

STATEMENT OF COMMON GROUND

LAND SOUTH OF LONGSIGHT ROAD,
LANGHO

MARCH 2026

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1. Introduction

- 1.1 This Planning Statement of Common Ground ('SoCG') has been prepared jointly by Hallam Land Management ('the Appellant') and Ribble Valley Borough Council ('the Council').
- 1.2 The statement sets out the matters that have been agreed, as well as those that are in dispute between the two parties in respect of the ongoing appeal in relation to the Council's refusal of planning permission.
- 1.3 The statement is structured as follows:
 - i) A description of the site, surrounding area and background to the appeal application
 - ii) The proposed development
 - iii) Relevant planning policy and guidance
 - iv) Areas of agreement
 - v) Areas of disagreement

2. Matters of Fact

Appeal Site and Surroundings

- 2.1 The site measures 20.01 hectares and is located directly south of Longsight Road (A59) adjacent to the village of Langho, 2.99km south-west of Whalley, 6.8km south-west of Clitheroe, 6.5 km north-east of Blackburn town centre and 16.7km east of Preston city centre.
- 2.2 The site is bound:
- To the north by Longsight Road (A59);
 - To the east by residential properties on 'Northcote Park', developed by Pringle Homes accommodating 42 dwellings (application reference: 3/2018/0844);
 - To the south by the railway line and Langho Railway station bounding the site at the south easternly corner; and
 - To the west by Whitehalgh Lane.
- 2.3 The proposed appeal boundary is set out below in Figure 1.



Figure 1: Appeal Site Boundary

- 2.4 The site is currently undeveloped greenfield land partially used for livestock grazing. The topography of the site slopes down from the southern boundary at the railway line (approx. 95m), down towards Longsight Road to the north (approx. 80m). An underground Utilities pipeline runs parallel to the railway line towards the south of the site.
- 2.5 A Public Right of Way ('PRoW') footpath (3-6-FP 6) runs across the site, connecting the A59 to Langho station and underneath the railway at Olive Bank, to Langho village conurbation.

- 2.6 An existing ditch and brook crosses the centre of the site, with an existing culvert towards Longsight Road. The land includes an ancient woodland, Green Nook Wood, located to the northeast of the site and covering approximately 2.69 acres. Other trees are present on site,
- 2.7 The Borough is largely rural, with the site accessed from the A59 corridor which runs through the Ribble Valley Borough from Samlesbury to Gisburn. Surrounding land uses to the Site comprise agricultural land to the north (beyond the A59, Longsight Road) and west (beyond Whitehalgh Lane and its sporadic development), a residential estate of 42 homes to the east (referenced above), and the existing Langho village settlement to the south, beyond the railway. The site is approximately 3 miles from the nearest point of the 'Forest of Bowland Area of Outstanding Natural Beauty'¹ ('AONB') at Hurst Green.
- 2.8 The development at Northcote Park is now complete, and the homes are occupied. The homes are characterised by detached and semi-detached 4, 5 and 6 bedroom homes.
- 2.9 More widely, the local vernacular in the Langho village settlement is characterised by a combination of smaller stone and red-brick properties with tiled roofs. The area features a predominantly residential urban form, characterised by a mix of detached and semi-detached bungalows and two-storey houses from the C20th.
- 2.10 The existing Public Right of Way ('PRoW') running through the site provides a pedestrian route via the underpass to Olive Bank. There is a PRoW (3-6-FP 49) at the western edge of the site on Whitehalgh Lane which provides connections to the south. There is car parking at the station albeit no dedicated car park.

Planning History

The Site

- 2.11 There are no previous applications for this site.

Surrounding Applications

Land off Longsight Road, Langho – Northcote Park

LPA Reference	Description of Development	Status
3/2018/0844	Erection of 42 new homes, landscaping and associated works.	Approved Subject to Legal Agreement (05/06/2019)
3/2015/0010	Application for outline consent for 18 residential homes, including 5 affordable homes and associated access, landscaping and other necessary works.	Approved Subject to Legal Agreement (09/07/2015)
3/2014/0687	Outline Application for up to 132 residential homes and associated access, landscaping and other necessary works.	Refused (14/11/2014)

¹ The term AONB has since been replaced by the term National Landscapes.

Land Adjacent to Ferns, Northcote Road Langho – Allocated site

LPA Reference	Description of Development	Status
3/2022/0537	Proposed residential development of 8 detached home houses.	Approved with conditions (28/04/2023)

Land at Petre Wood Close, Langho

LPA Reference	Description of Development	Status
3/2019/0661	31 affordable two and three-bedroom houses and two-bedroom bungalows (for rent and for shared ownership).	Approved with conditions (1st November 2019)

3. The Appeal Application

- 3.1 The OPA submission was submitted via the Planning Portal and received by RVBC on 10th March 2025 and registered by RVBC on 31st March 2025 under reference: 3/2025/0196. The description of development at the time of application was:

"Outline Application: Development of residential homes (Use Class C3), associated access, public rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access to, but not within, the site)".

- 3.2 This description was amended by the LPA and the application validated and processed on the basis of the following description:

"Outline planning application for up to 300 residential dwellings, associated access, rail station car park, green infrastructure and sustainable drainage systems (all matters reserved except for access)."

- 3.3 It is proposed that the maximum number of homes determined with the appeal is fixed via planning condition. Parameter plans accompany the application and are proposed to be approved plans to govern specific development constraints and how they inform the future layout of a proposed development which would be subject of reserved matters planning application(s). Detailed access plans have also been submitted for approval.
- 3.4 Parameter plan **ref 0102 'Land Use and Heights'** identifies the developable areas and the maximum building heights within those areas as well as approximately 10.84ha areas which are to be retained for green infrastructure comprising ecological enhancement areas, open space/amenity, proposed car park provision and attenuation ponds.
- 3.5 Parameter plan **ref 0103 'Movement and Access'** overlays the internal road, formalised pedestrian and cycle path network as well as proposals to retain the PRow between the train station and Longsight Road with a diversion at the northern end around one of the proposed attenuation basins.
- 3.6 An illustrative layout has been submitted with the planning application for information only and is not subject of approval at this stage however identifies one possible iteration of how relevant parameters and anticipated design requirements could inform a future layout.
- 3.7 Affordable housing would also be provided in-line with the requirement of 30% on site delivery (of affordable homes) in developments of 5 homes or more found in Key Statement H3 (Affordable Housing) and Policy DMH1 (Affordable Housing Criteria). The affordable housing mix will be guided through discussions with RVBC's housing team to reflect up-to-date needs in Langho and Ribble Valley more generally and will be secured via a legal agreement.
- 3.8 Key Statement H3 (Affordable Housing) also identifies the requirement for housing for older people. Accordingly, the proposal fully complies with the policy requirements for 15% of the units being delivered for older persons, of which 50% are for affordable housing and will be secured via legal agreement.

- 3.9 The proposal includes a new priority-controlled junction on Longsight Road to serve the development. This will be accompanied by an additional pedestrian and cycle access point from Whitehalgh Lane (with detailed permission for this element to be sought at this stage).
- 3.10 The outline proposals incorporate a publicly accessible surface level car park in close proximity to Langho station. Based on the Illustrative Masterplan, this will provide approximately 43 car parking spaces including 5 accessible bays, and parking for bicycles (the minimum number expected to be controlled by condition).
- 3.11 Eastwood prepared the Flood Risk Assessment and Drainage Strategy proposing flood risk mitigation measures including:
- Green Corridors, such as along the existing beck; and
 - Two attenuation basins located towards the northern boundary of the site (leveraging the sloping trajectory) that will also improve biodiversity and act.
- 3.12 Surface water runoff will be managed and directed away from the residential properties and neighbouring development.
- 3.13 Consultation responses were received by the LPA from:
- United Utilities
 - Environment Agency
 - Natural England
 - Electricity Northwest
 - Environmental Health
 - Network Rail
 - Lead Local Flood Authority
 - LCC Archaeology
 - LCC Education
 - Northern Rail
 - LCC Highways
 - GMEU
- 3.14 Other than from GMEU, there were no objections received from these consultees. The statutory consultation period ran from 31st March 2025 to 21st April 2025.
- 3.15 The application was presented to Planning and Development Committee on 22nd June 2025 with 5 reasons for refusal as follows:
1. *The proposed development would result in a large-scale residential development, outside of a defined settlement, which fails to meet any of the exception criteria for allowing development in such location contrary to Key Statements DS1 and H2 and Policies DMG2 and DMH3 of the Ribble Valley Core Strategy.*

2. *The proposed development, by virtue of the quantum of development, would result in a large scale development in a rural location resulting in future users being reliant on a private motor vehicle contrary to Key Statement DM12 and Policies DMG1 and DMG3 of the Ribble Valley Core Strategy and the National Planning Policy Framework which supports sustainable patterns of development.*
3. *The proposed development, by virtue of its overall scale and footprint, would result in the introduction of an incongruous, unsympathetic, and discordant form of development, particularly when viewed from public vantage points along Longsight Road (A59) approaching the site from both the western and eastern directions, Public Footpath FP0606a which crosses the site and residential properties to the north of Langho village afforded direct views of the site. This would result in adverse, long term and permanent visual and landscape harm. The resultant impact fails to respond positively to the inherent visual and landscape character of the area contrary to Policies DMG1, DMG2, DME1 and DME2 of the Ribble Valley Core Strategy and the National Planning Policy Framework including paragraph 135.*
4. *The application fails to carry out appropriate assessments to fully assess the impacts of the development upon habitats within and adjacent to the site including whether appropriate protection and enhancement can be provided for protected species and their habitat. This is contrary to Key Statement EN4 and policy DME3 of the Ribble Valley Core Strategy and the National Planning Policy Framework.*
5. *The proposed development would result in the loss of existing habitat, hedgerow and watercourse units, with insufficient details being submitted to demonstrate an appropriate strategy for achieving the statutory requirement for Biodiversity Net Gain contrary to Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).*

3.16 The application was unanimously refused in accordance with the officer's recommendation.

Documents/Plans that the LPA Made Their Decision On

3.17 The following represent the suite of documentation and plans which were the basis upon which the LPA determined the planning application.

Report	Prepared by
Planning Statement (inc. Affordable Housing Statement)	NJL Consulting
Statement of Community Involvement	NJL Consulting
Design and Access Statement including the Design Quality Assessment	Stantec
Preliminary Ecological Assessment and Surveys	FPCR
Biodiversity Net Gain (BNG) Metric and Statement of Intent	FPCR
Air Quality Assessment	Air Quality Consultants
Preliminary Geoenvironmental Investigation	Lithos
Transport Assessment	Hydrock Fore
Framework Travel Plan	Hydrock Fore
Tree Survey	FPCR
Arboricultural Impact Assessment	FPCR
Landscape and Visual Impact Assessment	Pegasus

Noise Impact Assessment including Vibration Assessment	Hoare Lea
Desk Based Archaeological Assessment/ Heritage Assessment	Prospect Archaeology
Agricultural Land Classification	Patrick Stephenson Ltd
Flood Risk Assessment	Eastwood Consulting Engineers
Drainage Assessment	Eastwood Consulting Engineers

Plan	Reference	Purpose
Site Location Plan	333101612_MR_MP_DWG0100	For approval
Illustrative Masterplan	333101612_MR_MP_VW0101	For information
Landscape Masterplan	P24-2318_EN_07_A_01	For information
Parameter Plan – Movement and Access	333101612_MR_MP_AI0103	For Approval
Parameter Plan – Land Use and Heights	333101612_MR_MP_AI0102	For Approval
General Arrangement	4094 100-P-001	For Approval
Engineering Layout	4094 100-P-002	For Approval
Proposed Off-site Highway Works on Whitehalgh Lane and Whalley Road	4094 INFO-SK-001	For information
Swept Path Analysis	4094 100-P-003	For approval

Proposed Amendment to Appeal Application

3.18 Subsequent to the scheme being determined, the Appellant has proposed some very minor modifications to the green infrastructure proposed as follows:

- The existing public footpath that runs through the site would pass through a proposed residential area. The configuration of the hard landscaping of this area, including access road and driveways, has been slightly adjusted to create a wider landscape corridor in order to accommodate the existing footpath alignment.
- The northern boundary of the site would accommodate a tree belt running along its northern boundaries leaving the balancing pond areas in broadly the same locations.
- Increased stand off between proposed development and designated Ancient Woodland

3.19 The changes affect the following informative plans:

Superseded Plan Reference	Updated Plan Reference
P24-2318_EN_07_A – Landscape Masterplan	P24-2318_EN_07_B – Landscape Masterplan
333101612_MR_MP_VW0101 – Illustrative Masterplan	333101612_MR_MP_VW0101 Rev F – Illustrative Masterplan

3.20 The changes do not result in any changes to parameter plans which are proposed to be conditioned should planning permission be granted. The changes do not change the extent of the appeal site, overall maximum number of dwellings proposed or substantially change the outline application.

3.21 There is no prejudicial or procedural unfairness to the Council, consultees or third parties and the appellant invites the Inspector to determine the appeal on this updated basis.

4. Planning Obligations and Suggested Planning Conditions

Planning Obligations

- 4.1 A S106 Agreement is being drafted between both parties, the agreed HoT's informing the drafting of the agreement are as follows:

Affordable Housing

- Provision of 30% on site provision (inclusive of percentage for affordable older persons housing)

Highways

- Travel Plan - £18,000
- £250 per dwelling contribution to support modal shift and to link to Travel Plan SMART targets
- Bus service contribution of £583.33 per dwelling per annum for 5 years

Car Park

- Construction, Delivery and Future Operation/Management

- 4.2 The following HoT matters are current not agreed between the parties:-

Healthcare

- A request has been made for a general practice contribution towards an extension of Whalley Medical Centre of £274.20 per person – precise amount to be calculated at reserved matters stage once unit numbers/sizes are known (formula to be added into s106 agreement). Request received from NHS Lancashire and South Cumbria Integrated Care Board dated 6th October 2025, shared with the Appellant on 14th January 2026. This cannot be agreed by the Appellant without the further justification that has been requested.

Leisure

- A request has been made for a contribution towards enhanced sport and leisure facilities in the Borough of £216.90 per person – precise amount to be calculated at reserved matters stage once unit numbers/sizes are known (formula to be added into s106 agreement). This contribution request was not received during the determination of the application. This cannot be agreed by the Appellant without the further justification that has been requested.

Suggested Planning Conditions

- 4.3 A list of suggested planning conditions will be contained in a separate SoCG.

5. Relevant Planning Policy, Guidance and Material Considerations

The Adopted Development Plan

5.1 For the purposes of this appeal the development plan comprises the following documents:

- Core Strategy 2008-2028 (adopted 2014); and
- Housing and Economic Development Plan (adopted 2019)

5.2 The following development plan policies as contained within the adopted Core Strategy are agreed to be relevant to the issues raised by the Appeal proposals:

Key Statement DS1: Development Strategy

Key Statement DS2: Sustainable Development

Key Statement EN3: Sustainability and Climate Change

Key Statement EN4: Biodiversity and Geodiversity

Key Statement H1: Housing Provision

Key Statement H2: Housing Balance

Key Statement H3: Affordable Housing

Key Statement DM1: Planning Obligations

Key Statement DM2: Transport Considerations

Policy DMG1: General Considerations

Policy DMG2: Strategic Considerations

Policy DMG3: Transport & Mobility

Policy DME1: Protecting Trees and Woodlands

Policy DME2 Landscape and Townscape Protection

Policy DME3: Site and Species Protection and Conservation

Policy DME6: Water Management

Policy DMH1: Affordable Housing Criteria

Policy DMH3 Dwellings in the Open Countryside and AONB

Policy DMB4: Open Space Provision

Policy DMB5: Footpaths and Bridleways

Evidence Base Documentation

5.3 A list of relevant evidence base documents will be agreed with the Council and listed within Core Documents.

National Planning Policy

- 5.4 The National Planning Policy Framework (NPPF) was first introduced in 2012 and was intended to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth. A revised Framework was published in December 2024. It is agreed that the following sections are most relevant to the determination of this appeal:

Section 2 - Achieving sustainable development

Section 3 – Plan-making

Section 4 – Decision-making

Section 5 – Delivering a sufficient supply of homes

Section 6 – Building a strong, competitive economy

Section 8 – Promoting healthy and safe communities

Section 9 – Promoting sustainable development

Section 11 – Making effective use of land

Section 12 – Achieving well-designed places

Section 15 – Conserving and enhancing the natural environment

- 5.5 The National Planning Practice Guidance (PPG) supports that NPPF with categorised advice in relation to specific matters and subjects.

Emerging Ribble Valley Local Plan

- 5.6 RVBC resolved to prepare a new Local Plan in November 2019. The emerging Local Plan is scheduled to undergo consultation in Spring 2026 on the Preferred Options Draft (Preferred Option) Local Plan consultation (Regulation 18).
- 5.7 The plan is therefore at an early stage of preparation and therefore is not afforded any weight in decision making.

Planning decisions / appeals / relevant case law

- 5.8 Planning decisions/appeals and judgements of relevance to the Appeal proposal in relation to the principle of development, housing land supply and any other technical detail to which evidence is being presented in relation this Appeal. This will include documentation pertaining to decisions within the Borough but also nationally.
- 5.9 A list of the most relevant decisions will be agreed with the Council and listed within Core Documents.

6. Matters Not in Dispute between the Appellant and the Council

5 Year Housing Land Position

- 6.1 As of December 2019, the housing requirement set out in adopted strategic policies of the Core Strategy were 5 years old and have not to date been reviewed.
- 6.2 The housing requirement is therefore now calculated using the Standard Method which increases the annual requirement to 311 dwellings p/a inclusive of a 5 % buffer the annual housing need is 327 dwellings p/a.
- 6.3 It is agreed that the Council cannot demonstrate a 5yhls and on this basis it is agreed that Paragraph 11d) of the National Planning Policy Framework and Key Statement DS2: Sustainable Development is engaged.
- 6.4 The Appellant and RVBC agree that: a separate SoCG will be prepared on this matter.

Assessment of Development Plan Policies

- 6.5 The Appeal application was refused planning permission due to the Council's opinion that there are of conflicts with Key Statements DS1 and H2, Policies DMG1, DMG2, DMG3, DMH3, DMI2, DME1, DME2, DME3 and EN4.
- 6.6 It is agreed that the Council are no longer contesting conflicts with Key Statements DS1, H2, DMG2 and DMH3 as a result of the Council's confirmed lack of 5 yhls in so far as their restrictive approach toward new development in the countryside.
- 6.7 It is agreed that the proposal comply with all other relevant development plan policies subject to the HoT matters being satisfactorily detailed in the legal agreement.
- 6.8 It is agreed that proposals do not need to comply with every single policy in the development plan to be considered acceptable overall in planning terms as confirmed by the Courts.
- 6.9 It is agreed that the evidence base underpinning the Core Strategy in respect of the housing requirement for Ribble Valley is out-of-date.

Location of Development

- 6.10 The Appeal site is not allocated within the development plan and is located outside of but immediately adjacent to the settlement boundary of Langho. It is therefore located within the open countryside as defined by Core Strategy Policy DMG2.
- 6.11 Langho is a Tier 1 Village as defined by Core Strategy Key Statement DS1: Development Strategy within the adopted development plan. This means it is one of the more sustainable defined settlements in the development plan.

Development in the Open Countryside

- 6.12 The Appellant and RVBC agree that the proposals are not a type of development deemed permissible in the open countryside by Policy DMG2 and DMH3. However, the parties agree that these policies are out of date for the purposes of this appeal in so far as their approach to restricting development outside of settlement boundaries and the Council are no longer contesting RFR1.

Impact on Spatial Strategy

- 6.13 The Appellant and RVBC agree that the purpose of a spatial strategy as set out within Policy DS1 is to guide development to the most sustainable locations. The policy seeks to direct a majority of development to Clitheroe, Whalley and Longridge.
- 6.14 The policy states that in addition to the strategic site of Standen and the borough's principal settlements, development will be focused on Tier 1 Villages. The policy does not provide a cap for development which can be directed to individual Tier 1 settlements such as Langho.
- 6.15 Policy DS1 formed part of RfR1 for refusing planning permission by the LPA but the Council are no longer contesting RFR1.

Impact on Landscape Character and Visual Amenity

- 6.16 The Appellant and RVBC agree that: a separate SoCG will be prepared on this matter.

Affordable Housing

- 6.17 The Appellant and RVBC agree that the Appeal proposals comply with Key Statement H3: Affordable Housing subject to the LPA being satisfied with the details of the affordable housing scheme proposed within a S106 Agreement.

Older Persons Housing

- 6.18 The Appellant and RVBC agree that the Appeal proposals comply with Key Statement H3: Affordable Housing in respect of Older Persons Housing subject to the LPA being satisfied with the details of the older persons scheme proposed within a S106 Agreement.

Open Space Provision

- 6.19 The Appellant and RVBC agree that:

- The Council's adopted policy does not prescribe specific standards to guide on site provision for individual developments. Policy DMB4: Open Space Provision requires that 'on all residential sites over 1 hectare, the layout will be expected to provide adequate and usable public open space. On a site-by-site basis, the council will also negotiate for provision on smaller sites, or seek to secure an off-site contribution towards provision for sport and recreational facilities or public open space within the area where the overall level of supply is inadequate. Any green infrastructure should be multi functional and encourage, where possible, walking and cycling opportunities.'
- The Appellant and RVBC agree that the illustrative masterplan demonstrates that adequate and usable Public Open Space could be provided for on-site within the development to satisfy the first part of Policy DMB4 set out above, however this is not a detailed matter for consideration in this outline application.
- The maintenance and management of the Public Open Space could be secured through a S106 Obligation.

Housing Balance

- 6.20 Policy H2 states that planning permission will only be granted for residential development providing it can be demonstrated that it delivers a suitable mix of housing that accords with the projected future household requirements and local need across the Ribble Valley as a whole as evidenced by the Strategic Housing Market Assessment. Determination of planning applications for residential development will be informed by the most recent Housing Needs Surveys, Addressing Housing Needs statement and the most recently adopted SHMA, to identify the type, tenure and size of residential dwellings, required at different locations throughout the borough as well as reference to relevant housing market information as appropriate.
- 6.21 Whilst the policy was cited in RFR1 at the time of refusing the planning application, the Appellant and RVBNC agree that there is no conflict with Policy H2 at this stage and this is not a matter in dispute.

Highways Safety

- 6.22 The Appellant and RVBC agree that LCC Highways are the key consultee on this matter. It is agreed from their response that:
- LCC Highways have raised no highways concerns in respect of the proposal and have provided a list of planning conditions to be attached to a planning permission in the event approval is granted
 - Traffic impact has been assessed with other known commitments and all assessed junctions operate within capacity without requirement for any mitigation
 - A Construction Traffic Management Plan requirement can be conditioned

Flood Risk and Drainage

- 6.23 The Appellant and RVBC agree that:
- The principles of the proposed drainage strategy are acceptable to the Council and consultees
 - The sequential test has been satisfied
 - The proposed development accords with Policy DME6

Ecology

- 6.24 The Appellant and RVBC agree that: a separate SoCG will be prepared on this matter.

Biodiversity

- 6.25 The Appellant and RVBC agree that: a separate SoCG will be prepared on this matter.

Air Quality/Noise and Lighting

- 6.26 The Appellant and RVBC agree that:
- There are no objections to the proposals on grounds of air quality
 - With regards noise and disturbance, subject to further detail for approval at the reserved matters stage the proposals can be controlled by appropriate conditions at the outline stage.
 - Lighting strategy can be addressed by appropriate conditions attached at outline stage subject to matters of ecology and Biodiversity being resolved.

Geoenvironmental conditions

- 6.27 The Appellant and RVBC agree that subject to further intrusive investigation to be conditioned, the proposal accords with Policy DMG1.

Agricultural land

- 6.28 The site is not classified as 'best and most versatile' land.

Benefits of Scheme

- 6.29 Both parties agree to updating their respective views on the full spectrum of benefits that are relevant within the planning balance and for consistency will utilise the following matrix in ascribing weight to be attached to each particular benefit:

Substantial
Significant
Moderate
Low
Limited/Negligible
None

7. Matters in Dispute between the Appellant and the Council

7.1 The matters that remain in dispute between the parties and therefore subject of evidence at the Inquiry are as follows:

Sustainable Development

7.2 The parties do not agree that the proposals represent sustainable development located in a sustainable location.

Conflict with Adopted Development Plan

7.3 The parties do not agree on the extent to which the Appeal proposals would conflict with the policies most important for their determination.

Scale of Development

7.4 The parties do not agree that the proposals represent an appropriate scale of development. The disagreement being in relation to

- Local landscape harm and ecological harm resultant from the scale of development in this location
- The appropriateness of the scale of development by virtue of the size of Langho as the settlement to which it relates and the services and facilities it offers, and the accessibility and connectivity to these services and facilities from future occupants of the development

Harm to Landscape Character and Visual Impact

7.5 The Appellant and RVBC do not agree on the extent of harm to local landscape character or on local or wider viewpoints and the alleged conflict with relevant development plan policies.

Ecology

7.6 The parties do not agree with the potential impact that the development would have on ecology, habitats, priority habitats and ancient woodland on the site and that appropriate BNG can be achieved which would mitigate the resultant harm.

Accessibility

7.7 The parties do not agree that there is a policy conflict with Policy DM11, DMG3 or para 117(b) of the NPPF

Housing Supply

7.8 The Appellant and RVBC do not agree on the Council's housing land supply position.

Infrastructure Requirements

7.9 The parties do not agree currently on the Heads of Terms in respect of health care and leisure contributions with the Appellant requesting further justification before agreeing to either request.

Benefits of Scheme

7.10 The Appellant and RVBC do not agree to the benefits of the scheme and on the weight to be attached to specific benefits resulting from the proposed development.

The Planning Balance

7.11 The Appellant and RVBC disagree on:

- The alleged fundamental conflict with development plan policy suggested by RVBC. The Appellant considers that the appeal proposals are in accordance with the adopted development plan as a whole.
- The alleged harm resulting from development and whether
 - the application of policies in the Framework that protect areas or assets of particular importance (footnote 7 of the Framework) provides a strong reason for refusing the development proposed; or
 - harm from the development would significantly and demonstrably outweigh the benefits of the of development when assessed against the policies in the NPPF when taken as a whole having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination
- Whether the appeal site and specific proposals respond positively due to the sustainability of the location and the accrued economic, social and environmental benefits.
- Whether, if it is determined that the appeal proposals do not accord with the development plan as a whole, there are material considerations which outweigh the alleged conflict with the Development Plan.

Signatories

Signed on behalf of the Appellant



Name: MARK SAUNDERS

Position: DIRECTOR – NJL CONSULTING

Date: 19th March 2026

Signed on behalf of the Council



Name: KATHRYN HUGHES

Position: PRINCIPAL PLANNING OFFICER

Date: 20th March 2026

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