

From: Simon Davis
Sent: 26 May 2017 11:05
To: Planning.Responses
Subject: FW: Bowley Farm: P/22/17/PL

EH Comments (attached)

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Arun District Council |
Location: 1st Floor, Arun Civic Centre, Maitravers Road, Littlehampton, BN17 5LF
Internal: 37874 | External: +44 (0) 1903 737874 | E-mail: simon.davis@arun.gov.uk

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Colin Giddings
Sent: 26 May 2017 08:47
To: Simon Davis
Subject: RE: Bowley Farm: P/22/17/PL

Hi Simon,

Please see attached response. I have had advice from Legal that the current situation is a licensing offence so will be contacting the site operator asking them to regularise the situation (i.e. get a licence [which means they must hold the requisite planning permission] or cease all year round use).

Do let me know if you have any queries on this,

Kind regards, Colin

Working Thursdays, Fridays & alternate Wednesdays

Colin Giddings | Snr. Environmental Health Officer, Arun District Council | Tel: +44 (0)1903 737586
Location: Third Floor, Arun Civic Centre, Maitravers Road, Littlehampton, BN17 5LF

Visit Arun's web site at www.arun.gov.uk/eh



Save the environment - think before you print.

Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex. BN17 5LF

Tel: (01903) 737755

Fax: (01903) 723936
DX: 57406 Littlehampton
Minicom: (01903) 732765
web: www.arun.gov.uk/eh
email: colin.giddings@arun.gov.uk



Please ask for:
Colin Giddings
Environmental Health

Your Ref: P/22/17/PL

Our Ref:

26 May 2017

Dear Simon,

CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)(ENGLAND) ORDER 2015

Applicant: Luken Beck Ltd., 30 Carlton Crescent, Southampton, SO15 2EW
Proposal: Variation of condition 2 imposed under P/72/09/ relating to occupancy dates
Location: Bowley Farm Bowley Lane South Mundham Pagham PO20 1NB

Please have regard to the following comments. I have reviewed the documents available on the planning website, to Arun District Council's relevant site licensing policies & procedures and the National Planning Policy Framework and Guidance.

Considerations

Good site design is an essential element of both the Planning and the Site Licensing regimes. In my view, as the caravans will no longer be for seasonal use, the proposals now fall under the licensing requirements of the Caravan Sites and Control of Development Act 1960 (as amended) and some of the responses below reflect the crossover between the two regimes.

Noise needs to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment. The principle considerations are:

- Whether or not a significant adverse effect is occurring or likely to occur;
- Whether or not an adverse effect is occurring or likely to occur;
- Whether or not a good standard of amenity can be achieved.

Artificial light provides valuable benefits to society, including through extending opportunities for sport and recreation, and can be essential to a new development. Equally, artificial light is not always necessary, has the potential to become what is termed 'light pollution' or 'obtrusive light' and not all modern lighting is suitable in all locations. It can be a source of annoyance to people, harmful to wildlife, undermine enjoyment of the countryside or detract from enjoyment of the night sky. For

maximum benefit, the best use of artificial light is about getting the right light, in the right place and providing light at the right time.

By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The new development proposal has the potential to adversely affect the use or enjoyment of nearby buildings or open spaces, both during the construction phase and when works are completed and the site is occupied, due to poorly designed artificial lighting.

Model Standards

A residential mobile home park must normally be licensed. It cannot be licensed unless there is planning consent for that use. The model standards¹ include a range of factors which must be considered when designing and operating such a park – although no detailed submission is required at this stage, and the Model Standards are not an exhaustive list, it may be worth drawing the applicant's attention to the following:

1. Separation distances between mobile homes should generally be a minimum of six metres
2. Mobile homes should generally not be sited within three metres of the site boundary
3. Roads shall be designed to provide adequate access for emergency vehicles and routes within the site for such vehicles must be kept clear of obstruction at all times
4. Every caravan shall be connected to a road by a footpath with a hard surface which shall be maintained in good condition
5. Every unit must stand on a concrete base or hard-standing. The base must extend over the whole area occupied by the unit, and must project a sufficient distance outwards from its entrance or entrances to enable occupants to enter and leave safely. The hard standings must be constructed to the industry guidance, current at the time of siting, taking into account local conditions
6. There shall be satisfactory provision for foul and waste water drainage. Surface water drainage shall be provided where appropriate to avoid standing pools of water
7. On sites where it is practical to do so, suitable space equivalent to about one tenth of the total area of the site shall be allocated for recreational purposes, unless in the local authority's opinion there are adequate recreational facilities within a close proximity to the site
8. 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 submitted plans address some of the above points but overall there is insufficient detail for an assessment to be made. Of particular note is the absence of provisions for lighting, general drainage and for foul water disposal.

Justification

Having reviewed the development proposal, it has been determined that any noise from the proposed use is not likely to be noticeable at the nearest noise sensitive receiver. As defined within the National Planning Practice Guidance, the noise has no observed effect and therefore no specific measures are required. As such, no conditions are recommended in this respect.

However, it appears that the proposed use is unlikely to comply with the accepted standards for mobile home parks or site licensing requirements. As insufficient information is available for the assessment and determination of the proposed use, I therefore recommend refusal unless a detailed design statement, complying with national and local standards is submitted to, and approved by, the Planning Authority.

¹ Model Standards 2008 for Caravan Sites in England, Caravan Sites and Control of Development Act 1960 – Section 5, DCLG, April 2008 and/or DoE Circ.14/89 – Model Standards for Licenced Caravan Sites

If, contrary to the recommendation for refusal, it is considered that the development is desirable then I recommend conditions as below. At the design stage, a robust assessment and determination of required measures should be undertaken and steps agreed with the Local Planning Authority prior to any works being carried out.

Condition(s)

1. No development shall take place, including any works of demolition, until a Construction Environmental Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for:
 - a. An indicative programme for carrying out of the works
 - b. The arrangements for public consultation and liaison during the construction works
 - c. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, the careful selection of plant and machinery and use of noise mitigation barrier(s)
 - d. Details of any floodlighting, including location, height, type and direction of light sources and intensity of illumination
 - e. The parking of vehicles of site operatives and visitors
 - f. Loading and unloading of plant and materials
 - g. Storage of plant and materials used in constructing the development
 - h. The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
 - i. Wheel washing facilities
 - j. Measures to control the emission of dust and dirt during construction
 - k. A scheme for recycling/disposing of waste resulting from demolition and construction works
2. No development shall commence until a detailed scheme of external lighting has been submitted to and approved in writing by the Local Planning Authority. The development should be carried out in strict accordance with the approved details. The scheme shall be maintained and shall not be altered without the prior written approval of the Local Planning Authority. The lighting shall be installed, maintained and operated in accordance with the approved details unless the local planning authority gives its written consent to the variation.
3. No development shall commence until a detailed design scheme for the pitches and dwellings, reflecting the recommendations of the Model Standards, has been submitted to and approved in writing by the Local Planning Authority. Any works which form part of the scheme approved by the authority shall be completed before any permitted dwelling is occupied unless an alternative period is agreed in writing by the authority.

Yours sincerely

Colin Giddings
Senior Environmental Health Officer