

Recommendation Report for Planning Permission

REF NO: P/51/22/PL

LOCATION: Land West of Pagham Road
and South of Summer Lane
Pagham

PROPOSAL: Change of use of 12.16 hectares of agricultural land to use for Alternative Natural Green Space/Public Open Space, Allotments & SUDS Scheme (7.48 hectares) and use for a local centre (4.68 hectares) comprising buildings and land for uses falling within Use Classes F1/F2 with vehicular access via existing public right of way numbered 101 and pedestrian/cycle access only via existing public right of way numbered 100 (Summer Lane). This site may affect a Public Right of Way and is in CIL Zone SP2 (Zero Rated) as other development.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION

The application seeks permission for the change of use of an area of agricultural land to use for open space, allotments & drainage (7.48ha) and use for a local centre comprising buildings and land within use classes F1 (Learning & Non-Residential Institutions) & F2 (Local Community Uses) - 4.68ha. The description was amended mid application to remove a reference to a 1/2FE school and instead just refer to use classes F1/F2.

The application is accompanied by a location plan, plan showing the existing access and an indicative block plan which subdivides the site into two areas and also indicates a potential pedestrian access from Summer Lane on the northern boundary. A planning statement has been provided.

No details have been submitted to show how the intended open space, allotments or SUDS scheme would be laid out, or precisely how they would be delivered. No details have been provided to show whether any improvements are required to the means of access, the layout of the local centre, the scale and appearance of the buildings or the landscaping of the site (indicative or otherwise), despite full planning permission being sought.

SITE AREA

12.16 hectares

TOPOGRAPHY

Predominantly flat.

TREES

There are some trees on parts of the west boundary, on parts of the east boundary to the rear of properties in Pagham Road and along the Pagham Road frontage. From the limited details contained in the application, none would appear be affected by the change of use.

BOUNDARY TREATMENT	The application contains no proposal to alter the existing treatment of boundaries.
SITE CHARACTERISTICS	The site is adjacent to the settlement of Pagham and west of Pagham Road. It comprises two former agricultural fields albeit that the north-eastern area has been approved as open space in connection with a housing development and will be formalised through that permission. The two fields are separated from each other by a drainage ditch. Additional agricultural land lies to the west of the site, with Pagham Harbour situated further to the south-west. The north boundary of the site is defined by Summer Lane and the southern by a public right of way (Footpath 101).
CHARACTER OF LOCALITY	Despite its proximity to Pagham, the site has a rural feel due to the large expanse of open countryside to the west. Pagham village hall and car park are adjacent to the east boundary and there is residential development beyond, to the east of Pagham Road, and on parts of Summer Lane to the north. Church Barton House and farm lies to the west of the site. Bus stops are situated to the east on Pagham Road.

RELEVANT SITE HISTORY		
P/167/21/RES	Approval of reserved matters (appearance, layout, landscaping and scale) following outline planning permission P/140/16/OUT for the erection of 375no. dwellings, together with public open space, play space, drainage, parking and associated infrastructure, landscape, ancillary and site preparation works, with access off Pagham Road (alternative to P/153/21/RES). This site may affect a Public Right of Way.	
P/155/21/RES	Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent P/140/16/OUT for the 'local centre' parcel which comprises of retail, community and commercial uses, 20 No residential apartments and a 70 bed care home.	ApproveConditionally 31-05-22
P/6/22/PL	Material change of use of 7.5 hectares of agricultural land to a public park comprising public allotments and open space. This application is a Departure from the Development Plan, affects a Public Right of Way and is in CIL Zone 5 (Zero Rated) as other development.	Decline To Detm 23-02-22
P/57/21/PL	Change of use of 12.16 hectares of agricultural land to use for Alternative Natural Green Space,	Withdrawn 20-07-21

Public Open Space, Allotments & SUDS Scheme (7.48 hectares) and use for a local centre comprising a library, health, child care facilities and a 1/2 FE Primary School. This site affects a Public Right of Way & is in CIL Zone SP2 (Zero Rated) as other development.

P/35/21/PL	Material change of use of land from agricultural use to use for open space. This application is in part a Departure from the Development Plan, affects a Public Right of Way & is in CIL Zone 5 (Zero Rated) as other development.	Decline To Detm 31-03-21
P/1/21/PL	Material change of use of land from agricultural use to use for open space. This application is in part a Departure from the Development Plan, affects a Public Right of Way & is in CIL Zone 5 (Zero Rated) as other development.	Refused 04-03-21 Appeal: Dismissed 19-07-21
P/70/19/RES	Approval of reserved matters following outline consent P/58/15/OUT for 90 No. dwellings. Also seeking to address the terms of planning conditions 6 (Phasing), 8 (ecology), 9 (Surface Water), 12 (Vehicular Access), 15 (Parking), 18 (Travel Plan), 20 (Landscape Management), 24 (Parking Control), 25 (Dwelling Parking) and 26 (Materials).	ApproveConditionally 28-02-20
P/140/16/OUT	Outline application for access only - mixed use development comprising of up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route & other community uses including public open space & allotments with some matters reserved.	App Cond with S106 22-11-18
P/58/15/OUT	Outline application with some matters reserved for the erection of 90 No. dwellings with associated access & open space. This is a Departure from the Development Plan.	App Cond with S106 30-09-16

P/58/15/OUT and P/70/19/RES relate to the part of the site in the north-western corner which has been approved as Public Open Space in association with a development of 90 dwellings.

P/140/16/OUT relates to the whole of the site, excluding the land subject to P/58/15/OUT & P/70/19/RES. Reserved matters for the local centre including 20 residential flats and a 70 bed care home has been granted by P/155/21/RES. A reserved matters application for the associated 375 dwellings is currently with the council (P/167/21/RES).

P/1/21/PL relates to the part of the site between the drainage ditch and Summer Lane and to another parcel of land to the north of Summer Lane. It was dismissed on appeal in July 2021. The appeal failed as the proposal would prejudice the delivery of housing, and as a result would conflict with the Arun Local Plan policies which identify the amount and location of new housing in a comprehensive planned manner, together with supporting infrastructure. The Inspector stated that whilst the proposal may find support from other Local Plan policies, the most important policies in the development plan relate to the delivery of housing which it conflicts with.

P/35/21/PL and P/6/22/PL were resubmissions of P/1/21/PL which proposed very minor changes and so the council declined to determine these applications. P/57/21/PL was withdrawn by the applicant.

REPRESENTATIONS

Pagham Parish Council state no objection.

One letter of support stating that this is a better idea than the approved scheme for 400 houses. One objection from the Sussex Ornithological Society on the grounds that it does not include the mitigation secured by P/140/16/OUT in respect of Brent Geese which forage the site.

COMMENTS ON REPRESENTATIONS RECEIVED:

Noted.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

NATURAL ENGLAND - require the following further information to determine impacts on the designated Pagham Harbour Special Protection Area:

- demonstration that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by Arun DC (i.e., provide a Habitats Regulations Assessment).
- consideration of how any impacts associated with the loss of Functionally Linked Land will be avoided and/or mitigated; and
- further information outlining how the Sustainable Drainage System (SuDS) will be suitably designed.

State that without this, Natural England may need to object to the proposal.

WSCC EDUCATION - object due there being no provision for a 1FE School with room to expand to add another 1FE.

WSCC HIGHWAYS - request more information to determine the impact. This should take the form of a

transport statement, road safety audit and drawings showing improvements to the access.

WSCC PUBLIC RIGHTS OF WAY - request more information in respect of impact on Public Right of Way (PRoW) 101 which is where the access is proposed.

ADC DRAINAGE ENGINEERS - no objection and recommend no conditions at this stage. State any alteration to existing land drainage systems, including connection to, culverting or bridging existing watercourses will require Ordinary Watercourse land Drainage Consent.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted except as discussed below:

WSCC EDUCATION - the applicant amended the description since these comments to now specify F1/F2 uses rather than a 1/2FE school thus leaving it open to meet the County's requirements for at least 2FE provision.

POLICY CONTEXT

Designations applicable to site:

Flood Zone 1.

Part of the north-western corner is predicted to be FZ3a by 2111.

TPO/P/3/19 (on the Pagham Road frontage just north of the access).

Built-Up Area Boundary.

Pagham Harbour Zone B; and

CIL Zones 1 & 4.

DEVELOPMENT PLAN POLICIES

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

ECCSP1	ECC SP1 Adapting to Climate Change
ENVSP1	ENV SP1 Natural Environment
ENVDM1	ENV DM1 Designated Sites of Biodiversity or geographical imp
ENVDM2	ENV DM2 Pagham Harbour
GISP1	GI SP1 Green Infrastructure and Development
HSP1	HSP1 Housing allocation the housing requirement
HSP2	H SP2 Strategic Site Allocations
HSP2A	HSP2a Greater Bognor Regis Urban Area
HWBSP1	HWB SP1 Health and Wellbeing
INFSP1	INF SP1 Infrastructure provision and implementation
OSRDM1	Protection of open space,outdoor sport,comm& rec facilities
OSRSP1	OSR SP1 Allotments
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TSP1	T SP1 Transport and Development

PLANNING POLICY GUIDANCE:

NPPDG	National Design Guide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

SUPPLEMENTARY POLICY GUIDANCE:

SPD13	Arun District Design Guide (SPD) January 2021
PDS	Pagham Parish Council's Village Design Statement by PaghamPC

POLICY COMMENTARY

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

Where applicable, Neighbourhood Development Plan's, once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area. There is no Neighbourhood Plan to consider as the emerging Pagham Plan was withdrawn in September 2020.

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 conflicts with relevant Development Plan policies because it would fail to bring forward the housing and the full range of associated infrastructure allocated to the site. In addition, there is potential for harm to wildlife associated with the Pagham Harbour Special Protection Area and no information has been supplied to enable proper consideration of highway safety or the impact on the Public Right of Way (PRoW).

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

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

OTHER MATERIAL CONSIDERATIONS

There are no material considerations in this particular case of sufficient weight to indicate that a decision should be made that is contrary to the Development Plan.

CONCLUSIONS

INTRODUCTION:

The proposal the subject of this application gives rise to three main issues. These are:

- (1) Whether the proposed change of use constitutes a departure from the development plan and, if so, whether material considerations in this particular case indicate that the plan should not be followed.
- (2) Whether the proposal would have an acceptable impact on the Pagham Harbour Special Protection Area; and
- (3) Whether the proposal is acceptable in terms of impacts on local roads and footpaths.

ISSUE (1):

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. The Arun Local Plan (ALP) is the only element of the development plan to provide relevant policies.

The site is designated on the Policies Map of the ALP as part of a Strategic Housing Allocation (ref SD1 Pagham South) and also within the Built-up Area Boundary (BUAB). The key policies that apply are H SP1, H SP2 and H SP2a. ALP policy H SP1 sets out the overall provision of at least 20,000 new homes phased over the plan period. The policy allocates 400 units to the strategic housing site SD1 Pagham South. This is an important part of the strategy of the ALP.

Policy H SP2 requires development proposals within the Strategic Site Allocations to be comprehensively planned and to have regard to a masterplan endorsed by the Council for the respective areas which incorporates high quality imaginative design giving a sense of place and a permeable layout. Policy H SP2a focusses on the "Greater Bognor Regis Urban Area" including Pagham (both SD1 Pagham South and SD2 Pagham North). The policy sets out key design and infrastructure requirements for the two Pagham strategic allocations. The principle of the development of the site SD1 has been established by the grant of two outline planning permissions.

These include P/140/16/OUT and P/25/17/OUT. The former was granted on 22 November 2018 for a mixed used development comprising up to 400 dwellings, a care home, a primary school, and other uses on land south of Summer Lane and west of Pagham Road. The latter was granted on 5 September 2019 for the "erection of up to 65 No. dwellings, access roads, landscaping, open space & associated works" on land at Church Barton House, Horns Lane. The area of the current application does not include the land associated with the Church Barton House permission.

Therefore, beyond the allocation in the ALP, the principle of housing development on this site has been further established by the grant of the outline permissions which together secure permission for up to 465 homes. The applicants for the above applications have clearly shown a commitment to deliver strategic housing on these sites in accordance with the adopted ALP strategy. The proposed change of use of the land to use for open space would be in direct conflict with policies H SP1, H SP2 and H SP2a as it would prevent the delivery of housing and the full range of associated infrastructure allocated to the site.

In support of this application, the applicant included a site plan identifying the northern part of the site as 7.48 hectares of land for alternative natural green space, public open space, allotments and a SUDS scheme and the southern part of the site as 4.68 hectares of land for a local centre comprising use classes F1 and F2. If the proposal was granted permission, the housing developers would have a choice of whether or not to include it in the design of their development. It is clear from the representations made in response to a previous application (P/1/21/PL) concerning part of this site that they do not intend to do so.

Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. The Local Planning Authority cannot demonstrate a five-year supply of deliverable housing sites with the Housing Land Supply (HLS) currently at 2.42 years as per the Authority Monitoring Report (AMR) for 2020/21 published in January 2022. Therefore, paragraph 11d of the Framework is engaged. This leads on to paragraph 11(d)(ii) and the test of whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

The change of use has the potential to deliver some social benefits through the provision of public open space that will support the health and well-being of the existing community (policies HWB SP1, OSR DM1 & OSR SP1). It has the potential to offer some environmental benefits through the protection/enhancement of the natural environment and adaptation to climate change (policies ENV SP1, GI SP1 & ECC SP1). However, it would not provide economic support for local facilities and services, or employment through the construction of new dwellings. Fundamentally, it would fail to ensure a sufficient number and range of homes can be provided to meet the needs of present and future generations. These are the adverse impacts of granting permission, which are considered to outweigh the benefits significantly and demonstrably, particularly when assessed against policies in the Framework as a whole.

Paragraph 60 of the NPPF states that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay". The strategy in the ALP and the grant of outline planning permissions (P/140/16/OUT & P/25/17/OUT) are entirely consistent with the aim in the NPPF of significantly boosting the supply of housing.

The change of use is contrary to these policies and guidance. It would, if implemented, prejudice implementation of the ALP housing strategy and would be contrary to the NPPF taken as a whole. Granting this permission and seeking to obstruct the delivery of strategic housing on the site will result in an even greater shortfall in housing land supply and increase the need to find other sites elsewhere in the District; sites that will be speculative and where strategic infrastructure cannot be planned.

It is material that an application was dismissed on appeal in July 2021 concerning the change of use of the northern part of the current site and another field to the North of Summer Lane (ref P/1/21/PL). This land was in part designated for housing and in part approved for a mix of open space and housing. The inspector agreed with the council that the proposal would prejudice the delivery of housing and conflict with the relevant ALP policies. This new application is for a larger area than this on which a greater number of residential dwellings have been allocated.

The applicant's argument in favour of this being granted is that it is in accordance with the relevant policies of the ALP but in any case, the council has declared that all of the policies of the Arun Local Plan are out of date - and are now subject of a Local Plan review. As per the above discussion, the proposal is not in accordance with those relevant policies that are most important for determining the application. It is only the Local Plan policies that relate to housing that are out of date and this is solely due to the council not being to demonstrate a 5-year NPPF compliant HLS. The council is currently taking steps to increase the current HLS (including reviewing the ALP) and would not wish to hamstring itself further by removing 400 permitted homes from the supply.

It is important to note that the presumption in favour of sustainable development is a presumption of policy only and, even if the presumption applies, it does not displace the requirement to apply section 38(6) of the Planning and Compulsory Purchase Act 2004. In addition, as per para 182 of the NPPF, the presumption does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects) which is relevant in respect of Issue (2).

The change of use constitutes a departure from the development plan and there are no material considerations in this particular case of sufficient weight to indicate that the plan should not be followed. Notwithstanding, it should be noted that there is no objection to the designation of the part of the site in the north-eastern corner as open space since it already has permission for such through P/58/15/OUT and P/70/19/RES.

ISSUE (2):

The site lies in close proximity of the Pagham Harbour Special Protection Area (SPA) which is also a Ramsar site and SSSI. The site is of international importance for certain wild bird species including migratory birds and has a high level of protection in the UK planning system. The site has the potential to affect the interest features associated with the designations on that site.

ALP policy ENV DM1 states any development likely to have an adverse effect on land with the designated features of the site will not normally be permitted. Policy ENV DM2 requires that new development in the Zone B area should create easily accessible new green spaces for recreation and the proposal complies with this aspect. Para 180 of the NPPF states that if significant harm to biodiversity resulting from a development cannot be avoided or mitigated then planning permission should be refused.

The advice of Natural England (and to a lesser extent, the Sussex Ornithological society) is clear that the proposal will lead to a loss of functionally linked land used by Dark Bellied Brent Geese (a migratory bird which visits the SPA) used by them for foraging or roosting. Whilst this impact was accepted by application P/140/16/OUT, this was on the basis of a mitigation strategy which has not been proposed by this application. Natural England state "Whilst we recognise that this proposal does not include residential development, there is still a tangible risk that this proposal could result in a loss of FLL and an adverse impact upon the Pagham Harbour designated sites."

Natural England consider the proposal has the potential to impact the Pagham Harbour site by way of drainage from the proposed drainage scheme. Natural England request an appropriate assessment is carried out as per the Habitats Regulation Assessment to determine the likely impacts and proposes mitigation strategies. However, it is not possible to do this with the information that has been provided and on the basis that the application is being refused for other reasons. The proposal is in conflict with ALP policy ENV DM1 and the NPPF guidance.

ISSUE (3):

ALP policy T SP1 seeks to ensure development provides safe access on to the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport. Schemes should accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, be accessed by high quality public transport facilities, create safe and secure layouts for traffic, cyclists and pedestrians and provide appropriate levels of parking. Policy T DM1 requires new development be located in easy access of established non-car transport modes/routes.

Para 110 of the NPPF states: "In assessing .. specific applications for development, it should be ensured that: (b) safe and suitable access to the site can be achieved for all users". Para 111 states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The Arun Design Guide Supplementary Planning Document (SPD) January 2021 states that, "A

successful movement framework should be easily accessible by all including the young, elderly and those with movement difficulties; and should encourage healthy and sustainable choices, making it as easy to walk, cycle, horse ride or take public transport as it is to drive".

The application states vehicular access will be from the existing Church Barton access at the southern end of the site which is a designated public footpath. A plan is included which shows the location of this and has a photograph of it, but it is not clear whether it requires any improvements. There is no supporting information (Transport Statement, Road Safety Audit) to assess the impact of the proposal on local roads and no information as to the likely impact of the proposal on the public footpath. It is material to note that the scheme approved by P/140/16/OUT was to be accessed by two new vehicular accesses neither of which involved the use of the public footpath.

The application has been subject to comments from both WSCC Highways and WSCC Public Rights of Way that request further information in order to determine the likely impact, but none further has been forthcoming. The proposal is therefore deficient in respect of the information necessary to determine compliance with the relevant policies and the guidance in the NPPF. WSCC Highways have agreed to the councils proposed refusal reason.

OTHER MATTERS:

Planning permission has been granted to develop the land for housing and any approval for alternative uses could not take away that permission. Any alternative permission would simply mean that the landowner has two permissions, either of which they could choose to implement. In this instance, those with an interest in the land have previously objected, making it clear that there is no prospect of the alternative use being implemented.

The granting of permission would not mean that the northern part of the site has use as open space or becomes designated open space. Only a development plan could allocate the site as open space and it would either need to be in use as open space, or be able to be delivered, for it to do so.

SUMMARY:

It is therefore recommended that the application be refused for the following three 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.

RECOMMENDATION

REFUSE

- 1 The change of use of the land to use for open space, allotments, drainage and use for a local centre (use classes F1/F2) does not accord with policies H SP1, H SP2 and H SP2a of the Arun Local Plan and would prejudice delivery of the Local Plan housing strategy, contrary to paragraph 60 of the NPPF.
- 2 Insufficient information has been provided to adequately demonstrate that the proposal would not have an unacceptable impact on the safety of local highways and public rights of way, or whether the residual cumulative impacts of the development on the road network would not be severe. The proposal is lacking in detail in relation to the access and there is no Transport Statement or Stage 1 Road Safety Audit and the proposal is in conflict with Arun Local Plan policies T SP1 & T DM1 and with the NPPF.
- 3 Insufficient information has been provided to demonstrate that there will be no adverse impact on Functionally Linked (habitat) Land for Dark Bellied Brent Geese (which are a qualifying species of the Pagham Harbour Special Protection Area) or that the proposed surface water drainage scheme will not adversely affect water quality within the same Special Protection Area and this is in conflict with Arun Local Plan policies ENV DM1 & ENV DM2 and the NPPF.
- 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.