

PLANNING, DESIGN AND HERITAGE STATEMENT

25 RIVER ROAD, LITTLEHAMPTON BN17 5BZ

**WHALEBACK**

The Old Bank
257 New Church Road
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Site	25 River Road, Littlehampton
Project	Full Planning
Applicant	Hall Homes Ltd
Our Ref	W2125
Date	May 2021
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Contents

Contents.....	2
Introduction.....	3
Site and Surroundings	3
Development Proposal	4
Relevant Planning History	5
Planning Policy Framework.....	6
National Planning Policy Framework	6
Arun Local Plan (2018)	6
Littlehampton Neighbourhood Plan (2014)	7
Planning Appraisal	7
Principle of Development	7
Design and Heritage Considerations	8
Standard of Accommodation	9
Impact on Neighbouring Amenity.....	10
Transport and Highways Impacts.....	12
Environmental Sustainability and Renewable Energy	13
Flood Risk	13
Biodiversity and Landscaping.....	15
Community Infrastructure Levy / S106 Planning Obligations.....	15
Conclusion	15
Engagement with the Local Planning Authority.....	16

Introduction

1. Whaleback Planning & Design is instructed by the applicant to prepare and submit a full planning application to Arun District Council for the demolition of existing car garage (B2) and erection of 2no. residential buildings comprising 5no. flats (C3) with associated works.
2. This Planning Statement describes the application site and its surroundings, the development proposal, the planning history of the site and the relevant planning policy framework. A planning appraisal is provided to consider the merits of the application followed by a conclusion.

Site and Surroundings

3. The application site relates to a single-storey detached car mechanic garage on River Road within the River ward of Littlehampton. The site has an L-shaped footprint with two road frontages on River Road and Terminus Place. The lawful use of the building is B2 (industrial) albeit the site has been vacant for some time, as the previous occupiers were unable to sustain the car garage use due to market conditions.



The application site- existing site layout

4. The building has a single-storey render façade with a corrugated pitched roof. Vehicular access is achieved via River Road with a further car parking area accessed off Terminus Place.



The application site- Terminus Place frontage

5. The River Road street scene is characterised by two-storey terraced and semi-detached dwellings to the north, and modern houses and flat blocks to the south. The material palette is mixed, comprising render, brickwork, slate tiles, clay tiles and upvc fenestration.
6. The Terminus Place street scene is characterised by two-storey terraced dwellings to the east and a block of flats (Arun Court) to the north.
7. Purbeck Place adjoins the application site to the west; comprising Victorian terraced dwellings whose gardens back onto the application site.
8. The application site lies within the River Road Conservation Area. There are no Listed Buildings within close proximity of the site. The building lies within Environment Agency Flood Zones 2 & 3.

Development Proposal

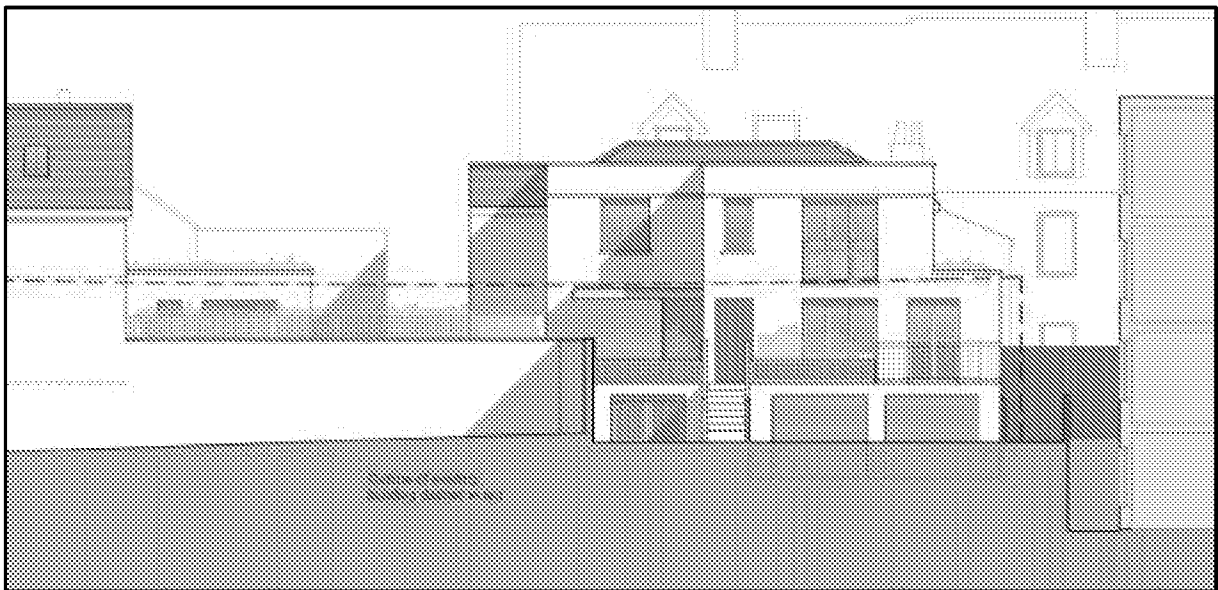
9. Planning permission is sought for the demolition of the existing car garage and the erection of 2no. two-storey residential buildings comprising 5no. flats. The design proposal has been revisited and re-evaluated following the refusal of application LU/126/19/PL. The scale of the development has been reduced significantly, the design has been much-improved and the technical issues have been fully considered and addressed.
10. The building fronting the River Road street scene (hereon referred to as the River Road building) would have a two-storey pitched roof form with parapet, containing 1no. two-bedroom flat (Unit 1) and 1no. one-bedroom flat (Unit 2). Unit 1 would have a private garden to the north. Unit 2 would

feature a front balcony. Two car parking spaces, cycle storage and refuse/recycling would be located at lower ground floor level.



Proposed River Road building- street scene elevation

11. The building fronting the Terminus Place street scene (hereon referred to as the Terminus Place building) would have a two-storey form with a part shallow-pitched, part flat roof form containing 1 no. two-bedroom maisonette (Unit 3), and 2 no. one-bedroom flats (Units 4 & 5). Car parking, cycle storage and refuse/recycling would be located at lower ground floor level.



Proposed Terminus Place building- street scene elevation

Relevant Planning History

12. **LU/126/19/PL:** Demolition of the existing garage building (B2 industrial use) and redevelopment of the site providing 9 no C3 residential units. Refused 27/09/19.

Planning Policy Framework

13. Planning and Compulsory Purchase Act 2004 Section 38(6) requires local planning authorities to determine planning applications in accordance with the development plan, unless other material considerations indicate otherwise.
14. The Development Plan currently in force across the area relevant to the application site currently consists of the following adopted plans:
 - National Planning Policy Framework (2019)
 - Arun Local Plan (2018)
 - Littlehampton Neighbourhood Plan (2014)
 - Conservation Areas SPG (2000)
 - Parking Standards SPD (2020)

National Planning Policy Framework

15. A presumption in favour of sustainable development is found at the heart of the NPPF, for both plan-making and decision-taking, defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
16. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): economic, social and environment.
17. For decision-taking this means approving applications that accord with up-to-date policies without delay; or where policies are absent, silent or out-of-date, granting permission unless the Framework provides clear reasons for refusing a proposal in a particular location or any adverse impacts of permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Arun Local Plan (2018)

18. The Arun Local Plan (2011-2031) was adopted on 18th July 2018. The Plan sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011- 2031. The Arun Local Plan will be used to guide decisions on planning, development and regeneration activity over this period including many other decisions shaping corporate investment plans and strategies, as well as those from external providers, delivering services and infrastructure to the local community.
19. The policies relevant to the assessment of this application are:
 - **Policy SD SPI** - Sustainable Development;
 - **Policy SD SP2**- Built-up Area Boundary;
 - **Policy D SPI** - Design;
 - **Policy D DMI** - Aspects of Form and Design Quality;

- **Policy D DM2-** Internal Space Standards;
- **Policy ECC SP2-** Energy and Climate Change Mitigation;
- **Policy T SPI-** Transport and Development;
- **Policy HER DM3-** Conservation Areas;
- **Policy ENV DM5-** Development and Biodiversity;
- **Policy W DM2-** Flood Risk.

Littlehampton Neighbourhood Plan (2014)

20. The Littlehampton Neighbourhood Plan was 'made' in November 2014. The Plan aims to ensure that development is delivered in a way that will benefit the whole community. Development must encompass a wide range of needs including: housing, employment, community and leisure facilities in order to sustain the Town and its residents. The Neighbourhood Plan aims to provide a framework for how development should look; what it should accomplish and where it is best located.

Planning Appraisal

21. The main considerations of the application relate to the principle of the development, the design and impact on the Conservation Area, the standard of accommodation proposed, the subsequent impact on neighbouring amenity, transport and flooding issues.

Principle of Development

22. The lawful use of the existing building is a car mechanics garage (B2) and the proposal seeks to convert the site to a residential use. Policy EMP DMI of the Arun Local Plan seeks to protect and enhance existing employment sites. The policy states that changes of use from B use classes will not be permitted unless:

'a. It is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use - using a methodology to be agreed by the District Council at pre-application advice stage; or

b. The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.'

23. The Council will require evidence that the site has not been made deliberately unviable, that marketing has been actively conducted for a reasonable period of time and that alternative employment uses have been fully explored.

24. The application is accompanied by a letter from the commercial agent, submitted with application LU/126/19/PL. Feedback from prospective buyers of the site concluding that the site was not suitable for a continued B2 use for the following reasons:

- The building is in a poor state of repair;
- The cost to bring it in line with modern day standards would be unviable;
- Advancements in automotive technology requiring special equipment are only available at main dealerships;
- Lack of visibility and presence- most people are unaware of its location;
- The residential location of the site is likely to generate noise complaints;
- The exorbitant rateable value of the property has deterred potential occupiers.

25. Given the evidenced marketing of the property and subsequent lack of interest, which has remained the case to the present day and exacerbated by current market conditions, it has been adequately demonstrated that the property is no longer viable in its current use in accordance with policy EMP DMI of the Local Plan. This conclusion was supported by the LPA in the determination of application LU/126/19/PL. The delegated report states:

'Given the submitted evidence it is considered that it has been satisfactorily demonstrated that the existing property is no longer viable in its current use, and other uses would be acceptable.'

26. The proposal would create a net gain of five new dwellings within the settlement boundary of Littlehampton, where the principle of residential development is supported and encouraged under policy SD SP2 of the Local Plan, subject to other material planning considerations.
27. Arun District Council is unable to demonstrate a five-year housing land supply. As such, the presumption in favour of sustainable development set out in paragraph 11 of the NPPF applies.
28. NPPF paragraph 11(d) directs decision-makers to apply a presumption in favour of sustainable development if the most important policies for determining the application are found to be out-of-date because the LPA cannot demonstrate a five-year supply of deliverable housing sites. In these circumstances, applications involving the provision of housing should be granted permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
29. The Council's current land supply is a substantial shortfall which is a material consideration to support the Government's objective of significantly boosting the supply of homes. The scale or extent of the shortfall in the LPA's housing land supply is material to this appeal as confirmed in *Phides Estates (Overseas) Ltd v SSCLG [2015] EWHC 827 (Admin)*. The current supply position and under-delivery set out in the Housing Delivery Test is significantly below the 5-year requirement. The scale of this deficiency must be given due weight in the planning balance.
30. The development of the site to provide five high-quality homes within a sustainable location within the built-up area boundary of Littlehampton is acceptable in principle and supported by local and national planning policy – with additional weight in support given the presumption of paragraph 11(d).

Design and Heritage Considerations

31. Policy D SPI of the Local Plan states that all development proposals should seek to 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.
32. Policy HER DM3 of the Local Plan states that development within Conservation Areas will be permitted where new buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and spacing between buildings.
33. The existing garage building is single-storey and set back from the established building line of adjoining properties. The site is under-utilised as a relatively large land parcel within the Conservation Area, and a sensitive design approach has been curated to optimise the potential of the site, whilst respecting the townscape of the River Conservation Area.

34. The existing building harms the character and appearance of the conservation area and its removal and replacement with a good quality building weighs positively in the planning balance.
35. The proposed development would comprise two separate buildings that would have their own respective frontages onto the River Road and Terminus Place street scenes. This arrangement would be reflective of the neighbourhood, creating an active frontage and built form that would be cohesive with the urban grain of the area. The site layout would incorporate hard and soft landscaping features to the front boundary, creating a meaningful sense of place and retaining the building lines of adjoining properties.
36. The form and scale of the River Road building would be two-storey (with parking at lower ground floor level) with a pitched roof and parapet detailing. The proposed façade and general style of the building would be in keeping with the character of the area and the material palette is prevalent within the street scene.
37. The Terminus Place building would have a part-pitched, part flat-roof form to reflect the varied form of Arun Court and the surrounding cottages which provide context to the street scene. The building height would be much lower than the adjoining Arun Court, allowing for a more sympathetic relationship with the historic cottages within the area. The façade detailing and material palette would match that of the River Road building.
38. The separation of the buildings successfully addresses the constraints of the site whilst providing a high-quality and engaging environment that is reflective of the neighbourhood character. The proposal is a much more respectful scale compared to the application LU/126/19/PL, allowing for the provision of space around it and assimilating the height of neighbouring properties.
39. The proposal represents high-quality architecture, effective site layout and landscaping, and appropriate proportions and density to achieve a development that would be sympathetic to local character and historic townscape. The development is therefore in compliance with Local Plan policies D SPI, D DMI and HER DM3.

Standard of Accommodation

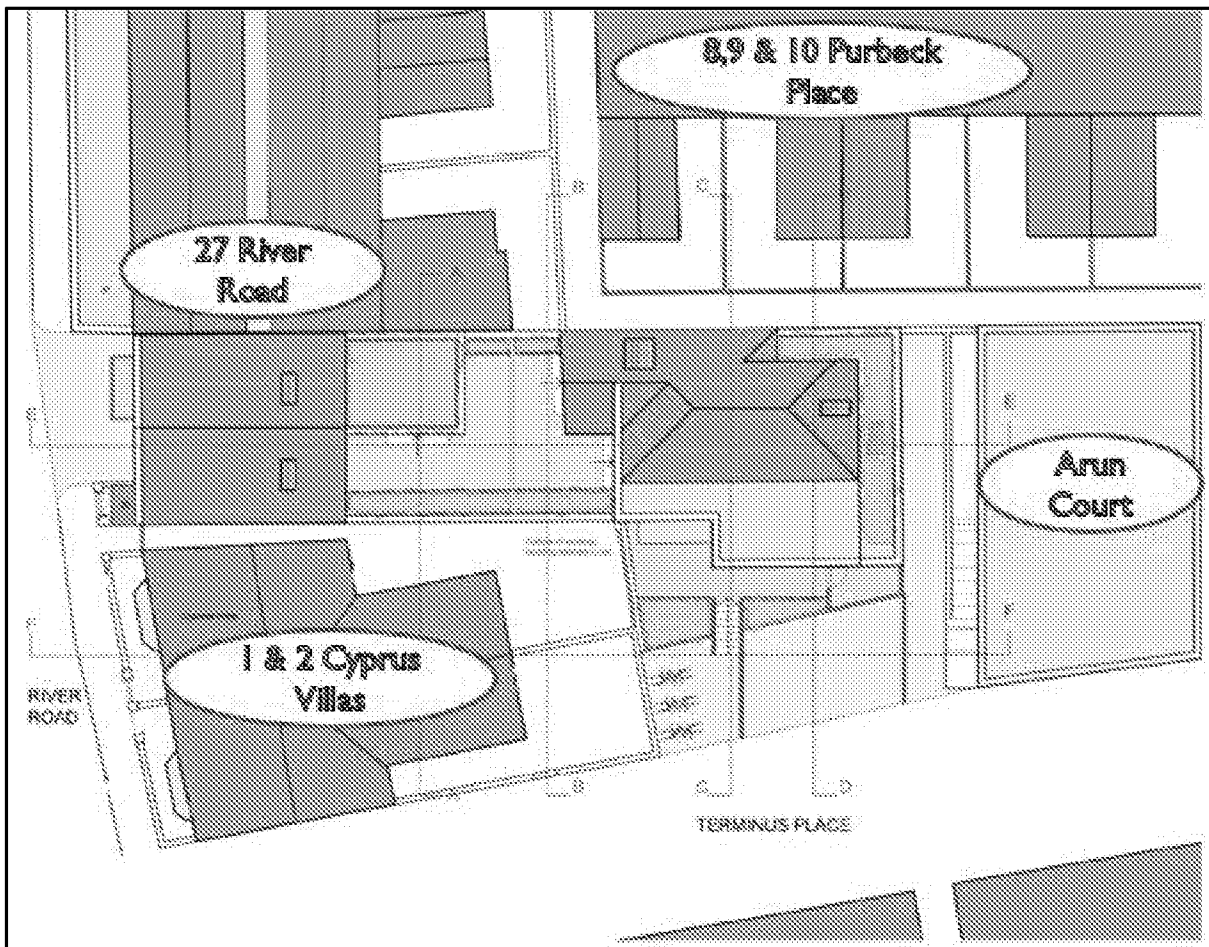
40. Paragraph 127 of the NPPF states that a high standard of amenity for future users should be achieved in new residential development. Policy D DM2 of the Local Plan states that the LPA will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs. The nationally described space standards will provide guidance.
41. Each of the proposed residential units would comply with or exceed the nationally described space standards based on their intended occupancy. The proposed floor areas for each unit are set out in turn as follows:
 - **Unit 1** (two bedrooms, three bedspaces): 62m²
 - **Unit 2** (one bedroom, two bedspaces): 57m²
 - **Unit 3** (two bedrooms, three bedspaces): 71m²
 - **Unit 4** (one bedroom, one bedspace): 42m²
 - **Unit 5** (one bedroom, two bedspaces): 51m²
42. The proposed layout of each unit offers an open-plan kitchen, dining and lounge space, maximising the circulation space within each dwelling. Every habitable room would feature a full-sized window,

providing ample levels of daylight. The form, orientation and fenestration arrangement of the buildings provides a coherent, unrestrained and practical layout.

43. Units 1 and 3 would feature a private garden providing private external amenity and play space. Units 2 and 5 would feature a private balcony. The site is well located to the riverfront, Beach Green, Harbour Park and the seafront for recreational activities that would enhance future residents' quality of life.
44. Overall, the proposal represents a very good standard of accommodation for future residents in accordance with policy D DM2 of the Local Plan and the core principles of the NPPF.

Impact on Neighbouring Amenities

45. Policy D DMI(3) of the Local Plan states that development proposals should have minimal impact on users and occupiers of nearby properties by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise/disturbance.
46. The site is located in a dense residential area that adjoins the boundary of several properties. The adjoining properties are 1 & 2 Cyprus Villas to the east, the flats within Arun Court to the north, no's 8, 9 & 10 Purbeck Place to the west, and 27 River Road to the south-west. The impact on each of these properties is addressed in turn.



Neighbouring properties

1 & 2 Cyprus Villas

47. The main bulk of River Road building as proposed would not exceed the existing rear building line of 2 Cyprus Villas, set away from the side elevation of this building. The siting of the proposed building would retain a considerable separation distance to this property, thus no undue overshadowing or sense of enclosure would occur to the windows or gardens of these properties. The single-storey element on the rear of the River Road building would be limited in height, and the boundary treatment between the application site and 2 Cyprus Villas would shield any inter-looking at ground floor level. The layout would be compact, in keeping with the density of the neighbourhood.

Arun Court

48. The proposed Terminus Place building would largely sit within the footprint of the existing garage building, which currently obscures some rear windows on the southern elevation of Arun Court. The proposed design has been curated to minimise the impact on this building, by drawing the two-storey element of the northern side elevation away from the shared boundary, and omitting windows on this elevation to avoid any overlooking. The light angles from windows within Arun Court are highlighted on drawing no. TA1235/22 Proposed Section EE.
49. The resultant arrangement would not result in significant additional overshadowing or sense of enclosure to Arun Court a degree that would warrant refusal on amenity grounds. Furthermore, the change of use from a car garage to a residential use would be far more compatible in noise amenity terms. The development would alleviate noise and odour disturbance arising from the car garage use.



Light angles from Arun Court rear elevation

8, 9 & 10 Purbeck Place

50. The proposed building would have a minimal two-storey height, sitting below the height of properties along Purbeck Place. There would be a separation distance of approximately 3.6m between the Terminus Place building and the rearmost elevations along Purbeck Place, which is akin to the relationship between other residential properties in the neighbourhood. This relationship already exists to a more significant degree between no's 11 & 12 Purbeck Place and the three storey mass at Arun Court. The submitted drawings indicate the light angles from these neighbouring properties, which is unlikely to have a significantly detrimental impact upon the rear windows and gardens of these neighbouring properties.
51. The proposed windows at ground floor level would be obscure-glazed and largely shielded by the shared boundary treatments along the rear of Purbeck Place. The upper floor window would serve a kitchen area and would also be obscure-glazed to avoid any mutual overlooking to the rear.

27 River Road

52. The proposed River Road building would sit within the rear building line of the adjoining property at 27 River Road, thus there would be no significant overshadowing to the side/rear of this building. The building would obscure the existing side window at 27 River Road, which serves a hallway. To mitigate this impact, a light tunnel will be installed on the roof of 27 River Road to provide natural light to the hallway, which has been agreed with the owner of this property and will be secured via a separate legal agreement which is currently pending.

8 & 9 Terminus Place

53. The Terminus Place building would largely sit within the siting of the existing building. A sufficient separation distance would be retained between these buildings to ensure that no significant overshadowing or overlooking would occur to these buildings.
54. The applicant has engaged openly and collaboratively with all adjoining neighbours to design a scheme that has a minimal impact on their living conditions. The applicant has consulted neighbours ahead of the planning application process, and the final design approach has taken into account comments and requests from them to ensure a cohesive relationship between buildings.

Transport and Highways Impacts

55. The site is located within a highly-sustainable location close to public transport links including Littlehampton train station, bus services, cycling and walking routes.
56. Policy T SPI of the Local Plan requires development proposals to incorporate appropriate levels of parking in line with West Sussex County Council guidance on parking provision taking into consideration the impact of development on on-street parking.
57. The Arun District Council Parking Standards SPG was adopted in 2020, providing refinement to the general WSCC guidance. Based on the Arun parking Standards SPG, the development (located in Parking Behavioural Zone 4) would have a total parking demand of 5 car parking spaces. The proposed site layout would incorporate 4 off-street car parking spaces within the lower ground floor of the buildings. Car parking is also available in local car parks in a short walking distance of the site.

58. Based on current guidance trip generation associated with the proposed use would be significantly lower than the existing car garage. Current guidance suggests that trip generation for a B2 car garage in this location would be much higher compared to movements associated with a residential use. In this regard, parking demand and trip generation would decrease as a result of the proposal.
59. The site is within close proximity of a number of local amenities and services, further reducing dependency on private motor vehicles. The site is a one-minute walk to Littlehampton train station and local bus services, promoting a more sustainable method of transport for future occupiers. The site would be naturally desirable to non-car owners.
60. Secure bicycle storage would also be provided on the lower ground floor of the building in accordance with policy T SPI of the Local Plan. The bicycle storage would be accessed independently, using a key fob security system.

Environmental Sustainability and Renewable Energy

61. The proposed buildings will feature double-glazed windows providing optimal levels of insulation and air-tight construction to avoid heating emissions. Thermal insulation will be installed to building regulations standard to mitigate against heat loss.
62. The building will achieve an energy efficiency standard of a minimum of 19% CO2 improvements over Building Regulations requirement (Class L). This can be secured by planning condition.
63. The building will feature a rainwater harvester and will achieve a water efficiency standard using not more than 110 litres per person per day maximum indoor water consumption. This standard can be secured by planning condition.

Flood Risk

64. The site lies within Flood Zone 3 (High probability of flooding). Policy WDM2 of Arun Local Plan requires that development in flood risk areas is accompanied by a specific Flood Risk Assessment to demonstrate that the development will be safe. A site-specific Flood Risk Assessment is submitted with this application and should be read in conjunction with this statement.
65. The national and local policy framework aim is to steer developments to areas at lowest probability of flooding (i.e. to Flood Zone 1). In accordance with NPPF Table 2 the proposed development is classified as “More Vulnerable”. The Environment Agency’s floodplain map shows the site lies within Flood Zone 3 and NPPF Table 3.
66. There are no suitable sites located within a reasonable radius accessible/available to the applicant of the same scale, type and nature which could be used by this development. Firstly, potentially developable sites (that are not already developed for housing) within a reasonable radius of the application site are within a protected use class, where conversion to residential is resisted in principle in the Local Plan. The application is unique in that supporting evidence accompanying the application demonstrates that this site in particular is no longer viable as a B use class. There is no evidence that this would be the case for other, similar sites within a B use class. Sites that have been confirmed as being suitable for residential development- either through a site allocation or the grant of planning permission- are unobtainable by the applicant as they are already under the ownership of other developers.

67. Secondly, the creation of residential units that are protected by the recent flood defence improvement works carried out to the East Bank area (such as the application site) has been established as being acceptable in the assessment of planning applications LU/44/11 and LU/247/20/PL (47 & 57 River Road). Whilst application LU/247/20/PL was refused on design grounds, the principle of new residential units within the flood zone was considered acceptable. An extract from the officer report reads:

'The Environment Agency have no objection subject to imposition of appropriate pre-commencement conditions. It is therefore considered that if it had been required the proposal would have met the exception test in accordance with the guidance in the NPPF and NPPG.'

68. A significant amount of Littlehampton town centre is located within flood zones 2 & 3 which is widely accepted as appropriate for new residential development (over 5.27m AOD) given the flood defences. Considering sites further afield outside of Littlehampton is not appropriate for a small scale, dense, flattened development such as the proposal which the Local Plan directs to be concentrated within sustainable locations according to the hierarchy of settlements such as the application site.
69. As the LPA is unable to demonstrate a five-year housing land supply, they must look beyond established allocations and settlement boundaries and other more challenging sites. The presumption in favour of sustainable development applies to this case unless the adverse impacts of granting permission would be significant and demonstrable. As outlined below, the development will be safe and protected from flood risk for the duration of its lifetime.
70. The application site lies in a sustainable town centre residential location, where recent developments for housing have been granted in close proximity of the application site. The proposed mitigation measures set out in the design proposals include floor levels 5.27m AOD. The development would not pose an unacceptable risk of flooding to future users, nor would it increase flood risk elsewhere.
71. The public benefit of the development is through the provision of five smaller units of housing with a desirable and sustainable location, where the LPA cannot currently demonstrate a 5-year land supply. A further benefit of the application is to re-use a redundant and unsightly building, enhancing this section of the River Conservation Area and contributing to the wider regeneration of the East Bank area. The construction project would employ local builders and tradespeople, contributing to the local economy.
72. Guidance suggests that finished floor levels must be constructed above the 1 in 200yr AEP of 4.8m AOD in year 2115 flood level. On this basis, the ground floor level (car parking area) will be constructed at 2.8m AOD but all residential accommodation will be located at a level of 5.27m AOD and above.
73. It has been satisfactorily demonstrated that the site would be safe from flood risk throughout the duration of its lifetime. The development of the site for housing is acceptable in principle.
74. Comments from the Environment Agency in relation to previous application LU/126/19/PL state that a revised design proposal should feature habitable accommodation placed at first floor and above, which has been incorporated into the design.
75. The applicant will ensure that all warning and evacuation plans are in place prior to occupation of the dwellings.

Biodiversity and Landscaping

76. The site is covered entirely by concrete hardstanding and contains only overgrown shrubbery with minimal biodiversity value.
77. The applicant would welcome the opportunity to secure biodiversity enhancement through the re-development of this site and invites the Local Planning Authority to secure details of such measures by condition; these could include bird and bat boxes, swift bricks and any other features possible.
78. The proposed plans include an indicative landscaping scheme. The applicant intends to produce a full landscaping scheme upon approval of the application which can be secured by planning condition, to enhance the appearance of the site and add greenery to this section of the Conservation Area.

Community Infrastructure Levy / S106 Planning Obligations

79. The application site is located within CIL charging zone 4 (Within the urban boundaries in the Coastal Area) where there is no CIL charge for a development of this type.
80. The proposal seeks permission for five residential units, therefore no affordable housing contributions are required.

Conclusion

81. The proposed application for the erection of a two-storey building to provide a total of five new dwellings would make a more efficient and effective use of a currently redundant brownfield site. The net gain of five new dwellings in a highly sustainable location would contribute to the District's overall housing supply. The development is strongly supported by local and national planning policy as a significant gain in the overall planning balance that should be attributed weight to the assessment of the application.
82. The site is in a highly sustainable location, in close walking distance from local shops, services, the beach, parks and schools.
83. The sensitively approached design of the building is high-quality and contemporary, reflecting the prevailing character of the River Conservation Area and significantly improving the appearance of the currently disused site. The building design responds to the height, mass and materiality of the local vernacular.
84. The potential constraints of the site have been fully addressed and the proposed design and layout has responded positively to previous concerns raised in application LU/126/19/PL.
85. Future residents will have access to high-quality homes exceeding national space standards, including good outlook and external amenity space. The proposal complies with industry standard levels of daylight and outlook, located within a desirable location.
86. The proposal demonstrates that existing residents in surrounding buildings will be sufficiently protected from amenity-harm. The building would not cause any significant overshadowing or overlooking, therefore safeguarding the living conditions of neighbours.

87. The flood risks associated with the site are fully mitigated through the provision of habitable accommodation being 5.27m AOD. The proposal would not increase flood risk on the site or elsewhere.
88. For the reasons outlined in this report, the proposal represents sustainable development in compliance with national and local planning policy. The Local Planning Authority is therefore respectfully asked to grant planning permission without delay.

Engagement with the Local Planning Authority

89. This planning statement has been prepared to assist the Local Planning Authority in the determination of the application with regard to national and local planning policy. However, in the event that the Local Planning Authority should wish to discuss any element of the scheme, including potential amendments, the applicants would welcome a discussion prior to the determination of the application. Correspondence can be sent to Whaleback Planning & Design via the contact details set out below.

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