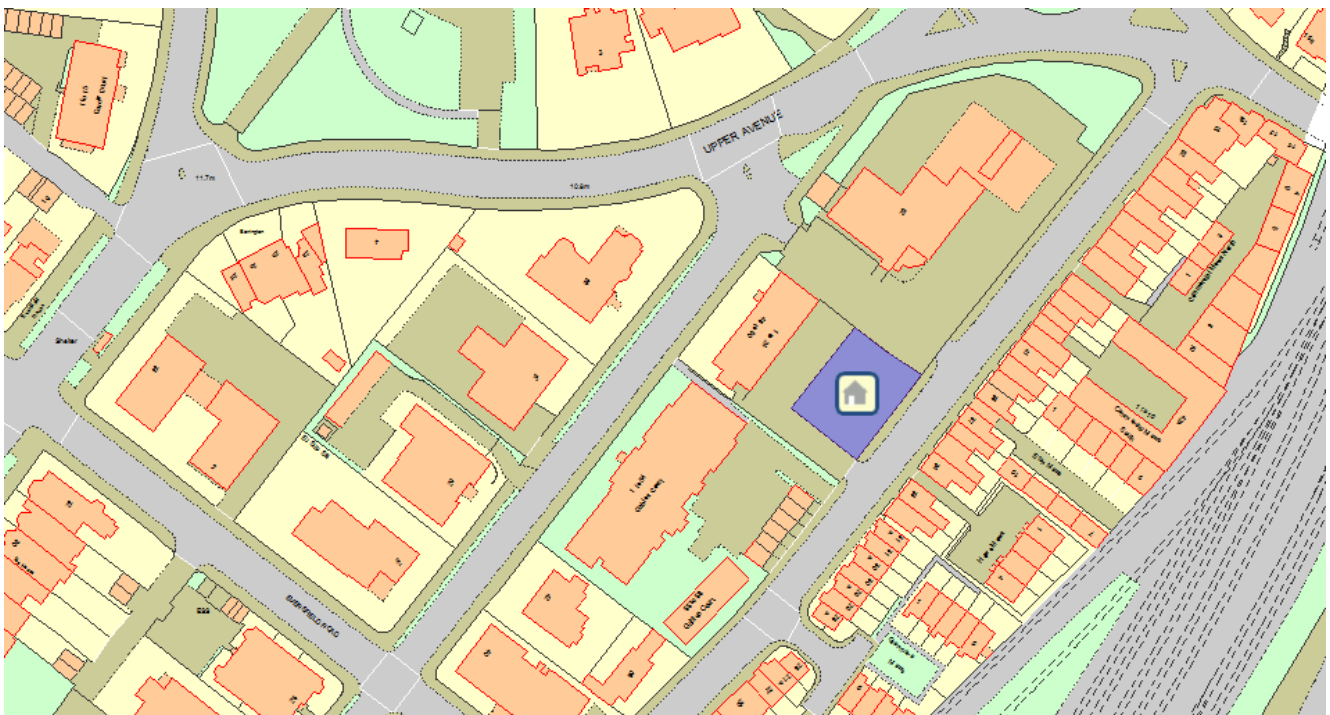


<b>App.No:</b> 180533	<b>Decision Due Date:</b> 8 <sup>th</sup> October 2018	<b>Ward:</b> Upperton
<b>Officer:</b> James Smith	<b>Site visit date:</b> 27 <sup>th</sup> July 2018	<b>Type:</b> Outline (some reserved)
<b>Site Notice(s) Expiry date:</b> 2 <sup>nd</sup> August 2018		
<b>Neighbour Con Expiry:</b> 2 <sup>nd</sup> August 2018		
<b>Over 8/13 week reason:</b> Scheme amended as original development was not acceptable in planning terms.		
<b>Location:</b> Land Rear Of 48 St Leonards Road, Commercial Road, Eastbourne		
<b>Proposal:</b> : Outline application (relating to Layout, Scale and Means of Access) for new build 3 storey residential accommodation consisting of 9 separate residential units (5 x 1 bed, 2 x 2 bed, 2 x 3 bed) with 11 allocated car parking spaces.  (AMENDED DESCRIPTION FOLLOWING REDUCTION IN SIZE OF PROPOSED DEVELOPMENT).		
<b>Applicant:</b> Mr G Khalil		
<b>Recommendation:</b> Approve conditionally		

**Contact Officer(s):**      **Name:** James Smith  
**Post title:** Specialist Advisor  
**E-mail:** James.Smith@Lewes-Eastbourne.gov.uk  
**Telephone number:** 01323 415026

**Map Location:**



## **1 Executive Summary**

- 1.1 The application has been brought to Committee during to more than 6 letters of objection being received, given that the officer recommendation is that the application is approved.
- 1.2 The application is for outline permission with some matters reserved (appearance and landscaping). The access, layout and scale of the development have been provided and will be considered within this report.
- 1.3 The provision of high density residential development within a town centre is actively encouraged by local and national planning policy and, as such, the principle of the development is considered to be acceptable. The principle has also been established as a smaller scheme for the site has already been approved.
- 1.4 The scale of the proposed roof extension has been reduced from that which was originally submitted in order to respond to officer concerns regarding the amenities of neighbouring residents. It is considered that the revised design would not result in unacceptable harm towards the amenities of neighbouring residents.

## **2 Relevant Planning Policies**

### **2.1 National Planning Policy Framework (Revised 2018)**

2: Achieving sustainable development  
4: Decision Making  
5: Delivering a sufficient supply of homes  
7: Ensuring the vitality of town centres  
9: Promoting sustainable transport  
11: Making effective use of land  
12: Achieving well designed places

### **2.2 Eastbourne Town Centre Local Plan 2013**

TC1: Character Areas  
TC6: Residential Development in the Town Centre  
TC10: Building Frontages and Elevations  
TC11: Building Heights

### **2.3 Eastbourne Core Strategy Local Plan Policies 2013**

B1: Spatial Development Strategy and Distribution Sustainable Centre  
B2: Sustainable Neighbourhood  
C1: Town Centre Neighbourhood Policy  
D5: Housing Low Value Neighbourhoods  
D10a: Design

## 2.4 Eastbourne Borough Plan Policies 2007

UHT1: Design of New Development  
UHT2: Height of Buildings  
UHT4: Visual Amenity  
HO20: Residential Amenity  
TR11: Transport & Parking

## 3 **Site Description**

- 3.1 The site falls within Eastbourne Town Centre. It is currently hard surfaced and is occupied by a car park that is enclosed by a low brick wall and railings, forming an annexe within the wider parking area to the rear of 48 – 50 St Leonards Road (Esher House). The site slopes gently downwards from west to east. There is also a slight downward slope to the rear of the site towards Esher House. Access to the car park is provided by way of an opening in the perimeter wall, adjacent to the car park serving St Marys House.
- 3.2 The site faces on to Commercial Road which is flanked by a mixture of commercial and residential buildings. The western side of the road is characterised by four and five storey buildings, the majority of which have flat roofs or mansard style flat roofing and were generally originally built to accommodate offices although a number have since been converted to residential use. These buildings generally face on to St Leonards Road, with the Commercial Road aspect being set back from the street and parking facilities being provided to the rear of the building.
- 3.3 The eastern side of Commercial Road is markedly different in character, being lined by domestic building, predominantly in the form of two-storey terraces of residential dwellings behind which are sites backing on to the railway which traditionally accommodated low rise small warehouses and industrial buildings, some of which have since been removed and replaced by mews style residential developments.

## 4 **Relevant Planning History**

- 4.1 100463  
Construction of three storey residential accommodation consisting of 12 dwellings and 7 car parking spaces.  
Refused - 06/12/2010 – Appeal Dismissed - 06/05/2011
- 4.2 150141  
New build 2 storey residential accommodation consisting of 7 dwellings and 7 car parking spaces. (Amended description).  
Refused - 09/07/2015 - Appeal Allowed - 26/02/2016
- 4.3 160538  
New build 3 storey residential accommodation consisting of 11 dwellings and 11 car parking spaces  
Refused – 16/11/2016

## **5 Proposed development**

- 5.1 The proposal seeks outline permission, with appearance and landscaping as reserved matters, for the erection of a three-storey flat roof building that would accommodate 9 separate residential units, (5 x 1 bed, 2 x 2 bed, 2 x 3 bed). Undercroft car parking would be provided at ground floor level, with 11 allocated car parking spaces in total.
- 5.2 The building would occupy a plot that would be annexed from the existing car parking area to the rear of 48-50 St Leonard's Road, a former office building which has been converted to residential flats. Other than a ground floor 2 bedroom unit, all flats would be located on the first and second floors.
- 5.3 The proposed building would measure approximately 24.35 metres in width by 16.5 metres in depth and 9.3 metres in height. This means the building would occupy the full width of the site and the majority of its depth, with room for small amenity areas and access retained to the front and rear.
- 5.4 The ground floor unit has access to a private terrace whilst all remaining units have access to private balcony space.
- 5.5 A new vehicular crossover would be formed on Commercial Road to provide designated access to the site.

## **6 Consultations**

### **6.1 Planning Policy:**

- 6.1.1 The Core Strategy states that the Town Centre Neighbourhood is one of the town's most sustainable neighbourhoods. It also states that 'The Town Centre will make an important contribution to housing needs as a sustainable centre. Future residential development will be delivered through conversions and changes of use of existing buildings'. Policy B1. As mentioned in the Spatial Development Strategy, explains that higher residential densities will be supported in these neighbourhoods. The site would be considered a brownfield site and the strategy states that 'in accordance with principles for sustainable development, it will give priority to previously developed sites with a minimum of 70% of Eastbourne's housing provision to be provided on brownfield land'.
- 6.1.2 This site would be considered a windfall site, as it has not been identified in the Council's Strategic Housing Land Availability Assessment (SHLAA). The application will result in a net gain of 9 residential units. The Council relies on windfall sites as part of its Spatial Development Policy B1, as stated in the Core Strategy.
- 6.1.3 The NPPF requires Local Planning Authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of housing. As of 1<sup>st</sup> April 2018, Eastbourne is only able to demonstrate a 3.26 year supply of housing land, meaning that Eastbourne cannot demonstrate a five-year housing land supply. The NPPF would view this application with a 'presumption in favour of sustainable development,' as described in paragraph

14 of that document. It is not considered that the proposal would be contrary to the NPPF as a whole, or contrary to any specific policies in the NPPF.

6.1.4 Policy TC6 of the Eastbourne Town Centre Local Plan covers residential development in the town centre. Proposals for new residential development in the Town Centre must demonstrate how the following details have been addressed:

- Protecting the amenity of residential occupiers by minimising potential conflicts between different land uses including noise disturbance, smell and vibration through the design and siting of servicing areas, ventilation and mechanical extraction, and external light sources.
- Provision of a mix of dwellings to include one, two and three bedroom units to suit the needs of a range of different occupiers.
- Provision of outdoor amenity space in the form of a shared communal garden, useable private balcony or roof terrace that forms an integral part of the design of the building.
- Provision of adequate bin and recycling storage that is screened from publicly accessible locations including adjoining streets, parking facilities and open space.

The application conforms to all of the above points. There are no obvious conflicts involving noise disturbance, smell and vibration. The development will provide a mix of one, two and three bedroom flats. There will be private balconies for each flat. Bins will be screened from view in a storage area.

6.2 ESCC Highways:

6.2.1 It is noted that previous applications (150141 and 160538) on this site for a similar scheme with a comparable parking ratio attracted a highway recommendation for approval. However, it is noted that the previous applications were unclear on whether parking was allocated or unallocated. This application states that parking is allocated and, as such, would require more spaces than is currently proposed. Given the existing parking pressures in the area, the overspill parking that would be likely as a result of this application could impact on highway safety and the flow of traffic on the local highway network. As such, I would recommend that this application is refused on highway grounds.

6.2.2 (Further response following receipt of revised plans) I have looked at the expected demand for the proposed composition on the ESCC Parking Demand Calculator. If the applicant were to provide allocated parking, then an expected demand of 12 vehicles would be expected. Whilst the difference between the expected demand (12) and the proposed parking provision (11) is small (1), it is considered that any overspill parking would also have to consider the displaced parking from the existing usage as an unofficial car park to the local highway network in addition to the overspill from the site, as this would potentially exacerbate a poor existing situation. As such, I would recommend that unallocated parking should be considered for at least some of the flats. If, for example, the one-bedroom flats were unallocated, and the two and three-bedroom were allocated, then the parking provision could be shown to accommodate proposed demand.

### 6.3 ESCC Drainage:

- 6.3.1 It is our understanding from the information submitted that the surface water management system for the site will incorporate green roofs before discharging into the public sewer network. However the applicant has not submitted information of discharge point, hydraulic calculations, capacity, and rate/connection agreements with Southern Water.
- 6.3.2 The public sewer record shows a public surface water sewer in St Leonard's Road approximately 30m away from the development. The connection to that sewer will involve the outfall pipe going through a land which appears to be owned by a third party. The applicant should submit written evidences by the owners of the third party land confirming that they authorise the passage of any drainage asset for their land.
- 6.3.3 The British Geological Survey data shows the site within an area potential for groundwater flooding to occur at surface and below the ground level. If an underground drainage feature is considered, the detailed design of that feature should be informed by findings of groundwater monitoring between autumn and spring. The design should leave at least 1m unsaturated zone between the base of the drainage structures and the highest recorded groundwater level. If this cannot be achieved, details of measures which will be taken to manage the impacts of high groundwater on the hydraulic capacity and structural integrity of the drainage system should be provided.
- 6.3.4 Nevertheless considering that the proposed planning application will not result in an increase in the impermeable area, and the green roof will suppose betterment in the current situation; therefore the Lead Local Flood Authority has no objection to this planning application.

## **7 Neighbour Representations**

- 7.1 Twelve letters of objection have been received from members of the public. The letters raise the following points:-
- 7.2
- Height is unsuitable. Would lead to loss of light and privacy.
  - Not enough parking is provided for the amount of flats proposed and an existing car park will be lost.
  - Would generate noise, dust and disruption.
  - Unsafe access for cars
  - Construction workers would park on surrounding roads.
  - Overdevelopment of the site
  - Previous applications have been turned down by the Council.
  - Occupants would park on neighbouring property.

## **8 Appraisal**

### 8.1 Principle of development:

- 8.1.1 Para. 11 of the revised NPPF (2018) states that decision taking should be based

on the approval of development plan proposals that accord with an up-to-date development plan without delay.

- 8.1.2 Where the policies that are most important for determining the application are out of date, which includes, for applications involving the provision of housing, situations where the local authority cannot demonstrate a five year supply of deliverable housing sites, permission should be granted unless any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the Policies in the NPPF as a whole.
- 8.1.3 Currently, Eastbourne is only able to demonstrate a 3.26 year supply of land. This proposal, for 11 additional units, would make a contribution towards increasing the number of year's supply of housing land.
- 8.1.4 Para 85 (f) of the NPPF recognises that residential development often plays an important role in ensuring the vitality of town centres and encourages residential development on appropriate sites.
- 8.1.5 Para. 118 of the NPPF states that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Development of under-utilised land and buildings should be promoted and supported, especially where this would help to meet identified needs for housing. The potential for development of car parks is specifically mentioned in part d) of the paragraph.
- 8.1.6 In regards to the increase in number of flats provided over those approved under 150141, para. 123 of the NPPF states that, 'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities'. Part a) of the paragraph states that a significant uplift in residential densities within town centres is required. Policy B1 of the Eastbourne Core Strategy recognises the Town Centre Neighbourhood as a sustainable neighbourhood and Policy C1 suggests development of 180 dwellings per hectare as being an appropriate density.
- 8.1.7 It is therefore considered that the site represents an appropriate location for high density residential development, subject to accordance with relevant up-to-date policies within the Core Strategy and Eastbourne Borough Plan.
- 8.2 Impact of the proposed development on amenity of adjoining occupiers and surrounding area:
  - 8.2.1 It is noted that in dismissing the appeal for application 100463, which was for a three-storey building, the appeal inspector did not consider that a building of this height would have an adverse impact upon the amenities of the occupants of properties on Commercial Road. Esher House was still in office use at this time so amenity impacts on this building were not taken into consideration.
  - 8.2.2 The proposed building would be positioned to the rear of 48-50 St Leonard's Road (Esher House), a 6-storey building (with basement level parking) which was originally in use as offices but has since been converted to residential use.

Approximately 12.4 metres would be maintained between the rear elevation of Esher House and the rear elevation of the proposed building. Although the degree of separation is less than is commonly the case for new development, it is consistent with the more intimate spatial characteristics of the surrounding town centre environment. This is demonstrated by the relationships between other nearby buildings such as 1 – 54 Gable Court and 55 – 58 Gable Court as well as the mews properties on Commercial Road. It is also noted that the precedent of a building with an identical footprint to the proposed, albeit a two-storey building, has been established following the approval of 150141.

- 8.2.3 The building frontage is stepped slightly back from the road, in a similar arrangement to other nearby buildings facing on to the northern side of Commercial Road, with over 15 metres maintained between in and dwellings on the opposite side of the road. It is considered that this represents a standard relationship between buildings on opposing sides of roads and, given this, and the modest height of the building, aided by the use of a flat roof, it is not considered that the proposed building would appear overbearing towards properties on Commercial Road.
- 8.2.4 Given that the ground floor of Esher House is used as a basement level car park, the only properties with their outlook impacted as a result of the development would be first and second floor flats. As the proposed building would be only three-storeys in height, and the third-storey would be recessed from the front and rear elevation, it is considered that the proposed building would not appear oppressive, with outlook offered to the sides and above the structure. It is also considered that the height of the building, in relation to neighbouring habitable room windows, would not be so great as to cause undue levels of overshadowing towards these rooms.
- 8.2.5 The proposed building would include flats with habitable room windows within the rear elevation that would face towards habitable room windows on the rear elevation of Esher House. This relationship would be no different to that of the approved two-storey building (150141). The majority of the windows would serve bedrooms rather than more frequently used rooms such as the main living area. It is therefore considered that the level of overlooking offered by the proposed building would not be invasive. It is considered that a sufficient amount of separation would be maintained between the building frontage and dwellings on Commercial Road. It is also noted that the windows on the building frontage are slightly angled so as not to look directly towards those properties. As such, it is not considered that these properties would be subjected to invasive levels of overlooking.
- 8.2.6 Balconies would be provided for first and second floor flats, on the eastern (front), southern (side) and western (rear) elevations. The rear elevation, which is within the closest proximity of any neighbouring residential properties, has only one balcony which is modestly sized and would not allow for large congregations of people to gather on it. As such, it is not considered that this balcony would result in disturbance to the occupants of properties within Esher House.
- 8.2.7 The proposed residential use of the development would be compatible with the



surrounding environment which includes residential flatted development of similar and larger scale to the proposed scheme as well as office uses.

### 8.3 Impact of the proposed development on amenity of future occupants:

- 8.3.1 The individual units within the proposed building all comply with 'Technical housing standards – nationally described space standard' in terms of overall floor area as well as room sizes. Each unit has an uncomplicated internal layout that would allow for ease of circulation.
- 8.3.2 All habitable rooms would be served by windows that would allow for a suitable level of natural light permeation as well as adequate ventilation. A number of the units are dual aspect, which further increases the effectiveness of natural lighting and ventilation.
- 8.3.3 All units have access to private outdoor amenity space whilst there is also a small amount of outdoor communal space. It is considered that the amount of amenity space provided is sufficient given the building would house predominantly small residential units that have good access to the town centre and nearby public open space such as Hartfield Square Gardens which is an approximately 120 metre walk from the site. It is therefore considered that future occupants would have access to adequate outdoor amenity space.
- 8.3.4 The site is located within the town centre where the buildings in the immediate surrounding area are in mixed use, primarily for residential and office purposes. There are no heavy industrial or other noise generating uses within close proximity that would have the potential to detract from the amenities of future occupants or have their continued operation prejudiced against by the presence of residential flats.

### 8.4 Design Issues:

- 8.4.1 Whilst the final appearance of the development is a reserved matter, the application includes details of layout and scale and, therefore, the parameters for footprint, building height and mass would be dictated by these characteristics. The height, mass and footprint of the building shown on the submitted elevation plans could therefore not be altered at the reserved matters stage.
- 8.4.2 The proposal would introduce a three-storey flat roof building in a prominent position within the Commercial Road street scene. Although there is not continuous development fronting onto the northern side of Commercial Road, there is a ribbon of such development adjacent to the site, comprised of 55 – 58 Gable Court and associate garages and 59 Commercial Road (Limes Cottage). There is no formal building line along this part of the road but the proposed building would be set slightly back from the road with a low brick wall and railings adjacent to the street, in a similar arrangement to the existing buildings.
- 8.4.3 The flat roof design of the proposed building would appear in keeping with the appearance of the surrounding area due to the presence of a number flat roof buildings, primarily on St Leonard's Road, which back on to Commercial Road.

These buildings are generally of multiple storeys and are set on higher ground, increasing their prominence. The proposed building would be lower than the building on St Leonard's Road behind it and this would ensure that a smooth visual transition between the taller buildings on St Leonard's Road and the lower, more domestic scale buildings on Commercial Road is maintained, preventing the development from appearing jarring or incongruous.

8.4.4 The third storey of the proposed building would be recessed and utilise external finishes that contrast with the remainder of the building. It is considered that these design attributes would reduce the visual impact of the building, break up its mass and prevent the building from appearing monotonous within the street scene.

8.4.5 The site is located within the town centre where the buildings in the immediate surrounding area are in mixed use, primarily for residential and office purposes. There are no heavy industrial or other noise generating uses within close proximity that would have the potential to detract from the amenities of future occupants or have their continued operation prejudiced against by the presence of residential flats.

8.4.6 The proposed building possesses a wide frontage which contains a number of windows and openings, ensuring it presents as a principal elevation and engages effectively with the overall street scene

#### 8.5 Impacts on Highways Network or Access:

8.5.1 The proposal would involve the loss of a parking area which is currently used for parking by staff working in the offices at the neighbouring building, 52 St Leonards Road (St Marys House). It is accepted that the proposal would result in the loss of some parking, although the offices will continue to be served by the car park within the St Marys House site curtilage. The principle of the development of this car park has already been established through earlier approvals. ESCC Highways have stated that, as the car park site is under separate ownership, its continued use as a car park cannot be controlled and can be removed at any time.

8.5.2 The proposed new crossover that would serve the development is of acceptable dimensions and would not present any hazard to traffic. The new access is required as the current access to the site is on the St Marys House site and use of this access for the development would require the crossing of third party land.

8.5.3 It is not considered that the proposed use would generate an increase in traffic that would be unsustainable for the surrounding road network. The ratio of parking provided, at 11 spaces serving 9 units (1.2 spaces per unit), would be higher than that of the previously approved scheme (1 space per unit). It is considered that this quantum of parking is acceptable, provided at least some of the parking spaces are retained as unallocated as statistics show that this discourages high levels of car ownership within developments. The site is also within a Town Centre location with good levels of access to public transport, reducing reliance of private motor vehicles. Secure, covered cycle parking is also included to further encourage use of sustainable transport methods.

8.5.4 Given the potential for disruption during the construction of the development, a condition will be attached to any approval granted to require the submission and approval of a Construction Traffic Management Plan to include, but not be restricted to, details relating to traffic management, contractor parking, hours of deliveries and storage of plant, machinery and building materials.

## **10 Recommendation**

10.1 It is recommended that the application is approved, subject to the following conditions:-

10.2 The development hereby permitted shall be commenced before the expiration of three years from the date of this permission or two years from the approval of the last of the reserved matters as defined in condition 2 below, whichever is the later.

Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions and to comply with Section 92 of the Town and Country Planning Act 1990.

10.3 Details of the reserved matters set out below (“the reserved matters”) shall be submitted to the Local Planning Authority for approval within three years from the date of this permission:

- i) appearance (including full schedule of external materials);
- ii) landscaping (including details of the green roof).

The reserved matters shall comply with the parameters set out for access, scale and layout established by this outline permission and be carried out as approved. Approval of all reserved matters shall be obtained from the Local Planning Authority in writing before any development is commenced.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 (as amended) of the Town and Country Planning Act 1990.

10.4 The development hereby permitted shall be carried out in accordance with the following approved drawings:-

A002 - Site Plan;  
D001 Rev. A - Ground Floor Plan as Proposed;  
D002 Rev. A - First Floor Plan as Proposed;  
D003 Rev. A - Second Floor Plan as Proposed;  
D005 Rev. A - South Elevation as Proposed;  
D006 Rev. A - West Elevation as Proposed;  
D007 Rev. A - North Elevation as Proposed;  
D008 Rev. A - East Elevation as Proposed;

Reason: For the avoidance of doubt and in the interests of proper planning.

10.5 The development hereby permitted shall not be occupied until the new site access crossover shown on approved plan D001 Rev. A has been constructed and surfaced. The crossover shall thereafter be maintained in place throughout the lifetime of the approved development.

Reason: In the interests of highway safety and accessibility.

10.6 The development hereby permitted shall not be occupied until the 11 x car parking spaces shown on approved plan D001 Rev. A have been surfaced and marked out. The parking spaces shall thereafter be maintained throughout the lifetime of the development and the land on which they are positioned be used for no purpose other than for the parking of vehicles.

Reason: To ensure adequate parking provision for the development and to prevent overspill to on street car parking in accordance with Policy TR11 of the Eastbourne Borough Plan (2007).

10.7 The allocation of parking spaces to specific flats shall only be allowed with the prior written approval of the Local Planning Authority. A proportion of parking spaces must be retained as unallocated at all times.

Reason: To ensure adequate parking provision for the development and to prevent overspill to on street car parking in accordance with Policy TR11 of the Eastbourne Borough Plan (2007).

10.8 The development shall not be occupied until the cycle parking area has been provided in accordance with approved plan D001 Rev. A and the area shall thereafter be retained for that use and for no other purpose.

Reason: On order to support the use of sustainable methods of travel.

10.9 Prior to the commencement of development, a Construction Traffic Management Plan (CTMP) shall be submitted to and approved by the Local Planning Authority in consultation with the Highway Authority. This shall include the size of construction and delivery vehicles, wheel cleaning facilities, traffic management (to allow safe access for construction vehicles), contractor parking and a compound for plant/machinery and materials clear of the public highway. Associated traffic should avoid peak traffic flow times.

Reason: In the interests of highway safety and the amenities of neighbouring residents.

10.10 Prior to commencement of development, a surface water management scheme shall be submitted to and approved by the Local Planning Authority. This should include, but not be limited to, the following details:-

- If surface water is to be discharged into the public sewer, it should be limited to a rate agreed with the utility provider and be no more than the existing run-off rate for all rainfall events, including 1 in 100 years (plus climate change). Evidence must be provided in the form of hydraulic calculations which take connectivity of the drainage system as well.

Evidence of a rate of discharge being agreed with the utility provider must also be included.

- The condition of the surface water sewer which will take surface water runoff from the development shall be investigated and any required improvements that would be required.
- If relevant, evidence that third party landowners agree to the passage of drainage assets across their land.
- A management and maintenance plan for the entire drainage system clearly stating who will be responsible for managing all aspects of the surface water drainage system, including piped drains, and evidence that the plan will remain in place throughout the lifetime of the development.

Reason: In order to prevent an increase in surface water flood risk.

Informative:

The applicant will be required to enter into a Section 184 Licence with East Sussex Highways for the provision of a new vehicular access. The applicant is requested to contact East Sussex Highways (0345 60 80 193) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the licence being in place.