



## **Appeal Statement**

### **Land at Trumans Farm, Manor Lane, Gotherington**

Outline application with all matters reserved except for access for the development of up to 65 dwellings (inc. 40% affordable homes) including access, and other associated works.

Planning Inspectorate reference: 3167141

Tewkesbury Borough Council reference: 16/00539/OUT

#### **Introduction**

This statement has been prepared by CPRE to follow up its letter of objection to the proposed development dated 14 July 2016, submitted at the planning application stage. This related to the original proposal for 75 dwellings. CPRE did not comment on the revisions to the application providing for 65 dwellings, now the subject of this appeal, since in our opinion the reduction in the number of dwellings made no significant difference to the extent of adverse impact.

The statement has taken account of the NPPF, NPPG, the Tewkesbury Borough Local Plan and the draft Joint Core Strategy (JCS). The documents which accompanied the planning application were addressed in the letter of 14 July.

The fact that the application 16/00539/OUT was refused against officer recommendation is acknowledged.

#### **The Site and its Surroundings**

The letter of objection refers to the site and surroundings, and to the tour by representatives of CPRE of all the viewpoints in the applicant's Landscape and Visual Assessment, prior to the drafting and submission of that objection. Our further observations in relation to the relevant emerging JCS policies are set out below under the heading Landscape and Visual Impact.

#### **The Development Plan**

The development plan consists solely of the Tewkesbury Local Plan adopted in 2006.

The emerging development plan consists of the Joint Core Strategy (JCS) being prepared by Gloucester City, Tewkesbury Borough and Cheltenham Borough Councils. The progress of

the JCS is addressed below. The Tewkesbury Borough Plan which will flow from it is still at an early stage and has yet to take account of public consultation.

### **The Gotherington Neighbourhood Development Plan**

A hearing into the Gotherington Neighbourhood Development Plan (GNDP) was held on 23 March 2017. The Examiner's report does not bear a date, but appears to have been issued on 6 April. The content of the report naturally reflects the scope of the hearing, which was confined to the current status of the three sites proposed in the GNDP for housing and the question of where the settlement boundary should be drawn.

At the hearing, the existence of the Trumans Farm proposal and another at Cobblers Close for 50 dwellings (TBC reference 16/00901/OUT) was acknowledged. A representative of the applicants at Cobblers Close was a participant at the hearing; he announced the applicant's intention to lodge an appeal, following the refusal of this application by the Council on 14 February.

The responses to the Regulation 16 stage of consultation on the GNDP included that of Barton Willmore on behalf of the applicants for 16/00901/OUT. Appendix 2 consists of Counsel's opinion, which expresses the view at paragraph 36 that *"the GNP needs to await the outcome of, certainly the JCS process, and in my opinion also the TBP [i.e. Tewkesbury Borough Plan] process"*.

However, the fact that the JCS (and TBP) process has not been completed has not prevented other NDPs in the Borough from progressing further than the Regulation 16 stage. Indeed, two have been made: Winchcombe and Sudeley, and Highnam, which were brought into legal force by the Borough Council on 24 January 2017. Winchcombe is defined in the Joint Core Strategy as a rural service centre, while Highnam is one of the service villages; in other words, they are both important settlements in a defined hierarchy. In the case of Gotherington, the Examiner concluded thus in respect of housing provision at paragraph 3.2: *"Numbers of new homes needed in Gotherington cannot be exactly stated at this point in time, but it is not the role of a neighbourhood plan to determine the objectively assessed need for housing, and there is no requirement that it should wait on definitive answers from higher level policy documents to emerge"* [CPRE emphasis].

CPRE considers that the following other points from the Examiner's report are important. Paragraph 4.4.3 refers to site GNDP2/3, at the eastern end of the village, which has planning permission under 16/00336/OUT for 10 dwellings. This had been identified in an earlier version of the GNDP with a potential capacity of 24 dwellings. The key point is in the final clause of this paragraph, which states *"... I do not accept that the lower figure of 10 dwellings has been finally substantiated"*. In other words, there exists a degree of flexibility in the capacity for the provision of housing in the village.

The end of paragraph 4.4.5 states *“The designated Area of Special Landscape Value in the adopted TBLP2011 has informed choice of sites quite legitimately...”*. Section 4.12 refers to Policy GNDP10: Protecting Locally Significant Views. The implications of this policy as proposed by the Examiner to be modified are discussed below under the heading Landscape and Visual Impact.

The summary of the Examiner’s report states that subject to modifications the GNDP meets the basic conditions and may proceed to referendum. The GNDP has therefore taken a major further step towards becoming part of the development plan, and CPRE considers that considerable weight can now be attached to it. In our opinion this militates even more strongly against the development proposed at Trumans Farm.

### **Recent Changes in Context**

Changes to the strategic and local planning context since CPRE submitted its objection to the planning application in July 2016 are summarised below.

At the strategic level, the JCS has reached the Main Modifications stage. Paragraph 156 of the JCS Inspector’s Interim Report of May 2016 begins: *“Having considered the Tewkesbury omission sites, there appears to be only one site within the JCS area that is appropriate for strategic allocation and that is Land at Fiddington”*. It is also far from clear how soon land at Mitton, close to Tewkesbury town but located in Wychavon District, might come forward.

It is also worth emphasising again paragraph 154 of the Interim Report, which states in full: *“The JCS team indicated at the March hearing session that additional capacity could be considered in the Tewkesbury Local Plan and distributed across the borough. However, scattering such a large amount of housing around the Tewkesbury villages would not be the most sustainable approach. More appropriate would be the allocation of strategic sites close to Tewkesbury Town, which is identified as the second most important tiered location in the settlement hierarchy, after Gloucester and Cheltenham”* [CPRE emphasis].

The Interim Report had recommended reinstatement of a draft allocation at Twigworth for just over 1,350 dwellings as a means of helping to match a significant increase in the total housing requirement for the JCS area. Tewkesbury BC resolved not to accept this recommendation, but having considered potential alternatives then decided (on 31 January 2017) to accept the allocation albeit on a reduced area with a commensurate reduction in the number of dwellings (995).

It was announced last autumn that most of the MoD depot at Ashchurch, allocated in the JCS for mixed use development based on 2,725 dwellings, will not be available in the Plan period. This has however not led either to the identification of alternative strategic sites or to the idea that significantly greater provision for housing should be made in the Borough’s villages.

At the local level, planning permission was granted on 25 October 2016 for 50 dwellings on a site on Malleson Road, Gotherington (16/00965/OUT). As acknowledged in the Examiner's report on the GNDP, this site is one of those identified as a potential location for housing. The effect of this decision is to bring to at least 77 the number of dwellings permitted in the village in the last two or three years, taking account also of the 10 dwellings off Gretton Road (16/00336/OUT) and the 17 dwellings nearing completion off Shutter Lane.

The consultation period on the Main Modifications to the JCS closed on 10 April. It is very likely that further hearing sessions will take place, and if so, in the summer. The outcome cannot be anticipated. In the meantime, pending the outcome of decisions on strategic matters, CPRE wishes to emphasise very strongly that development of the kind now proposed at Trumans Farm should not be regarded as part of a solution to the difficulties of making sufficient provision for housing in the JCS area.

### **Response of the Cotswolds Conservation Board**

The response to the application from the Cotswolds Conservation Board (CCB) was posted on the Borough Council's website on 12 July, too late to be taken account of in our own objection dated 14 July. Nevertheless, CPRE endorses the CCB's succinct objection and hope that the Inspector will take due account of it in reaching a decision on this appeal.

### **The Reasons for Refusal**

CPRE has examined the reasons for refusal. We note that numbers 2 to 6 all begin "*in the absence of an appropriate planning obligation...*". The first reason however deals with matters of principle and refers specifically to adopted Policy LND2 and two policies, SD7 and SD8, from the draft JCS.

### **Statement of Common Ground**

We understand that a Statement of Coming Ground is being drafted, but will not be available until after the deadline for comments by interested parties.

### **Recent Appeal Decisions**

CPRE has been actively involved in many recent appeals in Tewkesbury Borough, whether decided by written representations, informal hearing or public inquiry. We acknowledge of course that appeals, like planning applications, are decided on the merits of the individual case. However, we believe that some lessons can be drawn from these recent cases.

Appeals were allowed at Twynning (58 dwellings; PINS reference 3001706) and at Alderton (47 dwellings; 24 dwellings; PINS references 2209001 and 3001584). The site at Twynning was not the subject of any landscape designation; the two sites at Alderton were located in the Special Landscape Area forming the foreground to the AONB and Alderton Hill, one of three outliers of Jurassic limestone in the area.

Two appeals were dismissed at Alderton (59 dwellings, 53 dwellings; PINS references 2222147 and 3003278). Again, both sites were located in the Special Landscape Area. Landscape was held not to be a major issue in the latter; but was considered important in the former, where the extension of the village into the open countryside (and the impact on the setting of the medieval parish church) were found to weigh against the proposed development.

A proposal for 35 dwellings at Gotherington was dismissed in September 2015 (PINS reference 3002522). Here, the site was located in the Special Landscape Area again forming the foreground to the AONB, this time at Oxenton Hill, the second of three outliers of Jurassic limestone in the area.

The two strands CPRE draws from these cases are as follows:

- Five year land supply has (inevitably) been an issue at all of them; but has by no means been an overriding factor.
- Landscape has been a determining issue in some cases even where the site was not located in the AONB.

CPRE has also examined the three appeal decisions appended to the appellant's Statement of Case.

*Ashleworth (PINS reference 3150236)*

This appeal, for 35 dwellings, was allowed. However, the opening paragraph (38) of the section headed The Planning Balance refers to the absence of a five year supply in a way which has a significant bearing on other considerations. Now that the Borough Council can demonstrate a five year supply of land for housing, the case is altered.

*Church Row Gretton (PINS reference 3142559)*

This case involved a full application for 23 dwellings. It has one factor in common with the present case: the site is in the Special Landscape Area. However, the discussion on landscape matters in paragraphs 25 to 45 of the decision letter indicates that the site is in a less sensitive part of the SLA than Trumans Farm, and does not adjoin the AONB. As in the Ashleworth case, the decision was issued before the Borough Council could demonstrate a five year supply of land for housing.

*Down Ampney (PINS reference 3131716)*

Even before the specific aspects of this case are addressed, CPRE has doubts about its relevance. Although the site is in Gloucestershire, there has been no common strategic policy framework in the County since the demise of the Structure Plan.

The case, involving a proposal for 44 dwellings, differs from the present one in important respects. Planning permission already existed for 22 dwellings on part of the site. There is no Neighbourhood Development Plan. The site is not in or near any area designated for its landscape quality. Paragraph 28 begins *“Environmentally the site is not argued to be of merit”*. Finally, paragraph 9 ends thus: *“These figures (for commitments and potential capacity) must be treated with caution, but they do establish that the Council currently has no current ‘in principle’ objection to at least 54 dwellings being built in Down Ampney over the period of the emerging Local Plan to 2031”* [CPRE explanatory note in parentheses].

CPRE concludes from an examination of these cases that little if any support for the present case can be derived from them.

### **Environmental Impact Assessment**

We note the content of the letter from the Planning Inspectorate to the Borough Council dated 10 April 2017, which states that *“the proposal would not be likely to have significant effect on the environment by virtue of factors such as its nature, size or location”*, then giving reasons. CPRE wishes to emphasise that this opinion is independent of the question of whether or not the proposed development is acceptable in planning terms.

### **The Main Issues**

Having set the context for the appeal, CPRE considers the main issues to be:

- The extent to which the proposed development complies with national guidance
- The extent to which the proposed development complies with local policy
- The degree of landscape and visual impact
- The implications of the housing land supply position in the Borough, and policies for housing provision in the service villages
- The potential impact on social cohesion
- Whether or not the proposed development constitutes sustainable development

These are dealt with in turn below.

### **Compliance with National Guidance**

This section identifies and addresses what CPRE considers to be the applicable parts of the NPPF and NPPG, with the exception of paragraphs 47 and 49 of the former, dealt with under housing land supply, and paragraph 14, addressed under the planning balance.

The proposed development is in our opinion inimical to the spirit of localism, and contrary to the content of the NPPF Foreword. Turning to the first two principles of paragraph 17,

the first states that planning should *“be genuinely plan led, empowering local people to shape their surroundings...”* and the second that it should *“not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives”*. The proposed development is contrary to both principles.

We consider that the proposed development is inconsistent with paragraph 109 of the NPPF which begins *“The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes...”*

### **Compliance with Local Policy**

CPRE acknowledges (and regrets) the fact that there is still no up to date policy framework for the Borough at strategic or local level which provides appropriate guidance on the amount and distribution of housing.

However, some policies (as opposed to proposals) do in our opinion continue to carry weight, partly because they have their origin in parts of national policy which were reaffirmed or carried forward in the NPPF. These relate in particular to the AONB, national guidance on which has been discussed above. We conclude therefore that the proposed development does not comply with adopted Local Plan Policy LND2, which in our opinion continues to carry significant weight in accordance with paragraph 215 of the NPPF.

### **Landscape and Visual Impact**

Our letter of objection to the planning application made no reference to JCS policies on landscape, mainly because it was considered that they had not yet acquired sufficient weight. We address them now, as the JCS has made some progress in the meantime; Policy SD8 is the subject of a minor but important modification.

Policy SD7 is unaltered in the Proposed Modifications. The proposed development does not in CPRE’s opinion comply with any part of it. In respect of part 1, it will not protect landscape character *“for its own intrinsic beauty and for its benefit to economic, environmental and social well-being”*.

In respect of part 2, the proposed development will emphatically not *“protect or enhance landscape character”* or *“avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area”* as the policy requires.

In respect of part 3, the application was accompanied by a landscape and visual assessment as required, but the mitigation and enhancement measures proposed are in CPRE’s opinion wholly inadequate.

The Proposed Modification (PMM056) to Policy SD8 deletes the words *“adjacent to”* in respect of the Cotswolds AONB and replaces them with *“within the setting of”*. We interpret

this broadening of the scope of the policy as also meaning that those areas which do adjoin the AONB boundary, as in this case, should be even more strongly protected.

The other policy potentially relevant to landscape is GNDP10: Protecting Locally Significant Views. Appendix 3 of the GNDP makes it clear that the principal concern is the potential visual impact of development on the eight sites assessed as candidates for housing development in an earlier version of the GNDP. Trumans Farm is not among these eight sites. Figure A1 illustrates the location and direction of twenty viewpoints. Three of them are from within the Trumans Farm site itself, looking north towards site GNDP2/3 (incorrectly labelled as GNDP 1/3 on Figure A1), now with planning permission for 10 dwellings under 16/00336/OUT. Thus, there is little if any overlap between these viewpoints and those used in the appellant's LVIA. Nevertheless, views from Nottingham Hill are referred to in one of eight bullet points in Policy GNDP10 itself. These include the very important viewpoints 13 and 14 used in the LVIA. We conclude that the proposed development is contrary to Policy GNDP10.

In respect of the reduction in the number of dwellings and the Illustrative Master Plan showing the disposition of the 65 dwellings now proposed, we note the reduction in the amount of built development on the more elevated parts of the site closer to the Gloucestershire Warwickshire Railway line. Nevertheless, we consider that since the entire parcel of land is being taken out of agricultural use, and since there is no buffer of any kind between the site and the railway, the urbanising effect of the proposed development would still be very marked, and the landscape and visual impact still unacceptably adverse.

We consider that there would be a specific adverse impact on the users of the Gloucestershire Warwickshire Railway, a heritage railway which is one of the most important visitor attractions in the area. It carried in the order of 100,000 passengers in 2016. It currently runs from Cheltenham racecourse in the south to Laverton, and is planned to extend to Broadway next year. When extended the line will be about 24 km long. It passes through Bishop's Cleeve/Woodmancote, with a built up "frontage" of about 1.5 km. Otherwise, the view from the railway is almost entirely rural in aspect. The proposed development would in CPRE's opinion have a disproportionately adverse effect on the traveller's experience.

Since the appeal is being dealt with by means of written representations, CPRE wishes to take this opportunity to respectfully ask the Inspector to visit all the viewpoints in the LVIA and to give particular attention to those we have identified as the most important, namely numbers 13 and 14, and number 5, including substantial stretches to the east and west of it.

### **Housing Land Supply and Housing Provision in the Service Villages**

A report to Council on 31 January states that the Borough can now demonstrate a five year supply of land for housing. This represents a significant change; for many years, going back



to at least to the Homelands Farm/Cleevelands appeal decisions of July 2012, and probably before that, a five year supply could not be shown.

CPRE has examined the calculations now set out in Tewkesbury Borough Five Year Housing Land Supply Statement (March 2017). Some explanation which the report itself does not provide is in order. Paragraph 1.1 states that the report “*sets out the position on the five year housing supply for Tewkesbury Borough as of 1st March 2017*”. This is misleading, as it does not cover the whole Borough.

Taking the “demand” side of the equation first, the housing requirement figure of 9,899 dwellings (paragraph 3.1) is much less than the total number of dwellings which will be need to be built within the administrative area of Tewkesbury Borough in the JCS period. In short, this requirement figure excludes consideration of the strategic allocations in Tewkesbury Borough which are designed to meet needs arising from Gloucester and Cheltenham. Likewise, the supply side excludes these strategic allocations, although it is clear from the tables in the report that other major sites (eg at Longford and Brockworth) located close to the JCS strategic allocations do in fact form part of the supply. The basis for this approach is contained in paragraphs 52 to 54 of the JCS Inspector’s Interim Report of May 2016. It is clear that Gotherington lies in the part of the Borough the report does cover. If it is accepted that the approach taken by the JCS authorities and by Tewkesbury Borough is justified, then the calculations set out in Figure 1 are mathematically sound. In particular, we consider that the figure of 5.97 years supply is appropriate, on the basis that all planning authorities have to provide a 5% buffer in accordance with paragraph 47 of the NPPF, and that Table 1 in the document shows that completions have matched requirements in the first five years (2011-2016) of the JCS period. It should also be noted that the deletion, referred to above, of the MoD site at Ashchurch from the JCS (because it is not now available) does not affect the five year land supply, as this site was not expected to deliver housing until towards the end of the plan period.

Turning to the more specific matter of housing provision in the service villages, the strategic context is summarised by paragraph 3.2.13 of the draft JCS incorporating track changes: *“About 2,740 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans”* [underlining deleted, except for CPRE emphasis].

This figure represents a small increase over that of 2,631 dwellings referred to in paragraph 3.2.20 of the submission draft JCS. Part 5 of Policy SP2 as modified indicates more precisely the balance between the two tiers of settlement: 1,860 dwellings in the rural service centres, 880 in the service villages. The Main Modifications thus increase total housing provision in the service villages from the 752 dwellings in the Submission version; 880

dwellings represent an increase of 17%. CPRE's interpretation of the increase is that it is an acknowledgement of the granting of planning permissions in these villages, rather than any in-principle approach involving accommodating a greater proportion of the total housing requirement in them.

The JCS itself provides no guidance on the numbers to be assigned to each village, nor any principles for distribution. However, the Borough Council published a Background Paper for the Tewkesbury Borough Plan, The Approach to Rural Sites, in February 2015. It mainly discusses the principles by which housing should be distributed among the service villages. Appendix D provides a summary in tabular form, including indicative figures for housing provision in each of the service villages which sum to the total of 752 dwellings referred to above. The figure for Gotherington is 71 dwellings. It is understood that it was this figure which formed the starting point for the GNDP, which took into account the 22 dwellings then committed, and made provision for the balance (that is, 49 dwellings). The current position has already been addressed above, and bearing in mind also the Examiner's comments, it is considered that Gotherington has made a sufficient contribution to meeting housing requirements in the Borough.

Table 1 appended to this statement sets out the level of completions and commitments in these villages. The list of villages excludes Twigworth, which is proposed for deletion in the Main Modifications to the JCS. Stoke Orchard has been added. It is significant that by far the greatest number of dwellings completed or with permission (224) in any one settlement is in fact Stoke Orchard. One implication of this is that if the total of 880 dwellings is to be broadly adhered to, then total provision for the service villages other than Stoke Orchard has actually fallen.

The table shows that completions and commitments in the service villages are more unevenly distributed than the indicative figures in Appendix D of the Background Paper. This in our opinion makes no material difference to the conclusion that sufficient provision for housing has already been made in Gotherington.

The overall position is that at least three quarters (rather than the two thirds referred to in paragraph 3.2.13 of the JCS) of the total housing provision envisaged for the service villages in that plan has either been completed or committed at a point six years into the twenty year plan period - less than a third of the way through. There is therefore no justification for the development on the grounds that it is needed to help meet policy requirements.

The figures are for parishes rather than settlements, and indeed the Background Paper draws attention to this distinction. However, we consider that for practical purposes this makes little difference, as policies have long restricted the development of housing in the outlying parts of parishes. The one service village whose name is not the same as that of the civil parish is Coombe Hill, which forms part of Leigh parish; as will be clear from the table,

there are few completions and commitments there, and again this makes little practical difference to the analysis.

The table also notes the existence or otherwise of a neighbourhood development plan for the parish concerned.

### **Social Cohesion**

The NPPF makes reference to “community cohesion” at paragraphs 58 and 69, in almost identical ways in the quite specific context of “safe and accessible environments” and crime and disorder. However, it makes no reference to the concept of social cohesion, which we assume to be broader. Social cohesion has nevertheless featured in some appeal decisions, most notably (in the local area) in the case of St Margarets Drive Alderton (PINS reference 2222147).

CPRE consider that there is one specific and measurable aspect of social cohesion which is particularly important in this context. A significant criterion of social cohesion (and sustainability) is the scope for children of primary age to attend school in their own community. It would be wholly unreasonable for safety and other reasons for children of primary age to be forced to travel any great distance to school on their own. Travel by car is often the only alternative; but this should be minimised for reasons of sustainability. Secondly, if most children in a settlement can go to school in their own community, this will (other things being equal) have benefits for social cohesion by promoting contact not only between the children themselves but also between their parents; this will in addition encourage participation by parents in the local community. To this extent, social cohesion can be related to the NPPF – specifically the first, rather than the second, bullet point of paragraph 69, which refers to *“opportunities for meetings between members of the community...”*.

Gotherington Primary School covers the age range 4 to 11. It is a 1 form entry school with a capacity of 210 pupils and currently has 212 pupils on roll. The school is therefore operating at capacity. At the most recent Ofsted inspection, it was rated “outstanding” in all respects. It is therefore more likely to be the first choice for parents in the locality.

At the ratios used by Gloucestershire County Council for education planning, the existing commitments for 77 dwellings would yield 21 pupils of primary age. The proposed development would yield a further 17 pupils. GCC Education (e-mail from S106 officer to TBC dated 28 October 2016) forecasts a slight decline in the numbers on roll by 2018/19, but also acknowledges the existence of other committed development in the area. On balance, it would therefore add to the difficulties of ensuring that places would be available for all children of primary school age in the village.

It is therefore concluded that the proposed development is likely to have an adverse effect on social cohesion in this particular respect.

## **Sustainable Development and The Planning Balance**

We address the planning balance in terms of the three dimensions of sustainable development.

In the economic domain, the proposed development would have benefits in terms of employment in the construction stage and increased consumer spending and Council tax revenues once the development is complete and occupied. The importance of these benefits must however be qualified by the fact that similar economic benefits would derive from the construction of 65 dwellings in a more appropriate location in the Borough, and that in any case local firms in relevant trades will not necessarily benefit. In terms of increased expenditure, most would be outside the village as a result of the limited facilities it offers.

In the social domain, there would also be benefits from the provision of 65 dwellings, a significant proportion of them affordable. However, this must be balanced against the fact that (in CPRE's opinion at least) the emerging NDP makes sufficient provision for housing on a scale commensurate with emerging strategic policy. The scheme for 50 dwellings (16/00965/OUT) on Malleson Road, now with planning permission, proposes 20 affordable units (40%) which should be sufficient to meet local needs in the foreseeable future. The provision of affordable housing on the appeal site is not therefore a benefit. In addition, the proposed development could well give rise to adverse effects on social cohesion as a result of children of primary school age not being able to attend the local primary school owing to its lack of capacity.

In the environmental domain, there would in CPRE's view be significant adverse effects, in the shape significant and irrevocable harm of to the landscape and in particular the setting terms of the impact on a nationally protected landscape, the AONB, adjacent to the site.

On balance, we consider that the proposed development does not constitute sustainable development

## **Summary and Conclusions**

CPRE finds the following:

- That the proposed development is inconsistent with the spirit and purpose of paragraph 17 of the NPPF and contrary to its provisions at paragraph 109
- That local planning policy for the provision of housing can be described as out of date, as the adopted Local Plan ran only to 2011.
- However, other Local Plan policy, in the shape of Policy LND2, can be afforded significant weight in terms of paragraph 215 of the NPPF because of its consistency with national policy

- That the proposed development is contrary to the Gotherington Neighbourhood Development Plan which has been found to meet the basic conditions and can proceed to referendum
- That the proposed development would make a very minor contribution to alleviating the difficulties of providing appropriate levels of housing in the Borough as a whole
- Finally, that the adverse impacts of the proposed development demonstrably outweigh the benefits.

The balance of planning considerations in CPRE's opinion therefore weighs against the proposed development. For this reason, the Inspector is respectfully requested to dismiss the appeal.

*David Crofts MRTPI, Director, Estcourt Planning, 13 April 2017*