

PLANNING STATEMENT

65-69 HOLMES ROAD
LONDON, NW5 3AN

DECEMBER 2023

SMPlanning



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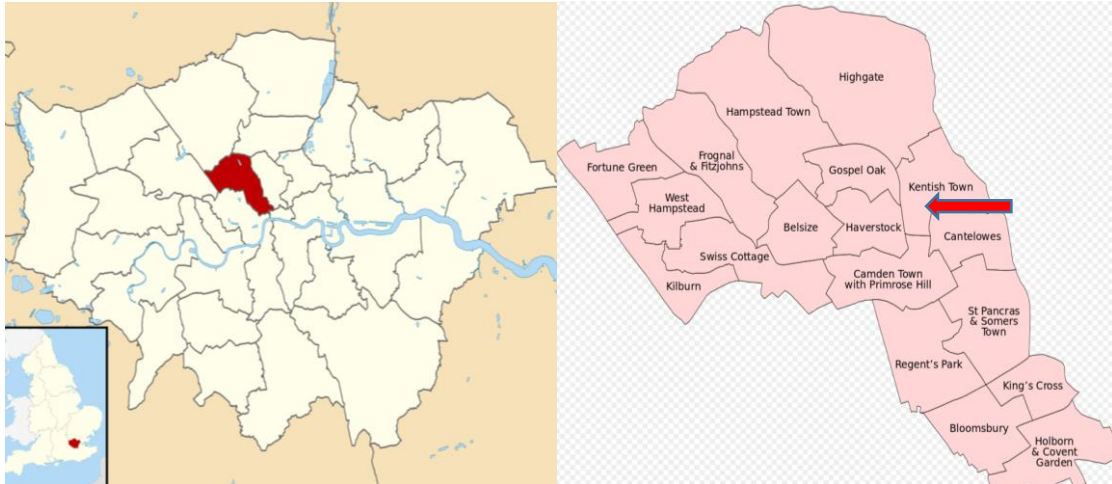
1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by SM Planning in support of a planning application submitted on behalf of Hallmark Property Group for the erection of an additional floor of student accommodation to accommodate 11 single rooms at 65-69 Holmes Road, Camden, NW5 3AN.
- 1.2 An extant permission originally approved under 2013/7130/P dated 06 March 2014 has been completed for a seven-storey building (plus two basement levels) with student accommodation, warehouse and café uses.
- 1.3 A separate application referenced 2018/4871/P, for an additional floor of accommodation to facilitate the creation of 42 student rooms, was refused by the Local Planning Authority on 4 March 2019 and subsequently dismissed at appeal.
- 1.4 In dismissing the appeal the Inspector supported the LPAs position that the extension would create a top-heavy building at odds with the character of the area that would also be harmful to the living conditions of 74 and 55-57 Holmes Road. The Inspector accepted that the room sizes were adequate for the purposes of student accommodation but considered the ceiling heights to be inadequate.
- 1.5 An amended application was thereafter submitted which sought to address the concerns expressed in the earlier refusal by reducing the scale of the structure. However, this was similarly refused by the LPA and dismissed at appeal but in dismissing the appeal the Inspector considered positively:
 - That matters of outlook and ventilation had been addressed
 - That little weight was attached to the negative comments of the previous Inspector given the change in circumstances
 - That the proposal would not be overly dominant in visual terms
 - That the proposal would not detract from the overall value of the adjacent conservation area
 - That the Daylight and Sunlight Study adequately addressed issues of a loss of light
 - That the living environment for the occupiers of no.74 Holmes Road and the south-west facing flats at 55-57 Holmes Road would not be adversely affected by the proposal
 - That anti-social and unneighbourly behaviour was not identified as a matter to be considered through the appeal process
- 1.6 The Inspector did however have some concerns about the visibility of the side elevation from Holmes Road close to the corner with Cathcart Road and from Cathcart Road itself and considered that the stepping of the building would undermine its existing architectural style. He considered that this would be exacerbated by the introduction of additional external materials. The Inspector also considered that the outlook of the occupiers of 55-57 Holmes Road would be adversely affected by reason of the location of windows and balconies on their west side.

- 1.7 This application has been submitted in the context of the dismissed appeal scheme and sets out the planning justification for the proposed development. It assesses the proposals against national planning policy and the development plan and should be read in conjunction with all other supporting documentation.

2. SITE & SURROUNDING CONTEXT

- 2.1 In terms of context the application site is located within the administrative area of the London Borough of Camden, a Borough in north-west London (partly within inner London) divided into 18 three-member wards. The application site is located within the administrative ward of Kentish Town.



- 2.2 The ward of Kentish Town is a suburban area of north London, primarily residential in character but with a mix of commerce and industry. The ward is well connected, benefiting from several bus routes as well as underground and overground rail services into and out of central London. Accordingly, the site has a Public Transport Accessibility Level (PTAL) rating of 5 which is equivalent to 'very good' accessibility, highlighting the highly sustainable location of the application site.
- 2.3 The site is located outside of, but sandwiched between the Inkerman and Bartholomew Estate Conservation Areas.
- 2.4 The Inkerman Conservation Area, to the immediate south and west of the application site, is largely residential in character but also comprises a limited mix of commercial, employment and academic uses on Holmes Road on the approach towards the application site. In that regard there is a substantial differential in architectural and historic value between built development within the conservation area and that of the application site and its immediate surroundings.
- 2.5 Similarly, the Bartholomew Estate Conservation Area to the east of Kentish Town Road is largely residential in character, comprising a regular grid pattern of continuous ribbon development from the Victorian era.
- 2.6 The site is located at 65-69 Holmes Road and previously comprised a low-rise commercial building generally dwarfed by surrounding development. That building has been demolished and construction work is now complete on development approved under planning application reference 2017/6786/P which granted permission for a 7-

storey building (with 2 basement levels) for the purposes of student accommodation, warehouse space and a coffee shop.



- 2.7 Cathcart Street and the residential housing on Azania Mews bound the southwest of the application site and low-rise residential and commercial buildings surround the site to the south and west. A six-storey residential building is located to the immediate northeast of the site.

3. THE PROPOSED DEVELOPMENT

- 3.1 The previously approved planning applications are complete and this application therefore seeks full planning permission for a roof extension, created by virtue of a seventh-floor addition to facilitate an additional 11 student accommodation rooms.
- 3.2 The proposed 7th floor layout will accommodate 11 studio units of similar size as the existing student accommodation units. Access to the proposed floor would be via the existing lift and stair core which will extend up to the proposed floor but with reduced external massing.
- 3.3 The proposed 7th floor is defined by a simple box that is set back from the 6th floor and covered with matching aluminium mesh to create a unitised homogenous form.
- 3.4 By using the same facade treatment as on the floor below, the aim is to not undermine the existing architectural style. This results in a minimal aesthetic that is complementary in relation to the existing built form. The set back of the new floor aims to reduce the visual impact from street level as well as to neighbouring properties.
- 3.5 An internal floor to ceiling height of 2.5m is proposed across the whole proposed floor, similarly in response to the previous Inspectors comments.
- 3.6 A green roof system is proposed as the main roof finish, which is in line with the existing approved scheme.
- 3.7 For full details on the proposed development please refer to the Design and Access Statement that supports the application.

4. PLANNING HISTORY

The Application Site

- 4.1 The application site has been the subject of a detailed planning history which is set out in chronological order below.
- 4.2 On 13 October 2009 full planning permission (**2009/3187/P**) was refused by the Council. The application sought the erection of a part six, part three storey building with three and two basement levels respectively to provide student accommodation comprising 358 self-contained study rooms with ancillary facilities (Sui Generis), storage and distribution use (Class B8) at lower basement and ground floor level and restaurant (Class A3) at ground floor level. (Following the demolition of the existing warehouse building). The decision notice listed 26 individual reasons for refusal which were later consolidated and/or addressed through further applications listed below.
- 4.3 On 4 February 2011 full planning permission (**2010/6039/P**) was refused by the council. The application sought the erection of a part six, part three storey building with two basement levels to provide student accommodation comprising 268 student rooms housed within 245 units with ancillary facilities (sui generis), storage and distribution use (class B8) at lower basement and ground floor level and coffee shop (class A1) at ground floor level.
- 4.4 An appeal was lodged (**APP/X5210/A/11/2153696**) and subsequently allowed by the Planning Inspectorate on 1 December 2011. In allowing the appeal the Inspector stated:
- In this instance, there would be no displacement of any existing residents or loss of family housing and the existing character of Holmes Road is mixed use rather than predominantly residential. In fact, arguably the proposal could lead to the release of some existing housing in the Borough currently used by students. The site is in a sustainable location and the local infrastructure is already commensurate with a busy urban location, with a wide variety of shops on nearby Kentish Town Road where there are also buses and an underground station.*
- 4.5 Further, in terms of the over-concentration of student housing, the Inspector considered 417 beds to be acceptable in stating:
- I do not find the proposal would result in an undesirable over-intensification of PBSA or harm the overall social balance of the wider community, but rather serve to redress it by bringing the proportion of students in Kentish Town up to the Borough average.*
- 4.6 On 25 March 2013 full planning permission (**2012/6548/P**) was refused by the council. The application sought the erection of a part seven, part three storey building with two basement levels to provide student accommodation comprising 313 student rooms

housed within 278 units with ancillary facilities (sui generis), office use (Class B1) at lower basement and ground floor level.

- 4.7 An appeal was lodged (**APP/X5210/A/13/2197192**) and subsequently dismissed by the Planning Inspectorate on 4 October 2013. In dismissing the appeal the Inspector nevertheless commented on the existing character of the area in stating:

Holmes Road and its immediate environs has no predominant land use character, but comprises a complex mosaic of uses. The built environment and townscape inevitably reflect this complexity, and include a great variety of buildings from the early Victorian to the highly contemporary. Therefore they also exhibit a mix of architectural styles, building heights and other dimensions, vehicular and pedestrian access arrangements, external materials etc.

- 4.8 In considering the 'over-concentration' of student numbers the Inspector commented that:

...there is nothing in development plan policy which sets a mandatory limit, whether numerical or proportional, on student numbers in any given area, whether that be for Camden as a whole, Kentish Town, the local ward, or just Holmes Road and its immediate environs. (The Council's CPG2, housing, does include some numerical limits which I consider helpful but they are merely indicative)... The important question of over-concentration is therefore a matter of balanced judgement...

- 4.9 In his judgement of 'over-concentration', the Inspector was uncategorical but applied a cautious approach in stating:

I find it impossible to say categorically whether the proposed increase (133, or about 30% compared with the approved scheme) in student numbers would bring about a harmful over-concentration. However, I am cautiously inclined to believe that it might cross an ill-defined threshold. I am in little doubt that there would be more occasions or events of noise and disturbance locally, arising from the effects of the aforementioned student exuberance, and this would be likely to provoke more complaints from the general public living in the area. And I note that there are many more new flats in the immediate vicinity than there were a few years ago. To my mind, this consideration, while not by itself decisive in the appeal, does little to commend the current scheme.

- 4.10 In summarising, the Inspector maintained a degree of uncertainty over his conclusions:

*In sum, it is not clear whether the proposal would conflict with relevant policies for student accommodation, as they tend to pull in opposite directions. In other words, the policies are broadly supportive, but with important caveats intended to safeguard locally resident communities. But in the final analysis I agree with the Council that there are some reasonable grounds for concern about a likely increase in noise and disturbance from the significant proposed increase locally in student numbers. **This might, just,** bring about or reflect an undesirable over-concentration.*

- 4.11 On 6 March 2014 full planning permission (**2013/7130/P**) was granted, subject to a Section 106 legal agreement, by the council. The application sought the erection of part seven, part three storey building above two basement levels to provide student accommodation comprising 273 units (337 rooms and 439 bed spaces) with ancillary facilities (sui generis), warehouse (Class B8) at basement and ground floor levels and coffee shop (Class A1) at ground floor level following demolition of existing B8 buildings.
- 4.12 The scheme effectively amalgamated the two previous proposals combining those elements that were considered acceptable by the respective Inspectors. The committee report usefully provided a breakdown of the scheme and its two predecessors, copied below (with only the 2012 application not receiving planning permission:

	2010/6039	2012/6548	2013/7130
Student	245 units	278 units	273 units
accommodation	268 rooms	313 rooms	337 rooms
	417 beds 27 wheelchair 92 single 288 twin (144 rooms) 10 double (5 rooms) 30 cluster beds in 4 units (3 double rooms = 6 beds, 24 single rooms) (appears that 3 cluster flat double rooms were missed from calculation as approved plans show 420 beds)	550 beds 30 wheelchair 11 single 402 twin (201 rooms) 62 double (31 rooms) 45 cluster beds in 5 units (5 double rooms=10 beds, 40 single rooms) (133 bed/32% increase on 2010/6039/P)	439 beds 28 wheelchair 107 single 196 twin (98 rooms) 72 double (36 rooms) 36 cluster beds in 4 units (4 double rooms = 8 beds, 28 single rooms) (22 bed/5% increase from 2010/6039/P)
Useable landscaped area	584m ² total two areas of 544m ² on podium and 40m ² at lower basement	163m ² total two areas of 123m ² and 40m ² at lower basement	582m ² total two areas of 542m ² on podium and 40m ² at lower basement
Study/social area	789m ² Including 611m ² study/social/reading/ meeting/screening; 47m ² laundry; 131m ² gym,	722m ² Including 672m ² communal study area; 50m ² laundry room	780m ² Including 520m ² study/social/reading/ meeting; 92m ² screen room; 55m ² laundry room; 131m ² gym
Commercial	2,073m ² (B8 warehousing) Comprising 510m ² at LB, 920m ² at UB, 460m ² at mezz and 183m ² at G showroom	1,660m ² (B2 industrial)	2,103m ² (B8 warehousing) Comprising 510m ² at LB, 937m ² at UB, 465m ² at mezz and 191m ² at G showroom.
Goods yard	189m ²	0m ²	189m ²
Coffee shop	54m ²	0m ²	43m ²

- 4.13 On 27 May 2016 full planning permission (**2015/5435/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of planning permission 2013/7130/P.
- 4.14 The amendments to the approval included the extension of the lower basement level to relocate part of the approved warehouse (B8) use from the mezzanine floor; the provision of supplementary space for student accommodation use on the mezzanine floor; changes between double and twin rooms of the student accommodation; various minor internal alterations and external alterations to the lift overrun and new rooflights and lightwells. The application proposed no changes to student numbers.

- 4.15 On 3 May 2017 full planning permission (**2016/4664/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of planning permission 2013/7130/P (as varied by 2015/5435/P). The amendments to the approval included the reconfiguration of the warehouse levels and ground floor areas to provide an enlarged social area for the student accommodation use; an additional row of windows on the Holmes Road elevation; additional rooflights into basement and changes to the positioning of windows. The application proposed no changes to student numbers.
- 4.16 On 27 July 2018 full planning permission (**2017/6786/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of 2013/7130/P (as varied by 2015/5435/P and 2016/4664/P). The amendments to the approval included the lowering of the basement level by 950mm, internal changes, the increase in area and volume of warehouse space and the reduction of ancillary student space (including the gym facility). The application proposed no changes to student numbers.
- 4.17 On 4 March 2019, full planning permission (**2018/4871/P**) for a 7th floor extension to facilitate the creation of 42 student accommodation rooms was refused by the council and subsequently dismissed at appeal (APP/X5210/W/19/3229042). In dismissing the appeal the Inspector supported the LPAs position that the extension would create a top-heavy building at odds with the character of the area that would also be harmful to the living conditions of 74 and 55-57 Holmes Road. The Inspector accepted that the room sizes were adequate for the purposes of student accommodation but considered the ceiling heights to be inadequate.
- 4.18 On 2 May 2020, full planning permission (**2018/4877/P**) was granted by the council. The application sought the formation of a mezzanine floor (at basement level) to provide study rooms, administration, storage areas, kitchen and gym facilities within the student area of the building.
- 4.19 On 01 September 2020, full planning permission (**2020/2406/P**) was refused by the council. The application sought the erection of a 7th floor extension to facilitate the creation of 27 student accommodation rooms.

The Surroundings

- 4.20 A number of development proposals have been granted planning permission in the recent past. The most relevant are summarised in address order below.
- 4.21 61-63 Holmes Road - Full planning permission (**2011/0201/P**) for a 5 storey plus basement building with light industrial (B1) at basement and ground floor level and 8 residential flats above, was refused by the council on 27 September 2011. Permission was subsequently granted on appeal under appeal reference **APP/X5210/A/11/2163152** on 12 March 2012.

- 4.22 55-57 Holmes Road – Full planning permission (**2008/1304/P**) for two additional storeys to the building to create 3 residential flats was refused by the council on 21 January 2009. Permission was subsequently granted at appeal under appeal reference **APP/X5210/A/09/2104541** on 18 September 2009. Subsequent applications to allow a change of use to parts of basement and ground floor from warehouse (B8) and office (B1a) to residential were approved by the council under applications **2010/6016/P** and **2011/2627/P**.

Full planning permissions **2018/0622/P** and **2017/6322/P** were latterly granted for an extension at sixth floor level and a rear extension to provide additional residential floor space on 3 April 2018 and 26 January 2018 respectively.

- 4.23 Simone House (formerly 74a Holmes Road) – Full planning permission (**2005/3264/P**) for the demolition of a vacant vehicle repair workshop and erection of a 5 storey mixed use building with flexible business (B1) space on the ground floor and 27 affordable units above was approved by the council on 3 November 2005.
- 4.24 54-74 Holmes Road – Full planning permission (**2003/1212/P**) for the demolition of a warehouse/industrial (B8) building and the erection of a 5 storey building comprising business use (B1) at ground floor with 4 studios and 27 cluster flats (182 bed rooms/spaces) for students above was approved by the council on 23 November 2004.
- 4.25 52 Holmes Road – Full planning permission (**2016/1986/P**) for the demolition of an existing building and its replacement with a new build mixed use development of 6 storeys (plus basement) comprising of 9 self-contained units (8x2 bed and 1x3 bed) and 377sq.m of industrial employment space (B1c) at basement and ground floors was approved by the council on 25 May 2017.
- 4.26 41-43 Holmes Road – Full planning permission (**2012/6344/P**) for extensions to a hostel in order to facilitate an increase from 43 to 59 rooms as well as ancillary office/commercial and storage space was approved by the council on 7 October 2013.
- 4.27 45 Holmes Road – Full planning (**2015/3131/P**) for a 3 storey extension to provide 8 residential units was approved by the council on 28 January 2016.

5. PLANNING POLICY CONTEXT

- 5.1 This Section provides an overview of national and local planning policy relevant to the determination of the planning application proposal, as well as any other relevant national or local planning guidance.

LEGISLATION

Planning (Listed buildings and Conservation Areas) Act 1990

- 5.2 Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Planning and Compulsory Purchase Act 2004

- 5.3 Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICY

National Planning Policy Framework (2023)

- 5.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in formulating local planning policies and taking decisions on planning applications.
- 5.5 At the heart of the NPPF is a presumption in favour of sustainable development (paras 7-14) and paragraphs 8, 9 & 11 are helpful in applying this presumption.
- 5.6 Paragraph 11 sets out how this is to be applied. It states that, *for decision-taking, this means:*
- *Approving development proposals that accord with an up-to-date development plan without delay; or*
 - *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 5.7 The NPPF introduces three dimensions to ‘Sustainable development’ (Economic, Environmental & Social - para 8), and advises that they are interdependent and need to be pursued in mutually supportive ways. The applicant considers that the development meets all three threads of sustainable development.
- 5.8 Further, the decision-taker is required to consider whether the development accords with an up-to-date development plan – and if it does planning permission should be granted unless material considerations indicate otherwise. The applicant considers that the development accords with the development plan.
- 5.9 Finally, the decision-taker is required to determine whether there are any relevant development plan policies, or the policies which are most important for determining the application, that are out-of-date and if not, grant permission unless:
- *the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.*
- 5.10 Section 5 refers to housing. With regard to delivering a wide choice of high-quality homes, paragraph 60 re-iterates the governments objective of significantly boosting the supply of homes and states the importance of a sufficient amount and variety of land can come forward where it is needed and that land with permission is developed without delay. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, students).
- 5.11 Paragraph 65 states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. However, exemptions to this 10% requirement are made where the site or proposed development provides specialist accommodation for a group of people with specific needs such as purpose-built accommodation for students.
- 5.12 Section 9 refers to transport and states at paragraph 106 that planning policies should support an appropriate mix of uses across an area in order to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. In this instance, the application site is located with good links to alternative facilities and is therefore an inherently sustainable location.
- 5.13 Section 11 refers to the effective use of land and states at paragraph 119 that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It states further at 120(c) that policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

- 5.14 Section 12 refers to well-designed places. Paragraph 130(c) states that *planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.*
- 5.15 paragraph 130(f) states that *planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*
- 5.16 Section 16 refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of a heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset (paras 199-203).

National Planning Practice Guidance

- 5.17 The National Planning Practice Guidance (NPPG) was launched in March 2012 as a web-based resource to bring together planning practice guidance for England in an accessible and usable way.
- 5.18 The NPPG sets out guidance on a wide range of topics including, but not limited to, the historic environment; design; the determination of applications; flood risk; health and well-being; housing; the natural environment; open space and local green space; planning obligations; transport; and planning conditions.
- 5.19 To conclude, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is located in an inherently sustainable site making the best use of land available. It is therefore, subject to the detailed consideration in section 6 of this statement and all other supporting documents, wholly in keeping with the concept of sustainable development detailed within the NPPF.

LOCAL PLANNING POLICY

- 5.20 For the purposes of this application, the adopted Development Plan for the London Borough of Camden comprises the London Plan (2021), the Local Plan (2017), the Kentish Town Neighbourhood Plan (2016) and the Camden Planning Guidance Documents.

London Plan 2021

- 5.21 The London Plan (2021) is the spatial development strategy for London. It recognises the pressing need for more homes in London in order to promote opportunity under policy H1 and identifies a need to take into account local context and character in optimising housing output.
- 5.22 Policy H15 refers specifically to purpose-built student accommodation and encourages student accommodation in locations well connected to local services by walking,

cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. In addition, the plan reiterates the importance that higher education makes to London's economy and labour market and the corresponding importance of ensuring adequate student housing is provided. It states at paragraph 4.15.1 that:

London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in PurposeBuilt Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.

5.23 It states further at paragraph 4.15.2:

The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified.

5.24 Other London Plan Policies of relevance to this application are:

- Policy GG1: Building Strong and Inclusive Communities
- Policy GG2: Making the Best Use of Land
- Policy GG4: Delivering the Homes Londoners Need
- Policy D1: London's Form, Character and Capacity for Growth
- Policy D3: Optimising Site Capacity Through the Design-Led Approach
- Policy D4: Delivering Good Design
- Policy D6: Housing Quality and Standards
- Policy D7: Accessible Housing
- Policy H1: Increasing Housing Supply
- Policy H15: Purpose Built Student Accommodation
- Policy HC1: Heritage Conservation and Growth
- Policy SI1: Improving Air Quality
- Policy SI2: Minimising Greenhouse Gas Emissions
- Policy T5: Cycling
- Policy T6: Car Parking
- Policy T6.1: Residential Parking

Camden Local Plan 2017

5.25 The Camden Local Plan sets out the Council's planning policies and covers the period from 2016-2031.

- 5.26 Policy H1 seeks to maximise the borough's housing supply by exceeding the target for additional housing and Policy H9 refers specifically to student housing stating that the *Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.*
- 5.27 The policy expands in stating that the council *will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year and will support the development of student housing* provided the development meets a number of criteria.
- 5.28 The local plan estimates that the minimum requirement for additional student housing over the Plan period to be 160 places per year, or 2,400 places in total. This minimum requirement forms the council's annual target set out in Policy H9. The plan also recognises that the growth in student numbers and student housing demand may be higher, and Policy H9 therefore supports development to meet or exceed the target.
- 5.29 Policy A1 aims to manage the impact of development in terms of residential amenity; transport impact and general community impacts. This covers a wide range of matters including visual privacy and outlook; sunlight, daylight and overshadowing; noise and vibration levels, odour impact, contaminated land etc.
- 5.30 Policy D1 seeks to ensure high quality design in all development and requires development to respect local character and the historic environment amongst a number of other criteria.
- 5.31 Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 5.32 Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 5.33 Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

Camden Planning Guidance Documents

- 5.34 Camden Planning Guidance (CPG) provides advice and information on how the Council will apply planning policies. The documents are largely linked to policies in the Local Plan and the following are relevant to the consideration of this application:

Access for all CPG (March 2019)

Amenity CPG (January 2021)

Design CPG (January 2021)

Energy Efficiency & Adaptation CPG (January 2021)

Housing CPG (January 2021)

Planning for Health & Well Being CPG (January 2021)
Student Housing CPG (March 2019)
Transport CPG (January 2021)

NEIGHBOURHOOD PLANNING

- 5.35 Once a Neighbourhood Plan has been agreed at a referendum and is made (brought into legal force) by the local planning authority, it becomes part of the local planning authority's development plan as an official development plan document which carries statutory weight. If a policy contained in the development plan for an area conflicts with another policy in a development plan, the conflict must be resolved by the decision maker in favour of the policy which is contained in the latest document to become part of the development plan.

Kentish Town Neighbourhood Plan 2016

- 5.36 The Council formally adopted the Kentish Town Neighbourhood Plan on 19 September 2016. The Plan is part of the statutory 'development plan' for the area and therefore should be used alongside the Council's own adopted planning documents when making decisions on planning applications in the neighbourhood area. The policies of the Neighbourhood Plan are largely in conformity with the Local Plan.

6. PLANNING ASSESSMENT

6.1 PRINCIPLE OF DEVELOPMENT

- 6.1.1 Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In terms of the principle of development, the planning history is a material consideration in determining the principle of development in this instance. Detailed consideration of specific impacts are discussed in the latter parts of this statement.
- 6.1.2 In order to accommodate Camden's growing population, the Local Plan makes clear that the Council needs to make the best use of the borough's limited land and resources and promotes the most efficient use of land in the borough.
- 6.1.3 The scheme is effectively an amalgamation of previously approved applications as set out in section 4 of this statement but with an additional, sensitively designed storey, to facilitate an additional 11 rooms; significantly reduced from the previous application of 42 and then 27 rooms.
- 6.1.4 In the most recently approved application, the council raised no objection to the principle of an increase in bed spaces, based largely on the principle having been established by extant permissions, consolidated by comments from the planning inspector in determining an earlier appeal:

(There is) no dispute that the site lies in a sustainable location for the proposed uses, one which is well served by public transport, including Kentish Town tube station and various bus routes. There is no objection in principle to the demolition of the Magnet buildings, and to their replacement by a more intensive form of development which makes fuller and more effective use of the site.

- 6.1.5 Given these comments, the council raised no objection to the principle of development, including PBSA not connected with any particular establishment of higher education.
- 6.1.6 Since the determination of the earlier applications and appeals there has been a fairly significant change in planning policy context with the introduction of the new NPPF and the adoption of new development plan documents. However, the general level of support afforded to student accommodation remains, provided of course that the number of students accommodated would not lead to an 'over-concentration' of accommodation and that housing projections are not significantly exceeded. In addition, the London Plan requires student accommodation to provide an element of affordable housing and these matters are discussed in more detail below.

Increase in Student Accommodation

- 6.1.7 The London Plan strategically sets out at paragraphs 4.15.1 and 4.15.2 that:

London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in PurposeBuilt Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.

The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified. Meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.

- 6.1.8 Firstly, in a borough wide context, Camden is home to 11 higher education institutions, including University College London (UCL), the School of Oriental and African Studies (SOAS), the London School of Hygiene and Tropical Medicine, Birkbeck and the University of London. Camden is home to the largest student population in London, with more than 26,500 higher education students resident in Camden, 54% of whom are from overseas. A third (33%) of students live in halls of residence or university properties; while 39% reside in the area south of Euston Road. The latest 'official' estimate of Camden's resident population is 253,400 at mid-2017. This is the nationally comparable population estimate required for government returns and nationally comparable performance indicators.
- 6.1.9 Census data from 2001 and 2011 also showed that the number of full-time students aged 18 and over who were usual residents in Camden (term-time) grew from 17,429 to 25,130, an increase of 44% and in the period since, the steady increase in student numbers remains unabated.
- 6.1.10 Based on the London Plan position, the Council are expected to ensure the provision of purpose-built student housing in Camden grows in line with the growth of full-time student numbers across London, and it is expected that the share of London's full-time 18+ students living in Camden will remain at around the same percentage. This approach would demonstrate compliance with London Plan Policy by ensuring the borough meets local needs and strategic needs in terms of growth across London.
- 6.1.11 The principle of a student accommodation building housing 417 students on this site was accepted in the appeal decision in December 2011. In the 2013 appeal the inspector stated that there is nothing in policy which sets a mandatory limit on student numbers in any given area, as the numerical limits in CPG2 were considered to be merely indicative (para 35). Thus, in determining a subsequent application, officers applied their judgement in concluding that an additional 22 bedspaces would not be harmful and permission was therefore granted for a scheme accommodating a total of 439 bedspaces.

6.1.12 In this instance, the development proposes an 11 room increase (total of **450 bed spaces**) which would accord with the principle of ensuring adequate accommodation is available for the gradually, and consistently increasing student population.

6.1.13 It is noted that, in the most recent appeal dismissal, no objections were raised to student accommodation in principle.

Over-Concentration of Student Accommodation

6.1.14 The Council appears to generally support the development of student accommodation provided it does not result in a harmful concentration of such uses in a local area or cause harm to residential amenity (Policy H9, clause j). The need to disperse student housing away from concentrated areas is in line with the London Plan and the Mayor's Housing SPG.

6.1.15 In a local context, more than a third of students in Camden live in the area south of Euston Road. The next highest proportion of students live in Regents Park Ward 20%, compared with 11.4% across the borough overall. The unevenly distributed concentration of student housing in the south of the borough was identified in a report on Student Housing in Camden (2009).

6.1.16 Since the 2013 appeal there has not been any significant change to the student numbers in Kentish Town relative to other wards or the borough average, with Kings Cross remaining around 4 times higher; Holborn & Covent Garden around twice as high; and Kentish Town below the borough total.

6.1.17 At the 2011 appeal the inspector concluded that the scheme (**417 bed spaces**) would not result in an intensification of student accommodation but would redress the social balance in the area by bringing the proportion of students in Kentish Town up to the Borough average.

6.1.18 In the 2013 appeal the inspector stated that there is nothing in policy which sets a mandatory limit on student numbers in any given area, as the numerical limits in CPG2 were considered to be merely indicative (para 35) and concluded that the *important question of over-concentration was (and remains) therefore a matter of balanced judgement*. In his judgement on that occasion, he tentatively concluded that the 133-student increase (**550 bed spaces**) might just amount to an undesirable over-concentration but gave no indication of how this could be measured or where the threshold was and was very much uncertain in his conclusions.

6.1.19 Thus, in determining a subsequent application, officers applied their judgement in concluding that an additional 22 bed spaces would not be harmful nor lead to an over-concentration and permission was therefore granted for a scheme accommodating a total of **439 bed spaces**. By proxy, the same balanced approach must be applied to the current proposals providing for an additional 11 bed spaces.

6.1.20 The Local Plan recognises the importance in creating mixed, inclusive and sustainable communities. In some parts of Camden high concentrations of student accommodation can impact negatively on mixed and inclusive communities, and such concentrations are located in the south of the borough not in Kentish Town. Without a quantifiable policy, the assessment of 'over-concentration' can only therefore be based on the associated planning history of the site, usefully presided by planning inspectors; and local and borough wide circumstances.

6.1.21 In this instance, a further increase of 11 bed spaces (to **450 bed spaces**) remains well below the 550-space scheme tentatively dismissed by the planning inspector in the 2013 appeal. The increase would redress the social balance in the area by maintaining the proportion of students in Kentish Town with the Borough average and in any case, could not be considered to be significant enough to result in an over-concentration.

6.1.22 The modest increase in student accommodation would act to reduce the pressure on existing private rented stock and to conclude on these matters, the Inspectors comment in dismissing the 2013 appeal for (550 spaces) that *it is impossible to say categorically whether the proposed increase in student numbers would bring about a harmful over-concentration* would warrant an approval of a significantly lower figure.

6.2 IMPACT ON RESIDENTIAL AMENITY

6.2.1 The principle matters discussed above, and in particular the issue of over-concentration, is to some extent linked to the impact on the local resident population.

6.2.2 The characteristics of 'studentification' have been much studied, mainly in university towns with significant local concentrations of students. The previously refused application by the council (for 550 bed spaces) raised concerns, echoed by some local objectors, about the potential for increased noise and disturbance within the area - albeit one of mixed use, as opposed to one which is predominantly residential in character - arising from and associated with a student lifestyle. This, stated the Inspector in dealing with the appeal, *includes recreation and general comings and goings at unsocial hours, occasional inebriation in the street, and other manifestations of (for want of a better umbrella term) youthful exuberance.*

6.2.3 The Inspector was in little doubt that there would be more occasions or events of noise and disturbance locally, arising from the effects of the aforementioned student exuberance, and this would be likely to provoke more complaints from the general public living in the area. In raising this, the Inspector acknowledged that it need not be decisive to the determination of that appeal but appeared to suggest, given his tentative (and somewhat uncertain) articulation of harm, that the 550 bed-scheme represented a marginal tipping point at which the line should be drawn.

6.2.4 In considering the earlier appeal in 2011, the Planning Inspector stated that noise issues appeared to be *isolated or assumptions*; that the area was not a quiet suburban residential area; and that in this mixed-use urban location, residents could reasonably expect some degree of noise. At that time, the applicant carried out a noise impact assessment of the existing students and the inspector agreed that 90% of the noise

incidences were not from students. The inspector also referred to the fact that the managers at Mary Brancker house had prevented the use of a roof terrace by students due to noise issues and evicted a student causing noise problems and concluded that a Student Management Plan could deal with similar issues on this site.

- 6.2.5 So while it is inevitable that general levels of noise and disturbance might be heightened by the presence of student accommodation, this is an existing land use which represents a positive economic benefit. The key consideration in this instance is the difference in impact between a 439-bed scheme and a 450-bed scheme which, it is considered, would be imperceptible, particularly in light of the comments noted above.
- 6.2.6 In addition, the section 106 legal agreement relating to the original application contained an obligation on the developer to submit a draft student management plan. The obligation requires a plan to set out a package of measures, following appropriate consultation with the local community, to ensure the behaviour of students both on, and in the vicinity of the property. This obligation will be carried over to this application should planning permission be granted.
- 6.2.7 Finally, in dismissing the recent appeals for a 42 and 27 bed schemes, the Inspector raised no concerns about general noise and disturbance. His main concerns in the most recent decision was with regard to the outlook of the occupiers of 55-57 Holmes Road.

Sense of enclosure / overbearing impact

- 6.2.8 The Council and the Planning Inspector have previously raised concerns regarding 2 buildings in particular, which are close to the application site; 74 Holmes Road, on the opposite side of the road to the north and 55-57 Holmes Road, which is on the same side but further east, following a turn in the road. No 74 has a number of south facing flats featuring balcony areas that look out onto the application site opposite but in the most recent appeal decision the Inspector stated the following:

Some of the flats on the opposite side of Holmes Road at No 74 are single aspect and have openings directly facing the appeal site. However, because the proposal would be behind the façade of the building, it would be obscured from view from the lower units. The angle of vision means that the proposed extension would be apparent from within upper flats but it would be well above eye level and recessive. The road is not wide but the proposed extension would be far enough away to avoid an undue sense of enclosure. The photographic evidence from those living at No 74 indicates that their outlook is dominated by the existing building. But even taking account of the cumulative effects the proposal, by reason of its position and height, would not detract from the internal environment of the flats at No 74.

- 6.2.9 In this case, the proposed extension reduces the scale and form of development which was the subject of the above appeal inspector's decision. Therefore, the conclusion should be the same; that being that there would be no discernible impact on no.74.

6.2.10 In terms of the impact on 55-57 the Inspector commented as follows:

The proposed extension would be offset from the main orientation of the south-west facing flats at 55-57 Holmes Road. Whilst these properties have windows and balconies those on the upper levels which might be most affected by a seventh floor addition are positioned to the south-east away from the proposal. However, there are windows and balconies on the west side of Nos 55-57 which would be directly facing the northern end of the proposed extension. At this point it would be located up to the edge of the existing building. The adjoining windows would be facing directly towards this part of the proposal at fairly close quarters. Consequently, occupiers would experience an adverse visual impact which would be detrimental to their outlook.

6.2.11 In this case, it is noted the windows and balconies on the west side of no.55-57 are secondary; the property is dual aspect and is served by windows and balconies on its north and south elevations. In any case, the scheme has been further amended to ensure the proposed structure is not visible, or at the very least has no discernible impact on the outlook and setting of the terrace space (see para 3.3 of Design Statement that supports the application).

6.2.12 The additional floor of accommodation has been significantly reduced in scale to accommodate these concerns. The floor would now be set back from both the front and rear elevations of the existing building which would serve to reduce the visual presence of the structure from the perspective of the neighbouring properties. In addition, the setback would ensure that direct overlooking would not be possible.

Daylight / sunlight

6.2.13 An amended daylight and sunlight study has been submitted in support of the application. The study is based on the various numerical tests laid down in the Building Research Establishment (BRE) guide 'Site Layout Planning for Daylight and Sunlight: a guide to good practice, 2nd Edition' by P J Littlefair 2011.

6.2.14 The study assesses the impact of the development on the light receivable by the neighbouring properties at 1 to 15 & 16 to 30 Azania Mews and 54 to 74, 55 to 57, 61 to 63, 65 to 67, 74a to 74c, 76, 78 Holmes Road & 87 Holmes Road.

6.2.15 All neighbouring windows (that have a requirement for daylight or sunlight) pass the relevant BRE diffuse daylight and direct sunlight tests. The development also passes the BRE overshadowing to gardens and open spaces test.

6.2.16 In summary, the numerical results in the study demonstrate that the proposed development will have a low impact on the light receivable by its neighbouring properties. The proposed development therefore sufficiently safeguards the daylight and sunlight amenity of the neighbouring properties. For full details please refer to the supporting daylight and sunlight study.

6.3 STANDARD OF STUDENT ACCOMMODATION

Room sizes

- 6.3.1 The additional 11 rooms will be single occupancy rooms each measuring between 17-20sqm.
- 6.3.2 As previously recognised by the council, the overall size of these units would be less than the suggested minimum in the Camden Planning Guidance for a 1-person unit. However, as the proposals would provide student accommodation and not private residential accommodation this was considered to be acceptable. The units will only be occupied by students in full or part-time higher education and this will form a clause in the section 106 legal agreement.
- 6.3.3 This was similarly considered acceptable by the planning inspector in dismissing a recent appeal when he stated:

The appellant has suggested that the proposal would indeed contribute to another objective, that of delivering the unmet demand for student accommodation and that as a result of this tenure that regulations relating to licensed Houses in Multiple Occupation would be more contextually appropriate in assessing room sizes. With this in mind, whilst the proposal does not meet the NDSS, it does exceed the standard set out in the Licensing of Houses in Multiple Occupation Regulations 2018. Furthermore, when taking into account that there would also be over 1700 m sq of floorspace provided in the building for communal facilities for the occupiers to use, I find that the floor areas of the accommodation rooms to be provided would be acceptable in this instance.

- 6.3.4 The range and mix of units across the remainder of the building are unchanged and in light of the above, there is no reason to question the size of the accommodation.

Ceiling heights

- 6.3.5 In terms of ceiling heights, the NDSS sets a minimum requirement of 2.3m. The London Plan strongly recommends that this distance is increased to 2.5m, however, in order to address the increased temperatures that are regularly experienced and the distinct density and flatted nature of many of its residential developments. This ensures that adequate levels of light, ventilation and a sense of space are achieved. Consequently, the Council previously raised concerns that the living conditions of occupiers would be harmed as a result of the sloping roof design of the extension, which would result in over 35% of the gross internal area of the rooms having less than 2.3 m height in which to stand. This was a view that was shared by the Planning Inspector in dismissing a recent appeal.
- 6.3.6 As a result, the scheme was been reduced in overall mass but amended in design to allow a flat roof across the entirety of the development. This will provide an internal floor to ceiling height of 2.5 metres across the whole of the proposed floor and was considered acceptable in the most recent appeal. In amenity terms, this exceeds the

minimum standards and therefore provides an adequate standard of amenity and has therefore been repeated as part of the current application.

Outlook

- 6.3.7 Concerns were previously raised by both the council and the Inspector about the combination of the single aspect of the rooms and the fact their windows were positioned behind the mesh over cladding panels which were to be used on the uppermost parts of the building.
- 6.3.8 Accordingly, the cladding panels have been removed from the windows as part of the re-design process. This is largely achieved through the setback of the structure, ensuring that screening measures are not necessary and ensuring that the concerns previously raised are addressed. Each of the bedrooms would benefit from unobstructed outlook and therefore, the proposal accords with development plan principles on the quality of accommodation.

6.4 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

- 6.4.1 Section 12 of the NPPF refers to well-designed places. Paragraph 130(c) states that *planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.*
- 6.4.2 Policy D1 of the local plan provides further detail on local requirements and, importantly, states that the council will require that development respects local character and context, guidance that is consolidated by Camden Planning Guidance on Design.
- 6.4.3 The proposed development does not depart from the lawful use of the site and the main issue relating to impact would therefore be limited to design and appearance. In this regard, the application is supported with a Design and Access Statement which provides detail of the architectural evolution of the scheme and its impact on the surroundings, concluding that the extension is sympathetically designed, responding to site character and context.
- 6.4.4 In particular, the Cathcart Street elevation has been set further back, reducing its presence and its impact significantly. Please refer to the Design and Access Statement for full details.

6.5 HERITAGE IMPACT

- 6.5.1 Case law dictates that decision makers are required to give *great weight* to any harm to the significance of a heritage asset and how this should be applied is set out under section 16 of the NPPF. This refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of a heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.

- 6.5.2 In respect of the design considered in its own right, and the relationship between the proposed development and its surroundings, the effect will be positive. The proposed development will enhance the quality of the townscape of the area which, it is noted, is of far less historic/architectural importance than the adjacent conservation area. Indeed, the extended roof level will only be visible from the conservation area in transient form and there would be no effect on the setting of any listed buildings. The proposed development would therefore have a neutral impact on heritage assets.

6.6 HIGHWAYS IMPACT

- 6.6.1 The Transport Statement previously submitted in support of the application for 27 single bedrooms concluded that the change in rooms would result in an increase of approximately 120 additional two-way person trips each day. The majority of these movements would be undertaken by public transport, with the remainder undertaken by walking and cycling. No movements will be undertaken by car due to the car-free nature of the development on an average day.
- 6.6.2 The proposals for the increase in student accommodation will result in no increase in servicing trips over and above those already taking place in connection with the extant use of the site.
- 6.6.3 The car-free nature of the development in combination with the infrastructure on site and the student travel plan will assist in encouraging the use of sustainable modes of travel by residents of the site; whilst the 'Student Drop-Off and Pick-Up Scheme' will manage the drop-off and collection of students at key times of the year i.e. during the start and end of term.
- 6.6.4 In light of the above, it can be concluded that the proposed increase in student accommodation in the form of an extension to the seventh floor will have no material, significant or detrimental impact either on the surrounding highway network or on the local public transport network. Consequently, there are no evident transport related reasons why planning permission for the proposed development should not be granted.
- 6.6.5 Please refer to the Transport Statement and Travel Plan that accompany the application for full details.

6.7 SUSTAINABILITY

- 6.7.1 The application is supported with an Energy Statement which demonstrates that the proposed seventh floor development is sustainable, as measured against relevant local, regional and national planning policies.
- 6.7.2 A range of energy efficiency (*Be Lean*) measures are proposed to enable the development to meet Part L 2013 Target Emissions Rate (TER). This represents a good level of sustainable design and construction and demonstrates the Applicant's

commitment to reducing energy demands of the proposed added floor. Please refer to the Energy & Sustainability Statement for full details.

6.8 CONSTRUCTION MANAGEMENT

- 6.8.1 The section 106 legal agreement pertaining to the original application contained an obligation on the developer to submit a Construction Management Plan setting out the measures that were to be adopted in undertaking the construction of the development using good site practices. The approved Construction Management Plan will be adopted in this instance should planning permission be granted and this can similarly be secured, either through a planning condition or a section 106 legal agreement.

7. SUMMARY & CONCLUSION

- 7.1 In providing much needed student accommodation, the proposed development will optimise the use of this sustainable brownfield site, supporting the local economy and Camden as a centre for higher education.
- 7.2 At the 2011 appeal the inspector concluded that the scheme would not result in an intensification of student accommodation but would redress the social balance in the area by bringing the proportion of students in Kentish Town up to the Borough average. At the 2013 appeal the inspector concluded that the 133-student increase might just amount to an undesirable over-concentration but gave no indication of how this could be measured or where the threshold was. Since the 2013 appeal there has not been any significant change to the student numbers in Kentish Town relative to other wards or the borough average, with Kings Cross remaining around 4 times higher; Holborn & Covent Garden around twice as high; and Kentish Town below the borough total. It is therefore considered that the 11 student room increase will similarly redress the borough average, in accord with the principles of the development plan.
- 7.3 The proposed development is a high quality, site specific response that will sit comfortably within the confines of the existing built envelope, articulating the existing elevations of the building with homogenous form with simple detailing to integrate with the existing architectural language.
- 7.4 The proposed development would accord with the general principles of the National Planning Policy Framework. The site is located within an inherently sustainable location in close proximity to existing public transport services and is consistent with the objectives of the new NPPF and the development plan. The site will contribute to the creation of a socially inclusive community while synchronising the supply of student housing with demand.
- 7.5 Careful consideration has to be given to the nature of the site including its relationship to its immediate surroundings, and the amenities of neighbouring occupiers. The proposed development has been re-designed in the context of the most recently dismissed appeal with all matters addressed through the re-design. There is no doubt that a high-quality development will make an effective use of this site and respond to its townscape.
- 7.6 In summary, the proposed development fulfils the three dimensions of sustainable development as defined by the NPPF and therefore the presumption in favour of sustainable development applies. The proposal is fully in accordance with national and local planning policy providing a scheme that contributes towards the provision of the overall supply of housing.
- 7.7 This Planning Statement should be read alongside the other supporting documentation and drawings which have been submitted as part of the Full Planning Application.