

Re: 25/00905/PIP - APPLICANT'S COMMENTS

Officer's Report

Officer's Report @ 'Land Use' p61

The proposed land use of the site as a private residential dwelling with a parking garage and garden would be unacceptable in principle as it would result in the loss of public open space and would fail to be car free contrary to: Policies

G4 "protected open space "and

T6.1 "entirely car free development."of The London Plan 2021; Policies

CS19 "improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity, by protecting the amenity value of trees and retaining and planting more trees wherever practicable ",

DM16.2 "The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided.... the shortest practicable routes between relevant points. "and

DM16.5 "Developments in the City should be car-free except for designated Blue Badge spaces. " of the Local Plan 2015; and

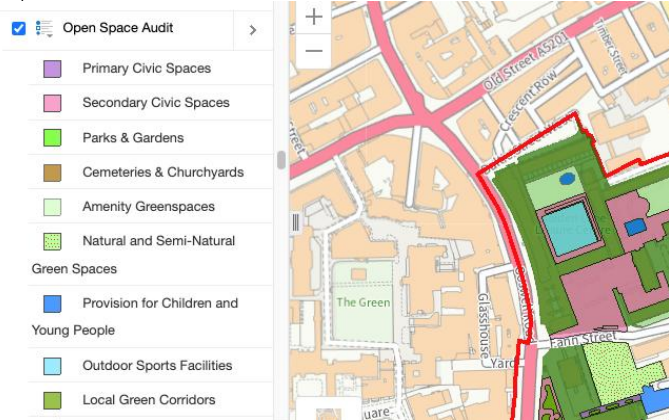
Baltic Street West self-build home

Applicant's comments

The land is NOT shown as public open space in any Planning Department data and a single disabled parking space will be required by current legislation for any dwelling.

Policy G4 The site is **NOT shown as an 'open space'** in Figure U: Open spaces at Core Strategic Policy CS19: Open Spaces and Recreation; **nothing in the Officer's Report confirms the open space as being 'protected'** **nor is it shown** as a 'green space' or a 'historic open space'

nor is it shown as having any open space designation on the City of London interactive planning map visited on 2025.10.24.



In fact the Baltic Wedge is **little used as there are far superior open spaces locally** on the South side of Hatfield House used by residents of GLE and local workers, and more recently at the West end of Baltic Street as provided by Islington Council landscaping and seating works- now used by local workers.

Policy T6 Car parking - B Car-free development should be the starting point for all development proposals E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking.....Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy. E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking. G Disabled persons parking should be provided for new residential developments... **as a minimum:** 1) ensure that for three per cent of dwellings, **at least one designated disabled persons parking bay per dwelling is available from the outset**

see Policy G4 above. The site is not shown as an 'open space' - **and I have committed to retain both trees, and improve the space by removing the paving and gardening it**

A better and safer route exists between the West of Baltic Street and the top of the ramp to the underground garages by continuing across the car park entrance at the barrier and along the continuous pavement to the car park - which is far better maintained and adds only a de minimis few metres to distance.

see Policy T6 Car parking above.... (one designated disabled persons parking bay per dwelling is available from the outset).

References

see below

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-policies-mapb-adopted-2015-revised-sept-2020.pdf>

So not https://www.cityoflondon.gov.uk/things-to-do/green-spaces_or_Historic_open_spaces_-_City_of_London

So not [City of London Web Mapping](#)

Extract from [City of London Web Mapping](#)

see the Officer's photographs

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-10-transport#table-of-contents>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-10-transport#table-of-contents>

Policies S14" work in partnership with developerspromote a greener City by protecting existing open and green space. ",

OS1 "**emerging** City Plan 2040 states that the quantity, quality and accessibility of public open space will be maintained and improved. Existing open space will be protected and enhanced. Any loss of existing open space should be wholly exceptional, and it must be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site. The loss of historic open spaces will be resisted."

VT3 "**emerging** City Plan 2040 states that development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards." of the emerging City Plan 2040.

Officer's Report @ 'Location and Amount' p62

The proposed location and amount of development would be unacceptable in principle as it would likely: have an unacceptable impact on the character and appearance of the area by failing to respect the urban grain, layout, scale and building lines of the existing street scene; cause less than substantial harm to the Grade II Listed Hatfield House and slight levels of harm to the Golden Lane Estate Registered Park and Garden and Barbican and Golden Lane Conservation Area which cannot be outweighed by the public benefits of the proposals; have an unacceptable impact upon the health and longevity of the two mature trees which occupy the site; have an unacceptable impact with regard to road dangers and the pedestrian environment; and result in poor residential amenity to the existing dwellings on the lower floors of Hatfield House and to the proposed dwelling; contrary to: Policies

D3 Optimising site capacity through the design-led approach',

G7'Trees and woodlands' and

HC1 'Heritage conservation and growth' of The London Plan 2021; and Policies

CS10 'Design',

CS12 'Historic Environment',

CS19 'Open Spaces and Recreation',

CS21 'Housing',

DM10.1 'New development',

DM12.1 'Managing change affecting all heritage assets and spaces',

DM12.5 'Historic parks and gardens',

see Policy G4 above. The site is not shown as an 'open space' - **and I have committed to improve the space by removing the paving and gardening it with as yet no encouragement to partner in greening having been offered by CoL.**

The Application should not be required to comply with future legislation_ see Policy G4 above. (The site is NOT shown as an 'open space' - **and I have committed to improve the space by removing the paving and gardening it.** nor is it shown as a 'green space' or a 'historic open space')

The Application should not be required to comply with future legislation. see Policy T6 Car parking above..... **(one designated disabled persons parking bay per dwelling is available from the outset).**

At Permission in Principle stage, it is surely **impossible to comment on these issues until a detailed proposal for Full Planning Permission is submitted.** The Officer appears to be jumping the gun. ps The site is outside Golden Lane Estate Registered Park!

Policy D3 is the framework for the City of London Local Plans which provide the detail to which I respond above and below.

Policy G7 is the framework for the City of London Local Plans which provide the detail to which I respond above and below.

Policy HC1 is the framework for the City of London Local Plans which provide the detail to which I respond above and below.

Policy CS 10 2. Encouraging design solutions that **make effective use of limited land** resources. **This is exactly what I propose.**

Policy C12 is only relevant in terms of my proposals effects on the Grade2 Listed GLE which **English Heritage show as minimal**; and the site is **outside the Conservation Area**, and the space is **NOT a 'Historic Garden'.**

see Policy G4 above. The site is not shown as an 'open space'

Policy CS21and **provide additional housing** in the City, concentrated in or near identified residential areas, 1. Exceeding the London Plan's minimum annual.. 4. Requiring all newunits to meet Lifetime Homes standards and 10% of all new units to meet Wheelchair Housing Standards (or be easily adaptable to meet these standards). **which is exactly what I am proposing!!!!**

Surely this is for a detailed NOT an Outline Application? Policy DM 10.1 To require all developments... to be of a high standard of design. I will maintain that I have been **a skilled architect and will only construct my own dwelling to the highest standards! (and I hope to finally win a RIBA Gold Medal for it)**

Policy DM 12.5 Development proposals.... that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development. **This has been provided by English Heritage who note only minor impact.** and 3.12.7 The information provided should be proportionate to the level of change or impact a proposal will have on the heritage asset or assets.

Policy DM 12.5 is about 'open spaces, gardens and churchyards which are of historic importance and is irrelevant!! see Policy G4 above **The site is NOT shown as an 'open space' nor is it shown as a 'green space' or a 'historic open space'.**

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

UNADOPTED <https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf>

UNADOPTED <https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf>

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

<https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf>

DM16.1 'Transport impacts of development' and	Policy DM 16.1 states "3.16.8 Development has the potential to create significant changes in transport demands and patterns which must be assessed at an early stage." but I would maintain that <u>a single dwelling will NOT make any significant change as I park further from my current dwelling and, if continuing to rent a garage, further from this proposed dwelling.</u>	https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf
DM21.1 'Location of new housing' of the Local Plan 2015; and Policies	Policy DM 21.1 - 1. New housing should be located on suitable sites in or near identified residential areas, and not result in poor residential amenity within existing and proposed development, including excessive noise or disturbance. 3.21.8 New housing includeshousing for the elderly. 3.21.12 Housing proposals for nine units or fewer will be assessed to determine if they are capable of delivering more units and consequently an affordable housing contribution. <u>This proposal complies with all requirements.</u>	https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-local-plan-adopted-2015.pdf
S3 Housing,	The Application should not be required to comply with future legislation.	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
S8 Self and custom housebuilding,	The Application should not be required to comply with future legislation and I am proposing <u>a development which fully complies "to maximise housing supply" ie supply the most possible and "in conjunction with large housing developments ie the Golden Lane Estate."</u> I note with concern that Policy S8 specifically states " <u>The City Corporation will encourage the provision of self and custom build units within large residential scheme's</u> " but sadly 10 years of negotiations prior to this submission have proved fruitless and discouraging.	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
S9 Transport and Servicing,	The Application should not be required to comply with future legislation but I intend to provide <u>"private transport for people with particular access needs.</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
S10 Active Travel and Healthy Streets,	The Application should not be required to comply with future legislation. See DM16.2 above - <u>better and safer pedestrian route exists</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
S11 Historic Environment,	The Application should not be required to comply with future legislation. See Policy DM 12.5 above and <u>English Heritage's report who note only minor impact and in the year I lived in Hatfield House I never once saw any architectural students viewing this aspect of the estate.</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
DE2 Design Quality,	The Application should not be required to comply with future legislation. See Policy DM 10.1 above <u>I will only construct my own dwelling to the highest standards!</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
DE3 Public Realm,	The Application should not be required to comply with future legislation. <u>This is all for consideration in detail at a Full Planning Application level.</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
HS1 Location of New Housing,	The Application should not be required to comply with future legislation. See Policy DM 21.1 above. <u>This proposal complies with all requirements.</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
OS5 Trees, and	The Application should not be required to comply with future legislation. Policy OS5 at 1. Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments <u>I intend to retain both trees and to plant more in the proposed garden</u> and at 4. Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; <u>I intend to retain both trees</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
HE1 Managing Change to the Historic Environment, of the emerging City Plan 2040.	The Application should not be required to comply with future legislation. <u>This is all for consideration in detail at a Full Planning Application level.</u>	UNADOPTED https://www.cityoflondon.gov.uk/assets/Services-Environment/City-Plan-2040.pdf
Officer's Report @ 'informative' p62	<u>I believe I have complied with all policies, and that the need to MAXIMISE housing overrides most objections. There have been no negotiations since submission of the application other than over the fee payable and refusal for the Applicant to speak at the meeting.</u> (10 years of negotiations prior to submission have proved fruitless and discouraging hence this Application.)	
Officer's Report @ p27	59. With regard to subparagraph A above, the site is in the City's ownership. In June 2025, the Housing Sub-Committee recommended the site should not be declared surplus to housing requirements by the Community and Children's Services Committee. On 17 September, the application went to the to the Community and Children's Services Committee with the recommendation to reject the application to declare this parcel of land surplus for housing purposes, which the committee voted to reject in line with the officer recommendation.	The sub-committee were misinformed in the earlier Officer's Report that I intended to remove the mature trees! <u>I seek to maintain the trees AND the housing use of the site.</u>

NOT in Officer's report

"In case it should become relevant in due course, could I put a marker down regarding the **landscaping costs in excess of £200k**. This does seem very high (and may be higher now than when the estimate was made)."

Date: 9 February 2017 09:05:23 GMT From: "Graves, David"
<David.Graves@cityoflondon.gov.uk>

NOT in Officer's report

" the City Corporation has a register and we are currently considering how we can meet the requirement to grant sufficient permissions to meet the demand evidenced by this register.....**the statutory requirement is merely to provide a sufficient number of permissions.**"

On 30 Jan 2017, at 16:53 -Peter Shadbolt, Assistant Director (Planning Policy),
Department of the Built Environment