
OUR REF: 2617.PN

**LAND ADJACENT & WITHIN FINCHES FARM, LABOUR IN VAIN ROAD,
STANSTED, TN15 7NY**

Redevelopment of former builders storage yard including demolition of existing buildings as well as demolition of buildings within Finches Farm and erection of 1 No. detached chalet bungalow and associated alterations to existing vehicular access and provision of parking, turning and landscaping

PLANNING, DESIGN AND ACCESS STATEMENT

JUNE 2021

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APPLICATION DOCUMENTS

- Arboricultural Impact Assessment (Lloyd Bore)**
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- Planning, Design and Access Statement (GSP)**

1.0 INTRODUCTION

- 1.1** This Statement is prepared in support of an application made to Tonbridge and Malling Borough Council (TMBC) for the following:

Redevelopment of former builders storage yard including demolition of existing buildings as well as demolition of buildings within Finches Farm and erection of 1 No. detached chalet bungalow and associated alterations to existing vehicular access and provision of parking, turning and landscaping

2.0 SITE CONTEXT

- 2.1** The size of the application site amounts to 0.05 ha, inclusive of the site of the buildings to be demolished within Finches Farm, which is in residential use. The majority of the application site was previously in use since 1968 as a builder's storage yard, last occupied by W. H. Simmonds up to 22nd June 2012, which is the date that the applicants purchased the site. The application site is entirely previously developed according to the definition within Annex 2 of the National Planning Policy Framework, either by virtue of the garden land to the west, which is not within a built up area, or the former builders storage yard, which comprises of considerable hardstanding or built footprint.
- 2.2** The applicants had experienced considerable amenity harm from the use of the site as a builders storage yard, including permanently parked skips outside the fence on the verge, mess, bonfires and noise. The site has remained vacant since the change in ownership, although buildings (and indeed materials) used by W. H. Simmonds remain on site and it is understood that business rates have continued to be paid. One of the retained buildings is a garage that benefits from a direct vehicular access on to Labour in Vain Road. There is a further vehicular access to the west of this via double timber gates. There is evidence of a third former vehicular access further to the west of the site.
- 2.3** The site lies within the Metropolitan Green Belt. An Area of Outstanding Beauty exists on the opposite side of the road. The site is accessed via a rural lane with a 60 mph limit off the A20 and to the north of the M20. The majority of the lane is narrow; however, the subject section of the lane is both in a dip and comparatively wide. A low adjacent verge to the subject side is often used as convenient passing place. Despite its rural characteristics, housing is the dominant built form that lines Labour in Vain Road. The existing builders storage yard is therefore at odds with this.

3.0 RELEVANT PLANNING HISTORY

- 3.1** MK/4/58/662 (59/10888/OLD) – planning permission was granted in 1959 for the demolition of a residential cottage and the change in the use of the land to a builders store yard to re-locate the existing builders yard some 230m to the west. This does not appear to have been implemented.
- 3.2** 82/10093/FUL - rebuilding of existing store building. This was granted planning permission in October 1982. There are no plans on the Council's public access system to be certain as to which building this permission relates to.

4.0 PROPOSED DEVELOPMENT

- 4.1 The proposal involves trading off the existing built form. The applicant is also willing to sacrifice future permitted development rights relating to the builders yard plot, allowing greater control over any further extensions or alterations to the proposed new dwelling.
- 4.2 This scheme represents an alternative future use and development of the site which will put to better use this previously developed curtilage into use for residential purposes. This will add to the stock of high-quality dwellings in the Borough.
- 4.3 The proposed chalet bungalow will be situated fairly centrally within the site with the majority of the bulk aligning north to south. This is intended to minimise the presence of built form as one passes along this section of Labour in Vain Road. The remaining 'T-shaped' building will run east to west but up relatively close to the rear, northern boundary.
- 4.4 The proposed chalet bungalow will be constructed in a traditional style with the use of suitable rural materials utilising weatherboarding with a plain tiled roof as shown on the proposed application drawings. The dwelling will be of an attractive bespoke design and appearance and will represent a significant benefit in visual terms in comparison to the existing built form and derelict nature of this previously developed site.
- 4.5 The ground floor layout of the dwelling features a hall, WC and shower, a study, a living room and mixed kitchen and dining area. At the first floor there will be three bedrooms, an en-suite and a bathroom.
- 4.6 In addition to the removal of a number of buildings and a significant amount of hardstanding, an opportunity also exists to propose a landscaping scheme that reflects the character of the area and further adds to the visual positives of the overall development. The development also entails the removal of the three existing vehicular accesses on to the highway and replacement with one single access point that will also incorporate a more formal passing place adjacent to the highway that can also be used as a turning area for vehicles reversing out of the site from the two parking spaces that are shown on the proposed site plan.

5.0 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 this, 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 at every level 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.

Development Plan

- 5.5 In terms of the adopted Development Plan for TMBC, this comprises of the following documents that are relevant to this application:
- Tonbridge and Malling Core Strategy (CS) – adopted September 2007;
 - Tonbridge and Malling Managing Development and the Environment Development Planning Document (MDEDPD) – adopted in April 2010.
- 5.6 From the CS it is considered the following policies are relevant:
- CP1: Sustainable Development
 - CP3: Metropolitan Green Belt
 - CP6: Separate Identity of Settlements
 - CP15: Housing Provision
 - CP14: Development in the Countryside
 - CP24: Achieving a High Quality Environment
 - CP26: Safeguarding of Community Services and Transport
- 5.7 From the MDEDPD it is considered the following policies are relevant:
- NE2: Biodiversity Networks;
 - NE3: Impact of Development on Biodiversity;
 - NE4: Trees, Hedgerows and Woodland;
 - SQ1: Landscape, Townscape Protection and Enhancement;
 - SQ8: Road Safety;
 - DC2: Replacement of Rural Buildings.

Other Material Considerations

The Framework

- 5.8 The Framework at Paragraph 11 sets out the circumstances where if the development plan is out of date there is a presumption in favour of granting planning permission. In this respect it is noted that TMBC is unable to demonstrate a five-year supply of housing land, meaning the development plan is out of date in respect of its housing policies. The provision of new housing carries significant weight. It is noted that the paragraph indicates that this is not the case within protected areas (such as Green Belts) but only where the application of such policies elsewhere in the Framework provide a ‘*clear reason*’ for refusing the development proposed.
- 5.9 Paragraph 59 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. Paragraph 68 of the 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.
- 5.10 Paragraph 117 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 118 seeks to promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. Paragraph 121 states that local planning authorities should take a positive approach to applications for alternative uses of land which is currently developed, and is not allocated for a specific purpose in development plans, where this would help to meet identified development needs. In particular they should support proposals to use retail and employment land for homes in areas of high housing demand provided that this does not harm the economy or vitality and viability of town centres. It is noted that the application of these paragraphs from the Framework, along with paragraph 59, are not dependent on whether an authority has a five-year housing land supply (5YHLS).
- 5.11 Paragraph 130 of the Framework notes that “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”
- 5.12 Paragraph 145 of the Framework confirms that the construction of new buildings should be considered inappropriate in the Green Belt unless it is for (amongst others) (g) the complete redevelopment of redundant previously developed land which would not have a greater impact on the openness of the Green Belt than the existing development.
- 5.13 Paragraph 170 of the Framework sets out several ways in which decisions should contribute to and enhance the natural and local environment. Given that the site is not on the coast, it is considered that the most relevant parts of this paragraph are as follows:

- (a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- (f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

5.14 The following are also material considerations:

- Nationally Described Space Standards (NDSS) (March 2015);
- National Design Guide (NDG) (October 2019).

6.0 KEY ISSUES

6.1 Given the above policy considerations and the nature of the proposal, it is considered that the relevant key planning issues are as follows:

- (a) Appropriateness of the development in the Green Belt;
- (b) Five-year Housing Land Supply;
- (c) Effect on the Countryside;
- (d) Design;
- (e) Parking and Highway Safety;
- (f) Living conditions;
- (g) Contamination.

(a) Appropriateness of the Development in the Green Belt

6.2 The proposal involves the complete redevelopment of a previously developed site. As such, the key part of the Framework in connection with this development and its impact on the Green Belt is part (g) of paragraph 145 of the Framework. This permits the complete redevelopment of previously developed land whether redundant or in continuing use (excluding temporary buildings) subject to that development not having a greater impact on the openness of the Green Belt than the existing development. The application of paragraph 145 requires no test as to whether the development conflicts with the purposes of Green Belt land. There should also be an acceptance of the lawful nature of the use of the Site as a builders storage yard, which can include activity and traffic movements by staff, as well as collections and deliveries of, for example, building materials, equipment and waste.

Extent of Built Form

- 6.3 The existing block plan confirms both the footprint and volume of the five buildings that are to be demolished as part of this development. This concludes that the existing volume of built form is 551m³. The proposed block plan confirms a very modest increase of 2m³ to 553m³. It is considered that such an increase is non-material. It is therefore considered that the proposed built form meets the test of paragraph 145(g) in respect of it not having a greater impact on the openness of the Green Belt when compared with the existing development.

Visual Impact

- 6.4 Whilst the absence of development takes precedence on the issue of openness, as has been held in multiple Court cases, the weight given to the issue of visual impact on the Green Belt is a matter of planning judgement for the decision maker. In this case, existing buildings are somewhat scattered across the site and in terms of openness this has an impact on the Green Belt. In visual terms the site will benefit from the uplift resulting from the construction of the proposed scheme which will be accommodated easily into the main built footprint and building line and will result in the removal of buildings from the periphery of the curtilage and the concentration of built development towards the centre of the site in a coherent, planned and well laid out form, improving the effect of any development within the site upon the countryside and ensuring compliance with paragraph 134 of the Framework.
- 6.5 Views of the site are entirely limited to passing along Labour in Vain Road. The development will sit in front of trees along the rear boundary within the curtilage of Finches Farm. Allowing this residential redevelopment of the site will reintroduce stewardship of the site and will address the vacant appearance of a site that historically has been used for purposes not in keeping with the surrounding area. It will also introduce natural surveillance to this relatively secluded part of the road, to the benefit of the owners of the subject site as well as adjoining and adjacent landowners.
- 6.6 A detailed Landscape Plan prepared by Lloyd Bore is also submitted as part of the application. It illustrates full details of proposed soft landscaping and boundary treatment. This includes the retention of the English Cherry Laurels but the removal of the non-native Leyland Cypress (G6) with native planting in its place and around the retained spruce tree, in order to retain a high level of screening of the new house from the applicant's garden to the north. Wild privet and holly (both large native evergreen shrubs) and hornbeam trees that have a dense crown and retain their leaves for a long time, will help ensure this is the case. The planting in front of any boundary enclosures will have a positive effect on the street scene. Overall, it is considered that the extensive level of native landscaping should be seen as a benefit compared with the existing situation, and that the development provides an opportunity to significantly improve the appearance of this Green Belt site.
- 6.7 To conclude on this issue, in the case of Samuel Smith Old Brewery and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd. from 16 March

2018, paragraph 39 of the judgment confirms that the term ‘preserve’ “cannot mean that a proposal can only be regarded as ‘not inappropriate in Green Belt’ if the openness of the Green Belt would be left entirely unchanged. It can only sensibly mean that the effects on openness must not be harmful.” The applicants contend that in this case any changes to the openness of this Green Belt site as a result of the proposed development, coupled with expected restrictive conditions, will be positive and by no means harmful. The proposal is entirely appropriate development in the Green Belt.

(b) Five-Year Housing Land Supply (5YHLS)

- 6.8 CS Policy CP1 advises that provision will be made for housing to meet the needs of existing and future residents and that the need for development will be balanced against the need to protect and enhance the natural and built environment.
- 6.9 TMBC cannot presently demonstrate an up to date five-year supply of housing when measured against its objectively assessed need meaning that the presumption in favour of sustainable development, set out in paragraph 11(d) of the Framework may apply. In their latest published figures, it is said that their supply 3.7 years. For decisions this means:
- (d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- (i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*
- 6.10 Such areas of protection as referenced in paragraph 11(d) include Green Belts. An assessment as to the impact on the Green Belt must be completed prior to determining as to whether the presumption in favour of sustainable development can be applied to this proposal. The wording within the Framework suggests that the measure and extent of any identified harm must amount to a *clear* reason for refusing proposed development.
- 6.11 As a consequence of the assessment carried out above, there is no *clear* reason for refusing the proposed development in connection with harm to the Green Belt having instead concluded that the development would have a positive effect on the Green Belt.
- 6.12 In addition, the proposed redevelopment of the site will assist with delivering an additional residential unit, making a positive contribution to TMBC’s objectively assessed housing needs. There are also social and economic benefits particularly during the period of construction, whilst the proposal presents an opportunity to provide a net gain in planting and landscaping, which can be secured by condition and result in an overall loss in hardstanding and built footprint within the application site.

- 6.13 The subsequent sections to this statement will assess whether there is any other significant or demonstrable harm in relation to part (ii) of paragraph 11(d).

(c) Effect on the Countryside

- 6.14 In addition to being within the Green Belt, the site is also within the countryside. In this regard, policies CP6, CP14 and DC2 would normally all be relevant. However, owing to the absence of a five-year housing supply these development plan policies are out of date. For the sake of completeness, and in case TMBC disagree, an assessment of the proposal against these policies is set out in subsequent paragraphs.
- 6.15 In relation to CP6, this policy is concerned with the retention of the setting of settlements. The policy states that development is not permitted within the countryside or on the edge of a settlement where it might unduly erode the separate identity of settlements or harm the setting or character of the settlement when viewed from the countryside or from adjoining settlements. The site is extremely secluded and is previously developed land. The existing lawful use and built form is out of keeping and the separating distance from the nearest settlement will ensure no erosion of or coalescence between settlements.
- 6.16 In relation to CP14, it is noted that this policy aims to restrict development in the countryside to (amongst others) (b) the one-for-one replacement, or appropriate extension but the policy does not specifically address the issue of a replacement residential building when the existing building is not in residential use. However, policy DC2 of the MDEDPD does cover this type of development.
- 6.17 The pre-amble to policy DC2 advises that the: “replacement of buildings will be favoured where this would result in a more acceptable and sustainable form of development than would be achieved by the conversion of an existing building and bring about an environmental improvement in terms of the impact of the development on its surroundings”. It is considered that this will be the case, in terms of there being significant positives in respect of visual impact whilst the existing buildings are inefficient in terms of their energy usage with poor thermal performance with a lawful use that is out of keeping with the surrounding area. As an employment site in this location, this would have created a degree of traffic far in excess of a single residential unit, once factoring in customers, staff and deliveries. The policy wording goes on to make clear that all of the following relevant criteria must also be met. An assessment of the various parts to this policy follows.

(a) Must not be materially larger and must be appropriate in scale and design

- 6.18 This issue is covered in the Green Belt section above. The volume of the proposed built form will be no more than already exists and will comprise of a low ridge that will be of a lesser scale than the majority of residential properties that exist nearby. With its rural design features, the structure is entirely appropriate and will enhance the immediate setting. As such, no conflict with this part of the policy can be demonstrated.

(b) The proposal does not result in the fragmentation and/or severance of an agricultural land holding creating a non-viable agricultural unit

- 6.19 There is no ongoing agricultural enterprise, hence, the proposal will not result in a conflict with this part of the policy.

(c) Full account is taken of any biodiversity interest

- 6.20 This matter is addressed in detail in the accompanying updated phase 1 ecological report. Taking account of the vegetation and trees that are to be retained, the report does not recommend any further surveys of protected species, subject to the retention of tree line TN1 and native planting being incorporated into the proposals, although there are a number of precautionary recommendations, including in relation to dormouse nests if the Hazel tree on the southern boundary is to be removed.

- 6.21 In respect of mitigation measures and enhancements, the phase 1 ecological report recommends species-rich hedgerows, climbing plants and fruit trees as well as the provision of enhancements for hedgehogs and breeding birds. Vegetation removal should be avoided between bird breeding season from March to August (inclusive). The report also recommends that external lighting is minimised. All of these measures can be secured by condition.

(d) It is not in an isolated position in relation to infrastructure and services

- 6.22 Paragraph 79 of the Framework states that planning policies and decisions should avoid the development of isolated homes in the countryside. The interpretation of isolated homes in the countryside has been clarified in the Court of Appeal judgment in Braintree DC v SSCLG [2018] EWCA Civ. 610. In this judgment, LJ Lindblom stated that when taken in its particular context within the policy “the word ‘isolated’ in the phrase ‘isolated homes in the countryside’ simply connotes a dwelling that is physically separate or remote from a settlement. Whether a proposed new dwelling that is, or is not, “isolated” in this sense will be a matter of fact and planning judgment for the decision-maker in the particular circumstances of the case in hand”.

- 6.23 Although the site lies beyond the nearest settlement confines the site is at the start of a cluster of built form, all of which are in residential use with exception to the subject site. Whilst dwellings are more sporadically positioned on the north side of Labour in Vain Road, there is a more obvious line of detached dwellings on the south side. The new dwelling would form part of this cluster. The site is not therefore isolated.

(e) the demolition of the existing building would not result in the loss of architectural or historic interest or a building that contributes to local character

- 6.24 The existing buildings that are to be demolished are not judged to be of any particular historic or architectural merit. Design features typical of residential developments within rural settings are to be replicated in the proposed dwelling.

- 6.25 Ultimately it is considered that the proposed redevelopment will not result in harm to the countryside and actually offers an improvement given the sporadic nature of the existing built form across the site and the removal of a significant amount of hard surfacing. It will offer a betterment in terms of the impact of any built form on the countryside.

(d) Design

- 6.26 In paragraph 40 of the National Design Guide, well-designed new development is defined as being such that responds positively to the features of the site itself, including the surrounding context beyond the site boundary. It needs to enhance positive qualities and improve on negative ones. This requires an understanding of the existing built development, including layout, form and scale, as well as landscape character.
- 6.27 Paragraph 49 of the National Design Guide adds that “local character makes places distinctive,” whilst paragraph 50 states that well-designed buildings: (i) have a positive and coherent identity that everyone can identify with, including residents and local communities; (ii) have a character that suits the context, its history; and (iii) are visually attractive, to delight their occupants and other users.
- 6.28 The dwelling is to comprise three bedrooms at the first floor, and will be finished using slate tiles, weatherboarding (black) with a brick plinth, plus aluminium window and door frames. It is considered that this choice of materials is entirely appropriate for this Green Belt location, whilst the low eaves height is reflective of the many barns that exist within the locality.
- 6.29 The issue of design needs to be judged against the design merits of the existing buildings, all of which are in a dilapidated, derelict state and would not be fit for purpose for the lawful use of the site, let alone the proposed use. This application therefore provides an opportunity to put this site back into a use that is not out of keeping with other buildings and uses that front this road, whilst the design is considered to offer a significant benefit compared with the existing.

(e) Parking and Highways Safety

- 6.30 Two off-street parking spaces are proposed, which should satisfy parking demands arising from a three-bedroom dwelling. Ample room exists for a visitor bay within part of the land in front of the vehicular access in advance of the highway. There is therefore no risk of a parking overspill on to the surrounding road network.
- 6.31 In respect of traffic generation, it is anticipated that there will be no material increase in traffic levels when taking into account the lawful use of the site and the proposed development. As such, there are no grounds to refuse this application relating to insufficient parking or highway safety.

(f) Living Conditions

- 6.32 The proposed dwelling is sufficiently separated and screened from any existing dwellings so as to ensure the living conditions of existing residents will not be materially harmed. Arguably the removal of the lawful builders yard that does not comprise of any restrictive conditions and its replacement with a single residential dwellinghouse will offer an improved standard of amenity for neighbours, in particular less noise and less mess.

- 6.33 The proposed new dwelling will provide for good sized family accommodation with three bedrooms on the first floor. Although not a requirement of the development plan, the rooms all comply with the NDSS and each property is M4(2) compliant.

(g) Contamination

- 6.34 The application is also supported by a Phase 1 Geo Environmental Desk Study and Preliminary Risk Assessment prepared by R Carr Geo Technical Services in August 2020. This provides a review of the history of the site and surrounding area together with an environmental risk-check and Preliminary Risk Assessment.
- 6.35 The Report concludes that, based on the information currently available, the site is considered to pose a low to moderate risk to human health, plant life and ground water. The Report therefore recommends that a limited intrusive investigation comprising shallow boreholes or trial pits is undertaken in order to ascertain whether contamination exists on the site. Samples of soil obtained from the excavations should be tested for a suite of common contaminants. Areas of proposed garden should be particularly targeted by the investigations. Any asbestos-containing material discovered within the fabric of any existing buildings should be dismantled by an experienced and licensed contractor. The submission of the additional site investigation report can be required by condition.

7.0 CONCLUSIONS

- 7.1 The proposed built form will be reflective of that in existence, whilst the layout shows a more consolidated form of development. The proposed use, in consideration of the lawful use, will also not result in any material harm to the openness of the Green Belt and the purposes of including land within the Green Belt.
- 7.2 TMBC do not have a five-year housing land supply. With there being no *clear* reason to refuse the development based on harm to the Green Belt, the proposal meets the test set out in part (i) of paragraph 11(d) of the Framework. Furthermore, the adverse impacts of granting permission would not significantly or demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole; indeed, it is concluded that it is rather the reverse, hence, the proposal meets the test in part (ii) of paragraph 11(d). In such circumstances, the presumption in favour of sustainable development applies to this proposal.
- 7.3 As such, in accordance with paragraphs 11 and 38 of the Framework, and in consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority and it is respectfully requested that this submission is approved.