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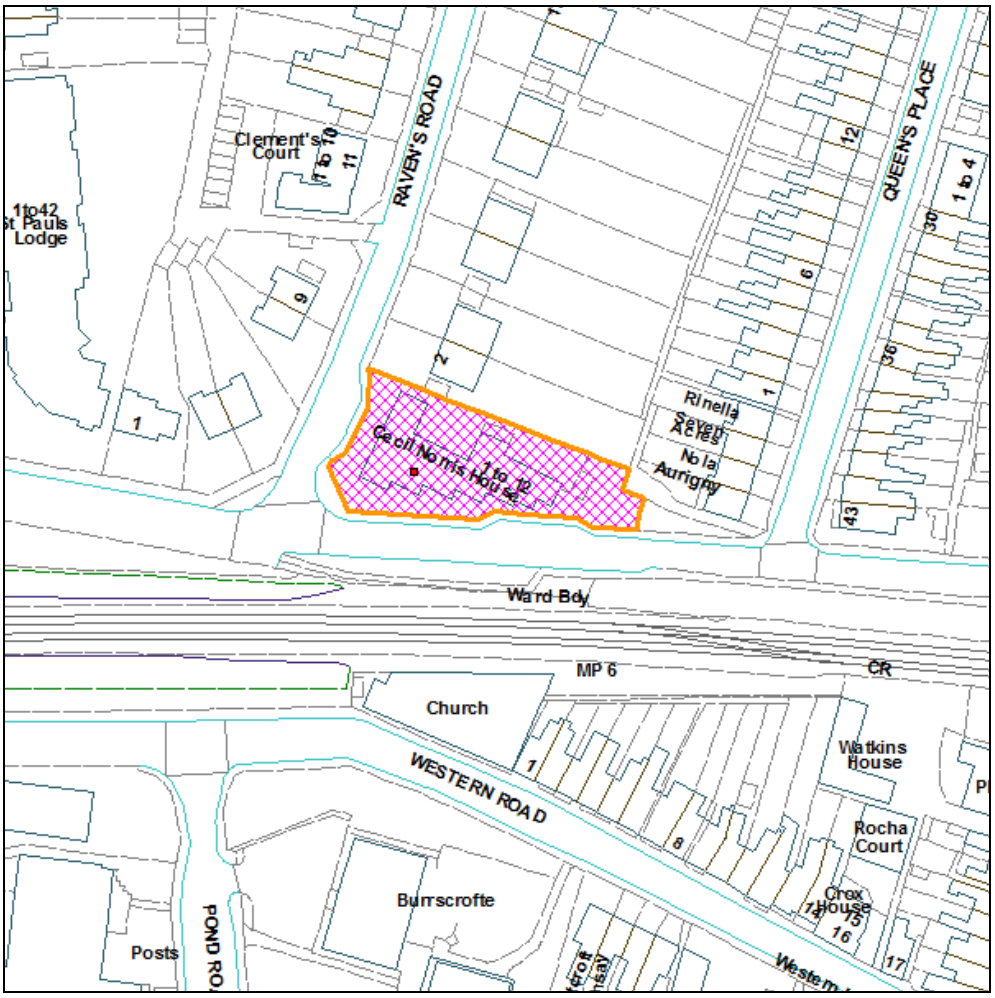
Application Number: AWDM/1742/18 **Recommendation: APPROVE**

Site: **Cecil Norris House, Ravens Road, Shoreham-By-Sea**

Proposal: **Demolition of existing building and construction of new building consisting of 5 x 1-bed flats and 10 x 2-bed flats over 3 levels, with associated parking, cycle and bin storage and landscaping.**

Applicant:	Mr Derek Beck, Adur District Council	Ward:	St Nicolas
Case Officer:	Gary Peck		



Not to Scale

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Proposal

This application seeks full permission for the demolition of the existing building, Cecil Norris House, and the construction of a replacement building consisting of 5 x 1-bed flats and 10 x 2-bed flats (15 units in total) over 3 levels which would all be affordable housing units. The 15 affordable units are stated to consist of 5 one bedroom flats, 8 two bedroom flats and 2 split level maisonettes with private garden area at the eastern end of the building. This is an increase of 2 units from the current provision on the site.

It is also stated that 'whilst some vegetation will be removed to facilitate the development the new building has been designed around trees of note, particularly the one on the south west corner of the site which will be protected and retained'.

The Planning Statement goes on to say:

The design process that has led to the application scheme has been considerable and set out in full in the Design & Access Statement. The design adopts a modern approach, incorporating green roofs, modern materials that reflect traditional materials nearby, being highly energy efficient and ensuring accessibility for all residents, whether able bodied or not. In addition it proposes two disabled parking spaces.

An initial design was presented to the local community at a public consultation event in September 2018, at this event a number of concerns were raised and the design subsequently amended in response. The main design revisions in response to comments received are:

- *Truncated windows to rear elevation to direct views.*
- *Windows with an internal cill lower than 1700mm on the north elevation are obscured.*
- *Western block moved south 2 metres away from No.2 Ravens.*
- *Planting to north elevation reduced to low level hedges.*
- *The green wall to the north elevation was extended to increase the proposal's green commitment,*

In addition to the design revisions to the building, a second parking survey was also undertaken in light of concerns raised over the level of on-site parking provision proposed. With regards to parking provision, the proposed development generates a demand for 3 normal car parking spaces but provides 2 disabled spaces. Whilst this is a shortfall of 3, the overnight parking demand survey showed there is on-street parking space for at least 46 cars, or 21 during the day – therefore this is not significant or to the detriment of neighbouring residents. It also provides an appropriate number of [8] cycle spaces

In respect of design, the Design & Access Statement (DAS) states:

we have combined a modern design and contemporary form with a classic material pallet that reflects the surrounding areas. By using a blend of bricks to create a shift in colour and shade from red wrapping round to white we were able to add more variety and colour to the design, while the use of a green wall helped to soften the view from

the neighbours onto the rear of the proposal. These colours feature both on the existing property and the surrounding areas, to help the proposal fit in more with its neighbours

The proposed materials are described thus:

Proposed walls Red/brown FL brick and a white brick to the rear (north facing) elevations, which is in keeping with the surrounding building materials. Particularly for 3-4 storey buildings of flats such as Longcroft and St Paul's Lodge on Southdown Road and Weppons Estate and the existing Cecil Norris House on Ravens Road.

Proposed windows: Composite timber and metal RAL 9004 (signal black).

Proposed doors: Timber (internal) and composite timber and metal RAL 9004 external.

Proposed Roof Sedum roof: the proposal should be seen as an asset to the townscape. Environmentally, the sedum roof will help promote the urban biodiversity lost by the existing hard stand in poor conditions. Furthermore, the Sedum roof will aid in reducing the impact from surface water run-off.

Proposed Balconies: Balconies are proposed to the south, east and west facing façades for private amenity space and solar gain. These will not detract from the building's exterior and are chiefly set within frames so as to not protrude much passed the building line.

A Daylight, Sunlight and Overshadowing study has also been submitted and is stated to follow the methodology and impact criteria set out by the BRE in its "A Guide to Good Practice Site Layout Planning for Daylight and Sunlight"

Site & Surroundings

It is understood that the existing building was built in the early 1970s as retirement housing and consisted of 12 studio flats and 1 x 2 bedroom flat. There was also a guest room, laundry and lounge. The building has been vacated since the submission of the application and now has hoardings around the site boundary.

The building sits on the corner of Ravens Road and is 2 storeys on its western side before dropping to a single storey on the eastern side along with a small garage and parking area. The building sits at a stagger to the road and is a brick building with white exterior cladding. As the site narrows to the east, there is only a very small eastern boundary. While the surrounding area is mixed in character, the existing building appears to have little in common with it.

The application site itself is outside of the Conservation Area, but immediately borders it on the southern side and eastern sides. Ravens Road itself to the north is not within the Conservation Area, but further to the west, Southdown Road is also within the Conservation Area.

Across the road, to the south of the site, is the railway line and Shoreham-by-Sea train station is about 150 metres to the east of the application site. To the east are terraced properties in Queen's Place. To the west, across Ravens Road, are residential properties, 2 semi-detached pairs and a single dwelling being closest to the application site. Further to the west is St Paul's Lodge, a 3 storey building set back from the road in line with the immediately surrounding pattern of development.

To the north is the property most clearly affected by the proposed development, 2 Ravens Road. This is a 2/3 storey residential dwelling with a large dormer in its roofslope facing south across the site as well as a single storey extension on its southern side partly containing a dining room with rooflights in its roof. The property also has patio doors and a conservatory with windows facing both east along garden and south towards the application site. As the properties in Ravens Road have much longer rear gardens than those in Queen's Place, the rear garden of number 2 runs almost the whole length of the northern boundary of the application site (a very small part is also shared with a property in Queen's Place), and the gardens in the properties beyond to the north are also of an equivalent length.

Relevant Planning History

None relevant to the determination of the application

Consultations

Planning Policy Section

The existing accommodation is owned by Adur Council and the proposal is to redevelop the site and increase the density of the development to provide 15 flats. Policy 21: Affordable Housing of the Adur Local Plan applies and requires 30% of the dwellings to be affordable. The application, submitted on behalf of the Council, states that 100% of the new dwellings will be affordable. This is to be welcomed and there is no policy objection to this proposal.

Adur District Conservation Advisory Group

This property (CN) was built in 1972 comprising 12 studio flats plus one 2 bedroom flat (for guests), providing a communal lounge, garden, laundry & guest facilities & as such provided ideal residence for Adur residents from the age of 60 upwards. It proved to be a resounding success by more importantly, allowing retirees an opportunity to downsize & still remain independent, supported by non-resident part time staff. It is also ideally located within walking distance of the town centre.

The property's design, although modern, settled easily within the neighbouring district, most of which is designated as a conservation area. In addition to which, the majority of C.N. House residents were neither car owners or drivers which was beneficial to the area in view of its location, i.e. its close proximity to Shoreham Railway Station where it has been & always will be, heavily congested with parked cars.

Adur D.C. decided, despite the popularity of C.N. House, to close it down & subsequently replace the building with a block of flats designed to provide affordable housing as per the aforementioned planning application AWDM/1742/18.

The new proposal is of an extremely modern design as can be seen from applicant's drawings. The design itself cannot be challenged apart from on basic fact, it does not in any way lend any synergy to the adjacent properties in the conservation area. It would be more suited in a location where there are properties of a much later design in order that it would blend in more easily.

The number of flats to be provided by the new development is 15 as opposed to the 13 lost by the demolition of C.N.H. This would raise an ethical question such as why homes for the older generation must be sacrificed for another generation. This is not the first occasion that Adur D.C. has followed this route. It would also appear contrary to the Government's latest proposals to encourage independent living of the retired community.

With regard to the new development, it should be noted that there will be three stories, admitted they will be set back so as not to impede on the street scene. However, the shadow cast by the resultant height of the building will impact on the neighbouring properties to the North, particularly on their gardens.

There is also a shortfall of off street parking facilities which will result in an exacerbation of on street parking, particularly in Hebe Road to the South of the development. (see para.2)

The actual design of the new development will not enhance the area. On the contrary, it will dominate not only the design but also the finish (colours), will conflict with the existing housing, bearing in mind this aspect alone is contrary to the ethos of Conservation areas.

Despite the optimism of design & access statement, it should be noted that over 40 residents have submitted written objections to the application, which should be taken into serious consideration by the Planning Committee.

It is appreciated that Adur D.C. is keen to comply with the housing targets set by H.M. Government as can be seen by the number of large developments proposed on the A.259 & elsewhere. However, there is a minimal gain in this instance & a greater sacrifice on the part of the older generation.

The unanimous conclusion of the ADCAG members is to recommend that this application is REFUSED.

Environmental Health

Having considered the acoustic report, I would recommend whole house ventilation with heat recovery be provided for those dwellings that need to keep windows closed to achieve internal noise level requirements. This will do away for the need for acoustic

vents in the Southern facade. I would suggest windows remain operable to allow for purge ventilation as recommended in the acoustic report.

Perhaps consideration could be given to powering the continuous mechanical ventilation systems from the communal power supply, which will be offset by the solar panels, so as to keep energy costs for residents to a minimum.

A demolition Notice under the Building Act 1984 will be required prior to demolition and the applicant should contact environmental health for this purpose prior to this work being undertaken.

Southern Water

Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer.

We request that should this application receive planning approval, the following informative is attached to the consent:

A formal application for connection to the public sewerage system is required in order to service this development, please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk. Please read our New Connections Services Charging Arrangements documents which has now been published and is available to read on our website via the following link https://beta.southernwater.co.uk/infrastructurecharges.

It is the responsibility of the developer to make suitable provision for the disposal of surface water. Part H3 of the Building Regulations prioritises the means of surface water disposal in the order

a Adequate soakaway or infiltration system
b Water course
c Where neither of the above is practicable sewer
Southern Water supports this stance and seeks through appropriate Planning Conditions to ensure that appropriate means of surface water disposal are proposed for each development. It is important that discharge to sewer occurs only where this is necessary and where adequate capacity exists to serve the development. When it is proposed to connect to a public sewer the prior approval of Southern Water is required.

Due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer now deemed to be public could be crossing the above property. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its condition, the number of properties served, and potential means of access before any further works commence on site.

The applicant is advised to discuss the matter further with Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk".

West Sussex County Council Lead Local Flood Authority

West Sussex County Council (WSCC), in its capacity as the Lead Local Flood Authority (LLFA), has been consulted on the above proposed development in respect of surface water drainage.

The following is the comments of the LLFA relating to surface water drainage and flood risk for the proposed development and any associated observations and advice.

Flood Risk Summary

Modelled surface water flood risk	Low risk

Comments:

Current surface water mapping shows the proposed site is at low risk from surface water flooding although there are areas adjacent to the site at higher risk.

This risk is based on modelled data only and should not be taken as meaning that the site will/will not definitely flood in these events.

However the surface water management strategy should consider this risk and suitable mitigation measures with any existing surface water flow paths across the site maintained.

Reason: NPPF paragraph 163 states – 'When determining any planning application, local planning authorities should ensure flood risk is not increased elsewhere.'

Therefore, a wholesale site level rise via the spreading of excavated material should be avoided.

Modelled ground water flood risk susceptibility	Low risk

Comments:

The area of the proposed development is shown to be at low risk from ground water flooding based on the current mapping.

Ground water contamination and Source Protection Zones.
The potential for ground water contamination within a source protection zone has not been considered by the LLFA. The LPA should consult with the EA if this is considered as risk.

Records of any historic flooding within the site?	No
Comments: We do not have any records of historic flooding within the confines of the proposed site. This should not be taken that this site has never suffered from flooding, only that it has never been reported to the LLFA.	

Ordinary watercourses present?	No
Comments: Current Ordnance Survey mapping shows no ordinary watercourses within the proposed development area.	

Future development - Sustainable Drainage Systems (SuDS)

No FRA or Drainage Strategy has been included with this application. The majority of Section 12 (Assessment of Flood Risk) of the Application Form has been left blank.

In line with Defra's non-statutory technical standards for sustainable drainage systems, for a brownfield site such as this, the peak runoff rate and runoff volume should be as close as reasonably practicable to the Greenfield runoff rate/volume from the development for the same rainfall event. If this is not possible, significant betterment, at least 50% reduction in rate from the peak pre-redevelopment rate, should be achievable.

Please refer to our Policy for the Management of Surface Water https://www.westsussex.gov.uk/media/10391/ws_llfa_policy_for_management_of_surface_water.pdf

Following the SuDS hierarchy and the spirit of SuDS implementation, betterment for surface water systems on the new developments should be sought. This could include retention at source through green roofs, rain gardens, permeable paving and swales prior to disposal to reduce peak flows. SuDS landscaping, could significantly improve the local green infrastructure provision and biodiversity impact of the developments whilst having surface water benefits too.

Please note that Schedule 3 of the Flood and Water Management Act 2010 has not yet been implemented and WSCC does not currently expect to act as the SuDS Approval Body (SAB) in this matter.

Technical Services (initial comment)

Thank you for letting me comment upon this application. I initially asked you to obtain further details for the proposed site drainage – this has now been provided.

The site lies in flood zone 1; it may suffer in the south east corner with surface water flooding but from my investigations has not suffered flooding in the past.

The existing site has no dedicated surface water drainage provision which is common in the Adur area. There is however a foul drain in Raven's Road and a combined sewer in Hebe Road.

The existing buildings are to be demolished to make way for the new build. This new build will increase hard standing in the area and therefore increase surface water runoff.

Once the site is cleared there is no reason why an infiltration test cannot be undertaken – indeed this is alluded to in the Sustainable Drainage Statement:-

Infiltration testing is programmed to be carried out and if testing does prove to be favourable then we would advocate that an infiltration drainage system is pursued in line with the Building Regulations hierarchy and designed in accordance with all relative regulatory standards where applicable.

The report then goes on to say:-

Based on the above, it is concluded that the surface water run-off from the post developed site will be managed using cellular storage wrapped in impermeable geomembrane in the disabled parking bays and a retention of stormwater in the void former of the green roof's layers. Due to space restrictions, the size of the cellular storage units it is limited to the proposed disabled parking bays and will be based on the allowable discharge, which is currently proposed at a 2.0 l/s. The storage provided in the green roof's layers known as BluRoof system will provide valuable additional drainage capacity. To control the maximum permissible discharge of stormwater restriction devices are included at all the roof outlets where applicable.

This proposal is unacceptable because the plan accompanying the statement clearly shows that the proposal is to connect to the Public Foul Sewer, rather than the Combined Sewer. And the controlled discharge limited to 2l/s only applies to the southern side of the building the northern side discharges via chambers S8 – S1 unrestricted. Which means the peak flow from the site will be well in excess of 2l/s. There is no agreement to this volume of discharge from Southern Water. Indeed there is no acceptance by Southern Water to take any site flows

Connection to either sewer must be approved by SWS.

Therefore I **object** to this application

Once the following information is provided I will reconsider my objection

1) Confirmation of infiltration rate derived from onsite tests.
2) Letter approving connection and volume discharge rate to the sewer be it Foul or Combined – this assumes infiltration is not an option for all surface water disposal

The applicant responded to this objection with the following additional information

Existing conditions

The site currently discharges foul and surface water via a 100mm diameter lateral connection to the Southern Water public sewer located the west of Cecil Norris House in Ravens Road. This sewer is shown on Southern Water's sewer record as a foul sewer, however, the details submitted previously by Scott White & Hookins (SWH) show that both foul water and surface water discharge to this sewer via the private on-site combined drainage system.

The sewer record indicates that a combined sewer pressurised rising main is located under the highway to the south of the site. There are no surface water sewers shown in the vicinity of Cecil Norris House.

The existing peak flow rate to the public sewer is limited by the pipe diameter, gradient and internal pipe roughness. SWH's information shows that the lateral connection to the public sewer is 100mm diameter and, although the pipe gradient is not known, construction practices would allow a minimum gradient of 1 in 100 to ensure adequate velocity is maintained. Using published pipe flow tables, with a roughness coefficient of 0.15 for foul water flow, the existing peak flow has been calculated at 7.03 litres/second.

This incorporates foul and surface water flows from the existing residential units. Sewers for Adoption suggests a peak foul water flow rate based on 4,000 litres per residential unit per day. For the existing 13 units at the site, this equates to a peak foul water flow rate of 0.60 litres/second.

Surface geology at the site is shown on the British Geological Survey (BGS) online mapping resource as being deposits of Head – Clay, Silt, Sand and Gravel. The BGS website also indicates locations of available borehole information and there is a log shown immediately south of Cecil Norris House. This log (from 1991) confirms Head deposits of stiff to firm Clay to a depth of 6.25m below ground level where the borehole was terminated.

Proposed drainage strategy

Sustainable Drainage (SuDS) proposals have been considered in line with the Building Regulations Part H3 which requires rainwater to discharge to the following listed in order of priority;

a) An adequate soakaway or other infiltration system; or, where that is not reasonably practicable,
b) A watercourse; or, where that is not reasonably practicable,
c) A sewer.

The geological conditions underlying the Cecil Norris House site do not appear favourable to the installation of soakaways or infiltration SuDS techniques. The presence of combined sewers in the wider area of this part of Shoreham-By-Sea and the use of an existing combined drainage system at the site indicate that infiltration SuDS are not used to manage surface water runoff locally. Furthermore, Building Regulations require soakaways to be placed a minimum of 5m away from buildings. The existing building footprint would prevent the use of soakaways as there is not a 5m margin between the building line and the property boundary.

With the new building proposed to occupy a similar footprint to the existing block, the use of soakaways would also be precluded due to the 5m minimum distance requirement.

Given the site geology and the form of the proposed development, the use of infiltration SuDS as in a), above, is not considered reasonably practicable for the development

There are no watercourses close to the Cecil Norris House site that would offer a reasonably practicable discharge point for surface water from the proposed development, therefore method b) above is not considered feasible.

Using the hierarchy of rainwater disposal as above, a discharge to the public sewer, as c), is considered the remaining option for surface water management for the proposed development. A connection to a rising main cannot be made and therefore the existing connection to the public sewer, indicated as a foul sewer on the sewer record, is proposed to be re-used.

Any discharge to the public sewer will need to be approved by Southern Water and the sewerage undertaker will accept surface water flows to the sewer if it can be demonstrated that reduction of the existing flow rate can be achieved and that there are no other feasible alternative options to surface water disposal. Southern Water will only process a Section 106 sewer connection application once planning consent is approved and this connection application cannot be made at the current time.

To provide a reduction in flow to the public sewer, an attenuation SuDS scheme is proposed with surface water discharge limited to 2 litres/second. This rate is considered the minimum flow at which a self-cleansing velocity can be maintained and is shown to be 5.03 litres/second less than the existing peak flow rate from the site (28% of the existing flow rate).

To achieve this flow reduction, a shallow attenuation tank is proposed to be located in the communal rear open space of the development, as shown on the attached drainage layout drawing, with the outflow to the downstream sewer restricted through the installation of a Hydrobrake flow limiting device. This attenuation tank has been sized to accommodate all storms up to the 1 in 100 year event with an additional 40% rainfall intensity allowance to account for the effects of climate change for the lifetime of the development. This is in line with the parameters set out in the non-statutory technical standards for SuDS.

As can be seen, the drainage proposals are for a separate drainage system for foul and surface water which combine downstream of the Hydrobrake chamber at the last manhole on site before connecting to the public sewer in Ravens Road via a new manhole. The peak rate of foul water discharge to the public sewer from the proposed 15 residential units has been calculated at 0.69 litres/second, an increase of 0.09 litres/second.

MicroDrainage calculations have also been provided in the attached information to demonstrate the capabilities of the proposed system to limit the surface water runoff flow rate from the whole of the proposed impermeable area of the development to the sewer.

I hope that this additional detail and clarification of the proposed drainage strategy shows that surface water runoff can be managed sustainably for the design lifetime of the Cecil Norris House development and provides you with sufficient detail to review the current objection.

Technical Services (further comment)

I can confirm that the foregoing is exactly the information I require and therefore I withdraw my objection

West Sussex County Council Highways

West Sussex County Council, in its capacity as the Local Highway Authority (LHA), have been consulted on proposals for demolition of existing building and construction of new building comprising 5 x 1-bedroom and 10 x 2-bedroom flats (social housing) with associated car and bicycle parking.

Ravens Road is unclassified public highway subject to a 30 mph speed restriction. The site is located on a junction corner and there are comprehensive double yellow line road markings on the nearby road network. There is limited on-street parking on the southern side of the carriageway and a layby on the north side of the carriageway, directly west of the existing vehicle crossover (VCO).

The application is supported by technical drawings, Design & Access Statement (DaS) and Transport Statement (TS). The LHA does not wish to raise transport grounds to resist the application subject to comments and conditions below.

<u>Access</u>
Vehicular access to the development will remain as per the existing VCO. Whilst the application form states that access to the public highway will be altered an inspection of the proposed plans and local mapping reveals that no alterations to the existing VCO would be required to access the 2 x disabled parking bays. I note that the Site Plan indicates areas of landscaping either side of the parking spaces. Obstructions to visibility within these areas should be kept to a height of no more than 0.6m, 2 metres back into the site, to allow for visibility of pedestrians on the adjacent footway. Details of pedestrian visibility splays can be secured via condition.

Whilst there is no turn on site available, space as existing appears restrictive for this. The LHA has reviewed data supplied to WSCC by Sussex Police over a period of the last five years. There have been no recorded injury accidents in the vicinity of the site access. There is no evidence to suggest that the access or existing parking arrangements are operating unsafely. Whilst on-street parking in the layby is immediately adjacent, Manual for Streets 2 (MfS2) paragraph 10.7.1 states that *Parking in visibility splays in built-up areas is quite common, yet it does not appear to create significant problems in practice…in some circumstances, where speeds are low, some encroachment may be acceptable.* Furthermore the presence of on-street parking and residential nature of the nearby road network means that slow speeds are anticipated along Ravens Road.

Parking

The TS refers to 3 x unallocated spaces being provided for the development however the plans indicate that 2 x disabled spaces only will be provided. Parking provision has therefore been assessed on the basis of no allocated spaces being provided for the development.

The disabled parking bays are only 4.8m in length and 3.3m wide. Department for Transports *Inclusive Mobility* sets out that off-street parking bays perpendicular to the access aisle should include 1.2m extra space to the rear for access and extra 1.2m *either side* of the bay. The bays should be amended; details of this can be secured via condition.

The TS states that the shortfall in parking provision is three spaces, however on the basis of no allocated spaces being provided the WSCC Car Parking Demand Calculator (PDC) estimates a demand for six spaces for a development of this scale and location. A Car Parking Capacity survey has therefore been undertaken to assess whether the shortfall in parking at the development site would cause an issue to additional on-street parking in the vicinity. Roads within at least 200 metres from proposed development were included to survey parking availability between 2 am and 5 am on a weekday morning, when most residential demand would be expected. This found that the closest roads (Ravens Road and Queens Place) had a spare capacity of 46 spaces, a parking stress of only 34%. Additional parking surveys were also undertaken 0700-0900 and 1700-1900 on a weekday for peak commuter parking demand in vicinity of Shoreham Station. This found that 21-29 spaces were available on the closest roads. The LHA therefore do not raise a concern from a highway safety perspective in the shortfall of six spaces.

Refuse collection and emergency access will be via roadside as per existing arrangements. Refuse vehicles can reach within 25m of collection point as per MfS paragraph 6.8.9 and a Fire Appliance can reach within 45m of all points of the proposed building.

Capacity

A Trip Rate Information Computer Systems (TRICs) database assessment was undertaken on the trips anticipated with the previous use and any increase proposed with the new development. The existing housing with 13 x 2-bedroom retirement flats could see 25 daily 2-way movements with 1 movement in the AM and PM peak respectively. The proposed development could see 28 daily 2-way movements with 2 in

the AM and 3 in PM peak. The impact to vehicle trips is therefore not considered 'severe'. Also considering less parking is proposed and the sustainable location of the site, the development is inviting to residents without cars who may utilise nearby public transport.

Accessibility
WSCC bicycle parking standards state that in a communal facility the flats should have 0.5 spaces each. Eight spaces will therefore be provided. Considering the sustainable location and restricted car parking the applicant may wish to provide one space per flat. Details of this can be secured via condition. The local road network is conducive to walking and cycling with street lit low speed carriageway and footway and a number of retail, services and amenities in Shoreham, within walking distance.

Shoreham Train Station is approximately 2 minute walk distant with various regular services to Brighton, Worthing and London Stations. The closest bus services are also from Shoreham Train Station with regular services to various villages and towns. The LHA are satisfied that not all daily trips would be required to be by private car and thus the proposals meet with paragraph 108 of the National Planning Policy Framework (NPPF) in that opportunity to promote sustainable transport can be made.

Construction Phase
Matters relating to access during the construction of the proposed would need to be agreed prior to any works commencing. Vehicular access to the site is possible only from Ravens Road. A comprehensive construction management plan should be submitted. This should set out the controls to be implemented throughout the construction project to ensure that safety of users of the public highway, as well as its operation, is not detrimentally affected. The construction management plan should amongst other things set out how deliveries are to be managed along Ravens Road in light of the carriageway width and presence of other vulnerable road users.

Conclusion
The LHA does not consider that the proposal would have 'severe' impact on the operation of the Highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 109), and that there are no transport grounds to resist the proposal.

Representations

42 objections have been received: 12 from addresses in Ravens Road, 1 in Queens Place, 11 from other addresses in Shoreham, 6 in Hove, 4 in Lancing, 4 in Southwick, 1 each from Upper Beeding, Brighton, London and Bristol.

The objections are made on the following grounds:

- a 3 storey building will reach the roofline of neighbouring properties
- solid block with a flat roof will be out of keeping with the nearby Conservation Area
- inadequate parking provision

- West Sussex County Council Transport Plan states that parking problems often occur near railway stations
- overdevelopment of the site
- green wall/sedum roof would not be adequately maintained and threatened by seagulls
- a 2 storey development would be more appropriate
- inadequate external space around the building conflicts with policy 22 of the Local Plan
- the lighting survey is inadequate as ground floor conservatory and windows on the neighbouring property were not taken into account and were inadequately described as a lean to
- loss of light to the neighbouring property would occur 9 months per year
- overbearing development to neighbouring properties
- the site coverage is excessive compared to surrounding developments
- other brownfield sites are more appropriate for a development such as this
- a private application would not be approved as it conflicts with planning policies
- the proposed materials are not in keeping with the surrounding area
- loss of historic view to the centre of Shoreham including the Church
- like other new developments in Shoreham, this proposal lacks sensitivity
- existing building does not result in overlooking as only corridors face neighbouring properties
- would be taller than the Shoreham Centre
- the site has been previously rejected from the SHLAA as would not result in a net increase in dwellings
- loss of trees
- the traffic survey is misleading
- adverse impact upon the Conservation Area

Following the submission of further lighting information from the applicant, a further objection was received from the occupiers of Ravens Road on the grounds that the fenestration in the eastern elevation of the property had still been ignored and that the survey states that the rear part of the property is not the main living space which is incorrect. The term lean to used by the developer is an incorrect and misleading term when used to describe a house extension. The strong objection to the negative impact upon the property remains.

1 letter of support has been received stating that it is hoped that the building will provide adequate disability access

Relevant Planning Policies and Guidance

Adur Local Plan 2017: Relevant policies include 1, 2, 3, 11, 15, 17, 18, 20, 21, 22, 28 & 30 & 34.

Development Control Standards – Space Around New Dwellings and Flats

National Planning Policy Framework (CLG 2018)

Planning Practice Guidance (CLG 2014)

Relevant Legislation

The Committee should consider the planning application in accordance with:

Section 70 of the Town and Country Planning Act 1990 (as amended) that provides 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

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

Although a high number of objections have been received in respect of the application, very few specifically oppose the principle of development. Member will be aware, as set out in the Local Plan, that there is a shortfall in housing in the District and a pressing necessity to provide affordable housing. It has been evident in recent months that the private housing schemes that are presented to the Committee for consideration often fail to achieve the amount of affordable housing required by the Local Plan primarily for viability reasons, and accordingly the provision of a fully affordable housing scheme is considered quite clearly acceptable in principle. The National Planning Policy Framework seeks to ensure that a *sufficient number and range of homes can be provided to meet the needs of present and future generations* an objective which this application can potentially help achieve.

Furthermore, the existing building, Cecil Norris House, is over 40 years old and hence no longer provides facilities expected in current times. Upgrading the building would no doubt prove uneconomic but, in any case, and leaving aside the specific details of the current application for the moment, the existing building in visual terms with its flat roofs and use of cladding, does not reflect the character of the surrounding area. It is also felt, therefore, that there can be no objection to the principle of removing the building and its replacement with a more modern facility.

In location terms, the application site is close to the centre of Shoreham and therefore in walking distance of its facilities, as well as being within 200 metres of the railway station and bus routes. The site is therefore sustainably located and the provision of additional housing again can be supported as a matter of principle. Members are reminded that the NPPF retains its presumption in favour of sustainable development.

The location of the site leads to consideration of the first issue of major concern among those who have made representations to the plan regarding the lack of parking provision on the site.

The submitted plans show the provision of 2 disabled parking spaces on the site and the County Council has confirmed that the development would require the provision of 6 parking spaces and accordingly there is a shortfall in the parking provision proposed. It is quite evident from daytime visits to the application site and its environs that there is often parking pressure in the locality because of the proximity to the railway station and the ability for commuters to park close by. The narrow nature of Queen's Place to the west adds to this parking pressure.

However, it must be remembered that government advice as contained in the NPPF is quite clear. Paragraph 103 requires that there a genuine choice of transport modes which would be the case in respect of this proposal. The NPPF further states that in assessing specific applications for development, it should be ensured that appropriate opportunities to promote sustainable transport modes can be taken up, given the type of development and its location which would again be the case in this application. Paragraph 110 goes on to say that applications for development should give priority first to pedestrian and cycle movements, and, so far as possible, to facilitate access to high quality public transport.

At paragraph 109, the NPPF states that '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.* The County Council as Highways Authority has concluded that the impacts of the development would not be 'severe' and in light of that finding and the clear government guidance contained within the NPPF, your officers, while recognizing the understandable concerns of local residents and others in respect of highways and parking matters, conclude that there is no justifiable reason to resist the development on highways grounds especially when assessed against the matters of principle outlined earlier.

Chapter 11 of the NPPF is entitled 'Making effective use of land' and paragraph 117 states '*Planning policies and decisions should promote an effective use of land in meeting the need for homes'.* At paragraph 119, if further states *Local planning authorities…should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including…held in public ownership, using the full range of powers available to them'*. These paragraphs suggest therefore, and particularly against the background of the location of the development, that a more intensive use of the site would be in line with government guidance. The NPPF then indeed goes on to deal with 'achieving appropriate densities' at paragraphs 122 and 123:

Planning policies and decisions should support development that makes efficient use of land, taking into account: a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it; b) local market conditions and viability; c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places.

123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site…

…local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)

A number of residents have raised concerns regarding the scale of the development, albeit some of these comments are made in the context of the parking provision considered above. Your officers do feel that it is a matter of fact that the existing building is lower than those immediately around it because of its flat roofed nature. The southern facing dormer of number 2 Ravens Road is quite clearly visible above the subject building for example and is effectively a 3 storey building at that point. Although a number of other buildings in the vicinity are 2 storeys, these mainly contain pitched roofs and are therefore higher than the subject building, whilst just to the west is St Paul's Lodge a far more substantial 3 storey building although with limited impact upon the street scene.

Your Officers, therefore, consider that the principle of making a more effective use of the site, for an identified housing need, is fully in line with government guidance.

In design terms, the character of the surrounding area is somewhat mixed and the corner nature of the site sitting between the far more dense Queen's Place to the east and the greater spacings of Ravens Road to the north and Southdown Road to the west is considered to give some freedom to the proposed design of the building. It is not considered that there is any objection to a more modern and contemporary design and, as stated in the Design and Access Statement, the proposed use of a blend of bricks as well as the use of a green wall will allow the development in design terms to assimilate successfully into is surrounds.

The building will step down from 3 storeys at the western end to a single storey at the eastern end, a quite natural transition given the western end of the site sits on a corner in a much wider part of the plot before it considerably narrows to the east. It is not considered that the building will be out of scale with the wider or immediate character of the area and provided that appropriate materials are used, which can be controlled by condition, then your Officers consider that the proposal will enhance the visual character of the area.

The remaining issue is therefore the impact of the development upon the amenities of surrounding properties. Having assessed the application, it is considered that the main issue in the determination of the application, having considered the points above, is the impact of the proposal upon 2 Ravens Road which is the property located immediately to the north.

Number 2 Ravens Road is part of a pair of dwellings on the eastern side of Ravens Road and was originally a 2 storey property which has extended into the roofspace including the incorporation of a large dormer which sits on its southern roofslope so facing the application site. There is also a single storey extension on the southern side of the property, which was built in 2016 and has fooflights in its sloping roof which partly serve an open plan dining room. There is also a conservatory to the rear which was granted permission in 2005.

At present, the existing Cecil Norris House has little impact upon number 2 primarily because of its flat roofed nature although in terms of outlook the existing building cannot be described as attractive with the top of the flat roofs clearly visible from the dormer window. The comparatively low level nature of the existing building means that it does impinge on the outlook from the dormer window at all which therefore allows a view to the south where, for example, St Mary's Church can be seen. Similarly, when viewed from the eastern facing patio doors (also part of the 2016 extension), the existing building has little impact as it drops to single storey towards the eastern extent of the site. The aforementioned conservatory has windows in its eastern and southern sides and again the existing building has little impact when viewed through the eastern windows, but is clearly visible from the southern windows.

It is clear, therefore, that the proposal will have impact upon this property and the extent of that impact has to be assessed carefully. As mentioned earlier, number 2 is higher than Cecil Norris House and there is a clear functional reason for replacing the building in terms of providing affordable housing and a clear potential for visual improvement given that the building does not reflect the character of the surrounding area. It would be unrealistic, therefore, to expect that the replacement of the building will not result in an increase in either height or scale, particularly when assessed against the government requirement to provide new homes in sustainable locations while making the most efficient use of land.

The representation from the neighbour and indeed a number of others who have made similar points, firstly quote quite extensively from Local Plan policy and the Council's Supplementary Design Guidance regarding Space Around New Developments and Flats. It is contended by the objector's that the application fails against the Council's own policies.

In terms of the Adur Local Plan, it should be remembered at the outset that the introduction to the Plan identifies a number of key issues. These include at number 4:

The need to meet identified housing needs - Adur needs to address a range of housing requirements including the projected increase in smaller households, more family housing and affordable housing.

The scheme, as mentioned above, would clearly meet this objective although the footnote to key issue 3 does impress the need to:

…strike a balance between facilitating development, achieving regeneration and delivering infrastructure, whilst maintaining built and natural environmental quality, 'sense of place' and the character of Adur.

This means that there is a balance to be struck as anticipated at paragraph 2.6 which is the section that deals with the Spatial Strategy of the Plan:

Given the limited amount of land available, it is important that developments make efficient use of land by developing at appropriate densities whilst respecting the character of the area (although higher densities may be appropriate in town centre locations…)

Policy 22 deals with density specifically and states:

New residential developments should achieve densities of a minimum of 35 dwellings per hectare. Development in the defined town/village centres…will be expected to achieve higher densities…

A consideration of density having regard to the above policy is of limited value given that at 13 units, the existing density of the site already considerably exceeds the above policy requirement (the site measurement on the application form is given as 1138 square metres which is the equivalent to 0.11 hectares). Using the given measurements, the existing site density is around 91 to the hectare and an increase of an additional 2 units would increase this to around 130 per hectare. A refusal of the application against policy 22 would therefore be difficult to resist given the existing quantum of development on the site. Indeed, in the Council's Supplementary Planning Guidance it is stated '*The use of density as a criteria for controlling developments is considered to be very crude and will not in itself ensure a good quality of residential environment. It is considered that generally the specific requirements of a site will usually determine the acceptable density'.*

The SPD does, though, go on to give guidance pertinent to the consideration of the application and policy 22 does require new development to comply with the criteria set down within it. This includes:

Residential developments, in order to prevent over-developed layouts, should not have an excessive overall site coverage of buildings

While the above point has been raised in objection, your Officers feel that site coverage per se would not be a justifiable reason to resist the development given that the existing building already covers a fair proportion of the site and because of its angle to the road when viewed from the east in particular, the existing siting is not considered to be that best ensures an attractive frontage to the south of the site. The new scheme would provide an opportunity to improve this frontage and added to the ability to impose a landscaping condition to soften the frontage, as well as the western part of the site still further, means that in visual terms an improvement is likely to result.

Privacy distances have also been cited in some of the representations but those standards deal with facing windows and there are no direct face to face windows

contained within the proposal. Of the windows which do face north, therefore across the gardens of residential properties the scheme proposes truncated windows to the rear elevation which has the effect of directing views away from facing windows while those with an internal cill lower than 1700mm on the north elevation are obscured which is considered acceptable.

The guidance also requires that buildings are generally set back 1 metre from the boundary, although on a corner plot and in the case of flats, a gap of at least 2 metres is required. Clearly, the latter applies in this instance and, as stated in the supporting information, a gap of at least 2 metres to the boundary is provided which would represent an improvement compared to the existing gap to the boundary, albeit that the closest elements at present are single storey

The remaining part of the guidance which is relevant states:

In infill and redevelopment schemes new buildings should…ensure the retention of adequate privacy for and daylight to existing dwellings/flats.

A Daylight Report was submitted with the application which states:

The daylight, sunlight and overshadowing study to evaluate any impact of the proposed Cecil Norris House development on the neighbouring dwellings has been undertaken.

The study has demonstrated that the development will not noticeably impact any of the neighbouring windows facing the development. The overshadowing study has shown there will be a minor increase in overshadowing during late afternoon to 2 Ravens Road but that the garden shall still achieve direct sunlight to more than half of the garden for 7 hours a day on 21st March. The other adjacent gardens will not experience any change in overshadowing to their gardens.

As is normal with applications where considerations of daylight, sunlight and overshadowing are of importance, the study was undertaken in accordance with the Building Research Establishment's (BRE) Guide to Site Layout Planning for Daylight and Sunlight (while in the past guidance was provided by the Department of the Environment, this is no longer the case and it is normal for applicants to refer to guidance provided by organisations such as the BRE).

A key method of calculating daylight is Vertical Sky Component (VSC). This refers to a ratio which is the percentage of the total unobstructed view that is available, once obstructions, in the form of buildings are placed in front of the point of view. If one had a totally unobstructed view of the sky, looking in a single direction, then just under 40% of the complete hemisphere would be visible. The guidance goes onto state that if, following a new development, an existing window has VSC greater than 27% it should still receive sufficient light.

The submitted study assessed the VSC not only against 2 Ravens Road but also properties to the east in Queen's Place, namely Aurigny, Nola, Seven Acres and Rinella. The existing VSC in these properties is close to the 40% achieved by an unobstructed view, as may be expected given the low lying nature of the original

building. The assessment found that the VSC would be reduced, quite marginally in the cases of the properties in Queen's Place, the lowest remaining value being 37.45 in the case of Seven Acres, still well above the threshold of 27% outlined above.

As may be expected, the effect upon 2 Ravens Road was greatest, primarily to the first floor side windows which would be reduced from 37.55 to 30.7% in the most extreme instance but still above the 27% threshold. This demonstrates that there would be an impact upon 2 Ravens Road, but not to the extent that would warrant a refusal of planning permission. Indeed, it could be said the seemingly high figure enjoyed at present is because the first floor windows of 2 Ravens Road broadly are level to the existing building while the second floor window, as previously mentioned, looks over the top of the building.

In terms of sunlight, measurements are taken in a similar manner to VSC via the Annual Probable Sunlight Hours (APSH). This states that where there are no obstructions to a window, the annual probable sunlight hours are 1486. A distinction is made between summer and winter and it is considered that if a main living room window can receive 25% of annual probable sunlight hours, including at least 5% in winter then it can be considered as adequately sunlit. A development may also be considered to have a harmful impact if a living room window receives less than 80% of its former sunlit hours. The assessment in this respect stated that as all of the of the affected windows are side or rear windows they are not considered as main living room windows and accordingly there was no reason to make an APSH assessment.

Finally, in terms of overshadowing, it is suggested by the BRE that, for open spaces to appear adequately sunlit throughout the year, *no more than two-fifths and preferably no more than a quarter of any garden or amenity area should be prevented by buildings from receiving any sun at all on 21 March. If, as a result of new development, an existing garden or amenity area does not meet these guidelines, and the area which can receive some sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.*

The assessment concluded that there would be no change to overshadowing in the gardens of the properties in Queen's Place and that currently the garden of 2 Ravens Road receives sunlight for more than half the garden for 8 hours a day. This is stated to reduce by 1 Hour as a result of the development, hence complying with the BRE guidance.

In their objections, the occupiers of 2 Ravens Road sated that the survey was inaccurate as the ground floor south and east elevations had been ignored in the survey and that the results were far more extreme than was anticipated in the submitted survey.

The consultant appointed by the applicant to undertake the study responded:

The BRE guidance requires overshadowing studies to be undertaken of gardens only. The shadows on walls are taken account as part of an annual probable sunlight hours calculation i.e. the number of hours in the year that a window will receive sunlight. The BRE guidance requires this study to be undertaken on living room windows only. The

drawings submitted by 2 Ravens Road for the side extension in 2016 (appended to this letter) confirm the main living room is located at the front of the property facing onto Ravens Road.

The windows on the south and east elevations have not been ignored…as these have been assessed as part of the daylight (VSC) assessment. This is the correct method of assessment for daylight impact on windows. This assessment should assess windows to occupied rooms. On the south elevation the only window serves a utility room, as noted on the proposed plan & elevations drawing for the side extension at 2 Ravens Road, submitted to the local planning authority. Therefore, only the large glazed patio door has been assessed to determine any daylight impact.

A sunlight assessment has not been undertaken on the patio door as this is not a main living room, as indicated on the side extension drawing and confirmed by the photo provided by the planning officer showing a dining area.

The study has not included the conservatory as it is not classed as a habitable room by Building Control. Furthermore, it is fully glazed on the south and east elevations so any change in daylight from the south would not be noticeable. Again, the overshadowing study would not include this area.

A further objection from the occupiers of 2 Ravens Road was received in response to the additional information. This particularly stressed that the area to the rear of the property was used as a living room following the addition of the single storey extension of 2016 which now incorporates a dining room leading through to an open living area.

As a result of the further objection, a further study was submitted by the applicant's consultant which stated:

Due to the concerns of the resident at 2 Ravens Road, further studies have been undertaken to address all of the comments made by Mr McBride in his objection letter dated 16th January 2019. These include:

• Daylight (VSC) analysis of access door with glazed panel to dining area – doors not usually assessed, particularly given the room has a large patio door & 2 rooflights
• Daylight (VSC) analysis of conservatory windows – conservatory is not a habitable room
• Sunlight (APSH) analysis of patio doors to dining area and windows of conservatory – only main living room window is usually assessed.

The further survey did reveal that the southern elevation of the conservatory, currently receiving a VSC of 28.6% would be reduced to 23.4% and hence a breach of the BRE guidelines in terms of the 27% limit, albeit the other measurement requiring the revised VSC to be at least 80% of the previous VSC would still be met. However, the 3 eastern windows serving the conservatory would remain between 35.7 and 37.1% in compliance with the guidelines.

The further assessment also considered the concerns regarding the impact on the rooms used as main living rooms which would receive light from the dining room and conservatory area and APSH study was undertaken. This concluded that the relevant windows would receive between 31 and 50% of the sunlight hours in summer and between 6 and 18% in winter which would meet the BRE guidance of between 25% and 5% for summer and winter respectively.

In terms of technical guidance, therefore, your Officers are satisfied that the submitted studies demonstrate that the relevant tests are met. This is not to state that the development will not have some impact upon the neighbouring property and as such an assessment against BRE guidance is not mandatory, i.e. it is not an instrument of planning policy as such, and hence it is up to the planning authority concerned as to how flexibly or otherwise they assess this guidance.

Paragraph 123 of the NPPF does provide some further guidance as it states:

In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site

The above could be interpreted as suggesting, therefore, that a more rigid interpretation of the daylight and sunlight standards, especially where technical guidance is met, should not be used as a mechanism to reduce the scale of the proposal. Given the opportunity to provide a 100% affordable housing scheme, which is an acknowledged strategic aim of the Council, therefore, your officers can only conclude that having regard to national and local planning policies, there are no reasons to resist the proposal and accordingly it is recommended that planning permission is granted.

Recommendation

To GRANT planning permission

Subject to Conditions:-

01 Approved Plans
02 Full Permission
03 No part of the development shall be first occupied until the car parking spaces have been constructed in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority. These spaces shall thereafter be retained at all times for their designated use.
Reason: To provide car-parking space for the use.
04 No dwelling shall be first occupied until covered and secure cycle parking spaces serving the respective dwellings have been provided in accordance with plans and details to be submitted to and approved by the Local Planning Authority.
Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies.
05 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. Thereafter the approved Plan shall be

implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

• 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.

06 No part of the development shall be first occupied until pedestrian visibility splays have been provided either side of the proposed car parking spaces in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority. These visibility splays shall thereafter be kept free of all obstructions over a height of 0.6 metre above adjoining carriageway level or as otherwise agreed.

Reason: In the interests of road safety.

07 Drainage details as per e-mail dated 24 January from Andrew Keen, HOP Consulting Civil and Structural Engineers

08 The development hereby permitted shall provide 100% affordable housing in accordance with the approved scheme and shall meet the definition of affordable housing in the National Planning Policy Framework or any future guidance that replaces it.

09 Approval of Materials

10 Landscaping

11 No additional windows, northern elevation

12 Windows with an internal cill lower than 1700mm on the north elevation are obscured

13 Maintenance regime for green wall and sedum roof to be agreed

14 Hours of Construction

11th February 2019