

PLANNING STATEMENT

GARAGES AT FORMER RUSTINGTON MANOR HOTEL, BROADMARK LANE,
RUSTINGTON, BN16 2HH

APPLICATION FOR PLANNING PERMISSION
ON BEHALF OF MR PETER LEACH

NOVEMBER 2024

Client: Mr Peter Leach

Site Location: Garages at Former Rustington Manor Hotel, 1A Broadmark Avenue
and 12 Broadmark Lane, Rustington, West Sussex, BN16 2HH

Job History:

Version	Date	Author	Checked	Notes
V1	05/11/2024	J Pearson	L Carter	
V2	12/11/2024	J Pearson L Carter	Client	
FINAL	19/11/2024	J Pearson L Carter		

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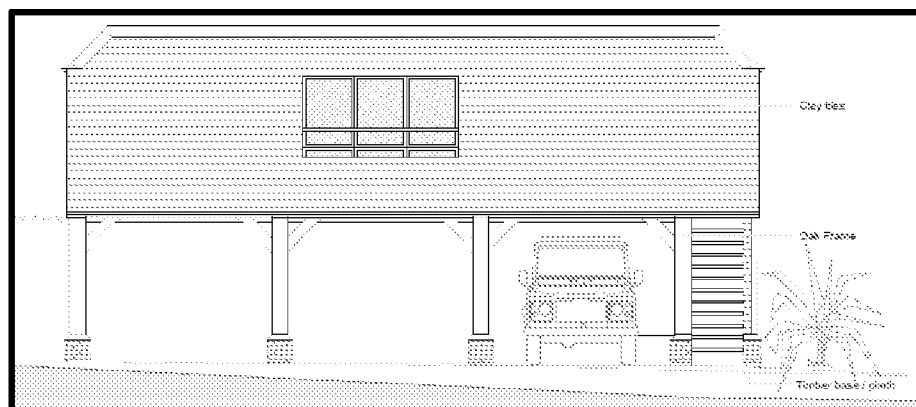
1.0 INTRODUCTION AND SUMMARY

- 1.1 This Statement accompanies the application by Mr Peter Leach for planning permission at 1A Broadmark Avenue and 12 Broadmark Lane in Rustington for the *demolition of existing pair of garages and erection of a three-bay car port with studio flat (Use Class C3) above.*



Proposed Block Plan

- 1.2 The proposal would remove a utilitarian garage building and replace it with a new oak-framed car port with a pitched clay tile roof. The building in question is located on the northern edge of the application site.



Proposed Car Port

- 1.3 As part of the works, new planting and road signage is proposed along the entrance to Broadmark Avenue. The car parking layout will also be revised to ensure that sufficient car parking capacity is available onsite alongside the consented development of the wider site for residential use under application reference **R/49/24/PL**.
- 1.4 This Statement will show that the development proposals will offer an overall visual improvement to the site alongside a more efficient use of land within the established residential area. The proposals meet all relevant local and national planning policy requirements and protect the amenities of surrounding residents, whilst delivering an additional home as part of the wider redevelopment of the site.
- 1.5 The Statement should be read in conjunction with the submitted drawings and application forms.

2.0 SITE AND SURROUNDING AREA

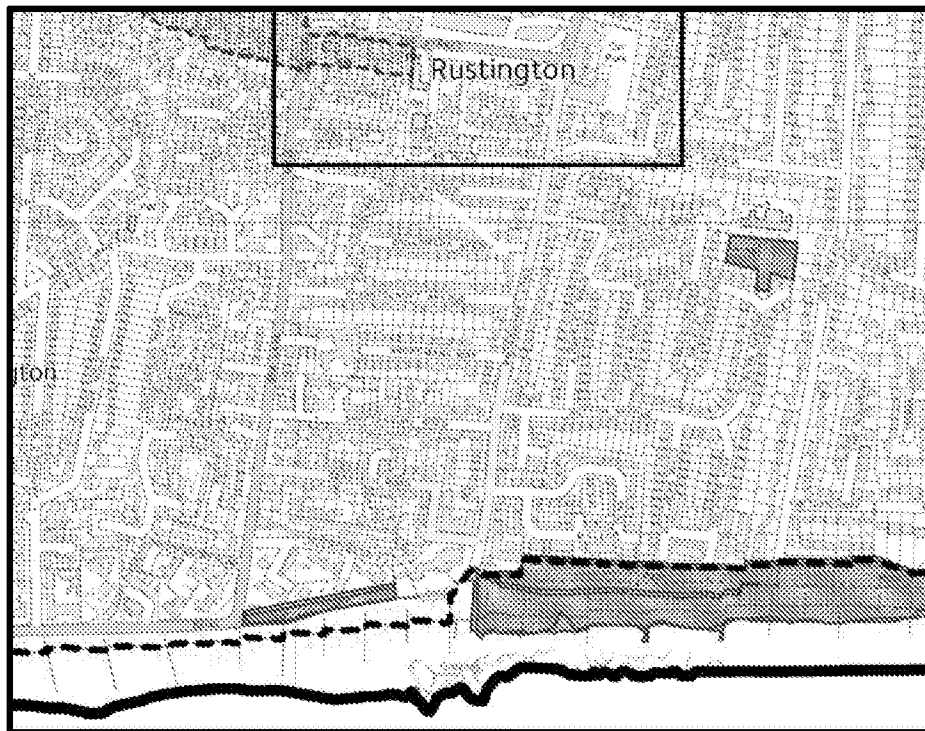
- 2.1 The site was previously operated as Rustington Manor Hotel and Restaurant (Lodwick's Restaurant and Bar) and provided a total of seven guest bedrooms, staff accommodation and a restaurant and bar that were formerly open to the public (total of 70 covers) when operational.
- 2.2 Consent was granted in 2024 for the conversion of the former Hotel into four new residential apartments (Use Class C3), in addition to the two existing residential dwellings within the site.



Existing Garage (centre right) and Former Hotel

- 2.3 The former hotel has been closed since the retirement of the previous owners in 2021 and the visual quality of the site has suffered as a result. The existing garage building includes prominent signage advertising the now former hotel and restaurant uses. This is now clearly redundant given the closure of the business and grant of planning permission for an alternative, residential use of the site.
- 2.4 The site is in a highly sustainable location with The Street just 300m to the north of the site. This parade of shops forms the main village centre for Rustington and hosts a wide range of convenience goods and services. The site is also a short walking distance (500m) from the seafront.
- 2.5 Shops selling essential goods are also available in close proximity to the site, including Waitrose (250m) and Tesco Express (350m). The site is

approximately 1km from Rustington Community Primary School and Georgian Gardens Community Primary School and is close to several pre-schools.



2018 Local Plan Policies Map showing Rustington Centre

- 2.6 The site is not within the Rustington Conservation Area and is not located close to any listed building or other heritage assets.
- 2.7 The immediate area around the site, along Broadmark Lane and adjoining roads is fairly mixed in architectural terms, with no unifying or uniform features. Most buildings within Broadmark Lane are larger detached properties when compared to properties in adjoining roads, particularly to the south of the application site.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The proposal is for the demolition of the existing garage building and erection of a new oak-framed car port. A new studio apartment (Use Class C3) is proposed within the roofspace above the car port.
- 3.2 The three car port spaces proposed meet the relevant geometry requirements within the Arun Parking Standards. A further four parking spaces are proposed within the parking area, alongside four further off-street parking spaces accessible from Broadmark Lane and the existing driveway accessible from Broadmark Avenue.
- 3.3 The proposals therefore offer a net increase of three parking spaces (when assessed against Arun Parking Standards), compared to the approved plans under the **R/49/24/PL** permission.
- 3.4 The new resident apartment proposed is a 1-bedroom, 1-person dwelling of 38m² (excluding areas with limited headroom), which exceeds the relevant nationally described space standard for a dwelling of this type.
- 3.5 The new dwelling will also benefit from a south-facing balcony of 3m² which meets the Council's Residential Outdoor Amenity and External Space Standards within section H.04 of the Arun Design Guide (2021).
- 3.6 As with the approved plans under application R/49/24/PL, permeable surfacing is proposed within the parking areas.
- 3.7 New tree and shrub planting is proposed along the verge with Broadmark Avenue alongside a new, replacement street sign – with details to be agreed with neighbours.

4.0 RELEVANT PLANNING POLICY

4.1 Relevant planning policy includes:

National Planning Policy Framework (NPPF)

- 4.2 The revised National Planning Policy Framework (NPPF) came into effect in December 2023 and is a material consideration in planning decisions. The Framework describes the overarching objectives, with sustainable development contributing towards net gains across economic, social and environmental objectives.
- 4.3 Paragraph 11 states that decision-makers should approve proposals that accord with an up-to-date development plan without delay.
- 4.4 Paragraph 60 states the Government's commitment to significantly boosting the supply of new homes.
- 4.5 Paragraph 92 promotes developments that are safe and accessible and promote social interaction and healthy lifestyles.
- 4.6 Paragraph 107 highlights the need for adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.
- 4.7 Paragraph 110 seeks to ensure that appropriate opportunities to promote sustainable transport modes, including active travel, are taken up.
- 4.8 Paragraph 111 states that planning applications should only be refused on highways grounds when the cumulative impact of development is severe.
- 4.9 Paragraphs 123 and 124 state that proposals should make efficient use of land, particularly on brownfield land, and deliver development that meets identified housing needs.
- 4.10 A revised version of the NPPF is anticipated before the end of the year, with draft text consulted on in Summer 2024.

Arun Local Plan 2011-2031

4.11 The Arun Local Plan was adopted in July 2018 and forms the main basis for determining planning applications in the district/local planning authority area.

4.12 Relevant Policies include:

SD SP1	Sustainable Development
SD SP2	Built-up Area Boundary
H SP1	The Housing Requirement
H DM1	Housing Mix
D SP1	Design
D DM1	Aspects of Form and Design Quality
D DM2	Internal space standards
ECC SP1	Adapting to Climate Change
T SP1	Transport and Development
W DM2	Flood Risk
W DM3	Sustainable Urban Drainage Systems

4.13 The Council are in the process of a Local Plan review/update and consulted upon their Regulation 18 version of the Plan between March and May 2024. The new Local Plan is at an early stage in the plan preparation process

Rustington Neighbourhood Plan

4.14 The Rustington Neighbourhood Plan 2014 – 2029 was ‘made’ (adopted) in 2015 and forms part of the adopted local development plan.

4.15 Relevant policies include:

Policy 2: Housing Design

Policy 4: Sustainable Drainage

4.16 The Neighbourhood Plan has not been updated since the adoption of the Arun Local Plan 2018 and therefore adopted Local Plan policies take precedence where there are conflicts between requirements.

Other Relevant Policies and Guidance

- 4.17 The Council have produced Supplementary Planning Guidance setting local Parking Standards for the District (2020).
- 4.18 The Council have also recently produced a detailed Arun District Design Guide SPD (2021) setting out the design guidance and expectations for all new developments. Specific guidance is referenced where relevant throughout this Statement.
- 4.19 The Rustington Village Design Statement (2010) divides the village into individual Character Areas and provides design guidance for each.

5.0 ASSESSMENT OF SCHEME

5.1 From the aforementioned planning policies, it can be seen that the main issues to consider in determining the application are:

- Principle of Development;
- Design and Visual Impact;
- Neighbouring Amenity;
- Quality of Accommodation;
- Transport; and
- Sustainable Drainage;

These are considered in greater detail below.

Principle of Development

5.2 The principle of residential development has already been accepted at the site under application reference **R/49/24/PL**. The proposed use as residential, alongside associated parking is unchanged from the approved use of the site.

5.3 The site is located in a sustainable location for an additional residential unit in central Rustington, within the built-up area boundary and close to local shops and services (including The Street), where development proposals are supported in principle under Local Plan Policy SD SP2 (Built Up Area Boundary).

5.4 The proposal is for the replacement of two low-quality garages that lie within a prominent location within the street and detract from the overall visual quality of the area.

5.5 Local and national policies also strongly support the delivery of increased densities on development sites where increases can be accommodated, as well as bringing existing buildings and previously developed land back into use. The National Planning Policy Framework provides strong supporting in principles for the effective use of land in meeting the need for new homes.

- 5.6 During adopted Local Plan seeks to deliver 1,000 new homes a year and is reliant on the delivery of additional 'windfall' sites to meet this full requirement. The Government's latest housing delivery test figures show that the district is currently only delivering 61% of its annual housing requirement, highlighting the need for increased delivery of new homes if the objectives of the adopted Plan are to be met.
- 5.7 The application proposals provide an opportunity to make an increased contribution to local housing needs, on a site already committed for new residential housing. The current application would improve the existing supply position through the delivery of another high quality new home.
- 5.8 The loss of the hotel use has already occurred and the principle of the change of use of the entire site has already been approved under the extant permission for the site. Compliance with Policy TOU DM1 of the adopted Local Plan does not need to be demonstrated further. Past attempts to market the property for a new visitor accommodation use have all been unsuccessful.
- 5.9 The application proposal will deliver a broader range of housing units compared to the approved planning consent. Although the existing planning permission delivers 2- and 3-bedroom apartments it would not deliver any one-bedroom units and none currently exist onsite. The application proposals will therefore enable a wider range of potential residents to access new housing.
- 5.10 Although Policy H DM1 (Housing Mix) primarily applies to major development, the proposals will still deliver a mix of housing that aligns well with the local area's identified housing needs. The increase in residential density proposed is appropriate for the site given the ability to deliver an additional unit alongside enhanced parking provision and with only a minor increase in the overall built footprint within the site. The proposals therefore also align with Policy D DM1 (Aspects of Form and Design Quality) of the Local Plan.
- 5.11 Rustington Neighbourhood Plan identifies specific local housing needs, and a particular need for smaller housing units – which forms a key component of the Neighbourhood Plan strategy. The delivery of an additional studio unit therefore better addresses these policy objectives and is compliant with local Neighbourhood Plan policies and Local Plan Policy H DM1 (Housing Mix).

- 5.12 Under Policy AH SP2 (Affordable Housing) there is no requirement for an affordable housing contribution on developments of less than 11 units and therefore the additional delivery of one unit will not impact on the relevant requirements for affordable housing either alone or in-combination with the extant permission.
- 5.13 The paragraphs below consider in detail the proposed development and its compliance with relevant national and local planning policies. There are no significant impacts of the scheme that would prevent the grant of planning permission.

Design and Visual Impact

- 5.14 The proposal seeks to remove a low quality, flat-roofed garage building that forms an unsympathetic and prominent feature within the streetscene. The proposal would replace this building with an oak-framed open car port under a pitched clay tile roof.
- 5.15 The application is considered to deliver a net visual improvement to the site. As a result of the demolition of the existing building, large signage advertising the (now closed) hotel restaurant would also be removed.
- 5.16 There is no prevailing architectural style along Broadmark Lane, with a mix of house types and materials throughout the streetscene. However, the proposed new building would relate to the existing building sympathetically by incorporating consistent materials with the main building through the use of brick, timber and clay tiles, and featuring a front gable that forms a repeated design feature both within the site and along the street.
- 5.17 Policy D SP1 (Design) of the Arun Local Plan promotes the efficient use of land and for new developments to reflect the characteristics of the site and local area. The proposals will replace an existing building and incorporate the delivery of an additional new home on a residential development site within a sustainable location.

- 5.18 The other existing buildings and the approved residential layout under planning permission **R/49/24/PL** will remain the same, including the use of permeable surfacing and creation of additional parking spaces.
- 5.19 Both existing and proposed buildings sit forward of the existing building line for the main building. The new building will feature a larger footprint to accommodate both the current requirements for parking space dimensions to suit modern vehicles (as prescribed by the Arun Parking Standards) and the delivery of an additional coverage parking space. The increase in footprint is considered to be justified on the basis of the significantly improved contribution the building will make to the streetscene. The delivery of an additional new home also weighs in favour of the proposal in the overall planning balance.
- 5.20 The new building would be 1.5-storeys in height and physically subservient to the main building. As a car port, the presence of the building closer to the public highway and site access would not be unconventional or visually incongruous.
- 5.21 The three parking spaces proposed within the new building will be open-sided car port spaces to ensure these are used for off-street parking and not other uses unrelated to the residential use of the wider site.
- 5.22 Similar development proposals have been approved within the surrounding area, including application **R/180/22/HH** at Elm Farm on The Street. Officers considered that proposal to be suitable in scale and materials, which included a brick plinth, oak-frame and slate tile roof.



Approved and completed garage at Elm Farm, The Street

- 5.23 The Rustington Neighbourhood Plan seeks to support development proposals that reflect the scale, density, massing, height, landscape design, layout and materials of the surrounding area. The proposal is in keeping with the scale, height and layout of the surrounding area.
- 5.24 The Rustington Village Design Statement identifies design guidelines for development proposals. The application site is within one of three areas defined as Character Area 7, which are characterised by pre-war housing. The site is within the 'southern area', and this area is noted as being "*relatively higher density*" than the other two areas within Character Area 7. The Planning Guidelines within the Village Design Statement acknowledge that the buildings within the area are "*very mixed*". The proposed conversion would maintain the existing character and would not have a material impact on the wider neighbourhood.
- 5.25 In addition to the visual improvement from the replacement building, the proposals also incorporate additional planting along the northern boundary of the site, which forms the verge to Broadmark Avenue, as well a replacement road sign in the same location.
- 5.26 The proposals therefore accord with all relevant design policies, as well as more detailed design guidance within the Village Design Statement and Arun Design Guide SPD.

Neighbouring Amenity

- 5.27 Neighbourhood Plan Policy 2 sets out design principles for development proposals. It states that development should "*not impact on surrounding properties but should seek to maintain privacy and alleviate possible noise issues to existing neighbouring properties*".
- 5.28 The one-person occupation of the new dwelling on a site already granted planning permission for residential uses will be compatible with the approved uses within the site and the surrounding residential area. The activities associated with the normal residential occupation of the dwelling will have a negligible impact on neighbours.

- 5.29 Therefore, no material adverse neighbouring amenity impacts would arise from the application proposals and relevant local policies would be satisfied, including Neighbourhood Plan Policy 2 and Local Plan Policy D DM1 (Aspects of Form and Design Quality).

Quality of the Proposed Accommodation

- 5.30 The proposed new dwelling exceeds the relevant minimum floor space requirement for a one-bedroom, one-person studio unit (with shower) as set out in nationally described space standards guidance.
- 5.31 The new flat has a dedicated cupboard for storage and services and would benefit from onsite parking.
- 5.32 The proposal therefore meets the requirements of Local Plan Policy D DM2 (Internal space standards) and Section J.08 (Internal Space Standards) of the Arun Design Guide SPD.
- 5.33 The proposed studio unit would be dual aspect and the proposed balcony space will be south-facing, providing the advantage of offering full sun and natural daylighting for residents.
- 5.34 The Arun Design Guide supports the incorporation of private outdoor spaces and requires a minimum external area of 3m² for residential balconies. This standard has been met accordingly. The proposals therefore reflect adopted guidance at Section H.04 (Residential Outdoor Amenity & External Spaces) of the Arun Design Guide SPD.
- 5.35 The proposed new home is therefore designed in accordance with all relevant local and national design standards and will provide a high quality new home for its future resident/s.

Transport and Parking

- 5.36 The proposed development results in the net addition of a single one-bedroom, one-person studio unit and may have a negligible impact on transport and highways.
- 5.37 However, the proposal does result in an increase to the overall parking demand calculation under the Arun Parking Standards.
- 5.38 Arun Parking Standards SPD (2020) sets alternative parking standards for new developments in Arun district. The site is located within Parking Zone 4 for the purpose of these standards.
- 5.39 Onsite parking is broadly provided in the same locations as existing, approved parking. The approved plans currently deliver four parking spaces within this parking area, alongside the retention of two garages that do not meet the minimum dimensions needed to be counted as parking spaces under the Arun Parking Standards SPD. In comparison, the application proposals would deliver three compliant covered parking spaces alongside the re-provision of the four approved parking bays.
- 5.40 When assessed against the expected level of provision for new residential developments, the proposed new homes under both this application and the approved application (**R/49/24/PL**) generate a parking requirement of seven spaces plus visitor parking. A total of seven parking spaces are delivered within this parking area, plus a further four off-street parking spaces adjacent to Broadmark Lane.
- 5.41 Further parking is also available for the existing dwellings at 1A Broadmark Avenue via the existing and established driveway and will be retained for this purpose only.
- 5.42 The Arun Parking Standards SPD also identify an existing parking demand of two spaces for the retained residential units. To ensure that there is no underprovision of parking for existing residents, two parking spaces are provided for this purpose.

- 5.43 On this basis, the residential parking demand of the new units totals seven parking spaces, plus two spaces for the existing apartments and a further two spaces for visitor parking. Consistent with this, the Arun Parking Standards SPD identifies a total residential parking requirement of 10.8 spaces (rounded up to 11).
- 5.44 Even with the existing residential driveway only counted as a single parking bay, the proposed parking provision would deliver at least twelve spaces – in excess of the total parking demand identified under the Arun Parking Standards SPD (2020).
- 5.45 The SPD also specifies recommended cycle parking provision and provides a standard of 1 space per unit for all flat sizes. A total of ten cycle parking spaces were to be provided within the approved development, significantly exceeding the minimum cycle parking standards for five new residential apartments within the SPD.
- 5.46 Local and national planning policies also seek to maximise opportunities for active travel and promote the use of sustainable forms of transport. Principle 4 of the Arun Parking Standards SPD (2020) underlines the importance of promoting lower levels of car ownership.
- 5.47 Whilst the development proposed adequately provides for expected levels of car ownership, the parking provision proposed is not excessive and will deter unnecessary levels of car ownership, given the sustainable location of the site close to local services.
- 5.48 The proposed parking spaces are to be provided with active EV charging facilities in accordance with current Building Regulation requirements.
- 5.49 Parking provision is therefore considered to be appropriate to the scale of development and complies with Local Plan Policy T SP1 (Transport and Development), which seeks appropriate provision of parking, consideration of the impact of new developments on on-street parking demand and supports proposals that reduce the need for travel by private car.
- 5.50 Given the close proximity to local services the new home created would also be in easy walking distance to a wide range of local services, shops and

facilities and would minimise reliance on private car use in accordance with the objectives of national planning policies and the Local Plan (Policy T SP1).

Flood Risk and Drainage

- 5.51 The application site is in Flood Zone 1 and is therefore not considered to be at risk from flooding. The Government's Flood Risk Information service also shows that the flood risk for surface water flooding is also low and that the area is not at risk of flooding from reservoirs.
- 5.52 Permeable parking areas are proposed throughout the site in accordance with Policy 4 (Sustainable Drainage) of the Rustington Neighbourhood Plan, and new planting will further improve natural drainage and reduce runoff rates
- 5.53 On this basis, the site is not at risk of flooding and drainage improvements can be delivered within the site to improve the management of surface water as part of the development. The proposals therefore meet the requirements of Policy W DM2 (Flood Risk) and Policy ECC SP1 (Adapting to Climate Change) of the Local Plan.

Ecology and Habitats

- 5.54 The site is not subject to any ecological designation and there are no known designated sites within 2km. The habitats on the site are common and widespread and considered to have fairly low ecological value where these do occur.
- 5.55 Existing areas of landscaping and planting will be retained as part of the proposed development and therefore any impacts from the proposed conversion works on existing wildlife would be negligible. Additional tree and shrub planting is proposed and will improve the overall biodiversity value of the site.

- 5.56 On this basis, the development can deliver ecological enhancements that can be incorporated into the proposed development, with full details secured by condition.
- 5.57 The works primarily affect an area of existing hardstanding within the site and do not impact upon more than 25m² of habitat (or 5m of linear habitats). As a result, the proposals meet the 'de minimis' exemption under biodiversity net gain provisions but nonetheless provide a clear improvement to the overall biodiversity value of the site through the proposed planting.

6.0 CONCLUSIONS

- 6.1 The proposed development would replace a low quality building with a replacement of improved design merit whilst also delivering an additional new one-bedroom home in a sustainable location within Rustington.
- 6.2 The application follows the approved change of use of the main building within the site from hotel to residential (four apartments) and would complement the approved development and deliver additional parking for all residents.
- 6.3 The design and materials of the new building are appropriate for the character of the area and the delivery of additional new planting and signage will provide a net visual benefit for future residents and public amenity.
- 6.3 The amenities of neighbouring residents will be preserved and the design mitigates effectively against any potential impacts. Appropriate provision has been made for external amenity space.
- 6.4 The benefits of an additional new home on brownfield land is a significant benefit given the existing housing supply/delivery position within Arun district and there are no disadvantages that would significantly and demonstrably outweigh this benefit.
- 6.5 In the light of the above, the local planning authority is respectfully requested to approve the application and grant planning permission.

Lewis & Co Planning

November 2024