

**RAPLEYS**

Proof of Evidence of  
Duncan Neil Parr BA DUPI Dip TP FRGS MRTPI Cgeog MEWI

# PANDA HOUSE, 628 - 634 COMMERCIAL ROAD, LONDON

Planning Inspectorate Ref -  
APP/A2280/W/20/3259868

**December 2020**

**Our Ref: DNP/16-00972**

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## Contents

1	Qualifications and Experience.....	1
2	Introduction and Context .....	1
3	Planning Policy .....	3
4	Need (Reason 1 Part 1) .....	6
5	Low Cost Housing (Reason 1 Part 2) .....	8
6	Other Policy and Development Management Considerations ..	10
7	Matters Raised from third parties.....	11
8	S106 and Conditions .....	11
9	Planning Benefits.....	12
10	Planning Balance and conclusions .....	13

## Appendices

Appendix 1	Heritage Note - KM Heritage
Appendix 2	Energy Note - MES Building Solutions
Appendix 3	Transport Note - TPP

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## **1 QUALIFICATIONS AND EXPERIENCE**

- 1.1 My name is Duncan Neil Parr. I hold an Honours Degree of Bachelor of Arts (Geography) from the University of Staffordshire and Post Graduate Diplomas in Urban Planning Implementation and Town Planning from the University of Westminster. I am a Member of the Royal Town Planning Institute, a Fellow of the Royal Geographical Society, a Chartered Geographer, a Law Society registered witness and a Member of the Expert Witness Institute.
- 1.2 I am a Planning Partner of Rapleys LLP, my office being 33 Jermyn Street, St. James's, London, SW1Y 6DN. I have over 30 years of Planning Consultancy experience. I have advised a wide range of clients, including developers, landowners, commercial companies, local authorities and voluntary organisations.
- 1.3 My evidence will focus on town planning matters with other witnesses being called to address other aspects of the case.
- 1.4 I am providing evidence at this Inquiry as an independent professional.

## **2 INTRODUCTION AND CONTEXT**

- 2.1 This Proof of Evidence has been prepared on behalf of the Appellant in respect of the appeal at Panda House (APP/A2280/W/20/3259868).
- 2.2 The application seeks permission to create 109 rooms for short-term hostel and HMO accommodation. 31 hostel units are proposed and located within the lower ground and ground floors, with 78 HMO units proposed and located on the upper floors.
- 2.3 Planning permission was first granted at the site in 2012 (ref. PA/11/02318) for the extension of the existing building upward to five-storeys, to increase the number of rooms within the hostel. This permission was not implemented and has now expired. Nevertheless, the permission establishes a principle of development for a larger hostel building and number of rooms at the site.
- 2.4 The proposals will deliver a high quality hostel and HMO accommodation for which it has been illustrated there is a high demand. The regeneration of the site, which will assist in meeting a housing need in line with national and local policy, will improve the overall quality of the site and thus contribute to a vibrant and more attractive local area.
- 2.5 In this context, the appellant's evidence demonstrates that planning permission should be granted on the grounds that:
- The proposals are sustainable development in a highly sustainable location where the redevelopment to provide high density is supported in principal
  - There is an increasing need for developments such as this proposal, the projected supply-demand imbalance is expected to widen further over the next five years with an estimated 9,015 'sharers' unable to access licensed HMO accommodation in Tower Hamlets.
  - The proposals provide an additional supply of low cost housing which can provide housing with shared facilities for low incomes.
  - The Proposal will bring a range of economic, social and environmental benefits to deliver a sustainable development in the local area.
  - Regeneration of a run-down site.

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- 2.6 As this appeal was originally proposed to be dealt with by way of a Hearing a detailed Statement of Case was produced. I am familiar with this and as agreed at the pre Inquiry meeting, I will make reference to it rather than repeating it in my evidence.
- 2.7 At the pre Inquiry meeting it was advised that the issues of need and viability would be considered through formal written evidence with the other issues discussed at round table sessions based on the statements of case.

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### 3 PLANNING POLICY

- 3.1 The relevant policies are outlined at section 5 of the Statement of Common Ground (SOCG) and the application / consideration of these addressed in my evidence below.

#### THE DEVELOPMENT PLAN

- 3.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to determine planning applications in accordance with the Development Plan, unless material planning considerations indicate otherwise.
- 3.3 The Development Plan consists of the Local Plan (2020) and London Plan (2016).
- 3.4 The most important policies are outlined below. It is considered that these policies are up to date and should carry full weight in the determination of the planning appeal.

#### Local Plan 2020

- 3.5 Policy S.DH1 (Delivering High Quality Design) - As outlined within the Appellant's statement of case the proposals are of an appropriate scale, height and mass and represent good urban design. It is therefore considered that the proposals are in accordance with policy S.DH1.
- 3.6 Policy D.DH2 (Attractive Streets, Spaces and Public Realm) - The proposals improve the active frontage with commercial road. Good urban design techniques allow for the attractive proposal which sits well within the street scene. It is therefore considered that the proposals are in accordance with D.DH2.
- 3.7 Policy S.DH3 (Heritage and the Historic Environment) - As confirmed within the appellants statement of case it is considered that the proposals preserve the setting of nearby heritage assets. As such, the proposals are in accordance with Policy S.DH3.
- 3.8 Policy D.DH8 (Amenity) - The appellants statement of case and accompanying reports considers future residents' amenity. In short, the proposals enhance amenity space while also protecting privacy and access to daylight and sunlight. It is therefore considered that the proposals are in accordance with policy D.DH8.
- 3.9 Policy S.H1 (Meeting Housing Needs) - The proposals help assist the borough in meeting its housing need. It is therefore considered that the proposals are in accordance with policy S.H1.
- 3.10 Policy D.H2 (Affordable Housing and Housing Mix) - As confirmed within the viability report, the proposals are unable to provide affordable housing. However, the scheme does provide an alternative to low cost C3 housing. It is therefore considered that the proposals are in accordance with policy D.H2.
- 3.11 Policy D.H3 (Housing Standards and Quality) - The proposals meet the relevant housing standard requirements. It is therefore considered that the proposals are in accordance with policy D.H3.
- 3.12 Policy D.H7 (Housing with Shared Facilities (Houses in Multiple Occupation) - The proposals are in full accordance with Policy D.H7.
- 3.13 Policy S.ES1 (Protecting and Enhancing our Environment) - The proposals are supplemented by an Air Quality Assessment and Energy report. These conclude that the proposals are in accordance with policy S.ES1.
- 3.14 Policy D.MW3 (Waste Collection Facilities in New Development) - Appropriate waste collection and management is provided within the proposals. As such, the proposals are in accordance with policy D.MW3.

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- 3.15 Policy S.TR1 (Sustainable Travel) - The proposals promote sustainable travel and are located in a high accessible location. The proposals are in accordance with policy S.TR1.
- 3.16 Policy D.TR2 (Impacts on the Transport Network) - The proposals will have no greater impact on the highway network than existing. It is therefore considered that the proposals are in accordance with Policy D.TR2.
- 3.17 Policy D.TR3 (Parking and Permit-Free) - The proposals are promoted car free in a sustainable and accessible location. Adequate cycle parking is provided within the scheme. It is therefore considered that the proposals are in accordance with policy D.TR3.
- 3.18 Policy D.TR4 (Sustainable Delivery and Servicing) - Considering the existing use, the proposals will have no greater impact on the highway network. Appropriate servicing is possible and is demonstrated within the submitted transport work. The proposals are in accordance with policy D.TR4.
- 3.19 Policy S.SG5 (Developer Contributions) - Notwithstanding the disagreement between the parties on affordable housing, all other s106 contributions have been agreed and the parties are progressing a s106. The proposals are in accordance with Policy S.SG5 and for that reason, it is understood that reason for refusal 7 is likely to be withdrawn by the Council.

#### London Plan 2016

- 3.20 A list of relevant London Plan policies are outlined below.
- Policy 3.5 (Quality and Design of Housing Developments) - the proposals are in accordance with Policy 3.5.
  - Policy 5.2 (Minimising Carbon Dioxide Emissions) - the proposals are in accordance with Policy 5.2.
  - Policy 6.3 (Assessing effects of development on transport capacity) - the proposals are in accordance with Policy 6.3.
  - Policy 6.9 (Cycling) - the proposals are in accordance with Policy 6.9.
  - Policy 6.13 (Parking) - the proposals are in accordance with Policy 6.13.
  - Policy 7.4 (Local character) - the proposals are in accordance with policy 7.4.
  - Policy 7.8 (Heritage assets and archaeology) - the proposals are in accordance with policy 7.8.
  - Policy 7.14 (Improving air quality) - the proposals are in accordance with policy 7.14.

#### **SUMMARY**

- 3.21 All the policies cited in the reasons for refusal are relevant to this appeal and up to date in their objectives. In my view however the key determining issues are Need and Heritage and it is the policies which relate to these issues which are most significant and should carry most weight. In the context of the reasons for refusal, it is evident that planning policy supports the provision of HMO accommodation. On this basis and in respect of Policy D.H7 (most significant policy) the following is important:
- a. the proposals meet an identified need (see below);
  - b. do not result in the loss of existing C3 units;
  - c. Provide a long term addition to the supply of low cost housing (see below);
  - d. Is located with a very high PTAL rating 5 - 6a;

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- e. The proposals protect amenity for future residents and surrounding neighbours;
  - f. The proposals comply with all the relevant housing standards
- 3.22 The proposals will not cause any harm to heritage assets and are therefore in accordance with Policy S. DH3.
- 3.23 In summary, I considered that the proposals are in accordance with the Development Plan. Therefore, in accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning permission should be granted unless material considerations indicate otherwise.

#### NATIONAL PLANNING

- 3.24 Relevant Central Government Policy is contained within the National Planning Policy Framework (the “Framework”), adopted in February 2019 (as amended) and its accompanying National Planning Practice Guidance (NPPG), adopted/launched online in 2014.
- 3.25 The Framework (2019) is underpinned by a presumption in favour of sustainable development. In terms of decision taking, paragraph 11 and the NPPG advises that Local Planning Authorities (LPAs) should seek to approve development proposals which accord with the Development Plan without delay, or grant planning permission for proposals where the Development Plan policies are out-of-date - unless any adverse impact of doing so would significantly outweigh the benefits, or the application of policies in the Framework (2019) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (including designated heritage assets).
- 3.26 Relevant NPPF paragraphs are:
- Paragraph 59 - boosting supply of housing
  - Paragraph 61 - different housing needs
  - Paragraph 102 - transport
  - Paragraph 109 - highways impact
  - Paragraph 110 - highways aims
  - Paragraph 118 - 122 - making effective use of land
  - Paragraphs 124-132 - design
  - Paragraph 189, 192, 193 and 196 - proposals affecting heritage assets
  - Paragraph 200 - 201- Conservation Area
- 3.27 The proposals are in accordance with National Planning Policy Framework and there are no other material considerations which would indicate the planning permission should be refused.

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#### 4 NEED (REASON 1 PART 1)

- 4.1 The decision notice as part of reason for refusal 1 outlines, *‘the proposed development fails to demonstrate the need for the proposed large-scale HMO use on the site’*. In doing so reference is made to Policy D.H7. In my opinion the Appellants have demonstrated a need for the proposals and the Council have misapplied Policy D.H7 in refusing the scheme.
- 4.2 Planning Policy doesn’t set supply targets for the provision of low cost residential accommodation such as hostels and HMO’s, leaving it to market forces. The NPPF, London Plan and Local Plan (para 9.69) do all however acknowledge the benefits that providing a range of accommodation such as elderly, student and low cost housing brings. They generally support it’s provision but in the case of the Council, they require the need for low cost accommodation to be demonstrated.
- 4.3 For general housing needs (class C3) policy does set minimum supply targets based on demand statistics. This is allocated to each Local Planning Authority, but provision of additional housing isn’t considered detrimental/harmful. It is not necessary to demonstrate in principal a need for this housing on any particular site unless it is subject to restrictive policy’s such as employment designations or Green Belt.
- 4.4 I see no reason why “low cost” residential accommodation would have any different detrimental or harmful effects than normal C3 housing, if introduced into a locale. Perhaps other than in some cases where there is an over concentration, which I discuss further below. In my view therefore, the Council’s need requirements and their application must be considered very carefully.
- 4.5 Policy D.H7 (1a) supports ‘low cost housing’ where it ‘meets an identified need’. It doesn’t however explain why firstly this test must be met, secondly what harm would be caused if it isn’t and thirdly how that need should be assessed. As there is no national, regional or local guidance on how ‘need’ should be assessed the applicant had to consider the need issue more broadly and it is my opinion that this has been considered appropriately.
- 4.6 As part of the application submission the Appellant sought to show ‘need’ through 2 routes. Firstly, their own knowledge and experience as long term operators in the sector. I do not rehearse this in my evidence here. However, I do note that the council haven’t disputed this evidence but contend that is isn’t sufficient to meet the policy test.
- 4.7 Secondly Matthew Bowen of Knight Frank was commissioned to undertake numerical analysis of relevant housing data. This work is subject to separate evidence and I don’t therefore deal with it further here. There are 2 points I do draw; firstly, whilst the Council raise criticism of the extent of the ‘needs assessment’ they don’t provide any contrary evidence of their own. Secondly, that Matthew Bowen concludes that there is a significant growing need with the projected supply - demand imbalance, expected to widen further over the next few years. In my opinion the proposals therefore comply with Policy D.H7 (1a).
- 4.8 Notwithstanding their criticism of the Knight Frank assessment, the Council do not appear to be contending that no ‘identified need’ has been shown, just the evidence is insufficient. The key criticism seems to be that whilst the Knight Frank report assesses ‘need’ on a borough wide basis, policy D.H7 (1a) requires it to be assessed in a specific location. In my view this is neither a correct reading of policy D.H7 (1a) or practical in practice.
- 4.9 From a practical point of view, data doesn’t exist to analyse ‘low cost housing need’ in the specific location of an application proposals. Notwithstanding this, it is inappropriate to consider it on this basis. Low cost housing need isn’t limited to a multitude of small geographical areas, whether specifically in the London Borough of Tower Hamlets or Great London as a whole. Potential tenants of the appeal scheme would come from a wide



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catchment area, but this doesn't suggest that either an 'identified need' doesn't exist or hasn't been demonstrated.

4.10 It is not clear to me why the Council consider occupants of Low Cost Housing to be less mobile than occupants of C3 housing (demand/need for which is assessed on a borough wide basis). In my view, if anything they are likely to be more flexible in their location requirements as the accommodation is only likely to be required on a more temporary basis.

4.11 In my opinion, the Appellant has clearly demonstrated a need for the proposal as required by policy D.H7 (1a)

4.12 As I have noted above the council have sought to apply a location element to the 'needs test'. I can only assume they have drawn this from the supporting text to policy D.H7 in paragraph 9.69. This states:

*Para 9.69 - The Greater London Authority (GLA) household projections suggest there is an increasing demand for HMO-style accommodation in the borough, particularly among young people. The number of 'other type' households (which includes HMOs) headed by persons aged 16- 34 is projected to rise from 12,295 in 2016 to 16,555 in 203136. High quality, large-scale HMOs can help meet this need. This will need to be demonstrated with regards to the specific scheme and location (Part a).*

4.13 To me it is clear this supporting text is saying high quality large scale HMO's can meet the needs of young people. Secondly that schemes will need to show they can help meet this need from young people through their design and location. This appeal proposal with small low cost rooms are highly suitable to meet the needs of young people. The site is in a highly sustainable location and with it's existing hostel use also demonstrates it ability to meet the needs of young people. The proposal therefore fulfils the guidance of para 9.69.

4.14 The council have however sought to apply para 9.69 more generally to the issue of need for HMO/Hostel accommodation. This doesn't reflect the preceding commentary in the paragraph from the GLA. It is also, as I have highlighted, not necessary, practical or reasonable. In addition it must be remembered this is supporting text giving guidance on the application of the policy not a policy requirement in itself.

4.15 If I am wrong and it is concluded that the proposal hasn't been fully shown to meet local needs, I highlight the following point. The Council have provided no evidence to show there is no such need. When the Council generally wish to encourage the provision of a greater amount and range of residential accommodation, I don't see the requirement (other than over concentration) for the needs assessment. I do not believe that the council are claiming 'over concentration' a harmful affect in this case. Therefore, even if 'no clear cut need' is demonstrated, I don't consider the proposal would be contrary to the objectives of policy D.H7.

4.16 In addition, the proposals comply with the other criteria of D.H7. I deal with the issue of affordable housing below

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## 5 LOW COST HOUSING (REASON 1 PART 2)

- 5.1 The decision notice also under reason for refusal 1 outlines, *‘the proposal fails to provide an affordable housing contribution’*.
- 5.2 Similar to above, this is addressed through Policy D.H7 where it is outlined that new HMO’s will be supported where they, *‘can be secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing.’*
- 5.3 Detailed evidence on this issue of viability is provided on behalf of the Appellant’s by Mr James Brown. In summary, the Appellant’s case is two fold; firstly, it is not viable for the scheme to provide affordable housing and secondly, as acknowledged by Dr Anthony Lee, the Council’s viability witness, at the rents proposed the proposals would all be affordable. In his view, this would however need to be controlled going forward. The Appellant is not agreeable to future rents being linked to London Living Rent level, over which they have no influence, as these are controlled by policy decisions and not financial factors. They would however be willing to have it set at an agreed percentage discount from market rent ensuring it remains low cost.
- 5.4 It is concluded at paragraph 4.11 of the Appellant’s Statement of Case, that proposals provide an appropriate option for low cost housing in line with Policy D.H7. Additionally, and in-line with Policy S.H1, the proposal meets the needs of a specific group of people, while also supporting a variety of housing products in the market. Similarly, the regeneration improves social facilities and environmental amenity in line with the strategic policy approach.
- 5.5 In conclusion on this issue, the proposals is supported by Policy D.H7. It will provide a “secured long term addition to the supply of low cost housing”. It will also provide based on viability an “appropriate amount of affordable housing”.

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## 6 OTHER DEVELOPMENT MANAGEMENT CONSIDERATIONS

### AIR QUALITY

- 6.1 At the application stage, the environmental health officers had no objection to the proposals subject to conditions. However, and to provide officers with further comfort, an Air Quality assessment has been provided and will be submitted before the Inquiry.
- 6.2 As a consequence of the above, it is understood that this aspect of reason for refusal 6 has been withdrawn by the Council.

### ENERGY

- 6.3 An updated energy report (appendix 2) has been prepared and submitted to the Local Authority for their consideration. It is understood this satisfies officer concerns and as such, this part of the reason for refusal will be withdrawn.

### TRANSPORT

- 6.4 An updated transport note (appendix 3) has been submitted to the Local Authority which responds to officer concerns regarding cycle access and storage, waste storage and collection, trip generation and accessible parking space. It is understood this will satisfy officers and as such, reasons for refusal 4 and 5 will be removed.

### ARCHAEOLOGY

- 6.5 It has been agreed between the Appellant and GLAAS that historic records will be reviewed once these reopen again (post covid restrictions). If possible, this will be completed before the Inquiry opens however, if these are not open an appropriately worded condition will need to be agreed between the Local Authority and Appellant.

### S106

- 6.6 A section 106 is being prepared between the Appellant and Local Authority and this will be finalised ahead of the Inquiry opening.

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## 7 OTHER POLICY AND DEVELOPMENT MANAGEMENT CONSIDERATIONS

7.1 The remaining reasons for refusal are addressed within the Appellants Statement of Case, accompanying reports and rebuttals and these matters will be determined by the way of round the table discussions (Hearing), instead of the formal test of evidence which will be undertaken for the above two matters (need and viability).

7.2 I therefore considered that no further detailed commentary is required on these matters. I do however briefly comment on the policy issues raised in the reasons for refusal. A revised SoCG is being prepared which will confirm the areas of agreement and, at this stage, it is considered that a number of matters will either be resolved or greatly narrowed.

7.3 Dealing firstly with conservation and design.

1. In terms of the proposals impact on the Conservation Area, it is the Appellant's view that the proposals will protect and enhance the overall character and appearance of the area. Additionally, given the local context and views of the church (which are restricted), the design protects the listed building, the setback top floor allows for direct sight of the Church Tower as you travel under the railway. As such, I do not consider that any harm would occur. Therefore, the proposal complies with Local Plan Policy S.DH3 , London Plan Policy 7.8 and NPPF guidance regarding the protection of such assests.
2. The proposed design is of a high quality and positively takes into account the local character. The scale and massing reflect the the surrounding area, similar height buildings are common with the vicinity of the site. As such, I am of the view that the proposals are in accordance with Local Plan S.DH1, London Plan policy 7.6 and chapter 12 of NPPF.
3. The proposals provide sufficient outdoor amenity space and adequate lit communal space. The appellant can confirm that the building regulations lighting levels can be achieved, and compliance would be demonstrated through detailed design at that stage. As such, I am of the view that the proposals are not in conflict with policies D.H3, D.H7 and D.DH8 of the Local Plan.

7.4 Following the Council's statement of case and recent discussions with planning offices at the Council, the Appellant's team have prepared additional evidence which it considerers will provide the Council with enough comfort to remove the following matters from the reasons for refusal:

- Archaeology - Part Reason 2
- High Safety - Reason 4
- Cycle Parking - Part Reason 5
- Waste - Part Reason 5
- Air Quality - Part Reason 6
- Energy - Part Reason 6
- S106 - Reason 7

7.5 Notwithstanding the above, I am of the view that adequate information has been provided to the Council and that no harm would be caused by any of these issues and appropriate scheme details could be controlled by condition. The proposals therefore comply with:

Local Policy S.DH3 - Archaeology

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Local Policy S.TR1 and D.TR2 - Transport

London Plan Policy 6.9 - Cycle Parking

London Plan Policy 5.17 and Local Plan Policy D.MW3 - Waste

London Plan Policy 7.14 and Local Plan Policy D.ES2 - Air Quality

Local Plan Policy D.ES7 - Energy and Sustainability

## **8 MATTERS RAISED FROM THIRD PARTIES**

8.1 The vast majority of representations received as part of the appeal do not raise any new points however, and considering the majority are commenting on heritage matters, please find appended short note from KM Heritage (appendix 1). The specific detail and consideration of this matter is to be dealt with via round the table discussions.

## **9 S106 AND CONDITIONS**

- The appellant is happy with the conditions as proposed within the Council's Statement of Case.
- Additionally, the appellant is happy in principal to the s106 contributions which are sought to address different matters.

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## 10 PLANNING BENEFITS

10.1 The planning benefits are outlined within section 4 of the Appellants Statement of Case and can be summarised accordingly:

### Social

- The proposal will provide a modern high quality hostel and HMO accommodation - which should attract moderate weight.
- The regeneration of the site will assist in meeting a housing need in line with national and local policy - which should attract significant weight.
- The regeneration will improve the overall quality of the site and this contribute to a vibrant and more attractive local area - which should attract moderate weight
- The high quality interior build out and improved exterior design will modernise the unattractive existing building - which should attract moderate weight
- Promote social interaction in welcoming and usable social spaces - which should attract limited weight.

### Economic

- Direct employment opportunities throughout the redevelopment through approximately 125 construction jobs. - which should attract moderate weight
- When operationally, the site will directly employ 18 FTE people - which should attract limited weight
- In addition to construction cost, which will generate circa 14 million, the proposals will directly result in circa 1.5 million of local spend expenditure - which should attract limited weight
- The redevelopment of the site will help create a more attractive place to live and work - - which should attach moderate weight

### Environmental

- The proposals will promote sustainable modes of travel - which should attract significant weight
- The proposed amenity space and roof design will include ecological and biological enhancements - which should attract limited weight
- The updated sustainable design will improve overall environmental efficiency in accordance - which should attract moderate weight
- The design will protect the visual and residential amenity of existing and future residents - which should attract limited weight
- They'll be an improved relationship with the adjacent Church and and Conservation Area - which should attract moderate weight.

10.2 In summary, the proposals will introduce a high quality housing development with environmental benefits to the currently outdated site. The redevelopment will not only improve the overall housing stock through modern and up to date HMO / Hostel units but also, the sustainable design and improved amenity green spaces will help create a sustainable and vibrant proposals helping to promote the attractiveness of the local area.

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## **11 PLANNING BALANCE AND CONCLUSIONS**

- 11.1 The Proposed Development is in accordance with the Development Plan taken as a whole meaning that permission should have been granted without delay. For the purposes of section 38(6) of the Planning and Compulsory Purchase Act 2004, other material considerations including the NPPF, NPPG, other relevant policy and guidance similarly favour the grant of planning permission.
- 11.2 As such, and in accordance with paragraph 11 (c) of the NPPF, the presumption in favour of sustainable development is engaged and therefore, as outlined above, planning permission should have been approved without delay.
- 11.3 Further, the proposals are considered to generate substantial benefits, with reference to the three roles of planning, which further support the grant of planning permission.
- 11.4 In regards to heritage impact, as confirmed within the Appellant's Statement of Case and accompanying reports it is considered that the proposals will preserve nearby heritage assets and therefore, there isn't any material harm. However, if less than substantial harm is deemed to occur (which it can only reasonably be at the very low level), the varied and substantial benefits outlined above in my opinion all outweigh this harm in favour of the grant of planning permission in accordance with NPPF Para 196.
- 11.5 The proposal will not harm, but rather bring significant benefits to the Borough as well as Greater London and support a national objective to provide additional housing in sustainable locations. The planning balance therefore also firmly lies in favour of the grant of planning permission to outweigh any alleged conflict with the Development Plan. The appeal should be allowed and planning permission granted.