

PLANNING STATEMENT

69-71 BUTTS GREEN ROAD,
HORNCHURCH, RM11 2LD

SPDSTUDIO
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Client: Shaun Wright

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1 INTRODUCTION

This Planning Statement had been prepared by Sustainable Planning Design Studio ('SPD Studio') on behalf of Shaun Wright ('the applicant') in support of a full planning application submitted to the London Borough of Havering ('LBH') for the construction of a new commercial building at 69-71 Butts Green Road, Hornchurch, RM11 2LD ('the site').

The proposed description of development is as follows:

'Demolition of the existing buildings and the construction of 2 storey commercial building with a mezzanine comprising a car showroom at ground floor (sui generis) and office space on upper levels (Use Class E), and associated landscaping and parking.'

1.1 BACKGROUND TO PROPOSALS

This application is a resubmission of application ref. P1103.23 which was refused by LBH on 13th October 2023 for the following reasons:

- 1. The proposed development would, by reason of its inappropriate siting, height, bulk, mass, and external appearance would appear as an unacceptably dominant and visually intrusive feature in the streetscene harmful to the appearance of the surrounding area contrary to Policy 26 (Urban design) of the adopted Local Plan 2021 and policies D1 and D4 of the London Plan 2021 and the NPPF which seeks high quality of design.*
- 2. There is insufficient information with respect to the ground floor car show room access to and from the highways. In the absence of such information there is concern the proposal would have an adverse impact upon the safe condition of the road users as well the traffic flow in this section of the highways, contrary to Policy 23 of the Local Plan 2021.*

This revised application seeks to address these reasons for refusal through an updated design, most notably through a reduction in the overall height of the proposed building.

1.2 APPLICATION DOCUMENTS

This Planning Statement summarises the development proposal and provides an assessment in accordance with relevant National and Local planning policy guidance, and other material considerations.

This planning statement should be read in conjunction with the following drawings and reports submitted as part of the application, to address the full range of material planning considerations:

- Covering Letter - Prepared by SPD Studio;
- Planning Application Form - Prepared by SPD Studio;
- Community Infrastructure Levy Form - Prepared by SPD Studio;
- Planning Statement - Prepared by SPD Studio;
- Application Drawings Pack - Prepared by SPD Studio;
- Sustainability Statement - Prepared by SPD Studio;



- Access and Materials Statement - Prepared by SPD Studio;
- Flood Risk Statement - Prepared by SPD Studio; and
- Archaeological Impact Assessment - Prepared by Armour Heritage.



2 THE SITE

The site measures 0.03ha and is located on the western side of Butts Green Road, Hornchurch at the corner of the junction with Wykeham Avenue. The application site is shown hatched in red in Figure 1 below.



Figure 1: Site Location

The site is currently occupied by 'Imperials Hornchurch' car dealership which comprises a single storey building, and a large area of hardstanding used for the display of cars. The site forms part of a small shopping parade which is allocated as a Local Centre in the adopted Local Plan.

The site is bound to the north by a single storey retail unit, to the west by Butts Green Road, to the south by Wykeham Avenue, and the east by two storey residential properties.

The site has a PTAL of 2 which is considered low however the site is located 0.2 miles (4 min walk) north of Emerson Park station. Emerson Park provides access to the London Overground line which operates routes towards Romford and Upminster. The site is also well served by local buses with a bus stop located a 1-minute walk away.

The site does not contain any statutory or non-statutory Listed Buildings, nor is it located within a Conservation Area. The site fronts onto but lies just outside of the Emerson Park Policy Area.



A review of the Environment Agency's flood risk mapping facility identifies that the entirety of the site is located within Flood Zone 1. Land in Flood Zone 1 has less than 0.1% annual probability of river or sea flooding.

Butts Green Road comprises a mix of building types and uses with some commercial units at ground floor and residential above. The wider surrounding area is predominantly residential in character comprising large two storey detached and semi-detached properties.



3 PLANNING HISTORY

3.1 THE SITE

P1103.23 - Demolition of the existing building and the construction of 3 storey commercial building comprising a car showroom (sui generis) at ground floor and office space (Use Class E) on first and second floors, and associated landscaping and parking. Refused on 13th October 2023 for the following reasons:

- 1. The proposed development would, by reason of its inappropriate siting, height, bulk, mass, and external appearance would appear as an unacceptably dominant and visually intrusive feature in the streetscene harmful to the appearance of the surrounding area contrary to Policy Policy 26 (Urban design) of the adopted Local Plan 2021 and policies D1 and D4 of the London Plan 2021 and the NPPF which seeks high quality of design.*
- 2. There is insufficient information with respect to the ground floor car show room access to and from the highways. In the absence of such information there is concern the proposal would have an adverse impact upon the safe condition of the road users as well the traffic flow in this section of the highways, contrary to Policy 23 of the Local Plan 2021.*

3.2 THE SURROUNDING AREA

The following applications are considered to be of relevance to the proposal:

67 Butts Green Road

- P0223.21 - Regularise the existing car storage use associated with the adjacent car showroom at 69-71 Butts Green Road. Refused 20th April 2021.
- E0012.19 - Use of rear part of the site for the parking of cars in association with lawful office use. Refused and appeal dismissed 11th December 2020.
- P0467.19 - Change of use of Suite 3 from office to beauty salon. Approved 30th June 2019.
- P1670.15 - Proposed rear extension at 4m to both ground and first floor, with conversion of the existing building into three separate self contained apartments with associated amenity and parking. Withdrawn 3rd August 2017
- J0012.15 - Prior approval application for the change of use from vacant office building to 1no. residential family dwelling (C3). Prior approval given 25th June 2015.
- P0133.15 - Proposed demolition of existing dormant (derelict building) and replacement with 5 x 2 bed new build flats with associated parking, boundary treatment and amenity area. Refused and appeal dismissed 5th August 2016.
- P1188.12 - Change of use of ground floor from B1 (office) to D1 doctor's surgery with ground floor rear extension with balcony over, extension to front porch and provision of separate entrance to retained offices on upper floors. Approved 19th February 2013.



4 PRE-APPLICATION DISCUSSIONS

Following the refusal of application ref. P1103.23 the Applicant sought to engage with LBH through further pre-application discussions.

The following amended drawings were submitted on 14th November 2023 alongside detailed commentary which responded to each of the design comments set out within the published officer report.



Figure 2: Proposed Elevations

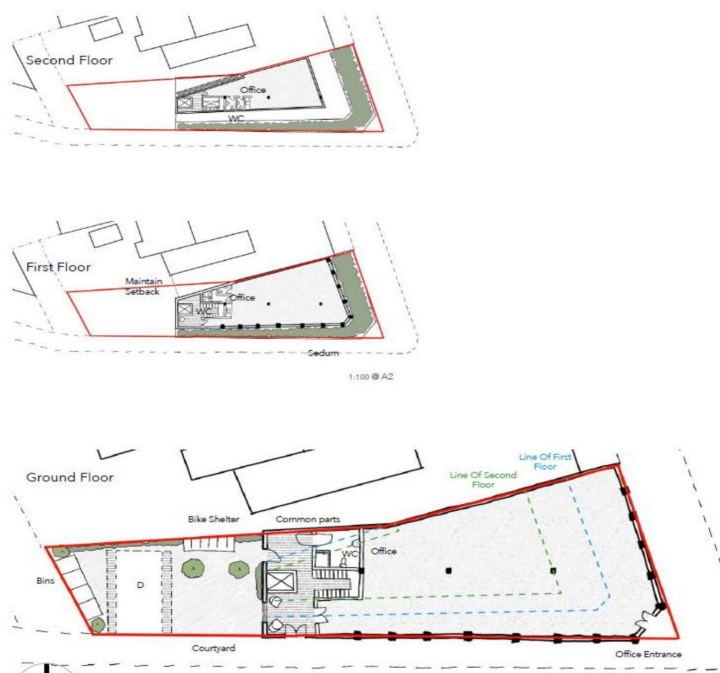


Figure 3: Proposed Floorplans



The following table sets out the feedback received from LBH design officers alongside the intended design response:

LBH Feedback	Design Response
<i>The building proposal addresses the street corner with a chamfered building edge to create a relationship with the street and to position the main entrance door.</i>	Noted
<i>Inappropriate 3 storey building height, the proposals height is inconsistent with the neighbouring single storey heights of the retail frontages. Removal of the top building storey would allow the proposal to proportionally relate to the neighbouring retail frontages. Stepping up and setting back by one storey would comfortably define the position of the building at this prominent street corner.</i>	Height to be reduced to appear as two storey building with an internal mezzanine at first floor to deliver additional floorspace.
<i>The setback treatment for upper floor along Butts Green Road and Wykeham Road is appropriate but the rationale for the setback treatment to the rear/ courtyard area is unclear.</i>	The setback has been designed in response to the comments in the officer report which commented that ' <i>the rear part of the building along Wykeham Road has minimum set down and is not subordinate as may be expected. on a corner plot.</i> ' An additional setback is therefore included to ensure residential amenity for neighbouring residents is maintained.
<i>The ground floor retail glazed bays create an appropriate character that relates to the existing neighbouring retail frontages however the 'grey' indicated area for signage is misaligned with the neighbouring signage panels. The ground floor elevation treatment should be carefully arranged at a similar geometry to the existing neighbouring properties so the proposal connects into the existing character seamlessly.</i>	Signage to be altered to align with existing neighbouring retail units.
<i>Consider the solar shading treatment</i>	Brise Soleil to be included in the proposal
<i>Access and maintenance for the sedum roof needs to be demonstrated</i>	Included in the proposal
<i>Safe pedestrian access to the courtyard requires consideration.</i>	Proposal will include a different ground material to highlight pedestrian access.



5 PROPOSED DEVELOPMENT

This application seeks Full Planning Permission for the construction of a 2 storey commercial building. The proposed description of development is as follows:

'Demolition of the existing buildings and the construction of 2 storey commercial building with a mezzanine comprising a car showroom at ground floor (sui generis) and office space on first floor and mezzanine level (Use Class E), and associated landscaping and parking.'

Specifically, the proposed development comprises:

- 213.6sqm car showroom unit (Sui Generis) at ground floor;
- 228.9sqm of office floorspace (Use Class E) over first and mezzanine floors;
- 1 x disabled parking bay; and
- Landscaping.

The proposal seeks to redevelop and optimise a low-quality brownfield site with the delivery of a new high quality modern commercial building within this local centre in Hornchurch.



6 PLANNING POLICY

6.1 INTRODUCTION

This section within the planning statement identifies the key policies, both nationally and locally, that are relevant to the consideration of this application.

A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision-making process. In accordance with Section 38(6) of the Planning and Compulsory Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

For the purpose of this application, the Development Plan for Havering comprises:

- Havering Local Plan 2016-2031 (2021);
- Policies Map (North) (2021);
- Policies Map (South) (2021);
- Joint Waste Development Plan (2012);
- Site Specific Allocations (2008);
- Site Specific Allocations in the Romford Area Action Plan (2008); and
- The London Plan (2021).

Additional material considerations include:

- National Planning Policy Framework (2023); and
- LBH Supplementary Planning Documents (SPDs).

6.2 HAVERING LOCAL PLAN

The following Local Plan policies are relevant to consider in the determination of the proposal:

- Policy 13 – Town Centre Development
- Policy 19 – Business growth
- Policy 24 – Parking provision and design
- Policy 26 – Urban Design
- Policy 27 – Landscaping
- Policy 28 – Heritage Assets
- Policy 32 – Flood Management
- Policy 34 – Managing Pollution
- Policy 35 – Waste Management

6.3 THE LONDON PLAN

The following London Plan policies are relevant to consider in the determination of the proposal:

- GG2 – Making the best use of land
- D3 – Optimising site capacity through the design-led approach



- D4 - Delivering good design
- D5 - Inclusive Design
- E1 - Offices
- E9 - Retail, markets and hot food takeaways
- SI 12 - Flood risk management
- SI 13 - Sustainable Drainage
- T1 - Strategic approach to transport
- T2 - Healthy streets
- T4 - Assessing and mitigating transport impacts
- T5 - Cycling
- T6.2 - Office Parking

6.4 NATIONAL PLANNING POLICY FRAMEWORK

The Government published an updated National Planning Policy Framework (NPPF) in December 2023. The NPPF sets the framework for the preparation of development plans and is a material consideration in planning decisions. The NPPF sets out the purpose of the planning system is to contribute to the achievement of sustainable development taking account of economic, social and environmental objectives – all of which should be considered to be interdependent and therefore need to be pursued in mutually-supportive ways.

So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development. For decision-taking this means 'approving development proposals that accord with an up-to-date Development Plan without delay' (Paragraph 11).

Section 12 of the NPPF emphasises the important role of high-quality design in the pursuit of delivering sustainable development. The NPPF sets out a clear rationale for high quality design, reinforcing that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

The NPPF acknowledges that the planning system should promote effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 123).

Paragraph 124 c) identifies that decisions should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."



7 PLANNING ASSESSMENT

This section assesses the proposed scheme against the development plan and identifies other material considerations of weight where appropriate. The key matters to consider are as follows:

- Principle of Development;
- Design;
- Impact on Amenity;
- Transport;
- Flood Risk; and
- Archaeology.

7.1 PRINCIPLE OF DEVELOPMENT

The purpose of the planning system is to achieve sustainable development, with the NPPF identifying three overarching objectives of the planning system in achieving sustainable development; an economic objective; a social objective; and an environmental objective.

At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11) which is fundamental in achieving the sustainable development. In this context, paragraph 11 of the NPPF requires Local Planning Authorities to approve without delay development proposals that accord with an up-to-date development plan. Where the development plan is absent, silent or out-of-date, the default position is for permission to be granted, unless any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. The NPPF also promotes the effective and efficient use of under-utilised land and buildings to meet the need for new homes and other strategic uses (paragraph 123).

At the strategic level, the London Plan reflects the objective of delivering sustainable development and acknowledging the importance of making efficient use of land. This includes creating places of higher density in appropriate locations to get more out of limited land. The London Plan states that growth should therefore be directed towards the most accessible and well-connected places, ensuring a compact and well-functioning city.

More specifically, Policy GG2 of the London Plan states that those involved in planning and development must; enable the development of brownfield land; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well- connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; and applying a design-led approach to determine the optimum development capacity of sites.

London Plan Policy E1 recognises the need to provide high quality, flexible and adaptable office space to meet a variety of needs. New office developments should be supported by improvements to walking, cycling and public transport connectivity and capacity. Policy E9 supports *'the creation of a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners.'*

Havering's spatial strategy seeks to direct an appropriate scale of retail, culture, service industries and office development to the boroughs network of town, district and local centres. The site is



located within a designated local centre. Local Plan Policy 19 supports development proposals which will improve the physical appearance, attractiveness and competitiveness of employment areas.

The site is currently in use as a car dealership and therefore the principle of a commercial use is already established. The proposal seeks to deliver the car showroom use at ground floor alongside office space across the two upper floors. The car showroom subject of this application will likely have significantly less footfall than the existing arrangement. The intention is to display one high-end car on the ground floor with associated office space.

The proposal is considered to be in keeping with the character and function of the local centre and is consistent with the uses expected within a retailing destination. The proposal will also redeliver an active shopfront at ground floor in line with the existing shopping parade. Furthermore, the proposal will result in the redevelopment of a brownfield site in a sustainable location to deliver an uplift in commercial floorspace space, making efficient use of the site in line with the requirements of the NPPF and London Plan.

The proposal is consistent with all relevant national, strategic and local policies and should be considered acceptable in principle. It is noted that the principle of development was accepted in the assessment of the previous application (ref. P1103.23).

7.2 DESIGN

Section 12 of the NPPF stresses the fundamental importance of high-quality, beautiful design in the pursuit of delivering sustainable development. The NPPF sets out a clear rationale for high quality design, reinforcing that "good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

At the strategic level, London Plan Policy GG1 seeks to ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements.

Policy D2 explains that the density of development proposals should consider, and be linked to, the provision of future planned levels of infrastructure; and be proportionate to the site's connectivity and accessibility.

London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Development proposals should enhance the local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due consideration of surrounding context. Development should also achieve safe, secure and inclusive environments, with appropriate outlook, privacy and amenity. Architecture should be of a high-quality, adhering to sustainable design principles, whilst also providing active frontages to generate liveliness and interest within the public realm. Policy D5 requires development proposals to achieve the highest standards of accessible and inclusive design.

At the local level, Local Plan Policy 26 promotes high quality design that contributes to the creation of successful places. The Council will support developments that are informed by and complement the character of the site and surroundings and demonstrate high architectural quality and design. Proposals are also expected to respond to distinctive local building forms and patterns of



development and respect the established scale, massing, rhythm of the buildings, and the height of the surrounding physical context.

The design of the building was discussed with officers ahead of submission and the proposal has sought to address the comments received as per the table on page 7. Whilst the proposal will involve the creation of a larger building on site, it exhibits high quality design which seeks to enhance and complement the existing street scene.

The proposal redelivers an active frontage at ground floor to mirror the existing buildings in this designated local centre. In addition, the upper floors of the proposed building are set back slightly to retain the appearance of a single storey shopfront at street level to align with the existing shopping parade. Whilst the proposal involves an increase in height on site, it sits below the height of the existing building at 67 Butts Green Road and is considered an appropriate response for this corner site. In terms of materiality, the proposal incorporates large areas of glazing alongside brick and panelling in colours that respond to the existing locality.

In summary, the proposed development is considered to be a high quality and well designed scheme that respects and complements the site's setting. As such, the proposed development fully accords with the Development Plan. The detailed design of the proposals is set out in the architectural drawings, and accompanying access and materials statement, submitted as part of the application.

7.3 IMPACT ON AMENITY

Achieving well-designed places is a key objective of the NPPF, with development proposals expected to *'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users'*.

Local Plan Policy 34 supports development proposals that do not unduly impact upon amenity, human health and safety, and the natural environment by noise, dust, odour etc. Developments are expected to optimise the design, layout and orientation of buildings and the use of green infrastructure to minimise exposure to the above pollutants.

The site is located within an existing shopping parade and will redeliver a similar use to the existing situation; and therefore it is not expected to lead to any detrimental impact on neighbouring occupants or the natural environment. Given the proposed use, the intention is that the building will be in open and in use during typical working hours.

The proposal includes some landscaping at the rear of the site fronting Wykeham Avenue which is considered to improve and soften the appearance of the site and have a positive impact on the overall street scene.

7.4 TRANSPORT

The NPPF requires development proposals to take appropriate opportunities to promote sustainable transport, provide safe and suitable access for all users; and ensure any significant impact on existing transport networks can be acceptably mitigated. Paragraph 115 of the NPPF states that development proposals should only be refused on highways grounds where they are assessed to have an unacceptable impact on highway safety or the cumulative impact on the road network would be severe.



At a strategic level Policy T2 of the London Plan (March 2021) requires proposals to reduce the dominance of vehicles on London's streets and ensure proposals are permeable by foot or bicycle and connect to existing local walking and cycle networks and public transport. Policy T1 of the London Plan sets out the Mayor of London's strategic target for 80% of all trips in London to be made via foot, cycle or public transport by 2041, with development proposals expected to contribute towards meeting this target. Policy T6.2 sets a maximum parking provision for offices of 1 space per 100sqm.

Local Plan Policy 23 supports and encourages developments that are located in areas most accessible by a range of transport options. The Council supports development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated. Policy 24 sets out that London Plan parking standards are applicable to all developments.

It is noted that the pre-application advice received in relation to a residential scheme stated that a car-free development would be acceptable on this site and therefore we have applied this approach to the current scheme, with the exception of one disabled parking bay at the rear of the site. A commercial use is expected to be even less reliant on car parking than a residential use and therefore a car-free scheme is considered the most appropriate and sustainable option to support the proposal.

The existing situation in regard to vehicle access and parking on site will be substantially improved by the proposals, with just one car proposed to be on display in the ground floor showroom. The submitted drawings demonstrate how the glazing at ground floor can be opened to allow vehicle access when required.

The proposal also includes sufficient cycle parking spaces in line with the requirements of the London Plan.

7.5 FLOOD RISK

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (paragraph 165). Additionally, developments which are required to pass the Exceptions Test (as set out in the NPPF and associated Technical Guidance) will need to address flood resilient design and emergency planning.

Policy SI 12 of the London Plan reflects the overarching objectives of the NPPF, stating that proposals should ensure flood risk is minimised and mitigated, and residual risk is addressed. Policy SI 13 outlines the policy presumption for development proposals to utilise sustainable drainage systems, which should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the well-established drainage hierarchy.

Local Plan Policy 32 sets out that the Council will support developments that seek to avoid flood risk to people and property and manages residual risk. It is expected that developments identify suitable opportunities for reducing flood risk and incorporate resilient design and construction so as not to increase the risk of flooding.

A Flood Risk Statement has been prepared by SPD Studio and submitted in support of this Full Planning Application. The statement concludes that as the site falls within Flood Zone 1 it is not at risk of flooding. The site is at low risk of flooding from all sources. The surface water drainage strategy



for the development will adopt appropriate forms of sustainable drainage systems to comply with the requirements of the NPPF and London Plan to ensure that post-development surface water flood volumes are managed on-site in a sustainable manner.

It is noted that no objections were raised regarding flooding in the assessment of the previous application (ref. P1103.23).

7.6 ARCHAEOLOGY

Paragraph 200 of the NPPF sets out that where development involves a site which includes, or has the potential to include, heritage assets with archaeological interest, developers are required to submit an appropriate desk-based assessment. This is echoed in the text accompanying Policy 28 of Havering's Local Plan.

The site lies within an Archaeological Priority Zone (APZ) which has been designated due to an enhanced potential for early prehistoric remains in the underlying Black Park Gravels. The application is accompanied by an Archaeological Impact Assessment which concludes that the site exhibits generally low potential for the survival of archaeological remains of all periods. It is noted that the conclusions of this report were accepted during consultation of the previous application (ref. P1103.23) and no objections were raised by relevant consultees.



8 SUMMARY AND CONCLUSION

This Planning Statement has been prepared by SPD Studio on behalf of Shaun Wright in support of an application for Full Planning Permission for the *'demolition of the existing buildings and the construction of 2 storey commercial building with a mezzanine comprising a car showroom at ground floor (sui generis) and office space on first floor and mezzanine level (Use Class E), and associated landscaping and parking'* at 69-71 Butts Green Lane, Hornchurch, RM11 2LD.

The proposal would redevelop an underutilised site in a sustainable location to deliver an uplift in commercial space, within a new high-quality and well-designed building, improving the overall appearance of the site. The Development Plan, together with national policy, strongly advocates for the intensification of sites to achieve the most efficient and effective use of land.

The proposed development has been designed to respond to the existing context and will not result in any detrimental impacts on neighbouring properties, the highway network or the natural environment. The height and massing of the proposed building sits comfortably within the surrounding built context and will be a similar height to the buildings in the surrounding area.

The proposed development is therefore considered to be acceptable in planning terms; acceptable in the context of all relevant policy and material considerations. The proposal will deliver additional commercial floorspace in this designated local centre, to meet the needs of the local and wider area. Paragraph 11 of the NPPF confirms that in the presumption in favour of sustainable development, applications that accord with the development plan are to be approved without delay.



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