

March 2021 BN/150/20/PL Objection Comments

1) Effect on Character and Appearance of Local Area

The proposal will break a continuous run of 17 homes, on the western side of Downview Road, that have at least 45m between the houses on Downview Road (DR) and the next nearest building to the west. This surely establishes the character of the area. In addition, this was the specific primary reason for rejecting the appeal against a refusal of permission for back yard development at No 10 Downview Road. If BN/150/20/PL is approved, placing new homes in close proximity from the rear of No 17 Downview Road, this would in the future be a precedent for backyard proposals, behind those other 17 dwellings.

The proposal refused at 10 Downview Road (EG/108/17/OUT) placed the new dwelling 35m from the rear of the existing 2-storey dwelling, some 58m from the edge of Downview Road. BN/51/20/PL) from the rear of existing dwellings on Downview Road and 40m to 60m from the edge of Downview road. The 3 new 2-storey dwellings (8m tall) would sit behind 3 bungalows, which must adversely affect the Downview Road street scene, especially when viewed from the entrance to Chantry Mead. The roof of the proposed house No 3 will be clearly visible from Downview Road, over the roof of the bungalow at No 17 Downview Road.

The Proposed Development at No 10 Downview Rd EG/108/17/OUT was refused on the following grounds, all of which apply to BN/51/20/PL.

- ✧ Effect of proposal on Character and appearance of area
- ✧ DR established residential area of dwellings of different types and designs in spacious plots set back from road behind front gardens providing off road parking
- ✧ No examples of houses constructed in back gardens
- ✧ Severance of plot plus additional dwelling within back garden incongruous in context of locality and poorly relates to established pattern of development in the area.
- ✧ Requirement to reflect characteristics of site and local area. Conflict with Policies D DM1, D SP1 of local plan and Policy ES6 of B and E NDP (2014). Also, Framework paragraphs 122 and 127
- ✧ Chantry Mead and Murrell Gardens comprehensive development fronting single access Rd.
- ✧ Allowing appeal would set precedent with regard to others with large rear gardens
- ✧ Cumulative effect of piecemeal developments lead to more serious harm to the character of the area

The Developments of 12 Downview Rd (Chantry Mead) APP/3810/A/07/2059083 and Greenoaks (Murrell Gardens) APP/3810/A11/2152609 were approved **BUT** key to the approvals was a strong concern about the effect on the appearance and character of the existing locality, as follows:

Chantry Mead....

Paragraph 30. ... that there was sufficient separation between dwellings and property adjoining site to avoid loss of privacy and visual intrusion

Paragraph 32 ...the curved form of the access road and landscaped areas (11 households of Chantry Mead) would limit views of the proposal from Downview Rd.

Paragraph 34. 'A landscape scheme is necessary to help assimilate the proposal (Chantry Mead) into its surrounding and soften the impact on surrounding properties'

And Greenoaks (Murrell Gardens) ...

Paragraph 15 and 30 ... could be achieved without harm to the character and appearance of the surrounding residential area.... and in order to protect

2) Amenity Open Space.

The requirement for amenity open space stood at 576 sq m for the 11 dwellings in Chantry Mead (52 sq m per dwelling). The whole surface water management scheme for Chantry Mead was changed, at ADC insistence, to ensure that the Open Amenity Space requirements were met. Chantry Mead currently has 673 sq m. of amenity open space. If 3 dwellings are effectively being added to that development, the required total should increase. The proposed development provides no additional open amenity space but instead takes existing amenity area for the new build gardens, so would be short of the ADC 2000 SPD requirement.

Failure to bring the extended Chantry Mead up to either the 2000 or 2020 standards would be allowing piecemeal development to avoid such provision altogether

3) Surface Water Management.

The drainage Statement in the planning file is a repeat of that submitted for BN/51/20/PL dated Feb and May 2020. The Principal Engineer review of that submission stated that ground water investigations should be undertaken at an agreed time and locations, likely to be December/January.

That peak groundwater levels in the adjacent development (Chantry Mead/ CM) were found to be very close to the surface making infiltration not feasible.

That the drainage design could be very challenging on this (CM) site.

That the development if approved must be adequately drained and not increase flood risk elsewhere

That development 'shall not commence other than works of site survey and investigation, until full details of the proposed water drainage scheme have been submitted to the local planning authority' etc

This has clearly not been carried out in an area where the whole locality is a high-risk flood zone for surface water flooding. A huge concern to local homeowners.

The on-line planning file gives no indication of the style or design of the new roadways serving the new houses. The Chantry Mead roadway is porous block paving, draining surface water through to a soakaway and the attenuation tank. It is vital that the new roadways have an appropriate appearance and a surface water management system that does not spill water onto or into the Chantry Mead roadway or system.

The original proposal for the Chantry Mead development included soakaway/infiltration surface water management but this was rejected by the Environment Agency on the grounds that the locality could not provide the required 1m of unsaturated ground beneath infiltration units during wet winters.

BN/150/20/PL proposes infiltration management for surface water BUT the online planning file appears not to contain groundwater monitoring test results. The file contains 2 statements: Infiltration Test Results dated 23 March 2020 and the other Drainage Strategy Statement dated 13 May 2020. The latter states that ground water monitoring results are attached to the report BUT no such document appears to be either attached or elsewhere in the planning file. The document that is present claims that no ground water was found "up to 1.5m bgl" - however the document also states that the bottom of the proposed soakaways will be 0.9m bgl and drainage standards require at least 1m of unsaturated ground below a soakaway in a wet winter. The highest acceptable level for BN/150/20/PL would therefore be 1.9m bgl. ADC Drainage standards also require that ground water depths are monitored for an extended winter period, usually over 12 months – this does not appear to have been done for BN/150/20/PL.

A ground water report supporting the Murrell Garden applications EG/4/10 and EG/63/10 conducted groundwater monitoring over 3 months, from January to March 2010, recording 18 results across 3 bore holes. The lowest water level recorded was 1.42m bgl, the highest level was 0.00m bgl (at the surface, though later removed). The nearest test hole to the houses proposed in BN/150/20/PL was some 60m to the south west and recorded a highest ground water level of 0.39m bgl on 3/3/2010. This level is 1.51m higher than would be acceptable for BN/150/20/PL. The three test holes for the Murrell Gardens report were spread over a linear distance of 120m in an NNE to SSW direction and the test results never varied by more than 0.27m. This would suggest that the location for the houses in BN/150/20/PL is likely to have a winter groundwater level no lower than $0.39 + 0.27 = 0.66\text{m bgl}$, which is 1.24m higher than would be acceptable for 0.9m-deep soakaway.

Environment Agency Flood Maps show the gardens to the rear of Nos 20 & 21 Downview Road, near to the proposed development, to be especially prone to surface water flooding and show that the ordinary water course to the west of Chantry Mead, 60+m from the proposed development, is also prone to flooding.

In addition, the proposed development will use, for both construction and ongoing access, the Chantry Mead roadway, which is a privately maintained part of the SUDS for that development. Condition 9 attached to planning approval EG/15/07 and conditions 6 & 7 attached to EG/63/10 were conditions precedent requiring that provisions for the lifetime maintenance of the SUDS should be accepted in writing by ADC before construction commenced. These requirements must be included in a condition attached to any approval granted for BN/150/20/PL. Furthermore, to maintain compliance with those earlier conditions, the effects of adding 3 more houses to the number making use of elements of the Chantry Mead SUDS must be addressed in any conditions attached to BN/150/20/PL and in the necessary revisions to the deeds of all the houses affected.

The surface water drainage plans covering the A29 Realignment Road which will back onto Chantry Mead and Murrell gardens rear properties, is not yet clear. Given the proximity of the Realignment to the properties the surface water run-off from this potential build must be considered before extending Chantry Mead by a further 3 homes.

4) Hedges around front gardens and safety

The site plan indicates that all the proposed dwellings will have hedges around the front and side garden perimeters. None of the 23 houses in the body of the neighbouring Chantry Mead and Murrell Gardens developments have front hedges, which means that the proposed development would be even more “incongruous in the context of the locality and poorly related to the established pattern of development in the area”, thereby failing to meet the requirements of Policies D DM1, D SP1 of local plan and Policy ES6 of B and E NDP (2014) and NPPF paras 122 and 127. The hedges fronting plots 1 & 2 also have the potential to create a pinch-point preventing pedestrians, the disabled and families with small children & pushchairs, stepping off the 4m combined road & pathway when meeting large commercial vehicles. Chantry Mead has no street lights and the disadvantages will become more intrusive as the hedges grow thicker and taller over time

The proposed two access points for the 3 dwellings would likely create a safety risk particularly since these are directly opposite the parking areas for CM properties 4,5 and 6 and approached by a blind bend.

5) Construction Management Plan

If the proposal should be approved, the construction management plan must provide written and actual protection for the integrity and cleanliness of the existing roadways, gardens and other

green areas as well as for the health and safety of existing residents and visitors of all ages and abilities at all hours of the day and night. Details should be submitted and approved in writing by the Local Planning Authority.

It should be remembered that the Chantry Mead roadway is porous block paving, draining surface water through to a soakaway and the attenuation tank and must be protected from damage by heavy vehicles.

6) Design and Access Statement.

This document does not exist on this planning application file but was submitted in the previous refused application BN/51/20/PL

What are the plans regarding the utilisation of the existing access arrangement? The previous application statement stated it will be utilised and improved allowing for easy access and egress to and from the site. Details not apparent from the planning application and does not recognise the potential damage by heavy construction traffic to either Downview Rd access or the Chantry Mead block paved Rd.

**Sandra Hulley
15 Compton Ave
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Davina Bowley

From: Amanda Scholes on behalf of Planning.Responses
Sent: 11 March 2021 09:52
To: Planning Scanning
Subject: FW: Objection to Planning Application BN/150/20/PL
Attachments: Objection BN15020PL V2.docx

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From: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Sent: 11 March 2021 09:47
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Objection to Planning Application BN/150/20/PL

Please upload attached to the above application. An Objection.

Thank you

Maria Tomalova
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From: Sandra Hulley <sandra.hulley@arun.gov.uk>
Sent: 11 March 2021 09:23
To: Maria Tomalova <Maria.Tomalova@arun.gov.uk>
Subject: Objection to Planning Application BN/150/20/PL

OBJECTION TO PLANNING APPLICATION BN/150/PL

Arun District Council
Planning Department

Maltravers Rd
Littlehampton BN17 5LF

For the attention of Ms M Tomalova

Dear Ms Tomalova

Please find attached my objection to the Planning Application BN/150/20/PL. Unfortunately due to the size of the attachment I have not been able to add my comments onto the Planning Application site.

I would appreciate your acknowledgement that the attached has reached you safely.

Regards

Sandra Hulley

15 Compton Avenue Goring By Sea, Worthing BN12 4UJ