

DELEGATED OFFICER REPORT:**Application Ref:** F/26/100950**Site Address:** Land Adjacent to, 7 Birchwood Gardens, Hedge End, Southampton, SO30 2AR**Case Officer:** Clare Martin**Description:** Erection of 1no. detached supported living bungalow (Use Class C3 or C2) with associated car parking and rear terrace

Particular Site Constraints?	Yes ☒	No ☐
• Within urban edge • Tree preservation order • Great crested newts – Amber buffer • Nutrient Neutrality (nitrates only) • Within Solent mitigation and disturbance buffer • Within New Forest mitigation and disturbance buffer		

Planning History?	Yes ☒	No ☐
• F/22/92976 - Erection of 1no. detached three-bedroom dwelling with car parking – Refused (June 2022). • F/08/63548 - Revisions to previously approved communal garden, as approved under planning application F/06/57316, including change of use of former open space within Birchwood gardens and retention of 1.8m high fence – Permitted (February 2009) • F/06/57316 - Erection of 4no. 2 bed flats in a 2 storey block with 4no. car parking spaces, bin and cycle store and new access to Navigators Way – Permitted (August 2006) • Z/15883/006 - Construction of 11 dwellings in two storey block with associated access and parking – Permitted (May 1993).		

Publicity:	Letters ☐	Site Notice ☐	Newspaper ☐
Representations – Objections (summarised):	Twenty-six letters of objection were received raising the following points: <u>Trees, landscaping and biodiversity</u> • Proximity of the proposed dwelling to protected mature oak trees, causing harm to root systems during construction and future pressure for pruning/removal. • Loss of existing green space and associated impacts on wildlife habitats and biodiversity, including bats, birds and hedgehogs. <u>Overdevelopment and harm to character of the area</u> • Proposal represents a cramped form of development on a constrained plot. • Development would erode the open and verdant character of Birchwood Gardens and appear out of keeping with the established pattern of the surrounding development.		

	<u>Highway safety, parking and access</u> • Proposal is within a narrow cul-de-sac with limited turning space. • There are existing parking issues in locality with double yellow line restrictions. • The traffic, servicing and construction vehicles associated with the development would exacerbate congestion, restrict access for emergency vehicles and create highway safety issues. • Practical difficulties associated with contractor parking, deliveries, storage of materials and access for heavy goods vehicles within the constrained road layout. <u>Residential amenity</u> • Overbearing impacts, loss of outlook, light and privacy from neighbouring residents. Increased activity, noise and disturbance from new residents. • Impact on existing residents through noise, dust, vibration and general disturbance during the construction phase. <u>Drainage and flood risk</u> • The proposal includes additional hardstanding and built form, which would increase surface water runoff and exacerbate the existing flooding issues within Birchwood Gardens. • Insufficient drainage information provided. <u>Previous refusal</u> • The revised single-storey dwelling does not adequately overcome previous reasons for refusal in relation to character, overdevelopment, trees and amenity impacts. <u>Insufficient information</u> • Further information require in relation to drainage, underground services and the proposed C2/ C3 use class.
Representations – Support (summarised):	One letter of support was received for the proposed specialised supported living bungalow. It was received from the Rose Road Association, which are a Hampshire-based charity supporting children and adults with learning disabilities, autism, and complex needs. The letter identifies a significant and growing need for accessible supported living accommodation within Hampshire, noting that a lack of suitable local provision can result in residents being placed away from established support networks. The proposal would help address this need by providing high-quality, accessible accommodation within a sustainable residential location, thereby promoting independence and reducing pressure on statutory services. The proposal is a well-considered design tailored to the needs of future residents, including accessible internal circulation, wheelchair-accessible door widths, adaptable bathroom arrangements, and a layout supporting safe day-to-day living. Support is also expressed for the single-storey form of development, which is considered appropriate for supported accommodation and sympathetic to the surrounding residential character.
Tree Officer:	<u>OBJECTION</u>

Ultimately, the position of the proposed structure, ancillary hardscaping and associated amenity space is not consistent with the Trees and Development SPD and policy DM1 of the Local Plan.

The Site

The site contains a couple of significant oak trees (T2 and T3), as well as one close to the existing turning head (T1). All of these trees are subject to a Tree Preservation Order (TPO). Further, there was also another oak tree on the site, which was subject of a TPO application in 2019 and removed. A replacement should have been planted under Condition 3 of T/19/86126.

Missing Replacement Tree

The replacement tree (required under Condition 3 of T/19/86126) does not appear to be present or shown on the tree protection plan. It should be plotted on the proposal and given adequate room to mature.

Dominance

We are concerned about the dominance of the existing oak trees on site. These trees surround the site and will be dominant over what will be a residential garden and occupied living space – it is highly likely to be a source of conflict with any residents.

Whilst the TPO provides a mechanism to control unauthorised pruning, it is not desirable to knowingly put the LPA in conflict with a resident. We acknowledge the daylighting report, and the arboricultural report's statement that all rooms meet BRE guidance, but calculations focus on minimum day light thresholds, and fail to consider both subjective perception of light and, more critically, of risk perception by occupiers. Again, we cannot support a proposal that knowingly creates a potential conflict in this regard.

The stem tree of T3 will also be in very close proximity to the structure (1.2 metres of the main structure) resulting in an unsuitable design relationship. Further, the proposed floor plan shows an additional structure, which may even require tree removal (not mentioned in the arboricultural report).

Root Protection Area Encroachment

The dwelling, and ancillary hardscaping, encroaches significantly into the Root Protection Areas (RPA) of T2 and T3. Whilst we acknowledge that low impact foundations (such as piles) can be used in theory, this situation appears more extreme than previous applications and the applicant has not demonstrated that the trees can remain viable. Ultimately, the default position should be that all structures are located outside of the RPA, as per paragraph 5.3.1 of BS5837.

Submitted Information

The proposal fails to marry the fundamental accessibility requirements of the proposed supported living bungalow with the stated required low impact foundations and the need to raise the structure up to allow for a void under the structure (paragraph 4.6 of the arboricultural report).

Further, the tree information does not mention any garden accessibility details (some of which are shown on the floor plans – see above). If the floor level has to be raised to accommodate the low impact foundations, as a minimum, there will have to be ramps to

	allow for accessibility. If the garden is to be useable as a garden, there will be additional construction work in the RPA of the trees, not shown in the current proposal, some of which may be significantly detrimental given the close position of the trees.
Ecology Officer:	<u>HOLDING OBJECTION:</u> An ecological enhancements plan and a surface water drainage note are required. <u>Ecology</u> I have reviewed the PEA by Ecosupport (updated in August 2025, original survey March 2022). The report notes that there is potential for hedgehogs to be using this site. The mature oak tree was assessed as negligible for potential bat roost features and low potential for nesting and breeding birds but would provide foraging opportunities for birds (and possibly bats). This site is in an amber (medium) impact risk zone for great crested newts. There are records of slow worms, bats and hedgehogs nearby. The consultation response provides the following ecological advice: • The PEA proposes a swift brick, a bat brick and hedgehog gaps in the baseboards of the garden fences as ecological enhancements. The elevation drawing of the bungalow does not show any areas that would be appropriate for a swift brick or a bat brick. Alternative boxes in the retained mature tree would be more appropriate. It may also be possible to build bat or swift features into the roof, but these would need to be recommended by the ecological consultant and approved by the LPA. • Planting flowering plants/shrubs for pollinators is also important. Little green space would be retained on site, so flowering plants or shrubs should be used rather than non-flowering species. • Locations of bat and bird boxes, planting and hedgehog holes in the fences should be agreed before determination if possible and annotated on the site plan. • A precautionary working method must be used to prevent harm to wildlife such as hedgehogs that could be using this site. It should include: - All building materials to be stored on hard standing or on pallets, as far as possible from hedgerows, scrub or potential habitat. - Any excavations must be covered at night or be fitted with a small animal escape ramp. - No fires can be lit on site. - Waste must be stored in a skip and not be allowed to accumulate in piles which could be used by wildlife. Any chemicals and fuels must be stored carefully and away from potential wildlife habitat. - Any animals found on site should not be handled but be allowed to move away to a place of safety on their own. <u>Biodiversity net gain</u> The biodiversity metric shows a loss of 9.63% or -0.024 biodiversity units. The DAS mentions a biodiversity net gain report which does not appear in the list of documents provided. However, it is understood that the Applicant intends to purchase of 0.05 off-site biodiversity units of other neutral grassland in NCA 129. This is satisfactory and can be conditioned. <u>Surface water drainage</u>

	The proposed site plan shows a soakaway under the car parking spaces with new IC surface written in two places. A soakaway must be supported by infiltration testing results to ensure that it can function effectively. It is not clear whether the area around the house (shown in white) is proposed to be paved as it is not shown as vegetated and there is no key on the plan. Permeable paving will be required for the car park and driveway. A surface water drainage note is required to explain what is being proposed for the drainage for this site.
Highways Officer (comments from previous application):	<u>NO OBJECTION</u> Subject to conditions regarding timing of access construction, parking provision and construction site management plan. <u>Access</u> The general layout of Birchwood Gardens is unchanged by the proposals, with parking being provided on what is currently a grassed area adjacent to the turning head. The turning head itself is fully retained, and as such is suitable for the turning of refuse vehicles. Due to the relative tightness of Birchwood Gardens, a Construction Site Management Plan will be required to ensure that obstruction does not occur for other residents Permission is also required from the highway authority for the drop kerb / crossover to access the proposed two parking bays.
Parish Council:	No response

Site Visit:	Yes ☒	No ☐
Details: Carried out 20/4/026		

Pre-commencement Conditions:	Yes ☐	No ☒
Details:		

Legislation:
Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:- <i>"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."</i>

Policy:
National Planning Policy Framework Planning Practice Guidance Development Plan: <u>Eastleigh Borough Local Plan 2016-2036</u> Policies: S1 (delivering sustainable development), S2 (approach to development), S3 (location of new housing), DM1 (General development), DM2 (environmentally sustainable development), DM3 (climate change), DM6 (surface water management), DM11 (nature conservation), DM13 (access), DM14 (parking), DM23 (residential development within urban areas), DM29 (dwellings with higher access standards) & DM30 (internal space standards). Supplementary Planning Documents:

Proposal:

The proposal is for a bungalow on the land adjacent to 7 Birchwood Garden in the north easter corner of the cul-de-sac. The property has been purposely designed to accommodate a disabled person as either a C2 residential institution with a high degree of medical care provided or as C3 supported living dwelling. The application is accompanied by a letter from a Hampshire-based charity supporting people with learning disabilities, autism, and complex needs.

The bungalow is 5m high and is of a brick construction with a tiled pitched roof. It has a rectangular footprint (measuring 97.5m²) which accommodates two bedrooms, a shower/ toilet and open plan kitchen/ dinning/ living area with a level terrace to the rear and a ramp down to a garden. Access is via a porch at the southern side of the building with a path leading to two off road car parking spaces at the front.

Assessment:

Principle

The site is within the urban edge where the principle of development is acceptable, subject to the detailed matters according with the relevant planning policies.

Character and Appearance

Policy DM1 requires development to take full and proper account of the context of the site including the character and appearance of the locality and be well integrated (in terms of mass, scale, materials, layout, density, design and siting), both in itself and in relation to adjoining buildings, spaces and views.

Looking back through the planning history, the site was retained as woodland when the original nine houses were constructed at Birchwood Gardens (Z/15883/6). The large trees were protected under a TPO (tree preservation order) and the verdant nature of the site would have contributed greatly to the appearance of the locality, providing a natural undeveloped space within the small but densely packed residential area. While the open space has been eroded over the years by the introduction of 1.8m high fences, it nevertheless still provides a welcome gap in development, which contributes to the setting of Birchwood Gardens.

The introduction of a dwelling and associated infrastructure would result in the loss of a large portion of the existing green space, and this loss formed a reason for refusing for the previous two storey house (F/22/92976). It is acknowledged that the dwelling has been reduced from a house to a bungalow and this lower roof height would allow some visibility over the building to the trees and gardens beyond. However, the dwellings footprint has increased from 60m² to 97.5m² and now includes additional ramps for wheelchair access, therefore increasing the amount of built form at the site.

The bungalow itself is of a simple design and will use similar materials to the existing properties within Birchwood Gardens. However, its wider frontage and proportions would look out of place against the narrower fairly uniformed two storey dwellings within the cul-de-sac. The bungalow would also be pushed up close to the front boundary next to the hard surfaced parking area and so leave limited greenery at the public facing road side.

The provision of the bungalow and subsequent loss of the green space would present a much more urban form to Birchwood Gardens, which would detract from the character and

appearance of the residential area. The proposal is therefore contrary to Policy DM1 of the Eastleigh Borough Local Plan (2016-2026), and provisions with the National Planning Policy Framework (Dec 2024) & the Councils Quality Places SPD (2011).

Impact on Protected Trees

Policy DM1 requires development not to result in the loss or damage to trees, unless they can be replaced with features of equivalent or enhanced value. Detailed guidance is provided within the Council's Trees and Development SPD.

The site contains two significant mature oak trees at the rear (T2 and T3), and another on the land in front of the site close to the existing turning head (T1). All of these are important trees that add to the visual amenity of the locality and are subject to a blanket Tree Preservation Order (TPO).

The council's default position is that all structures are located outside of the Root Protection Areas (RPA), as per paragraph 5.3.1 of BS5837. In this case, the dwelling and associated hard surfacing encroaches significantly into the RPA of T2 and T3, and due to the bungalows larger footprint would result in a more extreme encroachment than the previously refused house. Whilst we acknowledge that the low impact foundations (such as piles) can be used in theory, the main dwelling would be just 1.2m away from the stem of T3 putting this tree under significant pressure.

The proposal also includes a 3m deep terrace behind the dwelling, which is shown on the floor plan & elevations. The terrace would bring the built structure even closer to tree T3 than shown on the site plan and could result in the removal of T3 altogether. The rear terrace has not been considered within the submitted arboricultural information. Nor does the submitted information consider that the low impact foundations would raise the property's floor level and so longer ramps or additional structure maybe require for wheel chair access. Therefore, the development is likely to encroach even further in the root protection area than that currently shown.

In conclusion, the information provided has not demonstrated that the proposal can proceed without jeopardising the health and long-term retention of the protected Oak Trees. As such the proposal is contrary to Policy DM1 of the Eastleigh Borough Local Plan (2016-2026), and provisions with the National Planning Policy Framework (Dec 2024) & the Council's Trees and Development SPD.

Impact of Tree on Living Conditions

Policies DM1 & DM30 require all new dwellings to provide a good living environment for their future residents and to meet the Nationally Described Space Standards. In terms of external amenity space, Quality Places SPD requires all new residential developments to have an outdoor amenity space of at least 60% of the dwellings floor space. It recommends that amenity spaces be increased where excessive shading from buildings, trees or other structures renders significant areas of the garden unusable.

The bungalow has been designed to accommodate a wheelchair user and so the internal rooms are of a generous size, which easily meets the nationally described space standards. In terms of outdoor amenity space, there is a terrace at the back of the bungalow with a ramp down to a compact rear garden. The size of the outdoor space meets the council's 60% rule.

A key reason for refusing the previous two storey dwelling was the quality of the living environment, with concern raised that the TPO trees would adversely affect the light and amenity of the dwelling and its outdoor amenity area. This impact is further exacerbated in the current proposal in that the bungalow and windows to its key living space are closer to the trees and the garden has been reduced in size.

As a response a daylight, sunlight and overshadowing report has been submitted. The report concludes that the rear kitchen/ dining/ living area will achieve the BRE minimum daylight standards, but the available daylight will be restricted to the bedrooms during the summer months (falling below standard).

In terms of sunlight, the BRE guidance recommends that 50% of the area of each amenity space received at least 2 hours of sunlight on 21st March. The report is inconclusive on this point as if the trees are bare branched then 68% of the available amenity space meets the BRE standard, whereas if the trees are in full leaf then only 35% of the amenity space meets this standard. Realistically, the trees are likely to be somewhere in between and if an average is taken then this is around the required 50%.

In summary, some concern remains regarding the quality of the living accommodation and outdoor amenity space with the proposal being around or just below the minimum daylight and sunlight standards. It should also be noted that the perception of light is subjective and would vary depending on the future occupier of the dwelling. As such introducing a new bungalow on the site could create the need to carry out future tree works.

Whilst the TPO provides a mechanism to control unauthorised pruning, it is not advisable to knowingly create a situation where there could be a future conflict between the living standards of the residents and health of the TPO trees.

Another important consideration is the physical dominance of the trees on the living space and garden, with tree T3 being 1.2m from the main rear kitchen/ living room/ dining room window and even closer to the rear terrace. The close physical proximity of the trees to the property could create an uncomfortable relationship for the new residents and so increase pressure for future tree works.

The Trees and Development SPD covers this point stating that *"Where development occurs too close to trees, problems can occur as the tree grows, increasing the likelihood that heavy pruning will be required, or that the tree will need to be removed; both of which outcomes can result in a detrimental impact on amenity and the environment"* (section 15).

In conclusion, the information provided has not demonstrated that the proposal can provide a suitable living accommodation for its future residents without resulting in significant pressure to prune or fell nearby TPO trees, which are an important feature within the locality. As such the proposal is contrary to Policies DM1 & DM11 of the Eastleigh Borough Local Plan (2016-2036), provisions within the National Planning Policy Framework and The Council's Trees and Development Supplementary Planning Document.

In addition, there is no sign of the replacement Oak Tree which was supposed to have been planted. This was a condition of the TPO consent that allowed the felling of one Oak Tree at the site in 2019 (T/19/86126). If the current development goes ahead, there is unlikely to be sufficient space remaining within the small rear garden for this replacement tree, without limiting its growth or negatively impact the living standards if the residents. The proposal is therefore contrary to the trees and development SPD, which states: *"There should be adequate space allowed for newly planted trees to reach their full mature height and spread without causing nuisance to adjacent buildings and occupants"* (paragraph 43.2).

Other Considerations

Impact on Residential Amenity

While the proposal is close to a number of residential properties, its single storey nature means the bungalow will not unacceptably impact upon the outlook or light received by existing residents. The property's main windows are to the front, rear and southern side. The front bedroom windows would overlook the public space and the views from the rear and side windows would be restricted by boundary fencing. Depending on the final height of the terrace, additional screening could be secured via condition to ensure reasonable

privacy remains for the adjoining residents. As such the proposal is not considered to have an unacceptable impact on the amenity of existing residents.

Car Parking and Highways

The proposed two bed dwelling includes two on site car parking spaces at the front of the property (in the current fenced area). The parking provision accords with the Council's Parking Standards SPD and the spaces will be accessible from Birchwood Gardens. The parking arrangements would not impact upon the existing turning head, which is suitable for turning refuse and construction vehicles.

The new dwelling will result in a small increase in the number of traffic movements within Birchwood Gardens and a negligible impact on the wider road network. The current proposal is of a smaller scale than the original two storey house, for which no objection was raised by the County Highway Officer (subject to a construction management plan condition).

Ecology

A preliminary ecological assessment has been submitted which identifies a potential for hedgehogs to be using the site. The Oak Trees also provide potential foraging opportunities for birds and bats and a low potential to accommodate for nesting and breeding birds. The report has been reviewed by the Council's ecologist who has provided further advice on ecological enhancements and precautionary works methods. This additional information could have been secured via condition had the application been recommended for permission.

Biodiversity Net Gain

While the metric for the proposal shows a biodiversity loss, the applicant intends to provide a 10% biodiversity net gain through the purchase of off-site biodiversity credits. Evidence of this purchase could have been conditioned.

Surface water drainage

Basic drainage information has been provided, with the site plan showing a soakaway under the car parking spaces. The Council would want further information about the type of surfacing materials (e.g. permeability), infiltration testing for the soakaways and a drainage strategy note. However, the missing drainage information could have reasonably been secured through a planning condition.

Impact of Special Protection Area:

The Council, as the responsible body for Habitats Regulations Assessment (HRA), must ensure as part of a planning application that a development will not have an adverse impact upon any European protected sites, and specifically in this case, the European protected Solent Complex (SPA, SAC and Ramsar sites), River Itchen (SAC) and New Forest National Park (SPA, SAC and Ramsar sites).

Recreational Disturbance

The site is within both the 5.6km catchment area for the Solent Special Protection Area and Ramsar Site and the 13.8km catchment area for the New Forest Special Protection Area. It is recognised that new housing developments within these catchment areas are likely to result in additional visitors and potential damage to these protected sites. To mitigate for these recreational impacts, new housing developments are required to contribute towards the Solent Recreation Mitigation Strategy (which manages visitors to the coastline) and the Council's New Forest Mitigation Strategy (which provides Suitable Alternative Natural Green Spaces within the borough and funding towards an additional range post for the New Forest). No contribution has been received to date and no legal agreement has been secured.

Nutrients

The site is within the impact zone for nitrogen, which has been shown to have a determinantal impact on the water quality of the Southampton and Solent Water Special Protection Area through eutrophication. A nutrient budget has been provided for the development, which shows a positive output for nitrogen. It is the Applicant's intention to purchase nutrient credits from the Eastleigh Borough Council scheme, which identifies areas of agricultural land and removes these from a nitrate intensive use, thus reducing the nitrogen input into the protected sites. However, the mitigation has not been secured via a condition and the Applicant has not entered into a legal agreement.

Without securing the necessary mitigation, the proposal would have a likely significant impact on the internationally designated sites.

Equalities Act:

Section 149 of the Equalities Act 2010 created the public sector equality duty.

Section 149 (1) states:

A public authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

When making policy decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups.

It is considered that this application does not raise any equality implications.

Climate Change:

In July 2019, the Council declared a Climate Change and Environmental Emergency. In doing so it agreed, among other things, to: (a) put in place measures to ensure the Council's own operations and functions achieve carbon neutrality by 2025; (b) work with partners to aim for all projects and services delivered in the Borough to achieve carbon neutrality by 2030; (c) ensure that the Council's procurement policy recognises carbon neutrality as one of its primary considerations; and (d) recognise the urgency of action to mitigate and adapt to climate change in every decision taken by the Council. This is underpinned by the Climate and Environment Emergency Strategy 2020–2030 and the supporting Climate and Environmental Emergency Action Plan – Update June 2020.

The declaration of the Climate Change and Environmental Emergency demonstrates a strong commitment from the Council to achieve net zero. The NPPF, development plan and plan policy do not set this as a specific target, but it is a material consideration to be considered alongside all other material considerations. In any case addressing climate change is a core part of the NPPF and plan policy. The need to support the economy is part of the Strategic Environmental Assessment for the Local Plan, as is an assessment of climate impacts.

The NPPF aims for the need for housing to be met, and Policy S2 of the Adopted Local Plan sets a target for 14,580 dwellings to be provided by 2036. The NPPF, Policies S1, DM2 and DM3 of the Adopted Local Plan and energy and water elements of the adopted Environmentally Sustainable Development SPD require development to be sustainable in terms of resource use, climate change and energy use. When considering the impact of climate change, the proposed development is expected to be resilient to the potential effects of climate change and is expected to reduce/limit impacts on climate emissions as a result of the development or its use.

Conclusion (Housing Land Supply and Tilted Balance)

Recommendation:	PERMIT ☐	REFUSE ☒
The National Planning Policy Framework (December 2024) requires all councils to demonstrate a five-year supply of housing. Eastleigh Borough Council's latest housing supply report identifies a supply of 4.1 years, including a 5% buffer (as of 1 April 2024). Therefore, due to the shortfall in housing paragraph 11d of the NPPF applies. This requires Local Planning Authorities to consider whether any adverse impacts of the housing development would significantly and demonstrably outweigh the benefits. In terms of benefits, the proposal would make a very modest addition to the council's five-year housing land supply. The bungalow would provide wheelchair friendly accommodation of which there is a recognised need in the borough, and the scheme is supported by a local disabled charity. The site is also within a sustainable urban edge location, within easy distance of various of goods and services (including a supermarket, church, health facility, school and parkland). However, concern remains about whether the property would be able to provide a suitable living environment for its residents, given the proximity to the TPO trees and this relationship would increase pressure to carry out future tree works. Furthermore, the physical encroachment of the proposed structures into the tree root protection area would cause harm to the protected trees and the bungalow (and subsequent loss of green space) would be detrimental to the character and appearance of Birchwood Gardens On this basis, the contribution of a single supported living dwelling is not considered to represent a sufficient benefit to significantly and demonstrably outweigh the identified harms. It is therefore recommended that planning permission is refused.		