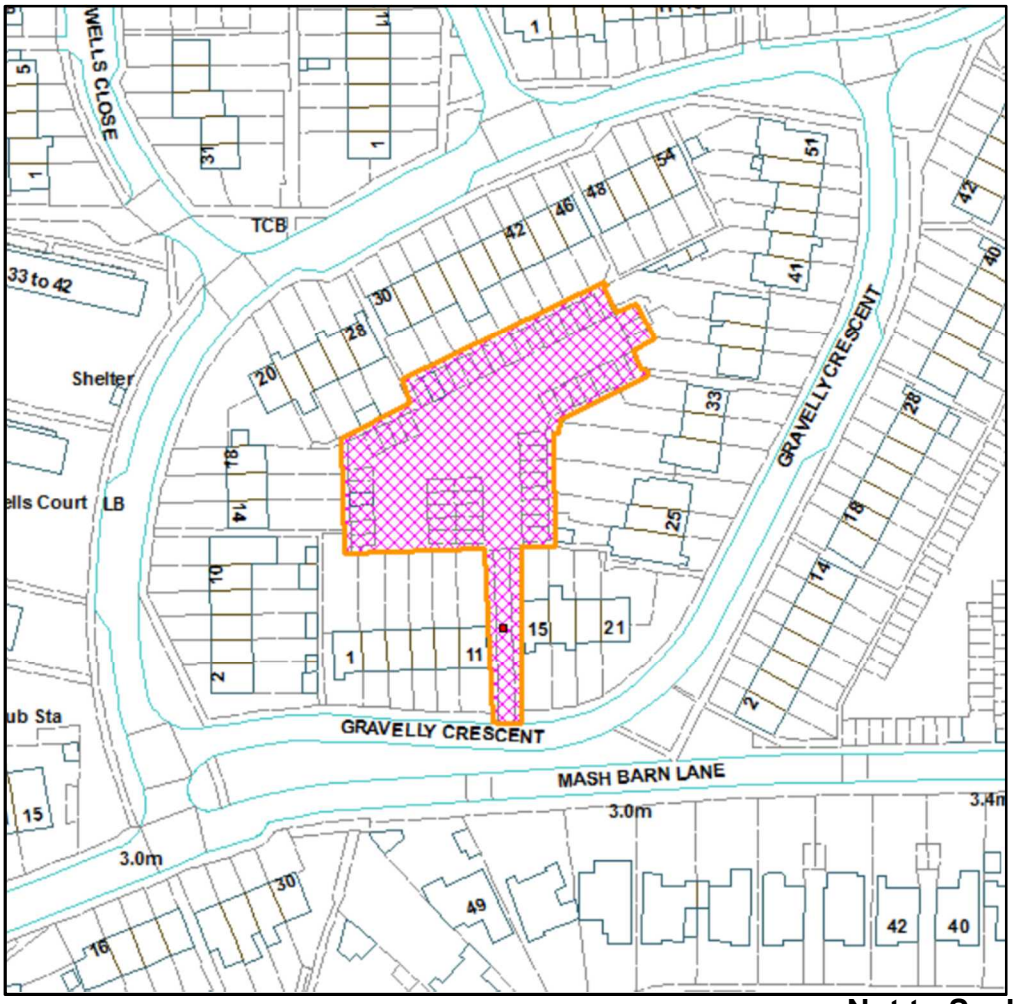
Application Number:	**AWDM/2068/21**	**Recommendation - APPROVE**
Site:	**Garage Compound, Gravelly Crescent, Lancing**	
Proposal:	**Demolition of existing garages, proposed 7no. dwellings within two blocks with 16 parking spaces, access off Gravelly Crescent**	
Applicant:	Mr J Lock, Adur District Council	Ward: Mash Barn
Agent:	Neal Thompson, Robinson Escott Planning	
Case Officer:	Gary Peck	



Not to Scale

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This application is presented to the Committee for determination as Adur District Council is the applicant.

Proposal, Site and Surroundings

The application seeks full planning permission to demolish the existing garages on site and their replacement with 7 dwellings, 4 of which will be 3 bed of 97 sq m in size, 2 will be 2 bed of 81 sq m in size and the other will be a 1 bed disabled access bungalow of 60 square metres.

The proposed development will comprise two blocks of terraces. The 4 x 3 bed dwelling will be situated on the western side of the site in a terraced block, while to the eastern part of the site on a broad north to south orientation will be 3no. dwellings, with unit 7 being a single storey dwelling. Both of the blocks will be arranged in a north-south orientation. 16 parking spaces will be provided. Air Source Heat Pumps will be provided to service the development.

The application site currently consists of 8 existing garage blocks in a backland location off Gravelly Crescent and Shadwells Road within the built-up area of Lancing as defined by the Adur Local Plan.

The site is an irregularly shaped plot with the blocks of single storey garages on all four boundaries of the plot, beyond which on all sides are groups of terraced 2 storey housing, with the longest block being to the north and smaller blocks to the south.

Vehicular access to the application site is gained between 11 and 15 Gravelly Crescent, and there are also various pedestrian accesses between the terraced blocks of houses.

The application was submitted in November 2021 but has been the subject of detailed discussions regarding drainage issues during its determination.

Relevant Planning History

None relevant to the determination of the application.

Consultations

Technical Services

Original comments

Thank you for the opportunity to comment upon this application. We have the following comments on flood risk and surface water drainage.

Flood risk- The application is within flood zone 3, and does have some areas shown to be at risk from surface water flooding. The exception and sequential test should be applied. We do not believe that this site has been allocated within the local plan.

Surface water drainage - the flood risk assessment indicated that the existing site drains via soakaways. No existing connection to the private surface water sewer has been demonstrated. The strategy proposed to drain the access road via infiltration, and to drain the remainder of the development via attenuated discharge to a private surface water sewer. Infiltration should be fully investigated. No evidence has been supplied to demonstrate that permission to discharge to the surface water sewer has

been obtained. Surface water must not discharge to the foul sewer. It has not been evidenced that a policy compliant surface water drainage solution can be delivered here with the site layout as proposed. We therefore wish to raise a HOLDING OBJECTION to this application.

Please can the following information be supplied prior to determination:
1. Evidence of permission to discharge to the private surface water sewer from its owner.
2. Evidence that the distance from the lined permeable paving sub-base to the foul sewer meets the requirements of southern water.
3. A suitable sequential and exception test.

If this information is not provided prior to determination it is likely that the layout will unduly bias the design of surface water drainage and could result in flooding being increased elsewhere.

Should you decide to approve this application despite the holding objection please ensure the following conditions are applied:

"Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter infiltration testing to BRE DG365, or similar approved, will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity."

"Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual."

and the accompanying informative:

"Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE DG365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway

structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Further details regarding our requirements are available on the following webpage:

https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms.

A surface water drainage checklist is available on this webpage. This clearly sets out our requirements for avoiding pre-commencement conditions, or to discharge conditions"

Following first receipt of additional information

Thank you for re-consulting us. We maintain our holding objection at this time as it has not been evidenced that a connection to the surface water sewer can be achieved, i.e. permission obtained. We would strongly object to any proposals to discharge surface water to the foul sewer.

In our view determination should be delayed until it is evidence that either there is space for infiltration and that it will work, or that permission to connect to the surface water sewer has been obtained.

Following second receipt of additional information and a meeting with officers

The Technical Services Officer confirmed that following the receipt of additional information from the applicant's drainage consultant, the previous concerns have now been resolved.

Environmental Health

There are no adverse comments for this application.

Given the location of the development, I would recommend the standard Construction Management Plan condition be attached to any permission.

Lancing Parish Council

No comment

West Sussex County Council

Background and Site Context

The development site is an existing garage court comprising 52 garages and areas of hardstanding used for informal parking of vehicles. Many of these garages are used for general storage rather than for car parking, and as such they are considered too small to be used for parking of modern vehicles. The development proposals are for construction of 7 residential dwellings comprising 2 x two-bedroom units, 4 x three-bedroom units and 1 x one-bedroom bungalow with associated parking and

landscaping.

Pre-application consultation was held with WSCC where no issues were raised with loss of garages in the manner proposed provided that the various assessment activities proposed within the Scoping Note were carried out. Also, the parking stress should not increase noticeably on the roads surrounding the site.

Access and Visibility Access into the Gravelly Crescent garages informal parking area is taken from the north of Gravelly Crescent via a dropped kerb crossover between 11 and 15 Gravelly Crescent. The existing access road is approx. 3m in width with footways along both sides. Gravelly Crescent is a local distributor road subject to 30mph speed limit. In accordance with Manual for Streets guidance, for a posted speed of 30mph speed limit, visibility splays of 2.4m x 43m should be achievable. However, due to the bend in the road visibility splay of only 2.4m x 20m is achievable towards the eastern direction. WSCC's online record for road collisions has been interrogated for the last 5 years which reveals there has been no single incident of personal injury accident near to the site access. This indicates that the site access has been operating in a safe manner.

Parking

WSCC's Guidance on Parking at New Developments (September 2020) has been used to calculate the car and cycle parking requirement for the proposed development. The development aims to provide a total of 16 parking spaces including visitor spaces, which are more than WSCC's parking requirements. It is anticipated that the additional spaces will be able to assist in the accommodation of vehicles that could be displaced because of removal of garages.

In line with WSCC's standards for cycle parking, each dwelling will be provided with two cycle parking spaces within a rear garden shed. Access to these sheds are provided from the rear of the dwellings so as to not carry the bikes through the property.

An independent parking survey was commissioned to understand the parking stress on the local highway network when the existing 52 garages are replaced with the proposed residential development. WSCC's Parking Capacity Survey methodology was used in carrying out the survey. The analysis shows a parking stress of 83% on first day of the survey and 86% on second day of the survey. This indicates there is sufficient spare parking capacity within the local highway network.

Internal Arrangements / Refuse Collection

In accordance with Adur's Space Standards SPD, each dwelling would be provided with a bin storage area to accommodate 2 x 240 litre wheelie bins. In line with the existing arrangements for the neighbouring properties, on the collection day, the bins will be collected from the kerbside or the refuse vehicle will be reversed onto the refuse collection point.

Swept path analysis carried out using a West Sussex refuse vehicle demonstrates the vehicle can reverse onto the access road, near to the refuse collection point and exit in a safe manner. It is also noted that a light van can enter the development and turn

within site using the turning head and exit in forward gear.

Trip Generation and Highway Capacity

TRICS database has been interrogated to calculate the estimated number of trips generated by the proposed residential development. For robust assessment the number of trips generated by the existing uses is not considered. Table 7 within the Transport Note shows the development is likely to generate total two-way movements of 9 in the AM peak hour, 8 in the PM peak hour and 71 during the total daily. The LHA consider that this level of trip generation does not cause a detrimental effect on the operation of the local highway network.

Sustainability

The development site is located within a residential area where there are footways and good street lighting system conducive to walking and cycling. Many facilities and local services are within walking distances. Bus stops are located within 200m distance from the site, along Shadwells Close. These stops provide services to Lancing train station, Shoreham-by-Sea, Worthing, Brighton City airport etc. Lancing train station is located within 1km from the site which provides connections to Portsmouth, London Victoria, Southampton etc. The site is in a sustainable location.

Conclusion

The Local Highway Authority (LHA) does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (NPPF), paragraphs 110 -113, as revised 20th July 2021. Therefore, there are no transport grounds to resist this proposal.

West Sussex Fire and Rescue Service

Having viewed the plans for planning application AWDM/2068/21, with the access route to the dwellings measuring approximately 60 metres, evidence is required showing sufficient turning facilities for a fire appliance to turn and make their exit. This is a requirement of Approved Document – B (AD-B) Volume 1 2019 edition: B5 section 13 Table 13.1.

Environment Agency

In the absence of an acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the Planning Practice Guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- Consider how undefended tidal flooding will affect people and property;
- Provide a comparison of undefended levels to finished floor levels through which to consider flood risk to occupants; and
- Assess the impact of climate change using appropriate higher central and upper end allowances, see: 'Flood risk assessments: climate change allowances'

To overcome our objection, the Applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

Following the receipt of additional information

We are satisfied that our previous objection (as per our letter dated 14 December 2021) can be removed provided that the following condition be attached to any planning permission granted, and that the details in relation to the condition be submitted and approved by the Local Planning Authority.

Condition

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) ('Sustainable Drainage & Flood Risk Assessment, Ref: 15945/03/HOP/SUDS, dated August 2021, by HOP Consulting Limited) and the following mitigation measures detailed within the FRA:

· Internal access to the upper storey of the blocks/buildings is to be maintained for the lifespan of the development, and all sleeping accommodation is to be located on the First Floor and above (section 5.5 of the FRA).

These mitigation measures shall be fully implemented prior to occupation. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reasons

To ensure the safety of the development and future occupants.

Following the receipt of this consultation response, it was advised to the Environment Agency that the condition could not be complied with due to one of the plots being a bungalow with sleeping accommodation on the ground floor. Further comments were therefore requested.

Further comments from the Environment Agency

Thank you for consulting us in regard to the request to amend the condition previously recommended by us in our letter dated 6 April 2022. Specifically, the request is to amend the condition to allow for sleeping accommodation to be located on the ground floor of one unit (Unit 7 which is a bungalow) so that accessible accommodation can be provided as part of the proposal.

We appreciate that accessible accommodation is important and much needed in the area. However, we are concerned that a potentially vulnerable resident(s) could be housed in a site mapped within current day Flood Zone 3. On that basis, we are **unable to recommend** that the previously recommended condition should be amended to allow for Unit 7 to have ground floor sleeping accommodation. The Local Planning Authority can make their own decision as to whether to allow the proposal to proceed without further recourse to us if they are satisfied that any resident(s) of Unit 7 could be safe in a flooding event, and that any evacuation plan is adequate and approved by their emergency planners. If the Local Planning Authority is minded to amend the condition we would suggest that it is rewritten as follows:

Condition:

The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) ('Sustainable Drainage & Flood Risk Assessment, Ref: 15945/03/HOP/SUDS, dated October 2022, V2.0, by HOP Consulting Limited) and the following mitigation measures detailed within the FRA:

- Internal access to the upper storey of the blocks/buildings is to be maintained for the lifespan of the development and all sleeping accommodation is to be located on the First Floor and above, except for one unit providing a wheelchair accessible, level access bungalow dwelling (sections 5.4 & 5.5 of the FRA).

These mitigation measures shall be fully implemented prior to occupation. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

*As a result of this consultation response, the Council's **Safety and Resilience Manager** with the responsibility for Emergency Planning was asked to provide comments:*

With regards to the above Planning applications at Daniel Close and Gravelly Crescent in Lancing, I understand that the Environment Agency (EA) has raised concerns about the proposed ground floor sleeping accommodation designed for two of the new homes at Daniel Close and one of the new homes at Gravelly Crescent.

There is a multi-agency flood plan in effect for Adur District which details the emergency response arrangements. This runs parallel with the Emergency assistance centres plan which covers the evacuation of displaced persons.

In the event of flood defences failing and flooding occurring on these sites, the emergency services would consider the need for evacuation and as a local authority we would support the response by providing and managing a place for displaced

persons to be housed temporarily.The nearest location is Lancing Leisure centre.

To the South of these sites at Barfield Park there are rows of single storey bungalows and therefore I do not believe that the safety risks in this area will be greatly increased by the current proposals for Daniel Close and Gravelly Crescent.

On this basis I am comfortable with the proposals and have no objection to either of the Planning Applications on the grounds of public safety and flood risk.

Southern Water

The developer is currently in consultation with Southern Water with regards to the proposed sewer diversion (reference DSA000000285). The details of the diversion should be agreed and approved by Southern Water before implementing on site.

Representations

3 letters of objection have been received on the following grounds:

- no alternatives have been offered to existing storage in the garaging
- loss of privacy through overlooking
- loss of light
- increased parking pressure
- southernmost house is too close to the boundary
- refuse collection needs to be adequately catered for
- concern regarding dust to neighbouring properties during construction
- hours of works should be controlled

1 letter of comment has been received requesting that safe access to existing properties is maintained during the construction process.

Relevant Planning Policies and Guidance

Adur Local Plan 2017

Policy 2: Spatial Strategy, Policy 3: Housing Provision, Policy 15: Quality of the Built Environment and Public Realm, Policy 18: Sustainable Design, Policy 20: Housing Mix and Quality, Policy 22: Density, Policy 28: Transport and Connectivity, Policy 30: Green Infrastructure Policy 31: Biodiversity, Policy 36: Flood Risk and Sustainable Drainage

Development Management Standard: Space Around Dwelling and Flats

National Planning Policy Framework

Relevant Legislation

The Committee should consider the planning application in accordance with:

Section 70 of the Town and Country Planning Act 1990 (as amended) provides that the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant

local finance considerations, and other material considerations; and

Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

The main issues in the determination of the application are the principle of development, the effect of the proposal upon the visual character of the area and the amenities of neighbouring properties, the loss of parking and impact upon highway safety and whether concerns regarding flooding and drainage issues have been adequately addressed.

Principle of Development

Members will be aware that the Council is actively looking at redeveloping garage sites with similar applications, for example, at St Giles Close, Shoreham and Sylvan Road, Sompting already coming before the Committee for determination. Given that the garage sites such as this are within the built-up area as defined by the Local Plan and represent brownfield sites, they are the type of site which should be considered for redevelopment, especially considering the difficulty in meeting the housing needs of the District due to its physical constraints of being located between the National Park and the sea. In principle, therefore, it is not considered there is any objection to the proposed development.

Impact on the character of the area and amenities of neighbouring residents

The application site is not particularly prominent in the street scene as it can only be viewed through the vehicular access to the site from Gravelly Crescent. Within the site itself it is of little visual merit and its somewhat irregular plot added to the many blocks of separate garaging provides an unappealing layout with many narrow passageways between and behind the garaging some of which contained rubbish at the time of the officer site visit, as well as some further rubbish in the main courtyard itself. In pure visual terms, therefore, the redevelopment of the site would clearly improve the character of the area.

As with the other garage sites considered by the Committee, however, the application site is surrounded by existing housing, the rear elevations of which presently face towards the single storey garages. While this is a not particularly attractive view, the introduction of largely 2 storey dwellings will clearly greatly contrast from the existing situation as a result of the application proposal and therefore the impact upon existing properties needs to be carefully considered.

Guidance in respect of distances between buildings is primarily contained within the Development Control Standard relating to the provision of flats and dwellings. This requires that usually a distance of 22m is the minimum required between facing principal windows in order to retain sufficient privacy. Where a principal window faces a solid obstruction a distance of 11m is required between the window and a single□ storey structure or 14m between a principal window and a two□storey structure, in order to allow adequate light to enter the windows. New dwellings should normally be

set at least a metre away from the boundary to avoid an appearance of overdevelopment.

Taking the proposed western block first, the nearest residential properties to the west in Shadwells Road have reasonable rear gardens of about 14 metres in length. The rear gardens of the proposed properties in the western block will have gardens of between 10 and 11 metres in length and accordingly there is a distance of 25 metres between the properties which complies with the guidance and is therefore considered to be acceptable. Further residential properties are to the south of the proposed block and concern has been raised from one of the residents in this block as to the impact of the proposed development by way of an overbearing impact and overlooking. Taking the latter point first, there are no windows proposed in the facing elevation concerned, and this can be controlled by condition, therefore no overlooking would occur. As with the dwellings to the west, these dwellings (in Gravelly Crescent) also have reasonably sized rear gardens of around 15 metres in length. The length of the rear gardens therefore exceed the required 14 distance between the rear and side of two respective dwellings and given there is also a gap provided to the mutual boundary of 2 metres at its widest point to provide access to the rear of the proposed dwellings, the distance between the properties exceeds the Council standard and is considered acceptable.

The dwellings to the north sit at an angle to the proposed western block and therefore the relationship is not as direct between the side and rear of the buildings. At the rear corner point of the northernmost proposed dwelling in the block, there is a distance of just under 14 metres, but as the site tapers, this distance increases towards the front of the building, with a side garden serving the new dwelling providing an additional buffer. Again, it is considered the relationship is acceptable, therefore.

The eastern block is in a slightly more constrained location as the application site is narrower and the gardens serving existing properties in Shadwells Road to the north are shorter at 10 metres in length. As a result, therefore, it would not be possible to meet the 14 metre side to the rear distance with the proposed quantum of development if the northernmost dwelling on this block were a dwelling. It is therefore proposed that a bungalow is provided to the northern end of the block, where the relevant standard is 11 metres. Again, with the length of existing gardens plus the necessity to provide a gap to the mutual boundary, this standard is met. There are no windows proposed in the northern elevation of the bungalow, and its proposed hipped roof further reduces its impact upon the dwellings to the north and hence its impact is considered acceptable. Beyond the bungalow, there will be 2 further houses proposed but would far exceed the required standard of 14 metres between side and rear dwellings. Because of the angle of the application site and its relationship to the nearest dwellings to the east, there is a comfortable distance on this side with the middle dwelling of the 3 having a rear garden in excess of 17 metres in length. As the rear gardens serving the existing properties to the east are in excess of 10 metres, the required overlooking distance is again met.

Because of the angle of existing and proposed dwellings, there is a more oblique relationship with the dwellings to the south east. The shortest distance between dwellings is 18 metres at an oblique angle and while the garden of 33 Gravelly Crescent is that which is closest to the application site, it will border a rear garden of the new development with the proposed dwelling itself being sufficiently further away

for there to be no adverse impact.

Accordingly, it is not considered there would be an adverse impact upon existing neighbouring properties and the application is considered to be acceptable in that regard.

Loss of Parking and impact on highway safety

Concern has been raised regarding the loss of garaging and the consequent impact upon parking on the area. It has been consistently found during surveys of the garage site that few of them are used for parking due to their size being too small to accommodate modern cars. It would appear that there is some parking pressure in the area given the grass verges appear to be used for parking especially in the evening, albeit the area seems quite well served with laybys allowing parking on both sides of the road in certain locations and, as the required parking surveys found, there does appear to be some limited capacity on the street.

While on some of the other garage sites, it appeared evident that vehicles are parked within the garage compound, but not in the garages themselves, and therefore would be displaced onto the road were the development to take place, this appears less prevalent in respect of the current site where it appears more convenient for existing residents to park on the road.

The proposed development would be served by 16 spaces which is considered adequate for the development and having regard to the guidance of the National Planning Policy Framework that development should only be resisted on highways grounds when the impact is severe, it is not considered that a refusal could be justified in this instance on such grounds.

Flood Risk and Drainage

The remaining issue therefore relates to flooding and drainage. Guidance provided within the National Planning Policy Framework (NPPF) stresses the importance of avoiding inappropriate development in areas at risk of flooding and where development is necessary in such areas it should be made safe for its lifetime without increasing flood risk elsewhere (para 160).

As Members are aware the Local Plan undertook a sequential, risk based approach to the location of development which took in all sources of flood risk. However, in view of the extent of housing need and the scarcity of land the Local Plan still had to allocate land at flood risk (New Monks Farm and Western Harbour Arm). The lack of land within the District meant that there were no sequentially preferable sites that could be allocated instead of these sites and the Plan still resulted in a shortfall of over 3,100 dwellings.

As this site is not allocated for development and falls within Flood Zone 3a there is a requirement for a sequential assessment to be undertaken as well as the exception test (set out below).

The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production

or at the application stage. To pass the exception test it should be demonstrated that:

(a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

(b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The sequential assessment requires a review of available sites for development with a preference for sites at lower flood risk to be developed first. The applicant (Adur Homes) undertook a review of all garage sites and those identified suitable for development are being progressed for development (including this site and the other garage site at Daniel Close appearing elsewhere on the agenda). As such there are no other Adur Homes sites that are capable of redevelopment in areas of reduced flood risk. Although there is scope to redevelop all or part of the Southwick Estate this land is not available as existing residents would need to be relocated and this site is likely to be progressed through the Local Plan review.

In terms of other potentially sequentially preferable sites your Officers have reviewed the brownfield sites submitted as part of Strategic Housing Land Availability Assessment (SHLAA) and have resolved that the only sites that are potentially available are coming forward for development anyway given the demand for housing within the District. These windfall sites were anticipated as part of the Local Plan process and as a result there would still be a significant shortfall of housing even if all SHLAA sites came forward.

In terms of the exception test, as amended, the submitted Flood Risk Assessment (FRA) demonstrates compliance with the second part of the test and no objections have been raised by our Engineers and the Environment Agency. The amended FRA provides sufficient comfort that the development would be safe from flooding over its lifetime and avoids increasing flood risk elsewhere. However, there was concern about the inclusion of the single storey dwelling proposed on the site.

The Environment Agency (EA) in response to the amended FRA did consider that any permission should include a restrictive condition preventing sleeping accommodation on the ground floor, which could not be complied with if the proposed bungalow was to remain part of the application. Further comments were therefore received from the EA who felt unable to recommend approval of the application unless the Council's own Emergency Planners raised no objection to the scheme. As also outlined above, therefore, comments were sought from the Safety and Resilience Manager who confirmed that he raised no objection to the scheme.

Given his comments, therefore, it is not considered that permission should be withheld on the basis of the inclusion of a bungalow in the scheme. As noted above, the provision of a house on the plot proposed for the bungalow would fail to meet the Council's distance standards between respective 2 storey dwellings. The proposed bungalow also provides an opportunity to meet a specific housing need. Given there are few such opportunities in the District to provide such housing and the need to make the most efficient use of a site such as this, it is considered that with the comments of the Safety & Resilience Manager, the bungalow's retention within the scheme can be

supported.

Conclusion

The proposed development will provide much needed housing in a brownfield, sustainable location on a site that is under-utilised and contributes little to the visual character of the area. The site is sufficiently large to ensure the relevant overlooking and overshadowing distance can be met and conditions can be imposed, as required by the government, to mitigate any adverse impacts of the proposal. The application is therefore considered to be acceptable.

Recommendation

GRANT permission subject to the conditions set out below:-

1. Approved Plans.

2. Full Permission.

3. No part of the development shall be first occupied until the vehicle parking spaces have been constructed in accordance with plans and details submitted to and approved by the LPA.

   Reason: To provide adequate on-site car parking space for the development.

4. No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details submitted to and approved by the LPA.

   Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.

5. No part of the development shall be first occupied until Electric Vehicle Charging spaces have been provided in accordance with plans and details submitted to and approved by the LPA.

   Reason: To provide EVC charging points to support the use of electric vehicles in accordance with current national sustainable transport policies.

6. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority.

   The approved Plan shall be implemented and adhered to throughout the construction period. The Plan shall provide the following details as a minimum:
   - the anticipated number, frequency and types of vehicles used during construction,
   - the method of access and routing of vehicles during construction,
   - the parking of vehicles by site operatives and visitors,
   - the loading and unloading of plant, materials and waste,
   - the storage of plant and materials used in construction of the development,

- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

7. Development shall not commence, other than works of site survey and investigation, until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, and the recommendations of the SuDS Manual produced by CIRIA. Winter groundwater monitoring to establish highest annual ground water levels and winter infiltration testing to BRE DG365, or similar approved, will be required to support the design of any Infiltration drainage. No building / No part of the extended building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details and the details so agreed shall be maintained in good working order in perpetuity.

8. Development shall not commence until full details of the maintenance and management of the surface water drainage system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturer's recommended design life. Upon completed construction of the surface water drainage system, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

9. Prior to commencement of the development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved in writing by the Local Planning Authority:

   (1) A preliminary risk assessment which has identified: all previous uses; potential contaminants associated with those uses; a conceptual model of the site indicating sources, pathways and receptors; and potentially unacceptable risks arising from contamination at the site.
   (2) A site investigation scheme, based on (1) above to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
   (3) The site investigation results and the detailed risk assessment (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
   (4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require

the express consent of the Local Planning Authority.

The scheme shall be implemented as approved above and, prior to commencement of any construction work (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a Verification Report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a 'long-term monitoring and maintenance plan') for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, and for the reporting of this to the Local Planning Authority.

10. The development permitted by this planning permission shall only be carried out in accordance with the approved Flood Risk Assessment (FRA) ('Sustainable Drainage & Flood Risk Assessment, Ref: 15945/03/HOP/SUDS, dated October 2022, V2.0, by HOP Consulting Limited) and the following mitigation measures detailed within the FRA:

    - Internal access to the upper storey of the blocks/buildings is to be maintained for the lifespan of the development and all sleeping accommodation is to be located on the First Floor and above, except for one unit providing a wheelchair accessible, level access bungalow dwelling (sections 5.4 & 5.5 of the FRA).

    These mitigation measures shall be fully implemented prior to occupation. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

    Reason: To ensure adequate mitigation measures are provided in an area at risk of flooding

11. Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 2015 as amended (or any Order revoking and re-enacting that Order with or without modification), no windows or other openings shall be formed in the northern and southern walls of the approved dwellings.

    Reason: To prevent overlooking and to comply with saved policy 15 of the Adur Local Plan.

12. No works or development shall take place until full details of all hard and soft landscaping works and the proposed times of planting have been approved in writing by the Local Planning Authority and all soft landscape works shall be carried out in accordance with those details and at those times. Any plants which within a period of five years from the time of planting die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

    Reason: To ensure adequate landscaping is provided

13. No development shall be carried out unless and until a schedule of materials and finishes to be used for the external walls (including windows and doors) and roof of the proposed building has been submitted to and approved in writing by the Local Planning Authority and the development shall be completed in accordance with the approved schedule.

    Reason: In the interests of visual amenity and to comply with policy 15 of the Adur Local Plan.

14. Notwithstanding the provisions of the Town and Country Planning General Permitted Development Order 2015 as amended (or any order revoking and re-enacting that Order with or without modification), the proposed dwelling shall not be extended [or any incidental building over 5 cubic metres in volume erected within its curtilage].

    Reason: In the interests of amenity and the environment having regard to the nature of the site and policy 15 of the Adur Local Plan.

15. The hours of construction to implement the development hereby permitted shall be limited to 0900 to 1700 hours Monday to Friday, 0900 hours to 1300 hours on Saturday and there shall be no working on Sundays or Bank/Public Holidays.

    Reason: In the interests of the amenities of neighbouring properties

16. Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water.

Informative

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE DG365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 40% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. The applicant is advised to discuss the extent of groundwater monitoring with the Council's Engineers. Further detail regarding our requirements are available on the following webpage https://www.adur-worthing.gov.uk/planning/applications/submit-fees-forms. A surface water drainage checklist is available on this webpage. This clearly sets out our requirements for avoiding pre-commencement conditions, or to discharge

conditions"