



33 Shore Road  
Holywood  
Co. Down  
BT18 9HX

t. 028 9042 1011

f. 028 9042 5123

e. [info@mbaplanning.com](mailto:info@mbaplanning.com)

w. [www.mbaplanning.com](http://www.mbaplanning.com)

25 June 2015

Mr Obote Hope  
Camden Planning  
London Borough of Camden  
5 Pancras Square  
c/o Town Hall,  
Judd Street  
London  
WC1H 9JE

Dear Mr Hope

#### **CAMDEN: 4 LANGLAND GARDENS NW3 5PB- 2015/3036/P**

1. This letter is an objection to full application **2015/3036/P** that seeks consent for '*excavation of the single storey basement for the provision of 2 x 3bed self-contained flats from the existing 2 x 2bed units and the creation of lightwells to the rear elevation under the footprint of the existing residential flats.*'
2. It is submitted on behalf of Mr Peter Kukieslki and Mrs Cynthia Rand Kukieslki who live in No. 2 Langland Gardens, the semi-detached pair of the application site, who objects because this is a thoroughly poorly thought out application that:
  - fails to preserve or enhance the character and appearance of the Redington/ Frognal Conservation Area- the principle heritage asset of relevance to which the application site makes a positive contribution;
  - fails to provide a satisfactory standard of internal accommodation;
  - is contrary to the Council's Basement Policy and supporting documents relating to flooding;
  - will result in the loss of trees of special amenity value;
  - construction issues; and
  - traffic issues.

#### **The Application Site**

3. No. 4 is a 3-storey semi-detached dwelling with a Dutch gable on the east side of Langland Gardens that has been subdivided into 6no. flats.

**London Office:**  
Michael Burroughs Associates  
(England)  
93 Hampton Road  
Hampton Hill, Middlesex  
TW12 1JQ  
t. 020 8943 8800  
f. 020 8943 2781  
e. [info@mbaplanning.com](mailto:info@mbaplanning.com)

**Michael Burroughs**  
BA MRTPI FRSA  
**Diana Thompson**  
BSc (Hons) Dip TP MRTPI

**Richard O'Toole**  
BSc (Hons) MSc MRTPI  
**Jennifer Mawhinney**  
MA (Hons) MSc MRTPI

**Emma Murray**  
BSc (Hons) MSc MRTPI  
**Dermot Monaghan**  
BSc (Hons) MSc MRTPI



4. The buildings in the surrounding area are also large 1890s red brick semi-detached dwellings with small single storey rear projections.

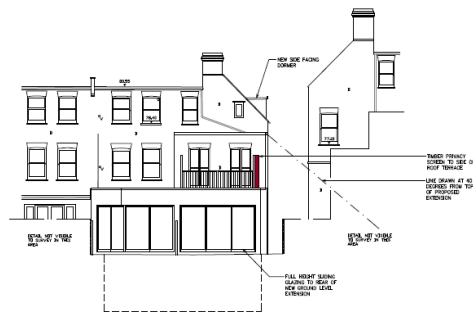


5. The site is within the Redington/Froggnal Conservation Area. The application property is identified as a positive contributor to its character and appearance in the 2011 Conservation Area Appraisal.

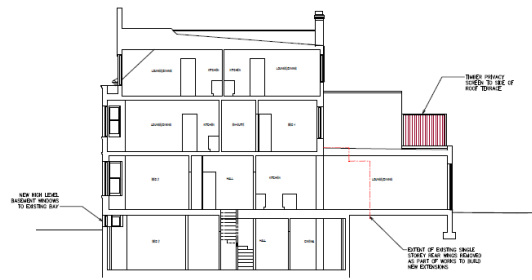
### **Planning History**

6. The following planning history is relevant:
7. Planning permission was granted on 14 February 1983 for *'change of use and works of conversion to create six one-bedroom flats for the elderly, based on Category 1 accommodation as defined in MHIG Circular 82/69'*.
8. **2013/7790/P:** On 30 January 2014 the Council granted a lawful development certificate for the use of the property as six apartments. The Council accepted the flats had been occupied for a period of time by tenants who are not said to be 'elderly'. The flats do not share communal facilities and no care facilities are provided onsite.
9. **2015/0315/P:** On 17 March 2015 planning permission was granted for the *'erection of a 2 storey rear extension between ground and first floor level, installation of new window to the front elevation, installation of balustrade with side screening for a proposed terrace at first floor and erection of a dormer extension to the side.'*

10. The ground floor extension is 3.9m in height x 10.2m in width x 7.5m in depth. The first floor projection extends 4.9m in width x 4.5m in depth x 3.3m in height.



**Consented Rear Elevation**



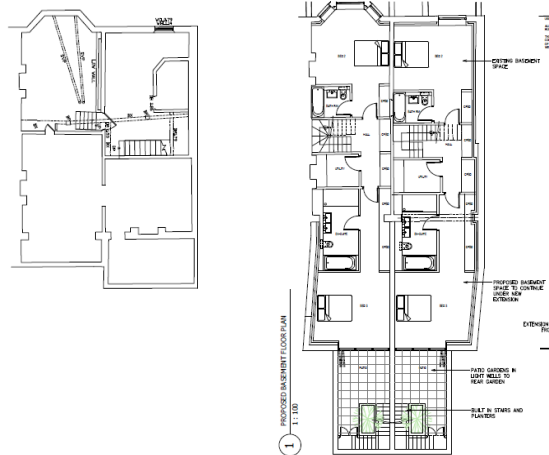
**Consented Long Elevation**

**Deficiencies in the Application**

11. The application is deeply flawed.
12. First, the extent of the existing basement shown on the application plans is incorrect. The application plans show the existing basement extending beneath the footprint of the original house. This is not true. It is limited to the front of the property. The area to the rear is unexcavated. Furthermore the cellar underneath the front portion of the house is not habitable because its height ranges from 1.53m to 1.86m.
13. Second, the application description is misleading. It does not give a complete description of the proposal because it fails to refer to all elements of proposed operational development. It runs the risk that the wording of the application advertisement and neighbour notification based on it could be seriously inaccurate and so any decision that issues could be vulnerable to challenge.
14. Third, the BIA submitted with the application as policy requires underestimates the extent of the basement and claims it extends 5m from the rear of the property, when it actually extends 7.5m plus the 6m lightwell.
15. These undermine the whole premise of the application, which is plainly void.

**The Proposal**

16. The proposed basement extends from the front of the building to 7.5m from its rear. It requires two large lightwells with patios each extending a further 6m into the garden. It also involves enlarging the lower groundfloor windows on the front elevation and creating larger lightwells in front of the house.
17. The additional accommodation in the basement increases the density of the permitted scheme by changing the 2x2 bed units to 2x3 bed units.



Existing

Proposed

### Grounds of Objection

#### a. Adverse effect on the character and appearance of the Redington/Froggal Conservation Area.

18. The Conservation Area is the relevant designated Heritage Asset in this case. The application property is identified in the CAS as making a positive contribution to its character and appearance.
19. Paragraph 128 of the NPPF requires the impact of new development on the significance of heritage assets to be assessed. Astonishingly the Design and Access Statement accompanying the application completely ignores this requirement because it fails to make an assessment of the impact of the proposal on the positive contribution the host property makes to the Conservation Area as a whole. If it had done so, it would have noted that none of the properties in Langland Gardens have substantial front light wells with enlarged lower ground floor windows.
20. Furthermore the light well patios at the rear will be visible from surrounding houses and are incongruous and inconsistent with the original planned development.
21. The illumination and light spill from the basement lightwells will further will harm the appearance of the garden setting and cause nuisance to the adjoining property.
22. The proposal will materially harm the building's architectural character and so is contrary to Local Plan Policy CS14 because it fails to preserve or enhance the character and appearance of the Conservation Area – it is harmful to it.

#### b. Failure to Provide a Satisfactory Standard of Internal Accommodation

23. The basement bedrooms are lit by lightwells. They will have low levels of natural light, outlook and natural ventilation. It is surprising that no daylight report was required by the Council prior to registration of the application. It is evident from CPG that the Council considers the availability of daylight and sunlight to habitable rooms to be a material planning consideration and this would be wholly unreasonable to ignore in the decision on the application.

24. There is also no resolution proposed of the issue of users of the communal garden looking down into the private patio lightwells and the habitable rooms lit by their large windows.
25. Finally the proposal will result in the loss of a significant area of garden space. The proposed basement and lightwells extend a massive 13m into the garden. Flats 3, 5 and 6 have no terraces and there will be very little communal garden available to them if the application is permitted.

#### **c. Basement Impact and Policy**

26. The proposal is contrary to Council's **CPG4 (Basements and Lightwells)** which says the Council will discourage lightwells that are visible from the street in areas where these are not a feature of the street and will discourage large lightwells in rear gardens. The Council clearly requires a stricter approach in Conservation Areas.
27. The planning application was supported by a Basement Impact Assessment Report prepared by Soiltechnics dated April 2015.
28. **CPG4** identifies Langland Gardens as a street that is at risk of surface water flooding (**Annex 1**). **Para 2.41** states that all applications for basement extensions within streets identified as either 'primary' or 'secondary' locations will be expected to include a Flood Risk Assessment with any application for a basement development. There is no FRA with this application and it is very surprising that it was registered without it.
29. As the proposed basement contains 4no. additional double bedrooms, permitting it would be entirely contrary to the **Local Plan Policy DP27 (Annex 2)** which states that the Council will not allow habitable rooms and other sensitive uses for self-contained basement flats and other underground structures in areas at risk of flooding.

#### **d. Structural Stability**

30. The objector's house is the semi-detached pair of the application building and the BIA fails to appropriately consider the impact of the proposal on the adjoining property. It indicates the party wall will be underpinned by traditional construction methods and the perimeter of the basement will be enclosed by a retaining wall on the east and west facing walls to the extended lower ground floor, which will support the consented above ground works.
31. The BIA does not provide conclusive evidence on the depth of the existing foundations as excavation was not carried out below 1.5m in the relevant trial pit. In these circumstances the calculation of predicted ground movements and structural impact do not represent sound estimates as the existing and neighbouring foundation conditions below ground are not known.

32. The proposed basement will significantly increase the differential depth of foundations between both properties. The BIA fails to adequately consider the predicted structural damage to No. 2 and what mitigation measures are proposed.

**e. Trees**

33. Question 15 of the application form states there are no trees on the application site and that there are no trees or hedges adjacent to the proposal that could influence the development or might be important as part of the local landscape character.
34. This again is grossly misleading because there are mature trees on the site:



Trees at No 4 at boundary with No. 2



View from No 2 towards site



View from rear of No 2

35. The arboricultural detail in Soiltechnics BIA is conflicting. **Para 2.1** indicates “there are gardens both to the front and rear principally laid to grass with some trees.” **Para 7** says “no major vegetation will be removed to accommodate the extension building.”
36. However, **Para 12.6** states: “two trees will be removed which are growing close to the rear (South Eastern) garden boundary. Removal of these trees will not affect nearby properties.” Furthermore, the BIA site investigation shows tree roots were observed within the boreholes.
37. It is most surprising in these circumstances that the application was validated without a full Tree Survey and plan in accordance with BS5837, particularly as the application plans fail to show the extent of basement and excavated patios within the RPAs of the existing trees.
38. The application fails to demonstrate that the proposal will not harm important trees that play a significant landscape role in defining the character of this Conservation Area.

#### **f. Constructing the Basement**

39. The objector has profound concerns about the buildability of the basement given that their property is attached to it. It is difficult to understand how its impact can be satisfactorily mitigated because it is simply too large and disproportionate to the application property.

#### **g. Traffic Issues**

40. The road is exceptionally busy during morning rush hour and becomes downhill only traffic with the volume of commuters further north in Hampstead. There is parking on both sides rendering it effectively a one lane street. Damage will also be caused to the road from construction vehicles and parking will be problematic in the wider area due to construction vehicles parking.
41. The proposed increased occupation of the building, from the permitted 2-bed units becoming 3-bed units, will exacerbate the existing parking problems in this heavily parked area in the long term.

#### **Conclusion**

42. This analysis shows this proposal is deeply flawed for the following reasons:
- There are very significant errors and omissions from the application and the accompanying documents (lack of Heritage Impact, Arboricultural and Daylight and Sunlight reports and fundamental deficiencies in the application plans, the application description and the BIA) that means that any decision based on them would not have taken account of all material planning considerations, with an obvious vulnerability to legal challenge;
  - It is inconsistent with local planning policy because it proposes basement habitable rooms in a flood risk area; requires enlarged front lightwells; materially reduces the amenity space available to three flats in the application building that lack balconies and is harmful to the character and appearance of the Conservation Area;
  - It is inconsistent with national policy in the NPPG because it has not considered the impact of the proposal on the relevant Heritage Assets.
43. This is a deeply flawed proposal and we respectfully ask the Council to refuse it.
44. We wish to be kept informed during the course of the application and request a copy of the Case Officer Report when this is completed.

Yours sincerely

Emma McBurney

**Michael Burroughs Associates**

# Annex 1

Belfast Office:

33 Shore Road  
Holywood  
County Down  
BT18 9HX

t. 028 9042 1011  
e. [info@mbaplanning.com](mailto:info@mbaplanning.com)  
w. [www.mbaplanning.com](http://www.mbaplanning.com)

London Office:

93 Hampton Road  
Hampton Hill  
TW12 1JQ

t. 028 9042 1011  
e. [info@mbaplanning.com](mailto:info@mbaplanning.com)  
w. [www.mbaplanning.com](http://www.mbaplanning.com)

michael burroughs associates



Camden Planning Guidance

# Basements and lightwells

CPG 4

London Borough of Camden



## Streets at risk of surface water flooding

Abbey Road	1975	Jeffreys Street	2002
Aberdare Gardens	1975	Kelly Street	1975 and 2002
Achilles Road	2002	Kentish Town Road	1975
Adamson Road	2002	Kidderpore Gardens	1975
Agamemnon Road	2002	Kilburn High Road	1975
Ajax Road	2002	Kilburn Priory	1975
Aldred Road	2002	Kingdon Road	2002
Arkwright Road	1975 and 2002	Kingsgate Road	1975
Arkwright Road	1975 and 2002	Lady Margaret Road	2002
Avenue Road	2002	Lambolle Road	1975
Belsize Lane	1975 and 2002	Lancaster Drive	2002
Belsize Park Gardens	1975	Lancaster Grove	1975 and 2002
Belsize Road	1975 and 2002	Langland Gardens	1975
Boundary Road	1975	Lowfield Road	1975
Broadhurst Gardens	1975	Lyncroft Gardens	2002
Broomsleigh Street	1975	Lyndurst Gardens	1975
Bullbarrow, Abbey Road Estate	1975	Mansfield Road	1975
Canfield Gardens	1975 and 2002	Maygrove Road	1975
Cannon Hill	1975 and 2002	Menelik Road	2002
Caversham Road	2002	Messina Avenue	1975
Chalcot Gardens	1975	Mill Lane	1975 and 2002
Chesterford Gardens	2002	Nassington Road	2002
Cotleigh Road	1975	Oak Village	1975
Dennington Park Road	1975 and 2002	Ornan Road	2002
Edis Street	1975	Pandora Road	1975 and 2002
Egbert Street	1975	Park End	1975
Fairfax Road	2002	Parkhill Road	1975 and 2002
Fairhazel Gardens	1975 and 2002	Parliament Hill	2002
Fellows Road	1975	Platt's Lane	1975 and 2002
Ferncroft Avenue	1975	Primrose Hill Road	1975 and 2002
Finchley Road	2002	Prince of Wales Road	2002
Fleet Road	2002	Princess Road	1975
Fordwych Road	1975	Priory Road	2002
Frognaal Gardens	1975	Priory Terrace	1975
Gaisford Street	2002	South End Road	2002
Glenhurst Avenue	2002	South Hill Park	2002
Gloucester Avenue	1975	South Hill Park Gardens	2002
Goldhurst Terrace	1975 and 2002	Sumatra Road	1975 and 2002
Gospel Oak Estate	1975	Swains Lan	1975
Greencroft Gardens	1975 and 2002	Tanza Road	2002
Hampstead Lane N6	1975	Templewood Avenue	2002
Harben Road	2002	Templewood Gardens	2002
Harley Road	1975	Wendling, Haverstock Road	2002
Hawley Road	1975	West End Lane	2002
Heath Street	1975	Westbere Road	2002
Hemstal Road	1975	Willow Road	1975 and 2002
Highgate Road	1975	Winchester Road	1975
Hillfield Road	1975 and 2002	Windmill Hill	1975
Holmdale Road	1975 and 2002	Woodchurch Road	2002
Ingestre Road	2002	Woodsome Road	1975
Inglewood Road	2002	York Rise	1975

Source: Floods in Camden, Report of the Floods Scrutiny Panel, London Borough of Camden 2003, Appendix 4, Flooded Roads in Camden 1975 and 2002.

## Other permits and requirements

### Building Regulations

- 2.75 A Building Regulations application is required when converting an existing basement to habitable use, excavating a new basement or extending an existing basement. Due to the nature of the work, in which different problems can arise, it is advised that the “deposit of plans route” is adopted to obtain building regulation approval. This is the most widely known procedure and involves you submitting plans which show full details of the work. These plans are then checked for compliance with the Building Regulations and, if satisfactory, an Approval Notice is issued.

**BUILDING REGULATIONS APPLICATION:**

The Building Regulations apply to most ‘Building Work’ and you need to make an application to our Building Control department before proceeding. Further details are available from the Building Control section of the Council’s website.

- 2.76 We recommend that you follow the full plans procedure unless the work is of a very minor nature. The Full Plans procedure gives greater protection to the building owner.
- 2.77 As part of the application it will be necessary to submit a full site investigation and a consulting civil or structural engineers report on the investigation and development proposals.
- 2.78 Building Regulations are set out by various technical parts (A-P) and the principal requirements include the following:
- Part A Structure
  - Part B Fire Safety
  - Part C Site preparation and resistance to contaminants and moisture
  - Part E Resistance to passage of sound
  - Part F Ventilation
  - Part H Drainage
  - Part J Combustion appliances
  - Part K Protection from falling collision and impact
  - Part L Conservation of fuel and power
  - Part M Access and use of building
  - Part P Electrical safety
- 2.79 The above are available to be viewed on the Communities website [www.communities.gov.uk](http://www.communities.gov.uk). Additional guidance can be obtained from the Approved Document: Basements for Dwellings 2nd edition 2004 (superseded but provides the framework for satisfying the building regulations).

### Highway licence

- 2.80 If you need to put a skip or building material on the public highway, or if you wish to erect a scaffold, hoarding or gantry you will need to apply for a license under the Highways Act. You will also need to obtain the consent of the appropriate highway authority if your proposal involves any work under any part of the highway or footway. The Council is the highway authority for most streets in the Borough, although for some major roads Transport for London act as the highway authority. For more information about the highway authority or licensing matters, please visit the Council's website at <http://www.camden.gov.uk/ccm/navigation/transport-and-streets/> or contact the Council's Highways Management Team on telephone 020 7974 6956 (see Appendix 1).

### Party wall agreement

For most basement developments you will need a party wall agreement with your neighbour(s). This includes when excavation is

- within 3 metres of a neighbouring structure;
  - would extend deeper than that structure's foundations; or
  - within 6 metres of the neighbouring structure and which also lies within a zone defined by a 45 degree line from that structure.
- 2.81 The Council is not itself involved in Party Wall agreements, but a guidance note explaining the procedures can be found on the Council's website or from the Planning Portal website [www.planningportal.gov.uk](http://www.planningportal.gov.uk).

### Freeholder permission

- 2.82 Most residential leases will require some form of landlord permission for improvements and alterations. This is also the case for leasehold Housing Revenue Account (HRA) property, where permission from Camden's Housing Department is required for any improvements and alterations, including basement development.

### Other mitigation measures

In addition to the measures identified in 2.31 above, the impact of a basement scheme, or other underground development, can be mitigated by implementing a number of measures, including:

- preparing a detailed drainage plan;
- preparing a construction management plan (see CPG6 Protecting and improving the quality of life chapter on Construction Management Plans);
- ensuring that contractors adopt the practices outlined within the Demolition Protocol and the Considerate Constructors Scheme;
- consulting your neighbours prior to submitting the planning application;

- informing neighbours when works are beginning and how long they will last, and any changes of plan;
- instructing developers to arrange noisy work at periods when it least inconveniences neighbours, and not blocking neighbouring entranceways; and
- having regard to the Guide for Contractors working in Camden, Feb 2008, which is available on the Council's website.

**Index**

Basement impact assessment .....	9	Mitigation measures .....	31
Basements .....	7	Neighbours .....	22
Building Regulations.....	30	Party wall .....	31
Burland category .....	13	Permitted development.....	8
Conservation areas .....	25	Qualifications .....	10
Doors .....	25	Railings .....	27
Grilles .....	27	Size .....	24
Groundwater flow .....	15	Streets at risk.....	29
Highway licence .....	31	Surface flow .....	20
Land stability .....	18	Sustainable construction .....	23
Lightwells.....	7, 27	Walls .....	25
Listed building consent.....	25	Windows .....	25
Listed buildings.....	25		

## Annex 2

Belfast Office:

33 Shore Road  
Holywood  
County Down  
BT18 9HX

t. 028 9042 1011  
e. [info@mbaplanning.com](mailto:info@mbaplanning.com)  
w. [www.mbaplanning.com](http://www.mbaplanning.com)

London Office:

93 Hampton Road  
Hampton Hill  
TW12 1JQ

t. 028 9042 1011  
e. [info@mbaplanning.com](mailto:info@mbaplanning.com)  
w. [www.mbaplanning.com](http://www.mbaplanning.com)

michael burroughs associates

# **Camden Local Development Framework**

# **Camden Development Policies**

**Adoption version 2010**



provision of cycle parking can be found in DP18 - *Parking standards and limiting the availability of car parking.*

26.12 Outdoor amenity space provides an important resource for residents, which is particularly important in Camden given the borough's dense urban environment. It can include private provision such as gardens, courtyards and balconies, as well as communal gardens and roof terraces. The Council will expect the provision of gardens in appropriate developments, and particularly in schemes providing larger homes suitable for families. However, we recognise that in many parts of the borough this will not be realistic or appropriate. In these locations, the provision of alternative outdoor amenity space, for example, balconies, roof gardens or communal space will be expected. These amenity spaces should be designed to limit noise and disturbance of other occupiers and so not to unacceptably reduce the privacy of other occupiers and neighbours.

#### Key references / evidence

- Air Quality Action Plan 2009-13
- Camden's Noise Strategy, 2002
- Planning Policy Guidance (PPG) 24: Planning and Noise
- The London Plan (consolidated with alterations since 2004); Mayor of London; 2008
- Cleaning London's Air: The Mayor's Air Quality Strategy (2002)
- Souder City - The Mayor's Ambient Noise Strategy; Mayor of London; 2004
- Institution of Lighting Engineers web-site, <http://www.ile.org.uk>

## DP27. Basements and lightwells

27.1 The Core Strategy policy CS14 outlines our overall strategy to promoting high quality places. It seeks to secure development of the highest standard of design which respects local context and character. Policy DP27 helps to deliver this by setting out our detailed approach to basements and lightwells. With a shortage of development land and high land values in the borough, the development of basements is becoming increasingly popular as a way of gaining additional space in homes without having to relocate to larger premises. Basements are often also included in developments in the Central London part of Camden and used for various purposes including commercial, retail and leisure uses, servicing and storage.

### Policy DP27 - Basements and lightwells

In determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other underground development that does not cause harm to the built and natural environment and local amenity, and does not result in flooding or ground instability. We will require developers to demonstrate by methodologies appropriate to the site that schemes:

- a) maintain the structural stability of the building and neighbouring properties;
- b) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
- c) avoid cumulative impacts upon structural stability or the water environment in the local area;

and will consider whether schemes

- d) harm the amenity of neighbours;
- e) lead to the loss of open space or trees of townscape or amenity value;

- f) provide satisfactory landscaping, including adequate soil depth;
- g) harm the appearance or setting of the property or the established character of the surrounding area; and
- h) protect important archaeological remains.

The Council will not permit basement schemes which include habitable rooms and other sensitive uses in areas prone to flooding.

In determining applications for lightwells, the Council will consider whether:

- i) the architectural character of the building is protected;
- j) the character and appearance of the surrounding area is harmed; and
- k) the development results in the loss of more than 50% of the front garden or amenity area.

27.2 Although basement developments can help to make efficient use of the borough's limited land it is important that this is done in a way that does not cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas or the natural environment.

27.3 For larger schemes, where a basement development extends beyond the footprint of the original building or is deeper than one full storey below ground level (approximately 3 metres in depth) the Council will require evidence, including geotechnical, structural engineering and hydrological investigations and modelling from applicants to ensure that basement developments do not harm the built and natural environment or local amenity. The level of information required will be commensurate with the scale and location of the scheme. These larger schemes will be expected to provide evidence against each of the considerations (a) to (h) in policy DP27. Smaller schemes will be expected to submit information which relates to any specific concerns for that particular scheme or location (e.g. any history of flooding at the site or in the vicinity of the site, the presence of underground watercourses, proximity to water bodies such as the ponds on Hampstead Heath, structural instability of the developed or of neighbouring properties, or unstable land). The Council will assess whether any predicted damage to neighbouring properties from the development is acceptable or can be satisfactorily ameliorated by the developer. Applicants should contact the Council's Duty Planning Service about the level of information that should be provided for a particular scheme. Where hydrological and structural reports are required, they should be carried out by independent professionals (e.g. Chartered Structural Engineers). As there is potential for the effects of a basement development on the water environment, subsoil etc to extend beyond the site itself and its neighbouring properties, such reports should also consider the potential wider impacts of basement schemes.

27.4 Many potential impacts to the amenity of adjoining neighbours are limited by underground development. However, the demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. The Council will seek to minimise the disruption caused by basement development and may require Construction Management Plans to be submitted with applications. Please see our Camden Planning Guidance supplementary document for further information on Construction Management Plans.

27.5 When considering applications for basement extensions, Building Control will need to be satisfied that effective measures will be taken during excavation, demolition and construction works to ensure that structural damage is not caused to the subject building. (Demolition is only a planning consideration for listed buildings and buildings which make a positive contribution to conservation areas.)

27.6 Government Planning Policy Statement (PPS) 25 - *Development and Flood Risk* states that inappropriate development should be avoided in areas at risk of flooding and