

22nd August 2018

Deployment Officer
3D Temple Quay House
2 The Square
Bristol
BS1 6PN

by email to: ctteam@pins.gsi.gov.uk

Dear Sir/Madam,

Appeal by IBN-SINNA Ltd
Site Address: 328 Kilburn High Road, London, NW6 2QN
PINS ref APP/X5210/W/18/3207403

Following your letter dated 29th July 2018, we respond in reference to the updated NPPF. We only highlight updated policy guidance, which is of particular relevance to the scheme.

The NPPF continues to provide a strong emphasis towards supporting sustainable development, with a new expectation for local housing needs to be accommodated unless there are strong reasons not to. In addition to the local housing need figure, paragraph 60 states that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

There are new policies within chapter 5 ('Delivering a sufficient supply of homes of the document') that are particularly relevant to this Appeal, which include the suggestion that 10% of the local housing requirement to be met by small and medium sites, such as the appeal site. Accordingly, the development of this site would assist in meeting this requirement.

Chapter 11('Making effective use of land') of the new Framework sets out how planning policies and decisions should make more intensive use of existing land and buildings, especially where it would help to meet housing need. Of particular relevance to this application is paragraph 118 which states that planning policies and decisions should:

"c) 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;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could

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be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)"

Paragraph 122 states that planning policies and decisions should support development that makes efficient use of land, taking into account various factors, including the identified need for different types of housing.

Paragraph 123 makes it clear that;

"Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

Chapter 12 ('Achieving well designed places') sets out the importance of good design, recognizing that it is a key aspect of sustainable development, creating better places in which to live and work and helps make development acceptable to communities.

Paragraph 130 goes further than previous guidance. It states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, such as with the appeal scheme " design should not be used by the decision - maker as a valid reason to object to development " .

It has been shown in the original application and appeal submission documents that the scheme provides an attractive, well thought out design that provides good quality residential accommodation without having a material impact on neighbours. The scheme maximises a brownfield site which is within the built-up area, providing an appropriate density and scale and therefore, accords with guidelines set out in the new NPPF, promoting higher densities and good quality design which goes some way to meeting a defined need in an area with significant housing need.

For these reasons, it is considered that the scheme complies with all the relevant policies and meets the required standards set out in the new Framework.

Yours faithfully,

[Redacted signature]

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