from 180 metres away by vehicles travelling southbound and from 195 metres away by vehicles travelling northbound representing a net improvement on the consented access, for which visibility was 200 metres to the north and 155 metres to the south.

14. The access will still be from the B158 High Road, but the access point will be approximately 16 metres further north of the location permitted by the consented permission. This will result in a reduction of hardstanding on the site compared to the existing planing permission.

B. INTRODUCTION

15. This supporting statement accompanies the application to vary condition no. 1 of the planning permission (Welwyn Hatfield District Council (Ref. 6/2016/1118/FULL; “the permission”) for the erection of two dwellinghouses following demolition of existing buildings at The Spinney, High Road, Essendon, Hertfordshire, AL9 6HP.
16. The variation seeks to update the documents referred to in condition no. 1 to reflect the following:

“variation of condition 1 of permission (Council ref 6/2016/1118/FULL) to allow alteration of the site boundary between plots 1 and 2, relocation of the permitted dwellinghouse within plot 2 and relocation of the proposed second site access onto the B158 High Road, and associated amendments to arboricultural works”.

The Site

17. The site lies on the edge of the village of Essendon, Hertfordshire located along High Road (B158). The site faces west adjacent to Essendon Brook, with Essendon Golf Course located to the east of the site.
18. There are a number of larger properties located to the south of the site along High Road . The site is served by direct rail links to London from Brookmans Park, Potters Bar and Broxbourne railway stations and is located within close proximity to the M25, via the A1000, thus providing good transport connections to destinations across the UK.
19. The site is currently occupied by a single detached house (Use Class C3) which can be accessed from High Road, Essendon. Mature trees and dense hedgerow along the sites boundaries screen the site from High Road and neighbouring properties.

Planning History

20. Permission has been secured for several extensions and outbuildings under permitted development rights (see Welwyn Hatfield Council ref (S6/2015/1203/HH) as well as a Certificate of Lawfulness (see Welwyn Hatfield Council ref S6/2015/0727/LUP).
21. A planning application (see Welwyn Hatfield Council ref. 6/2016/1118/FUL) for the site was granted in October 2011, for a scheme comprising the demolition of the existing buildings and construction of two new architect-designed dwellinghouses. This permission included two parking spaces per dwelling and an additional access onto the B158 High Road.
22. Following the above permission, a certificate of lawfulness was secured at the site for the erection of 2 detached single storey outbuildings - one to be used as a home study and the other to be used as a home gym (see Welwyn Hatfield Council ref. 6/2016/2545/LAWP).

The Application

23. As well as this supporting statement, the application is supported by:

- Application Form;
- Transport Statement;
- Arboricultural Impact Assessment and Method Statement;
- Tree Protection Plan;
- Landscape and Visual Appraisal;
- Landscape Masterplan;
- Landscape Detailed Masterplan Tiles (1-6 inclusive);
- Planting Schedules;
- Design Statement;
- Plans;
 - 1610 - A-20 (Rev D) Site Plan Proposed;
 - 1610 - A-21 (Rev D) Site Plan Proposed Showing Root Protection;
 - 1610 - A-22 (Rev D) Site Plan Proposed Showing Tree Analysis; and
 - 1610 - A-23 Site Plan Proposed Showing Comparison with Consented Layout.

C. THE PROPOSED VARIATION

24. This supporting statement accompanies the application to vary condition no. 1 of the planning permission (Welwyn Hatfield District Council (Ref. 6/2016/1118/FULL; “the permission”) for the erection of two dwellinghouses following demolition of existing buildings at The Spinney, High Road, Essendon, Hertfordshire, AL9 6HP.
25. The variation seeks to update the documents referred to in condition no.1 to reflect the following:
- “variation of condition 1 of permission (Council ref. 6/2016/1118/FULL) to allow alteration of the site boundary between plots 1 and 2, relocation of the permitted dwellinghouse within plot 2 and relocation of the proposed second site access onto the B158 High Road, and associated amendments to arboricultural works”.*
26. The original planning permission (Council ref. 6/2016/1118/FULL) was granted on 13 October 2016, with 6 conditions including condition 1 which states that:
- “The development/works shall not be started and completed other than in accordance with the approved plans and details:*
- A-00 Rev A & A-47 & A-48 & A-49 & PRI19764-03 & SE_L001 & SE_L002 & SE_L003 & SE_L004 & SE_L005 & SE_L006 & SE_L007 & SE_L008 received 7 June 2016 & A-20 Rev C & A-21 Rev C & A-22 Rev C received 27 September 2016 & A-30 Rev B & A-31 Rev B & A-32 Rev B & A-33 Rev B & A-34 Rev B & A-35 Rev B & A-36 Rev B & A-37 Rev B & A-38 Rev B & A-40 Rev B & A-41 Rev B & A-42 Rev B & A-43 Rev B & A-44 Rev B & A-45 Rev B & A-46 Rev B & A-50 received 4 August 2016 & Ecology Appraisal (The Ecology Consultancy) received 7 June 2016 & Tree Report (ACD Environmental) received 7 June 2016”*
27. This application therefore seeks to vary condition no.1, to amend the wording of the condition to reflect the revised plans and documents which set out the amendments to the site access and layout of the development and arboricultural works to be undertaken, specifically:
- Arboricultural Impact Assessment and Method Statement;
 - 1610A - 20 (Rev D) - Site Plan Proposed;
 - 1610A - 21 (Rev D) - Site Plan Proposed Showing Root Protection;
 - 1610A - 22 (Rev D) - Proposed Site Plan Showing Tree Analysis; and
 - 1610A - 23 Site Plan as Proposed Showing Comparison with Consented Layout.
28. The first amendment relates to the alteration of the site boundary between plot 1 and plot 2. This boundary will be relocated 5 metres to the south, to create a more generous garden area for plot 1, therefore improving the layout of the development as a whole.

29. The second minor amendment relates to the relocation of the dwellinghouse proposed on plot 2. As the site boundary of plot 1 and plot 2 is proposed to be relocated, the location of the dwellinghouse will subsequently need to be altered. Therefore the dwellinghouse will be relocated directly south of its existing position by 9.5 metres to reduce any impact of overlooking onto plot 1.
30. The third minor amendment relates to the removal of T12 (B category Common Oak Tree) located to the east of plot 2. It is proposed that this tree be removed to accommodate for the relocation of the dwellinghouse on plot 2.
31. The fourth minor amendment relates to the relocation of the second access proposed, serving the property on plot 2, further north than the consented position.
32. All other elements of the scheme will remain as consented and the proposed wording to condition no.1 is therefore:

Variation of Condition 1		
	Existing Wording	Proposed Wording
Condition 1	<p>The development/works shall not be started and completed other than in accordance with the approved plans and details:</p> <p>A-00 Rev A & A-47 & A-48 & A-49 & PRI19764-03 & SE_L001 & SE_L002 & SE_L003 & SE_L004 & SE_L005 & SE_L006 & SE_L007 & SE_L008 received 7 June 2016 & A-20 Rev C & A-21 Rev C & A-22 Rev C received 27 September 2016 & A-30 Rev B & A-31 Rev B & A-32 Rev B & A-33 Rev B & A-34 Rev B & A-35 Rev B & A-36 Rev B & A-37 Rev B & A-38 Rev B & A-40 Rev B & A-41 Rev B & A-42 Rev B & A-43 Rev B & A-44 Rev B & A-45 Rev B & A-46 Rev B & A-50 received 4 August 2016 & Ecology Appraisal (The Ecology Consultancy) received 7 June 2016 & Tree Report (ACD Environmental) received 7 June 2016</p>	<p>The development/works shall not be started and completed other than in accordance with the approved plans and details:</p> <p>A-00 Rev A & A-47 & A-48 & A-49 received 6 June 2016 & PRI19764-03 (Rev A) & SE_L001 & SE_L002 & SE_L003 & SE_L004 & SE_L005 & SE_L006 & SE_L007 & SE_L008 & A-20 Rev; D A-21 Rev D; A-22 Rev D; & A-23 received 16 June 2017 & A-30 Rev B & A-31 Rev B & A-32 Rev B & A-33 Rev B & A-34 Rev B & A-35 Rev B & A-36 Rev B & A-37 Rev B & A-38 Rev B & A-40 Rev B & A-41 Rev B & A-42 Rev B & A-43 Rev B & A-44 Rev B & A-45 Rev B & A-46 Rev B & A-50 received 4 August 2016 & Ecology Appraisal (The Ecology Consultancy) received 7 June 2016 & Tree Report (ACD Environmental) received 7 June 2016 Arboricultural Impact Assessment and Method Statement (ACD Environmental) received 16 June 2017</p>

D. POLICY DEVELOPMENT AND PLANNING CONSIDERATIONS

33. The application seeks to vary the wording of condition no.1 of the permission, to update the documents referred to by the condition to reflect the following:

“variation of condition 1 of permission (Council ref 6/2016/1118/FULL) to allow alteration of the site boundary between plots 1 and 2, relocation of the permitted dwellinghouse within plot 2 and relocation of the proposed second site access onto the B158 High Road, and associated amendments to arboricultural works”.

Existing Planning Permission

34. The existing planning permission (Ref. 6/2016/1118/FULL), granted on 16 October 2016 at a development management committee comprises:

“the demolition of the existing buildings and construction of two new architect-designed dwellinghouses”

35. This planning permission therefore represents the fallback permission that exists at the site.

Alteration of Site Boundary and Relocation of Second Dwellinghouse (Plot 2)

36. The existing permission at the property comprises the demolition of the existing buildings and construction of two-architect designed dwellinghouses.

37. The supporting application was heard at the development management committee on 13 October 2016 where Councillors moved to approve the application on the basis that:

“The proposed development, by virtue of its scale, nature and location would not cause harm to the openness of the Green Belt, would not result in encroachment of built form, would not fail to assist in urban regeneration or conflict with the five purposes of including land in Green Belt. In comparison with the fall back position, the overall reduction in footprint compared to the addition of bulk at first floor level is not considered harmful to the openness of the Green Belt.”

38. This application seeks to amend this permission to relocate the site boundary and dwellinghouse located on plot 2 to improve the overall layout of the development.
39. The proposal includes an amendment to relocate the site boundary of plot 1 and plot 2 by 5m to the south. This will enlarge plot 1 and improve the overall layout of the development - providing plot 1 with an increase in garden land.
40. The proposal also includes relocation the dwellinghouse within plot 2 by 9.5m to the south. This amendment relates to the relocation of the site boundary which would bring the site

boundary between plots 1 and 2 closer to the location of the existing dwellinghouse on plot 2.

41. Therefore the proposed relocation of the dwellinghouse will improve the overall layout of the proposal and increase separation distances between the two properties and thereby improve the degree of privacy each dwellinghouse is afforded.
42. There would be no change in the bulk, mass, appearance or orientation of either of the properties with the only amendment to built form at the site being the slight change in siting of the dwellinghouse (plot 2) to the south by 9.5m.
43. Therefore, the amendments proposed would not have a greater impact on the openness of the green belt than the consented permission.

Trees

44. The Arboricultural Impact Assessment and Method Statement submitted with this application evaluates the direct and indirect effects of the proposed design on the trees on site, and where necessary recommends mitigation.
45. ACD Environmental were instructed in March 2016 to prepare an Arboricultural Impact Assessment and Method Statement, submitted with the consented permission (Ref. 6/2016/1118/FULL).
46. Welwyn Hatfield Saved Local Policy R17 refers to trees, woodland and hedgerows. The policy states that:

“The Council will seek the protection and retention of existing trees, hedgerows and woodland by the use of planning conditions, section 106 agreements, hedgerow retention notices and tree preservation orders where applicable. New development will be required to incorporate wherever appropriate new planting with locally native species and should be in accordance with Policy D8 Landscaping.”
47. Welwyn Hatfield Saved Local Policy RA10 refers to landscape regions and character areas. The policy states that:

“Proposals for development in the rural areas will be expected to contribute, as appropriate, to the conservation, maintenance and enhancement of the local landscape character of the area in which they are located, as defined in the Welwyn Hatfield Landscape Character Assessment.”
48. Welwyn Hatfield Saved Local Policy D8 refers to landscaping. The policy states that:

“All development, other than changes of use of buildings, should include landscaping as an integral part of the overall design. This should reflect the strong tradition of urban landscape design in the district.

Landscaping schemes will require the use of materials which respect the character of the area, the planting of trees, hedgerows and shrubs and details of future maintenance. The retention and enhancement of existing key landscape features such as trees and shrubs, ponds and watercourses will be expected where feasible; where this is not possible, replacement planting should be carried out.”

49. This report has been updated to reflect the minor material amendments relating to the removal of T12 (Category B Common Oak Tree) and the proposed relocation of the sites second access.
50. Although T12 (Category B Common Oak Tree) is to be removed, along with T9 (B category Beech Tree) included within the consented scheme, out of thirty nine A and B trees present on the site, this represents a minimal loss. In mitigation for the removal of T9 and T12, replacement trees will be planted on a one for one basis in positions where they can achieve full size, with the replacement for T12 positioned to become part of T15 – T18.
51. The position of the proposed driveway has been adjusted in comparison to the approved scheme. This will require the removal of lower quality trees from G2 and G3, but allow the retention on some of the trees previously shown for removal on the approved scheme. Twenty nine category C trees are proposed for removal - compared with 27 in the consented permission. This is therefore considered not dissimilar in arboricultural terms.
52. The majority of trees proposed for removal are in the lower two categories, C and U. These are small fruit trees, and Hawthorn trees which are not of a quality that should represent any constraint to development. The trees removed will be mitigated for with replacement planting on a one for one basis of native trees.
53. The revised Landscape and Visual Appraisal confirms that to mitigate against the removal of trees T12 and T9, two replacement trees are proposed on the southern plot - one specimen of oak and one specimen of beech.
54. There would be no increase in the amount of vegetation that would be removed as a result of re-locating the southernmost vehicular access.
55. Peripheral site vegetation would be supplemented with new tree and shrub planting. A full species list for this tall shrub planting is provided in the Planting Schedule that forms part of this application. The vegetation would include evergreen species such as holly and laurel, specimens of which of already present on site.
56. All retained and proposed vegetation would be managed to maximise biodiversity value and to help ensure its healthy growth and contribution to the character of the site and surrounding landscape.
57. The revised Landscape and Visual Appraisal confirms that there would be no change to landscape character at national, district or local level as a result of the proposed minor amendments.

58. There would be an increase in the amount of on-site/shrub vegetation with a resultant net enhancement in the well-vegetated character of both the site and High Road.
59. Potential views of the proposed development are restricted to adjacent sections of High Road and to adjacent parts of Essendon Golf Course. With the exception of glimpsed views the site entrance, views of the proposed housing from High Road would be substantially enclosed by a belt of mature trees and understory shrubs along the western boundary, even in winter views.
60. The revised Arboricultural Impact Assessment and Method Statement and revised Landscape and Visual Appraisal support removal of the trees and, as part of the detailed landscape design for the scheme, include suitable and sustainable replacements as and where appropriate.
61. The proposal complies with the above saved policies RA10, R17 and D8 and will not cause a detrimental effect to the local landscape character of the areas and proposes replacement planting on a one for one basis of removed native trees and replacement trees on a one for one basis for T12 and T9.

Access and Transport

62. Paragraphs 29-32 of the Framework relate to the promotion of sustainable transport. Paragraph 29 states:

“[...] However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”
63. The Transport Statement submitted with this application provides details of the two site accesses permitted to connect the site with the B158 High Road, and the proposed amendment to the second access as part of the application.
64. Welwyn Hatfield Saved Local Policy M2 refers to Transport Assessments. The policy states that:

“Developers of major new traffic generating developments will be required to submit a transport assessment with the planning application. This must demonstrate the measures to be taken to minimise vehicular movements through improvements to passenger transport, pedestrian, and cycling facilities and state whether new highways works or traffic management measures will be required.”
65. Welwyn Hatfield Saved Local Policy M5 refers to Pedestrian Facilities. The policy states that:

“Wherever possible and practical the Council will seek improvements in facilities for the safe and convenient movement of pedestrians. The Council will require proposals for new development to give priority to pedestrian access in their layouts through the inclusion of safe and direct routes linking to existing or proposed footpath networks and facilities. Developers

may be required to provide or contribute towards off-site pedestrian facilities where this would be necessary to integrate it with surrounding areas. Development which would prejudice convenient and safe pedestrian movement will be refused."

66. The transport assessment concludes that proposed amendments comply with the above policies.
67. The existing access to the site, to the north east, will remain in the same location and will serve plot 1. This is as per the existing arrangement and is therefore not considered to have an impact on the current operation of the highway network.
68. An additional access serving plot 2 of the site was granted as part of the consented planning permission (Ref. 6/2016/1118/FULL). This access was to be located 95 metres south of the existing access, directly from B158 High Road.
69. This access was designed and consented with visibility splays of 2.4 metres x 156 metres, which exceeded the requirement for a 40 mph speed limit and was only 4 metres short of the 50 mph speed limit requirement.
70. The applicant is proposing a new location for the site's second access, serving plot 2, and will be approximately 80 metres south of the existing access serving plot 1. The access will still be from the B158 High Road, but the access point will be approximately 16 metres further north of the location approved by the consented permission. This will result in a reduction of hardstanding on the site, therefore the proposed development will have less of an impact on the openness of the greenbelt compared to the existing planning permission.
71. Visibility is the principal consideration with regards to highway safety. The proposed access location aims to maximise visibility, as it places the access on the outside of the bend in the road fronting the site. The amended access can be seen from 180 metres away by vehicles travelling southbound and from 195 metres away by vehicles travelling northbound representing a net improvement on the consented access, for which visibility was 200 metres to the north and 155 metres to the south. The improvement to the southbound visibility is particularly beneficial to highway safety given that the speed limit is unrestricted for a greater distance than to the north of the site, which changes to 30 mph approximately 20 metres from the existing site access.
72. The amended proposals comply with the requirement for a 50 mph speed limit (2.4 metres x 160 metres), providing some vegetation within the site is cut back, and one of the four chevron signs to the south is to be moved by 0.5m metres outside the visibility splay. Positioning this sign back against the fence and rotating it by 7° ensures the visibility splay is kept clear, while the sign remains visible for southbound vehicles.
73. The proposed access location is offset with respect to the Great Oak House and Mulberry House access on the opposite side of the B158. The proposed arrangement entails a left / right stagger, with a distance of 11 metres between the centrelines of the minor road accesses. This arrangement is in line with the Design Manual for Roads and Bridges (DMRB)

recommendations, as it minimises potential conflicting movements, particularly for vehicles turning right from the main road into the site. A reduction in stagger distance or a left / right stagger could create conflicting movements with potential for queuing or collisions.

74. The 10 metre stagger is also deemed sufficient to discourage drivers from performing U-turn manoeuvres using the vehicle crossovers, which would present risks to highway performance and safety.
75. Servicing, waste collection and other delivery arrangements will remain as per the existing situation, directly from the B158 High Road.
76. The trip generation of the site is not affected by the amendments to the planning consent.
77. The proposed amendments are therefore considered to have negligible impact upon the local highway network.
78. Please see the Transport Statement submitted with this application for further details.

Amenity

79. Welwyn Hatfield Saved Local Policy D1 refers to Quality of Design. The policy states that:
“The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.”
80. Welwyn Hatfield Supplementary Design Guidance refers to privacy and overlooking for all new residential development. It states:
“The Council expect all new development, whether extensions or new units to be designed, orientated and positioned in such a way to minimise overlooking between dwellings, which would affect their internal living areas and private rear gardens or amenity areas.”
81. The proposed relocation of the dwellinghouse will improve the overall layout of the proposal and increase the separation distances between the two properties.
82. The proposed amendments are therefore considered to comply with the above policies.