ADUR & WORTHING
COUNCILS

Adur & Worthing Councils
Worthing Town Hall
Chapel Road
Worthing
West Sussex, BN11 1HA
www.adur-worthing.gov.uk

The Planning Inspectorate
3G
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date: 6 March 2020
Service: Development Management
Tel: 01903 221065

planning@adur-worthing.gov.uk

Our Reference: AWDM/1185/19
Your Reference: APP/Y3805/W/20/3244893
Town and Country Planning Act 1990
Appeal by Randall & Chisnall Ltd
Site Address: Former Manor Filling Station, Old Shoreham Road, Lancing, West Sussex , BN15 0QS

Dear Ms Rooney

I write with reference to the above planning appeal. The Council will not be submitting a full Statement of Case for this appeal as the original Officer's Report is considered to sufficiently explain why the application was refused and therefore should be dismissed at appeal.

However, I would like to take this opportunity to respond to a number of points raised by the appellant's planning agent in his Statement.

While the Council currently cannot demonstrate an up to date housing land supply position in accordance with the NPPF, the current proposal would make only a very modest contribution to housing provision and would not provide any affordable units. The Housing Delivery Test data for 2019 has now been received from DCLG (February 2020). Adur has failed the test and delivered 56% of its housing target, requiring a 20% buffer to be added to our Five Year Housing Land Supply calculation for the period 2019-2024.

However, the Council can now demonstrate a five year housing land supply with a 5.2 year supply of deliverable sites from the current monitoring year (2019). The Local Plan trajectory demonstrates that, when measured against the Local Plan delivery target, this shortfall can be addressed in the five year period 2019-2024 due to the strategic

allocations at New Monks Farm (600 homes), and West Sompting (520 homes) and sites within the Shoreham Harbour Broad Location (Policy 8), together with some SHLAA sites, which are starting to deliver (see policies 2 and 3 forwarded with the Questionnaire). The New Monks Farm development has recently commenced and the West Sompting application is expected to be considered by the Planning Committee later this year and commence shortly afterwards. Development has also commenced at Free Wharf at Shoreham Harbour (540 homes). An update on the Council's housing land supply position is attached to this letter.

The NPPF does not advocate providing houses irrespective of consideration of harm caused. In this case, the harm to the character and appearance of the area caused by this development, and the unsatisfactory living conditions for future occupiers, outweighs the proposed development's small contribution to housing provision. As such, it fails to be sustainable development as required by the NPPF.

The proposed house would be more cramped than the other houses within this development as it would sit at the eastern end of the site where the site boundary curves, resulting in the dwelling having no rear garden (other than a small paved area) and only a side garden of between 3.2m and 7.4m width to the retaining wall. This small garden will be overshadowed from mature trees on higher ground to the east, which are preserved by TPO. In spite of this formal protection, there will be inevitable pressure to fell or regularly cut back the trees to enable more light to reach the garden and rear of the house, which would not be the case if the land was occupied by a garage block as originally approved. Future occupants are also likely to suffer from leaf litter and windthrow. It would not be sustainable to allow the construction of a dwelling which is likely to result in long term adverse amenity conditions for its occupants.

For the reasons set out in the Officer's Report and this letter, the adverse impacts of granting permission would significantly and demonstrably outweigh this development's benefits in terms of making a very small contribution to the supply of housing. The proposal fails to be sustainable development in that it fails to provide a good standard of amenity for future occupants, and will result in a cramped layout which is harmful to the visual amenities of the locality. The Inspector is therefore respectfully requested to dismiss the appeal. However, without prejudice to the Council's case, if the appeal is allowed the Council requests that the conditions submitted separately be imposed.

Peter Barnett

peter.barnett@adur-worthing.gov.uk
01903 221310