

## **Objection to planning application ref. FP/134/25/HH**

We have owned 1 Coastguard Cottages since March 2025. This property had been unoccupied or rented out since the death of the previous owner in 2022 and was much neglected. We have carried out a complete renovation, including clearing the garden and removing trees to front and rear. All remaining original features have been retained.

Our objections to this proposal fall under the following headings:

1. Scaling, overlooking and light pollution from the upper floor.
2. Contravention of Nationally Described Space Standards.
3. Digging down: risk of subsidence and function of drains and water supply.
4. Inappropriateness of the design in an area of architectural and historic interest.
5. Inappropriateness of an annexe in the setting
6. Vehicle access
7. Inadequate regard to ecology and the environment.

Our detailed objections are as follows:

### **1. Scaling, overlooking and light pollution from the upper floor.**

The Design and Access Statement says that “the proposals are minor in scale replacing a single garage with a slightly larger garden building / annex / storage”. This is contrived. The proposal is not, primarily, a garden building or a storage unit. It contains three rooms (or four if the storage area were to be converted at a later date). The designation of these rooms is not identified in the plans, but each is big enough for a double bed. There is also a toilet and shower. The proposal is not “slightly larger than” the existing garage but more than three times the size.

We note the reduction in height in comparison with Application ref. FP 40-25 HH. However, height is only one component of scale. The Local Plan states that “Scale covers a number of areas, including: the height, width and length of a building or buildings in relation to its surroundings; the size of parts of a building or its details, particularly in relation to the size of a person; and the combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces i.e. its massing” (p153). The scale of this proposal, particularly its footprint in relation to plot size, is inappropriate and would greatly reduce space between buildings.

The proposed development would encroach on neighbouring properties. The Arun Design Guide SPD 2024 states that the side and rear of two neighbouring properties must be at least 14m apart. The proposed development would be considerably closer than this to Eaves and Nos. 1 and 2 Coastguards Cottages. The edge of the proposed building would be 1m, 5m and 7m from our garden, conservatory and rear wall respectively.

The Design and Access Statement says that “the main garden will not be impacted and remain as is. The small lawn to the side of the garage will be reduced in size.” The main garden is irrelevant to the proposal, since it is attached to The Watch House. The lawn to

the side of the garage will be removed altogether. The grass strip separating the rear of the present building from the boundary will be less than 1m wide.

The Local Plan states that development should “Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook ...” (p156; Policy D DM1). The Design and Access Statement says that “the height of the proposals now preclude the inclusion of windows to the first floor”. The Roof Plan shows three Velux-type windows in the roof, all facing east over our property. As in the previous application (ref. FP 40-25 HH), we object to being overlooked when the Velux windows are opened. These would provide a clear view into our garden, conservatory and two bedrooms from a distance of 2m, 6m and 8m respectively. There would also be significant light pollution.

The tree shown on the architect’s Street Scene and in photographs no longer exists. It was removed in May 2025 in order to maximise light in our house and garden.

## 2. Contravention of Nationally Described Space Standards.

The proposal is in breach of the Nationally Described Space Standards (2015) (NDSS) in relation to external space. The Arun District Council Local Plan states that “planning applications will be expected to have regard to these when submitting proposals for development to include adequate provision of private external space” (p158). There is no usable external space to east or west because the proposal reaches or is less than 30cm from the boundary. The southern edge of the proposal follows the line of an existing driveway. The northern edge is less than one metre from the boundary, and this area can be accessed only by climbing out of a window. In the absence of permission for access from adjoining land, maintenance of the grassed area and ecological additions would therefore be quite impossible.

Nor, despite its excessive footprint in relation to the plot, does the development meet Nationally Described Space Standards in relation to its internal space. Unlike the previous application, the proposal is unclear about the use of rooms 1,2 and 3, but each room is large enough for a double bed. This would allow for two bedroom, 4-person accommodation, which the NDSS state requires 79 sq. m of habitable area. The proposal measures, in the two storeys combined, only 68sq. m., or 77 sq. m. if the storage area is included.

## 3. Digging down: risk of subsidence and function of drains and water supply.

Plans show that the floor of the proposed lower level would be 1.2m below surface level. British Standards require an additional 1m for foundations, making 2.2m in total. Excavation would therefore amount to approximately 87m<sup>3</sup> of soil weighing around 165 tonnes at the average weight for packed soil.

It is likely that the disruption of such an operation will not be considered by the Planning Department, but we would like to make the point in any case. Disruption would include many lorry loads of soil, blocked access to Coastguard Cottages (front and rear) and probable closure of the rear path which is shared by 15 properties.

More seriously, we are concerned about the risk of subsidence to the shared path over time, to the fencing to Coastguard Cottages and potentially their paving, conservatories and rear walls. This risk would also affect Eaves.

In addition, water supply pipes and drainage run under this path, and there is a significant risk of damage in either the immediate future or the long term, all the more so given the probable age of this infrastructure.

#### 4. Inappropriateness of the design in an area of architectural and historic interest.

An objective of the Neighbourhood Plan 2019-31 is to “value, protect and promote the unique parish of Felpham, by respecting its heritage, appreciating its current community and being aspirational when planning its future”. (p.14). The Arun District Council Local Plan states that “designated heritage assets including locally listed heritage assets (Buildings or Structures of Character and Areas of Character) and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment; development likely to prejudice any of the above, including their settings, will be refused” (p.190).

In addition, “any works carried out should preserve or enhance the building and any features of architectural or historic interest retained and appropriate materials used”(p195). We would argue that this principle should also be applied to the impact on locally listed buildings by work on other properties.

The Arun District Council Local Plan states that “the successful introduction of new buildings into established townscapes and landscapes relies on the use of materials, high standards of workmanship, detailing and limits on scale and massing ensuring that ‘new’ buildings are harmonious with their surroundings” (p151). The proposed development is no less out of kilter with Coastguard Cottages, The Watch House and Corner Cottage than ref. FP 40-25 HH, all the more so given its close proximity to its boundaries. The Design and Access Statement says that “the proposals will be clad in timber to echo the materials of ancillary coastal residential outbuildings in the area”. We see a contradiction between, on the one hand, the claim that the development is a residential annexe and, on the other, that its status as an ancillary outbuilding means that residential standards of design do not need to be applied. The designation of the proposal seems to shift to suit the arguments. We further believe that timber cladding would be visually unattractive and not in keeping with the neighbouring locally listed buildings.

#### 5. Inappropriateness of an annexe in the setting

This proposed building should not be regarded or treated as an annexe to the Watch House, the owner of which lives elsewhere. We gather that in the case of an application to build an annexe, planning permission is considered by an individual council officer rather than in committee. We would respectfully request that the nature of this proposal is such that it should be considered by committee.

The Watch House has 5 bedrooms. The centre point of the proposed development is closer to 1 Coastguard Cottages, 2 Coastguard Cottages and Eaves, the property immediately to the north-west, than it is to The Watch House. The proposed development has its own vehicular access from Old Coastguards Lane.

The proposal does not therefore meet any reasonable definition of an annexe to an existing property. We note the letter of support from Mr Wright of the National Annexe Planning Consultancy, which is based in Cirencester, more than 100 miles from Felpham. We cannot accept that this organisation has a legitimate interest in planning in Felpham.

The intended use of the proposed development is unclear; we would have no certainty that the storage area, which is the largest room in the proposal, would not eventually be used as further accommodation. Even if it were not, there is insufficient parking for additional visitors.

6. Vehicle access.

Further vehicular access (should, for example, the property be rented out) would overcrowd the access to properties on Old Coastguards and Coastguard Cottages.

7. Inadequate regard to ecology and the environment.

The ecological plan includes a small number of passion flowers, some honeysuckle, a small bird box and an insect box. Together these do not come close to replacing the food sources and carbon absorption which will be lost by the removal of a sizeable grassed area and 165 tonnes of soil. The small lawn to the side of the garage will not be “significantly reduced in size”: it will be removed entirely.

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Would the Planning Department please give serious consideration to these objections. In summary, we are objecting to the development in its entirety on the grounds of:

- Impact on residents of neighbouring properties through inappropriate scaling, overlooking, light pollution and traffic;
- Contravention of NDSS;
- Inappropriateness of design;
- Inappropriateness of an annexe and doubts as to the long term use of the proposed building;
- Risks to neighbouring properties and infrastructure;
- Removal of a grassed area.

Yours,  
Michael and Caroline Reeves  
1 Coastguard Cottages

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[REDACTED]  
**Sent:** 14 October 2025 13:46  
**To:** Rhiannon Lloyd <[Rhiannon.Lloyd@arun.gov.uk](mailto:Rhiannon.Lloyd@arun.gov.uk)>  
**Subject:** Objection to planning application ref. FP/134/25/HH

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Dear Ms Lloyd,

Please see attached objections to this planning application.

Regards,  
Michael Reeves