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Planning & Heritage Statement

The Breakers, East Preston

December 2020



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Project Name: The Breakers, East Preston

Location The Breakers, 29 Tamarisk Way, East Preston,
BN16 2TE

Client: Mr and Mrs Folland

File Reference: P1744

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1. Introduction

- 1.1. This Planning & Heritage Statement has been produced on behalf of **Mr and Mrs Folland** in support of their Householder planning application for the proposed residential restoration, remodelling and extensions to The Breakers, 29 Tamarisk Way, East Preston, BN16 2TE. The development description for the proposal reads:

'Demolition of part of existing garage and outbuildings. Erection of new 3 bay garage. Extensions and internal and external remodelling of existing dwelling including change from thatch to clay tiled roof.'

- 1.2. It is acknowledged that an application was previously submitted under reference EP/158/19/HH for the part-demolition, alterations and extensions to 'The Breakers' however, following dialogue with Arun District Council, the scheme was withdrawn. This is set out in Section 3 of this Statement.
- 1.3. Since the withdrawal of the previous application, the Applicant has worked proactively with ECE Planning (Planning Consultant) and Smalley & Hales Architects (design by Neil Holland) to create an entirely new scheme.
- 1.4. The applicants and consultant team have engaged proactively with both the Parish Council and East Preston Preservation and Kingston Society in respect of the proposed changes to the property and have received positive support toward our amended proposals.
- 1.5. In summary, the proposals seek to significantly improve the appearance and architectural quality of the existing dwelling 'The Breakers' while enhancing the facilities available to current and future occupants of the property. The proposals are considered to result in an exemplar building which would be a legacy for future generations, contributing positively to the architectural composition of Tamarisk Way and East Preston more generally. It is contended that these improvements to the appearance and architectural quality will enhance the existing property and positively contribute to the street scene as a whole.
- 1.6. It is important for Arun District Council to note the urgency for the roof of 'The Breakers' to change to clay tiles for the reasons as set out in this Statement and the accompanying Fire Risk Assessment. The current thatched roof is a significant safety hazard for the Applicant, the Applicant's family and immediate neighbours.
- 1.7. Additionally, this Statement will cover relevant planning policy and guidance, considering effects of the proposed redevelopment and relationship with existing neighbouring properties.
- 1.8. This application for Householder Planning Permission is supported by the following documents and drawings/plans:
- **Application Form**
 - **CIL Forms**
 - **Biodiversity Checklist**
 - **Validation Checklist**
 - **Existing & Proposed Drawings**
 - **Location & Block Plans**
 - **Planning & Heritage Statement**
 - **Design, Access & Heritage Statement**
 - **Fire Risk Assessment**
 - **Preliminary Roost Assessment Letter**

2. The Site

- 2.1. The property is located within the Willowhayne, which is a private seaside estate on the coast of Rustington/East Preston. East Preston lies between Chichester and Worthing with good commuting links to cities such as Brighton, London, Portsmouth and Southampton by train through Angmering Station, 1.43km from the property.

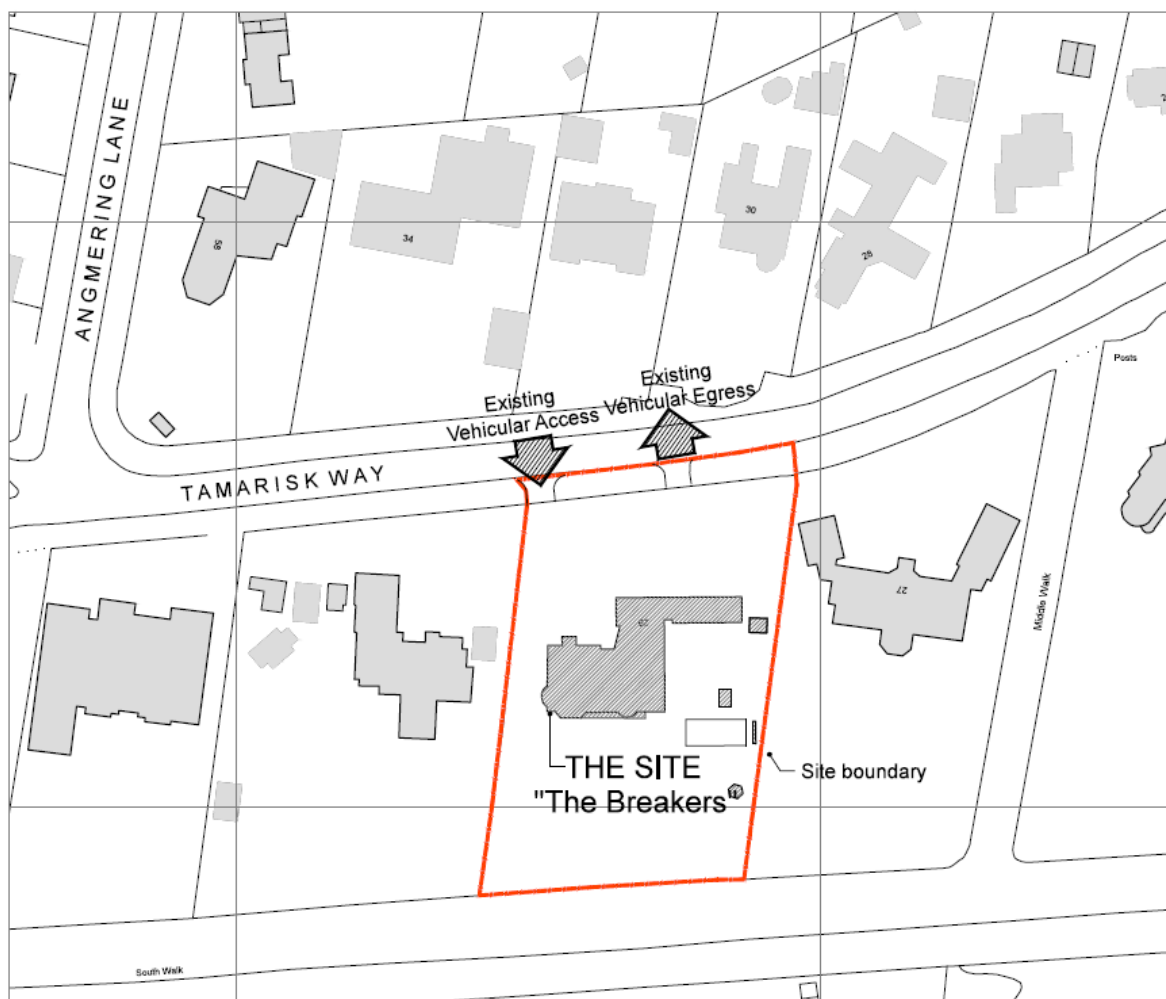


Figure 1 - Existing Location Plan

- 2.2. Tamarisk Way's prevailing characteristic is the generous size of plots and the houses built along it, with all the houses on the southern side being particularly large.
- 2.3. The Breakers is a large, 'Arts and Crafts style', three storey house, which dates back to the 1930s and has a total of 6no. bedrooms. The existing property sits within a substantially sized plot and has a large parking area to the north of the site that has an in-out driveway. Additionally, the existing property has a large garden predominantly to the south of the site, with a private courtyard garden and swimming pool to the east of the dwelling. In total the site area is approximately 0.3ha.
- 2.4. The existing building is not a Listed Building (as identified by Historic England) however the building has been identified as a Locally Listed building within the Council's 'Local List of Non-Designated Heritage Assets'.



Figure 2 - Existing Dwelling at The Breakers (rear elevation)

- 2.5. Arun District Council's Policy Maps (2011-2031) have been reviewed and reveal that the site is within the Built-Up Area Boundary of East Preston. The maps also reveal that the site is not subject to any landscape designations and is not situated within a Conservation Area.
- 2.6. In terms of flood risk, the Government's Flood Maps for Planning have been consulted and reveals that the site is situated within Flood Zone 1 and therefore the land and property have a low probability of flooding. Refer to Figure 3. The Government's Flood Maps for Planning also reveal that the site has a 'very low' extent of flooding from surface water.

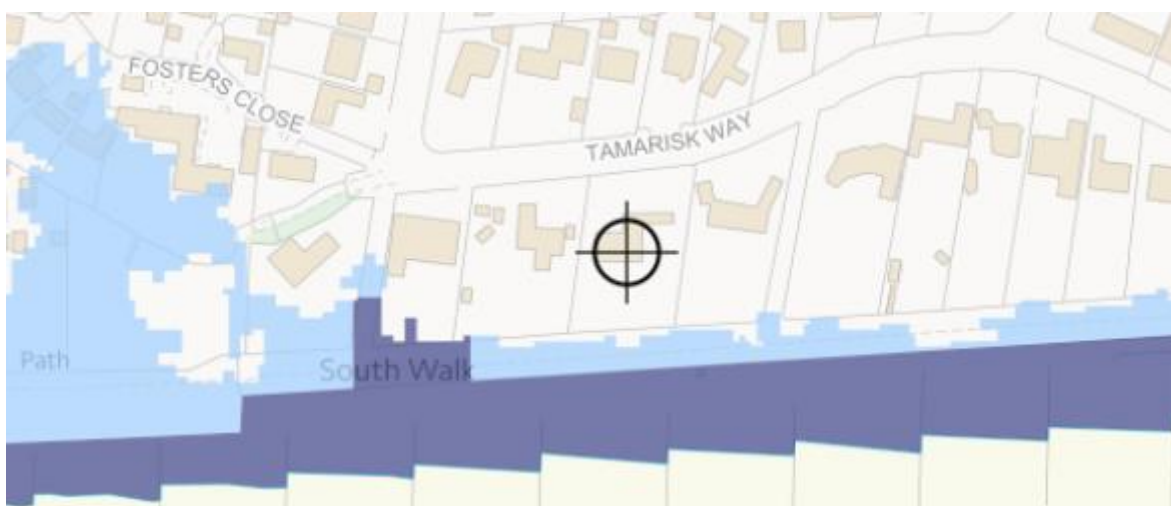


Figure 3 - Government's Flood Maps for Planning

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3. Planning History

3.1. The Breakers Planning History

3.1.1. The Council's online portal has been reviewed and reveals the following planning history. The following has been ordered chronologically with the most recent application being first.

3.1.2. **Reference EP/158/19/HH. Demolition of existing garage & outbuildings. Alterations to external materials (including change from thatch to clay tiled roof and brick/stone to fibre cement weatherboarding and coloured render). Alterations to existing fenestration, including to 2 no. ground floor rear bay windows, and addition of first floor front dormer, enlarged balcony at first floor level at the rear. Replacement garages. Withdrawn 27 February 2020.**

3.1.3. The above application was withdrawn in February 2020 following dialogue with Arun District Council. The withdrawn elevations can be seen in the below Figures.

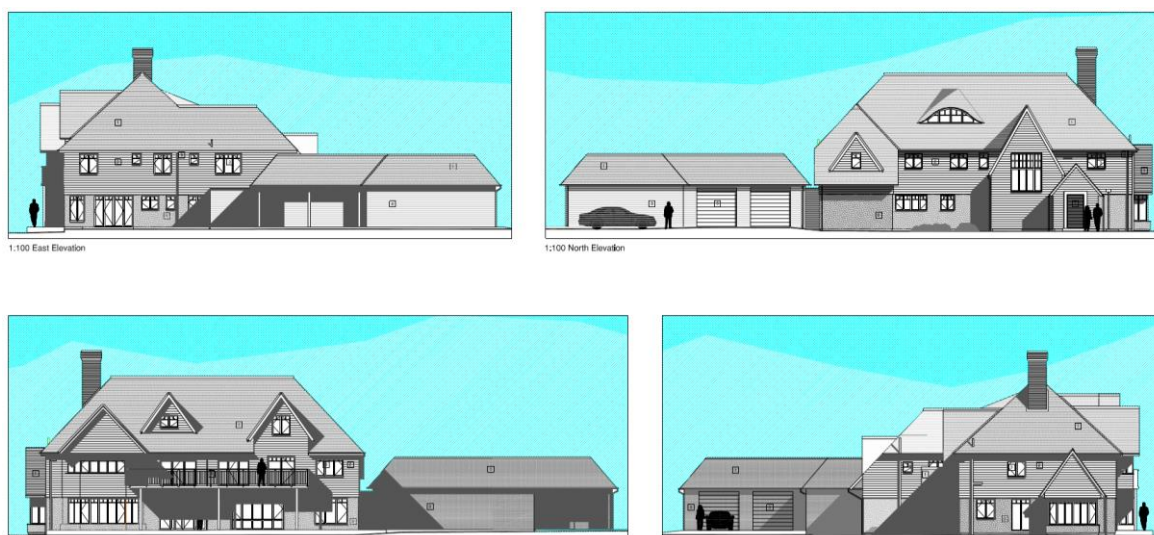


Figure 4 - Withdrawn Elevations Reference EP/158/19/HH

3.1.4. **Reference EP/59/93. Renewal of unimplemented planning permission EP/163/88 for new house. Land between The Breakers & Willowhayne House. Approved 15 October 1993.**

3.1.5. **Reference EP/163/88. Amendments to previously approved Application No. EP/193/87 for 1 dwelling house. Land between The Breakers & Willowhayne House. Approved 12 September 1988.**

3.1.6. **Reference EP/193/87. Erection of 1 detached house. Land between The Breakers & Willowhayne House. Approved 14 December 1987.**

3.1.7. **Reference EP/48/87. Outline application for demolition of existing outbuildings and erection of single detached dwelling. East side of garden to The Breakers. Refused 11 May 1987.**

3.2. Other Relevant Planning History

3.2.1. As Arun District Council will be aware, there are a significant amount of approved precedent applications within the immediate vicinity of the site, on Tamarisk Way and along Coastal Road to Gorse Avenue. The most relevant application situated to the west of the site is detailed below.

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- 3.2.2. **Reference EP/103/16/HH. Remodelling & extensions. Revision of previously approved EP/120/15/HH. Hascombe 33 Tamarisk Way East Preston BN16 2TE. Approved 5 September 2016.**
- 3.2.3. The above application sought permission for the remodelling and extensions to the existing dwelling at 33 Tamarisk Way which is situated two properties away, to the west of The Breakers. See Figure 5 for the approved elevations.
- 3.2.4. It is important to note that the Planning Consultant, concept Architect and contractor who designed and delivered the scheme at Hascombe is the same Team for the current application at The Breakers.



Figure 5 - Approved Elevations at Hascombe 33 Tamarisk Way - Reference EP/103/16/HH

4. The Proposal

- 4.1. This application for Householder Planning Permission, seeks part-demolition, extensions and alterations including replacement of the existing thatch roof at The Breakers, Tamarisk Way, East Preston. The proposal represents a sustainable approach to the reuse of the existing structure. As a result of the proposal being an extension rather than a demolition and rebuild, there will be a decrease in the movement of goods along the quiet private road of Tamarisk Way and also a faster construction, both of which will result in a decreased disturbance to neighbouring properties.
- 4.2. The extensions to the property have been designed sympathetically with regard to the architectural styles of the surrounding properties, particularly those on the southern side of Tamarisk Way and in relation to the existing property itself. The proposed extensions and alterations are considered to result in an exemplar dwelling which would be a legacy for future generations through the careful, high quality architectural approach.
- 4.3. The accompanying Design, Access and Heritage Statement and drawings set out the proposals in detail. A summary of these proposals is set out below:
- Demolition of existing garage and erection of a new 3 bay garage.
 - Remove and replace the existing single storey wing to store a sit on mower tractor and log store with a replacement gardeners toilet.
 - Demolition of existing pool plant building which will be rehoused in the poolroom.
 - Replacement of existing windows.
 - Change the existing combustible thatch roof for a plain clay tiled roof.
 - Proposed adjustment to the access and egress points on the northern boundary.
- 4.4. As set out in further detail in Section 7 of this Statement, the current thatch roof is a significant safety hazard and fire risk to the dwelling and neighbouring properties, being so close to the Greensward and beach where barbecues / bonfires occur frequently. It is therefore proposed that this roof is removed and replaced as a matter of urgency.
- 4.5. The extensions and alterations will result also in a significant improvement to the visual amenity and materiality of the property, utilising a very high-quality palette of local stone and timber to produce the very highest quality development.

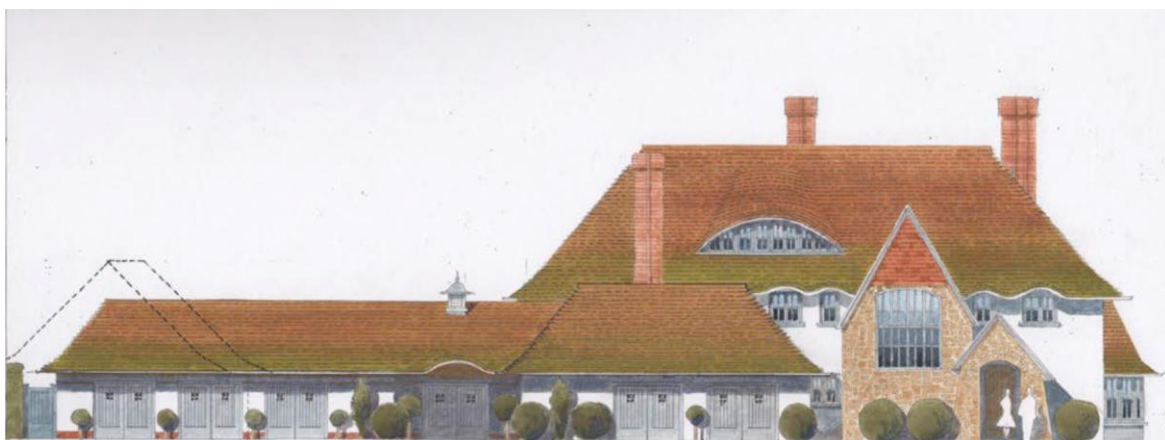


Figure 6 Front Elevation As proposed (new garage shown dashed)

5. Heritage Statement

5.1. Introduction

- 5.1.1. The site is not located within a Conservation Area and does not comprise a Listed building. The building is however recognised as a Locally Listed building (non-designated heritage asset) within the Council's 'Local List of Non-Designated Heritage Assets' document.
- 5.1.2. This Heritage Statement examines the potential impact of the proposed development on this designation and other heritage assets in the area.

5.2. Historical Assessment of The Breakers – Locally Listed Building

- 5.2.1. Please refer to the accompanying Design, Access and Heritage Statement for a historical assessment of The Breakers. Please also refer to Section 7 of this Statement.

6. Policy Overview

6.1. Introduction

- 6.1.1. 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. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.1.2. In this case, the Development Plan consists of the Arun Local Plan (2018) and the East Preston Neighbourhood Plan (2014-2029). The National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and supplementary planning guidance are all material considerations.
- 6.1.3. This section considers how the proposed redevelopment complies with both National and Local Planning Policy.

6.2. National Planning Policy Framework (NPPF)

- 6.2.1. The NPPF was adopted in 2012 with a revised version published in July 2018, and updated in June 2019. At its heart is the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (**paragraph 11**). There are three dimensions to sustainable development: *social, economic and environmental* which is identified at **paragraph 8**.
- 6.2.2. **Section 9** of the NPPF is concerned about ‘promoting sustainable transport’ and states at **paragraph 109** that *‘development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’*. The proposals seek permission for extensions and internal and external remodelling and extensions to an existing dwelling which, once completed, would not result in a significant increase in vehicular movements to and from the site. The residual cumulative impacts on the road network would therefore not be severe and the proposals should therefore not be refused on highway grounds.
- 6.2.3. **Section 11** of the NPPF requires developments to make ‘effective use of land’ and identifies at **paragraph 117** that *‘Planning policies and decisions should promote an 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’*. The proposals are considered to make efficient use of the existing dwelling which sits within a substantially sized plot. The extensions and alterations would improve the living conditions for the current occupiers and therefore the proposals are in accordance with Section 11 of the NPPF.
- 6.2.4. The NPPF provides clear guidance to planning authorities on how to consider design in policy terms, with **Section 12** (Achieving well-designed places) providing the following framework against which to consider design quality. **Paragraph 127** states that *‘planning policies and decisions should ensure that developments:*
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

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b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) 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 users⁴⁶; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

6.2.5. These design related requirements have fully informed the design of the proposed development and it is considered that the proposed extensions/alterations fully respond to the context of the site, providing for a design solution of high architectural quality that considers the built form, natural and conservation context of the surrounding area.

6.2.6. **Paragraph 153** states that *'in determining planning applications, local planning authorities should expect new development to:*

a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and

b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.'

6.2.7. The proposed design offers the chance to improve the efficiency of the building and make it more sustainable by reducing its overall energy consumption and emission of greenhouse gasses. Please refer to the accompanying Design, Access and Heritage Statement for further information.

6.2.8. **Paragraph 155** is concerned about flood risk and states that *'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).'* As previously set out within Section 2 of this Statement, the dwelling and associated land is situated within Flood Zone 1 therefore has a low probability of flooding. It is therefore considered that the proposals are not at risk of flooding.

6.2.9. **Section 16** of the NPPF is concerned about 'conserving and enhancing the historic environment' and states at **paragraph 185** that *'plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

a) 'the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

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- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.'*

- 6.2.10. Although the existing dwelling is not a Listed building and the site is not within a Conservation Area, the building has been identified as a Locally Listed building within the Council's 'Local List of Non-Designated Heritage Assets'. In this regard the existing dwelling is considered to hold some heritage value.
- 6.2.11. The proposals are considered to improve the existing dwelling and will result in a high-quality exemplar dwelling which would be a legacy for future generations. Please refer to the accompanying Design, Access and Heritage Statement for further information.
- 6.2.12. To conclude the proposed extensions and alterations are considered to be in accordance with the relevant paragraphs from the NPPF.

6.3. National Planning Practice Guidance (NPPG)

- 6.3.1. The National Planning Practice Guidance (NPPG) was published by the Government in March 2014 and is updated regularly. The NPPG supplements those overarching objectives of the National Planning Policy Framework. The guidance provided by the NPPG has been fully considered in the creation of this application and the proposed redevelopment is seen to be fully compliant with it.

6.4. Strategic Planning Policy – Arun Local Plan (2018)

- 6.4.1. The Arun Local Plan 2011-2031 was adopted on 18 July 2018 and sets out the vision for the future of Arun and guides development to achieve that vision.
- 6.4.2. The following policies within the Local Plan are considered to be relevant to the application. These are not all explored in detail, however, it is contended that the proposal is consistent with the aims and objectives of these policies and the more up-to-date policy thrust within the National Planning Policy Framework (NPPF):
- Policy SD SP1 (Sustainable Development);
 - Policy SD SP1a (Strategic Approach);
 - Policy SD SP2 (Built-up Area Boundary);
 - Policy H DM1 (Housing Mix);
 - Policy D SP1 (Design);
 - Policy D DM1 (Aspects of Form and Design Quality);
 - Policy D DM2 (Internal Space Standards);
 - Policy D DM4 (Extensions and alterations to existing building (residential and non-residential));
 - Policy ECC SP1 (Adapting to climate change);
 - Policy ECC SP2 (Energy and climate change mitigation);
 - Policy ECC DM1 (Renewable Energy);
 - Policy T DM1 (Sustainable Travel and Public Rights of Way);
 - Policy HER SP1 (The historic environment);
 - Policy HER DM2 (Locally Listed Buildings or Structures of Character);

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- Policy ENV SP1 (Natural Environment);
- Policy ENV DM5 (Development and Biodiversity);
- Policy W DM3 (Sustainable Urban Drainage Systems);
- Policy QE SP1 (Quality of the environment).

6.4.3. To conclude it is considered that the proposals are compliant with those relevant policies from the Arun Local Plan which are explored in further detail in Section 7 of this Statement.

6.5. East Preston Neighbourhood Plan 2014-2029

6.5.1. The East Preston Neighbourhood Plan form part of the Development Plan is a material consideration in the determination of this application and therefore we have considered the relevant policies.

6.5.2. **Policy 1** of the East Preston Neighbourhood Plan states that development proposals will be supported, provided that:

'i. the scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, reflect and enhance the architectural and historic character and scale of the surrounding buildings;

ii. they meet the adopted car parking standards, whereby the amount and method of parking provision should not adversely affect road safety, or result in unacceptable levels of on-road parking demand;

iii. where proposals for the use of a dwelling as a commercial holiday letting would amount to a change of use which requires planning permission they demonstrate that they will not harm the amenities of the local residential area; and

iv. they retain amenity land, incidental open spaces and roadside verges unless Policy 5ii applies.'

6.5.3. It is strongly considered that the proposed extensions and alterations comply fully with Policy 1; the extensions will result in a scale and massing that reflects fully those properties within its locality. In addition, the proposed development will result in the refurbishment and revitalisation of an otherwise dated property, providing an impressive range of facilities for all current and future occupants.

6.5.4. The proposed architectural style and materiality of the proposed development is far more in line with its surroundings than the existing. The proposal will materially enhance the architectural character of the area and will also result in a dwelling of the highest architectural quality which will result in an exemplar dwelling for future generations.

6.5.5. Tamarisk Way is identified on the proposals map as being included in Design and Character Area One, affected by Policy 2. **Policy 2** states that development proposals will be supported provided the scale, density, massing, height, landscape design, layout, materials, including alterations to existing buildings will:

'i. preserve the street scene and avoid any increases in density that would be harmful to the character of the area; and

ii. protect the view from the beach.'

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- 6.5.6. It is considered that the proposed development is fully compliant with these policies; the development will refurbish the building and bring it to the highest quality standard, similar to other buildings on the street whilst preserving the street scene. The proposals are not considered to have an adverse impact on the view from the beach.
- 6.5.7. It is acknowledged within **paragraph 4.25** that *'Large houses can be appropriate in this area, but their scale should be proportionate to the size of their plot. Large houses on small plots are to be avoided. Care should be taken when extending houses to ensure that they remain proportionate to their site.'*
- 6.5.8. It is strongly considered that with the proposed building's scale will be entirely proportionate and appropriate in scale in relation to its surroundings and its substantial plot. The proposals are considered to result in a building entirely suitable to its plot size and neighbours.

6.6. Supplementary Planning Guidance – Emerging Arun District Design Guide

- 6.6.1. Arun District Council are currently in the process of adopting a new Design Guide which is intended to provide further detail to the Design policies of the Arun Local Plan (chapter 13) and to raise the standard of design across the District.
- 6.6.2. The emerging document went out for consultation between 9 January 2020 until 21 February 2020. The SPD was then taken to Planning Policy Sub Committee on 30 June 2020 where it was agreed that the document could progress to a Regulation 12b Public Participation period in accordance with Regulation 35.
- 6.6.3. The Arun Design Guide and final responses raised are being reported to Planning Policy Sub-committee in December 2020 which, if successful, will then progress onto Full Council in January 2021 for adoption.
- 6.6.4. The emerging SPD is therefore in early stages of adoption and is therefore not considered to hold much weight at this time, in the determination of the application. Despite this, the draft guide has been reviewed and considered within the preparation of this application.

6.7. Supplementary Planning Document – Arun Parking Standards

- 6.7.1. Arun District Council adopted a new Parking Standards SPD as a result of West Sussex County Council's new 'Guidance on Parking at New Developments' document (dated January 2020).
- 6.7.2. The Parking Standards SPD relates to the amount of parking, cycle and electric vehicle charging points expected to be provided within development of differing sizes.
- 6.7.3. In this regard the SPD has been considered in the preparation of this application and is discussed in detail within Section 7 of this Statement.

6.8. Arun Community Infrastructure Levy (CIL)

- 6.8.1. Arun District Council (ADC) approved the Arun Community Infrastructure Levy (CIL) Charging Schedule on 15 January 2020 and agreed that it would come into effect on 1 April 2020. This meant that from 1 April, ADC became a CIL Charging Authority and therefore ADC would charge CIL liable developments on a pound (£) per square metre (sqm) basis in accordance with the charges in Table 6.1 of the Arun CIL Charging Schedule.
- 6.8.2. As set out within the Charging Schedule, CIL is applied to most residential and some commercial buildings that people normally use and where more than 100 square metres of floorspace is created.

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- 6.8.3. The site is identified as within Zone 4 where CIL would be charged at £100 per sqm for residential extensions. The proposed extensions would propose over 100sqm of additional floorspace and therefore would trigger CIL.
- 6.8.4. In accordance with Regulations 42A and 42B of The Community Infrastructure Levy (Amendment) Regulations 2014 (as amended), the Applicant has submitted CIL Form 9 to obtain an exemption for the residential extension. The relevant criteria has been reviewed and it is confirmed that the Applicant would fully comply.
- 6.8.5. In this regard, the Applicant would be exempt from paying the CIL charge.

7. Planning Appraisal

7.1. Introduction

7.1.1. The principle issues in relation to this proposal are as follows:

- **Principle of development**
- **Design, Form and Appearance**
- **Heritage**
- **Fire Risk**
- **Access and Parking**
- **Residential Amenity**
- **Biodiversity**

7.1.2. These issues will be considered independently despite being linked to ensure a sustainable form of development.

7.2. Principle of Development

7.2.1. The proposed development for which this application seeks Householder Planning Permission is located in Tamarisk Way and represents a previously developed site which is within the existing built-up area boundary.

7.2.2. The proposals have full regard for the pillars of sustainability as set out in the National Planning Policy Framework and those provisions of paragraph 11 which state that Arun District Council should consider this application under the presumption in favour of sustainable development that is at the heart of the Framework.

7.2.3. As aforementioned in Section 3, Tamarisk Way and neighbouring roads are evolving in its character with many of the dwellings now displaying architecture of a contemporary design and generally improving existing facilities. There is an opportunity to improve the streetscene further through the redevelopment of the existing dwelling to create an exemplar building of the highest architectural quality, as demonstrated by the proposals. Furthermore, the proposals seek to improve living conditions for current and future occupiers by including more facilities to enjoy.

7.2.4. As set out previously and again in Section 7.5, the change in material of the roof is urgent due to the current safety hazard which the thatch roof presents. This is considered to be a material consideration in the determination of the proposals and should be viewed favourably by Arun District Council Planning Officers.

7.2.5. To conclude, it is considered that the proposals are acceptable in principle within planning terms.

7.3. Design, Form and Appearance

7.3.1. The architectural approach that has been adopted within the proposed development consists of a high-quality design that respects fully the Arts and Crafts influences apparent in the current property and allows the proposal to blend with the properties already present on the street. It is considered that the proposed development makes efficient use of the development site while not having an adverse impact on its surroundings.

7.3.2. The changes proposed, include the loss of the existing thatched roof as set out previously, but must be considered in respect of a holistic renovation and enhancement to the existing property.

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- 7.3.3. Due to the quality of architecture proposed and material choices made the proposals are considered to enhance the character of this dwelling and the streetcene more generally. The proposal would introduce handmade clay rooftiles and subtle Arts and Crafts Deco elements to the building, including bespoke timber and stained-glass detailing to reinforce local distinctiveness and enhance the architectural quality and character of the building and area more generally.
- 7.3.4. The proposed new garage, forward of the existing is designed to respect fully the building line of the adjacent property to the east and produce an outbuilding that is entirely complimentary in scale, design and materiality that adds to the rich architectural quality of the dwelling as completed.



Figure 7 West Elevation as proposed, showing the front of the new garage block

- 7.3.5. The proposed development results in a scale of property that is entirely appropriate for the large plot within which it is positioned. Furthermore, the proposed alterations will result in a property that is entirely concordant with neighbouring property scales.



Figure 8 Aerial Image showing plot sizes and forward projecting elements in the streetscene.

- 7.3.6. Overall, the proposed design of the extensions and alterations are considered to significantly enhance the architectural quality of the property and visual amenity of the local area more generally as shown on the image below in Figures 9 and 10.

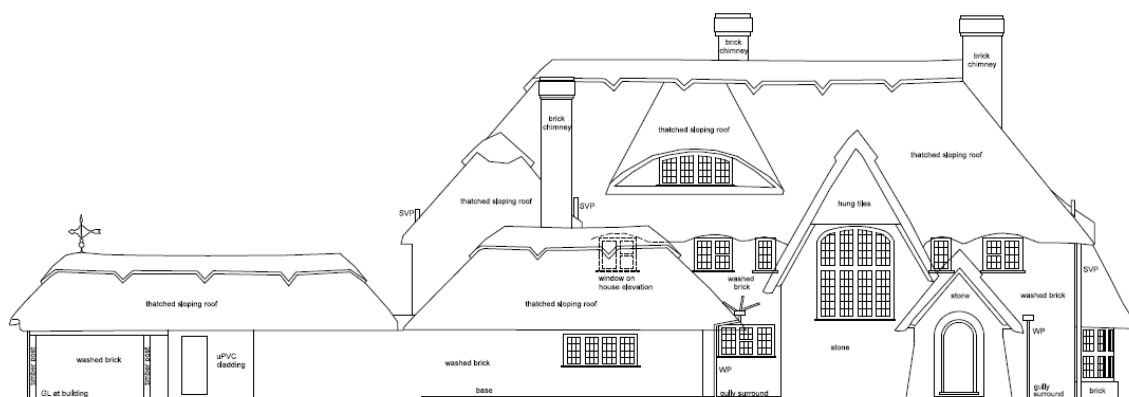


Figure 9 - Existing North Elevation



Figure 10 - Proposed North Elevation

7.3.7. The design fully compliments the surrounding character area and provides for a dwelling of significant architectural quality, to the wider benefit of the immediacy.

7.3.8. Please refer to the accompanying Design, Access and Heritage Statement for further information.

7.4. Heritage

7.4.1. The scheme has been very carefully considered and designed to respect and indeed enhance the character and appearance of the existing, non-designated heritage asset. The design of the proposed dwelling, including materials used, architectural features and scale has been carefully studied as set out within the following paragraphs and accompanying Design, Access and Heritage Statement.

7.4.2. Section 16 of the NPPF is concerned about 'conserving and enhancing the historic environment' and states at paragraph 185 that '*plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.*'

7.4.3. As set out within the accompanying Design, Access and Heritage Statement, the existing dwelling is at risk of decay and the building is not currently in the greatest of conditions, for example, the windows and fitment of the windows allow water to penetrate the external fabric and unless tended to will be to the detriment of a future heritage asset.

7.4.4. In addition, the house is incredibly thermally inefficient. The proposals therefore seek to enhance the existing non-designated heritage asset through the replacement of the windows for a more thermally efficient product and also the addition of wall insulation internally.

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- 7.4.5. The proposals have therefore taken account of the requirement to sustain and enhance the significance of the heritage asset, in accordance with local and national planning policy.
- 7.4.6. The proposals would clearly make a positive contribution toward local character and distinctiveness which has been demonstrated through a considered and high-quality design and detailing producing an architectural legacy for future generations.
- 7.4.7. The proposed change in roofing material, whilst changing the character of the building will provide long term protection to the asset, removing the threat of fire damage and destruction of the overall asset that will be removed by the tile roof solution. The overall package of works are considered to produce a property of significant architectural quality that fully justify the removal of such fabric and have been supported by the Parish Council and East Preston and Kingston Preservation Society, following presentations in October 2020.
- 7.4.8. Please refer to the accompanying Design, Access and Heritage Statement for further information.

7.5. Fire Risk

- 7.5.1. As set out previously, it is imperative for Arun District Council to note the urgency for the roof of 'The Breakers' to change to clay tiles. The current thatched roof is a significant safety hazard for the Applicant, the Applicant's family and immediate neighbours. The application is therefore supported by a Fire Risk Assessment which has been prepared by Fire Safety Sussex.
- 7.5.2. The accompanying Assessment should be considered within its own merit in the determination of this application. In summary, the Assessment concludes the following:

'This is a domestic dwelling.

The risk assessment has determined that the single biggest risk to the property becoming involved in fire is in relation to its thatch roof construction. A situation made worst by constraints outside of the owner's control.

Such a fire is likely to have developed beyond initial stages before it is spotted typically many thatched fires are not seen and the alarm raised within the first 30 minutes. Under controlled conditions the fire spread in thatch roofs is normally at 4 metres per hour in each direction.

At East Preston, strong offshore breezes are common and winds that increase in speed carry fire brands and embers from BBQs and any other beach fires; these would also affect (increase) the speed of fire spread. In particular; access to the property from the entrance (width of drive), south (rear) and access at each side of the property would also hamper the fire service.

BBQs are not the only source of ignition, Fire works (not just November, Christmas and new year, but sometimes Birthday celebrations), Chinese Lanterns and bonfires all increase the risk factors. The house that stood opposite was already raised to the ground.

The risk of fire is moderate, this increases to high at certain times of the year, but the consequences are far reaching.'

- 7.5.3. In this regard, the report clearly identifies the fact that if the thatch were to catch fire, it would not be salvageable, based on access times from local fire stations, which would destroy both this element of the current property as well as placing other neighbouring homes at significant risk of fire from the sections of thatch that would detach from the roof in the event of a fire and be carried with the prevailing wind.

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- 7.5.4. It is therefore concluded that the change of material to clay tiles would present the only solution to future-proofing the dwelling and ensuring that a fire is not easily possible. The change in material would protect not only the existing occupants but would also protect neighbouring dwellings within the immediate vicinity. This is considered to be a significant and material consideration in the determination of this application.

7.6. Access and Parking

- 7.6.1. The proposed development is considered to be located in a sustainable area, owing its transport connectivity to East Preston, Rustington, Ferring and the wider area; as well as its close proximity to key local services.
- 7.6.2. The proposal will provide a total of 3no. car parking spaces; this is in line with Arun County Council's Parking Standards (January 2020) and East Preston Neighbourhood Plan Policy 1. The parking spaces will be located within the new proposed 3 bay garage located at the front of the property on the private driveway. Cycle storage will also be located within the new garage.
- 7.6.3. The application proposes to slightly widen the existing openings by retaining the two far west and far eastern stone piers and reconstructing respective stone piers which match and correlate with the existing piers and the smaller pier tops. The piers will be similar to the existing but will be situated at a distance of 3.8m apart.

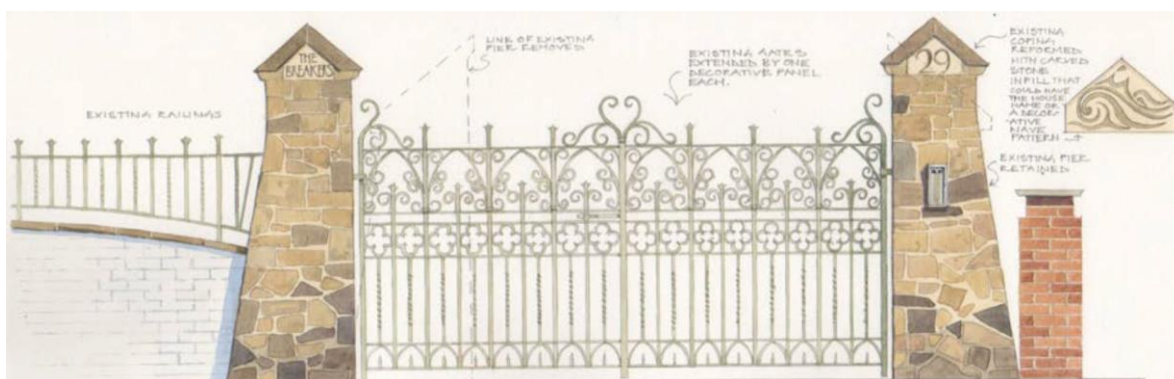


Figure 11 Newly arranged gate piers

- 7.6.4. This approach is proposed to make the access and egress safer and would even be wide enough to allow a fire appliance to tend to the property if necessary. In terms of visibility, this would be as existing.
- 7.6.5. To conclude, the proposals are considered to be acceptable in terms of access and parking, maintain also the character and appearance of the property and streetscene more widely.
- ## 7.7. Residential Amenity
- 7.7.1. As set out previously the proposed extensions and alterations are not considered to have any adverse impact on the amenity of neighbouring occupiers. The extensions have been designed to prevent undue overlooking, without introducing any new window positions on the principal east or west elevations at first floor.

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- 7.7.2. Furthermore, although the balcony on the southern elevation will be removed and replaced by a slightly deeper balcony (but not any longer), the principle of a balcony on the southern elevation has already been established. It is important to note that the existing balcony is in a poor condition and is becoming slightly structurally unsound. The proposed balcony will be influenced by the art deco vision for the dwelling with curved edges and is not considered to have a detrimental impact on neighbouring dwellings.

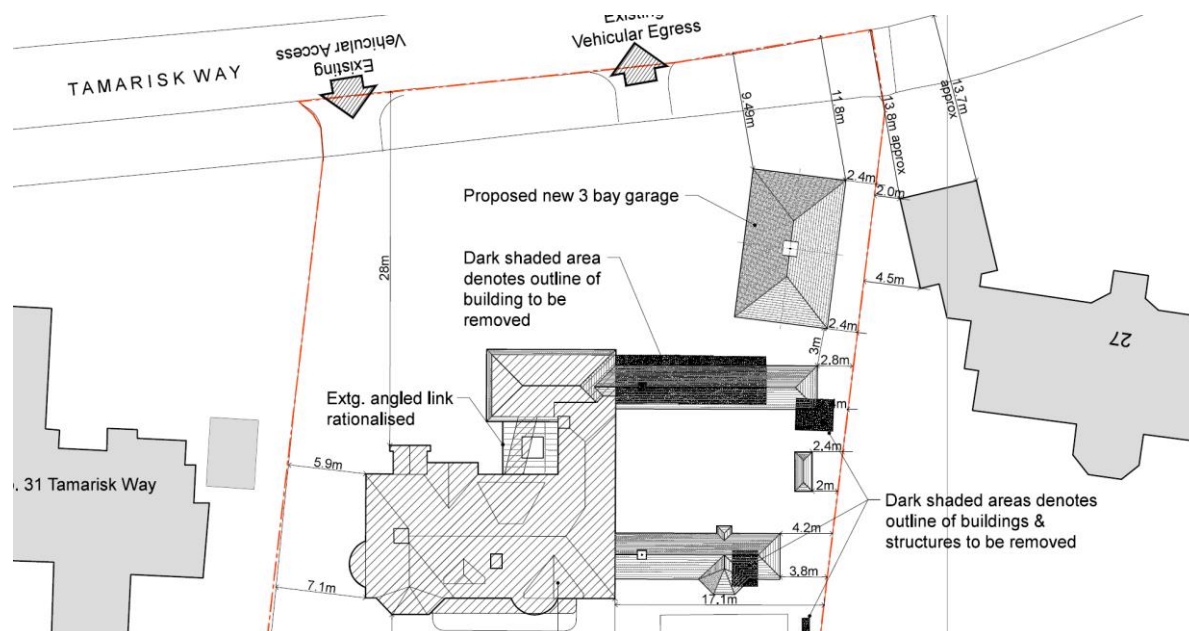


Figure 12 Site Plan as proposed

- 7.7.3. The retention of the open areas to the east of the main dwelling also protect fully the outlook and prospect from the adjoining property, maintaining significant separation from the boundary to the new single storey outbuildings.
- 7.7.4. The garage, forward of the house, addresses the street in a similar way to the neighbouring property immediately east of the site, presenting an acceptable relationship to this structure and its associated function.
- 7.7.5. In relation to any potential overshadowing the extensions would be single storey and therefore are not considered to have any adverse impact on either the neighbouring dwelling to the east or indeed its external amenity space. For the avoidance of doubt, no extensions are proposed to the western elevation therefore there would not be any adverse impact on the neighbouring dwelling to the west.
- 7.7.6. Overall, the proposed development is considered to result in no adverse impact on residential amenity.

7.8. Biodiversity

- 7.8.1. The application is supported by a Preliminary Roost Assessment Letter which has been prepared by Arbtech.
- 7.8.2. Policy ENV SP1 of the Arun Local Plan (2018) states that '*Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment through the development process*'. Policy ENV DM5 then goes on to state that '*development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site*'.

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7.8.3. The accompanying Assessment identifies that, overall, the main dwelling is considered to have moderate habitat value for crevice dwelling bats. In terms of high conservation value roost, it is considered that it is unlikely that the dwelling could support these due to the dwelling's features.

7.8.4. Arbtech conclude within their Assessment that:

'Due to the low risk of the development, it is considered suitable here to take a precautionary approach. To delay an application until summer 2021 by having to wait for a single dusk emergence survey to be carried out on a single building categorised as 'low roost suitability' is considered disproportionate to the risk of harm to bats. Instead, the roof works must be carried out when bats are unlikely to be present: restricted to the period of October-April, and must be supervised by a suitably qualified and bat licensed ecologist. This approach would prevent any disturbance of bats in potential roost sites under hanging tiles, and reduce risk to a degree small enough to be considered proportionate. The ecologist will check all suitable roosting areas under the eaves and in the loft voids using a torch and endoscope immediately prior to roof removal. If any bats or evidence of recent bat use is found then the work will need to cease until a full suite of emergence and re-entry surveys has been carried out and an EPSM licence obtained where necessary.'

The above methodology can be secured through a suitably worded planning condition such as 'The roof works will be carried out as per the recommendations in the Arbtech report dated December 2020. The works will be supervised by a suitably qualified and bat licenced ecologist, and if any evidence of bats is found then work must stop and a full suite of bat emergence and re-entry surveys will be carried out, and a European protected species licence will be obtained from Natural England before the works can continue. A record of the works and any bat evidence found will be kept by the ecologist and will be submitted to the council for approval prior to occupation.'

7.8.5. It is therefore considered that the proposals would not result in detrimental impact to biodiversity and would be in accordance with local and national planning policies, subject to compliance with appropriately worded conditions.

8. Conclusions

- 8.1. The proposed part-demolition, extensions and alterations to The Breakers are considered to provide for the highest quality architectural solution that enhances the appearance of the building while preserving and maintaining the special character of the locally listed building. The extensions will provide extra facilities suitable for the current and future needs of the owners of the property.
- 8.2. The extensions have been designed to blend sympathetically with their surroundings, visually integrating with the street scene and enhancing the visual amenity of the area more generally through the highest quality architecture and use of natural materials. The extensions have been designed to be subservient to the main dwelling, consistent fully with policies of the Development Plan, including the East Preston Neighbourhood Plan.
- 8.3. The change to material of the existing thatch roof is vital in the determination of these proposals as the current thatch presents a significant safety risk to the existing occupiers and immediate neighbours. The change of material to clay tiles is entirely sympathetic to the immediacy and will remove the current significant fire risk to the property.
- 8.4. The proposal is not considered to have any adverse impacts on its surroundings or neighbouring properties. Privacy will be retained, with no further windows introduced from existing to the east and west at first floor.
- 8.5. In summary we consider that the alterations and extensions to the existing building will result in a significant enhancement to the overall composition of the property consistent with the aims and objectives of the Development Plan resulting in the production of an architectural legacy for future generations.
- 8.6. We therefore trust you will be able to support our proposals and approve this planning application.