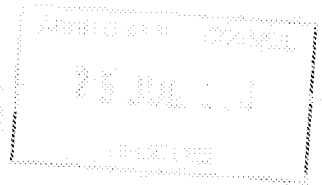


Pagham Beach (Holdings) Ltd



PXL

Woodlands Cottage
Normandy
Guildford, Surrey
GU3 2HT

ACK



Our Ref: JAH/SH

21st July 2011

Director of Planning Services & Housing Strategy,
Arun District Council,
Arun Civic Centre,
Maltravers Road,
Littlehampton, Sussex.
BN17 5LF

Dear Sir,

re. **Town & Country Planning Act 1990**
Application ref: P/47/11
52 East Front Road, Pagham
Proposed extension to existing dwelling

I refer to the above Detail Planning application, which I have viewed on the District Council's website and as owner of adjoining land, would make the following comments:

Location

The application site is situated within a location designated as an Area of Special Character, but unfortunately completely disregards the Policies defined within the Local Plan for the Special Character of the Pagham Beach Estate. The application is therefore contrary to Policy GEN7 and Area 1 of the Arun District Local Plan.

The description of the location within the Design & Access Statement submitted with the Application is incorrect and misleading and demonstrates a complete lack of local knowledge (and interest) by both the applicant and their agent. The Application site does not adjoin The Dell as claimed – The Dell, as local residents are aware, is between Lagoon and Harbour Roads adjacent to the entrance to the Estate. The land to the north of East Front Road is an extension to Bognor Reef and is part of an area of dune systems with interesting flora, including specially protected species listed in Section 8 of the Wildlife & Countryside Act. This land to the north is designated as part of Bognor Reef Site of Special Scientific Interest.

The Application site also adjoins the beach foreshore, which is designated as part of Pagham Harbour Site of Special Scientific Interest.

The Application site is therefore in an environmentally sensitive location and any development proposed should have regard to this.

Over-development/bulk of the proposal

The development proposes a simplistic and uninteresting building without architectural merit and as such therefore conflicts with Policies DV1 of WSCC Structure Plan, and GEN 7 and Area 1 of Arun District Local Plan.

The new building shows a substantial and overbearing bulk within the street scene and should be reduced in size and scale. The bulk of this proposed development, if Approved, will create an unwelcome precedent. It is considered that the present proposal represents a gross over-development of the site and the scheme should be reduced.

There is recent and local precedent for the rejection of a building of such bulk on a site of this nature and your Officers are respectfully requested to have regard to the District Council's decision on application P/111/05 in respect of new bungalow proposed at 60 East Front Road, which was Refused on the grounds of over-development of that site, because it would adversely affect the character of the area.

It should also be noted that the scheme proposes the installation of rooflights within the roof construction, which again is contrary to Local Plan Policies for the Beach Estate, and if allowed will create a precedent, which will undermine the Planning Authority's policies.

Two-storey construction

The proposed extension to the north of the original building is a two-storey structure of basement and elevated ground floor accommodation, which as mentioned above proposes a structure of considerable bulk which it is hoped the Planning Authority would consider unacceptable within the street scene. The two-storey construction is also contrary to Local Plan Policies for the Beach Estate, and if Approved will create an unwelcome precedent.

The formation of a basement with a finished floor level as defined, proposed at 2.74 OAD is over 3.000 (10'0") below existing levels on the adjoining beach foreshore. This is completely inappropriate in this location and in the opinion of the Directors is verging on downright dangerous.

In order to achieve the construction at this depth, excavations to a depth of 12-14'0" below beach level must be created, which in the shingle sub-strata will cause considerable local disturbance. The adjoining site to the east must be protected and maintained stable and as a consequence a substantial retaining wall would need to be constructed on the boundary. These extensive civil works will be extremely destructive adjacent to a shingle foreshore already threatened by erosion from wave action must surely be considered unwise and inappropriate.

The arrangement of the basement boathouse with a ramp down from the foreshore will definitely result in basement flooding with any over-topping event on high tide and/or storm conditions. This arrangement must surely be considered a completely unsuitable proposal which could endanger adjoining properties.

The proposal to position substantial "drop-down" windows directly onto the foreshore would also seem to be impractical in such an exposed location.

For the foregoing reasons therefore the scheme as presently presented should surely be Refused.

Appearance

The appearance of the building is also completely inappropriate within this Area of Special Character and if allowed will create an extremely unwelcome precedent. As mentioned above, the proposal is contrary to Policy GEN7 and Area 1 of the Arun District Local Plan.

Overlooking/overshadowing

As a result of the considerable bulk of the building proposed it is also likely to create a serious overshadowing of the dwellings to the west, which again is unacceptable. In general the development is un-neighbourly and should be Refused by the Planning Authority.

Disabled access

The proposal makes no provision for access for people regardless of disability, age and gender. The Secretary of State has made it clear that access provisions are a Planning issue, and this has been completely ignored in the proposal.

SSSI Protection

As mentioned above the application site abuts the beach foreshore, which is part of Pagham Harbour SSSI. The Planning Authority should also note that the land to the north of East Front Road adjacent to the Application site is designated as part of Bognor Reef SSSI.

It is strongly requested that if the Planning Authority is minded to Approve the development, an Informative is included within the Decision Notice, which notifies the applicant and their contractor that there must be **NO** storage of materials upon nor disturbance of the SSSIs as a result of the construction works.

For the foregoing reasons therefore, the Company, as adjoining owner, strongly objects to the current proposal and would urge the Planning Authority to either Refuse the application, or request substantial revisions in order that the replacement building proposed fully complies with Local Plan Policies. In view of the footprint of the building proposed upon the site, it is also requested that the District Council removes Permitted Development Rights, if it is minded to Approve this application.

I would be grateful to be advised the Planning Authority's decision upon this application, when it is known.

Yours faithfully,


J.A. Higham MRICS
Secretary

cc The Clerk, Pagham Parish Council
Chairman, Pagham Beach Residents Association
Natural England, Regulation & Enforcement Officer – S.E. & London Region