



Design & Access Statement

PROPOSAL:

ERECTION OF 3 X 2-BEDROOM DETACHED BUNGALOWS WITH INTEGRAL GARAGES.

CREATION OF 3 VEHICULAR CROSSOVERS ONTO FIRCROFT CRESCENT.

SITE

CROFT WORKS, 52 MILL LANE, RUSTINGTON, W SUSSEX BN16 3JN

APPLICANT:

MJH DEVELOPMENTS LIMITED

Location & Description of Application Site

The Croft Works comprises a commercial site of three single storey buildings arranged around the external boundaries of the site. These buildings are used for a variety of storage uses.

Outside of the footprint of the buildings, the site is a concrete yard on which further open storage has historically taken place.

Currently, access to the site is via Mill Lane, an unadopted road running to the west of the site. There is a driveway into the site between Nos.50 and 54 Mill Lane. The site is effectively a property that lies between Nos.21 and 29 Fircroft Crescent. A 1.8metre high blockwork wall currently forms the boundary to Fircroft Crescent. At present, the site does not have vehicular access off Fircroft Crescent.

Below are internal photographs of the site illustrating the existing storage buildings and concrete yard.





Figure 1 – Various internal photographs of the existing storage buildings

It can be seen from these photographs that the site has a dilapidated and untidy appearance. The site is either covered by building footprint or concrete yard.

In order to place the site within its context, reproduced below and overleaf are aerial photographs.

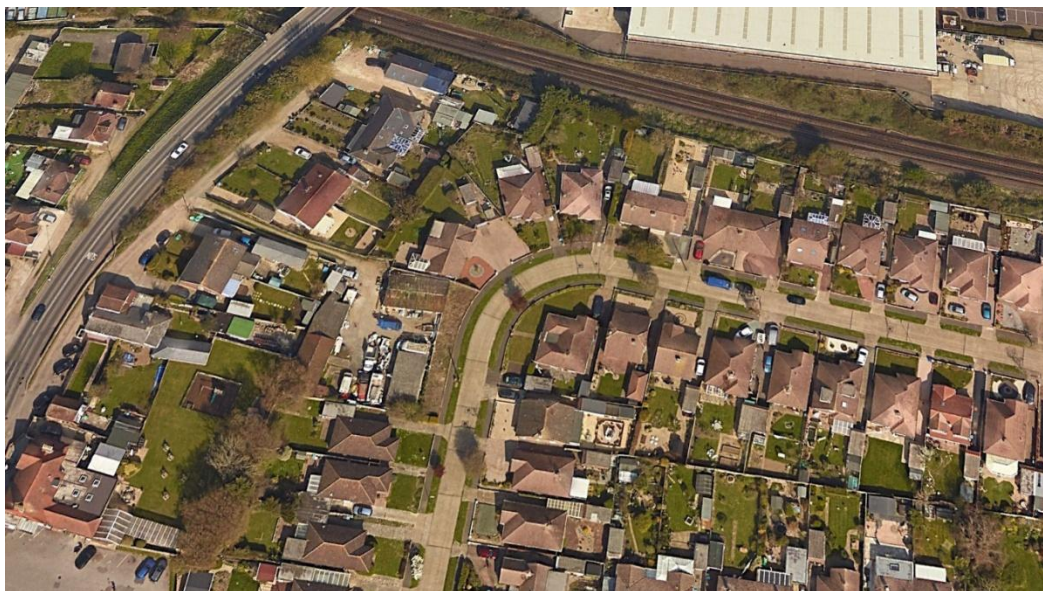


Figure 2 – Aerial photograph of site placing it in context



Figure 3 – Close up aerial photograph of application site

Figure 2 demonstrates that the predominant character of the application site is residential. Existing development comprises housing from the early post-War period. Housing in Mill Lane is predominantly two-storey and has a mix of styles and designs.

Fircroft Crescent is characterised by bungalow development that probably dates from the late 1950s/early 1960s. There are a mix of detached and semi-detached bungalows. Fircroft Crescent has a strong suburban, residential character. Overleaf are street scene photographs taken within Fircroft Crescent. One such photograph shows the Fircroft Crescent frontage of the application site.



Figure 4 – Photographs of street scene within Fircroft Crescent showing typical bungalow house development and the frontage of the application site

Fircroft Crescent is a lightly trafficked, loop road which experiences minimal on-street parking.

The site is generally flat and has a site area (excluding the Mill Lane access road) of 0.12 hectares.

It contains no landscape features of any significance. There is a mature hornbeam tree off-site to the southwest corner. Plot 3, the nearest proposed bungalow to this tree, would not be within its Root Protection Area.

Relevant Planning History

Under application ref. R/197/20/OUT planning consent was granted at appeal for the demolition of the existing storage buildings and the erection of two x 3-bed chalet bungalows with associated car barns. This would be an outline approval dated the 4th October 2021.

Whilst the consent therefore has lapsed, it is nonetheless a relatively recent permission which should carry significant weight in the consideration of this application. Attached within **Appendix A** is a copy of this appeal decision.

Reproduced below is the layout plan which accompanied this application.



Figure 5 – Approved layout plan for application ref. R/197/20/OUT

Reference to **Figure 5** demonstrates that the previously approved layout relied on the Mill Lane access drive. The two proposed houses were turned through 90 degrees in relation to development Fircroft Crescent. At this time, access off Fircroft Crescent was not possible as there was a grass verge between the road and the site that was in third party ownership.

The applicants, in this instance, have successfully purchased this grass verge thereby enabling the site to be replanned.

The appeal decision rested largely on matters relating to access with the Council and other third parties preferring the site to be re-developed with access via Fircroft Crescent.

The Proposal

Detailed planning consent is hereby sought for 3 x 2 bed bungalows fronting onto Fircroft Crescent. Each bungalow would have an integral garage with individual crossover and driveway from Fircroft Crescent.

The Mill Lane access drive has been omitted from the proposal as it is no longer required to service the application site.

The bungalows are modestly proportioned properties designed with a fully hipped roof and small gable projections on the front and rear. Reproduced below is a CGI render of how the bungalows would look between Nos. 21 to 29 Fircroft Crescent.



Figure 6 – CGI render of street elevation of proposed bungalows

Each of the three properties would have a variation on materials for the front elevation walls. There would be a mix of flint panelling and brick quoins, stone quoins and brick and brick quoins and render. A red plain tile is proposed to the gable element and a dark plain tile for the roof. A Material Schedule is submitted with the application.

Each of the bungalows would have a pedestrian garden access down one side of the property. A permeable gravel finish is proposed to the driveway. A lawned front garden area is proposed which will be defined by laurel hedging.

The houses would accord broadly with the front building line set by Nos.21 and 29 Fircroft Crescent. Plot 3 would accord with the rear building line to No.21. Plot 1 would project beyond the rear building line of No.29.

The layout of the site is depicted on the block plan reproduced below.



Figure 7 – Proposed layout plan

Relevant Planning Policy

The statutory Development Plan for the area comprises the Arun Local Plan 2011 - 2031.

Policies within the Arun Local Plan 2011 - 2031 considered relevant to this application are set out in full below and overleaf.

Policy SD SP1 – Sustainable Development

Policy SD SP1

Sustainable development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken.

Policy SD SP2 – Built-up Area Boundary

Policy SD SP2

Built-up Area Boundary

Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.

Policy D SP1 – Design

Policy D SP1

Design

All development proposals should seek 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. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.

With major developments (as defined in the GDPO 1995 (as amended⁽⁴¹⁾) or allocated sites in the Development Plan. In addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required.

Policy D DM1 – Aspects of form and design quality

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 to reflect the local area.

3. Impact

Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

4. Innovation

Raise standards of design by embracing appropriate 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 '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.

Policy D DM2 – Internal space standards

Policy D DM2

Internal space standards

The planning authority will require internal spaces to be an appropriate size (having regard to the exceptions that may apply as referred to in paragraph 13.3.4) to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards will provide guidance.

Policy ENV DM5 – Development & Biodiversity

Policy ENV DM5

Development and biodiversity

Development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not). Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.

Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person.

All developments shall have regard to Natural England's standing advice for protected species.

Policy ECC SP2 – Energy and climate change mitigation

Policy ECC SP2

Energy and climate change mitigation

All new residential and commercial development (including conversions, extensions and changes of use) will be expected to be energy efficient and to demonstrate how they will:

- a. Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
- b. Use design and layout to promote energy efficiency; and
- c. Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.

All major developments⁽⁴⁷⁾ must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable. Energy efficiency measures will be taken into consideration when the total predicted energy requirements are calculated. The Council will consider 'allowable solutions' where it is clearly demonstrated that the provision of on site renewable or low carbon energy generation is unviable or not feasible.

Where planning permission is required to retrofit energy efficiency measures into existing development, schemes will be permitted, subject to the Design and Built Heritage policies.

In assessing the achievement of these standards the Council will consider:

- Site constraints;
- Technical viability;
- Financial viability; and
- Delivery of additional benefits.

The Rustington Neighbourhood Plan 2014 – 2029. Paragraph 3.3 sets out broad objectives for development in the Parish. This is reproduced overleaf.

1. Retain the character of the Village - to retain the character of the village and enhance the locality through encouraging the use of sympathetic construction materials (to include extensions to existing properties). The Village has a varied architectural street scene, and good design should reflect existing architecture and integrate with and complement the surroundings, whilst seeking to retain existing building lines from public or private highways or footpaths.
2. Meet Local Housing Need – to encourage the provision of smaller housing units, 1-2 bed and 2-3 bed houses, required to meet the local need for affordable family homes.
3. Provide Supported Housing where identified need exists – to supplement existing Supported Housing in the Village requiring future development applications which include this type of property to produce evidence of local need.
4. Preserve and Enhance the Conservation Areas – to acknowledge their importance to the community and their relationship to the Village Centre, ensuring development in or around the Conservation Areas reflects their character and appearance. (Plan B page 15)
5. Preserve the Seafront/Greensward – to prevent encroaching development into the vista and greensward on the Rustington Seafront in order to sustain and enhance its character and to ensure no reduction in the amenity value.
6. To promote an attractive shopping facility to enable local business to compete with larger retailers in the surrounding area, the retention of good parking facilities in the vicinity, improvements in signage to draw in new custom and the retention of local shopping parades outside the main shopping area.
7. Support and preserve existing employment land to improve employment opportunities.
8. Improve the environment by encouraging proposed development to incorporate suitable and sustainable on-site drainage in order to alleviate potential flooding issues affecting the whole village and sustain the health and wellbeing of the community through wide ranging projects which enhance local facilities.

Relevant policies in the RNP are set out below:

Policy 2: Housing Design

Development proposals (including alterations to existing buildings) will be supported, provided that their scale, density, massing, height, landscape design, layout and materials reflect the architectural and historic character and scale of the surrounding buildings and landscape. Proposals must also comply with the parking standards adopted by the planning authority.

Policy 4: Sustainable Drainage

Development proposals likely to affect surface water drainage will be supported, provided they are able to demonstrate that they include one or more of the following sustainable drainage design features as appropriate for the ground conditions:

- i. permeable driveways and parking areas;***
- ii. water harvesting and storage features;***
- iii. green roofs; and***
- iv. soakaways.***

Evaluation

Overview

The application site comprises previously developed land located within the built-up area to Rustington. Whilst presently in commercial storage use, the predominant character of the surrounding area is residential.

Recent planning history has established the principle of residential re-development of the site. Outline consent was previously granted under application ref. R/197/20/OUT for the erection of two detached chalet bungalows with associated car barns.

Further, the site lies within a sustainable location where there are good public transport links and convenient access to jobs and services. All these factors make this a sustainable site for residential re-development.

The proposal is therefore compliant with Policies **SD SP1** and **SD SP2** of the Arun Local Plan 2011 – 2031.

Design & Layout Issues

The applicants purchased the site after the initial outline planning permission for two detached chalet bungalows. Their view was that the site would be better re-developed with access off Fircroft Crescent as opposed to Mill Lane. To secure this, they purchased a verge on the Fircroft Crescent frontage to enable access to be taken off this road.

By orientating the proposed bungalows to front onto Fircroft Crescent, a more logical and intuitive layout results. This re-orientation essentially makes the Mill Lane access surplus to requirements, and it is therefore excluded from the application site.

The character of Fircroft Crescent is of post-War suburban, bungalow development. These are a mix of detached and semi-detached bungalows fronting onto the road with individual drives and attached or integral garaging.

This proposal seeks to replicate this character. Each of three bungalows proposed would front onto the Crescent and have individual crossovers with private drive leading to a single integral garage.

The scale and form of the bungalows mirror other properties in the Crescent. There are other examples of bungalows with hipped roofs, modest gable projections and integral garages. In fact, the property at No.21 Fircroft Crescent has similar characteristics to the house types here proposed.

As designed, the bungalows are of a good standard which would reinforce the established residential character of the Crescent. Whilst they are of the same design, visual interest is enhanced through the use of a varied materials palette on the front elevations.

At present, the application site contributes little positive to the street scene of Fircroft Crescent. There is an unsightly blockwork front boundary wall behind which there are glimpses of the dilapidated storage buildings within the yard. It presents a gap in the street frontage which harms the character and appearance of the area as viewed within the context of Fircroft Crescent.

This scheme would open up the front of the site and present landscaped, open plan front gardens which would make a positive contribution to the street scene.

In spatial terms, whilst the bungalows would be closely spaced, they would not appear either cramped or discordant. Each bungalow would have pedestrian access down one side of the property. Spacings would be accentuated by the modest scale and proportions of the bungalows and their fully hipped roofs. The CGI render reproduced in **Figure 6** confirms that the development would have appropriate spacings and gaps with the fully hipped roofs being instrumental in emphasising the spacings between the properties.

There continues to be a need for small two bed dwellings in Rustington, as noted in the **RNP 2014-2029**. Further few bungalows are being built with Developers generally preferring to maximise floor area and therefore resale value. Here three modest 2 bed bungalows are proposed too which supply has not been added to in recent years yet demand remains high particularly from retirees. This scheme is consequently important in that it delivers a type of housing in high demand but rarely built.

The remit of **Policies D SP1** and **D DM1** of the ALP 2011 – 2031 and **Policy 2** of the Rustington Neighbourhood Plan 2014 – 2029 are considered met by this proposal.

Amenity Issues

This proposal is respectful of the front and rear building lines of immediately neighbouring properties in Fircroft Crescent (Nos. 21 and 29). The bungalows have a limited massing and bulk, and their main roof is hipped away from the two side boundaries of the site. Consequently, they would not overshadow these adjoining properties and nor would they appear overbearing when viewed from the rear gardens of the neighbouring properties.

All the properties that immediately adjoin the site will benefit from the removal of existing poor quality storage buildings. To a significant degree, these buildings are built up hard on the property boundaries and their removal will improve residential amenity of adjoining houses.

The proposed bungalows meet minimum space standards for a two-bed bungalow as set out in the Government document, 'Technical Housing Standards – Nationally Described Space Standard 2015'. In these Standards, a two-bed bungalow should have to have a minimum gross internal floor area of 70m². Here, the gross internal floor area of each bungalow is 100m² excluding the integral garage.

The proposal has, at least, one double bedroom. This meets the minimum floor space of 11.5m², whilst the single bedroom exceeds the minimum floor area of 7.5m².

As such, Policy **D DM2** of the ALP 2011 – 2031 is met by this proposal.

Each of the plots provides adequate rear garden amenity space with these being an average depth of 10 metres.

No undue overlooking of neighbouring properties would occur and there would be very comfortable spacings to the rear of properties in Mill Lane. The bungalows are built close to the side boundaries of the site, but this is a common feature of bungalows within Fircroft Crescent.

Highway & Parking Issues

Each of the three plots would be provided with two off-street parking spaces. One space would be within the integral garage with the other being on the drive. Parking standards are set out in a Supplementary Planning document from 2020. This divides the Arun District Area into various Zones. Rustington falls within Zone 4. That is to say, an urban area within a town but not in a central location.

Within Zone 4, residential development is expected to have a minimum of one space per unit and therefore this is exceeded by this development.

Three additional domestic crossovers would not pose additional highway risk or danger. Fircroft Crescent is a lightly trafficked loop road which does not carry through traffic. It experiences very limited on-street parking. It would therefore be safe and convenient to reverse out onto the public highway or, conversely, reverse into the driveway.

The open plan nature of the front garden would ensure adequate pedestrian visibility.

There are considered therefore no highway objections to the application proposal. In fact, access arrangements are preferable to those approved under the earlier planning consent for two units as this scheme involved the contentious use of the Mill Lane access.

Secure cycle storage is proposed through the provision of a small shed in the rear garden of each property. Alternatively, secure cycle parking would be available within the integral garage to each property.

Biodiversity Issues

Mandatory Biodiversity Net Gain requirements were introduced under the Environment Act 2021. The Biodiversity Gain Requirements (Exemptions) Regulations 2024 set down de minimus exemptions for BNG. The first condition is that the development does not impact an on-site priority habitat. The second is that the development impacts less than 25m² of on-site habitat that has Biodiversity Value greater than zero and less than 5 metres in length of site linear habitat.

Given that the application site comprises either concrete surface or building footprint, less than 25m² of habitat would be lost. The small area of grass verge lost to driveway, would more than be compensated through the grassed/lawned area created within the rear gardens through the removal of existing buildings and concrete surfacing. Consequently, even if BNG requirements were triggered by this proposal, the 10% increase would be comfortably met through the provision of a large net increase in grassed or planted surfaces.

The BNG matrix submitted with the application demonstrates that the site has a very low base habitat unit figure of 0.0787. The post-development habitat unit figure would be 0.0968 representing a 22.9% increase. This is essentially achieved largely through the creation of front and rear gardens, tree planting and hedging which would significantly reduce the building footprint and hard surfacing of the existing site which has 100% coverage at present.

It is noted that, irrespective of national BNG requirements, Policy **ENV DM5** of the ALP 2011 – 2031 requires schemes, such as this, to demonstrate ecological enhancements in the interests of biodiversity. The submitted landscape plan indicates hedge, tree and shrub planting within the front and rear gardens to the three properties. Additionally, a bird box would be attached to the fence to each house. These, again, are indicated on the submitted landscape plan. Such ecological improvements are considered sufficient to meet the requirements of Policy **ENV DM5**.

At the time of the earlier outline application, an appraisal was undertaken as to the suitability of the existing buildings on-site to provide bat habitat. This bat roost assessment was undertaken by Lizard Landscape Design & Ecology. Relevant extracts from this Report are reproduced overleaf.

After careful external and internal inspection throughout the entire site, no signs of bats roosting such as grease or urine stains, feeding remains or bat droppings were found.

EVALUATION

There were no visible external access points or roost features present at the time of survey. With no internal signs of bat presence. Therefore, all built structures within the site are deemed to be of '*negligible*' suitability for roosting bat species.

It is considered that there is a '*negligible*' risk of the development proposals committing offences under prevailing UK and EU legislation and therefore no further survey work with regards bats is recommended.

With regard to bats the landscape that immediately surrounds the affected buildings is suggested to be poor both in terms of bat foraging potential and habitat cover. Both of these factors are also believed to reduce the likelihood of bats roosting within the proposed buildings.

CONCLUSION

The site area consists of existing single story and single skinned built structures of varying designs and an area of hard-standing only, overall the site is assessed as being of '*low*' ecological value.

All built structures were deemed to have '*negligible*' suitability for roosting bats and will therefore no further surveys for bats are required.

Potential habitat enhancements which would increase the overall biodiversity levels of the site are shown in section 7.0 below. Given the low existing biodiversity within the site, any ecological enhancements provided would result in the proposed scheme having a *positive increase* on biodiversity in the long-term.

The Lizard Landscape Design & Ecology Report confirms that the existing buildings are not suitable for bat habitat and showed no evidence of bat usage. The relatively urban nature of the surrounding area was also considered to mean that this site had limited attraction to bat species.

Contamination Issues

Given the commercial use of the site, a full Contamination Survey has been undertaken. This has involved soil samples. The Report was prepared by W K Elson and this accompanies this application. Reproduced below are his conclusions.

4. Risk Assessment

The soils below the site have been protected to a large extent by the concrete hardstanding. Recent use of the site has been for office/storage activities and a carpentry workshop. These activities were unlikely to give rise to major pollution. No significant contamination was found in the soil samples assayed and the risk of pollution to the Brickearth below the site has been assessed to be low.

A conceptual model for the site has been prepared (Table 2) using the source-pathway-receptor model given in Contaminated Land Risk Management.

5. Conclusions

The site off Fircroft Crescent, formerly known as Croft Works with access from Mill Lane has been used by a number of small businesses for many years. Currently the site is derelict and the small buildings are in a state of dis-repair. The whole of the site as been surfaced with a concrete hardstanding effectively sealing the underlying soil. The proposed development comprises three bungalows with small rear gardens. Samples of soil from below the existing paving showed no evidence of contamination and the concentration of all the determinands was below published screening values for residential occupation with plant uptake. No significant risk to human health or to the general environment was identified.

No remediation of the site will be necessary, however the existing hardstanding, concrete and hardcore sub-base in the areas of the gardens should be removed and replaced with a minimum of 200mm of certified clean topsoil.

Surface & Foul Water Drainage

Foul water drainage is to be dealt with through direct connection with the foul sewer in Fircroft Crescent.

A surface water drainage solution has been fully investigated following appropriate winter ground water monitoring. A Report has been prepared by Meridian Civil Engineering, and this accompanies the application. Ground water conditions have been proven suitable for a soakaway drainage system. There is a drainage plan accompanying the application showing the position of the soakaways and the associated drainage runs. A SuDS compliant scheme is achievable in this instance.

Arboricultural Issues

There are no trees on the application site. Off-site there is a hornbeam tree whose Root Protection Area extends over the southwest corner of the site. None of the three bungalows encroach into this Root Protection Area and, in fact, the development will remove a building and concrete surfacing currently within the RPA of this tree and should, therefore, benefit its health.

It would be the intention of the applicant to erect protective fencing around the Root Protection Area of the hornbeam tree during the course of construction.

The existing building to be demolished in the southwest corner of the site will be undertaken using manual dig only. Excavation of existing foundations will be carried out using handheld tools only in order to monitor the presence of roots within the demolition zone.

Miscellaneous Issues

Secure cycle storage would be available within the integral garaging of the proposed bungalows. The applicant would be prepared to construct a small shed in each garden, if this were deemed not appropriate.

Electric vehicle charging points would be installed for each of the three units and these are shown on the submitted block plan.

A detailed landscaping scheme is submitted with the proposal, and this comprises a mix of hedge, tree and shrub planting to both the front and rear gardens and the provision of lawned gardens to the rear replacing the existing concrete surfacing.

Conclusions

This is a carefully considered, small, residential re-development scheme of brownfield land within the built-up area boundary of Rustington. It has previously had outline planning permission for residential re-development. In principle, therefore, the use here proposed is acceptable in planning terms.

The scheme has been carefully designed to accord with the established bungalow development within Fircroft Crescent. This scheme would sit comfortably within the street scene to Fircroft Crescent and reinforce the prevailing character of the area.

In design terms, this is a scheme of an appropriately high standard where the use of a varied palette of materials on the front elevations of the three units would create visual diversity and interest.

Each of the three units would have adequate private rear amenity space and adequate off-street parking.

No harmful impact on the amenities of any neighbouring property would arise.

BNG requirements can be met on-site. No protected species would be impacted and no landscape features harmed.

There remains a strong demand for small bungalows within the coastal area, and it is a form of development that is rarely provided for in new build schemes today. This scheme is therefore to be recommended in terms of the form of residential development proposed.

The removal of the untidy, dilapidated range of commercial buildings will lead to townscape improvement. It will also benefit the amenities of neighbouring residential properties.