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Saffron Lodge, 46 Kingsway
Craigweil, Bognor Regis
West Sussex, PO21 4DN

My Ref: AW/201/14/HH-2

29th October 2014

BY EMAIL

The Head of Planning Services
Arun District Council
Arun Civic Centre, Maltravers Road
Littlehampton, West Sussex
BN17 5LF
FAO Head of Planning Services

Dear Sirs
Ref: **FURTHER OBJECTION**: AW/201/14/HH (53 Kingsway) and its amendments

a. Following my previous letter of 15th September, several documents have been 'substituted'. These include assurances from the Applicant/Agent that the Velux windows in the roof area will be for access to light only and occupants will not be able to view the surrounding neighbourhood. I am pleased to hear that as occupants of the properties in the vicinity were most disturbed at that prospect. There is absolutely no detail still however as to the colour of the proposed Velux windows.

b. However, the main thrust of my Objection to these Applications concerns the 'impact' upon the established Craigweil House Conservation Area (CHCA). My previous letter records the various parts of the District Local Plan, namely Policy Area 2, Gen 7 and Gen 22, all of which address what is required within a Conservation Area and an Area of Special Character (CHASC), both of which are relevant to the Application location.

c. I repeat my important remark regarding how this Application must be regarded in the light of 'the future' as well as and as importantly as the present time and occupancy of this property.

d. In the light of that last paragraph, a major concern of residents here, as expressed in their several letters, is the prospect of increasing the number of bedrooms in the property without reference to the possible and likely event of that number of bedrooms leading to excessive demand for parked vehicles to accommodate that number of people within the property.

e. The Agent, within his Design Statement, relates his remarks under 'Access' as 'The proposal maintains existing parking spaces, however there is access to public transportation to local amenities and shops are easily accessible.' This no doubt is inserted to address the part of the District Plan Policy GEN 12, where 'a lower provision than required standard' may be considered. In order to address that provision I would comment as follows:

i. Under '(i) the availability, type and proximity of public parking;'----- *There is no public parking available here, firstly it is a private road without pavements and the Craigweil Private Estate Ltd requirements are that vehicles are not detained in the roadways.*

ii. Under '(ii) the availability of alternative means of transport;'--------*There are some small shops within walking distance of the property but what about getting to schools, college, work and leisure activity. The bus routes are some distance away. With young and old, many activities will require personal car transport, especially youthful members of families of 'driveable age.*

iii. Under '(iii) potential highway safety problems;'----------*Estate roads here are not highways, it is a private road with no pavements, so pedestrians have to be protected from speeding traffic.*

iv. Under '(iv) potential environmental harm arising from parking demand being met elsewhere;'-------- *the visual amenity of the street scene here in Craigweil is of paramount importance and a central plank upon which the CHCA is based. The prospect of increasing numbers of vehicles parked alongside the green verges/kerbs would completely destroy the character and appearance of the CHCA.*

v. Under '(v) The extent and nature of parking restrictions in force on highways in the vicinity;'----------*Mr White our Conservation Officer refers in the last paragraph of his report to the necessity to apply for separate Planning Permissions under Article 4 regulations should further parking be required within the curtilage of the property. That does not address the problem of parking on the roadways. If at some future point, a resident in this property decided to convert the existing garage into an inhabited room, parking within the property could only be for two vehicles at present, hardly enough to serve 8 bedrooms!*

vi. Under '(vi) The scale of development proposed;' ---------I would have thought that with the proposed 7 bedrooms and with the possibility of a converted garage to make 8 in all, the Authority must account for where the likely vehicles serving the property will stand overnight and at weekends. I don't consider that maintaining one of the most salient requirements of CA's generally and in particular the CHCA regarding street parking can possibly be reconciled with these proposals.

vii. And finally Under '(vii) the suitability of "specific use" and "personal" conditions attached to planning applications;'------ *I am not aware of any Condition that could be placed upon a development such as this to restrict the number of vehicles held adjacent to the property. The District's*

own guidelines at Appendix 2 of the District Local Plan – Parking Standards, itself lays down parameters for given property and in this case, those standards appear to have a horse and cart driven through them if this Application is permitted.

1. May I finally return to my main theme. Conversation Areas are created for a purpose. Not just in relation to one Application but to all Applications and not just now but for all time that the CA stands.

2. **PPG 15-Para 4.2 (now superseded by NPPF) Government guidance in England provided that:-**

3. *'It is the quality and interest of areas, rather than individual buildings, which should be the prime consideration in identifying conservation areas. There has been increasing recognition in recent years that our experience of a historic area depends on much more that the quality of individual buildings – on the historic layout of property boundaries and thoroughfares… on vistas along streets and between buildings… and of ensuring that conservation policy addresses the quality of townscapes in its broadest sense as well as the protection in individual buildings.'*

4. **NPPF now at Section 12, Paras 126-141 similarly and** clearly discuss the requirements of development within Conservation Areas and here too, emphasise the need by Planning Authorities to see any development not only as an individual site, but in the context of a Conservation Area as a whole.

5. The Emerging Arun Local Plan 2011-2031 at Para 16.1.11 refers to the PPFF and says:- *'The significance of a heritage asset derives not only from the structure itself, but also from its setting. Setting is defined in the NPPF as being "the surroundings in which a heritage asset is experienced". Careful management within the surroundings of heritage assets is key as it makes an important contribution to the quality of the places".*

6. This Application is important in that it stands to create a new and unacceptable precedent within the Craigweil House Conservation Area. The insertion of a third floor to a domestic, private dwelling does not exist elsewhere in Kingsway. The fact that it will be obvious by the Velux windows to the south, east and west elevations on to Kingsway, changes the 'natural ' and 'characteristic' flow of rooflines along the street-scene, a factor contravening the 'reasons' behind creating the CA in the first place. The insertion of these windows in the Kingsway elevations spoils in my view, the balanced and 'grounded' design of the existing house. In contrast that is, to the other proposed alterations to the garage and front door positions that complement the design. High quality design is a primary requirement for Conservation Areas generally.

For all the reasons outlined above and previous relevant comments, **please REFUSE this Application.**

Yours sincerely

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CC Martyn White, CO. & Councillor Mrs G.Brown, Ward Councillor