

Planning Design & Access Statement

**Steeles Wood Stable, Wrotham
Road, South Street, Meopham, Kent,
DA13 0QJ**

**Conversion of existing barn to three
residential units, together with
provision of associated parking and
private amenity space and removal of
rear canopy to barn and existing WC,
office and stables**

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By GRAHAM SIMPKIN PLANNING

For: Kariba Ltd

Project reference: PR4074



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1 Introduction

- 1.1 This Planning Design & Access Statement has been submitted in support of a planning application for the following development at Steeles Wood Stable, Wrotham Road, South Street, Meopham, Kent, DA13 0QJ (hereafter referred to as 'the Site'):

Conversion of existing barn to three residential units, together with provision of associated parking and private amenity space and removal of rear canopy to barn and existing WC, office and stables

- 1.2 The following Land Registry titles are affected by the proposed development, all of which are understood to be under the ownership of the applicant:

Land Registry Title	Description
K690391	Land on the east side of Wrotham Road, Meopham, Gravesend

- 1.3 The application is accompanied by the following plans and documents:

- 4074.01 Site Location Plan
- 4074.02 Existing Block Plan
- 4074.03 Existing Floor Plan
- 4074.04 Existing Elevations
- 4074.05 Proposed Block Plan
- 4075.06 Proposed Ground Floor Plan
- 4074.07 Proposed First Floor Plan
- 4074.08 Proposed Elevations
- Structural Survey (TSC)
- Planning, Design and Access Statement (GSP)
- Preliminary Ecological Appraisal (KB Ecology)

2 Site Context

- 2.1 This Site is an existing equestrian facility with associated storage and is situated on the east side of South Street in Meopham, with the parcel of land sitting directly on the roadside. The Site is understood to be in active use and horses that are kept at the site belong to both the owners of the Site and other horse owners who use the facilities under a livery agreement.
- 2.2 Buildings that are associated with the site include a large barn (subject of the application) that accommodates 19 stables, a further small barn that accommodates 6 stables, a horse walker, 4 shipping containers, grass driving track, a tearoom, and a WC. This space accommodates 23 horses.
- 2.3 In terms of size, the Site's existing compound is approximately 0.35ha in area, being roughly 79.5m in depth and 32m in width. The land included within the proposed application site extends to approximately 0.27ha in area.
- 2.4 To the east of the Site is Steeles Wood, part of the larger Happy Valley Local Wildlife Site (LWS). Steeles Wood is classified as Semi-natural Ancient Woodland. The LWS runs along the upper reaches of the valley sides to the north and south of Steeles Wood.
- 2.5 The Site is accessed via a long lane leading north-eastwards from South Street across land which has a traditional parkland character. The yard is rough surfaced in type 1 crushed brick rubble. There is parking for cars and horse trailers in the yard.
- 2.6 The Grade II Listed C17 timber framed Leylands Farm Cottage is located approximately 165 metres from the yard on the western side of the A227 South Street, opposite the far NW corner of the land controlled by the applicant. This building is located to the west of South Street and is closely related to a group of buildings known as North Lodge, West Lodge Farm and Leylands. The road frontage to this group of buildings is made up of substantial hedgerows largely set behind close boarded fencing. Within the site itself, the yard sits behind mature trees. Although these probably once marked a field boundary, they now give the land an attractive parkland character.
- 2.7 This Site is the subject of the following planning constraints and characteristics:
- Metropolitan Green Belt.
 - Flood Zone 1 (low risk of flooding from rivers and the sea).

- Public Right of Way NS265 runs through the site, south of the main yard in from the A227 eastwards towards David Street.
- Leylands Farm Cottage – Grade II listed building nearby.
- Meopham Downs Local Landscape Character Area.
- Grade 3 agricultural land.

3 Relevant History

- 3.1 The Council's public access website confirms that the relevant planning history is as follows.

Use of land for trotting events for 6 days per calendar year

Ref. No. 19920290 | Status - Application refused on grounds that the access was

considered to be unsatisfactory and detrimental to highway safety, that the proposal would generate traffic and that it would be likely to result in excessive noise and disturbance.

Change of use from agricultural barn to B8 commercial storage

Ref. No. 20071088 | Status – Permitted

Application for approval of conditions 3 of planning permission reference number 20071088 relating to the screening of the barn from the main road.

Ref. No. 20080512 | Status – Permitted

****REVISED PLAN** Continued use of the agricultural barn as a livery stable, retention of the existing hay barn, shipping container and formation of an equestrian sand school**

Ref. No: 20150645 | Status: Application Permitted. This is a confusing description. The permission cannot be for an agricultural use if a livery stable is permitted, as this is recreational. The proposed plans confirm that the hay barn referred to is not the now existing rectangular extension to that exists on its northern side. This does not appear to have received planning permission. It is therefore assumed that the barn referred to is the smaller barn to the NE of the compound.

Change of use of the land for the stationing of 1 mobile home, 1 touring caravan and erection of a utility/dayroom for ancillary use; and formation of a hardstanding.

Ref. No: 20180219 | Status: Application Refused on grounds relating to Green Belt inappropriateness, harm to Meopham Downs Landscape Character Area, harmful light, noise, and odour from proposed package treatment plant to adjoining ancient woodland and located within an unsustainable location.

Erection of a barn for the storage of hay, straw and other bedding, and to include two secure spaces for use as a tack room and hard feed storage.

Ref. No: 20190609 | Status: Application Permitted

- 3.2 Some of the above records are indicated on the following annotated aerial photograph. As stated above, it appears that the structure shown to the NE of the aerial is the barn that is referred to in 20150645.



4 Proposed Development

- 4.1 The application proposes the conversion of the large barn in the north-west corner of the compound to residential use. The application site extends to approximately 0.27ha. The building would be converted into three 4 four-bedroomed residential units, including an element of first floor accommodation in each unit. The proposed units comply with the requirements of the Nationally Described Space Standards.
- 4.2 As part of the development the existing rear canopy on the barn would be removed and in addition the existing office and small stable block located adjacent to the eastern end of the barn would also be removed.
- 4.3 Private amenity space for each unit would be provided to the rear (north) of the building and parking spaces including EV charging points would be provided adjacent to the front (south) elevation of the building.
- 4.4 Externally, the existing profiled metal roof and upper walls would be replaced with 'Onduline' (or similar) roofing material and vertical timber cladding on the upper walls respectively. Additional fenestration would be inserted as required.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.
- 5.5 In terms of the Development Plan for Gravesham Borough Council (GBC), this comprises of the following documents that are relevant for this application:
- Core Strategy and Local Plan Policy Map (2014) (CS)
 - Gravesham Local Plan First Review Saved Policies (1994) (LP)

5.6 The CS sets out the general scope for the development within Gravesham and it reiterates the Government's priority to locate development on previously developed land. It identifies the focus of the new development within the main settlements in the district as set out in Policy CS02. At the other locations development will only take place where it is compatible with policies protecting the Metropolitan Green Belt and National Landscape (previously Areas of Outstanding Natural Beauty or AONBs). In this case, the site falls into only the Metropolitan Green Belt. The relevant policies are as follows:

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale and Distribution of Development
- Policy CS10 – Physical and Social Infrastructure
- Policy CS14 – Housing Type and Size
- Policy CS15 – Housing Density

5.7 The LP was originally adopted in 1994 and is now 30 years old. It does contain some saved policies that were not superseded by the CS. and carries some weight in the planning balance where they accord with the Framework. The following policies are relevant to this development:

- Policy C11 – Change of Use of Redundant Buildings in the Countryside
- Policy P3 – Parking Provision
- Policy P5 – Parking Standards for a Change of Use of a Building

Other Material Considerations

The Framework

5.8 The Framework makes clear that the purpose of the planning system is so contribute to the achievement of sustainable development. Paragraph 8 adds that the objective of such can be summarized as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development is described as having three overarching objectives:

- Economic (including identifying and coordinating the provision of infrastructure)
- Social (to support strong, vibrant, and healthy communities with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing) and:
- Environmental (to protect and enhance our natural and built environmental, including making effective use of land and helping to improve biodiversity)

- 5.9 Paragraph 11(d) of the Framework states that for decisions, where the policies which are the most important for determining the application are out-of-date, permission should be granted unless:
- 5.10 The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing development; or Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 5.11 Paragraph 60 of the Framework notes that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 5.12 Paragraph 70 of the revised Framework acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should (amongst others) support the development of windfall sites through decisions.
- 5.13 Paragraph 83 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 5.14 Paragraph 123 states that decisions should promote an effective use of land in meeting the need for homes and making as much use as possible of previously developed land. Paragraph 124 expands on this point, adding support in respect of the use of brownfield land within settlements for homes, whilst also promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. Paragraph 127 states that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. It is noted that the application of these paragraphs from the Framework, along with paragraphs 60 and 70, are not dependent on whether an authority has a five-year housing land supply (5YHLS).
- 5.15 Section 12 of The Framework is focused on achieving well-designed and beautiful places and its fundamentality to what the planning and development process should achieve.

5.16 Furthermore, paragraph 135 lays out the expectations of developments in terms of design which are as follows:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- Are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping.
- Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).
- Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming, and distinctive places to live, work and visit.
- Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- Create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁵²; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.17 Lastly, section 13 states the importance of protecting the Green Belt and the prevention of urban sprawl. Paragraph 143 sets out the 5 main purposes the Green Belt serves which is as follows:

- To check unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.18 Paragraph 152 of the NPPF advises that inappropriate development is by definition harmful to the Green Belt. This is further enforced by paragraph 153 which states very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness is clearly outweighed by other considerations.

5.19 Paragraph 154 advises that a local planning authority should regard the construction of new buildings in the Green Belt as inappropriate, but then sets out a list of exceptions. They are as follows;

- a) buildings for agriculture and forestry.
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.
- e) limited infilling in villages.
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites) and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings),
 - which would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt,
 - where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

5.20 Paragraph 155 confirms that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including the land within it. This includes the following;

- d) the re-use of buildings provided that the buildings are of permanent and substantial construction,
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds).

5.21 Paragraph 200 notes that when determining planning applications, LPAs should require any applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.

5.22 The following are also material considerations:

- National Design Guide (NDG) (October 2019);
- Residential Layout Guidelines SPG2 (February 1996, amended June 2020);
- Kent County Council Parking Standards SPG4 (2006);
- Gravesham Landscape Character Assessment (May 2009) (a technical document which underpins policy CS12).

6 Planning Assessment

Key Issues

- 6.1 The following are considered to be the key issues in the assessment of this application:
- Green Belt
 - Residential amenity
 - Ecology and Biodiversity
 - Highways

Green Belt

- 6.2 As noted above, paragraph 155 of the NPPF allows certain exceptions for proposed development not considered, in principle, to be inappropriate development. This is subject to two overarching caveats, firstly that the development preserves the openness of the Green Belt and secondly that there is no conflict with the five purposes of including land within the Green Belt.

Purposes of the Green Belt

- 6.3 As indicated earlier the five purposes of including land within Green Belt are as follows
- To check unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.5 The proposed development will
- Not result in unrestricted sprawl of large built-up areas and
 - Not result in neighbouring towns merging into each other.
 - Not result in further encroachment into the countryside. The site is already in a countryside location and not in an agricultural use.
 - Not result in harm to the character and setting of an historic town
 - Not have an impact on urban regeneration.

Openness and Landscape Impact

- 6.6 Any consideration of the impact of a development on the openness of the Green Belt requires two issues to be considered, the spatial impact and the visual impact of the proposed development. The requirement to assess impact on

openness in this way has largely resulted from consideration of the issue of openness by the Courts including the Supreme Court.

- 6.7 Spatial impact relates to the physical extent of development in terms of floorspace/volume. In this case the existing building which has a Gross External Floor Area (GEA) of 439.66m², is being converted and not extended. The existing canopy/covered storage area at the rear of the building which amounts to approximately 61.8m² is being removed along with the staff building (15.23m²) and stable block 27.92m² as well as a W.C (3.7m²) that is also currently attached to the back of the application building.
- 6.8 Some 108.65m² of built form will therefore be removed from the site. This represents a significant improvement in terms of any spatial impact.
- 6.9 Visual impact relates, in essence, to the impact of proposed development on the character and appearance of the Green Belt and the area surrounding the development.
- 6.10 There will be a visual improvement as a result of the removal of the buildings adjacent to the barn and canopy at its rear.
- 6.11 In addition, the paddock land to the north and west of the application building is currently divided into a series of individual grazing areas. The following images which include some taken from the PROW that crosses the site, illustrate the visual impact of the existing arrangements in terms of the openness of the site:





- 6.12 It is recognised that the enclosure of the amenity space at the rear of the barn may have some impact, but this will be limited given that the majority of the proposed fencing will be low, post-and-wire or post-and-rail fencing. There will be some privacy screening between plots close to the rear wall of the converted building but this will not impact views from the PROW. The immediate area around the converted building will also be 'tidied-up' in comparison to its current state.
- 6.13 The scale location and overall presence of the building in the context of the wider landscape surrounding it will not change as a result of the proposed conversion. Furthermore, as part of landscaping and Biodiversity Net Gain proposals, native species hedgerows will be planted along the western, northern and eastern boundaries of the combined amenity space serving the three dwellings which will also serve to mitigate any visual impact.

- 6.14 It is considered that with the proposed additional landscaping and improvement to the appearance of the site as well as the removal of the existing buildings and the rear canopy to the barn that the proposed conversion will preserve the openness of the Green Belt. The conversion works and proposed development will not result in a development that is otherwise harmful to the character and appearance of the surrounding countryside. Any impact that does arise is capable of mitigation.
- 6.15 NPPF paragraph 155(d) allows for the re-use of existing buildings again subject to a specific caveat that the building that is to be re-used is permanent and of substantial construction.
- 6.16 It is abundantly clear that the building is permanent. The application is accompanied by a structural survey and report. The report concludes that the building is of substantial and sound construction and that it is capable of withstanding the works necessary to convert the building to its proposed residential use.
- 6.17 In principle therefore the development should be considered as appropriate development in the Green Belt.

Residential amenity

- 6.18 The proposed conversion scheme ensures that three appropriately sized and configured residential units that meet the Nationally Described Space Standards will be provided, and all habitable rooms will have natural light and ventilation, thus ensuring an appropriate level of internal amenity for future occupiers. Externally, each unit will have appropriately sized private amenity space, and privacy screening will be provided between the units to safeguard the area closest to the rear of the units.
- 6.19 Continued use of the livery yard to the east of the application building will not result in an unacceptable impact on the occupiers of the proposed units. The proposed relationship and juxtaposition of the two uses is not unique and is commonly found where conversions take place of agricultural or other buildings.
- 6.20 The proposed development will have no impact on the amenity that occupiers of nearby residential units can reasonably expect to be able to continue to enjoy. The nearest dwellings are in excess of 110m from the site and are located on the west side of South Street which is a busy 'A' Road.

Ecology and Biodiversity

- 6.21 The accompanying Preliminary Ecological Appraisal (PEA) considers that there will be no direct impact on a nearby Local Wildlife Site (LWS), which is 50m from the east of the Site, but a Construction Management Plan (CMP) should be secured and implemented to minimise any dust, noise and light during construction.
- 6.22 Similarly, the CMP will be used to minimise any impacts to a nearby ancient woodland.
- 6.23 In terms of potential harm to protected species, this is summarised below:
- Amphibians: offence highly unlikely;
 - Reptiles: precautionary mitigation strategy;
 - Birds: consideration of timing of any clearance works;
 - Hazel dormouse: no impact;
 - Badger: a pre-commencement badger survey is recommended;
 - Bats: details of any lighting scheme should be secured by condition;
 - Other species: any areas where mammals could be sheltering should be hand searched prior to disturbance.
- 6.24 Ecological enhancements should be secured including provision of hedgehog nesting boxes, holes included in close boarded fencing, bird boxes on retained trees, swift bricks in new buildings, bat boxes attached to retained mature trees, native tree/shrub/hedgerow planting, climbing plants on walls and other vertical structures, wildflower plug/bulb planting in private gardens, use of grid mesh system with topsoil seeding to car parking areas, planting of trees suitable for gardens, such as birch or rowan, and establishment of fruit espaliers.
- 6.25 Overall, it is considered that subject to the above suggested conditions adopting a precautionary approach as well as ecological mitigation and enhancement measures, there will be no reasonable grounds to refuse this application to the impact of the development on the ecological value of the site.

Highways

- 6.26 The application site is accessed via an existing roadway leading from the A227 South Street, this has a 40mph speed limit past the site entrance. The access is currently gated with the gates set in excess of 10m from the edge of the carriageway. There is adequate visibility to the north and south of the access

point along the highway. The eastern side of the A227 has a pedestrian footway in the inside of a highway verge that extends northwards as far as the 30mph village limit of Meopham Green, where there is an uncontrolled crossing to the footway on the west side of the highway. Southwards, the footway extends as far as the entrance to the Hopehill Scout Campsite, before continuing southwards towards Culverstone Green via an uncontrolled crossing on the west side of the road.

- 6.27 CrashMap data indicates that there have been no injury accidents along the section of the A227 South Street in the vicinity of the application site in the last 5 years. Three injury incidents (one serious and two slight) have occurred in the vicinity of the access to the Scout Camp in the last 5 years. This is approximately 300m south of the application site access.
- 6.28 Appropriate parking provision to serve the development is indicated and the units will be provided with EV charging points.
- 6.29 The nearest bus stops are located approximately 440m to the north of the site's access onto the A227 close to the Meopham Veterinary Hospital and Steeles Lane. These are served by a number of school services in the morning and afternoon and also route 308 between Gravesend and Vigo with some extending to Sevenoaks which provides 6 trips in each direction Monday to Saturday on a roughly 2 hourly basis.
- 6.30 Both Culverstone Green and Meopham Green have a range of community facilities including health and education facilities as well as convenience retailing for day to day needs.
- 6.31 The application site is not located in an isolated countryside location but it is acknowledged that it is also not a highly sustainable in location and that some reliance on the private car for day to day needs is likely to be needed. This is recognised in paragraph 109 of the NPPF which advises that;

'However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

- 6.32 Paragraph 115 of the NPPF advises that;

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

It is contended in this case that neither of those circumstances would apply.

Other issues

- 6.33 The application site is located in Flood Zone One and as the site has an area of less than 1ha, a Flood Risk Assessment is not required. It is not located in an area at risk to Surface Water Flooding.
- 6.34 Gravesham Council cannot currently demonstrate a five-year supply of deliverable housing sites. The latest published figure as of 1 April 2022 shows supply was calculated as 2.9 years¹. They have also un-delivered in terms of the Housing Delivery Test (HDT) to the point that a presumption in favour of granting permission for sustainable development applies. The last published HDT measurement for the three years to 2022 published on 19 December 2023 indicated only 53% of the required number of dwellings had been delivered across the Borough. The site is considered to be a suitable windfall site and as such the proposed development accords with the advice in paragraph 60 of the NPPF.

¹ [GBC Housing Land Supply Statement March 2023](#)
PR4074

7 Conclusions

- 7.1 The proposed development is considered to be appropriate development in the Green Belt as it proposes the re-use of a permanent building that is of substantial construction and that will not conflict with the purposes of including land within the Green Belt and preserve its openness.
- 7.2 The proposals will not adversely affect the amenity of the occupiers of nearby dwellings given the separation distances involved, in excess of 110m to the closest with an intervening highway. The future occupiers of the development will also have an acceptable level of amenity.
- 7.3 There will be no adverse impact on highway safety arising from the development and the required Biodiversity Net Gain will be secured.
- 7.4 The Council's current lack of a five-year housing land supply and the presumption in favour of permitting development as a result of the consistent under-delivery of new dwellings against the Housing Delivery Test are factors that weigh significantly in favour of the approval of the application.
- 7.5 The proposed development being a small site that is capable of being delivered quickly and making a small but nevertheless important contribution to the delivery of housing within the District accords with the advice in paragraph 70 of the NPPF, particularly in an area where Development Plan policies are outdated in that they do not make specific provision for 10% of allocated sites being no greater than 1ha in area.
- 7.6 The proposals comply with both National and adopted Development Plan policy and should be approved without delay.