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Sean Ernsting
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Dear Mr Ernsting,

Appeal site: 67-74 Saffron Hill, London, EC1N 8QX

Appeal by: Mr R Tanielian

Proposal: Erection of additional storey at fifth floor level and erection of additional storey at second floor level (rear/Onslow Street side) to office building (Use B1a)

I refer to the above appeal against the Council's refusal to grant planning permission. The Council's case is largely set out in the Officer's delegated report. The report details the application site and surroundings, the site history and an assessment of the proposal. A copy of the report was sent with the questionnaire.

In addition to the information sent with the questionnaire, I would be pleased if the Inspector could take into account the following information and comments before deciding the appeal.

1. Summary

- 1.1. The application building is 67-74 Saffron Hill. The building fronts onto Saffron Hill (to the west) and Onslow Street (to the east). On the Saffron Hill elevation the building is up to 6 storeys tall and on the Onslow Street elevation it is 7 storeys tall. This is due to a change in land levels between the two streets. The building is in Class B1(a) office use.
- 1.2. The application site is located within the Hatton Garden Conservation Area and is not specifically identified in the Hatton Garden Conservation Area Appraisal and Management Strategy (2017) as making either a positive or negative contribution to the character and appearance of the area. The building is considered to have a neutral impact.

- 1.3. The application site is also within the Hatton Garden Area as defined by the Camden Local Plan 2017.
- 1.4. The planning application that is the subject of this appeal was refused for the following reasons:
 1. *The proposed development, by reason of the fifth floor extension, would result in a material level of harm through loss of outlook and an increased sense of enclosure to adjacent occupiers at No. 60-66 Saffron Hill, contrary to policy A1 (Managing the impact of development) of the London Borough of Camden Local Plan 2017.*
 2. *The proposed development, in the absence of a legal agreement to secure 50% of the additional floorspace as jewellery workshop use, would fail to promote the inclusion of jewellery workshop space in a mixed-use scheme, which is a priority of the Local Plan in the Hatton Garden area, contrary to policies G1 (Delivery and location of growth), H2 (Maximising the supply of self-contained housing from mixed-use schemes) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.*
 3. *The proposed development, in the absence of a legal agreement securing necessary highway works, would fail to secure adequate provision for and safety of pedestrians, cyclists and vehicles, contrary to policies A1 (Managing the impact of development), T1 (Prioritising walking, cycling and public transport) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017.*
 4. *The proposed development, in the absence of a legal agreement securing a Construction Management Plan (CMP) and associated CMP Implementation Support Contribution, would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to policies A1 (Managing the impact of development), T4 (Promoting the sustainable movement of goods and materials) and DM1 (Delivery and monitoring) of the Camden Local Plan 2017.*

2. Comments on appellant's grounds of appeal

- 2.1. The appellant's grounds of appeal are summarised below and addressed beneath as follows:
 1. Impact on outlook and sense of enclosure to the occupiers of 60-66 Saffron Hill
 2. Lack of section 106 legal agreement to secure affordable workspace for jewellery use; highways works contribution; Construction Management Plan

Impact on outlook and sense of enclosure for the occupiers of 60-66 Saffron Hill

- 2.2. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The policy states that the Council will grant permission for development unless this causes unacceptable harm to amenity. The factors to consider include: (e) visual privacy and outlook. The sub-text to the policy notes that protecting amenity is a key part of successfully managing Camden's growth and ensuring its benefits are properly harnessed.
- 2.3. Camden Planning Guidance (CPG) Amenity (2018) supports the policies in the Local Plan. It is a formal Supplementary Planning Document (SPD), which is therefore a material consideration in planning decisions. The CPG notes that: *"Standards of amenity (the features of a place that contribute to its attractiveness and comfort) are major factors in the health and quality of life of the borough's residents, workers and visitors and fundamental to Camden's attractiveness and success. Camden's Inner London location, the close proximity of various uses and the presence of major roads and railways means that amenity is a particularly important issue within the borough"* (para 1.3).
- 2.4. With regards to outlook, CPG Amenity notes that: *"Outlook is the visual amenity enjoyed by occupants when looking out of their windows or from their garden. How pleasant an outlook is depends on what is being viewed. For example, an outlook onto amenity space is more pleasant than an outlook across a servicing yard. Particular care should therefore be taken if the proposed development adjoins properties with a single aspect. Any unpleasant features should be screened if possible, for example with permanent landscaping"* (paragraph 2.13).
- 2.5. The CPG goes on to note that: *"Developments should ensure that the proximity, size or cumulative effect of any structures avoids having an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties by adjoining residential occupiers"* (paragraph 2.14). It also notes that: *"the specific view from a property is not protected as this is not a material planning consideration"* (paragraph 2.15).
- 2.6. The appellant makes reference to previous decisions at the site, including the most recent appeal decision in 2003 (LPA ref: PSX0204458 / PINS ref: APP/X5210/A/03/1114018). At the time of that application the separation distance between the proposed extension and the neighbouring property would have been 9.5 metres and the Inspector noted: *"In my opinion the separation distance of around 9.5m between the opposing elevations would be insufficient to avoid a harmful effect on the outlook of the adjoining occupiers"*.
- 2.7. The appellant notes in paragraph 6.6 of their statement that the current proposal has been revised to increase the separation distance to 11.3 metres which they consider to be acceptable on the basis that the existing gap between the appeal building and the neighbouring residential building is 4.5 metres at the lower levels and: *"The proposed creation of the fifth floor will create a greater separation distance than the existing distance between the*

flats and the appeal site". However, the Council disagrees with this statement. In line with CPG Amenity, insofar as outlook is the visual amenity enjoyed by occupants when looking out of their windows, moving the proposed extension back by an additional 1.8 metres is unlikely to significantly alter the harmful effect on the outlook of the adjoining occupiers.

2.8. In the preceding sentences to the above quote, the Inspector notes: "... *there is a marked difference in the outlook of adjoining occupiers of the flats below the roofline of the appeal property to that of those above. I experienced an overbearing feeling in the outlook from the lower floor flats, which I attribute to the proximity of the appeal property to the principal windows, and a contrasting feeling of openness in the higher floor flats. In my opinion, the height of the roofline of the flank elevation of the appeal property has a crucial effect upon the outlook of the adjoining occupiers. The proposed development would raise this with an additional storey. Although set back by 4.5m, the proposed additional storey would result in a deterioration in the outlook of the adjoining occupiers of the flats on the fifth and sixth floors particularly owing to the proximity of a façade of office windows. In my opinion the separation distance of around 9.5m between the opposing elevations would be insufficient to avoid a harmful effect on the outlook of the adjoining occupiers.*"

2.9. The Council considers that the additional 1.8 metre set-back is not sufficient to prevent the material deterioration of outlook or sense of enclosure to the occupiers of the adjacent residential building. The existing sense of openness would still be lost and their outlook would be towards built form, which is not as pleasant as an open roofscape. The Council recognises that there is no right to a view in planning terms; however, the proposal is considered unacceptable on the basis it would encroach into the currently open skyline and introduce additional built-form much closer to the neighbouring building.

2.10. The appellant goes on to note that: "*whilst it is agreed that the separation gap of 9.5m on the previous scheme was unacceptable, the inspectorate and the LPA has not specified an acceptable distance. The LPA has not justified in policy terms how the existing separation distance of 4.5m is acceptable and the proposed 11.3m is not*" (paragraph 6.6). It is not the role of the Council, or the Inspectorate, to specify measurements which might be considered acceptable in future applications and neither would be it appropriate for planning policy to specify exact measurements either. Instead, each application must be assessed on its own merits taking into account all relevant considerations. It is also worth noting that, just because the lower levels of the building experience a separation of 4.5 metres, this is not justification to allow the same separation distance at the upper levels. This point was made clear by the Inspector's comments for the 2003 appeal (see above).

2.11. The appellant notes in paragraph 6.10 of their statement that the proposed scheme would include a large green roof area which would be viewed by the occupiers of the neighbouring scheme. The appellants consider this to represent "*an improved view*". The Council would like to point out that the green roof measures approximately 90 square metres and would be enclosed on three sides by built form. Although a green roof may be more

attractive than the existing roof of the building, the fact the green roof would be surrounded by built form takes away from its attractiveness as the general sense of openness is lost. The Council does not consider that the proposal would provide a pleasant outlook to occupiers of the neighbouring building.

2.12. The appellant notes in paragraph 6.12 of their statement that CPG Amenity does not provide guidance as to how to measure the impact on the loss of outlook in quantitative terms. However, as above, it is not the role of planning guidance to set out exact measurements to comply with as it would not be feasible or appropriate to do so. Each case must be assessed on its own merits, taking into account all relevant considerations.

2.13. The appellant goes on to state that: “... *given that the LPA has not provided any guidance to measure the impact of outlook, it is considered the 25 degree test can also be applicable to test outlook*” (paragraph 6.12). The Council wholeheartedly disagrees on this point as outlook and sunlight/daylight (which the 25 degree test applies to) are two separate issues. The appellant states that: “*The 25 degree test is used in order to ensure that development benefits from adequate levels of natural light and outlook*” (emphasis added); however, this is not the case, it is not related to outlook at all. As noted in CPG Amenity, the 25 and 45 degree tests help to determine whether a sunlight and daylight report is required. No mention is made of outlook in reference to the 25 or 45 degree tests. It is not appropriate to assume that because the proposals meet the 25 and 45 degree tests that the impact on outlook is acceptable. If this was the case, the Local Plan would not refer to the different issues separately and they would not be dealt with separately in CPG Amenity of the Officer’s report.

2.14. The appellant also states: “*The appellant has also submitted a daylight sunlight report prepared by NRG Consulting, which has not been objected to by the LPA. This means there will still be sufficient outlook for the occupiers of the flats at the fourth fifth and the sixth level*” (emphasis added) (paragraph 6.12). The Council also wholeheartedly disagrees with this statement for the same reasons given in the paragraph above. The Officer’s report specifically notes that the impact on daylight/sunlight is considered acceptable, partly because the appeal building is directly to the north of the neighbouring residential building. It could be argued that because the residential properties facing the application site are single aspect and north-facing (i.e. they already experience low daylight levels and receive no direct sunlight) the impact on outlook is even more important to protect to ensure a decent standard of living for those occupiers.

2.15. To summarise this section, the Council considers that the proposals would have a harmful impact on the outlook of neighbouring occupiers at 60-66 Saffron Hill. For this reason, the Inspector is kindly requested to dismiss the appeal.

Lack of section 106 legal agreement

- 2.16. The Council's reasons for refusal numbers 2, 3 and 4 relate to the lack of a section 106 legal agreement to secure: 2) 50% of the additional floorspace as jewellery workshop use; 3) necessary highways works; and, 4) a Construction Management Plan and associated Implementation and Support contribution. These issues will be addressed in turn below.
- 2.17. The appellant notes in paragraph 6.15 of their statement that they have agreed to the section 106 legal agreement obligations and provided a draft agreement to PINS; however, the Council only received a copy of this document on 15/01/2020. Nevertheless, a draft section 106 agreement prepared by the Council will be provided with this statement.

Affordable workspace for jewellery use

- 2.18. The Council's second reason for refusal relates to the lack of a section 106 legal agreement to secure 50% of the additional floorspace as affordable jewellery workspace, thereby failing to prioritise the jewellery sector in the Hatton Garden area.
- 2.19. The Officer's report and the reason for refusal refer to Policies G1, H2 and DM1 of the Local Plan; however, they should also have referred to Policies E1 and E2. These policies are appended to this statement (Appendix B).
- 2.20. Policy G1 seeks to create the conditions for growth to deliver homes, jobs and infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. Policy H2 seeks to maximise the supply of self-contained housing from mixed-use schemes. Generally, where development involves additional floorspace of more than 200sqm (GIA), Policy H2 requires that 50% of all additional floorspace is self-contained housing; however, this is subject to certain considerations, including: c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area. If the application site is in the Hatton Garden area, Policies E1 and E2 apply.
- 2.21. Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy notes that the Council will support Camden's industries by: g) i.v) promoting and protecting the jewellery industry in Hatton Garden. The sub-text to the policy notes that Hatton Garden has been an established centre for the jewellery industry since the C19th and today the area is home to nearly 500 businesses and over 50 shops related to the industry. In order to promote Hatton Garden as a location for jewellery related uses, the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses through planning obligations.
- 2.22. Policy E2 provides further guidance on the Council's approach to maintaining and securing a range of premises for businesses to support Camden's economy and provide employment opportunities for the borough's residents.

The policy includes a section dedicated to Hatton Garden, which notes that the Council will seek to secure and retain premises suitable for use as jewellery workshops and related uses in Hatton Garden. The Council will also resist development of business premises and sites for a non-business use. The policy goes on to note that where proposals in Hatton Garden would increase total gross internal floorspace by more than 200sqm, the Council will seek 50% of the additional floorspace as affordable premises suitable for the jewellery sector.

- 2.23. The current proposal seeks to add 401sqm of additional floorspace and therefore 200.5sqm should be secured as affordable jewellery workspace. The appellant is proposing to provide 81sqm of the additional floorspace as affordable jewellery workspace within the second floor extension as they note that this is a suitable location as it is to the rear of the building with its own independent access and it benefits from a goods lift.
- 2.24. The provision of 81sqm of floorspace as affordable jewellery workspace is not sufficient and falls short of the policy requirement to provide 200.5sqm of floorspace as affordable jewellery workspace. The provision of 81sqm of floorspace only represents approximately 40% of the policy requirement (and 20% of the overall new floorspace).
- 2.25. The appellant refers in paragraph 6.18 of their statement to planning permission reference 2016/4143/P (dated 27/11/2017). A copy of the decision notice and section 106 agreement are appended to this statement (Appendix C). In that particular case, the section 106 legal agreement secured 90sqm of affordable jewellery workspace at the appeal site and the appellant notes that, despite proactive marketing since November 2017, the space remains vacant. The statement then states: *“This suggests there is currently no economic interest for jewellery space. This would also justify the appellants proposal for 81sqm of jewellery space”* (paragraph 6.18). The Council firmly disagrees on this point. There may be various reasons as to why the jewellery space secured as part of application reference 2016/4143/P remains vacant and it is not appropriate for the Council to comment on this in detail as part of this appeal process.
- 2.26. Notwithstanding the above, the Council would like to point out that the marketing evidence provided by the appellant is lacking in detail. CPG Employment sites and business premises (2018) notes that, as a minimum, the Council would expect marketing exercises to include the following:
- Use of a reputable local or national agent with a track record of letting employment space in the borough;
 - A visible letting board on the property (constant throughout the marketing period);
 - Marketing material should be published on the internet, including popular online property databases such as Focus and should include local or specialist channels where appropriate – e.g. jewellery-specific press in Hatton Garden, through Business Improvement Districts, the GLA’s Open Workspace Group or other workspace providers;

- Existing lawful use of the advertised premises should be included in the marketing materials;
- Continuous marketing over at least 2 years from when the letting board is erected and the property is advertised online (i.e. not simply from when agents were appointed) to the date of the submission of the planning application;
- Advertised rents should be reasonable, reflecting market rents in the local area and the condition of the property;
- Lease terms should be attractive to the market:
 - be for at least three years, with longer terms, up to five years or longer, if the occupier needs to undertake some works
 - and/or include short term flexible leases for smaller premises which are appropriate for SMEs;
 - appropriate rent-free periods should be offered to cover necessary fit out or refurbishment costs.
- A commentary on the number and details of enquiries received, such as the number of viewings and the advertised rent at the time, including any details of why the interest was not pursued; and
- Where there is an existing employment use then we will require evidence that the tenant intends to move out.

- 2.27. The marketing evidence provided by the appellant consists of a 1-page letter from Anton Page (estate agency) which fails to address the majority of the points above. No evidence of a visible letting board is provided; no evidence of the marketing material has been provided (which would show the images used etc.); no evidence of where the marketing material was published is provided (the letter just states: "*We have continued to advertise the property on our own website, Rightmove Commercial and Zoopla. Social media advertising on Instagram and twitter has also continued*"); no evidence has been provided as to whether the existing lawful use of the premises was included in the marketing material; no evidence of the price is provided, and how this compares to the local area; and the full lease terms have not been provided.
- 2.28. The appellant has been made aware of the above marketing evidence requirements in relation to another planning application at the same site [application reference 2019/3163/P: Erection of three-storey extension at second floor level (Onslow Street elevation) to office building (Use B1a) Decision pending.] As such, the Council believes there is no excuse for the lack of detail.
- 2.29. On the basis of the above, the Council does not agree to the appellant's proposal to provide only 81sqm of affordable jewellery workspace.
- 2.30. The Council would also like to point out that it appears as if the space that the appellant is proposing to provide as affordable jewellery workspace is the same space secured as affordable jewellery workspace pursuant to planning permission reference 2016/4143/P. As noted above, the section 106 legal agreement for planning permission reference 2019/4143/P is appended to this statement (Appendix C). Please refer to the plan on page 11 of the section 106

legal agreement, titled "PLAN 2". It is not possible for the appellant to secure the same space as affordable jewellery workspace as part of two separate and unrelated planning applications as they appear to be proposing to do.

- 2.31. The appellant also notes in paragraph 6.18 of their statement that their draft section 106 legal agreement proposes that the jewellery space is available on the market for 12 months at an affordable rent and if it is not leased during this period, the space reverts back to Class B1(a) office use. The Council has provided a draft section 106 legal agreement with this statement which includes a clause to allow the space to revert to Class B1(a) office use if a suitable tenant is not found within 24 months of the date of the agreement; however, this is subject to the provision of evidence of active marketing that has taken place during the 24 month period in accordance with a previously approved Jewellery Workspace Marketing Plan. The clause uses standard wording that has been used in other agreements and the Council does not agree to any other wording.
- 2.32. To summarise this section, the Council considers the provision of 81sqm of affordable jewellery workspace at the site to be unacceptable as the policy requirement is 200.5sqm and insufficient justification has been provided to accept a lower provision. Furthermore, it appears that the appellant is proposing the use of space in the building that has already been secured as affordable jewellery workspace as part of a different and unrelated planning application. For this reason, the Inspector is kindly requested to dismiss the appeal.

Highways works contribution

- 2.33. The Council's third reason for refusal relates to the lack of a section 106 legal agreement to secure necessary highways works.
- 2.34. Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours and the policy notes that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and will require mitigation measures where necessary. The sub-text to the policy notes: *"Highway works connected to development proposals will be undertaken by the Council at the developer's expense. This ensures that highway works, maintenance and materials adopted by the Council are constructed to an appropriate standard. This includes highway works that form part of a planning approval appropriate for adoption, including design and implementation of new routes to be adopted, owned and managed by the relevant Highway Authority. Development requiring works to the highway following development will be secured through planning obligation with the Council to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces"* (paragraph 6.11).
- 2.35. The estimate for the work, prepared by the Borough Engineer, is £8,496.33. This is for repaving the footway directly adjacent to the site. It is considered

that this amount is justified given the size and scale of the development. (See Appendix D for the highways works estimate).

- 2.36. The Council maintains that a payment for highways work should be secured through a Section 106 legal agreement, which would also combine as an agreement under Section 278 of the Highways Act 1980. CPG Transport (2019) notes at paragraph 2.22: *“(The Council) will secure a financial contribution via a combined Section 106 and Section 278 legal agreement for the highway works that the developer will be required to pay before commencing development. This is based upon estimates of anticipated works (including fees) prepared by LB Camden. If in the event that the actual works cost more than originally estimated, the developer will be liable to pay additional costs (up to a maximum agreed figure). On completion of the works, the Council will certify how much money was expended in undertaking the works. If the actual works required cost less than originally estimated, for example if the public highway was not damaged as much as was estimated for, the Council can refund the applicant any unspent financial contribution. The Council may also in some cases require the developer to pay a one-off negotiated returnable bond or contingency sum in addition to the estimated cost, the size of which will be based on the nature, scale and risk associated with the particular works. The developer will also be required to pay the Council’s costs in respect of any necessary traffic management orders or other appropriate costs related to the work where these are identified by the Council.”*
- 2.37. It is not possible to secure a financial contribution for highway works by condition as it relates to land outside the application site which is not under the control of the applicant. Furthermore, Planning Practice Guidance advises that financial contributions cannot be secured by condition (PPG, Using Planning Conditions, paragraph 5).
- 2.38. The contribution is considered to be CIL compliant. It is necessary in planning terms as identified in the development plan to mitigate against the increased impact that will be generated by the development. The contribution has been calculated taking into account the particular characteristics of the development, it is directly related to the development and is fairly and reasonably related in scale and kind to the development. It is also directly related to the development and fairly and reasonably related in scale and kind as it will provide for the new residents and mitigate impacts of the development.
- 2.39. It is understood that the appellant agrees to this obligation.

Construction Management Plan and associated Implementation and Support contribution

- 2.40. The Council’s fourth reason for refusal relates to the lack of a section 106 legal agreement to secure a Construction Management Plan (CMP) and associated Implementation and Support contribution.
- 2.41. Policy T4 of the Local Plan promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road.

Given the nature and scale of development, the method and type of construction that would be involved and the appeal site's location, the Council considers that the legal agreement should secure a full CMP to ensure that the development could be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area.

- 2.42. A planning obligation is considered to be the most appropriate mechanism for securing compliance with a CMP simply because a considerable extent of the activity during construction could cause conflict with other road users or be detrimental to the amenity of the area and will necessarily take place outside of the appeal site. Potential impacts for the proposed demolition/construction works which should be controlled by a CMP include traffic generation from removal and delivery of materials to the site. This could result in traffic disruption and dangerous situations for pedestrians and road users.
- 2.43. Under the Planning Act conditions are used to control matters on land within the developers' control. However, a CMP is designed to be an enforceable and precise document setting out how measures will be undertaken not just on site but also around the site in order to minimise as far as reasonable the detrimental effects of construction on local residential amenity and/or highway safety on the nearby roads. Using a condition to secure the type of off-site requirements usually included in a CMP would in this case be unenforceable.
- 2.44. Conditions can only lawfully be used to control matters on land within the developer's control. Many of the CMP provisions will relate to off-site requirements, particularly public highway (which is not land within the developers' control). As such, a section 106 legal agreement (rather than a condition) is the most appropriate mechanism. This is in accordance with Planning Practice Guidance which states that conditions requiring works on land that is not controlled by the applicant often fail the tests of reasonability and enforceability (PPG, Use of Conditions paragraph 009).
- 2.45. The CMP requirement complies with the CIL Regulations as it ensures that the development is acceptable in planning terms to necessarily mitigate against the transport impacts of the development as identified under the Development Plan for developments of the nature proposed. It is also directly related to the development and fairly and reasonably related in scale and kind as it relates to managing impacts to neighbours and on the surrounding highways from construction at the site.
- 2.46. CPG Transport also notes that an implementation support contribution will also be secured as a planning obligation to cover the cost of reviewing and monitoring the CMP. The CMP for the appeal proposal, if allowed by the Inspector, would require significant input from officers. This would relate to the development and assessment of the CMP as well as ongoing monitoring and enforcement of the CMP during construction. A CMP Implementation Support Contribution would need to be secured via a S106 planning obligation. In this case, the proposed support contribution is £3,136.
- 2.47. It is understood that the appellant agrees to this obligation.

3. Conclusion

- 3.1. Based on the information set out above, and having taken account of all the additional evidence and arguments made, the proposal is considered to be contrary to Policies A1, G1, H2, DM1, E1, E2, T1 and T4 of the Camden Local Plan 2017.
- 3.2. The information submitted by the appellant in support of the appeal does not overcome or address the Council's concerns. The proposal presents no benefits that would outweigh the harm identified.
- 3.3. For these reasons the Inspector is respectfully requested to dismiss the appeal. However, should the Inspector be minded to approve the appeal, suggested conditions are included in Appendix A.
- 3.4. If any further clarification of the appeal submission is required please do not hesitate to contact Kate Henry on the above direct dial number or email address.

Kind regards

Kate Henry
Senior Planning Officer
Regeneration and Planning
Supporting Communities