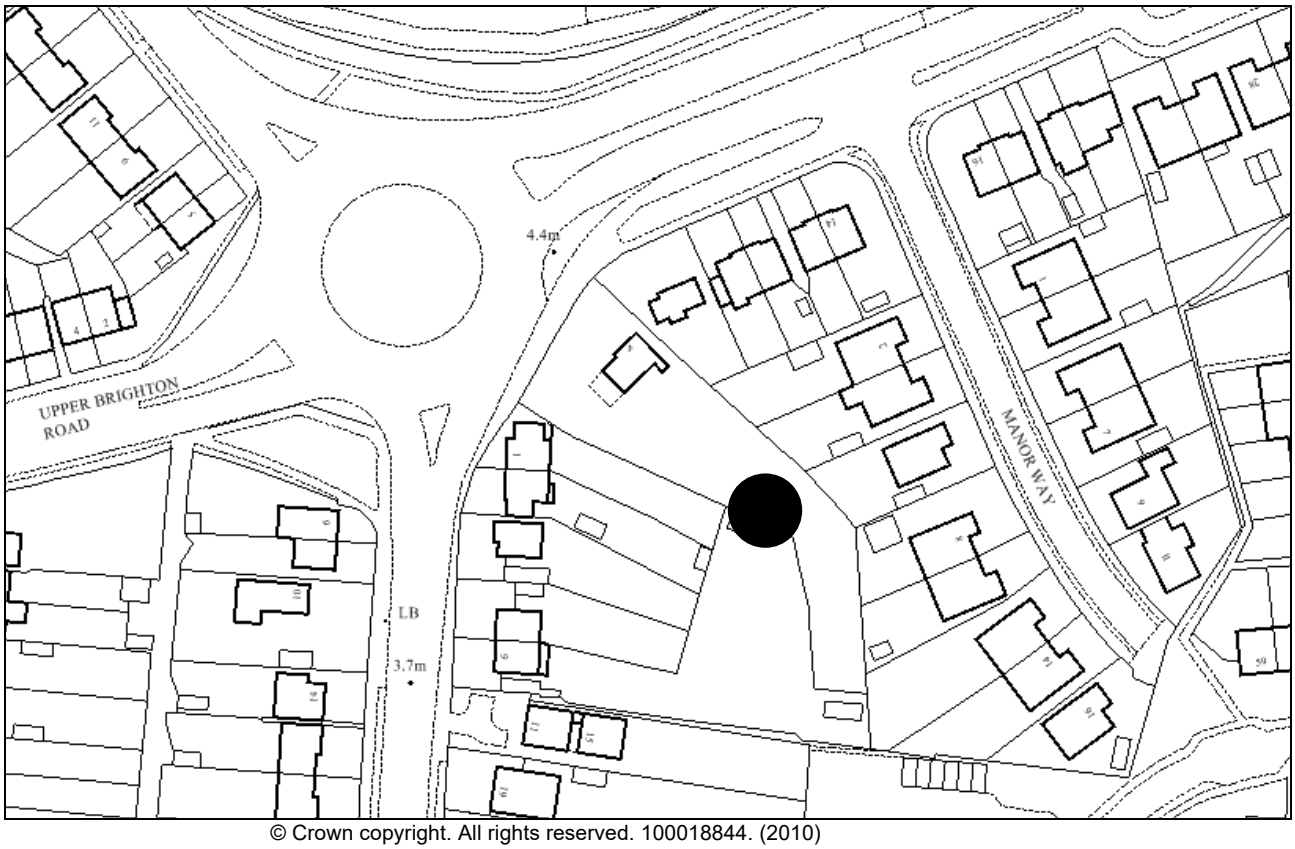
Application Number: ADC/0358/10 Recommendation - REFUSE

Site: 4 & 6 Old Shoreham Road, Lancing BN15 0QT

Proposal: Demolition of existing houses (No's 4 and 6) and erection of 14 new dwelling units comprising 9 flats in 2 three-storey blocks (4 two-bedroom, 4 one-bedroom and 1 studio) at the north end of the site and 5 two-storey houses (4 semi-detached three-bedroom and 1 detached two-bedroom) served by new access road off end of service road and 23 car parking spaces



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The Application

This is a revised scheme following the refusal of the previous outline redevelopment proposals for 10 dwelling units (4 flats and 6 houses) in November 2007 (ADC/0498/07) and the earlier proposal for 12 dwelling units (6 flats and 6 houses) in January 2007 (ADC/0467/06).

The application site has been enlarged to include No.6 as well No.4, both detached houses fronting onto the south east side of the roundabout at the intersection of the A27 trunk road (Old Shoreham Road) with the A2025 (Grinstead Lane). No.4 has vehicular access directly onto the roundabout but No.6 has access onto the separate (cul-de-sac) service road on the south side of the trunk road. The application site (0.27 hectare) includes the curtilage of both these dwellings, No.4 having a very large, 100m long plot which runs along the rear boundaries of the rear gardens of bungalows in Manor Way to the east and houses in Grinstead Lane to the west. It

extends southwards to the boundary with a Council-owned parking and garage compound on the west side of Hayley Road.

It is proposed that the two existing houses No's 4 and 6 are demolished and replaced by 9 flats with 5 houses at the rear served by a new access road. The existing access onto the roundabout is to be closed off with all access gained from the end of the service road currently terminating in front of No.6. The new access road into the site from the end of the service road would continue to the southern boundary of the site where a turning head would be created. A total of 23 parking spaces are proposed to serve the development.

On the front part of the site, the flats would be provided in two buildings, either side of the new access road, both of three-storey contemporary design with front balcony features, white render, brick and leadwork proposed. The buildings have a maximum height of 8.4m. Behind these, 4 semi-detached houses and 1 detached house are proposed, along the west side of the proposed road. These buildings are of similar-style contemporary design to the frontage buildings with the use of the same pallet of materials plus timber cladding. They have curved and asymmetric roofs to a maximum height of 6.6m.

As stated above, there have been 2 previous refusals relating to No.4 Old Shoreham Road, ADC/0467/06 and ADC/0498/07. The latter was refused for the following reasons:-

1. *The proposed development, by reason of its design together with its proximity to a roundabout and the number of traffic movements associated with the proposed dwellings, would compromise the safety and free flow of traffic travelling along the A27 trunk road. As a result, the proposal would be contrary to the policies of the West Sussex Structure Plan (DEV4), the Adur District Local Plan (AH2) and PPG13.*
2. *On the information available with this outline application, the LPA is not satisfied that the proposed development would accord with the requirements of the policies of the West Sussex Structure Plan (DEV1) and the Adur District Local Plan (AH2), particularly in respect of achieving a high quality environment, sufficient rear garden space for the proposed houses and adequate standards of privacy and avoidance of an overbearing effect on existing neighbouring dwellings.*
3. *The proposed access to the site does not appear to meet recognized highway standards and, in the absence of a Stage 1 Safety Audit in accordance with the adopted West Sussex County Council Road Safety Audit Policy, the Local Planning Authority is not satisfied that the proposed development would not result in conditions detrimental to highway safety or that the requirements of policy DEV4 of the West Sussex Structure Plan would be met*
4. *There is no evidence that the necessary contribution would be made to improvements to sustainable transport to offset the effects of the travel and infrastructure demands generated by the proposed dwellings, as required by the West Sussex Transport Contributions Methodology and policies DEV3-5 of the West Sussex Structure Plan.*

The current application is a full planning application and is accompanied by a Design and Access Statement, Planning Supporting Statement, Transport Assessment, Flood Risk assessment, Noise Assessment, Air Quality Assessment and Waste Minimisation Statement. The current scheme seeks to address the above reasons for refusal with the revised design, site area and supporting documents.

Consultations and Representations

Highways Agency: Advise that the application should be refused, the reason being the continuing concerns they have in relation to the increased incidence of traffic that this development will engender in relation to the use of the 'U-turn' facility on the A27T to the east. They add that they are considering a number of potential options to improve traffic flows and safety in this area and therefore would wish to renew a dialogue to explore matters further which may then facilitate development of this site. On the previous application in 2007, they objected on grounds that the proposed development, by reason of its design together with its proximity to a roundabout and the number of traffic movements associated with the proposed dwellings, would compromise the safety and free flow of traffic travelling along the A27, stating that it was therefore contrary to Circular 2/2007 and the provisions of PPG13.

West Sussex County Council: From a transport point of view, state that the effect on the A27T falls within the purview of the Highways Agency. They note that the application now includes a Stage1 Safety Audit and they have no objection to the extension of the service road into the site with a 4.8m wide private shared surface road to a turning head. They state that the lack of footways is acceptable for the level of traffic likely to be generated within the road but that, under the newly-revised parking standard, 4 additional visitor parking spaces should be provided, otherwise it is likely the turning head would become obstructed by parked cars. The existing access onto the roundabout should be closed and not used by construction traffic. A sustainable transport contribution of £15,706 is required to offset the travel demands of the development, plus an infrastructure contribution of £226 for fire and rescue (but no contribution for education or library services).

As regards Archaeology, because Roman pottery was recovered in 1963 from the garden of No.6, a condition should be imposed requiring the applicant or developer to submit a written scheme of archaeological investigation in accordance with the standard condition.

Adur District Council: The Environmental Health Officer states that the proposed blocks of flats too close to the road, being appreciably closer to the highway than the existing houses and would create an additional 8 flats exposed to excessive traffic noise levels, with bedrooms (the most sensitive rooms) facing the roundabout. The applicant's consultant's monitoring location lies within NEC 'C' of PPG24 for both day and night time periods, where new residential development should not be permitted unless no other suitable sites exist. Acoustic attenuation and forced air ventilation can reduce internal noise levels but the basic principle is to reduce noise exposure by separating conflicting uses not shielding the recipient.
As regards air quality, the applicant's consultant's assessment (which is based only on a 'snapshot') indicates that the air quality objective for nitrogen dioxide will be exceeded at the site and due to the proximity of the flats there will be relevant exposure. This means that the Council would have to devote resources to fully assessing the site and possible declaring an additional Air Quality Management Area. It is concluded that the flats are too close to the road and this would result in both noise and air quality implications.

Environment Agency: No objection provided a condition is imposed requiring the proposed development to meet the requirements of the submitted Flood Risk Assessment (FRA) by setting finished floor levels no lower than 0.3m above existing ground level.

Southern Water: No objection, commenting that a formal application for a connection to the public sewer would need to be made by the applicant or the developer and the council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways.

Sussex Police: Advise that the road layout creates good defensible space allowing residents to exercise control and self police their own environment. With the houses facing northwards and not straight onto the street, suggest consideration be given to incorporating gable end windows in their east elevations. It is important that parking courts are illuminated to maintain surveillance from the dwellings and dwelling frontages should be open.

Lancing Parish Council: Object on grounds of gross overdevelopment and out of character with the neighbourhood, also commenting that there are concerns about the adjacent bungalows being overlooked and the very poor access to the development afforded by the narrow service road. The number of units would also add to the traffic movements to and from the A27 which is considered to be dangerous.

Third Parties: 8 letters/emails of objection have been received from local residents at No's 7 & 9 Grinstead Lane; No's 8 (2), 10, 12 & 14 Old Shoreham Road; and No.6 Manor Way raising the following issues: -

- Changes in government policy restricting garden development.
- highway safety,
- lack of parking,
- loss of privacy,
- loss of light,
- noise, disturbance,
- overdevelopment,
- flooding issues,
- design of buildings out of keeping,
- impact on wildlife,
- previous applications refused,
- restricted access for emergency services.

Relevant Planning Policies and Guidance

The South East Plan 2006-2026 (GOSE 2009): SCT1, SCT5, SP3, CC6, H1-2, H5, BE1-2
Adur District Local Plan (1996): AG1, AH2, AH5, AB23, AB25-27 and Appendix 11
Supplementary Planning Guidance comprising Development Control Standard No.2 "Space Around New Dwellings and Flats"
'Good Practice Guidance Note: Internal Space Standards for New Homes' (ADC 2010)
Design Bulletin "Trees and Landscaping" (ADC 1996)
Revised West Sussex Parking Standards and Transport Contributions Methodology (WSCC 2003, amended 2010)
The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1 (WSCC 1999)
PPS1 'Delivering Sustainable Development' (ODPM 2005)
PPS3 'Housing' (DCLG 2006, amended 2010)
PPG13 'Transport' (DTLR 2001)
PPG24 'Planning and Noise' (DoE 1994)

PPS25 ‘Planning and Flood Risk’ (ODPM 2006) and Practice Guidance and Circular 04/07

Planning Assessment

Policies

The site is located within a residential part of the built-up area and the proposal constitutes redevelopment and infilling as provided for in Local Plan policies. There is no objection in principle to infill development within the built-up area and, in order to meet the housing requirements of the approved South East Plan and Local Plan, a significant proportion of housing development by way of development of ‘unidentified’ infill sites is necessary. However, the suitability of individual sites for development depends upon many factors including the adequacy of the means of access to the land, the character of the locality and the siting and configuration of existing and proposed dwellings.

The South East Plan (the rescindment of which has been overturned by a recent High Court judgement) sets out the long term spatial planning framework for the region with the aim of achieving more sustainable development, protecting the environment and combating climate change. Policy SCT1 gives priority to pro-actively pursuing sustainable economic growth and regeneration of the Sussex Coast whilst also protecting and enhancing its high environmental quality, its cultural and historic assets and promoting excellence in design of new developments in recognition of their importance to economic success and quality of life.

Policy SP3 seeks to achieve at least 60% of all new developments on previously developed land and through conversions of existing buildings. Developments in urban areas, including infill, should be well designed and consistent with the principles of urban renaissance and sustainable development. Policy CC6 requires development to respect, and where appropriate enhance, the character and distinctiveness of settlements and landscapes throughout the region, and to use innovative design processes to create a high quality built environment which promotes a sense of place.

SCT5 & H1 set housing targets for the Sussex coast sub-regional area and Adur for 2006-2026. These targets are to be met by focusing development in existing towns, by optimising the use of previously developed land. H5 aims to raise the quality, adaptability and sustainability of new housing and at higher densities (overall regional target 40 dwellings per hectare). T4 states that Local Development Documents should apply guidance on parking standards for housing in line with PPS3, reflecting local circumstances, and ensure sufficient and secure cycle parking for new flats and houses. BE1, entitled management for an urban renaissance, states that opportunities will be taken to improve the built environment, including by promoting design solutions relevant to their context and building upon local character and by supporting opportunities for appropriate higher density and mixed use development schemes. BE2 states that Local Development Frameworks should identify areas where suburban intensification could assist wider planning objectives subject to providing clear planning and design guidance based on local character appraisal.

Local Plan policy AH2 relates to new residential development (by way of infilling and redevelopment) and states that new dwellings should be designed so that their appearance, character and scale create a pleasant place in which to live and are in keeping with and enhance the existing local environment with particular attention being paid to architectural form, height, materials, density, layout of buildings and

hardsurfaced areas; they do not have an unneighbourly effect due to loss of privacy; daylight/sunlight; outlook or open space, incorporating adequate standards of residential amenity for the new dwellings in terms of amenity space, daylight, outlook and privacy; access and parking provision meets the adopted standards; and they accord with the Council's DC Standard No.2 'Space around New Dwellings and Flats'.

Government policy guidance in PPS1 states *"Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted."*

PPS3 encourages best use of urban land for housing development, without rigid application of parking and amenity space standards. However, it also seeks to improve the quality and attractiveness of residential areas and urges imaginative designs and layouts which make more efficient and sustainable use of land without compromising the quality of the environment. PPS3 also states that Councils should "*facilitate good design by identifying the distinctive features that define the character of a particular local area…….. ...Careful attention to design is particularly important where the chosen local strategy involves intensification of the existing urban fabric……successful intensification need not mean high rise development or low quality accommodation with inappropriate space……..The density of existing development should not dictate that of new housing by stifling change or requiring a replication of existing style of form……If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment."*

PPS3 was amended in June 2010 to remove garden land from the definition of previously developed land and the indicative minimum density for development of 30 dwellings per hectare was also deleted.

Density, Character and Visual Amenity

The character of this area is relatively low density; southwards from the site comprising detached and semi-detached dwellings with large rear gardens with trees and shrubs. The net density of this existing development (excluding roads) is only about 23 dwellings per hectare (dph). The houses and bungalows in Manor Way and Old Shoreham Road to the east are at a higher net density of about 31dph and those to the rear in Hayley Road higher still.

However, No.4 Old Shoreham Road, the application property, has a particularly large curtilage and is at a far lower net density than the other properties, being the equivalent of only 4dph. The greater part of the application site appears to be disused and has previously been the subject of enforcement action against unauthorised uses. It is clearly so large as to vastly exceed the need for garden space. It is not considered, in principle, that the Government's redefinition of 'brownfield land' to exclude residential gardens should prevent this site from being developed. No.6 Old Shoreham Road has a much smaller plot and equates to 25dph.

However, the particular development proposed, with 14 dwelling units, would result in a gross density of 51dph (including the access road). The flats alone are at a net density of 90dph and the houses behind at 45dph. This is considered to be overdevelopment of the site and to be excessively out of keeping with the character of the surrounding area. The length and narrowness of the developable site, accentuated by the need to accommodate the access road and parking provision, contributes further to the cramped appearance with the dwellings to the rear of the

site being close to the western boundary. There is concern that the proposal does not achieve a high quality environment.

The applicant's Design and Access Statement contends that "The proposal is designed to enhance the street scene by providing a traditional and contemporary mix of design and materiality." However, with their three-storey contemporary elevational design, the scale and impact of the two blocks at the front of the site would be very considerable. They would stand out from the two-storey pitch-roofed houses and would have a contrasting form and character. It is difficult to avoid subjectivity but, on balance, it is not considered that the contrasting contemporary design style of these buildings, of itself, would warrant refusal. Arguably, a contemporary design would add a feature on the roundabout, creating visual interest. However, it is considered that they stand too far forward and are too large, having insufficient space in front and at the sides. More space is necessary to enable them to fit in better with their surroundings, particularly space for planting of small trees.

The houses at the rear (which taken alone are at a net density of about 45dph) are considered acceptable in their contemporary design and flat-roofed profile which limits their height, but again they are felt to be too close to the site boundary in some cases, resulting in a cramped effect.

Residential Amenity – effect on neighbouring dwellings

With regard to the impact on the considerable number of surrounding existing dwellings in Old Shoreham Road, Grinstead Lane and Manor Way, it is acknowledged that the houses to the west have very long rear gardens (approximately 22m-30m deep). Those in Manor Way to the east are much shorter (about 11m-20m).

Owing to the 'backland' nature of the site and the great increase in the intensity of its use, there will clearly be additional noise and disturbance to neighbouring rear gardens due to increased traffic and activity. It is considered that the principle of residential development at this site is acceptable but that the density needs to be reduced so as not to result in an adverse effect on neighbouring residents.

The access road is adjacent to the rear boundaries of the bungalows in Manor Way, with turning space also to the south of the site. However it is considered that with appropriate boundary treatment this relationship is acceptable. The buildings themselves will not be overbearing or result in any loss of light or privacy in this case. The distance between the proposed dwellings and the houses and bungalows to the west and east is a minimum of 22 metres (and up to about 30m in some cases) therefore meeting or exceeding the Council's Development Control Standard of 22m.

Residential Amenity – for proposed dwellings

As stated above, the proposed scheme is considered to be overdevelopment of the site. The layout appears cramped and its environmental quality is considered to fall short of an acceptable standard. Having said this, the minimum garden areas for all dwellings are met and the internal space standards are also complied with. However, none of the 5 dwellings meet the 11 metre minimum depth garden requirement. The rear of the dwellings are too close to the western boundary in some instances, especially house 5 which appears 'wedged' in and angled to fit into the site as it narrows.

Also with regard to the standard of the accommodation provided, the apartment blocks front onto the roundabout with the main living accommodation to the rear with southerly aspect and access to amenity space. However the location of these blocks so close to the highway is considered to be detrimental to the residential amenities of the future occupiers of these dwellings, especially with bedrooms facing in this direction. This is discussed in more detail below under Traffic Noise.

Traffic Noise and Air Quality

The two blocks on the site frontage located next to the roundabout, accommodating the 9 flats lie within NEC 'C' of PPG24 for both day and night time periods. PPG24 states that new residential developments should not be permitted, unless no other suitable sites exist. This development would result in the exposure of 9 units to excessive traffic noise levels with the most sensitive rooms (sleeping accommodation) facing onto the roundabout. It is accepted that acoustic attenuation and forced air ventilation can reduce internal noise levels, but the basic principle is to reduce noise exposure by separation of conflicting uses, not shielding the recipient.

The Air Quality Assessment indicates that the Air Quality Objective for Nitrogen Dioxide will be exceeded at the site and due to the proximity of the two frontage blocks to the roundabout and A27 there will be relevant exposure.

The Council's Environmental Health Officer has advised that the application should not be supported due to the above concerns with regards to noise and air quality.

Effect on trees

The application form indicates that the existing trees of widely varying types and sizes around the boundaries of the site would be retained. The proximity of the proposed buildings and road construction to some of the trees gives rise to concern that these trees might be lost either through direct impact of the works or through future desire of residents to fell them because of problems of overshadowing or potential damage to buildings, etc and more details are required.

Highways Access and Parking

The existing access to No.4 Old Shoreham Road directly onto the roundabout clearly gives rise to serious concerns about highway safety. The proposal results in the closure of this access, and its replacement by a new access via the service road (cul-de-sac section) on the south side of the A27T. However, the Highways Agency, as with the earlier applications in 2007, recommends refusal because of the additional traffic generated by the proposed 14 dwelling units on this congested stretch of the A27, principally being concerned about the generation of U-turn movements in the central reservation of the A27 close to Withy Patch.

Traffic exiting the site would have to join the westbound carriageway of the A27 where severe queueing occurs at the approach to the roundabout. Traffic entering the site, if coming from a westerly direction, would have to travel eastwards past the site to the gap in the central reservation undertaking a U-turn manoeuvre and thereby increasing the risk of accidents and also adding to journey length. If this gap is closed, traffic would have to travel much further eastwards to turn.

The inclusion of the redevelopment of No.6 to the east has provided more space to overcome the difficulties associated with the previous tight bend into the site directly

abutting the roundabout. West Sussex County Council as the local highway authority comment this proposed extension of the existing service road into the site and, subject to some layout design issues, have no objection in principle to the proposal. However, they do state that the proposed parking provision needs to be increased to provide an extra 4 visitor parking spaces in line with the new WSCC Parking Demand Calculator. This is needed to avoid risk of obstruction of the turning head by parked cars would increase the total number of car parking spaces from 23 to 27.

Should permission be granted, under the adopted Revised West Sussex Parking Standards and Transport contributions Methodology, a section 106 Obligation would be needed in which the owner undertakes to pay a contribution towards the improvement of 'sustainable' transport facilities in the area, to discourage car usage and mitigate the travel demands associated with the proposal. In this case the required amount is £15,706.

A minor contribution is also sought to Fire and Rescue services of £226, under the adopted 'The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1' (WSCC 1999)

Archaeology

The County Council's archaeologist states that Roman pottery was recovered in 1963 from part of the application site (the garden of No.6). It is possible that these finds relate to a Roman settlement or occupation area which may extend into the adjacent land to the rear. A suitable safeguarding condition is recommended.

Flood Risk

The site lies on the edge of the area identified as at risk of flooding by the Environment Agency. A Flood Risk Assessment has been submitted which accompanies this current application. The Environment Agency has no objection to the proposed development subject to the implementation of the mitigation measures set out in the FRA being implemented with finished floor levels set no lower than 0.3m above existing ground level.

Recommendation

REFUSE on grounds that:-

1. The proposed development, by reason of the increased number of traffic movements associated with the proposed dwellings, would compromise the safety and free flow of traffic travelling along the heavily-trafficked A27 trunk road and not accord with guidance in PPG13.
2. The proposed development would not provide satisfactory living conditions for the occupants by reason of the proposed two blocks of flats being sited too close to the highway where they would be exposed to unacceptable levels of traffic noise and pollution, contrary to PPS23 and PPG24.
3. The proposal constitutes undesirable intensification of residential development at a density which would be out of keeping and incompatible with existing development in the locality and which would be detrimental to the residential environment, contrary to policies AG1 and AH2 of the Adur District Local Plan.
4. The proposal has insufficient space for parking and would result in risk of the turning head being obstructed by parked cars with resultant adverse effect on road safety.

5. There is no evidence that the necessary contribution would be made to improvements to sustainable transport to offset the effects of the travel and infrastructure demands generated by the proposed dwellings, as required by the Revised West Sussex Parking Standards and Transport Contributions Methodology.

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