

PLANNING COMMITTEE ADDENDUM

2.00PM, WEDNESDAY, 2 DECEMBER 2020

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ADDENDUM

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2nd December 2020 Planning Committee – Additional Representations

Item	Site Address	Application No.	Comment
A	Coombe Farm, Westfield Avenue North	BH2020/00002	<p>1. S106 Heads of Terms – Updates:</p> <p>Additional Heads of Terms:</p> <p><i>‘Local Equipped Area for Play’ or ‘LEAP’ means an area of open space specifically designated and laid out with features including equipment for children who are beginning to go out and play independently close to where they live.</i></p> <ul style="list-style-type: none"> ▪ to manage and maintain the relevant an open amenity or recreation area in perpetuity ▪ a management plan for the long-term future maintenance and management of the LEAP ▪ submission and written approval of the Council for a detailed scheme for the provision of the LEAP to include layout, provision of equipment and maintenance ▪ to permit the Council its agents and its surveyors access to inspect the relevant part of the LEAP ▪ the Owner shall be liable for the full maintenance cost of the LEAP and the Owner shall at its own expense and at no expense to the Council and to the reasonable satisfaction in all respect of the Council <p>2. Conditions</p> <p>There are a number of alterations, additions and omissions to conditions to ensure there are no duplications, change the trigger and insert necessary items. These recommended changes are considered appropriate, and are set out below:</p>

			<p>*changes are in <u>underlined</u>*</p> <p>Amended conditions:</p> <p>Condition 9 should read: Notwithstanding the plans submitted, no development above ground floor slab level shall commence until a scheme detailing the design of internal streets and spaces has been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The submitted scheme shall include full details of the following:</p> <ul style="list-style-type: none">I. Geometry and layout, including dimensions and visibility splaysII. Pavement constructions and surfacing, kerbs and edge restraintsIII. Levels and gradientsIV. LightingV. DrainageVI. Street furnitureVII. Trees, other planting, growing media and planting aidsVIII. Traffic signs and road markings. <p>The scheme shall include a completed Road Safety Audit up to stage 2 in accordance with the Highway Authority's standards at that time, with the Highway Authority acting as Overseeing Organisation. The Road Safety Audit Brief and Report, and all other road safety audit documents, shall be submitted with the scheme for approval.</p> <p>If the scheme proposes that any areas are shared between pedestrians and vehicles or where recommendations in Guidance On the Use of Tactile Paving Surfaces are not met then relevant disabled user groups (and/or national organisations representing them) shall be engaged as part of the design development process and the submitted scheme shall include both of the following.</p>
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			<p>a) A Participative Inclusive Design Statement. This shall: explain the engagement undertaken with disabled user groups during the design development process; record their views and suggestions on the different options; and explain how these have shaped the submitted design proposals and other management plans. Where it has not been considered possible to accommodate views and suggestions in the submitted proposals and plans then the reasons for this shall be detailed.</p> <p>b) An Equality Assessment. As a minimum this shall identify and explain: each adverse impact arising from the proposals for different protected character groups; how these are known (which may be from appropriate consultation/engagement, research or guidance relevant to the protected character groups impacted); the alternatives considered to avoid or minimise these impacts; and, where some residual adverse impact remain, the objective justifications for why complete avoidance is not considered possible and why the scheme should nonetheless be considered acceptable.</p> <p>The approved scheme shall be implemented prior to first occupation <u>of that phase</u> of the residential development and shall include the implementation of the recommendations of the stage 3 Road Safety Audit, with the Highway Authority acting as Overseeing Organisation. Thereafter the approved scheme shall be retained in use at all times, except that a further stage 4 Road Safety Audit shall be undertaken if any road traffic collisions are recorded within the 12 months of validated collision data available after scheme opening and the recommendations of that shall be implemented.</p> <p>Reason: In the interest of highway safety, inclusivity, sustainability, quality design, the historic environment and public amenity and to comply with policies TR7, TR11, TR12, TR14, TR15, TR18, SU3, SU5, QD1, QD2, QD3, QD14, QD20, QD25, QD26, QD27 and HE6 of the Brighton & Hove Local Plan and SA6, CP7, CP9, CP12 and CP13 of the Brighton & Hove City Plan Part One, and National Planning Policy Framework paragraphs 108-110.</p>
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			<p>Condition 13 should read: Prior to occupation of <u>any phase</u> of development a Scheme for Crime Prevention Measures for the development shall be submitted to and approved in writing by the Local Planning Authority. The agreed crime prevention measures shall be implemented and retained within the development thereafter. Reason: In the interests of crime prevention, to comply with policy CP12 of the Brighton and Hove City Plan Part One.</p> <p>Condition 14 should read: Prior to first occupation details of <u>any</u> photovoltaic array shall be submitted to and approved in writing by the Local Planning Authority. The photovoltaic array shall then be installed in accordance with the approved details and retained as such thereafter. Reason: To ensure that the development is sustainable and makes efficient use of energy, water and materials and has an acceptable appearance and to comply with policies CP8 and CP12 of the Brighton & Hove City Plan Part One.</p> <p>Condition 32 should read: Prior to <u>any phase</u> of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation <u>for that phase</u> shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. Reason: This development lies in a sensitive location in terms of controlled waters as it is within a source protection zone 3 and on a principal aquifer. This condition is required to ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.</p> <p>Condition 34 should read:</p>
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			<p><u>No above ground development</u> shall take place until a feasibility study has been submitted to and approved in writing by the LPA (Local Planning Authority) for communal or individual air source heat pumps system to be used as the heating technology across the site. The agreed system shall be implemented within the development unless it can be proven not technically feasible or financially viable. Reason: to comply with Policy CP8 (Sustainable buildings) of Brighton & Hove City Plan Part One.</p> <p>Deleted conditions:</p> <p>Delete condition 10, as this will now be secured by s106 agreement. Condition 10 to be deleted reads: No development above ground floor slab level of any part of the development hereby permitted shall take place until details of active play and learning equipment to be provided in the equipped area/s of play shall be submitted to and approved in writing by the local planning authority. The approved equipment shall be installed before the first occupation that phase of the development or its completion, whichever is sooner and thereafter retained. Reason: To ensure the provision of satisfactory equipped area/s of play and for the amenities of the development, in accordance with the provisions of policy HO5 the Brighton & Hove Local Plan and Policy CP10 of the Brighton & Hove City Plan Part One.</p> <p>Delete condition 21 which is secured by condition 19 which reads: Prior to any development above ground floor slab level details of secure, accessible and inclusive cycle parking facilities for the residents of the development and their visitors, and the management thereof, shall have been submitted to and approved by the Local Planning Authority in consultation with the Local Highway Authority. The cycle parking facilities shall be implemented in accordance with the approved scheme and made available for use prior to first occupation of the development. Thereafter</p>
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			<p>they shall be retained in use at all times for residents and their visitors only and managed in accordance with the approved scheme.</p> <p>Reason: To ensure that adequate cycle parking facilities are provided, to encourage travel by sustainable modes, and to comply with policy TR114 of Brighton & Hove Local Plan policy, policy CP9 of the Brighton and Hove City Council City Plan Part One, SPD14 Parking Standards, and National Planning Policy Framework Paragraphs 108 and 110.</p> <p>The first sentence in Condition 38 which reads ‘Compliance with existing detailed biodiversity method statement, strategies, plans and schemes’ should be deleted. The condition itself which seeks secure all ecological measures shall remain.</p> <p>Late Objections</p> <p>2 additional representations have been received, objecting on the following grounds:</p> <ul style="list-style-type: none"> • Lack of infrastructure • Overdevelopment • Narrow access road • Congested roads & buses • Construction Traffic • Insufficient parking • Light pollution • Flooding • Lack of community facilities • Affordability <p>Officer Comment: These issues have been fully considered in the committee report.</p> <p>Clarification within the report:</p> <p>Paragraph 9.133 of the report states “<i>All parking spaces will have Electric Vehicle Charging Points (EVCP),</i>” – this should read “<i>All <u>on plot</u> parking spaces will have Electric Vehicle Charging Points (EVCP),</i>”</p>
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B	The Meeting House, Park Close	BH2020/01742	<p>Additional condition: 28. Notwithstanding the approved plans, the development hereby permitted shall not be first occupied until 1 no. on-site disabled car parking space has been implemented and made available for use. The disabled parking facilities shall thereafter be retained for use at all times.</p> <p>Reason: To ensure the development provides for the needs of disabled occupants and visitors to the site and to comply with policy TR18 of the Brighton & Hove Local Plan and SPD14: Parking Standards.</p> <p>Additional Informatives: 9. In order to be in line with Policy TR14 Cycle Access and Parking of the Brighton & Hove Local Plan 2005 cycle parking must be secure, convenient, accessible, well lit, well signed, near the main entrance, by a footpath/hardstanding/driveway and wherever practical, sheltered. The Highway Authority approves of the use of covered, illuminated, secure 'Sheffield' type stands spaced in line with the guidance contained within the Manual for Streets section 8.2.22 or other proprietary forms of covered, illuminated, secure cycle storage including cycle stores and "bunkers".</p> <p>10. The applicant is advised that the disabled car parking spaces should be designed in accordance with Department for Transport produced Traffic Advisory Leaflet 5/95 Parking for Disabled People. This requires a 1.2m clear zone to both sides of the bay.</p>
G	22 Crescent Road	BH2020/01986	A further six letters of objection from neighbours have been. These raise issues already covered by previous comments from other respondents, that have been addressed and considered as part of the report.
I	11-12 Rock Place	BH2020/01505	This item has been deferred from the agenda.

Planning Committee 2 December 2020 – Member Questions

Item A:
BH2020/00002
Coombe Farm, Westfield Avenue

1 Why can't the CIL amount be agreed in advance of planning permission?

The committee have been provided with an estimated range of what CIL will be due as we have not yet been able to confirm with the applicant whether certain existing buildings on the site have been in their lawful use for at least 6 months in the last 3 years. If any/all of them have been (even partially), this enables the applicant to have the space omitted from the CIL levy calculations. In the case of this site, this is not insignificant due to the size of some of the farm buildings that exist on the site (hence the variance).

The estimated value of CIL payment is being included in reports for planning committee members information, however, as it is a non-negotiable tariff applied through a legislative charging model, it is not a major planning consideration that the committee can take into account when making their decision.

The estimate will be updated up to the point when the developer advises us of forthcoming commencement on site; at which point we will calculate the final CIL charge and issue our demand notice for payment. This process is different from that for S106, where all matters have to be agreed prior to planning permission being granted.

Information on CIL and S106 income and expenditure will be available to members, developers and the general public from early in 2021, once the public facing module of the new Exacom system is commissioned.

2	Can we see a breakdown of how both sums would be allocated?	<p>The sums would be allocated in accordance with the CIL Regulations as follows:</p> <table border="1" data-bbox="860 233 1789 371"> <thead> <tr> <th></th> <th>Strategic CIL Pot (80%)</th> <th>Neighbourhood Pot (15%)</th> <th>Administration (5%)</th> </tr> </thead> <tbody> <tr> <td>£335,682</td> <td>£268,546</td> <td>£50,352</td> <td>£16,784</td> </tr> <tr> <td>£788,926</td> <td>£631,141</td> <td>£118,339</td> <td>£39,446</td> </tr> </tbody> </table> <p>Governance arrangements for approving expenditure from the strategic and neighbourhood pots (excluding in Rottingdean Parish Council) will be considered through a report to TECC committee in June 2021. Some of the needs highlighted may also be supported through existing S106 funding from other developments already approved.</p>		Strategic CIL Pot (80%)	Neighbourhood Pot (15%)	Administration (5%)	£335,682	£268,546	£50,352	£16,784	£788,926	£631,141	£118,339	£39,446
	Strategic CIL Pot (80%)	Neighbourhood Pot (15%)	Administration (5%)											
£335,682	£268,546	£50,352	£16,784											
£788,926	£631,141	£118,339	£39,446											
3	In section 1 the items above are listed under the “Section 106 Head of Terms” but would the amounts come from the CIL amounts listed in section 11?	These items remain within the scheme for S106 and therefore are payable by the developer (or paid for direct) in addition to their CIL liability.												
4	Is the Travel Plan money to come from the CIL money referenced in section 11?	<p>The travel plan will not come from CIL and will be a separate s106 planning obligation.</p> <p>The travel plan mirrors the travel plan in the extant scheme.</p> <p>The travel plan would include the following:</p> <ul style="list-style-type: none"> ▪ A Residential Travel Plan document ▪ Provision of a Travel Pack to each first new resident, which shall include information on local options for sustainable transport and arrangements to get support ▪ Providing the first resident 2 free bus passes of 12 months duration or a voucher for £200 to be redeemed against the purchase of a bicycle 												
5	Who would pay for maintenance and future replacement of the children’s play equipment?	The space will remain in private ownership and the maintenance /replacement of the facilities will be the responsibility of the developer (or their successor.) They may choose to include this requirement in the scope of the services being proposed for the management of the estate roads, which will also be retained as private.												

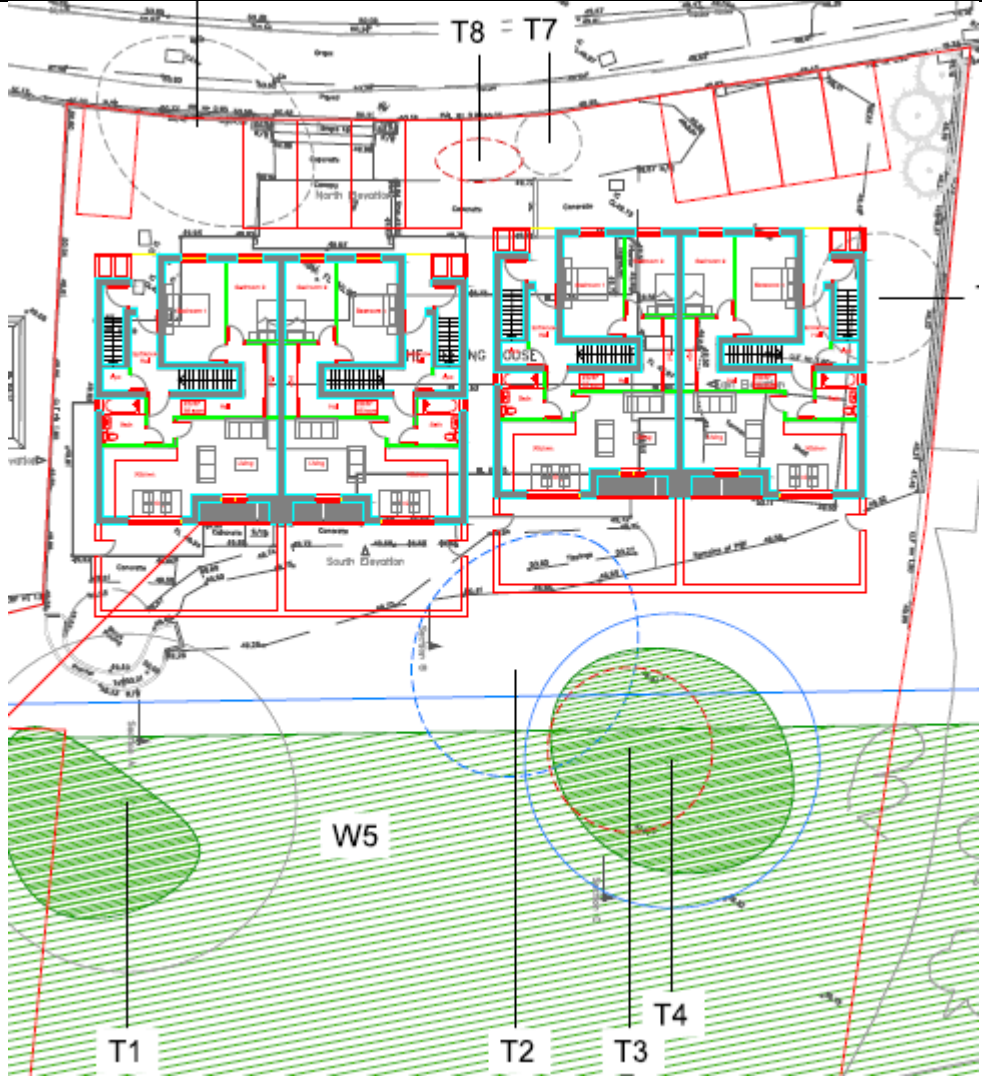
6	Does BHCC require advance upkeep funding for the play equipment? If so, how much and for how long?	<p>The developer/owner will maintain the play area including the equipment in perpetuity.</p> <p>A Local Equipped Area for Play' or 'LEAP' obligation has been added to the s106 Heads of terms (please see late list) to ensure and secure the following:</p> <ul style="list-style-type: none"> ▪ the Owner shall be liable for the full maintenance cost of the LEAP and the Owner shall at its own expense and at no expense to the Council and to the reasonable satisfaction in all respect of the Council ▪ the Owner shall manage and maintain the play area(s) in perpetuity ▪ a management plan for the long-term future maintenance and management of the LEAP shall be provided ▪ submission and written approval of the Council for a detailed scheme for the provision of the LEAP to include layout, provision of equipment and maintenance ▪ the Owner shall permit the Council its agents and its surveyors access to inspect the relevant part of the LEAP.
7	Transport - Why is there is no discussion about the impact of this development on the A259 and B2123?	<p>Transport officers do not consider that it would be reasonable to require this to be considered given the number of additional vehicle trips that the site is forecast to generate.</p> <p>The Council's Highways response (Highway Observation 2 - 02/09/20) states:</p> <p><i>In consideration of the area and that this site will not generate more than 1 vehicle trip every 90, we are happy that it will not cause a significant impact on the public highway or local junctions and we do not seek for additional traffic distribution assessments or junction modelling. A minor scheme for necessary improvements to junction of the access road with Westfield Avenue North will suffice and this can be secured by obligation.</i></p>
8	We have lost much-needed infrastructure which were included in the original 106 agreement:	<p>Transport Officers have not considered it reasonable to require direct works or contributions via S106 obligations.</p>

	<p>- Real-time bus information boards at Coombe Vale - Real-time bus information boards at Saltdean Vale shops</p> <p>Can these be re-instated? Should we do that as a condition at the meeting?</p>	<p>As part of implementing CIL, the council decided to roll back some of its existing S106 requirements, especially for off -site contributions for education, open spaces and sustainable transport. These items of infrastructure are neither on site nor directly related to the Coombe Farm development and are therefore ineligible for inclusion in the S106 agreement.</p> <p>The council also cannot attach a condition to a planning approval which requires an applicant to make a financial payment.</p> <p>The route to address these needs is through the use of existing funding that the LHA has available for public transport infrastructure, possible use of existing S106 funds provided by existing permitted developments or future bids to either the Strategic or Neighbourhood CIL pots.</p>
9	<p>The sustainable transport section also states that the sustainable transport contribution will “address the causes of delay along...routes to the east of the city”.</p> <p>This is a huge, long overdue and much-needed project. Please provide details of what will happen with timings.</p>	<p>The applicant has proposed the following timeframe:</p> <p>“- <i>Start on site around March/April 21</i> - <i>Duration of the construction works –circa 27 months (117w)</i> o <i>Demolition and earthworks – 5 months</i> o <i>Release of first phase for occupation – month 20th</i> o <i>Release of the last phase for occupation – month 27th</i></p> <p><i>CIL payments would commence in Spring 2021, in line with the Council’s instalments policy”.</i></p>
10	<p>When will a full Traffic Assessment be provided?</p>	<p>A full Transport Assessment has been provided and Transport Officers are satisfied that it sufficiently assesses all likely impacts of the proposed development.</p> <p>The Road Safety Audit Stage 2 is undertaken alongside the detailed design of the layout. Condition 9 requires the detailed design of the highway elements of the scheme and the Stage 2 RSA to be submitted and approved prior to any development above ground floor slab level.</p>

		<p>The applicant has stated “<i>However, in practice we will commence with detailed design work as soon as planning permission is granted and submit the Stage 2 RSA as soon as it is ready, prior to the clearance of condition application. We are currently aiming to submit this application in February/March 2021</i>”.</p>
11	<p>Please provide evidence that “there are sufficient primary places in this part of the city”.</p>	<p>Please see comment and information from Gillian Churchill, Head of Education Capital:</p> <p><i>“In terms of school places I can say that overall at the present time primary numbers in the city are falling which means that we have an increasing number of surplus places citywide. As a result of this we are currently consulting on a proposal to reduce the number of school places in the primary sector by 8 forms of entry across the city. The following link will take you to the consultation</i></p> <p>https://www.brighton-hove.gov.uk/schools-and-learning/school-applications/school-admissions-consultation</p> <p><i>For the purpose of forecasting future pupil numbers we divide the city into 8 planning areas and compare the number of school places available in the planning area with the number of children registered as living in that planning area on GP registration data.</i></p> <p>[Please see the school data table which has been added into the Powerpoint presentation (due to the size of the table)]</p> <p><i>This table shows the data for the Deans planning area which is where the Coombe Farm development is proposed. We are not proposing any changes to the Published Admission Number (PAN) of any schools within this planning area as part of the current proposals. However, as the table shows, we do still have quite a number of surplus places in this planning area and in Saltdean in particular.</i></p>

		<p><i>The 8th Column ‘Surplus places or shortfall of places based on 2019’ data shows the number of surplus places we expect to see over the next 4 school years. It is considered good practice by the Department for Education (DfE) to maintain between 5% and 10% surplus places to allow for in year moves and parental preference. As you can see in the table below over the next 4 years we are forecasting that there will be between 48 and 127 surplus places in this planning area which is between 17% and 47%.</i></p> <p><i>In the event that the proposed development at Coombe Farm goes ahead our expectation is that it would generate approximately 17 primary age pupils once complete. This is across the entire primary phase (7 years), consequently even if the development proceeds we do not anticipate there being any pressure on school places in this part of the city in the foreseeable future since 17 pupils across 7 year groups equates to no more than 2 pupils per year group”.</i></p>
12	Is the suggested contribution of £213,546 for education to come from the CIL referenced in section 11?	Going forward, bids for education funding will be made to the CIL Strategic Pot in accordance with identified needs for additional places or major maintenance requirements. The £213,546 represents the tariff figure that would have been payable had the planning permission been granted prior to 5th October 2020 and is therefore no longer relevant.
13	Can we add a condition about BHCC re-evaluating bus routes to this development?	<p>Undertaking a study of the demand and bus routes to this site is not a legitimate planning condition and is not necessary to make this proposal acceptable in planning terms.</p> <p>Transport Officers consider that the existing bus services in the vicinity of the site provide a reasonable level of service, subject to improvements to pedestrian access to nearby stops. Whilst it may be possible to use CIL receipts to secure further route enhancements (e.g. works to address sources of delay on the network) this would be subject to a separate latter decision.</p>
14	Can you please tell me if the access road is the same width as the previous application?	Both the approved and proposed access road measure 5.5m in width. However, the layout within this width differs. That proposed in the current application for the carriageway includes a section of effective ‘shuttle’ working (i.e. only wide enough for one vehicle) in order to achieve continuous footway access into the site. The

		footway now extends for a greater distance along the southern side of the road before pedestrians are required to cross to the north side, which will benefit existing properties. From the junction with the road leading to the Kennels onwards, the alignment and layout differs.
Item B: BH2020/01742 The Meeting House, Park Close		
1	Can the T2 Ash tree at the rear be saved?	Please see plan below showing Tree T2 in very close proximity to the proposed development:



		<p>The submitted Arboriculture Report states the following:</p> <p><i>“Rooting area conflicts with the new rear courtyard area and building foundations. Based on the likely loss of roots associated with excavations required for the building foundations and the site’s topography making use of an above ground hard surface difficult, T2 is not considered feasible to retain. A new specimen tree should be planted in a similar location to mitigate the loss of the T2.”</i></p> <p>The Council’s Arboriculture Officer has confirmed the following:</p> <p><i>“T2 is certainly plotted in close proximity to the proposed structure. It would be unlikely to survive post development due to root removal, canopy overhang and soil compaction. It looks near impossible to maintain an exclusion zone; they would certainly need to redesign foundations and surface levels.</i></p> <p><i>Realistically with Ash dieback becoming prevalent, the tree is likely to require removal within the next 5 years on safety grounds, irrespective of development. I wouldn’t consider specifying retention as reasonable, and significant mitigative planting is the better option.”</i></p>
<p>Item G: BH2020/01986 22 Crescent Road</p>		
1	Is there only one small bathroom and toilet?	Yes there is one bathroom on the first floor
2	What “other student housing is being developed in the area”?	Other student housing includes the Vogue studios approved under BH2016/00935 (48 units) and 54 Hollingdean Road approved under BH2014/01637 (205 units)

Item I:
BH2020/01505
11 - 12 Rock Place, Brighton

1 Transport Comments
Is this built up to the boundary and no
footpath?

The building façade and pedestrian entrances present directly to the adopted highway boundary. The highway currently does not include any footway and continuous parking is permitted directly along the site frontage.

In view of this the applicant has proposed highway works outside the application 'red line' boundary to -

- create a bollard protected footway directly in front of the site;
- provide level access to the main entrance (which will otherwise be stepped) this is currently not acceptable to the Highway Authority; and
- introduce waiting restrictions (double yellow lines) for the length of the protected footway, to prevent vehicles from waiting alongside it. This would block the narrow carriageway.

Whilst the Highway Authority considers such safety, access and parking improvements to be necessary for the development to be acceptable, they are currently unable to accept the changes as proposed and have advised that they would not permit them. They also remain uncertain about whether any alternative scheme will be feasible given the significant constraints. Notwithstanding, they are currently recommending refusal on this matter as Planning Officers have not sought to secure an alternative scheme of highway works by either condition or obligation (and even the currently proposed works are not secured as they are outside the application boundary). Since they cannot entirely rule out the possibility that some alternative scheme will be feasible, they have recommended that this could be addressed via a Grampian (pre-commencement) condition. They consider the pre-commencement element to be essential given (in their view) both the importance of the improvements to the acceptability of the proposed development, and the uncertainty about whether this will be feasible. On the latter

		<p>point, they also note that they unable to prejudge the outcome of any decision to introduce waiting restrictions. This is subject to a separate statutory process that allows for objections, wherein the proposed TRO is referred to ETS committee to determine the outcome. Committee do not always support changes, even where these have been deemed necessary for planning purposes.</p>
2	<p>Can you explain the overspill of 18 cars?</p>	<p>This relates to the employment uses. Parking impacts from the residential components can be largely mitigated through recommended car free conditions, but these will not be effective for the employment use.</p> <p>The figure is per the submitted Transport Statement and has been produced by the applicant using survey data from the national TRICS® database for similar sites. From this an estimate of vehicle accumulation has been produced (the rolling difference between arrivals and departures). All of this will occur as overspill since no parking is proposed on site. Whilst it is likely that the existing uses of the site generated some parking demand already, this has not been assessed by the applicant, so cannot be taken into consideration as an offsetting factor. Some further parking demand above the 18 is likely to occur due to proposals to introduce waiting restrictions (double yellow lines) along the frontage to secure pedestrian access (see 1 above).</p> <p>Currently no parking survey has been provided for nearby streets and public car parks to show if there is enough spare capacity to safely accommodate this overspill without unacceptable safety and amenity impacts. Planning Officers propose that this can be addressed by securing a Travel Plan that has been submitted by the applicant (N.B. the amount of movement generated by the development would not normally otherwise merit a Travel Plan). Transport Officers have advised that this Travel Plan is not currently fit for purpose and appears to have been misunderstood. Whilst it might be possible to secure an alternative more appropriate Travel Plan via condition they have raised concerns that this may not meet planning tests since – until parking surveys are provided to show if there is a lack of spare capacity – it is not clear if any mitigation is ‘necessary’ and/or what a reasonable target for the Plan should be. They are therefore currently</p>

		advising that it would not appear possible to determine the application (other than for refusal) because of a lack of sufficient information from which to determine the likely impacts of the proposals.
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