APPEAL BY:
Mr Simon Twiddy

AGAINST ADUR DISTRICT COUNCIL'S REFUSAL TO GRANT PLANNING PERMISSION FOR:

Renovation of existing jetty and change of use from mooring of leisure craft boats to mooring of up to five residential houseboats

AT
Jetty opposite 31 and 33 Riverside Road, Shoreham-by-Sea, West Sussex

Adur District Council Reference: **AWDM/1195/24**

PINS Reference: **6006139**

WRITTEN REPRESENTATIONS: RESPONSE TO LPA STATEMENT AND THE THIRD PARTY REPRESENTATION RECEIVED

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RJS PLANNING
T: 0208 3543582 M: 07884 138682 E: info@rjsplanning.co.uk
RJS Planning. 15 Vale Court, Ealing Road, Brentford, TW8 0LN

1.0 INTRODUCTION

1.1 This statement has been prepared by RJS Planning, on behalf of Mr Simon Twiddy in response to the statement from the Local Planning Authority and the third-party representation received.

2.0 RESPONSE TO LPA STATEMENT

2.1 The Council has chosen to rely on the delegated officer report, but the brief comments provided do not alter the assessment set out in the appellant's Statement.

2.2 The Council's suggestion that the proposed houseboats would be more prominent because they sit at the end of a jetty does not change the fundamental point that this is an established mooring structure long used for leisure craft. The proposed vessels are low profile, modest in scale and comparable in form to existing houseboats along the River Adur. Their height of 2.3m ensures they sit well below surrounding rooflines and remain visually contained within the river corridor where other comparable houseboats exist.

2.3 With regard to activity, the Council's concerns about short term letting are speculative and were not part of the original reasons for refusal. The appellant confirms that the houseboats are intended for permanent residential occupation, not holiday use. If the Inspector considers it necessary, a condition restricting short term letting can be imposed.

2.4 Additionally, the Highway Authority has already confirmed that the proposal is not expected to result in a significant intensification of the access and raises no concerns regarding safety, parking or turning.

2.5 The Council's comments on the Flood Risk Assessment simply repeat the Environment Agency's request for tether/mooring pole levels to be added. The appellant has already confirmed that this can be secured by condition, and this matter does not weigh against the proposal.

2.6 Overall, the Council's response does not provide any substantive evidence to support its reasons for refusal. The points raised are either already addressed in the appellant's case or are capable of being controlled by condition. The proposal remains consistent with the NPPF and the relevant policies of the Adur Local Plan.

3.0 SUGGESTED CONDITIONS

3.1 The appellant will accept any conditions deemed necessary and appropriate to the circumstances of the case.

4.0 THIRD PARTY REPRESENTATIONS

4.1 The appellant acknowledges the third party representations but considers that these are based on a misunderstanding of the proposal.

4.2 The appeal site is an established mooring location, the proposed vessels are low-profile and comparable to existing houseboats along the River Adur, and the scheme includes the clearance of stored materials and repair of the jetty, which will improve the appearance of the site compared with its current condition. Therefore, comments suggesting that the proposal would detract from the appearance of the river are unwarranted.

4.3 Concerns about traffic, parking and increased activity similarly are fully addressed in the appellant's Statement and notably, no objections were raised by the Highway Authority, which confirms that the proposal is not expected to result in a significant intensification of the access, that the access has operated safely for at least five years, and that the parking and turning arrangements are acceptable.

4.4 The appellant asserts that no technical evidence has been submitted by third parties to challenge the professional assessment of the Highway Authority and as the residential occupation of five houseboats would generate predictable, low level activity it is likely to be less intensive than the irregular movements associated with leisure boating.

4.5 A number of other comments fall outside the scope of the appeal or are not material planning considerations. Assertions about the general maintenance of other houseboats, private views, expectations that land behind dwellings would never be developed, the historic purpose of the jetty, or generalised concerns about tourism, village wide traffic or construction elsewhere do not relate to the specific reasons for refusal and carry no weight. Matters such as sewage and drainage are already addressed through the submitted technical information and can be secured by condition.

4.6 None of the third party comments introduce new evidence or raise issues that would alter the planning balance. The appellant's case remains that the proposal would not harm the character or appearance of the riverside, would not result in unacceptable

impacts on neighbouring amenity, and accords with the relevant policies of the development plan and the NPPF.

5.0 CONCLUSION

5.1 In summary, the appellant asserts that the Council's reasons for refusal are unsound as the appeal scheme accords with the aims of the National Planning Policy Framework and with relevant Local Plan policies, including Policies 11, 15 and 34.