

## Appeal made by Gleeson Land Ltd

## Land East of Knowle Lane, Cranleigh

(also referenced as 'Land Centred Coordinates 505938 138328, Knowle Lane, Cranleigh')

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### Statement of Case

Prepared by Gillings Planning, on behalf of the Appellant

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July 2023



## Contents

1. Introduction and Background
2. Appeal Site Context and Proposed Development
3. The Planning Application Process
4. Policy Context
5. Main Issues for the Inquiry
6. The Appellant's Case
7. Summary and Conclusion

Appendix 1: Revised Landscape Masterplan, Revised Illustrative Masterplan & Illustrative Green Links plan

Appendix 2: Agricultural Land Classification Report

Appendix 3: Further ecological surveys confirmation

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Project Ref: GLEE1001 – Cranleigh - Appeal

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# 1. Introduction and Background

- 1.1 This Statement of Case (SoC) has been prepared on behalf of Gleeson Land Ltd (*“the Appellant”*), in support of an appeal against the refusal of an outline planning application (ref: WA/2023/00294) by Waverley Borough Council (*“WBC” / “the Council”*) on 8<sup>th</sup> June 2023, for proposed development of the Site known as land to the East of Knowle Lane, Cranleigh (*“the Site”*).
- 1.2 This Statement has been prepared on the basis that an Inquiry is requested and in accordance with the relevant guidance, contained in the *Procedural Guide: Planning Appeals – England*, last updated 13<sup>th</sup> June, and the criteria for determining appeal procedures 21st April 2022. In this context, Proofs of Evidence, will follow and lodged in accordance with prescribed timescales in advance of the Inquiry.
- 1.3 This Statement should be read in conjunction with the other documents submitted with the appeal at this time, including a draft Statement of Common Ground (*“SoCG”*) and draft Landscape Statement of Common Ground (*“LSoCG”*), prepared on behalf of the Appellant. It is the intention of the Appellant to co-operate with the Council in preparing Agreed Statements of Common Ground on additional matters as necessary (e.g. heritage matters and housing land supply) in accordance with the Inquiry procedure.
- 1.4 The SoC forms part of the appeal submission and sets out the Appellant’s case, which will be presented at the appeal. The Appellant reserves the right to add to the matters contained in this SoC.
- 1.5 A draft list of Core Documents has been submitted as part of the appeal package – these are the documents that will be referred to during the course of the appeal and are listed in the SoCG. The Appellant will seek to agree a list of Core Documents prior to the submission of Proofs of Evidence and the list of Core Documents may be added to by the Appellant or the Council during the appeal.

## Appellant

- 1.6 Gleeson Land was established in the 1990s. Where Gleeson Land is a land promoter, it forms part of the MJ Gleeson plc, which has been creating homes and community facilities for almost 120 years. Gleeson Land provide a personal and bespoke approach to each project, with the Senior Management Team being closely involved at every stage of the process, and works closely with landowners and their representatives through the planning and sale process to deliver value driven outcomes that enable the creation of beautiful homes and places.
- 1.7 As set out in paragraph 6.62 of the Planning Statement, it has been recognised in a recent appeal that Gleeson are a ‘established Site promoter that has a strong track record of delivery’.

## Planning Application

- 1.8 The Appellant submitted an outline planning application to the Council for the following:  
  
*Outline Application with all matters reserved except access for erection of up to 162 dwellings (including 30% affordable dwellings) built in up to 3 phases including access road, pedestrian and cycle accesses, parking, public open space, biodiversity enhancement and landscaping and other associated infrastructure and works.*
- 1.9 The application was registered (under LPA ref: WA/2023/00294) by the Council on 31<sup>st</sup> January 2023. During consideration of the planning application, the Council undertook consultation with all relevant statutory and non-statutory bodies.

### Reasons for Refusal

1.10 The planning application was refused under delegated powers by Officers on 8<sup>th</sup> June 2023.

1.11 The decision notice includes 8 reasons for refusal, summarised as follows:

- i) harm to character and appearance of the area and harm to visual amenity;
- ii) harm to heritage which is not outweighed by the public benefits;
- iii) lack of s106 – specifically in relation to affordable housing;
- iv) insufficient information on housing mix;
- v) harm to existing and proposed trees and insufficient provision of trees;
- vi) insufficient information on protected species;
- vii) insufficient information on self and custom build housing, and
- viii) insufficient information on loss of best and most versatile agricultural land.

## 2. Appeal Site Context and Proposed Development

### Site and Planning Context

- 2.1 The Appellant has set out a description of the Site and its surroundings in its draft SoCG, lodged alongside this SoC.
- 2.2 There is no associated or relevant planning history across the whole Site of relevance to the appeal proposal.
- 2.3 Since the determination of the application on 8<sup>th</sup> June, a Tree Preservation Order has been made on 13<sup>th</sup> June. Objections were duly made within 29 days. Details are noted within the SoCG.

### Appeal Proposal

- 2.4 The appeal proposals are set out in detail in the Design and Access Statement and Planning Statement that accompanied the planning application – both of which should be read alongside this appeal submission.
- 2.5 In summary, this appeal seeks outline permission (with all matters reserved, save for access) for residential development, where the proposals include for up to 162 dwellings (within Use Class C3). Matters relating to Appearance, Landscaping, Layout and Scale are reserved for later determination.
- 2.6 The Development Proposals briefly comprise the following, including a series of parameters to control future reserved matters applications,

- Development of the Site of 11.7 ha.
- Access to the Site, as shown on plan refs:
  - 2010010-04 rev C Proposed Access Arrangement and Visibility Splay;
  - 2010010-07 Proposed Arrangement of Pedestrian / Cycle Route; and
  - 0350-L10 Access Junction Landscape Proposals Plan.
- Land Uses proposed on the Site, as shown on plan ref: 1321.03 Parameter Plan:
  - Residential uses (across 5ha):
    - up to 162 no. dwellings in Use Class C3 which includes 5% self build or custom build and 30% affordable housing;
    - density of 32 dwellings per hectare; and
    - storey heights up to 2.5 storeys.
  - Green Infrastructure (across 6.7ha):
    - natural and semi-natural greenspace (including SuDS and structural landscaping);
    - amenity greenspace, parks & gardens (with informal play space & a LEAP); and

- biodiversity improvement areas.
  - A three-phased development approach, as shown on plan ref: 1321.04 Phasing Plan.
- 2.7 The plans for approval are:
- Location Plan ref 1321.01
  - Proposed Access Arrangement and Visibility Splay ref 2010010-04 rev C;
  - Proposed Arrangement of Pedestrian / Cycle Route ref 2010010-07;
  - Access Junction Landscape Proposals Plan ref 0350-L10 (in so far as it relates to the detailed matter of access);
  - Parameter Plan ref 1321.03, and
  - Phasing Plan ref 1321.04.
- 2.8 In addition, an Illustrative Masterplan (plan no 1321.02) and a Landscape Strategy Plan (plan no 0350 L4) were submitted for illustrative purposes only demonstrating one way in which the proposed development could come forward in accordance with the Parameters Plan.
- 2.9 To support this SoC, the following are submitted:
- a Revised Illustrative Masterplan (plan no 1321.02A), a Revised Illustrative Landscape Strategy (plan no. 0350 L4 C) and an Illustrative Green Links plan (plan no 0350 L5 A) (**Appendix 1**) have been prepared which seek to identify how concerns raised in respect of trees can be accommodated, to identify green linkages and to identify a potential location for the self and custom build houses;
  - an Agricultural Land Classification Report (**Appendix 2**);
  - a Note to confirm the further ecological surveys that have been undertaken, which confirm the previous findings (**Appendix 3**)
- 2.10 As noted, 30% of the dwellings are proposed to be affordable. The mix of those units was not confirmed at application stage. However, this is proposed to be agreed through the SoCG and draft s106 process.
- 2.11 A request for a Screening Opinion was registered in November 2022 but has not yet been determined. However, it is noted that the application was determined on the basis the LPA consider the proposal is not EIA development and an Environmental Assessment is not required. The Screening Opinion will be included in the SoCG when received.

### 3. The Planning Application Process

- 3.1 The application as submitted is described within the Planning Statement.
- 3.2 Since the application was submitted and to respond to the comments of consultee the Appellant provided additional information as set out in the table below.

**Table 3.1: Information Submitted During Application**

Date	Information Submitted	Reason for Submission
1 <sup>st</sup> March 2023	Rebuttal to LLFA Response, prepared by Abley Letchford Partnership (document ref: A423-R003)	Lodged in response to Surrey County Council (Lead Local Flood Authority) consultation response (ref: LLFA-WA-23-0192) dated 9 <sup>th</sup> February 2023
30 <sup>th</sup> March 2023	Statutory Consultee Comments – with Applicant Response, prepared by Gillings Planning  (lodged by email to Case Officer from Gillings Planning)	Response to all points raised by Statutory Consultees at that point in time
24 <sup>th</sup> April 2023	Rebuttal to Surrey Wildlife Trust response, prepared by Gillings Planning and Aspect Ecology	Response to the comments re: ecology matters made by the Surrey Wildlife Trust, dated 24 <sup>th</sup> March 2023
9 <sup>th</sup> May 2023	Rebuttal to Bellamy Roberts Highway & Transportation Considerations Report, prepared by Motion (document ref: TN08)  (lodged by email to Case Officer from Gillings Planning on 17 <sup>th</sup> May)	Response to the points raised by Bellamy Roberts (on behalf of the Knowle Lane Neighbourhood Group) in its report entitled ‘Highways and Transportation Considerations’ (March 2023) and lodged as an objection to the planning application.
9 <sup>th</sup> May 2023	Flooding and Drainage Technical Note, prepared by Abley Letchford Partnership (document ref: A423/TN001)	Provided to the LPA in response to comments made by third party representations (including Cranleigh Parish Council) with regards drainage matters.
11 <sup>th</sup> May 2023	Rebuttal to Manorwood Heritage Impact Assessment, prepared by	Response to the built heritage considerations raised in the Heritage Impact Assessment provided by Manorwood dated

Date	Information Submitted	Reason for Submission
	<p>RPS (document ref: JCH01430/BH/i)</p> <p>(lodged by email to Case Officer from Gillings Planning on 17<sup>th</sup> May)</p>	<p>April 2023 and lodged as an objection to the planning application.</p>
<p>17<sup>th</sup> May 2023</p>	<p>Rebuttal to Housing Officer response re: Affordable Housing provision</p> <p>(lodged by email to Case Officer from Gillings Planning)</p>	<p>Response to the points raised by Housing Officer (re: Affordable Housing matters) – also included summary of the RPS (re: Heritage matters) and Motion (re: Highway matters) reports.</p>
<p>5<sup>th</sup> June 2023</p>	<p>Rebuttal to Parish Council response</p> <p>(lodged by email to Case Officer from Gillings Planning)</p>	<p>Tabular summary of responses to the points raised by the Cranleigh Parish Council.</p>

- 3.3 No response was submitted to the landscape or heritage comments, as it was anticipated these matters would be addressed at appeal and the responses were provided by the LPA shortly before determination.
- 3.4 Information was not requested from the Appellant on housing mix, self and custom build or agricultural land.



## 4. Policy Context

### Policy Context

- 4.1 The draft SoCG also includes the planning policies of relevance to the appeal, contained in:
- WBC Local Plan Part 1: Strategic Policies and Sites (adopted February 2018) (“LPP1”); and
  - WBC Local Plan Part 2: Site Allocations and Development Management Policies (adopted March 2023) (“LPP2”).
- 4.2 As noted in the draft SoCG, the LPP2 had not been adopted at the time the planning application was submitted but had been adopted by the time the planning application was determined. Reference across the planning application submission documents to the Local Plan 2002 can be disregarded, where those policies are replaced by the LPP1 and LPP2.
- 4.3 The Appellant is aware that permission has been granted to proceed with a claim for statutory review of LPP2 in July 2023. An updated position will be reported within the SoGC.
- 4.4 Cranleigh Parish Council is preparing a Neighbourhood Plan (NP). A Regulation 14 consultation was undertaken between August and October 2021 on the draft (Pre-Submission) Neighbourhood Plan, with a further focussed Reg 14 consultation undertaken on the draft Plan between February and March 2023. Further, a Regulation 16 version of the Neighbourhood Plan has been submitted but not yet published for consultation. The NP is (correctly) not referenced in the reasons for refusal.

### Other Material Considerations

- 4.5 The Council acknowledges that it does not have a 5 year supply of housing. This is addressed in the SoCG.

## 5. Main Issues for the Inquiry

5.1 The purpose of the Inquiry will be to address the reasons for refusal as set out above.

5.2 Thus, the Appellant anticipates that the main issues will be:

- compliance with the spatial strategy
- alleged harm to character and appearance of the surrounding countryside, Knowle Lane and the local settlement pattern
- alleged heritage harm
- alleged harm to trees
- alleged harm to protected species
- alleged harm to the loss of agricultural land
- the Planning Balance, and specifically the tilted balance
- S106 matters including affordable mix, self and custom build provision and affordable housing provision

5.3 The Appellant notes third party comments which focus on highway matters. Although not a reason for refusal this is likely to form a secondary issue.

### Evidence to be submitted to the Inquiry

5.4 Accordingly, the Appellant proposes to submit Proofs of Evidence, prepared by Expert Witnesses to be called to the Inquiry to present evidence on:

- i) Planning matters – prepared by Gillings Planning;
- ii) Five-Year housing land supply – prepared by Gleasons;
- iii) Affordable Housing – prepared by ToR;
- iv) Socio-Economic benefits – prepared by Turley;
- v) Landscape matters – prepared by David Williams Landscape Consultancy or DWLC;
- vi) Heritage matters – prepared by RPS;
- vii) Design matters – prepared by Richards Urban Design;
- viii) Ecology matters – prepared by Aspect;
- ix) Tree matters – prepared by Aspect;
- x) Transport and Highway matters – prepared by Motion;

5.5 It is the Appellant's intention to enter into a s.106 planning obligation to address matters relating to affordable housing. The Appellant will consider the necessity for the provision of any further or additional evidence to address that of other parties at the time at which is received.

## 6. The Appellant's Case

6.1 The Appellant's case is made on the basis that the proposal is in accordance with the Development Plan read as a whole.

### Compliance with the Development Plan

6.2 Evidence will be submitted to argue that the proposal accords with the Development Plan, as follows:

- The proposal complies with SP1 – Sustainable Development as:
  - the proposal is in a sustainable location. Evidence will be submitted by the Appellant's witness on Highways to demonstrate sustainable transport options are available;
  - the proposal is in a suitable location for growth. Although outside the settlement boundary, the Site lies outside the Green Belt and the AONB;
  - this is understood to be accepted by the Council as this policy is not identified in any reason for refusal.
- The proposal complies with SP2 – Spatial Strategy as:
  - the policy and supporting text allows for the expansion of settlements on suitable sites on the edges of settlements. Further, the policy allows for development 'at' Cranleigh as a highest order settlement. The Appellant believes the Council agrees that the application does not conflict with this part of the policy;
  - one part of the policy seeks to protect land with the 'highest' amenity and landscape value, 'such as AONB and Green Belt'. The Council appear to allege non-compliance on this basis. Evidence will be submitted that this landscape is not 'the highest value' and therefore the scheme complies with SP2.
- The proposal complies with ALH1 – Housing numbers as:
  - the policy is expressed not as a cap – but a minimum;
  - this is understood to be accepted by the Council as it is not included as a reason for refusal.
- The proposal complies with HA1 and DM20 – Heritage as:
  - less than substantial harm is identified to the significance of three identified designated heritage assets. This level of harm is at the lower end of the spectrum of less than substantial harm in relation to West Barn and The Brew, and negligible to Coldharbour Farmhouse. Evidence will be submitted on this point.
- The proposal complies with NE2 and DM11 – Trees as:
  - existing trees, woodland and hedges can be fully protected;

- green linkages are provided and retained. This is clearly demonstrated on the illustrative Green Links Plan included at **Appendix 1** which shows a rich network of both existing and proposed green links, marking a betterment over the existing position;
  - there will be adequate separation between proposed trees and proposed built form, and
  - the Revised Illustrative Masterplan and Landscape Strategy demonstrate how this be accommodated and properly addressed at the RM stage without the Site being overdeveloped.
- The proposal complies with NE1 – Ecology as:
    - sufficient evidence has been provided to demonstrate no harm to protected species. Harm is alleged in the delegated Officer’s report to bats, dormice and Great Crested Newts in so far as evidence has not been submitted to demonstrate no harm would occur. As noted in section 3 above, a response was submitted to the LPA and since that time further surveys have been undertaken to confirm the findings. A Note on those surveys is included at **Appendix 3**. The points raised (and addressed in the note) are in relation to:
      - Tree T10 - The Officer report references T10 and suggests that further surveys are required to conclude that bat roosts are either likely absent or present in that tree. This is a fallen, long-dead tree in the centre of a field and will be relocated to a retained or newly created habitat at the boundary of the Site. Prior to being moved this feature can be surveyed to confirm whether or not it is used by bats, and hence whether or not a licence is required in order to move it, and any detail regarding its placement within the detailed design. This could have been controlled through an appropriately worded condition. In any event, further complete surveys have been undertaken, which confirm that, as expected, T10 does not support roosting bats. As such, sufficient information is provided.
      - Bats - further clarity is sought by the Council that bats across the Site have been assessed. Evidence will be submitted to conclude that sufficient information has obtained to assess levels of bat activity sufficient to inform the proposals, which will retain and strengthen habitats that are used by bats throughout the Site area.
      - Dormouse - evidence will be submitted to demonstrate that Dormouse tubes were deployed in all hedges throughout the Site with potential to support dormouse, where safe to do so. The surveys conformed to standard guidance (which does not require surveys to be undertaken in all months of the year). No evidence of Dormouse was found. There are no records of Dormouse within 2km of the Site. It is reasonable to conclude on this basis that Dormouse is absent from the Site. To confirm this position, further Dormice surveys are underway and will be reported in the SoCG in due course before the start of an Inquiry.
      - Great Crested Newts - there are no ponds on Site and the proposals will not result in the loss of ponds. The only measures in respect of this species that may be required are in respect of effects on terrestrial habitats. The Ecological Appraisal stated that further surveys would inform the approach that may be taken during construction but this level of information is not required prior to determination as it has been confirmed that this species is present. Should subsequent detail of the

proposals indicate that effects on habitat suitable to support Great Crested Newt, which is linked to ponds supporting this species, are likely to occur it may be necessary to obtain a Natural England European Protected Species Licence to inform construction methods, and if so more detailed information is likely to be required at that time. Currently, there is sufficient information to be able to say that no Great Crested Newt breeding pond would be affected and the extent to which terrestrial habitats are likely to be affected in the context of the wider occurrence of such habitat and the provision of suitable habitat post-development means that effects on Great Crested Newt populations are unlikely.

- As such, the proposal complies with NE1 as there would be no harm to protected species and appropriate conditions can be applied.
- The proposal complies with DM15 – Agricultural land as:
  - the Site comprises Grade 3b land and does not include the ‘best and most versatile Agricultural land’ as confirmed by **Appendix 2** (to be agreed as part of the SoCG).
- There is only limited conflict with RE1 and RE3 – Countryside beyond the Green Belt:
  - Policy RE1 requires the ‘intrinsic character and beauty of the countryside to be ‘recognised’. The Appellant will argue this ‘intrinsic character and beauty’ has been recognised and there is compliance with this part of the policy;
  - it is recognised that RE1 also requires the ‘intrinsic character and beauty’ to be safeguarded. A degree of limited conflict is accepted, albeit landscape evidence will be presented to confirm that there will be no significant adverse impact in the long term. This is addressed further below;
  - the Council alleges non-compliance with Policy RE3 in the decision notice, but not within the Officer’s Report. The Appellant will argue that there is no conflict with RE3 as it’s only relevant in respect of (iv – Area of Strategic Visual Importance) and no development is proposed in that area.
- There are no other reasons for refusal, confirming compliance with all other matters including highways and drainage for example.

#### Application of the tilted balance

- 6.3 Alternatively, if the Inspector considers the proposal does not comply with the Development Plan, the policies most important for determining the appeal, namely SP1, SP2, ALH1, RE1, are out of date (including because the Council cannot demonstrate a 5 year supply of deliverable housing land) and paragraph 11(d) of the NPPF applies (the ‘Titled Balance’). Further, the alleged harm does not significantly and demonstrably outweigh the benefits of the development.
- 6.4 The Appellant considers that any heritage harm is not sufficient to disengage the tilted balance which still applies. However, if the Inspector concludes otherwise, even on the ‘flat balance’, the harms do not outweigh the benefits.

## *Harm*

### 6.5 Turning firstly to landscape harm:

- Settlement pattern – the Appellant’s case is that the proposed development follows the existing irregular patterns of the landscape and does not cause harm.
- In respect of landscape character – by reference to the Report on Landscape and Visual Matters (the Landscape Report) the Appellant’s case is that:
  - the Appeal Site forms a very small pocket of land lying on the fringe of the ‘Wooded Low Weald’ (WLW) landscape type and ‘Dunsfold to Pollingfold Wooded Low Weald’ landscape character area (Area WW6) as defined by the Surrey Landscape Character Assessment: Waverley Borough April 2015;
  - the Appeal Site does not lie within any national or local landscape designation and does not comprise a ‘valued’ landscape;;
  - contrary to the Council’s assertion, the proposed quantum of residential development can be accommodated on the Appeal Site without unacceptable levels of harm to the landscape. The proposed development would result in a change in the character of the land, but it would not be uncharacteristic or alien to the area and with the introduction of new planting and appropriately scaled development, together with the set back of built form from the Site’s boundaries, there would be no substantial long term adverse impact on the landscape character;
  - the location and extent of the proposed development and the landscape mitigation strategy have been carefully considered from the outset, as part of a sensitive landscape-led approach to ensure that the development can be successfully integrated into the receiving landscape and visual environment and would not result in an unacceptable encroachment into the countryside;
  - there are no significant landscape effects/harm at either year 1 or year 15.;
  - the proposed development will have some temporary, very localised visual impacts, effects on a short sections of Public Footpath No. 379 through the Site, but the effects of the development on character and visual appearance of the wider countryside and longer distance views will not be significant in the long-term as the proposed development would not erode or harm the special qualities or key landscape characteristics of the area
- In respect of heritage –any identified harm is no higher than at the lower end of the less than substantial harm spectrum and is outweighed by the public benefits.

## *Benefits*

### 6.6 Turning to benefits, the Appellant’s case is that:

- Substantial weight should be given to the:
  - contribution and early delivery of market housing –in circumstances where there has been significant undersupply as demonstrated by the lack of a 5 year land supply;

- self-build and custom build plots to be secured through appropriate s106 and conditions, and as shown on the Illustrative Masterplan where an appropriate area for 5% or 9 units can be reasonably accommodated (as included at **Appendix 1**);
  - provision of affordable housing;
  - open space provision – with Green Infrastructure extending over half the site area); and
  - ecological enhancement and significant overprovision of Biodiversity Net Gain compared to the requirement for 10%.
- Moderate weight should be given to:
    - supporting local services;
    - off-Site contributions to infrastructure;
    - socio-economic benefits (which will be detailed in evidence); and
    - sustainability benefits.

6.7 The Appellant’s case is that these benefits substantially and demonstrably outweigh any harm.

#### Planning Obligations and Conditions

6.8 Infrastructure requirements arising are proposed to be addressed by the Community Infrastructure Levy (“CIL”)

6.9 However, it is also proposed that the following matters will be secured by way of s106:

- provision of on-Site affordable housing, including mix;
- provision of equipped play and public open space;
- provision of highways infrastructure improvements and public transport measures;
- education and libraries; and
- self and custom Building

6.10 A completed S106 Agreement will be available for the Inspector to review at the Inquiry.

6.11 In terms of planning conditions, these are proposed to be agreed within the SoCG before the commencement of the Inquiry.

#### Third Party Representations

6.12 At the time of preparing this Statement, the Council had received a total of 362 no. representations from residents objecting to the application.



- 6.13 The matters covered in the representations relate to the principle of development outside the settlement boundary, impact on the countryside/views, harm to heritage, highways and infrastructure requirements, in addition to other related matters.
- 6.14 These matters are covered in the Appellant's case above, the Statements of Common Ground, or addressed in the Officer's Report and are not therefore repeated in this section.
- 6.15 The Appellant does however reserve the right to respond to any new representations received by the Planning Inspectorate in relation to the Appeal that raise matters not already covered in this Statement of Case.

## 7. Summary and Conclusion

- 7.1 The Appellant's primary contention is that proposal accords with the development plan read as a whole and there are no material considerations which indicate the proposal should be determined otherwise.
- 7.2 In respect of the reasons for refusal, there is limited landscape harm which is outweighed by the landscape and biodiversity benefits of the scheme and thus reason for refusal 1 is misconceived, and the public benefits outweigh any heritage harm such that reason for refusal 2 is unfounded.
- 7.3 Reasons for refusal 5 (trees) and 6 (protected species) are unfounded and in any event can be addressed by condition, and reasons for refusal 3 and 4 (affordable housing provision and mix) and 7 (self build) are anticipated to be resolved through the submission of a s.106 obligation. Finally, reason for refusal 8 can be removed now it has been demonstrated that the agricultural land value of the Site is Grade 3b land.
- 7.4 Even if it is considered the proposal does not comply with the development plan as a whole, the titled balance applies and the harms do not significantly and demonstrably outweigh the benefits.
- 7.5 Thus, permission should be granted without delay in accordance with the Development Plan and paragraph 11(c) of the NPPF.