



Land at Townfield, Kirdford

Hearing Statement – Matter 4C: Housing

Boyer

Prepared on behalf of Welbeck Strategic Land IV LLP | September 24

REPORT CONTROL

Project:	Land at Townfield, Kirdford
Client:	Welbeck Strategic Land IV LLP
Reference:	18.5149
Document and revision number	IMS-F-08, Revision 2, 01.02.2024
File Origin:	18.5149>8.Submission Records>8.04 Representations
Primary Author	AL
Checked By:	BP

Issue	Date	Status	Checked by
01	09.09.2024	Draft	BP
02	12.09.2024	Draft	BP

TABLE OF CONTENTS

1. Introduction	3
2. Response To Matter 4C – housing	4
3. Conclusion	9

APPENDICES

Appendix 1 – Appeal Ref: APP/H1840/W/23/3333122

1. INTRODUCTION

- 1.1 This Hearing Statement ('Statement') has been prepared on behalf of Welbeck Strategic Land IV LLP ('Welbeck') in relation to the Examination in Public ("EiP") of the Draft Chichester Local Plan 'Proposed Submission' version (January 2023) ('Draft Plan').
- 1.2 The NPPF (2023) sets out, at paragraph 35 the four tests of soundness against which Local Plans are assessed. Our representations focus on the need for the Draft Plan to be positively prepared and be effective particularly in respect of the 'North of Plan Area' ("North Area"), the part of the district to the north of the South Downs National Park (SDNP).
- 1.3 This Statement does not seek to rehearse the documents submitted by Boyer on behalf of Welbeck, as part of the Regulation 19 Stage consultation to Chichester District Council (CDC).
- 1.4 This Statement responds to Matter 4C (Housing), in particular questions 60, 64, 65, 66, 69, 73 & 74.

2. RESPONSE TO MATTER 4C – HOUSING

Q.60 - Is there any substantive evidence to demonstrate that it would be appropriate to plan for a higher housing need figure than the standard method indicates in this case as per advice set out in the PPG (Paragraph: 010 Reference ID: 2a-010-20201216)?

- 2.1 Draft Policy H1 (Meeting Housing Needs) identifies a housing requirement of 10,359 homes across the Plan Period (2021-2039). This is equivalent to 575 dwellings per annum (dpa).
- 2.2 This quantum represents a departure from the current standard method (SM) figure of 11,484 homes (638 dpa) and this reduction is solely predicated on constraints such as the capacity of the A27 (paragraph 5.2, Draft Plan).
- 2.3 However, the Government has published a proposed revised method (30th July 2024) alongside the live consultation on the proposed reforms to the NPPF ('Draft NPPF'). Under the revised method, Chichester's new SM figure is 1,206 dpa, representing an uplift of 568 dpa from its existing SM figure.
- 2.4 The NPPF consultation indicates a clear direction of travel for housing delivery and therefore we consider that planning for less than the existing SM figure is shortsighted, given the road ahead. This position is reflected in the appeal decision relating to the Land to the East of Main Street, WR10 2NL (Ref – APP/H1840/W/23/3333122) (see [Appendix 1](#)). Under paragraph 26 the Inspector notes *"I agree with the appellant that the consultation and the statement indicate a clear direction of travel"*.
- 2.5 In summary, we consider the Council should be aiming to, at the very least, achieve its current SM figure 11,814 homes (638 dpa), recognising that this figure is expected to increase to 1,206 dpa following the adoption of the Draft NPPF. Further justification for this is provided under [Q.65](#).

Q.64 - The justification for the proposed provision of 535 dpa in the southern area has been considered under Matter 4A Transport. Is the proposed figure of 40 dpa in the northern part of the plan area justified?

- 2.6 A total of 679 homes are proposed to be delivered in the North Area (40 dpa). Unlike the southern plan area, the north is not constrained by issues such as a lack of capacity on the A27. As a result, we consider it is imperative that CDC optimises housing delivery in the North Area, which has the potential to make a more significant contribution towards housing supply.
- 2.7 We therefore do not consider the proposed figure of 40 dpa is justified. This position is predicated on three key factors which include, a lack of housing affordability in the north; CDC's inability to meet the SM target of 638 dpa; and the inability of neighbouring authorities to take on CDC's unmet need.
- 2.8 CDC's Housing Economic Development Needs Assessment (HEDNA) (2022 & 2018) (H06 & H08) provide a range of demographic & housing market indicators for North Area. These indicators individually & collectively provide clear evidence of a lack of supply impacting upon housing affordability. Figure 5 of the HEDNA (2018) shows the benchmarking population

growth since 2002 (1.5%) which is also set out in Table 3.8 of the HEDNA (2022). For the North Area, this is the lowest of the whole District and could be an indicator of a lack of or constrained supply of housing in this area.

- 2.9 Furthermore, HEDNA (2018) paragraph 5.62 states *“the highest median house prices over the period have been registered for Plan Area (North) subarea, followed by the SDNP sub-area.”* This trend is reflected in the most recent iteration of the HEDNA (2022) with table 6.4 identifying that the North Area has the highest house prices (and rents) of the District with Lower Quartile prices of £454,000 (against a district average of £305,000) and Lower Quartile rents of £1,070 pcm (against a district average of £775 pcm).
- 2.10 It is apparent the North Area is facing affordability issues. The HEDNA (2022) identifies that in order to buy or rent in the North Area, there is a need for a household income of £90,800 or £42,800, respectively, which is significantly higher than the district average of £61,000 or £31,000 (Table 6.11). Partly as a result of this, the HEDNA (2022) identifies a total need of 46 affordable homes pa (Table 6.16 & 6.23). The need for new affordable homes in the North Area alone exceeds the proposed housing requirement for the North Area (40 dpa) so it is clear this need will not be met by the Draft Plan.
- 2.11 Based on the Council's own evidence, it is clear there are serious supply & affordability issues within the district specifically in the North Area. In addition, we consider that attracting new residents to the area is an important part of ensuring the long-term viability of existing services, an aim of draft Policy P17.
- 2.12 This is particularly important within the context of CDC's inability to meet the SM figure of 638 dpa. Furthermore, the unmet need of 63 dpa cannot be fulfilled by neighbouring authorities, as is demonstrated by paragraph 5.3 of the Draft Plan, which states that *“most of the neighbouring authorities are faced with similar constraints and are unable to assist at this time”*.
- 2.13 We consider a higher number of dwellings should be allocated to the North Area, by increasing the settlement boundary of sustainable settlements such as Kirdford, in order to help CDC achieve its housing need. The role of the North Area will become increasingly important within the context of the revised SM figure of 1,206 dpa.

Q.65 - Would the adverse impacts of the Plan not providing for objectively assessed housing needs significantly and demonstrably outweigh the benefits of doing so when assessed against the policies in the NPPF taken as a whole? That is to say is the overall housing requirement justified?

- 2.14 The sole reason given by the Council for not meeting housing need is the impact of new development on traffic and the increased congestion it would cause. However, whilst there may be some negative consequences on highways as a result of new development, we consider these have potentially been overstated due to the trip rates used.
- 2.15 Therefore, we consider it essential that the Council revisit its Transport Assessment (2024) (TA03.01) to include lower trip rates that are more reflective of current and future travel

patterns. Small adjustments to these rates can have a significant impact on the outcomes of transport assessment reducing the impact of housing growth on the highway network in Chichester. And a result, these adjustments may demonstrate that the degree of harm is not as significant as CDC are indicating.

- 2.16 We consider it is imperative the Council re-looks at this, as delivering its required target of 11,484 homes would avoid a significant shortfall of 1,134 homes (63 dpa) over the plan period. The inability to fulfil this shortfall would be concerning when viewed within the context of CDC not having an existing Five-Year Housing Land Supply (FYHLS). The updated FYHLS (CD07) (2023-2028) position demonstrates that CDC can only demonstrate a 4.19-year supply of housing. The FYHLS is also being contested through current appeals relating to Stubcroft Farm, East of Church Road, West Wittering (App Ref – APP/L3815/W/24/3341520 & APP/L3815/W/24/3341439). Through these appeals, the Appellant argues that CDC are only able to demonstrate a 3.13-year supply.
- 2.17 Secondly, meeting the required housing target will assist in addressing issues of affordability within CDC. As referenced above, the HENDA (2022) notes the North Area is facing major affordability issues (Table 6.11). Table 6.3 notes the need for social & affordable rent in the district is 278 dpa and paragraph 6.152 notes the need for affordable home ownership products is 301 dpa. This issue is only going to get worse by the decision not to meet housing needs in full.
- 2.18 Paragraph 9.15.2 of the Sustainability Appraisal (2023) (SD03.01) also recognises the 'significant negative effects' of unmet housing needs particularly in the context of the wider sub-regional area, as well as the negative impacts on affordability.
- 2.19 Therefore, in summary, we propose that the SM figure (11,484 homes/638 dpa) is used as a minimum.

Q.66 - Paragraph 5.2 of the Plan sets out that the housing requirement would be made up of 535 dpa in the southern area and 40 dpa in the northern area. These figures are not included in Policy H1. Is this effective?

- 2.20 We consider that a single housing requirement is retained for the plan area and is not split between the two locations within Draft Policy H1. The housing requirement is for the plan area as a whole and should be treated as such in policy.

Q.69 – Will there be a five-year supply of deliverable housing sites on adoption of the Plan?

- 2.21 Upon reviewing the Housing Supply Background Paper (2024) (BP07) we consider that CDC will not be able to demonstrate a five-year supply of deliverable housing sites on adoption of the plan.
- 2.22 In calculating its FYHLS, CDC have included the surplus from the preceding years wholly within the next five years. This approach is then included with the Draft Plan, through the 'Council's Suggested Modification Schedule' (2024) (SD10.01), in particular modification reference CM158 to paragraph 5.5. Nonetheless, the Planning Practice Guidance (PPG) is

silent on over-supply, with Inspector's taking different views on whether it should be included within the calculation of the FYHLS.

- 2.23 If the Inspectors consider that surplus can be taken into account when assessing FYHLS, we suggest that the over-supply is spread across the remaining plan period. CDC have instead considered surplus in the same manner as it is required to consider any shortfalls. However, the reason for considering shortfalls in the first five years is to ensure that these are delivered sooner and not pushed back to the end of the plan period. This is to ensure poor performance is addressed sooner rather than later; however, this is not applicable to a surplus, generated from the CDC seeking to meet needs across the plan period as a whole.
- 2.24 We do not consider it to be sound for any surplus to be spread across only one five-year period of the plan. If the surplus generated between the start of the plan period and its adoption in 2025 is spread across the whole of the remaining plan period, our conclusion is that the Council will be unable to demonstrate a five-year land supply (circa 4.64 years based on the Council's five-year assessment). Without additional supply in the first five years after adoption, there is a major risk the plan will be considered out of date on the basis that it does not have a five-year land supply.

Q.73 - What is the justification for the parish housing requirements set out in Policy H3?

- 2.25 Draft Policy H3 (Non-strategic Parish Housing Requirements) allocates a total of 50 dwellings to be provided within the parish of Kirdford. The Draft Plan designates Kirdford as a 'service village'. Service villages are identified as a focus for new development and facilities.
- 2.26 We therefore strongly support the allocation for new homes within Kirdford. However, to ensure sufficient flexibility we recommend the wording of the policy should be updated to state 'at least 50 dwellings' in order to ensure that any opportunities for additional housing can be brought forward, particularly as we consider that there is scope for Kirdford to make a more meaningful contribution towards CDC's housing supply.
- 2.27 Welbeck are currently liaising with the Council on App Ref. 21/00466/OUT, for the delivery of 50 new homes, which will be located immediately adjacent to the southern boundary of the existing settlement of Kirdford. The quantum proposed within this application alone is equivalent to the housing requirement set by Draft Policy H3, thus demonstrating the potential for additional homes within Kirdford.
- 2.28 The Housing Supply Background Paper (2024) (BP07) estimates that the 50-homes allocated in Kirdford would come forward six years after the adoption of the Draft Plan. We disagree and consider these homes can be delivered within the first five years of the plan period, given that there is a live outline application associated with the Site. Development in Kirdford will therefore be able to be delivered far earlier on in the plan than currently envisaged.

Q.74 - Is the statement in the last paragraph of the policy concerning what the Council would do in the event of demonstrable progress not being made in providing for the minimum housing numbers effective?

- 2.29 Draft Policy H3 anticipates that housing will come forwards as part of the respective neighbourhood plans for each parish listed. The policy indicates that where demonstrable progress hasn't been made, the Council will then seek to allocate sites for development within a development plan document. We consider such an approach to undermine the effectiveness of the Draft Plan as it places reliance on the adoption of two separate plans which would protract timescales for the delivery of the homes identified within Draft Policy H3.
- 2.30 This concern can be demonstrated through the lens of the Site which is the subject of these representations. The Site is located within the jurisdiction of Kirdford Parish Council (KPC) which adopted the Kirdford Neighbourhood Plan (KNP) in 2014. The KNP is now outdated, however there has been no recent indication of when a formal review of the KNP will be undertaken. This, in turn, shifts the responsibility onto a potentially forthcoming development plan document, over which there is no clarity with regards to timescales.
- 2.31 We therefore consider that it is imperative that a clear alternative mechanism is set out by the Draft Plan to provide certainty on delivery and therefore to provide an effective approach as per paragraph 35c) of the NPPF.

3. CONCLUSION

- 3.1 This Statement has been prepared on behalf Welbeck Land in relation to the Examination in Public of the Draft Chichester Local Plan ‘Proposed Submission’ version (January 2023).
- 3.2 In accordance with paragraph 35 of the NPPF, we have sought to propose four recommendations to ensure compliance with the four tests of soundness. These relate to Draft Policy H1 and H3.
- 3.3 Firstly, we recommend that the Draft Plan, and therefore Draft Policy H1, adopts the SM figure of 11,484 (638 dpa), in contrast to the proposed requirement of 10,359 homes (575 dpa) across the Plan period. We recognise that the lower figure has been informed by key transport constraints such as a lack of capacity on the A27, however, we consider the benefits of adopting the SM figure would outweigh any harm associated with the highway impacts.
- 3.4 Furthermore, we do not consider the A27 to constitute a constraint to delivering more homes in the North of Plan Area, in particular settlements such as Kirdford. The role of the North Area will become increasingly important within the context of the revised standard method figure of 1,206 dpa.
- 3.5 Regarding highways impacts, we consider that CDC should revisit the Transport Assessment to include lower trip rates that are more reflective of the current and future travel patterns. Such adjustments may indicate that the degree of harm is not as significant as CDC are indicating.
- 3.6 Secondly, within respect to the North Area and based on the CDC’s own evidence it is clear there are serious supply & affordability issues. To ensure that the Plan is sufficiently flexible, we consider that the Council should seek to optimise delivery in the north area, where opportunities exist and therefore raising the 40 dpa target for the northern area. This would ensure that the Draft Plan is positively prepared and therefore consistent with paragraph 60 of the NPPF, in ensuring that it is seeking to meet as much of CDC’s identified housing need.
- 3.7 Thirdly, we strongly support the allocation of 50 new homes within Kirdford. However, to ensure sufficient flexibility we recommend the wording of Draft Policy H3 should be updated to state ‘at least 50 dwellings’ in order to ensure that any opportunities for additional housing can be brought forward. Such an approach to distributing housing would be justified, particularly as areas within the north of the plan area, such as Kirdford, are less constrained and considered appropriate for new development.
- 3.8 Lastly, Draft Policy H3 fails to provide certainty over delivering homes across the various parishes within CDC. The current approach undermines the effectiveness of the Draft Plan, as it places reliance on the adoption of two separate plans which would protract timescales for the delivery of the homes identified within Draft Policy H3.

**APPENDIX 1 – APPEAL REF:
APP/H1840/W/23/3333122**



Appeal Decision

Site visit made on 26 July 2024

by **S Rawle BA (Hons) Dip TP Solicitor**

an Inspector appointed by the Secretary of State

Decision date: 16th August 2024

Appeal Ref: APP/H1840/W/23/3333122

Land to the East of Main Street, Bishampton WR10 2NL

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Build1 against Wychavon District Council.
 - The application Ref is W/22/02070/OUT.
 - The development proposed is an outline application for up to 3 self-build homes. All matters reserved except for access.
-

Decision

1. The appeal is dismissed.

Preliminary Matters

2. As indicated above, this appeal relates to the failure of the Council to make a decision on an application for outline planning permission with all matters reserved except for access. I have determined the appeal on this basis. Illustrative layouts have been provided and I have paid regard to the layouts in so far as assessing the principle of development in land use terms.
3. During the appeal process, the Council have confirmed that they consider that the proposal would conflict with Policy SWDP 2 of the South Worcestershire Development Plan adopted February 2016 (SWDP) as it would not be located in an appropriate location having regard to the settlement strategy and it would conflict with Policies SWDP 21 and SWDP 23 as the proposal would result in back-land development contrary to the existing pattern of development in the village and would not safeguard the countryside. Although they recognised that they could not demonstrate a four-year supply of deliverable housing sites, on balance they considered the adverse impact of the proposed development would significantly and demonstrably outweigh the benefits. I have framed my main issues based on the Council's submissions.

Main Issues

4. The main issues are:
 - whether or not the appeal site is an appropriate location for the proposed development having regard to the settlement strategy and development plan and national policies relating to development within rural areas; and
 - the effect of the proposal on the character and appearance of the area.

Reasons

Whether or not an appropriate location

5. The appeal property comprises land behind existing residential dwellings to the east of Main Street. It is common ground between the main parties that the appeal site is outside the settlement boundary and consequently the appeal site is within the open countryside. Policy SWDP 2 of the SWDP sets out the development strategy and settlement hierarchy and highlights that within the open countryside development will be strictly controlled and will be limited to certain types of development.
6. The appeal site does not meet any of the specific limited types of development set out in SWDP 2. There have been previous relevant appeal decisions¹ which involved two linked cases involving a larger site for more dwellings, but which included the current appeal site.
7. The previous Inspector acknowledged that Bishampton is a suitable location for new development and benefits from a number of services and facilities to meet day-to-day needs which are directly accessible from the site by foot and motor vehicle. I agree. I also note that there is a bus stop within walking distance which provides a service to larger settlements.
8. Consequently, in accordance with the National Planning Policy Framework (the Framework) as the bus service, coupled with the range of day-to-day facilities available in the village within walking and cycling distance, would give future residents a genuine choice of sustainable modes of transport, which would in turn help reduce reliance on the private car. However, ultimately the previous Inspector concluded that that as the developments subject of his appeals would be located beyond the settlement boundary of the village it would not be an appropriate location for housing and the proposals would be contrary to Policy SWDP 2. I agree.
9. I therefore conclude that the proposed development would be located in the open countryside, where Policy SWDP 2 of the SWDP seeks to strictly control development. Consequently, the appeal site is not an appropriate location for the proposed development having regard to the settlement strategy and therefore conflicts with Policy SWDP 2 for the reasons set out above.
10. However, bearing in mind that there are services and facilities within walking and cycling distance and there is an accessible bus service, any harm caused by the conflict would be modest as the proposal would accord with the Framework's aims of promoting walking, cycling and public transport and thus limiting the need to travel. Consequently, I afford this issue moderate weight in the determination of the appeal.

Character and appearance

11. Like the previous Inspector, I observed that the appeal site comprises an agricultural field located on the edge of the village flanked by heavily wooded areas to the north and south. Much of the village is linear with dwellings located along Main Street, however there are some more modern developments with a greater depth, including at Moat Farm Lane and

¹ APP/H1840/W/21/3277955 & APP/H1840/W/22/3291131

Nightingale Fields. I also note that planning permission has been granted for two additional dwellings to the west of Nightingale Fields.

12. Despite these non-linear developments, I agree with the previous Inspector that due to the linear layout on either side of the appeal site and the spacing between houses, including the gap that provides access to the appeal site, the character and appearance of this part of the area derives to a significant extent from the spacious and porous development that provides an appreciation of the open countryside beyond.
13. The appeal site itself has an open, spacious and verdant appearance and acts as an important link between the village and the surrounding open countryside, particularly given the existing footpath that crosses the appeal site. Again, like the previous Inspector I find that the appeal site contributes to the rural character of the surrounding countryside and provides an important setting to the village, despite it not being subject of any local or national designation.
14. In comparison to the previous appeal schemes, the appeal site and the maximum number of dwellings has been reduced. However, notwithstanding that appearance, landscaping, layout and scale are reserved matters and would be confirmed at a later stage, the introduction of up to three dwellings anywhere on the appeal site at whatever scale would result in its harmful urbanisation which would unacceptably diminish its existing open, spacious and verdant appearance. As a result, notwithstanding that the proposal would make efficient use of the site, it would nevertheless result in unacceptable harm to the character and appearance of the area. I afford such harm significant weight.
15. I therefore conclude that the proposed development would unacceptably harm the character and appearance of the area. As outlined, I afford the harm the proposal would have on the character and appearance of the area significant weight. The proposed development would therefore not accord with Policies SWDP 21 and SWDP 25 of the SWDP, which among other things seek to ensure development integrates effectively with its surroundings and are appropriate with the character of the landscape setting.
16. The proposal would also be at odds with the Framework which seeks to ensure development is sympathetic to local character, including the landscape setting.

Other Matters

17. I turn now to consider housing supply. It is common ground that the Council cannot demonstrate an adequate supply of housing land. The Council accept that according to the latest Housing Land Supply Report dated April 2024 the number of years supply was 2.65 years. This is well below Government expectations. Although the proposal would undoubtedly be valuable in boosting housing stock in circumstances where there is an existing shortfall, given that it would result in the addition of only up to three dwellings that tempers its weight.
18. I accept that the proposal would have a cumulative effect in the supply of housing and would have limited economic, social, and environmental benefits. For example, it would provide some jobs and create demand for materials during the construction phase, would broaden the availability of housing in the area and once occupied would support services and local facilities in the village.

19. I note that the proposal would result in up to three additional self-build houses. The Council has a duty under the Self Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) to keep a register of persons who are interested in acquiring a self-build or custom-build plot, and to also grant enough suitable development permissions for serviced plots to meet identified demand for the district.
20. The Framework supports small sites to come forward for self-build and custom-build housing. There is disagreement whether the Council is meeting their relevant duty. The Council sets out that it is granting sufficient permissions and slightly exceeds the cumulative requirement. On the other hand, the appellant considers that the requirement should be about double the Council's estimate. The same argument was advanced in relation to the previous appeal (as referenced previously) and in another appeal in relation to land off Brook Lane² in those cases the relevant Inspector was not persuaded that the Council was meeting its obligations. I have determined this appeal on the same basis.
21. The addition of self-build dwellings on the appeal site would help to address this shortfall. However, again the weight afforded is tempered by the small number of proposed dwellings.
22. I have taken account of the fact that the appellant has made satisfactory arrangements to ensure an adequate contribution would be secured for affordable housing. I also note that the appellant has updated the preliminary ecological appraisal and the newt mitigation strategy, and I am satisfied that suitable mitigation measures could be achieved to ensure the proposal would not harm the ecology of the area, including any protected species. However, given these matters are required to make the proposal acceptable and the proposal is not specifically for affordable housing, they are neutral factors in the determination of the appeal.
23. I also note that the appellant considers that the site has no current use or purpose. However, I am not persuaded that sufficient information has been provided to persuade me that is the case. I have therefore afforded that matter very limited weight.
24. I note that the Council have afforded significant weight to the contribution this proposal would make towards meeting the shortfall in housing supply in the District. However, as outlined, the weight is tempered by the fact that the proposed development only involves up to three additional dwellings. So overall, the totality of the weight I have afforded the benefits associated with the proposal is moderate.
25. In reaching that view I have had regard to the Written Ministerial Statement and draft National Planning Policy Framework published on 30 July 2024. National policies relating to housing land supply are proposed to change as part of this consultation and consequently it has been necessary to consult the parties.
26. I agree with the appellant that the consultation and the statement indicate a clear direction of travel. However, given that any changes are at the consultation stage they can only be given limited weight in the determination of the appeal. That said, even if I were to take account of the proposed changes

² APP/H1840/W/21/3276845

which if implemented would scrap the four-year housing supply target, that would not change the weight I would afford the benefits of the scheme. That is because I have already taken account of the fact that the Council's housing supply figures are well below Government expectations.

Planning Balance

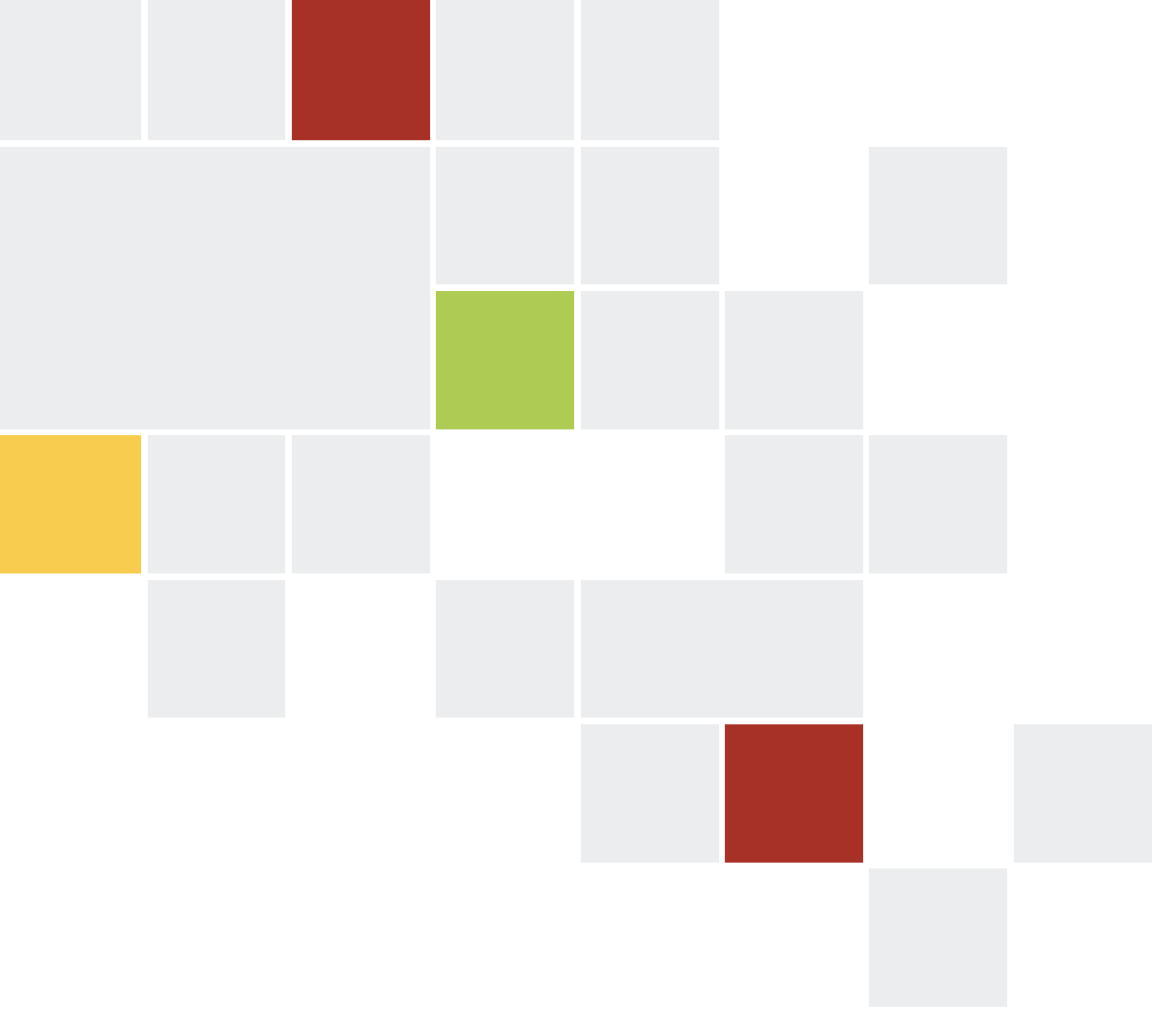
27. I have afforded some matters weight as outlined above and I afford the totality of the benefits moderate weight in the determination of the appeal.
28. On the other hand, I have found that contrary to the relevant policies of the development plan, the appeal site would not be a suitable location for residential development and would have an unacceptably harmful impact on the character and appearance of the area. As a result, the proposal would conflict with the development plan and the Framework as a whole. I have afforded these matters moderate and significant weight respectively, which collectively I afford very significant weight.
29. As set out above, based on the available evidence the Council can only demonstrate a housing land supply of 2.65 years. As a result, Paragraph 11(d) of the Framework is engaged. However, for the reasons set out above, the adverse impacts of granting permission for the proposal would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.
30. I would only add, that even if I had agreed with the Council on the weight to be afforded to the contribution this proposal would make towards meeting the shortfall in housing supply in the District, that would not have changed the outcome as the adverse impacts would have still significantly and demonstrably outweighed the benefits.
31. Consequently, the scheme would not represent sustainable development within the meaning of paragraph 11(d) of the Framework and this weighs substantially against the scheme.
32. I note that in the original planning statement, the appellant listed a number of other appeal decisions. However inadequate details have been provided to allow me to undertake a meaningful review of these. In any event, each case is determined on its own particular merits and the existence of other appeal decisions which inevitably will have differing circumstances does not justify harmful development at the appeal site.

Conclusion

33. The proposal conflicts with the development plan and the material considerations do not indicate that the appeal should be decided other than in accordance with it. I therefore conclude that the appeal should be dismissed.

S Rawle

INSPECTOR



120 Bermondsey Street, London, SE1 3TX | 0203 3268 2018
london@boyerplanning.co.uk | boyerplanning.co.uk

Boyer