

23 Ravenshaw Street, London, NW6 1NP

NEW APPLICATION

25th October 2021

This covering letter is to inform you of a new application, Ref. PP-10311297, being submitted via the Planning Portal today, along with all the supporting documents. The application is identical to that subject to appeal, PINS Ref. 3281530. It is submitted due a number of circumstances, relevant to the consideration of the proposal, having changed since the refusal of the previous application which led to the appeal. This new application asks the planning authority to consider the proposal in light of these new circumstances.

The circumstances which have changed are:

- 1) A new NPPF which emphasises the need to develop realistic and meet housing delivery rates.
- 2) A new London Plan, which lays greater emphasis on the need to intensify densities wherever possible.
- 3) The failure of the Planning Authority to meet its most recent housing delivery test targets.

These issues are explained in the appeal statement which we are also putting forward in support of this application.

The appeal statement relates to and refutes the two reasons for refusal and its arguments are relied on in this new application. In brief they are:

- a) The reasons for refusal relating to the appearance of the rear of the proposed development, and the case officer's report in support, did not make mention of a line of mature trees that effectively obscures views from across the rail tracks. Views of the rear of this proposal from a residential development across the rail tracks and a tower block on Mill Lane were stated to be harmful to the occupiers of these developments.
- b) No explanation was given as to what form of harm this might be.
- c) The case officer's report and the reasons for refusal objected to the design and appearance of the rear of the proposal, but failed to indicate that such views would be highly restricted to adjoining gardens and no other viewpoints.

- d) The nature of the harm to these properties was not explained.
- e) While the proposal is within a Local Flood Risk Zone, the required site-specific flood assessment demonstrates conclusively that no flooding would occur to this proposal. As such, this reason for refusal was not based on government recommendations and requirements as to how such proposals should be assessed, namely site-specific assessments.
- f) The appeal statement reveals an unacceptable and unjustifiable degree of inconsistency in decision making on key aspects of this case by the Planning Authority compared to recent decisions in the local area raising similar and identical issues and in comparable circumstances.

For all these reasons, the Planning Authority is asked to consider this application in the light of the above circumstances.

Roger Tym BEM MA

Quilichan Consultancy

Consultant to Applicant, Mr Christopher Taylor

25th October 2021