

# SUPPORTING PLANNING STATEMENT

Extend building upwards by one additional storey to create 5  
additional 1 bedroom flats

at

‘Victoria Gate’, 119-127 South Road, Haywards Heath,  
West Sussex



MAY 2025

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## **1.0 Introduction**

- 1.1 This application seeks full planning permission for an additional storey to be added to the building to accommodate an additional 5 no. 1 bedroom apartments. This is in the form of mansard style extensions to the main part of the building, and the existing side / ‘link’ element on the south-eastern side of the building, which is one storey lower.
- 1.2 KLW Ltd has been appointed by the applicant to review the proposals and to prepare a Planning Statement. This Statement is to be submitted in support of the application by the architect, William Deakins.
- 1.3 KLW Ltd is a well-established Chartered Town Planning Consultancy, based just outside Tunbridge Wells and is therefore very experienced in dealing with all types of development proposals across the South- East, and beyond.

## **2.0 Site and Surroundings**

- 2.1 The site lies in a sustainable location within Haywards Heath town centre, and a short walk from a variety of shops and services. Additionally, the premises is located within 1km of Haywards Heath railway station, with direct services to Gatwick Airport, London Victoria, Brighton, Lewes, Eastbourne and other intermediate destinations.
- 2.2 The application premises are located on the south-western side of South Road, and comprise a part 2 storey, part 3 storey building, with retail units at ground floor, and former Class B1(a) offices converted to apartments, at first and second



floor level. The premises comprise a flat roofed building dating from the second half of the 20<sup>th</sup> Century and constructed from brickwork.



*Above: A view of the frontage of the premises seen in context with the older adjoining properties to the south east (application premises are on the right hand side of image).*

- 2.3 The premises are accessed by vehicles via a service road to the rear, which leads from Haywards Road to a small private parking area used by the existing properties within the site. There is a public car park (West Car Park) accessed off Haywards Road.
- 2.4 Adjoining the site, to the side and rear, is Victoria Park which is a large recreational area which provides open space, children's play areas, a skate park as well as football pitches and tennis courts.

- 2.5 The site is unconstrained by any flood risk or heritage designations and there are no trees or ecology features or habitats.

### **3.0 Application proposal (including Design and Access Considerations)**

#### *Use*

- 3.1 It is proposed to add additional residential units above the existing uses within the site, by adding a roof extension.

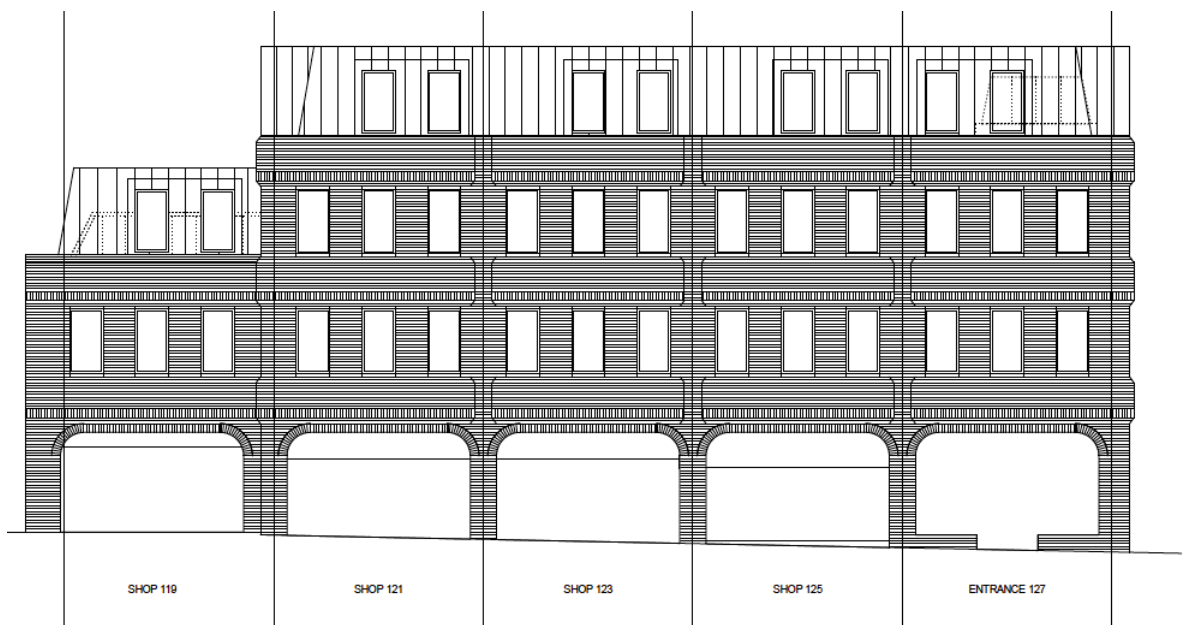
#### *Amount*

- 3.2 The proposal is for a total of 5 apartments. The apartments are all 1 bedroom units, with open plan living / kitchen / dining areas and with separate bedroom and bathroom.
- 3.3 4 of the apartments would be provided at third floor level, with one apartment located above the lower, currently two storey, link element that adjoins the older properties in South Road. The total additional floorspace proposed is 308m<sup>2</sup>.
- 3.4 The floor space and arrangement of each apartment is set out on the submitted architectural drawings.



### *Appearance and scale*

- 3.5 The overall height of the proposed extension would be 3.17m, however this is only 2.4m above the existing brick parapet, which the proposed roof structure would be set behind. The proposed extension would be constructed from zinc profiled cladding with a ‘sarnafil’ membrane to the flat roofed areas. The mansard roof would have a pitch of about 80 degrees.



**Above** – front elevation showing proposed roof extension

### *Access*

- 3.6 Access to the retail units and existing flats would be unaffected. Access to the proposed flats would be achieved, in the case of the second floor unit proposed, via a doorway from the existing corridor, and in the case of the third floor level flats, by extending the existing front and rear stairwells upwards by one storey.

- 3.7 Cycle storage options are being looked at and could be secured by condition.

*Landscaping*

- 3.8 There would be no change to the external areas. No landscaping is proposed.

*Flood Risk*

- 3.9 The site is not within a Flood Risk Area, it is within Zone 1 on the Environment Agency Mapping. The proposal is therefore in accordance with the aim set out within the NPPF to steer new development to areas with the lowest probability of flooding. The proposal is at roof level and does not enlarge the footprint of the existing building. There is therefore considered to be no significant or unacceptable degree of flood risk.

## **4.0 Relevant Planning History**

- 4.1 The following development control application may be of relevance. There are other applications for minor alterations – such as security gates and shutters but these are not relevant to the current proposals.

- 4.2 13/2794/PDOFF – Prior notification for change of use from office building to 10 residential units. Approved 7<sup>th</sup> October 2013.

**Pre-application Engagement**

- 4.3 A pre-application enquiry was undertaken by the project architect. In a written response dated 11th February 2022 and following consultation with the Council’s Urban Designer, the case officer responded positively to a single-storey addition, provided that the design was set-back behind the existing parapet.





## **5.0 Relevant Planning Policy**

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan, unless material considerations dictate otherwise. For the purposes of this application, the Development Plan comprises:

- Mid Sussex District Plan 2014-31
- Haywards Heath Neighbourhood Plan 2014-31

Additionally, there are a number of adopted Supplementary Planning Documents including:

- Mid Sussex Design Guide 2020
- Haywards Heath Town Centre Masterplan SPD 2021

5.2 The Council in July 2024 submitted The District Plan Review for examination, since then the most recent update on 28<sup>th</sup> March 2025 is that the Council is waiting to hear from the Inspector regarding the completion of action points set by the Inspector during stage 1 hearings. Due to the current stage of the review and its examination, limited weight to this plan will be given during the planning policy analysis of this report.

5.3 The most recent five-year housing supply figures have been calculated at various points in time; Draft Submission stage, Main Modification stage and pre submission stage of the District Plan Review. The 5-YHLS pre-submission of the plan review was 5.04 years (1<sup>st</sup> April 2023), following this, the draft submission position was 5.3 years with the Main Modifications version of the plan being 5.56 years.





- 5.4        Regardless of weight given to draft plans under examination, the Council have recently demonstrated a five-year housing land supply. Although is the case, this should be seen as a minimum requirement. There is no upper limit to the supply in which the Council may attain, and it is a key objective of the Government to boost the delivery of housing.
- 5.5        Regard should be had to other material considerations including the National Planning Policy Framework (updated December 2024). Furthermore, West Sussex Parking Guidance 2020 is of some relevance although must be balanced with considerations with the NPPF and Development Plan.

National Policies

- 5.6        The **National Planning Policy Framework (NPPF)** sets out the overall approach to planning decisions on a national basis. At the heart of the Framework is a presumption in favour of sustainable development. For decision making this means approving proposals which accord with the development plan without delay.
- 5.7        Chapter 5 of the Framework sets out the Government’s objective of significantly boosting the supply of homes. Paragraph 73 recognises that small sites can make an important contribution to meeting the housing requirements of an area and states that planning authorities should support the development of suitable windfall sites within existing settlements – giving great weight to the benefits associated with such proposals.
- 5.8        Chapter 7 of the Framework supports the role that town centres play at the heart of local communities and identifies that residential development often plays an important role in ensuring the vitality of centres (Paragraph 90f).
- 5.9        Chapter 11 of the Framework promotes the effective use of land in meeting the need for homes. Paragraph 125c specifically states that decisions should:



*‘Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.’*

5.10 Further to this, paragraph 125d states the following:

*“Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops)”.*

#### Local Policies

5.11 The following Policies in the Mid-Sussex District Plan 2014-2031 are of relevance:

- DP1 Sustainable economic development
- DP2 Town Centre Development
- DP6 Settlement hierarchy
- DP21: Transport (including car parking)
- DP26: Character and Design
- DP27: Dwelling space standards
- DP30: Dwelling mix

5.12 The following Policies in the Haywards Heath Neighbourhood Plan 2014-31 are of relevance:

Policy B2 – Town Centre Uses (plus supporting para. 7.9)

Policy T1 – Sustainable transport and reduced reliance on private cars

Policy H8 – Infill development



5.13 The relevant planning considerations falling within these Policies will be considered in detail below, however, it is considered that the proposal fully accords with the above Policy considerations as it will:

- promote the best use of previously developed land;
- is in a highly sustainable location within the town centre;
- further encourage mixed uses within the town centre by introducing additional residential accommodation and thereby improving the vitality of the area, including in the evening, and additional support for shops and services;
- will provide smaller units of accommodation suitable for smaller households which is a priority housing need in the District;
- the scale, height and form will sit unobtrusively with the host building and in the streetscene and will add visual interest to the existing building;
- will not adversely impact residential amenity given the limited changes to the massing of the building;
- will not result in the loss of any functional retail floorspace as the ground floor retail units will not be affected;

5.14 Furthermore, as mentioned above, the application will deliver a useful windfall of some five additional residential dwellings, thereby assisting with Government objectives to significantly boost the delivery of new housing. District level housing targets should not be seen as a limit on development but should be seen as a minimum and where possible to deliver additional sustainable housing these opportunities should be taken. This will also help to maintain the required supply – which is still marginal at present. With regard to local housing supply and delivery, it is also not just a question of housing numbers, but there are qualitative issues about delivering the correct housing types and in the most sustainable locations. The proposals will also help with the focus on small sites in the National Framework, where there is an aim to deliver at least 10% of housing via small and medium sized sites.



## **6.0 Planning Considerations**

- 6.1 The relevant considerations are considered to be the principle of, and benefits associated with, the creation of five additional residential apartments; whether the proposal is acceptable in transport terms; the effect of the proposal on the visual amenities of the locality; and the effect of the proposal upon living conditions – both of future occupants and neighbouring residents.

### *Principle of development and associated benefits*

- 6.2 The proposal should be considered in the context of the Government’s stated desire to significantly boost the supply of new housing as recognised by para. 61 of the National Planning Policy Framework (NPPF) and equally, at the local level, to support the acknowledged need for smaller units of accommodation and to encourage residential uses on brownfield sites within Haywards Heath Town Centre (as supported by the Neighbourhood Plan). There is support for mixed uses in the town centre at Local Plan Policy DP2 and supporting text, and the proposals will not affect the ground floor retail frontage as required by that Policy.
- 6.3 Viewed in this context, there is clear Policy support in principle to make the best use of previously developed land, and to provide additional residential accommodation in highly sustainable locations such as this. This scheme will provide a useful windfall of 5 dwelling units – this will provide a fairly modest but nevertheless meaningful contribution towards boosting Housing Supply. It should be noted that the 5 apartments that are proposed will all exceed the minimum national space standards as required by Local Plan Policy and furthermore the provision of good quality 1 bedroom units in this location is supporting by local housing needs evidence as referred to at Local Plan page 81 which states that ‘there will be a significant need for smaller dwelling types over the plan period,



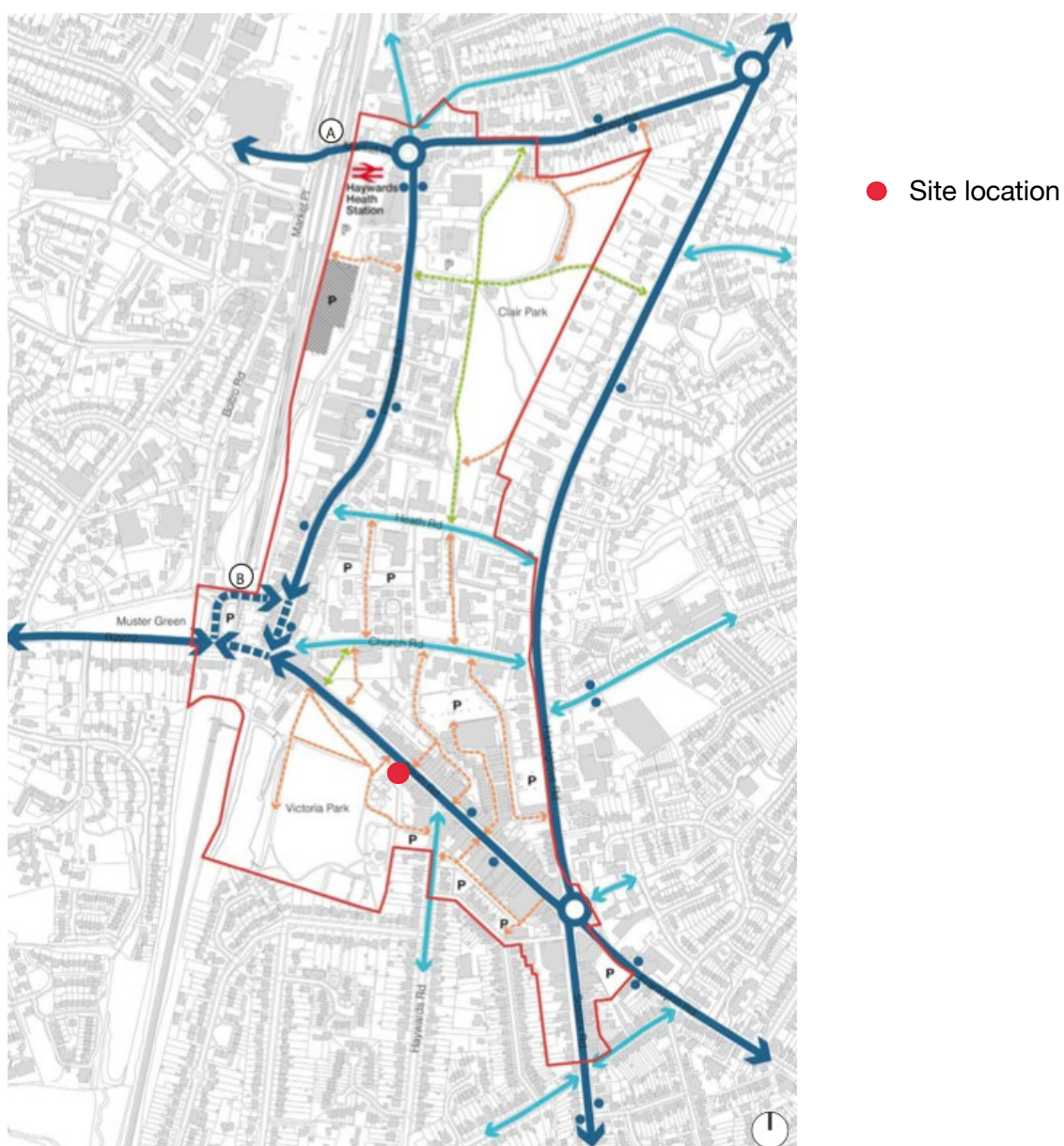
with the majority of new households forming (70%) being one or two person households’.

- 6.4 Alongside this overall benefit, there will also be economic benefits from employment during construction, as well as increased local spending in the local economy following occupation and increased local revenues through CIL / section 106 payments (if applicable), Council Tax receipts, New Homes Bonus, etc.. These benefits would be quite significant even on a modest scale of development. For example a Band A property in Haywards Heath currently pays £1,557.73 per annum – this would equate to some £7,788.65 per annum for the 5 flats proposed. Local financial considerations and economic benefits are relevant material considerations that the Council has a duty to consider, and afford material weight, in assessing the proposal.
- 6.5 The proposal will make efficient use of the building and site, without increasing the built footprint.
- 6.6 It will therefore accord with various parts of the NPPF, for example, prioritisation of brownfield land, development in the most accessible locations, securing the optimum use of sites, encouraging mixed uses and so on. It also falls in line with Local and Neighbourhood Plan policies by ensuring the ground floor frontage and shop units within the town centre retail area is unaffected, and by introducing complementary residential uses which will help to reduce reliance on the private car for commuting and will also help to support the town centre shops and services.
- 6.7 Given the particulars of the case there is considered to be no conflict with National and Local Planning Policy principles, and the proposal therefore attracts strong policy support at all levels.



## Transport

- 6.8 As can be seen from the following extract taken from the Haywards Heath Town Centre SPD, the site is in an exceptionally well-connected location, at the western edge of the primary shopping area and immediately adjacent to Victoria Park. It is also around a 15 minute walk from Haywards Heath train station with its regular services to London, Brighton, Bedford, and other locations along the south-coast.



- 6.9 Furthermore, the site is in close proximity to many public car parks, denoted by a ‘P’ on the above map. Being in the heart of the town centre and noting that 1 bed units are likely to appeal to single persons and couples, the proposed flats are in a location where living car-free is a realistic option.
- 6.10 Policy T3 of the Neighbourhood Plan states that development outside of the town centre should provide parking on site in accordance with standards adopted by MSDC. The implication is that on sites within the town centre, development without car parking (so long as it does not remove existing parking facilities) is acceptable.
- 6.11 In this case, according to the WSCC parking guidance the development would have a parking demand of 4.5 spaces (given the sites location in Parking Zone 4) – applying the 10% reduction as suggested provides a figure of 4.05 spaces. This is a limited parking demand, and it is not possible to provide for this within the site. Given the availability of other transport options (bus and train services) and proximity to all services required for day-to-day living it is considered that the proposals are acceptable on a ‘car free’ basis. This is also taking on board para. 116 of the NPPF which states that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety or if the residual cumulative impacts on the road network would be severe.
- 6.12 Cycle parking for each flat can be provided and made the subject of an appropriate planning condition. The proposals are therefore considered acceptable in transport terms.





*Effect on visual amenities / townscape*

- 6.13 The proposals would improve the appearance of the building by adding a roofscape to what is otherwise a somewhat featureless design form. Whilst the proposals would result in a roofline that is slightly higher than the neighbouring property, this would be acceptable in our view given the property is an ‘end stop’ adjacent to the gap in the streetscene formed by Victoria Park and as the terraced frontage of which the building forms part contains a range of forms, styles and heights.
- 6.14 The addition of one-storey would be a relatively modest change and would maintain the ‘fine grain’ of the area as referred to in the Town Centre Masterplan. The articulation of the additional storey in the form of a mansard, set behind the established parapet would further mitigate the visual impact of the proposal and seamlessly integrate it as part of the host building.
- 6.15 The site is not a Conservation Area but is recognised as a key part of Haywards Heath Town Centre. The extension would be seen from various parts of Victoria Park would views are generally part filtered by established trees.



**Above:** Views from Victoria Park are heavily filtered by established trees, even in Winter.

6.16 The proposals furthermore are in line with the pre-application advice obtained prior to submission.

6.17 Accordingly the proposals are considered to be acceptable in relation to visual amenity and to the relevant policies pertaining to this issue.

Living conditions

6.18 The proposed apartments would offer good quality self-contained, purpose built accommodation.

6.19 In terms of the size of units, the Nationally Described Space Standards were introduced by the Department for Communities and Local Government in 2015 to establish acceptable minimum floor space for new build developments.

6.20 All of the units conform to the space standards and would offer a good standard of amenity including internal lighting and outlook, particularly as they will be on the top floor with views out over the surrounding townscape and neighbouring park.

6.21 Turning to noise impacts, the existing uses in the vicinity of the application building are such that they would not be considered as places of public entertainment or of such commercial uses that generate unacceptable levels of noise. The immediate surroundings of the application site comprise a mix of residential, office, and retail uses including restaurants. However, any impact of these uses upon the existing residents in the vicinity would be no different than the impact upon the amenities of the intended occupiers of the development. Furthermore, the uses within the application building, below the proposed, at first and second



floor level, are already residential. The proposed use is typical of an urban situation where residential and non-residential uses can happily co-exist.

- 6.22 Overall, the proposed scheme is considered to provide future occupants with a good standard of living accommodation in accordance with the relevant local policies.
- 6.23 In terms of impact on neighbouring occupiers, given that the proposals utilise an existing building with modest single storey roof extensions, there would be no material adverse impacts on the amenities of neighbouring occupiers. Neighbouring properties are located to the south-east, therefore there would be no overshadowing caused and the setting back of the proposals 1m behind the parapet on the south-eastern flank of the building would further mitigate any visual impact or effects on outlook.
- 6.24 Refuse storage would be provided in the form of communal bins at ground floor level – final details can be conditioned.



## **7.0 Planning Balance and Conclusion**

- 7.1 The provision of good quality residential accommodation in a highly sustainable location such as this, and optimising the use of previously developed land, attracts significant national and local policy support, and should be afforded very significant weight in the ‘planning balance’. This is especially so in the context of the Government’s stated objective to significantly boost the supply of housing and the fact that these proposals would provide smaller units of accommodation thereby meeting a particular acknowledged housing need within the local Policy evidence base.
- 7.2 The proposals would make productive and efficient use of the existing site without enlarging the built footprint. The proposals would not impinge on the continued operation of the various retail premises at ground floor level but would enhance the established mixed-use situation and add to the vitality of this part of the Town Centre as encouraged with both the Local Plan and Neighbourhood Plan and as supported by the NPPF.
- 7.3 The site is in a highly accessible location, with a broad range of shops, services and transport options available on the doorstep. Accordingly, there are realistic alternatives to the private car available in this location and sound planning and environmental reasons to support car-free development in these circumstances.
- 7.4 The visual and townscape impacts of the proposals have been carefully assessed. Any impacts are minor and with the proposals enhancing the rather featureless appearance of the host building, and the local townscape, which has limited unifying character.



- 7.5 The proposals will provide a high-quality living environment, whilst ensuring no unacceptable impacts on the amenities of neighbouring occupiers.
- 7.6 Accordingly, the proposals strongly accord with the principles set out within the NPPF and those at the local level which direct development to sustainable, previously developed sites such as this. The benefits of the proposals are considered to clearly and significantly outweigh any very limited harm.
- 7.7 The proposals will also provide a modest but nevertheless important contribution towards bolstering housing supply in what is a marginal situation.
- 7.8 The Council is therefore respectfully invited to approve the proposals without delay.

