



PLANNING AND HERITAGE STATEMENT

**ERECTION OF TWO STOREY ROOF EXTENSION TO
PROVIDE 20 ADDITIONAL APARTMENTS**

AT

IRWELL CHAMBERS, UNION STREET, LIVERPOOL

SUBMITTED ON BEHALF OF

RDI PROPERTY LTD



Date: July 2016

Ref: 16.090

CONTENTS

1.	Introduction	Page 3
2.	Site and Surroundings	Page 4
3.	Development Proposals	Page 5
4.	Planning Policy Context	Page 6
5.	Assessment of Heritage Asset	Page 14
6.	Background and Pre-application Discussions	Page 17
7.	Heads of Terms	Page 19
8.	Assessment of Proposal	Page 21
9.	Conclusion	Page 26

1. Introduction

- 1.1 Cerda Planning has been instructed to prepare a Planning and Heritage Statement to support a planning application for a two storey roof extension at Irwell Chambers, Union Street, Liverpool.
- 1.2 The development is for the erection of a two storey roof extension to provide 20 new apartments.
- 1.3 This statement sets out relevant planning policy in relation to residential development and full justification is given for the rational which should be read in conjunction with other documents submitted with the application.
- 1.4 Having assessed the proposal against current Local and National Planning Policies, conclusions are drawn which indicate that the residential development accords with National and Local Planning Policy and would not result in harm to the character and appearance of the local area and the World Heritage Site.
- 1.5 This statement should be read in conjunction with the submitted plans which together comprise of the planning submission.

2. Site and Surroundings

- 2.1 The application site comprises Irwell Chambers located within Liverpool City Centre.
- 2.2 The building comprises of a four storey building located on the edge of the Castle Street Conservation Area. The application building is located within the Castle Street/Dale Street/Old Hoare Street area of the Liverpool Maritime Mercantile City World Heritage Site.
- 2.3 The building comprises a red brick and stone building with a shallow gable roof and a number of chimneys. The form of the building follows a broad 'U' shape with a frontage onto Fazakerley Street and Union Street wraps around Custom House (which is not within the applicant's ownership). The internal court yard area provides amenity space for the existing residential units and includes circulation spaces provided by means of external walkways and a lift. The central courtyard is glazed over.
- 2.4 The surrounding area provides a mix of historic and large scale modern developments and is located within approximately 650 metres of Liverpool One Shopping Centre. Princess Dock is located to the west beyond New Quay.

3. Development Proposals

- 3.1 The development is for the erection of a two storey roof extension to provide 20 residential apartments.
- 3.2 The apartments will be directly accessed from the existing central stairwell and lift already serving the upper floors of the application building. The layout of the apartments will follow the form of the existing layout of the building.
- 3.3 The apartments will range in size from 55sq.m for a 1 bedroom apartment to 200sq.m for the duplex apartments.
- 3.4 The development will comprise of the following mix:
- 6 x 1 bedroom apartments
 - 12 x 2 bedroom apartments
 - 2 x 3/4 bedroom duplex apartments
- 3.5 Externally the roof extension is to be clad in modern grey cladding with grey slate tiles with lead flashings to the cheeks of the dormers.
- 3.6 The central circulation space is to be fully glazed with an element of curtain walling extending upwards and sitting behind Custom House.
- 3.7 The two storey roof extension is to be set back 1.2m from the existing parapet to appear as a subservient addition to the building.
- 3.8 Due to the built up nature of the site no on site car parking spaces are proposed.

4. Planning Policy

4.1 The National Planning Policy Framework (NPPF) was adopted in March 2012.

4.2 At the heart of the framework is the need to achieve sustainable development, Paragraph 7 makes clear that there are three dimensions to sustainable development:

- Economic – contributing to building a strong responsive and competitive economy by ensuring a sufficient supply of land is available at the right time;
- Social – supporting strong, vibrant and healthy communities by providing the supply of housing to meet the needs of existing and future generations and;
- Environmental – contributing to protecting and enhancing the natural, built and historic environment.

4.3 Paragraph 14 advises that a presumption in favour of sustainable development is the golden rule running through the plan making and decision making process. Development that accords with the Development Plan should be approved without delay but where the Development Plan is absent, silent or out of date grant planning permission unless the adverse impact of doing so would significantly or demonstrably outweigh the benefits when assessed against the Framework as a whole.

4.4 In relation to plans adopted prior to 2004 the framework at Paragraph 215 states that due weight should be given to existing policies in terms of the degree of consistency with the Framework.

4.5 Underpinning both plan making and decision taking is a series of 12 core planning principles. These are set in Paragraph 17.

4.6 The relevant core principles include (*inter alia*);

- Planning not simply being about scrutiny but instead a creative exercise in finding ways to improve places in which people live their lives;

- Every effort should be made to objectively identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities and growth;
- Always seek to secure high quality design and a good standard of amenity for all existing and future occupiers of land and buildings;
- Encourage the effective use of land by re-using land that has been previously developed (brownfield land) provided it is not of high environmental value;
- Conserve heritage assets in a manner that is appropriate to their significance so that they can continue to be enjoyed by future generations and contribute to their quality of life.

4.7 In seeking to build a strong and competitive economy the Framework at Paragraph 19 states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. The planning system should encourage and not act as an impediment to sustainable growth. The construction and provision of new homes should be seen as integral to the country's economic growth.

4.8 Paragraph 47 of the framework requires the supply of housing to be significantly boosted. This includes providing sufficient sites for 5 years' worth of housing against the Council's requirements. The framework requires that local authorities should deliver a wide choice of homes and wider opportunities for home ownership whilst creating sustainable, highly inclusive and mixed communities.

4.9 It reads on to require authorities to identify the size, type and tenure and range of housing that is required, in particular locations and where authorities identify the need for affordable housing they should set policies for meeting this on site unless off-site provision or a financial contribution can be justified.

4.10 The Government's thrust is to significantly boost the supply of housing and advises that housing applications should be considered in the context of a presumption in favour of sustainable development.

- 4.11 Paragraph 56 of the framework advises that the Government attaches great importance to the built environment and development should contribute positively to making places better for people.
- 4.12 Paragraph 58 states that proposals should aim to:
- Ensure that development adds to the overall quality of an area;
 - Establishes a strong sense of place;
 - Optimises the potential of the site to accommodate development and responds to local character and history;
 - Create a safe and accessible environment that is visually attractive as a result of good architecture and appropriate landscaping.
- 4.13 The protection of proposed and existing properties from flooding is a continued policy of the framework. It states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.
- 4.14 With regard to sustainable travel and transport the framework advises that only where developments generate significant amounts of movement should they be supported by appropriate statements; rather decisions should take into account the opportunities for sustainable transport modes and that suitable access to a site can be gained by all people.
- 4.15 It goes on to advise at Paragraph 32 that development should only be prevented or refused on transport grounds where the residential cumulative impact of the development are severe.
- 4.16 In relation to the historic environment local planning authorities should assess the significance of any heritage asset (and its setting) that may be affected by development.
- 4.17 Paragraph 126 states that the relevant authority should ensure that new development makes a positive contribution to local character and distinctiveness whilst conserving it in a manner appropriate to their significance.
- 4.18 The Framework states that only where a development will lead to a substantial harm or to the complete loss of significance of the heritage asset

should local planning authorities refuse consent. Where development will lead to less than substantial harm, this harm should be weighed against the wider benefits of the development.

4.19 In relation to developments within Conservation Areas and World Heritage Sites the Framework encourages developments which enhance or better reveal the significance of the heritage asset. The Framework goes on to acknowledge that not all areas of a Conservation Area or World Heritage Site necessarily contribute to significance and therefore the local authority should take this into consideration when assessing whether a development will result in substantial harm or less than substantial harm and weigh this against the contribution the development makes to the significance of the Conservation Area or World Heritage Site as a whole.

4.20 The National Planning Practice Guidance accompanies the NPPF and offers further guidance on certain aspects of the framework. In relation to design the guidance sets out that the successful integration of all forms of new development with their surrounding context is an important design objective. Local building forms and details contribute to the distinctive qualities of a place. These can be successfully interpreted in new development without necessarily restricting the scope of the designer. Designs should ensure that new and existing buildings relate well to each other, streets are connected and spaces complement one another.

4.21 The Guidance goes on to state that standard solutions rarely create a distinct identity or make best use of a particular site. The use of local materials, building methods and details can be an important factor in enhancing local distinctiveness when used to evolve local design. Innovative design should not be discouraged.

The Development Plan

4.22 The plan for Liverpool is the **Liverpool Unitary Development Plan** (2002) which contains saved policies focusing on development and the use of land within the City.

4.23 The strategic objectives of the plan are to stem economic decline, improve the appearance of residential, industrial and public areas and reduce inequality.

- 4.24 Chapter 9 of the Local Plan sets out the Council's vision towards housing in the City. Policy H3 encourages the development of residential units within the City Centre provided the character of the area in question is not harmed and adequate residential amenity is provided.
- 4.25 The full and part conversion of existing buildings and the development of new housing in primary residential and mixed use areas will be encouraged.
- 4.26 The Local Plan recognises that there is a social and economic benefit to City Centre living as it assists in urban regeneration, increases housing provision, combats de-population of an area and utilises the existing surrounding infrastructure.
- 4.27 Policy H5 sets that new housing developments will be supported provided that there is adverse impact on the living conditions of existing and proposed residents, the character of the residential area and the development does not result in significant traffic generation or car parking.
- 4.28 Policy H5 goes further to state that the density, design and layout should respect the character of the surrounding area and should maintain privacy and amenity for existing future residents.
- 4.29 Convenient and nuisance free facilities for pedestrians and cyclists will be expected to comply with design provisions set out elsewhere in the Plan.
- 4.30 In relation to the historic environment Policy HD8 sets out that the Council will take a positive approach towards the preservation and enhancement of Conservation Areas. This to be achieved by supporting the repair of buildings, preparing action plans, securing the removal of features which detract from the character of areas and providing planning guidance to owners and developers.
- 4.31 Policy HD18 is a general design policy which will apply to all forms of development to ensure high quality design. Proposals should ensure the (*inter alia*) following:
- The scale, density and form of the proposal relates well to its local surroundings;
 - Development includes a distinct design layout;

- The development has regard to and does not detract from the City Skyline roof scape or local views within the City;
- The development does not prejudice the re-development of adjoining sites;
- There is no loss of amenity or privacy for adjacent residents;
- Arrangements are made for storage and collection of refuse;
- Adequate arrangements are made for pedestrian and vehicle access and parking.

Supplementary Planning Documents

- 4.32 The **Design for Access for All SPD** advocates the concept of inclusive design for everyone irrespective of mobility and ability and sets out design principles for access, corridors, public facilities, surface treatment and car parking.
- 4.33 The application site is located within the Liverpool Maritime Mercantile City World Heritage Site and subject to the **World Heritage Site SPD**.
- 4.34 The document sets out developments that are sensitive to the character and universal value of the World Heritage Site will be supported. The document encourages quality architecture and design.
- 4.35 The aim of the SPD is to protect the outstanding universal value of the World Heritage Site and its buffer zone to conserve the areas outstanding universal value to the international community.
- 4.36 Through the implementation of the SPD the Council wishes to ensure that new development enhances and protects the values of the World Heritage Site. The setting of the World Heritage Site is to be adequately protected and new development should respect its visual and historic context whilst encouraging economic re-generation through the conversion of historic buildings to stimulate the economy and enhance the profile and image of the City.
- 4.37 The SPD sets out that within the buffer zone the principle of new development and the conservation of significant and historic buildings is encouraged in order to improve the landscape and contribute to the social and economic life of the City. However, it is acknowledged that these must be balanced against the character setting and value of the World Heritage Site.

- 4.38 In accordance with Policy HD18 all developments within the World Heritage Site will need to respond to and respect the surrounding character including proposing a suitable scale and mass that does not significantly exceed the scale of surrounding block buildings or significantly impact on key views or views of key buildings that contribute to the character of the area.
- 4.39 Large blocks of buildings in and around the application site comprising of the West Tower, the Unity Building, St Nicholas Church and the Town Hall are located to the west and south. The policy sets out the importance of new development respecting views to, from and within the World Heritage Site. It is expected that new developments will not have a significant adverse impact on these key views by all obstructing public views of long landscape buildings.
- 4.40 In relation to building heights the SPD recognises that there is no uniformity to building heights within the area and buildings display varying degrees of heights between areas. Whilst the SPD does not prescribe any maximum heights to buildings it does recommend that new development should reflect local character in terms of building heights and should not exceed the tallest building within the immediate vicinity of the streets they address.
- 4.41 In relation to roof extensions the SPD sets out that these will be permitted provided that there would be no significant loss to the buildings historic fabric; the development would not dominate the main façade of the building; not be visually intrusive along the street scene; not have an impact on the character of the townscape and be in keeping with window pattern, string course and parapet alignment along the street.
- 4.42 The application site is located within the character area set out in the SPD which is known and referred to as Castle Street/Dale Street/Old Hoare Street commercial district which signifies the historic commercial Civic Centre of the City. The area during the 18th and 19th Centuries was characterised by civic commercial and financial institutions accommodated in buildings designed by many of Britain's greatest architects of their age. The document acknowledges that many of the buildings around the edges of the character area are of high quality and contribute to the historic character of the City Centre.
- 4.43 Design guidance set out in the SPD encourages a high quality design

complementary to the existing historic environment. These should respond to local characteristics and should not dominate nearby historic buildings in terms of scale. Traditional and historic materials such as red brick, stone cladding, slate roofs and glazed tiles are a strong element of the pallet of materials within the area which should be reflected in the design of new proposals.

5. Assessment of Heritage Asset

- 5.1 The NPPF advises that local authorities should receive from an applicant a description of the significance of a particular heritage asset – with the level of detail proportionate to the assets importance, stressing that it should be no more than is sufficient to understand the potential impact of the proposal on the significance.
- 5.2 The Liverpool Maritime Mercantile City World Heritage Site is considered by the World Heritage Committee to have outstanding universal value because of the role that Liverpool played in the development of dock construction, port management and international trading in the 18th and 19th century. The buildings and construction of the port in the City are an exceptional testament to the Mercantile culture.
- 5.3 Liverpool in addition played an important role in influencing global demographic changes during that period through the transatlantic slave trade and as a port of mass European immigration to the New World. The surrounding structures sited along the River Mersey forming part the docks signify the historical importance of the City of Liverpool.
- 5.4 The application site is located within the historic commercial and civic centre of the city and was characterised by commercial and financial institutions accommodated in buildings designed by many of Britain's greatest architects of their age.
- 5.5 Dating back to the 1850s it appears that the historical form of the surrounding road layout has changed little with the most significant change the cutting King Edwards Street towards the start of 20th century.



Figure 1 - Union Street in 1890

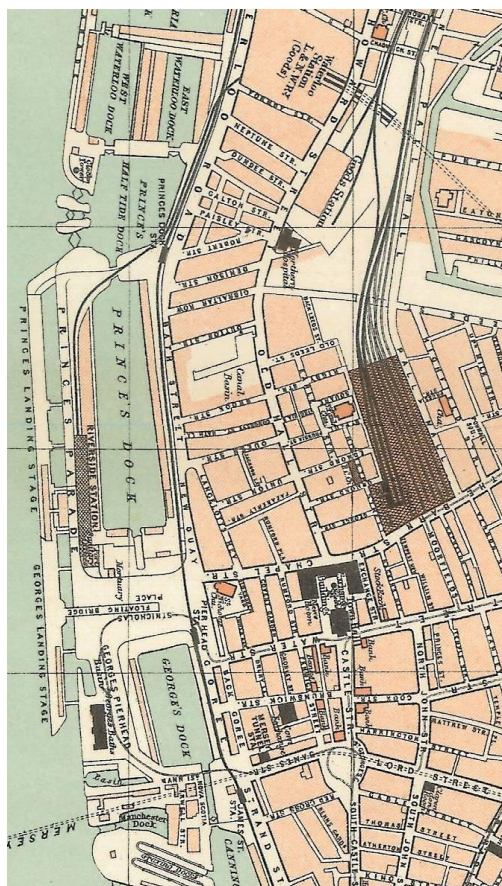


Figure 2 – Union Street in 1898

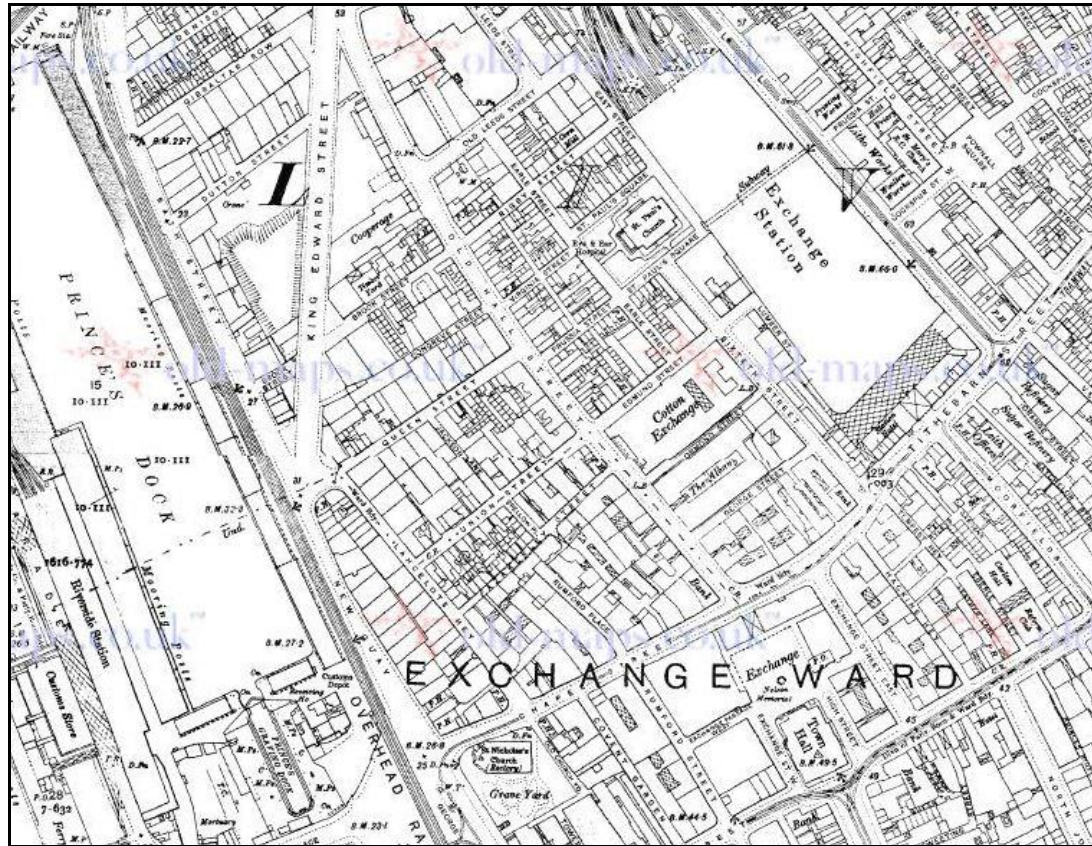
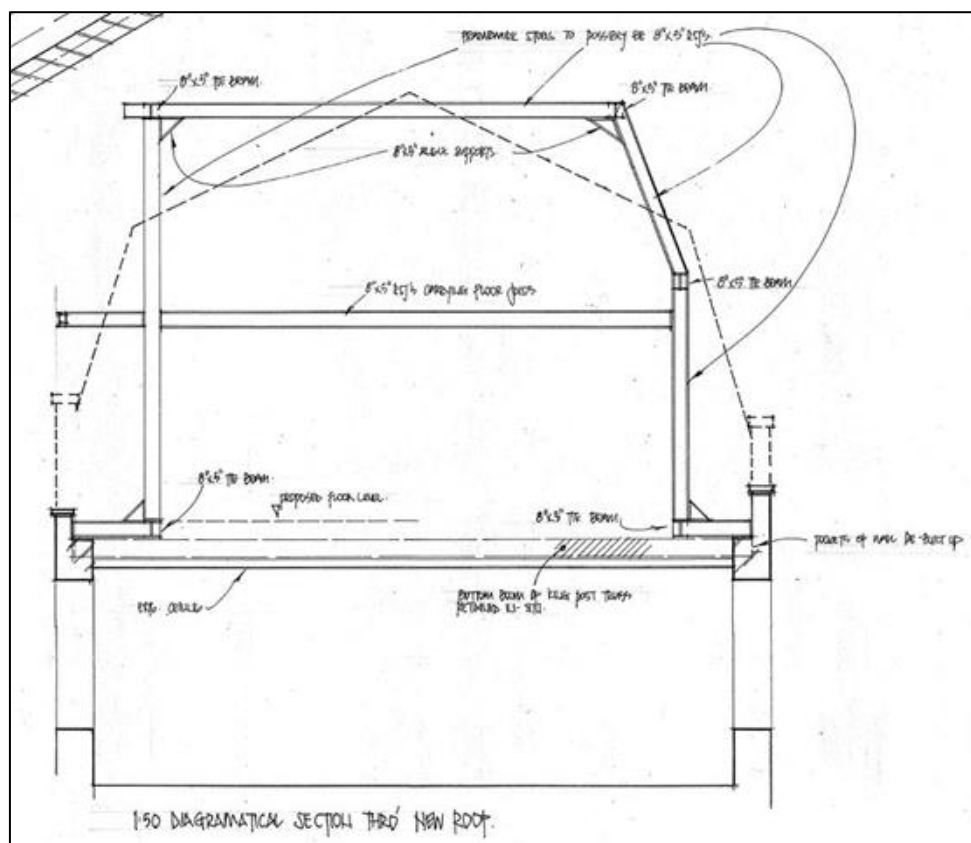


Figure 3 – Union Street in 1908

6. Background and Pre-application Discussions

- 6.1 The planning application submitted in detailed form has been subject to pre-application discussions with Officers at the Council prior to submission.
- 6.2 A pre-application enquiry for a three storey roof extension (under reference 0254/16) was submitted to the Council and a meeting was held on site including a walk through the building with the Planning Officer and the Conservation Officer.
- 6.3 During the course of the meeting it was agreed that a three storey roof storey would be excessive in terms of scale and form and in principle a two storey roof extension would be acceptable depending on the overall scale and external appearance of the extension.
- 6.4 The Conservation Officer suggested a double pitch roof to reduce the overall mass of the roof. This has been subsequently considered and explored however this arrangement is more difficult to construct and internally does not provide sufficient usable space for occupiers. This is illustrated on the sketch below with the hatched line following approach suggested by the Council.



- 6.5 Whilst the double pitch roof has not been adopted as part of the proposals the overall appearance of the roof extension and its mass has been a key consideration during the evolution of the design leading to planning application stage.
- 6.6 The roof extension is set back from the existing parapet and the overall height of the roof extension has been kept to a minimum.
- 6.7 In relation to the external finish of the roof extension the development proposals include traditional materials, as suggested by the Conservation Officer, such as grey slate tiles and lead flashings.

7. Heads of Terms

- 7.1 In accordance with advice contained in the National Planning Practice Notes (which has replaced that set previously out in Circular 05/2005) the applicant anticipates entering into a Section 106 Agreement with Liverpool City Council in respect of a number of provisions.
- 7.2 In preparing the Heads of Terms regard has been given to policies contained within the Liverpool Local Plan and the Section 106 Planning Obligations Planning Advice Note.
- 7.3 In accordance with the Planning Advice Note the applicant recognises the following contributions may be required:
- £2,000 per dwelling towards new or enhanced open space/public realm improvements
 - £16,000 towards the cost of the provision and planting of street trees
 - 15% of the value of the planning application fee to fund the provision of public art within the City Centre
 - £500 towards the cost of updating the City Centre Model
- 7.4 Planning Obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 and as policy tests within the National Planning Policy Framework. There will be an upper limit to the amount that the development can contribute if it is to remain viable. This will be determined with the local planning authority during the determination period and consolidated in a Section 106 Agreement.
- 7.5 Should any other matters be considered appropriate for inclusion we would be happy to discuss these with the Council as the planning application is progressed, prior to determination.
- 7.6 It is understood that the City Council are yet to adopt and introduce a Community Infrastructure Levy (CIL) and therefore is not applicable to the application.

- 7.7 In relation to monitoring fees the applicant considers that there is no lawful requirement for monitoring and administration fees in relation to the S106 Agreement. In the Oxfordshire Case (Oxfordshire County Council v Secretary of State for Communities and Local Government, Cala Management Ltd, William Roger Freeman, Ross William Freeman, Julian James Freeman, Cherwell District Council) Justice Lang stated there was no wording in the Town and Country Planning Act 1990, the Planning Act 2008, the CIL Regulations or the NPPF that suggested that authorities could claim administration and monitoring fees as part of planning obligations and therefore no statutory provisions for payment of such fees.

8. Assessment of Proposal

- 8.1 The principle determining factor in relation to any planning application is the Development Plan having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 8.2 Having set out a description of the site and its context, the proposed development, and commentary in relation to the planning policy position the remainder of this Statement sets out the case for development of the site for residential development.
- 8.3 It is considered that the main issues for consideration of the development are:
- The principle of residential development
 - Whether there are any significant or demonstrable impacts that would outweigh the benefits; and
 - The planning balance.

The Principle of Residential Development

- 8.4 The application site is located wholly within the main city centre area of Liverpool. The Local Plan encourages development of residential units within the city centre (Policy H3). The principle of development is therefore considered acceptable in light of local and national planning policy.
- 8.5 Liverpool City Centre performs exceptionally well in locational sustainability terms on its own merits. The concept of locational sustainability encompasses many elements that in the context of the application is considered to be the ability of residents to access employment, public transport, shops, health, education and leisure/ entertainment facilities and the extent to which certain facilities such as shops and public services and present locally are key sustainable attributes.
- 8.6 This is based on the assumption that better access will minimise the need to travel, contribute to city centre community life and minimise social exclusion. The application building is considered wholly appropriate in accommodating additional residential developments in the form of a high quality design roof extension.

Whether there are any Significant or Demonstrable Impacts that would Outweigh the Benefits

8.7 The development is a sustainable form of development and meets the provisions of the Local Plan and the Framework in this regard. This section is set out into subsections and considers the following:

- Character and Appearance
- Impact on the Historic Environment
- Residential Amenity
- Parking and Highways

Character and Appearance

8.8 The character of the area is mixed comprising a variety of historic and modern developments together which form the Castle Street/Dale Street/Old Hoare Street character area. These buildings which historically comprised the civic and financial institutions of the city extend eastwards and towards the south with a variety of heights, architectural treatment and forms. Significant modern residential and commercial developments extend in a westerly direction towards the docks.

8.9 The application building is four storey in height and the proposal would increase the height to 6 storey in height. It is acknowledged that surrounding blocks are characterised by buildings that range in height from four to seven storeys with a pocket of tall buildings extending westerly towards the docks which vary in height from between eight and fifteen storeys including the Unity building and the Atlantic Tower.

8.10 The proposed roof extension is sympathetic in scale, design and massing to the existing building and surrounding properties. The design of the roof extension picks up cues from the application building and the surrounding area such as traditional roof materials and would have a similar set-back from the façade of the main building as nearby properties. The roof extension is visually attractive and makes a positive contribution to the street scene, the Conservation Area and the World Heritage Site.

Impact on the Historic Environment

- 8.11 The application site is located within the World Heritage Site which is an exceptional testament to the Mercantile culture. The roof extension is visually attractive and makes a positive contribution to the surrounding area with the overall scale of the roof reflecting the character of the application building. The roof extension and the overall scale of the building does not seek to compete with the height of surrounding buildings. The recessed nature of the roof would ensure that there would be modest impact in terms of the overall increase in height of the building.
- 8.12 The increase in the overall height of the building would not affect key views across the World Heritage Site or views of nearby historic buildings in accordance with policies HD8 and HD18.

Residential Amenity

- 8.13 The layout optimises the potential of the building to accommodate development with the layout and design responding to the shape and constraints of the site.
- 8.14 The layout has been carefully considered to produce a layout and spatial relationship between the proposed residential apartments and the surrounding buildings to ensure that residential amenity in respect of privacy, outlook and daylight are appropriately safeguarded. All of the apartments benefit from natural sunlight and outlook. Overall the development provides a practical and spacious environment for future occupiers in accordance with policy H5.
- 8.15 The development would inevitably have some limited impact in terms of outlook from surrounding buildings however it cannot be considered to result in any material harm to the living conditions of nearby residents.
- 8.16 The presence of the development cannot be considered to be visually oppressive or overbearing taking into account the character of the City Centre environment.

Parking and Highways

- 8.17 The development does not provide any off street parking however it is not expected that the proposal would result in severe harm to highway and pedestrian safety in the local area which is the test set out in the NPPF.

- 8.18 The application site is sustainably located within the heart of Liverpool City Centre being within a short walk of Liverpool One Shopping centre, Liverpool Lime Street Station and employment and leisure opportunities,
- 8.19 The application site is also well served by employment opportunities, services and facilities, shops, restaurants and public houses reducing the reliance on motor vehicles.

The Planning Balance

- 8.20 In assessing the proposal it is necessary to assess any adverse impacts against the positive benefits of the development will produce in light of current, national and local planning policies.
- 8.21 It is the case that the Council have an adopted Development Plan that is time expired. Paragraph 14 of the Framework is therefore engaged and the test requires the planning balance to be made in order to come to a judgement as to whether development should be approved. The fulcrum in this assessment is firmly positioned in the positive towards the grant of planning permission.
- 8.22 The Framework sets out that there are three dimensions to sustainable development – an economic role, a social role and environmental role set out in Paragraph 7. Paragraph 8 notes that they are not to be considered in isolation. Development accords with these three dimensions in sustainability as follows:
- The development will perform an economic role by providing market housing which expands the choice and quality of housing within the City. The development will provide jobs in construction and new occupants will provide increased levels of disposal income that will in part will be spent locally supporting existing services and facilities;
 - The development performs a social role by creating a high quality environment for future residents to meet the current need of the city by providing local people with a further housing choice in order to meet the aims of maintaining a balanced a mixed City Centre residential amenity;

- The development provides an environmental role by utilising modern construction methods and ensuring the development protects the surrounding historic environment by considering the scale and design of development within the surrounding World Heritage Site.

8.23 In relation to the historic environment the Framework sets out that where the development results in less than substantial harm to a heritage asset in this case the World Heritage Site, harm should be weighed against the benefits of the development.

8.24 The benefits that will arise from the proposal will be significant. Firstly, the provision of much needed immediately deliverable market housing is a significant strand in the NPPF and is a key benefit to arise from these proposals. Numerous Inspectors on appeal have had regard to housing delivery in respect of the planning balance.

8.25 There is no significant harm identified within the Statement that would demonstrably outweigh the benefits when assessed against the policies in the Framework and the Local Plan as a whole.

8.26 The proposal must be considered in the context of the Frameworks presumption in favour of sustainable development. Consequently the clear planning balance is in favour of permitting the development proposals.

9. Conclusion

- 9.1 The National Planning Policy Framework states that all developments should be considered in the context of the presumption in favour of sustainable development. To that end all development that accords with the Development Plan should be approved without delay or where the Plan is absent, silent or relevant policies out-of-date grant planning permission unless the adverse impact of doing so would significantly and demonstrably outweigh the benefit.
- 9.2 This Statement sets out that the proposed development for 20 new apartments contained within the two storey roof extension is wholly appropriate in this location or contributes to the overall character of the local area. The development will maintain and enhance the positive characteristics of the World Heritage Site.
- 9.3 The development is consistent with the Local Plan Supplementary Planning Guidance and the NPPF providing high quality residential environment.
- 9.4 As the Statement sets out there are no overriding material planning considerations which would prevent the development being approved. Accordingly, Officers are respectfully requested to recommend this application is granted approval.