Expiry Date – 2/12, paa agreed to 11/6

Development Control – Delegated Officer Report

Application Number: AWDM/1541/20 Recommendation – Grant

Site: 104/106 Brighton Road, Lancing

Proposal: **Demolition of two existing properties of converted self-contained flats. Erection of 4 storey terrace of five dwellings (3no. 4 bedroom and 2 no. 3 bedroom) with balconies, roof terraces and integral garages**

Neighbours checked: Y

Additional neighbour notifications: N

Date of Site Visit: 17/11 and 14/2

Site and Surroundings

This application relates to a pair of 3 No. two and a half storey timber framed houses on the south side of Brighton Road with single storey side and rear extensions, rear balconies and side dormers. Both properties are converted into 3 flats each. Each property has a dropped kerb and parking on its east side.

The properties back onto the shingled area Widewater which is a saline lagoon, a secondary sea defence embankment and designated Site of Nature Conservation Importance, very popular with bird watchers. The site is on sloping land such that the houses are two storey at the rear and three floors at the front with the second floor built into the gabled roofs. The rear gardens are on terraced levels down to the water's edge.

The existing properties are either painted and rendered or pebble dashed properties with stepped access up to the raised ground floor level and down into the rear gardens. To the east and west are houses of the same design with the one to the west (102) separated from the site by its own car parking area. No. 102 is occupied as 2 flats and No. 108 as three or possibly 4 flats. Further to the west is Eastern Sands caravan park.

The site is not in a conservation area and the houses are not listed. This area is predominately inter war suburban housing but has seen significant amounts of more modern and intensive infill on the south side of 3 storeys, most recently at No. 170.

The site and coastal strip sit in Environment Agency flood zone 3. There are traffic lights and a pedestrian crossing outside No. 104 and 1.5/2 parking bays outside No. 106. The A259 is a busy and wide coastal road well served by buses and is DEFRA identified as an area severely affected by traffic noise.

Proposal

It is proposed to demolish the existing houses and replace them with a terrace of 5 dwellings each over 4 floors with the central 3 houses having 4 bedrooms and the end two having three bedrooms. The houses would have rear balconies with the outside two houses each having a small roof terrace also.

At lower ground floor each house would have tandem parking for two cars and a third space each accessed off a continuous drop kerb for 4 of the houses and a separate drop kerb for the most westerly house. This floor would also include a shower room and home cinema or gym room with rooflight only. The access and parking arrangements have been revised since first submitted following County Highways advice.

This is a flat roofed development with a recessed 'pavilion style' top floor. The height to 3 floors is 8.3 metres, which is lower than the ridge height of both adjoining properties and comparable in height to the eaves of 110. The maximum height is 10.4 metres with the upper most floor set back from the front parapet by 5.4 metres and set in from each side by 3 metres.

Proposed materials are a light yellow brick to the walls with some brick patterning (recessed and protruding bricks) on the upper ground floors and timber cladding on the top floor. Slimline aluminium windows and doors are proposed.

Relevant Planning History

No. 106

L/126/96 - Application for Certificate of Lawfulness for existing use of house as 3 self-contained flats. Issued

No. 104

ADC/0499/10 - Replacement of all windows in ground floor flat with UPVC double-glazed windows (Flat 1). Granted

L/24/03 - Enlargement of east side dormer (Flat 3). Granted

L/135/00 - Rear extension south side with balcony above. Granted

Consultations

Highways: '*Due to site constraints there is nothing more that can be done to alter/improve access from the highway for plot 2. Whilst access to plot 2 is not ideal it would not interfere with the standing space of pedestrians waiting at the crossing. We also wouldn't want to see residents of plot 2 bumping up and down a kerb to access their drive/garage; therefore the LHA accept that the layout as proposed on Drawing no: L-200 D is the best that can be achieved. We would have no objection to the application in line with paragraph 109 of the NPPF.*

The resubmitted RSA Audit Log Report is now in the correct format and has been signed off. '

Earlier:

'I've now had a chance to review the revised plans and Road Safety Audit (RSA).

Revised Plans
The revised parking arrangements seem more workable and are similar to other existing arrangements on this section of the A259. However, the access for plot 2 in the vicinity of the pedestrian crossing raises concern. The other plots could use the associated carriageway outside their plots to manoeuvre into their plots without entering the opposite side of the carriageway. But plot two has a particularly difficult layout to negotiate, to reverse into the site and exit to the west, which may involve a manoeuvre taking place by entering the opposite side of the carriageway. Given that this is a busy A road we would raise concern with this. By cutting the footway back here this manoeuvre would also be very close to the existing crossing equipment which could be damaged in the process, as well as introducing a reversing/vehicle movement much closer to possible pedestrians waiting to cross by the removal of part of this build out. I'm surprised this was not highlighted when the revised plan was reviewed by the RSA team. We would need to see some tracking diagrams of these manoeuvres, to see the amount of road space it would affect. It would also be advisable to run this point past the RSA team for comment. Ideally the LHA don't wish to see this pedestrian crossing build out removed/reduced in this location.

RSA
With regards to the RSA this states it's a Stage 2 RSA, I'm assuming this is a typo as planning applications are accompanied by stage 1 RSA's. This will need amending to read Stage 1. As this is a Legal document on the planning file and our records for road safety purposes.

Road Safety Audit Response Report (RSARR)
In terms of the Designers Response to the RSA this is in the old format, as stated in the letter dated 12th February from EC Road Safety we would need a RSARR submitted in the format as detailed under GG119 appendix F.'

Highways England: *No objection.*

Environment Agency: ***'****We request that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority.*

Condition
The development shall be carried out in accordance with the submitted Flood Risk Assessment (FRA) (submitted by A.C. Rollings, dated 21/09/2020) and the following mitigation measures it details:
No habitable accommodation shall be placed on the ground floor; and
Resilient and resistant measures (specified in section 8.1 of the submitted FRA) shall be implemented. These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's

timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.
Reasons
To reduce the risk of flooding to the proposed development and future occupants.

The condition is in line with the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change.

Please notify us immediately if you are unable to apply our suggested condition, to allow further consideration and advice.

Advice to the Local Planning Authority
Flood warning and emergency response
We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.
The Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise Local Planning Authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to available guidance 'Flood risk emergency plans for new development' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 163 of the NPPF and the guiding principles of the PPG.'

Technical Services:

Thank you for the opportunity to comment upon this application. We have the following comments on flood risk and surface water drainage.

Flood risk- The application is within flood zone 3, the site is shown to not be at risk from surface water flooding. The Environment Agency should be consulted.

Surface water drainage- the application states that surface water will be disposed of via mains sewer. This is not acceptable, there are no surface water sewers in this location. If you are minded to approve this application please apply the following conditions to ensure the development is adequately drained and does not increase flood risk elsewhere:

"Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to

and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter infiltration testing to BRE DG365, or similar approved, will be required to support the design of any infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity."

And

"Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual."

along with the accompanying informative:

"Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period andat the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE DG365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Further detail regarding our requirements are available on the following webpage https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms. A surface water drainage checklist is available on this webpage. This clearly sets out our requirements for avoiding pre-commencement conditions, or to discharge conditions."

Subsequent comments:

'I have confirmed that he can do testing at risk in the summer months, if this testing shows infiltration isn't going to work then they will be able to form an attenuation design. However, if results indicate that infiltration may be possible they will have to wait and do more testing in the winter as per our usual requirements. He is happy with this way forward as it gives them a chance of starting sooner. And I am happy as it will ensure that the hierarchy is appropriately followed. Often on sites where we are unsure of infiltration potential and where applicants aren't happy with waiting we suggest this as

an alternative, some applicants take it up, and probably about half of the time they still have to go back in the winter.

I've given him advice about monitoring and testing that must be followed to ensure the results obtained in the summer are appropriate. I.e. they don't just do an infiltration test really deep and claim it doesn't work. I have recommended that he contacts me once groundwater monitoring has been completed, including a reading over high springs, to agree infiltration testing depth.

So yes, please apply the two conditions I originally requested and the informative.'

Southern Water: '*Please see the attached extract from Southern Water records showing the approximate position of our existing sewer within the development site. The exact position of the public assets must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised.*

- The 150 mm diameter foul sewer requires a clearance of 3 metres on either side of the gravity sewer to protect it from construction works and to allow for future maintenance access.
- No development or tree planting should be carried out within 3 metres of the external edge of the public gravity sewer without consent from Southern Water.
- No new soakaways, swales, ponds, watercourses or any other surface water retaining or conveying features should be located within 5 metres of a public gravity sewer.
- All existing infrastructure should be protected during the course of construction works.

Please refer to: southernwater.co.uk/media/default/PDFs/stand-off-distances.pdf

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains and any such proposed assets in the vicinity of existing planting. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers" (southernwater.co.uk/media/1642/ds-tree-planting-guide.pdf) and the Sewerage Sector Guidance (water.org.uk/sewerage-sector-guidance-approved-documents/) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

In order to protect public sewers, Southern Water requests that if consent is granted, the following condition is attached to the planning permission;

The developer must agree with Southern Water, prior to commencement of the development, the measures to be taken to protect the public sewers.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Southern Water requires a formal application for any new connection to the public foul sewer to be made by the applicant or developer.

To make an application visit: developerservices.southernwater.co.uk and please read our New Connections Services Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

Our initial investigations indicate that there are no public surface water sewers in the area to serve this development. Alternative means of draining surface water from this development are required. This should not involve disposal to a public foul sewer.
The design of the proposed basements and on-site drainage system should consider the possibility of surcharging within the public sewerage system in order to provide adequate protection to basements from the risk of flooding.
For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).
Website: southernwater.co.uk by email at:
SouthernWaterPlanning@southernwater.co.uk'

Lancing Parish Council:

'Whilst Members agreed to the recommendation of no objection, concerns were raised in regard to the limited number of parking spaces.

Please note, if the application is approved, the Committee requests that Adur District Council applies a condition to highlight the fact that the property is adjacent to a Local Nature Reserve and, as such, any building works should avoid dumping waste materials/liquids into the lagoon that would result in the lagoon being polluted, in accordance with the provisions of The Environmental Protection Act 1990 Sections 34, 35 and 59, 'fly tipping' (illegally dumping).'

Environmental Health: *'I am happy for this one to be approved with a condition specifying the glazing required to mitigate noise contained within the report and the requirement for a MVHR system to be installed in each unit to provide ventilation. '*

And a further condition:

A Demolition and Construction Management Plan condition, to include hours of demolition/construction and deliveries, traffic management, dust control, material and waste handling, management of the Highway etc...

Representations

One objection received from No. 267, opposite site.

'Unacceptable loss of sea view.'

Relevant Planning Policies and Guidance

Adur Local Plan 2017 Policies 1, 2, 3, 9, 15, 18, 19, 20, 31, 34, 35 and 36 including 'Development Management Standard No. 1 Space Around Dwellings'.
WSCC Guidance on Parking at New Developments (Sept 2020).
Environmental Protection Act 1990
National Planning Policy Framework (February 2019)
Technical Housing Standards – nationally described space standard (DCLG 2015)
SPD Sustainable Energy August 2019

Planning Assessment

Principle

The principle of development can be supported as it proposes development on a brownfield site within the built up area boundary. For consideration is the impact of the proposals on the character and appearance of the area, the design and the impacts of the development on neighbour amenity, future occupiers living conditions, the highway network, flood risk, drainage and energy

Housing Supply

In February 2021 the Government published the Housing Delivery Test 2020 measurement results. Adur delivered 48% of its requirement, and therefore the presumption in favour of sustainable development applies.

However, the Local Plan trajectory demonstrates that, when measured against the Local Plan delivery target, this shortfall can be addressed later in the plan period. Commitments are predicted to increase significantly in 2023/24.

Design and Character

There has been a lot of redevelopment of houses along this stretch of road over the last 20 years with typically 2.5 storey detached houses replaced with a pair of three storey houses. The design of these replacement dwellings has varied considerably with flat roofed, pitched roof and higher central gables all featuring. The palette of materials used has also varied considerably. What they do all have in common is that they are three storey from the front and two storeys at the rear and have rear balconies. There are however examples of properties that are two storeys at the rear but which include large roof extensions that in effect give them the appearance of three floors from the rear (south).

This proposal is for a terrace of five houses with flat roofs and untypically includes a pavilion style 4th storey. At the front the height to 3 floors is 8.3 metres, which is lower than the ridge height of both adjoining properties and comparable in height to the eaves of No. 110. The maximum height is 10.4 metres with the upper most floor set back from the front parapet by 5.4 metres and set in from each side by 3 metres. The drawings indicate that the maximum height will exceed the maximum height of No. 110 by

650mm. A recent approval at No.152 had a ridge height of 10.3 metres (excluding the taller central gable feature) and an eaves height of 7.85 metres, (AWDM/0528/16 refers). It is believed that these are currently the tallest 3 storey houses in the street. At No. 170, currently nearing completion, three storey houses were approved with an eaves line at 8.897m with a shallow central gable with a maximum height of 9.6m, (AWDM/0330/18 refers).

The height to three stories is not dissimilar to other approvals in the street. The height of the pavilion floor is also comparable to the highest approval in the street but in this case it is less obtrusive as it is recessed from the front and sides in the pavilion style. At the rear the upper floor is recessed by 1100mm and the two end roof terraces by 1800mm. This is a bold feature but this storey remains subordinate to the other floors and on that basis it is considered that the scale of development will not be harmful to the appearance of the streetscene or to the Local Nature Reserve of Widewater.

It is also considered that the overall design with undercroft parking and projecting front bay window details is acceptable and reminiscent of other infill projects nearby.

Neighbour amenity

The proposal has a similar front and rear building line to both neighbouring properties. It is built up against the west boundary with No.102. This neighbour has a car parking area approximately 6 metres in width adjoining the common boundary. The development is shown as set off the eastern boundary with No. 108 by 2.3 metres and a side passage and stair to the rear garden proposed. No. 108 is shown as set off the same boundary by 500mm. This is greater than the separation between the newer house at 110A and the ground floor side extension at No. 112. No.108 has its greater boundary clearance and car parking area on its east side.

It is considered that this degree of separation is acceptable and will not lead to significant harm.

No side windows are proposed in the end dwellings. Upper floor balconies are recessed at first and second floor levels. Both end units have small roof terraces set off the outside edges by 3 metres and from the rear wall by 1.8 metres. These are shown to be screened from the side by timber ‘brise soleil’ screens to avoid direct overlooking of the properties either side. Further details of these screens are reserved by condition.

A neighbour opposite has objected to the development on the grounds that he will lose his view of the sea. The planning process cannot protect a view and at more than 25 metres separation outlook will not be significantly obstructed.

No access is shown to the front flat roofed area and this is also precluded in the future by condition.

Future occupiers Living conditions

The proposed 3 bedroom dwellings would each have an internal floor area of approximately 159 square metres and the 4 beds 179 square metres which easily exceed the minimum floor areas for such houses stipulated in the Technical Housing

Standards. The proposed dwellings would each be provided with a rear garden sloping down in terraces to the edge of Widewater Lagoon, having an overall depth of 11 metres and an area of approximately 60 square metres, one larger at 80 square metres. This falls slightly short of the minimum garden area of 65 square metres required for a 3 bed terraced dwelling in the Council's Development Control Standard No.1 but is adequate in the circumstances, bearing in mind the quality of the space and the additional rear balconies and roof terraces (there is no specified standard for 4 bed terraced houses). However PD rights should be withdrawn to prevent further unacceptable erosion of amenity space.

Bedrooms in the properties would be exposed to traffic noise from the busy Brighton Road. The Environmental Health Officer is satisfied with the acoustic report submitted and the proposed glazing and MVHR ventilation system it contains. The proposal is recommended in accordance with this report.

In general it is considered the proposed dwellings are well laid out and would provide a good standard of family accommodation.

Highways

The site is reasonably accessible with a number of bus routes operating along the Brighton Road and within walking distance of Lancing and Shoreham town centres and nearer local shops.

The access and parking arrangements have altered since first submitted and no longer include a service road running parallel to Brighton Road with parallel parking in front of the houses. Highways had objected to this arrangement.

The revised proposal includes a continuous crossover for houses 1 to 4 with the most westerly house having its own separate access. These two crossovers leave unaltered the existing pedestrian pelican crossing outside the site but do cross zig zag road markings. Currently the existing properties and those opposite have access points crossing zig zags. On street parking for two small cars would also be lost.

The Highway Authority has confirmed that they are content with the new access and parking arrangements though they acknowledge the access to house 2 is not ideal. The new arrangement increases parking to each house to 3 cars with cycle parking shown in the undercroft space. EV charging points are also shown for each house. The loss of on-street parking is regrettable but is otherwise available nearby.

Flooding/Drainage

The Environment Agency is satisfied with the submitted Flood Risk Assessment and the application is conditioned to be in accordance with it.

Otherwise the site is in flood zone 3 and not at risk from surface water flooding. Draining surface water to the sewers will not be acceptable and so the application is recommended subject to a conditions that we see full details of surface water drainage and a maintenance programme before any works commence.

The ecology of Widewater does not appear to be under threat from this development if built responsibly. An informative is suggested reminding the applicant of his responsibilities under The Environmental Protection Act 1990 Sections 34, 35 and 59.

Energy

The adopted Sustainable Energy SPD (Aug 2019) provides guidance to developers of all major applications, all new development in the Shoreham Harbour Regeneration Area and all new developments in the proposed Shoreham Heat Network on how to comply with the sustainable energy policies of the Local Plan. This is to be done through the submission of an Energy Statement for which a template is provided. On all other developments energy statements are encouraged.

This proposal is not a major application and is not in the Shoreham area. The applicant has provided an energy statement for his proposal as follows:

'Please see below a list of sustainable measures which will be factored into the construction of the project.

- Use of local materials and suppliers

- Use of materials with a lower embodied energy

- Increased levels of insulation to wall, floors and roofs

- Utilise the southern aspect to provide passive heating

- Incorporate natural light to reduce the need to artificial lighting

- Use construction methods that provide thermal mass heavy weight materials, these can absorb the natural sun during the day and release it into the houses when the temperature drops

- Minimizing resource wastage by use of prefabricated elements in the construction process

- Air tightness – introducing airtight membrane and tape to prevent air leakage. This will reduce heat losses and reduce the need to heat the internal spaces, his will reduce heat losses and reduce the need to heat the internal spaces

- Incorporate low energy (LED) lighting the whole project, including sensor lighting

- Incorporate a MVHR system to the development, his will reduce heat losses and reduce the need to heat the internal spaces

- Incorporate triple glazed units to both windows and doors

- Explore the use of Air source heat pump for heating and hot water to reduce the use gas natural gas

- Explore the use to photovoltaic panel to supplement the electrical demand -

Incorporate A++ appliances to each of the houses.

- Provide water butt for each of the houses

- Provide car charging point in each of the garages

- Incorporate low water usage appliances, i.e., low flush toilets, reduced flow taps.'

The proposal does not include the use of an air source heat pump and nor does it currently propose photovoltaic panels, though these could be added without planning permission at a later stage. Otherwise the energy statement is considered acceptable.

Recommendation APPROVE subject to the following conditions:

1. *Approved Plans*
2. *3 years*
3. *In accordance with FRA*
4. *Pre-commencement Surface water*
5. *Pre-commencement Surface water*
6. *Pre-commencement – measures to protect public sewer*
7. *Constructed in accordance with Acoustic report*
8. *Pre-commencement - Construction management plan*
9. *Parking/Access/EV's constructed prior to first occupation*
10. *Pre-commencement - Materials*
11. *Pre-commencement - Landscaping*
12. *Pre-commencement – Fencing*
13. *Brise soleil details prior to occupation*
14. *PD restricted*
15. *No side windows*
16. *Hours of construction*
17. *No extension of terrace or use of front flat roof as terrace*

Informative

1. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received and subsequently determining to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.
2. This site is adjacent to a Local Nature Reserve and, as such, any building works should avoid dumping waste materials/liquids into the lagoon that would result in the lagoon being polluted, in accordance with the provisions of The Environmental Protection Act 1990 Sections 34, 35 and 59, 'fly tipping' (illegally dumping).
3. Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE DG365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include

adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Further detail regarding our requirements are available on the following webpage https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms. A surface water drainage checklist is available on this webpage. This clearly sets out our requirements for avoiding pre-commencement conditions, or to discharge conditions.

4. SW sewer License
5. Highway License
6. Herring gulls are nesting on the roof of No.104 currently. Demolition should not take place in the breeding season.

Is recommendation contrary to any representations? Yes

Case Officer signed: MOK Date: 9.6.21

Authorised and signed by: Peter Barnett Date: 9 June 2021