

Planning, Design and Access Statement

1st Floor

53-54 Tottenham Court Road

Fitzrovia

W1T 2EJ

21 September 2018

Change of use from residential (C3 use) to office (B1
use)

Applicant: Trustees of Micro Anvika



Sanderson
Weatherall

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1. Introduction

- 1.1. This Planning, Heritage, Design and Access Statement has been prepared, on behalf of the Trustees of Micro Anvika (hereafter 'the applicant'), to support a planning application for a change of use of the 1st Floor, 53-54 Tottenham Court Road, Fitzrovia, W1T 2EJ (hereafter 'the application site') from a vacant residential (C3 Use) to an office (B1 Use) premises.
- 1.2. The purpose of this statement is to describe the site and its location; describe the proposed development; explain the relevant planning history; identify the policy context; explain design and access consideration; and assesses the extent to which it complies with the Development Plan and other material considerations.

The remainder of this report follows the structure set out below:

- Section 2 – Site Location and Description
 - Section 3 – Proposed Development
 - Section 4 – Relevant Planning History;
 - Section 5 – Planning Policy Context;
 - Section 6 – Design and Access Considerations;
 - Section 7 – Planning Justification; and,
 - Section 8 – Conclusion.
- 1.3. Any queries or requests for further information should be addressed to Owen Pike at Sanderson Weatherall LLP (0117 3381813) or email owen.pike@sw.co.uk.

2. Site Location and Description

Application Site Location

- 2.1. The application site is located within the designated Tottenham Court Road Central London Frontage on the south-west side of Tottenham Court Road between the junctions with Goadge Street and Windmill Street, respectively. An A1 shop (currently occupied by ITSU) lies on the ground floor of the building below the application site. There are residential use(s) (flats) on the second and third floors of the building above the application site. It is bounded by a narrow courtyard on the north-west side, beyond which is a retail unit, a café on its south-east side and mixed use offices to the rear (south-west). Opposite the application site is a four-storey building which accommodates a mix of retail and office uses. There are single yellow lines on the south-west side of the street immediately in front of the application site. The property has been vacant for several months.
- 2.2. The nearest residential properties to the application site are located approximately 25m to the south-east on the upper floors of 46 Tottenham Court Road
- 2.3. Tottenham Court Road is a busy street which is home to a wide range of commercial uses including a variety of retail outlets and employment uses as well as residential uses within the heart of Fitzrovia.
- 2.4. The nearest tube station to the application site is 140m to the north-west. The nearest bus stops are on Tottenham Court Road to the south of the application site; there are therefore a number of public transport stops within a short walk of the application site.
- 2.5. The property is located inside the Charlotte Street Conservation Area. It is not located within an area at risk of flooding.

Application Site Description

- 2.6. The application site comprises a 2-bedroom flat on the first floor of a four-storey end of terrace building. The main building entrance is located adjacent to the courtyard on the north-west side of the building.
- 2.7. The total floor area at first floor is approximately 121sq.m (1,306sq. ft.). The internal layout comprises a kitchen, bathroom and two double bedrooms. The property is neither statutorily nor locally listed.

- 2.8. There is no vehicle parking at the property but good access to London's public transport network including the tube and buses. Furthermore, there are several cycle lanes within proximity to the application site allowing for commuting to and from other London Boroughs.

3. Proposed Development

3.1. This application proposes the change of use of the first floor of 53-54 Tottenham Court Road, Fitzrovia, from residential (C3 Use) to Office (B1 Use). No external alterations or extensions are proposed to the property.

4. Relevant Planning History

4.1. A summary of planning applications at 53-54 Tottenham Court Road is provided in the table below.

Table 1: Historic Planning Applications at Application Site

Application Reference	Type of Application and Proposed Development	Decision	Date
PS9804485R4	General refurbishment of the building together with the creation of one additional residential flat (making three flats in total); the construction of a four storey plus basement infill extension facing Kirkman Place for part retail, part residential use; and a two-storey rear extension, over the existing ground floor extension to the property, for residential use.	Resolution to grant subject to Section 106	14/08/1998
N15/20/E/33248	Established Use Certificate for the first, second and third floors of 55 Tottenham Court Road as an office.	Lawful	01/02/82

4.2. The review of the site's planning application has revealed that it has previously been used as an office.

5. Planning Policy Context

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to achievement of sustainable development.
- 5.2. The Statutory Development Plan for an individual site comprises those Local Planning Documents which have been the subject of Examination in Public or testing through Public Inquiry, and are adopted having been through due processes.

5.3.

Development Plan Policy

- 5.4. The Statutory Development Plan most relevant to the proposed development comprises the following:
- Policies Map (June 2018);
 - Camden Borough Local Plan (adopted July 2017); and,
 - Fitzrovia Area Action Plan (adopted March 2014).

Policies Map

- 5.5. The Policies Map reveals that the application site is located wholly within the Tottenham Court Road Central London Frontage, the Protected Primary Frontage, the Fitzrovia Area Action Plan, the Safeguarding Area for High Speed 2 and the Charlotte Street Conservation Area.

Camden Borough Local Plan

- 5.6. The Camden Borough Local Plan (CBLP) was adopted by the LPA in July 2017. It provides the spatial strategy for the Borough identifying the type, scale and broad locations of where new homes, transport improvements, jobs, shops, open spaces and services should occur in the period to 2031. It also provides policies to ensure new development addresses the key issues facing the area. The most relevant policies to the proposed development are identified below.
- 5.7. **Policy G1** identifies how the Council will deliver new jobs, amongst other things, to meet its identified needs as well as outlining the approach that will be taken to applications that support

growth and investment within the Borough. It suggests that the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by, inter alia:

- a. *“supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;*
- c. *expecting the provision of a mix of uses where appropriate, in particular the most accessible parts of the borough, including an element of self-contained housing where possible;”*

5.8. The policy also identifies that there is an objectively assessed need to provide 695,000sqm of office floorspace to 2031.

5.9. Furthermore, criterion e) identifies ‘Tottenham Court Road’ as 1 of only 5 growth areas in the Borough where development should be concentrated. Together with other highly accessible locations and the areas located within the Council’s Community Investment Programme (inferred), Policy G1 expects growth areas to accommodate the most significant growth.

5.10. **Policy E1** provides the strategic policy for delivering economic development across the Borough. It states as follows:

“The Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

We will:

- a. *“support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;*
- b. *maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- c. *support local enterprise development, employment and training schemes for Camden residents;*
- d. *encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*

- e. *support the development of Camden’s health and education sectors and promote the development of the Knowledge Quarter around Euston and King’s Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;*
- f. *direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031...”*

5.11. Supporting text highlights the need for premises suitable for small businesses and the pressure on SMEs to find appropriate sites. **Para 5.6** states: *“In order to secure a strong and successful economy, the Council will support businesses of all sizes, particularly start-ups, small and medium-sized enterprises. Camden has a large proportion of small businesses, with 53% employing less than nine people and a further 14% employing between 10 and 49 employees. However, premises suitable for small businesses as well as medium sized enterprises are currently under pressure from rising land values, limited land availability and ‘permitted development’ rights which allow the change of use from offices (B1(a)) to housing (C3) without the need for planning permission and therefore without assessment against our planning policies”.*

5.12. **Policy H3** seeks to protect ‘all’ housing floorspace where people live long-term. Supporting text (**Para 3.66**) clarifies that the policy *“also seeks to protect individual self-contained houses and flats (in Use Class C3)”* and Houses in Multiple Occupation (HMOs). Policy H3 states as follows:

“The Council will aim to ensure that existing housing continues to meet the needs of existing and future households by:

- a. *resisting development that would involve a net loss of residential floorspace, including any residential floorspace provided;*
 - *within hostels or other housing with shared facilities; or*
 - *as an ancillary element of another use, wherever the development involves changing the main use or separating the housing floorspace from the main use...”*

5.13. **Policy TC1** relates to the quantity and location of retail development. It is clear that the Council will focus new shopping and related uses in Camden’s designated growth areas and existing centres, having regard to the level of capacity available in these locations. It outlines how retail and other town centre uses will be distributed across the Borough including the designated ‘Growth Areas’, ‘Town Centres’, ‘Central London Frontages’, and ‘Neighbourhood centres, specialist shopping areas, and small shops outside of centres’. It states as follows:

- *“...additional provision as part of redevelopment schemes in growth areas of Tottenham Court Road, Houlton and West Hampstead Interchange...”*
 - *significant provision in the Tottenham Court Road Central London Frontage...”*
- 5.14. **Policy TC2** relates to Camden’s centres and other shopping areas. It is relevant insofar as it outlines the roles of designated primary frontages, amongst other things. It states as follows:
- f. “...protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre...”*
- 5.15. **Policy TC4** relates to town centre uses. It seeks to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. It identifies a number of issues the Council will consider when determining planning applications. The most relevant are stated below.
- a. “the effect of development on shopping provision and the character of the centre in which it is located; ...*
 - c. the Council’s expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;*
 - d. the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail; ...*
 - g. the impact of the development on nearby residential uses and amenity and any prejudice to future residential development;*
 - h. parking, stopping and servicing and the effect of the development on ease of movement on the footpath...”*
- 5.16. Supporting text (**Para 9.32**) confirms that town centre uses includes offices (B1a use class), amongst other things.
- 5.17. **Appendix 4** identifies that there should be a minimum of 80% of the Tottenham Court Road Central London Frontage in A1 (shop) use.
- 5.18. **Policy T2** relates to parking and car-free development. It is relevant because it is clear that the Council will limit the availability of parking and require all new developments in the Borough to be car-free.

5.19. **Policy A1** relates to managing the impact of development. It states as follows:

“The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless it causes unacceptable harm to amenity.

We will:

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;*
- b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;*
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and*
- d. require mitigation measures where necessary.*

The factors we will consider include:

- e. visual privacy, outlook;*
- f. sunlight, daylight and overshadowing;*
- g. artificial lighting levels;*
- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;*
- i. impacts of the construction phase, including the use of Construction Management Plans;*
- j. noise and vibration levels;*
- k. odour, fumes and dust;*
- l. microclimate;*
- m. contaminated land; and*
- n. impact upon water and wastewater infrastructure.”*

Policy D2 seeks to protect Conservation Areas and Listed Building within the borough through not permitting a development that will result in a “...loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary...”. **Policy D2** also pursues to prevent the removal or alteration of existing buildings within the conservation area, even if they are not listed, as this may cause harm to the conservation area.

Fitzrovia Area Action Plan

5.20. The Fitzrovia Area Action Plan (AAP) was adopted by the Council in March 2014. The purpose of the AAP is to help to shape the future of Fitzrovia and the western part of Bloomsbury by developing a vision for the area, ensuring that growth takes place in a balanced way, coordinating development proposals across a number of significant sites and ensuring that growth delivers the maximum benefits to the area. The policy of most relevance to the proposed development is **Principle 4** which states as follows:

“The Council will support small and medium enterprises (SMEs) by seeking to ensure that where appropriate:

- *existing business premises suitable for SME use are retained;*
- *new business development is designed flexibly to allow parts of the property to be occupied by SMEs.”*

5.21. Supporting text to the policy (Para 1, p4) states that *“The Council will particularly seek to maintain a supply of premises that can provide lettings of less than 100 sq m.”*

Material Consideration

5.22. Material considerations include the National Planning Policy Framework and relevant supplementary planning documents.

National Planning Policy Framework (The Framework)

5.23. The Framework, published in July 2018, states that the purpose of the planning system is to contribute to the achievement of sustainable development by performing an economic role, social role and environmental role. Critically, the Framework requires these roles to be delivered in mutually supportive ways to secure net gains across each of the different objectives.

5.24. The Framework places a presumption in favour of sustainable development at the centre of the planning system. It clarifies that the presumption in favour means proposals that accord with the

development plan should be approved without delay, or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, proposals should be permitted, unless *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...”* (Paragraph 11).

- 5.25. **Paragraph 38** states that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”*
- 5.26. **Paragraph 80** explains that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. The same paragraph goes on to states that *“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...”* (underlined text – our emphasis)
- 5.27. Under the theme *Building a strong, competitive economy*, **Paragraph 81** identifies four matters that should be addressed in planning policies. The matters most relevant to the proposed development are as follows:
- “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;”*
- “d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*
- 5.28. **Paragraph 104** suggests that planning policies should support an appropriate mix of uses to minimise the number and length of journeys. **Paragraph 118** suggests that planning policies and decisions should encourage mixed use schemes to encourage multiple benefits from urban land.
- 5.29. **Camden Planning Guidance – Employment sites and business premises (Supplementary Planning Document)**
- 5.30. This document supports Camden Local Plan policies E1 Economic development and E2 Employment premises and sites. The document also provides guidance on the circumstances when the Council will consider alternative uses for an employment site. Furthermore, it provides

information on marketing requirements, some of the designated centres, the affordability of workspaces and planning obligations.

- 5.31. Of particular relevance to the proposed development is **Para 13** which relates to offices. It states *“Camden’s Local Plan sets out the projected demand and planned supply of office floorspace (use class B1a) in the borough. The Council will expect the supply of offices to meet the projected demand over the plan period but acknowledge that a substantial proportion of the projected supply is likely to consist of larger floorplate, corporate office space in the Kings Cross and Euston areas which are generally out of reach of micro, small and medium-sized enterprises (SMEs). We will support the retention and/or re-provision of employment space in other parts of the borough, particularly where this consists of space that is suitable and affordable for micro and small businesses and particularly where this space is suitable for our growth and other importance sectors and business clusters.”* (underlined text – our emphasis)

6. Design and Access Considerations

Use

- 6.1. The proposed development is a change of use of the 1st Floor, 53-54 Tottenham Court Road, Fitzrovia, from a vacant residential (C3 Use) to an office (B1 Use) premises.
- 6.2. No external alterations are proposed to the building.

Amount

- 6.3. The extent of the proposed development is limited to using the existing footprint of the property, namely: 121 m² (1300 ft²).

Layout

- 6.4. The internal layout of the property will be unaltered. The new office use will also continue to use the existing side entrance of the building that currently provides access to the upper floors of the building.

Scale

- 6.5. The scale of the building will be unaltered because no extensions or outward additions are proposed.

Landscaping

- 6.6. No landscaping is proposed because the proposed development relates only to how the property is used.

Appearance

- 6.7. The existing facades of the building and its roof will be unaltered such that there will be no changes to the appearance of the property.

Access

- 6.8. The existing side entrance to the property located off the courtyard will continue to serve as the pedestrian access into the premises and will not be altered or widened.

6.9. With regards to the property's accessibility to the highway network, public transport and cycle linkages, the site benefits from short walking distance to both Goodge Street and Tottenham Court Road tube stations alongside numerous bus routes and cycle lanes in proximity.

7. Planning Justification

- 7.1. This section of the statement sets out the justification for the proposed change of use when considered against the relevant planning policies and other material considerations.
- 7.2. The key issues arising from this proposal are as follows:
- a) Principle of development;
 - b) Impact on the character, function, vitality and viability of the Central London Frontage;
 - c) Amenity; and,
 - d) Heritage Impact Assessment.
- 7.3. Each of these issues is now discussed in turn.

Principle of Development

- 7.4. The application site is currently vacant and was last used as a residential flat several months ago. It therefore makes no social contribution nor provides any economic value to Tottenham Court Road which is both a designated Growth Area and Central London Frontage. The proposed development would change this by bringing an unused property, which was previously used as an office, back into use for office purposes. The principle of the development is supported by the adopted Development Plan, specifically Policy G1, which seeks to direct the most significant growth and concentrate development within Growth Areas and promote the most efficient use of buildings. Similarly, Policy E1 which provides the strategic policy for delivering economic development across the Borough seeks to direct new office development to the Growth Areas, amongst other things. Additionally, Policy TC1 supports significant provision of town centre uses (which includes B1 office use) at Central London Frontages, such as the application site.
- 7.5. It is contended that the size of the application site is likely to be attractive to small and medium enterprises (SMEs). These types of businesses are supported by Principle 4 of the Fitzrovia Area Action Plan (AAP). Further in-principle support for the proposed development is provided by the *Employment sites and business premises* SPD which is supportive, amongst other things, of the 're-provision' of employment floorspace especially if it is suitable for SMEs and micro businesses because the Borough is mainly made up of small or start-up businesses that require small office spaces. The proposed development merely seeks to revert a use into the application site which historically occurred at the property.

7.6. In addition to being potentially attractive to SMEs and providing floorspace for office jobs, other benefits of the proposed development are that it will make a small, but nevertheless important, contribution to the 695,000sqm office floorspace target within the Borough, which is set by Policy G1.

7.7. Given there is an Article 4 Direction which removes permitted development rights that allow B1 offices to be changed to C3 residential dwellings, subject to prior approval, the Council recognises that such offices make a significant contribution to economic growth, there is a shortage of office space available within the Borough and it is therefore difficult for start-up, micro businesses and SMEs to locate themselves in the Borough. Accordingly, the Article 4 Direction protects existing B1 office floorspace. It therefore follows that the Council must look favourably at proposals that seek to create new B1 office floorspace, particularly cases which involve properties that have historically been used for office purposes, and that are small-scale, both of which apply to the proposed development which is the subject of this current planning application.

National planning policy, as reflected in the Framework, is extremely supportive of proposals that facilitate economic growth and productivity and initiatives that help to contribute to a strong and competitive economy so much so it places significant weight on proposals that support economic growth and productivity.

7.8. The proposed development will result in the loss of residential floorspace however, it is contended that this does not mean the principle of the development is unacceptable. It has been demonstrated above how the principle of the development is in accordance with the Development Plan and material considerations. In any case, it is suggested that the application site is more suitable for office use (than a residential flat) because of its location immediately above an A1 shop and due to the absence of external amenity space. It is also suggested that the benefits of providing jobs and potentially accommodating an SME, start-up or micro business in a location where such businesses are encouraged will be greater than providing a two-bedroom apartment.

7.9. Overall it is considered that the principle of the proposed development in this location is entirely acceptable.

Impact on the Character, Function, Vitality and Viability of the Central London Frontage

7.10. Policy TC4 identifies criteria that planning applications for town centre uses will be judged against. An assessment against the most relevant criteria is therefore provided below.

7.11. There will be no harm caused to the shopping provision within the Tottenham Court Road Central London Frontage (CLF) because retail uses only occur at present on the ground floor of the building.

The application site is not used ancillary to the ground floor premises, such as for retail storage or welfare space for staff. The first floor is an entirely separate planning unit. The proposed development will not generate any changes to the retail frontage nor will the first floor be accessed from the principal façade facing Tottenham Court Road. Accordingly, there will be no harm to the character of the CLF.

- 7.12. By being limited to the first floor only, there will be no change to the balance and mix of uses within the frontage.
- 7.13. Although there will be a small reduction in the amount of residential floorspace in the building, the provision of additional residential accommodation is not an individual planning objective for Tottenham Court Road within the *Camden Planning Guidance on town centres and retail SPD*.
- 7.14. There will be no significant harm caused to the amenity of the residential properties on the upper floors because it is likely that any occupier of the application site would operate between the hours of 9:00am and 5:00pm on weekdays only. Such hours are compatible with adjoining residential properties. In truth, it is considered that introducing an office use between the retail shop on the ground floor and the residential properties above would result in a betterment because any disruption and noise caused by service deliveries to the retail shop and other associated activities, which might cause disturbance would be located further away from the residential properties. An office unit on the first floor would act as a noise buffer.
- 7.15. It should also be noted that there will be no material harm to users of the footpath in front of the building because B1 offices generally only generate a limited number of service deliveries for supplies and stock as well as minimal waste.
- 7.16. Other relevant considerations are that the proposed change of use will accommodate several office workers once it is occupied. By making use of the vacant property, the proposed change of use will add footfall in the daytime to this part of Tottenham Court Road which is likely to result in additional activity and trade within eating establishments, coffee shops and other retail outlets, particularly at lunch times. This will therefore contribute to enhancing the vitality and viability of this part of the Tottenham Court Road Central London Frontage.
- 7.17. It is for the above reasons why the proposed development is considered to be in accordance with Policy TC4.
- 7.18. As there will be no loss of retail floorspace in a Protected Primary Frontage the retail function of the Tottenham Court Road CLF will be maintained which is entirely in accordance with Policy TC2.

Amenity

- 7.19. No extension, outward addition or any other exterior alterations are proposed to the property because the application relates solely to the use of the first floor of the building. It will therefore have no overbearing visual impacts on nearby residential properties nor overshadowing on any amenity space or on the public realm below. Furthermore, the absence of new external windows will also result in no harm from overlooking. In fact, it is of significance that the remaining residential floorspace (apartments) in the building within which the application site is located is actually located above on the second and third floors.
- 7.20. It is also considered that the proposed office use will represent a planning benefit to the area due to there being no disturbance to neighbouring properties in the evenings or cause prejudice to other users within the building.
- 7.21. On this basis, the proposed development proposal is considered to be in accordance with Policy A1.

Heritage Impact Assessment

- 7.22. Whilst the property is located within the designated Charlotte Street Conservation Area, the absence of material changes and alterations to the exterior of the building will have no impacts on the character and appearance of the Conservation Area. For the avoidance of doubt, the appearance of the building will be unaltered such that it will continue to be in keeping with the vernacular of the area.
- 7.23. The proposed development will therefore be in accordance with Policy D2.

8. Conclusion

- 8.1. The proposed development comprises the change of use of the 1st Floor of 53-54 Tottenham Court Road from a vacant residential (C3 Use Class) to an office (B1 Use Class) premises.
- 8.2. The information provided within this application demonstrates that the proposed development complies fully with the Development Plan policies. It also demonstrates that there are no material considerations that indicate planning permission should be refused.

8.3. It is therefore respectfully suggested that full planning permission should be granted for the proposed development.



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