



Appeal Decision

Inquiry Held on 29 June – 2 July 2021 and 17 - 19 August 2021

Site visit made on 23 August 2021

by K Ford MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 21st September 2021

Appeal Ref: APP/Z2830/W/21/3269904

Land East of Lower Road, Milton Malsor, Northamptonshire

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Hollins Strategic Land LLP against the decision of South Northamptonshire District Council, now East Northamptonshire Council.
 - The application Ref S/2020/0599/MAO, dated 9 April 2020, was refused by notice dated 29 October 2020.
 - The development proposed is for the erection of up to 65 no. dwellings with associated works and access at Lower Lane.
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The description of development above was taken from the planning application. Whilst it refers to Lower Lane, the access would be located off Lower Road.
3. The planning application was made in outline with all matters reserved for future consideration except for that of access. A Parameters Plan showing indicative landscaping has been submitted for illustrative purposes. I have determined the appeal on this basis.
4. On 1 April 2021 South Northamptonshire Council ceased to exist and became part of West Northamptonshire Council. The administrative changes make no difference to my reasoning or the outcome of this appeal. Where appropriate, I refer to the former South Northamptonshire administrative area to reflect the way in which the evidence to the Inquiry was presented.

Main Issues

5. The Council confirmed prior to the start of the Inquiry that it no longer planned to defend its third reason for refusal regarding developer contributions towards community services and infrastructure. This was subject to the submission of a signed and executed S106 agreement prior to the end of the Inquiry. This was achieved and so therefore the main issues are:
 - Whether the scale and location of development would be acceptable for housing development, having regard to the spatial strategy in the development plan.

- The effect of the proposal on the character and appearance of the area.
- Whether the Council can demonstrate a 5 year housing land supply.

Reasons

Acceptability of Location

6. The West Northamptonshire Joint Core Strategy (JCS) covering what were the administrative areas of Daventry District Council, Northampton Borough Council and South Northamptonshire Council was adopted in 2014. The JCS identifies an area known as the Northampton Related Development Area (NRDA) to assist the Northampton Borough Council administrative area in meeting its housing needs. As part of this there is a clear spatial strategy to focus housing development in urban areas. This is to encourage sustainable development that minimises the need to travel for environmental and social benefits. Development in rural areas is limited to that required to meet local needs and support local services. There is a tiered approach to development with rural areas located at the bottom of a hierarchy.
7. The strategy of the Plan is reflected in Policy R1 of the JCS. For the rural area of South Northamptonshire, Policy R1 identifies a need for 2,360 dwellings 2011-2029. It identifies that the distribution will be subject to the rural settlement hierarchy of the South Northamptonshire Part 2 Local Plan (LPP2) and that development, amongst other things is required to be within the existing confines of the village. Development outside of existing confines would only be permitted in certain circumstances. Similarly, once the housing requirement for the rural areas has been met further development is only permitted where certain criteria are achieved.
8. Milton Malsor is located in the rural area and the appeal site is outside the settlement confines of the village. Furthermore, it does not meet any of the exceptions identified within the provisions of Policy R1 of the JCS. As the housing requirement for the rural areas has been met, the appellant accepts that the scheme does not accord with Policy R1 of the JCS.
9. There is dispute between the parties as to whether the scheme would conflict with Policy S1 of the JCS. Policy S1 states new development will be concentrated primarily in and adjoining the principal urban area of Northampton (including the NRDA) followed by Daventry and then the rural service centres of Towcester and Brackley with limited development in rural areas. The supporting text confirms that development in the rural areas is limited to providing for local needs and to support local services. This is consistent with Policy R1 of the JCS and so conflict with Policy R1 is also a conflict with Policy S1, irrespective of the absence of any housing numbers in Policy S1.
10. I do not consider that the provisions of Policy S1(a) of the JCS, or Policy LH1(2) of the LPP2 which allows development adjoining the NRDA to contribute towards the growth of the NRDA to undermine the strategy or be inconsistent with the Council's stance on the matter. This is because the circumstances where it would apply are clearly defined. The site may be some 350m from the NRDA and therefore closer than some settlements higher up the settlement hierarchy but this distance is as the crow flies. Proximity to Northampton formed part of the considerations in identifying Milton Malsor's position within

- the settlement hierarchy. The appeal site does not meet the criteria to be deemed development that would contribute to the NRDA.
11. With regards LPP2, Policy SS1 identifies that new development will be directed to the most sustainable locations in accordance with their scale, role and function unless otherwise indicated in the Local Plan. Areas outside development confines are classified as open countryside and housing development outside settlement confines is only supported where it would comply with identified policies or is development related to the NRDA.
 12. Milton Malsor is a secondary village (b) settlement in the LPP2. As such it is third in the settlement hierarchy overall but within the secondary village category it is lower than settlements categorised secondary village (a) which are considered likely to be more suitable for limited development. As the site is located outside the settlement confines it is located within open countryside in policy terms. The scheme would not comply with any of the scenarios in which development outside of the settlement confines would be acceptable. The proposal would therefore conflict with the relevant parts of Policy SS1 of LPP2. Similarly, Policy LH1 of LPP2 says development outside settlement boundaries will not be acceptable unless it complies with certain exceptions. None of them apply to the appeal site.
 13. As a secondary village (b) Milton Malsor is at the lower end of the settlement hierarchy. This is reflected by the limited number of services and facilities I witnessed on my site visit. Within walking distance of the site there is a small convenience store, pub, primary school, 2 churches, village hall, park and playing fields. I accept that there would be a range of day to day facilities as identified in an appeal cited by the appellant in support of their case¹. However, for the size of development proposed there are a number of notable exceptions that would not fully meet day to day needs such as a nursery, secondary school, post office and GP surgery.
 14. During the Inquiry much was made by the appellant of the new Northampton Gateway Strategic Rail Freight Interchange site (SRFI) which will generate a significant number of jobs within walking distance of the site. The site may provide job opportunities for the local workforce but it is by no means guaranteed that they would be the occupants of the proposed scheme. There is nothing that would specifically tie the 2 developments together to ensure this.
 15. The proximity of Milton Malsor to employment opportunities is already recognised in the settlement's position within the settlement hierarchy. There is little to indicate that the presence of the SRFI would do anything to address the shortcomings of the services and facilities which generated the settlement's position in the settlement hierarchy and therefore make the location more sustainable. There is therefore little to indicate that the SRFI would necessarily alter the role or function of Milton Malsor.
 16. I note the proximity of bus stops to the site but consider their frequency, even following a return to pre-covid timetabling, would discourage some people from using the service, particularly as the service does not run late into the evening. Whilst I do not consider a 17 minute total travel time for secondary school pupils using the bus to be unreasonable, the fact that the bus does not take children directly to the school may also dissuade patronage.

¹ APP/Z2830/W/20/3264294

17. I do not consider it to be an acceptable route for school children to cycle. The route may be flat but the cycle lane does not run the full length of Towcester Road. The road has a 60mph speed limit and so vehicles will be travelling at speed and the road is unlit. The presence of a footpath may create a character where vehicular and non-vehicular traffic can be expected, as suggested by the appellant. However, I am not convinced that the conditions would moderate motorist behaviour to the extent that either pedestrians or cyclists would feel particularly safe travelling along the route, especially at night. The fact that there are dedicated cycle facilities closer to Northampton providing some expectation of cycle usage does not alter my view. I consider that a significant proportion of inhabitants would choose to travel by car. The appellant says that car ownership in Milton Malsor is lower than elsewhere in South Northamptonshire but no substantive evidence was presented on the reasons for this which limits the weight I attach to it.
18. Irrespective of whether the scheme would constitute major development in planning terms, the scale of the development would be large in the context of Milton Malsor and would not be limited, as proposed by the appellant. The development would be a significant addition to the edge of the settlement in the context of the size of the village and the scale of services and facilities serving it.
19. The appellant says the development would only constitute 2.75% of the requirement for the rural areas and therefore would not prejudice the urban focused strategy. This does not make the development acceptable. Similarly, my view is not altered by the planned SRFI which I do not consider to be part of the settlement. It is a standalone scheme, detached from the settlement edge, unlike the proposal.
20. In summary, there is agreement between the parties that the location of the site outside of the settlement confines and the absence of compliance with any of the identified exceptions means that there is conflict with the development plan strategy and the strategy that underpins it. The proposal would conflict with Policies R1 and S1 of the JCS and Policies SS1 and LH1 of LPP2.

Character and Appearance

21. The approximately 5.1ha rectilinear appeal site is located on the edge of Milton Malsor, off Lower Road. Largely featureless, the site rises slightly above Lower Road due to its gently sloping topography. Opposite the site and separated by Lower Road is residential development. To the south the site abuts the rear gardens of residential properties on Stockwell Road. The eastern boundary is marked by a railway line beyond which are agricultural fields and to the north there are also fields. The absence of development on the site means that it shares the characteristics of the fields to the north and east beyond the railway line rather than the built form of the settlement to the south and west. The openness of the site and the land beyond it to the north and east means that I do not share the view of the appellant that the site is characterised by a sense of containment.
22. Residential development may be visible in some views of the site but it is distinct from it rather than part of it. Much of the urbanising features along Lower Road are contained to the side of the road where there is built development. The location of the site adjacent to the main road into the settlement and close to the crossroads between Lower Road, Stockwell Road

- and High Street means it is prominent in views into and out of the settlement even if those views are not long distance.
23. The site is notable in marking the transition between the built form of the settlement and countryside beyond, forming part of the countryside setting of Milton Malsor. It is therefore significant in a local context. Indeed, the Inspector found the settlement confines defined in LPP2 to be grounded on a clear and compelling rationale and are therefore justified.
 24. The site lies outside Milton Malsor Conservation Area. There has been no suggestion that the development would harm the setting of the Conservation Area or its heritage significance. From my observations on site I have no reason to take a different view given the distance of the site from the Conservation Area boundary.
 25. In the Current Landscape Character Assessment (LCA) the site falls within Landscape Character 13: Undulating Hills and Valleys and more specifically LCT13b: Bugbrook and Daventry. The site does not demonstrate all of the features of the LCA type but nevertheless is part of, and contributes to an extensive wider undulating and productive landscape which has mixed farming characteristics where there is a predominance of improved pastures surrounding settlements. In this case the site is adjacent to the clustered settlement of Milton Malsor.
 26. The current landscape value of the site may not be considered important at a district level or above. However, it still makes a contribution to the rural character of the village and as such has some significance in a local context irrespective of it not being designated as a valued landscape. The site is not identified in the Conservation Area Appraisal and therefore not considered to be of special architectural or historic interest in the same way as green spaces in Collingtree Road and Rectory Road. This does not mean it has no significance in a local context.
 27. It is common ground between the parties that the proposed development would cause landscape and visual harm. However, there is dispute regarding the extent of the harm.
 28. Whilst I acknowledge that the site has medium sensitivity given its location, features and surroundings, I disagree with the findings of the Landscape Visual Impact Assessment (LVIA) that the impact on landscape character would be slight 15 years after the development. I do not consider that the scheme would lead to little change in the key characteristics of the landscape character, as suggested by the LVIA.
 29. The scheme would lead to housing development in what is currently open countryside, extending the built form in Milton Malsor in a north east direction. The development would have an urbanising effect from the built form, supporting infrastructure and associated domestic paraphernalia. Restricting building heights to match existing dwellings on Stockwell Road and Lower Road and not extending the building line beyond Stockwell Road to the east would do little to minimise the impact.
 30. Similarly, the proposed landscaping and open space would only go some way to mitigating the impact. Over 50% of the site may be dedicated to green space but there would still be a net loss of open space and the character of the

existing site would be harmed as a result. Reference was made to an increase of trees on the site of around 65%. Whilst this and the proposed hedgerow planting would soften the edge of the settlement this could be achieved irrespective of development. In any event, the existing boundary made of gardens, fencing and mature trees of properties on Stockwell Road are clear and defensible.

31. The visual effects of the scheme cannot be considered minor, even after allowing time for the vegetation to mature. Views from along the length of Lower Road would be prominent, even if localised given the size and scale of the development in that locality. The full breath of the scheme would be visible in viewpoints on Lower Road. I am of the view that the impact on the landscape character and appearance would be moderate as a consequence.
32. Irrespective of the differing opinions and dispute between the parties regarding what was said in cross examination, based on the evidence before me and my observations on my site visit, I am of the view that the scheme would harm the character and appearance of the area. It would therefore conflict with Policy R1 of the JCS which among other things requires residential development in rural areas to not affect open land that is of particular significance to the form and character of the village. It would also conflict with Policy SS2 of the LPP2 which requires new development to maintain the individual identity of villages and their distinct parts and does not result in the unacceptable loss of undeveloped land and locally important views of particular significance to the form and character of a settlement. There would also be conflict with the National Planning Policy Framework (NPPF) which recognises the intrinsic character and beauty of the countryside and seeks to ensure development contributes to and enhances the natural environment.

5 Year Housing Land Supply

33. The JCS covers the former 3 administrative areas of Northampton, Daventry and South Northamptonshire. It sets out a scale and distribution of housing development across the 3 areas, including an area identified as the NRDA. The NRDA covers all of Northampton Borough Council area and part of Daventry District Council and South Northamptonshire Council areas.
34. The JCS takes a plan area approach which underpins the strategy. It directs development to the most sustainable location of Northampton, supported by Daventry, Towcester and Brackley in their role as rural service centres. Development in rural areas is limited to providing for local needs and supporting local services. The same strategy is adopted in the LPP2 which covers the previous administrative area of South Northamptonshire, including that within the NRDA.
35. The NRDA is monitored separately to South Northamptonshire with housing land supply falling notably short of the 5 year housing land supply requirement at 2.75 years. The Council claim a housing land supply of 6.32 years within the South Northamptonshire area, excluding the NRDA. The appellant disputes this figure and the way the Council has calculated the 5 year housing land supply, suggesting that there is a 2.31-2.32 year housing land supply.

Requirement

36. The JCS was adopted in 2014 and therefore is more than 5 years old. However, a review has been undertaken of the policies in accordance with paragraph 33 of the NPPF. The review identified that Policies S1, S3, S4 and S6 were up to date and that in the interim, whilst a review of the JCS takes place, the figures in S3 should continue to be used for the purpose of calculating the 5 year housing supply rather than the LHN figure which would otherwise be required under the provisions of the NPPF. This is because the residual housing requirement in the JCS was higher than the LHN figure and therefore aligns with the NPPF objective of boosting housing supply. The JCS requires updating to extend its timescale, to plan for more growth during that extended timeframe and to address under delivery in the NRDA. In the interim though Policy S3 is deemed fit for purpose.
37. Taking a plan area approach the Council is of the view that the South Northamptonshire figure should exclude the NRDA. The appellant disagrees stating that there is nothing in the JCS to indicate that this is the approach that should be taken. There is nothing that 'sets out' a figure of 7,170 and so they argue that to be consistent with paragraph 74 of the NPPF a figure of 11,020 should be used which is based on administrative boundaries. I disagree.
38. The JCS sets out a clear spatial strategy for development. Reading the Plan as a whole, it is evident that Policies S3 and S4 set a requirement with reference to plan areas. As such the requirement for South Northamptonshire excluding the NRDA is 7,170 comprising Brackley 2,160, Towcester 2,650 and the rural areas 2,360. The appellant says the Policy review did not contemplate the 7,170 figure. However, the review was done in the context of an under delivery in the NRDA and this did not change the outcome.
39. The Plan has a clear spatial strategy for development that is set out in the strategic policies. There is nothing in paragraph 74 of the NPPF that requires use of a single administrative area in calculating the housing land supply. The NPPF encourages cross boundary working and co-operation and the JCS seeks specifically to address housing delivery in Northampton through the NRDA. The JCS Inspector identified that 'it is considered desirable and acceptable in principle that the NRDA is taken as one joint area for the assessment of new housing delivery'. There has been no change in the way housing land supply is calculated since the JCS was adopted. In the intervening period whilst a review of the JCS is undertaken the approach has been deemed fit for purpose.
40. The appellant says the Council's case is undermined by the fact that the housing delivery test (HDT) cannot be assessed on a plan area basis. However, the HDT is distinct from the calculation for housing land supply with the housing delivery test looking backwards and housing land supply looking forward. I therefore give this argument little weight. In any event, it was agreed between the parties that all 3 Councils which now comprise West Northamptonshire passed the Housing Delivery Test and so a 5% buffer is applied.
41. My attention has been drawn to a number of appeal decisions, one of which takes a different stance to the one I have taken on whether the NRDA should be included. In the Rothersthorpe case² there is little detailed discussion on the

² APP/Z2830/W/18/3206346

matter. Whilst I agree that brevity does not undermine quality I have little evidence to enable direct comparisons between that case and the one before me, and little to substantiate the appellant's claim that the evidence presented at Rothersthorpe was consistent with the evidence in this case. Irrespective of the consistency of my findings with other appeals, as things stand I am of the view that the NRDA should not be included in the requirement figure based on the evidence before me.

Stepped v Annualised Approach

42. In line with the Middleton Cheney appeals³ the Council say in this case the delivery figures in Policy S3 should be used to calculate the housing requirement. In doing so the Council argue that an annualised rather than a stepped approach should be used in the housing trajectory.
43. The Council say there is no policy support for using a stepped trajectory in the case of South Northamptonshire. However, my reading of the JCS does not support this. The JCS adopts a stepped trajectory and this is illustrated in appendix 3 of the Plan. I see no compelling reason why the 5 year supply should not be measured against that trajectory. The Council say that the delivery trajectory is very steep in places. Nevertheless, this was considered deliverable and therefore found sound at examination and so is not a reason to take a different approach in calculating the 5 year housing land supply.
44. In any event, as identified in the Housing Land Supply Statement of Common Ground, an excess of 5 year housing land supply exists whether a stepped or annualised approach is taken to the delivery figures where the 5 year requirement is calculated on the basis of the plan area approach excluding the NRDA.

Oversupply

45. The Council identify that in South Northamptonshire, excluding the NRDA, there has been an oversupply against the trajectory. Under the annualised approach this leads to a reduction from the requirement of 438 dwellings. Using the trajectory approach it equates to 401 dwellings. The Council has dealt with oversupply by applying it equally over the remaining plan period. There is little before me to indicate it should be dealt with differently.

Conclusion on 5 year Housing Land Requirement

46. I conclude for the reasons identified above that the figure for the 5 year housing land requirement should be derived from the JCS of 7,173. The 5 year requirement of 2,140 for the period 1 April 2021 - 31 March 2026 should be adjusted by an oversupply of 401 and a buffer of 5% generating a final figure of 1,739 dwellings.

Housing Land Supply

47. There is dispute between the parties regarding the supply figures associated with sites that make up the 5 year housing land supply. However, all the sites in dispute fall within the NRDA. As I have concluded that the NRDA should not be included in the considerations of this appeal I have not considered the supply issues raised in relation to the sites.

³ APP/Z2830/W/20/3261483 and APP/Z2830/W/20/3259839

Windfall Allowance

48. Paragraph 71 of the NPPF enables windfalls to be included as part of the anticipated supply where there is compelling evidence that they will provide a reliable source of supply. The NPPF requires that any allowance to be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
49. The Council take a robust approach focused on existing commitments in years one and 2 and a net windfall allowance of 212 for years 3, 4 and 5. In the context of past trends the allowance is not over exaggerated. There is little in terms of reasoning to corroborate the simplified alternative approach adopted by the appellant.
50. Overall, I am satisfied that the windfall allowance proposed by the Council is justified through the evidence of historical delivery rates and there is little to substantiate any divergence from the evidence on future delivery trends.

Conclusion on 5 year Housing Land Supply

51. When adding the housing supply figure to the Council's suggested windfall allocation this generates a supply figure of 2,062. Based on a requirement of 1,739 this creates a housing land supply figure of 5.65 years. Accordingly paragraph 11(d) of the NPPF is not engaged.

Other Matters

52. The submitted S106 agreement covers a number of planning obligations that are required by Policies RC2, INF1, INF2, S10, C5 and R3 of the JCS and Policies SPD2, GS1, LH8, INF1 and SS2 of the LPP2 to ensure the facilities and services that are essential for development to take place or to mitigate the impact of development.
53. The S106 would secure 50% affordable housing on site in line with adopted policy. Onsite open space would be secured as part of the development and there would also be a financial contribution towards outdoor sport in the vicinity of the site. The financial contribution towards the No 88 bus service and provision of travel card to each dwelling would contribute towards the retention and/ or enhancement of the existing bus service depending on provision at the time the contribution is payable.
54. The financial contribution for refuse bins to ensure provision to each new dwelling and the financial contribution towards libraries is to address additional demand for the service by residents of the development. The financial contribution towards NHS primary healthcare is to address the need for additional healthcare services as a result of the development. The monitoring fee is to fund the cost of monitoring compliance and associated administrative tasks generated by the agreement.
55. Given the policy requirements and infrastructure needs arising from the development I am satisfied that all of the above obligations are necessary to make the development acceptable in planning terms, are directly related to the development and fairly and reasonably related in scale and kind to the development. They would accord with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). Consequently, I can take all of the S106 obligations into account as part of my decision.

Planning Balance

56. I have found that the Council can demonstrate a 5 year housing land supply. I also consider that the proposal would conflict with Policies R1 and S1 of the JCS and Policies SS1, LH1 and SS2 of the LPP2 which bring the scheme into conflict with the development plan as a whole. The appeal should be determined in accordance with the development plan unless material considerations indicate otherwise.
57. The proposal would deliver 33 affordable homes. It is agreed between the parties that the most up to date Housing Needs Survey, dated 2011 is out of date. Whilst the appellant has attempted to provide a more up to date assessment it is not a local housing needs survey. The weight attached to the evidence is reduced by the absence of primary data and the age of the secondary data it relies upon. The indicative model used by the appellant is also not based on local data.
58. The most up to date credible evidence for the purpose of considering the proposal is that provided by the Council's Housing Officer, accepting the fact that the housing register from which the evidence is taken does not reflect all tenures. The evidence identifies 34 people in affordable housing need willing to live in Milton Malsor, 3 of which have a local connection.
59. Factoring in the limitations of the evidence before me, but mindful of the shortfall in the delivery of affordable housing across South Northamptonshire, I give the provision of affordable housing significant weight in the planning balance.
60. I have found that the Council can demonstrate a 5 year housing land supply but am mindful that this does not mean a cap on development. Whilst reference has been made to the appreciable weight given to the delivery of market housing in the Middleton Cheney appeals referred to by the appellant, I consider the circumstances to be different in the case before me. This is because Middleton Cheney sits higher in the settlement hierarchy as a primary service village. For the reasons identified above I do not place as much weight as the appellant on the SRFI as a very significant site specific consideration. Overall, I give the delivery of market housing through the scheme moderate weight in the planning balance.
61. There would be economic benefits during construction and afterwards from spend by occupants within the local economy. There would also be the potential for additional patronage at the local primary school. However, as the specific benefits have not been quantified the weight given to this is limited.
62. The appellant cites off site highway improvements at the junction of Towcester Road and Lower Road as a benefit of the scheme, giving it significant weight. However, I give this moderate weight given there is little substantive evidence to indicate that it would go beyond mitigating the impacts of the scheme. Whilst the appellant says for example that it will reduce traffic speeds on Lower Road there is no evidence to suggest that this is currently an issue.
63. The development would generate biodiversity gain of around 25.5% through increased landscaping on the site. I give this moderate weight. I also give moderate weight to the increase the provision of public open space by around 2.6ha based on the indicative layout.

64. I am of the view that the benefits outlined are not sufficient in this case to outweigh the harm I have identified and the conflict with the development plan.

Conclusion

65. For the reasons identified I conclude that the appeal should be dismissed.

K Ford

INSPECTOR

Richborough Estates

Appearances

For the Appellant

Ms Sarah Reid of Counsel, instructed by Hollins Strategic Land LLP

She called:

Mr Nigel Evers

Mr Stephen Harris BSc (Hons) MRTPI

For the Council

Ms Isabella Tafur of Counsel, instructed by West Northamptonshire Council

She called:

Mr Jon Goodall MA (Cantab) MSc MRTPI

Mr Andrew Murphy BA (Hons) MSc MRTPI

Interested persons who spoke at the Inquiry:

Cllr Ann Addison

Cllr Stephen Clark

Cllr Paul Heath

Inquiry Documents

INQ1 Opening statement on behalf of the Appellant

INQ2 Open statement on behalf of West Northamptonshire Council

INQ3 Statement by Cllr Ann Addison

INQ4 Statement by Cllr Paul Heath

INQ5 Statement by Cllr Stephen Clarke

INQ6 Appeal Decision 3256072 CD6.16

INQ7 Agreed final S106 agreement

INQ8 Amendment to Table 7.6 Mr Harris proof of evidence