Application Number: ADC/0370/07 Recommendation – REFUSE

Site: 12-18 Old Shoreham Road, Shoreham-by-Sea BN43 5TA

Proposal: Proposed residential development to provide 24 apartments and associated parking

The Application

The application site is located on the eastern side of Old Shoreham Road A283, immediately north of the railway. It comprises former railway land and is currently partially used as a car sales display site related to the main car sales site on the opposite side of the road.
The site consists of a hardstanding area at the front, on which cars are displayed. There are also a number of old sheds in this area. Beyond this, the level of the site rises up in tiers, being the embankment of a former railway line, the original bank still existing along the northern side of the site. The rear part is at least 3m above the site access level and there are some significant retaining walls still in place. The site is bordered to the south by the embankment of the existing railway line. To the east the site tapers to a small triangular area of land that is excluded from the application site but is in the same ownership.

It is accessed by a single vehicular access point which is currently gated and the front boundary is marked by a wire mesh fence. There is no other access. The A283 passes under the railway bridge to the south of the entrance. There are a number of residential properties to the north of the site, comprising three-storey flats in Buckingham Street and semi-detached houses fronting an unadopted accessway off Victoria Road.

Planning permission is sought for the erection of 24 flats in three conjoined blocks ranging in height up to five storeys (17 x 2 bed and 7 x 1 bed units). 25 car parking spaces are proposed, some of which would be in the undercrofts and three of which would be for disabled use. The site would need significant earthworks to accommodate the proposal, including the removal of much of the disused railway embankment. There would be a gated access road and some soft landscaping around the site, but no significant outside amenity space.

This is a resubmission of previous application ADC/131/07 which was withdrawn in order to address issues that arose including:-

- Flood Risk Assessment
- Site contamination survey
- Consideration of noise and sound mitigation measures
- Achievement of highways sight lines and Safety Audit requirements
- Substantiation of car park numbers and manoeuvring
- Design issues relating to the size, bulk, height and appearance of the proposal

- The need to retain trees
- Demonstration that there is no overlooking of neighbouring properties.

An earlier application (SU/20/06) for a 69-bedroom residential care home was refused in May 2006 on grounds of unacceptable flood risk to vulnerable persons, overdevelopment, unsatisfactory appearance and unresolved highway-related issues. A previous application for 75-bedroom care home had been withdrawn (SU/150/95).

Consultations and Representations

County Transport Planning Services: Object. In the absence of a Designer's Response to the Safety Audit (contrary to WSCC policy), the highway Authority is unable to determine the highway impact (road safety or otherwise) of the proposal.
NB. A Designer's response has now been submitted and further comments from WSCC are awaited.

County Planning Services: The Infrastructure officer comments that the development would be served by Shoreham Library, which would not be able to adequately serve the additional needs that it would generate. A financial contribution of £3,292 would be required. A financial contribution of £366 towards fire service infrastructure would also be required. No financial contributions to education are necessary. The local primary schools in the Shoreham locality would be able to cope with the additional pupils generated by the development. Secondary education in the locality is projected to be full but the number of additional pupils predicted to arise from the proposed development is not significant enough to require a contribution.

Environment Agency: Object. The submitted FRA is not in accordance with the requirements of PPS25, which recommends that flood risk should be looked at over the lifetime of the development. For residential accommodation, the Companion Guide to PPS25 recommends a lifetime of 100 years. As such the FRA should be assessed against the predicted 1 in 200 year surge tide level for 2107 and not 2060. The predicted 1 in 200 year surge tide level for 2107 is 5.5 AOD, 0.8m higher that that used. In view of the revised surge tide level the risk of flooding will be significantly greater than currently assessed. It would also appear that the sequential and exception tests have not been undertaken in accordance with PPS25. There is no evidence that the sequential test has been undertaken and the exception test has been based on the draft PPS25, not the final published version. The site is identified as being within Flood Zone 3b, "Functional Floodplain" within Adur District Council's own draft Strategic Flood Risk Assessment. Table D.1 within Annex D of PPS25 sets out the appropriate uses within this flood zone which do not include residential.

Southern Water: Initial investigations show that there is currently inadequate capacity in the local network to provide sewage disposal or surface water disposal to service the development. The proposed development would increase flows into the public sewerage system, and existing properties and

land may be subject to a greater risk of flooding as a result. Additional off-site sewers, or improvements to existing sewers, would be required to provide sufficient capacity for the development. Section 98 of the Water Industry Act 1991 provides a legal mechanism through which the appropriate infrastructure can be requested by the developer and provided to drain a specific location. Should planning permission be granted, the developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure.
It is recommended that the following condition be attached to any permission: "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water".

Sussex Police: The Crime Prevention Design Adviser states that the site lies in a medium risk area. The main entrance is gated for vehicles and pedestrians and these gates should be controlled and any trades button coded not timed. There will need to be adequate perimeter protection to the whole site. The present chainlink fencing is for demarcation only and is not secure. Weldmesh would be the preference with the front being iron railings topping a low wall, but care would need to be taken to ensure the railings are cranked back level with the front of the wall. Access to block A via the entrance to the platform lift area will need to be controlled. Ideally all ground floor windows will accord with BS7950 and have restrictors fitted if openers. Doors will need to conform to PAS024 and if any of the external doors open outwards they will benefit from hinge bolts. All external lighting will be important, both around blocks and in the courtyard.

Director of Services: The Environmental Health Officer states that the recommendations of the acoustic report should be incorporated into the development. With regard to contaminated land, no adverse comments but the soil near to the embankment with high lead levels should be required to be removed from site.

The Head of Housing Need considers that, in the absence of provision of a 35% proportion of the flats as affordable dwellings, as identified in the Adur Housing Needs Survey, the application should be refused. The proposal should include 8-9 affordable units of which two thirds should be for social rent and one third shared ownership.

The Waste Services Manager states that this site would be serviced by 2 x 26 tonne vehicles, one for residual waste, the other for recycling. The site entrance is by a narrow section of the A283 adjacent to the railway bridge and it is gated. Therefore in order for vehicles to gain entry the vehicles would have to stop on the main road whilst the gates are opened. Once on site it would be difficult for the vehicles to turn, which would require reversing movements in a residential area where there could be a risk of young children playing, particularly in school holidays. The width of the entrance does not have a footpath. This would mean the vehicles would have to stop under the buildings and allow for a width for safe working of 3.2m.

It would seem the best solution would be for the vehicles to stop on the A283 with the rear end parallel with the exit pathway. This would mean a bin manoeuvring distance of approximately 6m each way. The only problem with this is it would mean stopping on double yellow lines with the cab of the vehicle close to or under the railway bridge at a narrow section of road. This would create visibility problems for vehicles trying to exit the site. Ideally a site like this would have an entry and exit allowing a drive through.

Network Rail: To be reported (NB. has not previously objected but commented that railway infrastructure should be safeguarded).

Third Parties: 4 letters of objection received raising the following points:

- The height and design of the proposal are excessive, the same as previously, out of keeping and not inspiring;
- Very dominant – maximum height of three storeys should be used here to reflect local development;
- Overlooking (particularly from balconies) and overbearing;
- Loss of light;
- Loss of quiet enjoyment - noise and light pollution;
- Plans misleading as they do not accurately show the number of position of trees;
- The 'wild' embankment makes a valuable contribution to urban biodiversity;
- Remodelling of the embankment would have dramatic impact on the appearance of the site and development from Victoria Road;
- Overdevelopment with high density accommodation on an inadequate site;
- Overspill parking from second cars and visitors will put a strain on Victoria Road and other over-parked and unpoliced streets nearby;
- High density proposal but part of site left excluded, giving rise to concern about its future development;
- Landscaping unclear;
- Development of this site should be low-rise in keeping with the area;
- A more traditional style with pitched roofs of varying heights as achieved in the residential elements of Ropetackle and in the Smith's Yard proposal;
- This end of town should not be swamped with 4/5 storey Ropetackle or retirement home developments - would these even be considered in a more affluent area of town?

[NB. The resident of 15 Victoria Road has requested to speak at the Committee meeting]

Relevant Planning Policies and Guidance

Adopted West Sussex Structure Plan 2001-16 (WSCC 2005): LOC1, NE1-3, NE6, ERA1, ERA4-5, DEV1, DEV3-5
Adopted Adur District Local Plan 1993-2006 (ADC 1996): AG1, AG3, AP2-3, AP8, AB25-27, AT12, AH1-3 and Appendix 11 'Supplementary Planning

guidance' comprising Development Control Standard No. 2 'Space Around New Dwellings and Flats'
Adur Development Plan – Submission Core Strategy 2006-26 (ADC 2007): R1, STC3, H1-3, T3-4, CI2, ENV2-5, ENV10
Interim Supplementary Planning Guidance on Affordable Housing (ADC 2004)
Revised West Sussex Parking Standards & Transport Contributions Methodology (WSCC 2003 & ADC 2004)
'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)
PPG13 'Transport' (DTLR 2001)
PPG23 'Planning and Pollution Control' (ODPM 2005)
PPG24 'Planning and Noise' (DoE 1994)
PPS25 'Planning and Flood Risk' (ODPM 2006)

Planning Assessment

Policies and Land Use

The site lies within the built up area of Shoreham but is not allocated for any particular use or redevelopment. In principle, the proposed development for residential purposes accords with both Structure and Local Plan policies. In order to meet the housing requirements of the Structure Plan, it is necessary that a significant proportion of new residential development takes place by way of 'unidentified' small infill redevelopment sites such as this.

A key priority of recent policies, as contained in the Submission South East Plan, Structure Plan (NE6) and Submission Core Strategy (R1) is to attract appropriate new development, especially mixed use, in order to secure the economic as well as environmental regeneration of Shoreham. However, this site was not identified as a development opportunity in the Shoreham Renaissance strategy (March 2006).

Local Plan and Structure Plan policies encourage redevelopment and infilling to help meet the demand for dwelling houses suitable for small families, single persons, the elderly, as well as affordable housing, and to make best use of urban land. This is encompassed in Structure Plan policy LOC1 but it is on the proviso that 'the impact on the character of the area and the environment, resources and assets of the County is acceptable" (para a) and also in allocating sites in Local Plans, that account should be taken of 'the need to protect and enhance the qualities and characteristics of settlements which local communities value" (para d)

Policy DEV1, entitled high quality development, states that development should not be permitted unless the construction, layout, scale, appearance and landscaping are of high quality taking into account the need to, amongst other things, integrate with and where possible enhance adjoining land uses and minimise conflicts between land uses and activities; have regard to context including site characteristics, townscape/streetscape views into and

out of the site and building styles/materials; give high priority to pedestrians and reduce dominance of cars; create a high quality socially-inclusive adaptable environment; protect and enhance biodiversity; ensure energy efficiency; and meet the needs of service providers.

Policy DEV4 states (amongst other things) that development should not be permitted unless the travel needs it generates are met; it achieves safe and convenient access by choice of means of travel; it encourages and enables an increase in walking and cycling; and the number and impact of motorised journeys is minimised. DEV5 states that 'Development should not be permitted unless the level of parking is compatible with the need to avoid environmental or safety problems and the need is to encourage walking, cycling and the use of passenger transport where this is or can be a realistic alternative.

The relevant Local Plan policy AH2, related to housing development by way of infilling and redevelopment, expects development to be designed so that its appearance, character and scale create a pleasant place in which to live, is in keeping with and enhances the existing local environment with particular attention to the architectural form, height, materials, density and layout; respect for the natural features of the site, including trees, no unneighbourly effect on existing dwellings by loss of privacy, light, outlook or open amenity space; adequate access and parking arrangements (as required by AT12) and accordance with adopted standards (in this case the Council's DC Standard No. 2 'Space Around New Dwellings and Flats' 1996.) Policy AH5 states that there will be a presumption in favour of dwelling units that are suitable for smaller households but that regard should be had to the desirability of a mix of dwelling sizes and types.

Government policy guidance in PPS3 encourages best use of urban land for housing development, particularly affordable housing, at higher densities (avoiding developments at less than 30 dwellings per hectare) and 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 use of land without compromising the quality of the environment. Policy H3 of the Adur Submission Core Strategy requires a minimum density of 35dph with higher densities on appropriate sites in town centres (the text referring to densities over 70dph).

PPS3 also gives advice in relation to affordable housing stating that Local Planning Authorities should, amongst other things, 'set out the range of circumstances in which affordable housing will be required.' 'The national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower minimum thresholds, were viable and practicable.'

Policy AH3 of the Local Plan states that, 'The District Planning Authority will seek to negotiate the provision of a proportion of social housing and /or low cost housing on all other sites coming forward during the Local Plan period,

subject to site and market conditions, the type of development proposed, the character of the area and other important constraints. In all cases, planning permission will normally be subject to a legal agreement to this affect.

The Adur District Council Interim Supplementary Planning Guidance for Affordable Housing published in September 2004 is linked to Policy AH3 and states that 'an appropriate proportion, of the order of 30% of social and/or low cost housing on all suitable sites should be sought.

Policy H2 of the Adur Development Plan Submission Core Strategy states that a minimum of 35% affordable housing should be sought from developments of 10 dwellings or more, unless it can be demonstrated that the exceptional circumstances of the site make it unviable to do so. This derives from the Adur Housing Needs Survey.

Policy ENV3 of the Core Strategy relates to flood risk and states that the principles set out in PPS25 will be followed in assessing development proposals. Policy ENV4 of the Structure Plan resists development in flood risk areas. AP3 of the Local Plan states that new development in flood risk area should be appropriately designed which may include the location of habitable rooms above flood risk level.

Policy AG3 of the Local Plan states that major development will not normally be permitted unless the infrastructure directly required to service it can be made available at the appropriate time and DEV3 of the Structure Plan has similar requirements. Policy CI2 of the Core Strategy also endorses this point stating that, 'any development must include arrangements for the improvement or provision of infrastructure made necessary by the development.'

Visual Amenity, Streetscene and Character

Buildings in the vicinity of the site are predominantly two storey semi-detached and terraced houses in and around Victoria Road. There are also some three storey buildings including the directly adjacent three-storey block of flats in Buckingham Street and a three-storey block of flats at the northern end of Ropetackle to the south of the railway (NB. there are also some 4½ storey buildings within Ropetackle but not on the Old Shoreham Road frontage). There is a mix of styles and materials evident in the area, including a flat-roofed block of flats (Aston House) further north, but buildings are generally fairly traditional in appearance.

The proposed development would consist of 3 blocks ranging from three to five storeys high without habitable accommodation on the ground floor due to flood risk concerns. The buildings would be of contemporary design with flat roofs and a mixture of stone, brick, render, and timber weatherboarding treatments to the elevations and aluminium fascias and cladding. There would also be a number of balconies.

Design concerns with the size, bulk, height and appearance of the proposal were raised on the previous application. The buildings now proposed are almost identical to previously but, as the flood design level has been raised, the overall height of the buildings has increased and additional undercroft parking has been provided at ground floor level. The parking layout has been amended accordingly and some spaces have been moved away from the northern boundary to reduce the pressure on the trees there.

The current proposal is considered too large and dominant, particularly in the streetscene facing Old Shoreham Road. While there would be some soft landscaping, mainly around the edges of the site, the site area would be predominantly developed with either buildings or hardstanding. The proposed density is approximately 120 dwellings per hectare, which in principle is acceptable for sustainable town centre locations. The main concern is that in order to provide that density on this awkwardly-configured site and to maintain space from existing residential properties, the buildings are excessively large and high compared to the established character of the area and to recent development nearby.

The supporting statement says that the range of materials and balconies were used to capture the spirit of a well-established resort on the English Channel. A flat front elevation parallel to Old Shoreham Road has been avoided by creating, on plan, a stepped footprint, which together with the changes in height, were intended to create the appearance of several interconnecting buildings.

There are a number of (probably self seeded) trees along the northern boundary of the site and there is significant ivy growth over the fence and wall on the northern boundary. This provides a belt of greenery between the site and the houses to the north off Victoria Road. While this vegetation is not of high quality, it is important as the only vegetation of any significance on the site, which is predominantly surfaced. The supporting statement states that some of the trees would need to be removed but others would be retained where possible.

Residential amenity

Consideration must be given to the residential amenities of the occupiers of the surrounding properties and also the future occupiers of the proposed development.

There have been a number of objections on the basis of overlooking, loss of privacy and light and overbearing impacts on existing nearby dwellings. The space around and between dwellings/flats is an important factor in the creation of a pleasant residential environment, contributing to the individual character, identity and appearance of the area. It is also important to ensure the provision of adequate privacy and daylight to individual flats/dwellings. In infill and redevelopment schemes new buildings should respect the existing character and appearance of the area and ensure the retention of adequate privacy for and daylight to existing dwellings/flats. Development Control

Standard No. 2 provides guidance on appropriate space around new dwellings and flats.

The proposed development would consist of 3 blocks ranging from three to five storeys high with no habitable accommodation on the ground floor due to the flood risk concerns. There would also be a number of balconies. The closest residential properties are Flats 1-6 Buckingham Street and the houses at 17–19A Victoria Road. The end elevation of the Buckingham Street flats does not have any windows and would be approximately 12m from the closest part of the proposed buildings.

The Development Control Standard states that where a principal window faces a solid obstruction there should be 14m between the two for two storey structures. In this case the buildings are three and four storeys and the distance should normally be increased to allow for these heights and to ensure adequate light to enter the windows. In this respect, the proposal does not accord with the Development Control Standard. However, it is considered that the impact on light would not be excessive, being more affected by the trees on the northern boundary than by the relationship between the two buildings. It is however considered likely that there would be overlooking across the rear garden area of the Buckingham Street flats, particularly from the 5 storey elements of the proposal. While the trees on the northern boundary could provide some protection, it is not clear which trees would be retained as no tree report and detailed landscaping proposals have been submitted. In the event of approval full landscaping details, including trees to remain and measures for their protection, would be necessary.

Block C would lie approximately 33m from the front of the nearest houses at No's 19 and 19A Victoria Road. The Council's Development Control Standard states that a distance of 22m/28m should be required to give acceptable privacy between the facing principal rear windows of two-storey/three-storey (respectively) residential buildings but that the same degree of privacy is not expected at the front. Although a greater distance might be justified as necessary to take account of the increased height of Blocks B and C in relation to the Victoria Road houses, given that the front windows of these houses would be as much as 33m away, it is not considered that there would be unacceptable loss of privacy. There would be some screening from existing trees but again the extent of this is not clear. It is considered overall that the relationship of the proposed buildings is reasonable for an urban area such as this.

Noise surveys have been undertaken with sound insulation measures recommended (particularly relating to the window specifications). The supporting statement advises that the recommendations of the report would be adhered to. It is considered that in the event of planning approval a condition to require such sound insulation measures would be required in order to provide a reasonable standard of residential amenity for occupiers of the development.

No really usable outdoor amenity space is shown on the plans. The Development Control Standard guidance requires 20 square metres of usable space per flat for amenity purposes, consisting of either communal or individual spaces, but this has been relaxed on appropriate town centre sites.

There is a wedge of land at the eastern end of the site, which is in the same ownership but excluded from the application site. This land does not form part of the proposal and would be effectively 'land locked' if the proposal were to go ahead. Clarification of the intention for this piece of land has been requested but its use could be as amenity land for the proposed flats if the application were amended.

Access and parking

The site is in a sustainable location due to its close proximity to the town centre facilities and due to it being located on and close to frequent bus services, as well as a reasonable distance from the railway station. Parking is proposed at a ratio of one space per dwelling, which is considered acceptable and in accordance with the WSCC adopted standards, given the sustainable location.

There is concern that refuse collection lorries could not safely enter and leave the site as there is inadequate on site turning and if they wait on the A283 instead, it would be at a point where the road passes under the railway bridge and visibility would be further reduced by the lorries stopping in the road.

WSCC, as local highway authority, has objected to the application on the basis that no Designer's Responses in relation to the required Safety Audit were submitted and therefore the proposed development could not be adequately assessed in terms of its impact on highway safety or capacity. Designer's Responses have now been submitted and WSCC Highways has been reconsulted. Their further advice is awaited.

Flood Risk

The Environment Agency has objected to the application as originally submitted because the submitted FRA is not in accordance with the requirements of PPS25, which recommends that flood risk should be looked at over the lifetime of the development. Some further information has been submitted and the Environment Agency has been reconsulted. Their further advice is awaited.

Affordable Housing and housing mix

The proposal does contain a mixture of one and two-bedroom flats but there is no evidence of any mixture of types of tenure and no affordable housing has been proposed in the application . PPS3 states that a proportion of affordable housing should be provided as part of developments of 15 or more units. Although the Council's Supplementary Planning Guidance requires a minimum of 30% affordable units, the Adur Housing Needs Survey identified

that this should be increased to 35% and this is contained in policy H2 of the Submission Core Strategy. A 35% proportion amounts to 8.4 units of the 24.

The priority to be given to securing the provision of more affordable housing is emphasised by central Government in PPS3 'Housing'. The Adur Housing Needs Survey has identified the high degree of need and this is reflected in planning policies for housing provision. The Adur Housing Needs Survey update states that Adur needs 394 affordable homes per annum whereas an average of only about 40 have been achieved in recent years. There are 1,149 households on the Council's Housing Register of which 692 are families with children and 120 are in temporary accommodation.

Sustainable and Resource Efficient Buildings

Policy ENV2 of the new Adur Development Plan - Submission Core Strategy states that all developments of the scale proposed will be expected to provide a minimum of 10% of their energy requirements from on-site renewable energy generation unless it is demonstrated that this would render the scheme economically unviable or have significant adverse effect on the townscape. ENV4 states that measures will be required to ensure new buildings achieve efficient environmental performance and to meet the BREEAM 'very good' or equivalent (now level 3 of the Government's new Code for Sustainable Homes). Policy H3 also requires all new homes to be designed to 'Lifetime Homes' standards.
There is no indication that the proposal would meet any of these requirements.

Infrastructure

As required by Policy AG3 of the Adur District Local Plan, Policy CI2 of the Core Strategy and "The Provision of Service Infrastructure related to New Development in West Sussex – Part 1", new and improved infrastructure would be required in to service new development. In this case contributions are required in relation to sustainable transport infrastructure, library services and fire services.

Recommendation

REFUSE on grounds that:-

1. The proposal is unacceptable in that it does not relate sympathetically in form, scale and mass with the existing character of the locality and this, together with the proportion of the site that would be covered with hardstanding and the number of flats proposed, would be an overdevelopment of the site to the detriment of the local environment, conflicting with policies AG1 & AH2 of the Adur District Local Plan, LOC1 & DEV1 of the West Sussex Structure Plan and ENV5 and ENV10 of the Adur Development Plan Submission Core Strategy.
2. On account of the location of the site within a low-lying area and the absence of an adequate Flood Risk Assessment to demonstrate that

the flood risk to residential occupants is acceptable, the proposal is in conflict with the requirements of PPS25 and is considered not to accord with policies AP3 of the Adur District Local Plan, ENV3 of the Adur Development Plan Submission Core Strategy and ERA4 of the West Sussex Structure Plan.

3. The Local Planning Authority is not satisfied that the proposed development can take place without resulting in detriment to highway safety. The proposal does not comply with West Sussex County Council's adopted 'Safety Audit Policy' in that necessary information has not been provided and the proposal is consequently considered not comply with policy DEV4 of the West Sussex Structure Plan and AT12 of the Adur District Local Plan.
4. The proposal does not include adequate provision on the site for the turning of a refuse / recycling collection vehicle in a safe and satisfactory manner to the standard required by the Local Planning Authority and the proposal would be likely to lead to conditions detrimental to highway safety and residential amenity contrary to the policies of the West Sussex Structure Plan (DEV4-5, DEV1) and the Adur District Local Plan (AH2, AT12).
5. There is no evidence that the necessary proportion of the flats would be provided as affordable housing within the definition contained in PPS3 to meet the need for such accommodation as required by the Council's Interim Supplementary Planning Guidance for Affordable Housing and policies AH3 of the Adur District Local Plan, NE3 of the West Sussex Structure Plan and H2 of the Adur Development Plan Submission Core Strategy and PPS3 'Housing'.
6. There is no evidence that the necessary contributions would be made to improvements to sustainable transport, library and fire service infrastructure 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, AG3 of the Adur District Local Plan and T3 and CI2 of the Adur Development Plan Submission Core Strategy.
7. There is insufficient information to demonstrate that the proposed flats would be sustainable by achieving efficient environmental performance (at least level 3 of the Code for Sustainable Homes), by meeting the 'Lifetime Homes' standards, and by meeting a minimum of 10% of their energy requirements from on-site renewable energy generation (unless it is demonstrated that this would render the scheme economically unviable or have significant adverse effect on the townscape) as required by policies ENV4, H3 and ENV2 respectively of the Adur Development Plan Submission Core Strategy.

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