

PLANNING STATEMENT

55 FITZROY PARK, HIGHGATE, LONDON, N6 6JA



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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by SM Planning in support of a planning application submitted on behalf of Geoffrey and Ryan Springer and Lynne Turner-Stokes MBE for the demolition of the existing property and the construction of five detached homes at 55 Fitzroy Park, Highgate, London, N6 6JA.
- 1.2 The site owner is Professor Lynne Turner-Stokes MBE, whose family have owned the land for over 75 years. The application proposes three homes along the Fitzroy Park frontage, for Professor Turner-Stokes and her two daughters. The remaining two plots, to the rear, are for Geoffrey Springer and Ryan Springer who have lived in the road since 1987. The proposed development is therefore a family led scheme, allowing these local connections to continue.
- 1.3 This statement sets out the planning justification for the proposed development and assesses the proposals against national planning policy and the development plan. The document should be read in conjunction with all other supporting documentation.

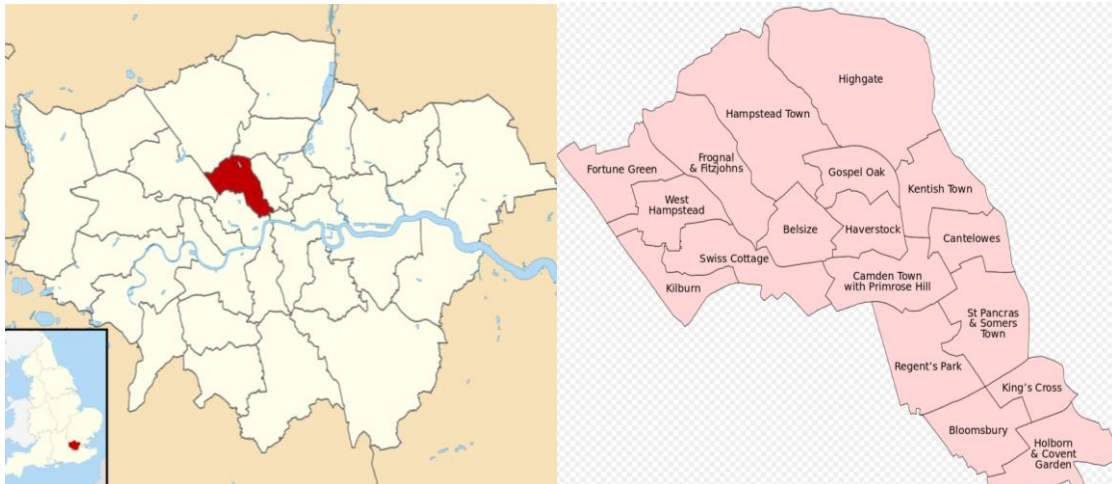
2. EXECUTIVE SUMMARY

- 2.1 This planning application seeks full planning permission for the demolition of the existing dwelling and its replacement with five detached homes at 55 Fitzroy Park, Highgate, London.
- 2.2 The site is a private road and in terms of constraints, the site is located within the Highgate Conservation Area and is defined as private open space by the Local Plan. In addition, the site is located adjacent to Hampstead Heath which is identified as Metropolitan Open Land (MOL).
- 2.3 The proposals have been prepared through a detailed pre-application process which has involved relevant consultees and also key local stakeholder groups and members of the public. The proposed development has evolved in response to the feedback received and seeks to meet not only planning policy requirements but also the wider aspirations of the local community.
- 2.4 The application site is located in close proximity to transport links and a number and range of local services and opportunities. The site is therefore inherently sustainable and its redevelopment would accord with the principles of the NPPF which outlines a presumption in favour of sustainable development. In addition, Policy H2 of the New London Plan provides for a presumption in favour of small, well designed (1-25 units) housing developments.
- 2.5 The Proposed Development is a high quality, site specific response that will enhance the appearance of the site and its contribution to the local area, adding to the rich legacy of impressive family homes in the area. The homes have been designed by two architectural practices, and the distinct, exemplary and high quality detailed design of the houses will ensure an appropriate grain and character to the site.
- 2.6 The plot ratios are between 10.9% and 18.5% (10.9/16.5/16.7/17.1/18.5) which is within the lower quartile when compared with adjoining sites also within the same private open space designation. Each building could fit comfortably on the plot, retaining significant areas of garden/private open space. The plot ratios are all within the lowest 9 of the 21 plots in the immediate surroundings
- 2.7 The proposed development will enhance the quality of the townscape of the area and the character and appearance and significance of the Highgate Conservation Area. There will be no effect on the setting of any listed buildings.
- 2.8 In views from Hampstead Heath, both the existing and proposed houses are screened by existing trees during summer and winter months so the development will not be visible. Consequently, the proposed development will not harm the open character and setting of the adjacent Heath open space and it will preserve the openness of the MOL.
- 2.9 The existing landscape features of note on the site will be retained and enhanced. The pond will become the principal landscape feature on site. The boundary edges will be enhanced with a high-quality native mixed wild hedge, combined with a mixture of semi-mature and heavy standard trees. The openings in the hedgerow along Fitzroy Park required for access have been coordinated with the gaps between the buildings, one of which will allow a view through to the pond, enhancing it as an area of private open space.

- 2.10 The quality and inconspicuous nature of the built development and the extent of planting proposals ensure that the development would not only preserve but enhance the private open space and this would be strengthened further by the exposure of open areas, a result of the proposed access onto Fitzroy Park; the replacement of concrete fencing with natural habitat fencing and the complete clean-up of the natural pond.
- 2.11 Ecological mitigation has been incorporated from the outset through the early provision of ecological input to the design of the development, with a number of landscaping proposals incorporated including (but not restricted to) using native hedgerows to form plot boundaries, replanting of orchard habitats including flower-rich grassland habitats, reinforcement boundary planting and increasing vegetated habitats including green roofs, which would provide valuable meadow grassland.
- 2.12 Pre-application discussions with the Council have confirmed that the provision of one car parking space per home would be appropriate in the context of this application. There is ample room for the secure parking of cycles within the site to a level that would exceed the Council's standards.
- 2.13 The application site lies outside of the archaeological priority area as defined by Camden's development plan and there are no known sources of archaeology.
- 2.14 The relationship of built development has been carefully considered in the context of the topography and distances between buildings and the absence of clear relationships with sensitive windows that could suffer substantive reductions in outlook means that there are unlikely to be any detrimental effects on levels of sunlight/daylight. The proposed homes will provide generous garden and room sizes and will meet lifetime homes standards.
- 2.15 A Construction Management Plan has been prepared in accordance with best practise and guidance notes set out in CPG6: Amenity and CPG8: Planning Obligations and Transport for London's (TfL's Standard for Construction Logistics and Community Safety (CLOCS) scheme) and Camden's Minimum Requirements for Building Construction (CMRBC).
- 2.16 In summary, the proposed development fulfils the three dimensions of sustainable development as defined by the NPPF and therefore the presumption in favour of sustainable development applies. The proposal is fully in accordance with national and local planning policy providing a scheme that contributes towards the provision of an identified local housing need as well as the overall supply of housing.
- 2.17 The planning application is further supported by a Design and Access Statement, Heritage Assessment, Arboricultural Report, Hydrological and Hydrogeological Impact Assessment, Geotechnical Assessment, Ecological Appraisal, Noise and Air Quality Construction Management Plans, Statement of Community Involvement, Sustainability Statement and a Transport Statement.

3. SITE & SURROUNDING CONTEXT

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

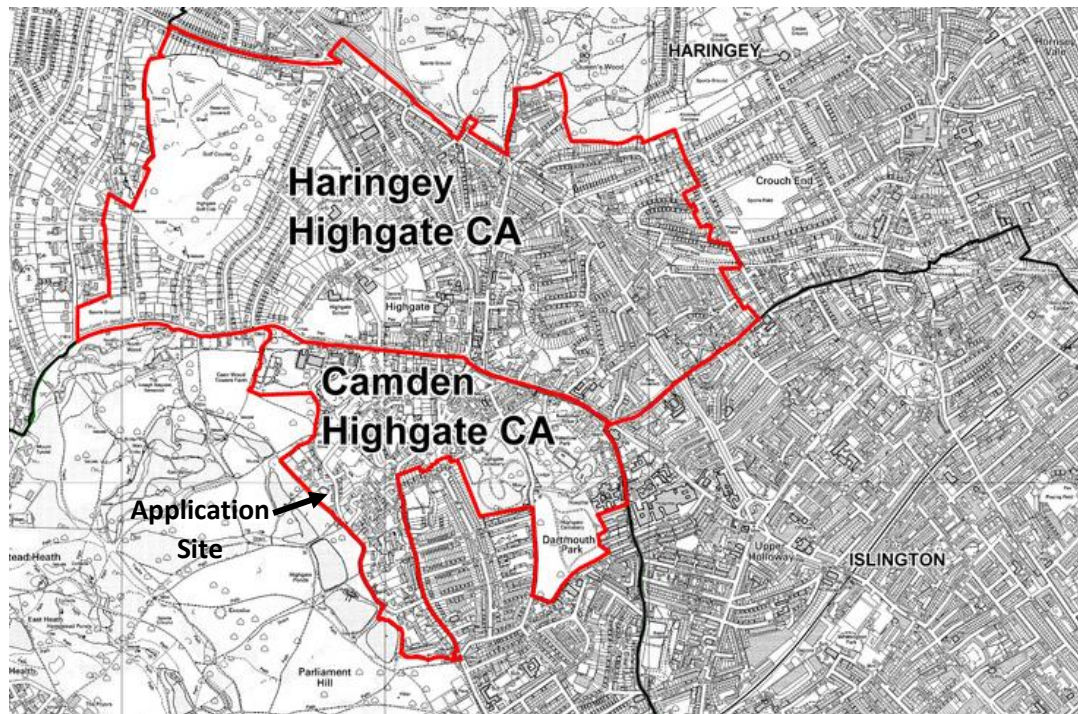


- 3.2 The ward of Highgate is a suburban area of north London at the north-eastern corner of Hampstead Heath, 7.2km north-west of Charing Cross. The ward is located on the northern fringe of the London Borough of Camden and the western fringe of the London Borough of Haringey with small portions in Islington and Barnet. The area retains many green expanses including the eastern part of Hampstead Heath, three ancient woods, Waterlow Park and the eastern-facing slopes known as Highgate Bowl. At the centre of the ward is Highgate village, a collection of largely Georgian shops, pubs, restaurants and residential streets, interspersed with diverse landmarks such as St Michael's Church and steeple, St. Joseph's Church and its green copper dome, Highgate School, Jacksons Lane Arts Centre in a Grade II listed former church, the Gatehouse Inn dating from 1670 and Lubetkin's 1930s Highpoint buildings. Highgate is well served by public transport with a Northern Line station and direct bus routes to the City, St Pancras International and Brent Cross Shopping Centre.

Conservation Area

- 3.3 The application site is located within **Camden's Highgate Conservation Area** which comprises a variety of plan forms. The historic village, centred around the High Street, has a relatively random pattern of plot sizes which tends to reflect the importance of the individual properties. The Conservation Area also contains late Georgian and Victorian terraced developments which conform to a regular plot size, typical of speculative development of the period.
- 3.4 The tight knit and informal development, and the early 19th century speculative development are in marked contrast with the large open areas of Highgate Cemetery, Waterlow Park and the allotments in Fitzroy Park. Further contrast is given by the large

imposing properties of Fitzroy Park set within generous landscaped gardens. The whole western boundary of the Conservation Area borders Hampstead Heath which, with the wooded landscape of the northern part of Highgate West Hill, forms a very rural character and is defined as **Metropolitan Open Lane (MOL)** by the Local Plan.



Highgate Conservation Area Boundary

- 3.5 The application site is located within sub-area 2 (Fitzroy Park) of Camden's Highgate Conservation Area Appraisal (CAA).
- 3.6 The CAA comments that Fitzroy Park, in its present form, was developed within the framework of the boundaries of older estates. As the large houses were demolished, the surrounding parkland became available for development, particularly in the 19th and 20th centuries. The character of the area is derived from the close relationship between the topography, the soft landscape and the groups or individual houses built within it. There is an overriding impression of heavy foliage and mature trees as well as the sense of open space denoted by the Heath at the bottom of the hill. There is also a sense of seclusion as the road is private and is gated at its northern end.
- 3.7 The CAA states further that that Fitzroy Park still retains its original atmosphere of houses set in large gardens with many mature trees and boundaries in keeping with the rustic character of the lane. Fitzroy Park itself is an important green pedestrian approach to the Metropolitan Open Land of Hampstead Heath, and this quality is enhanced by its informal, unmade style, which gives it a rustic appearance rare in the London suburbs. This quality is important for the setting of both the Highgate Conservation Area and Hampstead Heath, and the impact on it of any proposed development will be a major factor in assessing the appropriateness of any development proposals.

55 Fitzroy Park

- 3.8 The site is located at 55 Fitzroy Park. Fitzroy Park is a private road and is accessible via Merton Lane. Fitzroy Park is located to the north-east of Hampstead Heath and to the south of Highgate. Fitzroy Park is managed and maintained by the Fitzroy Park Residents Association and is located within the Highgate Conservation Area.
- 3.9 The application site is located at no.55 which is located on the south-western side of the lane and comprises a flat-roofed two-storey red brick 1950s dwelling, with casement and tilt-and-turn painted softwood windows. There is a slightly later two-storey extension on the northern side of the property and the house is set in generous gardens which stretch down to the northern stretch of Millfield Lane to the south as it skirts Hampstead Heath.



- 3.10 The existing home is set approximately a storey below the line of the adjacent road and is approached by a ramped driveway. The garden is extensive with an old orchard, lawn, large pond, a disused tennis court and numerous trees and hedges along all boundaries. The property is not listed nor a positive contributor to this area. The site, along with all the others between Fitzroy Park and Millfield Lane (except Dormers and Fitzroy Lodge), are designated as **Private Open Space (POS)** by the local plan which

expands on this meaning by defining the site as one of importance to nature conservation in a metropolitan context (SINC METRO).

Immediate Surroundings

- 3.11 The Fitzroy Park area contains large two to three storey family houses, set informally within large garden plots and numerous mature trees, which face both private roads of Fitzroy Park and Millfield Lane. Hampstead Heath and its chain of Highgate ponds lies immediately to the west; however, the site is not visible from the heath due to extensive tree cover.
- 3.12 Specifically, a large part of the curtilage of the application site is bounded to the north by 'The Water House', a residential property set in generous grounds that benefits from a main access from Millfield Lane and a small pedestrian access between 51 and 53 Fitzroy Park. The property comprises a two-storey house with gables and a shallow pitched roof, an angled stone-clad feature chimney reminiscent of the post-war period as well as large areas of glazing at ground floor level. The landscaped grounds include a pond (giving the house its name) and there is a separate studio building on the site.
- 3.13 No 53 bounds the remainder of the northern boundary of the application site and comprises a flat-roofed house of a cuboid form, the first floor of which is clad in horizontal white-painted weatherboarding. A garage is incorporated into the front portion of the building. The garden elevation has a first-floor balcony.
- 3.14 Bordering the southern curtilage of the site is Fitzroy Lodge which comprises a neo-Queen Anne style double-fronted house which is thought to have been constructed in the mid-1920s. Further south comprises the last house in the road, 'Apex Lodge', which is a mid-20th century house, recently modernised.



55 Fitzroy Park



Existing building – View from Fitzroy Park entrance

4. PRE-APPLICATION ENGAGEMENT

- 4.1 The Applicant has sought to consult with both the community and an extensive list of key stakeholders throughout the drafting of this application in order to inform, identify and, where appropriate, address any issues or concern throughout the pre-application period through to the submission of the application.
- 4.2 This engagement has been managed through a targeted consultation strategy including pre-application advice meetings with The London Borough of Camden, Design Review Panel meetings, stakeholder meetings, public consultation and workshops.
- 4.3 The consultation strategy has been informed by Camden's Statement of Community Involvement (2016) which sets out the standards for consultation practice.
- 4.4 A summary of the applicant's programme of extensive consultation is provided below and full details are available within the Statement of Community Involvement which accompanies the application.

Camden Pre-Application Service

- 4.5 The Applicant submitted a request for formal pre-application advice in December 2016. As part of this service, several pre-application meetings were held with Planning Officers through to May 2018. The meetings were also attended by Design, Conservation, and Highways Officers.
- 4.6 The meetings covered the key principles of the redevelopment of the site including:
- The format of the application;
 - Planning Policy;
 - Heritage;
 - Design Principles;
 - Ecology;
 - Drainage/Flood Risk;
 - Archaeology; and,
 - Highways.

- 4.7 As part of this pre-application advice service the list of supporting deliverables to accompany the submission was agreed.

Camden Design Review Panel

- 4.8 The Camden Design Review Panel is made up of 26 leading professionals and includes people working at the highest level in the fields of in architecture, landscape architecture, urban design, environmental sustainability, inclusive design, development economics and delivery.

- 4.9 The applicant has engaged in two design review panel meetings on 2 March 2018 and 11 May 2018. The meetings covered the key principles of the redevelopment of the site including:
- Heritage;
 - Layout;
 - Density;
 - Massing;
 - Height;
 - Design Principles;
 - Landscaping; and,
 - Highways.
- 4.10 An additional meeting was held with a representative from the City of London to discuss the impact on the setting of Hampstead Heath.
- 4.11 These meetings provided an opportunity for the Applicant to engage in on-going dialogue with the Council as the development of the scheme progressed.

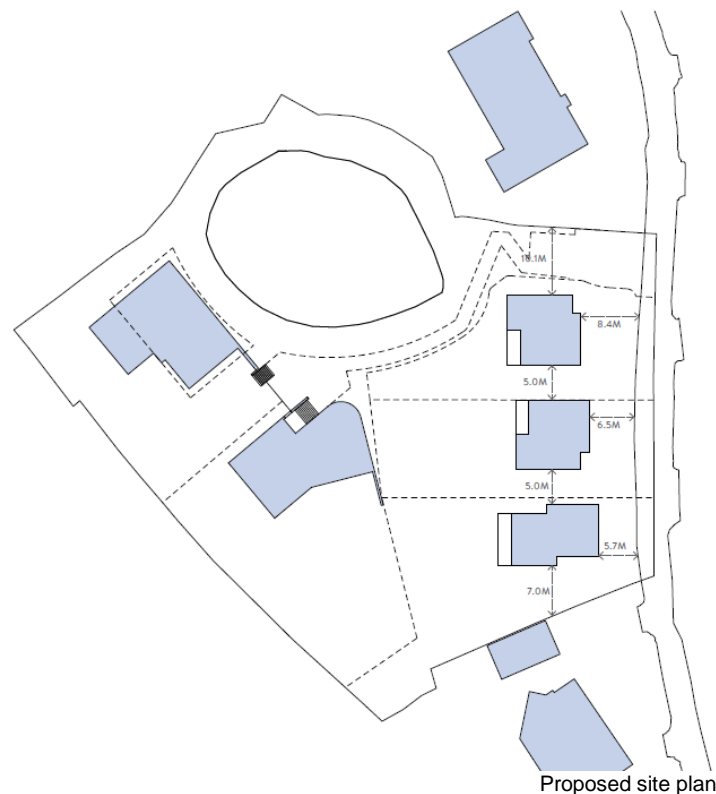
Community Consultation

- 4.12 In addition to the above, a public exhibition took place at the North London Bowling Club, Fitzroy Park, Highgate, N6 6HT on Thursday 7 June 2018 between 18:30 and 21:30. The exhibition was publicised via letters to key stakeholders and local residents. Further details of publicity methods are detailed in the accompanying SCI.
- 4.13 The exhibition provided information of the proposal including:
- Planning and Site Context;
 - The Evolution of the Proposal (incl. design, massing, height and floor plans);
 - Indicative CGI's;
 - Timeframe for submission; and
 - Planning application process.
- 4.14 The exhibition was staffed throughout by members of the project team who were available to answer any questions posed.
- 4.15 The exhibition was attended by approximately 30 people who were able to provide written feedback using forms available or by email or post.
- 4.16 The consultation provided residents, Councillors, local businesses and organisations with the opportunity to comment on the scheme and engage with the Applicant regarding the redevelopment. A total of 7 written comments were received, the feedback of which is analysed in the accompanying SCI. However, in summary, it is noted that the results demonstrate that there is broad support for the scheme.

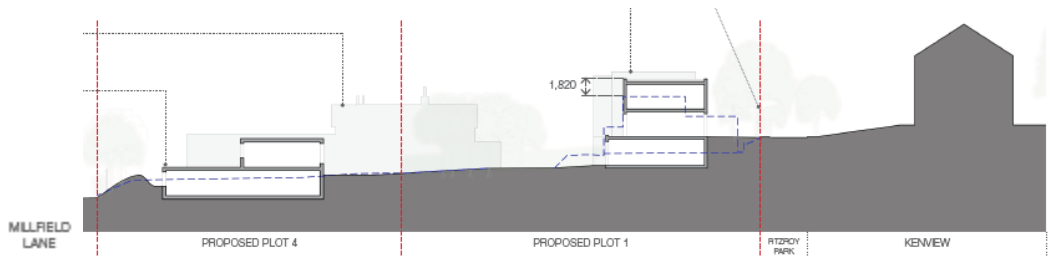
- 4.17 Overall, extensive consultation has taken place during pre-application discussions providing the opportunity for stakeholders to take part in the planning and design process. It provided the opportunity to feedback and inform the proposal's development, as well as directly influence the design of the proposals.
- 4.18 In particular, the Design Review Panels were fundamental in changing the design of the scheme and the public consultation exercise demonstrated the flexibility of the applicant and architects to react to the feedback from the consultation. However, this would not have been possible without the extensive involvement from local stakeholders who contributed their ideas towards the overall design of the scheme.
- 4.19 The key findings of the stakeholder workshops, and all other public consultation exercises, are provided in the accompanying Statement of Community Involvement (SCI).

5. THE PROPOSED DEVELOPMENT

- 5.1 Full planning permission is sought for the demolition of all existing buildings on the site and their replacement with five detached homes. In order to respond to local context, the development has been laid out to accommodate a low plot ratio, all within the lower range of surrounding plots.

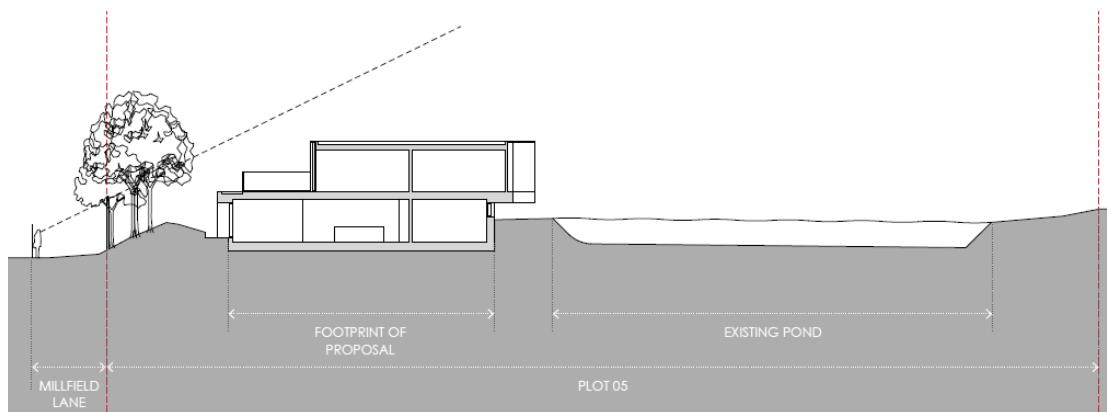


- 5.2 Plots 1-3, located on the frontage of Fitzroy Park, have been significantly redesigned since their inception, with an emphasis on creating a family of contemporary dwellings, largely reflective of other redevelopment proposals in the locality. The group of homes have been designed with appropriate gaps of 5 metres between each unit with greater widths at the book ends in order to create a perception of spaciousness, emphasised further by limited massing which ensures the hierarchy of landscape over built development is maintained.
- 5.3 Plots 4 and 5 are proposed at the rear of the site adjacent to Millfield Lane and are similarly contemporary in form, designed on a bespoke basis.
- 5.4 Plot 4, in the southern part of the development site, will be sunk into the ground with a curved feature, most prominent from the entrance to the site. This 'ground hugging' form of development respects the context of the open space, similarly maintaining the hierarchy of landscaping to built development. A private pedestrian route will be provided from Fitzroy Park to access these developments.



Plots 1 & 4 – Diagrammatic sections

- 5.5 Plot 5, in the north-western part of the rear garden has been redesigned since its inception in light of pre-application consultation. The home will be sunk into the ground as per plot 4 in order to maintain a degree of consistency and ensure the perception of open space from the public domain is maintained. Its primary elevation will address the pond and its first floor will benefit from a gentle curve to reflect the form of the pond and the surrounding landscape.
- 5.6 The curved design elements of plots 4 and 5 create subtle differentiation between the frontage plots, creating individual character, corresponding to the site context. Each home would be provided with a green roof to provide valuable meadow grassland and PV panels to address matters of sustainable construction.



Plot 5 – Diagrammatic section

- 5.7 The plot ratios are between 10.9% and 18.5% (10.9/16.5/16.7/17.1/18.5) which is within the lower quartile when compared with adjoining sites also within the same private open space designation. Each building could fit comfortably on the plot, retaining significant areas of garden/private open space. The plot ratios are all within the lowest 9 of the 21 plots in the immediate surroundings and a full breakdown is provided in the Design and Access Statement that accompanies the application.



Plots 1, 2 and 3 from Fitzroy Park

5.8 The proposed development will be facilitated by the construction of a new access drive from Fitzroy Park which will form the main construction access route as well as the entrance drive in the long terms for plots 4 and 5. At its connection to Fitzroy Park, the access way will be provided with a width of 4.5 metres and this is sufficient for two cars to pass. At the point of access to Plots 4 and 5 the access will be a pathway 2 metres wide. The driveway's bellmouth access with Fitzroy Park is located to avoid impact on the root structure of adjacent trees. The slope of the site will mean that a retaining structure is required to support the driveway and each development plot will be provided with a single car parking space. All vehicles will be able to turn so that they enter and exit the development in a forward gear.



Rear interpretation of plots 1,2 and 3



Front interpretation of plot 4



Rear interpretation of plot 4



Front interpretation of plot 5



Rear interpretation of plot 5

6. PLANNING HISTORY

Application Site

- 6.1 The application site has been the subject of various applications relating to tree works. However, there is no planning history relevant to the determination of this application.

Surroundings

- 6.2 The planning history relating to surrounding plots is a material consideration in the determination of this application. Specifically, a number of permissions exist for the redevelopment of sites for residential purposes.

Site at 53 Fitzroy Park

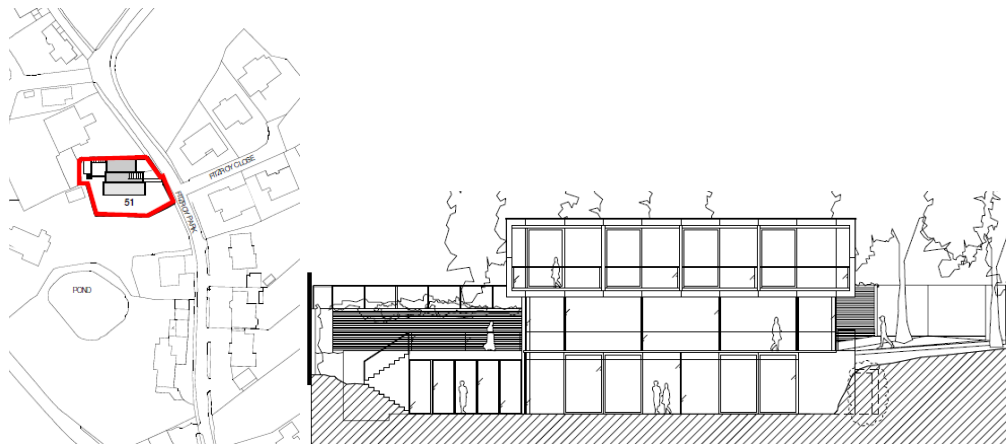
- 6.3 No.53 Fitzroy Park bounds the application site to the north. Full planning permission **(2011/1682/P)** was granted on 13 April 2011 for the redevelopment of the site to provide a three-storey home following the demolition of an existing dwelling **(2011/1686/C)**. That permission was not implemented and has since expired. On 04 July 2016 full planning permission **(2015/0441/P)** was granted for the erection of a three-storey home following the demolition **(2015/2197/P)** of the existing buildings on site. The permission remains extant and provides for a plot ratio of 19.9%, considerably higher than any of the plots the subject of the current planning application.



Extracts from planning application submission 2015/0441/P

- 6.4 In considering that application, the case officer noted in relation to demolition that; *whilst the design of the existing house is not architecturally noteworthy in itself, it forms a part of this unique group. However, as the building is not considered to be a positive contributor, the principle of demolition is not contested provided that the replacement scheme preserves or enhances the conservation area.*
- 6.5 In considering the impact on the wider setting the case officer highlights the importance of public views in stating; *the built development below the boundary wall cannot be seen and has limited impact on the openness and verdant character of the area. The scale and dense nature of trees on Hampstead Heath and around the ponds significantly screens the existing building; this would also continue to be the case with the proposed building....As a result, the existing, extant and proposed building, even with its increase in height and bulk, would not be visible. In this respect, the proposal*

- 6.9 No.51 Fitzroy Park is located to the north of the application site and comprises a small plot fronting the lane. Full planning permission **(2009/1579/P)** was granted on 21 December 2009 for the erection of a two-storey home following the demolition **(2009/1581/C)** of an existing dwelling. The permission was amended under application references **2011/0097/P** and **2011/4153/P** on 10 March 2011 and 12 October 2011 respectively.



Extracts from planning application submission 2011/4153/P

- 6.10 The permission identifies a contemporary form of development as being appropriate in the context of the Fitzroy Park setting and allowed for a plot ratio of 42.9%, considerably in excess of the proposed plot ratios the subject of the current application.

The Water House

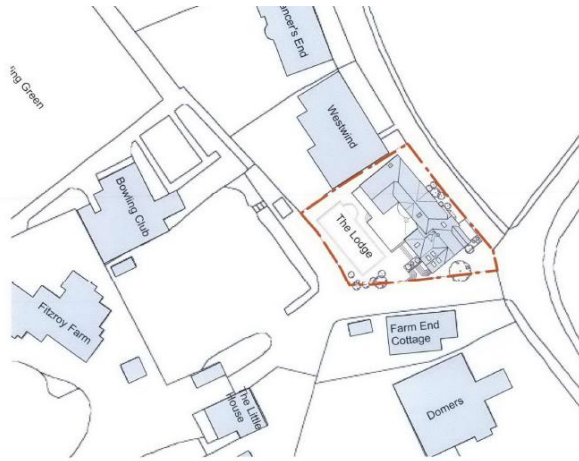
- 6.11 The Water House bounds the majority of the northern boundary of the application site and takes its main access from Millfield Lane to the west. On 22 August 2011 full planning permission was refused **(2011/4390/P)** for the erection of a two-storey home following the demolition **(2011/4392/C)** of an existing dwelling. Importantly, the application was refused on the grounds that 1. The intensive use of Millfield Lane for construction traffic would harm tree routes and adversely affect users of the lane; 2. The general impact on veteran trees; and 3. The lack of a s106 legal agreement to secure a basement construction plan, car-capped housing and necessary highway works for Millfield Lane. The application was not refused as a matter of principle or on design/general impact grounds.
- 6.12 On 13 April 2018 full planning permission **(2017/3692/P)** was granted for several extensions and an outbuilding. In granting permission, the concerns that led to the refusal of planning permission referred in paragraph 6.11 were considered to be addressed.

The Lodge

- 6.13 The Lodge is located to the north of the application site, east of Fitzroy farm, and fronts Fitzroy Park. On 7 November 2012 full planning permission was granted

(2012/1638/P) for the erection of a three-storey home following the demolition of the existing dwelling **(2012/1640/C)**.

- 6.14 In considering the application the case officer highlighted that the existing dwelling was identified as a positive contributor to the character of the Highgate Conservation Area but applied planning judgement by concluding that its loss was not detrimental, largely a result of the quality and scope of the redevelopment proposals.



Extracts from planning application submission 2012/1638/P

7. PLANNING POLICY CONTEXT

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

LEGISLATION

Planning (Listed buildings and Conservation Areas) Act 1990

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

Planning and Compulsory Purchase Act 2004

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

NATIONAL PLANNING POLICY

National Planning Policy Framework (2018)

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

- 7.7 The NPPF introduces three dimensions to ‘Sustainable development’ (Economic, Environmental & Social - para 8), and advises that they are mutually dependent and should not be undertaken in isolation.
- 7.8 In applying this approach, firstly, development must be considered to be sustainable taking into account all three of the dimensions of sustainable development; a development that is sustainable in only one dimension would not be considered sustainable for the purposes of the presumption. The applicant considers that the development meets all three threads of sustainable development (see section 8).
- 7.9 Secondly, the decision-taker is required to consider whether the development accords with an up-to-date development plan – and if it does planning permission should be granted unless material considerations indicate otherwise. The applicant considers that the development accords with the development plan (see section 8).
- 7.10 Thirdly, the decision-taker is required to determine whether there are any relevant development plan policies, or the policies which are most important for determining the application, are out-of-date and if not, grant permission unless:
- the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 7.11 Section 5 refers to housing. With regard to delivering a wide choice of high quality homes, paragraph 59 re-iterates the governments objective of significantly boosting the supply of homes and states the importance of a sufficient amount and variety of land can come forward where it is needed and that land with permission is developed without delay.
- 7.12 Section 9 refers to transport and states at paragraph 104 that planning policies should support an appropriate mix of uses across an area in order to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. In this instance, the application site is located within a residential area with good links to alternative facilities. It is therefore an inherently sustainable location.
- 7.13 Section 11 refers to the effective use of land and states at paragraph 117 that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It states further at 118(c) that policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
- 7.14 Section 12 refers to well designed places. Paragraph 127(c) states that *planning policies and decisions should ensure that developments are sympathetic to local*

character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

- 7.15 paragraph 127(f) states that *planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*
- 7.16 Paragraph 128 states that *design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.*
- 7.17 Paragraph 130 states that *where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*
- 7.17 Section 15 refers to the natural environment and states that the planning system should contribute to and enhance the natural environment by protecting and enhancing valued landscapes and should minimise the impact on biodiversity.
- 7.18 Section 16 refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset (paras 193-197). If the development would lead to less than substantial harm (the applicants position) then the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

National Planning Practice Guidance

- 7.19 The National Planning Practice Guidance (NPPG) was launched in March 2012 as a web-based resource to bring together planning practice guidance for England in an accessible and usable way.
- 7.20 The NPPG sets out guidance on a wide range of topics including, but not limited to, the historic environment; design; the determination of applications; flood risk; health and well-being; housing; the natural environment; open space and local green space; planning obligations; transport; and planning conditions.
- 7.21 To conclude, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is located on an inherently sustainable site making the best use of land available. It is therefore, subject to the detailed consideration in section 8 of this statement and all other supporting documents, wholly in keeping with the concept of sustainable development detailed within the NPPF.

LOCAL PLANNING POLICY

7.22 For the purposes of this application, the adopted Development Plan for the London Borough of Camden comprises the London Plan (2016), the Local Plan (2017), the Highgate Neighbourhood Plan (2017) and the Camden Planning Guidance Documents.

London Plan 2016

7.23 The London Plan (2016) is the spatial development strategy for London. It recognises the pressing need for more homes in London in order to promote opportunity under policy 3.3 and identifies a need to take into account local context and character in optimising housing output.

7.24 The Plan, under policy 7.8, requires development to identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

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

- Policy 5.12: Flood Risk Management
- Policy 6.9: Cycling
- Policy 6.10: Walking
- Policy 6.13: Parking
- Policy 7.1: Lifetime Neighbourhoods
- Policy 7.2: An Inclusive Environment
- Policy 7.3: Designing Out Crime
- Policy 7.4: Local Character
- Policy 7.6: Architecture
- Policy 7.17: Metropolitan Open Land
- Policy 7.18: Open Space
- Policy 7.19: Biodiversity
- Policy 7.20: Geological Conservation
- Policy 7.21: Trees and Woodlands

Emerging London Plan

7.26 While the 2016 London Plan is still the adopted Development Plan and carries full weight, the Draft London Plan is nevertheless a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption. Public consultation on the Plan took place from 1st December 2017 to 2nd March 2018 and The Mayor is currently considering the responses to the consultation.

- 7.27 In general terms, the constraints and rigid density guidelines set out in the existing London Plan have been removed in order to boost the number of new and affordable homes given planning permission.
- 7.28 The Plan emphasises the need to develop sites at a higher density, particularly on sites near to town centres or good public transport, reducing the need for car parking spaces within developments.
- 7.29 The new Plan also emphasises the importance of good design and will be applicable to buildings of all types. This approach is supported by a stronger policy on housing standards, including minimum space standards, which sets out how a home should be designed. The Plan also includes the Mayor's key strategic housing commitment for 50% of all new homes built to be affordable – achieved through planning, investment and building on public land.

Camden Local Plan 2017

- 7.30 The Camden Local Plan sets out the Council's planning policies and covers the period from 2016-2031.
- 7.31 Policy H1 seeks to maximise the borough's housing supply by exceeding the target for additional housing and Policy H4 seeks to maximise the supply of affordable housing, expecting a contribution to affordable housing from all developments of one or more additional homes. Crucially, the policy allows for developments with a capacity for fewer than ten additional dwellings, the Council will accept a payment-in-lieu of affordable housing.
- 7.32 Policy A1 aims to manage the impact of development in terms of residential amenity; transport impact and general community impacts. This covers a wide range of matters including visual privacy and outlook; sunlight, daylight and overshadowing; noise and vibration levels, odour impact, contaminated land etc.
- 7.33 Policy A2 states that the Council will protect all designated public and private open spaces unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area; resist development which would be detrimental to the setting of designated open spaces; conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas or to the setting of heritage assets; and give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL)
- 7.34 Policy A3 refers to biodiversity and states that the Council will protect and enhance sites of nature conservation and biodiversity and resist the loss of trees and vegetation.
- 7.35 Policy A5 states that the Council will only permit basement development where it is demonstrated that the proposal would not cause harm to neighbouring properties; the structural, ground, or water conditions of the area; the character and amenity of the area; and the significance of heritage assets.

- 7.36 Policy D1 seeks to ensure high quality design in all development and requires development to respect local character and the historic environment amongst a number of other criteria.
- 7.37 Policy D2 refers to heritage and states that the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings, including conservation areas. It states further that the Council will not permit development that results in harm that is less than substantial (the applicant position) to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.
- 7.38 Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.39 Policy CC3 states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 7.40 Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 7.41 Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

Camden Planning Guidance Documents

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

CPG Housing
CPG 2 Housing
CPG Amenity
CPG Biodiversity
CPG Planning for Health and Wellbeing
CPG Public Open Space
CPG1 Design
CPG3 Sustainability
CPG6 Amenity
CPG7 Transport
CPG8 Planning Obligations

NEIGHBOURHOOD PLANNING

- 7.43 Once a Neighbourhood Plan has been agreed at a referendum and is made (brought into legal force) by the local planning authority, it becomes part of the local planning authority's development plan as an official development plan document which carries

statutory weight. If a policy contained in the development plan for an area conflicts with another policy in a development plan, the conflict must be resolved by the decision maker in favour of the policy which is contained in the latest document to become part of the development plan.

Highgate Neighbourhood Plan 2017

- 7.44 The Council formally adopted the Highgate Neighbourhood Plan on 11 September 2017. The Plan is part of the statutory 'development plan' for the area and therefore should be used alongside the Council's own adopted planning documents when making decisions on planning applications in the neighbourhood area. The policies of the Neighbourhood Plan are largely in conformity with the Local Plan. Specifically;
- 7.45 Policy SC1 aims to facilitate the delivery of Highgate's housing needs by encouraging the provision of affordable housing and optimising the use of land.
- 7.46 Policy TR1 requires new development to promote walking, cycling and public transport use and Policy TR3 aims to minimise the impact of traffic arising from new development.
- 7.47 Policy TR4 states that development will be expected to be car-free in areas that are designated as a Controlled Parking Zone. In the few streets that are not in a CPZ, development will be expected to be car-free if there is good access to public transport
- 7.48 The Neighbourhood Plan identifies Hampstead Heath as an area of major public open space where policy OS1 requires any development to respect its setting and not be visually intrusive. It states further that development should not harm protected views and not be detrimental to the integrity, appearance or setting of the open space in terms of height, scale, massing, use of materials or function.
- 7.49 Policy OS2 aims to protect trees and mature vegetation and states that development will be expected to preserve or enhance the character of Highgate's conservation areas, and the setting of the major open spaces.
- 7.50 Policy DH2 refers to development in conservation areas and states that development should preserve or enhance the character or appearance of Highgate's conservation areas and respect the setting of its listed buildings and other heritage assets.
- 7.51 Policy DH8 states that all proposals for new buildings will be required to ensure that waste facilities are well designed and sensitively integrated into developments and that refuse storage points must be appropriately located so they will not impact upon the amenity of neighbouring properties.
- 7.52 Policy DH10 refers to garden land and backland development and states that there will be a presumption against the loss of garden land in line with higher level policies. In that regard it is noted that the proposed development will not result in the blanket loss of garden land.

8. PLANNING ASSESSMENT

8.1 PRINCIPLE OF DEVELOPMENT

8.1.1 Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In terms of the principle of development, the site designation and its use must first be considered. The site is in active residential use as a single home and its associated amenity space. The site is nevertheless designated as 'private open space' by the Local Plan and is located immediately adjacent to Hampstead Heath which is defined as Metropolitan Open Land. Each of these designations are afforded their own protection and therefore, in order to establish the principle of the re-development of the site, consideration is required as to the demolition of existing built development; the loss of private open space and the impact on the Metropolitan Open Land. Detailed consideration of specific impacts are discussed in the latter parts of this statement.

Principle of Demolition

8.1.2 Firstly, it is noted that there are no development plan policies that restrict the demolition of buildings that are not protected by a particular designation. The existing building is not identified in the Highgate Conservation Area Statement as a building which makes a positive contribution to the conservation area however; it also sits prominently close to the highway in views and is built of low quality and now degraded materials. Its visual appearance is utilitarian and unattractive and it therefore offers little to the character and appearance of the area.

8.1.3 While the buildings in this part of Fitzroy Park are architecturally varied, and a great contribution is made by the many architect-designed mid-20th Century houses which form a significant part of the character of the area, this property is unremarkable in its design, has little architectural merit and no historic value. In isolation, the host property is not statutorily designated.

8.1.4 The Council have held on several occasions that the demolition of buildings is not unacceptable in this area. This is set out in more detail in Section 6 of this statement.

8.1.5 In light of these comments, and of course subject to the detailed consideration of all other matters, the demolition of the existing home is acceptable in principle.

Open Space

8.1.6 The whole of the site is designated in the Local Plan as "open space". There is no public access to the site so the land is private not public open space and it is not designated as Metropolitan Open Land. The site, being on Fitzroy Park, is in close proximity to Hampstead Heath and backs onto Millfield Lane. The site lies within Highgate Conservation Area, although Fitzroy Park has a very different character from much of the wider Conservation Area.

8.1.7 The relevant policy, in terms of open space, is Policy A2 of the Local Plan which is simply headed “Open Space” and states that the Council will protect, enhance and improve access to Camden’s parks, open spaces and other green infrastructure. The policy is criteria based and the relevant criteria, in terms of protecting the open spaces are:

- a. *protect all designated public and private open spaces as show on the Policies Map and in the accompanying schedule unless equivalent or better provision of open space in terms of quality and quantity is provided within the local catchment area;*
- c. *resist development which would be detrimental to the setting of designated open spaces*
- f. *conserve and enhance the heritage value of designated open spaces and other elements of open space which make a significant contribution to the character and appearance of conservation areas;*

8.1.8 The interpretation of this policy is a consideration in the determination of this application and the applicant has therefore instructed Queens Counsel to advise on the correct analysis of the policy. The opinion is copied below:

8.1.9 *What is being proposed here is the demolition of all existing development on the site and a redevelopment of the site with five new houses (of exemplary design). Although there is one dwelling house being replaced with five, the overall site coverage is fairly constrained. The existing site occupation including hard standing areas is 953sqm, which includes both the house and a hard tennis court. The area of the existing house itself is 474sqm. The proposed site occupation of built developments will be 690sqm, so there is an overall decrease of the built or hard surfaced area on the site of 263sq m, but there will be an increase of the area covered by dwelling houses. In these circumstances the Council in pre-application discussions considers that there will be some loss of open space. NOTE – Given the evolution of the scheme the figures quoted in the above paragraph may not correspond with the latest proposals. However, that does not affect the content of the legal opinion.*

8.1.10 *In considering this proposal against the policy it is critical to understand the purpose and intention of the policy. The policy covers both public open space and private open space. In terms of their contribution to the built environment and local amenity the two serve very different functions. Much of policy A2 is plainly intended to be focused on Public Open Space (“POS”) because it has no relevance to private open space. This can be seen, for example with A2 (a) where the reference to “the local catchment” can only apply to public open space, as by definition local people have no access to private open space, and there is therefore no catchment area.*

8.1.11 *It seems to me clear that when consideration is being given under the policy to private open space, where the public have no access whether formal or informal, then the intention of the policy is to ensure the protection of the character of the area, and specifically the role that the private open space has in contributing to that character. This is largely if not wholly an issue of townscape and the nature of the area around the site.*

8.1.12 This approach is set out in the policy in A2(f), and in the supporting text at para 6.37;
PROTECTION OF OTHER UNDEVELOPED AREAS INCLUDING GARDENS

'6.37 Development within rear gardens and other undeveloped areas can have a significant impact upon the amenity and character of the area. Gardens help shape their local area, provide a setting for buildings, provide visual interest and may support natural habitats. Therefore they can be an important element in the character and identity of an area (its 'sense of place'). We will resist development that occupies an excessive part of the garden, and where there is a loss of garden space which contributes to the character of the townscape. Part of the established character of these spaces may also be defined through features such as railings and garden walls. We will seek the retention of these features where they make a positive contribution to townscape value.'

8.1.13 The point is also picked up in para 6.43 in respect of key open spaces in Camden;

'There are numerous large private gardens adjacent to the Heath that are designated as open space. We will continue using guidance in conservation area appraisals and management strategies to preserve and enhance the built environment around the Heath and preserve outlooks and views from it.'

8.1.14 Therefore in assessing the acceptability under the policy of a proposal such as the present, the issue is its impact on the townscape, and here on the Conservation Area.

8.1.15 There is no policy that requires any new buildings to be on the same footprint as the original buildings or to be of the same volume. In terms of the setting of the open space this is necessarily going to be a very similar test to that for the impact on the Conservation Area, and in practice will involve considering how the proposed development relates to the immediate area, and whether the development is appropriate in relation to the open space that is retained and to the wider character.

8.1.16 The critical issue in terms of the impact on the character of the area at this particular location is the low-density nature of the development in Fitzroy Park, and in this part of the Highgate Conservation Area, and the heavily planted nature of the local environment. This can be most simply and effectively shown by an analysis of the plot ratios in the area as well as consideration of landscape proposals.

8.1.17 In terms of the impact on the Private Open Space and the wider setting or character of the area, those instructing me have undertaken a detailed assessment of the relevant plot ratios. The existing plot ratio of the structures on the site is 7.9% and this will under the proposals rise to as an average across the five plots 13.6% (NOTE – NOW 15.94%). It can be seen from the schedule in the Pre-Application response that the average plot ratio on Fitzroy Park is considerably higher than this and there are a number of properties where the ratio is over 30%. The proposed plot ratios therefore are wholly in keeping with the local character. There is thus no basis for finding that the quantum of built development being proposed on the site in terms of footprint, is unacceptable or out of keeping with the local character. As such there is no basis for

arguing that the loss of private open space here has any detrimental impact or is contrary to the policy A2.

8.1.18 That conclusion based simply on plot ratio is also supported by the proposed landscape scheme and the wider environmental consideration of the scheme. All the proposed properties are well set back from the road and will have significant landscaping, including tree planting along the frontage to Fitzroy Park. Within the site many trees will be retained and new ones planted. The important boundary along Millfield Lane will be wholly preserved, with only the existing emergency access onto the Lane. All the properties will have living roofs, which although obviously not open space provide an important ecological benefit, as well as serving to preserve and enhance the very “green” environment of Fitzroy Park. The scheme therefore has a significant ecological uplift, thus meeting the desire for environmental enhancement within the policy.

8.1.19 It is worth emphasising that the site does not fall within Metropolitan Open Land (MOL) in A2(g), and therefore the MOL policy test, which is effectively the same as the Green Belt test, does not apply. Equally this site, unlike some in the wider area, does not contain any listed buildings and does not impact on the setting of any listed buildings. The building currently on the site has no architectural merit and does not make a positive contribution to the Conservation Area. The heritage/ conservation issues that are relevant to the impact on private open space are therefore very different from that which may arise on other sites in the wider area. It seems to me that the circumstances of the application and this particular plot mean that a decision to grant permission will not set a difficult precedent in respect of other plots in the vicinity.

8.1.20 There have been a number of development proposals in the immediate vicinity of the site. Redevelopments at numbers 51 and 53 Fitzroy Park have been approved by the Council in very recent years. An application at the Water House, just behind the site, was refused in 2016 on the grounds of construction impact, but the principle and size of the development was considered acceptable. The permission on 53 Fitzroy Park, which adjoins the site involved a very considerable increase in the built volume on site and an increase in the plot ratio to 20%. The existing ratio was 9% and there was an extant permission which raised this to 19%. The officer’s report at 6.23 expressly said;

‘This is considered to be consistent with other similar plot ratios in the enclave of dwellings which form part of Fitzroy Park where they range from 10% (Kenview) up to approximately 32% (51 Fitzroy Park - Granted in 2009). With specific reference to private open land sites along Fitzroy Park, these include No.55 (8%), Farm End Cottage (26%) and the adjacent new build of No.51 (32%). In this regard the footprint of the dwelling is not considered excessive in terms of houses in the immediate area and those designated as private open space.’

8.1.21 A similar analysis was applied in respect of The Water House, the site which adjoins 55, but to the rear on Millfield Lane. A planning application was made for a new two storey dwelling, which was considered by Committee in 2016. The application was refused on the grounds of the construction arrangements, but the principle of the form

of the development was supported in the officer's report. It is recorded at paragraph 6.23 of the report that there was a doubling of the footprint and there was an increase in plot ratio from 15 to 29%. The report analysed the plot ratio in the immediate vicinity within the Private Open Space, which is effectively the same vicinity as 55 Fitzroy Park, as being 18%. The report found that the site coverage was not excessive and there was no harm to the Open Space.

8.1.22 *I can see no rational basis for the Council to reach any different conclusion in terms of increased plot ratio and impact on Open Space in relation to 55 Fitzroy Park. Although the Local Plan policy A2, is itself new, the policy test has remained precisely the same. The Council will, of course have to consider the detailed design and landscaping in order to satisfy the Conservation Area test, but in terms of amount of built development and plot ratio within Fitzroy Park, I can see no reason to differ from the Council's view on the adjoining two sites.*

8.1.23 *For all these reasons I think that the proposal falls within policy A2, when properly understood. There is no public open space on the site and the proposal entirely preserves, indeed enhances in many respects, the townscape and character of the area.*

8.1.24 *The Mayor of London has very recently published the new draft London Plan which is currently out for consultation. Obviously it is not yet adopted policy, but it is likely to carry material weight even as a consultation draft. That Plan includes policy H2 which supports the increased provision of housing on small sites, which is defined as applications for between 1-25 houses. This policy is highly relevant here as it expressly envisages sites such as this being an important source of future housing in London. It is clear that this proposal fits well into the terms of H2 as it is very carefully designed to fit in with the character of the Conservation Area (para 4.2.7); is designed to minimise impact on neighbouring properties (4.2.8) and enhances ecological benefits (4.2.9). Therefore H2 in the emerging London Plan is strongly supportive of this proposal.*

8.1.25 In light of the above QC opinion it is clear that the proposed development takes the appropriate cues from the site context and that of the surroundings. The private open space will be more exposed, allowing views of the large pond and attractive, retained landscaping, to the overall benefit of the wider the area. In addition, the major uplift in ecological value (discussed further at section 8.5 and within the Ecological Appraisal submitted in support of the application) supports compliance with Policy A2 of the Local Plan.

Metropolitan Open Land

8.1.26 Criteria g of Policy A2 states that the Council will give strong protection to maintaining the openness and character of Metropolitan Open Land (MOL).

8.1.27 The site is adjacent to the Heath which is both Open Space and MOL. The appearance of the proposed development in views from Hampstead Heath has been assessed in

detail as part of the development of the final scheme. Images have been created to test the effect of proposed massing and the extent to which the proposed development will appear in key views. The visualisations demonstrate that the proposed development will not be visible in longer views from the Conservation Area or the Heath due to the secluded nature of the site. In views from Hampstead Heath, both the existing and proposed houses are screened by existing trees during summer and winter months so the development will not be visible. Consequently, the proposed development will not harm the open character and setting of the adjacent Heath open space and will preserve the openness of the MOL.



Verified view from Hampstead Heath

Housing Supply

- 8.1.28 Matters pertaining to open space designations have been considered above but housing development is largely compatible with existing land uses in the surrounding area, which are mainly residential. In addition, the site is previously developed land.
- 8.1.29 In order to accommodate Camden's growing population, the Local Plan makes clear that the Council needs to make the best use of the borough's limited land and resources and promotes the most efficient use of land in the borough.
- 8.1.30 The application site is located in close proximity to transport links and a number and range of local services and opportunities. The site is therefore inherently sustainable and its redevelopment would accord with the principles of the new NPPF which outlines a presumption in favour of sustainable development; guidance which is echoed in the development plan.
- 8.1.31 In addition, Policy H2 of the New London Plan, states that "*small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites*". Small sites relate to the creation of 1-25 residential units, and part (e) of the policy provides for a 'presumption in favour of small housing developments'. The proposed development would accord with the principles

and the intent of this policy and therefore, in light of the above comments, and subject to the consideration of all other matters, the proposed development is considered to be strategically acceptable in principle.

8.2 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

- 8.2.1 Section 12 of the NPPF refers to well designed places. Paragraph 127(c) states that *planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.* Further, paragraph 130 states that *where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*
- 8.2.2 Policy D1 of the local plan provides further detail on local requirements and, importantly, states that the council will require that development respects local character and context, guidance that is consolidated by Camden Planning Guidance 1 on Design.
- 8.2.3 The proposed development does not depart from the lawful residential use of the site and the main issue relating to impact would therefore be limited to density, design, layout and appearance.
- 8.2.4 In terms of density, this is best read through the plot ratio assessment which identifies a reasonably dense form of development throughout the immediate and wider surroundings. The proposed development creates plot ratios largely below those of the surrounding development and is therefore appropriate in this context.
- 8.2.5 Beyond that, in terms of understanding impact, it is first important to understand the site context. The site comprises a single domestic property built in the 1950s. The dwelling is of no architectural or historic merit and does not contribute positively to the character and appearance of the area.
- 8.2.6 Whilst there are 5 plots in total, for design purposes plots 1-3 have been grouped as a 'family of objects' due to their proximity to each other, and their relationship with the Fitzroy Park street elevation. They are arranged along the site boundary with Fitzroy Park, and loosely fit within the footprint of the existing building. There is a minimum 5m spacing between each building, to allow increased visual and ecological connectivity through the site from Fitzroy Park.
- 8.2.7 The building footprints have been positioned to be set back from Fitzroy park, with new hedgerows and tree-lines, to minimise their impact on the streetscape. Building heights have also been minimised to keep in line with the neighbouring properties to the north and south.
- 8.2.8 In terms of design, the proposed architecture is contemporary in appearance, inspired by the numerous fine modernist homes nearby on Fitzroy Park, and elsewhere in Highgate. Brick has been chosen as the predominant material for all five buildings, to

give a common architectural palette to the development as a whole, and to relate to the rich heritage of brick buildings in the local area.

- 8.2.9 Plot 4 is located towards the rear of the site and is laid out to accommodate an obvious curve to respond to both the site entrance and the adjacent pond. This dwelling, while not visible over the wider surroundings, creates a unique and high-quality form of built development, responding to the site characteristics and surroundings.
- 8.2.10 Plot 5 is positioned towards the rear of the site, with the footprint for the proposed building loosely located within the confines of the existing hard-standing tennis court. The location of the plot ensures it has minimal visibility from Fitzroy Park. However, the views from Millfield Lane and, especially, Hampstead Heath are sensitive, so have been considered when developing the form.
- 8.2.11 Steps have been taken to minimise any impact on the existing pond. These include shifting the building and retaining wall as far as practical from the pond and minimising the potential for light spill from the proposed building.
- 8.2.12 The final proposal for Plot 5 is an elegant, contemporary brick building that both respects and responds to its context. From the north, it appears as a simple single-storey pavilion set back from the existing pond, responding to the pond's form. The view from the South reveals a two-storey building that is set into the stepped landscape and a restrained palette of materials is utilised to compliment the simple sculptural form.
- 8.2.13 To conclude on matters of character, the proposed development is considered to sympathetically adjoin neighbouring development, would not be overly prominent in the wider surroundings and is of exemplary design to complement existing levels of built development. The proposed development is therefore considered to accord with the principles of the development plan and national planning policy guidance in this regard.

8.3 HERITAGE IMPACT

- 8.3.1 Case law dictates that decision makers are required to give *great weight* to any harm to the significance of a heritage asset and how this should be applied is set out under section 16 of the NPPF. This refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of the heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset. If the application would cause *substantial* harm, paragraph 195 sets out that consent should be refused unless it can be demonstrated that the substantial harm or loss is *necessary* to achieve substantial public benefits that outweigh that harm. If the application would cause *less than substantial* harm paragraph 196 requires that the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Paragraph 197 requires that in weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- 8.3.2 The Council's Conservation Area Statement (CAS) for Highgate recognises that the character of the Fitzroy Park is derived from the close relationship between the topography, the soft landscape and the groups or individual houses built within it. There is an overriding impression of heavy foliage and mature trees as well as the sense of open space denoted by the Heath at the bottom of the hill. There is also a sense of seclusion as the road is private and is gated at its northern end.
- 8.3.3 The CAS elaborates in stating that Fitzroy Park still retains its original atmosphere of houses set in large gardens with many mature trees and boundaries in keeping with the rustic character of the lane. Fitzroy Park itself is an important green pedestrian approach to the Metropolitan Open Land of Hampstead Heath, and this quality is enhanced by its informal, unmade style, which give it a rustic appearance rare in the London suburbs. The character, form and significance of the conservation area are not questioned by the applicant.
- 8.3.4 A number of alterations to dwellings in the immediate locality, many including complete demolition and rebuild, have been allowed by the LPA (as set out in section 6 of this statement). Those developments largely provide for a contemporary style of architecture, in stark contrast to the more traditional form of development to be found when the conservation area was designated. That contrast of architecture now forms an important part of the character of the area and is a sympathetic response to the green and rustic appearance of the lane.
- 8.3.5 No. 55 Fitzroy Park is an unremarkable building of no notable architectural quality, that makes at best a neutral contribution to the significance of the Highgate Conservation Area. The Proposed Development offers 5 new houses of an architecture of a high quality, designed by two architectural practices, which hold out the promise of becoming valued additions to the rich history of 20th century and later homes in the area.
- 8.3.6 The landscape of the Site as found today, including historic elements which predate the current house on site, have informed the scheme. These include the planted site boundaries and the pond.
- 8.3.7 In respect of the design considered in its own right, and the relationship between the proposed development and its surroundings, the effect will be entirely positive. The proposed development will enhance the quality of the townscape of the area and the character and appearance and significance of the Highgate Conservation Area. There will be no effect on the setting of any listed buildings. In respect of design and built heritage considerations, it is in line with the policies and guidance on design set out in the NPPF and PPG; London Plan policies; local policies CS14, DP24 and DP25 and SPDs. Please refer to the Heritage Assessment that accompanies the application for a full assessment of heritage impact.

8.4 **LANDSCAPING**

- 8.4.1 In general terms, soft landscaping, whether or not there is public access to it, is important for its contribution to the quality of urban life by providing important green lungs, visual breaks and wildlife habitats in built-up areas. In site specific terms, soft landscaping is an integral part of the application site and wider surroundings. This is highlighted in the conservation area review which refers to an overriding impression of heavy foliage and mature trees as well as a sense of open space denoted by the Heath at the bottom of the hill. It is also important to note that there is a sense of seclusion as Fitzroy Park is private and is gated at its northern end. This level of importance is highlighted further by the location of the site adjacent to Metropolitan Open Land (MOL) and the designation of the site itself as Private Open Space.
- 8.4.2 As a result, there are various policies, both locally and nationally, that aim to protect and/or encourage the provision of important open spaces.
- 8.4.3 Policy 7.17 of the current London Plan supports the protection of MOL and requires consideration of the openness of the designation when determining planning applications and Policy A2 of the Local Plan seeks to protect private open spaces.
- 8.4.4 While designated as private open space, the application site comprises the extensive rear amenity area of 55 Fitzroy Park with no public access availability. Further, the area of undeveloped land is not readily visible in the public domain as referred above at section 8.2 and in any case, the proposed development does not propose the widespread loss of trees/vegetation in light of development being confined to the site itself.
- 8.4.5 The extent and type of built development proposed would respect the character of the site as referenced above at section 8.2 and in the accompanying Design and Access Statement and an extensive tree planting plan is proposed which is set out in the accompanying Arboricultural Impact Assessment. Specifically, 39 trees will need to be removed in order to construct the proposed development, this includes three B-grade trees, 31 C-grade trees and five trees in very poor condition (category U trees). The trees that will need to be removed are mostly small and set back from the road and so their loss will not have a significant impact on the character or appearance of the local area. The loss of these trees will be compensated by planting 82 new trees. These new trees will provide an age and species diversity that will enhance the resilience of the existing tree canopy cover, improving the appearance of the site considerably.
- 8.4.6 The quality and inconspicuous nature of the built development and the extent of planting proposals ensure that the development would not only preserve but enhance the private open space and this would be strengthened further by the exposure of open areas, a result of the proposed access onto Fitzroy Park; the replacement of concrete fencing with natural habitat fencing and the complete clean-up of the natural pond.
- 8.4.7 The accompanying arboricultural information provides a comprehensive methodology for the protection of the trees which will be retained. Appropriate Arboricultural conditions to secure tree protection can be attached to any permission granted where necessary.

8.5 ECOLOGY

- 8.5.1 A primary aim of the NPPF is to contribute to and enhance the natural and local environment and requires decision makers to not only conserve but enhance biodiversity. This is echoed in the development plan under policies 7.19 (London Plan), A3 (Local Plan), OS2 (Neighbourhood Plan) and the CPG on biodiversity.
- 8.5.2 In light of the above requirements an Ecological Appraisal supports the application and that has been supported by a desk study and ecological baseline surveys, including an Extended Phase 1 Habitat Survey, and a series of protected species surveys including for bats, great crested newt and reptiles.
- 8.5.3 The site currently comprises a residential building and associated hardstanding along the eastern boundary, with a disused hard-surface tennis court in the west, and a mosaic of habitats forming a private garden including scrub, trees, ornamental beds, a pond and a small orchard. The value of the garden for wildlife is likely to be reduced given disturbance associated with its use and management, including regular access by dogs. More valuable habitats within the site include a relatively undisturbed pond and associated marginal and scrub habitats, an area of orchard which would likely meet the definition as a Habitat of Principle Importance in England, and scrub and treed Site boundaries.
- 8.5.4 Where possible impacts on more sensitive habitats has been avoided, with the retention of the pond and boundary habitats. Mitigation has been incorporated from the outset through the early provision of ecological input to the design development, with a number of landscaping proposals incorporated including (but not restricted to) using native hedgerows to form plot boundaries, replanting of orchard habitats including flower-rich grassland habitats, reinforcement boundary planting, increasing vegetated habitats from 3596m² to 3961m².
- 8.5.5 In addition, a number of enhancement measures have been incorporated, including the enhancement of the pond's marginal habitats and integration of bat roosting features within the buildings (as well as bird nesting boxes). All of the above will serve the additional function of enhancing the wildlife corridor.
- 8.5.6 To conclude, the proposed development can be delivered whilst maintaining the value of the site for wildlife and the proposed development would therefore accord with both the NPPF and development plan policies A3, OS2, 7.19 and the Camden CPG on Biodiversity. For full details of ecological impact and mitigation please refer to the ecological appraisal and species surveys.

8.6 ACCESS AND HIGHWAYS IMPACT

- 8.6.1 Policies T1 and T2 of the Local Plan highlight the importance of prioritising walking and cycling as a sustainable mode of transport and indicate that car-free development across the borough is a key aim. Notwithstanding that, the CPG on Transport offers greater flexibility in stating that car-free development will be expected in the Central London Area, town centres and other areas with high public transport accessibility.

- 8.6.2 The site is located approximately midway between Highgate and Archway stations, and the nearest bus stops are located on Highgate West Hill, to the west of the site. Additional bus services are available from Hampstead Lane, to the north of the site. Despite this, the site has a PTAL score of 1b, which indicates that it has a very low level of accessibility by public transport.
- 8.6.3 Fitzroy Park is a private road and is not part of the surrounding Controlled Parking Zone CA-U, which operates between 10am and 12 noon, Monday to Friday. Given the very poor PTAL rating and the fact that the site is a private road and outside of any controlled parking zone, it is considered that it would not be appropriate to require this development to be either car-free or car-capped. Indeed, the current London Plan allows a degree of flexibility in applying this approach and pre-application discussions with the Council have confirmed that the provision of one space per home would be appropriate in the context of this application.
- 8.6.4 There is ample room for the secure parking of cycles within the site to a level that would exceed the Council's standards. A condition can secure the provision of cycle parking on any permission granted.
- 8.6.5 One point of access is proposed to serve Plots 1, 4 and 5 from Fitzroy Park. Plots 2 and 3 would have separate driveways accessed from Fitzroy Park leading to individual driveways. In comparing the baseline trip generation of a single home on the site with the proposed development it can be concluded that only a negligible effect on the local highway network will accrue, largely as a result of the lite touch approach to parking provision.
- 8.6.6 In light of the above, the proposed level of parking proposed, and the impact on the wider highway network can be deemed compliant with the NPPF and the development plan. A detailed analysis of highway impact is set out in the Transport Statement that supports the application.

8.7 **HYDROLOGICAL AND GEOLOGICAL IMPACT**

- 8.7.1 Paragraph 6.110 of the Local Plan states that 'a basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development. Therefore, as all five proposed homes are to be set in part at lower level than the surrounding ground, they all require assessment for basement impact.
- 8.7.2 In light of the above, Geotechnical and Hydrological Assessments support the application. The content of the assessments equate to a basement impact assessment and are structured to determine any residual impact that might arise from the proposed development. The methodology used in assessing impact relies on technical guidance provided by the Council in November 2010 to assist developers which is known as the Camden Geological, Hydrogeological and Hydrological Study – Guidance for Subterranean Development (CGHHS).

8.7.3 Taking into account the proposed surface and groundwater drainage routing system to be utilised following construction and the relatively low depth of excavations to be performed in order to accommodate the basement developments, it is concluded that any residual and cumulative long-term impacts of the construction on the stability of the site will be negligible, therefore ensuring the proposed development complies with the development plan in this regard. For full details, please refer to the Hydrological & Hydrogeological Impact Assessment that support the application.

8.8 DRAINAGE AND FLOOD RISK

8.8.1 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. This guidance is echoed under Policy CC3 of the Local Plan which advises that development should not increase flood risk and should reduce the risk of flooding where possible.

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

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

8.9 ARCHAEOLOGICAL IMPACT

8.9.1 Paragraph 128 of the NPPF states:

'... Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'

8.9.2 This is echoed by the development plan which states that development proposals within designated architectural priority areas will be required to be supported with a desktop study of potential impacts on the archaeological asset.

8.9.3 In this instance the application site lies outside of the archaeological priority area as defined by Camden's development plan and there are no known sources of archaeology that would warrant a desktop study. The application is not therefore supported with an archaeological assessment, in accord with the guidance set out in the development plan.

8.10 IMPACT ON RESIDENTIAL AMENITY

- 8.10.1 Policy A1 of the Local Plan seeks to ensure that standards of amenity are protected. This requires the highest standards of design to ensure the amenities of existing and future occupiers are safeguarded and this is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.
- 8.10.2 In terms of existing homes that may be affected by the proposed development, these would be limited to the adjoining homes; The Water House and 53 Fitzroy Park to the north and Fitzroy Lodge to the south. However, those properties and their associated amenity areas would not suffer from either a loss of daylight/sunlight or from overlooking or overbearing impacts because they are physically removed from the extent of built development proposed and, in any case, would be screened by landscaping, to the extent that the proposed development would not be visible from the confines of those individual plots. To further protect the impact on adjoining occupiers, it is noted that the orientation of the proposed homes is such that no windows would directly overlook the adjoining plots. To consolidate this position, it is noted that a broad level of support for the scheme has been expressed by the occupiers of The Water House and Fitzroy Lodge.
- 8.10.3 In terms of the impact on the future occupiers of the proposed development, any impact would be contained to the site itself, i.e. the interrelationship between each of the proposed homes.
- 8.10.4 The frontage homes, comprising units 1, 2 and 3, have been provided with gaps of 5 metres between with the end two plots provided with gaps and 7 and 10.1 metres respectively to the adjoining plots outside of the application site. This level of separation is appropriate as a side to side relationship, particularly as no habitable windows would be located within the confines of those gaps.
- 8.10.5 Plots 4 and 5 at the rear of the site would be separated from the frontage units by a distance well in excess of 18 metres, a relationship considered acceptable by Camden's CPG on amenity.
- 8.10.6 The relationship of built development has been carefully considered in the context of the topography and distances between buildings and the absence of clear relationships with sensitive windows that could suffer substantive reductions in outlook means that there are unlikely to be any detrimental effects on the levels of sunlight/daylight that would warrant more detailed assessment.
- 8.10.7 In terms of noise and air quality, the accompanying Noise and Air Quality Assessments confirm that the development would not have a detrimental impact on the amenity of the neighbouring occupiers in accordance with Camden Planning Guidance. The development will be carried out in full accordance with these technical reports.
- 8.10.8 The proposed homes will provide generous garden and room sizes and will meet lifetime homes standards.

8.10.9 In order to ensure that residential amenity is not significantly impacted upon during construction a Construction Management Plan (CMP) supports the application. This is referred to at section 8.11 and is expected to be secured via a s106 legal agreement.

8.11 CONSTRUCTION MANAGEMENT

8.11.1 The narrow proportions of the lane and the sensitivities of the surroundings inevitably mean that construction activities could have significant impacts on the surrounding community, particularly in relation to impacts on roads, noise and air quality. While that should not restrict development per-se it is nevertheless a matter that must be addressed and a Construction Management Plan (CMP) has therefore been prepared which will ensure the impact of construction, both for construction on site and the transport arrangements for servicing will be minimised.

8.11.2 The CMP has been prepared in accordance with best practise and guidance notes set out in CPG6: Amenity and CPG8: Planning Obligations and Transport for London's (TfL's Standard for Construction Logistics and Community Safety (CLOCS) scheme) and Camden's Minimum Requirements for Building Construction (CMRBC).

8.11.3 It carefully sets out how operations are intended to be carried out and outlines a commitment to liaise with the local community, in particular the Fitzroy Park Residents Association, neighbouring properties and the North London Bowling Club. The CMP confirms the standard working hours will accord with Camden's expectations and sets out how any potential impacts will be mitigated and managed in accordance with the afore mentioned documents.

8.11.4 There will be no parking for any construction vehicles at any time and the 55 Fitzroy Park project management team will enforce this procedure ensuring that no site users, operatives, management, visitors or any others that may have cause to visit the site will park on the Fitzroy Park carriageway if they cannot gain access to the temporary loading area. This will be enforced by full-time traffic marshals that will man the site gates and approach to the site along Fitzroy Park.

8.11.5 All vehicles will be instructed to access the site from Highgate West Hill then turn into Merton Lane traveling to the end of the lane to be met by a Traffic marshal. Turning right into Fitzroy Park (Private Road) vehicles will drive along the road with a traffic marshal walking in front of the vehicle until they reach the site gates and there the vehicle will reverse off the road onto the existing drive or newly established loading platform. A pit lane will in any case be provided in order to ensure that construction vehicles are kept clear of Fitzroy Park at all times. Please refer to the CMP for full details.

8.11.4 It is acknowledged that a CMP is very much a working document which needs to be agreed, reviewed and updated on a regular basis with the relevant landowners of the Lane as the programme develops. Therefore, it is expected that this would be secured via a s106 legal agreement.

8.12 FINANCIAL CONTRIBUTIONS

Mayoral Community Infrastructure Levy (CIL)

8.12.1 The Mayor of London introduced a CIL to help fund Crossrail and the charging schedule was approved on 29 February 2012. Camden is identified in zone 1 of the schedule where there is a charge of £50 per sq.m. The proposed development results in an uplift of 919sq.m of floorspace that would be liable for the charge and that amount must be calculated in accordance with regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended).

8.12.2 Notwithstanding the above, plots 1-3 are being built for Mrs Turner-Stokes and her daughters and plots 4 and 5 for Mr Geoffrey and Ryan Springer respectively as their principal residences', and as such a self-build exemption will be applied for to provide relief against the Mayoral CIL Charges. This is indicated on the accompanying CIL Information Form.

Camden CIL

8.12.3 Camden introduced their CIL on 1 April 2015. The application site is located in zone C of the Council's charging schedule which specifies a CIL liability of £500 per sq.m for residential developments of ten homes or less. The liability is calculated in the same manner as the Mayoral CIL.

8.12.4 The same approach will be applied to self-build exemption and this is similarly indicated on the accompanying CIL Information Form.

Other obligations

8.12.5 Paragraph 204 of the NPPF states that planning obligations should only be sought where they meet all of the following CIL tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

8.12.6 The tests above are known as the "CIL Tests" after the Community Infrastructure Levy Regulations which made them statutory requirements.

Affordable Housing

8.12.7 Policy H4 of the Local Plan states that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The Council will seek to maximise a reasonable amount of affordable housing based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home.

8.12.8 The policy is explicit in stating, under criterion g, that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. The policy is also clear that the requirement is calculated entirely in relation to the additional floorspace.

8.12.9 Camden's Interim Housing CPG of March 2018 provides additional detail on calculating affordable housing capacity and targets and overall liability but does not change either the formula or the requirement as set out under local plan policy H4.

8.12.10 The proposed development comprises a total GIA of 1344sqm (1548 GEA). However, the existing home on the application site is 425sqm (498 GEA), meaning that the uplift of floorspace, for the purposes of affordable housing calculations, is 919sqm (1050 GEA).

8.12.11 To calculate liability the following is required:

Capacity – An additional residential floorspace of 100 sq m GIA is generally considered to create capacity for one additional home. Therefore, additional floor space of 919sqm creates a capacity for 9 additional homes (919/100 rounded to the nearest whole number)

Target - The capacity and a sliding scale is used to determine the affordable housing percentage target. The sliding scale is a simple straight-line scale starting with a 2% affordable housing target for a development that has capacity for one additional home. For every further home added to the capacity of the site, 2% is added to the affordable housing target. Therefore, for the application site with a capacity of 9, the affordable housing percentage target is 18% (9 x 2%)

Target in GIA – The target in GIA is simply the target (18%) of the total GIA (919). Therefore, for the purposes of this application the target in GIA is 165.42sqm (18% of 919sqm) (189 GEA).

8.12.15 As the capacity is under 10 payment in lieu is the accepted method of delivery. The applicant acknowledges that if planning permission is granted it will be subject to a S106 Legal Agreement, the heads of terms of which will be based on securing the provisions of the construction management plan and a payment in lieu for affordable housing provision as set out above.

9. SUMMARY & CONCLUSION

- 9.1 In providing much needed additional accommodation, the proposed development will optimise the use of this brownfield site whilst also supporting local families in their desire to remain in the local area.
- 9.2 The Proposed Development is a high quality, site specific response that will enhance the appearance of the site and its contribution to the local area, adding to the rich legacy of impressive family homes in the area. The homes have been designed by two architectural practices, and the distinct, exemplary and high quality detailed design of the houses will ensure an appropriate grain and character to the site.
- 9.3 The existing landscape features of note on the site are retained and enhanced. The pond will become the principal landscape feature on site. The boundary edges will be enhanced with a high-quality native mixed wild hedge, combined with a mixture of semi-mature and heavy standard trees. The openings in the hedgerow along Fitzroy Park required for access have been coordinated with the gaps between the buildings, one of which will allow a view through to the pond, enhancing it as an area of private open space.
- 9.4 The proposed development would accord with the general principles of the National Planning Policy Framework. The site is located within an inherently sustainable location in close proximity to existing public transport services and is consistent with the objectives of the new NPPF and the development plan. The site will contribute to the creation of a socially inclusive community, whilst also maintaining and enhancing its environmental importance and quality. It is considered that the proposal would significantly improve the built and natural environment in this location by providing a high-quality development on a site that currently contributes little to the character and appearance of the area.
- 9.5 Careful consideration has to be given to the nature of the site including its relationship to its immediate surroundings, and the amenities of neighbouring occupiers. There is no doubt that a high-quality development will make an effective use of this site and respond to its townscape.
- 9.6 The proposals have been prepared through a detailed pre-application process which has involved relevant consultees and also key local stakeholder groups and members of the public. The proposed development has evolved in response to the feedback received and seeks to meet not only planning policy requirements but also the wider aspirations of the local community.
- 9.7 In summary, the proposed development fulfils the three dimensions of sustainable development as defined by the NPPF and therefore the presumption in favour of sustainable development applies. The proposal is fully in accordance with national and local planning policy providing a scheme that contributes towards the provision of an identified local housing need as well as the overall supply of housing.

9.8 This Planning Statement should be read alongside the other supporting documentation and drawings which have been submitted as part of the Full Planning Application.