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From: Juliet Harris [redacted]
Sent: 03 September 2014 12:31
To: Planning
Cc: Nicola Spencer
Subject: Urgent - Consultee Comments on planning applications LU/221/14/PL, LU/222/14/PL, LU/223/14/PL, LU/224/14/PL and LU/227/14/PL
Importance: High

In light of the problems with the website I have been advised to send these comments in to the District Council using this email address. As the deadline for comments on all applications is tomorrow, 4th September, I would be very grateful if someone could acknowledge safe receipt of this information.
Thank you.

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ARUN DISTRICT COUNCIL LU/223/14/PL

The Town Council's Planning and Transportation Committee considered planning applications LU/221/14/PL, LU/222/14/PL, LU/223/14/PL, LU/224/14/PL and LU/227/14/PL at their meeting held on 26th August 2014.

Given that the application formed part of five individual proposals for the construction of a number of affordable homes in the Joyce Close and Greenfield areas of Littlehampton, the Committee considered that they would have a significant cumulative impact on the area. In view of the close proximity of the sites, Members felt that in order to understand this cumulative impact, it was more appropriate that the plans be assessed collectively, although comments on the individual applications were also considered. The following comments therefore apply individually to each application.

The Committee was strongly of the view that the proposals constituted an overdevelopment of the Joyce Close and Greenfields areas as they would increase the overall density levels on the estate. It was felt that by cramming as much housing as possible on to the individual sites, the District Council was behaving in a manner contrary to its own housing policies which advocate the growth of housing which is "designed to consider wider economic, environmental and social regeneration ambitions including developing the right mix of housing to meet existing and future needs and prevent social polarisation", as set out in the Policy document "Raise the Roof". Far from delivering "an improvement in the quality of life for residents living in the most disadvantaged areas of the district", the proposed housing would encroach upon verges and embankments in the area. Noting that major roads such as the A259 were expected to expand, the Committee considered that the impact that this would have on the residential amenity of both the current and new residents was especially of concern. A factor that was recognised in the Noise Assessment, which stated that the area was already subject to reasonably high levels of noise emanating from the nearby A259. Members also noted that the level of noise was unacceptable on some sites under current World Health Organisation guidelines.

Members also questioned the observation that there was sufficient proposed onsite parking to cater for the increased demand generated by the new development. Based on their knowledge of the area, Members considered that parking in the area was already fully utilised and that the proposed development would exacerbate the problem as the proposed new off street parking was not as accessible to existing residents as the current parking. It was also thought that the assessment of parking survey had been undertaken at an unrepresentative time. Furthermore it was noted that green space and hard standing would have to be sacrificed to provide parking adding to the overall cramming of housing.

Overall, it was thought that if anyone other than the District Council had submitted these plans, they would not be acceptable as they fail to deliver the balanced and sustainable communities envisaged in the District Council's Policy document "Raise the Roof". The Committee was unanimous in its opposition to each of the proposals and objected to the planning applications on the grounds that they constitute an over development of the area, would have a detrimental impact on the residential amenity of neighbouring properties and the insufficient and inappropriate siting of parking provision.

In addition, the Town Council wishes to draw the Planning Authority's attention to the following points:-

Parking

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'Based on observed onsite parking there is sufficient proposed onsite parking to cater for the existing demand and the new development demand combined.'

Comments:

- The estimated parking on each site are based on conclusions from one parking needs survey carried out the week before Christmas 2013 that on street parking could be reduced.
- No displaced parking due to development will occur based either on full current onsite capacity or observed levels (LU/223/14)
- New offsite parking uses the green strip/verge to edge of Greenfields (LU/227/14)
- The proposed new offsite parking is not as accessible to residents of existing housing as the current parking.
- For the new houses that are facing northwards access to parking for shopping etc. is very poor

Soil Infiltration Testing

'The infiltration testing across the sites has shown variable but overall poor results. Best values were seen at shallow level at the east of the investigation area' (LU/221/14 & LU/222/14)

'At this site it was not possible for the water to fall below the 25% fill depth (within the BRE guidance) in TP3B and TP4B within the time available and as such only fall levels to between 39% and 44% were recorded' (LU/224/14, LU/223/14 & LU/222/14)

Comments:

- The infiltration testing of sites *LU/221/14 & LU/222/14* showed the best results but these were still not good. Is it appropriate to build more houses if this is a problem?
- It appears that at sites *LU/224/14, LU/223/14 & LU/222/14,* in spite of renewed testing are showing very slow land drainage. Is it appropriate to build more houses if this is a problem?

Ecology Study

Comments:

- This was a desktop study that assessed within a radius of 1km of the site so included West Bank. The basis of the analysis is questioned as it relies on a comparison between two distinct areas - Wick and the West Bank.
- A more relevant study might be to see how they could improve the existing ecology as there has been very little done to protect existing green spaces

Technical Note – Transportation

Comments:

- Each site has been assessed separately which for a number of dwellings which do not require a formal Transport Assessment. It is unclear if the applications have been assessed collectively
- The report concludes that '*the site layout allows sufficient room for refuse and service vehicles to negotiate*'. The 'swept path analysis' is very tight to the new parking bays and would block access to new housing

Noise Assessment

'The sites are subject to reasonably high levels of noise emanating from the nearby A259' - The majority of amenity areas will be subjected to levels of noise that would be unacceptable under WHO guidelines.'

Comments:

- These conclusions particularly affect houses that face towards the north and have very small front gardens

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Design & Access Statement

Comments:

- *'The proposals are for a low density scheme that retains a good amount of green space, either as private rear gardens, or sizeable landscaping buffers to the site perimeter'.* As concluded in the noise assessment report the level of noise is unacceptable on some sites under WHO guidelines.
- *The proposals are for a low density scheme that retains a good amount of green space, either as private rear gardens, or sizeable landscaping buffers to the site perimeter'.* Does this include the 2m brick acoustic barrier? (LU/227/14)
- The poor access to this development is very evident and has been subject to a high number of comments from residents
- The Statement of Community Involvement is a very brief assessment of the issues identified and implies that residents were largely in favour of the developments

General Comments

- The overall design is in keeping with existing housing
- The layouts are reasonable but frequently face in directions that make pedestrian access difficult particularly for people with mobility problems or young families
- Small areas of green space are taken to improve traffic access
- All of the developments take away 'breathing spaces' between housing which is increasing the overall density levels of the estate

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