

FAO: Marie O'Keeffe

15th June 2026

Dear Ms O'Keeffe

Representation on behalf of the residents of 20 Cecil Road in objection to AWDM/0388/26 Planning application for a two storey side extension, single storey rear extension and rear dormer at 22 Cecil Road, Lancing, BN15 8HN.

I write in my capacity as Director of **LF Architecture Ltd** on behalf of my clients, the residents of **20 Cecil Road**, who are the adjoining occupiers directly affected by the proposed development at **22 Cecil Road**.

My clients object to the application in its current layout. The proposed single-storey rear extension would cause unacceptable harm to the residential amenity of No. 20 through loss of daylight, reduced outlook and an increased sense of enclosure. There are also secondary concerns regarding loss of off-street parking provision, potential overlooking from the proposed first-floor side elevation windows and inconsistencies within the submitted application drawings.

1. Accuracy of application description and submitted drawings

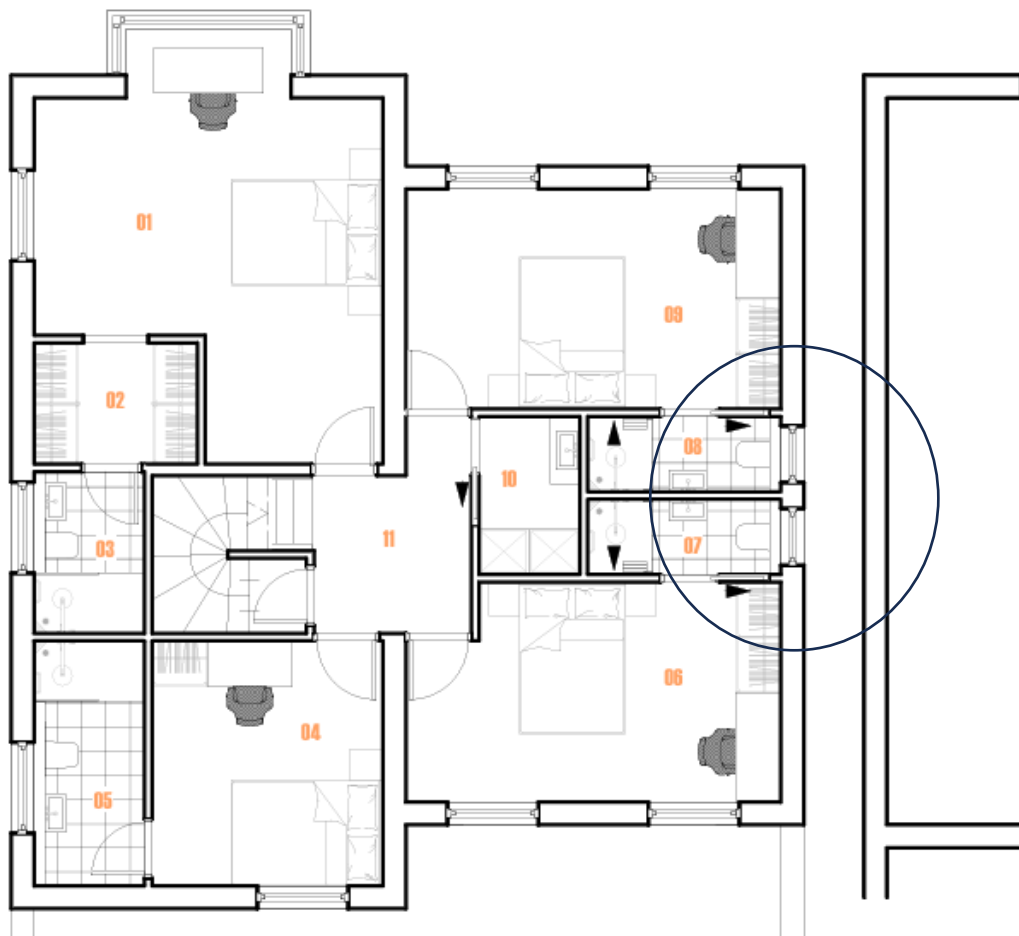
Before the planning impacts can be properly assessed, the submitted information should be corrected and clarified.

The application description refers to a two-storey side extension, single-storey rear extension and rear dormer. However, the submitted drawings appear to show an increase in the eaves / roof height to accommodate proposed rooms within the roof space. That increase in roof form and height is a material part of the proposal and should be clearly described and assessed as part of the application.

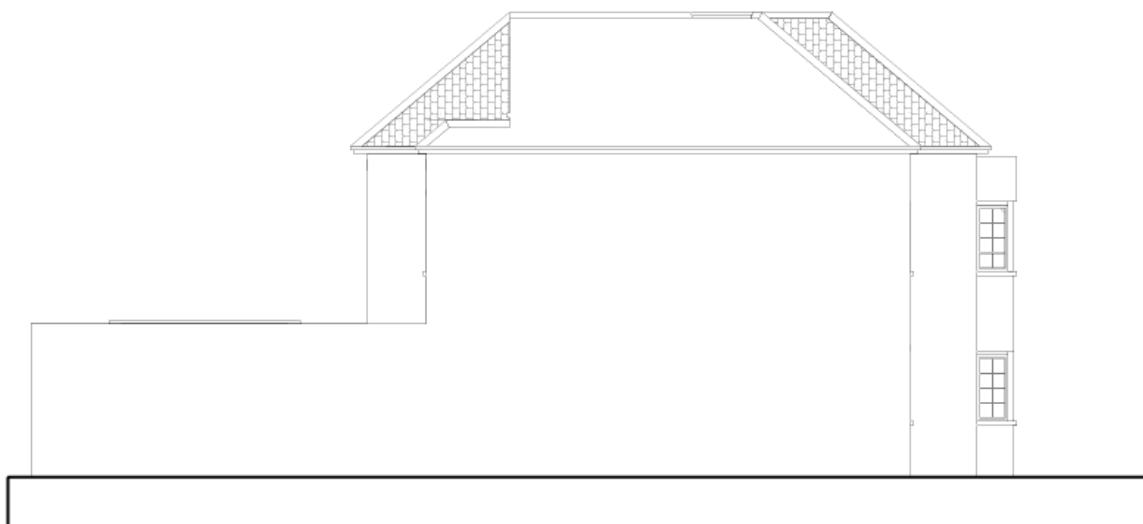
There is also an inconsistency between the submitted drawings. Drawing 05 appears to show proposed first-floor bathroom windows on the north elevation facing towards No. 20. However, those windows appear to be omitted from the proposed north elevation on Drawing 11. This is a material inconsistency because the north elevation directly affects my clients' property and is relevant to privacy, overlooking and the proper assessment of the side elevation.

The Council should not determine the application on inconsistent drawings. The applicant should be required to submit corrected drawings showing the proposed north elevation accurately, including all proposed first-floor windows and any changes to eaves, wall or roof height.

Extract from drawing 05 – First Floor AS Proposed showing 2no. first floor bathroom windows in the North Elevation



Extract from drawing 11 – North Elevation AS Proposed omitting the 2no. first floor bathroom windows shown on the plan above



NORTH FACING ELEVATION AS PROPOSED

2. Impact on daylight, outlook and residential amenity

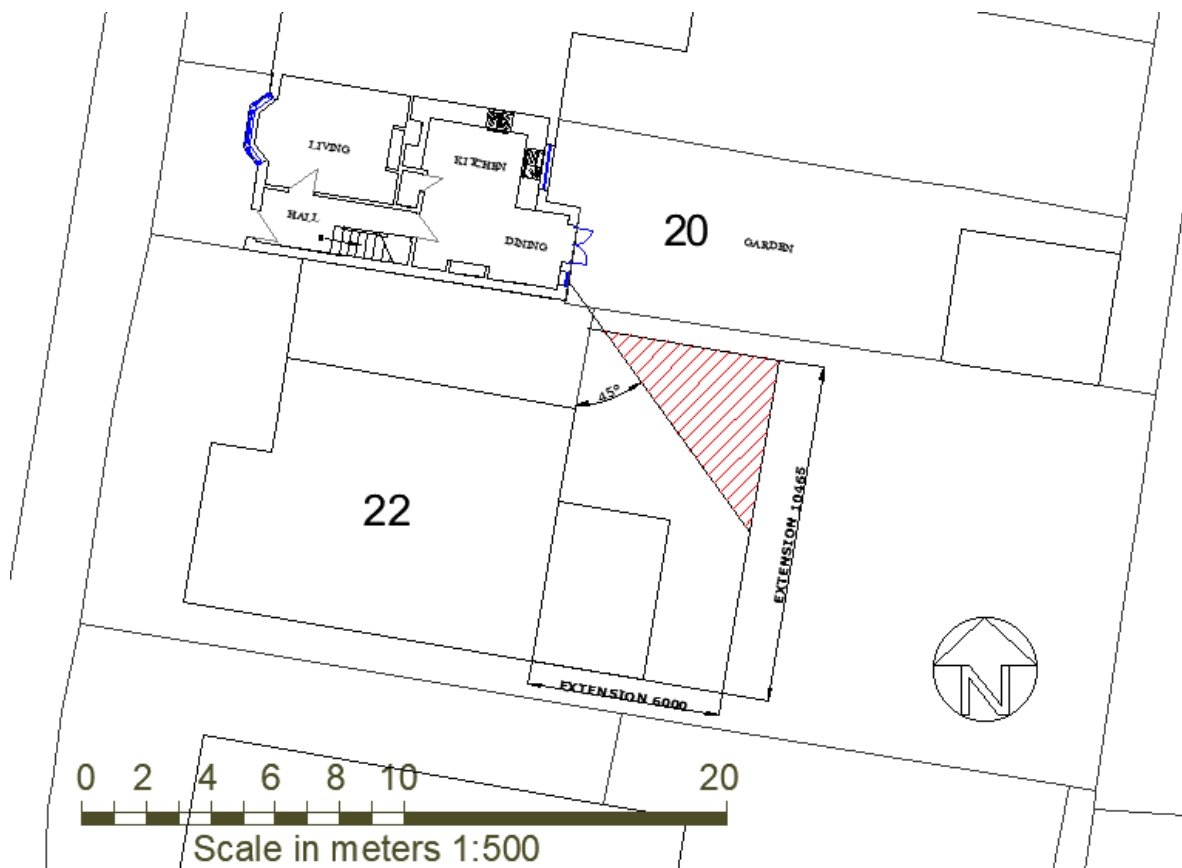
The affected rear window and French doors at No. 20 serve a dining room. This is a habitable room and should be given proper weight in the assessment of neighbouring amenity.



Having reviewed the submitted drawings and the relationship between the properties, the proposed single-storey rear extension appears to project beyond the 45-degree daylight / outlook line when assessed from the dining room window at No. 20. The extent of the projection is material. It is not a minor technical issue. It indicates likely harm to the amenity of No. 20 through loss of daylight, reduced outlook and increased enclosure.

The orientation of the properties increases the concern. The proposed rear extension would be positioned directly to the south of No. 20. As a result, the projection beyond the 45-degree line is likely to have a greater impact on daylight and sunlight to the dining room window and French doors than would be the case if the extension were located on a less sensitive orientation. This reinforces the need for the Council to treat the impact on No. 20 as material planning harm.

The area of the proposed extension shown hatched in red on the OS plan below indicates the extent of the proposal that would project beyond the 45-degree daylight / outlook line when assessed from the dining room window at No. 20 Cecil Road. This supports my clients' objection that the proposal would cause unacceptable harm to their residential amenity through loss of daylight, reduced outlook and increased enclosure.



The separation distance also increases the concern. The proposed side wall of the rear extension running parallel with No. 20 would be approximately 800mm from my clients' property. This creates a very tight relationship between the proposed built form and the neighbouring dwelling. In combination with the projection beyond the 45-degree line and the southerly position of the extension, the 800mm separation would materially increase the sense of enclosure and the likely loss of daylight, sunlight and outlook to the dining room window and French doors at No. 20.

Although there does not appear to be a single planning or Building Regulations rule requiring a domestic extension wall to be set more than 800mm from a neighbouring dwelling, the very limited separation is plainly relevant to the planning assessment of neighbour amenity. It also raises practical construction, maintenance and Building Regulations issues which the applicant should address before the application is determined.

Adur & Worthing's local guidance recognises that extensions should not project significantly beyond the rear of adjoining dwellings particularly where close to side boundaries, as this can result in an overbearing impact and loss of light and outlook. The 45-degree line from the nearest rear window of a habitable room in the neighbouring dwelling is used as a rule of thumb for this assessment.

On the submitted information, the proposed rear extension appears to conflict with that amenity test. The applicant has not provided sufficient evidence to demonstrate that the extension would avoid unacceptable harm to the dining room window and French doors at No. 20.

There is also a relevant point concerning the relationship between the dwellings. The property appears to be link-detached rather than detached, with the garages physically connecting the host dwelling to No. 20. It should not therefore be assumed that the property benefits from the

detached-house rear extension allowance for permitted development purposes. In the absence of clear evidence that the dwelling is detached for the purposes of the GPDO, the Council should proceed on the basis that the ordinary single-storey rear extension threshold is the lower threshold applicable to “any other case”.

Although this is a planning application rather than a permitted development application, that point remains relevant to the assessment of the scale and acceptability of the rear projection. The proposed rear extension goes beyond what would ordinarily be acceptable without further scrutiny and it has a direct effect on the habitable dining room window and French doors at No. 20.

The photograph below shows the physical relationship between No. 20 and No. 22 Cecil Road, with the existing garages linking the two properties. There is also a relevant point concerning the relationship between the dwellings. The property appears to be link-detached rather than detached, with the garages physically connecting the host dwelling to No. 20. It should not therefore be assumed that the property benefits from the detached-house rear extension allowance for permitted development purposes. In the absence of clear evidence that the dwelling is detached for the purposes of the GPDO, the Council should proceed on the basis that the ordinary single-storey rear extension threshold is the lower threshold applicable to “any other case”.



3. Parking

There is a secondary concern regarding parking. The submitted proposed drawings appear to show the loss or material reduction of the existing garage parking provision. At the same time, the proposal would substantially increase the size and accommodation of the dwelling. It is therefore reasonable to expect that parking demand associated with the property may increase.

Cecil Road and the surrounding streets are already subject to significant on-street parking pressure. The photographs below show vehicles parked on the pavements on both sides of Cecil Road and close to the junction of Beachcroft Place and Cecil Road. This demonstrates that available kerbside parking is already heavily used and that parking frequently takes place in constrained locations.

This parking pressure is understood to be worse during the summer months due to the proximity of Lancing Beach and the use of Cecil Road and nearby streets by visitors and day trippers. There are currently no residents' parking restrictions in place to manage that additional demand.

Against that context, the loss or reduction of an existing garage parking space at No. 22, combined with the substantial enlargement of the dwelling, is likely to increase reliance on already constrained on-street parking. The applicant should therefore be required to confirm the existing and proposed parking provision and demonstrate that the development would not worsen parking stress in Cecil Road or the surrounding streets.





4. First-floor side elevation bathroom windows

There is also a concern regarding the proposed first-floor bathroom windows shown on the north elevation facing towards No. 20.

Although these windows are understood to serve bathrooms, they are upper-floor side elevation windows facing towards the neighbouring property. To protect the privacy of No. 20, the drawings should clearly confirm that these windows will be obscure glazed and either fixed shut or only openable above 1.7m above internal finished floor level.

This approach reflects the standard privacy control applied to upper-floor side elevation windows, including the GPDO Class A condition that such windows must be obscure glazed and non-opening unless the opening parts are more than 1.7m above the floor of the room. Obscure glazing should be to a minimum privacy level 3 and should be permanently retained.

The inconsistency between Drawing 05 and Drawing 11 makes this issue more significant. If the windows are proposed, they must be shown accurately on the north elevation and controlled by condition. If they are not proposed, the first-floor plan should be corrected.

If the Council is minded to grant permission, my clients request that a condition is imposed requiring any proposed first-floor bathroom windows in the north elevation to be obscure glazed to a minimum privacy level 3 and either fixed shut or restricted so that no opening part is below 1.7m

above internal finished floor level. The condition should require those privacy measures to be retained permanently.

5. Party Wall etc. Act 1996

For completeness, my clients also reserve their position under the Party Wall etc. Act 1996.

Given the proximity of the proposed works to the boundary and to No. 20, it appears likely that party wall notices will be required before works commence. This may include works adjacent to the boundary and any excavation within the relevant distances of my clients' property and foundations.

I appreciate that Party Wall Act matters are separate from the planning process and are not relied upon as a planning ground of objection. However, if the Council is minded to grant permission, my clients request that an informative is added to any decision notice reminding the applicant that planning permission does not remove the need to comply with the Party Wall etc. Act 1996 where applicable.

6. Conclusion

My clients request that the Council refuses the application in its current layout.

In the alternative, the proposal should be amended so that the single-storey rear extension does not project beyond the 45-degree daylight / outlook line from the dining room window at No. 20 and adequate parking provision is retained or properly justified.

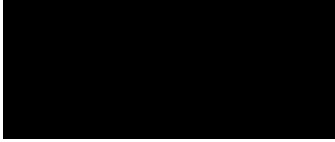
Before the application is determined, the applicant should also be required to correct the submitted drawings and clarify the full extent of the proposed works, including the increased eaves / roof height and the proposed first-floor north elevation windows.

If the Council is minded to support the application, my clients request that the applicant is first required to provide:

1. a daylight / sunlight assessment addressing the impact on the dining room window at No. 20
2. corrected drawings accurately showing all proposed elevations, including the north elevation and any proposed first-floor bathroom windows
3. clarification of the increase in eaves / roof height required to accommodate the proposed rooms within the roof space
4. clarification of the planning status of the dwelling given the physical garage link between the properties
5. confirmation of the existing and proposed parking provision following the loss or alteration of the garage space
6. confirmation that any proposed first-floor bathroom windows in the north elevation will be obscure glazed to minimum privacy level 3 and either fixed shut or restricted so that no opening part is below 1.7m above internal finished floor level
7. confirmation that the applicant has been advised of their obligations under the Party Wall etc. Act 1996
8. confirmation of the separation distance between the proposed rear extension wall and No. 20, together with details explaining how the proposal addresses construction access, future maintenance and Building Regulations requirements arising from the close relationship between the buildings

Until that information is provided, the application does not demonstrate that the proposed development would avoid unacceptable harm to the amenity of No. 20 or avoid worsening existing parking pressure in the area.

Yours sincerely



Louise Flower
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Director
LF Architecture Ltd