

**COUNTER-REPRESENTATION IN RESPONSE TO APPLICANT'S  
ADDITIONAL REPRESENTATIONS**  
**AWDM/0696/26 | 66 Buckingham Road, Shoreham-by-Sea**

---

64 Buckingham Road  
Shoreham-by-Sea  
West Sussex  
BN43 5UD

15 August 2026

Development Management  
Adur District Council  
Civic Centre  
Ham Road  
Shoreham-by-Sea  
BN43 6PR

Dear Sir/Madam,

**Planning Application Reference: AWDM/0696/26 | Planning Portal Reference: PP-14965613**  
**Location: 66 Buckingham Road, Shoreham-by-Sea, West Sussex, BN43 5UD**

We write as the owners and occupiers of 64 Buckingham Road in response to the additional representations submitted on behalf of the applicants by DA Design on 11 August 2026. We wish to place the following observations on the planning file for the case officer's consideration.

**1. Upper Shoreham Road Is Not a Comparable Context to Buckingham Road**

The agent's additional representations draw attention to five decisions at properties on Upper Shoreham Road, which is an arterial through-road with a materially different character to Buckingham Road. It contains a more varied building stock, including a significant number of former bungalows and chalet properties that have been incrementally raised and extended over time.

Buckingham Road is a quieter residential road characterised by substantial detached and semi-detached dwellings of predominantly interwar origin, set on generous plots. The character of the two streets is different in kind, and we invite the case officer to consider whether decisions taken in respect of properties on Upper Shoreham Road are straightforwardly transferable to the assessment of proposals on Buckingham Road.

**2. The Cited Dormer Precedent Does Not Match What Is Proposed**

The agent cites AWDM/1450/23 at 265 Upper Shoreham Road — a large rear flat roof dormer to facilitate a loft conversion — as precedent for the acceptability of the rear dormer proposed at 66 Buckingham Road. We submit that this comparison is not apt. A loft conversion dormer serves an existing roof space. The roof of the dwelling already exists; the dormer adds light and headroom to space that is already enclosed. This is a conventional and well-established form of development that DMS2 Section 3.11 addresses directly.

The proposal at 66 Buckingham Road is materially different. The existing roof space is not being converted — it's being very significantly extended at second floor level to create a new and substantially larger roof form to incorporate purpose-built habitable accommodation. The dormer does not serve an existing roof space; it serves new space that would not exist but for the construction of the extended roof. This is a categorically different proposition to a loft conversion, and we contend that the precedent cited does not apply.

DMS2 Section 3.14 states that ‘the cumulative effect of a combined roof extension and dormers is unlikely to be acceptable since the resulting works would probably be out of scale and proportion with the original dwelling.’ The agent has not addressed this provision in their additional representations, and we believe it continues to apply directly to the revised scheme, weighing materially against approval.

### **3. The Buckingham Road Precedents Require Verification**

The agent refers to decisions at 54 and 69 Buckingham Road as establishing relevant precedent on the same road. These references are made without providing copies of the relevant decision notices or officer reports, and we are not in a position to verify the accuracy of the agent’s characterisation of those decisions from the information provided.

We invite the case officer to review the decision notices and officer reports for those applications to satisfy themselves that the scale, massing and boundary relationships involved are genuinely comparable to those proposed at number 66.

In particular, we would ask whether either of those decisions involved the construction of an extended roof form at second floor level — as opposed to more conventional extension or loft conversion works — before treating them as determinative precedent in this case.

### **4. The ‘Incremental Development’ Argument Does Not Assist the Applicants**

The agent argues that many properties on Buckingham Road and Upper Shoreham Road have reached their current scale through incremental extensions approved over time, and that the proposed scheme — achieving equivalent scale in a single coherent exercise — is therefore no more objectionable in principle.

We submit that this argument, taken to its logical conclusion, would effectively remove any meaningful policy constraint on the scale of extensions, provided they were well-designed. DMS2 exists precisely to ensure that extensions are proportionate to the original dwelling and the character of the area. The fact that some properties have grown large through incremental additions — each assessed individually against the policy at the time — does not mean that a single application seeking to achieve a similar outcome should be assessed as though the policy constraints do not apply.

DMS2 Section 3.1 itself notes that ‘the cumulative effect of subsequent additions may lack cohesion and be out of scale with the original dwelling and are therefore unlikely to be considered favourably.’ The agent’s argument that a comprehensive remodel should be judged more favourably than incremental additions is not supported by DMS2, which treats the cumulative scale of additions as a reason for caution, not a reason for greater permissiveness.

### **5. Conclusion**

It’s our view that the additional representations submitted by the agent do not undermine the grounds of objection we have set out in our previous representations. We maintain that objection accordingly and remain available to discuss these matters with the case officer at any time.

Yours faithfully,

Mr G and Mrs P Anderson  
The Owners and Occupiers  
64 Buckingham Road, Shoreham-by-Sea