

Recommendation Report for Planning Permission

REF NO: BR/82/26/PL

LOCATION: 63 Annandale Avenue
Bognor Regis
PO21 2ET

PROPOSAL: Demolition of the existing dwellinghouse and associated buildings, and the construction of a three-storey building comprising 9 No. self-contained flats with associated landscaping, refuse storage, bicycle storage and parking spaces. This application is in CIL Zone 4 (Zero Rated) as other development.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	This application seeks to demolish the existing dwelling and garage and construct a building comprising 9 No. self-contained flats with associated landscaping, refuse storage, bicycle storage and parking spaces.
	The building will be two storey with accommodation within the roof.
TOPOGRAPHY	Predominantly flat.
TREES	There is a large hedge along the front boundary and two trees, all of which are intended for removal.
BOUNDARY TREATMENT	The site has vehicular access via a dropped kerb with large hedge screening the property from the road.
SITE CHARACTERISTICS	The site is occupied by a detached chalet bungalow with a large garage structure adjoining the southwest boundary.
CHARACTER OF LOCALITY	The area is predominately residential.

RELEVANT SITE HISTORY

PAA/102/25/	Demolition of the existing dwellinghouse, and the construction of a three-storey building comprising 9no. self-contained flats, with associated refuse storage, bicycle storage, and parking spaces.	Approve Pre App 05-12-25
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REPRESENTATIONS

Bognor Town Council provided an objection

- Scale, bulk, massing and harm to the character of the area.
- The three storey building represents an excessive form of development that would appear unduly dominant within the street scene.

- It would replace a single storey building with a substantially larger building.
- It is positioned further forward on site, making it visually more prominent and exacerbated by removal of the trees and hedging.
- Overdevelopment of the site.
- Unacceptable impact upon neighbouring residential properties through overlooking, loss of light, overshadowing and overbearing presence.
- Insufficient information has been provided to demonstrate that the proposed drainage strategy would adequately manage surface water runoff.
- Insufficient information has been provided to demonstrate that biodiversity will be conserved and enhanced.
- Does not provide the level of parking required in accordance with SPD.
- The parking survey was undertaken at a time when peak parking would not be reflected.

35 letters of objection received and one letter of no objection

- Concerns about parking
- The hedge should be removed to better allow pedestrians to walk past.
- Unacceptably oversized.
- It will have a detrimental impact on neighbouring residents.
- It does not state how overcrowding will be controlled.
- The dwellings only meet the minimum space standards.
- The hedge to be removed provides habitats.
- The parking survey is not sufficient and does not take into account cars at this development.
- The road is already congested.
- The appearance of the building is out of place.
- This represents a fundamental change to the character of the area.
- The overall height and size of the building is out of keeping.
- This could increase surface water runoff.
- Parking is a nightmare for existing residents and this will make it worse.
- This will significantly overshadow my property.
- This will impact upon house prices.
- Robust and independently verified evidence, that both foul and surface water drainage can be adequately managed should be provided.
- The road does not have capacity for more traffic.
- It would provide overlooking into all habitable rooms.
- it would reduce light into neighbouring gardens.
- General construction traffic and working hours will make the road inaccessible.
- Concerns about asbestos removal.
- There is no clarity about who will occupy the building.
- Waste storage should be carefully assessed.
- More details are needed to clarify levels of support tenants may require.

COMMENTS ON REPRESENTATIONS RECEIVED:

Comments noted and addressed in the conclusion.

The parking survey would not count vehicles for this development as the survey is used to indicate number of current available parking spaces and whether there is capacity for extra vehicles.

Concerns have been raised about the site being used for caring/special needs facilities. If the property were to be occupied for care/medical facilities this falls under use a different use (C2) and therefore would need to be specified in the description.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

Southern Water - Not located within Southern Water Statutory Area for water supply.

ADC Drainage Engineers - Object. Groundwater investigation should be submitted to evidence that infiltration is feasible. Full comments can be viewed online against the application.

WSCC Minerals and Waste - No objection.

WSCC Highways - No objection subject to conditions.

ADC Ecologist - Hold for further information. Bat emergence surveys are required prior to determination. Plans suggest habitat affected would be over 5sqm and statutory BNG would apply.

Environmental Health - No objection.

Private Sector Housing - No objection subject compliance with aspects relating to fire safety. Full comments can be viewed online.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted.

POLICY CONTEXT

Built up area boundary

Pagham Harbour Zone B

2k buffer zone for SSSI (Bognor Reef)

DEVELOPMENT PLAN POLICIES

[Arun Local Plan 2011 - 2031:](#)

DDM1	D DM1 Aspects of form and design quality
DDM2	D DM2 Internal space standards
DSP1	D SP1 Design
ENVDM2	ENV DM2 Pagham Harbour
ENVDM4	ENV DM4 Protection of trees
ENVDM5	ENV DM5 Development and biodiversity
ECCSP2	ECC SP2 Energy and climate change mitigation
SDSP2	SD SP2 Built-up Area Boundary
TSP1	T SP1 Transport and Development
WDM2	W DM2 Flood Risk
WDM3	W DM3 Sustainable Urban Drainage Systems

PLANNING POLICY GUIDANCE:

NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

POLICY COMMENTARY

The Development Plan consists of the Arun Local Plan 2011 - 2031, West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is considered to conflict with relevant Development Plan policies in that insufficient information has been provided to demonstrate that infiltration is viable nor has information been provided to satisfy biodiversity net gain requirements. A legal agreement to secure contributions is also not completed.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that

- (2) in dealing with an application for planning permission the authority shall have regard to -
- (a) the provisions of the development plan, so far as material to the application,
 - (aza) a post examination draft neighbourhood development plan, so far as material to the application,
 - (b) any local finance considerations, so far as material to the application, and
 - (c) any other material considerations.

OTHER MATERIAL CONSIDERATIONS

There are no other material considerations to be weighed in the balance with the Development Plan.

BIODIVERSITY NET GAIN

The application is liable for mandatory biodiversity net gain. The application form stated the development was exempt however more than 5sqm of habitat is impacted. For applications made on or after 6 August 2026, developments with a site area of 0.2 hectares or below are exempt, provided they do not impact on-site priority habitats. The application was submitted prior to this date on the 25/6/26 and is liable for net gain.

No information regarding pre or post development values or off site details have been provided to address this.

CONCLUSIONS

PRINCIPLE

The proposal seeks permission for 9 flats within the built-up area boundary (BUAB). This accords with policy SD SP2 of the Arun Local Plan (ALP) which aim to focus new development within the BUAB.

Policy S4.1 of the NPPF (2026) states that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework.

The Arun Design Guide and Arun Parking Standards SPD are also pertinent.

Bognor Regis has a made Neighbourhood Plan although none of the policies are relevant to this application.

DESIGN AND VISUAL AMENITY

ALP policy D DM1 looks at aspects of form and design quality. Policy D SP1 requires that development proposals make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

The existing site is occupied by a detached chalet bungalow. There is also a detached pitched roof garage to the south western boundary. The existing dwelling is set back to the rear of the site, with a large amount of space retained to the front. View of the existing property are largely screened by a large hedge which runs along the front boundary.

The proposal seeks to demolish the existing buildings and construct a detached building which will form 9 flats. The building would have a hipped roof with a gable projection to the front and rear. The proposed building is large and would occupy approximately half of the site. The siting of the building has been brought forward as opposed to being in the same location as existing. Whilst this does make it appear more prominent, the position would be similar to neighbouring properties and those along Annandale Avenue and would make a more efficient use of the space, providing a private amenity space to the rear which is not achieved in its current form.

The surrounding properties are varied in size, although are all predominately detached or pairs of semi detached dwellings. The design proposed has attempted to replicate the appearance of the pairs of semi-detached dwellings present in the vicinity. Materials will consist of a red brick with red roof tile. A light grey/white render with dark grey cladding boards will be to the front facing gable. This is in keeping with the wider area.

Concerns have been raised regarding the overall size of the building and its three storey build. Whilst the description states three storeys, the building would appear as two storey with accommodation within the roof slope and it is not three storeys in height. The site will remain in residential use which is in keeping with the wider residential character of the area.

The development will increase in height 2.2m compared to the bungalow that currently exists and will be taller than the adjacent dwellings by approximately 1.6m. This is not a significant amount and would not result in the property appearing adversely out of character or prominent within the street scene. The building would retain 1.5m to each side boundary. There is additional separation retained between the boundary and neighbouring dwelling and therefore the property would not form a terracing effect.

The development would be set back from the front boundary by 7.5m and retains space for 3 parking spaces and some planting. There would also be a bin store. Paths would run along the side boundaries

to provide side access for units 1 and 2 and access to the rear amenity space and cycle store. Access to the remaining flats would be from the principal elevation.

The Arun Design Guide (ADG) states development should 'Responds to the existing scale and massing of the surrounding built environment, emulating this scale in the majority of cases' but also 'incorporates architectural forms and features that predominate in the surrounding area'. 'Provides visual interest through attractive detailing, high quality materials, depth and shadow lines and fenestration, and through variation in form, features and materials'. The proposal achieves this, with its design similar to that of nearby properties.

Whilst it is acknowledged that the building is larger than that currently on site and of neighbouring properties, it is not of a such a scale in which it appears out of character or overbearing upon the street scene. The proposal complies with ALP policies D DM1 and D SP1.

RESIDENTIAL AMENITY

ALP policy D DM1(3) indicates planning permission will only be granted where it has minimal impact on the users or occupiers of nearby land. This would be avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

The existing dwelling and garage building runs along the boundary of the neighbouring rear garden (61a) and with the building being relocated to the front of the site, this is likely to reduce the overshadowing/overbearing impact that is currently experienced and result in an improvement. The property does extend slightly beyond the rear elevation of No.61a to the southwest with a two storey gable projection to the rear elevation. However, this is stepped in from the side elevations with 5.6m and 6.5m retained to the side boundaries and therefore does not result in adverse overbearing impact.

Concerns have been raised that the property will result in overlooking and loss of light to neighbouring dwellings. No.61a has two side facing ground floor windows which serve a living room and a door. There is also a first floor bedroom window and dormer window. There will be some impact to these windows, through the introduction of development being positioned further forward, between the dwellings, however there is a living room window to the principal elevation also and with space retained to the boundary and with the the roof hipping away from the properties, this would not be a significant impact which would justify a refusal. No.63a has two small ground floor windows and first floor windows. It is not clear what these serve but due to their size, they do not appear to serve as windows for a habitable space such as living room/bedroom. There is also a conservatory to the rear. 6.5m would be retained to the boundary to the northeast with the conservatory which would ensure it would not give rise to significant overbearing or overshadowing.

Sufficient space is retained to neighbouring boundaries. As a result, it is not deemed to give rise to adverse overbearing or overshadowing.

The development has a number of windows to the principal elevation which will overlook the street scene. To the rear, there will be 4 windows at first floor and 3 to the second floor. There are no side facing windows proposed to the development. There will be some overlooking achieved which is not currently possible due to the addition of a first floor. These would enable views of a 45 degree angle over neighbouring gardens however it would not achieve views into direct windows and the views would be similar to that achieved at other neighbouring first floor windows.

To the rear of the site, there is a two storey block of flats with a row of garages, located to the rear western boundary. There would be approximately 12m retained from the rear building line to the boundary and a further 13m to the flats. The Arun Design Guide provides interface distances between residential properties and recommends a back to back separation distance of 21m be retained between

habitable rooms. The proposal would achieve this.

Due to the nature of the use proposed, which would feature 9 individual flats, there would be increased noise and coming and goings from the site. Environmental Health have raised no objections and do not request conditions for noise and this is acceptable.

The proposal is not deemed to result in significant harm upon neighbouring amenity and complies with ALP policy D DM1 and D SP1 and the ADG.

SPACE STANDARDS

The national guidance advises the following minimum Gross Internal Area (GIA) standards apply:

The flats are all proposed as 1B1P units with a floor space between 43sqm and 45 sqm. This complies with requirements and exceeds the minimum standards.

Arun District Council has no size standards in respect of private gardens but would instead take a view at the time of an application as to the quality & quantity of proposed private amenity space. The supporting text to ALP policy D DM2 refers to the Arun Design Guide SPD which include guidance on external space standards, and the need for applications to have regard to include adequate provision of private external space.

Section H of the ADG provides a guideline that communal shared spaces, such as shared external amenity space, should be at minimum 40sqm, plus 10sqm for each unit. With 9 units proposed, the development would require 130sqm of communal external amenity space. The site has a rear garden with an approx. area of 275 sqm and this would exceed requirements.

The ground floor units would also have a small area of external private amenity space, directly to the rear and this is a positive. The plans show hedging although it is not clear if fencing is also proposed to separate the private and communal area. Details of this can be conditioned.

The proposal complies with relevant policies.

BIODIVERSITY

To comply with Policy ENV DM5 a biodiversity net gain should be demonstrated on site, this can be achieved through the installation of features such as green roofs, bird/bat boxes or the provision of new habitat on site.

Buildings B1 and B3 are considered to have moderate suitability for roosting bats. As a result, the ecology survey submitted with the application stated that a minimum of two dusk emergence surveys per building are required to be undertaken between May and September inclusive to determine the presence or likely absence of roosting bats. Building B2 is considered to have low suitability for roosting bats therefore a minimum of one dusk emergence survey is required. These surveys have not been completed. Precautionary working methods are recommended for badger, hedgehog and nesting birds.

Most of the site features hard standing with some garden area to the south. The proposed works will result in the loss of habitats of generally low ecological value, predominantly comprising urban habitats, managed garden habitat, an ornamental hedgerow and two individual trees.

There are two trees on site and a large hedge that will be removed. These are not protected and are not within a Conservation Area and therefore do not require permission for removal.

The loss of the above habitat is over 5sqm. If more than 5sqm is being impacted statutory biodiversity

net gain applies. No details have been provided to demonstrate the gains or losses on site. A BNG metric should be provided which measures the biodiversity value of habitats and is used to assess how a development might change the biodiversity value of a site.

Whilst new exemptions have come into force which exclude sites under 0.2 hectare from providing BNG this only applies to applications submitted after 6th of August 2026 and as this was accepted on the 25/06/2026, the requirement still applies.

In the absence of a BNG metric and details of how a minimum 10% biodiversity net gain will be achieved, the application has not demonstrated that it can achieve biodiversity net gain. In the absence of bat emergence surveys, the application has also not identified that it would not result in harm upon bats which may use the buildings. The proposal conflicts with ALP policy ENV DM5 and the NPPF.

PARKING/HIGHWAYS

ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport.

Policy TR6.4 of the NPPF states 'Development proposals should be refused if they would have a severe adverse impact on the transport network.....'.

WSCC Highways have no objection and do not anticipate that the development would give rise to a significant intensification of movements to or from the site.

The ADC Parking Standards for a 1 bed property in this type of location (Parking Behaviour Zone 4) requires an expected level of 1 car parking spaces per dwelling. In this case, the proposal seeks 9 flats and therefore a total of 9 spaces is required. In addition to the above, visitor parking should be provided at 20% of the total number of residential units.

The proposed floor plan demonstrates 3 spaces to the front boundary which will be capable of EV charging and there is a shortfall.

A parking survey has been completed. This examines the roads within 200m walking distance of the site to establish the existing parking levels. This study is used to assess whether there would be capacity for additional parking generated by the development. The survey took place between 1am and 5.30 am on a Tuesday and Wednesday. The timings were chosen as it is likely that occupiers are at home during the night and therefore it would represent peak parking, rather than a daytime survey where occupiers are likely at work etc. The results showed that parking was at approximately 81% capacity on both days.

85% is an indicative level at which parking stress becomes a cause for concern and as the survey indicated results below this, there would likely be capacity for additional vehicles.

The site is a sustainable location and is a 10 minute walk from Bognor Regis railway station and a 20 minute walk to the high street for shops and services. There is also on-street parking available and the shortfall is unlikely to result in adverse harm upon the highway in which a refusal is justified. 18 available spaces were recorded on Tuesday, and 17 on Wednesday.

Whilst the development would not comply with ADC Parking Standards as it does not provide sufficient levels of parking, it has demonstrated that there would be on street capacity and it would not result in adverse harm upon parking in the area in compliance with ALP policy T SP1.

FLOOD RISK AND SURFACE WATER DRAINAGE

The site is located within Flood Zone 1 and as outlined within the submitted Flood Risk Assessment, is at

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low risk of flooding from all sources. The proposal is in accordance with Policy W DM2 of the ALP.

ALP policy W SP1 states that development will be encouraged to make water efficiency measures, enhance the quality of the water environment and will be encouraged to make active use of surface water as a design feature where it can provide additional flood relief.

ALP policy W DM3 states all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS) as appropriate to the size of development. This includes applying the drainage hierarchy, which prioritises discharge locations for surface water on site. These documents are clear, each priority location should be fully optimised to discharge surface water before moving on to the next priority location. Robust evidence is required to prove a discharge location is not feasible before moving down the hierarchy. Evidence should include groundwater monitoring and infiltration testing to demonstrate if infiltration is viable which should be the first method for discharge.

The Drainage Statement states the parking area and footpaths will be constructed using permeable paving to allow surface water to infiltrate. The development would however result in a net reduction of impermeable area. Runoff from the roof areas will be captured into a soakaway, with landscaped areas to drain directly to the ground.

The ADC Drainage Engineers object. Disposal is proposed via infiltration. No ground investigations have been provided to demonstrate that this is feasible. Further interception methods which could affect the scale and layout may be required if infiltration is not feasible. The drained areas do not match the calculations provided and it is not clear if urban creep is incorporated.

Without groundwater investigations it cannot be confirmed that infiltration is achievable on site. This could have implications for the scale and layout if alternative methods are required.

The development has not demonstrated that infiltration is achievable and that it would not result in an increased in surface water drainage at the site in conflict with ALP policy W DM3 and the policy F8.2(a) of the NPPF.

ENERGY EFFICIENCY

ALP Policy ECC SP2 requires new residential development to be energy efficient and to demonstrate how they will achieve energy efficiency measures that reflect the current standards, use design and layout to promote energy efficiency, and incorporate decentralised, renewable, and low carbon energy supply systems such as solar panels.

The proposal would have the opportunity to introduce energy efficiency measures and the details provided state that low carbon heating systems such as air source heat pumps will be used, smart heating controls and low energy lighting throughout

Subject to conditions providing specific detail showing the energy efficient measures the building will include, the proposal would comply with relevant policy.

PAGHAM HARBOUR

The site falls within 5km of Pagham Harbour which is designated as a Special Protection Area and Ramsar site. ALP policy ENV DM2 requires any proposals for new residential development within the Pagham harbour buffer zone (0 to 5km) to pay a contribution of £974 per new unit to contribute towards strategic access management measures. The rate changes every April.

A template is with the Council's legal department. This has not been completed. An email was sent to the agent on the 7th July requesting further details such as clarification as to why the bank have not been

included into the UU agreement and whether the signatory is acting under a power of attorney. No response was received.

The proposal would require contributions of £8,766 towards Pagham Harbour mitigation to accord with policy which is not secured.

SUMMARY

The development falls within the BUAB where the principle of development is acceptable subject to compliance with relevant policies.

Policy S4.2 of the NPPF provides a list of circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects. The criterion identified are not relevant to this application however the policy does states it includes (but are not restricted to).

The proposal is compliant with policy in matters surrounding design and character, residential amenity, transport and parking however it conflicts with ALP drainage policy W DM3 and NPPF policy F8. This policy refers to sustainable drainage systems. F8.2 (a) states that sustainable drainage system should 'be designed in accordance with the National Standards for Sustainable Drainage Systems'. Insufficient information has been provided to demonstrate compliance with this. The proposal also conflicts with policy relating to biodiversity. The site is required to deliver 10% mandatory net gain and no details of this have been provided to comply with this. Bat emergence surveys are also required as per the ecology report and these have also not be provided and it is not proven that the site would not result in harm to bats in conflict with ALP policy ENV DM5 and NPPF policy N2.(a).

A S106 agreement has not been completed to secure contributions towards Pagham Harbour SSSI and this is in conflict with ALP policy ENV DM2.

Overall, the substantial weight given to the benefits of providing homes which contribute towards housing need as per policy L2.1 are outweighed by the significantly demonstrable negative impact as discussed above. The application is therefore recommended for refusal.

HUMAN RIGHTS ACT

The Council in making a decision, should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (Right to respect private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for refusal of permission in this case interferes with applicant's right to respect for their private and family life and their home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of neighbours). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for refusal is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership,

pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

SECTION 106 DETAILS

The site falls within 5km of the Pagham Harbour Management Zone which is a Special Protection Area. Any proposals for new residential development which is likely to have an impact (within the 5km zone) is required to contribute £974 per unit. This has not been completed.

CIL DETAILS

This application is CIL liable, therefore, developer contributions towards infrastructure will be required (dependent on any exemptions or relief that may apply).

RECOMMENDATION

REFUSE

- 1 The development fails to provide adequate surveys and details in respect of bat emergence surveys. Without precise knowledge of which species and how big populations are, appropriate mitigation cannot be determined. Given the amount of unknowns, the proposal may give rise to significant harm upon bats on site. The proposal fails to accord with Arun Local Plan policy ENV DM5 and policy N2 of the NPPF (2026).
- 2 The application impacts more than 5sqm of habitat and was submitted before 6th August 2026 and is not exempt from biodiversity net gain as listed in the application form. The development has not provided the required biodiversity net gain information including BNG metric calculation, baseline habitat data, the approach taken to enhancing biodiversity on site, proposed off-site biodiversity enhancements (if applicable) and is in conflict with Arun Local Plan policy ENV DM5, policy N2 1(a) of the NPPF 2026 and the Environment Act 2021.
- 3 Insufficient evidence and investigations in the form of winter groundwater monitoring and infiltration testing have been submitted to confirm that the proposed development could be adequately and sustainably drained in accordance with the National Standards for Sustainable Urban Drainage Systems (NSfS). As such, it cannot be confirmed that the proposal would not increase flood risk on site or elsewhere in conflict with the NSfS, Arun Local Plan policy W DM3, and policy F8.2 (a) of the NPPF 2026.
- 4 The proposal fails to make a financial contribution towards the agreed strategic access management measures to mitigate the harm to the Pagham Harbour Special Protection Area in conflict with policy ENV DM2 of the Arun Local Plan.
- 5 **INFORMATIVE:** Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. It has not been possible to resolve those matters within the timescale allocated for the determination of this planning application. The Local Planning Authority has clearly set out, within its report, the steps necessary to remedy the harm identified within the reasons for refusal - which may lead to the submission of a more acceptable proposal in the future. The Local Planning Authority is willing to provide pre-application advice in respect of any future application for a revised development.