

Dear Gemma,

Thank you for the opportunity to comment on the Council's response.

The Council expressly accepts that the appeal site constitutes previously developed land. The proposal therefore falls within Policy S5(1)(d), which separately supports the redevelopment of previously developed land, including redevelopment for residential use. Contrary to the Council's interpretation, S5(1)(d) does not require the site to be physically well-related to a defined settlement. That requirement appears specifically within the alternative unmet-need route under S5(1)(j) and should not be read into S5(1)(d).

Policy S5(3) is also satisfied because the dwelling would not be isolated: the site lies close to existing dwellings and other established built form along and around Spring Gardens. The Council's observations about the distance from a defined settlement do not address the separate question under S5(3), which is whether the home would lie outside both settlements and groups of houses.

Accordingly, the Council has not identified a policy basis for excluding the proposal from S5(1)(d), nor any adverse effects that would substantially outweigh its benefits under the balancing exercise required by S5(1). Those benefits include the effective reuse of previously developed land and the delivery of an additional dwelling in a district where the Council cannot demonstrate a five-year housing land supply. The appellant therefore maintains that NPPF 2026 materially supports the appeal and respectfully invites the Inspector to allow it.

Kind regards

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Chartered Town Planner
For and on behalf of NJA Town Planning Limited



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