

PLANNING APPLICATION FOR THE CHANGE OF USE OF UPPER FLOORS FROM ONE DWELLING TO THREE DWELLINGS

PLANNING STATEMENT

22 BEACH ROAD, LITTLEHAMPTON, BN17 5HT

ON BEHALF OF GOF PROPERTIES LIMITED

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

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1. INTRODUCTION

- 1.1 This Statement has been produced on behalf of GOF Properties Limited and supports a full planning application proposing the change of use of the upper floors of 22 Beach Road from one dwelling to three dwellings.
- 1.2 The following sections of this Statement identify the relevant issues pertinent to the consideration of the application submission and include:
- A description of the application site and the surrounding area, and details of the sites recent planning history
 - A description of the application proposals
 - An overview of relevant planning policy
 - An assessment of the application proposals against the Development Plan, and relevant material considerations such as the NPPF
- 1.3 In accordance with statutory and local information requirements the following supporting material is submitted and will enable a full assessment of the proposals to be undertaken:
- Site Location Plan
 - Existing Floor Plans – Drawing No. 60
 - Proposed Floor Plans – Drawing No. 61
- 1.4 Overall this statement will demonstrate that the proposed development is in accordance with the Development Plan, and other material considerations such as the NPPF, and will show that there are no planning reasons that would prevent planning permission being awarded. It is therefore respectfully requested that planning permission should be granted.

2. SITE DESCRIPTION AND CONTEXT

- 2.1 The application site comprises of the first and second floors of a three storey mid-terrace property located along Beach Road, within the town centre of Littlehampton. In the context of the adopted Arun District Local Plan 1996-2011, the site is located within the designated 'Principal Shopping Area' of Littlehampton. The application site currently comprises of a vacant single dwelling. There is an existing Class A5 unit located on the ground floor of the building, in operation as a Pizza Hut Delivery, granted pursuant to application ref. LU/56/17/PL.
- 2.2 Beach Road comprises predominantly of A1 uses, with a complementary variety of non-retail town centre uses. It is noted that many of the buildings along Beach Road have existing residential accommodation located on the upper floors, above ground floor commercial units.
- 2.3 Existing access to the upper floors is provided from the frontage along Beach Road, with further access to the rear of the building off a rear car park and service yard, named Evans Garden, which is accessed from Arcade Road.
- 2.4 There are bus stops in the vicinity of the site located along Church Road to the north-east, and along Fitzalan Road to the east. Littlehampton Train Station is located approx. 500 metres to the north-west of the site.
- 2.5 Located within the town centre of Littlehampton, which provides a range of services and facilities that serve the local population, the site provides a suitable and sustainable location for the proposed residential use.

3. PROPOSED DEVELOPMENT

- 3.1 The proposal consists of the change of use of the upper floors of 22 Beach Road from one dwelling to three dwellings. The upper floor dwelling is currently vacant.
- 3.2 The proposal will utilise existing access arrangements at the site, as approved under application ref. LU/56/17/PL, with a main entrance from the frontage of the building along Beach Road providing access to the proposed 3 dwellings, as well as an additional entrance providing access to all dwellings from the rear of the building from Evans Garden, which is accessed from Arcade Road.
- 3.3 No further external alterations are proposed as part of this application above those which were approved under application ref. LU/56/17/PL. All further works necessary to convert the upper floors for use as three self-contained dwellings will be internal in nature.
- 3.4 Space for the storage of bins for general waste and recyclables associated with the three dwellings is provided in the rear service yard (as shown on submitted drawing no. 61), located within the demise of the property.

4. RELEVANT PLANNING POLICY

- 4.1 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act, applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

DEVELOPMENT PLAN

- 4.2 The Development Plan for the area consists of the saved policies of the adopted Arun Local Plan 2003 and the Littlehampton Neighbourhood Plan (made November 2014). The adopted Local Plan 2003 is now time expired, however saved policies remain the starting point in the determination of all development proposals in the District, as long as they are consistent with the National Planning Policy Framework (NPPF).

Arun District Local Plan 1996-2011 (Adopted 2003)

- 4.3 The Arun District Local Plan was intended to guide development in the District up to 2011. However, a number of policies were saved beyond this date and currently form the basis for the determination of planning applications within the District, as long as they are consistent with the National Planning Policy Framework (NPPF).
- 4.4 Beach Road is situated within the 'Principal Shopping Area' of Littlehampton although the application site is not located within an identified 'Primary Shopping Frontage'.
- 4.5 **Policy AREA 21** (Re-use of Redundant Floorspace) states that within the Principal Shopping Areas proposals for the reuse of vacant floorspace on upper levels for residential purposes will be permitted provided that:
- The development has no adverse effects for the occupiers of neighbouring properties; and
 - It reflects the need to minimise noise intrusion.

This policy is also clear that a reduction in car parking standards will normally be acceptable provided that there is no adverse effect on the levels of traffic congestion and road safety.

4.6 **Policy DEV23** (Conversion of Existing Buildings to Form a Number of Residential Units) allows for the conversion of a building into residential units within the built-up area provided that:

- The number of units/occupiers can be accommodated in a manner which provides a satisfactory standard of amenities and facilities in relation to:
 - Internal floorspace
 - Sanitary/kitchen facilities
 - Adequate access for all occupiers to external amenity space for storage/collection of refuse, drying clothes, sitting out etc.
 - Adequate pedestrian access can be achieved to each unit without detriment to the amenities enjoyed by other occupiers of the building or adjoining properties.
- It is demonstrated that provision can be or has been made for adequate sound insulation to prevent possible noise disturbance to neighbouring properties and independent units within the building itself.

4.7 **Policy GEN7** (The Form of Development) promotes high quality schemes that promotes sustainable development which reduces the need to travel, particularly by private car, and which does not have an unacceptable impact on adjoining uses. The policy states that development will be permitted provided it *"makes efficient use of land or buildings and, in the case of new residential development, achieves net densities of at least 30 dwellings per hectare"*. In all cases, the District Council will expect a high standard of design and layout.

4.8 **Policy GEN10** (Tidal Flooding and Coastal Defence) states planning permission will be refused for development which would be at an unacceptable risk of tidal flooding and/or where proposals are detrimental to the integrity of tidal defences or the ability to maintain or improve them. In areas identified to be at risk:

- (i) *outside the built-up areas, planning permission will not be granted for new development, or the significant intensification of existing development; and*
- (ii) *within the built-up areas, planning permission will only be granted where the local planning authority is satisfied that appropriate flood and coastal defence and mitigation measures have been provided so that the development will not*

itself be at unacceptable risk and furthermore does not pose an unacceptable risk to existing development in the area.

- 4.9 **Policy GEN12** (Parking in New Development) states that *"the Local Planning Authority will base its consideration of the need for on-site parking provision on its parking standards contained within this Plan. Provision of parking in excess of these standards will not be allowed"*
- 4.10 Table 2 of Appendix 2 of the adopted Local Plan sets out the maximum parking standards for *"Flats, Bedsitters and Hostels"*. It states that for flats with 3 or more habitable rooms *"1 car space and 0.7 car space for visitors and service vehicles (to be provided within the layout near to dwellings)"* and for flats with 2 or less habitable rooms *"1 car space and 0.2 car space for visitor and service vehicles (to be provided within the layout near to dwellings)"*.
- 4.11 Policy GEN12 goes on to state that *"the Local Planning Authority may seek a lower provision than required by the standards for developments proposed in town centres and other areas accessible by other means of transport. In considering the extent of reduced on-site parking provision, the Council will have regard to environmental and highway safety issues, together with the following factors:-*
- (i) the availability, type and proximity of public parking;*
 - (ii) the availability of alternative means of transport;*
 - (iii) potential highway safety problems;*
 - (iv) potential environmental harm arising from parking demand being met elsewhere;*
 - (v) the extent and nature of parking restrictions in force on highways in the vicinity;*
 - (vi) the scale of development proposed; and*
 - (vii) the suitability of "specific use" and "personal" conditions attached to planning permissions."*
- 4.12 **Policy DEV17** requires affordable housing provision on sites of 25 or more dwellings in the built-up area.

Littlehampton Neighbourhood Plan

- 4.13 **Policy 1** of the Neighbourhood Plan reinforces the commitment to the presumption in favour of sustainable development as set out in the NPPF.
- 4.14 **Policy 2** seeks to direct development, including new housing development, within the built-up area boundary of Littlehampton.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework: NPPF

- 4.15 The applicant has given consideration to national policy contained in the National Planning Policy Framework (NPPF). The NPPF outlines some key policies that support aspects of this application. The NPPF identifies that the main purpose of the planning system is to contribute to the achievement of sustainable development, with regards to three dimensions, comprising of economic, social and environmental roles.
- 4.16 A core principle of the NPPF states that *"every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth"*.
- 4.17 Policies in Paragraphs 18 to 219 constitute the Government's views of what sustainable development in England means in practice; the most relevant paragraphs to this application are outlined below.
- 4.18 **Paragraph 14** identifies that at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-making. This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, grant planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.
- 4.19 **Paragraph 23** is clear that LPAs should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.

4.20 **Paragraph 47** encourages Council's to significantly boost the supply of housing. **Paragraph 48** is clear that windfall sites may be counted towards the five-year housing land supply. While **Paragraph 49** is clear the housing applications should be considered in the context of the presumption in favour of sustainable development.

4.21 Transport policies have an important role to play in facilitating sustainable development. Of particular relevance is **Paragraph 32**, stating that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Also of relevance is **Paragraph 39**, noting that local planning authorities should take into account:

- The accessibility of the development;
- The type, mix and use of development;
- The availability of and opportunities for public transport;
- Local car ownership levels; and
- An overall need to reduce the use of high-emission vehicles

4.22 In determining planning applications, Paragraph 196 states that the NPPF is a material consideration. Paragraph 197 reiterates that in assessing and determining proposals "*local planning authorities should apply the presumption in favour of sustainable development*".

Emerging Arun District Local Plan 2011-2031 (Publication Version, October 2014)

4.23 Arun District Council have an emerging Arun District Local Plan 2011-2031 which was submitted to the Secretary of State for examination on the 30th January 2015. The Plan is currently undergoing Hearing Sessions. Once adopted, the new Local Plan will replace the current adopted Local Plan from 2003 and will set out the statutory framework to guide decisions on development and regeneration in the district up to 2031.

4.24 In the context of the emerging Local Plan, the site is located within the designated Town Centre boundary of Littlehampton and is identified as a 'Secondary Shopping Frontage'.

4.25 **Policy RET DM1** states that proposals for the reuse of upper levels for residential, commercial and community uses will be permitted provided that:

- It can be demonstrated that non-retail use of upper floors will not inhibit business needs for workspace storage or retail expansion;
- The development has no significant adverse effects for the occupiers of neighbouring properties; and
- The proposal reflects the need to minimise noise intrusion, including noise insulation measures if required.
- A reduction in car parking standards will normally be acceptable provided that there is no adverse effect on the levels of traffic congestion and road safety.

4.26 **Policy D DM2** (Internal Space Standards) sets out the internal space standards for different types of dwelling. The standards for single storey dwellings/flats (in sq.m) are set out in the table below.

	Essential GIA	Kitchen	Kitchen Diner	Living	Combined	Double	Twin	Single	Bathroom	Storage
1b1p	37	6.2	9.4	12	21	Na	NA	8	3.6	1
1b2p	50	6.8	10.4	13	23	12	NA	NA	4.4	1.5
2b3p	61	7.5	11.2	14	25	12	NA	8	4.4	2
2b4p	70	7.5	12	14.8	27	12	12	NA	4.4	2.5

4.27 **Policy D DM3** sets out the external space requirements for dwellings. The standards for apartments are as follows:

- 1 bedroom – 4 sq.m
- 2 bedrooms – 5 sq.m

4.28 **Policy W DM2** addresses flood risk and requires that the sequential test has been met; a site-specific FRA has been provided; adaptation and mitigation

measures are provided; flood warning and evacuation plans are put in place where appropriate; and new site drainage systems are designed.

- 4.29 **Policy H SP2** requires that schemes of 7 units or less pay a commuted sum towards affordable housing.

5. ASSESSMENT OF PROPOSAL

Principle of the Development

- 5.1 The application proposes the change of use of the upper floors of 22 Beach Road from one currently vacant dwelling to three dwellings, comprising of a one 1-bed dwelling and two 2-bed dwellings. The application site is located within the built-up area of Littlehampton and within an identified 'Principal Shopping Area' of the town centre. It is therefore considered that this is a highly sustainable location for residential development.
- 5.2 Saved Policy AREA 21 of the adopted Local Plan 2003 states that proposals for the reuse of vacant floorspace on upper levels for residential purposes will be permitted provided that the development has no adverse effects for the occupiers of neighbouring properties and it reflects the need to minimise noise intrusion. An assessment of the impact of the proposal on neighbouring amenity is provided below in this Section and it is concluded that the development would be acceptable in this regard. The proposal would increase the number of residential properties in this principal shopping centre location adding to the vitality of the centre as encouraged by saved Policy AREA 21.
- 5.3 The upper floors currently comprise of a vacant dwelling, with an existing kitchen, bathroom, living room, dining room, three bedrooms and a very large room to the rear of the first floor. Due to the large size of the existing dwelling within this town centre location, it is considered that the subdivision of the space to provide one 1-bed dwelling and two 2-bed dwellings would be an efficient use of the space and provide more appropriate housing types for this town centre location. Policy GEN7 of the adopted Local Plan 2003 encourages the efficient use of buildings which provide high quality design and layout, and it is considered that this would be achieved through this proposal.
- 5.4 Further support for the principle of the development is provided under saved Policy DEV23 which states that within the built-up area, planning permission will be granted for the conversion of buildings to form a number of residential units, providing that a series of criteria is met as set out in Section 4 of this Statement. An assessment of the proposal against these criteria is discussed further below in this Section. This policy seeks to ensure that a range of smaller units of living accommodation are available within the built-up area of Littlehampton with appropriate standards of amenity and facilities and it is considered that this would be achieved through this proposal.

- 5.5 There is therefore clear support for the principle of the proposed development within the adopted Local Plan 2003. This is supported by the Littlehampton Neighbourhood Plan which seeks to direct new housing within the built-up area of Littlehampton and encourages smaller households of two bedrooms or less within and on the edge of designated centres.
- 5.6 The reuse of upper floor levels for residential use is also support by Policy RET DM1 of the emerging Local Plan, subject to the following criteria:
- a) It can be demonstrated that non-retail use of upper floors will not inhibit business needs for workspace storage or retail expansion;*
 - b) The development has no significant adverse effects for the occupiers of neighbouring properties; and*
 - c) The proposal reflects the need to minimise noise intrusion, including noise insulation measures if required*
- 5.7 With consideration to these criteria, the fact that upper floors have previously been in residential use is material and with other upper floor residential properties in the vicinity, the proposal is considered to be in-keeping with the character of the area and would not introduce an incompatible use. With regard to not inhibiting business needs for workspace storage or retail expansion, the ground floor of the building is now in operation as a Pizza Hut Delivery A5 use, pursuant to application ref. LU/56/17/PL, and as demonstrated in that application all the functions necessary for the A5 use can be accommodated within the ground floor without requiring any additional floorspace on the upper floors. As already noted, noise and potential impact on neighbouring properties is addressed further below in this Section with noise insulation potentially being provided via an appropriately worded planning condition, if required.
- 5.8 The NPPF and National Planning Practice Guidance places significant weight on the need to meet the housing needs of an area and respond positively to wider opportunities for growth, with Paragraph 47 of the NPPF encouraging LPAs to significantly boost the supply of housing, and Paragraph 49 stating that housing applications should be considered in the context of the presumption in favour of sustainable development.

- 5.9 Paragraph 23 of the NPPF is also clear that LPAs should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites.
- 5.10 The proposal would provide clear benefits for the local area through the increased provision of smaller sized dwellings within a highly sustainable town centre location which would improve the vitality of the centre. The proposal would therefore constitute sustainable development and be in accordance with saved policies of the adopted Local Plan 2003, policies of the Littlehampton Neighbourhood Plan as well as the provisions of national policy and the emerging Local Plan.

Design

- 5.11 With consideration to the criteria of saved Policy DEV23 of the adopted Local Plan 2003 and standards set out in policies D DM2 and D DM3 of the emerging Local Plan, it is considered that the proposed three dwellings can be accommodated at the site in a manner which provides a satisfactory standard of amenities and facilities, representing high quality design and layout.
- 5.12 Emerging Policy D DM2 sets out the Council's current internal space standards for new dwellings. The table below compares the proposed dwellings against the relevant standards for each dwelling type.

	Essential GIA	Kitchen	Kitchen Diner	Living	Combined	Double	Twin	Single	Bathroom	Storage
1b1p	37	6.2	9.4	12	21	N/A	N/A	8	3.6	1
<i>Flat 1</i>	<i>38</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>21.4</i>	<i>N/A</i>	<i>N/A</i>	<i>8.9</i>	<i>3</i>	<i>1</i>
2b3p	61	7.5	11.2	14	25	12	N/A	8	4.4	2
<i>Flat 2</i>	<i>61</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>25.2</i>	<i>12.8</i>	<i>N/A</i>	<i>11.4</i>	<i>3.4</i>	<i>2</i>
<i>Flat 3</i>	<i>66.7</i>	<i>N/A</i>	<i>N/A</i>	<i>N/A</i>	<i>26.4</i>	<i>14.3</i>	<i>N/A</i>	<i>10.9</i>	<i>5.8</i>	<i>2</i>

- 5.13 The table above demonstrates that proposed flats comply almost entirely with the Council's relevant internal space standards for these proposed dwelling types. Only the bathrooms of flats 1 and 2 fall below the specific numerical size standard set out under emerging Policy D DM2, but overall it is considered that the proposal provides a satisfactory standard of internal space.
- 5.14 In terms of external space, private outdoor amenity space is not proposed, however residents will have access to Evans Gardens which would provide communal outdoor space for residents, with bin storage provided as shown on submitted drawing no. 61. Furthermore, there is public open space located in close proximity of the site, including Caffyn Fields located approx. 100 metres to the south of the site. Due to the town centre location of the site, it is considered that the provision of private outdoor amenity space is neither plausible or necessary, and indeed, as noted previously, there are many other upper floor residential properties in the vicinity which by their nature also do not have access to private outdoor amenity space.
- 5.15 As noted earlier in this Statement, existing separate access to the upper floors is provided from the frontage along Beach Road, with further separate access to the rear of the building onto Evans Garden, which is accessed from Arcade Road. These access arrangements were approved under application ref. LU/56/17/PL. The proposal will utilise these existing access arrangements providing front and rear access for all of the proposed dwellings, without impacting on neighbouring properties and commercial units.
- 5.16 Current adopted planning policy does not require the provision of affordable housing on schemes of less than 25 units within the built-up area, such as this site, therefore no contribution is proposed.
- 5.17 It is therefore considered that the proposal would accord with saved policies DEV23 and DEV17 of the adopted Local Plan 2003, relevant provisions of the NPPF, as well as relevant policies of the emerging Local Plan.

Amenity

- 5.18 In terms of noise, the Committee Report for the ground floor change of use application ref. LU/56/17/PL stated that *"the proposal is unlikely to result in unacceptably adverse noise or disturbance beyond what is already present in the locality"*. The upper floors of this building are already in residential use for one

dwelling, and this was the case when the Council made this conclusion. Furthermore, the upper floors of many nearby buildings are also in residential use and these have been deemed to have an acceptable noise environment. It is therefore considered that the subdivision of the existing dwelling for three self-contained dwellings would be acceptable in relation to noise impact. If felt necessary an appropriately worded condition requiring a scheme of noise insulation to be submitted and approved by the LPA prior to commencement of development, and for such noise insulation to be implemented prior to occupation, could be attached to a planning permission to ensure an adequate noise environment is provided for all dwellings.

- 5.19 Details of the extraction flue associated with the ground floor A5 use were approved as part of application ref. LU/56/17/PL and considered to not have a detrimental impact on the upper floor residential accommodation in relation to noise and odour. It is considered that this conclusion can be applied to the proposed subdivision of the upper floors.
- 5.20 The increase in activity brought about by the change from one dwelling to three dwellings is considered to have a negligible impact on the amenity of neighbouring ground floor commercial occupiers and other upper floor residential properties in the area given the existing context of the site within Littlehampton town centre.
- 5.21 It is considered that the proposed dwellings will be designed to a high-quality standard which provides an acceptable level of amenity for future residents, without having a detrimental impact on the amenities of neighbouring residents and occupiers. It is therefore considered that the proposal would accord with saved policies AREA 21, DEV23 and GEN7 of the adopted Local Plan 2003, relevant provisions of the NPPF, as well as Policy RET DM1 of the emerging Local Plan.

Transport

- 5.22 The existing dwelling does not have any designated car parking spaces, and no designated car parking spaces are proposed for this development. However, the site is located within a designated 'Principal Shopping Area' of Littlehampton town centre, which is considered to be a highly sustainable location for residential properties, accessible by sustainable modes of transport, with a wide variety of services and facilities in close proximity. With consideration to saved Policy

GEN12, there is ample public car parking provision and public transport connections in the area with Littlehampton Train Station located approx. 500 metres from the site.

- 5.23 It is considered that the subdivision of the existing large dwelling for three smaller sized households within this highly sustainable location would be acceptable in highway terms and would not have an adverse effect on levels of traffic and road safety in the area. Within walking distance of bus services and Littlehampton Train Station, as well as a wide variety of town centre services and facilities, the proposed development would encourage sustainable lifestyles, promoting the use of sustainable modes of transport and discouraging private car use. It is therefore considered that the proposal accords with saved policies AREA 21, GEN7 and GEN12 of the adopted Local Plan 2003, and relevant provisions of the NPPF, including Paragraphs 32 and 39, as well as Policy RET DM1 of the emerging Local Plan.

Flood Risk Assessment

- 5.24 Like a large portion of Littlehampton town centre, the site falls within an area of Flood Zone 3, defined in the NPPF as land assessed as having a 1 in 100-year or greater annual probability of river flooding or 1 in 200-year year or greater annual probability of sea flooding.
- 5.25 The VolkerStevin Flood Defence Scheme was completed in March 2015 and provides tidal defence wall protection to Littlehampton, including the application site.
- 5.26 The application concerns the upper floors of the building and is therefore not considered to be susceptible to flooding. The upper floors of the unit are already in residential use and the increase in dwellings will not necessitate any extensions or additional floorspace, with only minor internal alterations required to the building. As already discussed, access to these upper floor dwellings will utilise existing access arrangements approved under application ref. LU/56/17/PL. As such it is considered that the proposal would have a negligible impact on flood risk at the site when compared with the existing situation.
- 5.27 It is therefore considered that the proposed change of use and associated internal works to the building would not have an adverse effect on flood risk at this site or in the surrounding area, and that the proposal accords with Policy GEN10 of the

adopted Local Plan 2003, the provisions of the NPPF and NPPG, as well as with
and Policy W DM2 of the emerging Local Plan.

6. CONCLUSION

- 6.1 The proposal is for the change of use of the upper floors of 22 Beach Road from one dwelling to three dwellings, comprising of one 1-bed dwelling and two 2-bed dwellings. The proposed development would be entirely acceptable in this sustainable town centre location and would complement other upper floor residential accommodation in the surrounding area.
- 6.2 The principle of the proposed change of use is supported by relevant saved policies of the Arun District Local Plan 1996-2011 (adopted 2003), as well as with the provisions of the NPPF, NPPG and emerging planning policy contained within the Publication Version of the Arun District Local Plan 2011-2031.
- 6.3 The proposal would provide clear benefits for the local area through the increased provision of smaller sized dwellings within a highly sustainable town centre location, which would improve the vitality of the centre and represent an efficient reuse of currently vacant upper floorspace.
- 6.4 The proposal is designed to a high-quality standard, providing adequate access, internal space and on-site facilities for future residents. The proposal would provide an acceptable level of amenity for future residents, without having a detrimental impact on the amenities of neighbouring residents and occupiers. As demonstrated in this Statement the proposal would also be acceptable in relation to flood risk.
- 6.5 The close proximity to local services and facilities, including public transport, local shopping, health and educational facilities, promotes sustainable lifestyles, encouraging the use of sustainable modes of transport and reducing the need for private car use. As such, given the sustainable location of the site and nature of the proposed development, the proposal would also be acceptable in highway terms.
- 6.6 In light of the above, it is considered that the proposal would accord with the Development Plan and with the emerging Local Plan, and would achieve sustainable development in accordance with national planning policy, providing clear benefits that would far outweigh any adverse impacts associated with the development. The proposal would therefore be in accordance with Paragraph 14 of the NPPF, with a presumption in favour of sustainable development. It is considered that there are no reasons why planning permission should be

withheld, and therefore it is respectfully requested that planning permission is granted.