



Our Reference: 1050P/ConsRespLet/AB

Simon Davis
Planning Department
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

20 November 2019

BY E-MAIL AND POST

Dear Simon

Reserved Matters Application Associated with Outline Planning Permission P/140/16/OUT-90 Dwellings, Summer Lane, Pagham. ADC Reference: P/70/19/RES

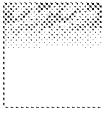
We write further to the meeting of 23 September 2019 and the range of submitted consultation responses relative to the above. As requested we summarise the responses and following consideration of the issues raised provide further information to allow the application to progress towards determination.

Technical Consultees:

- **Natural England-** *No objection*
- **Highways England-** *No objection*
- **Ecology DCD-** *No objection*
- **CDC Archaeology-** *No objection*
- **Arun District Council (ADC) Affordable Housing-** *No objection*
- **Environment Agency-** *Not raising issue and reverting to Lead Local Flood Authority*
- **WSCC Surface Water Drainage-** *No comment made as application is a reserved matters submission. WSCC allowing ADC's engineer to comment*
- **Southern Water-** *Despite seeking an extension of time no formal comments have been made to date*

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- **ADC EHO-** *Not objecting but recommending conditions re electric vehicle charging, hours of construction, need to consider air quality issues, agreement of lighting details, noise levels, land contamination and agreement of a CEMP*

Applicant Response:

In line with WSCC Guidance on Parking at New Developments (August 2019) a total of 43 active charging points will be provided with the remaining parking spaces, where appropriate, to provide passive provision for possible upgrading in future. This equates to 20% of the 213 parking spaces provided on site.

With regard to hours of construction (suggested condition 2) these will be fully detailed within the CEMP required by outline planning condition 16. Given this, neither suggested condition 2 or 7 are considered necessary.

The aspirations of suggested condition 3 regarding air quality are noted, although this seems to be a condition which should have appeared on the outline planning approval if of concern, rather than seeking to retrospectively address the issue through imposition of an inappropriate condition at the reserved matters stage. The applicant is not aware of any changes which alter the context and require the imposition of such a condition.

On the matter of lighting, as reflected in suggested condition 4, it is considered that these requirements have already been effectively addressed within the submitted material for the development site. Indeed, reference should be made to drawings 100046.PRIV.1300.P03 for details. An additional lighting layout has also now been produced for the public open space area– 100090.POS.1301.P01, as requested by the consultee.

Relative to suggested conditions 5 and 6, dealing with internal noise levels and land contamination, these again would appear appropriate of an outline planning permission.

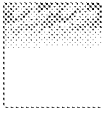
- **Policing Support Team-** *Submission highlights need for car parking to be visible from an active room, need for defensible space, need for adequate defences, need for secure gates, need to promote surveillance in the land south of Summer Lane and highlighting that lighting must be BS 5489:2013 compliant.*

Applicant Response:

This development has been designed with Crime Prevention and good practice in mind. Section 8 of the NPPF gives specific consideration to 'Promoting Healthy and Safe Communities' and this has been a material factor in the layout of the scheme.

Further, the design team have taken influence from the SECURED BY DESIGN - HOMES 2019 Version 2, March 2019, which sets out clear guidance on the best methods for minimising the risk of crime and antisocial behaviour within new developments as a whole, and new individual homes in particular.

Natural Surveillance is promoted by an outward looking development, that gives good observation of the roads, footpaths and all routes through the scheme. Homes look out over all access points and areas of landscaping, promoting self-policing of the development.



The majority of parking spaces associated with the houses are in-curtilage, providing a clear separation between public and private space. This is reinforced by the use of changes in materials, planting and low level boundary treatments to the fronts of properties. They are close to the buildings and in view of front (and where shown on the plans) side windows which will allow surveillance from the homes. Those spaces that are not in-curtilage are in close proximity to the homes and there are no remote parking courts. Visitor parking is within layby spaces that are again, close to and overlooked by properties, rather than in remote locations.

Back and side gardens will be separated by 1.8m high, close boarded fencing with all gates and access points being secure.

The scheme will promote surveillance over the land south of Summer Lane through the encouragement of use by pedestrians, families, dog walkers and other community groups. Pedestrian gates and hedging to the boundary will ensure that the Open Space is secure but visible, with sturdy access gates for maintenance vehicles preventing the use of unauthorised vehicle on the site. Footpaths meander around the Open Space, minimising dead ends or corners. Low level planting of shrubs and standard trees allow for visible lines across the site, removing hidden areas and dead spaces.

This letter is accompanied by a layout plan and strategy for the open space. Any lighting to be installed will meet with all statutory requirements (such as BS 5489:2013) with the relevant certificates and documentation being provided by the approved installer under the necessary conditions of Planning and/ or Building Regulations Approval. The approach will also serve to minimise impact on ecological interests at the site.

- **WSCC Highways-** *The response of 29.8.19 does not specifically object but seeks changes before the application can be approved. It also recommends conditions. Issues relate to turning heads, car parking, drives and safety audit.*

Applicant Response:

Updated tracking information, reflecting changes to the layout, is now attached.

To address concerns relative to the turning head adjacent to plot 65 possibly being used for parking, it can be noted from the revised layout that bollards and grasscrete have been introduced. Therefore, restricting use to SuDs maintenance access only.

Plots 81 and 82 will be serviced from the south of the bollards, with the refuse vehicle reversing on the southern section of the emergency access. A bin collection point will be located in the vicinity of plots 81 and 82.

Relative to comments on the length of driveways, it is confirmed that the layout has been reviewed to ensure that driveway lengths are no longer than 2 ¼ spaces so that vehicles do not overhang the footway/ carriageway.

A revision to the site layout has been undertaken, which updates the alignment of the access road and the location of the visitor parking bays to provide good forward visibility. This addresses comments relative to plots 24 to 29.



Based on the new WSCC standards resident parking (August 2019) demand for the site will be 195 spaces (explained as follows):

Number of Bedrooms	Number of Habitable Rooms	Parking Behaviour Zone 2	Number of Dwellings	Expected Parking demand	Visitor	
1	1 to 3	1.4	0	0	0.2 spaces per dwelling	
2	4	1.7	44	74.8		
3	5 to 6	2.1	38	79.8		
4+	7 or more	2.7	8	21.6		
			90	177	18	195

Although the site provides 18 (9%) spaces above the new WSCC expected parking demand, the standards acknowledge that *'To accommodate potential variations in parking demand within a single ward, consideration may be given to varying the expected parking demand by 10% above or below'*.

Implementation of parking restrictions along the eastern end of Summer Lane has already raised concerns from some existing residents and the additional 18 spaces will ensure that there is sufficient provision onsite to avoid the overspill of parking onto Summer Lane.

Issues relative to vehicle charging points have been discussed above.

Relative to the remaining technical matters raised, regard should be had to the attached Local Road Assessment and Designers Response to RSA.

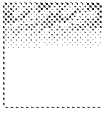
- **ADC Drainage-** *Raises concerns relative to suitability of 'numerous accessways over watercourse', lack of clarity re intentions for watercourse to NW of site, lack of clarity re possible increased flows to water course, questioning whether the basins will be lined, surface water drainage scheme conflicts with the proposed ecological mitigation for water voles.*

Applicant Response:

In response to concerns raised relative to culverts, the arrangement of accesses to properties fronting Summer Lane has been reviewed and rationalised from 10 to 4 crossings. The revised approach is now reflected in the update layout plans as attached.

It is confirmed that a survey of the downstream ditch system has been carried out and a hydrological assessment is under way. This will be submitted to ADC under sperate cover. The assessment is required to prove that the proposed diversion does not cause flooding of the existing watercourse.

The current proposed base level of the attenuation basins has been set at the maximum recorded groundwater levels, as obtained from the winter groundwater monitoring 2018/ 2019, thus the basins are not proposed to be lined as they will not be susceptible to ground.



- **Pagham Parish Council-** *Raises a range of questions relative to need for hard surfaced paths in POS, need for dog proof boundaries in POS, need for street furniture and lighting in POS, POS cannot link to Village Hall, need to make provision for link to Crayfern site as previously agreed, concern about relationship of some plots (34 to 37) with existing dwellings, inadequate visibility at Summer Lane/ Pagham Road junction, inability of vehicles to pass on Summer Lane due to reduced width, like to see some hipped roofs in street scene L-L, concern re safety of attenuation pond, bin store should not be at the front of properties, additional bin storage needed for affordable rent units and would like use of appropriate bricks.*

Applicant Response:

Public Open Space: - In response to comments on the need for hard surfaced paths, it can be noted from updated dwg m323-350Rev P5 that we are now proposing bound gravel footpaths and seating areas. It can also be seen that the revised POS details illustrate provision of a post and rail fence around the perimeter of the area, with wire mesh at the bottom, which will prevent dogs escaping. The POS information also details the positioning of street furniture and lighting (also refer to drawing 100090.POS.1301.PO1), although the detail will be finalised via discharge of an appropriate planning condition/s.

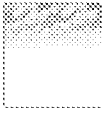
Relative to access, the primary route is via Summer Lane. The RMA details originally showed a secondary access via the Village Hall car park, as was highlighted at outline stage. Given Parish Council concerns, however, this secondary link is now only shown as a '*potential link*', should the situation in the future change.

Layout Details: - To assist understanding of the proposed development and its relationship to proximate resident's additional cross-sectional details are provided Dwg number: 1177PD304_Rev_A – Site Sections. These also pick up existing and proposed levels as requested by officers. Comparative levels are also already shown within drainage strategy. Additionally, it is confirmed that all units in section L- L now receive hipped roofs.

The revised layout now shows the possible footpath connection to the Crayfern site in the alignment previously envisaged.

Within the amended layout details plots 34 and 35 have moved further away from the boundary by 5.7metres, so the property is now 16.7m away from the neighbouring dwelling's main external wall (12.7m from the conservatory), in addition to lowering the roof line to incorporate dormers. Additionally, plots 36 and 37 have moved to 2.8m away from the boundary line. This affords a side access width of 1200mm, with a substantial landscape buffer of 1600mm. The landscape buffer will be given independent access and therefore, is to be passed to a management company for maintenance. We believe that there is sufficient existing screening, along with proposed new planting, to provide acceptable levels of privacy. While addressing these specific boundary issues, the architects have also improved the general layout to the north of the site, as detailed within the amended layout plans.

The new layout also serves to reflect the reduced number of crossings of the ditch to the north of Summer Lane.



Highway Issues: - Refer to specific comments from WSCC Highways on points raised which confirm acceptability (see below).

Attenuation ponds: - On the issue of the safety of the approach to the attenuation basin/s a Designer's Risk Assessment has been produced by the Architect and Landscape Architect respectively, with the Engineer's DRA to follow. This will be provided to the Council under separate cover alongside the hydrological assessment. A RoSPA safety report will follow during detailed design.

Bin Storage: - Following our meeting of 23.9.19 it was not considered that there was a need to amend the details relative to bin storage from that shown within the initial RMA submission.

Design: - Following our meeting of 23.9.19 it was not considered that there was a need to make substantive design changes from what was shown within the current RMA details.

- **WSCC Highways-** *The response of 17.9.19 reflected on the Parish Council highway comments. It highlights that visibility at Summer Lane/ Pagham junction will comply with the appropriate design guidance, an additional crossing of Summer Lane was not identified as necessary as a consequence of the proposed development and the narrow section of Summer Lane is over a very short distance and forward visibility is good, the Summer Lane works were approved through the outline consent.*

Applicant Response:

Noted. Considered that this fully addresses the Parish Council comments on highway issues.

- **ADC Landscape-** General Response seeking clarification of the extent of the Landscape Management and Maintenance document as well as maintenance responsibilities.

Applicant Response:

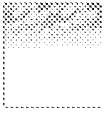
An updated copy of the Maintenance document is attached which makes it clear that *'the areas north of Summer Lane will be maintained by the developer management company, and the Public Open Space south of Summer Lane will be passed into Arun District Council ownership, with the intention of being given to the local Parish Council as per the S106 agreement'*.

- **ADC Landscape-** *Response issued relative to Parish Council comments. Supports provision of paths that are fit for purpose, park furniture, boundary fencing and planting. It is noted that conditions 20 and 21 support the design layout requirements.*

Applicant Response:

Comments are noted. The updated layout information serves to effectively respond to the comments made.

- **ADC TREE OFFICER-** *Objected to application and highlighted need to retain TO3 and 5. Revised layout to be supported by an Arboricultural Method Statement Report. Recommending TPO for TO3 and 5.*



Applicant Response:

Concerns are noted and the layout plan has been amended accordingly to retain the two trees of interest. In this regard, reference should also be made to the Arboricultural Method Statement and Tree Protection Plan as attached.

To support the above the following documents/ information are enclosed with this letter:

- 1177 PD100_Rev_P10 - **SITE PLAN**
- 1177PD304_Rev_A - **SITE SECTIONS**
- 1177 - Summer Lane Pagham - **Materials Schedule** 13-11-19
- Pagham Accommodation Schedule – 20Nov19
- 1177PD118_Rev_D - **HOUSE TYPE - C** [2 Semi Detached V3]
- 1177PD117_Rev_D - **HOUSE TYPE - C** [2 Semi Detached V2]
- 1177PD116_Rev_E - **HOUSE TYPE - C** [2 Semi Detached V1]
- 1177PD115_Rev_D - **HOUSE TYPE - C** [3 House Terrace V2]
- 1177PD114_Rev_D - **HOUSE TYPE - C** [3 House Terrace V1]
- 1177PD112_Rev_D - **HOUSE TYPE - B**
- 1177PD110_Rev_E - **HOUSE TYPE - A**
- 1177PD121_Rev_D - **HOUSE TYPE - F**
- 1177PD302_Rev_C - **STREET SCENES G, H, J**
- 1177PD301_Rev_D - **STREET SCENES D, E, F**
- 1177PD300_Rev_E - **STREET SCENES A, B, C**
- 1177PD303_Rev_C - **STREET SCENES K, L, M, N**
- 1177 Summer Lane Pagham - **DRA - Planning Rev B** - 13.11.19
- 039.5017.701 Rev E **Proposed New Road Layout**
- 17492 - **Designers Response to Stage 1 RSA**
- 17495 - **Local Road Assessment**



- **Drainage Strategy and SuDS Statement-19-11-13 (parts 1 to 3)**
- **DSM-E4761-007G - Level Strategy**
- **DSM-E4761-002G - Refuse Vehicle Swept Paths Analysis**
- **DSM-E4761-003G - Fire Tender Swept Path Analysis**
- **DSM-E4761-004G - Highway Layout Review**
- **039.0017.001 Rev D Fire Tender and Driveway Tracking - Updated Layout**
- **039.0017.003 Rev B Pumping Station Tanker Tracking - Updated Layout**
- **039.0017.002 Rev D Western Access Refuse Tracking - Updated Layout**
- **m323 Summer Lane Landscape Management and Maintenance Specification RevP2**
- **m323-350revP5 Landscape Plan**
- **m323-301 to 308 Landscaping**
- **100090.POS.001.A - LIGHTING REPORT**
- **100046.PRIV.1400.P02 - LIGHTING SCHEDULE**
- **100046.PRIV.1300.P04 - PROPOSED LIGHTING LAYOUT**
- **100046.PRIV.003.B - AREA LIGHTING CALCULATION**
- **100090.POS.1301.P01 - LIGHTING LAYOUT POS**
- **Ecology Mitigation Strategy FINAL2**
- **MW.19.0612.Arb Impact Assess and Method Statement**

As recently agreed, it is confirmed that under separate cover we will also be providing:

- A **Hydrological Report** to provide an assessment of both the existing baseline and proposed hydrology of the downstream receiving watercourse with the impact of receiving the divert flows away from the mobile home park. This assessment is being produced in compliance with the approved Flood Risk Assessment which proposed a final point of discharge to the south western part of the site, as per the current proposals.
- A **Designer's Risk Assessment** is being produced by the Civil Engineer relative to the safety of the approach to the attenuation basin/s. It is reiterated that a RoSPA safety report will follow during detailed design.



It is understood that given the technical nature of these documents it will only be of relevance to your drainage colleagues and not in itself necessitate wider consultation. Accordingly, the slight delay in getting this detail to you should not serve to impact on determination of the RMA.

It is hoped that the above response and additional supporting information will be sufficient for ADC to reconsult as appropriate in order to progress the RMA to a positive determination under officer delegated authority.

Public Comment:

From our review of the public consultation comments submitted it appears that a total of 5 written submissions have been made raising a number of concerns. In this regard, the applicant would respond to the main points as follows:

Objection:	Applicant Response:
<i>Severe noise from 180+ cars close to back garden</i>	It is noted that the level of development has already been established through approval of outline planning permission P/58/15/OUT, as well as location of the access points into the site (access was unreserved).
<i>Over development</i>	The level of development has already been established through approval of outline planning permission P/58/15/OUT.
<i>Loss of wildlife</i>	The principle of development of the site, and its broad layout, has already been established through approval of outline planning permission P/58/15/OUT. Condition 8 of the Outline Planning Permission is addressed through the provision of an ecological mitigation strategy (see Aluco Ecology 2019: Ecological Mitigation Strategy). This details mitigation method statements for protected species recorded on site and in the zone of influence during survey work (such as birds, bats, water vole, fox, reptiles) so that construction is undertaken using a best practice methodology. As well as during the site construction, ecology enhancements and habitat creation is proposed for the long-term site operation. This is through incorporation of biodiversity features and habitats in new public open spaces, both within the main development area and south of the site in a large area of dedicated public open space (such as native species hedges, wild flower grasslands tall grasslands for specific wildlife recorded locally, and incorporation of habitats in SUDS on site), and recommendations for ongoing management of the new and existing habitats on the site. These are set out in the Landscape Masterplan and Management Schedule (IJLA, 2019). In addition, the new development will see bird and bat boxes incorporated as part



	of a number of new dwellings. The lighting strategy for the development has also had regard to potential impacts on nocturnal wildlife, providing corridors for wildlife through the site.
<i>Traffic jam on Pagham Road</i>	Development of site, level of development and access solution has already been agreed through approval of the outline planning permission.
<i>Accuracy of highway plans</i>	The applicant's highways advisor has reviewed the highlighted information and is content that the detail is correct. The highway plans agreed at outline stage are available to view on the Council's web site.
<i>Width of Summer Lane</i>	It is noted that only a small length of Summer Lane is less than 4.8m for which double yellow lines were agreed as part of the S278 (outline permission) to prevent problems developing. The County Council has commented on, and confirmed acceptability of the situation, in responding to the Parish Council submission.
<i>Safety of road crossing</i>	It is highlighted that a Stage 1 Road Safety Audit was submitted alongside the application. A Designer's Response to accompany the audit is attached here.
<i>Loss of parking for existing residents</i>	The TRO for double yellow lines is not the full length of the Summer Lane and the implementation of the parking restrictions was agreed by WSCC at outline permission.
<i>Lane is not adequate to cater for 180 additional vehicles</i>	Suitability of Summer Lane to accommodate likely level of traffic fully considered at outline stage and following technical review was deemed acceptable, hence the issuing of outline planning permission P/58/15/OUT.
<i>Insufficient capacity at water treatment works at Pagham</i>	Under OFWAT's New Charging Arrangement brought into effect in April 2018, Southern Water have an obligation to carry out any required off-site reinforcement works to accommodate foul discharge from the new development. Southern Water have previously confirmed sufficient capacity at the Pagham Wastewater Treatment Works located north west of the site.
<i>High water table, increased risk of flooding</i>	Winter groundwater monitoring has been carried out over the winter of 2018/ 2019. This has been carried out to determine the peak seasonal groundwater level. The proposed site levels and surface water attenuation features have been designed to mitigate the proposed development against to the risk of ground water flooding.



<i>Local councillors are being prevented from voting on projects of relevance</i>	Comment is noted, although this is not considered of direct relevance to this RMA
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In addition to reflecting on consultation comments, we also attach herewith a **National Design Guide Checklist 2019**, which details how the proposed design approach is in line with the recently adopted National Design Guide.

We hope that the above/ attached is acceptable and that the application can now be formally determined. This said, should you have any queries or require anything further please feel free to contact me.

Yours sincerely

Adrian Barker
Director- Planning

C.C Mr Daniel O'Shea, Drew Smith

Enc.