

7, Felpham Gardens
Felpham
Bognor Regis PO22 8QS

March 24 2019

Mr. R. Castro-Parker
Senior Planning Officer
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton BN17 5LF



Dear Mr. R. Castro Parker

Re Planning Application FP/274/18/PL

I refer to the March 12th 2019 follow up letter from Rodway Planning and wish to make the following comments.

The attempt to make a case for the development of two properties to replace the property currently occupying the site using patterns of development and sizes of plots elsewhere in Felpham as a benchmark clearly glosses over, in fact totally ignores, the long established and unique character and history of properties in Felpham Gardens. From the removal of established/mature trees on the site prior to the planning submission, it appears very clear that the intent from the outset was to build two properties on the site, disregarding environmental issues, in contravention of Arun District and Felpham Neighbourhood Plans, impact on neighbours, noise, visitors to King George V Park, or any other factor. In addressing these matters, assurances are offered - in the view of the agent/developer - that "no harm would be resultant".

In respect of the numbered comments in the Rodway Planning letter, I respectfully wish to comment against each as follows:

1. From the documents available I have not seen any reference that the site is owned by Admiralty Developments Ltd, (Construction of Domestic Buildings) - owned by Mr Barnes and Ms Reddie. For the sake of transparency, this fact should surely be clear across the application. Without this information there is no clear audit trail to the actual development company and its limitation of liability.
2. Whilst I understand that none of the trees purposely removed to support planning submission for two dwellings were subject to tree preservation orders, the removal of the trees was in breach of Arun District and Felpham Neighbourhood Plan environmental policies – (as previously identified in my original objection):
 - a. Arun District Plan - Policy ENV DM4 is a detailed policy referring to the protection of trees. This policy includes the provision that where there are existing trees on or adjacent to a development site, developers shall be required to provide a land and tree survey, a tree constraints plan and an arboricultural impact assessment to include a tree protection plan and an arboricultural method statement. **(Not complied with – avoided by prior removal of trees on the site.)**

- b. Arun District Plan - Policy D DM1 Para 7 - Trees and woodland whereby all new development will be expected to incorporate existing and new tree planting as an integral part of development proposals. **(Not complied with – avoided by prior removal of trees on the site.)**
 - c. Felpham Neighbourhood Plan - Paragraph 4.34 – Policy ESD1 requires the development to contribute to local character by creating a sense of place appropriate to its location. **(The removal of trees and replacement with 2 buildings in place of one, contradicts the policy and deviates from local character.)**
 - d. Felpham Neighbourhood Plan - Paragraph 4.38 – Policy ESD9 requires development proposals to be designed to retain ancient trees or trees of good arboricultural and amenity value. Proposals should be accompanied by a tree survey that establishes the health and longevity of any affected trees and a management plan to demonstrate how they will be so maintained. **(Not-complied with – trees removed to avoid compliance.)**
 - e. Felpham Neighbourhood Plan 8.12. “Trees are a major feature of Felpham and contribute to the open and pleasant feel of the village, its parks, play areas, residential properties and the many private estates. The removal of trees to make way for development can completely change the amenities of a road and must be resisted.”
3. Whilst the tree officer may not have objections to the application, the subsequent comment by Rodway Planning that “the applicant has not acted improperly and that the proposed development will accord with the relevant tree related policies in the Felpham Neighbourhood Plan and Arun District Local Plan” is totally erroneous and misleading. The tree related policies detailed in 2. above are very clear. These issues of covert non-compliance raises the question as to whether developers should be afforded any planning consent, especially where there have been breaches of both Arun and Felpham environmental policies - and whether the authorities have the ability to impose additional penalties. The removal of the trees to prevent hindrance to the proposal, and the non-submission of how *(previously)* existing trees on the site may be protected/incorporated into the plans must be challenged to prevent such action becoming a precedent for other sites.
4. No comment on the removal of the ash tree on Council land – other than a question to the council as to why the tree was removed in contravention of its stated protection of trees.
5. Biodiversity. A visit to the site may well confirm the site appears to hold no biodiversity value. Unfortunately, whatever biodiversity may have existed before the trees were cut down we will never know – as there was no prior completion of a Biodiversity checklist. However, what is clear, is the irreparable damage to the environment/eco system in the area of King George V Park caused by the removal of so many trees.
6. Building Line. The original statement by Rodway discusses the building line being brought “marginally further forward” - and now described as “further forward”. Scope creep already.
7. Parking. The proposal of a parking place on the site just off Felpham Gardens road, adjacent to the current drive, appears to block one of the available public parking places.

8. No doubt the owners of Casa Mia will have their own views on the "public comments" as referenced by Rodway Planning. However, the comment by one "supporter" who does not live in Felpham, of "that's the way it is" (the proposed development), inferring the owners of Casa Mia should just accept the situation - was totally inappropriate to the point of being offensive.
9. As the paid agent of the development company it is understandable that Rodway Planning support the development. In respect of the "letters of support", no doubt as well-known business people in the area, Mr Barnes and Ms Reddie will have many supportive contacts. One of the letters of support is apparently the Secretary/Director of a Property Management Company, so possibly a conflict of interest.

Finally, Rodway Planning's simple reference to the Government's intention for development does not address all the factors involved. What is really at stake is the intention to maximise financial returns by the construction of two buildings instead of replacing the current building, through disregard of Arun District and Felpham policies and procedures developed to maintain the highest environmental standards for inhabitants and visitors as outlined above. There is little use in developing environmental policies and procedures if they cannot be enforced.

Yours sincerely

A large black rectangular box redacting the signature of Chris Jackson.

Chris Jackson

1. The first part of the report deals with the general situation of the country and the progress of the work during the year. It is a summary of the work done by the various departments and a statement of the results achieved. It is a general statement of the work done by the various departments and a statement of the results achieved.

2. The second part of the report deals with the work done by the various departments during the year. It is a detailed statement of the work done by the various departments and a statement of the results achieved.

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