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# Planning Statement

**Demolition of existing building and redevelopment to provide 14 apartments, associated parking and amenity space**

22-23 St George's Terrace  
Herne Bay  
CT6 8RH

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**March 2021**

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# Executive Summary

1. This planning statement sets out how the proposed development complies with both national and local planning policies and will provide a sustainable and much needed enhancement to the local area. In summary, the key facts of the case can be summarised as follows:
  - The proposal seeks full planning permission for the demolition of the existing care home building and erection of a new building to provide 14 X residential apartments.
  - The development will make efficient use of previously developed land in a highly sustainable Town Centre location and will comfortably sit within its existing context;
  - The design of the proposal has been carefully considered and has evolved following engagement from the LPA over the course of previous applications in order to better sit within the street scene and will provide a building that is more in keeping with the character and appearance of the Conservation Area satisfying the test to preserve or enhance.
  - The proposed residential development will provide high quality accommodation which exceeds technical housing space standards;
  - The proposal is in close proximity to local recreational space, everyday shops/services and public transport options (including a train station), thereby reducing reliance on the car;
  - There are no detrimental social, economic or environmental harms which outweigh the benefits of the proposed development. Consequently, on balance, the planning application should be granted planning permission.
2. The applicant would like to continue to work proactively with the local planning authority. Consequently, please do not hesitate to contact us should you have any questions.

# Introduction

3. This planning statement has been prepared by Plainview Planning Ltd. in support of a planning application for the re-development of 22-23 St George's Terrace, Herne Bay, CT6 8RH. The development will create 14 X residential flats (C3).
4. This scheme is proposed following the approval of a scheme for 10 flats via the partial demolition and conversion of the existing building on the 3rd of October 2017 and the approval for a scheme for 12 flats and complete demolition of the existing building.
5. This application proposes a viable scheme for 14 market houses via the redevelopment of a site that is in desperate need of regeneration in order to preserve and enhance the character and appearance of the Conservation Area.
6. Supporting plans and reports have been provided to demonstrate that the proposal is in accordance with both national, local planning policies and guidance. Contributing reports include:
  - Design and Access Statement (prepared by Urban and Rural Limited);
  - Supporting Plans (prepared by Urban and Rural Limited);
  - Financial Viability Report;
7. This planning statement demonstrates how the proposal responds to the planning requirements set out in the National Planning Policy Framework (2019), Canterbury District Local Plan (2017), the Herne Bay Area Action Plan 2010 and the relevant supplementary planning guidance documents.

# Site Context and Designations

## The Proposal Site

8. The application site is situated to the south of St George's Terrace and overlooks the North Kent coast. The existing building is made up of two poor quality semi detached circa 1912 buildings that have been significantly extended into the rear of the site. The site is derelict, but was last used as a nursing home (C2) with 22/25 bedrooms.
9. Commercial and residential developments within the immediate area vary in size, scale, design and character. The properties immediately adjacent to the site consist of detached two storey pitched roof houses (west), a 1960s house and a 4 storey Regency terrace (east).

## Flood Risk

10. The site is within flood zone 1.

## Planning Policy Map Designations

11. According to the Canterbury Local Plan Proposals Map 2017, the proposal site lies within Herne Bay Urban area, in the Herne Bay Town Centre, Herne Bay Action Area, The Herne Bay Conservation Area, the SAMM area for the Thanet Coast and Sandwich Bay 7.2km Zone of Influence.
12. The Herne Bay Action Area proposals map does not apply any specific designations for the site.
13. These considerations have been discussed in the planning policy section of this report.

## Planning History

14. There have been a number of historic planning applications and appeals on the site, this is confirmed by the Canterbury planning application database. The relevant applications and appeals are included below;

Date	Reference	Description	Decision
2013	CA/13/01848	Application for a Lawful Development Certificate or a proposed use to be assisted living for 18-65 year olds and would operate 24 hours a day.	Would be lawful
2017	CA/16/02945	Proposed erection of a 4 storey building	Refused

		comprising of 14 apartments, 3 x 3 bedroom units, 7 No 2 bedroom units and 4 No 1 bedroom units with parking, following demolition of existing building.	
2017	APP/J2210/W/17/3186722	Appeal for - Proposed erection of a 4 storey building comprising of 14 apartments, 3 x 3 bedroom units, 7 No 2 bedroom units and 4 No 1 bedroom units with parking, following demolition of existing building.	Dismissed
2017	CA/17/01632	Proposed change of use from care home to residential; together with two-storey rear and roof extension, entailing rooflights to front with 3no dormers and rooflights to rear, to provide 10 apartments.	Approved
2020	CA/20/00140	Proposed residential development of 12 apartments, following demolition of existing building.	Approved Expires 12/03/2024

15. There is also an extant permission in place for the adjacent site - 21 St George's Terrace.

2016	CA/16/01868	Proposed four-storey building containing 7 apartments following demolition of the existing dwelling.	Approved This permission has been implemented
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16. It is well established in case law that previous planning decisions are capable of being material considerations. The reason for this is explained by Mann LJ in *North Wiltshire District Council v Secretary of State for the Environment* (1993) 65 P & CR 137 who noted:

17. *"One important reason why previous decisions are capable of being material is that like cases should be decided in a like manner so that there is consistency [...]. Consistency is self-evidently important to both developers and development control authorities. But it is also important for the purpose of securing public confidence in the operation of the development control system."*

18. A number of matters have been previously agreed as part of the extant permission CA/20/00140 and within the dismissed appeal APP/J2210/W/17/3186722 such as parking, amenity, design, massing, demolition, heritage, impact on the Conservation Area, loss of the existing use and Ecology. The applicant therefore requests that

consistency in decision making is maintained here. For completeness, commentary on the various considerations of this application has been included below.

# The Proposed Scheme

19. The application site currently contains a two storey pitched roof building that is used as a nursing home (C2) and associated outdoor space to the rear. The proposed development seeks to demolish the existing building and redevelop the site to provide 14 X residential flats within a 4 storey pitched roof building.
20. The mix of residential flats comprises of 4 X 1 bed, 7 X 2 bed and 3 X 3 bed flats. 8 X private car parking spaces are proposed to the rear and 2 to the front. A total of 10 private car parking spaces.
21. The materials and colours proposed have been chosen to reflect the appearance of buildings within the immediate area and to positively reflect local townscape character (please see page 14 - 'Appearance', of the supporting design and access statement).
22. The supporting design and access statement provides a detailed analysis of how the final design responds and celebrates the character and history of the surrounding character area 2A of the Herne Bay Conservation Area.

**Figure 1:** The Proposed Development (street view from St George's Terrace)





# Planning Policy

23. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that decisions must be made in accordance with relevant Development Plan Documents unless material considerations indicate otherwise.
24. The relevant policies against which to assess this proposal are contained within the Canterbury District Local Plan 2017, the Herne Bay Area Action Plan 2010, the National Planning Policy Framework 2019 (NPPF) and the relevant supplementary planning guidance documents.

## *Canterbury District Local Plan (2017)*

- SP1 - Sustainable Development
- SP4 - Residential Development Directed to Urban Areas
- SP6 - Strategic Access Management and Monitoring (SAMM) Mitigation Measures for the coastal Special Protection Areas and Ramsar sites
- HD2 - Affordable Housing
- HD9 - Empty residential Property
- T9 - Parking Standards
- CC2 - Reducing Carbon Emissions from new Development
- CC11 - Sustainable Drainage Systems
- CC12 - Water Quality
- CC13 - Water Resources
- DBE1 - Sustainable Design and Construction
- DBE3 - Principles of Design
- DBE4 - Residential Space Standards
- DBE5 - Inclusive Design
- HE1 - Conservation of Heritage Assets
- HE4 - Development Affecting Setting of Listed Buildings
- HE6 - Conservation Areas
- HE8 - Heritage Assets in Conservation Areas
- TCL1 - Town Centres
- LB9 - Protection, Mitigation, Enhancement and Increased Connectivity for species and Habitats of Principal Importance
- OS11 - Outdoor Space Provision
- OS12 - Green Infrastructure
- QL8 - Health and Social Care Facilities

*Herne Bay Area Action Plan (2010)*

- HB7 - Conservation Area Design
- HB8 - Public Realm Improvements

# Planning Considerations

## **Previous Reasons for Refusal**

25. A previous scheme (CA/16/02945) for the demolition of the nursing home and provision of a building providing 14 units was refused and dismissed at appeal. The scheme proposed here is largely the same.

26. The reasons for refusal are included below for reference;

- 1. As a result of the bulk, mass, scale and design of the proposed building and due to the loss of the existing building which makes a positive contribution to the character and appearance of the conservation area as a result of its historical significance, the proposed development would be harmful to the character and appearance of the conservation area, contrary to the aims and objectives of the National Planning Policy Framework; policies BE1, BE7, & BE8 of the Canterbury District Local Plan 2006 and policies DBE3, HE6, & HE8 of the Canterbury District Local Plan 2014 publication draft.*
- 2. Insufficient information has been provided to justify the loss of the use of the site for a community facility, contrary to policy C13 of the Canterbury District Local Plan (2006) and policy QL6 of the Canterbury District Local Plan 2014 publication draft.*
- 3. The applicant has failed to secure the delivery of necessary measures to mitigate the impacts of the proposed development on The Thanet Coast and Sandwich Bay SPA and the Thames, Medway & Swale Estuaries SPA. Without such mitigation measures it would be contrary to the provisions of the Habitat Regulations and Directive to grant consent for development which, on the advice of Natural England, would affect the integrity of a European site. The proposal is therefore in conflict with paragraphs 17, 109, 114 and 118 of the National Planning Policy Framework, policies BE1 and NE1 of the Canterbury District Local Plan 2006 and policies SP1, SP7, LB5 and LB9 of the Canterbury District Local Plan Publication Draft 2014.*
- 4. The applicant has failed to secure contributions necessary to mitigate the impact of the development in relation to community infrastructure, contrary to the aims and*

*objectives of the National Planning Policy Framework, policies BE1, IMP2 of the adopted Canterbury District Local Plan 2006, policies QL5 of the emerging Canterbury District Local Plan Publication Draft 2014 and the Council's adopted 'Development Contributions' SPD.*

27. Please note that reasons 2, 3 and 4 were found to be resolved by the inspector as part of the dismissed appeal. Information regarding how reasons 2, 3 and 4 will remain resolved as part of this application is included within the body of this report.
28. The body of the report below discusses reason 1 of the previous refusal - impact on the character and appearance of the Conservation Area.

### **Loss of the Nursing Home/HMO and the Principle of Residential Development**

29. The loss of the care home and the principle of residential development on the site has been previously accepted as part of a previous application CA/17/01632 and CA/20/00140. As such the proposed use is considered to be acceptable and complies with policies TCL1 & HD9 of the local plan and provides new homes in accordance with paragraph 11 of the NPPF.

### **Design and impact on the Conservation Area and Surrounding Heritage Assets**

#### Existing building and its loss

30. The loss of the existing building has been previously agreed as part of the extant permission on the site for 12 units. It was also accepted as part of the dismissed appeal subject to the site at 21 coming forward for development. The extant permission at 21 has now been implemented, this was confirmed as part of the CA/20/00140 application.
31. This application presents the opportunity to create an appropriate building which will significantly enhance the townscape and visual amenity of the local area by providing a well designed development which will be seen with 21 next door whilst removing a poor quality building that is in a state of disrepair. This state of disrepair and negative effect on the appearance of the Conservation Area has been acknowledged by the Council as a s215 notice has been issued.

#### Consideration of new building

32. Within the appeal report the inspector notes that the subject building makes a positive contribution to the Conservation Area, partly because of its unity with other buildings in the Street. As a result, the Inspector gave weight to the extant permission for the adjacent site 21 St George's Terrace noting that without guarantee that the scheme for 21 will be built the appeal scheme would look unbalanced.

33. A strong emphasis was given to the uncertainty of the neighbouring schemes implementation. Since this time the permission for the replacement at 21 has been implemented. This was confirmed as part of the application on this site for 12 units.
34. The previous reason for refusal no longer exists as the two sites can be built out, permission should therefore be granted. However for completeness, commentary on the proposed design has been included below.

Design of the new building

35. Local planning policy DBE3 requires new developments to be of high quality sustainable and inclusive design which reinforces and positively contributes to its local context.
36. The site is located within a varied row of terraced and semi detached properties. The proposed development will provide 14 high quality apartments within a considered form that makes the most effective and efficient use of land by opening up the rear of the site to provide improved natural light and outlook for the application site and the neighbouring properties. The proposal respects the amenities of the neighbouring properties, all whilst providing 14 flats within a form that is in keeping with the character and appearance of the surrounding area.
37. ARB and RIBA Chartered Architects from Urban and Rural have undertaken extensive work to ensure the schemes elevational treatment, form and materials are of a high quality and celebrate the varied townscape, character and history of Herne Bay and Herne Bay Conservation Area. The proposed building has been specifically designed to pay homage to the existing building by fronting onto the street and drawing on the gable frontages of the existing building and the character of the surrounding area. It provides an attractive active street frontage that would appropriately reflect the significant variations in scale and appearance between the buildings to the east and west of the site and maintains a suitable front boundary treatment between the site and the highway. A detailed breakdown of the design rationale and proposed materials are included within the accompanying Design and Access Statement.
38. The design does represent an increase in ridge height over the existing building and the extant permission for 12 units but does not break the surrounding skyline. It is also significantly lower than the extant permission at 21 St George's Terrace next door.
39. The site is not directly adjacent to existing greenspace so there is no feasible opportunity to improve green links as part of the proposal, however the removal of the existing extension at the rear will open up the site providing an improvement to the urban landscape in line with policy OC12.

40. The proposed scheme has been carefully designed to enhance the character and appearance of the Conservation Area, respecting the surrounding building line, massing, height and appearance of the buildings whilst providing something new that is in keeping with the varied character of the Conservation Area and provides a sustainable and well designed addition to the area.
41. The proposed high-quality architecture and materials together with the much needed regeneration of the area, all weigh in support of the scheme. The proposal is considered a testament to good design and architectural quality in accordance with local planning policy DBE3, DBE4 and DBE5 and Herne Bay Action Area Policy HB8.
42. The regency property to the east of the development site is a listed building, and is separated from the site by a 1960s house which has an extant permission for demolition and redevelopment to provide a modern pitched roof 4 storey building.
43. The application site is not directly adjacent to the listed building and proposes a modern building that has been designed to be in keeping with the varied character and appearance of the surrounding Conservation Area. It is not considered to have a negative effect on the setting of the listed building. The proposal is considered to comply with Policy HE1, HE4, HE6 and HE8.

**Standard of Internal Accommodation**

44. The Technical Housing Standards - Nationally Described Space Standards (2015) require internal spaces to be designed in such a way to provide attractive and functional spaces for future residents. This principle is echoed in local planning policy DBE4, which requires applicants to demonstrate that the proposed accommodation provides future occupants with a high quality of life.
45. Each of the flats has been laid out to provide functional and accessible living space for all future residents. The proposed development meets, and in some cases exceeds, the prescribed Nationally Described Space Standards (2015) technical housing internal space standards. For the officer's ease of reference, the relevant internal standards have been considered individually below.

Unit	Bedrooms/Persons	Minimum GIA (SQM)	Proposed GIA (SQM)	Pass?
1	2B/3P	61sqm	62sqm	✓
2	2B/3P		71sqm	✓
3	2B/4P	70sqm	77sqm	✓
4	1B/1P	39sqm	48sqm	✓
5	1B/2P	50sqm	61sqm	✓

6	3B/5P	86sqm	91sqm	✓
7	2B/3P	61sqm	72sqm	✓
8	2B/4P	70sqm	82sqm	✓
9	3B/5P	86sqm	92sqm	✓
10	1B/1P	39sqm	43sqm	✓
11	1B/1P		45sqm	✓
12	3B/4P	74sqm	98sqm	✓
13	2B/4P	70sqm	100sqm	✓
14	2B/4P	70sqm	90sqm	✓

46. The proposed scheme demonstrates that 14 units that are compliant with the nationally described space standards can be provided within the proposed form. Consequently, it is considered that the proposal would provide a high-quality standard of accommodation in accordance with policy DBE4 of the local plan.

**Standard of Outdoor Amenity**

47. Due to site constraints, the proposed development cannot physically provide outdoor amenity space for the proposed flats due to its town centre location. However, the proposed development is within close proximity of Memorial Park (public park) (distance of 600m) a large open public recreational space and 100m from Herne Bay beach. This public space would provide ample outdoor activity space for future residents.

48. In the extant planning permission ref: CA/20/00140, no amenity space was provided for the majority of the apartments, it was accepted by the officer that the scheme as a whole provided acceptable living standards for future occupiers in terms of internal and external space provision as assessed against current planning policy.

49. Whilst there is no formal external amenity space provided on site. The provision of easily accessible high quality public external amenity space is considered to be acceptable. This approach is acceptable under policy and has been previously agreed as part of the extant permission CA/20/00140. It is considered that the proposal remains acceptable and complies with policy DBE4 and OS11.

**Impact on Neighbouring Amenity, Daylight and Sunlight**

50. The proposed development has been designed to demonstrate that a scheme for the provision of 14 units on the site does not materially harm the amenities of existing

neighbouring residents; particularly with reference to overlooking, overshadowing or an unacceptable sense of enclosure.

51. The proposed scheme reduces the overall built footprint of the existing site by pulling the built mass circa 9m into the site from the rear in order to improve the provision of outlook and daylight provision to the host property and to other properties in the vicinity. The proposed building is situated between the existing built form and does not project forward of the existing building line formed by the southern properties of St George's Terrace.
52. The submitted plans and the supporting Design and Access Statement include the location of neighbouring windows and show a 45 degree line from the rear windows of the neighbouring properties demonstrating the lack of overlooking between adjacent buildings.
53. The proposed scheme will provide high levels of natural light to all habitable rooms via openable windows and rooflights. The impact of the proposal on the amenity of neighbouring properties is similar to that of CA/20/00140 which has been previously agreed as part of the extant permission. It is considered that the proposal remains acceptable and complies with policy DBE4 and OS11.

### **Highways, Parking and Servicing**

#### Car Parking

54. Local planning policy T9 states that car parking requirements will be assessed against the parking standards set out in the Local Plan Appendix 4.
55. The appendix includes a car parking standard for 1 and 2 bed flats, however there are no specific requirements noted for 3 bed flats. For the purpose of this application the standard for 3 bed houses has been utilised.
56. Appendix 4 of the local plan notes that a maximum of 1 parking space per unit is required in a town centre for 1 & 2 bed flats and for 3 bed houses. This results in a maximum of 14 parking spaces as there are 14 residential units proposed.
57. There are 10 parking spaces provided on site as part of the application which is within the 14 space maximum for the site. The scheme is therefore compliant with Policy T9 and appendix 4 of the Local Plan.

#### Cycle Parking

58. Appendix 4 of the local plan requires 1 parking space per flat as part of new developments. It is noted that the cycle parking should be provided as a secure covered communal facility if a suitable individual alternative is not available.
59. Space for 14 secure covered cycle parking spaces has been provided as part of the development proposals.

#### Highways

60. Access to the site remains as existing with access provided at the front of the building from St Georges Terrace. A private driveway to access the rear parking area is located at the west of the site serving 8 car parking spaces. A further 2 car parking spaces are located to the front of the building which are accessed directly from St Georges Terrace.
61. Given the site's sustainable location within Herne Bay town centre and the prior existence of these access points, the provision of 10 car parking spaces is not considered to have a negative effect on highways.

#### **Refuse and Recycling**

62. Suitable secure bin storage is to be provided discreetly at the rear of the site within the proposed development in the location shown on the submitted planning drawings, providing all flats with access to refuse, recycling and food waste storage. Suitable space has also been provided on site at the front of the property to provide a temporary bin storage area that can be utilised and bins then placed by St George's Terrace for bin collection. This is in line with the previously approved scheme for 12 residential units therefore complying with Policy DBE4.

#### **Ecology**

63. As noted previously, the site is located within the Thanet Coast and Sandwich Bay 7.2km Zone of Influence. The proposal is for residential development of a site previously used for residential use, the works proposed are not considered to have a negative impact on the existing ecology of the site or the surrounding area.
64. However, it is recognised that there is a need to prevent an increase in a recreational disturbance on the over-wintering bird populations noted in policy SP6 and that there is a need noted by policy to contribute towards a Strategic Access Management and Monitoring Strategy (SAMMs). This was previously dealt with via an agreed unilateral undertaking as part of the previous application for 12 units.
65. It is requested that the requirement for this development is dealt with in the same manner in order to satisfy SP1, SP6, LB5 and LB9 of the local plan.



66. The required SAMMs contribution has been calculated as per the table below inline with the CIL and planning obligations webpage on [canterbury.gov.uk](http://canterbury.gov.uk) as a means of mitigating the impact of recreational pressure at the Thanet Coast and Sandwich Bay SPA.

Unit size	Number	Tariff	Subtotal
1 bedroom flat	4	£355.00	£1,420.00
2 bedroom flat	7	£498.00	£3,486.00
3 bedroom flat	3	£670.00	£2,010.00
Total			£6,916.00

67. The applicant is willing to undertake a Unilateral Undertaking under Section 106 of the Town and Country Planning Act 1990 subject to contracts.

### **Sustainability and Drainage**

68. Policy DBE1, CC2, CC11, CC12 and CC13 require that the development scheme demonstrates that proportionate measures to reduce carbon and greenhouse gas emission have been incorporated as well as demonstrating that the building has been designed to reduce carbon emission, provide suitable drainage and sustainable drainage systems and ensure that water quality does not deteriorate. Page 14 of the supporting Design and Access Statement, 'sustainability' includes a breakdown of how the scheme has been designed to include a proportionate level of measures to reduce carbon and gas emissions and provide suitable drainage and sustainable urban drainage systems on site.

### **Stodmarsh**

69. Natural England have issued a formal advice note which identifies that water quality in the Stodmarsh has deteriorated and that this may be linked to the discharge of wastewater from new homes into the waste water treatment works in the area.

70. It has been previously accepted as part of CA/20/00140 that the provision of residential development on the site is acceptable with regard to Stodmarsh as has the methodology used by Considine. A report from Considine confirms that the existing care home use with 22 beds would create 7,700 litres of foul water per day. It also confirms that residential units produce 150 litres per person per day. The projected foul water per day from the 14 units based on 2.4 people per unit is therefore 5,040 litres per day.

71. This is significantly below the existing level. It is also of note that, on this basis, a development of up to 21 dwellings would be classed as nutrient neutral using Flows and Loads data for the new units. A copy of the Stodmarsh report is included in Appendix B.
72. As such it is demonstrated that there are no potential significant effects on the integrity of the Stodmarsh and the proposal is considered to comply with policies LB5 and LB6 of the Local Plan.

### **Development Contributions**

#### Affordable housing

73. Policy HD2 - Affordable housing seeks the provision of 30% affordable housing on residential accommodation of 11 units or more.
74. A viability study has been completed to assess the viability of providing affordable housing on the site. In this instance the provision of affordable housing on the site is not considered to be viable and is therefore not proposed as part of this scheme. A copy of the viability report is included in Appendix A of this document. The approach and methodology used, has previously been approved by Redloft, an independent viability consultant. This principle was accepted as part of the previous application CA/20/00140. No affordable housing is proposed as part of this application.
75. The application is for 11+ units, it does not attract any CIL contributions. This has been previously confirmed as part of the application for 12 units (CA/20/00140).

# Planning Balance

76. This planning statement has been prepared to set out the planning justification in support of the proposed redevelopment of the 22 and 23 St George's to deliver 14 X residential flats.
77. The proposal will enhance the appearance of the site, improve the visual appearance of the Conservation Area, while sitting comfortably within the context of local built form, without detriment to local residential amenity.
78. The development will also make efficient use of this underutilised previously developed site, contributing to housing delivery. The proposal optimises the opportunity to provide housing at an appropriate density in response to the site's location and characteristics. Overall, the proposed development is considered to be acceptable with regard to relevant development plan policy and national planning policy.
79. It has been demonstrated in this statement that there are no detrimental impacts that would impact upon environmental sustainability and as such there are no site-specific matters that would outweigh the benefits of the proposed scheme. Therefore, in accordance with the NPPF, and the adopted development plan policies it is requested that planning permission is granted.

# Appendices

## Appendix A - Financial Viability Report

# Appendix B - Considine Stodmarsh Report