Lewis & Co Planning
town planning consultants

Planning Application by Mr Leach

Site at 69 Broadmark Lane, Rustington, West Sussex BN16 2HL

Planning Supporting Statement

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1.0 INTRODUCTION

1.1 This statement is submitted in support of the application for planning permission at 69 Broadmark Lane in Rustington for the demolition of the existing buildings on the site and the erection of a new building containing five 2-bedroomed flats and one 3-bedroomed flat.

1.2 The land on the site which surrounds the building will be landscaped to a high standard to provide private gardens and a communal garden/drying area.

1.3 The application site comprises a substantial and rambling former nursing home which was last in use as a mix of HMO and self contained residential accommodation. This use does not have planning permission.

Aerial photo showing the site edged red and the wider surroundings.

1.4 The application comprises the application fee and the following documents:

- Application Forms
- Application plans by Roberts and Wrigley Architects.
- Planning Statement by Lewis and Co Planning
- Design and Access Statement by Roberts and Wrigley Architects

1.5 This planning statement demonstrates that the proposed development should be approved in line with the presumption in favour of sustainable development enshrined within national planning policy. The scheme will improve the appearance of the built form and streetscape of the area, result in the provision of high quality and much needed 2 and 3 bedroom housing units.

1.6 The Council cannot demonstrate a five-year supply of deliverable housing sites. Given such a shortfall in housing land supply, all local planning policies that relate to the supply of housing must be considered “out of date” – and under such circumstances, permission should be granted unless there are disadvantages to the scheme that **significantly** and **demonstrably** outweigh the benefits of providing much needed housing land and visual improvement to the area. There are no such disadvantages.

1.7 All images and planning drawing extracts reproduced in this statement are provided by Roberts and Wrigley Architects.

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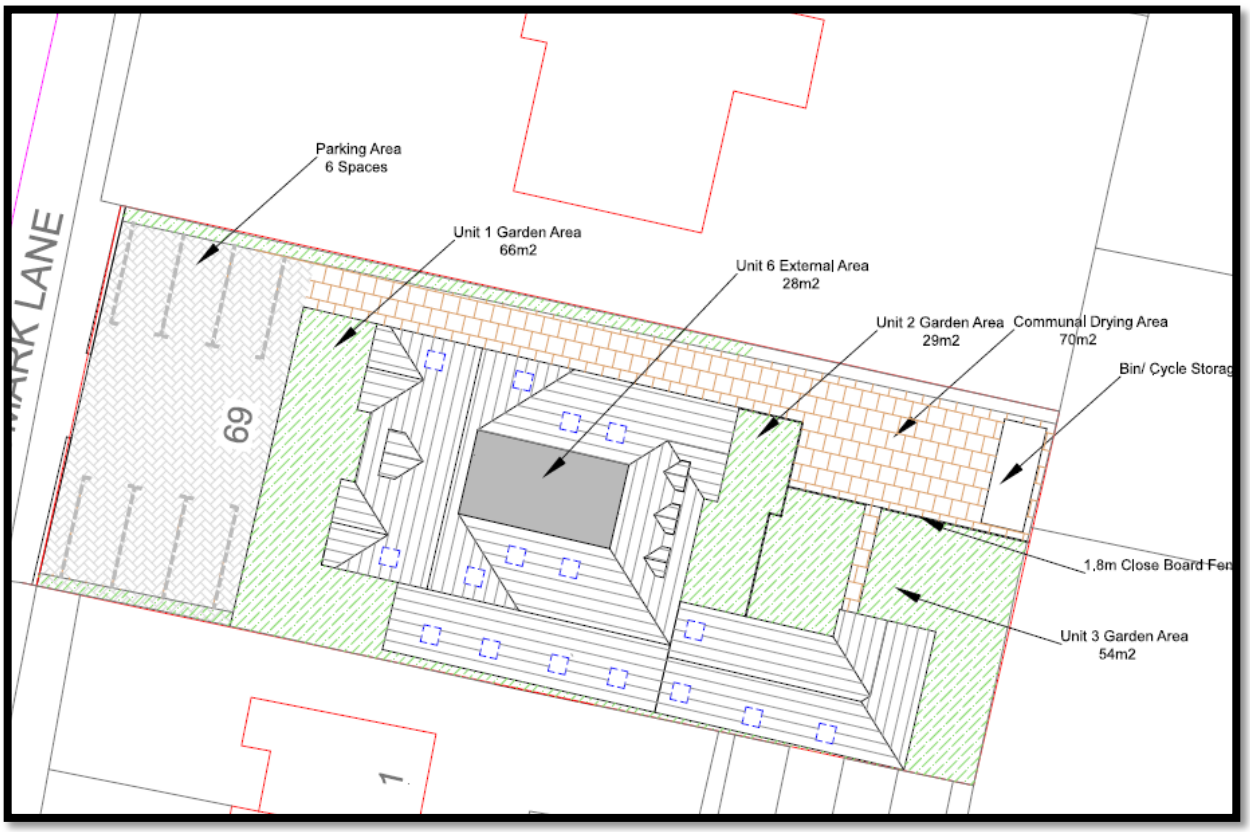
2.0 THE PROPOSED DEVELOPMENT

2.1 The proposed development can be broken down into two constituent parts:

- Demolition of the existing building and outbuildings at 69 Broadmark Lane
- Construction of a new building on the site - providing for five 2-bedroomed flats and one 3-bedroomed flat.

2.2 These parts combine to provide a scheme that will result in a well designed building which makes efficient use of this brownfield site for the provision of much needed and high quality housing.



Site plan showing layout of the proposed development

2.3 The new building will be a total of 3 storeys high (including the accommodation in the roof space). This is comparable to the existing building on the site which is also three storeys (including roof accommodation). The single storey east wing projects into the rear garden and will replace the existing rear single storey extension to provide a self contained flat with private garden. Parking will be provided to the front of the site and cycle parking and bin storage at the rear.

Proposed West Elevation in context (Looking at the site from Broadmark Lane)

2.4 The foot print of the proposed building is comparable in terms of site coverage to the footprint of the buildings which it will replace. The main difference being the proposed building will be sited slightly further west to move the eastern wing off of the shared boundary with the properties in Amberley Road.

Layout plan showing the existing and proposed footprints

2.5 The organisation of the building and its layout and massing are described in detail in the Design and Access Statement.

3.0 RELEVANT PLANNING POLICY

3.1 Relevant planning policy includes the saved policies of the Arun District Local Plan 2003 and the National Planning Policy Framework.

Arun District Local Plan

3.2 With regard to the Local Plan, the following Local Plan policies are considered relevant (though the degree of weight that can be attached to them should be reflected in their conformity with National Planning Policy, and the Council's housing supply issues).

POLICY GEN7 The Form of New Development

Planning permission will only be granted for schemes displaying high quality design and layout. Development proposals involving new buildings or significant extensions or alterations must be accompanied by an illustrated written analysis of the site and its immediate setting, together with its relationship with the relevant townscape, landscape, wildlife and movement characteristics of the wider area.

Development will be permitted provided it:

(i) makes efficient use of land or buildings and, in the case of new residential development, achieves net densities of at least 30 dwellings per hectare;

(ii) demonstrates that it responds positively to the identified characteristics and resources of the site and the area to create attractive places and spaces with the needs of people in mind and respects and enhances local distinctiveness;

(iii) promotes sustainable development, including the effective use and conservation of energy and reducing the need to travel, particularly by private car;

(iv) does not have an unacceptable adverse impact on adjoining occupiers, land, uses or property and, where relevant, facilitates the development of adjoining sites;

(v) takes account of any unacceptable adverse impacts that may arise from adjoining land uses or property;

(vi) retains significant open or wooded areas which, in their own right, make a material contribution to the local environment;

(vii) allows for the safe movement of pedestrians and vehicles, giving priority to pedestrians;

(viii) provides for vehicle parking in accordance with Policy GEN12 and Appendix 2 and open space in accordance with Policy GEN20.

In all cases, the District Council will expect a high standard of design and layout and all applicants will be encouraged to improve the visual amenities of the particular locality in scale, external appearance, hard and soft landscaping and materials.

Reason

To protect and enhance the quality of the environment.

POLICY GEN12 Parking in New Development

The Local Planning Authority will base its consideration of the need for on-site parking provision on its parking standards contained within this Plan. Provision of parking in excess of these standards will not be allowed.

The Local Planning Authority may seek a lower provision than required by the standards for developments proposed in town centres and other areas accessible by other means of transport. In considering the extent of reduced on-site parking provision, the Council will have regard to environmental and highway safety issues, together with the following factors:-

(i) the availability, type and proximity of public parking;

(ii) the availability of alternative means of transport;

(iii) potential highway safety problems;

(iv) potential environmental harm arising from parking demand being met elsewhere;

(v) the extent and nature of parking restrictions in force on highways in the vicinity;

(vi) the scale of development proposed; and

(vii) the suitability of "specific use" and "personal" conditions attached to planning permissions.

Reason

To ensure that appropriate parking provision is made within new development.

STANDARDS OF PARKING PROVISION FOR RESIDENTIAL DEVELOPMENT

Table 2 : Flats, Bedsitters and Hostels

Dwelling Type	Specific Requirements	Total C Parking Provision
Flat with 3 or more habitab rooms	1 CAR SPACE and 0.7 SPACE FC VISITORS AND SERVICE VEHICLE (to be provided within the layout near	1.7

	dwellings)	
Flats and Bedsitters with or less habitable room (not restricted to the elderly)	1 CAR SPACE and 0.2 CAR SPACE FO VISITORS AND SERVICE VEHICLE (to be provided within the layout near dwellings)	1.2
Hostels for Students	1 CAR SPACE FOR RESIDENTS AT TH RATIO OF 1 SPACE FOR EVERY RESIDENTS 1 CAR SPACE FOR VISITORS AT TH RATIO OF 1 SPACE FOR EVERY 2 RESIDENTS SPACES FOR SERVICE VEHICLES A REQUIRED	
Houses in Multiple Occupatic	0.5 CAR SPACE PER ROOM/UNIT	0.5

These standards represent the maximum provision for parking

Emerging Local Plan

3.3 Emerging Plan policies carry weight within the development control process, but the amount of weight that can be attached to specific parts of any emerging policy has to be adjusted to reflect whether or not there are outstanding or /unresolved objections.

3.4 There are no policies in the emerging local plan that are considered to attract significant weight. This is primarily due to the early stage of the plan in the preparation process.

3.5 The following policies have been identified by the LPA as relevant in their pre-application advice to the applicant. The amount of weight that can be given to these policies is less than significant given their early stage in the adoption process. At the time of writing these policies have been agreed by the Council but have not been subject to an Examination In Public or formal adoption.

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Policy D DM1

Aspects of form and design quality
When considering any application for development the Council will have regard to the following aspects:

1. Character
Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.

2. Appearance/attractiveness

Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping.

3. Impact
Have minimal impact to users and occupiers of nearby property and land. For example, avoiding the loss of sunlight/over-shadowing, over-looking issues, loss of privacy, anti-social noise/disturbance or having an over-bearing presence.

4. Innovation
Raise standards of design by embracing innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

5. Adaptability
Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

6. Crime prevention
Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'New Homes 2010 - Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.

7.Trees and woodland
All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

8. Solar gain
Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

9. Public realm
Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

10. Layout - movement
Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept. The layout of a development scheme should be designed to encourage these sustainable modes of transport whilst also designing in vehicular movements as well.

11. Layout - legibility
Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

12. Public art
Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures. Such cultural interventions have often been realised in response to creatively engaging a community's sense of 'place' or 'well-being' in society. Public art will be encouraged as an integral element of development schemes.

13.Density
The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

14. Scale
The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.
Developers will be expected to prepare development briefs for strategic and other large sites identified by the Council, in consultation with communities and relevant bodies. Each brief will provide criteria and principles for development. Development briefs will be a material consideration in planning applications and will inform pre-application discussions.
Developments with respect to all of the above shall also be consistent with all other Local Plan policies.

Policy D DM2
Internal space standards
The planning authority will require internal spaces to be of an appropriate size to meet the requirements of all occupants and their changing needs. District specific standards are to be identified for inclusion in this Policy which should be adhered to in all new development. Further information will be provided in the emerging Arun District Council Design Guide. The table below outlines current best practice.

Developments shall also be consistent with all other Local Plan policies.

	Dwelling type (bedroom / persons)	Essential GIA (General Internal floor Area) [sq.m]	Kitchen [sq.m]	Dining [sq.m] Dining Area = DA	Living [sq.m]	Combined Kitchen / Living / Dining [sq.m]	Double [sq.m]	Twin [sq.m]	Single [sq.m]	Bathroom [sq.m](26)	Storage / Utility [sq.m](27)
Single storey dwelling	1b1p	-	6.2	9.4, DA 3.2	12	21	-	-	8	3.6	1
	1b2p	50	6.8	10.4, DA 3.6	13	23	12	-	-	4.4	1.5
	2b3p	61	7.5	11.2, DA 3.6	14	25	12		8	4.4 + 2.7	2
	2b4p	70	7.5	12, DA 4.5	14.8	27	12	12	-	4.4 + 2.7	2.5
	3b4p	74	-	-	-	-	-	-	-	-	-
	3b5p	86	8.3	12.8, DA 4.5	16	29	12	12	8	6.8 + 3.6	3
	3b6p	95	-	-	-	-	-	-	-	-	-
	4b5p	90	-	-	-	-	-	-	-	-	-

Policy D DM3

External space standards

The Planning Authority will require the provision of useable private amenity space (excluding parking and turning areas) in new residential development unless the urban density form in town centres requires greater flexibility. In considering the amount of amenity space, the planning authority will take into account back gardens, roof terraces, balconies and, in apartment developments, communal gardens.

Apartment developments will be expected to meet (or exceed) the following standards:

Number of bedrooms	Minimum depth (m) of balconies	Minimum area (sq.m) of private outdoor space per apartment (balcony, roof garden, ground level patio or open space directly connected to the apartment)
2 bedrooms	1.5m	5m
3 bedrooms	1.5m	6m
4 bedrooms	1.5m	7m
5 bedrooms	1.5m	8m
6 bedrooms	1.5m	9m

National Planning Policy Framework

3.6 The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications. The following paragraphs are particularly relevant to the determination of the current application.

Paragraph 14: States that where the development plan is absent, silent or relevant policies are out of date, the presumption in favour of sustainable development means that planning permission should be granted unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies” in the Framework taken as

a whole, or if there are specific policies within the Framework which dictate otherwise.

Paragraph 17: States that planning should proactively drive and support sustainable economic development. States that planning should seek to secure high standards of design and amenity.

Paragraph 19: States that "significant weight" should be placed on the need to support economic growth through the planning system (Economic growth includes all types of development).

Paragraph 32: Planning applications should only be refused on highways grounds when the cumulative impact of development is severe.

Paragraph 49: Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five year supply of deliverable sites.

Paragraph 56 to Paragraph 66: Set out in more detail the Government's design values – encouraging good design that improves the character and quality of an area and the way it functions.

Paragraph 187: Advises that decision takers at every level should seek to approve applications for sustainable development.

Paragraph 188: Encourages pre-application discussions

Paragraph 196: The National Planning Policy Framework is a material consideration in the determination of planning applications.

Paragraph 215: After 12 months from the date of publication of the National Planning Policy Framework (that is to say after 27 March 2013), the weight given to Local Plan policies should be assessed with regard to their degree of consistency with the Framework.

Paragraph 216: The weight given to emerging planning policy should be assessed with regard to the extent of which there are unresolved objections and the consistency of such policies with the NPPF.

4.0 ASSESSMENT OF THE SCHEME

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

- The principle of development
- Visual Impact
- Neighbour Impact
- Quality of the Proposed Accommodation
- Planning Obligations
- Highways Issues
- Sustainability
- Planning Obligations

These are considered in greater detail below.

Principle of Development

4.2 The principle of a residential redevelopment of the site is acceptable. Site is within the development boundary and is not subject to any protection or restriction which precludes residential development. The site currently accommodates a large single former dwellinghouse (latterly a care home) dating from the mid 20th Century which makes very inefficient use of the site and does not meet modern energy efficiency or lifetimes homes standards. Planning permission was granted in 2008 for the redevelopment of the site to provide for 6 new apartments, as such the principle of redeveloping the site for 6 residential units is well established under the current adopted local plan policies which remain the Development plan for the District.

4.3 The Council's adopted and emerging planning policies support this type of application where the re-development makes efficient use of the site, to a high standard of sustainability and helps to meet the needs of the district's housing shortage.

4.4 In the light of the above, it can be seen that the principle of development along the lines of the current application proposals are in compliance with the adopted and emerging local plan polices and the Framework.

Visual Impact

4.5 The visual impact of the proposed development is the subject of detailed analysis in the design and access statement and drawings produced by the Architects.

4.6 This demonstrates that from surrounding viewpoints, the proposed development will have a positive visual impact on the street scene and in particular is of a scale,

form and materials that is acceptable with regard to the site's location and the prevailing character of the locality and surrounding development. The design of the proposed development will result in a scheme of cohesive appearance – with good levels of articulation, high quality materials and visual interest to the building.

Above: Existing front elevation of 69 Broadmark Lane

Above: Proposed front elevation of 69 Broadmark Lane (height of existing building is shown by dashed red line).

4.7 The scheme proposes to move the bulk of the building forward in the plot. This serves two purposes, firstly to position the front elevation midway between the buildings either side in terms of setback from the highway; and secondly, to bring the development away from the rear boundary to the benefit of the neighbouring properties to the rear.

4.8 As the scheme is well designed and will have a positive impact on the character and appearance of the area, the scheme is in accordance with Adopted Local Plan policy GEN7, emerging policy DDM1 and the relevant paragraphs of the National Planning Policy Framework.

Neighbour Impact

4.8 The scheme will preserve the amenities of neighbouring residential occupiers. The immediately adjoining residential properties to the east and north will not suffer from an unreasonable increase in overshadowing or loss of sunlight.

4.9 The distance of the proposed building's windows to the boundary and their orientation has been devised to ensure that no unreasonable overlooking of the private windows or gardens will arise.

4.10 The scheme has been designed to minimise overlooking to properties through the orientation of windows.

4.11 The proposed development would not give rise to an unacceptable increase in noise and disturbance from the proposed residential use. The site is in a fairly busy suburban location and the resulting level of activity from the 6 units proposed would not be unusual for this type of location.

4.12 The proposed development will preserve the amenities of neighbouring residents and future occupiers of the building and so accords with the provisions of local plan policy GEN7 (iv).

Quality of Proposed Accommodation

4.13 The proposed flats provide for a high standard of accommodation, with all units benefiting from outside amenity space and all being designed to a generous floorspace provision. The floorspace amount and external space size for each unit is shown in the attached spreadsheet in **APPENDIX 1** to this statement

4.14 Emerging policy DDM2 sets out detailed requirements for the internal areas, and room sizes for new developments. These standards are met or exceeded in every case apart from unit 5 where the two bedrooms are respectively 13.5% and 12.5% smaller than the draft policy requires. However, the overall floorspace of the flat exceeds the minimum standard and by providing en-suite shower rooms to each bedroom and a utility room off the kitchen, a very high standard of overall accommodation is provided.

4.15 Emerging policy DDM3 sets out detailed requirements for external space standards for flats and apartments. These standards are comfortably exceeded by all of the proposed units except unit 4 which does not benefit from private amenity space. However, this unit has access to a 70sqm shared outside space which will provide some amenity for the occupiers.

4.16 The scheme will provide for a high standard of accommodation internally and externally and so complies with adopted Local Plan Policy GEN7. While the detailed requirements of the Emerging Policies are only partially met, these are draft policies and the weight that can be attributed to them is limited. On balance,

and considering the overriding presumption in favour of development required by the Framework, it is considered that the proposed standard of accommodation is acceptable.

Highways Issues

4.17 The scheme provides for off street parking and cycle parking in accordance with the Council's maximum and minimum standards. The scheme is therefore acceptable with regard to local plan policy GEN12 and paragraph 32 of the Framework.

4.18 The site is located in a highly accessible location with regard to access to services and public transport. The village centre at the junction of Broadmark Lane and The Street is within easy walking distance of the site and provides a range of shops and services.

4.19 Local Public transport includes bus services (700 and 9) which connect locally and to Worthing, Littlehampton and Brighton. Angmering mainline railway station is a short distance from the application site.

Planning Obligations

4.28 Should the Local Planning Authority consider that a legal agreement is required to secure any infrastructure contributions (for example towards affordable housing in the district) to meet the needs arising from the development then the applicant would welcome the opportunity to discuss the level and the need for such contributions at the earliest opportunity. These are all matters that could be controlled through a Section 106 agreement.

4.29 Subject to the above, the scheme therefore complies with Draft Local Plan policy DEV17.

Continues overleaf.....>

5.0 CONCLUSIONS

5.1 The scheme proposes a residential re-development of an existing residential site. In total 6 units of residential units would be provided.

5.2 The scheme is well designed and the proposed height of building is appropriate given the site's location and the surrounding street scene and development . The amenities of neighbouring residents will be preserved.

5.3 The scheme will result in the provision of high quality and much needed housing in a sustainable location close to shops, recreation and local services.

5.4 The Council is unable to demonstrate an up-to-date five year supply of deliverable housing sites. Under such circumstances planning policies that affect the supply of housing must be considered out-of-date (see paragraph 49 of the National Planning Policy Framework), and the presumption in favour of sustainable development applies (also paragraph 49).

5.5 The presumption in favour of sustainable development (paragraph 14 of the NPPF) states that sustainable development should be allowed unless the disadvantages of the scheme **significantly** and **demonstrably** outweigh the benefits of the scheme.

5.7 The benefits of the scheme are significant: a well designed building which complements the appearance of the area, investment and economic activity and the provision of residential units. There are no disadvantages that would significantly and demonstrably outweigh these benefits.

5.8 In the light of the above, the local planning authority is respectfully requested to grant planning permission without delay.

Lewis & Co Planning
October 2014