

Recommendation Report for Planning Permission

REF NO: LU/136/21/PL

LOCATION: Mewsbrook House
59 East Street
Littlehampton
BN17 6AU

PROPOSAL: Second & third storey extensions to existing care home to provide 14 No. new residential care rooms. This application may affect the setting of listed building, may affect the character & appearance of the East Street Conservation Area & is in CIL Zone 4 (Zero Rated) as other development.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	The proposal relates to second & third storey extensions to the existing care home to provide 14 No. new residential care rooms totalling an additional 627m² of floor area. There are no changes to the Ground Floor layout, at First Floor it is proposed to remove 9 smaller rooms and replace them with 7 new rooms with en-suites. and at Second Floor it proposed to provide 16 new rooms with en-suites and 1 assisted bathroom. The new extended area will match the existing building in appearance. The proposed walls are to be painted render with a slate roof. The windows in the proposed areas are to be white UPVC to match in style with the existing section of the building.
SITE AREA	1904 sq metres
TOPOGRAPHY	Predominantly flat. The site level rises to the North.
TREES	None of any significance affected by the proposed development. One large oak tree on site frontage with East Street.
BOUNDARY TREATMENT	Flint walling to site frontage with East Street and Green Lady footpath to approx. 2-3 m height. Frontage to access road is open in part and part enclosed by mesh fencing and close boarded fencing.
SITE CHARACTERISTICS	The application site comprises a detached Grade II Listed Building with gardens to the Southern side, and parking to the North. The building has cream painted rendered elevations and a slate roof. The section closet to road is 3 storeys with accommodation within the mansard roof and the northern portion is 2 storey. The link between the buildings is single storey on the eastern side of the site.
CHARACTER OF LOCALITY	The area is part of a residential street within East Street Conservation Area. The police station is located to the north

and new link road to east

RELEVANT SITE HISTORY

LU/205/00/	2 storey extension to provide additional bedrooms and assisted bathrooms and single storey extension to provide new entrance and office	ApproveConditionally 06-09-00
LU/59/98	Proposed single storey extension and internal alterations to existing nursing home	ApproveConditionally 22-05-98
LU/299/93	Addition of conservatory to front of property to be used as a dayroom for patients and their families	ApproveConditionally 10-12-93

REPRESENTATIONS

Littlehampton Town Council - No Objection

One Objection

- Lack of detail and explanation in the Heritage and Design and Access Statement which fails to consider the impact on the East Street Conservation Area.
- Adverse impact of the height of the extensions on the Western elevation on the rear gardens of properties on the northern side of East Street. There is scope for upward extension on the eastern and southern elevations but the proposals as submitted do not take into account the site's orientation.

COMMENTS ON REPRESENTATIONS RECEIVED:

The impact of the proposal on the Conservation Area and residential amenity are addressed in the conclusions section of this report.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

Drainage Engineer - No Objection

Due to the scale of the application (no increase in impermeable area) we have no conditions to request. Any alterations to surface water drainage must be designed and constructed in accordance with Building Regulations.

Conservation Officer - Objection

The application documents do not include an adequate heritage asset assessment, i.e. one which describes the significance of the assets affected along with an assessment and understanding of the potential impact of the proposals on that significance. The application does not therefore meet the requirements of paragraph 189 of the NPPF. As a consequence, this information should be submitted

during the lifetime of this application. This is disappointing as failure to provide this will mean that a thorough assessment cannot be made.

The listed building is probably C18, 2 storey and tall hipped mansard roof. The special character and appearance of the conservation area largely derives from the great variety in age (although the majority of the buildings are Victorian and Edwardian), style, form and function of the buildings within the area. Large formal buildings, such as Roland House and Winterton Lodge and the Manor House. Mewsbrook House makes a positive contribution to the character and appearance of the conservation area where its pale coloured stuccoed facades contrast pleasantly with nearby flint buildings and walls.

The building has already been altered with large two storey extensions being constructed in order to provide for additional accommodation. Whilst these are to the rear of the building, they are clearly visible from the surrounding public road and path network. Whilst the extensions are considered to be of a standard, if somewhat plain design, they are at least, visually subservient in scale (in terms of height) to the listed building.

The extension would have the same number of floors as the listed building with a higher eaves and roofline. The result will be an extension that is both larger in scale and height, and no longer subservient to the main listed building. This along with the existing large footprint would mean that it would dominate the listed building. The additional floor would therefore detract from the prominence of the listed building.

uPVC windows are often crudely detailed, and the size of frame is usually much larger than that of a traditional window, giving uPVC windows an obtrusive, 'chunky' appearance. The shiny finish of uPVC is also out of keeping with traditional materials. Therefore, the use of UPVC cannot be supported as it is considered to be harmful to the listed building.

Based on the comments above, it is considered that the proposal is such that the impact can be described as causing less than substantial harm in accordance with paragraph 196 of the NPPF (2019). As such, you will also need to consider the public benefits that the development may achieve as part of your assessment of the application, along with the contents of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

Environmental Health - No Objection

Conditions suggested in respect of construction and plant noise.

West Sussex County Planning Officer

Contributions required in respect of libraries and fire and rescue.

County Highway - No Objection.

In terms of vehicle trips the proposal is not expected to significantly lift trips at the junction of Patterson Wilson Road/East Street or affect local highway network capacity. In terms of parking no extra parking is proposed, nor an increase in staff. The LPA may wish to consider the parking allocation against their parking standards. From a highway safety perspective there are double yellow lines in place locally to prevent any over spill parking from taking place at unsafe locations on the highway.

The Local Highway Authority does not consider that the proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 109), and that there are no transport grounds to resist the proposal.

Conservation Area Advisory Panel - Objection

- No 59 East Street, Listed Grade 2, occupies a prominent position in East Street and at 2 storeys in

height with a distinctive tall mansard roof above, it makes a positive contribution to the character and appearance of the conservation area. Extensive two storey extensions of indifferent design have been added, probably in the late 20th century, but at least they are visually subservient in scale to the historic building. The proposals to add an extra storey to these extensions will mean that they are no longer subservient and will crowd and materially detract from the prominence and setting of the listed building.

- The bland facades and the overlarge scale, massing and form of the extensions will be visually discordant and overbearing in relation to the historic building; made even worse with the additional proliferation of pVCU windows. As such the proposals will also detract materially from the character and appearance of the conservation area.

- The Heritage Statement submitted with the application does not address, as it should, the likely impact of the proposals on the listed building and the conservation area.

- It is considered that the proposals fail to comply with the requirements of the Listed Building Act 1990. In addition, they conflict with the relevant paragraphs of the NPPF and policies contained in the ADLP relating to the protection of designated heritage assets together with their settings and planning permission should be refused.

COMMENTS ON CONSULTATION RESPONSES:

- comments noted

POLICY CONTEXT

Designation applicable to site:

Within Built Up Area Boundary

Grade 2 Listed Building

Conservation Area

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
DDM4	D DM4 Extensions&alter to exist builds(res and non-res)
HDM2	H DM2 Independent living and care homes
HERDM1	HER DM1 Listed Buildings
HERDM3	HER DM3 Conservation Areas
HERSP1	HER SP1 The Historic Environment
TSP1	T SP1 Transport and Development
ECCSP2	ECC SP2 Energy and climate change mitigation
ENVDM5	ENV DM5 Development and biodiversity

[Littlehampton Neighbourhood Plan 2014 Policy 1](#) The Presumption in Favour of Sustainable Development

Littlehampton Neighbourhood Plan 2014 Policy 2 A Spatial Plan for the Town

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 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 it would have an adverse impact on the visual amenities of the locality and result in an overly dominant form of development.

Where the building is located in a Conservation Area, Section 71(1) of the Act states:

In the exercise, with respect to any buildings or other land in a Conservation Area of any powers (under the Planning Acts), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

The proposal is considered to conflict with these criteria in that it is considered to be overly dominant and materially affect the character and setting of the Grade II Listed Building and the character and appearance of the Conservation Area.

OTHER MATERIAL CONSIDERATIONS

It is considered that there are/are no other material considerations to be weighed in the balance with the Development Plan.

CONCLUSIONS

Principle

The application site is located within the built up area boundary, where the principle of development is acceptable subject to accordance with the relevant development plan policies, as stated in SD SP2 of the Arun Local Plan. In this case, the key policies are D DM1, D DM4, H DM2, HER DM1 and HER DM3 of the Arun Local Plan.

Compliance with policy H DM2

The proposal is considered to be in accordance with H DM2 (a), (b), (c) and (f) relating to care home proposals. No additional outside amenity space for residents is being provided but there is an existing garden to the South of the home which is reasonably well screened from traffic activity being enclosed by a high flint wall. Many of the residents may be housebound and the outside space would be mainly used by some residents and family members/visitors. The use of this garden by additional residents and their families would be acceptable in accordance with part (e). However given the height and size of the proposed extension and its dominating impact on the Conservation Area and original part of the listed building the design and scale are not appropriate to local context and no additional amenity space is being provided for the increase in residents. The proposal therefore conflicts with part (d) of the policy. The impact of the design and scale are discussed in more detail below.

Visual Amenity

The existing home has 2 elements, the older original section closest to East Street which comprises 3 storeys with the accommodation contained within the mansard roof which produces a low overall roof height and low eaves height resulting in a building that is not overly prominent in the street scene and which is visually integrated with its surroundings. This higher element is then attached to a later 2 storey addition which from the east, where it is readily visible, appears a modest and relatively detached extension which is also visually integrated into its setting. The later addition has a greater footprint than the southerly element, but does not compete visually with the original listed building given its overall height. The building in its current form clearly separates and splits the built form across the site to limit its bulk and scale to an acceptable level. Most of the buildings on this side of East Street are 2 storeys high and of traditional design and domestic in scale and the 2 storey element of the existing building is similar in height to these properties. The proposed extension would not appear visually subservient to the original building in conflict with the requirements of policy D DM4 of Arun Local Plan. The height and extent of the additional floor would fail to be successfully visually integrated and would serve to result in an unduly prominent building which is out of keeping with the scale and bulk of adjoining developments.

The design of the extension is also unacceptable in that the addition of more upvc windows and replication of a design which is not reflective of the original listed buildings in terms of detailing serves to increase the visual prominence of the generally featureless modern style elevations of the building within an area of historic character. The proposal is not sympathetic in terms of massing, design, form and scale and is not therefore compliant with policies D DM4 and D DM1(1) and (2) of Arun Local Plan.

For the reasons set out above the proposal is also contrary to Part J of Arun Design Guide' Building Design' which requires development to ensure that the scale and massing of development responds to the existing townscape and landscape. New development should generally reflect the scale of existing buildings.

Residential Amenity

Policy QE SP1 requires all development to contribute positively to the quality of the environment and to ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

Policy D DM1 (3) of Arun Local Plan requires development to have minimal impact upon the users and occupiers of nearby property and land, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

The proposed development would result in harmful overbearing impacts upon the occupiers of the nearby dwelling to the west 57a East Street and would adversely impact on the outlook which would be

onto a full 3 storey height elevation with little opportunity to look over the roof area. This is due to the siting of the third storey extension being 9m from the front elevation of the dwelling and 8.3m from its front boundary. This dwelling has a limited residential curtilage and the resultant separation distance is minimal. 2 first floor windows in the dwelling face the adjacent footpath and the area of the extension. The height of the extension and close proximity to the dwelling result in materially adverse overbearing impacts in conflict with policies D DM1(3) and D DM4(c) of Arun Local Plan.

In addition the west elevation of the extension includes further windows facing the dwelling which would afford view into first floor windows of the dwelling resulting in a loss of privacy in conflict with policy D DM1(3) and D DM4(c) of Arun Local Plan.

Part J of Arun Design Guide refers to privacy measures and suggests where building separation distances between habitable rooms are 15m or less, as is the case here, multiple design initiatives will likely be necessary, such as staggered facades, recessed balconies, mature landscaping and louvres on windows. In part H a Front to Front guideline min. of 16m between habitable rooms of properties facing each other is suggested. The rear to front distance falls way below this standard.

Outside amenity space for residents is provided as a garden to the South of the home. Many of the residents may be housebound and the outside space would be mainly used by some residents and family members/visitors.

Having regard to potential for noise and disturbance, the car parking area is set back over 30m from East Street itself and its screened by built form to the closest residential dwelling (57a East Street).

Listed Building Considerations

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have special regard for the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. The application documents do not include an adequate heritage asset assessment, i.e. one which describes the significance of the assets affected along with an assessment and understanding of the potential impact of the proposals on that significance. The application does not therefore meet the requirements of paragraph 194 of the NPPF.

The relevant Local Plan policy for assessment of the impact on the setting of adjacent Listed Buildings is policy HER DM1 which states that proposals affecting statutory Listed Buildings will be required to (a) preserve and enhance the historic character, qualities and special interest of the building (d) protect the special interest of the buildings of architectural or historic interest and (e) protect and where possible enhance the setting of the building.

Mewsbrook House is Grade 2 Listed with pale coloured stuccoed facades, a slate mansard roof and is enclosed on its frontage by tall flint walling, much of the space within its curtilage is occupied by earlier extensions. The immediate setting of Mewsbrook House has been severely truncated with these extensions, but they do not dominate the original building and appear subservient to it. The listed building's wider setting is comprised of a small collection of historic residential properties to its west fronting the northern side of East Street, demonstrating Littlehampton's village like characteristics prior to the 20th century. These elements of the listed building's setting contribute positively to its significance.

This proposal is not in keeping with the character of the Listed Building and forms an overbearing addition in its setting. The staggered and subservient form of the existing care home and its extensions would be unacceptably altered. The proposed development would not preserve and enhance the character of the listed building or its setting. The application is therefore considered unacceptable in terms of its impact on the setting of the adjacent and neighbouring heritage assets identified above and

is considered compliant with policies HER SP1 and HER DM1 of the Arun Local Plan.

The NPPF requires Local Planning Authorities to identify and assess significance of a Heritage Asset that may be affected by proposals (paragraph 195). They should take the assessment into account when considering the impact of proposals in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposals.

Contrary to the guidance in paragraph 194 of the NPPF a detailed Heritage Statement has not been prepared which assesses the impact the development has on the Listed Building,

Paragraph 196 of the NPPF requires the balancing of proposals which affect the significance of Heritage Assets, having regard to the scale of the harm. It is considered that the proposal would cause harm to the significance of the designated Heritage Asset such that the impact can be described as causing less than substantial harm in accordance with paragraph 202 of the NPPF (2021). As such, the public benefits that the development may achieve need assessment, along with the contents of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

It is therefore necessary to consider the public benefits that the development may achieve. These include:

- Providing much needed care home accommodation.
- Creating construction jobs.
- Creating additional employment.

It is considered that these benefits do not sufficiently outweigh the harm caused by the proposal as set out above and the proposal is therefore not compliant with the NPPF.

Impact on Conservation Area

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the Local Planning Authority to have special regard for the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. Paragraph 194 of the National Planning Policy Framework (NPPF) requires such information to be provided in order to assess the impact of the proposal upon these assets. This information has not been provided and therefore a full Heritage Impact Assessment cannot be carried out.

However, the relevant Local Plan policy for assessment of the impact on the character and appearance of the Conservation Area is policy HER DM3 which states planning permission will normally be granted for proposals within or affecting the setting of a Conservation Area provided that (a) new buildings and structures acknowledge the character or their special layout, (d) unsympathetic features are removed, (e) it retains historically significant boundaries and elements of the area's established pattern of development, character and historic value and (f) that proposals do not harm important views into, or out of or within the Conservation Area.

Policy HER SP1 requires Conservation Areas to be given the highest level of protection and to be conserved and enhanced in a manner appropriate to their significance and development that is likely to prejudice their setting should be refused.

Littlehampton East Street Conservation Area is principally formed of the historic collection of buildings which comprise the north and part of the south sides of Church Street. The buildings vary in construction date, ranging from the early 18th century church and cottages to the 19th and early 20th century villas and terraces. However they are of a commensurate scale and form and many share a commonality of

materials, creating a high quality consistent historic townscape. The buildings also form an important intact collection illustrating a key historic development phase of the town which has otherwise been subject to large areas of piecemeal re-development.

The development would be visible from East Street, at its junction with the new link road and from the access road to the police station and The Green Lady public footpath to the west. The existing building currently forms a prominent key marker in the street scene at the eastern approach to the Conservation Area. The building is currently larger than the more domestic older style dwellings to the east, but is not overly dominant in respect of the buildings beyond and does not adversely affect views into the Conservation Area.

The existing building relates positively in character and form with the surrounding built characteristics of the Conservation Area. However the bulky, continuous third floor proposed when combined with its footprint and height would create an overly large development which would appear visually jarring in the street scene, overly dominant, unacceptably reducing the variation in built form within the site and would fail to satisfactorily address this important junction.

The proposed extension fails to contribute to the special character or appearance of the Conservation Area and is insensitive in its setting and does not retain or emphasise qualities of the existing building or streetscape contrary to policy HER DM3 (a)(b) and (f) in that the setting of the Conservation Area would be enhanced by removal of this unsympathetic structure.

A detailed Heritage Statement has not been prepared to assess the impact the development has on the Listed Building and its setting in conflict with paragraph 194 of the NPPF.

With regard to Paragraph 205 of the NPPF the main consideration is the indirect effect that the proposed extension could have on the appreciation of the significance of the identified nationally and locally listed buildings and their settings and the setting of the Conservation Area. As discussed above the proposal would not enhance or better reveal the heritage assets. It would serve to obscure and reduce views and appreciation of them.

In accordance with para.195 of the NPPF which states that Local Planning Authorities should take account of any necessary expertise, the Conservation Officer has been consulted and he has commented that the bland facades and the overlarge scale, massing and form of the extensions will be visually discordant and overbearing in relation to the historic building; made even worse with the additional proliferation of pVCU windows. As such the proposals will also detract materially from the character and appearance of the Conservation Area.

The proposal has not taken account of the policy objectives set out in paragraph 197 of the NPPF by failing to enhance the significance of the heritage assets that may be affected by the application proposals. The conservation of the designated Heritage Assets has not been given sufficient weight In conflict with paragraph 199 of the NPPF. The proposals have not sought to minimise and mitigate the impact of the proposals on the significance of the designated Heritage Assets or make a positive contribution to local character by enhancing the setting of the heritage assets as required by para 197(c) of the NPPF which states Local Planning Authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Car Parking

The proposal will result in additional car parking demand from employees and visitors and no detail has been provided to demonstrate whether the existing car parking provision is sufficient to cope with this increased demand. Businesses are obliged to minimise their effect on the environment. Arun Parking Standards 2020 states at para 4.2 that in support of this obligation and in line with West Sussex

Transport Plan businesses should promote sustainable travel behaviour by encouraging employees to travel by non car modes and reduce the number of single occupancy car journeys. The amount of parking should be based on an analysis of staff/visitors of the site including shift patterns. It is the responsibility of the developer to provide evidence that adequate facilities are provided on site for the proposed use, including cycle parking and storage facilities.

The proposal does not accord with policy TSP1 of Arun Local Plan in that it has not been designed to reduce the need to travel by car. The site is also located in an area where there are peak demands for parking associated with drop off and pick up times of local schools and it is not clear that any demand resulting from the extension would not correspond with these times. However County Highways have raised no objection on highway safety grounds and this lack of detail does not therefore form a reason for refusal.

Energy Efficiency

Policy ECC SP2 requires all new residential development to be energy efficient and to demonstrate that energy efficiency measures are included together with renewable and low carbon energy supply systems.

It has not been demonstrated that the development will provide any improvement to the energy performance of the existing buildings on the site. The proposal would not therefore accord with policy ECC SP2 of Arun Local Plan, but incorporation of appropriate measures could be conditioned.

Biodiversity

Policy ENV DM5 (Development and biodiversity) of Arun Local Plan requires developments to seek to achieve a net gain in biodiversity and incorporate a range of ecological enhancements.

No information has been submitted with application in this respect. However installation of bird boxes could be conditioned to ensure compliance.

Conclusion,

The proposed development would not be acceptable in terms of residential and visual amenity and impact on heritage assets and conflicts with policy. It is therefore recommended for refusal for the following reasons.

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

Contributions required in respect of libraries and fire and rescue totalling £2,541 could be secured by Section 106 Agreement. No draft or agreement has been submitted or signed and the proposal conflicts with policy INF SP1 of the Arun Local Plan and paragraphs 62-64 of the National Planning Policy Framework .

RECOMMENDATION

REFUSE

- 1 Given the height, position, bulk and design of the proposed extension it would not be subservient and would appear as a prominent and obtrusive form of development in the locality and would comprise an unneighbourly form of development which would be detrimental to the residential amenities of neighbouring occupiers and the character and amenities of the surrounding residential area, contrary to policies H DM2, D DM1, D DM4, DSP1 and QE SP1 of the Arun Local Plan and the Arun Design Guide.
- 2 Given the layout, form, scale, height, detailing and relationship with adjacent buildings the proposal would be prejudicial to the appearance and character of the East Street Conservation Area and the setting and character of the Listed Building in conflict with policies HER DM1, HER DM3 and HER SP1 of the Arun Local Plan and the NPPF.
- 3 In the absence of a signed Section 106 agreement in respect of library and fire contributions the proposal conflicts with policy INF SP1 of the Arun Local Plan and paragraphs 62-64 of the National Planning Policy Framework.
- 4 **INFORMATIVE:** Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and determining the application within a timely manner, clearly setting out the reason(s) for refusal, allowing the Applicant the opportunity to consider the harm caused and whether or not it can be remedied by a revision to the proposal. The Local Planning Authority is willing to meet with the Applicant to discuss the best course of action and is also willing to provide pre-application advice in respect of any future application for a revised development.