

Thistle Architecture

PLANNING RESEARCH AND RISK ANALYSIS

Broxbourne Borough Council

155 Windmill Lane, Cheshunt, Hertfordshire, EN8 9AR

Project reference: TH00214

Proposal: Conversion of a detached three bedroom dwelling (Use Class C3) into a six bedroom, all en suite house in multiple occupation for six occupants (Use Class C4), delivered through a ground led scheme comprising a rear extension, a possible side extension and the incorporation of the detached garage. The loft, at approximately 1.8 metres to the ridge, is below the required standard and is not part of the scheme.

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Prepared by: Thistle Architecture/KT

This document is internal planning research prepared to inform the design strategy and any subsequent planning submission. It is not a Design and Access Statement. Every material claim is cited in Section 13.

1. Executive Summary (Risk Dashboard)

The change of use is not the risk on this site. Broxbourne has no Article 4 direction and a six person house in multiple occupation is a permitted development change of use requiring no planning permission. Following the feasibility meeting of 30 July 2026 the layout is resolved: six en suite bedrooms are achieved without the loft, the garage is integrated as a bedroom through the rear extension connection, and the agreed route is a householder application followed by a lawful development certificate for the C4 use. The remaining risk is concentrated in one place: the Environment Agency flood map places the site almost fully within Flood Zone 3, so the flood risk assessor's recommendations on floor levels and resilient construction are the principal outstanding unknown for cost and for the garage bedroom design.

Issue	Risk	Summary
Article 4 direction (change of use)	LOW	No Article 4 direction in Broxbourne. The C3 to C4 change of use for six persons is permitted development. Verified against the national planning dataset on 27 07 2026 (zero entities at the site).
Loft conversion route	LOW	Resolved. The feasibility layout of 30 July 2026 achieves six bedrooms without the loft: three on the ground floor including the converted garage and three on the first floor, all above 9 sqm. The loft, at approximately 1.8 metres to the ridge, is repurposed as plant and storage space, agreed with the client.
Garage bedroom strategy	MEDIUM	Route agreed and drawn. The garage is integrated through the

		rear extension connection and shown as an 11.7 sqm en suite bedroom of the house within a householder application, with its own external escape door. Direct approval precedent applies (07/25/0208/HF; appeal 6001363). The residual risk is the flood assessor's floor level recommendation against the unverified garage ceiling height.
Flood risk	HIGH	The Environment Agency flood map for planning places the site almost fully within Flood Zone 3, with only the front of the site in Zone 2, a worse position than the constraint layers first suggested. A flood risk assessor is appointed before the application; the recommendations, most likely raised floor levels and resilient construction, drive cost, programme and the garage bedroom design. Flood risk has not caused a refusal on any application submitted by this practice; the exposure is cost and design, not the principle of consent.
Bedroom sizes under Policy H5	LOW	The feasibility layout holds every bedroom above the standard: 11.7, 9.5 and 11.7 sqm on the ground floor and 12.5, 9.5 and 10.6 sqm on the first floor, with en suites of approximately 2 sqm additional to the room areas. The kitchen and dining space is 26 sqm against the 23.5 sqm combined requirement. Dimensions are from the agent's plans and are confirmed at measured survey.
Highways and parking	LOW	Confirmed at the feasibility meeting: the frontage parking space is retained and no side extension toward the frontage is proposed. The garage does not meet the council's 3 by 6 metre usable garage standard, so its conversion loses no countable parking space.
Conservation area and heritage	LOW	Not in a conservation area, not listed, no heritage designation. Verified by national dataset point queries returning zero entities.
HMO density and sandwich rule	LOW	No density or spacing policy in Broxbourne. Appeal 6001363 held that three HMOs within 500 metres is not an over concentration and noted the term is undefined in Policy H5. No HMO applications

		appear in the 500 metre planning record around this site.
Family housing protection	LOW	No policy protects family dwellings from HMO conversion. No residential floorspace is lost.
Amenity and waste	LOW	Garden retained and every bedroom en suite, exceeding the shared standard. A screened bin store is a straightforward design item.
Appeal precedent	LOW	Appeal 6001363 (92 Great Cambridge Road, allowed 08 01 2026) retrieved from the council application file and analysed in Section 9. Every main issue was resolved in the appellant's favour. No dismissed HMO appeal was found in the borough record.
Housing land supply context	LOW	Favourable. Broxbourne can demonstrate only 2.81 years of housing land supply (June 2025), so the tilted balance applies and additional weight attaches to housing delivery.

2. Site Context Recap

The site is 155 Windmill Lane, Cheshunt, a detached three bedroom house of approximately 89.5 sqm on a plot of approximately 238 sqm (Land Registry title HD167724, freehold), with a detached garage of approximately 5.0 by 2.5 metres internally and side access. The plot is irregular: the neighbouring property to the left encroaches into the left hand space, while the rear garden of the site extends behind the garage of the neighbour to the right. The site lies approximately 250 metres west of Cheshunt railway station and is within the built up area of Cheshunt. The title records no planning history for the property and no application has been made on the site in the period covered by the planning record.

The proposal is a pre purchase feasibility for conversion to a premium six bedroom, all en suite house in multiple occupation for six occupants. The loft measures approximately 1.8 metres to the ridge and is not convertible under the 2.13 metre standard, so the scheme is ground led: a rear extension and incorporation of the garage through the extension connection. The dining room dimensions on the agent's floorplan are unverified and may include the bay; a measured survey is required before design freeze. The asking price is circa 400,000 pounds and the client intends to move quickly.

3. Local Plan Policy Framework

The adopted development plan is the Broxbourne Local Plan 2018-2033, adopted on 23 June 2020. A new Local Plan is being prepared, with the Council resolving to progress an update in September 2025 and a Local Development Scheme published in October 2025; this is at an early stage and carries limited weight. The Residential Design and Amenity Supplementary Planning Guidance was adopted in August 2025 and guides extensions and neighbouring amenity. The Authority Monitoring Report 2024-25 records a five year housing land supply of 2.81 years, so the Council cannot demonstrate a five year supply and the presumption in favour of sustainable development applies to housing proposals.

- **H5** Houses in Multiple Occupation. The determinative policy; set out in full in Section 4.

- **DSC1** General design principles. A high standard of design respecting local character, roof form, materials and building lines.
- **DSC2** Extensions and alterations. Scale, design and external appearance must not unduly impact the parent building and wider setting. The key policy for the rear and side extensions.
- **EQ1** Residential and environmental quality. No detrimental impact on neighbouring daylight, sunlight, outlook or privacy; refuse storage compliant with the Waste SPG.
- **W5** Flood risk. Development in areas at risk of flooding must pass the sequential test and, where necessary, the exception test; proposals must not increase flood risk elsewhere. Clause IV requires on site flood storage and flood resilient features for intensification or redevelopment within Flood Zone 3.
- **TM2 / TM5** Transport and parking. Applications judged against the parking guidelines (0.5 spaces per HMO tenancy under the Interim Residential Parking Standards 2011), informed by public transport accessibility.
- **NEB1** Biodiversity strategy. The mitigation hierarchy applies; extensions of this scale ordinarily fall within the de minimis exemption from biodiversity net gain.

Officer reports also rely on the Borough Wide Supplementary Planning Guidance (2004, updated 2013), the Waste Supplementary Planning Guidance (August 2019), the Nationally Described Space Standards (2015), the Interim Policy for Houses in Multiple Occupation (April 2012) and the Broxbourne HMO Amenity Guidance (October 2020). The 2012 Interim HMO Policy is cited in decisions but is not published online; a copy should be requested from the Council. The site is not allocated and no SHLAA site affects it.

4. HMO Specific Policy Analysis

Policy H5 (full adopted text, Local Plan pages 125 to 126):

I. Proposals for Houses in Multiple Occupation for 5 or more people will only be supported where the proposal is located close to town centres and is well served by public transport.

II. All proposals must comply with the relevant development plan policies and design standards set out in the Plan, including the standards set below.

III. The proposal must also satisfy the guidelines set out in the Council's Broxbourne HMO Amenity Guidance, which includes bedroom sizes as set out below: one person/one room unit with separate kitchen 9 sqm; one person/one room unit with integrated kitchen 12 sqm; two person/one room unit with separate kitchen 13 sqm; two person/one room unit with integrated kitchen 16 sqm.

IV. The proposal must satisfactorily demonstrate that: (a) the use will not result in an adverse impact, including cumulative impact, on the character and appearance of the local area; (b) the use will not adversely affect the character and appearance of the building; and (c) the use will not adversely affect the amenity of adjoining or adjacent residential occupiers.

- **Engagement.** At six persons the change of use is permitted development, so H5 is not formally engaged by the use itself. It is engaged if the use is ever included in a full application or the scheme grows to seven or more persons (*sui generis*).
- **Locational test.** Officers apply clause I generously. At 109 Northfield Road the test was met with the station 450 metres away and the town centre 0.7 miles away. This site is approximately 250 metres from Cheshunt station, a materially stronger position.
- **No HMO SPD.** Broxbourne has not adopted an HMO planning SPD. The operative standards document is the HMO Amenity Guidance (October 2020), summarised in the Space Standards and Client Questions documents.
- **Density.** No percentage concentration threshold and no spacing rule exists. Paragraph 21.12 states the Council will strongly resist a concentration of HMOs in one location; appeal 6001363 confirmed the term over concentration is undefined, sits only in supporting text, and that three HMOs within 500 metres does not amount to one.
- **Family housing.** No policy protects family sized housing from HMO conversion.

- **Definitions.** A small HMO in Use Class C4 houses three to six persons. Seven or more persons is sui generis and requires planning permission (paragraph 21.10).

5. Article 4 Direction Analysis

- **Within a direction:** No. Verified three ways on 27 07 2026: the national planning dataset point query at the site returns zero Article 4 entities; the LandStack constraint layer returns none; and the Council's HMO Amenity Guidance (October 2020, page 4) states no direction has been introduced and planning permission is not required for HMOs of six or fewer persons.
- **Right removed:** None. Class L of the General Permitted Development Order permits change of use between C3 and C4 in both directions.
- **Implication:** The change of use to a six person C4 HMO requires no planning permission. Multiple recent certificates confirm the position locally (Section 8).
- **Currency:** The controlling council statement is dated 2020. Short written confirmation from the Broxbourne duty planning officer is advised before purchase, as neighbouring authorities have introduced HMO directions.

6. Conservation Area, Heritage and Design

The site is not within a conservation area, is not statutorily or locally listed, and no listed building stands close enough to constrain a rear or side extension. National dataset point queries at the site on 27 07 2026 return zero entities for conservation areas, listed buildings and tree preservation zones. The design context is therefore DSC1, DSC2 and the Residential Design and Amenity SPG 2025: extensions should be subordinate to the host dwelling, respect the building line and neighbouring outlook, and use matching materials. The irregular plot boundary with the neighbour to the left is the main design sensitivity for a side extension.

7. HMO Density Assessment for this Site

Broxbourne has no numeric density threshold, so there is no cap to breach. Officers assess concentration case by case against the Council's HMO Register; at 109 Northfield Road the officer noted the nearest registered HMO and found no proliferation issue, and at appeal 6001363 the Inspector held that three HMOs within 500 metres is not an over concentration. An HMO Checker report was generated for this site (report 3024) but the report page is not machine readable in this environment and its figures could not be extracted; the link is retained in the project file. No HMO application appears in the planning record within 500 metres of the site, and the site itself has no planning history.

Density result: PASS (low risk). No density or sandwich policy exists in Broxbourne, the surrounding record shows no HMO concentration, and the appeal benchmark is generous. Confirm the position at the feasibility meeting and, if desired, request the current HMO Register entry for the ward from the Council.

8. Recent Application Trends Nearby

Reference	Address	Proposal	Outcome	Key reason
07/25/0190/F	109 Northfield Road, Waltham Cross (approx 1.0 km	C3 to seven person HMO, no external works	Refused 24/04/2025	Two double bedrooms below the 13 sqm Policy

	south)			H5 minimum; sole reason for refusal
07/25/0423/F	109 Northfield Road, Waltham Cross	Resubmission as seven person sui generis HMO	Granted 30/06/2025	Internal walls moved; bedrooms 13.1 and 13.2 sqm; parking shortfall of 2.5 spaces accepted in sustainable location; outbuilding conditioned to ancillary use
07/25/0243/LDP	42 Bury Green Road, Cheshunt (approx 1.7 km west)	LDC: proposed C3 to C4 six person HMO	Granted 13/05/2025	Change of use is permitted development (Class L)
07/25/0960/LDC	92 Great Cambridge Road, Cheshunt (approx 1.2 km west)	LDC: existing six person C4 HMO	Granted January 2026	Permitted development change of use confirmed lawful
07/25/0410/F	92 Great Cambridge Road, Cheshunt	Change of use to ten person sui generis HMO with garage converted to two bedrooms	Refused 23/10/2025; appeal 6001363 allowed 08/01/2026	Inspector: three HMOs within 500 metres is not an over concentration; no amenity or character harm; garage bedrooms approved with matching materials; occupancy capped at ten
07/25/0893/LDP	Rosedale area, Cheshunt (approx 1.4 km southwest)	LDC: C3 to C4 six person HMO plus single storey rear extension, rear dormer and rooflights	Granted 09/01/2026	Combined permitted development package certified lawful
07/24/0602/LDP	Wormley/Broxbourne (approx 3.7 km north)	LDC: six person HMO plus ground floor side extension, rear extension and loft conversion	Granted 09/09/2024	Combined permitted development package certified lawful
07/26/0202/LDP	Bury Green area, Cheshunt (approx 1.7 km west)	LDC: garage conversion to habitable room with window replacing garage door, plus six person HMO	Withdrawn March 2026	Garage conversion element removed; the site resubmitted in June 2026 as a plain C3 to C4 certificate (07/26/0498/LDP, pending)
07/25/0236/F	Rosedale area, Cheshunt (approx 1.4 km southwest)	C3 to sui generis HMO with rear dormer and rooflights	Granted 30/06/2025	Full application route accepted; design and amenity compliant
07/24/0221/F	Cheshunt (approx 1.1 km northwest)	Change of use from residential to C4 HMO and associated works	Granted 03/06/2024	Compliant standards in a sustainable location

Recurring approval factors: compliant room sizes against the Policy H5 table, a sustainable location near public transport, retained garden amenity and unaltered or modest external form. Recurring refusal factor: bedroom sizes below the H5 minimums, the sole refusal ground at 109 Northfield Road. The garage signal is now clear in both directions: garage bedrooms fail under the permitted development certificate route (the one certificate application including a garage conversion was withdrawn) but succeed through a planning application where the garage forms part of the main building (bedrooms 3 and 4 in the converted garage were approved at appeal at 92 Great Cambridge Road). Freestanding sleeping accommodation remains conditioned to ancillary use; integrated accommodation is approvable.

9. Appeal Pattern Analysis

No appeal decisions were supplied by the user for this project. One relevant appeal decision was retrieved in full from the Council's application file via LandStack on 27 07 2026 and a text copy is saved in the 4_RESEARCH/Appeals folder. The LandStack appeal metadata field for the application still records no appeal, so the decision was located through the application document list rather than the appeal index; an appeal date search of the borough record returned no other HMO appeal decisions since 2021. No dismissed HMO appeal was found.

Allowed appeals

Appeal reference	Site	Year	Reasoning summary
6001363 (application 07/25/0410/F)	92 Great Cambridge Road, Cheshunt EN8 9ES	Allowed 8 January 2026 (Inspector N Bowden)	Ten person sui generis HMO in a former four bedroom detached house. Over concentration: the term is undefined and appears only in the supporting text to Policy H5; three HMOs within 500 metres is not an over concentration among many hundreds of homes. Amenity and character: external works limited to replacing garage doors with a wall and windows; ten occupants held to create no greater disturbance than a family home. Parking: five spaces met the local standard and the site is well connected to public transport. Conditions: matching materials to the garage conversion (bedrooms 3 and 4), retained refuse and cycle storage in the remaining garage area, Approved Document E sound insulation, and a ten occupant cap.

Dismissed appeals

None found in the borough record for HMO development since 2021.

The dominant pattern from the single available decision favours the applicant on every contested issue. The Inspector read Policy H5 tightly against the Council: matters not written into the policy itself (over concentration) were given limited weight, generous occupancy was accepted where room sizes complied, and the garage conversion to bedrooms was endorsed subject to conditions. For this site the read across is direct: a compliant six person scheme with an integrated garage bedroom, presented through a planning application, sits comfortably inside what the Inspectorate has already accepted a kilometre away. The decision also confirms the conditions to expect on any consent: an occupancy cap, matching materials, retained cycle and refuse storage, and sound insulation where a room faces a noise source.

10. Site Specific Risks

1. Sixth bedroom in a detached outbuilding. Confirmed at the feasibility meeting of 30 July 2026: the layout integrates the garage through the rear extension connection and shows it as an 11.7 sqm en suite bedroom of the house, with the kitchen and dining space providing the internal route and an external door providing escape. A bedroom in the freestanding garage without that connection would have been resisted; the drawn arrangement follows the approved pattern at 07/25/0208/HF and appeal 6001363.

2. Bedroom sizes below Policy H5 minimums. The one local HMO refusal since 2023 failed solely on this. Mitigation: design every single bedroom to at least 9 sqm and any double to at least 13 sqm, measured after excluding en suites, areas behind doors and any ceiling area below 1.5 metres; hold a margin above the minimum on the sketch scheme.

3. Flood Zones 2 and 3 and surface water. The Environment Agency flood map for planning places the site almost fully within Flood Zone 3, with the front of the site in Zone 2 and medium surface water risk. A site specific Flood Risk Assessment by an external assessor is required before the application. Policy W5(IV) requires flood resilient features for intensification within Flood Zone 3, and the ground floor garage bedroom is the sensitive element. Mitigation: obtain the Environment Agency flood level data, appoint the assessor early, set finished floor levels and resilient construction to the assessed level, and verify the garage ceiling height can absorb any floor raise before design freeze.

4. Loft route closed. At approximately 1.8 metres to the ridge the loft cannot meet the 2.13 metre over half floor area standard and no dormer can rescue it economically on a detached hip roof of this height. Mitigation: the scheme must stand on the ground and first floors; do not price or promise loft rooms.

5. Parking after garage conversion. Confirmed at the meeting: the frontage parking space is retained and no side extension toward the frontage is proposed. The garage at 2.5 metres internal width does not meet the council's 3 by 6 metre standard, so its conversion loses no countable space. Officers accepted a 2.5 space shortfall at 109 Northfield Road on weaker accessibility; this site is approximately 250 metres from Cheshunt station.

6. Extension massing on an irregular plot. The left neighbour's encroachment tightens the side dimension and a rear extension faces neighbouring gardens. Mitigation: comply with DSC2 and the Residential Design and Amenity SPG 2025 on depth, height and daylight tests; a measured topographical and boundary survey before design freeze.

7. Unverified agent dimensions. The dining room measurement may include the bay, and the whole floorplan is estate agent sourced. Mitigation: measured survey of the house, garage and garden before any layout is fixed.

8. Refuse strategy. The Waste SPG requires a screened bin store of at least 2.5 by 1.0 metres within 30 metres of the door with a compliant collection point. Mitigation: allocate the store within the front or side curtilage on all drawings; the garage side access lends itself to this.

9. Neighbour objection pressure. HMO applications locally draw six to ten objections on parking, noise and precedent; none has succeeded where standards were met, including at appeal. Mitigation: an HMO Management Plan with any application and early attention to bins, cycle storage and boundary treatment.

11. Recommendations and Mitigation Strategy

1. Route the scheme as a single householder or full planning application for the rear extension, side extension and garage integration while the house remains in C3 use, then complete the C3 to C4 change of use under permitted development once works are done (risks 1 and 4). A lawful development certificate for the use can be obtained for lender comfort.
2. Link the garage to the main house through the side extension so all accommodation sits in one dwellinghouse envelope; do not present a freestanding garage bedroom. Appeal 6001363 confirms garage bedrooms are approvable through a planning application where the garage forms part of the building (risk 1).
3. Design bedrooms to clear margins: singles at 9.5 sqm plus and doubles at 13.5 sqm plus after deductions, with the communal kitchen at 11 sqm or kitchen diner at 12.5 sqm and a living room at 12.5 sqm (risk 2).
4. Commission the Environment Agency flood map product and prepare a proportionate Flood Risk Assessment with finished floor levels and flood resilient construction; check whether any part of the extension footprint touches Flood Zone 3 before fixing the layout (risk 3).
5. Confirm the loft is excluded from the offer to the client and that the appraisal works at six bedrooms on two floors plus the garage link (risk 4).
6. Show three parking spaces on the frontage where the plot allows; otherwise justify against the station at approximately 250 metres (risk 5).
7. Measured survey of house, garage, garden and boundaries before design freeze; verify the dining bay dimension (risks 6 and 7).
8. Provide a screened bin store of at least 2.5 by 1.0 metres and cycle storage, shown on all plans; expect a retained storage condition in the style of appeal 6001363 (risk 8).
9. Prepare an HMO Management Plan for the licence and any application (risk 9).
10. Obtain written confirmation from the Broxbourne duty planning officer that no Article 4 direction applies (Section 5).

Pre application advice: Optional. The change of use requires none, extension precedent is well established, and appeal 6001363 already answers the garage bedroom question in principle. Seek pre application advice only if the design team wants the Council's written view on the linked garage layout before purchase completes.

Documents to accompany the planning application: Design and Access Statement, existing and proposed drawings from measured survey, site specific Flood Risk Assessment, Refuse and Recycling strategy, parking layout plan, and an HMO Management Plan. A Heritage Impact Assessment is not required (no designations) and a Transport Statement is not required at this scale.

12. Sources and References

Local Plan and guidance

- Broxbourne Local Plan 2018-2033 (adopted 23 June 2020), Policies H5 (pages 125-126), DSC1, DSC2, EQ1, W5 (page 150), TM2, TM5: <https://www.broxbourne.gov.uk/downloads/file/1813/local-plan-2018-2033> - accessed 27-07-2026 (full text read from the project copy)
- Broxbourne HMO Amenity Guidance and Statutory Requirements (October 2020): <https://www.broxbourne.gov.uk/downloads/file/1511/the-borough-of-broxbourne-standards-version-oct-2020-1> - accessed 27-07-2026 (project copy)
- Residential Design and Amenity SPG (adopted August 2025): <https://haveyoursay.broxbourne.gov.uk/pl/draft-residential-design-and-amenity-spg/> - accessed 27-07-2026 (project copy)
- Waste Supplementary Planning Guidance (August 2019): <https://www.broxbourne.gov.uk/downloads/file/759/waste-supplementary-planning-guidance-august-2019-final-web-0> - accessed 27-07-2026 (project copy)
- Interim Residential Car Parking Standards (February 2011): <https://parkingstandards.co.uk/Standard/Hertfordshire%20-%20Broxbourne%202011-02-01.pdf> - accessed 27-07-2026 (project copy)
- Interim Policy for Houses in Multiple Occupation (April 2012): cited in Broxbourne officer reports; not published online; request from the Council

Article 4, constraints and supply

- National planning data point queries at the site (Article 4, conservation area, listed building, TPO: zero entities; flood risk zone: level 2 at centre, north and east, level 3 at the western part, none to the south): <https://www.planning.data.gov.uk/entity.json?longitude=-0.0269929&latitude=51.7029583> - accessed 27-07-2026
- LandStack site analysis for title HD167724 (constraints, planning record, title data) - accessed 27-07-2026
- Broxbourne Authority Monitoring Report 2024-25, five year housing land supply 2.81 years: <https://www.broxbourne.gov.uk/downloads/file/4841/authority-monitoring-report-2024-25> - accessed 27-07-2026 via LandStack

Planning applications, officer reports and appeals

- Appeal decision 6001363, 92 Great Cambridge Road (allowed 08/01/2026, Inspector N Bowden): full text retrieved from the council application file for 07/25/0410/F via LandStack (planning application records) - accessed 27-07-2026; text copy saved in 4_RESEARCH/Appeals
- Officer report and decision, 07/25/0190/F, 109 Northfield Road (refused 24/04/2025): LandStack (planning application records), portal <https://planning.broxbourne.gov.uk> - accessed 27-07-2026
- Officer report and decision, 07/25/0423/F, 109 Northfield Road (granted 30/06/2025): LandStack (planning application records), portal <https://planning.broxbourne.gov.uk> - accessed 27-07-2026
- 07/25/0243/LDP, 07/25/0960/LDC, 07/25/0410/F, 07/25/0893/LDP, 07/24/0602/LDP, 07/26/0202/LDP, 07/26/0498/LDP, 07/25/0236/F, 07/24/0221/F: LandStack (planning application records) - accessed 27-07-2026
- HMO Checker report 3024 (link retained; page not machine readable in this environment): <https://app.hmochecker.co.uk/report?reportData=3024>

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Research compiled by Thistle Architecture/KT from official local authority and Planning Inspectorate documentation.