

Thurrock Borough Council,  
Civic Offices,  
New Rd,  
Grays  
RM17 6SL

7<sup>th</sup> November 2023

Dear Thurrock Borough Council,

**[Whitehall Works Whitehall Lane Grays Essex RM17 6SS](#)**

Please see attached a planning application for the redevelopment of the above site. The application proposes the demolition of the existing dilapidated buildings on site which will facilitate the development of 6 family homes and associated works.

The application is supported by the following documents:

- Design and Access Statement prepared by Sawkins Architects;
- Noise Assessment prepared by Sharps Redmore;
- Transport Assessment prepared by I Transport, and
- Planning Statement (attached) prepared by Nova Planning.

Should you require any further information, please contact me. We look forward to discussing the application with you in due course.

Kind Regards,

**[Donncha Murphy](#)**  
**Nova Planning**



# PLANNING STATEMENT

## Introduction

Nova Planning Limited has been instructed by Mr Glenn Mullett to prepare and submit an application for the redevelopment of Whitehall Works, Whitehall Lane, Grays Essex.

The site is positioned within the town of Grays, sitting in close adjacency to Whitehall Lane, set back behind the already existing terraced houses along the road. The site currently consists of a builders yard, surrounded by industrial and residential units.

The application site is a largely rectangular plot currently used as light industrial (E), accessed via No's 58 and 60 Whitehall Lane leading towards Whitehall Works, on the eastern side of Whitehall Lane.

To the immediate east of the site there are single storey industrial buildings, serving as a scrap depot and a MOT centre. To its south there is another two-storey car repair garage.

To its immediate west, separated by a fence and an alley, and continuing across the whole west boundary, are positioned terraced houses, with back gardens facing towards the site.

To the north, the site boundary is defined by an existing block of flats and its allocated car park spaces.

The site access point is through an existing road between the block of flats and the terraced houses on the north-west.

There is a significant variety of building typology within the area, therefore no defined building pattern can be established. While there is some variety in the architectural style of the area, traditional forms are predominant. Gabled ends and dormer windows are prevalent characteristics. A mixture of brickwork and render defines the elevations. There is predominance of clay roof tiles in the area, however slate can be also highlighted in across Whitehall Lane.

## Proposal

The application seeks permission for the erection of 6 No. terraced 3-bedroom family houses with associated access, external amenity spaces, shared cycle parking storage, intermediate refuse storage and a total of No. 15 car parking spaces, following demolition of existing structures and removal of hardstanding, at Whitehall Works, Whitehall Lane, Grays RM17 6SS.

The proposal is a revised application following the refusal of application Ref. No: 20/00108/FUL. Please see attached **Appendix 1** for the Officers Report and **Appendix 2** for the Decision.

## Relevant Planning History

20/00108/FUL | Erection of 7.no dwellinghouses with associated amenity space and parking following demolition of existing structures and removal of hardstanding. | Whitehall Works Whitehall Lane Grays Essex RM17 6SS. This application was refused for the following reasons:

1. The proposed development would, by reason of its mass, bulk, scale, layout, substandard private amenity area provision and lack of cycle storage provision, be likely to result in the overdevelopment of the site leading to a cramped form of development in relation to the surrounding area. The proposal is therefore contrary to policies PMD2, CSTP22, and CSTP23 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015 and the National Planning Policy Framework 2019.
2. The proposed development would, by reason of its close proximity to existing commercial uses and businesses, be likely to result in a poor residential environment and it is likely that residents would complain about the adjoining commercial uses, which would impact upon the commercial operations of their businesses. As such, it is considered that proposal fails to justify that the proposed use would be compatible with the adjacent commercial uses, contrary to policies CSSP2 and CSTP6 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015.
3. The proposed development would, by reason of its close proximity to existing commercial uses and businesses and small garden sizes, be likely to result in unacceptable noise disturbance for occupiers when using their gardens, particularly during summer months and inadequate private amenity space. This would result in an unacceptable living environment for future occupiers, harmful to their amenity. The proposal is contrary to policies PMD1 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015.
4. The proposed development would, by virtue of the intensification of the use of a narrow accessway and, its substandard emerging visibility, result in an unacceptable and harmful impacts upon pedestrian and highway safety including inadequate refuse collection and servicing. Furthermore, the lack of covered cycle storage and electric charging points fail to meet the Council's draft parking standards. For these reasons the development is contrary to policies PMD2 and PMD8 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015

This application will be discussed in further detail throughout the report.

## **Planning Policy**

### **National Planning Policy Framework (NPPF)**

The revised NPPF was published on 20th July 2021. The NPPF sets out the Government's planning policies. Paragraph 2 of the NPPF confirms the tests in s.38(6) of the Planning and Compulsory Purchase Act 2004 and s.70 of the Town and Country Planning Act 1990 and that the Framework is a material consideration in planning decisions.

The following chapter headings and content of the NPPF are particularly relevant to the consideration of the current proposals:

#### 4 - Decision-making

- 5 - Delivering a sufficient supply of homes
- 6 - Building a strong, competitive economy
- 9 - Promoting sustainable transport
- 11- Making effective use of land
- 12 - Achieving well-designed places
- 14 - Meeting the challenge of climate change, flooding and coastal change
- 15 - Conserving and enhancing the natural environment

### National Planning Practice Guidance (PPG)

In March 2014 the Department for Communities and Local Government (DCLG) launched its planning practice guidance web-based resource. This was accompanied by a Written Ministerial Statement which includes a list of the previous planning policy guidance documents cancelled when the NPPF was launched. PPG contains subject areas, with each area containing several subtopics. Those of particular relevance to the determination of this planning application comprise:

- Air Quality
- Design: process and tools
- Determining a planning application
- Hazardous Substances
- Housing and economic land availability assessment
- Housing and economic needs assessment
- Housing needs of different groups
- Housing: optional technical standards
- Land affected by contamination
- Land Stability
- Noise
- Travel plans, transport assessments and statements in decision-taking
- Use of Planning Conditions.

### Local Planning Policy: Thurrock Local Development Framework (as amended) 2015

The Council adopted the “Core Strategy and Policies for the Management of Development Plan Document” in (as amended) in January 2015. The following Core Strategy policies apply to the proposals:

#### Spatial Policies

- CSSP1 (Sustainable Housing and Locations)
- CSSP2 (Sustainable Employment Growth)

#### Thematic Policies

- CSTP1 (Strategic Housing Provision)
- CSTP6 (Strategic Employment Provision)
- CSTP22 (Thurrock Design)

#### Policies for Management of Development

- PMD1 (Minimising Pollution and Impacts on Amenity)
- PMD2 (Design and Layout)

- PMD8 (Parking Standards)
- PMD9 (Road Network Hierarchy)

### [Thurrock Local Plan](#)

In February 2014 the Council embarked on the preparation of a new Local Plan for the Borough. Between February and April 2016 the Council consulted formally on an Issues and Options (Stage 1) document and simultaneously undertook a 'Call for Sites' exercise. In December 2018 the Council began consultation on an Issues and Options [Stage 2 Spatial Options and Sites] document, this consultation has now closed and the responses have been considered and reported to Council.

On 23 October 2019 the Council agreed the publication of the Issues and Options 2 Report of Consultation on the Council's website and agreed the approach to preparing a new Local Plan.

### [Thurrock Design Strategy](#)

In March 2017 the Council launched the Thurrock Design Strategy. The Design Strategy sets out the main design principles to be used by applicants for all new development in Thurrock. The Design Strategy is a supplementary planning document (SPD) which supports policies in the adopted Core Strategy.

### [Planning Issues](#)

The assessment below covers the following areas:

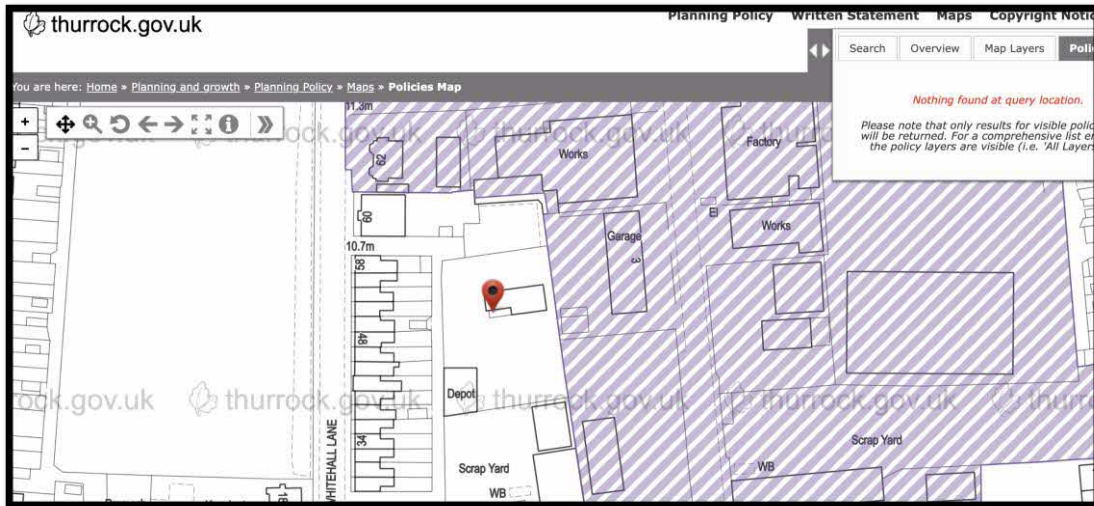
- Principle of the Development;
- Design and Layout
- Neighbour Impact
- Provision of a Suitable Living Environment
- Traffic Impact, Access and Car Parking
- Impact Upon Ecology and Biodiversity
- Ground Contamination
- Viability and Planning Obligations
- Other Matters

### [Principle of Development](#)

The proposal seeks to change the use of this light industrial (B1) use commercial site to residential (C3) use and to erect 6 family dwellings on site.

The site is bounded by residential to the west and industrial/commercial to the north, east and south.

The site lies adjacent to commercial premises which are designated secondary commercial and industrial sites under CS Policies CSSP2 and CSTP6. As such, new development adjacent must be compatible with the existing commercial uses. However, the site itself is not designated for commercial use.



Site as shown on the policies maps with commercial zoned areas to the north and the east

Under the most recent application on site 20/00108/FUL, the Council concluded that:

‘Whilst there are no in principle policy restrictions on the use of this site for residential, it must be shown conclusively that residential development can be implemented in a way which gives optimum amenity to the occupiers without prejudicing the commercial activities’.

Therefore, the principle for residential development on site has already been considered acceptable. There has been no policy change since this application was determined.

### **Design and Layout**

To the immediate east of the site there are single storey industrial buildings, serving as a scrap depot and a MOT centre. To its south there is another two-storey car repair garage.

To its immediate west, separated by a fence and an alley, and continuing across the whole west boundary, are positioned terraced houses, with back gardens facing towards the site.

To the north, the site boundary is defined by an existing block of flats and its allocated car park spaces.

All industrial buildings in adjacency have been considered to be significant sources of noise, and significant emphasis was put into adequately responding to this issue. The design and layout were heavily influenced by the input from our noise consultant and transport consultants.

The site allows for strategic building orientation, resulting in noise mitigation and better comfort and energy performance. The low- built south and west boundaries allow for the new developments and their allocated amenity areas to benefit from the sunlight, allowing for strategies, such as solar harvesting to be implemented.

Furthermore, floor plans developed in a specific way provide heat and solar gain in spaces that require such, ensuring spaces occupied during the day benefit of the sunlight, while spaces, producing their own heat (i.e. kitchen) are positioned to the north-east.

To the east a significant separation should be sought from the site boundary, to ensure noise mitigation, privacy and comfort have been achieved for both new, but also existing residents.

The site currently consists of a number of low-rise industrial buildings in poorly maintained condition, similar in essence to the industrial nature of the buildings east of the site boundary.

The whole area, positioned to the east is occupied by industrial buildings, resulting in the creation of noise withing working hours. A scrap depot is adjacent to the site to the immediate east of the site boundary. A MOT garage is also sharing a boundary with the site to the east.

All plots to the east are characterised by low-rise buildings, thus providing no risk of overbearing and overshadowing the newly proposed developments. Furthermore, the level, east from the boundary, is significantly lower, further lowering the risk of overshadowing.

The area, positioned to the west of the site, is characterised by two storey terraced houses with allocated rear amenity provisions. The site is neighbouring the existing dwellings' rear amenity spaces, thus omitting the chance of overbearing or overlooking over existing dwellings.

As mentioned above, there is a recently refused planning application (Ref. No.: 20/00108/FUL) for the development of the Whitehall Works site. The previous application consisted of 7 No. dwellinghouses with associated amenity space and parking following demolition of existing structures and removal of hardstanding. The second reason for refusal related to the design and layout of the scheme. It stated:

*'The proposed development would, by reason of its mass, bulk, scale, layout, substandard private amenity area provision and lack of cycle storage provision, be likely to result in the overdevelopment of the site leading to a cramped form of development in relation to the surrounding area'.*

The layout of the previous scheme is shown below:



The key element of the previous scheme is the east facing garden and outdoor amenity space. The parking spaces were located to the west of the site adjacent to residential properties.

This proposal has sought to overcome the previous concerns raised. We have established the following principles, which guided us through the design of our current scheme:

- Reducing the mass, bulk and scale of the scheme, by proposing a total of 6 No. Dwellinghouses;
- Refining the site layout, resulting in more high standard amenity area provision allocated to each dwellinghouse;
- Introducing secondary private access to individual amenity spaces;
- Refining the site layout so flank elevations are positioned towards the businesses to the south, and such that a road is separating front the elevation from the east, ensuring noise disturbance is minimised;
- Introducing acoustic fencing on boundaries with businesses to minimise noise disturbance;
- Introducing design solutions to further improve the acoustics qualities of the dwellings;
- Provide EV charging points as per the council's requirements;
- Refine site access route to provide adequate servicing and refuse collection.

The layout has been carefully considered to reflect both our established principles, but also the constraints present on site. A new road connecting all dwellinghouses, with a total of 15 car parking spaces positioned around it, has been introduced to the east to achieve a bigger separation distance between the new buildings and the established noise constraints to the east.





### Proposed site layout

The amenity space is now west facing and the previous concerns with the relationship with the commercial uses to the east have been eliminated. A noise report submitted in support of the development outlines that the revised amenity space is of high quality and meets all technical standards.

The existing landscape is poorly maintained and predominantly consists of hardstanding. The site redevelopment allows for soft landscaping and vegetation to be introduced, creating a pleasant living environment benefiting the local character of the area.

The level of development has been reduced from 7 dwellings to 6 which allows greater spacing to be provided throughout the site and addresses the bulk and massing issues which were raised previously.

The scale of the units is two storeys with rooms in the roof space which corresponds with the scale of the adjoining properties as evidenced by the photo below which illustrates the street scene to the west of the site.



Street scene at the entrance to the site

The proposal represents a significant change from the previous layout in that the amenity space of the units now adjoins the residential uses to the west of the site. This creates a suitable amenity space for future occupiers and deals with the main issue of concern raised previously.

The reduction in the number of units, the separation distance maintained to the adjoining properties and the increased levels of parking and landscaping has served to address the concerns regarding a cramped form of development.

A communal bicycle storage for a total of 12 bicycles (2No. per dwelling) and an intermediate refuse storage have also been introduced.

It is considered has addressed the previous design concerns raised by the Planning Team.

### Neighbour Impact

The proposed development is in a area with a mix of uses. To the west of the site there are residential properties with gardens which back onto the commercial yard. The removal of the noise generating light industrial use and replacement with a residential use will serve to improve the relationship these properties enjoy with the subject site. This is a significant planning gain.

The main concerns raised in relation to the previous application 20/00108/FUL related to the potential impact on the commercial neighbours. Reason for refusal No. 2 stated:

*‘The proposed development would, by reason of its close proximity to existing commercial uses and businesses, be likely to result in a poor residential environment and it is likely that residents would complain about the adjoining commercial uses, which would impact upon the commercial operations of their businesses. As such, it is considered that proposal fails to justify that the proposed use would be compatible with the adjacent commercial uses, contrary to policies CSSP2 and CSTP6 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015’.*

Thurrock Council previously refused permission for the erection of seven dwellings (reference no.: 20/00108/FUL). The delegation report highlighted that whilst the council’s environmental health officer (EHO) raised no objections to the proposal and agreed that the glazing specified in the noise report accompanying the application would achieve the requirements of BS 8233, a condition requiring a scheme of noise mitigation would be appropriate. The application was still deemed unacceptable.

This scheme represents a significant improvement from the previous scheme, in relation to the relationship with the adjoining commercial neighbours simply because the previous scheme had its amenity space backing onto the commercial uses to the east of the site. Officers understandably raised an issue with this relationship.

The amenity space of the units will now back onto the residential use to the west of the site. The built form of the two-storey dwelling will act as a further noise buffer. And finally, a larger parking area to the east of the site will be enclosed by an acoustic fence to reduce all potential impacts.

The significant changes made will ensure that the noise from the commercial uses to the east of the site will be minimal, as outlined in the supporting noise report. The proposed development will not impact upon the commercial operations of the nearby businesses.

### **Provision of a Suitable Living Environment**

The third reason under the previous application related to the creation of a suitable living environment for future occupiers. It stated that:

*‘The proposed development would, by reason of its close proximity to existing commercial uses and businesses and small garden sizes, be likely to result in unacceptable noise disturbance for occupiers when using their gardens, particularly during summer months and inadequate private amenity space. This would result in an unacceptable living environment for future occupiers, harmful to their amenity. The proposal is contrary to policies PMD1 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015’.*

The issue of the proximity to the commercial uses has been addressed by reversing the layout from what was previously proposed such that the gardens are now facing east, as outlined above.

The change of the layout of the scheme, the reduction in the number of units and the submission of a detailed noise assessment in support of the application, have served to address the previous concerns raised by officers.

We welcome the opportunity to discuss the proposal further with the Councils EH Team.

### **Traffic Impact, Access and Car Parking**

The site has a single vehicular access point and currently has no allocated parking spaces. It is in close proximity to Grays Rail and Bus Station, within a walking distance of Grays Town centre, as well as number of public amenity spaces, including shopping centres and supermarkets. The area's relatively flat terrain allows for cycling as an alternative mean of transportation. The site is therefore located in a very sustainable location.

The final reason for refusal under the previous scheme related to the access and highways issues. It stated:

*'The proposed development would, by virtue of the intensification of the use of a narrow accessway and, its substandard emerging visibility, result in an unacceptable and harmful impacts upon pedestrian and highway safety including inadequate refuse collection and servicing. Furthermore, the lack of covered cycle storage and electric charging points fail to meet the Council's draft parking standards. For these reasons the development is contrary to policies PMD2 and PMD8 of the adopted Thurrock Core Strategy and Policies for Development DPD (as amended) 2015'.*

This reason for refusal appeared in part to be a 'holding' objection until further information was provided, with the highway authority providing suggested conditions if the planning authority were minded to approve the application. The additional information sought has been provided as part of the revised application.

As shown on drawing ITB19089-GA-002, the existing access road initially has a width of circa 4.6m with a margin either side of the carriageway (circa 0.4m – 0.5m). This then increases to circa 5.4m within the site. Within the adopted highway, visibility splays of 2.4m x 25m can be achieved to the north and south. This is consistent with the guidance in Manual for Streets for 20mph vehicle speeds which should be expected given the residential nature of Whitehall Lane and that there is traffic calming at regular intervals.

Speed surveys undertaken in 2017 (included in Appendix B) demonstrate 85th percentile speeds are slightly below 20mph. These have been shown to a small offset (0.5m) from the kerb which is encouraged by Manual for Streets 2 which sets out that "For simplicity it has previously been measured along the nearside kerb line of the main arm, although vehicles will normally be travelling at a distance from the kerb line. Therefore, a more accurate assessment of visibility splay is made by measuring to the nearside edge of the vehicle track" (Manual for Streets 2, paragraph 10.5.3). Adequate visibility can therefore be achieved.

Whilst it is not proposed to formally set out priority for vehicles within the site, drawing ITB19089-GA-002 demonstrates that a vehicle exiting from the site has adequate visibility to vehicles travelling along Whitehall Works to enter and exit from the existing parking area. Visibility splays of 2.4m x 11m have been shown which are appropriate for 10mph vehicle speeds.

Vehicle speeds in this area will be low due to the geometry of Whitehall Works and the presence of gates on the exit from the existing parking area.

The access will be in the form of a shared surface (with pedestrians, cyclists and vehicles sharing the same space). As set out in Manual for Streets in paragraph 7.2.14, “shared surface streets are likely to work well:

in short lengths, or where they form cul-de-sacs;  
where the volume of motor traffic is below 100 vehicles per hour (vph) (peak); and  
where parking is controlled, or it takes place in designated areas.”

This is the case in this instance with the street being a short cul-de-sac serving only a small number of properties. Traffic speeds and vehicle volumes will be low (circa five movements in the peak hours) and parking is provided in designated areas.

Swept path analysis has been provided to demonstrate that cars can pass as required along the access road. This is shown on drawing ITB19089-GA-007.

Drawing ITB19089-GA-004 and ITB19089-GA-006 demonstrate that a fire tender and delivery van can enter the site, turn and exit in a forward gear. This takes into account the on-street parking on the western side of Whitehall Lane. Appropriate provision has therefore been provided for delivery vehicles which will visit the site on a regular basis and for a fire appliance which may need to access the site in the event of an emergency.

At present, refuse vehicles reverse from Whitehall Lane onto Whitehall Works to collect bins from the adjacent flatted development. The image below shows the bin lorry having reversed to collect the bins. It is proposed that this arrangement will continue for the proposed development.



[Current bin collection arrangement](#)

A bin collection point has been provided to the south of Whitehall Works as shown on the site layout plans submitted for determination. This is within a short walk (less than 25m) of the rear of the refuse collection vehicle as shown on drawing ITB19089-GA-005. It is proposed that residents will take their bins from their individual bin stores (which are incorporated on the frontage of the properties) to the bin collection point on collection day.

Three of the properties are within 30m and the remaining properties will need to move bins slightly further. This is a short additional distance and bin carry distances of this length are very common. Moreover, this additional carry distance will not impact on the Council's refuse collection team, as it will be residents who need to move bins slightly further than 30m.

### Cycle Parking

Thurrock Council's cycle parking standards require the provision of one long stay cycle space and one visitor cycle parking space per dwelling. A secure cycle store has been provided for 12 bikes and this is conveniently located to the north of the proposed dwellings (for anyone arriving and departing the site). This is shown on the site layout plans submitted for determination. Cycle parking has therefore been provided in accordance with standards.

Thurrock Council's car parking standards vary depending on the type of dwelling provided (i.e. flat or house) and the accessibility of the site to a town centre or public transport. Separate standards are also provided for visitor and unallocated parking. The site is located in the 'medium accessibility' zone and on the basis of the parking standards, 15 car parking spaces should be provided (i.e. 2 spaces per dwelling plus 3 spaces for visitors). Three spaces out of the overall provision should also be designed for blue badge holders. This level of parking (i.e. 15 spaces including three blue badge spaces) is shown on the site layout plan.

Standard parking spaces should be 2.5m x 5.5m and a blue badge space needs to be 5.5m x 2.9m with a 1m access aisle. The design of the spaces shown on the site layout plan submitted for determination comply with these requirements.

The Building Regulations require one electric vehicle charging point to be provided per dwelling. A total of six spaces on the site will therefore be provided with an electric vehicle charging point. This level of provision exceeds the level set out in Thurrock Council's parking standards.

An appropriate level of car parking has therefore been provided and the car parking has been designed in accordance with the appropriate standards.

It is proposed to re-use Whitehall Works to provide access to the site. The access has an established level of use and there have been no accidents in the vicinity of the access in the most recent five-year period. Appropriate visibility can be achieved at the junction with Whitehall Lane and along the length of the proposed street providing access to the site.

The access is proposed in the form of a shared surface and complies with the recommendations in Manual for Streets for when a shared surface arrangement is acceptable. An appropriate level of cycle parking and car parking has been provided and adequate provision has been made for servicing.

Based on the traffic survey of the existing access and the traffic generation of the proposed new houses, the net impact of the development is as follows:

A reduction in traffic movements in the morning period of circa 10 vehicles – this equates to circa three fewer vehicle movements per hour; and

An increase in traffic movements in the evening period of circa three vehicles – this equates to one additional vehicle movement per hour.

The redevelopment of the site will therefore result in a modest reduction in the level of traffic generated in the morning period and a modest increase in the level of traffic generated in the evening period.

The existing use on the site generates circa 18 movements in the morning period and five movements in the evening period. The proposed development at the site is likely to generate circa seven - eight two-way vehicle movements in the morning and evening periods. The redevelopment of the site will therefore result in a modest reduction in the level of traffic generated in the morning period and a modest increase in the level of traffic generated in the evening period. This will not have a noticeable impact on the operation of the highway network.

Overall, the proposal is acceptable from a highways and transport perspective.

### **Impact Upon Ecology and Biodiversity**

The site is currently used as a builders' yard and comprises hard surfacing, small buildings and material storage. There are no trees or vegetation of any quality that would be affected by the proposed scheme

The landscaping plan, as before, would propose to remove the existing hard surface from the garden areas, replacing with a minimum of 200mm of topsoil.

The Council's Landscape and Ecology Advisor raised no objections previously to the proposal, however a condition requiring a more detailed landscape specification was requested.

A similar condition requiring details of hard and soft landscape elements together with a landscape specification which includes details of ground preparation in the soft landscape areas was also considered appropriate.

Our client is happy for similar conditions to be imposed in this case subject to a grant of permission.

### **Ground Contamination**

Due to the site's history, an intrusive investigation is necessary to determine the degree of land contamination. It is anticipated that this can be controlled via a condition, subject to a grant of permission.

### **Viability and Planning Obligations**

There are no planning contributions or affordable housing required as the proposal falls short of the central government threshold of 10 units or more.

### **Conclusion**

The proposed development has been designed specifically to address the concerns raised by the planning team under the previous planning consent. A new architectural team, planning team, transport and noise consultant have been employed to design a scheme which overcomes the previous reasons for refusal which were issued under application 20/00108/FUL.

The scheme has been reduced in scale from what was proposed previously. This reduction, we feel, has served to address officers concerns regarding the cramped form of development.

The loss in units has allowed the layout to accommodate additional parking, cycle parking and increased separation distances to the adjoining properties.

The outdoor amenity space, by virtue of its location adjacent to the residential development to the west, ensures that a high standard of amenity space is created to serve future occupiers whilst ensuring that the surrounding commercial uses will not be affected.

The additional information submitted within the detailed Transport Statement addresses the previous concerns raised by the Highways Officers. And additional parking, cycle parking and electric charging points have been provided to meet the Council's parking standards.

For the reasons outlined in this statement, we respectfully request that the proposed development is approved.

We look forward to discussing the proposal with you.