



*Town Planning Consultants
Development Advocacy*

PLANNING STATEMENT

26 ROSSLYN HILL

MARCH 2025

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1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of an application for demolition behind the retained front façade of 26 Rosslyn Hill and the erection of a replacement three storey building, with accommodation in the roof, to provide three residential apartments.
- 1.2 The scheme proposes three apartments, designed to be fully accessible, which will provide high quality living accommodation and private amenity space. This includes the reinstatement of a garden at the rear of the property which had been lost over time to hardstanding and car parking.
- 1.3 The site is located on Rosslyn Hill close to the junction with Downshire Hill. It is located in the Hampstead Conservation Area, to the east of the former Hampstead Police Station (a Grade II listed building) and west of Nos. 22 and 24 Rosslyn Hill (a Grade II listed building). As such, this Planning Statement is supported by a Heritage Statement and Townscape Visual Impact Assessment, prepared by Heritage Information, to consider the impact of the proposal on these heritage assets.
- 1.4 The existing dwelling has remained vacant for over ten years and the opportunity has arisen to bring the site back into beneficial use, providing much needed housing for the Borough which is significantly under delivering on its housing need. The scheme will also provide significant benefits through retaining and refurbishing the front façade, which positively contributes to the character and appearance of the Conservation Area, enhancing the street frontage, providing energy and sustainability improvements, together with the provision of fully accessible homes for future occupiers.
- 1.5 The following section provides further detail with respect of the site and surrounding area. Section 3 details the proposed development. Section 4 sets out the decision taking framework along with an appraisal of the scheme

against relevant policies, with matters then drawn together in the conclusions at Section 6.

2. SITE AND SURROUNDING AREA

- 2.1 The site is located at 26 Rosslyn Hill, Hampstead. It is less than 500m from Hampstead Underground Station and less than a 10-minute walk from Hampstead Heath. It is adjacent to Hampstead Town Centre which contains a variety of shops, services, cafes and restaurants. The closest bus stops to the site are within 150m, providing services toward Paddington and Golders Green and towards Kings Cross and Holborn.
- 2.2 The site comprises a Victorian building which is located to the east of the former Hampstead Police Station (a Grade II listed building). The police station and No.26 have been vacant since 2013 when the site was then sold to the Department for Education.
- 2.3 To the east of No.26 is Nos.22 and 24 Rosslyn Hill (a Grade II listed building). According to its listing, this was originally a detached house which now comprises two residences. The property is set back from No.26 and there is significant tree planting and screening between the two sites, along with a high boundary wall reflecting the level differences between the two sites.
- 2.4 No.26 is accessed at the front of the property from Rosslyn Hill with access to the rear of the site gained from Downshire Hill, through the car park at the rear of the former police station building.
- 2.5 The property is located within the Hampstead Conservation Area and is identified within the Conservation Area Statement as an unlisted building which makes a positive contribution to the Conservation Area. The surrounding area is predominantly residential.
- 2.6 No.26 was erected in the 1860s prior to the police station and stood alongside four other properties on Rosslyn Hill. These four properties were subsequently

demolished circa 1912 and the police station erected on the combined site of the previous properties and their gardens in the 1930s.

- 2.7 There have been a number of applications on the site of the former police station (not including No.26), more recently two applications relating to the change of use of the building to a school. The first application¹ for change of use to a school was refused in August 2016. The second application² was refused in December 2019 and dismissed at appeal³ in December 2020. Although No.26 did not form part of the appeal site the Inspector described it as *“Adjoining the police station building is a Victorian house, 26 Rosslyn Hill, formerly used as living accommodation by the police.”*⁴.
- 2.8 The appeal scheme was dismissed due to (i) the need to adapt a building not designed for school use with distinct architectural and heritage value, necessitating very significant intrusive alteration with limited heritage benefits, amounting to a high level of ‘less than substantial’ harm; (ii) the siting of the school close to a busy road, inevitably exposing children for the foreseeable future to higher relative levels of pollution, more serious at certain times of day, contrary to emerging policy which attracts significant weight; and (iii) the substantial level of annoyance and reduction in the quality of life for neighbouring occupiers. Following the dismissal of these appeals the Department for Education sold the police station site.
- 2.9 Planning and listed building consent was then granted in September 2022 for the former Stables building located to the rear of the police station. The application comprised the *‘Change of use and refurbishment of the Stables building and internal alterations to provide residential accommodation’*⁵. The

¹ Application ref. 2016/1590/P

² Application ref. 2019/2375/P

³ Appeal ref. APP/X5210/W/20/3248002

⁴ Paragraph 5 of Appeal ref. APP/X5210/W/20/3248002

⁵ Application ref. 2022/0329/P &

Delegated Report (Members Briefing) for the application confirmed that housing is Camden's priority land use. It also acknowledged that the former stable building has been disused and empty for quite a while and is in a poor state of repair confirming there is no objection in principle to the wholesale redesign of the interior as a residential unit. The Report concluded that *"Bringing back the existing derelict building into use and its use for residential purposes are strongly welcomed"*.

- 2.10 In October 2024 planning and listed building consent was granted to include the Annex building of the Stables as part of the new residential home through its demolition and construction of a new single storey building⁶. A subsequent application to replace the Annex with a two-storey building was recently refused on 14 January 2025⁷ and an appeal has been lodged.
- 2.11 On 10 October 2024 the Council's Planning Committee resolved to grant planning and listed building consent, subject to the completion of a s106 agreement, for the change of use of the adjoining former police station to provide five residential units, commercial and private healthcare floorspace, three and four storey rear extensions, external alterations and landscaping⁸. The proposals include a four-storey infill extension adjacent to No.26 comprising office space at lower and upper ground levels and residential flats at first and second floor levels. In recommending approval, which Members agreed with, the Committee Report⁹ states: *"The infill extension that is south of the closet wing occupies a small gap between the building and the flank wall of 26 Rosslyn Hill. This is only legible from mostly oblique, private views and contributes little to the overall setting and special character of the police station. Therefore, the scale and massing in this area is accepted."*

⁶ Application ref. 2024/0222/P & 202/1090/L

⁷ Application ref. 2024/4338/P & 2024/4871/L

⁸ Application ref. 2024/1078/P & 2024/1078/L

⁹ Paragraph 7.19

2.12 The four-storey infill extension is highlighted in the rear elevation below:



2.13 This current application builds upon the planning history of the site and the surrounding buildings to provide a residential building, comprising three apartments, that will positively contribute to the Conservation Area and respect its relationship with the neighbouring listed buildings.

3. PROPOSED DEVELOPMENT

- 3.1 The proposal comprises demolition behind the retained façade of 26 Rosslyn Hill and the erection of a replacement three storey building, with accommodation in the roof, to provide three residential apartments, together with rear garden boundary wall, hard and soft landscaping and associated works.
- 3.2 The scheme has been designed to maintain, where possible the existing arrangement at the front of the property. This includes retaining and refurbishing the front façade, landscaping the existing front garden arrangement, and replacing the existing front boundary wall, railings and double wooden gate, with new wall and piers, railings and double gate more in keeping with the character of the area.
- 3.3 The proposed building is arranged with one apartment at lower ground floor level, one apartment at upper ground floor level and one duplex apartment over the first and second floors. The mix of apartments is 1 x 2 bed and 2 x 3 bed with the apartment sizes ranging from 105.6 sqm (GIA) to 176.1 sqm.
- 3.4 The lower ground apartment is accessed through the existing front door. An accessible side path is proposed up to the individual side entrances for the other apartments, where the upper ground apartment can be accessed directly and the duplex via a lift or stair to the first and second floors.
- 3.5 The lower ground floor apartment benefits from a garden area that is reinstated at the rear of the property to provide amenity space to future residents. The garden is enclosed by a new brick boundary wall with a side gate providing access from the area to the rear of the former police station accessed from Downshire Hill. Private amenity space for the other apartments is provided by individual terraces.

- 3.6 The lower ground floor is proposed to be a three bedroom family unit, with a gross internal area of 166.7 sqm (GIA). Each bedroom has an ensuite bathroom, plus there is a guest WC and utility room. The master bedroom is to the rear, as is the large living / dining / kitchen area, both having access to the rear garden. Due to the natural topography and the sloping nature of the site the apartment has been designed on a split level basis to create interest in space and varied three-dimensional internal volumes. The apartment has been design to be compliant with the Building Regulations Part B, with protected means of escape, fire doors and detection.
- 3.7 The raised ground floor is proposed to be a two bedroom family apartment, plus a home working area, with a gross internal area of 105.6 sqm (GIA) and complying with Part M4(2). The living / dining / kitchen area has access to a rear terrace 19 sqm in size. Access to the unit is via a Building Regs compliant side path ramp up to its own front door on the side elevation. Due to site topography and desire to provide compliant and generous ceiling height to the unit below, there are two steps up into the main living accommodation. Wheelchair access is provided via a continuation of the side ramp round to the rear entrance to this unit.
- 3.8 On the first and second floors there is a duplex unit accessed from the stair and lift core accessed from the raised ground floor level along the side access ramp providing wheelchair access to this unit. The duplex is 176.1 sqm (GIA). It has three bedrooms and three bathrooms, plus a home working area, guest WC and utility room, storage on the first floor, and living space on the floor above. On the second floor the duplex has its living space, sitting area, dining and kitchen, with access to a 10 sqm terrace.
- 3.9 Refuse, recycling and food bins will be located in the stores as shown on the drawings. On collection day, they will be taken from the store to the front gates. These gates will be left open, on the relevant collection day, so as to allow the

bins to be collected but avoid having to locate these on the pavement causing possible obstructions to pedestrians. The stores are sized to accommodate two 240ltr wheelie-bins and a food caddy. Secure cycle storage is also included for two bikes per unit.

- 3.10 The front elevation will be retained as it is, aside from a minimal increase in the front face roof height and the slight raising of the front parapet, more akin to the original roof design, to improve the overall proportions. The chimneys and front roof slope will be rebuilt using materials salvaged from the demolition.
- 3.11 The proposal rationalises the south elevation, bringing the apartments onto level floors. The scheme will introduce two entrance doors at upper ground floor level for the upper flats and two small windows at first floor level into the new south side elevation, replacing the multiple windows on the existing fenestration. This elevation will be rendered to reflect the existing elevation, with two modern timber doors with side light, and the first-floor windows will be timber, with small four-over one pane timber sash windows which are reflective of those on the front elevation. The first-floor windows will have a brick header and this elevation will have minimal detailing. This ensures that the side elevation remains subservient to the front elevation.
- 3.12 The proposed scheme will have a very similar north elevation to that which is currently there, in that it will also be a blank wall which will abut the Grade II listed Police Station, who's consented four storey infill extension will dwarf this side of the subject site as existing. Therefore, the proposed increased bulk scale and mass of the subject site will sit contextually next to the police station.
- 3.13 The proposed rear elevation proposes a design which will encompass two Velux rooflights in the new mansard roof and also French doors with a small terrace area at second floor level set behind the parapet. The new mansard roof will be of slate. The elevation will be of stock brick which will be reused from the demolition, thereby sustaining the historic character and patina of the

rear elevation. The first floor will have three windows unevenly spaced, with similar Edwardian style to those on the front elevation, made of timber, eight panes over one. There will be flat brick arches over in the same brick, as with all of the windows, which continue to provide greater architectural coherence to the building as a whole. On the upper ground floor, there will be four French doors with fanlights, and each window subdivided into three horizontally. The terrace proposes metal balustrading. The lower ground floor will have a brick on edge detail within the wall below the terrace above, and brick piers in between the four French doors which will be subdivided into ten.

- 3.14 Further details on the design of the proposal are located within the submitted Design and Access Statement.

4. PLANNING POLICY APPRAISAL

- 4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Development Plan comprises the adopted Local Plan (2017) along with the London Plan (2021) and the Hampstead Neighbourhood Plan (2025). It is also relevant to consider the Camden Planning Guidance (CPGs) and National Policy as set out within in the National Planning Policy Framework, December 2024 (NPPF) particularly in terms of the consideration of sustainable development, housing delivery, previously developed land and heritage assets.
- 4.3 The Council consulted on a Regulation 18, Draft New Local Plan between January and March 2024 with an updated version anticipated to be consulted on in Spring 2025. The Draft Local Plan is therefore considered to carry no weight in the decision taking process.
- 4.4 The following principal planning policy considerations are assessed below:
- i) Sustainable development and use of brownfield land
 - ii) Principle of demolition
 - iii) Housing
 - iv) Design, heritage and townscape
 - v) Quality of accommodation and accessibility
 - vi) Impact on neighbouring amenity
 - vii) Energy and sustainability
 - viii) Transport
 - ix) Trees and biodiversity

Sustainable development and use of brownfield land

- 4.5 The NPPF at paragraph 7 states that: *“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.”* Paragraph 10 goes on to say: *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).”*
- 4.6 The presumption in favour of sustainable development and the ‘tilted balance’ currently applies in Camden as the Council is unable to demonstrate a five-year housing land supply and the borough’s most recent Housing Delivery Test score (2023) is 53%. Therefore, as per paragraph 11(d)(ii) of the NPPF, the Council should grant planning permission unless *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”*.
- 4.7 Furthermore, paragraph 125(c) of the NPPF states that decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused”*. Part (d) of this paragraph then states that decisions should *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”*.
- 4.8 The proposed three additional homes on a suitable brownfield site should therefore be attributed substantial weight in the decision taking process unless it is determined that substantial harm has been caused. Otherwise, the presumption should be in favour of sustainable development, and planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

- 4.9 It is under this decision taking framework that the proposed development should be assessed.

Principle of demolition

- 4.10 It is proposed to demolish the existing building behind the retained façade. Local Plan Policy CC1 (Climate change mitigation) requires all development to minimise the effects of climate change. With regard to demolition the policy states that the Council will “(e) *require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and (f) expect all developments to optimise resource efficiency.*” In this respect the following documents have been submitted in support of the application:

- Condition and Feasibility Study
- Structural Engineering Strategy
- Structural Survey of Building
- Structural Survey of Boundary Wall
- Timber and Damp Report
- Pre-Demolition Audit
- Whole Life Carbon Assessment

- 4.11 The Condition and Feasibility Study describes the four scenarios that have been assessed to demonstrate that it is not possible to retain and improve the existing building, other than the façade, which is the element of the building that positively contributes to the character and appearance of the Conservation Area. The four scenarios assessed are as follows:

- **Scenario 1:** Existing building – no upgrades
- **Scenario 2:** Refit and refurbish – existing building with 3 unit layout and refit / refurb to Building Regs standard

- **Scenario 3:** Substantial refurbishment and extension – proposed scheme retaining front and side elevations and any internal walls where possible
- **Scenario 4:** Proposed façade retention / new build

4.12 The above scenarios have been informed by the Structural Survey of the building which identified issues such as:

- Underpinning of foundations and retained walls required
- Cracks and movement in external walls
- Decayed and structurally undersized timber floor joists
- Damp proof membrane and insulation non-compliant with Building Regs
- High level of dampness, fungal growth and decay throughout
- Floor joists not tied to walls to provide lateral restraint
- Decayed rafters, failing roof covering and flashings

4.13 The Whole Life Carbon Assessment (WLCA) then assessed the four scenarios to determine the predicted embodied and operational carbon emissions over the building's 60-year Reference Study Period (RSP). The results from the assessment also provide benefits such as the comparison of reduced environmental impact, superior energy status, higher Energy Performance Certificate (EPC) ratings, and lower operational costs. The results are summarised below.

Scenario 1 – Existing Building – no upgrades

4.14 This option assessed the existing building, which currently operates with a gas-based heating system and inefficient building fabric. This resulted in the highest operational emissions of all scenarios considered. Although the existing building is structurally unsafe for occupancy, this option was included to provide a baseline for comparison with the other appraised options and demonstrate the relative carbon impact.

Scenario 2 – Refit and Refurbish

- 4.15 Despite keeping the changes in level from front to back, this split-level option necessitates structural alterations throughout the building and the entire boundary wall. The structural survey confirms that the existing building does not meet modern standards and would require underpinning. To accommodate three apartments within the current building envelope, internal alterations are needed to comply with Building Regulations. Also, because there are no cavities in the walls, internal insulation would be required, which would reduce the internal floor area.
- 4.16 This option produces split-level flats throughout with consequent negative implications for Part M accessibility. Also, due to the size of the existing building, it creates 3 x 1 bed flats which are the low priority dwelling size in Camden.
- 4.17 This option achieves the lowest upfront embodied carbon. However, it fails to provide an energy efficient building with the sample flat that was modelled gaining an EPC rating of 'C'. As a result, the whole life-cycle carbon, including the operational emissions of this Scenario 2 option, over the RSP, would surpass the emissions of other options.

Scenario 3 – Substantial refurbishment and extension

- 4.18 Scenario 3 is similar to Scenario 4, except it also retains the side elevations and partially retains the internal walls where possible. However, this option requires a substantial part of the existing internal structure and the rear elevation to be demolished by retaining the front and side elevations as part of the temporary works. Also, since the existing building structure is derelict and damaged, the retained façade will require intimate support points in order to replicate its current support condition.

- 4.19 Whilst the walls could be theoretically retained in this option, it would be hugely complex considering other parts of the building at lower ground level that would need to be removed and the underpinning of the adjacent boundary wall. This option is therefore not considered feasible.
- 4.20 Notwithstanding this, the results demonstrate that Scenario 3 would have higher upfront carbon emissions associated with the structural strengthening of the building and an EPC rating of 'C'. Therefore, over the 60 year RSP it would not be the most sustainable alternative.

Scenario 4 – Proposed façade retention / new build

- 4.21 This option would have traditional construction of load-bearing masonry walls which support timber joists floors. It would follow circular economy principles, reusing the existing bricks, slates and timber, and recycling the demolition waste off-site by diverting it from the landfill. It would also incorporate energy efficient HVAC systems, improved building fabric and implementation of rooftop PV systems.
- 4.22 These measures allow the residential apartments to achieve an EPC rating of 'B' which results in Scenario 4 having the lowest cradle-to-grave emissions over the RSP and proves to be the most sustainable option.

Conclusion

- 4.23 Therefore, after consideration of all options over the 60-year RSP, Scenario 4 would be the least carbon-intensive option due to efficient MEP systems and improved building fabric. Additionally, the new build option meets the GLA benchmark for residential schemes. The assessment undertaken accords with London Plan Policy SI 2 and Local Plan Policy CC1 to calculate and reduce whole-life cycle carbon emissions of the proposed development.

- 4.24 The Pre-Demolition Audit also identifies that the Key Demolition Products (KDPs) present on site, that would represent 97.7% of all waste occurring on site are: (i) inert material; (ii) timber; and (iii) metals. The report demonstrates the benefits of recycling and re-use of the KDPs based on economic value, the quantity and viability of deconstruction, as well as potential schemes for re-use and recycling of these materials, anticipating that the landfill diversion rate would be 100%. This accords with the target to divert at least 95% of demolition waste from landfill and comply with the Institute for Civil Engineer's Demolition Protocol and either reuse materials on-site or salvage appropriate materials to enable their reuse off-site. This demonstrates that the proposed development would contribute to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1, Camden Planning Guidance, and Policy SI 7 of the London Plan.
- 4.25 It has therefore been demonstrated that demolition behind the retained façade and new build is the most sustainable option for the site.

Housing

- 4.26 Local Plan Policy H1 (Maximising housing supply) states:

“The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. We will seek to exceed the target for additional homes, particularly self-contained homes by:

a. regarding self-contained housing as the priority land-use of the Local Plan; and

d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.

We will monitor the delivery of additional housing against the housing target and will seek to maintain supply at the rate necessary to exceed the target.”

- 4.27 Over the period 2020 to 2023 the Council delivered 1,539 homes against a target of 2,927. This gave the Council a Housing Delivery Test score of 53%, hence it faces ‘the presumption in favour of sustainable development’ and the ‘tilted balance’ as explained in paragraph 4.6 above.
- 4.28 The provision of three homes on a vacant, underused, brownfield site, providing the maximum reasonable amount of housing should therefore be attributed “*substantial weight*” in the planning balance in accordance with paragraph 125(c) of the NPPF and the objectives of Policy H1.
- 4.29 Local Plan Policy H4 (Maximising the supply of affordable housing) applies a sliding scale target to developments that provide one or more additional homes and have capacity for fewer than twenty five additional homes, starting at 2% for one home and increasing by 2% for each home added to capacity. Capacity for one additional home is defined within the Local Plan as 100 sqm of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100 sqm. Where developments have capacity for fewer than ten additional dwellings / 1,000 sqm, the Council will accept a payment in lieu of affordable housing.
- 4.30 The proposed development provides 207.4 sqm of additional residential floorspace, taking account of the 251 sqm of floorspace within the existing building.
- 4.31 The last known use of the property was as living accommodation by the police. Before the police temporarily acquired the building in circa 1988, it had remained as a dwellinghouse from the date it was originally constructed for over 100 years. As there are six bedrooms within the property, it is a reasonable assumption that no more than six police officers would reside at the premises

at any one time. Small shared houses occupied by between three and six unrelated individuals, as their main residence falls under Use Class C4 (Small Houses in Multiple Occupation. As set out at paragraph 3.82 of the Local Plan, Policy H4 applies to different types housing including *“houses and flats shared by 3-6 occupiers who do not live as a family but are long-term residents sharing some rooms and / or facilities (small houses in multiple occupation or HMOs, Use Class C4)”*. Therefore, the proposed residential uplift is 207.4 sqm.

4.32 The calculation for the affordable housing payment in lieu is provided below and would be secured by a s106 planning obligation:

- Additional residential floorspace – 207.4 sqm
- Capacity (rounded per 100 sqm) – 2 new homes
- Additional housing % target – 4%
- Affordable housing floorspace target – $4\% \times 207.4 = 8.296$
- Payment in lieu – $8.296 \times £5,000 = £41,480$

4.33 The payment of £41,480 will make a valuable contribution towards the provision of affordable housing in the Borough and is a benefit of the proposed scheme, in accordance with Policy H4 of the Local Plan.

Design, heritage and townscape

Design

4.34 Local Plan policies D1, D2 and CPG Design require a high standard of contextual design which relates to the function of uses and carefully considers historical context, Policies DH1 and DH2 of the Hampstead Neighbourhood Plan require development to respond to the character of the area and contribute through good sustainable building design. These policies also specifically recognise the balance between the demands of sustainability and energy efficiency and considerations of heritage.

- 4.35 The proposal has been designed to provide a high quality residential development in line with Policy D1, meeting all relevant criteria. Given the site's location within the Conservation Area and adjacent to the Grade II listed former police station, careful consideration has been given to the design and finish of the property to ensure that it preserves and enhances these heritage assets. The scheme thus includes the retention of the front façade to ensure that the property continues to make a positive contribution to the Conservation Area in accordance with Policy DH1 of the Neighbourhood Plan.
- 4.36 Whilst some minor amendments are proposed to this front elevation, these are not considered to negatively impact upon the positive contribution that the property makes to the Conservation Area. The slight increase to the ridge height achieves a more proportioned building which still nonetheless is subservient to the much larger former police station building. Landscaping of the front garden and the replacement front boundary wall, piers, railings and gates will enhance the appearance of the site in the street scene,
- 4.37 To the rear, the building will be built re-using the existing London Stock brick with a mansard roof in grey slate tiles, appropriate to the character of the Conservation Area. The rear fenestration will retain traditional window detailing that will complement the adjoining consented police station scheme. In terms of massing, the lower ground floor would be set back from the consented police station infill extension, with the upper ground and first floor set back slightly from the rear building line, and behind the privacy screen of the consented police station's upper ground floor. The mansard roof level would be set well below the top storey of the consented police station infill extension, and would be imperceptible in views from the front of the property.
- 4.38 The proposed massing is considered acceptable as it is not disproportionate contextually, particularly in relation to the consented scheme for the police station, which will dwarf the existing No.26 once built. This is consistent with

the assessment Officers undertook when approving the police station scheme, where the committee report states:

Para 7.19 – “The infill extension that is south of the closet wing occupies a small gap between the building and the flank wall of 26 Rosslyn Hill. This is only legible from mostly oblique, private views and contributes little to the overall setting and special character of the police station. Therefore the scale and massing in this area is accepted.”

Para 8.4 – “... The move to provide most of the massing to the south of the closet wing is welcomed as this is the least visible location. “

- 4.39 Overall, the proposed development complies with Local Plan Policies D1 and D2 and Policies DH1 And DH2 of the Hampstead Neighbourhood Plan.

Heritage

- 4.40 The site is located within the Hampstead Conservation Area (Sub-Area 1). The existing building is identified as making a positive contribution to the Conservation Area. The property is also adjacent to the Grade II listed former Hampstead Police Station. Nos. 22 and 24 Rosslyn Hill, which is also Grade II listed, is located to east of the site, set well back from the street.
- 4.41 Before reviewing relevant local planning policy, it is acknowledged that, pursuant to the Planning (Listed Buildings and Conservation Areas) Act 1990, local planning authorities have a statutory responsibility to pay special attention to preserving or enhancing the character or appearance of Conservation Areas within their jurisdiction and also the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. This is a separate statutory duty which local planning authorities must adhere to in addition to policy requirements.

- 4.42 Policy D2 of the Local Plan confirms that the Council will “*preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings.*” This includes “*both conservation areas and listed buildings*”. The policy goes on to state that development will not be permitted if it results in less than substantial harm to the significance of a designated heritage asset unless the public benefits outweigh that harm.
- 4.43 In terms of conservation areas, Policy D2 states that development within Conservation Areas is required to preserve or, where possible, enhance the character or appearance of that area. With respect of listed buildings, the policy states that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting.
- 4.44 A Heritage Statement, prepared by Heritage Information, supports the application which states that the proposals are considered to sit comfortably with the architectural language, detailing and style of the building and the Conservation Area. The increase in bulk, scale and mass will be barely perceptible from the public realm, particularly not from Rosslyn Hill from where the character and appearance of the Conservation Area and the architectural and historic interest of the site is best appreciated and understood.
- 4.45 From the public realm on Rosslyn Hill, any glimpsed views of the roof of the new scheme would be minimal and would not harm the Conservation Area. The proposed rear is proportional with a simplified design and the proposed garden space enhances the character and appearance of the Conservation Area. Furthermore, the proposed scheme reflects the contextual use of materials and detailing to provide enhanced architectural coherence to the building, still respecting and reflecting its hierarchy.
- 4.46 Overall, the proposals are considered to have a minimal and neutral to positive impact on the character and appearance of the Hampstead Conservation Area.

The proposals have a predominantly minimal and neutral to positive impact on the setting of statutorily listed buildings.

- 4.47 There is therefore considered to be no harm caused to any heritage assets in accordance with Policy D2 of the Local Plan.

Townscape

- 4.48 In terms of townscape visual impact the following views of the proposed development have been assessed within the Townscape Visual Impact Assessment (TVIA) prepared by Heritage Information which sets out the following:

Baseline View 1 – Rosslyn Hill looking North-West



- 4.49 This view is looking along Rosslyn Hill to the north-west into the Hampstead Conservation Area. The dominant Grade II listed former Police Station adjoins

the subject site on the north side, but the subject site is considerably set back compared to the police station. The view captures the comparatively smaller scale the subject site represents when compared with the taller Police Station and buildings higher up Rosslyn Hill. The uncharacteristic timber gate is also visible in this view as is the fencing and vegetation associated with Grade II listed No .24 Rosslyn Hill.

Proposed View 1 – Rosslyn Hill looking North-West



- 4.50 The proposed view can be seen above, in the context of the consented police station scheme, which extends their south elevation vertically above the roofline of No.26, with their roof top plant enclosure visible in the background. The proposed mansard roof extension and side south elevation will be scarcely perceptible in the view, and has been designed to be minimally impactful to the views of the listed buildings and Conservation Area. The mansard roof is of a shallow pitch which will not obstruct any building or landscape already existing

behind it from this view from the public realm on Rosslyn Hill and will be complementary to the palette of materials already found within the Conservation Area. The raised ridge height and parapet is minimal and improves the architectural proportions of the retained front elevation, and the rebuilt chimneystacks continue to add visual interest to the roofscape.

- 4.51 The scheme does not harm the settings of the listed police station to the north or the listed Nos. 22 and 24 to the south of the site. The new more historically appropriate front boundary brick wall and railings are appropriate for the Conservation Area and others found on Rosslyn Hill, allowing for greater appreciation of the architectural interest of the retained front elevation.

Baseline View 2 – Rosslyn Hill – looking towards the site



- 4.52 This view is looking towards the site from the opposite side of Rosslyn Hill into the Hampstead Conservation Area. The dominant listed former police station adjoins the site on the north side, but No.26 is considerably set back compared

to the police station. The view captures the comparatively smaller scale the existing building represents when compared with the taller police station and buildings higher up Rosslyn Hill. The uncharacteristic timber gate is also visible in this view as is the fencing and vegetation associated with the listed Nos. 22 and 24 Rosslyn Hill.

Proposed View 2 – Rosslyn Hill – looking towards the site



- 4.53 The proposed view looking towards the site from the opposite side of Rosslyn Hill can be seen above. The proposed mansard roof extension is not perceptible in the view, the design is minimally impactful on the views within the Conservation Area. As stated above, the mansard roof is of a shallow pitch which will not obstruct any building or landscape already existing behind it from this view on the public realm on Rosslyn Hill and will be complementary to the palette of material already found within the Conservation Area. The raised ridge height and parapet is minimal and improves the architectural proportions of the

retained front elevation, and the rebuilt chimney stacks continue to add visual interest to the roofscape.

- 4.54 The scheme does not harm the settings of the listed police station to the north or the listed Nos. 22 and 24 to the south of the site. The new more historically appropriate front boundary brick wall and railings are appropriate for the Conservation Area and others found on Rosslyn Hill, allowing for greater appreciation of the architectural interest of the retained front elevation. The refurbishment of the front façade and landscaping of the front garden enhance the visual appearance of the site. The side access path ramp and slight change in incline to the south of the front garden is scarcely perceptible.

Baseline View 3 – Rosslyn Hill looking North-East



- 4.55 This view is looking north-east into the Hampstead Conservation Area from Rosslyn Hill. The listed police station dominates the foreground of this view to the north-west of the subject site which is partially concealed behind garden

vegetation and a mature tree, particularly during the summer months. The front elevation is in keeping with the Victorian architecture found along the street and adds architectural interest to the streetscape with its contrasting red brick detailing around the doors and windows in particular, where this is visible. The chimneystack on the south side of the existing building adds visual interest to the skyline, maintaining the character of its smaller scale domestic architecture compared to the higher status listed police station. However, the front boundary wall and railings, and timber gate are not particularly in keeping with the architectural style of the house, being modern copies. The listed Nos. 22 and 24 Rosslyn Hill can be seen in the background of this view, however again this is largely obscured by mature trees and vegetation for much of the year.

Proposed View 3 – Rosslyn Hill looking North-East



- 4.56 The proposed view can be seen above. The proposed mansard roof extension is not perceptible from this view, as it has been designed to be as minimally

impactful as possible to sustain the uniformity of the existing front elevation's positive contribution of the roofscape. The proposal has raised the parapet and front face of the roof by a scarcely perceptible amount which does not harmfully impact this view in any way and improves the proportions of the front elevation. The design will also rebuild the chimneystack on the south side elevation to ensure it remains a distinctive architectural element of the building and the streetscape.

- 4.57 The front boundary treatment has been improved by the proposals which introduce a historically appropriate low front boundary brick wall with railings, which is in keeping with other boundary treatments found along Rosslyn Hill, and replaces the timber gate with one with railings, all of which improves the visibility of the retained front elevation of the existing building, allowing for greater appreciation of the architectural contribution the front elevation makes to the Conservation Area. The side access path ramp may be glimpsed but has a neutral impact on the Conservation Area.

Baseline View 4 – Downshire Hill looking South-East



- 4.58 This view is taken from Downshire Hill within Hampstead Conservation Area, looking south towards the gated entrance to the rear yard of the police station. The architectural and historic interest of the neighbouring listed buildings is not best experienced in this view, although part of the listed police station is visible, this is not the principal elevation. It should be noted that this rear courtyard is gated with tall timber gates on Downshire Hill. The red brick wall along the south side boundary of No.26 site with Nos 22 and 24 Rosslyn Hill, and the listed building itself are visible in the background. The rear of the police station which protrudes into the yard blocks all views of No.26 as it currently exist in this view.

Proposed View 4 – Downshire Hill looking South-East



- 4.59 The proposed view can be seen above, in the context of the consented police station scheme. The proposed development does not block the view of any elements of interest within the townscape. The rear garden boundary wall which can be seen will sustain an appreciation and understanding of the hierarchy of

the surrounding listed buildings by remaining subordinate to them in scale and detailing, and enhance the view into the rear yard by reintroducing a rear garden to the site, indicating its residential use, especially when viewed in the context of the dominating bulk scale and mass of the consented police station extension closer to the foreground.

Baseline View 5 – Private view from rear courtyard of police station



- 4.60 This is a private view taken from within the rear courtyard of the police station, still within Hampstead Conservation Area, looking south towards the rear of No.26. The architectural and historic interest of the neighbouring listed buildings is not best experienced in this view, as well as the character and appearance of the Hampstead Conservation Area. Indeed, the rear elevation of the police station is somewhat unsightly and dominates the unattractive car park space. The red brick police station projects into the foreground in the centre of the view, with No.26 on the left side, pared back but likely historic

window openings and use of stock brickwork reflecting its period, at the top of a slightly sloped hardstanding rear parking area. The existing site has been unused for over ten years and is now in a state of disrepair.

Baseline View 5 inc consented police station scheme – Private view from rear courtyard of police station



- 4.61 This view shows the existing No.26 in the context of the consented police station extension scheme. The consented scheme for the police station dominates the existing building, largely screening most of the rear elevation through the terrace railings, privacy screens and bulk, scale and mass of the four-storey infill extension.

Proposed View 5 inc consented police station scheme – Private view from rear courtyard of police station



- 4.62 The proposed view can be seen above. The new scheme does not block the view of any elements of interest within the townscape. The scheme will sustain an appreciation and understanding of the hierarchy of the surrounding listed buildings by remaining subordinate to them in scale and detailing. Fencing has been introduced on the boundary wall with Nos. 22 and 24 Rosslyn Hill to ensure that privacy is respected, and the stepped form and footprint of the proposed rear breaks up the massing, adds visual interest and better reflects the form of the police station infill extension.
- 4.63 The proposed scheme is taller than the existing building, however this does not harmfully impact the listed police station, which itself is being extended significantly to the rear, as the front Rosslyn Hill elevation and the side Downshire Hill elevation are the principal elevations from where the building is

appreciated. The proposed development will sit comfortably alongside the bulk, scale and mass of the consented police station extensions. The neighbouring Nos. 22 and 24 is set back away from the site, and the mature vegetation and trees along the boundary will screen views towards the proposed building quite considerably, so its setting is minimally affected.

- 4.64 The detailing of the scheme is in a modern idiom which references the existing building but adds architectural interest and has been contextually designed and inspired by the existing building, with the chimneys being rebuilt. The addition of the mansard roof is minimally impactful on the appreciation of the character of the subject site and can barely be seen in this view. The new enclosed garden would reintroduce the rear garden which originally was associated with the site in the place of unsightly hardstanding / car parking. The boundary wall for this garden has been designed taking inspiration from the context of the rear yard area using the existing palette of materials, which enhances the appearance of the site.

Conclusion

- 4.65 The TVIA concludes that overall the proposed development would have a minimal to moderate and neutral to positive impact on the local townscape character, sustaining and enhancing the character and quality of the townscape, the character and appearance of the Hampstead Conservation Area and the settings of nearby heritage assets.
- 4.66 From the public realm on Rosslyn Hill and Downshire Hill the impact would be largely minimal to negligible. Only from the enclosed private courtyard to the rear of the police station would the impact be moderate, but even this moderate impact is considered to sustain and enhance the character and quality of the townscape, where the proposed development would sit comfortably alongside the bulk, scale and mass of the consented police station extensions. The proposed scheme would also be respectful of the scale of the surrounding listed

buildings and has been carefully designed to be an architecturally considered and appropriate addition to the rear courtyard, which is also respectful of the setting of listed buildings.

- 4.67 It is therefore concluded that the proposed development satisfies the relevant clauses of the NPPF and Policy D2 of the Local Plan which seek to preserve and, where appropriate, enhance Camden's heritage assets and their settings.

Quality of accommodation and accessibility

Quality of accommodation

- 4.68 Local Plan Policy H6 seeks housing choice and mix to create mixed, inclusive and sustainable communities, by providing high quality accessible homes. Policies H6 and D1 also require housing to provide adequately sized homes and rooms and maximise the provision of dual aspect dwellings. Policy H7 aims to secure a range of homes of different sizes with the highest priority of market housing being two bed and three bed dwellings as set out at paragraph 3.189 of the Local Plan. Policy A2 also encourages opportunities to provide private amenity space within new housing development.
- 4.69 The proposed mix of housing is 1 x 2 bed and 2 x 3 bed which accords with the higher priorities of dwelling size of Policy H7. The apartment sizes also range from 105.6 sqm (GIA) to 176.1 sqm which exceed the minimum internal space standards set out in London Plan Policy D6 at Table 3.1. All the apartments are dual aspect with room sizes and floor to ceiling heights that accord with the housing standards. Private amenity space is also provided in the form of a garden for the lower ground floor apartment, a 19 sqm rear terrace for the upper ground floor apartment and a 10 sqm roof terrace for the first / second floor duplex apartment, in accordance with Policy A2.

- 4.70 In terms of the internal daylight provision within the proposed apartments, an assessment has been carried out that is submitted with the application. The assessment demonstrates that ten of the eleven rooms assessed exceed the BRE's recommended criteria for illuminance. For sunlight, all of the apartments have at least two bedrooms exceeding the highest recommendations for sunlight.
- 4.71 The single room that falls slightly short of the internal daylight guidelines is the living / kitchen diner on the lower ground floor. However, the living room area of this open plan space does meet the recommended guidelines. It is the kitchen area that has been positioned at the back of the room, because this is where occupants use artificial lighting to provide an optimum lighting balance. Although the BRE guide gives numerical guidelines, these are intended to be applied flexibly since natural lighting is only one of many factors in site layout design.
- 4.72 Paragraph 130 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards. The layout of the proposed development provides a good application of the BRE guidelines and would overall provide good daylight and sunlight conditions within the proposed accommodation.

Accessibility

- 4.73 Local Plan Policy C6 (Access for all) seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The policy expects all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. Policy H6 then requires 90% of new build homes to be accessible and adaptable in accordance with Building Regs M4(2) and 10% 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).

4.74 Accessibility has been at the heart of the proposed design with all three apartments provided their own front door. The lower ground floor apartment would be accessed through the existing front door and can also be accessed through the rear garden. For the other two apartments a side access path is proposed that gently slopes up to upper ground floor level to individual side entrances where the upper ground apartment can be accessed directly and the duplex apartment accessed via a lift or stair to the first and second floors. The slope of the path has been designed to comply with Building Regs 'Access to and use of buildings', where it is necessary to ensure maximum slope gradients and landings are provided to make it fully wheelchair accessible, which is a benefit of the scheme. The proposed development therefore delivers the important objective of Policy C6 which requires the highest practicable standards of accessible and inclusive design.

4.75 The proposed development will therefore provide high quality residential accommodation that meets and exceeds all the necessary standards and that will be accessible to all, which is a key priority of the Council, in accordance with Policies H6, H7, D1, D6, A2 and C6 of the Local Plan.

Impact on neighbouring amenity

4.76 Local Plan Policies A1 and A4, Neighbourhood Plan Policy DH1 and the Amenity CPG are relevant with regards to assessing the impact of the proposed development on the amenity of neighbouring residential properties in terms of light, outlook, privacy and noise. The thrust of the policies is that an unacceptable level of harm to amenity should be protected.

4.77 The scheme has been designed so that it protects the amenity of both existing neighbouring buildings and also its future occupiers, taking into account the

requirements of planning policy and guidance. To the east of the property is Nos. 22 and 24 Rosslyn Hill which is set back from the road by approximately 23m and is circa 10m from the proposed development with no direct window to window relationship.

- 4.78 Notwithstanding the levels difference between the sites, the proposal has been designed to protect the amenity of neighbours through the inclusion of privacy screening above the boundary wall adjacent to the side access path and the upper ground floor terrace. There is also significant tree and vegetation screening along the boundaries between the two properties. There are no other residential properties that would be potentially affected by the proposed development. The amenity of future occupiers of the proposed scheme would also be protected by the use of privacy screens to terraces, where necessary to prevent any potential overlooking from neighbouring buildings, and the lower ground floor garden benefits from a boundary wall on all sides with additional planting as screening above.
- 4.79 A Plant Noise Impact Assessment has been submitted with the application which demonstrates that noise from the proposed plant in the garden, when attenuated, will meet the requirements of Policy A4 and the Amenity CPG, thus not adversely impact on the amenity of neighbouring residential properties. The application is also supported by a draft Construction Management Plan (CMP), the final version to be submitted for approval in due course once the permission is issued and further construction details available. The CMP will ensure that any noise or disturbance arising from the construction of the development, including the demolition stage, will be minimised to protect the amenity of the neighbouring residents. The CMP will also consider dust as part of its assessment in accordance with Policy CC4 'Air quality' to minimise and mitigate, where necessary, the risk of dust arising from the demolition and construction phase.

- 4.80 Overall, the proposal has been designed to avoid any harmful effects on the amenity of existing and future occupiers and nearby properties in accordance with Local Plan Policies A1 and A4, Neighbourhood Plan Policy DH1 and the Amenity CPG.

Energy and sustainability

- 4.81 The proposal is supported by an Energy and Sustainability Statement which demonstrates how the proposal minimises the effects of climate change in line with Policy CC1 'Climate change mitigation', how appropriate climate change adoption measures have been incorporated in line with Policy CC2 'Adapting to climate change' and how water efficiency measures are included within the proposal in accordance with Policy CC3 'Water and flooding'. The scheme incorporates photovoltaics and air source heat pump technology. In line with Policy CC2 the scheme also incorporates the use of permeable materials in the front and rear gardens.
- 4.82 The Energy and Sustainability Statement demonstrates how the proposed development will secure a 74% reduction in carbon emissions when compared to the building regulations baseline and a 47.5% carbon emissions offset from low/zero carbon technologies. The scheme therefore achieves reductions in excess of Local Plan and London Plan targets (20% from low/zero carbon technologies and 50% offset overall).
- 4.83 As part of the energy and sustainability work a Thermal Comfort Assessment has been undertaken which considers overheating. This identifies a number of rooms within the apartments which are at risk of overheating (particularly due to the orientation of the building) and whilst measures have been proposed in line with the cooling hierarchy these are insufficient to pass the assessment and active cooling is therefore required and justified.

- 4.84 The proposed development therefore accords with the core principles of sustainable development set out in the Local Plan.

Transport

- 4.85 Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. Policy T2 seeks to limit the availability of car parking and requires all new development to be car-free.
- 4.86 The proposed development provides two cycle spaces per unit in accordance with Policy T1 and will secure by legal agreement to ensure that future occupants are aware that they are not entitled to on-street parking permits in accordance with Policy T2.

Trees and biodiversity

Trees

- 4.87 The application is supported by an Arboricultural Method Statement which considers the existing trees on the site and those neighbouring the site. No trees are proposed to be removed as part of the development, in line with Policy A3 'Biodiversity'. The submitted Assessment identifies a mature Category A Oak tree at the front of the property and five Category B and C trees on the neighbouring site of Nos. 22 and 24.
- 4.88 As the proposal retains the existing front garden arrangement as far as possible the implications of any development impacting the Oak tree (T1) are minimised whilst precautions during the construction phase, including tree protection fencing and constructing the side path ramp on mini screw piles with a ground beam above ground level support stub columns for the ramp platform. The façade retention system will also be founded on mini screw piles in the small part of the RPA of the neighbouring pollarded Lime tree (T2) that it extends into during construction.

- 4.89 The proposed development will also extend in the vicinity of the neighbouring Lime (T3 / T5) and London Plane (T4) trees. However, a survey of the boundary wall between the trees and the site has identified that there are tree roots below the foundations of the wall and that the foundations are very shallow. The wall is also built on subsoil that could shrink or swell, which is consistent with cracking that is evident on the external walls of No.26. It is therefore recommended by the structural engineer that preventative measures are undertaken to underpin the wall so that the bases of the underpins are outside the tree roots influence zone. It is recommended that this is undertaken regardless of any proposals to develop the site. Underpinning will remove all possible claims of actionable nuisance caused by trees.
- 4.90 Underpinning will involve cutting back of roots. This would be carried out with arboricultural supervision to ensure that roots are cut back as cleanly as possible at 90 degrees to their axis at the edge of excavation. This is achieved by sharp hand saws, loppers and planing back with a device such as an Eder trough cutter. London Plane trees and Limes are particularly tolerant of root pruning. This is why they are the most common pavement trees managed by highways departments. Subsequently the roots will then adapt to the underpinning conditions, thus will not be impacted by the proposed development.
- 4.91 In addition to the above, T1 would be fenced securely during the works and pruning would be required to T2, T3 and T4 to facilitate scaffolding for the construction of the property. There is evidence that these trees have been pruned back in the past. T4 has been reduced and reshaped on the neighbours side and to a far lesser extent over the boundary of No. 26 which it currently overhangs. It is proposed that T4 would be pruned back to the boundary as part of the works.

- 4.92 The proposal therefore ensures that all existing trees are retained and the provision of the Tree Protection Plan and Arboricultural Method Statement ensures that all neighbouring trees will be satisfactorily protected during the demolition and construction phase of development in accordance with Policy NE2 of the Neighbourhood Plan.

Biodiversity

- 4.93 In terms of biodiversity, the site offers limited and previously modified habitat within the proposed works footprint, with the low distinctiveness grassland and moderate distinctiveness individual tree at the front of the property being retained. The rear of the property and proposed area of re-development is comprised fully of urban sealed land of negligible ecological value. Tree branches and ivy were noted to be encroaching from the eastern boundary but these are outside of the proposed development footprint. It can therefore be concluded the proposed works area does not host any priority habitats (NERC, 2006) or will adversely affect any habitats of moderate or higher distinctiveness.
- 4.94 Given the proposed works will only impact developed lands, it has been concluded the proposed development falls below the BNG requirement threshold under the *De minimis exemption* as defined in The Biodiversity Gain Requirements Regulations, 2024.

6. CONCLUSION

- 6.1 This Planning Statement is submitted in support of an application for demolition behind the front façade of 26 Rosslyn Hill and the erection of a replacement three storey building, with accommodation in the roof, to provide three residential apartments, together with rear garden boundary wall, hard and soft landscaping and associated works.
- 6.2 The application has demonstrated that demolition behind the front façade would be the least carbon intensive option in comparison to other retrofit and refurbishment and extension options and thus is the most sustainable option for the site. Retaining and refurbishing the front façade preserves and enhances the element of the existing building's significance that most contributes to the character and appearance of the Conservation Area.
- 6.3 The provision of three accessible apartments, in the context of the Council's serious shortfall in meeting its housing needs, should be attributed substantial weight, in the planning balance, where the presumption in favour of sustainable development and the 'tilted balance' applies. In these circumstances, the NPPF states that for decision-takers this means granting permission unless any adverse impacts of doing so would demonstrably outweigh the benefits.
- 6.4 The proposed development has been sensitively designed so that it would not adversely impact on neighbouring properties, and it would sit comfortably alongside existing and consented buildings, respectful of their scale and settings.
- 6.5 No harm has been identified to any heritage assets. In fact, the proposed development has been found to have a minimal and neutral to positive impact on the character and appearance of the Conservation Area and the setting of listed buildings. Should there be any perceived harm to designated or non-designated heritage assets then that level of harm must be at the very lowest

end of less than substantial. Any harm would therefore be outweighed by the number of public benefits that arise from this proposal:

- Delivery of three residential apartments;
- Securing the optimum viable use of the site for housing;
- Development of suitable brownfield land and under-utilised building for housing;
- Delivery of housing that is safely accessible to the disabled;
- Financial contribution of £41,480 towards affordable housing;
- Enhanced visual appearance of front of building and site;
- Reinstatement of rear garden and residential curtilage; and
- Delivery of sustainable and energy efficient development that significantly reduces carbon emissions below building regulations and through the use of low/zero carbon technologies.

6.6 As such, there are no adverse impacts that would demonstrably outweigh the benefits of the scheme and the presumption in favour of sustainable development. The proposal thus accords with relevant policies in the Development Plan and therefore planning permission should be granted.