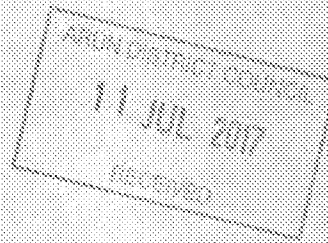


Mr D Easton
Case Officer
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF



"Brockburn"
Hurst Rd
East Preston
West Sussex
BN16 3AP

Application Ref: R/64/17/PL

10 July 2017

Re: Objection to St Mary's Close amended development proposal

Dear Mr Easton,

We have looked in detail at the new plans for the development of the St Mary's Close site. Whilst the removal of the 2 garage blocks from the front of the development does address one of our criticisms it does not address our main objections i.e. the density, the similarity of the house design when compared to the current street scene and the lack of usable parking spaces.

The main change made by the developer is to remove the 2 garage blocks which were sited in front of the building line. To retain garages for the 2 houses concerned, the plot 4 house design has been changed to include an integral garage and the garage block for Plot 1 has been moved behind the house.

1. The effects of these changes are:

- Because the house on plot 4 is now wider, the siting of 3 of the 4 houses has been altered to accommodate the increased width. The effect of this is that the house on plot 4 is now closer to the boundary with Knowle and the houses on plots 1 and 2 are even closer together than they were before. This adds to the massing effect of the whole site.
- The design of the house on plot 4 has changed from a so called 'chalet' design to what is basically a mirrored design of the houses on plots 2 and 3. This make the house design on the whole site look even more homogenous and even less in character with the rest of Hurst Road. The change from a 'chalet' to a 'normal' design on plot 4 now presents a vertical edifice to the residents of Knowle and brings this 'wall' even closer to their boundary, with the loss of light and privacy this will entail.
- Moving the plot 1 garage block behind the house is completely out of character with the rest of the road and even out of character with the developer's own design. It effectively reduces the distance between the house on plot 1 and L'Abri and the distance to the houses on the southern boundary. This not only adds to the overcrowded appearance of the site but the structure may cause an unacceptable loss of light to L'Abri as it is well within a 45 degree line of site from the rear windows of the house.
- The number of so called parking spaces in the new proposal has reduced from 15 to 13. We say 'so called' as 6 of the 13 spaces are 'tandem spaces' and will, in reality, be under-utilised. There are now 2 houses where 3 parking spaces are stacked, one behind the other. This represents an even smaller allocation of parking for the site.

For all the reasons above we believe that the amended plans make the density, street scene, amenity and parking issues even worse than the original plans. We believe that the whole site is so crowded that to accommodate moving the 2 garage blocks the developer has had to compromise on his own original decision to gain favour i.e. by making the space between buildings seem as wide as possible. And the fact that he has now randomly 'chucked' the plot 1 garage block to the back of the house only emphasises the lack of space on this site for 4 large houses with garages.

More detailed discussion about our objections to the amended plans can be found below.

2. Overbearing impact on neighbouring houses and the whole road:

- The proposed development will have a density of 17.4 dwellings per hectare. The average density of all the other plots in the road is 10.5 dwellings per hectare. The proposed development will be nearly double the average density for the rest of the road.
- The average frontage for the proposed development will be 12.7 meters. The frontage of all the other plots in the road is on average 18.5 meters. So the plot width of each of the 4 houses in the proposal will on average be 1/3 narrower than the average for the rest of the road.
- Taking the measurements from the developer's street scene drawing (SS-01)⁽¹⁾ the distance between the eaves of the 4 houses was, on average, approximately 1.6 meters. It is not possible to measure these distances accurately on the new drawing (SS-02) but the average distance between eaves is now less than 1.6 meters. For the rest of the road the average distance between eaves is roughly 4.8 meters. This means the houses in the proposed development will be 3.2 meters closer together than the average for the rest of the road. From a distance, or a side long view, the new houses will look like they are almost touching each other and will be indistinguishable from a row of terraced houses.

The **Local Plan - D SP1 Design** stipulates in various sections that all development proposals must consider density, scale and massing. Paragraph 13.2.11 states proposals should consider "The combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces i.e. its massing". And Paragraph 13.2.12 states "For development to be successfully integrated within the existing environment, scale is an important design element". And ".....the scale of new development should.....ensure the height and massing does not interrupt or debase the rhythm of an existing building/roof line and overall streetscape, or detract from the local and wider area's character."

The **Local Plan - D DM 1 Aspects of Design** says "Proposals should take into account the density of the site and its surroundings"

And the **Rustington neighbourhood plan. Policy 2 – Housing Design** states that "Development proposals.....will be supported, provided that their scale, density and massing reflects the historic character and scale of the surrounding buildings and landscape"

By any measure the proposed development fails to meet the criteria above. It will look like a cramped mini-estate in the middle of a spacious and generously proportioned road. It will be totally out of character and unsympathetic to the existing street scene.

Just for information, there is a restrictive covenant on St Mary's Close that only allows one dwelling to be built on the plot (in common with all the other houses in Hurst Road).

3. House design and materials:

The proposal is for 4 houses, 2 of one design, one a mirror of the first 2 and 1 of a different design. The developer has obviously recognised that all the rest of the houses in Hurst Road are unique in design and materials. He has made an attempt to reflect this in his proposal by cladding the house frontages with various materials.

But merely cladding the frontages of the proposed houses is not the same as building houses using different materials. In reality the 4 houses, even though they are of 3 different designs, will look very, very similar to each other and they will be in stark contrast to the genuinely unique look of the other houses in the road. This can be clearly seen in the developer's Local Precedent plan (LP-02) which not only shows the variety of houses in Hurst Road but also in nearby roads.

The proposal will therefore contravene several of the planning parameters below (which are a small sample of the statements we could have used):

Arun District Plan 2003 - POLICY GEN 7 The Form of New Development states that "Development will be permitted provided it..... (ii) demonstrates that it responds positively to the identified characteristics and resources of the site."

Local Plan - D SP1 Design states that "All development proposals must consider its setting, materials, finish, architectural details and nearby habitats". Paragraph 13.2.2 says "The successful introduction of new buildings relies on the use of materials and detailing..... ensuring that 'new' buildings are harmonious with their surroundings.

The **Rustington Neighbourhood Plan Policy 2 Housing Design** paragraph 4.12 states that "Development should not detract from the character and amenity of the nearby area"

Section 7 Paragraph 58 of the **National Planning Policy Framework** says that ".....decisions should aim to ensure that developments.....respond to local character and history, and reflect the identity of local surroundings and materials"

Although Hurst Road is geographically within Character Area 7 it is most untypical of that area. The The Rustington Village Design Statement describes Area 7 as "characterised by mainly modern terraced housing with some pockets of social housing and pre-war development". This is clearly not a description of Hurst Road and we submit that Hurst Road has much more in common with Character Area 5, described as "This area is characterised by large detached houses and bungalows many contained in private estates" and "In the larger eastern area the absence of footpaths is a feature, road surfaces are a mix of concrete or tarmac and should be maintained to a high standard. Many of these are privately maintained."

We therefore hope you base your decision on the suitability of the proposal on the actual characteristics of Hurst Road rather than on the generic and misleading description of Character Area 7.

We note that the proposed plan leaves some of the trees and vegetation at the front of plots 2 and 3 which may, depending on how much is retained, partially hide the worst excesses of the proposal. However, this vegetation is not protected and may be removed once the houses are occupied; so it cannot be claimed the vegetation will permanently soften the profile of the development.

4. Parking spaces

The amended Plan SL-02 shows that the developer has allowed 13 parking places in total, two fewer than the original plan. This includes garage and parking spaces. We calculate, using the WSCC parking_demand_calculator, that the parking demand for 4 x 8 room houses on this site is 11 parking places. This includes 3 unallocated spaces, but the site plans indicate that all the places will be allocated. This means that, even if all the places are usable, there will be times when a single household requires additional spaces for residents and visitors but with no unallocated spaces there will be no alternative except on-street parking.

In any event, it is our contention that many of parking places will not be used as only 7 spaces offer unfettered access to Hurst Road. Six of the places, including all the garages, are 'blocked' by other spaces. In the case of plots 1 and 2 there are 3 parking spaces that are 'stacked' one in front of the other; so to release a car from one of these garages the 2 cars parked in front will need to be moved first. To support this objection we quote from a paper entitled "Guidance note; Residential parking" from the Chartered Institution of Highways and Transportation. It says "Tandem parking spaces are often under-utilised by households with two or more cars in regular use" and "Similarly, garages are often used for storage rather than parking..... Where garages are to be provided, additional curtilage and/or on-street parking is likely to be required".

Also, a study conducted by the RAC in 2014 found that "62% of motorists no longer use their garage" and in May 2007 the Communities and Local Government "Residential Car Parking Research" stated "Local planning authorities will need to consider whether to count private garages as car parking spaces given that they are not used for this purpose by a significant proportion of residents" and "This was re-affirmed by the case study questionnaires carried out as part of the research, where less than one third of respondents said that they parked their cars in their garages".

It seems that the WSCC parking_demand_calculator does not take any of this into account.

In summary, the parking demand is for 11 spaces, including 3 unallocated spaces. The developer is providing 13 allocated spaces but 6 of these are stacked leaving only 7 spaces with unfettered access to Hurst Road. Assuming that some of the garages will never be used for car parking the net effect is that there will be insufficient parking available on the site. In our view, based on all the evidence above, if the plans for this development are allowed the planning department will be tacitly condoning the regular parking of cars on Hurst Road, which is a private road.

This matters as the Hurst Road Association has a 'no parking on the road' policy⁽³⁾ which is well observed by all residents. The main consideration for the policy is the safety of the residents of Oakhurst Gardens, many of whom are elderly and some of whom use walking aids and mobility scooters. There are no pedestrian footways in Hurst Road so these residents have no option but to walk on the road itself. Negotiating parked cars would be hazardous for the elderly and infirm and

would also be dangerous for them. It is not a viable option for such people to walk or 'scoot' on the verges, especially in the winter months, as this would be the least safe option.

The road is regularly used by the emergency services due to the demographic of the residents in Oakhurst Gardens. In the past there have been times where on-street parking has caused issues for ambulances trying to access Oakhurst Gardens; and at these times fire engines, often on emergency calls, would not have been able to gain access at all. The picture below, taken opposite the St Mary's plot, emphasises the need to keep the road as a no parking zone:



This picture was taken in 2012, before the "Private Road" signs were put up. A paramedic had to get out to guide the driver through. Luckily, in this case, it was not an emergency. Clearly a fire engine could not have passed.

5. Common ways and verge maintenance

The easterly entrance to the development serves plots 1-3 and becomes a common drive. It seems that the area between the common drive and the verge is also a common area. You can see from the extract from the HRA road policy below ⁽³⁾ that it is resident's responsibility to maintain the verge in Hurst Road. However, because plots 2 and 3 do not seem to extend to the verge it is not clear who will be responsible for verge maintenance in these cases.

6. Community consultation

In the letter that accompanied the developer's initial application (called "Letter Covering – Application & Planning Application" on the planning portal) reference was made to 2 consultation meetings. There were indeed 2 meetings but MJH Homes has completely misrepresented the views of the residents who attended. It is true that Mr Hartnett did take on board a couple of suggestions from the first meeting and made some changes to the plans as a result. However, the overwhelming view of the residents was that we strongly object to 4 houses on such a small plot and that the designs are homogenous, unlike the unique houses in the rest of the road. We did raise parking issues, as the letter says, but this was not the 'main issue'. In fact, at the beginning of the second meeting the HRA Treasurer introduced the meeting by telling Mr Hartnett that the road is unanimously opposed to the proposal on the grounds of density and house design.

7. Alternative solution

We are not NIMBYs and we accept that at some point the St Mary's plot will be developed. At the consultation meetings Mr Hartnett was told, on many occasions, that many residents would accept a 3 plot solution even though this would still represent higher density than the rest of the road.

We would support a 3 plot solution if all the dwellings were of unique design, materials and height. Ideally, as is typical in the rest of the road, each plot would extend down to the verge and have its own entrance. This would create larger plots, enabling all the dwellings to have integral garages, and allow space to create parking spaces that are not in tandem or stacked.

It would also reduce density and the massing effect, create more space between the site and neighbouring properties, especially L'Abri, and be in much closer harmony with the rest of the road.

8. Objection

It is clear that we object as strongly to the amended proposal as we did to the original plans and in many cases our objections are now stronger. If the development is allowed, we will have to seriously consider whether we want to live right opposite it in the future.

We sincerely hope, for all the reasons given above, and the fact that affected residents have no right of appeal, unlike the developer, that the application will be refused.

Yours sincerely



Mark & Marion Gilbert

See Appendix and notes below

(1) The developer's drawing SS-01 is inconsistent with other drawings he has submitted in terms of measurement. It seems this, and the use of light shading on the left hand side of houses, is an attempt to exaggerate the distances between the 4 houses and make his proposal more appealing.

(2) <https://www.rac.co.uk/press-centre/press-releases/is-this-the-end-of-the-road-for-the-domestic-garag?feed=Press-Releases>

(3) Extract from the Hurst Road Association Road Policy:

- Vehicles owned by permanent residents, including all permanent members of households, should not park in the road at all, except in an emergency
- Visitors, guests and tradesmen should be encouraged to park in driveways if it is at all possible and convenient to do so
- If it is absolutely necessary for visitors etc to park in the road, residents should encourage drivers:
 - not to park any part of their vehicle on the grass verges AND
 - not to obstruct any other driveway such that neighbour's vehicles cannot be driven in or reversed out in an easy and safe manner. This would include parking opposite any driveways.
- Residents are responsible for maintaining i.e. mowing, that part of the common grass verge which lies directly between their plot and the road itself.
- If a resident cannot, for reasons of illness or infirmity, maintain the grass verge other residents of the road will undertake to maintain the verge on their behalf