

Planning Committee – Supplementary agenda

A meeting of the Planning Committee will be held on:

Date: 24 April 2019

Time: 6.30pm

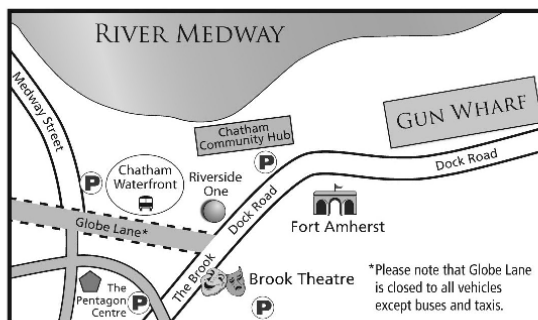
Venue: Meeting Room 9 - Level 3, Gun Wharf, Dock Road, Chatham ME4 4TR

Items

25 Additional Information - Supplementary agenda advice sheet (Pages 3 - 14)

For further information please contact **Ellen Wright, Democratic Services Officer** on Telephone: 01634 332012 or Email: democratic.services@medway.gov.uk

Date: 24 April 2019



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A summary of this information can be made available in other formats from **01634 333333**

If you have any questions about this meeting and you want to speak to someone in your own language please ring **01634 335577**

বাংলা	331780	ગુજરાતી	331782	ਪੰਜਾਬੀ	331784	کوردی	331841	ارو	331785	Русский	332374
中文	331781	हिंदी	331783	Polski	332373	ଏହକ୍‌ଶଫ	331786	فارسی	331840	Lietuviškai	332372

Medway Council

PLANNING COMMITTEE – 24 April 2019

Supplementary Agenda Advice

Page 12 Minute 918 Manor Farm Quarry, Parsonage Lane,
Strood, Rochester

As requested, the Head of Planning has registered a complaint with Environment Agency concerning the mud deposits on the road.

Page 20 Minute 924 249 London Road, Rainham, Gillingham

The following reason for refusal were agreed with the Chairman, Vice Chairman and Opposition Spokesperson

- 1 The proposal represents an overdevelopment of the site due to the number of flats proposed and the limited onsite parking available in a location where prospective occupiers are likely to require a private vehicle. As a result the proposal is likely to lead to overspill parking on neighbouring residential roads where on street parking is already at a premium which will be to the detriment of the amenities of the occupiers of the properties in those neighbouring streets. The proposal is contrary to Policies BNE2 and T13 of the Medway Local Plan, and paragraph 127f of the NPPF.

Page 21 Minute 925 Coronation Bungalow, Cooling Street,
Cliffe, Rochester

The following reason for refusal were agreed with the Chairman, Vice Chairman and Opposition Spokesperson

- 1 Cooling Street is a hamlet with no local facilities, services or public transport and in that respect the proposal for an increase of two dwellings on site would represent an unsustainable form of development completely reliant on the use of the private car. In addition the proposal by reason of its design, layout and appearance would appear as a dominant and cramped form of development out of character with the general street scene which is characterised by small scale properties with long rear gardens. As a result, the proposal represents an overdevelopment of the land, and would have a detrimental and negative impact on the surrounding area and streetscene. The proposal would therefore be contrary to Policies BNE1 and BNE25 of the Medway Local Plan 2003 and represents an unsustainable form of development contrary to the aspirations of the NPPF 2019.

The following reason for refusal were agreed with the Chairman, Vice Chairman and Opposition Spokesperson

- 1 The application property is a mid-terraced dwelling that is not situated in a predominantly mixed-use or commercial area and is of a size suitable for occupation by a single-family unit. The basement rooms would provide limited outlook for the future occupants which would result in an unacceptably poor standard of amenity and living accommodation that future occupiers can reasonably expect to enjoy. The proposal would also have increased and unacceptable impact on the amenities of the occupiers of neighbouring properties by virtue of increased activities and traffic to the area, to the detriment of the neighbouring occupiers and local amenity. The proposal is contrary to Policies H7 and BNE2 of the Medway Local Plan 2003, and paragraph 127f of the NPPF.

The following reason for refusal were agreed with the Chairman, Vice Chairman and Opposition Spokesperson

- 1 The proposed change of use of this family dwelling house would result in the loss of much needed housing in the area, which would compromise the Council's level of existing housing stock. The proposed office use in a predominantly residential area would introduce a use that would be out of character with the residential nature of the area. The proposal would therefore be contrary to Policy H2 of the Medway Local Plan 2003, and the objectives of paragraph 122 of the National Planning Policy Framework 2019.

Recommendation

Amend refusal reason 2 to read as follows:

- 2 The proposed vehicular crossing would adversely affect the health and stability of the existing mature lime tree growing on the highway verge outside 218 Beechings Way. This tree has a high amenity value and forms part of a substantial avenue of trees on Beechings Way. In the absence of a tree report and supporting information, which complies with British Standard 5837:2012, the application fails to demonstrate that there would not be an adverse impact on the lime tree. The proposal therefore conflicts with the objectives of Policies BNE43 and T2 of the Local Plan and Paragraphs 109 and 170 of the NPPF.

Recommendation

Amend s106 list (i) to (v) to read as follows:

- i) Education contribution of £9,054.36 comprising of Nursery £3,093.87 and Primary £5960.49 to Phoenix Junior Academy or Greenvale Infants School
- ii) Green Spaces contribution of £12,695.34 to Chalk Pit and/or Maidstone Road Sports Ground & Great Lines Heritage Park footpath phase 2
- iii) Community Facilities contribution of £1,131.90 to White Road Community Centre
- iv) Health contribution of £2878.16 to Bryant Street Surgery, Kings Family Practice and The Halfway Surgery.
- v) Waste contribution of £956.04 to the provision of brown bins; refuse bags and informational leaflets to all homes, maintenance of on street waste and recycling facilities in Chatham High Street, leaflet production.

Amend condition 1 to read as follows:

- 1 The development hereby permitted shall be begun before the expiration of eighteen months from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

Amend condition 2 to read as follows:

- 2 The development hereby permitted shall be carried out in accordance with the following approved plans:

Drawing numbers 0231-P002 Rev E, 0231-P005 Rev E, 0231-P006 Rev E and 0231-P010 Rev C received on 3 April 2019; and drawing numbers 0231-P003 Rev D, 0231-P004 Rev D, 0231-P007 Rev D, 0231-P008 Rev D, 0231-P009 Rev D, 231-P011 Rev D, 0231-P012 Rev D, 0231-P013 Rev D and 0231-P014 Rev D, 0231-P015 Rev D and 0231-P016 Rev D received on 10 April 2019.

Reason: For the avoidance of doubt and in the interests of proper planning.

Page 50 MC/19/0123

Former Toys R Us, Horsted Retail Park,
Maidstone Road, Chatham

Planning Appraisal

Delete paragraphs 7 and 8 of the 'Principle' section and replace with the following:

The applicant has carried out a sequential assessment which successfully demonstrates that there is no sequentially preferable site within or on the edge of Chatham town centre that is available, suitable and viable that can accommodate the application proposals or a flexible interpretation of them. Whilst the applicant's assessment of more central sites has regard for the development as a whole, It is considered that no sequential sites exist even if the proposals were disaggregated. This includes first floorspace within the Pentagon Shopping Centre which has been identified by the planning consultants acting for the previous owners of the shopping centre. The issues associated with this floorspace, particularly for a modern gym operator, have been raised by UFC Gym's planning advisors and UFC Gym themselves in letters received on 23 April 2019. Having regard to the constraints of that space and the requirements of leisure operators, It is considered that, on balance, the sequential test has been adequately addressed in this instance.

On the basis that the sequential test has been met, the proposed development complies with Paragraphs 86 and 87 of the NPPF and Policies R11, R13 and L2 of the Local Plan.

Delete paragraph 2 of the 'Conclusion and Reasons for Approval' section and replace with the following:

The applicant has undertaken a sequential test and concludes that no suitable or available sites exist in Chatham town centre that would represent a viable alternative site to Horsted Retail Park. That assessment has regard to the need for flexibility; It is therefore accepted that compliance with the sequential approach has been demonstrated.

Page 64 MC/18/1307 Bakersfield Phase 2, Station Road,
Rainham

Recommendation

Add a new condition 28:

- 28 Within 6 months from the date of this planning permission, details of a pedestrian, cycle and emergency vehicles connection link to be no less than 4.5m wide along the eastern boundary of the Bakersfield Phase 1 through the car park court area situated between plots 30 and 31 to the adjoining land known as Woolley's Orchard shall be submitted to and approved in writing by the Local Planning Authority. The approved link shall be constructed in accordance with the approved details prior to the completion of the approved landscaping scheme or at a date to be agreed in writing with the Local Planning Authority and maintained as such thereafter.

Reason: To ensure that the development is sustainable and does not have adverse impact upon the amenities of the future residents and in compliance with Policies BNE2, T1, T3 and T4 of the Medway Local Plan 2003.

Relevant Planning History

A duplicate planning application (MC/19/0797) for the proposed development has been submitted and is currently under consideration.

Representations

A letter addressed to Councillors has been received from the applicant's agent and is attached to this supplementary agenda.

The Planning Agent has also written to the Head of Planning expressing disappointment that planning permission could not be granted, that the Council did not engage in consultation with the applicant and that the second (duplicate) application (MC/19/0797) is not on the agenda for this Committee. The letter asks the Committee to:

- a) Support application MC/18/2864 subject to overcoming concerns from the highway authority; and
- b) Allow officers to determine the new duplicate application (MC/19/0797) under delegated authority, therefore without the need to report the application to Planning Committee.

Officer Response to the Letter Sent to the Head of Planning

The applicant was invited to discuss the highway concerns prior to completing the planning report regarding the current application. The offer was not taken up and instead of amending the plans the applicant's lodged a non-determination appeal.

Consultation is currently taking place on the second application. Whether or not this needs to be reported to Planning Committee depends on the number of representations received contrary to Officer recommendation and/or whether a Councillor requests that the application be considered by Planning Committee. Officers continue to be open to the prospect of entering into discussions to address the highway concerns.

Page 186 MC/19/0086 104 A, B, C Poplar Road, Strood,
Rochester

Withdrawn

Page 198 MC/18/3666 257 City Way, Rochester

Recommendation

Amend reason for refusal 2 to read as follows:

- 2 The proposed two storey rear extension, due to its excessive depth, height and location, would result in an obtrusive and dominant form of

development that would have a harmful impact on the occupiers of both 255 and 257a City Way in terms of being overbearing and causing a loss of outlook in relation to habitable rooms. Additionally, for 255 City Way the proposal will result in reduction in daylight, overshadowing and it will also have a detrimental impact on the enjoyment of the rear amenity space. This proposal is therefore contrary to Policy BNE2 of the Medway Local Plan 2003 and paragraph 127f of the National Planning Policy Framework 2019.

Planning Appraisal

Add to the first paragraph of the 'Background section' section of the report, before the last sentence (p.201), '*This extension was proposed to project an additional 4.9m from the main rear wall of the house as now built.*'

Add paragraph to the end of the 'Amenity' section and before the last sentence (p.201):

257a is a chalet bungalow located to the southeast of the proposed dwelling. The property at 257a is built at an angle to the proposed dwelling and there are two habitable room windows at first floor level that face onto the application site. The proposed 7.81m rear projection would result in a dominant form of development in relation to 257a as it would result in loss of outlook and would also create a feeling of enclosure.

Relocate last sentence of the existing paragraph to the end of the section.

Page 204 MC/18/3577 Land Adjacent to Blue Barn Seymour Road, Rainham

Recommendation

Delete conditions 3 to 7 and replace with the following:

- 3 No development shall take place (other than development required to enable the remediation process to be implemented) until the approved remediation scheme contained in Letter from LEAP dated 29 March 2019 ref PL01572/planning has been carried out. The Local Planning Authority must be given not less than two weeks written notification prior to the commencement of the remediation scheme works.

Following completion of the measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced, and submitted to and approved in writing by the Local Planning Authority prior to the bringing into use of the development.

Reason: Required before commencement of development to avoid any irreversible detrimental impact on human health as a result of the

potential mobilising of contamination and in accordance with Policy BNE23 of the Medway Local Plan 2003.

- 4 In the event that unexpected contamination is found at any time when carrying out the approved development that was not previously identified, development must be halted on that part of the site affected by the unexpected contamination to the extent specified in writing by the Local Planning Authority. The unexpected contamination must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 2, which is subject to the approval in writing of the Local Planning Authority.

Following completion of the measures identified in the approved remediation scheme a verification report providing details of the data that will be collected in order to demonstrate that the works set out in condition 3 are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 5.

Reason: To ensure that the development is undertaken in a manner which acknowledges interests of amenity and safety in accordance with Policy BNE23 of the Medway Local Plan 2003.

Renumber conditions 8 to 21 as set out in the report to read as conditions 5 to 18.

Amend former condition 11, now condition 8 to read as follows:

- 8 The development shall be implemented in accordance with the approved Seymour Road Materials Schedule received on 3 April 2019.

Reason: To ensure that the appearance of the development is satisfactory and without prejudice to conditions of visual amenity in the locality, in accordance with Policy BNE1 of the Medway Local Plan 2003.

Correct typing error in former condition 15, now condition 12 as follows:

Delete 'Not within standing' and replace with 'Notwithstanding' in the first sentence.

Planning Appraisal

Add paragraph to the end of the '*Impact on the Countryside, Design and Trees*' section:

The applicant has submitted further information regarding the proposed materials. The roof coverings are proposed to be Purple -Terreal Rustique -

Clay Tiles; Bricks plots 1, 3 and 8 to be Wienerberger - Olde Essex Red Multi; Bricks Plot 2, 4, 5, 6 and 7 to be Bespoke Brick Company – Safier; Vertical tile handing for plots 2, 4, 5, 6 and 7 to be Terreal Priory colour Normandy Sandfaced; Softwood weatherboarding Black to plots 1, 3 and 8; Georgian features bars and wood grain effect windows and doors and black rainwater goods. These materials are considered to be acceptable and therefore the former condition 11, now condition 8, is amended to ensure the materials are in accordance with the submitted document.

Remove from the 'Ecology' section of the report, the word "extremely" from the sentence, '*Breeding birds and reptiles have been recorded within the adjacent site and it is extremely likely that protected species were previously present within the whole site*' (p.219, third sentence).

Add paragraph to the end of the 'Contamination' section

The applicant has submitted further information in the form of Phase II Site Investigation Report undertaken by LEAP ref LP01752 dated 30 January 2019 and Letter from LEAP dated 29 March 2019 ref PL01572/planning.

The phase II report is considered to be acceptable and makes recommendations that gas protection measures are installed in the properties and that a stockpile has elevated levels of lead and benoo(a)pyrene. This stockpile is to be removed from the site as part of the redevelopment works. Waste transfer notes will need to be provided to show that this has happened.

The remediation method statement which was included in the Letter dated 29 March 2019 from LEAP (letter reference: LP01752/planning), is acceptable and should be implemented. A verification report will be required once the remediation has been completed at the site. Consequently the original conditions can amended as recommended above.

**Page 222 MC/19/0286 Garage Site Adj to 1-7 Alfred Close &
Garage Site Adj to 72-75 Maida Road**

Recommendation

Amend condition 11 to refer to Alfred Close rather than Alfred Road.

Page 236 MC/19/0470 371-375 Maidstone Road, Rainham

Recommendation

Amend condition 10 to read as follows:

- 10 No development shall take place until an acoustic assessment has been undertaken to determine the impact of noise from transport related sources in accordance with BS8233 2014: Guidance on Sound Insulation and Noise Reduction for Buildings. The results of the

assessment and details of a scheme of acoustic protection shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include details of acoustic protection sufficient to ensure internal noise levels (LAeq,T) no greater than 30dB in bedrooms and 35dB in living rooms with windows closed and a maximum noise level (LAm_{ax}) of no more than 45dB(A) with windows closed. Where the internal noise levels will be exceeded with windows open, the scheme shall incorporate appropriate acoustically screened mechanical ventilation. The scheme shall include details of acoustic protection sufficient to ensure amenity/garden noise levels of not more than 55dB (LAeq,T). All works, which form part of the approved scheme, shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.

Reason: To safeguard conditions amenity in accordance with Policy BNE2 of the Medway Local Plan 2003.

Relevant Planning History

Delete the description of the proposal from MC/15/2939 and replace with the following description:

Outline application all matters reserved for the construction of first floor extension with dormer windows to form three 1-bedroomed flats including rear land balcony, stairway and parking.

Planning Appraisal

Update for the '*Bird Mitigation*' section:

The contribution has been paid.

Page 258 MC/19/0050 32 Carpenters Close, Rochester

Recommendation

Amend condition 5 to read as follows:

- 5 The dwelling herein approved shall not be occupied until an ecological enhancement plan has been submitted to and approved in writing by the Local Planning Authority, detailing ecological enhancement measures which will be incorporated into the site. The approved measures must be incorporated in to the development, as approved and thereafter retained.

Reason: In the interests of ecology and in accordance with the provisions set out under Policies BNE37, BNE38 and BNE39 Medway Local Plan 2003.

Add new condition 13 as follows:

- 13 Prior to the installation of any external lighting on the site, details of such lighting shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the height, position, external appearance, any shielding and a report to demonstrate its effect on nearby residential properties and bats (including reference to the recommendations of the Bat Conservation Trust), and how this effect has been minimised. Any external lighting shall be implemented in accordance with the approved details.

Reason: In order to limit the impact of the lighting on nearby residents and wildlife and with regard to Policies BNE2 and BNE39 of the Medway Local Plan 2003.

Representations

Delete reference to six letters having been received and the bullet point list of objections and replace with the following:

A total of 12 letters have been received raising the following objections:

- Overdevelopment.
- Overlooking of neighbouring properties and garden.
- Loss of outlook.
- Inadequate parking.
- Additional traffic.
- Vehicles will have difficulty entering and leaving site due to on street parking.
- Difficult for refuse vehicles and emergency vehicles to access.
- Danger to children and elderly.
- Noise and disturbance.
- Impact of local schools.
- There are foxes in the garden.

Planning Appraisal

Update to 'Ecology' section:

An ecological survey of the site has now been carried out and no evidence of bats was found in the buildings and no protected species were found on site. There are no trees on the site with the potential for roosting bats.

Conditions are recommended by the ecologist in respect of ecological enhancements and the impact of any lighting on bats. The ecological survey also identifies that the garden is a suitable habitat for bird breeding and recommends that vegetation is removed outside the bird breeding season. As this is covered by the Wildlife and Countryside Act 1981, an informative will be included on the decision notice should planning permission be granted.



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2019



Land at 4, 16, 20 & 22 High Street, Rainham Councillor Brief (App Ref: MC/18/2864)

Churchill
Retirement Living

Dear Councillor

We write to you regarding our proposals for 54 Retirement Living apartments on land at 4, 16, 20 & 22 High Street, Rainham which are due to be considered at Planning Committee on Wednesday 24 April.

As you will undoubtedly be aware, this application is now the subject of an appeal for non-determination and you are being asked to consider what your recommendation would have been had the Committee been able to determine the application. We very reluctantly submitted our appeal as up until that point we had had discussions with your Officer had been productive and we had been informed that our application would be considered at the March 2019 Committee with a positive recommendation. However, when this Committee date was not forthcoming we had to take the reluctant decision to submit our appeal, especially as five months had passed for the Council to determine the application. Despite this, we have always been keen to secure a local consent if at all possible and so we submitted a duplicate application with a view that this duplicate could be a delegated decision should the Committee recommendation on the appealed scheme be positive.

We are therefore very disappointed that following our appeal submission your Officer in his Committee Report raised issues regarding access & financial contributions - points that had either not been raised previously or on which we were still awaiting a response from your Officer.

We would therefore like to take this opportunity to provide you with details of our scheme and importantly address the concerns raised by your Officer in their report.

We hope that you find this information of interest. Should you require anything further or have any questions ahead of Committee, please do not hesitate to contact us on 0800 294 1304 or email naomi@consullimited.co.uk.

Key Benefits...

- 54 one and two bedroom retirement apartments towards an identified need
- Contributes to the Council's five year housing land supply
- Sustainable, sympathetic, specialist accommodation that sits comfortably in its setting
- Maximises the use of previously developed land and reduces pressure on Greenfield sites
- Economic benefits of older people patronising local shops, services and facilities
- Due to its location, retirement housing reduces the need to travel by car
- Freeing up of family housing by older people looking to downsize an average 41 unit retirement development has been shown to generate 92 moves in the housing chain (Demos)
- A proposal that allows for independent living and reduces security worries for older people
- A scheme that provides companionship and a community which helps to reduce isolation and loneliness

Responding to access concerns ...

Following careful consideration of your Officer's report and the key issues raised regarding an "unacceptable safety hazard to vehicles and pedestrians on the High Street" we have taken the opportunity to address this below and provide clarification of several points raised by your Officer:

Road Safety Audit

We find a request for a Road Safety Audit very unusual given that Local Authorities normally only request one should the works proposed include changing the highway layout significantly i.e. creating a new access or junction. However, if one is deemed necessary it could be covered by the following planning condition:

"No development shall take place until full details of the vehicle and pedestrian access scheme as outlined in Drawing No. 20073RH P02 (to include necessary Road Safety Audits) intended to allow a single lane access to the proposed development for the High Street, have been submitted to and approved in writing by the local planning authority. The approved scheme shall be completed prior to the first occupation of any of the units hereby permitted."

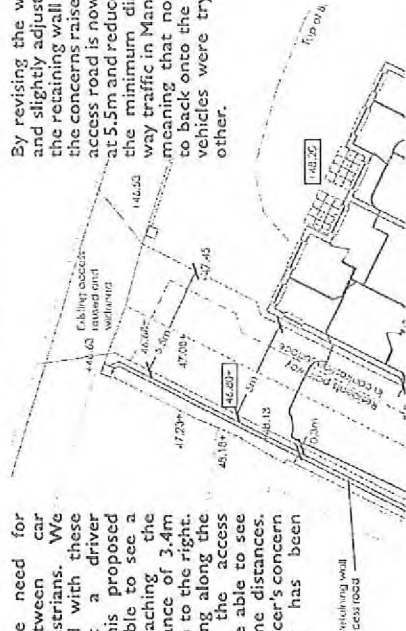
Access Suitability & Pedestrian Visibility

We would like to take this opportunity to clarify that despite your Officer's assertion that we were invited to amend our original proposals to address the areas of concern regarding pedestrian visibility and the road safety audit outlined in his report, this was not the case. We have always worked with your Officer to respond to any queries and ensure that these were addressed. The first time we were made aware of his new concerns was on the publication of his report once we had appealed the application for non-determination - this is most unfortunate given our desire to avoid the submitted appeal.

Despite these areas of concern being raised, we had still hoped to be before you at Committee with an agreed solution. However, your Officer has refused to entertain any discussions on this matter, despite us working tirelessly since the Committee Report was published to address them and this is clearly not in the spirit of the Procedural Guide for Appeals. We have a fully worked up and viable solution that overcomes all of these concerns and this is shown below for your consideration. We hope that with this solution you can now be minded to put on record that you are supportive of the proposals subject to these revisions:

We recognise the need for intervisibility between car drivers and pedestrians. We have demonstrated with these amendments that a driver emerging from this proposed access would be able to see a pedestrian approaching the access over a distance of 3.4m to the left and 6.5m to the right. A pedestrian walking along the footway towards the access point would also be able to see a car over the same distances. Therefore, your Officer's concern over intervisibility has been addressed.

By revising the width of the access and slightly adjusting the location of the retaining wall we have overcome the concerns raised. The width of the access road is now proposed to start at 5.5m and reduce to 5m - exceeding the minimum dimensions for two way traffic in Manual for Streets and meaning that no cars would need to back onto the High Street if two vehicles were trying to pass each other.



A verge of 300mm is also proposed along each side of the access road to provide clearance between the road edge and the retaining walls. This ensures that the full width of the access road is available for vehicles to pass one another.

Our Proposals...

Our scheme (both appealed and duplicate) would provide a mix of 37 x one bedroom and 17 x two bedroom much needed retirement apartments on a previously developed and sustainable site.

Our attractive and sympathetic design would ensure that our proposed scheme would sit comfortably in its setting and be a positive addition to the local community.

23 car parking spaces are proposed which your Officer agrees would be suitable to serve the needs of our development.

Importantly, your Officer has raised no objection to our proposals on grounds of principle of development, affordable housing provision, design, amenity, parking provision, flood risk, noise & air quality and archaeology.

Financial contributions...

As has been highlighted by your Officer in their report, at this time no Unilateral Undertaking or S106 is in place. However, this is not as a result of a desire by us to argue against these contributions, but more seek clarification on how these should be calculated. In a letter to your Officer dated 6 March 2019 we raised questions on those contributions which were calculated based on occupancy rates – namely Green Space Services, Public Realm & NHS. Occupancy rates of older person accommodation is a lot less than traditional family housing and we were requesting for this to be taken into consideration. To date, we have not heard back from your Officer on this.

We should highlight that if these contributions were reduced in line with occupancy rates then the money would not come back to us, but would instead be added to the already agreed affordable housing contribution. So, the overall contribution level would not change, we just need guidance from your Officer as to how it is distributed.

We are hopeful that given the information and solutions provided in this leaflet you are able to support these proposals which we are reluctantly currently appealing for non determination.

If however, you are not able to then we ask that you put on record that our duplicate application, subject to Officer agreement on our revised access arrangements and guidance on financial contributions, be determined under delegated powers. Subject to us receiving the delegated planning permission for this duplicate application we would then withdraw our appeal, saving the Council considerable time and costs.



Above:
PROPOSED SITE LAYOUT

Below: **PROPOSED HIGH STREET ELEVATION (A)**

