

From: Simon Davis
Sent: 14 October 2020 16:26
To: 'Jack Dowling' [REDACTED]
Subject: BR/122/20/OUT Garth House, High Street, Bognor Regis

Dear Jack,

I write to update you with our thoughts on the application. We consider this to be an overdevelopment of the site and we would likely refuse the application on grounds of overdevelopment and harm to residential amenity. Our particular concerns are as follows:

- (1) The proposal develops the whole plot with no space left for private amenity (note that the emerging Design Guide requires private amenity space for flats in the form of 3m² balconies/patios or a communal space of 40m² + 10m² per flat not having a balcony/patio).
- (2) The lack of space within the site means that the cycle and bin stores are on the front and this may be harmful to visual amenity/the streetscene.
- (3) I note that the scheme suggests a partial betterment to existing residents in that the building will be only 1 storey on the western side of the site (currently it is 2). However, the new building will extend further back into the site and the eastern half will have an additional storey. Although no west facing windows are proposed, I note that doors to the flats open onto an external space which may have windows in it and offer views of neighbours. I apologise if this is not correct but without external elevations it is difficult to work out this arrangement. Also the new building is to the east and may affect light reaching the windows and gardens of the existing dwellings. It may also be considered to be overbearing.

Note that it has been somewhat difficult to precisely assess the harm to existing dwellings as to work out the distance between say the doors to the first floor flats and the rear first floor windows of 3 Campbell Road means measuring part of the distance on your floorplan and part on the block plan. I got around 22.8m but according to our GIS, the distance from the back wall of 1 Campbell Road to the eastern edge of your site is 16.31m so the measurement from the plans can't be right. It may be that the scale is wrong or the plans have not been uploaded at the right size. Could you look into this please.

- (4) The nil parking proposal requires submission of a Parking Capacity Survey as per the requirements of our Parking SPD – not yet provided so would form an additional refusal reason.
- (5) We need a biodiversity enhancement plan to demonstrate biodiversity net gain – not yet provided so likely to form an additional refusal reason.
- (6) Flats within the town centre area are exempt from CIL therefore, we can still seek S.106 contributions. A S.106 would be required for the Pagham Harbour contribution, affordable housing, education/libraries/fire infrastructure and off-site open space/play/sports pitches/built leisure facilities. As we are not able to approve the application, this would form an additional refusal reason.

It is my aim to determine the application for refusal before the expiry in November but if you wish, you may withdraw the application in the meantime.

Kind Regards

Simon

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