

APPEAL

STATEMENT OF CASE

IN RELATION TO

**WREXHAM COUNCIL'S REFUSAL OF AN
OUTLINE PLANNING APPLICATION FOR
26 DWELLINGS (WITH ACCESS)**

AT

LAND OFF ELLESMERE LANE, PENLEY

(LPA REF: P/2015/0399)

ON BEHALF OF:

R & C HOMES

APPEAL STATEMENT OF CASE

APPLICANT'S DETAILS

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Appeal – Ellesmere Lane, Penley

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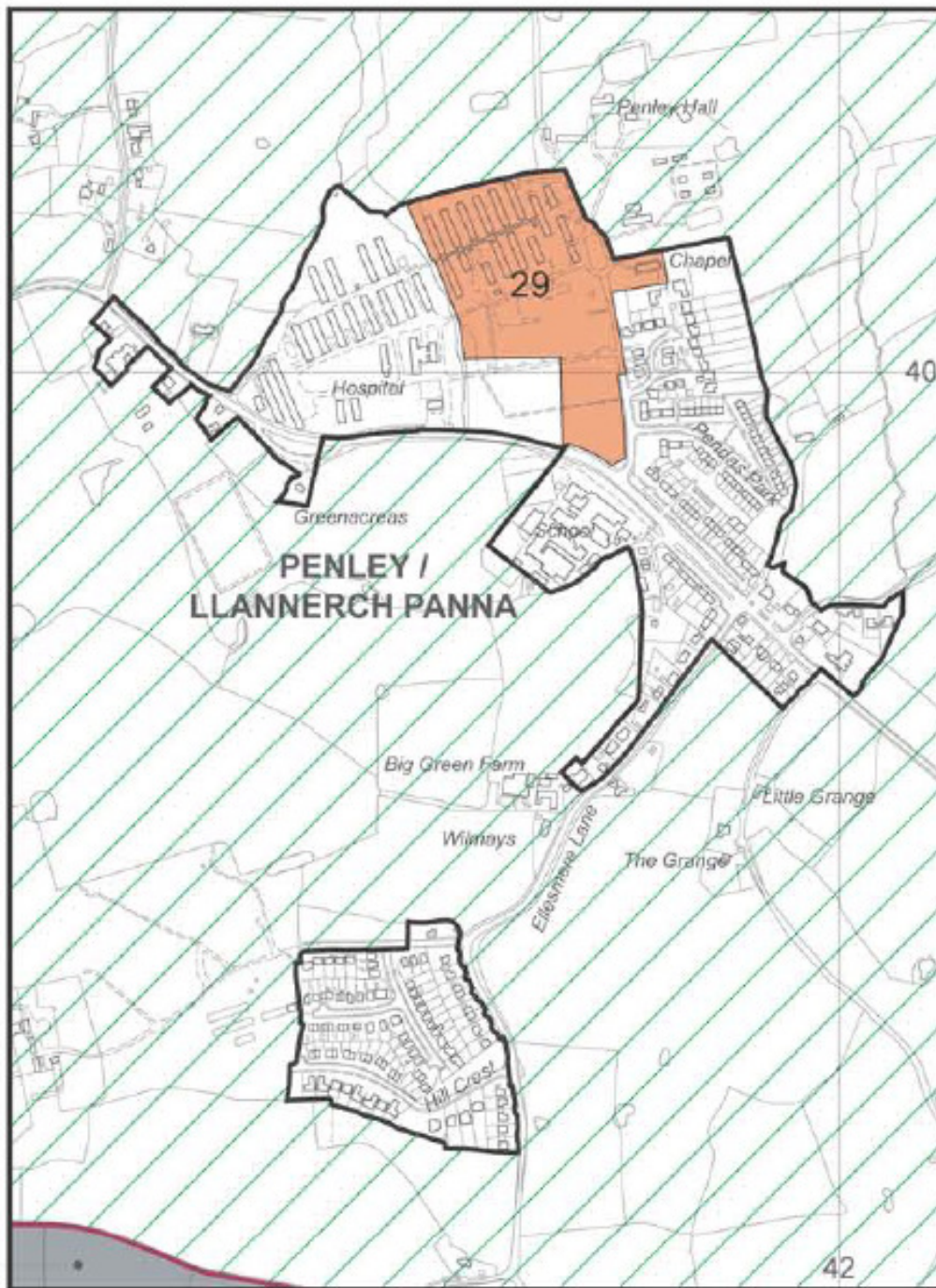
1.0 Introduction

- 1.1 This appeal relates to a proposed residential development of 26 dwellings on land off Ellesmere Lane, Penley.
- 1.2 The application subject of this appeal was received by the Local Planning Authority on the 27th May 2015 (reference P/2015/0399) and was subsequently refused on the 20th October 2015. In reaching the decision the Council referred to Wrexham Unitary Development Plan strategic policies PS1, PS2, PS3, PS4 and specific policies GDP1, H5, CLF5 and EC5.
- 1.3 The reasons for refusal are addressed in section 3.

2.0 Background

The appeal site and environs

- 2.1 The site lies between the two settlement limits identified for the village of Penley, as shown on map 1. As such it forms a natural link between the outlying housing estate and the rest of the village. This would be a natural direction of growth for the village, with the secondary school in the centre of the village.
- 2.2 All the land outside the settlement limit is designated as Special Landscape Area, shown hatched green on map 1. This designation covers extensive parts of the County Borough. Apart from the Special Landscape Area, the site is not affected by any other designations, as it has no specific heritage or natural environment features.



26. Penley / Llanerch Panna

Map 1: Extract from UDP Policies Map

Planning Application P/2014/0264

- 2.3 The appeal site formed part of the development site of a previous application for 68 dwellings (reference P/2014/0264), which was refused on 5th September 2014. However, the scheme submitted as planning application P/2015/0399 (subject of this appeal) is a significantly amended proposal to address the reasons for refusal of the earlier application.

Development Plan situation

- 2.4 The Wrexham Unitary Development Plan (UDP) covered the period 1996-2011. The UDP is therefore out of date and Planning Policy Wales makes clear that where development plan policies are considered to be outdated *“local planning authorities should give them **decreasing weight in favour of other material considerations** such as national planning policy, including the presumption in favour of sustainable development”* (emphasis added) (PPW paragraph 2.8.4). These other material considerations are addressed in section 3.4.
- 2.5 The replacement for the UDP, the Wrexham Local Development Plan 2 (LDP2), is still in the initial stages of its preparation and has yet to reach its Pre-Deposit Stage. The appellant submitted representations on the Vision, Objectives and Strategic Growth and Spatial Options during its consultation stage between 2nd March – 10th April 2015. The submission is attached as Appendix 1 of this statement, and supports the more dispersed spatial growth option of distributing housing growth around local service centres, as these settlements are sustainable places that can accommodate their share of the County Borough's growth over the next 15 years. In addition, this option better reflects market demand as to where people want to live, whilst spreading growth around the Borough will enable rural areas to thrive, addressing rural inequality and enabling more people to live where they can enjoy the Borough's quality "natural, built heritage and culture assets" as set out in the LDP's Vision.
- 2.6 Given the above, and the scale of this development proposal, it is evident that refusal on prematurity grounds is not appropriate. In this regard, Planning Policy Wales (paragraph 2.8.2) makes clear that *“a refusal on prematurity grounds will seldom be justified where a plan is at the pre-deposit plan preparation stage, with no early prospect of reaching deposit, because of the lengthy delay which this would impose in determining the future use of the land in question”*.
- 2.7 In addition, Welsh Government guidance contained within Technical Advice Note 1 “Joint Housing Land Availability Studies” identifies in section 8 that local planning authorities *“that do not have either an adopted LDP or UDP will be unable to demonstrate whether or not they have a 5-year housing land supply and effectively will be considered not to have a 5-year supply”*. Therefore, until the LDP2 is adopted, Wrexham is regarded as not having a 5-year land supply.

3.0 Statement of Case

Reason(s) for Refusal

- 3.1 Wrexham Council refused planning application P/2015/0399 on the 20/10/2015, stating the following reason(s):

1. By virtue of the proposed scale and location of this residential development of a greenfield site, outside of any settlement limit as defined in the Wrexham Unitary Development Plan, and within a Special Landscape Area, the development would be materially detrimental to the character of this countryside location and would represent an undesirable visual intrusion into the rural landscape and Special Landscape Area. The development would not maintain the existing settlement pattern or represent a logical extension to the settlement limit, and would not accord with the character of the site or make a positive contribution to the appearance of the locality. The development therefore conflicts with Policies PS1, PS2, PS3, PS4, GDP1, H5, CLF5 and EC5 of the Wrexham Unitary Development Plan.

Rebuttal of Reasons for Refusal

- 3.2 As detailed above, Wrexham's UDP is out of date and should therefore be given decreasing weight in the determination of planning applications, with weight being placed on other material considerations including national planning policy and its presumption in favour of sustainable development.

Nonetheless, non-conformity with UDP Policies PS1, PS2, PS3, PS4, GDP1, H5, CLF5 and EC5 is stated with the reasons for refusal. The conformity with the development plan is therefore considered as Issue 1 below.

Other material considerations are considered under Issue 2.

- 3.3 Issue 1: Conformity with the Development Plan

The conformity of the development proposal against the policies included within Wrexham's UDP is considered in detail within section 4.0 of the "Planning Statement" that was submitted in support of the application and attached at Appendix 2.

As it is not the purpose of this statement to reiterate the content of the "Planning Statement", it focuses on those policies referred to in the reason for refusal, as follows.

3.3.1 Strategic Planning Policies

- UDP Policy PS1 - *New development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.*
- UDP Policy PS2 - *Development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.*
- UDP Policy PS3 - *Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.*
- UDP Policy PS4 - *Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.*

UDP Policies SP1, SP2, SP3 and SP4 form part of a suite of policies within the Wrexham UDP that represent the Planning Strategy of the UDP which is based upon the principles of sustainable development.

As such the development site location is considered to be in a sustainable location as it is located within Penley, one of the rural villages identified for future growth in the UDP. Penley is served by public transport and has an extensive range of services and facilities, reducing the need for car-based transport. The development site is located within walking distance of the settlement's extensive range of services and facilities, including the nursery, primary and secondary schools, shop, community centre, village hall, church, public house and employment opportunities.

The full range of services and facilities offered by regional centres are also easily accessible by public transport as Penley is served by the No. 146 regular hourly bus service between Wrexham – Marchwiell – Penley – Whitchurch. This provides residents with sustainable transport options for accessing wider employment opportunities. Development on this site, in this location, therefore supports the settlement strategy contained in the Plan.

Whilst it is acknowledged that the proposed site lies outside of the settlement limit of Penley, the site lies between the main village settlement limit and the Hill Crest housing estate settlement limit. The development site therefore does not intrude into the open countryside but rather represents an infill opportunity that will reinforce the built form of the settlement.

In addition, it is considered that the scale of the development (26 dwellings) is appropriate to the scale of the settlement as it is of a similar scale to many of the other existing residential developments within the settlement and significantly smaller than the Hill View residential area of the settlement immediately to the south.

The site comprises grade 3 agricultural land, so is not the best and most versatile in the County Borough, which is the grade 1 & 2 land around Wrexham town. There are no adverse environmental impacts on ecology. New hedge and tree planting will soften the development in the landscape, contributing to landscape quality. It is therefore considered that the site can be developed without a significant detrimental effect on the countryside, landscape, open space or quality of the natural environment.

In summary, the proposed development location whilst outside the settlement limits of Penley and not located on brownfield land, is in all other respects considered to accord with the Strategic Planning Policies, and therefore the Planning Strategy of the Wrexham UDP. This conclusion is supported by Wrexham Council's own consideration of an adjoining residential development proposal (application P/2014/0738) detailed within section 3.4.6 of this statement.

3.3.2 Specific Planning Policies

The UDP's Specific Policies expand on the Planning Strategy of the Plan by providing detailed guidance on the development and use of land. The Specific Policies referred to in the reason for refusal, are considered below.

- UDP Policy GDP1 - *All new development should:-*
 - a) *Ensure that built development in its scale, design and layout, and in its use of materials and landscaping, accords with the character of the site and makes a positive contribution to the appearance of the nearby locality.*
 - b) *Take account of personal and community safety and security in the design and layout of development and public / private spaces.*
 - c) *Make the best use of design techniques, siting and orientation in order to conserve energy and water resources.*
 - d) *Ensure safe and convenient pedestrian and vehicular access to and from development sites, both on site and in the nearby locality.*
 - e) *Ensure that built development is located where it has convenient access to public transport facilities, and is well related to pedestrian and cycle routes wherever possible.*
 - f) *Ensure the safety and amenity of the public and safeguard the environment from the adverse effects of pollution of water, land or air, hazards from industry and quarrying, and associated noise, odour or vibration arising from development.*
 - g) *Secure public services (e.g. gas, water, electricity) to development at minimum public cost.*
 - h) *Safeguard sites and areas of nature conservation and wildlife interest, and to provide new habitats where there is an unavoidable loss of existing habitats and areas of wildlife interest.*
 - i) *Ensure that development does not result in, or is subject to, flooding, soil erosion, landslides or contamination, either on or off the site.*

j) Have regard to the need to safeguard those areas that possess a strong Welsh cultural and/or linguistic identity from development that could harm this identity.

k) Secure the development of sustainable communities, through the promotion of the economic, social and environmental well-being of the area.

The proposed development meets this policy in the following regards:

a) As detailed above, the scale of this application accords with the scale of existing residential developments in Penley and its form will continue the line of development in this area of the settlement. In addition, the application is in outline with all matters reserved apart from access it is therefore considered that the detailed design proposals for the development are able to ensure accordance with this policy criterion, for example additional tree and hedge planting will contribute to the locality.

b) & c) The application is in outline with all matters reserved apart from access it is therefore considered that the detailed design proposals for the development are able to ensure accordance with this policy criterion.

d) Pedestrian & vehicular access is considered to be acceptable.

e) Bus stops are 500 metres away. Pedestrians and cyclists can access the facilities in Penley with ease.

f) No pollution is anticipated.

g) The site is easily serviced with utilities available adjoining the site.

h) The site is currently agricultural. No wildlife habitats will be lost.

i) The site is not subject to flood risk or other environmental dangers.

j) The development will not harm the Welsh identity.

k) The development will help secure more sustainable communities by providing 6 affordable homes for rent and widening the choice of market homes in the area. Residents of the development will contribute to the economic and social life of the village.

In summary, whilst recognising that the development proposal is in outline with all matters reserved apart from access and that fully policy adherence is dependent upon detailed design proposals, it is considered that the outline development proposal is in accordance with this policy. This conclusion is supported by Wrexham Council's own consideration of an adjoining residential development proposal (application P/2014/0738) detailed within section 3.4.6 of this statement.

3.3.6 UDP Policy H5 - *Outside defined settlement limits new dwellings will only be permitted where:-*

a) proposals accord with Policies H3, H4, and H8; or

b) proposals comprise infilling subject to Policy GDP1; or

c) an essential need to house a full time agricultural or forestry key worker can be established and

i) the long term financial viability and functional management of the enterprise is proven; and

ii) the person, due to the nature of the work, has to live on the site rather than in a nearby settlement; and

iii) there are no suitable buildings nearby which could be converted into a dwelling; and

iv) the new dwelling is sited adjacent to an existing building, can be landscaped, and is of a form, bulk, design and materials which reflect the locality's rural character.

Any permission will be conditioned to limit residential occupancy to essential workers.

It is acknowledged that the proposal does not accord with criteria a and c. However, the site constitutes larger scale infilling of the gap between Penley village and the suburban housing estate to the south of the village.

- 3.3.7 UDP Policy CLF5 - *New development of ten dwellings or more must provide informal public open space within the site at a minimum level of 0.4 hectare per 50 dwellings, be conveniently located for users, and usable for playing field(s) and/or equipped children's play area(s) and open amenity area(s). In exceptional circumstances, the application of these standards may be varied, in the case of small urban infill housing development, where the developer enters into a legal agreement for financial contributions towards the cost of public open space provision where:-*

a) the site is unsuitable for public open space provision; or

b) the development would not place significant additional pressure on public open space facilities in the vicinity of the site.

The application is in outline with all matters reserved apart from access, it is therefore considered that the detailed design proposals for the development are able to ensure accordance with this policy criterion.

- 3.3.8 UDP Policy EC5 - *Within Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other rural enterprises, and essential operational development by utility service providers, will be strictly controlled.*

Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints.

Whilst the proposed development does lie within the Special Landscape Area, Policy EC5 does not preclude development within this area. This is in accordance with national policy (paragraph 5.3.11 of Planning Policy Wales) which states that non-statutory designations such as Special Landscape Areas “should not unduly restrict acceptable development”.

Wrexham Council adopted its Landscape Character Area Guidance Note 13b “English Maelor” in March 2007 as a “Local Planning Guidance Note”. This document identifies the area within which the site sits as “An area of undulating lowland farmland and small villages which retains evidence of historic landscapes and of alternating English and Welsh influence”. The Guidance Note advises that the overall management strategy for the area is “Conservation and sustainable rural development”. Of particular relevance within the guidance note’s “Management Guidance” section is the aim to “Preserve Local Distinctiveness” and its associated guideline that “The character of rural villages and their setting are particularly sensitive to new development”.

The guidance note also identifies that the western part of the English Maelor area has been designated by Cadw as a Landscape of Special Historic Interest. In this regard, Clwyd-Powys Archaeological Trust’s “Maelor Saesneg” study of this historic landscape has identified a total of 17 detailed historic character areas within the area. The detailed character area within which the appeal site is situated is the Penley character area.

Clwyd Powys Archaeological Trust’s study has identified that the key historic landscape characteristics for the Penley character area include:

- An area of undulating farmland gently sloping to the north, dissected by wooded stream valleys which feed the Emral Brook.
- Field patterns are dominated by large and small irregular field boundaries.
- The widespread occurrence of ridge and furrow cultivation within the character area probably indicates the former presence of medieval open field cultivation which is not clearly represented in the field pattern.
- Modern land use is predominantly pasture, fields being bounded with multi-species hedges with scattered mature oak trees in the hedge lines.
- A more ancient settlement pattern is represented by quite scattered farms, the present settlements at both Lightwood Green and Penley, despite the early documentation of their place-names, being predominantly the creation of the 18th to 20th centuries.
- Between the late 19th century and the 1960s the settlement benefited from the Wrexham and Ellesmere Railway, provided with a station at Lightwood Green.
- The settlement remained relatively small until the creation of the military hospital during the Second World War.

Nonetheless, the development proposal subject of this statement lies between, and blends into the adjoining areas of significant built development to the north and south of the site. The site therefore effectively represents an infill opportunity that will not extend the settlement into its surrounding rural hinterland.

Whilst the application is in outline with all matters reserved apart from access, the detailed design and landscaping proposals for the development will ensure that the development proposal retains views of open countryside along the line of the public footpath, and enhances landscaping to mitigate any impact on wider views of the site from the east and west.

Therefore, whilst the landscape within the area has been identified as being of some significance, the development proposal is not considered to detract from the identifiable characteristics of significance. The site consequently provides an opportunity to provide sustainable development within the settlement whilst meeting the aim of ensuring that the settlement's character and distinctiveness is not adversely affected and, in accordance with local and national planning policy, the Special Landscape Area designation should not restrict its development.

In this regard, it is noted that the development proposal has not elicited objections from either Natural Resources Wales (formerly Countryside Council for Wales) or the Clwyd Powys Archaeological Trust.

Further consideration of this issue is detailed within sections 3.4.5 and 3.4.6, below.

3.4 Issue 2: Other Material Considerations

The information contained within section 3.3 details how the development proposal conforms to the policies contained within the Wrexham UDP.

Other material considerations, that outweigh any potential conflict with the Wrexham UDP, are identified within the "Planning Statement" that was submitted in support of the application (and attached as Appendix 2 of this statement).

It is not the purpose of this statement to reiterate the content of the "Planning Statement". However, for the sake of clarity the following section summarises those considerations.

3.4.1 Planning Policy Wales

Planning Policy Wales (PPW) provides a presumption in favour of sustainable development. Where Local Plan policies are out of date, PPW is given more weight in the determination of individual planning applications (PPW paragraph 2.7.1).

The principles underpinning PPW's definition of sustainable development are set out in PPW paragraph 4.3.1. These principles are considered in detail in section 4.0 of the "Planning Statement" (attached as Appendix 2), which concluded that the proposed development is consistent with the principles and policies of Planning Policy Wales. This conclusion is

supported by Wrexham Council's own consideration of an adjoining residential development proposal (application P/2014/0738) detailed within section 3.4.6 of this statement.

3.4.2 Housing Land Supply

The Welsh Government requires local planning authorities to maintain a 5-year supply of readily developable housing land, as set out in paragraph 9.2.3 of Planning Policy Wales. Wrexham's 5-year housing land supply position is 3.1 years supply. In addition, Welsh Government's Technical Advice Note 1 (TAN 1) advises that where a local planning authority (LPA) does not have an up to date Unitary Development Plan (UDP) or an adopted LDP, the 5 year supply is considered to be zero. Failure to have a 5-year housing land supply is an important material consideration when determining planning applications.

For sites to contribute towards the 5 year housing land supply, sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development. The site is relatively level thus making it a comparatively straightforward site to develop. The entire site is within the ownership of the applicant and there are no ownership issues that would prevent the site from being developed. Penley presents no financial viability issues as a location for development, and the site is eminently deliverable, being located in the 'Rural East' sub-area which is the second most viable area of the County Borough according to the Council's recent Development Viability Assessment (November 2014). In light of these considerations, the site at Ellesmere Lane Penley can demonstrate that it will make an immediate contribution to meeting Wrexham's requirement for a 5 year housing land supply.

3.4.3 The Emerging LDP

The Council is currently preparing its Local Development Plan (LDP) for 2013-2028, with a Deposit draft LDP expected in 2016.

Whilst no weight can be afforded to the emerging LDP at the current time, the evidence base for the emerging LDP includes population projections that forecast an increase in Wrexham County Borough's population over the period 2013-2028 of 1,193 per annum (Wrexham Council LDP Topic Paper 7: Population and Housing (March 2014) page 14). This is a significantly higher annual rate than the average number of homes built per annum in the past 5 years, which was an average of 287 homes per annum 2009-2014. In light of these figures it is clear that more housing land is urgently needed to meet local housing needs.

In order to provide sufficient housing land to meet Wrexham County Borough's needs to 2028, the LDP is expected to roll back some of the Special Landscape Areas and extend some of the settlement limits. In light of this, the existing boundaries of these areas should be regarded as in flux.

3.4.4 Social and Economic Benefits

The proposed development will deliver 6 affordable homes among the 26 units (23% affordable), making a significant contribution to meeting local affordable housing needs.

Future residents will help support Penley's services and facilities, aiding the village's economy. Direct and indirect benefits will arise from the economic activity of the construction project and the long-term economic activity of new households (examples of economic benefits arising from the provision of new dwellings are provided within paragraphs 5.10 & 5.11 of the "Planning Statement" at Appendix 2).

3.4.5 Special Landscape Area

Wrexham Council's LDP Topic Paper 1: Natural Environment (March 2014) details, on page 22, that the Planning Inspectorate's examination of the draft Local Development Plan in January 2012 highlighted that:

- the Special Landscape Areas would need to be reviewed in the replacement Local Development Plan, with a view to identifying suitable sites for development within these Special Landscape Areas; and
- there is a lack of evidence that housing growth would cause unacceptable social and environmental impacts, and in any regard any perceived harm must be weighed against the potentially detrimental impacts that would arise from restricting housing growth

In addition, it is questionable whether the extensive areas that were designated in the Wrexham UDP as Special Landscape Areas meet the criteria set out in Planning Policy Wales that such designations, *"should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. Local planning authorities should apply these designations to areas of **substantive conservation value** where there is good reason to believe that normal planning policies cannot provide the necessary protection. **Such designations should not unduly restrict acceptable development**"* (emphasis added) (PPW paragraph 5.3.11).

It is therefore considered that, whilst a significant amount of land across the County Borough is designated as a Special Landscape Area, including all the land around Penley, the designation should be afforded little weight. This conclusion is supported by Wrexham Council's own consideration of an adjoining residential development proposal (application P/2014/0738) detailed within section 3.4.6 of this statement.

3.4.6 Planning Application P/2014/0738

Wrexham Council, at its Planning Committee meeting on Monday 6th July 2015, resolved to approve planning application P/2014/0738, subject to the completion of a section 106

agreement. The committee report relating to this application is attached as Appendix 3 of this statement and an extract of the Committee meeting's minutes, detailing the decision, is attached as Appendix 4.

Planning Application P/2014/0738 relates to the development of 7 dwellings on land off Tudor Drive, which lies adjoining the southern boundary of the parcel of land within which the development proposal subject of this statement is located. Planning application P/2014/0738 is therefore directly comparable to the application subject of this statement.

In this regard, it is noted from the committee report attached at Appendix 2 that whilst application P/2014/0738 does not comply with UDP policies H5 and PS3, this is outweighed by other material considerations, including:

- a lack of 5 year housing land supply;
- Planning Policy Wales' presumption in favour of sustainable development and, in this regard, the site's sustainable location on the edge of the settlement limit of Penley;

It is considered that the material considerations identified within this committee report, that outweigh any non-compliance with policies H5 and PS3, are equally applicable to the application subject of this statement. Therefore, non-compliance with these policies should not have been identified within the reason for refusal of application P/2015/0399.

Similarly, the committee report at Appendix 3 identifies that application P/2014/0738 complies with policies PS1, PS2 and PS4 of the UDP. Given the similarities between that application and application P/2015/0399, and the information contained within section 3.3.1, it is unclear how these policies have been identified within the reason for refusal of application P/2015/0399.

The other policies quoted within the reason for refusal of application P/2015/0399 are policies GDP1, CLF5 and EC5.

With respect to policies GDP1 and CLF5, as stated within sections 3.3.2 and 3.3.7, it is considered that whilst application P/2015/0399 is in outline only with all matters reserved apart from access, full policy adherence can be achieved through the detailed design proposals. This conclusion is reinforced by the Council's acceptance of P/2014/0738 as it recognises that residential development can be acceptably integrated into this area of the settlement.

With respect to policy EC5 *Special Landscape Areas*, it is noticeable that the committee report in Appendix 3 does not refer to EC5 as relevant to the development proposal. The Council has therefore accepted the principle of development within the Special Landscape Area in this location. This reinforces that the Special Landscape Area should have been afforded little weight in the consideration of application P/2015/0399 (as detailed within section 3.4.4) and the reference to policy EC5 within the application's reason for refusal is therefore inappropriate.

4.0 Conclusion

Wrexham Council has identified Penley in its Development Plan as a sustainable settlement, where new development will meet the needs of the community and helping to sustain local services.

It is acknowledged that the proposed development site lies outside of the settlement limits of Penley and within a Special Landscape Area. However, these issues are outweighed by the following significant considerations:

- The Wrexham Unitary Development Plan is out of date and, as Planning Policy Wales makes clear, where a development plan is out of date local planning authorities should give them decreasing weight in favour of other material considerations;
- The site is well related in both physical and visual terms to existing development and would be a logical extension to the village;
- The Special Landscape Area designation carries only limited weight, given the guidance contained within Planning Policy Wales and the findings of the Planning Inspectorate's examination of the Local Development Plan in 2012; and
- Wrexham's lack of a 5 year land supply. In this regard, the development will contribute to meeting Wrexham County Borough's housing requirements, including provision of 6 affordable dwellings and extending the local choice of housing available. There are no significant adverse impacts that outweigh the need for housing.

In conclusion, the proposed development should be considered in the context of the presumption in favour of sustainable development. The site represents an appropriate form of sustainable development to be encouraged and supported. This conclusion is supported by Wrexham Council's own consideration of an adjoining residential development proposal (application P/2014/0738).

In light of the information provided throughout this statement and in the "Planning Statement" attached as Appendix 2, it is respectfully requested that this appeal be allowed.