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Planning and Development  
Arun District Council  
Arun Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex  
BN17 5LF

Our ref: 92000000021875

20<sup>th</sup> April 2021

Dear Sir/ Madam,

#### **TOWN AND COUNTRY PLANNING ACT 1990**

#### **APPLICATION FOR A SINGLE STOREY UPWARDS EXTENSION TO PROVIDE AN ADDITIONAL FOUR RESIDENTIAL UNITS (USE CLASS C3).**

**SITE ADDRESS: 66 THE STREET, RUSTINGTON, LITTLEHAMPTON, BN16 3NR**

This application is submitted on behalf of our client, Envision Contracting Ltd, and seeks planning permission for the construction of a single storey upwards extension to provide four residential units (Use Class C3) at 66 The Street, Rustington, Littlehampton.

The formal description for which planning permission is being sought is as follows;

*"The construction of a single-storey upwards extension to provide an additional four residential units (Use Class C3)".*

The application has been submitted via Planning Portal (Ref: PP-09649661) and comprises the following:

- This Covering Letter;
- Application Form;
- CIL Form;
- Location Plan (Ref: SLP01) (scale: 1:1250@A3);
- Block Plan (Ref: BP01) (scale: 1:500@A3);
- Existing Ground Floor Plan (Ref: E01) (scale: 1:100@A3);
- Existing Elevations 1-3 (Ref: E02) (Scale: 1:100 @A3);
- Existing Elevations 4-6 (Ref: E03) (Scale 1:100 @A3);
- Existing Section (Ref: E04) (Scale: 1: 100 @A3);
- Proposed Ground Floor Plan (Ref: P01) (scale: 1:100@A3);
- Proposed First Floor Plan (Ref: P02) (Scale: 1:100 @A3);
- Proposed Roof Plan (Ref: P03) (Scale: 1:100 @A3);
- Proposed Elevations 1-3 (Ref: P04) (Scale: 1:100 @A3);

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- Proposed Elevations 4-6 (Ref: P05) (Scale: 1:100 @A3);
- Proposed Section (Ref: P06) (Scale: 1:100 @A3); and
- Transport Statement (prepared by RGP);

The statutory application fee is £1,848 and has been paid via Planning portal.

### **Site and Surrounding Area**

The site is located within the authoritative boundary of Arun District Council and is located at the north-eastern extent of Rustington Village's centre. It comprises a single storey commercial building which is approximately 181.1m<sup>2</sup>. The property had been occupied by Tony James Dental Laboratory Limited since 1989 for the manufacturing of dental products and therefore had previously been operating within Use Class B1(c) (Light Industrial) (now Use Class E) and had lain vacant since March 2018. The property has since had prior approval for the conversion into 6 residential units (Use Class C3) and works are about to commence on the conversion to residential.

The site is located to the rear of a small parade of shops which front The Street. Vehicular access is located from The Street via an access road which serves both the Site, parking to the rear of the shops and the care home development at 68 Pegasus Court. The Site benefits from off-street parking for up to six vehicles, located towards the southern boundary of the Site.

The site is in Flood Zone 1 (low probability of flooding) and also falls within the Rustington Town Centre boundary and the Rustington Conservation Area.

### *The Surrounding Area*

The character of the locality is a mix of commercial and residential development. Residential areas are located directly to the north and the west of the Site. The commercial units directly to the south of the Site that front The Street include a Thai restaurant, two charity shops and a fast food takeaway but all have residential above. The Parish Church of Saint Peter and Saint Paul, Rushtington is located directly south of The Street and The Lamb Inn Pub is located to the south west of the Site.

From The Street (B2140) the wider local highway network of the A259 can be accessed via Ash Lane to the east of the Site. The A259 travels between Bognor Regis, to the west and Worthing to the east.

The closest bus stops to the Site are the Lamb Inn bus stop, which is located a 150m walk to the west of the property and 200m west of the Shops bus stop. These stops are served by service 700; The Coastliner, which operates a 10-minute frequency service. The regular local bus services are available within walking distance of the property, enabling prospective tenants to travel to and from the Site via bus.

The nearest National Rail Station to the Site is Angmering, which is located approximately 2.2km north-east of the Site. The Site has convenient access to local amenities, including retail, employment and leisure opportunities.

### *Planning History*

Through undertaking an online planning history search, it can be confirmed that the property benefited from lawful light industrial use by virtue of a 1987 planning permission (Ref: R/298/87) for the “*Marley enterprise building for printing workshop- partial demolition of existing buildings and parking at front*”.

more recently, the Site had been occupied by Tony James Dental Laboratory Ltd for dental practice manufacturing which has operated under Use Class B1(c) (Light Industrial) since March 1989.

The unit fell vacant in March 2018 and subsequently in 2019, a prior approval application for the change of use from light industrial (Use Class B1(c)) to residential (Use Class C3) to provide six residential apartments was submitted to Arun District Council (ref: R/205/19/PD). The prior approval application was approved in October 2019. The prior approval is in the process of being implemented and the applicant is in the process of discharging the relevant pre commencement conditions with Arun District Council, once this has been approved works will start on the conversion to residential.

### **Proposal**

This application seeks planning permission for the provision of a single storey upwards extension to provide a first floor at 66 The Street. The additional floor will accommodate four additional residential units (1x1 bed and 3 x 2 beds) which will sit above the previously approved six residential units, providing an overall provision of 10 units at the site.

The scheme provides 1 x 1 bed units and 3 x 2 bed units. All of the proposed units will be for market housing and will make a small but meaningful contribution towards the provision of housing within the borough. The new dwellings will provide a good standard of accommodation and all dwellings will meet or exceed the minimum internal space standards. Each of the proposed four residential units will also benefit from a private balcony.

The existing ground floor is u-shaped with a parking courtyard area between the building. It is proposed that the first floor will cover the entire existing ground floor and cover the central external parking courtyard area, creating a covered courtyard and providing a larger floor plate at first floor level.

The proposed upwards extension will extend to a total height of 5.4m and will be constructed of white render to match the existing ground floor. The upwards extension will provide a flat roof with proposed skylights to provide adequate natural daylight into the residential apartments.

Vehicle access will remain unchanged and will be made from The Street, via an access road which serves both the site, parking to the rear of the shops and the residential development at No.68 Pegasus Court, The Street. The site has off-street parking provision for up to six vehicles, located towards the southern boundary of the site, although some of the parking provision is tandem and therefore it is considered that the site can accommodate four independently accessed car parking spaces, within the curtilage of the site. Although this is below the parking requirements, there is significant spare capacity on the local highway network to accommodate up to three displaced vehicles.

### **Planning Policy Framework**

This section sets out the planning policy framework of relevance to the application proposal. Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that in making any determination under Planning Acts, regard is to be had to the Development Plan, and the determination must be made in accordance with that plan, unless material consideration indicates otherwise.

The Statutory Development Plan is as follows:

- Arun Local Plan 2011-2031 (2018);
- Arun Local Plan Policies Map (2018); and
- Rustington Neighbourhood Plan (2014).

In addition to the Development Plan, the following are material considerations in this assessment:

- ❖ National Planning Policy Framework (2019); and
- ❖ Local Supplementary Planning Documents and Guidance.

### **National Policy**

#### *National Planning Policy Framework (NPPF) (February 2019)*

The new NPPF was adopted in February 2019, following the adoption of the Merton Core Strategy (2011) and the Sites and Policies DPD (2014). In such cases, Annex 1, paragraph 213 advises that existing policies should not necessarily be considered out-of-date and that due weight should be given to them, according to their degree of consistency with this Framework; the closer the policies in the plan to the policies in the Framework, the greater the weight may be given. This should be borne in mind when considering the following Policy Review.

#### *Presumption in Favour of Sustainable Development*

The NPPF sets out the Government's presumption in favour of sustainable development at paragraph 11. The Government's presumption in favour of sustainable development. For decision taking, this means:

- “c) approving development proposals that accord with an up-to-date development plan without delay; or
- 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.”

Paragraph 8 identifies that the ‘economic objective’ of planning in the context of sustainable development is to contribute to building a ‘strong, responsive and competitive economy’ and to support growth, innovation and improved productivity.

### *Housing*

Paragraph 59 details that in order to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

### *Transport*

Section 9 of the NPPF relates to the promotion of sustainable transport and seeks to manage the impacts of development on transport networks. It sets several considerations to facilitate this, including identifying opportunities from an infrastructure perspective as well as from sustainable transport initiatives, and ensuring that environmental impacts of transport are fully considered.

Paragraph 108 sets out transport requirements for development proposals, including sustainable transport modes, safe and suitable access, and mitigation for any transport impacts. Paragraph 110 builds on this providing further criteria for developments to adhere to. These include:

- Designing for pedestrian and cycle movements as a first priority with high quality public transport as a second;
- Catering for reduced mobility and disability in all transport modes;

- Creating safe places, which are secure and attractive and minimise conflict between differing modes of transport;
- Consider servicing and emergency access; and
- Integrate electric charging vehicles.

#### *Effective Use of Land*

Paragraph 117 promotes the effective use of land and encourages the use of previously developed or brownfield land, as much as possible.

In this regard, substantial weight is given to the value of using suitable brownfield land for development and the development of underutilised buildings, at paragraph 118. In order to support this, paragraph 120 requires policies and decisions to reflect changes in demand.

#### *Design*

Paragraph 124 emphasises the importance of good quality design in making better places for people, stating that it is a key part of sustainable development and indivisible from good planning.

Paragraph 127 sets out several considerations to incorporate in developments, including the functioning of a site and surrounding area, visual appeal, sympathetic to local character and history, sense of place, inclusive and accessible place, and mixed developments (where appropriate). Paragraph 127 emphasises that developments should create “attractive, welcoming and distinctive places to live, work and visit.”

#### **Arun Local Plan**

The Arun Local Plan 2011-2031 was adopted on the 18<sup>th</sup> July 2018 and comprises the written statement and supporting policy maps. The plan sets out the spatial vision, objectives and sustainable strategy for delivering needed growth of the District over the period 2011-2031.

Policy SDSP2 ‘Built-up Area Boundary’ states that development should be focused within built up areas such as town centres.

Policy D DM4 ‘Extensions and Alterations to existing buildings’ sets out criteria against which applications relating to extensions and alterations of existing buildings will be assessed. They generally seek to minimise the impact of the proposal on the character of the host dwelling, its neighbours and the locality.

Policy DSP1 ‘Design’ encourages development proposals to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

Policy HER DM3 seeks to ensure that proposals preserve or enhance the character or appearance of Conservation Areas.

Policy DDM2 'Internal space standards' states that the Council will require internal spaces to be appropriate in size and meet the requirements of all occupants, Nationally Described Space Standards should be adhered to.

### ***Rustington Neighbourhood Plan 2014***

The Rustington Neighbourhood Plan sets out the specific planning policy proposals for the parish with a view to the document becoming made as part of the Development Plan.

Policy 2 'Housing Design' states that development proposals will be supported, provided that their scale, density, massing, height, layout and materials reflect the architectural and historic character of the surrounding buildings and landscape.

### **Supplementary Planning Documents**

#### *Arun Parking Standards 2020*

The Arun District Parking Standards takes standards and evidence produced and consulted on by the County Council, along with its own documentation and tailored it to make it applicable to the situation within Arun District. 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. The Arun District Council Parking Standards January 2020 SPD was officially adopted at the Full Council meeting of 15<sup>th</sup> January 2020.

The Parking Standards require one car parking space per flat with two or less habitable rooms and 0.2 spaces for visitors per flat. Therefore, a total provision of 1.2 spaces are required per unit.

### **Planning Assessment**

#### *Principle*

The application proposes the development of a first floor to provide four additional residential units (1x 1 bed and 3 x 2 bed).

The site comprises an existing single storey commercial building providing 181m<sup>2</sup> of floorspace, the unit has since had prior approval for the conversion to six residential units the applicant is currently in the process of discharging the relevant pre-commencement conditions in order to commence works to implement the prior approval.

The site is in the built-up area in a highly sustainable location with potential for trips to be made on foot, by cycle or by bus. The additional residential units could result in moderate benefits to the local community by providing residential accommodation to help meet future needs, create/maintain construction jobs, improve local infrastructure and result in additional spending in the local area by future residents. Given

the site is located within the built-up area boundary where development is acceptable in principle in accordance with policy SD SP2 of the Arun Local Plan.

The Council is not currently able to demonstrate a 5-year housing land supply. This proposal provides four additional dwellings in a sustainable location in the built-up area boundary and will make a moderate contribution to the current housing land supply shortfall. The proposal is judged to be in accordance with ALP policies SD SP1 & SD SP2 and with the guidance in the NPPF on the efficient use of land. The proposed scheme seeks to deliver a total of four additional dwellings. The NPPF emphasises the importance of significantly boosting housing supply. Chapter 5 states that *“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”* Moreover, Section 11 gives substantial weight to the value of using brownfield land to deliver housing.

There is a substantial requirement for further housing provision in the Borough, therefore a residential scheme should be considered acceptable from a policy perspective.

#### *Design*

In terms of design, we understand the importance of a high-quality scheme which reflects the character of the surrounding area. It is noteworthy that the scheme has been carefully conceived and designed to appear visually cohesive with surrounding properties.

The existing building does not positively contribute to the character and appearance of the Conservation Area. The proposed upwards extension will be in keeping with the existing property through matching the existing materials of the single storey building and it would have no detrimental harm on the established character of the building or its locality. The proposed works are deemed to be in accordance with HER DM3, D DM1 and D DM4 of the Arun Local Plan. Policy D SP1 of the Arun Local Plan requires all development proposals to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

Policy 2 of the Rustington Neighbourhood Plan requires new development to reflect the architectural and historic character and scale of the surrounding buildings and landscape and to comply with Arun's adopted parking standards. It is proposed to construct a single storey upward extension with a flat roof. The proposed has been designed using a similar material palette to the surrounding buildings and matching the existing.

This proposal retains space around the buildings in keeping with the character and complements the appearance of the development as a whole by respecting the scale of existing buildings and contributes to a sense of cohesion and unity. Given the above the design of the proposed first floor is considered to be acceptable and to comply with policy D DM1 and DSP1 of Arun Local Plan.

#### *Dwelling Standards*

In terms of residential spaces standards, all units are in accordance with the Nationally Described Space Standards. All units meet or exceed these standards.

### *Amenity*

The units have been carefully designed to provide an appropriate standard of accommodation which is attractive to potential occupiers, providing good quality living space in terms of unit size, privacy and access to private amenity provision. Each of the proposed additional residential units benefit from a private balcony.

### *Transport*

A Transport Statement dated November 2020 has been prepared by RPG Transport Planning and Infrastructure Design Consultants and accompanies this application. It was carried out in keeping with best practice and current planning guidance and determines that the Site is accessible to a range of local facilities, helping to reduce the need to travel long distances for many journeys.

The conclusions of this report are extracted below:

- The site is accessible by a range of non-car modes of travel, with prospective residents well located to the village centre of Rustington to be able to access a range of local amenities without the need for a car, as well as public transport links.
- The development proposal provides four car parking spaces which can be accommodated within the Site boundary and although this is below the WSCC standards, there is significant spare capacity on the local highway network to accommodate up to three unallocated spaces.
- Cycle parking, in accordance with the WSCC standards would be provided on Site.
- No changes are proposed to the access or servicing arrangements for the Site.
- The proposed first floor to provide four residential units would only result in a slight increase in terms of traffic generation however there is no material impact to the character of traffic as a result of the proposal is expected.

As such, the proposals are acceptable on highways grounds and therefore, there are no highways and transportation reasons why the addition of four residential units would not be acceptable.

### **Conclusion**

This application seeks planning permission for the provision of an upwards extension to provide a first floor to accommodate four additional residential units at 66 The Street.

The principle of residential use within this location, has already been established by virtue of the recently approved prior approval application for the existing building and residential developments within the surrounding area. The site evidently represents a brownfield site and is a suitable and sustainable location for residential development, contributing to local housing need. This residential application is thereby considered to be acceptable, in principle.



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In light of the above, we trust you can consider this application favourably and we look forward to receiving confirmation that the application has been validated. In the meantime, if you require any further information or clarification please contact Victoria Bennion on 0207 399 5884.

Yours faithfully,

Victoria Bennion

Senior Planning Consultant on behalf of Jones Lang LaSalle Ltd