

Committee: **Regulatory
Planning Committee**

Date: **13 January 2016**

Report by: **Director of Communities Economy and Transport**

Proposal: **Continued use of site as a waste transfer station
involving demolition and replacement of existing
building and ancillary works**

Site Address: **James Waste Ltd, Unit 3, Cradle Hill Industrial Estate,
Seaford, BN25 3JE.**

Applicant: **Mr Martin James, James Waste Management LLP**

Application No. **LW/754/CM**

Key Issues: **(i) Purpose of development
(ii) Effect on amenity
(iii) Effect on Seaford Town Cemetery
(iv) Traffic impact**

Contact Officer: **Jeremy Patterson – Tel: 01273 481626**

Local Member: **Councillor Carolyn Lambert**

SUMMARY OF RECOMMENDATIONS

1. The Committee is recommended to refuse planning permission for the reasons set out at Paragraph 8.1 of this report.

CONSIDERATION BY DIRECTOR OF COMMUNITIES ECONOMY AND TRANSPORT

1. The Site and Surroundings

1.1 The application site is located in the southern part of the Cradle Hill Industrial Estate, an established industrial area on the north-eastern outskirts of Seaford and within the development boundary. The boundary of the South Downs National Park (SDNP) is about 220 metres to the north and east of the site. The application site itself includes an existing waste transfer station (WTS), which operates from an industrial unit (Unit 3) with associated vehicular parking and access space.

1.2 The WTS building is accessed from the north-eastern part of the premises and there is an access driveway and vehicle waiting area adjoining the north side of the building. There is a car parking area in front (to the west)

of the building and pedestrians can access the building from this side. A further area of hardstanding lies to the south of the building, which is not permitted to be used as part of the WTS, except for allowing additional access for pedestrians.

1.3 Further industrial units are located to the north and north-east of the application site and across the relatively narrow Estate road to the west and north-west. The adjacent Unit 4 is to the north of the application site and is occupied by an electrical company. Unit 2 to the south-west of the application site is occupied by a Funeral Directors, which includes a chapel of rest, and a Fire Station is located further to the south-west. Seaford Town Cemetery is situated to the south and east and residential properties are to the south-east and south-west. The closest residential property is 17 Kammond Avenue, which is about 30 metres east of the application site, although the distance from the western corner of its garden to the site is about 8 metres.

2. The Proposal

2.1 The applicant proposes to demolish the existing building and replace it with a new building, which it considers would facilitate easier and safer access, maximise internal space for more effective working and create a safer working environment. The new building would be steel framed and would cover most of the site. Its height would be 12.2 metres at the pitch of the roof with the height of the eaves at about 9.4 metres. This compares to the highest part of the existing (rear) building being about 7.5 metres, with the front part of the building being just over 6 metres high. The proposed internal layout of the building would involve the installation of storage bays at the northern side, with the sorting area in the central and eastern areas. A weighbridge would be installed at surface level just inside the vehicular access at the western side, the latter controlled via a roller shutter door. Access to the yard on the south side of the building would also be available via a separate roller shutter door. A new office and kitchen would be constructed at the southern side and pedestrian access would be via an open yard at the south-western side of the building. A mezzanine floor would be installed above the new office and kitchen to accommodate a staff room and office. The total floor area of the new building would be 1,316 square metres compared to 900 square metres of the existing building, amounting to a 46% increase. A new retaining wall would be constructed to the south of the building to accommodate differing land levels and some tree planting is proposed on the southern part of the site.

2.2 Overall, the WTS operation would retain the current management of waste primarily from the applicant's skip hire operation, although some materials would continue to arrive from external sources, such as building contractors or local waste removal companies. Waste materials are delivered to the site, typically by skip trucks, Roll-on Roll-off trucks and tipper trucks. Each incoming delivery vehicle would be weighed and all accepted loads would be stockpiled in the sorting area. A telehandler and digger would sort the waste, which would then be stored in bays. Up to 75,000 tonnes of waste per annum (tpa) is proposed to be managed at the site, compared to the

existing 20,000tpa. Parking would be retained at the front of the WTS for staff, while lorries would park in the building, presumably overnight only. The proposed hours of operation would be the same as the existing hours, between 0730 – 1700 Mondays to Fridays and 0800 – 1300 on Saturdays. The number of employees is proposed to increase from 13 to 20. The applicant anticipates that an average of 36 waste related movements per day would occur.

3. Site History

3.1 Planning permission was granted in 2009 (ref. LW/581/CM) for a change of use from a disused storage unit to a WTS. Later in the same year, permission was granted (ref. LW/602/CM) for a variation to Condition 4 of permission LW/581/CM to allow the storage of empty skips outside the building on its northern side. In 2011, permission was also granted (ref. LW/652/CM) for a change of use of an adjoining building to the WTS, which forms part of Unit 3, from a disused storage area to an extension of the existing WTS.

3.2 In 2012, an application was withdrawn (ref. LW/696/CM) for the variation of Conditions 5 and 8 of permission LW/652/CM to allow storage of empty skips in the yard to the south of the building, together with alterations to the main site entrance and the construction of metal fencing and gates at the front of the site (retrospective) and also the proposed use of a telehandler inside the building to help with the loading and unloading of waste.

3.3 Planning permission was granted in 2013 (ref. LW/711/CM) for alterations to the main entrance and the construction of metal fencing and gates at the front of the site (retrospective) and the use of a telehandler inside the building to help with the loading and unloading of waste.

4. Consultations and Representations

4.1 Lewes District Council, as local planning authority, raises no objections, although recommends that any permission should include conditions to mitigate the visual impact of the development on the setting of the adjoining Cemetery and Chapel, which are considered to be non-designated heritage assets. The conditions should include a scheme for planting along the southern boundary and details of the external finishes of the building, including the colour, which should be of a recessive nature.

The District Council's Conservation Officer raises concerns over the height, scale and proximity of the new building and the negative impact it would have on the setting of the Seaford Cemetery, which is a non-designated heritage asset.

4.2 Seaford Town Council raises no objections.

4.3 Highway Authority does not object, although raises concerns that the development could lead to an increase in on street parking within the

industrial estate. A condition is recommended to provide for a parking area, the details of which should be submitted and approved by the County Planning Authority.

4.4 Environment Agency raises no objections.

4.5 ESCC Flood Risk Management does not object, although recommends that conditions should be included on any permission requiring the submission of detailed hydraulic calculations to be provided to support surface water management proposals and that a maintenance and management plan for the entire drainage system should be submitted and agreed before any construction takes place.

4.6 Representations: Four representations have been received objecting to the proposed development, which can be summarised as follows:

The occupier of the nearest residential property (17 Kammond Avenue) and her daughter (from a separate address) object to the proposal on the grounds that: (i) The size of the new building would be inappropriate for this area as it is much larger than other buildings on the Industrial Estate. The garden of 17 Kammond Avenue is only separated from the application site by the narrow Cemetery road. The new building would visually dominate the residential area; (ii) The proposed mitigation is inadequate; & (iii) The increase in noise levels and pollution generated from both the activities on site and the movement of traffic will adversely affect the use of the garden.

The business at the adjoining Unit 2, which is occupied by Dignity Funerals Ltd, objects on the following grounds: (i) There are already significant highway problems with the operation of the existing WTS and the proposed development will make it worse. There will be a significant reduction in the amount of hardstanding and parking opportunities as a result of the increased amount of development on the site. The parking arrangement is a significant material consideration and should be determined through the planning application, not at a later stage. More employees will need more parking spaces. Not enough information has been submitted on the proposed numbers of vehicle movements in relation to the new development and to existing movements. A Transport Statement should have been submitted; (ii) The existing development causes significant levels of disturbance due to noise, dust and odour. No noise assessment has been submitted and no information has been provided on how much noise would be generated or how it could be mitigated. There are existing problems with dust at the site, which will continue with the new development resulting from vehicle movements and emissions from loads. The adverse effects of congestion and noise are shared by Dignity's clients; (iii) Impact on trees and hedgerows; & (iv) The new building will be clearly visible from the adjoining Cemetery and will detract from the area. The development will have a significant adverse impact on the Cemetery as a place to rest and mourn and is entirely unacceptable given the context of the surrounding area.

The business at the adjoining Unit 4, which is occupied by Brighton Electrical Assemblies Ltd, objects on the following grounds: (i) The size of the new building is not appropriate for this location, as it is much larger than other buildings; (ii) The road is not able to cope with the size and type of vehicles using the WTS. Sufficient parking would be required but this is not shown; (iii) The current noise levels are unacceptable and the increased vehicle movements and operational activities will only add to it; and (iv) Lorries from the existing WTS have to mount the pavement and the road is covered with mud and debris which affects drainage.

5. The Development Plan and other policies of relevance to this decision are:

5.1 East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013: WMP3b (Turning Waste into a Resource); WMP3d (Minimising & Managing Waste During Construction, Demolition & Excavation); WMP6 (Safeguarding Waste Sites); WMP7a (Sustainable Locations for Waste Development); WMP22 (Increased Operational Capacity within the Site Boundary of Existing Waste Facilities); WMP23a (Design Principles for Built Waste Facilities); WMP23b (Operation of Sites); WMP25 (General Amenity); WMP26 (Traffic Impacts); WMP27a (Environment & Environmental Enhancement).

5.2 Lewes District Local Plan 2003: Saved Policy ST3 (Design, Form & Setting of Development).

Lewes District Council undertook a review of its Saved Local Plan Policies (2007) to determine their consistency with the NPPF (2012) and produced a table indicating the extent to which the policies are fully consistent, partly consistent or not consistent. Saved Policy ST3 is considered to be fully consistent with the NPPF.

5.3 Lewes District Proposed Submission Joint Core Strategy 2013: Core Policy 11 (Built & Historic Environment and High Quality Design).

Lewes District Council Joint Core Strategy Local Plan examination hearings took place in January 2015. The Core Strategy is now in an advance stage following the publication of the proposed modifications, which the Inspector is currently reviewing and a hearing was held in mid-December 2015. The Core Strategy is a strategic level plan and is a material consideration in determining planning applications. Policy 11, regarding the Built Environment and High Quality Design, makes reference to safeguarding historic assets and is relevant in this case.

5.4 East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan Submission Draft 2015: Map 50 SP-WCA/AD, Unit 3, Cradle Hill Industrial Estate, Seaford.

5.5 East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan Schedule of Suitable Industrial Estates 2015: I/L Cradle Hill Industrial Estate, Cradle Hill Road, Seaford.

5.6 National Planning Policy Framework (NPPF) 2012

The NPPF does not change the status of the Development Plan as the starting point for decision making and constitutes guidance as a material consideration in determining planning applications. It does not contain specific waste policies but regard should be had to NPPF policies so far as relevant. Parts 7 (Requiring good design) and 12 (Conserving and enhancing the historic environment) are relevant in this case.

5.7 National Planning Policy for Waste (NPPW) 2014

The NPPW sets out detailed waste planning policies and regard should be had to them when planning authorities seek to discharge their responsibilities to the extent that they are appropriate to waste management.

6. Considerations

Purpose of development

6.1 The Waste and Minerals Plan supports, in principle, development that accords with the principles of the waste hierarchy (Policy WMP3b), is located in Areas of Focus (Policy WMP7a) and is located on sites within which the operational capacity can be increased (Policy WMP22). Proposals also need to demonstrate that waste is minimised during construction and demolition works (Policy WMP3d) and that a working programme accompanies the proposed operation (Policy WMP23b). The Waste and Minerals Plan also supports the retention of existing waste sites (Policy WMP6) and the Draft Sites Plan identifies the application site as a safeguarded site, which is also present within an industrial estate which is considered to be suitable for waste management facilities.

6.2 The application site is currently used as a WTS and is within an Area of Focus. As such, it is safeguarded in the Waste and Minerals Plan under Policy WMP6 and accords with Policy WMP7a. The site is also identified in the Draft Waste and Minerals Sites Plan for waste management purposes and Cradle Hill Industrial Estate is also identified in the Draft Waste and Minerals Sites Plan Schedule of Suitable Industrial Estates for waste uses.

6.3 The proposal is for the continued use of the site as a WTS, primarily centred on the applicant's skip hire business. It also involves the demolition of the existing building and the erection of a new building to accommodate the WTS use. Waste would be brought to the site and sorted into different waste streams before being bulked up and transferred to other facilities. The new building would provide for greater floor space and vertical handling space so that the management of waste could be undertaken more efficiently,

compared to the existing arrangement. As such, the proposal complies, in principle, with Policies WMP3b and WMP22 of the Waste and Minerals Plan.

6.4 The applicant has set out in outline how the WTS would operate, thereby according with Policy WMP23b, although has not demonstrated how waste resulting from the demolition of the existing building and construction of the new building would be managed and minimised in accordance with Policy WMP3d. However, in terms of the latter, this could be addressed by condition, if planning permission was granted.

6.5 Overall, the proposed development accords, in principle, with waste management policies in the Waste and Minerals Plan.

Effect on amenity

6.6 Policy WMP25 of the Waste and Minerals Plan requires, inter alia, that proposals should have no unacceptable effects on the standard of amenity appropriate to the established, permitted or allocated land uses of the local and host communities likely to be affected by the development; that there is no significant adverse impact on air quality or the local acoustic environment; and that there is adequate means of controlling noise, dust, litter and odours, including those arising from traffic generated by the development. Saved Policy ST3 of the Lewes District Local Plan requires, inter alia, development to respect the overall scale, height, massing, site coverage, character and layout of neighbouring buildings and the local area; that materials should be appropriate to the character of the local area; that development should respect the amenities of adjoining properties in terms of, inter alia, noise and visual amenities; that development should not result in detriment to the character or the amenities of the area through increased traffic levels; and that appropriate provision for access and parking should be provided.

6.7 Policy WMP23a of the Waste and Minerals Plan requires buildings associated with waste development to be, inter alia, of a scale, form and character appropriate to its location. In urban fringe locations, design should complement the existing scale and built form of the local area and take account of local landscape character and distinctiveness. Part 7 of the NPPF requires development to be of good design and planning decisions should ensure that developments respond to local character and distinctiveness and create a strong sense of place and add to the quality of an area.

6.8 The application is supported by a Landscape and Visual Assessment (LVIA), which considers the potential impacts of the proposal from the surrounding area both on views and to the landscape. The LVIA has concluded that (i) visual effects will only be experienced from receptors close to the development where the scale of building will never be completely mitigated; and (ii) effects to the landscape are very small and are unlikely to change over the life of the development.

6.9 Two local residents and two adjoining businesses have made representations which include objections relating to loss of amenity. The main

concerns refer to the size and dominance of the proposed building, noise and dust emissions and increased vehicle use. The proposal has the potential to increase the impact on the locality, as the new building would be 4.725 metres higher than the highest part of the existing building, the footprint of the new building would be substantially increased compared to the existing and the development would result in an overall increase in operational activity at the site.

6.10 Although the application site is located within the Cradle Hill Industrial Estate, it is situated at its southern end, which is on elevated land compared to land to the north and west of the Estate, as the land slopes down in those directions. The proposed building would be a substantial structure and would be much larger in relation to its height and bulk compared to other units on the Estate, exacerbated by its elevated location. Although it is proposed to partly mitigate the effect of the building by using a paler recessive colour, it is nevertheless considered that its overall size in this location would be inappropriate and would have a visually dominating effect over other units on the Estate. Land adjoining the Estate to the south and east would also be visually affected by the new building, specifically from the Cemetery and nearby residential properties. The development would result in an immediate change in the form and height of the building, which would break the skyline at a significantly higher level compared to the existing building, thereby producing a dominant structure, which would be out of place in this location. Persons in the Cemetery and from nearby residential premises would experience a much more imposing structure compared to the existing, which would have a negative visual effect from these areas where users are seeking tranquillity and peace. The overall visual effect of the new building for occupiers of nearby industrial units, users of the Cemetery and nearby residents, would be detrimental and would conflict with Policy WMP25 of the Waste and Minerals Plan and Saved Policy ST3 of the Lewes District Local Plan.

6.11 While an increase in activity at the site would be likely to result in an increase in noise and dust emissions, the proposed building might contain such emissions which are generated within the building. However, the effects of movements of heavy goods vehicles to and from the site will result in continuing noise and dust emissions. Although the applicant has stated that there would be no increase in vehicle movements compared to the existing situation, the increase in anticipated waste throughput from 20,000tpa to 75,000tpa casts some doubt over this. It is likely that the proposal would result in an increase in activity outside the building through vehicle movements and associated turning and waiting, which would result in a corresponding increase in noise and dust. This would be likely to affect the occupiers and users of adjoining units on the Industrial Estate, particularly the Funeral Directors, but it would also affect users of the wider Estate and the adjoining Cemetery and nearby residential properties. This would be likely to lead to a loss of amenity, thereby conflicting with Policy WMP25 of the Waste and Minerals Plan and Saved Policy ST3 of the Lewes District Local Plan.

Effect on Seaford Town Cemetery

6.12 As set out above, Policy WMP25 of the Waste and Minerals Plan requires, inter alia, that proposals should ensure there is no unacceptable effect on the standard of amenity appropriate to the established, permitted or allocated land uses of the local and host communities likely to be affected by the development. Policy WMP27a of the same Plan states that to conserve and enhance the local character and environment, permission will not be granted where the development would have a significant adverse impact on, inter alia, sites recognised for their cultural and historic significance. Policy WMP23a requires that all buildings associated with waste development should, inter alia, be of a scale, form and character appropriate to its location.

6.13 Saved Policy ST3 of the Lewes District Local Plan requires, inter alia, that development should respect the overall scale, height, massing and character of the local area and materials should be of a quality, type, colour and design which is appropriate to the character of the local area. Core Policy 11 of the Lewes District Joint Core Strategy seeks high quality design in new development so that it respects, and where appropriate, positively contributes to the character and distinctiveness of the District's unique built and natural heritage. This Policy also states that historic assets will be safeguarded.

6.14 The NPPF requires local planning authorities to take account of, inter alia, the positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining applications.

6.15 Similar issues apply to the consideration of the effect to Seaford Town Cemetery as to the effect on amenity in the section above. However, as well as the effect on amenity, consideration also needs to be given to the effect on the Cemetery as a heritage asset. Seaford Town Cemetery is the town's municipal burial site and dates from 1897. The older, larger southern part is split between consecrated ground and a dedicated area for the burial of Non-Conformists. The Chapel for services is also located in this part. The Cemetery has been extended to the east and includes smaller landscaped areas for children, Muslims, ashes and cremation memorial tablets. Wall-mounted tablets, or those set in a border, are also present at the northern side of the older part of the Cemetery.

6.16 Although the Cemetery is not designated as a heritage asset, it is nevertheless considered to be one by Lewes District Council. The District Council's Conservation Officer has raised concerns regarding the detrimental effect the new building would have on this heritage asset. The scale, form and character of the new building are not considered appropriate to its location, as it would have a dominating influence over the Cemetery and would make no positive contribution to the local character and distinctiveness of the District's built heritage. As such, the proposal conflicts with Policies WMP23a, WMP25 and WMP27a of the Waste and Minerals Plan, Saved Policy ST3 of the

Lewes District Local Plan and Core Policy 11 of the Lewes District Joint Core Strategy.

Traffic impact

6.17 Policy WMP26 of the Waste and Minerals Plan requires that development should, inter alia, provide for appropriate access arrangements; that there would be no unacceptable impact upon existing highway conditions in terms of traffic congestion and parking; and that there would be suitable arrangements for on site vehicle manoeuvring, parking and loading/unloading areas.

6.18 Despite the applicant stating that there would be no increase in vehicle movements, the throughput of waste is proposed to be increased from 20,000tpa to 75,000tpa and it would be likely that associated vehicle movements would increase. Even though, as the applicant notes, larger vehicles might be used, thereby reducing the numbers of smaller vehicles, there is uncertainty that, in reality, the overall numbers of movements would remain unchanged compared to the existing operation. Larger vehicles can have greater impact on amenity and the underlining conclusion is that the proposed scale of increase in throughput could only be achieved with higher traffic movements.

6.19 Furthermore, the proposal would result in the loss of areas of hardstanding, which currently accommodate waiting/parked vehicles, and so under this proposal, vehicles would be likely to have to queue outside the building on the road. This already represents a problem at this site and so would be likely to become more problematic under the current proposal. Moreover, the use of larger vehicles would be likely to exacerbate the situation in traffic terms. Vehicle activity outside the building would be likely to result in parking on pavements and lead to congestion on the road, thereby conflicting with Policy WMP26 of the Waste and Minerals Plan, with a corresponding loss of amenity, particularly for the occupiers and users of the adjoining Funeral Directors and Unit 4.

6.20 Although an area to the west of the new building has been identified for staff parking, no details have been provided, as the applicant is relying on this matter to be addressed at a later stage, subject to permission being granted. Given the overall reduction in areas of hardstanding at the site and the proposed increase in the numbers of employees, there could be a difficulty in providing adequate staff parking. Although the Highway Authority requires details of parking for staff to be submitted by condition, if planning permission is granted, sufficient on site provision might not be possible, which would conflict with Policy WMP26 of the Waste and Minerals Plan.

7. Conclusion and reasons for refusal

7.1 In accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 the decision on this application should be taken in

accordance with the Development Plan unless material considerations indicate otherwise.

7.2 The proposal is for the continued use of the site as a WTS and the erection of a replacement building. This approach is supported, in principle, by policies in the Waste and Minerals Local Plan in terms of managing waste. However, the new building would be significantly larger than the existing and would have a detrimental visual effect on other units on the Estate, including the adjoining Funeral Directors and Chapel of Rest and on the adjoining Cemetery and nearby residential properties. Consequently, there would be a conflict with Policy WMP25 of the Waste and Minerals Plan and Saved Policy ST3 of the Lewes District Local Plan. The WTS would increase its throughput of waste, which would be likely to result in an increase in the numbers of vehicles using the site, or at least an increase in the use of larger vehicles, and as a result of a loss of parking/waiting space, would be likely to lead to a corresponding increase in noise and dust emissions, parking on pavements and congestion on the road, which would adversely affect amenity, also contrary to Policy WMP25 and Saved Policy ST3, as set out above.

7.3 The size of the building and the increase in activities would be harmful to the Cemetery as a historic asset and its use by people seeking peace and reflection, thereby conflicting with Policy WMP27a of the Waste and Minerals Plan and Core Policy 11 of the Lewes District Joint Core Strategy.

7.4 The existing WTS premises are too small for the current operator but the proposal is too large to be satisfactorily accommodated at this site. Despite the benefits that may occur in terms of managing waste, it is considered that the proposed development is unacceptable in its impact on amenity, and, the Cemetery as a historic asset. In addition there are potential impacts arising from increased activity. On balance, the application as it stands should be refused planning permission.

7.5 In determining this planning application, the County Council has worked with the agent in a positive and proactive manner. The Council has also sought views from consultees and neighbours and has considered these in preparing the recommendation. This approach has been taken positively and proactively in accordance with the requirement in the NPPF, and as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

7.6 There are no other material considerations and the decision should be taken in accordance with the Development Plan.

8. Recommendation

8.1 To recommend the Planning Committee to refuse planning permission for the following reasons:

1. The proposed building would be of an inappropriate scale and height that would result in a harmful visual effect to the occupiers and users of

adjoining units on the Industrial Estate and to the occupiers and users of nearby residential properties and the Seaford Town Cemetery, which would result in a loss of amenity, thereby conflicting with Policy WMP25a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013 and Saved Policy ST3(a), (c) & (d) of the Lewes District Local Plan 2003.

2. The proposal will be likely to result in an increase in the activities of heavy goods vehicles inside and outside the site, which would result in an unacceptable increase in noise, dust, parking on pavements and congestion of the road, which would be harmful to the occupiers and users of other units on the Industrial Estate and to the occupiers and users of nearby residential properties and the Seaford Town Cemetery, which would result in a loss of amenity, thereby conflicting with Policies WMP25a and WMP26d of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013 and Saved Policy ST3(a), (c) and (d) of the Lewes District Local Plan 2003.
3. The proposed building which cannot be readily screened and the increase in operational activities would be harmful to the setting and use of Seaford Town Cemetery as a non-designated heritage asset, thereby conflicting with Policy WMP27a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013 and Core Policy 11 of the Lewes District Joint Core Strategy Proposed Submission Document 2013.
4. The proposal has not demonstrated that it would make a positive contribution to local character, or, be of a design that improves the quality of the area and the way it functions, in accordance with Section 7 of the National Planning Policy Framework 2012.

RUPERT CLUBB

Director of Communities, Economy and Transport
4 January 2016

BACKGROUND DOCUMENTS

Application file LW/754/CM
Site planning permissions
The Development Plan
NPPF