**RE: LAND TO THE SOUTH OF CHAIN HOUSE LANE, WHITESTAKE, SOUTH RIBBLE**

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**OPENING SUBMISSIONS OF THE LPA**

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## INTRODUCTION

1. This appeal concerns an outline application for up to 100 dwellings (including 30% Affordable Housing). All matters were reserved save for access. A full description of the development is contained in the SoCG (section 2). The application does not comprise EIA development.

2. In accordance with the recommendation to refuse (CD 4.1), the application was refused planning permission, in a decision notice dated 27th June 2019, for 3 reasons:

   *1. The application site is allocated as Safeguarded Land through Policy G3 of the South Ribble Local Plan. The proposal by virtue of its nature, scale and degree of permanence would be contrary to Policy G3 of the South Ribble Local Plan as the Council can demonstrate a 5 Year Housing Supply;*

   *2. The proposal by virtue of its nature, scale and degree of permanence would be contrary to Policy G3 of the South Ribble Local Plan as the development would harm the ability of the Council to manage the comprehensive development of the area. Therefore the scheme would not amount to a sustainable form of development.*

   *3. Insufficient evidence in the form of an Air Quality Assessment has not been submitted that demonstrate that the proposed development would not cause harm due to air pollution and therefore the proposal is contrary to Policy 30 of the Central Lancashire Core Strategy.*

3. Following RFR 3, an Air Quality Assessment (AQA) was prepared and submitted to the LPA (Aug 2019). The AQA demonstrates that the proposal would be compliant with Policy 30 JCS and would not cause unacceptable harm to air quality. RFR 3 was withdrawn by the LPA on 18th September 2019 (SoCG at 2.6).

4. A first Appeal was heard by Inspector Hunt BA (Hons) MA MRTPI between 12th and 15th November 2019. At the Appeal, it was the LPA's case that *inter alia*:[1]

   (i) There had not been a fn 37 review of Policy 4 JCS;
   (ii) If there had been a fn 37 review, there had been "*a significant change*" in circumstances since the review, comprising the introduction of the standard methodology for the calculation of Local Housing Need (and a significantly reduced need for housing);
   (iii) For both reasons, Policy 4 JCS was out of date;
   (iv) 5YHLS should be calculated using the standard methodology in NPPF (2018/19);
   (v) The LPA had a very healthy 5 year supply and there was no need for the development of safeguarded land;
   (vi) The development would harm the ability of the Council to manage the comprehensive development of the area. Therefore the scheme would not amount to a sustainable form of development.

5. In a decision letter, dated 13th December 2019, the appeal was dismissed. The Inspector concluded *inter alia* (CD 6.1):

   (i) There had not been a fn 37 review (DL 16-25);

[1] This is of necessity a précis of the LPA's case – see LPA Closing Submissions at AD 4

(ii) In any event, a "*significant change*" has taken place, since the claimed review (for the purposes of NPPF and NPPG), comprising the introduction of the standard methodology in the NPPF (2018) and the Council's significantly lower figure arising from the standard method calculation (see DL 26-28, 37 and 85);

(iii) The Policy 4 JCS housing requirement of 417 d/pa was "out of date" for several reasons, including: "*the 'significant change' resulting from the introduction of the standard method in the 2018 Framework and Council's significantly lower figure arising from the standard method calculation*" (DL 37);

(iv) The NPPF LHN figure should be used to calculate 5YHLS. On that basis, the LPA has > 10 years' supply;

(v) The distributional consequences of the LHN figures do not render Policy G3 out of date. There had not been a radical re-distribution (DL 87 and 88);

(vi) The proposal would prejudice potential longer term, comprehensive development of the land contrary to Policy G3 (DL 59-66);

(vii) Development of the appeal site in isolation would represent "*a disconnected pocket of housing in this otherwise undeveloped area*" (DL 71 and 72);

(viii) Planning permission was refused and the Appeal was dismissed (DL 96).

6. The Appellant made a statutory challenge of this decision on 5 grounds, which were (so far as relevant):[2]

(i) **Ground 1** – the Inspector fell into error in concluding that Memorandum of Understanding (MOU) 1 and the processes which preceded it did not amount to a fn 37 review (para 24);

[2] See CD 7.1 paras 24 *et seq*

(ii) **Ground 3** – in concluding that there had been a "*significant change*" since the review, the Inspector was guilty of a clear misinterpretation of the PPG in concluding that it covered a situation where an existing plan figure was significantly *above* (not *below*) the Local Housing Need figure generated using the standard method. The PPG was therefore rendered pointless (para 33);

(iii) **Ground 5** – as a consequence of the use of the standard method, the distributional consequences which would arise across the Central Lancs HMA would render Policy G3 out of date: the Inspector's reasons were lawfully inadequate in concluding that Policy G3 was not out of date contrary to this assertion (para 35).

7. The Inspector's conclusions regarding: (i) the prejudice to comprehensive development; and (ii) harm arising from the isolated pocket of development were not challenged. They remain as material considerations in the determination of this Appeal (see ***Davison v Elmbridge BC*** [2019] EWHC 1409 (Admin).

8. In the Planning Court, **it was undisputed that Wainhomes (as Claimant) had to win on <u>both</u> Grounds 1 and 3** for the Claim to be quashed on these grounds (para 39). This is entirely self-evident. In the event that there was a review, the LPA had argued and the Inspector had agreed that there had been a significant change in circumstances which nonetheless rendered Policy 4 JCS out of date (<u>even if</u> it had been reviewed).

9. Ground 1 had merit (see para 40). Dove J held that the Inspector failed to explain: (i) why the whole of Policy 4 had to be reviewed; and (ii) why the MOU did not constitute a fn 37 review of the whole policy (para 40).

10. However, <u>crucially</u> for the determination of this Appeal, **Ground 3 failed**. Dove J held (emphasis added):

*42. Turning to ground 3, it needs to be borne in mind that the passage from the PPG in relation to the need to review plans when there has been a significant change arose in the context of the arguments about whether or not Core Strategy Policy 4(a) was out of date and, in particular, was relied upon in paragraph 37 of the decision as one of the reasons for the Inspector's conclusion that Core Strategy Policy 4(a) was out of date.* ***Whilst it is fair to observe that the only significant change specifically instanced in the PPG is where a housing requirement is found to be significantly below the number generated using the standard method, in my view this passage of the PPG needs to be read purposefully and as a whole****. The third paragraph of the passage of guidance makes clear that a plan will continue to be treated as up to date "unless there have been significant changes as outlined below". The following paragraph provides some examples where there may have been significant change but, as Mr Cannock points out,* ***the question of whether or not there has been a significant change warranting a review of the plan on the basis that it is not up to date is not curtailed or circumscribed by the contents of the final paragraph****.*

*43.* ***There may be many material changes in the planning circumstances of a local authority's area which would properly render their existing plan policies out of date and in need of whole or partial review. I am unable to accept Mr Fraser's submission that it is impermissible to regard the emergence of a local housing need figure which is greatly reduced from that in an extant development plan policy as having the potential to amount to a significant change****. Whilst he is entitled to point to the wider national planning policy context of boosting significantly the supply of housing land, as Mr Cannock points out in his submissions, the use of the standard method to derive local housing need is part and parcel of the Framework's policies to achieve that objective. Moreover,* ***the question of whether or not any change in circumstances is significant is***

***one which has to be taken on the basis of not only the salient facts of the case, but also other national and local planning policy considerations which may be involved. In short, in my view, the language of the PPG and its proper interpretation did not constrain the Inspector and preclude her from reaching the conclusion that she did, namely that the significant difference between the housing requirement in Core Strategy Policy 4(a) and that generated by the standard method was capable of amounting to a significant change rendering Core Strategy Policy 4(a) out of date.***

11. This Judgment is of central relevance to the determination of this Appeal. **It meant that both Grounds 1 and 3 failed** and the decision would not have been quashed as a result. Dove J specifically endorses the conclusion that: "… ***the significant difference between the housing requirement in Core Strategy Policy 4(a) and that generated by the standard method was capable of amounting to a significant change rendering Core Strategy Policy 4(a) out of date. That was a planning judgment which*** **[the previous Planning Inspector]** ***was entitled to reach and was properly reasoned in her conclusions***."

12. This decision of the Planning Court is binding on the determination of this Appeal (unlike Appeal Decisions). **If applied to this Appeal, it means that there has been a significant change in circumstances, since the fn 37 review in 2017, which renders Policy 4 out of date**. The 5 year supply calculation must be determined against the LHN figure in NPPF (2018/19) derived using the standard methodology.

13. The SoS conceded in respect of Ground 5. The Judge agreed and the decision letter was quashed on Ground 5 alone.

14. The LPA submitted a revised SoC (Oct 2020). Further, the LPA determined a duplicate application (see Committee Report CD 4.3). On 18th December 2020, the LPA resolved to refuse the identical duplicate scheme for 2 reasons:

*1. The application site is allocated as Safeguarded Land through Policy G3 of the South Ribble Local Plan. The proposal by virtue of its nature, scale and degree of permanence would be contrary to Policy G3 of the South Ribble Local Plan, to which substantial weight should attach. The Council can demonstrate a 5 Year Housing Supply, which should be calculated against the Local Housing Need figure of 191 d/pa. Applying the tilted balance, the proposal does not constitute sustainable development. Material considerations do not justify the conflict with the development plan.*

*2. The proposal by virtue of its nature, scale and degree of permanence would be contrary to Policy G3 of the South Ribble Local Plan as the development would harm the ability of the Council to manage the comprehensive development of the area. Therefore, the scheme would not amount to a sustainable form of development.*

15. In resolving to oppose the Appeal, the LPA concluded (mindful of Dove J's conclusion on Ground 5) that Policy G3 was technically out of date because of the significant change in the distribution of housing across the HMA. Such a re-distribution of housing *could* result in the re-drawing of safeguarded land boundaries. However, there is significantly less need for housing in South Ribble (applying LHN) and the need for comprehensive development remains regardless of the housing requirement. The policy is only technically out of date and significant weight should nonetheless be attached to Policy G3, as the significant change in distribution across the HMA has resulted in a significant re-distribution of housing *away* from South Ribble and Preston but *towards* Chorley. There is no need for the development of safeguarded land in South Ribble at this time.

16. As both Policy 4 JCS and G3 are out of date, the tilted balance in NPPF 11 is engaged.

## MAIN ISSUES

17. The Main Issues[3] reflect the reasons for refusal:

(i) On what basis should the housing land supply be calculated?
   (a) There is a binary choice between Policy 4 JCS (the Appellant's position) and the Standard Methodology in NPPF 2018/19 (the LPA);
   (b) There is a dispute over the deliverable supply;

(ii) Whether the granting of planning permission would prejudice the comprehensive delivery of development in this area?

(iii) The proposal is contrary to policy G3 and contrary to the development plan as a whole. Applying s.38(6) P&CPA 2004, are there material considerations which justify the grant of consent, contrary to the development plan?

(iv) Applying the tilted balance, does the proposal comprise sustainable development?

## THE STATUTORY TEST

18. The Main Issues fall to be determined in accordance with the development plan unless material considerations indicate otherwise (s.38(6) P&CPA 2004).

## THE DEVELOPMENT PLAN

19. So far as relevant, the statutory development plan comprises:

- The Central Lancs Joint Core Strategy (JCS), adopted July 2012;
- The South Ribble Local Plan (2012-2026), adopted July 2015.

[3] They have been discussed at the CMC and appear at SoCG at 6.1

20. The proposal conflicts with Policy G3. It conflicts with the development plan as a whole. This is not in dispute. The proposal must, therefore, be refused unless material considerations indicate otherwise.

**Policy 4 JCS**

21. The Inspector must form a planning judgment on whether Policy 4 is "*out of date*" and/or consistent with the NPPF. In ***Bloor Homes***, Lindblom J held that a planning policy may be found to be "out of date" because it has been overtaken by things that have happened since it was adopted, either on the ground or in some change in national policy, or for some other reason (CD 7.11 para 45). Policy 4 is no different from any other policy in this regard.

22. The RSS for the North West was based on the PPS 3: Housing methodology (see PPS 3 para 33). It was based on the 2003 household projections (1998-2003) which resulted in 416,000 households across the region. The 2003 HHP's were then manually re-distributed across the North West (and Central Lancs) in accordance with the RSS spatial strategy. The RSS housing requirement (2003-2021) was:

- Chorley - 417 d/pa;
- Preston - 507 d/pa;
- South Ribble - 417 d/pa;
- Total - 1341 d/pa.

23. The JCS was submitted for examination in 2011 (NI at 5.49). At the 2011 EiP (June/July 2011), the housing requirement was 80% of the RS housing requirement (which was extant at the time). In a letter, dated 15th November 2011, Inspector Hollocks expressed the view that the JCS was not sound, as it did not comply with the RS. The Inspector stated that the JCS should adopt the annual requirement of the RS, consistent with the

legal requirement to be in general conformity with the RS. The Inspector was telling the Central Lancs LPAs to simply adopt the RS housing requirement (without further analysis). The JCS response was to adopt the RS housing requirement. MM1 of the JCS was "the adoption" of the RS annual housing requirements (see CD 1.13). It could not be clearer that the JCS simply rolled forward the RS housing requirements without further analysis, consistent with the requirement of the EiP Inspector (see CD 1.13 IR 8-11).

24. The second EiP was held in March 2012 (prior to the publication of the NPPF). In his report (dated 7th June 2012), the Inspector commended the approach of the JCS and considered it to be sound (CD 1.13 IR 47-49). However, the IR was written prior to the clarification on the interpretation of the approach required by NPPF 47 (in ***Hunston*** and ***Gallagher***).

25. Policy 4 JCS therefore simply provides for the RS housing requirement (for the same reasons as given in the preparation of the RS), with 702 dwellings to address under-provision (against the RS requirement).

26. In such circumstances, the LPA submits that:

(i) The JCS was required to be in general conformity with the RS;
(ii) The Inspector required the JCS to adopt the RS housing requirement;
(iii) Policy 4 is based simply on the RSS for the NW;
(iv) Policy 4 is based on the RSS/PPS 3 methodology, which resolved a housing requirement at the regional level before it was manually re-distributed;
(v) Policy 4 is based on the 2003 household projections, which are based on evidence between 1998 and 2003;
(vi) The RSS housing requirement ran from 2003 to 2021;

27. It follows that Policy 4 cannot be used as a proxy for an objective assessment of housing need. The housing requirement in the CS is significantly out of date and inconsistent with the NPPF.

**Review of Policy 4**

28. NPPF 73 and fn 37 provide (so far as relevant that):

> *Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies[36], or against their local housing need where the strategic policies are more than five years old[37] [Unless these strategic policies have been reviewed and found not to require updating. Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance].*

29. It is important to note (and it is agreed) that **NPPF 73 permits of a binary choice**. The decision-maker can use *either* Policy 4 *or* (as it is out of date) the LHN figure of 191 d/pa. NPPF 73 is addressing the correct basis for the assessment of housing land supply. It is not addressing the separate/distinct issue of what should comprise the housing requirement for the purposes of the emerging Local Plan. **The two processes (review and housing requirement for updating the Plan) should not be conflated**. The housing requirement in the eLP is not a matter for this Inquiry. It is a matter for the EiP. On that basis, it is agreed (SoCG at 6.1) that there is a binary choice between Policy 4 and the LHN figures.

30. It is common ground that Policy 4 is more than 5 years old. It is also common ground that there has been a review of Policy 4 (for the purposes of fn 37). This was addressed in Ground 1. The review comprised a process which culminated in MOU 1 (CD 1.8). MOU 1 was *not* the review. It was the *product* of the review. MOU 1 confirmed the level and

amount of housing in the HMA, in the light of the SHMA (Aug 2017). The MOU was signed on 3rd October 2017.

**Significant Change in Circumstances**

31. **The LPA submit (as they submitted at the First Inquiry and in the Planning Court) that there has been a significant change in circumstances since the completion of the review**. This is the central point in issue in respect of Issue 1.

32. The NPPG (which formed the basis of the Ground 3 challenge) reads in full:

> ***How often should a plan or policies be reviewed?***
> *To be effective plans need to be kept up-to-date. The National Planning Policy Framework states policies in local plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary.*
>
> *Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years.* ***Reviews should be proportionate to the issues in hand****. Plans may be found sound conditional upon a plan update in whole or in part within 5 years of the date of adoption.* ***Where a review was undertaken prior to publication of the Framework (27 July 2018) but within the last 5 years, then that plan will continue to constitute the up-to-date plan policies unless there have been significant changes as outlined below****.*
>
> *There will be occasions where there are significant changes in circumstances which may mean it is necessary to review the relevant strategic policies earlier than the statutory minimum of 5 years, for example, where new cross-boundary matters arise.* ***Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method****, or has been subject to a cap where the plan has been*

*adopted using the standard method. This is to ensure that all housing need is planned for a quickly as reasonably possible.*

*Paragraph: 062 Reference ID: 61-062-20190315*

*Revision date: 15 03 2019*

33. In this case, there have unanswerably been significant changes. The significant change is not the introduction of new NPPF *per se* (in 2018). Rather, it is the practical consequences of the new National Planning Policy which constitute the significant change, comprising:

(i) The significant change in <u>the methodology</u> for the calculation of local housing need, using the standard methodology (see NPPF 59, 60 and 73);
(ii) The significant change (reduction) in the housing figures for South Ribble, using the standard methodology;
(iii) The significant change (reduction) in the housing figures for the HMA, using the standard methodology;
(iv) The significant change in the distribution of housing across the Central Lancs.

34. It is not (yet) known whether the Appellant accepts that there has been a significant change since the 2017 review. Despite this being a central issue in the statutory challenge and the key issue in the determination of this Appeal, it is not addressed (adequately or at all) in the written evidence of BP (see especially 7.21-7.24).

35. The LPA submits it is unanswerable that there has been a significant change which renders Policy 4 out of date (for the purposes of ***Bloor Homes*** and the PPG).

36. Firstly, the standard methodology is significantly different from the PPS 3 methodology, which formed the basis of Policy 4. Further, the standard methodology is significantly different from the NPPF (2012) methodology. Indeed, the standard methodology was specifically *intended* to be different from previous methodologies, in order to avoid time-consuming, costly and opaque discussions about housing need (see the White Paper). The Appellant does not argue the contrary.

37. Secondly, it is agreed that the application of the standard methodology results in South Ribble's housing figure significantly reducing from 417d/pa to 191 d/pa. This is a significant change and the Appellant does not argue the contrary.

38. Thirdly, it is agreed that the application of the standard methodology results in the Central Lancs total housing figure significantly reducing from 1341 d/pa to 1010 d/pa. This is a significant change and the Appellant does not argue the contrary.

39. Fourthly, it is agreed[4] that the application of the standard methodology results in a significant change in the distribution of housing across Central Lancs. Housing moves away from Preston and South Ribble towards Chorley (in the context of a significantly reduced total figure):

**Table 7.1 Distribution of Housing Need – Policy 4 & Standard Method**

| | Chorley | Preston | South Ribble | Central Lancashire |
|---|---|---|---|---|
| **Standard Method LHN** | 569 | 250 | 191 | 1010 |
| | 56% | 25% | 19% | 100% |
| **CS Policy 4 - Annual Requirement** | 417 | 507 | 417 | 1341 |
| | 31% | 38% | 31% | 100% |

[4] See Ground 1 and Appellants' Planning Addendum

40. **It is, therefore, clear that there have been significant changes in circumstances, since the 2017 review, which render Policy 4 out of date. Indeed, that conclusion has been expressly upheld by Dove J in the Planning Court (*supra*)**.

**Counter-Argument:**

41. The Appellant does not address that point "head-on". Rather, BP raises a counter-argument (at 7.22). It is asserted that[5] as long as Policy 4 has been reviewed (seemingly whether or not there has been a "significant change"), it should form the basis of the HLS calculation.

42. That proposition cannot be correct. It would amount to *ignoring* significant changes of circumstances which have occurred since 2017, which would contradict elementary principle, which requires a planning judgment (on whether policy 4 is out of date) to take into account all material considerations. Further, this is precisely the point raised and rejected in the last Appeal, which was upheld by Dove J.

43. Accordingly, the LPA firmly submits that this Inquiry must exercise a planning judgment on whether there has been a significant change in circumstances, such that Policy 4 is out of date. The review cannot preclude/prevent such a judgment being undertaken (as Dove J held in the light of Ground 1 *supra*).

44. The LPA's position is not changed by the Cardwell Farm DL. This DL is capable of being a material consideration. However, it is not binding on this Inspector and he is free to disagree with it, providing reasons are given. South Ribble did not appear at that Inquiry, which heard different evidence/submissions, from different witnesses from a different authority.

[5] As best as it can be understood at this stage

Further, Preston have indicated that their legal team consider that there are grounds for the decision to be challenged. A decision has yet to be taken (and they have 6 weeks in which to make the statutory challenge). In such circumstances, this Inquiry must reach its own view on the issues above.

45. Further or alternatively, the LPA consider that the decision is legally flawed and/or they simply disagree with it as a matter of judgment. The decision fails to address (adequately or at all) whether there has been a significant change in circumstances (despite the issue being raised at DL 32). It fails to take the decision of Dove J on Ground 3 into account at all. The decision therefore fails to take into account material considerations in deciding whether policy 4 is out of date. Further or alternatively, the Inspector fails to give reasons why there has not been a significant change in circumstances, contrary to the submissions of Preston (see DL 32) and the clear conclusions of Dove J (*supra*).

46. Rather, the Inspector appears to consider whether there has been a second review (see DL 33-40). However, there is no requirement for there to be a second review before it can be concluded that there has been a significant change. A planning judgment is simply not limited in that manner. However, to the extent that the Inspector's approach is (somehow) lawful, the LPA submit:

(i) The position in South Ribble is materially different;

(ii) South Ribble has not made any decision which suggests that the review which underpinned MOU 2 is not a proper basis for decision making (cf DL 39 and 40). The use of the standard method was <u>not</u> called into question at Pear Tree Lane. On the contrary, it was applied. Rather, it was <u>the re-distribution</u> of the LHN across Central Lancs which was criticised. That is no part of the LPA's case;

(iii) Further or alternatively, since the Pear Tree Lane Inquiry and in the light of evidence at this Inquiry and Cardwell Farm, the LPA has undertaken a further review and concluded that the 5 year supply should be calculated using the LHN.

47. It follows that the Cardwell Farm decision is not a material consideration of any material weight. Rather, it is flawed and inconsistent with the Pear Tree Lane decision and the judgment of Dove J. It leaves the Central Lancs authority in the unhappy position of having inconsistent decisions, resulting in different approaches being taken across the same HMA. This must be addressed (now) in the Courts and at this Inquiry. Whilst the Appellant has opportunistically decided to make a cost application, the LPA's position is not (even arguably) unreasonable. Rather, it is the correct one.

**PLANNING BALANCE**

48. It follows that the LHN figure forms the basis of the 5YHLS. Applying the SoCG HLS, the LPA has between **a 12.6 year and 10.1 year supply**.

49. The difference between the supply (2542 cf 2036) is not material. The need for the housing round table is unclear (as the LPA has stated in correspondence). The difference in supply makes no material difference on either party's case (as set out in the written proofs).

50. It is quite clear that there is, therefore, no need for safeguarded land. Policy G3 retains significant weight in the tilted balance (per the ***Gladman*** decision). Policy G3 is consistent with the NPPF and this proposal is clearly contrary to both G3 and the NPPF (139(c) and (d)). Whilst the proposal will deliver benefits, these are benefits which would accrue from the delivery of *any* housing on safeguarded land. In such circumstances,

the conflict with policies in the development plan significantly and demonstrably outweighs such generic benefits.

51. Further or alternatively, even if it is concluded that there is not a 5YHLS, the LPA contends that: (i) that part of policy G3 which requires comprehensive development retains significant weight; (ii) the proposal fails to deliver comprehensive development (for the reasons given by NI and the previous Inspector); (iii) this is a policy requirement even where development on safeguarded land might otherwise be justified; (iv) it justifies the refusal of the proposal in its own right.

**CONCLUSION**

52. It is, therefore, the LPA's case that planning permission should be refused.

**GILES CANNOCK QC**
**Kings Chambers**
**16th March 2021**