

Section 55 Town and Country Planning Act

Planning Statement

Site: 338 Leagrave Road, Luton, Bedfordshire LU3 1RE

Proposal:

Proposed ground floor reinstatement of original 2 units, 2 bed flat with office to first floor and demolition of extant buildings used in connection with tyre business.

Client: HBK Investments Ltd



Site Google Maps



Site Information

Consultant	Visionary Planning Uk
Client	HBK Investments Ltd
Site Address	338 Leagrave Road, Luton LU3 1RE
LA	Luton
Description of Development	Ground floor reinstatement of original 2 units, 2 bed flat with office to first floor and demolition of extant buildings used in connection with tyre business.
Pathway (PD/Application/Appeal)	Full application

Constraints Review

Flood Risk Zone	Flood Zone 1
Contaminated Land	None known
Tree Preservation Order	None known
Heritage Assets	None
Noise Abatement Areas	None known
Explosive Hazard Areas	Unknown
Area of Outstanding Natural Beauty	No
Special Protection Area	No
Site of Special Scientific Interest	No
RAMSAR Convention Site	No
Site of Importance to Nature Conservation	No

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Article 4(2) Directions

No

Local Policy Requirements

Local Plan/Core Strategy

Luton Local Plan (2011-31)

Effective Policies in Development Control

Policy LLP1 - Presumption in Favour of Sustainable
Development
Policy LLP14 Existing Employment Areas
Policy LLP15 - Housing Provision
Policy LLP16 - Affordable Housing
Policy LLP21 Hierarchy
Policy LLP25 - High Quality Design
Policy LLP31 - Sustainable Transport Strategy
Policy LLP32 - Parking
Policy LLP37 - Climate change, carbon and waste reduction
and sustainable energy

National Planning Policy Framework 2019 (NPPF)

Section 2. Achieving sustainable development
Section 5. Delivering a sufficient supply of homes
Section 9. Promoting sustainable transport
Section 11. Making effective use of land
Section 12. Achieving well-designed places

SPG/SPD's

Planning History

CONSTRUCTION OF A STAIRCASE TO FIRST FLOOR FLAT

338 Leagrave Road Luton LU3 1RE

Ref. No: 86/00200/FUL | Received: Tue 23 Sep 1986 | Validated: Tue 23 Sep 1986 | Status: PER – Application Permitted

SECTION 32 APPLICATION CONTINUED USE WITHOUT COMPLIANCE WITH CONDITION 2 OF PLANNING PERMISSION 28963 DATED 10/03/82

338 Leagrave Road Luton LU3 1RE

Ref. No: 83/00247/FUL | Received: Mon 28 Nov 1983 | Validated: Tue 29 Nov 1983 | Status: REF – Application Refused

USE OF WAREHOUSE FOR WHOLESALE AND RETAIL SALES WITH ANCILLARY STORAGE AND WORKSHOP FACILITIES

338 Leagrave Road Luton LU3 1RE

Ref. No: 81/00230/FUL | Received: Fri 07 Aug 1981 | Validated: Mon 10 Aug 1981 | Status: REF – Application Refused

Several pre application submissions

August 2023

Report Date

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Introduction

1.1 The application site is an extended two storey building located on the corner of Leagrave Road and Tudor Road, close to the traffic light interjunction with Woodland Avenue. The main building in retail use and the single storey rear outbuildings used as tyre repair facilities. The surrounding area is a mixture of commercial and residential uses and currently looks visually detrimental to the streetscene.

The property comprises a two storey semi detached property which was probably originally constructed around the 1930s.

The property was originally built as a traditional corner shop with residential accommodation above and a garden area to the rear along with a garage and storage building.

The ground floor accommodation has now been sub-divided into three small retail units with a self-contained residential flat created above which has its own rear external staircase access.

The rear yard and outbuildings are being used as a tyre repair premises.

The accommodation currently comprises:

Shop 1- (key cutting): 338B Leagrave Road retail area 155 sq ft with small toilet to the rear

Shop 2 – (letting agent): 338C Leagrave Road retail area 190 sq ft

Shop 3 – (vacant): 338 Leagrave Road retail area 270 sq ft

Outside:

rear open covered yard and dilapidated outbuildings

First Floor Flat – (338A Leagrave Road): entrance porch, bathroom with wc, kitchen, lounge, bedroom 1, bedroom 2

1.2 The proposal seeks the reinstatement of original 2 units at ground floor level (currently subdivided into 3 *units without consent*), and a 2 bed flat with office to first floor and demolition of extant buildings used in connection with tyre business. The use classes are as yet undefined but likely to be retail.

1.3 It is not proposed to increase the retail element from what is currently extant. Therefore, there is no requirement for a sequential test. The vitality and viability of designated shopping areas would not be adversely affected by the development either on its own or in combination with other proposals or commitments.

1.4 It is noted that Policy LLP15 of the adopted local plan supports residential development on sites not allocated for housing provided that the proposal would not lead to the loss of other uses for which there is a recognised local need and would not result in over-intensified use of the site. This policy also requires new housing development to achieve a mix of different sizes, types and tenures to meet the housing needs of Luton and the Luton Housing Market Area as informed by the Strategic Housing Market Assessment (SHMA). It is proposed that the site can accommodate one 2 bed flat that meets NSS.

1.5 It is also considered that the loss of the existing tyre use can be justified. It is a visual eyesore, noisy and dirty and this type of Sui Generis use is not acceptable in a residential area. It is better suited to being in an industrial park where there are no residential properties affected by noise, dust and dirt emissions.

2.0 Local Development Framework

National Planning Policy Framework

Policies are in précis form where appropriate.

2.1 The NPPF through Paragraph 2 outlines that at its heart there is a presumption in favour of sustainable development.

2.2 Paragraph 2 outlines that there are three dimensions to sustainable development – an economic, social and an environmental role.

2.3 Paragraph 11 states: Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

2.4 Decision-making NPPG July 2021 The NPPF para. 38 strengthens the previous NPPG Para's 186 and 187 emphasising that LPA's should look for solutions rather than problems stating:

38. 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

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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

2.5 Section 5, Paragraph 60 Delivering a sufficient supply of homes states:

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Identifying land for homes paragraph 68 states

68. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period. With an appropriate buffer, as set out in paragraph .*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*

c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;

2.6 Building a strong, competitive economy para 81 states:

81. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation⁴², and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

82. Planning policies should:

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;

2.7 Section 7 Para 86 Ensuring the vitality of town centres

86. Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;

f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

2.8 Section 11 Making effective use of land states:

119. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Local Policy

2.9 On 7 November 2017, Luton Borough Council met and resolved to adopt the Luton Local Plan (2011-2031) with Main Modifications in accordance with:

the provisions of the Planning and Compulsory Purchase Act 2004 (as amended) Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) Regulations 17, 26 & 35

The Environmental Assessment of Plans and Programmes Regulations 2004 regulation 16.

2.10 Policy LLP1 reasserts the Governments golden thread for achieving sustainable development and states:

Policy LLP1 - Presumption in Favour of Sustainable Development

A 'presumption in favour of sustainable development' will be applied to development management decisions.

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Wherever possible, the Council will work proactively and positively with all applicants to help shape development proposals to deliver growth and sustainable development that can be approved without delay.

A. Planning permission will be granted where applications accord with local plan policies (and, where relevant, with policies in neighbourhood plans) when taken as a whole, unless other material considerations indicate otherwise.

B. The Council will require all new development in the borough to contribute to enhancing a sense of place, preserve or improve the character of the area.

Development proposals should respond to and enhance local character, the natural environment, heritage assets, and the identity of the Borough.

The Council will seek to encourage growth and sustainable development and manage change so as to create a network of connected, sustainable, high quality, locally distinctive and healthy places.

Growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided the growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2031. The Strategic Allocations and Luton Town Centre will be the primary location for growth, with District and Neighbourhood Centres also playing a substantial role as the heart of the communities of Luton (see the Key Diagram).

Sustainable Development Principles

To enable the delivery of sustainable development and sustainable communities, all development proposals will, where applicable, have regard to

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relevant plan policies.

2.11 Policy LLP14 - Employment Areas

Category A

The existing employment areas (Category A) set out in Appendix 3 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. Once developed, strategic allocations containing B1, B2 or B8 uses are safeguarded as Category A employment areas. Changes of use or redevelopment within the employment areas and sites that would result in a loss of floorspace for economic development uses will be resisted.

A. Redevelopment, extensions and intensification in these areas that would result in additional floorspace for B1, B2 or B8 uses will be supported provided that:

- i. it would not have unacceptable amenity or traffic implications;
- ii. an appropriate size and range of units is provided; and
- iii. appropriate levels of parking are provided.

Category B & Existing Unidentified Employment Sites

B. Redevelopment, extensions and intensification in Category B and existing unidentified employment sites that would result in additional floorspace for B1, B2 or B8 will be supported in accordance with clauses i to iii of part A (above). Where a building or site within a Category B or unidentified employment site has been vacant for at least twelve months, a mixed use development that retains significant employment or alternative redevelopment to non B uses to meet identified needs will be permitted where:

- i. it can be demonstrated that suitable alternative accommodation at comparable rents is available; and
- ii. it can be demonstrated that it is no longer suitable or viable for B1, B2 or B8 uses and where the site is vacant, there is evidence of active marketing for a reasonable period.

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2.11.1 It should be noted that whilst the current Sui Generis use which operates to the rear of the site may have an established use, this has not been tested by the submission of a lawful use certificate application. It is also not a use appropriate for a residential area. It is a use that would be better suited on an industrial estate which can accommodate a high degree of traffic generation and noise emissions which are incompatible to a residential area.

2.12 Policy LLP15 states:

Policy LLP15 - Housing Provision

Provision will be made for 8,500 dwellings in the borough to help meet the housing needs of Luton and the Luton Housing Market Area ensuring the size, type and tenure (including provision for starter homes, custom build and households with specific needs) provided reflects the identified housing need requirements of the area in the Strategic Housing Market Assessment (SHMA).

A. Planning permission will be granted for residential development and mixed-use schemes on allocated sites in line with Appendix 4.

B. Planning permission for residential development will also be granted on sites not allocated for housing provided that it would not lead to a loss of other uses for which there is a recognised local need.

C. Demolition and redevelopment of existing housing to other uses will be permitted provided that replacement dwellings are provided on-site or off-site or there is an overriding need for other uses, which provide benefits to the community that outweigh the loss of housing for other uses, which provide benefits to the community that outweigh the loss of housing.

Higher densities will be encouraged within Luton Town Centre and the district and neighbourhood centres. New housing should not result in over-intensification of the site. Development will achieve a mix of different housing sizes, types and tenures informed by the latest housing market assessments and local circumstances.

2.12 Currently the existing residential accommodation on the upper level of this site does not meet National Space Standards and it is welcomed that this application creates an opportunity to remedy this by providing a modern, and well laid out living accommodation that provides an additional unit for residential use.

It is also noted that Policy LLP15 of the adopted local plan supports residential development on sites not allocated for housing provided that the proposal would not lead to the loss of other uses for which there is a recognised local need and would not result in over-intensified use of the site.

It is also noted that there has been a significant over-delivery of 1 bed units within the Borough, with delivery exceeding the identified need by over 1,800 units in the first 5 years of the 20 year plan period. The applicant has given consideration to this oversubscription to one bed flats and is providing a sought after 3 bed unit.

2.13 Policy LLP16 - Affordable Housing

Luton has an affordable housing need of 7,200 dwellings. The application of Policy LLP16 could help deliver around 1,700 affordable dwellings potentially leaving an unmet need of around 5,500 dwellings.

A. The Council will require the provision of 20% affordable housing units on developments that deliver a net gain of at least 11 dwellings and on sites of 10 dwellings or less that have a combined floorspace of more than 1,000sq.m.

B. Affordable housing should be provided on-site phased alongside market housing, indiscernible from and well integrated with market housing. An equivalent financial off-site provision will only be acceptable where there is robust justification for off-site provision.

C. Development proposals will need to ensure that the size, type and tenure of affordable dwellings provided reflects the identified housing need requirements of the

area (and in accordance with the Homes & Communities Agency space standards) in the Strategic Housing Market Assessment (SHMA) for future household types.

E. The Council will require that affordable housing be occupied by households who would not otherwise be able to afford to rent or buy a dwelling of sufficient size for their needs on the open market and who either:

- i. already live in the borough and are in housing need (as identified on the housing waiting list); or
- ii. can demonstrate a need to live in the borough.

2.13.1 This will be an open market dwelling as the scheme does not meet the provisions of the affordable threshold. However, the application does provide for a 2 bed dwelling which, as identified in the SHMA and meets the housing needs of Luton and Luton Housing Market area.

2.14 Policy LLP21 - Centre Hierarchy

Proposals for main town centre uses will address the identified scale of retail need over the plan period, distributed at a scale appropriate to the centre hierarchy functions, and the allocated Power Court and Northern Gateway retail developments (identified on the policies and inset maps), and be subject to the sequential test. This requires such uses to be located within town centres, then edge of centre locations and then, only if suitable sequentially preferable sites are not available, in out-of-centre locations. For all retail ('A' use classes), the extent of Luton town centre comprises the town centre shopping area, while the extent of the district and neighbourhood centres comprises the relevant shopping frontage. For all other main town centre uses, the extent of a centre is the wider boundary as marked on the policies map.

B. Applications for retail, leisure, and office development over 1,000sq.m. located outside of town centres, not in accordance with this Local Plan, are required to submit an impact assessment, as defined in the NPPF, to the Council.

C. The Council will grant planning permission for retail development, provided it is demonstrated that:

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- i. retail proposals meet the sequential test; and
 - ii. the vitality and viability of the town centre, and individually, each District and Neighbourhood centre in the borough would not be significantly adversely affected by the development either on its own or in promote jobs, leisure and the night-time economy.
- B. Within the premier, primary and secondary shopping frontages of the town centre shopping area, identified on the Policies Map, planning permission will be granted for the development of non-A1 town centre uses provided that the premises:
- i. are above ground floor level in the primary shopping area; or
 - ii. are at ground floor level in the primary shopping area, and the proposed use will not result in:
 - a. more than 10% of the relevant premier shopping frontage being in non-A1 use; or
 - b. more than 25% of the relevant primary shopping frontage being in non-A1 use; and
 - c. more than two adjacent units (of not greater than the normal frontage width) being in non- A1 retail use; and
 - d. the change of units in A1 use in part or whole where there are vacant non-A1 units within the same frontage.

2.15 Policy LLP25 - High Quality Design

Buildings and spaces will be of high quality design with distinctive character and be safe and easily accessed by all members of the community. Proposals will need to demonstrate adherence to the best practice principles of urban design to help create quality places in the Borough.

In particular, where the following design criteria are material to an application site, its context and development proposals, provision should be made to:

- i. enhance the distinctiveness and character of the area by responding positively to the townscape, street scene, site and building context, form, scale, height, pattern and materials, distinctiveness, and natural features including bio diversity;

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- ii. create or enhance attractive safe, accessible, and active open public spaces, creatively using hard and soft landscaping and public art for all members of the community;
- iii. provide continuity of built form, connectivity, active frontages, and enclosure;
- iv. optimise and improve accessibility to walking and cycling and connections to public transport, local services, open spaces, and community services and facilities;
- v. optimise higher densities and avoid backland development where it would give rise to averse amenity whilst meeting the other requirements of this policy;
- vi. provide green infrastructure and measures to protect, conserve, or enhance natural assets and biodiversity;
- viii. reduce carbon emissions, risk of flooding, and increase energy and water efficiency and quality;
- ix. promote sport and physical activity and healthy communities (13);
- x. promote opportunities for reducing crime and anti-social behaviour;
- xi. deliver new housing in accordance with external amenity space standards set out in appendix 6, and minimises noise, overlooking and overshadowing/loss of light, address tall buildings and the protection of important views, and ensure access to storage and privacy;

2.15.1 It is considered that the design has been carefully addressed and the design is acceptable.

2.16 Policy LLP31 - Sustainable Transport Strategy

The strategy for sustainable transport in Luton is based on the vision for the Local Transport Plan 2011-2026, which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.

A. The Council will work with its partners, agencies and developers to deliver:

- i. reduced congestion around the town centre and key strategic routes including seeking to deliver targeted road and junction improvements needed to accommodate

Luton's growth including strategic and local improvements to address cross boundary growth while promoting sustainable modes of transport;

- iii. improved accessibility and connectivity for a more pedestrian friendly town centre environment for all users;
- iv. controlled parking within the town centre, district, and neighbourhood centres to support sustainable local service delivery, housing, and jobs, linked trips and accessible destinations;

B. Planning Permission will be granted for proposed developments that meet the criteria below, where these are relevant to the proposal:

- i. minimises the need to travel;
- ii. provides a sustainable transport choice with priority for buses, pedestrians, and cyclists;
- iii. reduces road congestion particularly at peak times;
- iv. reduces the safety risk to motor vehicles, non-motorised, and vulnerable users;
- v. provides cycle parking /storage; and
- vi. ensures the quality of the local environment is not compromised.

2.16.1 It is not considered that this scheme will have any detrimental impact on the highway nor impact pedestrians.

2.17 Policy LLP32 - Parking

Parking provision in Luton will be managed to ensure that a proportionate number of spaces are available to support the growth of the town centre.

A. Proposals for reducing on-street parking in and around the town centre and for car free development may be supported in areas of high public transport accessibility including when linked to park and ride facilities, provided that:

- i. there is no adverse impact on occupier amenity in other areas through displaced on street parking;
- ii. they are supported with a travel plan that promotes car clubs where feasible; and
- iii. the impact on short-term parking is minimised.

B. Development will be permitted providing that:

- i. car parking provision should not exceed the maximum standards set out in Appendix 2 in order to promote modal shift, however within those standards, sufficient parking should be provided to help ensure that adverse effects on highway safety and the convenience of nearby residents and users are avoided;
- ii. minimum cycle parking standards set out in Appendix 2 is provided for non-residential developments;
- iii. cycle storage of an appropriate standard is provided for residential developments; and
- iv. parking standards shown in Appendix 2 are minimised in identified areas demonstrated to be of high accessibility.

2.17.1 It is considered that the proposal is acceptable and meets policy requirements. Covered bike storage is provided as well as an electric charging point.

2.18 Policy LLP37 - Climate change, carbon and waste reduction and sustainable energy

The Council will support development proposals that contribute towards mitigation, and adaptation to climate change through energy use reduction, efficiency, and renewable, and decentralised energy.

A. New residential development will be encouraged to exceed the national standards set out in Building Regulations on carbon and energy performance. The energy hierarchy set out under LLP37 C provides principles on how Building Regulations could be achieved and exceeded.

B. All new non-residential developments over 1,000 square metres will be required to achieve the 2013 Building Research Establishment Environmental Assessment Method (BREEAM) 'Good' status".

C. Energy Hierarchy:

- i. consider reducing energy and water demand;
- ii. consider energy generation from low and zeros carbon sources on site;
- iii. consider decentralised energy networks and generation; and
- iv. consider off-site solutions, retro fitting, and carbon reduction schemes.

D. All residential developments will achieve a water efficiency standard of 110 litres per person per day because Luton is in an area of water stress.

Waste

The Council encourages an overall reduction in the amount of waste generated, treated and disposed of to reduce the need for land for waste management. Proposals that are likely to generate significant volumes of waste through development or operational phases will be required to include a waste audit as part of the application.

3. **The Proposal**

The proposal seeks to change the layout of ground floor from 3 units back to 2 units as it was originally. Following a pre application response, changes have been made to the submission. The first floor flat, having 2 beds and office space comprises 86m² It now has an external staircase and amenity space. The buildings used in connection with the tyre business will be demolished as the tyre business is relocating to a more suitable location (the tyre business has not planning consent nor does it have a lawful use certificate). The design has been modified in response to the pre application. Covered bike and bin storage is shown on the submitted plans along with an EV charging point.

4. Conclusion

4.1 The massing which was an issue previously for the officer who dealt with the Pre application (Naila Malik) has been reduced. It is now considered that the principle of development and the site redesign is acceptable.

4.2 The site has been designed with the consideration to street scene impact and design implications, impact on adjoining owners, suitability of the living environment created and parking/highway implications.

4.3 It is now considered that it meets the policies within this statement and is compliant. Whilst Policy LLP14 seeks to protect existing employment areas for B1, B2 and B8 uses unless they are longer suitable or required for those uses. The current tyre business requires more space to operate at it's optimum than the current site can offer. It is also considered that the site needs redeveloping as it is in a very prominent position occupying a corner plot, the enhancement of which can only be beneficial to the area.

4.4 It is fully compliant with Policy LLP1, LLP 15, LLP21 and LLP25 where in accordance with the latter LLP25 the development proposals should enhance the distinctive character of the area responding positively to the townscape, street scene, site and building context, distinctiveness; provide new housing in accordance with Appendix 6;

4.5 With regards to Policy LLP31, there will be far less traffic implications to the highway network as there will be less traffic visiting the site.

4.6 It is also compliant with LLP32 which seeks to manage parking provision to support growth.

4.7 Reverting the retail element from 3 to 2 units will provide more usable retail space as the current split is too small to attract retail occupants.

4.8 It is considered that the reduction of one small retail unit will have little impact on the vitality and viability of designated shopping areas and would not be adversely affected by the development either on its own or in combination with other proposals or commitments.

4.8 It is hoped that a positive response will now be received.



