

Matter 3: The order of the reasoned justifications for the Policy

1. We refer to paragraphs 30-34 of our Representations.
2. We agree that the main reason for the policy appears to be the increasing number of basement planning applications, and we do not believe that to be an appropriate basis for restricting basement development. We consider it an indication of the health of the sector, a sector which is capable of addressing a need for accommodation in central London of the highest quality.
3. We also believe basement development brings significant economic benefits to the area and that, provided it is well designed and executed, it is sustainable development which the planning system ought to support. In this regard we draw attention to the following
 - a. the important role the Development Plan plays in delivering sustainable development within the NPPF [paragraphs 151 to 152 refer, as does the final soundness requirement within paragraph 182: that the Plan should “enable the delivery of sustainable development”];
 - b. the requirement that it be positively prepared, that it be the most appropriate strategy for meeting development needs, and that it be effective in delivering the development required by the area. [paragraph 182].
4. In the Council’s evidence and in the supporting text to this restrictive and damaging policy there is simply no sign of the positive approach to delivering development which the NPPF requires.

- END OF HEARING STATEMENT -