

Ref: EP/52/18/PL

FAO. Mrs A Gardner, Planning Services,
Arun Civic Centre,
Maltravers Road,
Littlehampton,
West Sussex,
BN17 5LF

21st May 2018

Dear Mrs A Gardner,

Re: Local Planning Authority Reference EP/52/18/PL

For: Demolition of existing dwelling & the erection of 7No. residential dwellings, with associated parking, amended access location from Lime Tree Close & landscaping.

At: Scorton 9 Lime Tree Close East Preston BN16 1JA.

We write to formally object to the above planning application for re-development of the land adjacent to our property.

Our grounds for objection are based on a number of elements of the application which would have unacceptable impacts upon our property as a listed building and the overall character of the area.

Justification for Development

The sole justification for this development is to meet a shortfall in the Arun district Council five-year housing land supply. Whilst we appreciate the need to meet the demand for new housing this in itself does not justify the need to demolish an existing, functional building and replace it with such a large scale, cramped development.

Historic Environment

Of primary concern are the potential impacts on the historic status of our property that development of this plot would have both during construction and in the longer term. Wisteria Cottage is a grade II listed 18th century building of significant importance within the village. As a well-recognised landmark, it appears in paintings and postcards of East Preston and frequently attracts photographers and artists.

The three terraced cottages (Street Cottages) located within the currently undeveloped western end of the site would have the most impact upon our property as they would be a completely new building on previously undeveloped land and in direct view from us.

The Arun District Local Plan 2003 and the emerging draft Local Plan 2011-2031 contain several policies in regard to protection of heritage assets. Particularly relevant is policy DEV11 of the Local Plan (adopted 2003) which states that '*proposals which adversely affect the setting of a listed building will be resisted*' and '*proposals for more distant buildings....will be carefully assessed in respect of their effect on the settings of listed buildings.*'

The emerging local plan includes more detailed policies in relation to heritage and HER DM1 sets out a number of considerations for listed buildings, primarily ensuring that proposals which affect them preserve and enhance the historic character and setting of the building.

Whilst the application does include a heritage statement, this appears to be a desktop assessment only which makes conclusions without any site visit or current photographs to show the extent of such impacts when viewed from our property. The statement does acknowledge that Street Cottages are located within the setting of Wisteria Cottage, however the setting of Wisteria Cottage includes the grounds at the front of our property which are only 13.5m from the proposed flint wall in front of the Street Cottages. The 18m between the proposed Street Cottages and Wisteria Cottage as identified in the planning statement is misleading and shows the inaccuracy and poor quality of the statement and does not constitute a careful assessment of the impacts. In fact, the assessment produces no detailed evidence to prove the claim that the quality of the development would protect and enhance the setting of our cottage.

Design & Amenity Impacts

The fact that both national and local planning policies outline the overall need for additional housing should not be taken to mean that all development is automatically acceptable. Local plans include a number of formal assessments and allocation plans intended to ensure appropriate densities and locations of housing development. As such the draft local plan, currently under consultation sets out a number of strategic sites, which are allocated for development as part of the plan. This proposal is not an allocated site within the Local Plan or the East Preston Neighbourhood Plan.

In addition to the location of housing in the district the new local plan also sets out guidance on the mix of housing that is required across the district. Policy H DM1 states that *'the council will seek a mix of dwelling types and houses to include affordable housing units.'* Although we recognise that this site falls below the 11 unit threshold to require an element of affordable housing, this policy does go on to state that *'the tenure mix for development schemes shall be negotiated on a case by case basis and that developers should have regard to the most up to date version of the SHMA.'*

The overall design and layout of the proposal does not appear to be justified by the SHMA and therefore it has not considered the actual needs of the locality in terms of the types of houses proposed.

In terms of design, policy D DM1 of the emerging local plan sets out a range of criteria that should be considered. Of particular relevance are character, density and scale of development. Although the individual houses have been designed to respect the local vernacular, the density of the development remains out of proportion to the surrounding properties. The proposal has not correctly taken into account the density of development in line with part 13 of policy D DM1, as its calculations of the surrounding housing density has only considered the other properties along Lime Tree Close and not the overall setting of the plot which includes The Street, Vicarage Lane and St Mary's Drive, all of which consist of much lower density development.

Notably the proposal also fails to address the impact this development would have on the other two listed buildings on this part of The Street. Apple Tree Cottage/Jasmine Cottage and Forge Cottage are within 50yards of the proposed development.

The character of an area is not only defined by the design and appearance of buildings but also their size, scale and setting. The properties surrounding this site are generally fairly large detached family homes set within good sized gardens. Those proposed in this development are small, narrow properties with much smaller gardens and therefore do not represent a scale of development that is in keeping with the general confines of the character of the locality as required by point 14 of policy D DM1

In addition to the overall impacts on the character of the village the proposal, particularly The Street Cottages, would form a very dominant structure directly opposite our property. Not only would this detract from the attractiveness and historical significance of the listed building but also due its orientation directly facing Wisteria Cottage be very overbearing and intrusive. The upper-storey windows of the cottages would overlook our bedroom window at the southern end and our garden at the northern end. Overall, the design and orientation of the Street Cottages would compromise our privacy.

Ecology

The proposed site is one of the largest single house plots in the vicinity with an extensive undeveloped garden. Private gardens represent important habitats for wildlife and as such should be maintained where possible, however; the proposal to intensively develop this site would result in a significant loss of habitat.

Policy ENV DM5 of the emerging local plan, specifically requires that '*all development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats onsite*'. It is not clear from the submitted documents, how the development would achieve this. Although the site layout plan does include a variety of planting, this seems mainly to be for screening and privacy value, rather than ecological benefit as the condensed layout leaves very few opportunities for enhancing biodiversity.

We also note that the ecology officer has submitted comments with regards to the need for additional bat surveys as identified within the ecological appraisal. We would expect that these appropriate protected species surveys are undertaken before any decision is made on the application.

Summary

The redevelopment of this site to create 7 additional properties is a poorly conceived design which is excessive and out of character and scale compared to its locality. The layout and design would have a totally unacceptable impact upon the historic setting and amenity of our cottage immediately adjacent to it and on the other nearby listed buildings.

The submitted heritage statement is both inadequate and inaccurate as it includes no physical assessment of the impacts and fails to appropriately evidence its conclusions. The proposal therefore does not meet relevant policies of the Local Plan in terms of protection of the historic environment.

The proposal has not been accompanied by an appropriate ecological survey to ascertain the presence or absence of protected species, contravening national and local planning policies in relation to protection of the natural environment.

In conclusion, this is an unsustainable development, which would have significant impacts upon the local character of the area including listed buildings, which not be outweighed by the benefits that such a cramped development would bring in terms of increased housing stock.

We believe that if the redevelopment of this site is truly necessary a more sensitive design of a smaller scale would be much more appropriate.

Yours sincerely,

Dr and Mrs T Atkinson

Wisteria Cottage
The Street
East Preston
BN16 1HZ