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The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

By email: east2@planninginspectorate.gov.uk

22nd August 2025

Dear Sir/Madam

Appeal by Sound Investments Ltd (APP/Y3805/W/25/3368011)
Site Address: Europa House, 46-50 Southwick Square, Southwick, West Sussex, BN42 4FJ

We write on behalf of the appellants in relation to the above appeal and to respond to the planning conditions suggested by the Local Planning Authority and comments from third parties. The appellant's main case is fully set out in our Appeal Statement dated June 2025.

## LPA Suggested Conditions

Adur District Council has suggested four potential planning conditions in the event of the appeal being allowed. These relate to the 3-year commencement date, application plans, landscaping details and a Construction Management Plan. The appellant does not object to these conditions, however, for the avoidance of doubt, the application drawings should be listed as part of Condition 2:

- Location Plan & Block Plan - TA/1568/01
- Existing Site Plan - 03
- Existing Elevation - 04
- Existing Section - 05
- Proposed Ground Floor Plan - TA/1568/10
- Proposed Elevation - TA/1568/11
- Proposed Section - TA/1568/12

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## 3rd Party Comments

The majority of concerns raised by 3rd Parties have already been addressed in our Appeal Statement. However, we trust the following response will help to clarify the appellant's case.

The appellant is unable to create parking spaces at the rear of the building as suggested. There is no space to do so because the land to the rear of Europa House is a public highway that enables service vehicles to access the shops and flats above. The road also provides turning space for refuse lorries and emergency vehicles.

It is not possible to install electric vehicle charging infrastructure to the appellant's existing parking spaces due to the prohibitive costs and the multitude of landowners required to agree contractual rights over the land to install an electrical supply to that area. Moreover, this option would not deliver the additional parking spaces needed to improve the commercial offering to current and prospective occupants of the building.

The appellant does not have rights to use the Cricketers public house car park as suggested. The electric vehicle charging points recently installed in this car park are for pub customers only.

Double yellow lines have been extended in front of Europa House since this appeal was submitted in June 2025. These additional highway restrictions have reduced the number of on-street parking spaces available to all users of Southwick Square and increases the need for parking provision associated with Europa House.

The proposed parking spaces would be located on privately owned land which is not subject to any public rights of way over it. Additionally, there will be no change in the width of the public pavement adjacent to the site. The County Highways Authority has confirmed that there will be no issues with visibility for drivers accessing or exiting the proposed parking area. The adjacent

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house (34 The Green) has a dropped curb to facilitate parking to the font of this property and at no time has this resulted in any highway safety incidents.

On the above basis, we request that the appeal is allowed and planning permission is granted accordingly.

Yours faithfully

Paul Burgess MRTPI
paul@lewisplanning.co.uk

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