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From: [redacted]
Sent: 20 January 2022 10:21
To: Planning <Planning@arun.gov.uk>
Cc: [redacted]
Subject: Planning Application R/291/21/PL

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Dear Sir/Madam

I wish to object to the planning application R/291/21/PL relating to 12 Broadmark Lane for the following reasons:

1. **Incompatibility with existing urban grain - recent local planning projects demonstrate a blending with existing surrounding properties**
2. **Inadequate consultation and engagement with local community/stakeholders and lack of an appropriate Design and Access Statement**
3. **Scale, size and design of the development will impact on privacy of local properties, notably to the rear of the building where rooms, balconies and roof gardens overlook properties. The flat roof design with cause shadowing to existing properties. Boundaries are unclear and it is unclear as to compliance with local planning guides.**
4. **Provision for parking and safe access and egress from the proposed property is thought inadequate and unsafe despite the support by WSCC.**

Further details on these issues are below:

Existing Urban Grain

Broadmark Lane is a very busy no through road connecting Rustington Town Centre to the Seafront. It does not permit two cars to pass due to parking on both sides of the road. The western side of the road is dominated by properties constructed during the inter-war period as part of the private Cudlow estate, the majority of which show design cues from earlier architectural periods. The subject property is a case in point as the character, shape and form could easily be from the mid-Victorian era. The earlier properties are predominately constructed from red bricks with gable returns and dormer windows along with clay roof tiles. Extra adornment is provided by tile hung walls or rendered walls with exposed timbers. The roof angles are mostly relatively steep at 45 degrees which contributes to the overall vertical accent of the properties. On the opposite (eastern) side of the road, there are a number of infill plots of bungalows and chalet bungalows from the 1960's which replicate the design cues of the earlier buildings. The streetscape shows a number of differing but compatible building forms that have no predominate hierarchy which blend well.

Previous Planning Applications

The subject site has been subject to a number of historic planning applications, some of which were granted. An extension to the hotel was constructed in approx. 1973 to provide two separate flats. The design of the extension shows a sympathetic use of compatible materials. More recently, the vacant plot adjacent to number 5 Broadmark Avenue was developed to form a new dwelling. Planning consent ensured a compatibility of design and materials used. Likewise, redevelopment of nos 4 and 6 Broadmark Avenue was dependent upon maintaining the scale, alignment, building pattern and character of the adjacent buildings.

Design and Access Statement

The Arun District Design Guide states that applications of 10+ new dwellings require a design and access statement to be produced. This has not been provided, nor has any consultation been undertaken with neighbours affected by the proposed scheme. The application in its' current form should be withdrawn until a validated full design and access statement is submitted.

Layout, Scale and Massing

The proposal is to replace the existing Manor Hotel and two separate flats on the northern part of the site with an "Art Deco" style 3 storey block containing 10 flats which is an overbearing imposition of a horizontally accented building on a matured streetscape.
The north – south orientation of the site provides a number of challenges to provide sufficient light to habitable rooms on the south and western facades of the building which overlook existing properties at 14 Broadmark Lane and 1 & 3 Broadmark Avenue. The proposed design allows for balconies to provide amenity space for the flats to the rear (west) of the building. These appear to overlook other neighbouring properties to an unacceptable degree and should be redesigned. Whilst the footprint of the proposal is not significantly greater than the existing building, it is of a flat roofed construction which will cast a significant shadow onto properties to the west of the site. The existing building has a steep pitched roof which minimises any shadow. An architect drawing should be produced which shows the shadow cast by the proposed building at mid-summer and mid-winter before the application can proceed any further. The design guide issued by Arun District Council states that the rear face of the building should be 10.5m from the boundary with 21m between rear faces of the building to the rear. The habitable rooms of the proposed building should be 14m from the flat wall of an adjacent neighbouring property. The architects should provide drawings to show that the proposal meets these requirements before proceeding any further. The guide also states the minimum vertical and horizontal separations from adjacent buildings using a 25 degree and 45 degree rule. (25 degrees from the mid height of the lowest window of the applicant property to roof of adjacent property at 1 Broadmark Avenue and 45 degrees from the mid point of the window closest to the boundary in both the vertical and horizontal planes to the next door property at 14 Broadmark Lane.) An architects drawing should be provided that shows the proposal meets both these requirements before the application proceeds any further.

Although there are requirements to maintain employment, the application includes agent details for the sale of the property without any relevant commentary. Unlike other Local Authority areas, there is no requirement in Arun for sequential testing. There should be provision that ensures that commercial buildings have to prove a non viability of commercial uses before consideration is given to alternative uses of the existing building. A conversion of the existing building into flats or sub division into separate houses is viable and will not alter the existing streetscape. A full investigation and viability assessment should be undertaken to determine if the existing building is incapable of further alteration. Given that Arun District has an aged population with a greater percentage of over 65's than the national average, it is noted that the application makes no mention of lifetime homes or accessible homes. The application should define the accessibility of the common areas and movement within the flats. Matters such as a stretcher can be accommodated within the lift and will it fit in the corridors should be an important design consideration in a new build flat. Likewise, provision should be made for mobility scooter storage and charging within the building.

The plans appear to show an ill defined boundary to the north. The existing fence line should be maintained and details of the new boundary treatment provided. The provision of "landscape planting" on the footpath of Broadmark Avenue is on land not within the ownership of Rustington Manor Hotel and for which no consent has been granted. The layout plans should be redrawn.

The proposal suggests that a prominent building can be applicable to a corner site. I believe that this assertion is incorrect as the design guide refers to "prominent corner sites". The junction of Broadmark Lane and Broadmark Avenue is not a prominent corner site.

Comparison Property
The depiction of Manor Road Garage in East Preston as a comparator property to justify the application is totally inappropriate and misleading. The garage was a commercial building constructed in the 1930's and converted to residential use approximately 10 years ago. Unlike the proposed 3 storey building at Manor Hotel, the garage is a part 2 storey building with one room to the front on the second storey and the remainder of the second storey set back behind a balcony

with a balustrade wall. Reference to the Manor Road Garage should be disregarded. Whilst some original Art Deco properties can be found in the surrounding urban area, the majority of Art Deco style flats overlook the sea and were not necessarily constructed contemporaneously to the design period. With the exception of the recent redevelopment of Princess Marina House overlooking the sea, there are no other Art Deco styled properties on Broadmark Lane which means that the design proposal does not respond to the building heights, scale and massing that characterises the existing street frontage.

Parking Provision and Layout

The Arun District Council Parking Standards Supplementary Planning Document (Jan 2020) sets out the parking requirements for new build properties. The figures quoted in the planning application are completely incorrect and should be recalculated correctly. A new layout plan should be resubmitted showing how the required number of spaces can be accommodated within the site along with dimensions of each space. The correct provision is 1 space for each 2 bed flat and 2 spaces for each 3 bed flat. (total required equals 16 spaces). Visitor parking provision is calculated at 20% of main provision (3.2 spaces equal 3 spaces). Electric Vehicle charging should be available on an increasing basis. By 2023, provision must be made for charging to be available on 30% of parking spaces. The guidance documents also propose that vehicles should be able to turn around on the site. The layout plans do not provide for this. The current frontage includes sections of fencing with hedges. The proposal removes this fencing with all parking spaces accessed direct from the road. This will result in the loss of some on street parking and a long section of dropped kerbs. Vehicles could then be backing out into the road which is dangerous. A planning guidance document should be organic and dynamic to reflect changes in the needs of the population. The recent lock downs have clearly shown that there have been an increased level of home delivery, (parcels, groceries, medications etc) a lifestyle choice that is set to continue. Provision should be made within the site layout for an “in and out” access and egress for light commercial delivery vehicles.

Conclusion

The application as drafted details a development of a totally inappropriate style, scale and proportion compared to the surrounding properties that fails to address a number of basic requirements as defined in the Arun Design Guide.

The application should therefore be refused.

Yours sincerely

Sue Bush

PineTree Cottage
3 Broadmark Avenue
Rustington
West Sussex
BN16 2HQ

Contact details