

Zac Denton
Planning Dept
Arun District Council
Arun Civic Centre
Maltravers Rd
Littlehampton
BN17 SLF
3rd June 2019

Dear Mr Denton

Re: Planning Application Ref: K/9/19/HH, Kingston Corner, Brookside Rd, Kingston Gorse, BN16 1SE.

I write to you to submit a further response to objections to above planning application.

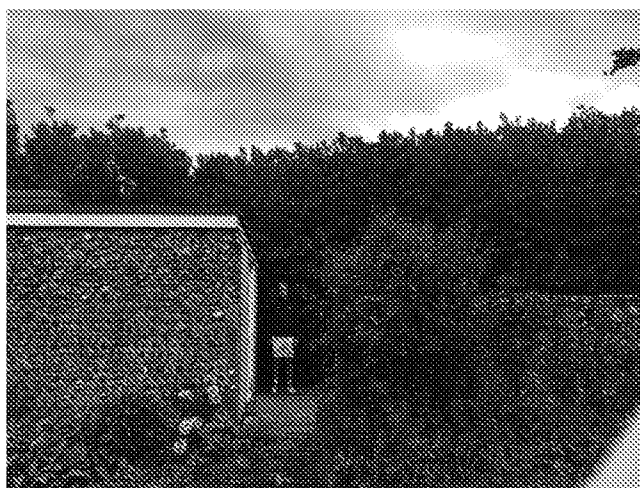
Each of the objections published on the Council website contain the same 3 points: the visibility, the size and the architectural suitability of the proposal in the setting of the Grade-II listed Sea Barn nearby.

No special Design Policy applicable to Kingston Corner:

Firstly, I would like to register the point that there are no special design policies applicable to the site at Kingston Corner. Kingston Corner is not a Listed Building and is not in a Conservation Area or an AONB. Furthermore, there are currently numerous contemporary developments taking place in all parts of Kingston Gorse and West Kingston, and planning applications granted recently which allow permission to develop, which offer much less architectural quality than the designs proposed here. This is important because, if we had sited the proposed building very slightly differently – bringing the building back behind the perceived front building line – we wouldn't even require planning consent. We have proposed it as it is because we feel that the building sits better beside the original house in its currently proposed configuration but, if need be, we can amend it to eliminate the need for planning consent.

Visibility of the building from Sea Barn and Brookside Road:

I wrote to you on 15.5.19 responding to the objection that the proposed building would be visible from the Sea Barn and Brookside Road. The hedge, at its lowest point alongside the proposed building, measures c.4.5m high and is thick enough all-year round to completely conceal it from the view from Sea Barn. Similarly, the flint walls and dense vegetation will largely conceal the building from view from the Brookside Road. I attach photos below, as before, to illustrate this.



photograph of the existing 1970s studio building and its walled enclosure, the 4.5m tall hedgerow (1.90m tall adult included for scale) and Sea Barn 9m beyond the hedge

The setting of the Historic Asset:

In light of the objections relating to the appropriateness of the proposed new building in the setting of the Sea Barn, I approached Historic England directly for their advice on designing new buildings in the setting of a Historic Asset. On the basis of that consultation, I am certain that this building will be beneficial to its setting, and that of the nearby Grade-II listed Sea Barn.

Firstly, it is not necessarily true; that the location of the proposed building is to be considered in the setting of the Sea Barn. The proposed building is on the neighbouring plot; not Sea Barn's demise, and a distance of some 9 metres separates them and therefore there is no functional link joining them. Furthermore, as mentioned above, there is no visual connection between the two buildings; the dense boundary planting between the buildings (see above photos) means that they cannot be seen from each other. This proposal is not necessarily to be considered in the setting of the Sea Barn.

The specific advice that Duncan McCallum of Historic England sent to me, following our discussions, reads as follows (DM's highlighting):

"Our placemaking pages are at <https://historicengland.org.uk/advice/planning/place-making-and-design/> which refers to the Building in Context website which itself relates back to this document: <https://www.designcouncil.org.uk/sites/default/files/asset/document/building-in-context-new-development-in-historic-areas.pdf>

The National Planning Policy Framework says:

127. 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; 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 39 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.

131. In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

The relevant policy in the heritage section is

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

There are no design-specific policies relating to the heritage so in this case it is about how the significance of the listed building will, or will not, be affected by the proposal. If there is any local design policy (which sounds unlikely in this case) then that is likely to be relevant. There may also be some material in the Planning Practice Guidance which is linked to the NPPF – it is currently part way through being updated in the light of the 2018/19 version of the NPPF so I'm not sure if the new design section is out yet, but it will not be prescriptive in terms of design style. In short, design style is subjective and Govt do not see it as their job to intervene – they are, however, interested in design quality, sustainability and so on. Context for a listed building is important but it doesn't mean that new development should match old buildings. Proposals on adjacent sites that genuinely make a listed building less viable are not likely to be acceptable."

The above is well summarised by Historic England's stated advice: to approve good quality, innovative architecture in the setting of historic assets.

The core principal behind the building that we have designed as an extension for Kingston Corner is to be innovative, whilst retaining a very firm grounding in its locale: it does not attempt to replicate the architecture of the house at Kingston Corner, or that of the adjacent Sea Barn. Indeed, as set out in the Design and Access Statement, we visited every building on the Kingston Gorse and West Kingston Estates and we found that the variety of architectures was so wide that it is really impossible to identify a single, definitive, local architecture. The objective to this building is, instead, to source its shapes, size and materials from its vernacular surroundings: the bathing huts on the beach, the hulls of wooden boats of the near shore, the ships out to sea; the flint stones of the beach and the walls of the site. The building is dug into the grass, and the indigenous vegetation is drawn in the gaps in between its fingers, in the way that an object on the beach digs itself into the stones with the action of the waves. This is a new architecture that is absolutely connected to its setting.

The building methods are also innovative and sustainable: the entire structure of the building is to be pre-fabricated, in British workshops, from laminated softwood timber, from verified sustainable sources. The levels of airtightness of the building will be far above those achievable by traditional building techniques.

The shell of the proposed building is uninterrupted – there are no junctions between roof and walls. This allows us to specify a thick layer of thick reflective insulation to be fitted beneath the cladding, without awkward leaky junctions, ensuring that the building will require very little heating in winter; cooling in summer. The ability to open the building from end-to-end will conduct large quantities of fresh air through it, which will further cool it in summer.

The planting around the building will be dense and indigenous. The plants will grow to conceal parts of the building in its setting and provide it with shade from the sun, during the hot months of the year, and wind during the cold months.

The size of the building:

The proportion of the proposed building to the building it replaces is, in planning terms, not a factor to be considered. Kingston Corner is not in the Green Belt and there is no policy test of proportionality that must be considered. Rather, this is a large plot and once the application has been there would remain plenty of space around the buildings, in keeping with the surrounding pattern of development.

The proposed building plan measures 196 sq.m and is set in a plot measuring 5,047 sq.m, so the developed area constitutes only 3.8% of the site. This is an acceptable proportion.

We believe that the proposed building will be a genuinely positive intervention in its context and Historic England indicate their agreement. We trust that this application will be granted planning consent.

Yours sincerely

NICO WARR RIBA