

Grounds of Appeal

26 Hillbrow Road, BR1 4JL

Prepared For
Stellar Hillbrow Ltd

LA/8953
June 2020



bell cornwell

CHARTERED TOWN PLANNERS

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1 INTRODUCTION

1.1 This statement is submitted in support of a written representations appeal on behalf of Stellar Hillbrow Ltd in respect of planning reference DC/19/112020 which was refused by Lewisham Council on 15 May 2020.

1.2 The application had the following description: The demolition of 26 Hillbrow Road BR1 and construction of one storey building and 3 two storey buildings comprising 3, one-bedroom, 1, two bedroom, 1, three bedroom self-contained flats and 1, one bedroom house, together with the provision of 2 parking spaces, cycle spaces and landscaping.

1.3 Three reasons for refusal were given, as follows:

REASON FOR REFUSAL ONE

1.4 The proposed development would fail to ensure a safe and convenient route for pedestrians to the application site that would be accessible to all users, resulting in potential conflict with vehicle manoeuvring that would significantly further exacerbate existing prejudicial conditions to highway safety on Hillbrow Road, contrary to Paragraphs 108 and 109 of The National Planning Policy Framework (2019), Policy 7.2 An Inclusive Environment of The London Plan (2016), Policy 14: Sustainable Movement & Transport of the Core Strategy (2011) and DM32: Housing design layout and space standards, DM33: Development on infill sites, backland sites, back gardens and amenity areas of the Development Management Local Plan (2014).

REASON FOR REFUSAL TWO

1.5 The proposed development would not be accessible to all users, due to a lack of step free access to any of the dwellings, contrary to Policy 3.8 Housing Choice, Policy 7.2 An Inclusive Environment and the Mayor's Housing SPG of the London Plan (2016), Policy 1: Housing provision mix and affordability of the Lewisham Core Strategy (2011) and DM32 Housing design layout and space standards of the Development Management Local Plan (2014).

REASON FOR REFUSAL THREE

1.6 The proposed first floor balcony to Unit 5 would give rise to a harmful level of overlooking into the rear garden of No.28 Hillbrow Road, contrary to Paragraph 127 of the National Planning Policy Framework (2019), Policy 15: High quality design of the Lewisham Core Strategy (2011),



and Policy DM32: Housing design layout and space standards of the Development Management Local Plan (2014).

PRE-APPLICATION ADVICE

- 1.7 From the outset, the appellant committed to taking part proactively in the pre-application advice process with Lewisham Council. This was in order to engage with Council planning and design officers at an early stage, to ensure a final design that the Council would support.
- 1.8 The pre-application process was lengthy, but positive, with detailed input being received from both the planning and design officers at the Council.
- 1.9 The first pre-application submission was submitted to Lewisham in October 2018, following the purchase of the property by the appellant in September 2018. The approach to the proposal and how this has evolved due to the pre-application discussions that have taken place with Lewisham Council is explained in full within the Design and Access Statement. (incorporating sustainability statement) prepared by Nick Willson Architects. The proposal has sought to make the best use of the site given the irregular shape and sloping plot.
- 1.10 The first pre-application was submitted to Lewisham Council in October 2018, with a proposal for the demolition of the existing unoccupied dwelling house and the construction of a part 1/2/3-storey residential building to accommodate 7 self-contained flats, comprising 3x one bedroom, 2x two bedrooms and 1x three bedroom, plus 1x one bedroom self-contained maisonette.
- 1.11 A meeting to discuss this pre-application (PRE/18/109265) was then held with the planner and design officer during December 2018, with positive and constructive feedback being received. Whilst the principle of the redevelopment of the site was welcomed and acceptable in policy terms, the officers advised that the scale and the height of the pre-application scheme should be reduced to relate better to the surrounding context.
- 1.12 The scheme was then revised and submitted to the Council in January 2019, with a further meeting held during February 2019 (PRE/19/110772). This was still a 7-unit scheme, but with overall reductions in the mass and volume of the scheme. Following some further advice from the Council some additional revisions were made to the proposal which have resulted in the current 6-unit appeal proposal.



- 1.13 We felt that the Council's planning and design officers were helpful and constructive throughout the pre-application process. Given that the advice given was fully taken on board to come up with the final design, the outcome has been particularly disappointing.

PLANNING APPLICATION PROGRESS

- 1.14 A full planning application was submitted on 24 April 2019 and validated on 16 May 2019. The case officer, Samuel James, was not the officer who was involved in the pre-application process.
- 1.15 The application progressed and on 25 July 2019, an email was received from the case officer which indicated that they were 'broadly in support of the scheme' and advising on a committee date which was likely to be in September 2019 (this was later amended to a committee date of 3 October). This email is enclosed as part of email trail 6.
- 1.16 However, in September 2019, the case officer sent an email explaining that there was now a highways objection which meant that he would be recommending that the application be refused. This highways objection set out that in principle objections, stating that the development is 'objectionable' because the access to the application site via Hillbrow Road provides a poor inaccessible pedestrian environment and the development would create conditions that are prejudicial to Highway safety. An intensification in use of Hillbrow Road by introducing additional residential units on the site would result in an increase in conflict between the different Road users of Hillbrow Road which would increase safety implications, particularly given the condition of the road and the lack of footways.
- 1.17 This issue was never raised during the pre-application process. However, in order to address the comments made by the highways officer, transport consultants Systra prepared a rebuttal to the comments which is included as one of the appeal documents. This rebuttal cross refers to elements of the Transport Statement that was submitted with the application, including the parking stress survey. As well as the availability of parking, the rebuttal included detailed representations on the issues of highway safety, pedestrian and cycle connectivity and the principle of residential development in this location.
- 1.18 Systra's rebuttal concluded that the Proposed Development is not considered to result in an adverse impact upon the local highway network or pedestrian and cycle safety. The Proposed Development is of a similar scale and nature to a number of planning applications granted



permission on Hillbrow Road, where highway safety and parking concerns have not been raised. As such, it is considered that the scale and transport impacts of the Proposed Development are satisfactory and would not result in a severe residual impact, in accordance with the NPPF.

- 1.19 There is no reference to this transport rebuttal in the officer report, however further comments from the highways officer were received on 5 November, maintaining an objection to the proposal.
- 1.20 From September 2019 to May 2020, we repeatedly attempted to engage with the Council to find a solution to the highways issue that had been raised by the Council's highways officer. As we had submitted a rebuttal to their comments, we were expected a more considered and in depth response to this rebuttal.
- 1.21 We attach a number of the email trails which confirms that there were numerous emails during this time. We also regularly phoned the Council in order to seek a resolution. Additionally, as can be seen, the clients contacted the Council themselves on a number of occasions, as did the architect.
- 1.22 Multiple times during these months, we were told that meetings with the highways officer were imminent. We therefore persevered with the application process, rather than appealing due to non-determination, as comments made by various council officers indicated that a solution was being sought. Our aim was to work proactively with the Council in order to ensure a positive outcome. The understanding was that a solution was being sought and that it was likely that an acceptable solution would be found. The Development Control Manager emailed on 28 January 2020 and stated that "The new case officer Geoff will be speaking with our Highways Team this week to confirm where we are at and if there is a proportionate s106 contribution that may address the issues. We are not there yet but I am hopeful we can progress the case." For this reason we decided to continue working with the Council rather than appealing as it was looking hopeful that a resolution could be found.
- 1.23 The new case officer was the officer who had dealt with the pre-application as the first case officer left for a 6 month sabbatical (he however returned early and resumed as the case officer for the application in April 2020). The emails between January and May show numerous emails back and forth with the Council, with attempts being made to engage with the highways



officer. Finally, after contacting the Development Control Team Leader, he responded on 11 May stating that “I appreciate this one has been with us for a significant period. The case officer, myself and the Head of Development control met about this application last week. Sam will be updating you today”.

- 1.24 The refusal was received shortly after that, with an email received from the case officer later that day stating that “After a meeting with highways and the DM team leader last week, unfortunately the council position is to refuse the application on the highways grounds. The planning harm identified is unable to be suitably mitigated by a contribution to infrastructure improvements of a scale that would meet NPPF tests of proportionality”. There was no mention at that time of any other reason for refusal apart from the highways grounds.
- 1.25 We cannot see any justification for the length of time that it took the Council to conclude this matter. If the highways objection was robust enough to use as a basis for a refusal then the application should have been refused in November 2019.
- 1.26 We have sought at every opportunity to be proactive and to work with the Council to a resolution. This delay has cost our client considerable time and money. We therefore enclose a costs claim as part of this appeal.

AMENDED INFORMATION

- 1.27 Reasons for refusal 2 and 3 were unexpected and could easily have been discussed and resolved during the application process. Given that we were given a positive indication about the application in July 2019, we would have expected the issues to have been raised at this time or in the subsequent 9 months. We could then have submitted amended plans to resolve these matters.
- 1.28 Given these circumstances, we therefore ask that the Inspectorate accepts and considers some revisions as part of the appeal process. The Council has the opportunity to comment as part of the appeal, which will hopefully lead to the withdrawal of reasons for refusal 2 and 3.
- 1.29 In summary, the revised plans are as follows: in response to reason for refusal two, we propose to install a Part M compliant access platform lift adjacent to the bin store. This will allow wheelchair access but also better access to the bin store if required.



- 1.30 Reason for refusal 3 refers to the potential of overlooking from flat 5 into the rear garden of number.28 Hillbrow Road. In response to this we propose switching the open part of the balcony to face to the rear of the site, the open side is proposed to be screened with a perforated white metal mesh screen to allow light to pass through but to prevent overlooking. This has the additional benefit of retaining the amenity provision.
- 1.31 A set of revised are enclosed as part of the appeal – as part of the appeal form.

PUBLIC COMMENTS ON THE PROPOSALS

- 1.32 We are aware of 8 public comments on the proposal which raised objections to the proposal. Whilst these are not available on the Council's website, were made available to the appellant on request.
- 1.33 The comments are also summarised within the officer report. Some of these do raise concerns regarding the surface of Hillbrow Road and parking issues. A number of the points raised are not planning points and do not correctly interpret the scheme. Other points raised have already been confirmed as acceptable through the pre-application process, or are addressed in the technical reports which accompanied the application.
- 1.34 We will address the relevant planning concerns in our response to the reasons for refusal below and do not consider that the public comments raise any additional issues which require separate comment.



2 SITE, SITE CONTEXT AND APPEAL PROPOSAL

- 2.1 The site is located in Hillbrow Road, which is an unadopted road in the London Borough of Lewisham sloping steeply down from north to south. Hillbrow Road serves a number a different properties including flats and dwellings. The surrounding area is residential with Hillbrow Road consisting of a mix of detached, semi-detached, terraced and flatted properties of a range of designs and densities. Given that the site is a redevelopment of an existing site in a residential area, there is no loss of family sized housing and a net increase in housing, the principle of development is acceptable. This is confirmed in section 9 of the delegated officer report.
- 2.2 The site is currently occupied by a 3-bed one-storey dwelling which is set back in a generous plot with a garage and parking and a rear garden plus additional planting to the front of the property. The house is accessed from Hillbrow Road via a steep driveway. As can be seen from the photograph below and from a site visit, the existing property has no architectural merit.





- 2.3 Whilst there is no prevailing style or size of dwelling in the area, the existing property is at odds with the surrounding properties which are predominantly two or three storeys. Its ridge line is significantly lower than the neighbouring properties.
- 2.4 The property was purchased by the appellant in September 2018.
- 2.5 Hillbrow Road marks the boundary of the London Borough of Lewisham's boundary, with the London Borough of Bromley on the other side of the road. Recently Hillbrow Road has experienced some changes, with permissions granted for flatted developments opposite the site. The most recent and relevant applications relate to Upfield, which is nearly directly opposite the site, and Sunset Hill, which is adjacent to the development at Upfield. These developments (granted under consents 16/04910/FUL1 and 15/02144/FULL1) are within the Borough of Bromley.
- 2.6 Despite not being within the same local authority, the developments have a very close physical relationship with the site. The image below taken from Google Maps shows the site and the surrounding area, the buildings marked with a yellow dot are the recent flatted developments referenced above. We also show some photographs below of the flatted development.



(Image 1: Google Maps, 2018)



Sunset Hill



Matilda House (formerly Upfield)

- 2.7 The site is in a sustainable location, with good access to rail and bus services and within easy walking distance of facilities and services. Further detailed information about the accessibility



of the site is set out within the Transport Statement prepared by consultants Systra and submitted with the application. This now forms an appeal document.

- 2.8 The proposal is for the demolition of the existing 3-bedroom property and the construction of a 1-2 storey series of 4 blocks within gardens, comprising 6 dual aspect residential units. The proposal will be made up of 4xone-bed, 1xtwo bed and 1xthree bed units. All of the proposed dwellings would exceed the minimum target values for the internal space standards as set out in the Nationally Described Space Standards. The officer report confirms that all of the bedrooms would exceed the minimum floorspace required and describes the units as of a good size.



3 PLANNING POLICY AND MATERIAL CONSIDERATIONS

3.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires all applications for planning permission to be determined in accordance with the development plan unless material circumstances indicate otherwise.

3.2 The relevant parts of the development plan for the Borough are as follows:

London Plan adopted March 2016 (currently under review)

Lewisham Core Strategy 2011

Development Management Local Plan 2014

3.3 Whilst a new Local Plan is being prepared, this does not appear to have been progressed since 2015.

3.4 The main material consideration is the National Planning Policy Framework (NPPF) (2019) which, together with the accompanying National Planning Practice Guidance, sets out the Government's up to date strategy and guidance for plan making and decision taking.

3.5 The relevant policies of the development plan are explained in the planning statement which accompanied the application and which has been uploaded as an appeal document. We provide a brief summary below, and return to the interpretation of the policies when we address the reasons for refusal (below).

THE LONDON PLAN

3.6 Lewisham has a current annual housing target of 1,211 dwellings. The proposed development will contribute towards meeting that target, in which is, in principle a suitable and sustainable location for development.

3.7 It is also relevant that the emerging London Plan sets out a much higher target for Lewisham, with an annual average of 2,117 dwellings to be provided over the ten year period from 2019/20 to 2028/29. The Council should therefore be making every effort to approve appropriate development proposals.



- 3.8 In terms of the reasons for refusal, the London Plan policies which are referred to are policies 3.8 and 7.2. Policy 3.8 is housing choice, which sets out that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. The policy includes a requirement for 10% of the units on a site to be wheelchair accessible.
- 3.9 Policy 7.2 sets out that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.

DEVELOPMENT PLAN FOR LEWISHAM

- 3.10 A limited number of the policies of the Core Strategy and the Development Management Policies DPD are referred to in the reasons for refusal. These are Core Strategy policies 1, 14 and 15 and DMDPD policies 32 and 33.
- 3.11 Policy 1 of the Lewisham Core Strategy sets out that all new housing is to be built to Lifetime Homes standards and 10% of all housing are to be wheelchair accessible or easily adapted for those using a wheelchair in accordance with London Plan policy.
- 3.12 Core Strategy Policy 14 promotes sustainable movement and transport, walking, cycling and public transport and adopting a restricted approach on parking to aid the promotion of sustainable transport.
- 3.13 Policy 15 of the Lewisham Core Strategy refers to High Quality Design for Lewisham including the requirement for development that 'optimises the potential of sites and is sensitive to the local context and responds to local character'.
- 3.14 Development Management Policy 32 sets out that new housing must be designed to ensure that the internal layout and external design features mean that that housing is accessible to all intended users.
- 3.15 DMDPD policy 33 sets out the principles to guide development on infill sites, backland sites, back gardens and amenity areas.



4 RESPONSE TO REASONS FOR REFUSAL

REASON FOR REFUSAL ONE

- 4.1 The proposed development would fail to ensure a safe and convenient route for pedestrians to the application site that would be accessible to all users, resulting in potential conflict with vehicle manoeuvring that would significantly further exacerbate existing prejudicial conditions to highway safety on Hillbrow Road, contrary to Paragraphs 108 and 109 of The National Planning Policy Framework (2019), Policy 7.2 An Inclusive Environment of The London Plan (2016), Policy 14: Sustainable Movement & Transport of the Core Strategy (2011) and DM32: Housing design layout and space standards, DM33: Development on infill sites, backland sites, back gardens and amenity areas of the Development Management Local Plan (2014).

RESPONSE TO REASON FOR REFUSAL ONE

- 4.2 We have set out the background to the highways objection in section 1. This explains how we proactively sought to engage with the Council to seek a solution to this issue through the application process. We sought to better understand their position, to respond to their concerns and to engage with them. Unfortunately, this proved impossible as can be seen from the email trail.
- 4.3 An appeal technical note, prepared by Systra, is attached as Appendix 1. This addresses reason for refusal one by topic and addresses these in turn, with reference both to the reason for refusal and the officer report. The elements addressed are summarised as follows:

Carriageway Surface

- 4.4 A number of streets within the vicinity of Hillbrow Road are in a similar condition (i.e. unsurfaced and with footways either not provided or only for a portion of the road). These roads all accommodate residential development in a similar manner to Hillbrow Road. It should therefore be recognised that the principle of residential units on roads that are unsurfaced and do not provide footways has been accepted. A number of new developments have been granted permission on Hillbrow Road.

Pedestrian Movement & Safety

- 4.5 The Technical Note has demonstrated that pedestrian movement is currently safely accommodated on Hillbrow Road without issue. No road collisions have been recorded on



Hillbrow Road, or at its junctions with Coniston Road and Calmont Road. Hillbrow Road is therefore suitable to accommodate pedestrian movement, including trips associated with the Proposed Development. No existing safety issues have been identified on Hillbrow Road that would be exacerbated by the Proposed Development. The road surface encourages vehicle drivers to travel at lower speeds and acts as a natural traffic calming measure.

Parking

- 4.6 Local-level car ownership data from the 2011 Census suggests that the Proposed Development will generate parking demand generated for three vehicles, with two vehicles to be accommodated on-site. On-street parking demand for one vehicle is therefore anticipated to be generated. This would increase parking occupancy levels within a 200m radius of the Site by 0.4%. Such levels of parking will not significantly impact upon pedestrian movement or safety

Public Transport Accessibility

- 4.7 A number of local bus services (from Bromley Road and Warren Avenue) and rail services from Ravensbourne Station, are within an 850m walk distance from the Site (equating to a 10 minute walk or three minute cycle). SYSTRA's manual PTAL assessment (in accordance with TfL methodology) confirms a PTAL of 2, with the Accessibility Index of the Site increasing from 4.13 to 8.1 versus TfL's WebCAT system. Whilst this is still considered a 'poor' level of public transport accessibility, it represents a considerable improvement.

Development Precedence

- 4.8 A review of the London Boroughs of Lewisham and Bromley planning portals has been undertaken to confirm that the principle of residential development has been accepted by both authorities, including on Hillbrow Road. This review has confirmed that a number of applications seeking to increase residential density have been granted permission, as set out below. These applications are considered to present material factors relating to suitability of the Proposed Development.
- 4.9 Paragraph 109 of the National Planning Policy Framework (NPPF) states that "development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety, or on the residual cumulative impacts on the road network would be severe". The Technical Note has demonstrated that the Proposed Development will not



have a severe impact on the operation of the local road network or the safety of all road users. The condition of Hillbrow Road is pre-existing, and the road has operated without issue for a number of years. This would not be unacceptably impacted on as a result of the Proposed Development.

REASON FOR REFUSAL TWO

- 4.10 The proposed development would not be accessible to all users, due to a lack of step free access to any of the dwellings, contrary to Policy 3.8 Housing Choice, Policy 7.2 An Inclusive Environment and the Mayor's Housing SPG of the London Plan (2016), Policy 1: Housing provision mix and affordability of the Lewisham Core Strategy (2011) and DM32 Housing design layout and space standards of the Development Management Local Plan (2014).

RESPONSE TO REASON FOR REFUSAL TWO

- 4.11 This is not an issue that was raised by the Council during the course of the application. If it had been raised, we would have sought to address this matter during the application process. We have however proposed a solution and enclose amended plans to address the reason for refusal. These respond to the specific circumstances of the site.
- 4.12 The plans show a Part M compliant access platform near the entrance, accessed via the driveway. This would provide step free access to units 1 as well as improved access to the bin store. As the lift has to travel less than 2 metres, it is not enclosed.
- 4.13 Given the very limited vehicle movements, it is not considered that this will result in any conflict between pedestrians and vehicles. However, it is proposed that that the paving leading to the lift is consistent with that of the stepped access to assist with delineation for pedestrians.
- 4.14 London Plan policy 3.8 sets out that ten per cent of new housing must meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. London Plan policy 7.2 seeks an inclusive environment.
- 4.15 Policy 1 of the Lewisham Core Strategy sets out that all new housing is to be built to Lifetime Homes standards and 10% of all housing are to be wheelchair accessible or easily adapted for those using a wheelchair in accordance with London Plan policy.



- 4.16 Policy DM 32 of the Development Management DPD sets out that new housing must be designed to ensure that the internal layout and external design features mean that that housing is accessible to all intended users.
- 4.17 If the Inspector accepts the amendment to the plans, the reason for refusal can be fully addressed and the appeal proposal will be policy compliant in this regard.

REASON FOR REFUSAL THREE

- 4.18 The proposed first floor balcony to Unit 5 would give rise to a harmful level of overlooking into the rear garden of No.28 Hillbrow Road, contrary to Paragraph 127 of the National Planning Policy Framework (2019), Policy 15: High quality design of the Lewisham Core Strategy (2011), and Policy DM32: Housing design layout and space standards of the Development Management Local Plan (2014).

RESPONSE TO REASON FOR REFUSAL THREE

- 4.19 This is a matter which was not raised during the pre-application process but could sensibly have been discussed and resolved during the lengthy planning application process.
- 4.20 In response to this reason for refusal, we attach a plan prepared by Nick Willson Architects. This demonstrates how a simple, non-material change to the plans can address the issue.
- 4.21 In summary, we propose switching the open part of the balcony to face to the rear of the site, the open side is proposed to be screened with a perforated white metal mesh screen to allow light to pass through but to prevent overlooking. This has the additional benefit of retaining the amenity provision.
- 4.22 In terms of the policies raised in the reason for refusal, para 127 of the NPPF is included. We assume that this is 127 (f) as this refers to a 'high standard of amenity for existing and future users'. The proposed change would ensure this outcome.
- 4.23 Policy 15 of the Lewisham Core Strategy refers to High Quality Design for Lewisham – it is a detailed policy. The part that seems most relevant to this reason for refusal is the requirement for development that 'optimises the potential of sites and is sensitive to the local context and responds to local character'. With the proposed change to the balcony, this policy requirement would be met.



- 4.24 Policy DM32 of the Development Management Policies DPD sets out the requirement for all new residential development to provide a satisfactory level of privacy, outlook and natural lighting both for its future residents and its neighbours. The revisions to the balcony would ensure this privacy at the same time as maintaining openness to one side of the balcony and maintaining the level of amenity.
- 4.25 We ask that the Inspector accepts and considers this revised Plan as part of the appeal process. As the Council has the opportunity to respond to this appeal statement, they would be able to confirm whether the Plan addresses their concern and leads to the withdrawal of RFR3.

OTHER MATTERS

- 4.26 Whilst not a reason for refusal, the officer report (para 46) sets out that neither of the parking spaces are suitable for a wheelchair user as the parking is internal. However, this is incorrect as the parking is open sided and therefore accessible to flat 1.



5 CONCLUSION

- 5.1 From the outset of the preparation of the proposal, the appellant has been keen to engage pro-actively with the Council and the pre-application process was very constructive. It is disappointing that the application process has been so challenging and lengthy.
- 5.2 The Council stated that they were broadly happy with the proposal in August 2019. Given our regular contact with the officers between August and the determination of the application in May 2020, we would have expected better communication with regards to the issues raised in reasons for refusal 2 and 3. We could then have addressed these issues through the application process and been left with a sole reason for refusal to address through the appeal process.
- 5.3 We therefore respectfully request that the Inspector accepts the revised plans which have been prepared to address reasons for refusal 2 and 3. No-one will be prejudiced and the Council will have the opportunity to comment on these plans as part of the appeal.
- 5.4 The attached rebuttal statement from transport consultants Systra provides a clear response to the matters set out in reason for refusal one; concluding the condition of Hillbrow Road does not have an adverse effect on the movement and/or safety of pedestrians and cyclists.
- 5.5 We have sought to demonstrate through this appeal statement that the proposal is a policy compliant response to the site specific circumstances. It could come forward quickly in order to make a contribution to meeting the Council's high housing numbers.
- 5.6 We therefore request that the appeal is allowed.