

TOWN & COUNTRY PLANNING ACT 1990

WELLESLEY COURT, FITZALAN ROAD, LITTLEHAMPTON BN17 5JW

**TWO STOREY SIDE EXTENSION AND DETACHED, TWO-STOREY
BUILDING TO NORTH OF EXISTING HOUSE, TO CREATE 4 NO. 3-BED
DWELLINGS**



PLANNING DESIGN & ACCESS STATEMENT v.1

16 May 2022

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1. SITE AND SURROUNDING AREA

- 1.1 Wellesley Court is comprises a late Victorian, large, detached house situated on the corner of Fitzalan Road and Irvine Road in Littlehampton. At the rear (north) the property backs onto Selbourne Road.
- 1.2 The house and its curtilage extend to 2,054sqm in total.
- 1.3 Originally built in the late c19 (1882 – 1898) the building is now converted into ten flats, with accommodation over the ground and first floors and in the roofspace. The property retains a large lawned garden on the Irvine Road frontage to the south. To the rear, the outside area is laid to gravel and used for bins and car parking.
- 1.4 Two blocks of lock up garages, one with five garages and one with ten, have been built within the curtilage of the property, on the north side backing onto Selbourne Road.
- 1.5 The house has been extended on its northern and eastern sides with later, single storey additions. The plan form of the original building is L-shaped with the principal frontage and main entrance facing Fitzalan Road to the east.
- 1.6 The property retains its original flint and brick boundary walls on all four sides, along each road front and the boundary with 3 Irvine Road to the east. A vehicle access is located on the north boundary off Selbourne Road.
- 1.7 The surrounding area is residential in character, and comprises semi-detached Victorian properties of similar age to the east along Irvine Road, set back behind deep front gardens. To the west on the opposite side of Fitzalan Road is a modern, three storey, residential nursing home 'Oakland Court'. On the north side of Selbourne Road is an open area with trees, and further north along Fitzalan Road a low rise block of flats and two storey, semi-detached Edwardian houses.
- 1.8 The site is situated in the Littlehampton Seafront Conservation Area (CA). Wellesley Court is not statutorily Listed or Locally Listed. However, it is considered by Arun District Council to be a building of architectural merit.
- 1.9 The site is in a highly sustainable location, within walking distance of local shops and community facilities, and 600m from the town centre and 900m from Littlehampton railway station. The nearest bus stops are opposite the site on Fitzalan Road and 150 metres to the south on the B2140 South Terrace. This makes it sustainable in terms of its accessibility.

- 1.10 There is a single entry for Wellesley Court on the Council applications database: LU/72/91, for outline application for the erection of 3no. 3-bed houses with parking. The application was withdrawn prior to determination.

2. PROPOSED DEVELOPMENT

- 2.1 The application proposes four new dwellings at Wellesley Court. This would be achieved with a new building comprising three townhouses on the north side of existing house, and an extension to its east wing to form a new dwelling, with associated parking, bin store and cycle shelter.
- 2.2 The two garage blocks on the northern courtyard would be demolished to accommodate the proposals. A lean-to extension, c. 1912-1938 on the rear (north) elevation of the west wing, would also be demolished to accommodate the new building to the north – Figure 13. The small outrigger on the eastern flank of the southern wing will also be demolished – Figure 14.
- 2.3 The southern wing would be extended in its eastern side with a two-storey addition, 6.0m wide by 7.4m deep. It would replicate the south facing facade of the building, essentially adding two additional bays to this wing. Small dormers in the north and south roof slopes provide light to the uppermost bedroom.
- 2.4 All four dwellings are required to have ground floor slab levels at 3.51m AOD, to mitigate against future flood events – see Proposed Sections by Krona Design KD.1041_A.301. Ramps are provided to all four dwellings to meet Part M building regulations on disabled access. For the east wing dwelling, this entails an external ramp along the west and south elevation. This will provide level access to the new dwelling and the existing flats in the southern wing of Wellesley Court. Steps with curved balustrade provides access to the lawned garden. See KD.1041_A.101 D by Krona Design
- 2.5 To the north, a detached, two storey building comprising a terrace of three townhouses is proposed. The building would be 13.1m in length by 10.0m deep, and 11.4m high to ridge. It would be stepped down from the main building by 1.3m. The principal frontage would face Fitzalan Road. The building would have a central projecting gable, replicating the gable on the west elevation of Wellesley Court, with two small dormers windows either side. On the east elevation each house would have a small patio garden, separated from the communal areas of the curtilage by railings on brick plinths.
- 2.6 The disabled ramp would be located on the northern elevation, and provide level access to the front, west side of the new building – see KD.1041_A.101 D by Krona Design.
- 2.7 The development will provide four, three-bedroomed houses. All four units are five person dwellings.

2.8 The schedule of accommodation is as follows:

Unit 1, East Wing:

- GF: Entrance lobby, kitchen / dining 10.8sqm, living room 23.6sqm, WC
- FF: Bedroom 2: 14.9sqm (double), Bedroom 3 12.3sqm (double) + bathroom
- SF: Bedroom 1: 23.8sqm with 19.9sqm >1800mm head height (double) with en-suite

North Block:

Units 2 and 4:

- GF: 23.2sqm kitchen / dining room, lobby, WC and storage space
- FF: Bedroom 1: 7.7sqm (single), Bedroom 2 15.6sqm (double), bathroom
- SF: Bedroom 3: 19.6sqm (double), with en-suite

Unit 3:

- GF: 27.6sqm kitchen / dining room, lobby, WC and storage space
- FF: Bedroom 1 9.3sqm (single), Bedroom 2 14.0sqm (double).
- SF: Bedroom 3: 21.6sqm (double) with en-suite

2.9 All four units are 3-bed, 5-person dwellings, according to the Nationally Described Space Standards (NDSS). Although Unit 1 has three double bedrooms, the total GIA is 104.6sqm, which is below the 108sqm minimum required for a six person dwelling in the NDSS.

2.10 Outside, new permeable red paving would be laid on the path around the house, the existing lawn on the south side would be retained. The two blocks of garages on the northern side of the curtilage would be demolished. A covered, secure bike store would be erected on the north-west corner, by the junction of Fitzalan Road and Selbourne Road. A communal bin store and off road parking for five vehicles would be contained on the rear courtyard, which would be covered with a bound gravel surface. New soft planting would be installed around the new block to the north, and on the north side of the east wing, to create small private spaces for the new units – see KD.1041_A.-004 E by Krona Design for details of external hard and soft landscaping, and materials.

2.11 The proposed east wing and detached block would be built in red brick to match Wellesley Court. Care has been taken with the external appearance and materials to closely match the

main house, including a tile hung section on the north facing gable end elevation of the detached block, all new windows timber sash with curved or straight lintels, solid timber external doors, plain clay tiles for all roof coverings, and appropriately proportioned dormers.



Figure 1: Wellesley Court north elevation, from Selbourne Road



Figure 2: From Fitzalan Road, looking south



Figure 3: Fitzalan Road frontage

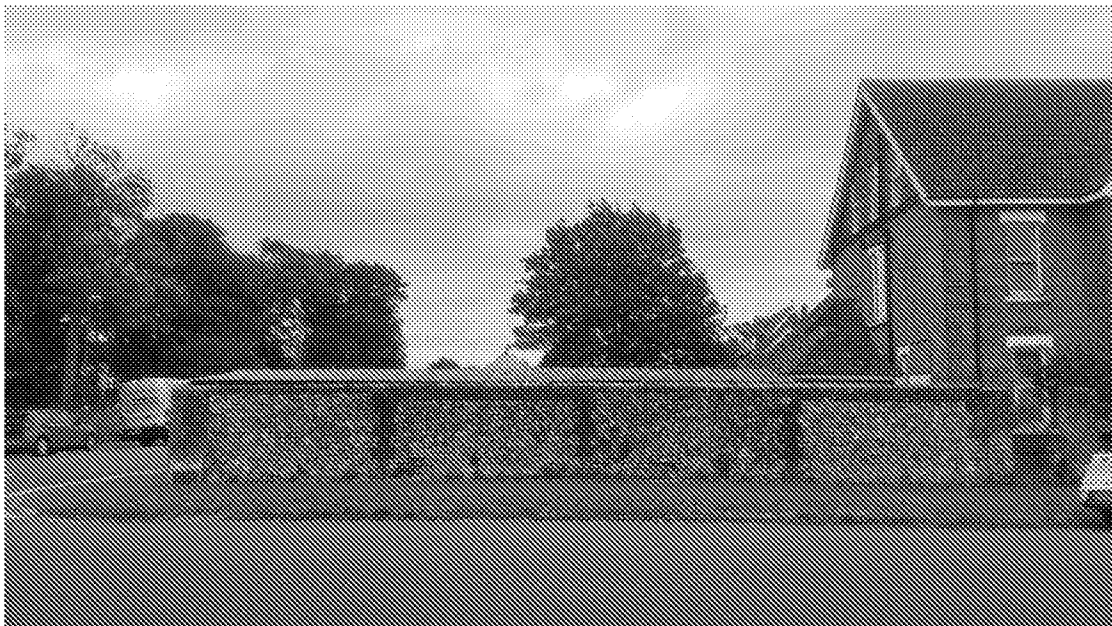


Figure 4: Site of proposed detached block of three townhouses, from Fitzalan Road.



Figure 5: Application site, from west side of Fitzalan Road



Figure 6: Site of proposed east wing, from Irvine Road



Figure 7: Southern Wing



Figure 8: Southern wing, looking towards houses on Irvine Road



Figure 9: Site of proposed east wing, in relation to side elevation of 3, Irvine Road



Figure 10: Southern wing of Wellesley Court. The proposal would add two extra 'bays' onto the end elevation



Figure 11: Area to the rear of the proposed east wing unit. This would be laid out as private garden for the new unit.



Figure 12: Inner courtyard, with later single storey extension on left



Figure 13: Site of proposed detached block. The single storey addition on the end elevation would be demolished.



Figure 14: Small outrigger on east, end elevation, to be demolished

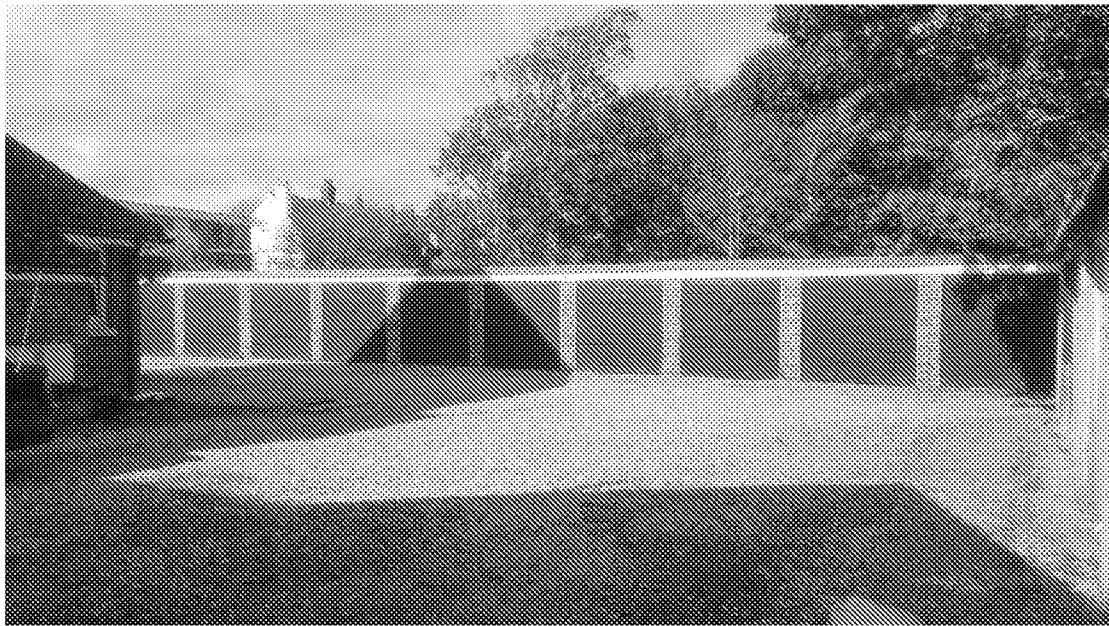


Figure 15: Block of ten lock up garages, to be demolished



Figure 16: Five lock up garages on eastern boundary, to be demolished. The tree would be retained.



Figure 17: End elevation of Wellesley Court. The proposed new block picks up on the various elements on the building.



Figure 18: Vehicle access off Selbourne Road. To be retained. Bins to be tidied away in bin enclosure.



Figure 19: Streetview along Selbourne Road, showing rear elevations of houses on Irvine Road. The house on the left hand side is located on the corner of Selbourne Road and Granville Road, and sits forward the other buildings.

3. PRE APPLICATION DISCUSSIONS

3.1 On 5th October 2020 a pre-application enquiry was submitted by WPS Planning to Arun District Council in respect of proposal for the demolition of Wellesley Court, along with the extension and sub-division of the two adjacent properties on Irvine Road, and the development of the site for 40 flats (PAA/102/20).

3.2 Although the current scheme is a departure from the 2020 pre-application proposals, advice received from the Officers at the time was fundamental in steering the evolution of the scheme. It was clear from the advice given by Planning Officer Anita Gardner that demolition of Wellesley Court, as a building of architectural interest in the Conservation Area, was not acceptable,

“The proposal results in loss of a building of architectural interest in the street scene and adversely affects the appearance and character of non-designated heritage assets in Irvine Road...These are important buildings of local interest.”

3.3 Heeding this advice, an alternative scheme that retained the existing building was developed. This comprised adding an additional two ‘bays’ to the eastern flank wall, and erecting a detached block in the rear, north courtyard physically separate from the main house. The infilling of the gaps was a criticism of the pre application scheme,

“The building would not retain a gap to side boundaries and would detract from the more spacious character of the area and the visual relationship of buildings contrasts starkly. The proposed structure joined to the adjacent buildings is visually overpowering and adversely affects their setting.”

3.4 To address this, the proposed scheme maintains visual gaps between the proposed east wing and 3, Irvine Road, and rather than extending off the northern flank wall a gap is maintained between Wellesley Court and the proposed detached block in the north courtyard.

3.5 On the amount of on-site parking to be provided, the Planning Officer advised that car parking requirements vary according to the accessibility of the site to public transport and services, or town centre. Arun Local Plan policy T SP1 refers to “appropriate levels of parking”. She continued,

“Although car parking is below this level the site is sustainably located being close to bus routes and within walking distance of the station and the below standard car parking

provision would be acceptable in this location. The proposal is likely to be acceptable in transport and highway terms in accordance with policy TSP1 of Arun Local Plan.”

- 3.6 The submitted scheme provides reduced levels of on-site parking, providing five parking spaces for 14 units (10 existing, 4 proposed). This is below the Arun standard of 2 spaces for each 3 bed unit and 1 space for 1 and 2 bed units, plus 20%. However, in light of the town centre location and planning policies that seek to reduce reliance on the private car, it is considered that the reduced on-site parking provision is acceptable – see Section 5.5 for more details.
- 3.7 The submitted scheme responds positively to the constructive advice received at pre-application stage, retaining the existing building and adding to it in a sensitive manner that respects the scale, density and detailing of Wellesley Court. Further information on how this has been achieved is detailed in section 5 below.

4. PLANNING POLICY CONTEXT

- 4.1 The local development plan for the area comprises the Arun Local Plan 2011-2031 and Littlehampton Neighbourhood Plan. The National Planning Policy Framework (NPPF) 2021 and Supplementary Policy Guidance SPD11 and SPD 13 are material considerations in the determination of this application.
- 4.2 The site is in the built up area boundary for Littlehampton and in the Littlehampton Seafront Conservation Area (CA). Wellesley Court is not in the Council's list of Buildings or Structures of Character (aka 'locally listed buildings'), however the Planning Officer has confirmed that the building is considered of architectural merit.
- 4.3 The site is within flood zone 3 (FZ3).
- 4.4 Relevant policies:

Arun Local Plan (LP)

SD SP1 Sustainable Development
SD SP2 Built-up Area Boundary
D DM1 Aspects of form and design quality
D DM2 Internal space standards
D SP1 Design
D DM1 Aspects of form and design quality
D DM2 Internal space standards
D DM4 Extensions & alterations to existing buildings
T SP1 Transport and Development
HER SP1 The Historic Environment
HER DM2 Locally listed buildings or Structures of Character
HER DM3 Conservation Areas
W DM2 Flood Risk
W DM3 Sustainable Urban Drainage Systems
ECC SP2 Energy and climate change mitigation
ENV DM5 Development and biodiversity

Littlehampton Neighbourhood Plan (NP)

Policy 1 Presumption in Favour of Sustainable Development

Policy 2 A Spatial Plan for the Town

Policy 3 Housing Supply

Policy 22 Design of New Development

NPPF

Paragraph 8: Achieving sustainable development

Chapter 12: Achieving well-designed spaces

Chapter 16: Conserving and enhancing the historic environment

- 4.5 The newly updated 2021 NPPF puts renewed emphasis on design quality. It advises that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (NPPF, 126).
- 4.6 Great weight is given to the conservation of designated heritage assets (199) and where development affects designated heritage assets and their settings applications must be accompanied by an assessment of the significance of that asset and the impact of the proposals on its significance (205). Proposals within the settings of heritage assets that enhance or better reveal their significance should be treated favourably (206).
- 4.7 The site is within FZ3, so W DM2 applies. It requires development to follow the sequential test and a site specific flood risk assessment to demonstrate safe access and egress without increasing flood risk elsewhere. W DM3 seeks to improve water capture on development sites by using the SUDS hierarchy.

5. CONSIDERATION OF PLANNING POLICIES

5.1 Introduction

- 5.1.1 The main considerations in this proposal are the district's five year supply of housing land (5YHLS), design and landscaping, the effect of the development on the character and appearance of the Littlehampton Seafront CA, and on Wellesley Court as a building of architectural interest; flood risk, impact on the amenity of occupants of nearby properties, the standard of accommodation for future occupants, and parking provision.

5.2 Five Year Housing Land Supply

- 5.2.1 The site falls within the defined built up area boundary for Littlehampton where there is a presumption in favour of development subject to consideration of other policies in the Local Plan (SD SP2).

- 5.2.2 Following the publication of the 2021 Housing Delivery Test results, Arun's housing land supply stands at 2.42 years, or 61% of target (as of November 2020) ¹. Where an LPA cannot demonstrate a five year supply of housing land (5YHLS) the presumption in favour of sustainable development applies and paragraph 11(d) of the NPPF is triggered:

"d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

- 5.2.3 Permission should only be refused where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole (11d, i). In this instance, because 2.42 years supply reflects an

¹ Arun District Council Authority Monitoring Report 1st April 2020 – 31st March 2021

acute housing supply shortage in the district, increased weight is given to the provision of four sustainably located units of housing when weighed in the planning balance.

5.2.4 As the proposed development is situated in an 'area or asset of particular importance' (the Conservation Area, a designated heritage asset), as per the closed list in 7, permission should be granted unless the application of other NPPF policies that protect areas or assets of particular importance would result in a clear reason for refusing the development.

5.2.5 The effect of the proposal on the character and appearance of the Littlehampton Seafront Conservation Area is assessed in the Heritage Impact Assessment by Studio Astragal. Subject to proper assessment against policies that protect the Conservation Area from inappropriate development, and other planning issues including impact on amenity and highways, the principle of the extension and new building at Wellesley Court is considered acceptable. It is supported by Local Plan policy H SP1 that makes provision for at least 20,000 new homes to be built in the district up to 2031. The figure includes a windfall allowance of 847 homes (Local Plan, Table 12.1)

5.3 Heritage Assets

5.3.1 NPPF paragraph 194 advises that applicants should describe the significance of designated heritage assets and the affect that development will have on that significance. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas (CA). In compliance with the Framework, a Statement of Heritage Significance and Heritage Impact Assessment by Studio Astragal accompany the application.

5.3.2 Geoff Bennett of Studio Astragal has been involved scheme since the early stages of the design process, to ensure the proposals preserve or enhance the Conservation Area. Preliminary heritage advice was received in October 2021. This informed the general form of the scheme, that being additional bays on the eastern end of the southern wing of the house, and a physically separate, subordinate building on the northern courtyard. As a result of this advice, a scheme was proposed that replicated the existing bays on the southern wing, and created a separate building in the rear courtyard. The scale of this building has been kept lower than the main house.

- 5.3.3 HER DM3 requires that new buildings in Conservation Areas acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings. Additions to existing buildings should be sensitively designed, constructed of appropriate materials and are sympathetic in scale, form and detailing and retain or emphasise the features and qualities of the existing buildings, townscape or streetscape in the area.
- 5.3.4 The proposed elevation drawing A201.E (copied in Figure 20) shows how the extension adds additional bays to the south elevation. Architectural details on the main house such as the timber framed windows, lintels, buttresses, dormers, exposed rafters have all been meticulously replicated on the extension. Walls would be in red facing brick to match the house, and matching interlocking concrete tile over.
- 5.3.5 To accommodate the need for the raised ground floor slab level (see Flood Risk section), the front entrance door is approached via external steps between a curved balustrade with metal railings.



Figure 20: Proposed South Elevation. The extension replicates the existing

- 5.3.6 At the rear of the property, the new building picks up on the architectural details of the main house, albeit this time designed as a separate addition, not an extension. The projecting gable on the west elevation is replicated on the new building. The eaves line is lower than the main house, bringing the eaves and ridge line down by 1200mm.

- 5.3.7 The proposal retains all historically important features on the site, including retaining the lawn at the front of the property (DM3e). The main change in views from outside of the site would be from the north and west – Figure 21. The west elevation has been designed to be in keeping with the main house. As noted in the Statement of Significance (6.1), the rear elevations facing north and east are of lesser significance and have been significantly compromised by unsympathetic alterations.
- 5.3.8 The Heritage Impact Assessment (HIA) concludes that Wellesley Court is of Low Heritage Significance and the Littlehampton Seafront CA of has Medium Heritage Value (see HIA, 6.1). Overall, the harm to the Conservation Area is considered to be less than substantial. This must be weighed against the public benefits of the proposal (NPPF, 202), which is the provision of four residential units in a sustainable location to meet housing need.
- 5.3.9 In light of the acute shortage of housing land in the district, and the location of this windfall housing site close to the town centre, amenities and public transport option, the provision of four dwellings must be given significant weight. In light of the findings of the HIA, which is that the development would have a neutral or slight to moderate adverse effect of the significance of heritage assets, these would not provide a clear reason for refusal when weighed against the provision of housing in a sustainable location.
- 5.3.10 As a result, the proposed development would result in less than substantial harm (NPPF, 202), which is outweighed by the public benefits in the tilted balance.



Figure 21: Proposed West Elevation. The new building is visually subordinate to the main house

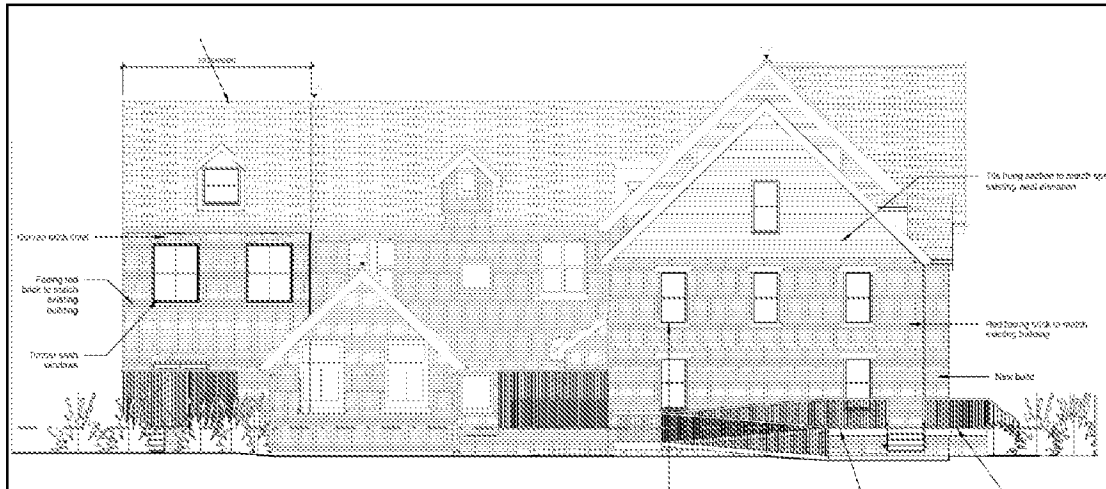


Figure 22: Proposed North Elevation

5.4 Flood Risk

5.4.1 The site is in Flood Zone 3a (FZ3a). A Stage 2 Flood Risk Assessment by GTA Civils accompanies the application.

5.4.2 The NPPF steers development away from areas at risk of flooding (NPPF, 159). In this case, the development is the enlargement of an existing residential site in the town, so the proposal can't be directed elsewhere, to an area with lower flood risk.

5.4.3 NPPF paragraph 163 advises that if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. As a 'more vulnerable' use in FZ3a, (Flood Risk Vulnerability Classification, NPPF Annex 3) the exception test has been applied:

"The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall." (NPPF, 164)

- 5.4.4 Local Plan policy W DM2 reiterates these criteria, requiring a site specific FRA in flood risk areas, the identification of the sustainability benefits to the wider community, and of adaptation and mitigation measures.
- 5.4.5 The development will provide wider sustainability benefits (164,b). The proposal represents a windfall housing site in a sustainable location within walking and cycling distance of local services, bus stops, the railway station and the town centre. Significant weight should be given to the provision of housing in the town in the tilted balance.
- 5.4.6 The EA modelled flood levels put the 2115 “defended scenario level” at 3.51m above Ordnance datum (AOD). Ground floor slab level within the proposed development is therefore set at 3.51m AOD, which is 0.52m above the 2.99m AOD threshold in the existing building (FRA, 2.8). This raised ground floor slab level protects future occupants from flood events. 3.51m was considered a reasonable compromise between ensuring future occupants are safe and preserving the character and appearance of the Conservation Area and this building of architectural merit. As explained in the FRA,
- “For full compliance of flood risk policies, new buildings’ (habitable accommodation) floor levels must be set at least 0.3m above the critical flood level over its expected lifetime. The existing ground floor’s level is set and both extensions’ floor level shall be set at 3.51m AOD. Setting these to 3.81m AOD was considered - but the level difference was such that compliance with Building Regulations Parts K and M would not have been possible. No bedrooms are proposed on the ground floor – these are all on the upper 2 levels.” (FRA, para. 3.6)
- 5.4.7 Additional flood mitigation measures include passive flood barriers to external doors (FRA, 3.7) and the preparation of a Flood Risk Management Plan (FRA, Annex). Providing future occupants with the Management Plan will put in place appropriate flood warning and evacuation measures, in accordance with W DM2(e).
- 5.4.8 The raised ground floor slab level and other mitigation measures are sufficient to ensure that future occupants are safe in the event of future flood events. The proposed development passes the exceptions test in paragraph 164.
- 5.4.9 Surface water will drain to new permeable surfacing consisting of porous paving with a coarse, granular fill around the buildings – see Proposed Site Plan A.004 E. Details of calculated surface water flows are provided in section 4 of the FRA.

- 5.4.10 The FRA concludes that the development will not increase the flood risk on or off site, and is NPPF and W DM2 compliant.

5.5 Transport and Highways

- 5.5.1 A pre-application stage the Planning Officer advised that reduced on-site parking would be acceptable in this location due the site being sustainably located, being close to bus routes and within walking distance of the train station. NPPF 107 encourages lower parking provision on sites with access to alternative transport modes including public transport. Easy access to local bus services and Littlehampton railway station will encourage the use of sustainable transport modes over the private vehicle.
- 5.5.2 The development proposes five off-street car parking spaces, which would be a reduction in the number of amount of car parking space currently available on the rear courtyard. However, the proposal includes a bike store for 16 bicycles. This will replace the smaller bike shelter in the north-west corner of the site. The proposed number of cycle spaces is in excess of the 14 spaces that would be required to meet the one cycle space per unit in the Arun parking standards. The flat topography around the site makes cycling a feasible transport option for future occupiers.
- 5.5.3 The development therefore promotes healthy lifestyles and sustainable transport, and use of the cycle and pedestrian network in accordance with T SP1 of the Local Plan.
- 5.5.4 The existing vehicle access off Selbourne Road would remain unchanged.
- 5.5.5 Amenity of Adjoining and Future Occupants
- 5.5.6 The nearest residential property to the development site is 3, Irvine Road, situated to the east of the site of the proposed side extension. There is one small window in the end, western flank wall of the neighbouring property, which appears to serve a bedroom. See Figure 23.
- 5.5.7 A distance of 3.7 metres would be maintained between the end elevation of the extended part of the Wellesley Court, and the side flank wall of 3, Irvine Road – see Figure 23. There are no windows proposed in the east facing, end elevation of the extension.

- 5.5.8 Although the bedroom at 3 Irvine Road would lose some outlook, appeal decisions ^{2, 3} have confirmed that outlook from, and daylight to, bedrooms is not as critical as it is for habitable rooms that are occupied during the daytime.
- 5.5.9 Oblique views over neighbouring properties' garden would be possible from dormer windows, but this degree of mutual overlooking of adjoining properties from upper storey windows is already a character of the area. Additional dormer and first floor windows at Wellesley Court would not amount to material harm to the amenity and privacy of occupants of nearby properties.
- 5.5.10 On the west side, the proposed new building is removed from other nearby properties.
- 5.5.11 Policy D DM1 requires that development has minimal impact to users and occupiers of nearby properties, by way of loss of sunlight, privacy and outlook. It is considered that the proposal is compliant with this policy and would not impact upon on the amenity of adjoining occupants.
- 5.5.12 All four units meet the standards in the DCLG Nationally Described Space Standards for 3-bed, 3-storey, 5-person dwellings, the minimum GIA of which is 99sqm. This is in accordance with D DM2 of the Local Plan. All four units would have private, outdoor amenity space.
- 5.5.13 In the existing block, Flat 4 will be converted from a two bedroom to a one bedroom unit and its entrance door moved to the north, end elevation. See KD.1041_A.100 'Existing Plans' and A.101 D 'Proposed Plans'. Flat 4 benefits from east and west facing windows at ground and first floor level, so will receive light and outlook to the ground and first floor rooms.

² APP/Q1445/W/17/3176467, 79 Trafalgar Road, Portslade, BN41 1GU

³ APP/Q1445/A/14/2220337, 14 Dyke Road, Brighton BN1 3FE



Figure 23: Side flank wall of 3, Irvine Road

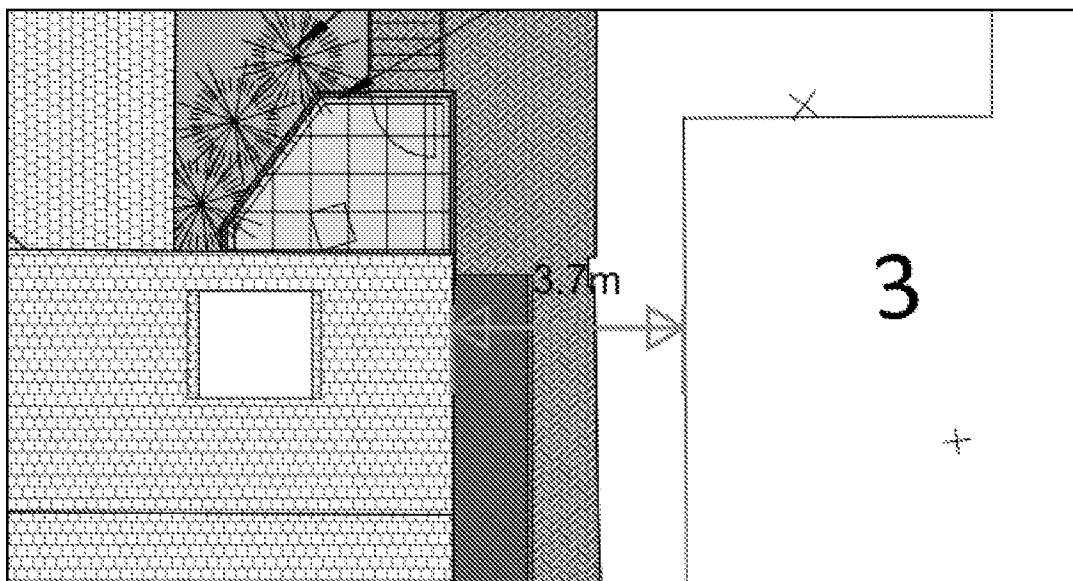


Figure 24: Extract from Proposed Site Plan A.004 E, with wall to wall distance with 3 Irvine Road.

6 SUMMARY

- 6.1 This application proposes the addition of four residential dwellings to Wellesley Court, an existing property containing ten flats, some half a mile east of Littlehampton town centre. The development comprises a two storey, side extension to the south wing and a new, separate building in the northern courtyard.
- 6.2 The development would provide 16 secure, covered cycle parking spaces and five off street car parking spaces. The proposed extension and new building would complement the existing late Victorian building, with the extended part forming two new bays on the south wing, and the detached block matching the main house in terms of scale, form, materials and detailing.
- 6.3 The Council cannot demonstrate a five year supply of housing land. Current supply stands at 2.42 years. This acute shortage of housing triggers NPPF paragraph 11(d). The application of paragraph 11(d) proves conclusively that the adverse impacts of approving the development do not 'significantly and demonstrably' outweigh the benefits of providing four units of housing in a sustainable location.
- 6.4 The site is in FZ3, where development is required to pass the exceptions test. The proposal would provide wider sustainability benefits, and incorporate mitigation measures to ensure that future occupants were not vulnerable to flooding.
- 6.5 Wellesley Court is a building of architectural interest, and the site is in the Littlehampton Seafront Conservation Area, where development is required to preserve or enhance the Conservation Area. On balance, it is considered that less than substantial harm would result from the development, and this is outweighed by the public benefits of providing four residential dwellings that contribute to housing supply.
- 6.6 When weighed in the planning balance, it is considered that the adverse impacts of the proposal, namely the less than substantial harm that would accrue to the Conservation Area, is outweighed by the benefits of the proposal. The adverse impacts do not "significantly and demonstrably" outweigh the benefits, as is required by paragraph 11(d) to warrant refusal.
- 6.7 The proposal would provide four units of much needed housing in a sustainable location, meeting all three arms of sustainable development: social, economic and environmental. It will provide housing for those most in housing need (social role). It will create economic activity during construction and provide job opportunities for future occupants due to the site's location within easy access to the town centre and Littlehampton railway station (economic

role). Finally, it will encourage modal shift, reducing peoples' need to travel by car and switch to walking, cycling and public transport (environmental role).

6.8 In light of the above, we respectfully request that the application is approved.