

# **Re-Determined Appeal**

**Land at Lea Castle Farm, Wolverley Road, Broadwaters, Kidderminster,  
Worcestershire**

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Appellant's Opening Submissions

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1. This is an inquiry into the re-determination of an appeal against a refusal by Worcestershire County Council of an application for planning permission for a





shown that this quarry's high environmental standards and restoration scheme are strong indicators of its appropriateness in the Green Belt.

11. Furthermore, even if this Inspector disagrees, it will be demonstrated that there are very special circumstances which clearly outweigh the harm by reason of inappropriateness and any other harm. On the Council's case the only potential 'other harm' is the less than substantial harm to the setting of a listed building and the Council accepts that, even according that harm 'great weight', it is outweighed by the public benefits of the proposal.
  
12. The proposal was the subject of a very detailed and carefully reasoned officer's report to Committee which recommended approval. It was subject to full consideration by many statutory consultees and all technical concerns were resolved satisfactorily. The Statement of Common Ground<sup>7</sup> sets out the extensive list of



- the proposal would not offer harm to the highways network, meaning

15. This Inspector will be invited to form the same conclusions on these issues on the basis of the extensive technical information in the ES documentation, which has been summarised and updated in the expert evidence produced for this Inquiry.

16. In conclusion, there is an urgent need for this scheme to provide the minerals necessary to support the policy ambitions for economic growth and housing development. The previous Inspector, the Council, and all the relevant expert consultees agree that there are no technical, landscape or amenity issues capable of preventing planning permission from being granted. The previous Inspector considered the question of very special circumstances to be ‘very finely balanced’ against the proposal. That balance must now be tipped the other way in favour of allowing the appeal. This is for two main reasons: First, properly considered, the scheme is precisely the type of development which national policy encourages as an exception from being inappropriate in the GB such that vsc are not required to be demonstrated; Second, 4-2 ( )TJ o2 (i)--1 ( )# (r)304 Tc 0.004 Tw 1019TJ6.