



APPEAL DECISION WITH REGARD APPLICATION FOR PLANNING PERMISSION IN PRINCIPLE 21/00252/PPP, FOR RESIDENTIAL DEVELOPMENT, FORMATION OF ACCESS ROADS AND CAR PARKING, A SUSTAINABLE URBAN DRAINAGE SYSTEM AND ASSOCIATED WORKS AT LAND AT STOBS FARM, LADY BRAE, GOREBRIDGE.

Report by Chief Officer Place

1 PURPOSE OF REPORT

- 1.1 The purpose of this report is to advise the Committee of an appeal decision with regard an application (21/00252/PPP) for planning permission in principle for residential development, formation of access roads and car parking, a sustainable urban drainage system (SUDS) and associated works on land at Stobs Farm, Lady Brae, Gorebridge.

2 BACKGROUND

- 2.1 The stated planning application was subject to an appeal for non-determination as it had not been determined by the local planning authority within the statutory period of time as set out in the application report presented to the Committee at its meeting of 15 March 2022.
- 2.2 At its meeting of 15 March 2022 the Committee determined to invite the Scottish Government Reporter appointed to determine the appeal to refuse planning permission – the Reporter dismissed the appeal and refused planning permission. A copy of the appeal decision is attached to this report.
- 2.3 The planning application was subject to 56 objections and an objection from the Gorebridge and District Community Council.

3 THE DECISION

- 3.1 In reaching a decision to refuse planning permission because of the developments potential impact on the landscape and visual amenity the Reporter concluded “I find the proposal would represent an undesirable and excessive incursion of development in a highly prominent part of the landscape, giving rise to significant adverse landscape and visual effects to the detriment both of the character of Gorebridge and its setting, and by virtue of the development’s influence upon wider areas of countryside. On this basis, the development would

fail to accord with criterion (a) of SESplan policy 7, and it would also be contrary to LDP policy ENV 7 ('Landscape character')".

- 3.2 However, in reaching the decision, which aligned with the Committee's aspirations, the Reporter did reach two other significant conclusions, one with regard effective housing land supply and the second with regard meeting demands on education capacity.
- 3.3 The first significant conclusion relates to the Council's housing land supply position. The Reporter concluded that because the Council does not have any housing targets beyond 2024 (because Scottish Government Ministers rejected SESplan2 on transportation grounds, not housing targets, SESplan1 is considered out of date and Scottish Ministers have delayed adopting National Planning Framework 4 (NPF4), which will set Midlothian's new housing targets) it is automatically assumed Midlothian has an effective housing land supply shortfall. This is despite the Reporter acknowledging there is no Scottish Government methodology to work out an effective housing land supply, the lead Reporter in assessing Midlothian's Local Development Plan at examination in 2017 concluding the Council had an effective housing land supply and subsequent Housing Land Audits (agreed by Homes for Scotland – the umbrella group for the house building industry) confirmed Midlothian had an effective housing land supply and that the proposed development will not automatically contribute to the pre 2024 targets.
- 3.4 Although the Reporter's conclusion on the Council's effective housing land supply position can be considered to be unreasonable and in the immediate future it leaves the Council vulnerable to other housing appeals (at present no other appeals are pending), it is only a temporary situation until NPF4 is adopted, and although the deadline has slipped on a number of occasions the Scottish Government's latest commitment is to adopt NPF4 in autumn 2022. NPF4 will set new housing targets for Midlothian, the draft NPF4 was setting an annual supply target of 805 units a year.
- 3.5 With regard the second significant conclusion which related to education capacity, the Reporter stated "I do not consider it to be satisfactory for the Council to indicate that there is an education capacity problem but fail to present solutions to it (whether temporary or permanent)". In effect, if a developer is proposing to fund an education solution to a restriction on education capacity, the Council should identify a solution rather than refuse a planning application on education capacity grounds.

4 RECOMMENDATION

- 4.1 It is recommended that the Committee notes the planning appeal decision with regard residential development and associated works at land at Stobs Farm, Lady Brae, Gorebridge.

Peter Arnsdorf
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Appeal Decision Notice

Decision by Christopher Warren, a Reporter appointed by the Scottish Ministers

- Planning appeal reference: PPA-290-2061
- Site address: Land at Stobs Farm, Lady Brae, Gorebridge, EH23 4HN
- Appeal by Hallam Land Management and CEG against the failure to give a decision by Midlothian Council
- Application for planning permission in principle 21/00252/PPP dated 01 April 2020
- The development proposed: residential development (indicative total of around 308 homes) and associated works
- Date of site visit by Reporter: 31 March 2022

Date of appeal decision: 1 September 2022

Decision

I dismiss the appeal and refuse planning permission in principle.

Preliminary matter

The council provided a screening opinion which concluded that an Environmental Impact Assessment (EIA) would not be required to accompany this planning application. Having regard to the criteria outlined in Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017, which relate to the characteristics of the development, its location and likely impacts, I agree with the council's conclusion that this proposal would not constitute EIA development.

Reasoning

1. I am required to determine this appeal in accordance with the development plan, unless material considerations indicate otherwise. The adopted development plan is principally comprised of the Edinburgh and South East Scotland Strategic Development Plan (the SDP, known as SESplan) adopted in June 2013; and the Midlothian Local Development Plan, adopted in November 2017 (the LDP). There is also associated supplementary guidance which accompanies the SDP and LDP.

2. Having regard to the provisions of the development plan the main issues in this appeal are (i) the principle of development, having regard to whether there is a sufficient effective housing land supply; (ii) landscape and visual effects; and (iii) how infrastructure requirements would be met.

Principle of development

3. The sufficiency or otherwise of the effective housing land supply is a potentially determinative matter in this appeal, because the location of the development would in normal circumstances be contrary to the development plan. It is outwith the settlement

boundary for Gorebridge, and in an area designated as countryside. LDP policy RD 1 ('Development in the countryside') outlines the limited circumstances in which development may be permitted in the countryside. The proposed development is incapable of aligning with any of the exceptions the policy provides to the otherwise general presumption against development in this location. The development would be directly contrary to policy RD 1 on this basis.

4. The appellant's case for why the development ought to be granted consent is both predicated and reliant on the assertion that in Midlothian, there is an insufficient effective housing land supply. This is in the context of the provisions of SESplan policy 6 ('Housing land flexibility'), which requires each constituent planning authority to maintain at least five years' effective housing land supply at all times. In turn, policy 7 ('Maintaining a five year housing land supply') permits the release of unallocated greenfield sites where necessary to maintain a five years' effective housing land supply, subject to more detailed criteria also being satisfied. LDP policy STRAT 2 similarly also relaxes the presumption against housing development outwith built-up areas where a housing land shortfall emerges.

5. Whilst SESplan pre-dates Scottish Planning Policy (SPP) 2014, in this regard it is consistent with SPP paragraph 123 which also requires planning authorities to maintain enough effective land for at least five years. Where a shortfall emerges, paragraph 125 of SPP makes clear that development plan policies for the supply of housing land will not be considered up-to-date. In accordance with SPP paragraph 33, this would engage the presumption in favour of development which contributes to sustainable development as a significant material consideration. The scale of any shortfall would also affect the weight, or in other words the 'the tilted balance' in favour of development, which would need to be outweighed by significant and demonstrable adverse impacts in order for the refusal of planning permission to be justified in the overall planning balance.

6. In city regions, the starting point for assessing the adequacy of the current effective housing land supply is the housing supply target and housing land requirement set by the strategic development plan. In this regard, the age of SESplan and the fact that it is overdue for replacement means that it does not provide a sufficiently forward-looking figure against which the adequacy of land supply can be assessed. The figures stated for Midlothian (which appear in the SESplan supplementary guidance 'Housing land' published in November 2014) only extend to 2024. It is therefore impossible to calculate how much effective housing land would be enough for at least five years.

7. This situation with the development plan prevents me from being able to assess the sufficiency of the housing land supply. Whilst the SPP presumption is engaged as a significant material consideration in this case by virtue of this aspect of the development plan being out-of-date, a finding of a shortfall in the effective housing land supply would require the tilted balance to be applied, as outlined above, in addition to SESplan policy 7. However, there is no way in which a definitive finding on the adequacy of the housing land supply can be reached when the figures stipulated by SESplan (and repeated in the LDP) do not apply beyond 31 March 2024. It would be inappropriate for me to attempt to reach a finding by applying my own assumptions or some other approach which deviated from the five-year requirement, because this would not be adequately grounded in policy or evidence.

8. Notwithstanding this finding, I consider there is still some merit in exploring what the available evidence indicates in regard to the housing land supply situation. The appellant and council have presented their respective positions on how this matter should be approached, and I also sought further written submissions to further explore the issue. In

the absence of any satisfactory alternative to an up-to-date housing land requirement, I am reliant on other evidence to establish whether, on balance, it would be reasonable for the appeal to be determined in accordance with the normal provisions of the development plan relating to housing, or whether a shortfall in housing land could more fairly be assumed at this time.

9. I do not consider that calculations based on housing figures in the rejected replacement SDP (SESplan2) or in draft National Planning Framework 4 (NPF4) provide any basis for reaching conclusions on the adequacy of the current effective housing land supply, given the respective statuses of these documents. The expected adoption of NPF4 later this year is an important material consideration in my view, the reasons for which I return to below, but I do not consider that weight can be given to housing figures for Midlothian set out in the draft version, particularly given these could be subject to (potentially significant) change.

10. The LDP states that the current housing land requirement for the overall plan period to 2024 is for 12,490 homes. The appellant has highlighted that the means by which this figure was set in the LDP (i.e. by not applying a generosity margin to the SESplan figure, which is also 12,490) was inconsistent with the approach taken in the Edinburgh LDP and West Lothian LDP examinations. However, the question of whether a generosity allowance should be added was a matter which was expressly considered during the examination of the Midlothian LDP. There would be no justification to now interpret the housing land requirement stated in the LDP as a housing supply target to which a generosity margin should be added. To do so would disregard what the LDP deliberately states.

11. Based on information contained in the housing land audits for 2018, 2019, and 2020 (and whilst being mindful of the limitations of accurate forward programming), this provides some indication of whether or not, at those points in time during the current plan period, there was likely to have been at least five years' effective housing land supply.

12. The council has applied the average methodology (which is simply based on the annualised requirement multiplied by five) whilst the appellant has made the case for why the residual methodology (which takes account of completions to date) ought to be favoured. Ultimately I can see advantages and disadvantages of both options. Government policy does not stipulate which methodology ought to be favoured, and neither option can be deemed to be definitively right or wrong.

13. The respective methodologies unsurprisingly give starkly contrasting results. In 2018, 2019 and 2020, the average methodology indicates that an effective land supply sufficient for in excess of six years could have been demonstrated at the time of each audit. Meanwhile using the residual methodology would indicate less than a five-year effective supply, with the shortfall growing year-on-year from 1,049 units in 2018 to 2,002 units in 2020.

14. Regardless of which methodology is used, as already explained it is impossible to make an up-to-date calculation of how much land would represent a five-year effective housing land supply when there is not a housing land requirement applicable to the next five years. Furthermore, even if it was accepted that a shortfall may have existed at other points in time during the current plan period, it does not necessarily follow that a shortfall would still exist today.

15. What is not in dispute between the appellant and council is the number of homes which have been built so far in the current plan period. In the 12 years between 2009

and 2021, a total of 6,809 homes have been completed in Midlothian. That leaves three years before the end of the plan period for a further 5,681 homes to be completed, if the housing land requirement of 12,490 homes to be built between 2009 and 2024 is to be achieved. The council has indicated that the draft 2022 housing land audit records that at least 802 units have been completed between April 2021 and March 2022. On that basis, this would leave two years for in the region of 4,879 homes to be built if the number of homes required to be built during the current plan period is to be met. I have seen nothing to suggest that this would be achievable, and given this would require the rate of annual completions to be at least three times higher than has been achieved so far in any other year during this plan period, in my view it is inconceivable that completions will be sufficient to align with the housing land requirement for the plan period.

16. Whilst housing completions are almost certainly going to fall some way short of the number required during the overall plan period, this does not in itself demonstrate that an insufficient effective housing land supply must have been the cause, or that a land supply shortfall must exist now. The council has referred to various external factors outwith its control which has suppressed completion rates. These include the 2008/9 recession and, very recently, the pandemic. I am in no doubt that such significant influences would be capable of adversely affecting housing completion rates. That said, as the appellant has highlighted, there would have been various options available to the council to respond to a reduced rate of completions and site-specific delays through its action programming, which may have limited the scale of the emerging shortfall across the overall plan period.

17. It is relevant to note that, across the plan period of 2009 – 2024, the 2017 LDP predicted a total housing land supply of 12,997 (i.e. 507 units more than the overall housing land requirement). There do not appear to have been any obvious deficiencies in the overall supply situation at the point at which the LDP was adopted, which could have signalled that a shortfall in the effective land supply could be anticipated to emerge during the plan period. That said, all supply assumptions have their limitations, and they can rapidly alter.

18. As I have already outlined, in the absence of a sufficiently forward-looking housing land requirement, it is impossible to make a finding on whether the council is currently maintaining at least a five-year effective housing land supply. Based on other relevant evidence and indicators, and in particular the fact that the number of homes likely to be completed by 2024 will fall some way short of the number that had been planned for in this period, there is some cause to assume that a more generous supply of effective housing land may have lessened this shortfall. Planned sites have either failed to become effective when envisaged, and/or the build-out rates have not kept pace with programming. In either scenario, the identification and release of additional sites may have to some extent enabled this increasing shortfall in actual completions to have been avoided.

19. In practice I am rather sceptical that supply is to blame for the under-delivery of new homes in Midlothian. Given the rate of delivery has been less than expected (and noting the various other influences which have affected build-out rates and/or the uptake of sites in this period) I have difficulty with the notion that a release of additional sites would have led to any notable increase in completion rates.

20. There is also still a distinction to make between the effective land supply and actual completion rates, and I recognise that the need to rely on other evidence and assumptions, rather than an up-to-date housing land requirement, is in itself a rather unsatisfactory situation for both the appellant and the council. The absence of a sufficiently up-to-date housing land requirement in my opinion represents a failure of the plan-led system. The

only meaningful proxy measure of the adequacy of 'supply' is now completion rates, and despite the limitations of this approach, I find this to be the best available evidence. On this basis, I shall for the purposes of this assessment assume that a shortfall in the effective housing land supply exists. Noting the scale of shortfall in completions relative to the housing land requirement, I take this to indicate that a moderate angle of tilt in favour of the development should be applied in this regard, to be taken forward into the overall planning balance.

21. Having reached this conclusion, a relevant material consideration is whether the delivery of housing on the site would help to address the assumed shortfall in an appropriate timeframe. Where new homes would not be completed until after 2024 (being the date against which a shortfall in actual completions can be anticipated), it follows that these would do nothing to address the shortfall by the end of the current plan period. In such circumstances it is fair to consider whether any housing completions on the site beyond 2024 should be afforded the same weight as those which would help to lessen the shortfall during the plan period.

22. Furthermore, it is a well-established principle that development plans, and plan periods, operate independently from one-another, the practical effect of which is that (under)-performance against a previous plan does not fall to be taken into account in development management decisions made under a current, up-to-date development plan. In other words, when a new development plan is published which sets a new housing land requirement (or equivalent) for Midlothian, this will effectively 'reset' the housing situation entirely, and there would be no need or expectation to have ongoing regard to shortfalls against targets in a superseded development plan. In reaching this conclusion, I note and draw support from the appellant's own view expressed in paragraph 1.42 of its further written submissions (which I appreciate was made in support of a different argument), where it asserts that "Any shortfall arising against those [2009-2024] housing figures will exist in perpetuity until such time as a new development plan is approved and adopted".

23. In paragraph 9 I have already alluded to the relevance of NPF4 in this case. It cannot be ignored that NPF4 is expected to be published during 2022. Even if this current timescale was to experience some delay, there is no reason to envisage its publication being pushed back to beyond 2023. Once published, NPF4 will be part of the development plan and will, with immediate effect, provide a minimum all-tenure housing land requirement for Midlothian. This means that by the earliest date that the proposed development could conceivably provide any housing completions (i.e. during 2023), the housing land requirement would have already been reset. In policy terms at least, any homes built on this site would be counted as contributing to meeting the new NPF4 requirement, rather than reducing the scale of a shortfall in completions relative to a requirement set in SESplan (that is out-of-date and which will have been formally superseded by NPF4).

24. Ultimately however, until NPF4 is published in its final form I consider the most pragmatic approach is to consider the proposal in the context of how the additional housing could help to address the housing supply situation as it presents itself today. Having found that a shortfall should in this case be assumed, there is nothing before me to indicate that the appeal site is not effective, and therefore it is capable of helping to remedy the assumed shortfall, albeit that the majority of completions would be beyond the current plan period. Whilst a future policy resolution to the shortfall can be anticipated as imminent, I do not consider this to currently outweigh the case for releasing additional land for housing.

25. In principle, the proposal aligns with and benefits from the support of SESplan policy 7, on the basis of my assumption that an effective housing land shortfall exists.

Compliance or otherwise with policy 7 overall is however subject to three criteria (a-c) as outlined in the policy. I consider these in turn below.

(a) Would the development be in keeping with the character of the settlement and local area?

26. A landscape and visual appraisal has been prepared in support of the proposal. I have had careful regard to the reasoning and findings of this document, related submissions and matters discussed in correspondence between the appellant and council, before reaching my own conclusions. I also referred to the appraisal during my site inspection.

27. The proposed development would represent a substantial urban extension to the southeast of Gorebridge. The site is relatively elevated, in parts steeply sloping, and the eastern boundary of the site broadly follows the ridgeline which is well defined in views from the west.

28. In plan form, the development would appear to extend southwards to a broadly comparable extent to other recent residential development on the south side of Gorebridge, located further to the west. However, given the elevation and topography of the appeal site, this development would in my opinion have notably more pronounced landscape and visual effects than those other recent schemes. The substantial tract of intervening agricultural land between the appeal site and recent development to the west means that, in practice, there would be very little, if any, sense of the developments visually relating to one-another. Instead it would result in the proposed development appearing as a relatively isolated, linear, even sprawling, incursion into a highly prominent area of countryside.

29. Considered as a whole, the site would poorly visually relate to Gorebridge, and other residential developments on the south side of the settlement do little to alter this perception. Those developments are at a significantly lower level. The residential development immediately to the north of the appeal site, on the opposite side of Lady Brae, is more comparable in that it occupies a relatively elevated position. However, the levels are still noticeably lower than the majority of the appeal site. It is also apparent that care has previously been taken to establish Lady Brae as a strong and defensible urban edge in this location, and in landscape and visual terms this has been successful in my opinion.

30. This is not to say that the entirety of the appeal site is necessarily devoid of development potential due to the nature of resultant landscape and visual effects. Furthermore, adverse effects need to be balanced against the importance of addressing the housing supply shortfall. However, I have particular concern over the landscape and visual effects which would occur from the development of the site to the south side of Stobs Farm (considered as 'compartments' B and C in the landscape and visual appraisal). Whilst I note the potential for landscaping and planting plans to some extent soften the development's appearance over time, in my view it would be unlikely to adequately mitigate the adverse effects of developing the site. The development would remain highly prominent due to its elevation and gradient across the site.

31. I find that the southernmost parts of the site in particular would have a disproportionately greater impact than the part of the site closer to Lady Brae ('compartment A'). Development of compartments B and C would starkly encroach into an area with an otherwise obviously more rural character, which contributes both to the setting of Gorebridge as well as forming a rural backdrop in other views, in areas more firmly within a countryside context, to the east and south. The photomontages for viewpoints 1, 2, 5

and 6 provided in the landscape and visual appraisal together illustrate examples of the effects of the development at both shorter and longer range, and show how the visual influence of the development extends considerably further than other parts of Gorebridge. They also illustrate a rather disjointed relationship with the current, well defined urban edge and pattern of more recent development.

32. All told, I find the proposal would represent an undesirable and excessive incursion of development in a highly prominent part of the landscape, giving rise to significant adverse landscape and visual effects to the detriment both of the character of Gorebridge and its setting, and by virtue of the development's influence upon wider areas of countryside. On this basis, the development would fail to accord with criterion (a) of SESplan policy 7, and it would also be contrary to LDP policy ENV 7 ('Landscape character').

(b) Would the development undermine green belt objectives?

33. The appeal site is not within the green belt and therefore it would have no bearing upon the objectives of green belt designations. Accordingly, the proposal would comply with criterion (b) of SESplan policy 7.

(c) Is any additional infrastructure required as a result of the development either committed or to be funded by the developer?

34. It is reasonable to expect that any development of this scale and type would require additional infrastructure in order to be satisfactorily accommodated. In this case and based on the responses of relevant consultees, I am satisfied that the vast majority of infrastructure matters (such as road improvements, public transport links and utilities) are capable of being satisfactorily addressed through the use of appropriate conditions and/or a legal agreement.

35. The only matter relating to infrastructure over which there is ongoing dispute between the appellant and council is in regard to the capacity of local schools to accommodate additional pupils from the development. I sought further written submissions on this matter, and it is clear from the respective positions of the council and appellant that disagreement over the scale and duration of any potential capacity issues stem from the assumptions used in the respective assessments.

36. Regardless of the precise scale of any predicted capacity issues, there is a need to identify the potential solutions in order to overcome the constraint in education capacity. In this regard, the appellant has outlined various measures which it considers could be employed in order to ensure that sufficient school capacity would be maintained, and it has confirmed that it would be agreeable to making a proportionate financial contribution towards these. The council has not agreed that these measures would be deliverable or appropriate, but critically it has not put any alternative solutions forward. In effect therefore, education capacity constraints are in this instance being presented by the council as an insurmountable constraint to any further housing development in Gorebridge

37. In my view, the council's position is at odds with the thrust of SESplan policy 7 and its intention to enable the release of additional housing land if needed. Criterion (c) of the policy recognises that infrastructure requirements may exist, and it places the onus on the developer to meet the costs of a solution where one is not already committed. The policy does not envisage a situation that infrastructure capacity would act as an absolute

constraint to development even in the face of a developer's agreement to meeting proportionate costs to resolve the matter.

38. In this context, I do not consider it to be satisfactory for the council to indicate that there is an education capacity problem but fail to present solutions to it (whether temporary or permanent). In the absence of any agreement over what ultimately may be the most appropriate means of resolving the capacity constraints identified, I simply note that the appellant has confirmed its agreement to meeting proportionate costs for necessary measures. In doing so, and subject to this being secured as necessary, the requirement of policy 7(c) would be satisfied.

Overall planning balance

39. The principle of development - and therefore the outcome of this appeal - ultimately rests on whether the additional housing being proposed, or the resultant landscape and visual effects, ought to be afforded the greater weight in the overall planning balance. There are a range of other relevant matters (including economic impact; accessibility; ecology; and use of prime agricultural land for development) but there are none which I consider to be individually capable of being pivotal to the question of the acceptability of the principle of residential development at this location.

40. The proposed development would be contrary to SESplan policy 7, on the basis that the development would be in conflict with criterion (a). However, that in itself does not mean that planning permission should be refused, particularly given the development plan is out of date and as an effective housing land shortfall is assumed. It is entirely possible that the importance of increasing the housing land supply, and ultimately delivery of new homes, could still outweigh the adverse impacts of development, when a tilted balance is applied in recognition of the assumed housing situation.

41. In considering whether this development would contribute to sustainable development, I have also had regard to the terms of SPP and the six qualities of successful place outlined therein. I find the proposal would fail to align with the attributes of a 'distinctive' development by virtue of part of the site's particularly poor relationship to the existing settlement form, landscape setting and topography. The landscape and visual effects would be disproportionately harmful for a development of this scale, for the reasons outlined in my foregoing assessment.

42. I have previously noted that the timing of the development is a material consideration, in the context that NPF4 is expected to be published this year. However, even if this matter is set aside entirely and I assume that there is both an ongoing effective housing land shortfall and no prospect of an imminent policy resolution to it, I still reach the same conclusion that the development proposed would not represent a sustainable form of development overall on the basis of its landscape and visual impact.

43. Once NPF4 is published, it would be for the council to establish whether additional sites would need to be allocated in this area and, if so, whether any parts of the appeal site would be an appropriate option to take forward into a future iteration of the LDP. That process would inevitably take account of the locations of any other further allocations in and around Gorebridge and their physical relationship to one-another. This appeal decision relating to the full site area as proposed, and in the context of the current pattern of development, would not fetter the council's ability to reconsider the site, or parts of it, for housing at a future point in time and in the wider context of plan-making.

44. As it stands however, for the reasons set out above, the proposed development does not accord overall with the relevant provisions of the development plan. Having applied the presumption in favour of development which contributes to sustainable development as a significant material consideration in this case, and having also applied a moderate tilted balance in recognition of the assumed housing shortfall, I still conclude that there are no material considerations which would be sufficient to justify granting planning permission in the face of the significant adverse effects I have identified. I have considered all the other matters raised, but there are none which would lead me to alter my conclusions.

Christopher Warren
Reporter