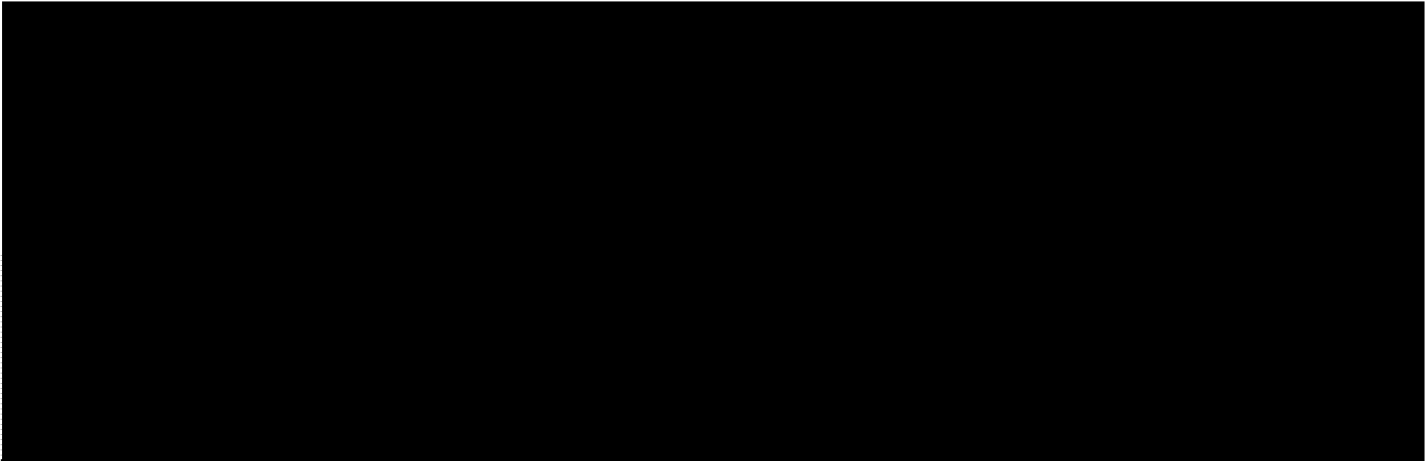



From: Colin Giddings
Sent: 01 August 2018 16:24
To: Anita Gardner
Cc: Planning
Subject: FW: LU/191/18/DOC

Hi again Anita.

I've had a letter and some documents from Mr Molica-Franco in response to the comments I made about the discharge documents (attached). I'd like to be in a position to make recommendations and so on for him but cannot do so -- apologies for this.

I don't know how rigid your interpretation of the planning conditions will be because, as things stand, there is likely to be some conflict between the licensing requirements and the conditions attached to LU/258/16/PL -- for example the planning requirement is that the site must be in accordance with certain plans yet I will not be able to grant a licence if the specifications shown on the plans are followed.

I have included some additional comments below after my response to the submission which I hope helps clarify things. Please let me know if you want to chat things through.

Condition 5 – CMP

The development's construction works are larger than the original application indicated. Provided the CMP follows the previously attached guidance (or similar) then EH requirements would be satisfied.

Condition 6 – Lighting

Site lighting will need to enable the safe movement of people around the site from dusk to dawn (model licensing condition). Several pictures of lights have been submitted but without detailed specifications (power output, positioning, dimensions, etc.) needed to assess a lighting scheme. It will be for the applicant to select and propose a functioning lighting scheme that will meet the model standard.

Condition 8 – cycle shed

This is not an Environmental Health proposal, however, the construction and positioning of the shed will be critical in regard to the safe use of the site, particularly where a timber model is proposed. There are insufficient details at present.

Condition 9 – Sewage treatment

The brochure for the BioPure ASP25 model provides better detail. If the proposed Mobile Homes are two bedrooms but comprising a maximum of 3 persons each (i.e. a double bedroom plus a single) then 21 residents may be on site (plus guests). It is assumed that the office is also to be connected to the system – giving an additional load, albeit without shower or bathing facilities. The ASP25 will be an absolute minimum requirement in terms of capacity but is acceptable in relation to the current specifications.

However, please have regard to the following:

- The proposed caravans are designed and built as holiday or leisure homes. They are not suitable for residential accommodation and cannot be built to that standard (i.e. BS3632:2015) according to the producer's technical specification. A residential site licence would not allow for this type of mobile home.
- The plans show timber sheds provided on each pitch. Model licensing standards will not permit timber storage facilities within the separation distances provided for health and safety reasons. If the sheds are not within the separation distances they may be permissible – this will depend on the final dimensions of the residential mobile home units provided on site.

Kind regards,
Colin

Normally working Thursdays, Fridays and alternate Wednesdays

Colin Giddings | Sr. Environmental Health Officer, [Arun District Council](#) | Location: Third Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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From: Colin Giddings
Sent: 25 July 2018 14:03
To: Anita Gardner
Subject: LU/191/18/DOC

Hi Anita,

I've had a quick look at the conditions discharge documents which relate to EH/Site Licensing and would comment as follows:

Condition 5 –CMP

in order for the site to become a residential mobile home park some hard-standings for the mobile homes will be required. The original application specified pitches 9.5m x 16.5m, which would take, as an absolute minimum, 16cubic metres of concrete, plus hard-core, etc. The CMP described seems to look only at the office building phase.

Although the potential for noise and dust nuisance can be dealt with under Environmental Protection Act powers it would be best if the CMP follows the example attached, or other locally approved plan.

Condition 6 – Lighting

When operating as a residential mobile home park the site's licence will contain specific conditions based on the current Model Standards. The standard for lighting states: *Roads, communal footpaths and pavements shall be*

adequately lit between dusk and dawn to allow the safe movement of pedestrians and vehicles around the site during the hours of darkness.

The guidance accompanying the Standards states: *The lighting provided for communal paths and roads should be adequate to allow safe movement around the site during the hours of darkness. Many sites use low lighters rather than traditional street lamps and these work well as long as they are well maintained and plants/vegetation are not allowed to grow around them and stop them emitting light effectively. The lighting must be fit for purpose i.e. to allow vehicles and pedestrians to navigate around the site between dusk and dawn*

The proposed scheme using luminaires that are solar powered and just 170mm high is unlikely to meet these criteria, especially outside of the summer. If the Condition is discharged by allowing the proposal there will need to be supplemental lighting installed to meet the licence conditions. It would be better if the accepted scheme meets the future licence conditions.

Condition 8 – Cycle Store

There is mention of a plan for the proposed wooden structure but I have not had sight of this. The site will need to comply with spacing and safety standards when in operation. Without details of the proposed structure I cannot comment further.

Condition 9 – Sewage Treatment

There is insufficient detail to comment on the proposal. A Bio Pure unit will be satisfactory in principle but details of the model proposed are required in order to determine whether there is sufficient capacity for an office plus eight, two-bedroomed units.

Do let me know if any queries,

kind regards, Colin

Normally working Thursdays, Fridays and alternate Wednesdays

Colin Giddings | Snr. Environmental Health Officer, [Arun District Council](#) | Location: Third Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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