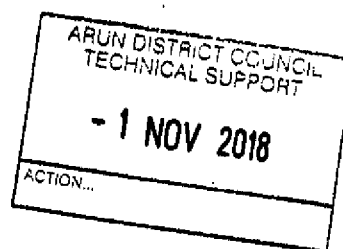


Park Drive Resident's Association



2 Park Drive
Rustington
West Sussex
BN16 3DZ

Group Head of Planning
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

29 October 2018

Dear Sir

**Ref: Planning Application R/90/18/HH
at no: 9 Park Drive, Rustington**

My Committee has instructed me to write to you to express its disappointment and concern about the Council's approval of the recent planning application for an extension to no: 9 park Drive.

Despite a protracted process of consultation throughout which residents from both Park Drive and Herne Court as well as St Anthony's Way maintained their opposition to the proposals, together with the Parish Council, the planning authority appears to have made a surprisingly rapid decision via delegation to its officers and without providing an opportunity for objectors to make their views known at a meeting of the Planning Committee.

In particular the Association is concerned that

- (i) The criteria against which the proposal was to be and should have been judged as set out in the Pre Application Advice letter to the applicant from the Council's planning officer, Andrew Wood, (Ref: PAA/38/18, dated 11 April 2018), under the signature of Neil Crowther, Group Head of Planning, do not appear to have been applied in a reasonable and consistent manner to the application ultimately received and considered by the case officer, Zachary Denton on behalf of the Group Head of Planning.
- (ii) There is no condition attached to the permission which ensures the submission of a Construction Management Plan by the applicant and its approval by the Council.
- (iii) There is no condition attached to the permission requiring the applicant to identify the name and contact details of the proposed Site Manager (typically included in [iii] above).

In relation to item (i) above

The Recommendation Report (Design and Visual Amenity – second paragraph) accepts that as a result of its scale the proposed extension would not be considered to be subservient to the host dwelling. Yet bizarrely the following sentence claims that *'it is not considered to have a significantly detrimental impact on the established character of the host dwelling as a result of its*

design, scale and use of materials' which directly conflicts with the conclusion of lack of subservience.

Further the next sentence claims that *'Resultantly it would be visually integrated with the existing dwelling and would result in a sympathetic addition to the dwelling, in terms of character'*. This is patently not a logical conclusion from the preceding text and the 90° rotation of the principal axis of the house almost categorically defeats the Recommendation Report's proposition that the extension would be a 'sympathetic addition in terms of character' as well as firmly opposing the suggestion that the expansion would be integrated with the existing dwelling. Integration with the host dwelling cannot by definition be achieved if the whole axis of the host dwelling is so dramatically re-orientated.

The Recommendation Report rightly describes the area of Park Drive as being characterised by a mix of properties of differing types and designs, and that none have rooms in the roof. Yet in the same sentence it concludes that the proposal *'is not so significantly different from those in the area that it (the windows in the roof) appears as a prominent and obstructive feature in the locality'*. This conclusion is certainly not a logical one - the only house with three windows in the roof space at both front and back will certainly be prominent and will undoubtedly change the character of Park Drive in a way and to a degree that neighbours and residents do not find acceptable.

Under the heading 'Neighbourhood Residential Amenity' the Recommendation Report dismisses the impact of the proposals on neighbouring dwellings yet the sheer mass of the enlarged building with its three roof windows and longer frontage would certainly have an adverse impact on those living in adjacent properties and nearby properties.

Indeed the conclusion of the Recommendation Report is entirely different from that of the Pre Application Advice letter which stated that:

The proposal is not considered to generally reflect the character of the locality and the host dwelling house and would not be sympathetic with and would unacceptably harm the character of the wider area.

The committee of PDRA recognises that some changes have been made to the original proposal but apart from the removal of the balcony these amount to little more than mere tweaks that have done virtually nothing to allay the reasonable concerns of neighbours that this would be simply too big, too different and too insensitive an extension. Indeed it is hardly an extension at all but more a rebuild to a larger scale.

In relation to Item (ii) above

The Association is surprised and very disappointed that the permission does not include a Construction Management Plan. Such a Plan is a normal requirement for developments of a significant size whether new build or extensions and its omission leaves a project with considerable complexity of operation without any control of onsite management, working hours of operatives, loading/unloading and storage of plant and materials, disposal of waste and emissions of dirt and dust and the access to the site and the parking of site operatives' vehicles.

The absence of a Construction Management Plan leads us to wonder whether the Council has made a realistic assessment of the nature and scale of works which will be involved and whether the case officer has even visited the application site. To its dismay the Association is regrettably obliged to conclude that neither can have been carried out.

Yet this omission on a site within a private road which relieves the Council of a good deal of the responsibility for oversight of the logistics of the proposed build is a dereliction of its duty and

passes the task of policing the applicant's compliance with what are normal planning conditions to the Association which does not have the authority to perform such a role.

The Council's omission is all the surprising since barely two years ago such a Plan was included as a condition on the approval on appeal of the new build at 10A park Drive at the insistence of the Association. Why have lessons not been learned?

All the requirements for such a Plan were set out in the Council's letter to the applicant for the development of no:10A under reference R/247/16/DOC dated 18 October 2016. The Association therefore requests an explanation from the Council as to why such a Condition was not attached to the permission granted to no:9.

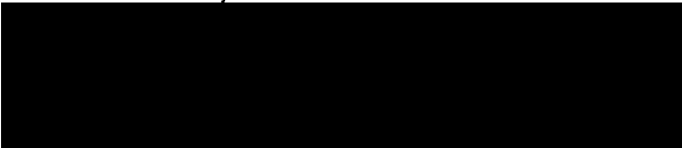
The Association requests an explanation from the Council as to how it concludes that such a large development involving extensive additional external walling and foundations, the complete removal of the existing roof and its replacement by a totally new and different structure, the removal of the existing staircase and the installation of a new structure in a different position could be allowed without the conventional management plans being required as a condition to the approval.

The Association also requests an explanation from the Council as to how it can justify its decision to permit the application when it had so firmly rejected the pre-application proposals which were modified so little and how this conclusion could be reached in the interests of safeguarding the amenities of the occupiers of adjoining and neighbouring properties.

The Association also requests an explanation of how this application could be permitted in the face of 29 letters of objection from neighbours on all sides as well as the Parish Council.

The Association looks forward to hearing from you at your earliest convenience.

Yours faithfully


Secretary

Park Drive Resident's Association