

DEVELOPMENT MANAGEMENT COMMITTEE – 3 FEBRUARY 2016

Application Number	3/15/1952/FUL
Proposal	Erection of three detached dwellings, garages and access road
Location	Land at the Old Station Yard, Windmill Way, Much Hadham, SG10 6BN
Applicant	Swing Ltd
Parish	Much Hadham
Ward	Much Hadham

Date of Registration of Application	08 October 2015
Target Determination Date	03 December 2015
Reason for Committee Report	Called in by Councillor D Andrews at the request of Councillor I Devonshire
Case Officer	Martin Plummer

RECOMMENDATION:

That planning permission be **GRANTED** subject to the conditions set out at the end of this report.

1.0 Summary

- 1.1 The application seeks planning permission for the erection of three detached dwellings on the site which is located outside of the village of Much Hadham and within the designated Rural Area wherein there is a presumption against inappropriate development. The proposal therefore represents a departure to Rural Area policies contained in the Local Plan.
- 1.2 However, in the absence of the Council's five year land supply, regard must be had to the presumption in favour of sustainable development set out in paragraph 14 of the NPPF, and a determination made as to whether there would be adverse impacts arising from the proposed development that would 'significantly and demonstrably' outweigh the benefits of the proposal. The site is well located in relation to village services and Officers consider the proposal to amount to a sustainable form of development and therefore, in accordance with the NPPF, planning permission should be granted, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 1.3 Officers are satisfied that the development would not result in any significant harm to the character and appearance of the site and its surroundings, and its impact would be acceptable in terms of highways,

landscaping, ecological and neighbour amenity issues. It is acknowledged that there would be some reliance on the private car for access to shopping, employment and other services and that some harm would arise from changes to the character and appearance of the area. However, on balance, these matters are not considered to significantly and demonstrably outweigh the benefits of the development in terms of housing provision and it is recommended therefore that, in accordance with paragraph 14 of the NPPF, planning permission should be granted subject to conditions.

2.0 Site Description

- 2.1 The site is located on the south western edge of the Category one village of Much Hadham as shown on the attached OS plan. Properties within Windmill Way are located to the north east, and the more modern development of Millers View is to the south east. A pair of semi-detached properties known as Mill Cottages lie just to the north of the site, whilst to the south west is open agricultural fields. A Public Right of Way (PRoW) – Much Hadham 014 - runs from Station Road to the south of Millers View in a south westerly direction. There is a small collection of residential properties around 500m to the west of the site, where another PRoW (Much Hadham 052) branches off in a south westerly direction.
- 2.2 The site comprises a wooded area of a mixture of various species and other landscape features, although the central part of the site has been relatively recently cleared of some trees. There is a steep bank to the south western boundary and the site therefore sits lower than the adjoining agricultural fields to the south west. Towards the northern part of the site there is some evidence or remnants of buildings and train tracks associated with the former railway/station yard use.

3.0 Background to Proposal

- 3.1 The application site lies to the north of the existing development of Millers View, a development that was constructed in the late 1980's on the site of a former station/coal yard.
- 3.2 In February 1987, outline planning permission was granted for the erection of 10 dwellings on the former coal yard site, combined with the current application site. That outline permission was granted, subject to a s.52 agreement restricting the erection of dwellings to the southern part of the combined site and not within the site to the north west (the current application site). That outline permission was not, however, implemented. Rather than being followed by a related application for

the approval of reserved matters, the owners of the land subsequently submitted a separate application for full planning permission on the southern part of the site only (Ref: 3/87/0666/FP).

- 3.3 That full permission was granted in June 1987 but was not accompanied by a similar s.52 agreement in relation to the land now forming the current application site. It was subsequently implemented and the 10 houses, now forming Millers View were erected pursuant to the full permission.
- 3.4 In September 1988, an application for planning permission was received envisaging the erection of 7 dwellings on the land forming the current application site, together with additional land to the north. However, that application was refused on Rural Area grounds and on the impact of the proposed development on the character and appearance of the area.
- 3.5 The current application seeks permission for three dwellings, on a reduced area of land to that previous refusal and, importantly of course, is submitted some 28 years later under a different planning policy background.

4.0 Key Policy Issues

- 4.1 These relate to the relevant policies in the National Planning Policy Framework (NPPF) and the adopted East Herts Local Plan 2007:

Key Issue	NPPF	Local Plan policy
The principle of residential development within the Rural Area	Paragraph 14	SD2
Impact on character and appearance of the area and neighbour amenity	Paragraph 14	ENV1
Landscaping		ENV2, ENV1 1
Protected Species	Section 11	ENV16

Other relevant issues are referred to in the 'Consideration of Relevant Issues' section below.

5.0 Emerging District Plan

5.1 In relation to the key issues identified above, the policies contained in the emerging District Plan do not differ significantly from those contained in the adopted Local Plan and the NPPF as identified above. Given its stage in preparation, little weight can currently be accorded to the emerging Plan.

6.0 Summary of Consultee Responses

6.1 Herts Ecology comment that an appropriate survey methodology, research and evaluation has been carried out to assess ecology impact. No habitats of any significance will be affected by the proposals. Bats and Roman Snails were recorded as using the site. Mitigation measures to provide 'dark corridors' for bats and translocation of snails away from the development area are sufficient to adequately deal with these protected species. Herts Ecology comment that Bats and Roman Snails should not be regarded as a reason for refusal of planning permission.

6.2 Hertfordshire County Highways comment that they do not wish to restrict the grant of planning permission. They comment that Millers View is a shared surface maintainable at public expense. The new access will require the relocation of a street light. A suitable level of parking is provided together with turning space. Traffic generation associated with the development will not have a significant impact on the highway network.

6.3 The Council's Landscape Officer recommends approval. The Officer comments that the development does not impact to an unacceptable level on significant trees and the building footprints have been arranged outside the protection area of trees. Some concern is raised in regard to the shading of rear gardens likely to be caused by the proximity to trees and it may be better to consider removal of more trees provided this does not result in the loss of enclosure and screening for the overall development. They comment that there will be some negative impact on the existing development at Millers View by removing trees to facilitate the access road. This is the foremost adverse impact but is not sufficient as a standalone reason to object to the planning application.

6.4 The Council's Environmental Health Team advises that planning permission be granted subject to conditions relating to construction hours of working; soil decontamination and piling.

7.0 Parish Council Representations

7.1 Much Hadham Parish Council objects to the application for the following reasons:

- Unduly prominent form of development in the countryside and loss of woodland which helps screen the site and village;
- Conflicts with policies GBC2 and GBC3 of the Local Plan;
- The proposal will result in adverse impacts in terms of the impact on the intrinsic character of the countryside; does not support the transition to a low carbon future by virtue of the number of parking spaces; does not conserve or enhance the natural environment; does not recognise the function of woodland in terms of wildlife and carbon storage.
- The development does not improve the biodiversity of the site;
- The benefits in terms of housing supply do not outweigh the adverse impacts;
- No provision for affordable housing; and approval would not contribute to widening choice of homes in the village
- A s.52 legal agreement relates to the land which prohibits development on the site.

8.0 Summary of Other Representations

8.1 Councillor Ian Devonshire, as the local ward Member, objects to the development proposal and the concerns raised replicate the concerns raised by the Parish Council which are summarised above.

8.2 Letters of representation on both the original plans and amended plans have been received from 20 individual households which, in summary, raise the following issues:

- Previous application for development of the site was refused in 1988
- Loss of habitat for flora and fauna including protected species
- Loss of trees on the site and impact on visual amenity
- Potential for surface water flooding
- No need for more large houses in Much Hadham
- Loss of parking and amenity area to the side of 10 Millers View and increased traffic generation through Millers View and Station Road generally
- Noise and disturbance to residents
- Loss of privacy to properties in Millers View

- Height of buildings out of keeping with Millers View and overbearing
- Disturbance during construction and queries over rights of way on Station Road (which is an unadopted road) and potential damage to the highway
- Access should be restricted to Windmill Way
- Query whether services would cope with additional houses
- A s.52 legal agreement relates to the land which prohibits development on the site.
- Neither Windmill Way nor Station Road is suitable for construction traffic – restriction should be placed on construction vehicle size
- May lead to further development in the future
- Site should be considered through the Neighbourhood Plan process

9.0 Planning History

Ref	Proposal	Decision	Date
3/86/0806/OP	Outline planning permission for 10 detached dwellings (site included both current application site and land which now forms Millers View)	Approval subject to s.52 agreement (not implemented)	10.02.87
3/87/0666/FP	Full planning permission for erection of 10 detached dwellings (application site relates only to land which now forms Millers View)	Approval	24.06.87
3/88/1014/FP	Full planning permission for the erection of 7 dwellings (site included current application site and land to the north west)	Refused	14.09.88

10.0 Consideration of Relevant Issues

Principle of development

- 10.1 The site lies outside the defined village boundary of Much Hadham and therefore within the Rural Area Beyond the Green Belt wherein policy GBC3 only allows for specific forms of development, not including new residential developments. The proposal therefore represents inappropriate development in principle. However, regard must be had to any other material considerations, including policies contained in the NPPF.
- 10.2 Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development and also states that ‘where the development plan is absent, silent or relevant policies are out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.’
- 10.3 The Council has acknowledged its lack of a 5 year housing supply and the need for housing in the district. It is therefore acknowledged that, in respect of the wording of the NPPF, the Council’s settlement boundaries and housing allocations are based on the 2007 Local Plan and are now be considered to be out of date. Whilst work is on-going on the District Plan to provide a full 5 year housing supply, the Plan is still in draft form and can only be given limited weight in the balance of considerations. Officers acknowledge that the proposed development would make a contribution towards the Council’s deficit in housing supply and this weighs in favour of the proposal, but must be balanced against any harm arising from the development.
- 10.4 In terms of sustainability, the proposed development site is located towards the southern edge of the village, but in close proximity to other residential development which is within the boundary of the village. There is access to local services and amenities in the village including a primary school, pubs and some small retailers and other community services including public recreation facilities, village halls and centres. The site is reasonably well located to those services and amenities and is within reasonable walking and cycling distance. The site has a similar relationship and distance to the village’s services and amenities as other dwellings in this part of the village, such as Millers View and Windmill Way. The village is allocated as a Category one village in the Local Plan and is proposed to be designated as a Group One village in the emerging District Plan. Whilst the site is outside the village

boundary it is in very close proximity to other residential development within the boundary and, given the above categorisation of the village as a sustainable location for development, it is considered to be sustainably located for a range of local village services and facilities.

- 10.5 It is acknowledged that the majority of major shopping trips and employment will need to be accessed via the more significant urban centres of Bishop's Stortford, Harlow, Hertford or further afield. There is some access to those centres through use of public transport. However, it is anticipated that the majority of future residents will probably use private motor vehicles, and this does weigh against the development proposal to some degree.
- 10.6 Overall, however, Officers consider that development of this site can be considered to represent a sustainable form of development in terms of economic, social and environmental issues, and the scale of the proposed development is not considered harmful to the capacity of the existing infrastructure and services in the village. In accordance with paragraph 14 of the NPPF, therefore, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the proposal in terms of housing provision. A number of other issues therefore need to be considered in that assessment and these are set out below.

Impact on character and appearance of the area

- 10.7 The majority of representations, including those from the Parish Council and Local Ward Member, raise concern that the development will harm the wooded character and appearance of the site and result in harm to the countryside setting and 'verdant buffer' the site has to the boundary of the village.
- 10.8 The site forms a wooded area and features a number of mature trees and other landscape features which, it is acknowledged, provide a green and pleasant environment to the south western edge of the village.
- 10.9 The application proposes the construction of three dwellings which will be set within the existing levels of the site (which are slightly lower than that of the agricultural land to the west). The dwellings would follow the alignment and building lines set by existing properties within Millers View. The plans submitted also indicate that a number of trees and landscape features to the south western boundary will be retained and can be reinforced with new planting as part of the recommended landscape scheme. Officers are also mindful that none of the trees and

none of the wooded area are protected by tree preservation order or Conservation Area designation of the site, and could therefore be removed in any event without consent from the Local Authority.

- 10.10 Whilst acknowledging the concerns from third parties regarding the impact on the countryside, it is a material consideration that there will be limited public views of the application site in the wider landscape to the west of the site. Much Hadham 014 lies to the south of the site and runs in a south westerly direction. However, there is a significant field boundary which runs from the rear garden of no. 6 Millers View in a westerly direction. This field boundary will be 'thinner' in winter months but it significantly obscures views of the development site from this PRow. The retention of boundary planting and the provision of additional landscape features would further reduce the impact from this public vantage point.
- 10.11 In regards to other public views of the site – the other nearest public vantage point is some significant distance to the northwest from properties and the PRow around Kettle Green. However, the distance and presence of other intervening field boundaries is such that there will be no significant or harmful impact in views from that direction.
- 10.12 The most significant impact will be in views from Millers View and the way in which properties within that street (particularly nos. 9 and 10) experience that environment and Officers acknowledge that there will be some impact here. The Landscape Officer also recognises this but does not consider that the impact is so significant that it would warrant refusal of the application.
- 10.13 In respect of the impact of the development from the surrounding countryside, Officers do not consider that the scale of development, when considered together with the retention of landscape features and the distance/relationship with public vantage points, is such that there would be significant or demonstrable harm to the surrounding area or the views from Millers View.
- 10.14 Turning to the layout, density and appearance of the proposed development, the amended scheme largely seeks to follow that set by other properties in Millers View. This is considered to be an appropriate approach and the proposal demonstrates that it follows that local distinctiveness. Having regard to that consideration the proposed development does not, in Officers opinion, represent an overdevelopment of the site nor does it appear cramped or congested in terms of layout. An appropriate level of amenity and spacing within the proposed development is provided in accordance with policy ENV1

and the development is of a high quality design and layout in accordance with section 7 of the NPPF.

Highways matters and parking

- 10.15 The Highway Authority has commented that the proposed development will have no material impact in terms of traffic flows or highway safety.
- 10.16 The level of off-street parking is considered to be appropriate to the size of the dwellings and is not dissimilar to other parking areas serving properties in Millers View. The development accords with policy TR7 of the Local Plan and the emerging parking policy in the District Plan and will not encourage off-street parking within surrounding streets.
- 10.17 Third parties and the Parish Council raise concern that the development will encourage car use and not reflect the NPPF commitment to move towards low carbon emissions. Officers have acknowledged above the likely reliance on private vehicles for access to the main settlements and further afield for employment and shopping and some negative weight is assigned to this in the overall planning balance.
- 10.18 Third parties also raise concern with the impact on the private road - Station Road, and Officers acknowledge the concerns raised. However, any rights of access onto, or use of, a private road are civil matters for resolution between the relevant parties, and are not material to the determination of this application. If access along Station Road was ultimately to be prevented by the owners of the private road, the application site could still be accessed using Windmill Way to the north and, therefore, from a planning perspective, a suitable means of access can be achieved to the development site and this is the material consideration insofar as access is concerned. The development does not give rise to any significant and demonstrable harm therefore in respect of access or other highways matters. The Highway Authority does not object to the proposal on this ground.

Neighbour amenity impact

- 10.19 The main neighbour amenity consideration relates to the impact of the development in terms of additional comings and goings on the living conditions of existing residents within Millers View and the impact on the living conditions specifically of nos. 9 and 10 Millers View.
- 10.20 The development involves the provision of three dwellings on the site and, in view of this limited scale of development, would not result in a significant number of vehicle or other movements to and from the site. It

is not considered, therefore, that the proposal would significantly impact on living conditions of neighbouring properties in terms of noise and disturbance.

- 10.21 Plot 1 of the proposed development is set 'side-on' to no.9 Millers View with a separation of some 10 metres between the two side elevations of the proposed and existing dwellings. This is an acceptable relationship which follows other properties in the street. The proposed development includes a single high level window on the flank elevation which will look onto the flank and side garden of the neighbour. However, this serves an en-suite and a planning condition requiring this window be obscure glazed would address any potential for overlooking.
- 10.22 The rear garden and rear elevation of no.10 Millers View backs onto the application site and the front elevation of plot 1 contains window openings to main living space on the front (north) elevation. However, having regard to the distance and, more significantly, the orientation between the front elevation of plot one and the rear garden and elevation of no. 10 Millers View, Officers do not consider that there will be a significant impact on the living conditions of this neighbour, such that would warrant the refusal of planning permission.

Ecology

- 10.23 Various concerns have been raised regarding the impact of the development on the biodiversity and ecological impact of the site. Herts Ecology has been consulted on the application and they identify that bats have been identified to use the site for foraging and a collection of Roman Snails have been identified in the ecological survey. However, they advise that these species should not be considered as a reason to refuse planning permission and conditions are recommended requiring translocation of snails and the provision of mitigation for bats in terms of a 'dark corridor' (understood to be an area where trees are retained and free of artificial lighting to encourage bat movements) and bat boxes. Having regard to the comments from Herts Ecology Officers do not consider that there would be a significant impact on any protected species in accordance with policy ENV16 of the Local Plan. Officers consider that a planning condition, as recommended by Herts Ecology, is however both necessary and reasonable in the interests of ecology.

Contamination

- 10.24 Having regard to the existing lawful use of the site and, the comments from the Environmental Health unit, Officers are satisfied that a

condition in relation to contaminated land is necessary and reasonable. No significant harm is, however, identified in respect of this matter.

Other matters

- 10.25 A number of representations have highlighted a legal agreement made under Section 52 of the Town and Country Act 1971 relating to the land which is the subject of this application. (Section 52 agreements were abolished by the Town and Country Planning Act 1990 and replaced with Section 106 agreements with which Members will be familiar). Officers have seen and carefully considered that Section 52 agreement in terms both of its legal and planning status, having taken advice from the Council's Legal Team.
- 10.26 The Section 52 agreement relates to the outline planning permission (ref. 3/86/0806OP) and the key part of that agreement referred to by third parties is a restrictive covenant. The covenant requires that no further development should take place on the land which is the subject of this application. The context of the Section 52 agreement is however exclusive to the granting of outline planning permission ref. 3/86/0806/OP, which was not implemented. A separate, full planning permission for the same site was later granted for 10 houses under ref. 3/87/0666/FP. Officers have reviewed the file and conclude that the later, full application (ref. 3/87/0666/FP) was implemented. No legal agreement was attached with that permission.
- 10.27 Given that the later, full planning permission (ref. 3/87/0666/FP) was implemented, that permission superseded the previous outline planning permission (ref. 3/86/0806/OP) referred to in the s.52 agreement; because the site had already been developed and it was not possible to implement the outline permission. Further, because planning permissions are time limited if not implemented, permission ref. 3/86/0806/OP also eventually expired through time. When ref. 3/86/0806/OP ceased to be valid or capable of implementation, the Section 52 agreement and all the covenants within it effectively became redundant because neither the Council nor any of those parties which are signatures to the Section 52 agreement could reasonably enforce its requirements.
- 10.28 It is important to note that, even if the Section 52 agreement was enforceable or if there was a similar Section 52 agreement linked to the implemented planning permission, its relevance to this planning application and also to the validity/enforceability (in both legal and planning terms) of such restrictive covenant would be subject to scrutiny in the light of current planning policy. For the reasons set out

below, such a restrictive covenant would not survive the changes which have occurred since the 1980s.

- 10.29 The planning policy context has significantly changed since the determination of both applications refs. 3/86/0806/OP and 3/87/0666/FP and that change in the planning policy landscape is set out above in regard to NPPF requirements and housing need. The Council should determine the application on the basis of the current NPPF requirements.
- 10.30 Officers can appreciate that third parties, and in particular those residents of the adjoining residential estate in Millers View who have been furnished with a copy of the Section 52 agreement as part of the conveyancing of their properties, will have assumed from the legal agreement that no development would take place on the application site. However, for the reasons set out above your Officers are of the view that the Section 52 agreement is effectively redundant as it is not able to be enforced.

Affordable Housing

- 10.31 Officers note the concerns raised by the Parish Council in regards to the lack of affordable housing. However, as the site lies outside of the boundary of the village and within the Rural Area there is no policy provision for affordable housing. Furthermore, the provision of a larger number of smaller dwellings on the site would be likely to have more significant implications in terms of loss of landscaping and visual impact on the surrounding area.

11.0 Conclusion

- 11.1 The proposal represents an inappropriate form of development which is contrary to the Council's Rural Area policies.
- 11.2 However, the NPPF sets out that, where Local Plans are out of date in terms of housing supply, there is a presumption in favour of sustainable development, and development should be approved unless the impact of doing so would significantly and demonstrably outweigh the benefits of development.
- 11.3 The proposal is considered to represent a sustainable form of development with reasonable access to village services and favourable weight should be attached to the way in which the development will support the economy and provide housing. Officers acknowledge that there is likely to be some reliance on private vehicles for access to the

main settlements within the District and beyond for shopping, employment and other services and this does weigh against the development proposal.

- 11.4 However, whilst the development will of course have some impact on the surrounding area, an assessment of other relevant material considerations in this case, does not identify any significant or demonstrable harm to the character and appearance of the site or the amenities of neighbouring properties. The impact of the development is also acceptable in highways, ecological and landscape terms.
- 11.5 In accordance with paragraph 14 of the NPPF a balancing exercise has to be undertaken to determine whether any adverse impacts associated with the development would significantly and demonstrably outweigh the benefits.
- 11.6 Officers have undertaken that balancing exercise and have carefully considered the impact of the development against the benefits of the proposal in terms of housing provision. For the reasons set out above, it is not considered that any significant or demonstrable harm would result from the development such as to outweigh to the benefits of the proposal.
- 11.7 Officers therefore consider that, on the balance of considerations, the development can be considered as sustainable and any adverse impacts associated with the development would not significantly and demonstrably outweigh the benefits. Officers therefore recommend that, in accordance with paragraph 14 of the NPPF, planning permission be granted subject to the following conditions.

Conditions:

1. Three year time limit (1T121)
2. Approved plans (2E103)
3. Obscure glazing ()(insert first floor window on south east elevation serving ensuite to plot 1)
4. Hours of working – plant and machinery (6N054)
5. Materials of construction (2E111)
6. Prior to commencement of the approved development, the access and relocation of street lighting column on Millers View shall be completed in

accordance with the approved plans or the satisfaction of the local planning authority.

Reason: In the interests of residential amenity and highway safety in accordance with policy ENV1 of the East Herts Local Plan Second Review April 2007.

7. Provision and retention of parking (3V23) add “and turning of vehicles”
8. Wheel washing (3V25)
9. Hard surfacing (3V21)
10. Landscape design proposals (4P12)
11. Landscape works implementation (4P13)
12. Tree/hedge retention and protection (4P05)
13. Prior to any development details of the translocation of Roman Snails and the mitigation measures for a dark corridor for bats and other associated biodiversity enhancements as set out in Bat Survey June 2015 and Roman Snail Survey dated July 2015 shall be submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out and maintained in accordance with the approved details.

Reason: In the interests of protected species in accordance with policy ENV16 of the East Herts Local Plan Second Review April 2007 and section 11 of the National Planning Policy Framework.

14. Withdrawal of permitted development (Class B, Part 1)
15. Land Contamination (2E33)

Informatives:

1. Other legislation (010L1)
2. Street Naming and Numbering (19SN)
3. Highways works (05FC2)

Summary of Reasons for Decision

East Herts Council has considered the applicant's proposal in a positive and proactive manner with regard to the policies of the Development Plan (Minerals Local Plan, Waste Core Strategy and Development Management Policies DPD 2012 and the 'saved' policies of the East Herts Local Plan Second Review April 2007); the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. The balance of the considerations having regard to those policies and the Council's deficiency in five year housing land supply is that permission should be granted.

KEY DATA**Residential Development**

Residential density	6.4 units/Ha	
	Bed spaces	Number of units
Number of existing units demolished	0	0
Number of new flat units	1	0
	2	0
	3	0
Number of new house units	1	
	2	
	3	
	4+	3
Total		3

Residential Vehicle Parking Provision

Current Parking Policy Maximum Standards (EHDC 2007 Local Plan)

Parking Zone		
Residential unit size (bed spaces)	Spaces per unit	Spaces required
1	1.25	
2	1.50	
3	2.25	
4+	3.00	12
Total required		12
Proposed provision		12

Emerging Parking Standards (endorsed at District Plan Panel 19 March 2015)

Parking Zone		
Residential unit size (bed spaces)	Spaces per unit	Spaces required
1	1.50	
2	2.00	
3	2.50	
4+	3.00	12
Total required		12
Proposed provision		12