

Objection of Mr and Mrs Foreman-Lonn, owner/occupiers of 30 Mill Hill to application AWD/0146/25

While the principle of development of this site for a replacement dwelling is not objectionable, the current proposal is out of keeping with the character and appearance of the area, detrimental to local biodiversity and does not deliver sustainable development.

Mill Hill is an important walking, cycling and horse-riding route linking Shoreham town (and its train station and bus stops) to the South Downs National Park to the north. It has a semi-rural character on account of its lack of a footway, minimal street lighting, established boundary hedging and trees, and the reduction in density of development on the west side of the road as you travel north.

The site lies on the western side of Mill Hill. This side of the road has no street lighting and large plots, with the dwellings with dwellings generally sited away from boundaries affording most plots large side gardens and mature hedges and trees to the front boundaries. This results in a low density of development, which is reflective of it lying adjacent to open fields to the west. The eastern side of Mill Hill contains smaller plots and is a more continuous ribbon of development, reflective of it lying adjacent to the built-up area of north Shoreham to the east. Most properties however do retain wide verges and/or significant boundary vegetation, signifying a progressive change in character as you travel away from the more densely developed centre of Shoreham.

Indeed, the eastern side of Mill Hill contains 21 plots (23 if the sides of Nos. 1 and 2 Mill Hill Drive are included), while the western side contains just 10 properties (including no 13, which is a backland plot with only its access visible from the road). This demonstrates the significant difference in density between the eastern and western sides of the road.

The applicant's Planning Statement opines that the site is underutilised currently. However, it contains a 4-bedroom detached house, which is set in a similar width plot to others on this western side of Mill Hill. The Planning Statement erroneously states at paragraph 6.13 that the site is "underdeveloped and a visual anomaly given its large side garden". This pattern of detached houses in plots with spacious side gardens and low single storey out buildings is repeated all along the western side of Mill Hill. Only 3 of the properties on this side of Mill Hill (1a, 3 and 3a) lack a large side garden.

There are opportunities to reduce the width of the dwelling and retain some of the characteristic spaciousness of the site through redesigning the dwelling. It is a four-bedroom proposal. The existing, much narrower dwelling also contains four bedrooms. The swimming pool and large kitchen/dining area sought by the applicant could be accommodated in single storey side sections abutting a more compact two-storey section. The proposal contains a large central section of two storey height, containing only an entrance hall with voids at first floor level- wasted space which unnecessarily adds to the width of the two-storey section of the building.

At night, the western side of Mill Hill is very dark from just beyond the junction with Mill Hill Drive northwards. There is no street lighting on the west side of the road and very little lighting filtering through the established front boundary vegetation from the dwellings, other than at 2 properties on the west side of the road, which have recently installed extensive external lighting. These are Nos 1 and 1a (the Applicant's current dwelling), which are in stark contrast to the character of the rest of the road. If Officers are minded to approve a new dwelling at the application site, it should be subject to a condition preventing installation of any external lighting without the prior approval of the Council to maintain the existing character of the road at night.

During the day, the boundary vegetation and substantial side gardens on this western side of Mill Hill gives a distinctly rural character- passers-by would be forgiven for not knowing how many dwellings lie on the western side of Mill Hill as a result of the spaciousness of development and significant established vegetation. The existing and proposed street elevations (comparison at paragraph 6.9 of the Planning Statement) are misleading of the true appearance of the existing site, as the extent of existing boundary vegetation is entirely omitted from the drawing.

In light of the above, proposed development is not sympathetic to local character and is not visually attractive as a result of good architecture, layout and appropriate and effective landscaping (requirements of NPPF para 135). Rather than maintaining a strong sense of place and creating an attractive, welcoming and distinctive place (as required by para 135 of the NPPF), this proposal runs contrary to the existing semi-rural character of the site and the spaciousness of this western side of Mill Hill. Local Plan Policy 15 follows on from this, requiring development to be of a high architectural quality and respect and enhance the character of the site and the prevailing character of the area. It requires development to make a positive contribution to sense of place, local character and distinctiveness of an area. Again, for the reasons set out above, the proposed development fails to achieve this.

The proposal also appears to have no concern for the ecological impacts of the proposal. Although the Applicant has cited the self-build exemption to providing biodiversity net gain, this does not override the NPPF requirement for planning decisions to contribute to and enhance the natural and local environment by minimising impacts on biodiversity (para 187). This is reflected in Local Plan Policy 15, which is clear that development must respect the existing natural features of the site, including trees and biodiversity, and contribute positively to biodiversity.

The application is accompanied by an Arboriculture Statement, a Bat Survey Report and an Ecological Report. The ecological assessment notes that the on-site vegetation is of value and provides suitable habitat to support a number of species. It also forms part of the wider ecological network of habitats in the locality. It does assess this value as low, but this does not provide justification for removal of such extensive amount of existing, well-established vegetation. It recommends installation of wildlife pathways and compensatory planting for any vegetation removed to facilitate the works.

The ecological assessment did not observe bats roosting within the site, but did observe bat foraging and commuting activity within the site, and we can confirm that

we also see bats flying east-west through our property on the opposite side of Mill Hill from the application site. The bat activity report indicates that vegetation provides connectivity to the wider landscape and that roosting opportunities could be incorporated into the final design to enhance the habitat.

Contrary to this, the Tree Protection plan shows all vegetation on the rear and south side boundaries to be removed and all vegetation on the front boundary to the south of the existing access to be removed. Only 2 small shrubs are shown as being planted in replacement on the front boundary. This does not seem to accord with the recommendations of the Applicant's own ecologist.

The D&A Statement refers to 'lots' of new vegetation within the site, but it is not shown on the drawings how the substantial removal of most existing vegetation within the site and on its boundaries will be compensated for. The loss of vegetation is in stark contrast to the other sites in the vicinity of the application site on this northern section of the west side of Mill Hill, which are characterised by well-established screening hedges. The NPPF (para 136) notes the important contribution that trees make to the character and quality of the urban environment. The proposal clearly runs contrary to this, as well as harming local biodiversity.

The Bat Survey Report cites the negative impact that external lighting has on bats (shortening the time available for foraging by delaying their emergence time, causing them to move away from their established foraging grounds and creating light barriers which cause bats to become isolated from their foraging grounds). The bat activity report confirms that the current site is not well lit at night and that the development should maintain the site's value for foraging bats and minimise impacts from lighting associated with the new development. It recommends that this should be done by keeping artificial lighting to a minimum, particularly at site boundaries, using low level lights where external lights are necessary, directing lights at a low angle with minimal light spillage and not illuminating vegetation within the site.

Mill Hill is currently fairly dark at night, as it has street lighting only to the east side and most properties have minimal external lighting. However, the artist's rendering of the rear of the property included in the D&A Statement demonstrates that the excessive glazing will exacerbate light pollution and be detrimental to biodiversity, in addition to the front of the property which also includes a large area of glazing and removes the front boundary screening which could have softened this appearance. As stated above, the applicant's existing property at 1a Mill Hill has an excessive amount of external lighting illuminating each section of their boundary walls as well as uplighters in planted borders illuminating shrubs at night. If this were replicated at the application site, it would run contrary to the Applicant's own ecologist's recommendations.

Southern Water have stated that they are unable to comment on the proposal as there is insufficient information on the means of disposal of foul and surface water drainage, and the Council's own drainage consultants advise that the scheme should incorporate sustainable drainage systems, of which there are no indications in the application. The applicant fails to even answer the question on the application form under the heading of Assessment of Flood Risk requiring them to state how surface water will be disposed of. This is very important here, as rain results in a huge

amount of surface water running down Mill Hill, which only has a drain at the bottom of the road and is often blocked due to debris washing down the road. The increase in developed area and hard surfacing will serve to exacerbate this.

The artist's rendering of the rear of the dwelling included in the D&A Statement shows a great deal of hard surfacing in the rear garden, which appears to be large concrete slabs. This runs contrary to the principle of sustainable drainage systems and has the potential to increase surface water run-off from the site. The application drawings also lack any information on site levels- the site slopes down to the south and the extent of additional driveway at the front of the new dwelling and hard surfacing to the rear has the potential to increase run-off both onto the highway and to the neighbouring property to the south. An application should not be approved until more detail on existing and proposed site levels, the extent and type of hard surfacing within the site, and the means of sustainable surface water disposal have been provided.

The Planning Statement refers to sustainability measures and biodiversity enhancement, but there is scant detail on any of the drawings of these features. Given the lack of detail of biodiversity enhancement, landscaping and sustainability features, such as sustainable drainage, these should not be left to approval by condition. Information about how the proposal enhances sustainability and biodiversity should be provided at the application stage. Without firm evidence that the applicants intend to respect the existing ecological and biodiversity features of the site, the application should be refused.

Should Officers be minded to approve the application, it should be noted that Mill Hill is narrow in width and has no pavement. Therefore, construction vehicles (including operatives' vehicles and delivery vehicles) will need to park within the site and all storage of materials will need to be accommodated within the site. The verge to the opposite side of the site is not highway land and is maintained by occupiers of Nos. 28 and 30 Mill Hill. It is therefore not available for parking or storage of materials. Any planning permission should therefore be subject to a detailed construction management plan setting out locations for site operatives parking, materials storage and delivery times to avoid blocking access along Mill Hill at peak times.

We are also concerned about the notification process by the Council. We received a letter on 20th February 2025 notifying us that I had 21 days from the date of the letter to submit our comments. The letter was dated 11th February, thereby reducing the time that neighbours have to comment to just 12 days.

In conclusion, the NPPF requires new development to secure economic, social and environmental net gains, but it is not clear how this proposal achieves this. We therefore urge Officers to refuse the application and require the applicants to revise their proposals to ensure that any replacement dwelling here delivers sustainable development, does not exacerbate surface water runoff, is in keeping with the character of the area and not detrimental to biodiversity. We also feel that this application would be best determined by the Planning Committee in order to ensure transparency in the decision-making process.