

PLANNING STATEMENT

**FROGNAL HOUSE
99 FROGNAL
LONDON
NW3 6XR**



December 2023

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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by SM Planning in support of an application seeking full planning permission and listed building consent for the change of use of a convent to a single dwelling house and associated works (Use Class C3) and the erection of three (3x) dwelling houses (Use Class C3) at Frognal House, 99 Frognal, London, NW3 6XR.
- 1.2 This statement sets out the planning justification for the proposed development and assesses the proposal against the development plan taking into account any material considerations including national planning policy. The document should be read in conjunction with all other supporting documentation.

2. SITE & SURROUNDING CONTEXT

- 2.1 In terms of context the 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 site is located within the administrative ward of Frognal & Fitzjohns.
- 2.2 The site is located on the west side of Frognal and comprises a part 1, 2 and 3 storey (plus basement) grade II listed property that is currently occupied for residential purposes and has, in the past, been used as a hostel and convent, albeit, the property historically operated as a single dwellinghouse. The property has been unsympathetically extended to the rear and side in the 1970s.
- 2.3 The site is located within the Hampstead Conservation Area. This is a substantial conservation area stretching beyond Hampstead village to encompass not only its urban form but the wider expanse of open space beyond its built-up boundaries. There are numerous sub-areas with a combination of characteristics, contrasting between the dense urban heart of Hampstead and the spaciousness of its outer areas. The conservation area and the wider administrative ward of Frognal & Fitzjohns lies to the west of Hampstead Village and is overwhelmingly residential in character sharing a distinctive red brick architecture typical of the mid-19th century.
- 2.4 The site is located approx. 285m from Hampstead tube station and within 700m from numerous services and facilities along Hampstead High Street and Heath Street. The site has a PTAL (Public Transport Accessibility Level) Rating of 2.



3 PRE-APPLICATION ENGAGEMENT

- 3.1 The NPPF states that *'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community'*.
- 3.2 The Applicant consulted with the local planning authority throughout the drafting of this application in order to inform, identify and, where appropriate, address any issues or concerns throughout the preapplication period through to the submission of the application.
- 3.3 This engagement has been managed through targeted pre-application advice meetings with The London Borough of Camden. Over the course of these pre-application enquiries, the scheme has been amended to address the issues raised within the LPA's pre-application responses. A summary of the applicant's programme of pre-application engagement is provided below:

Camden Pre-Application Service Pre-Application 1 (2021/4613/PRE)

- 3.4 The Applicant submitted a request for formal pre-application advice in September 2021 (Pre-Application 1) which sought advice on proposals to change the use of the property to a single self-contained residential home. In addition, advice was sought on the principle of the demolition of the rear extensions and their replacement with more sensitively designed additions. It is noted that this pre-application submission was lodged prior to the instruction of the full design team. As part of this service, a pre-application response was provided by Camden in October 2021.
- 3.5 The response covered the key principles of the change of use and development proposals, including:
- Land Use.
 - Conservation and Design.
 - Affordable Housing.
 - Standard of Residential Accommodation.
 - Transport Impact.

Pre-Application 2 (2022/3037/PRE)

- 3.6 In order to pro-actively engage with the Council further, a second pre-application submission was lodged in July 2022 seeking more detailed advice on the design and scope of demolition/extension and as a part of the pre-application submission, several addendum notes were prepared during the processing of the application in order to provide Camden with sufficient information. It is noted that at the point of this submission, the full design team had been instructed so the submission was not only

based on the feedback received during pre-application 1 but was framed around a detailed heritage appraisal and comprehensive architectural and landscaping proposals that were appropriately developed and carefully tested.

3.7 The response covered the key principles of development proposals, including:

- Change of use Principle.
- Design and Heritage.
- Basement Considerations.
- Quality of Accommodation.
- Unit Mix.
- Neighbouring amenity.
- Transport.
- Energy and sustainability.
- Trees.
- Air quality.
- Community Infrastructure Levy

3.8 The pre-application response provided a range of comments on each of the detailed considerations above. The key aspects to that response can be summarised as follows:

- The general principle of a change of use to C3 residential use was considered acceptable provided residential floorspace is maintained.
- Following a detailed study of the existing floorspace, it was accepted that the provision of 12-16 homes in this location, to offset any perceived loss of student accommodation, would not be possible.
- The provision of four units on the site (including the main house) was welcomed but further justification would need to be provided as to why additional units could not be provided.
- It was suggested that an overall reduction in floorspace should be explored although it was acknowledged that this would need to be considered in the balancing exercise of heritage benefit.
- The demolition of the extension was considered to be acceptable in principle although this would need to be considered against sustainability requirements and an appropriate landscaping scheme.
- It was considered that the proposed extension will read as contrasting and subservient to the main house and was largely supported although additional comments were made with regard to the projection at its south-western extremity and the need for this to be drawn back and recessed away from the house.

- Further work was considered to be necessary with regard to the mansard extension, internal alterations and the extent of glazing proposed.

3.9 The Council welcomed any ability to provide new residential accommodation on the site as part of its key strategic policy objectives.

Pre-Application 3 (2023/2120/PRE)

3.10 In April 2023, a third pre-application submission was lodged with Camden. This follow-up meeting specifically discussed the merits of the proposed mansard extension and the additional housing provision. Multiple options were discussed over a series of meetings in both regards, in terms of design, scale, massing, and siting.

3.11 Over those series of meetings, the council provided a range of comments on the merits of the scheme and the key aspects to those responses can be summarised as follows:

- It was re-iterated that a change of use for residential purposes was considered acceptable in principle.
- It was similarly accepted that a total of 4 units on site (including the main house) was the correctly struck balance.
- Affordable housing provision would not be required to be provided on site.
- Active cooling would not be accepted in principle.
- The demolition of the 1970s extension would need to be justified in sustainability terms.
- A mansard roof extension was considered acceptable in principle, subject to final design/appearance.
- New homes to the north of the site will need to be carefully tested for daylight/sunlight/outlook etc. but locationally accepted in principle.
- The replacement of the rear glazed stair tower accepted in principle.
- In terms of internal alterations, a methodology will be required for retro-fitting measures.

3.13 Overall, extensive consultation has taken place during pre-application discussions providing the opportunity for the LPA to participate in the design evolution of the scheme. It provided the opportunity to feedback and inform the proposal's development, as well as directly influence the design of the proposals.

4 THE PROPOSED DEVELOPMENT

- 4.1 Full planning permission and listed building consent is sought for the change of use of the convent to a single dwellinghouse and associated conversion works (Use Class C3) and the erection of three (3x) dwelling houses (Use Class C3).
- 4.2 The proposed scheme is for a full refurbishment and renovation of the building alongside a new mansard roof and rear extension to replace the existing 1970s accommodation block which will preserve and enhance the setting of the listed building and wider conservation area.
- 4.3 The new residential units will be created in the northern section of the site. Two of these will be in a detached building, situated where the current garage is, and a further unit will be attached to the northern elevation of the proposed rear extension to the main house.

5 PLANNING HISTORY

- 5.1 The site was originally in private residential use, highlighted by a planning permission from 19 September 1968 (ref: 5631) which granted permission for the change of use from residential to convent and hostel.
- 5.2 Thereafter, several planning permissions were granted for the extension of the building, some of which significantly and demonstrably affect the setting of the listed building, most notably the rear wing to the west of the main house.
- 5.3 On 08 May 1971, full planning permission was granted for the erection of a part one and part two storey extension under application reference HB243.
- 5.4 On 22 June 1973, full planning permission was refused for the erection of an extension to the two-storey dormitory under application reference 16106.
- 5.5 On 09 August 1983, full planning permission and listed building consent were granted for the erection of a first-floor extension under application reference HB3165.
- 5.6 On 07 August 2019, listed building consent was granted for the replacement of the rear roof of the lightwell at ground floor under application reference 2019/2838/L.
- 5.7 On 21 July 2021, listed building consent was granted for the erection of a plaque commemorating the award of the Croix de la Liberation by General Charles de Gaulle to the head of the French resistance in 1943 under application reference 2021/2208/L.

6 PLANNING POLICY CONTEXT

- 6.1 This Section provides an overview of national and local planning policy relevant to the determination of the planning and listed building consent applications, as well as any other relevant national or local planning guidance.

LEGISLATION

Planning and Compulsory Purchase Act 2004

- 6.2 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.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 6.3 Section 66 states *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or of any features of special architectural or historic interest which it possesses'*.
- 6.4 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.

NATIONAL PLANNING POLICY

National Planning Policy Framework (2021)

- 6.5 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.
- 6.6 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.
- 6.7 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.*
- 6.8 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.
- 6.9 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.
- 6.10 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.*
- 6.11 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.
- 6.12 Paragraph 69 states that *‘small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly’*.
- 6.13 Section 8 refers to the promotion of healthy and safe communities and states at paragraph 92 that planning policies should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.
- 6.14 Section 9 refers to promoting sustainable transport and at paragraph 104 states that *‘transport issues should be considered from the earliest stages of development proposals, so that; opportunities from existing or proposed transport infrastructure are realised and opportunities to promote walking, cycling and public transport use are identified and pursued’*.

- 6.15 Paragraph 105 advises that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 6.16 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.
- 6.17 Section 12 refers to well-designed places. Paragraph 130(a) states that development should function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development whilst paragraph 130(b) states that developments should be *visually attractive as a result of good architecture, layout and appropriate and effective landscaping*. Further, 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.
- 6.18 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.
- 6.19 Paragraph 132 states that design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.
- 6.20 Section 14 refers to climate change and flooding. Paragraph 154 states that new development should be planned in ways that (a) avoid increased vulnerability to the range of impacts arising from climate change with care taken to ensure that risks can be managed through suitable adaption measures, including through the planning of green infrastructure, and (b) to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 6.21 Paragraph 159 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.
- 6.22 Section 15 refers to conserving and enhancing the natural environment. Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural environment by protecting sites of biodiversity value, minimising impacts on and providing net gains for biodiversity and preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

- 6.23 Section 16 refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of heritage assets, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset (paragraphs 194-198).

National Planning Practice Guidance

- 6.24 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.
- 6.25 The NPPG sets out guidance on a wide range of topics including, but not limited to, design; the determination of applications; design; flood risk; health and well-being; housing; the natural environment; the historic environment; planning obligations; transport; and planning conditions.
- 6.26 To conclude, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is sited in an inherently sustainable location making the best use of land available. It is, therefore, subject to the detailed consideration in section 7 of this statement and all other supporting documents, wholly in keeping with the concept of sustainable development detailed within the NPPF.

LOCAL PLANNING POLICY

- 6.27 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 Hampstead Neighbourhood Plan (2018) and the Camden Planning Guidance Documents.

London Plan 2021

- 6.28 The London Plan is the spatial development strategy for London. It recognises the pressing need for more homes in London in order to promote opportunity and identifies a need to take into account local context and character in optimising housing output.
- 6.29 The Plan requires that housing development schemes provide for a mixed and balanced community and provide good standards of amenity in accordance with minimum space standards.
- 6.30 The Plan requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 6.31 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 D10: Basement development
- Policy D14: Noise
- Policy H1: Increasing housing supply
- Policy H2: Small sites
- Policy H4: Delivering affordable housing
- Policy H8: Loss of existing housing and redevelopment
- Policy HC1: Heritage conservation and growth
- Policy G7: Trees and woodland
- Policy SI1: Improving air quality
- Policy SI2: Minimising greenhouse gas emissions
- Policy T4: Assessing transport impacts
- Policy T5: Cycle parking
- Policy T6: Car parking
- Policy T7: Deliveries, servicing and construction

Camden Local Plan 2017

- 6.32 The Camden Local Plan sets out the Council's planning policies used for the determination of planning applications for development in the borough and provides the overarching local policy framework for delivering sustainable development and covers the period from 2016-2031.
- 6.33 Policy H1 seeks to maximise the borough's housing supply by exceeding the target for additional housing and Policy H4 seeks to maximise the supply of affordable housing, expecting a contribution to affordable housing from all developments of one or more additional homes.
- 6.34 Policy H3 seeks to protect all existing housing floorspace, stating that proposals resulting in its loss will be resisted.
- 6.35 Policy H6 aims to minimise social polarisation in creating mixed, inclusive and sustainable communities by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size and any particular housing needs.
- 6.36 Policy H7 seeks a mix of dwelling sizes where self-contained housing is proposed.
- 6.37 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.

- 6.38 Policy A5 states that the Council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of the area; and the significance of heritage assets.
- 6.39 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.
- 6.40 Policy D2 refers to heritage and states that the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings, including conservation areas. It states further that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 6.41 Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.42 Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 6.43 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:
- Amenity CPG
 - Basements CPG
 - Design CPG
 - Developer Contributions CPG
 - Energy Efficiency and Adaptation CPG
 - Home Improvements CPG
 - Housing CPG
 - Transport CPG

NEIGHBOURHOOD PLANNING

- 6.44 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.

Hampstead Neighbourhood Plan 2018

6.45 The main aim of the Hampstead Neighbourhood Plan is to promote Hampstead's future as a lively and contemporary neighbourhood with exceptional heritage and unique open spaces. The proposed vision is to conserve and foster Hampstead's charm and liveability by protecting the distinctive character of buildings and open spaces, the Heath, healthy living, community spirit and the local economy.

6.46 Policies relevant to the consideration of this application include,

- Policy DH1: Design
- Policy DH2: Conservation Areas & Listed Buildings
- Policy NE2: Trees
- Policy BA1: Basement Impact Assessments
- Policy TT4: Cycle & Car Ownership
- Policy HC1: Housing Mix

7 PLANNING ASSESSMENT

7.1 PRINCIPLE OF DEVELOPMENT

7.1.1 Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The application proposes the change of use of the convent to a single dwellinghouse and associated conversion works (Use Class C3), the erection of three (3x) dwelling houses (Use Class C3) and a new mansard roof and rear extension to replace the existing unsympathetic 1970s accommodation block.

7.1.2 Housing development is compatible with existing land uses in the surrounding area, and the site, for the purposes of planning law, is defined as previously developed land. In such locations, there are no development plan or national planning policies that restrict the extension or change of use of buildings in principle. Where detailed matters will be considered in the latter parts of this statement, dealing specifically with matters of principle, the key determinative matters are therefore;

- A. Housing land supply
- B. The loss of existing accommodation & the quantum of new residential use
- C. The demolition of the 1970s extension

A. Housing land supply

7.1.3 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. The local plan highlights housing as the borough's priority land use which accords with the government's objective of significantly boosting the supply of housing, as set out in the NPPF.

7.1.4 The existing site was traditionally used as a single dwellinghouse and latterly by the nuns of St Dorothy, as accommodation to support students travelling from abroad. The proposed development in this instance will result in the net increase of conventional residential accommodation.

7.1.5 The application site is located in close proximity to transport links and a number and range of local services and opportunities. The site is therefore inherently sustainable and its development for residential purposes would accord with the principles of the NPPF which outlines a presumption in favour of sustainable development; guidance which is echoed in the development plan.

7.1.6 In addition, Policy H2 of the London Plan, requires that small sites play a much greater role in housing delivery and boroughs should pro-actively support well designed new homes on small sites. Small sites relate to those below 0.25 hectares in size. The proposed development would accord with the principles and the intent of this policy

and therefore, in light of the above comments, and subject to the consideration of all other matters, the proposed development is considered to be strategically acceptable in principle with regard to the provision of housing.

- 7.1.7 This conclusion was echoed in pre-application engagement with the Council which supported the provision of housing at the quantum proposed. To that effect, it is noted that the pre-application response explicitly states:

The principle of the development and changing the use of the convent to a residential site is considered acceptable providing that residential floor space is maintained on site.

The previous proposal provided 4 units (including the main dwelling house) which was considered the acceptable amount for the site in relation to balancing with the heritage issues. Information has also been submitted justifying that more units cannot go on site which is accepted.

B. The loss of existing accommodation & the quantum of new residential use

- 7.1.8 It is the preference of the applicant to revert the use of the property back to a single residence. To clarify, the applicant would prefer to not provide additional housing beyond a single residence.

- 7.1.9 However, pre-application discussions with the council determined that additional housing would need to be provided on the basis that the former use of the site as student accommodation would be considered as a 'loss of accommodation'.

- 7.1.10 The site has historically been occupied by student accommodation. This has been confirmed by the previous owners of the site through a 'statement of truth' and has been evidenced in supporting information that supported earlier lawful development certificate applications. This has been further referenced by Camden officers during the processing and consideration of all recent applications. The local plan makes specific reference to student housing at Policy H9. It nevertheless caveats its use with commentary at paragraph 3.264 of the local plan which states:

Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, we will assess proposals involving its loss on the basis of Policy H10 Housing with shared facilities ('houses in multiple occupation') rather than Policy H9.

- 7.1.11 In this case, the accommodation was restricted to students during term times only and the appropriate policy mechanism to apply is Policy H9.

- 7.1.12 The key aspects to Policy H9 read as follows:

We will resist development that involves the net loss of student housing unless either:

k. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or

l. adequate replacement accommodation will be provided that satisfies criteria (a) to (j) above;

m. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect it to create an equivalent amount of floorspace in another permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing, having regard to Policy H4.

7.1.13 The existing accommodation is incapable of meeting contemporary standards or expectations for student housing. This can be substantiated by the fact the accommodation, in the majority of instances, does not meet either local or national space standards.

7.1.14 To that effect, it is noted that Camden Council's 'Student Housing' (Camden Planning Guidance) dated March 2019 sets out the space standards for student rooms. The relevant size for a single sleeping room is 9m². The following table demonstrates that only 4 of the rooms currently meet Camden's space standards for student accommodation.

Room	Area (Sq m)
1	10.25
2	6.27
3	5.65
4	10.6
5	5.44
6	5.73
7	8.34
8	5.92
9	5.94
10	5.93
11	5.96
12	5.94
13	6
14	5.92
15	5.99
16	5.93
17	5.89
18	5.82
19	5.9
20	5.81
21	5.83
22	5.86
23	5.9
24	5.87
25	11.12
26	6.83
27	7.69
28	9.01
29	6.6
30	8.53

7.1.15 In addition to the above, the adopted national minimum space standards for rooms in HMOs – which include student housing - used as ‘sleeping accommodation’, sets out that from October 2018, landlords cannot let out rooms below 6.51m² to single adults and rooms below 10.22m² cannot be let to two adults. The table below demonstrates that only 9 of the student rooms would be legally lettable.

Room	Area (Sq m)
1	10.25
2	6.27
3	5.65
4	10.6
5	5.44
6	5.73
7	8.34
8	5.92
9	5.94
10	5.93
11	5.96
12	5.94
13	6
14	5.92
15	5.99
16	5.93
17	5.89
18	5.82
19	5.9
20	5.81
21	5.83
22	5.86
23	5.9
24	5.87
25	11.12
26	6.83
27	7.69
28	9.01
29	6.6
30	8.53

7.1.16 All 17 of the rooms on the first floor of the post-war block are significantly under Camden’s requirement of 9m². They are also all under the legal requirement of 6.51m² meaning the owner would not legally be allowed to let them out to students.

7.1.17 If the existing partition walls were removed and new partition walls constructed around the existing window openings to create student rooms that meet Camden’s requirement of 9m² rooms this space would provide 9 student rooms. This is the most amount of rooms that could be reasonably accommodated within the constraints of the existing building.

7.1.18 Notwithstanding the above, even where an alternative conclusion were reached, the accommodation is in any case no longer required because the institution it served no longer exists.

7.1.19 Attention is thereafter drawn to the final part of the policy which requires an *equivalent amount of floorspace to be in another permanent housing use* to be provided. In this case, the proposal for a single self-contained residential use would align with this requirement.

7.1.20 Nevertheless, in order to support Camden’s housing supply and identified land use principle, the applicant is willing to provide additional units of accommodation on site

as per the advice provided during pre-application discussions. This identifies that 2no. 1b1p homes over a single storey (38m²) and 1no. 2b3p home over two storeys are proposed in addition to the main house and this would essentially create 4 policy compliant homes in total, significantly supporting Camden land use priority while maintaining the fabric and setting of the listed building/conservation area.

7.1.21 This approach to residential quantum was supported in the extensive pre-application discussions with the council (please refer to 7.1.7).

C. The demolition of the 1970s extension

7.1.22 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 in 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 the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.

7.1.23 If the application would cause *substantial* harm, paragraph 195 sets out that consent should be refused unless it can be demonstrated that the substantial harm or loss is *necessary* to achieve substantial public benefits that outweigh that harm.

7.1.24 If the application would cause *less than substantial* harm paragraph 196 requires that the harm should be weighed against the public benefits of the proposal. Paragraph 197 requires that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

7.1.25 The heritage assets in this instance are comprised of the Hampstead Conservation Area and the listed building itself (both designated). The impact on the significance of the heritage assets is assessed in detail in the latter part of this statement (at section 7.7) and in the accompanying Heritage and Design & Access Statements.

7.1.26 However, for the purposes of establishing the principle of demolition it is noted that those sections conclude that the harm to the heritage assets is entirely 'positive' as a result of the unsympathetic nature of the 1970s extension. The application in this instance therefore provides a significant and unique opportunity to enhance both the setting of the conservation area and the listed building.

7.2 DETAILED MATTERS

7.2.1 In establishing the principle of development, consideration turns to detailed matters which are considered of relevance to the application as follows:

- Housing mix
- Affordable housing
- Quality of residential accommodation
- Impact on the character and appearance of the area

- Impact on the significance of heritage assets
- Trees & landscaping
- Biodiversity
- Residential amenity
- Highways impact
- Basement impact
- Flood risk and drainage
- Energy and sustainability

7.3 HOUSING MIX

7.3.1 The Council acknowledge that there is a need and/or demand for dwellings of every size. However, the Camden Strategic Housing Market Assessment indicates that the greatest requirement in the market sector is likely to be for two and three-bedroom homes, followed by one-bedroom homes/studios. Two and three-bedroom homes are therefore highlighted as high priority by Local Plan policy H7 which expects proposals to include some dwellings that meet these priorities wherever it is practicable to do so.

7.3.2 In this instance, the proposed housing mix has been amended following pre-application discussions and now includes provision for a two bed home in addition to two one bed homes. This has been amended from an initial iteration of the scheme that proposed three one-bed units which was originally thought to be most practicable given the site constraints. However, the current scheme highlights that the proposed development makes the best use of the site in helping to create a mixed and balanced community in accordance with Policies H6 and H7 of the Local Plan.

7.3.3 This approach aligns with pre-application discussions, as per the below comment from the pre-application response:

Considering the heritage issues the principle of providing three 1 bedroom 2 person properties is acceptable. Following further meetings another option has been put forward which provides two 1 bedroom 1 person units and one 2 bedroom 3 person unit. This mix is also accepted.

7.4 AFFORDABLE HOUSING

7.4.1 The government issued guidance in 2014 creating a national affordable housing threshold and advising that councils should not seek affordable housing from developments involving 10 homes or less, or 1,000sqm or less. Following legal challenges, this guidance was confirmed in 2016.

7.4.2 However, given the scale of affordable housing need in the borough, the Council's aspiration was, and is, that as many residential developments as possible should provide affordable housing. Through the Local Plan process therefore, the Council made provision for the Local Plan to seek affordable housing from smaller schemes as an exception to the national threshold.

- 7.4.3 Policy H4 of the Local Plan therefore seeks to maximise the supply of affordable housing in the borough and expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 7.4.4 Policy H4 allows a flexible approach to be applied by the Council in assessing whether a contribution should be sought. Those criteria require, amongst others, that the following be considered; the character of the development, the site and the area; the size of the site and any constraints on developing the site for a mix of housing; and the economics and financial viability of the development.

7.5 QUALITY OF RESIDENTIAL ACCOMMODATION

- 7.5.1 Policy A1 of the Local Plan seeks to ensure development provides accommodation of a suitable standard of living taking into account size of the unit, daylight, sunlight, outlook, privacy and noise and vibration and this is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.
- 7.5.2 The layout of the proposed development has been amended following pre-application advice received from Planning Officers. The new residential accommodation is accommodated at the northern part of the site, avoiding a potentially contrived arrangement, including difficult access and matters of intervisibility.
- 7.5.3 The proposed residential units are all of a high quality and meet the required internal space, storage and room size standards.
- 7.5.4 The relationship of built development has been carefully considered in the context of the topography and distances between buildings. There are no windows that would generate a level of unacceptable intervisibility between the application site and neighbouring properties and the level of physical separation means there are unlikely to be any detrimental effects on the levels of sunlight/daylight. For full details please refer to the Design & Access Statement that has been submitted in support of the application.
- 7.5.6 Policy H6 of the Local Plan requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2) and 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).
- 7.5.7 The post-text to Policy H6 states (with emphasis added) ...

'The optional Building Regulations in approved document Part M4 include Category 2 for "accessible and adaptable dwellings" and is broadly equivalent to satisfying Lifetime Homes criteria'.

and (with emphasis added) ...

'Since 2006, the Council has been using planning policies to ensure that new homes meet Lifetime Homes criteria wherever possible'

- 7.5.8 In this instance the site is naturally constrained by the gradient of the land which means that compliance with M4(2) is not physically possible. This difficulty of compliance is further complicated by the designated constraints of the site, which include the listed status of the property and its location within the Hampstead Conservation Area. This means there are no practicable or reasonable measures that would negate these constraints. Therefore, it is not possible for the additional residential development at the site to comply with M4(2).
- 7.5.9 It naturally follows therefore, that compliance with M4(3) is not necessary and in any case, the supporting text to Policy H6 states that the council would not expect the provision of M4(3) in developments that propose five units or less.
- 7.5.7 Refuse and recycling is stored within an identified location to the north of the main building. This will accommodate bins that address Policy CC5 of the local plan. The distance between front door of each house and refuse storage are is less than 30m. Access for refuse vehicles will be from Frognal and the distance from the refuse store to the collection vehicle is 20m. The gradient of the drag path is 1:11. Whilst this is not shallower than 1:20 as per CPG recommendations, the existing driveway is part of the setting of the existing Grade II listed house and any change would have an impact on the Eastern elevation of the house.
- 7.5.8 In light of the above, the quality of the residential accommodation is acceptable, in accordance with guidance and standards set out in the development plan and national planning policy guidance.

7.6 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

- 7.6.1 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.*
- 7.6.2 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 1 on Design.
- 7.6.3 The proposed development does not depart from the lawful residential use of the site and the main issue relating to impact would therefore be limited to density, design, layout and appearance.
- 7.6.4 In terms of density, this is best read through the proposed extent of demolition. The application proposes the demolition of the unsympathetic 1970s addition and its replacement with an exemplar proposal which will significantly enhance the setting of

the host building and the wider conservation area. The plot ratio will be significantly enhanced by the proposed development and the density of development would not be harmful to the character of the area.

- 7.6.5 Rooms within the ground floor of the main house will be re-instated to the original plan form by removing partitions that have sub-divided some rooms. A new, smaller, single-storey extension will be constructed in the location of the north side of the demolished extension, connected to the ground floor of the main house.
- 7.6.6 The form of the extension has been sculpted around key views out to landscape and back to the main house from the gardens. They have also taken into consideration overlooking and privacy from both Frognaal and neighbouring properties. The extension will follow the natural gradient of the site and climb up the slope with the garden towards the west side of the site.
- 7.6.7 The proposed mansard will be traditional in form, with two angled planes and a flattened top to limit the overall height and control its proportions relative to the main walls. Subordinate dormer windows are set into the lower slope to align with the existing openings below. The internal height at its highest point is lower than that on the floors below to reflect the changing hierarchy of spaces as you progress up the building.
- 7.6.8 This will provide an authentic and rational architectural termination to the building and will relate sympathetically in terms of height, bulk and massing to the scale and proportions of the existing house and surrounding buildings.
- 7.6.9 To conclude on matters of character and appearance, it is considered that the proposed development encompasses a high-quality design that has been established through pre-application discussions. It is sympathetic to neighbouring development, would not be overly prominent in the wider surroundings, and provides for an elegant design that both respects and responds to its context. The proposed development is therefore considered to accord with the principles of the development plan and national planning policy guidance in this regard.
- 7.6.10 For full details of all internal and external changes please refer to the Design & Access and Heritage Statements that support the submission.

7.7 IMPACT ON THE SIGNIFICANCE OF HERITAGE ASSETS

- 7.7.1 In the NPPF, heritage significance is defined as: *“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*
- 7.7.2 As defined by the NPPF, the setting of a heritage asset is *“the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative*

contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

- 7.7.3 In connection with the above, Historic England’s Planning Note 3 confirms that *“Understanding this history of change will help to determine how further development within the asset’s setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance.”*
- 7.7.4 In this case, the proposals involve a full programme of repair, refurbishment and renovation to convert this Grade II listed building from institutional use to a single family home. The works will focus on removing later additions and accretions which have detracted from its special quality, plan form, appearance and setting, as well as significant improvements to its sustainability and thermal performance.
- 7.7.5 Externally, the proposed mansard roof will be a sympathetic addition to the listed building, reintroducing form at roof level and providing appropriate architectural termination to its facades. Furthermore, the replacement of the existing 1970s accommodation block with a new sensitively designed domestic extension will significantly enhance the setting of the house, reconnecting it physically and visually with its extensive garden.
- 7.7.6 The additional housing will be discreetly positioned in relation to the house and will have an appropriate visual and physical relationship with the main listed building.
- 7.7.7 In respect of the design considered in its own right, and the relationship between the proposed development and its surroundings, the effect will be entirely positive. The proposed development will enhance the quality of the townscape of the area and the character and appearance and significance of the Hampstead Conservation Area. There will be no adverse effect on the setting of the listed building. In respect of design and built heritage considerations, it is in line with the policies and guidance on design set out in the NPPF and PPG; London Plan policies; local plan policies and CPGs. Please refer to the Heritage Assessment that accompanies the application for a full assessment of heritage impact.

7.8 TREES & LANDSCAPING

- 7.8.1 In general terms, soft landscaping, whether or not there is public access to it, is important for its contribution to the quality of urban life by providing important green lungs, visual breaks and wildlife habitats in built-up areas. In site specific terms, soft landscaping is an integral part of the application site and wider surroundings. This is highlighted in the conservation area appraisal which refers to an overriding impression of heavy foliage and mature trees. As a result, there are various policies, both locally and nationally, that aim to protect and/or encourage the provision of landscaping and open space.

- 7.8.2 Policy G7 of the London Plan states that existing trees of value should be retained. Policy G1 of the London Plan refers to urban greening and seeks development to integrate green infrastructure such as tree planting, green roofs and walls, and soft landscaping.
- 7.8.3 The quality of the proposed development and the extent of planting proposals ensure that the development would not only preserve but enhance the garden space and wider heritage assets. This would be strengthened further by the exposure of green areas, a result of the proposed extent of green roofs across the extended space.
- 7.8.4 The accompanying arboricultural information provides a comprehensive methodology for the protection of the trees which will be retained. Appropriate Arboricultural conditions to secure tree protection can be attached to any permission granted where necessary. For full details, please refer to the supporting Design & Access and Arboricultural reports.

7.9 BIODIVERSITY

- 7.9.1 A primary aim of the NPPF is to contribute to and enhance the natural and local environment and requires decision makers to not only conserve but enhance biodiversity. This is echoed in the development plan under policies G6 (London Plan), A3 (Local Plan) and the CPG on biodiversity.
- 7.9.2 Hampstead Forum notes the site sits to the left of the North-Western Frognaal Biodiversity Corridor linking 99 Frognaal to Oak Hill Park Local Green Space. This is noted as including the large gardens of 90,99 and 99a Frognaal.
- 7.9.3 Varied biodiversity-supporting planting will be incorporated into landscaping to lightwells and gardens. The extension and new homes will feature mixed sedum and wildflower green roofs, which will support pollinators and biodiversity year-round. All of these aspects will serve the important function of enhancing the wider wildlife corridor.
- 7.9.4 To conclude, the proposed development can be delivered whilst maintaining the value of the site for wildlife and the proposed development would therefore accord with both the NPPF, development plan policies and the Camden CPG on Biodiversity.

7.10 RESIDENTIAL AMENITY

- 7.10.1 Policy A1 of the Local Plan seeks to ensure development protects neighbouring residential occupiers from the adverse impact of development. This is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.
- 7.10.2 Proposed windows have been carefully positioned to avoid direct overlooking to neighbouring properties or gardens. No habitable windows are proposed to the north elevation of the proposed works which would afford direct views to neighbouring properties.

- 7.10.3 The impacts of the development on neighbouring daylight and sunlight have already been established as the proposed extensions/alterations do not increase the height of existing property to the rear. The addition of the mansard roof, while increasing the height of the main building would not be detrimental to neighbouring residents given the physical separation allowed and the inability to generate direct vantage points for overlooking.
- 7.10.4 By virtue of the isolated location of the extended space, it is clear that there will be no overbearing impact on surrounding properties or any overlooking and privacy issues to private gardens.
- 7.10.5 In light of the above, the application proposals would not cause undue harm to the amenity of neighbouring residents, in accordance with the NPPF and Policy A1 of the Local Plan.

7.11 HIGHWAYS IMPACT

- 7.11.1 The NPPF, at Section 111, states that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*”
- 7.11.2 It is reasonable to expect that the alternative arrangement of uncontrolled student accommodation would generate significantly higher levels of pedestrian/traffic movements. The proposal in this instance will therefore significantly reduce pressure on the local highway network.
- 7.11.3 The proposal will also provide cycle parking for each of the additional new residential properties and these spaces will be safe, secure, easily accessible and well lit, in accordance with Camden’s policy regarding sustainable methods of transport.
- 7.11.4 As above, at a national policy level, the NPPF states that development should only be refused planning permission if the transport impact of development is considered to be ‘severe’. The proposed development would not result in a severe transport impact and as such the development should be considered acceptable on highways grounds.

7.12 BASEMENT IMPACT

- 7.12.1 Paragraph 6.110 of the Local Plan states that ‘a basement is a floor of a building which is partly or entirely below ground level. Therefore, as the proposed development comprises development below ground, it requires assessment for basement impact.
- 7.12.2 In light of the above, a Basement Impact Assessment supports the application. The content of the assessment is structured to determine any residual impact that might arise from the proposed development. It also confirms compliance with Policy A4 of the local plan.
- 7.12.3 The assessment concludes that no adverse residual or cumulative stability, hydrological or hydrogeological impacts are expected to either neighbouring structures

or the wider environment as a result of the development. For full details, please refer to the Basement Impact Assessment and Design & Access Statement that support the application.

7.13 FLOOD RISK & DRAINAGE

7.13.1 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. This guidance is echoed in the development plan which advises that development should not increase flood risk and should reduce the risk of flooding where possible.

7.13.2 The Environment Agency's (EA) flood zone map identifies the entirety of the site within Flood Zone 1. The 'Risk of Flooding from Surface Water' mapping, available through the EA website, indicates that there is a low to very low risk of surface water flooding across the site and there are no records of surface water flooding at the site.

7.13.3 The proposed site area is less than 1 hectare, and therefore under the NPPF (and NPPG) a site-specific Flood Risk Assessment (FRA) is not required to support the application. However, for more detailed information about flood risk please refer to the Basement Impact Assessment that supports the application.

7.14 ENERGY & SUSTAINABILITY

7.14.1 The development plan requires all developments to minimise the effects of climate change.

7.14.2 There are competing development plan objectives, specifically in relation to heritage impact and sustainability credentials and to that effect, there is an overarching statutory requirement to give great weight to any harm to the significance of a heritage asset.

7.14.3 To align with the above, the 1740s house will of course be retained but retrofitted to the highest possible standards within the limitations of its' listed status. These measures are set out in the Sustainability Statement which supports the application.

7.15 SUSTAINABLE DEVELOPMENT

a. The presumption in favour of sustainable development

7.15.1 The NPPF states that "*the purpose of the planning system is to contribute to the achievement of sustainable development*" and at the heart of the NPPF is a presumption in favour of sustainable development (paras 7-14). It advises that there are three dimensions to sustainable development: economic, social and environmental which are interdependent and should be pursued in mutually supportive ways.

7.15.2 The proposed development would secure net gains across each of the dimensions to sustainable development.

- 7.15.3 Firstly, the proposal would deliver social and economic benefits by providing 4 high quality homes in an accessible location. In this respect, the development would make a modest contribution to meeting housing requirements and choice in the borough whilst supporting local services and businesses. There would be temporary economic benefits arising from the construction activity required to deliver the development which would generate employment opportunities for the local community and have associated benefits for local services and suppliers in the short term (longer term in relation to the maintenance of buildings). In the longer term, the development would support the local economy in terms of the use of local shops, services and facilities, and overall would contribute towards achieving the economic dimension of sustainable development.
- 7.15.4 A recent appeal decision (APP/E2530/W/17/3181823) serves to illustrate that providing a supply of housing to meet the needs of present and future generations is a public benefit that delivers social and economic progress, and is capable, in itself, of outweighing harm to the significance of designated heritage assets.
- 7.15.5 However, the proposal in this instance also significantly improves existing housing provision, increasing floorspace and providing amenity areas, further emphasising the social sustainability of the development.
- 7.15.6 There are considerable public benefits associated with the proposed development and these need to be assumed substantial weight. The NPPF makes it clear that sustainable development has three dimensions: economic, social and environmental. The proposal would fulfil the economic role of sustainable development in terms of construction jobs, increased spending in the area, and additional Council tax revenues. With reference to the social dimension the scheme would contribute to boosting housing supply, by providing a range of sizes of housing for the community.
- 7.15.7 Crucially, in terms of environmental benefits, the proposal would significantly improve the setting of the conservation area and the host listed building by removing an unsympathetic 1970s addition and replacing it with a high quality and responsive extension that responds entirely positively to the setting of the host building and wider area.

8. SUMMARY & CONCLUSION

- 8.1 This application seeks full planning permission and listed building consent for a change of use of the convent to a single dwellinghouse. This will include a full refurbishment and renovation of the building alongside a new mansard roof and rear extension to replace the existing 1970s accommodation block as well as the creation of three new dwellinghouses.
- 8.2 The proposed development will facilitate the best use of the site, maintaining its residential status and thereby its optimum viable use. The reversion of the main house to a single residence will serve the purpose of revealing the original proportions of key spaces which have been heavily compromised by the installation of partitions during the 20th and early 21st centuries and this further highlights that, with specific reference to the main house, a single residential dwelling represents its optimum viable use.
- 8.3 The modest loss of student accommodation will be offset by the introduction of policy compliant self-contained homes and as above, this would align with the principles of Local Plan Policy H9 which requires alternative permanent housing provision to be provided.
- 8.4 In circumstances where competing demands exist; in this case the need to maintain and enhance the fabric and setting of the listed building and the need to accommodate Camden's housing needs, it is considered that the introduction of 3 additional policy compliant homes in conjunction with significant heritage benefits would represent an appropriate balance against the perceived loss of student accommodation. The heritage benefits that would be generated by the proposal include the following:
- Full programme of repair, refurbishment of this grade II listed building;
 - Renovation
 - Removal of unsympathetic west wing and erection of architecturally and historically sensitive replacement of listed building that responds positively to the fabric and setting of the listed building and conservation area.
 - Reinstatement of the vacant listed building to its original use as a single family dwelling;
 - Internally the works will reveal the original proportions of key spaces, including the ground floor dining room and the former drawing room at 1st floor level which have been heavily compromised by the installation of partitions during the 20th and early 21st centuries;
 - Reintroduction of form at roof level providing appropriate architectural termination to the building;
- 8.5 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 NPPF and the development plan. The site will contribute to the creation of a socially inclusive community, whilst also maintaining and enhancing its

environmental importance and quality. It is considered that the proposal would significantly improve the built and natural environment in this location by providing a high-quality development on a site that is currently compromised by poor quality interventions.

- 8.6 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 an identified housing need as well as the overall supply of housing.
- 8.7 This Planning Statement should be read alongside the other supporting documentation and drawings which have been submitted as part of these full planning and listed building consent applications.