



Arun District Council  
Arun Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF  
Planning General Enquiries  
Tel: (01903) 737756 Fax: (01903) 730442  
Dx: 57406 Littlehampton  
Minicom: 01903 732765  
e-mail: [planning@arun.gov.uk](mailto:planning@arun.gov.uk)  
website: [www.arun.gov.uk/planning](http://www.arun.gov.uk/planning)

Michael Hemmings  
8 Alford Business Centre  
Loxwood Road  
Alford  
Surrey  
GU6 8HP

**Your Ref:**  
**Our Ref: PAA/35/15/**

**Please ask for: Mrs A Gardner**  
**01903 737529**

30th April 2015

Dear Mr Hemmings

### **Pre-Application Advice**

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To demolish existing row of 4 shops with living accommodation in the roof space and replace them with a terrace of four two storey dwellings.

80-86 Elmer Road Middleton

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I write regarding the above matter and your enquiry received on 18th March 2015.

### **Description Of Proposed Development**

From the details submitted, I understand that you propose to demolish the existing row of 4 shops and replace them with a terrace of four 2 storey dwellings.

### **Description Of Site**

Commercial site

The application site comprises a one and a half storey terrace of former business premises which are currently vacant. No parking is available on the site frontage. Railings exist along the road frontage. The site is generally flat and there are no trees affected by your proposal.

### **Description Of Locality**

Built-up Locality Mixed uses

The area is part of a village centre setting with mixed uses. A pub is located opposite the site and a takeaway and hairdressers to the north. Several residential properties mainly bungalows are located along Elmer Road to the north and south of the site.

### **Planning Issues**

The following issues have been identified for consideration.

Principle  
Design  
Neighbour Amenity  
Amenity Space Provision

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## Relevant Planning History

|             |                                                          |                                    |
|-------------|----------------------------------------------------------|------------------------------------|
| M/37/15/DEM | Prior notification for proposed demolition of 4No. units | Objection<br>15-04-2015            |
| M/65/96     | Change of use of retail shop Class A1 to office Class A2 | ApproveConditionally<br>15-11-1996 |

## Relevant Policies - the following policies are considered relevant to your proposal:

|                           |       |                                                           |
|---------------------------|-------|-----------------------------------------------------------|
| Arun District Local Plan: | DEV30 | Local and Village Centres                                 |
|                           | GEN7  | The Form of New Development                               |
|                           | GEN12 | Parking in New Development                                |
|                           | EDDM1 | D DM1 Aspects of Form and Design Quality                  |
|                           | EDSP1 | D SP1 Design                                              |
|                           | EDDM2 | D DM2 Internal Space Standards                            |
|                           | EDDM3 | D DM3 External Space Standards                            |
|                           | MDS   | Middleton-on-Sea Village Design Statement by Middleton PC |

## Planning policy guidance

|                         |     |                                                           |
|-------------------------|-----|-----------------------------------------------------------|
| Supplementary Guidance: | MDS | Middleton-on-Sea Village Design Statement by Middleton PC |
|-------------------------|-----|-----------------------------------------------------------|

## Principle

Inside Built-up area boundary : The site lies in an urban area where the principle of development is considered acceptable. The Government's Planning guidance supports effective and efficient use of land for sites such as this but also advises that new housing is well integrated with and complements neighbouring buildings and local area in terms of scale, density, layout and access.

## Design

Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(ii) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout.

The proposed development is considered unacceptable by reason of conflict with policies and advice because the roof heights of the units would be significantly greater than adjoining development to the south and the proposal would therefore appear prominent and obtrusive in the street scene.

With regard to layout policy DDM2 sets out the minimum internal space standards for new dwellings to meet the changing needs of occupants and policy DDM3 sets out minimum private amenity space standards. New developments are required to meet the guidelines. The minimum Essential General Internal floor area for a 3 bedroom 4 person 2 storey house is 87 sq m. The proposed plots have an area of 77m<sup>2</sup>. None of the properties therefore meet these requirements. All plots have undersized second and third bedrooms and ground floor toilets. Policy DDM3 requires 3 bedroom semi detached developments to have a minimum rear garden size of 85 sq

metres. The largest garden is 60sqm, 2 are 50sqm and the smallest is 30sqm is significantly below this requirement. The proposal does not meet these standards and whilst refusal of the application solely on these grounds would be inappropriate given that the Plan has not yet been adopted it does indicate that the development is cramped and that the dwellings proposed are too large for the plots. The footprints, height and number of units are excessive.

### **Neighbour Amenity**

Arun District local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. In this case, it is considered that the proposed development would be unacceptable on the residential amenities of neighbouring properties because the height and proximity of the unit adjacent to 'Mayfield' the bungalow to the south would be overbearing. The bungalow has a side facing dormer window which will be adversely affected by a loss of outlook and light reduction given the roof height.

### **Highways Transport And Parking**

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to accessibility of the site to public transport or services, or location within a town centre. Some Guidance is provided within Appendix 2 Parking Standards of the Arun District Local Plan. The proposal will need to be subject to comments from West Sussex County Council Highways as there may be objections to the impact on the located bus stop and the crossing of a public footpath to access the proposed 4 parking bays.

### **Drainage Engineers Comments**

The Council's Drainage Engineers have made the following comments Engineers advice on surface water drainage:

Any proposed surface water drainage scheme will need to consider the use of sustainable drainage principles(SuDS).

SuDS Selection

The design will need to follow the hierarchy of preference for different types of surface water drainage systems as set out in Approved Document H of the Building Regulations and the Sustainable Urban Drainage System (SUDS) Manual produced by CIRIA. This means that the developer must first consider the discharge of surface water into an infiltration device (eg. soakaway, basin, swale, permeable paving etc) before considering any other method.

Infiltration Drainage Design

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE 365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 30% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location.

Any SUDS or soakaway design will need to include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. Supplementary guidance notes are also enclosed for information.

### **Suggested External Consultees:**

WSCC Strategic Planning

SU.Local.Development@westsussex.gov.uk

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## Conclusion

Since the premises are former retail units any application submitted would need to demonstrate that the premises have remained empty for some time and that retail use is no longer viable or a refusal would be likely on the grounds of non-compliance with policy DEV30 of Arun District Local Plan. Notwithstanding viability issues, based on the above comments in relation to design and amenity I conclude that were an application for planning permission to be submitted it would be likely to be refused for the following reasons:

The proposal by virtue of its size, height and design does not relate sympathetically with the existing character and appearance of the area. Furthermore, the proposal by reason of its plot coverage and limited rear garden size would result in a cramped form of development which would not ensure a satisfactory environment for the occupants of the proposed properties, contrary to policy GEN7 of the Arun District Local Plan, policies DDM1, DDM2 and DDM3 of the Emerging Local Plan and the NPPF.

The proposal by reason of its height and proximity to the southern boundary would be unneighbourly on the adjoining residential dwelling in conflict with policy GEN7 of Arun District Local Plan and policy DDM1 of the Emerging Local Plan

## Making a Planning Application

If you decide to proceed with making a planning application you will need to quote the reference number for this advice in the pre-application advice section of the planning application form. This will ensure that the application receives priority and a speedy validation process.

### **You will need to submit the following documentation/information with your application to meet the National Validation Requirements:**

Fully completed and signed Application Form with full description of the proposal.  
Ownership Certificate and Agricultural Land Declaration  
Design and Access Statement  
Correct Fee  
Location Plan (1:1250)  
Site / Block Plan (1:500)  
Elevations (Existing and Proposed)  
Floor Plans (Existing and Proposed)  
Roof Plans

### **Additionally the following documents will need to be provided to meet the Local Validation Requirements:**

Please note that the Council introduced a new Local Validation Requirements List in July 2013 which you should refer to before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked through the Local Validation Requirements List, I would suggest that the following additional documents will be required:

Foul and Surface Water Drainage Statement  
Bin Storage and Collection Provision  
Parking Plan  
Street Scene  
Viability Report

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions

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expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note that this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Karl Roberts', with a stylized flourish underneath.

Karl Roberts  
Assistant Director Planning Services &  
Housing Strategy