Adur District Council

Planning, Regeneration and Wellbeing

The Planning Inspectorate
3/22 Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our Ref: AWDM/1000/11
Your Ref: APP/Y3805/A/12/2173747/NWF

Date: 21 May 2012

Dear Sir

Appeal by City South Contractors

Site at 29 High Street, Shoreham-by-Sea, BN43 5DD

I write with reference to the above appeal.

You will have already received the Council's Appeal Questionnaire and list of suggested conditions should the appeal be allowed.

The Officer's report to Planning Committee has also been submitted with the questionnaire and that sets out the Council's case in detail. It is not therefore proposed to submit a full statement in respect of this appeal. However, I would like to take this opportunity to respond to a few points within the appellants' statement of case and to make reference to the National Planning Policy Framework (NPPF) which has come into force since the refusal of the application.

The NPPF seeks to achieve sustainable development, described in the Ministerial foreword as "change for the better" and "enhancing and improving the places in which we live our lives." It recognises the role that residential development can play in ensuring the vitality of town centres. In order to achieve high quality outcomes, local planning authorities are encouraged to use design codes which should concentrate on criteria such as scale, density and massing (paragraph 59).

The Council has an adopted design code in the form of DC Standard No.4 'Flat Conversions'. This has significant weight as it was adopted as part of the Local Plan, in relation to policy AH9 (as can be seen in the supporting text to that policy, previously forwarded). While this refers to the conversion of dwellinghouses into smaller self-contained units, the principles are the same for the conversion of any building into flats as

the policy and supplementary guidance set out the minimum reasonable standard of accommodation which should be achieved in any conversion scheme, specifically in relation to internal space standards. These standards have been supplemented more recently with a Good Practice Guidance Note, 'Internal Space Standards for New Homes' (adopted January 2010) which sets out the minimum standards for new, purpose-built development and which clearly supports the Council's aim to achieve a better quality of accommodation. This conforms with the NPPF in terms of seeking to "enhance and improve the places in which we live our lives". A copy of the Guidance Note is attached as Appendix 1.

The Local Plan was adopted in 1996 and due weight should be given to relevant polices in this plan according to their degree of consistency with the NPPF. It is the Council's view that policy AH9 of the Local Plan and the supplementary planning guidance in the form of DC Standard No.4 are relevant and are consistent with the aims of the NPPF.

The development which would result from the appeal proposal would not achieve a satisfactory **minimum** floor area, resulting in cramped and substandard accommodation which would be harmful to future residents and which would detract from the quality of the environment. The Council considers that the substandard quality of accommodation fails to meet the needs of the present, let alone future generations, and is not sustainable.

There is also an issue with noise, from road traffic and the adjacent pub, which is referred to by the Council's Environmental Health Officer. To increase the number of flats at the property could potentially lead to further conflict with future occupiers.

With regard to housing supply, the Council's 5 year housing land supply assessment 2011-2016 (Appendix 2) demonstrates that, compared against the South East Plan, a five year supply of deliverable housing sites can be demonstrated with a surplus of 224 dwellings. The Annual Monitoring Report also shows that the District has sufficient capacity within the built up area to deliver the required number of new homes until around 2018, after which any shortfall will need to be addressed through new land allocations in the forthcoming Local Plan (Appendix 3). Housebuilding in the District over the early years of the South East Plan is above the annual average (page 22 of the report). There is therefore no overriding need to allow new, substandard housing development.

For the reasons outlined in the officer's report and this letter, the appeal proposal fails to comply with national or local plan policies and the Inspector is respectfully requested to dismiss the appeal.

Yours faithfully

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