

Comments on the Planning Proposal APP/24/00987 | Demolition of existing dwelling and the construction of 5 new dwellings with associated external works and landscaping. | Oklahoma, 4 Long Copse Lane, Emsworth, PO10 7UL

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Executive summary

This document and appendices set out objections to the above proposal with reference to the available applicants' submissions and local planning guidance. The proposal is a backland development without justification or merit which will result in a change in character of the immediate area. There will be negative impact to neighbouring properties which includes a complete and unequivocal obstruction of light, noise and smell disturbance, loss of privacy and outlook and destruction of cumulative garden area. The proposed properties will change the layout and form vs. immediate neighbours. There is a removal of green core which is replaced with unattractive parking and turning area. The lower area properties dominating and crowding neighbouring properties and their gardens. The proposal has inadequate and unrealistic parking provision. Analysis of traffic movements and access are based on these inadequate spaces. The proposal fails to provide assurance of the adequacy, safety and essential accessibility of the access road and turning area. There is no plan for safety and maintenance of the shared rear parking area. The proposal fails to meet the explicit requirements for Services and Waste. The proposal contributes a net increase in surface water run-off which is planned to contribute to the already overburdened sewerage system and contribute to discharges of sewerage into Chichester Harbour.

1. Key Objections (based on local and national guidelines or policies)

A. Backland development

There is no justification for this backland development (*HBC Design Guide SPD 5.25*)

The proposal acknowledges that the development leads to a change of character of the area and the backland proposal fails to reflect the local character. (*HBC Design Guide SPD 4.47*)

The development will destroy a combined, secure and tranquil area of cumulative rear gardens which currently define this area. (*figure 5.8 on pg. 43 of HBC Design guide*)

The backland development has a negative effect on all neighbouring properties (see below).

The backland development removes a green core and replaces this with a cramped and inadequate (see below) parking area leading to noise, light and emissions pollution.

The new access roadway in combination with an additional property (+1 vs. current) to the front of the site leads to a change in the layout and form of the area and does not follow the width of plot of immediate neighbours. (*HBC Design Guide SPD 4.48, Table 4.1*)

The scale of the properties on Plot 3-5 is larger than directly neighbouring buildings and will dominate and crowd adjacent gardens and properties. (*HBC Design Guide SPD 5.26, 5.27*)

The lower area of the development (unlike the neighbours to the East), does not allow engagement with the street or public realm (*HBC Design Guide SPD 5.03*)

B. Impact on neighbouring properties (Policy CS16 (1e))

To the East

Access road is close to the minimum separation distance of 3 metres to the habitable rooms of the Eastern neighbour. No mitigation for noise, light or fume pollution has been proposed. (*HBC Design Guide SPD 5.31*)

Properties on Plot 3-5 will overshadow and dominate the smaller buildings of Wraysbury Park Drive (*HBC Design Guide SPD 5.26*) and obscure afternoon and early evening sunlight from the rear gardens of those properties. (*HBC Design Guide SPD 5.10*)

To the West

Property on Plot 2 will completely obscure an existing picture window of neighbouring property (with a new brick wall of 2 storey at a distance of approx. 2-2.3 metres), thereby removing ambient light, and any early morning sunlight from neighbouring property. (*HBC Design Guide SPD 5.07, 5.08*)

There will be a complete lack of privacy due to overlooking between and from the new properties, particularly property 2 and the rear raised patio area of the neighbouring property. No mitigation is proposed. (*HBC Design Guide SPD 5.06*)

The tall rooflines of Properties on Plot 3-5 and Car Barn are out of keeping with the area (*HBC Design Guide SPD 4.48, Table 4.1*) and will be an obstruction of low winter sunlight and lead to a reduction of solar gain for the neighbouring property and reduction of light to its garden. (*HBC Design Guide SPD 5.10*)

The parking and turning area will create noise, light and fume pollution for the gardens of the neighbouring property with no mitigation provided. (*Policy CS16 (1e)*)

To the South

The lower area properties have (at most) the minimum separation distance from the Southerly boundary and will look directly into the property at the South of the site.

C. Parking and turning area

Inadequate parking provision for proposed properties and visitors – only 12 proposed vs. 13 required. (*Havant Borough Council Parking SPD, DM13 of the Havant Borough Local Plan (Core Strategy) 2011*)

Impractical parking provision with blocked and inaccessible spaces (*English Partnerships – Car Parking, What Works Where*)

Vehicles of Property 1 and 2 will have to reverse into access road of main highway due to lack of any turning space.

Narrow access roadway to lower area of site with pinch point of 4.1 metres

Layout will require excess manoeuvring at front and rear of site – this will be exacerbated by any parking outside designated areas, which would void the analyses provided regarding access e.g for Emergency Vehicles.

High likelihood of dangerous obstruction to main highway by visiting delivery vehicles etc. due to suboptimal provision of parking spaces. (*DM13 of the Havant Borough Local Plan (Core Strategy) 2011, English Partnerships – Car Parking, What Works Where*)

Layout of parking and access road is not safe and does not encourage pedestrian and cycle access. (*HBC Design Guide SPD 5.18*)

Garage (and Car Barn) situated ahead of building line (*HBC Design Guide SPD 5.21 and 4.48-Table 4.1*)

Inadequate bordering of the Rear Parking Boundary for neighbouring property will not limit impact of noise and disturbance (*HBC Design Guide SPD 5.22*)

Layout of rear parking area provides increase in opportunity for crime and access to neighbouring gardens (*HBC Design Guide SPD 4.29*)

The required lighting for the lower properties and parking area (*HBC Design Guide SPD 5.22*) will lead to adverse light disturbance to the bedrooms of neighbouring

properties and their gardens, which are currently completely dark and tranquil.
(section 79 of the Environmental Protection Act 1990)

Maintenance arrangements for shared parking area are unclear (*HBC Design Guide SPD 4.28*)

D. Waste and Services

Bin carry distance exceeds the requirement by 10 metres (and requires an up-slope carry for properties 3-5 when bins are full) (*HBC Design Guide SPD 5.24, HBC Manual for Streets for residents*)

Bin store access for use and cleaning leads to obstruction of main access road and reduction of amenity (*HBC Design Guide SPD 5.32*)

The bin carry route for residents is via the main access roadway.

E. Surface water

There is no indication of genuine consideration of surface water drainage solutions nor plans for foul water drainage. (*HBC Design Guide SPD 4.37*)

There will be a net increase in rainfall runoff into the main sewer, which will exacerbate the local problems of sewage runoff into Chichester Harbour. (*HBC Design Guide SPD 4.37, CS15 and DM10 of the HBC Local Plan (Core Strategy) 2011*)

APPENDICES

Appendix A: Backland Development

1) Failure to maintain or enhance character of the area

The proposed development would consist of 5 dwellings. Two of them would face Long Copse Lane, retaining the established front building line, and the other three would be located within the rear of the site. They would be positioned in such a way that they would align with the dwellings located in Wraysbury Park Drive. However, the proposed dwellings would be larger than these in Wraysbury Park Drive, they would resemble the footprints of the properties located between Long Copse Lane and Hollybank Lane. The density of the proposed development would be higher than to the west but lower than to the east. As such, in terms of urban grain, plot size and garden size, the proposal would create a transition between the two rather contrasting areas.

As evidenced in the snip above, the development documents acknowledge the clear difference of character of the current site and the area to the west vs. the area to the east of the current site (marked in dotted red below). The document above states that the development will change the character of the plot to become a transition area (shaded in red below). This change leads to a negative change in character of the area to the West, whilst also overshadowing the area and properties to the East and cramping the property to the South.

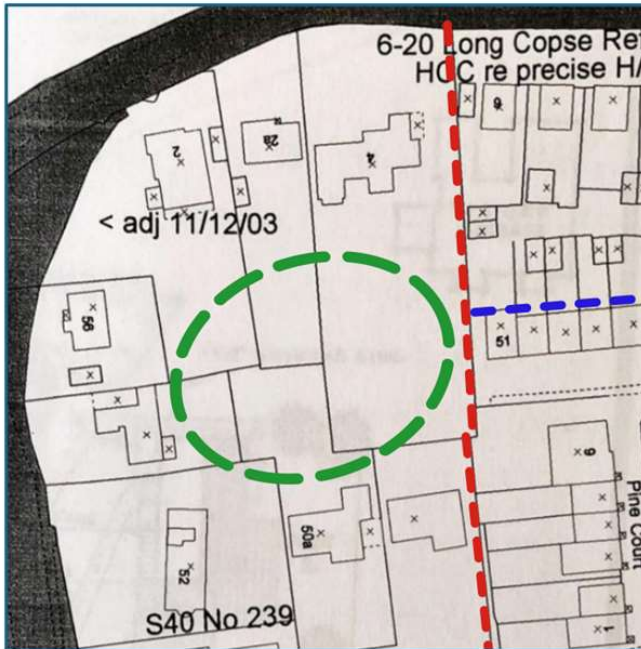


Figure 1 - Google maps image demonstrating cumulative area of gardens (green) which will be destroyed.

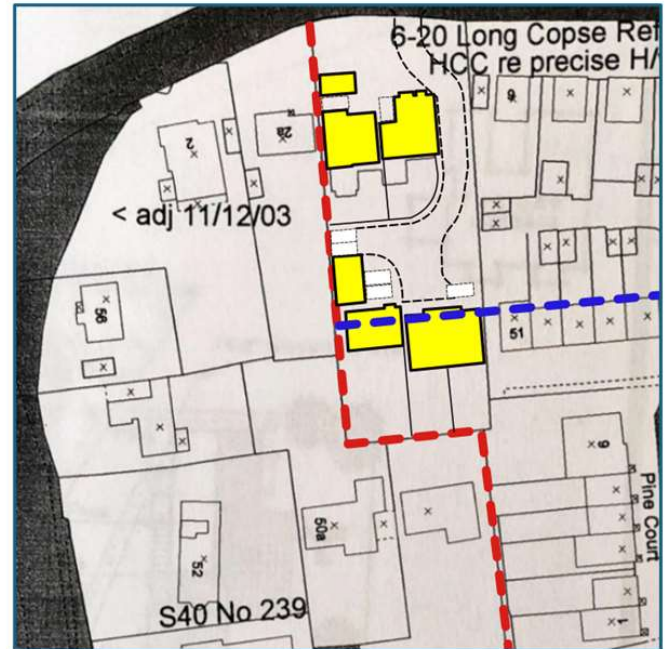
The Proposal design statement, whilst correctly highlighting the difference in character of these areas, is highly misleading in asserting that there is a precedent for backland development of this scale within this immediate area. It asserts that “.... a recently completed scheme by Metis Homes (Cornflower Meadow, Emsworth, PO10 7FR) further East along Long Copse Lane sets a precedent in terms of scale and appearance...”. This is not an appropriate comparison given this 9 house

development was not an equivalent backland development, was on a much bigger green field site, and was within a different area at the Eastern end of the lane.

2) Destruction of a combined, secure and tranquil area of cumulative rear gardens



Current “tranquil island of cumulative garden” (Green line), transition line (red), and building line (blue) along rear of Wraysbury Park properties



Proposed development causes change of character through breakage of tranquil cumulative garden area, moved transition line (red), and extension of building line (blue)+

Figure 2. Illustration of the marked change of character caused by this backland development. (Using HBC plans)

The current cumulative gardens are tranquil, shielded from all traffic and parking, and free of artificial light. The insertion of a parking and turning area and housing within this island of cumulative gardens will negatively affect all the properties in the Western area. It destroys the secure and tranquil island of cumulative garden (shown in dotted green – see also figure 5.8 on pg. 43 of *HBC Design guide*). This green core is removed and replaced with a cramped and (as will be argued in (4) below) inadequate parking area, which will lead to noise, light, and emissions pollution which will negatively affect the character of the area.

3) Domination of the neighbouring buildings and gardens

The proposed backland properties (plots 3-5) on the lower level are suggested to be a continuation of the building line (marked above with blue dotted line), again acknowledging the inevitable change in character of the area. The proposal suggests that these buildings should be “assessed in the context of Wraysbury Park Drive”. However, the submission statement pasted above goes on to clarify that these **will be larger than** the Wraysbury Park properties to the east, therefore dominating and crowding the adjacent gardens and properties in all directions. This statement, and the application elevations contradict entirely the applicants’ simultaneous assertion that the backland properties are subservient, as they are required to be. The dominance, overall mass and height of the proposed development contravenes HBC Design Guide SPD (5.26).

Furthermore, this is not a genuine continuation of the building line from Wraysbury Park, since the properties to the east have their front entrance to the south with gardens to the North, rather than to the South.

The proposal can NOT provide a sympathetic transition from one area to another. ***Changing the current plot into a transition area of this nature would inevitably fail to maintain or enhance the existing character and quality of the existing area***, in contravention of HBC Design Guide SPD.

Appendix B

Impact on neighbouring properties

The proposal has a clear negative impact on all neighbouring properties amenity to varying degrees, which includes loss of privacy, loss of sunlight, harmful effect of excess traffic noise, fumes and light, loss of outlook, and dominance of the new buildings within the lower area of the site.

*(Policy CS16 (1e): The development does not cause unacceptable harm to the amenity of neighbours through **smell, the loss of privacy, outlook, noise and overlooking.**)*

The HBC response to the pre-application submission acknowledges the expected significant negative impact on the neighbouring property to the East of the site, specifically related to issues of the access road. The access route is immediately adjacent to the habitable rooms of this property. The applicants do not appear to have addressed these concerns in their submission.

There is no acknowledgement within the submission of the considerable negative impact on the property to the West of the site. This property, its amenities and character are yet another that will be highly negatively affected by the proposed development.

1) Complete obstruction of ground floor window of neighbour by Property 2

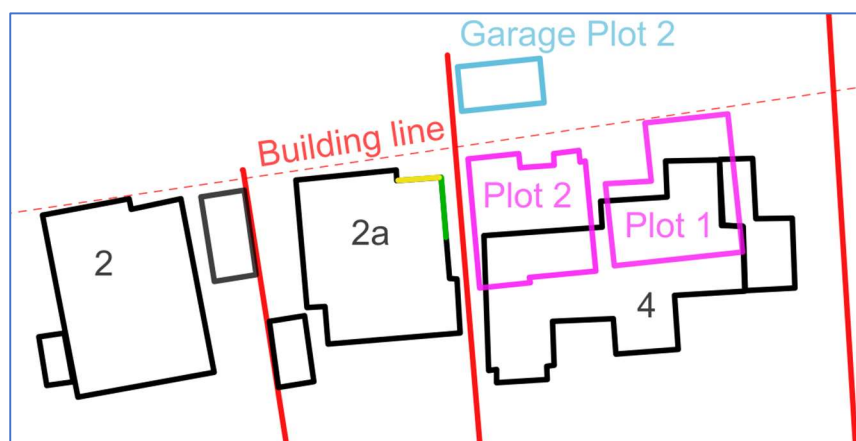


Figure 3. Overview plan of current properties (principally black outline), borders (red), proposed properties (purple) and garage (blue outline). The area of new overshadowing of Plot 2 against existing 2a is shown in green.

The proposed property on Plot 2 moves the northerly extent of the building further north by more than 6 metres leading to a significant new overlap with the westerly neighbour which removes light and outlook. The existing building (Oklahoma) leaves an unobstructed 4.7 metre East facing aspect (marked in green on Figures 3 & 4). The proposed building (Property 2) completely obscures and overwhelms this aspect and extends further north, darkening the area shaded yellow in Figures 3 to 5.

The plans show that Property 2 will be very close (approx. 2 – 2.3 metres) to the currently open eastward section of property 2a (marked in green on the plan below) at a height of 2 storeys plus the additional roof. A comparison between current (black lines) and proposed (pink lines) can be seen in the detail in Figure 4 below.

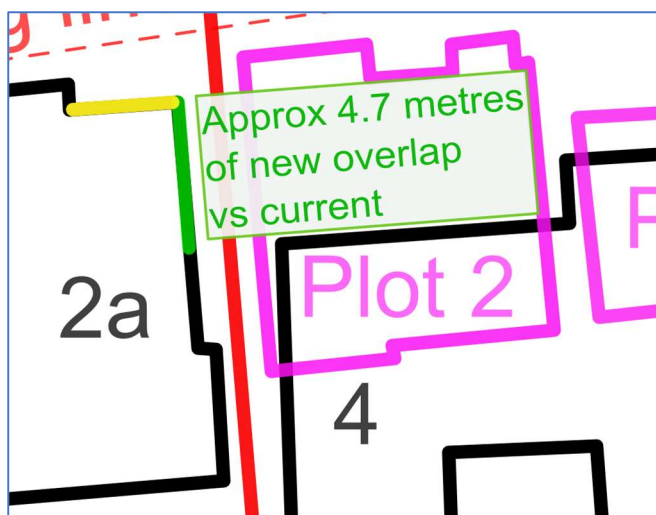


Figure 4. Detail showing new area of 2 storey overlap (green) by new property (pink) vs. current (black)

The area of obstructed light by the proposed plan shown in green above can be seen in the photograph below. This area has an existing picture window which provides an outlook to the morning sunlight (in the summer months) and an important source of light to the north easterly corner of the property labelled 2a above.

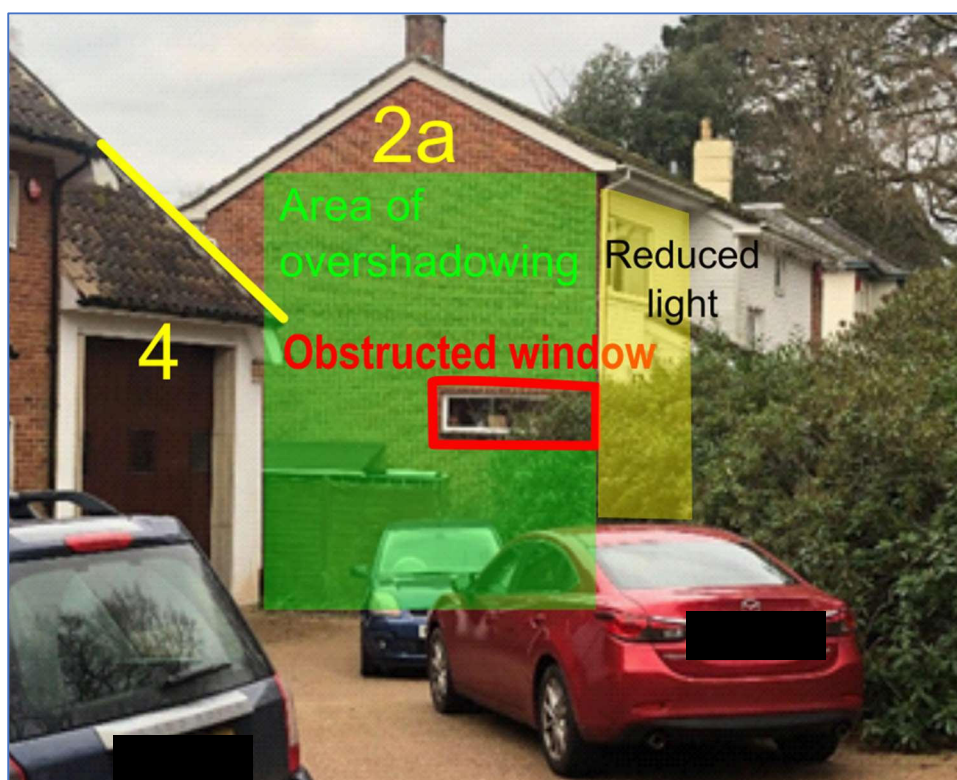


Figure 5. View looking west toward property 2a from current driveway of 4. The open area shown in green which faces east will be completely obstructed by 2 stories of the proposed property on plot 2. The current window marked in red will be completely obstructed.



Figure 6. View between property 2a and 4 looking South. Showing current distance of 2 metres between properties, the area in green will be obscured by the proposed property on plot 2 and the window marked in red will be completely obstructed and look onto a solid brick wall to a height of 2 storeys (plus roof)

Figures 5 and 6 above demonstrate that the proposed property 2 will absolutely obscure the natural light and current outlook from this particular window of the neighbouring property. All of the proposed building clearly contravenes the daylight checking guidance of HBC Design Guide SPD (5.09 & Figure 5.2: Daylight checking for new buildings adjacent to existing homes). Furthermore, In the summer months (only), this window enjoys early morning sunlight, and this sunlight will be obscured in contravention of HBC Design Guide SPD (5.10).



Figure 7. (Images and labels adapted from Design and Access Statement of MH Architects)

1. View of Oklahoma front elevation with western front roofline marked in red
2. View from rear garden of Oklahoma looking north towards rear elevation with rear western roofline marked in red

The design of the existing property has a low level single storey “boat shed” garage with sloping rooflines (marked in red in images 1 and 2 of Figure 7 above) towards the west and a relatively low apex of the western ridgeline of the property (marked in yellow on image 2 above), which is sympathetic to the western neighbour in allowing good levels of sunlight despite the main walls of the properties being only 2-2.3 metres apart. The elevations of proposed property 2 show that this

will be closer to the neighbouring building, significantly higher than existing building and will be overbearing to the neighbouring property and its amenities, particularly with regard to light, privacy and outlook.

2) Removal of privacy between proposed property (plot 2) and current elevated patio of property to West

The property to the West (2a) has a raised patio area at the rear. This area is currently afforded some privacy due to the shielding of the westerly face of Oklahoma (the current property). The planned development will completely remove this shielding (shaded in yellow in picture below), leading to a loss of privacy for the existing neighbouring property (2a) and a reciprocal lack of privacy for new residents of proposed property 2. The height of the established building (shaded in yellow) is single storied with a high roofline (this area was designed by the former owners as a boat shed) and is sympathetic to the neighbouring property.



Figure 3. View east toward Oklahoma from patio of property currently on site 2a. Area in yellow will be removed and is proposed to be replaced by the lower level patio and garden of property 2.

3) Negative effects of properties on plots 3-5

The proposed construction of new buildings on plot 4 and 5 (and to a lesser extent 3) will lead to obstruction of low winter sunlight to the existing property 2a and its garden. The extension to the building 2a was designed to take advantage of the sun's orientation for solar gain. This therefore contravenes HBC Design Guide SPD (5.10).

The proposed buildings on plots 3 and 4 (and to a lesser extent 5) are larger than their neighbouring properties to the West and will lead to an unacceptable obstruction of afternoon and evening sun for the properties and gardens of Wraysbury Park Drive to the east. This also contravenes HBC Design Guide SPD (5.10).

The outlook from the neighbouring property will be negatively affected. A conservative illustration of this effect may be seen in the picture below. This illustration continues (in red) the (lower and less dominant than proposed) roofline of the current Wraysbury Park properties in a modest approximation of the minimum roofline of the development on site. This development would lead to a loss of outlook, sunlight and access to the sky from the garden of neighbouring properties. This contravenes HBC Design Guide SPD (5.10)



Figure 4. Illustration of the dominance of the minimum roofline (extension of smaller Wraysbury Park properties). Note that the proposed properties' rooflines are significantly higher than the minimum height illustrated.

Appendix C

Inadequate and Impractical Parking, Turning and Access arrangements

[P1 – Failure to provide sufficient allocated parking for residents] The plans for a significant increase in the number of properties on this site has to lead to an associated (although in this case demonstrably unsuccessful) attempt by the applicant to meet the minimum number of allocated parking spaces. This inevitably leads to an undesirable *“increase in areas of hard surfacing, with the removal of lawns and plants and production of a much harder environment and change the character”* (HBC Design Guide SPD, pg. 29) with replacement of grass with hard standing and a relative dominance of vehicles which leads to a change in character of the area through an increase in noise to the detriment of public realm.

Even though the **submitted plans do NOT meet the HBC parking standards**, there is still a demonstrable negative change in character of the area as a result of the parking and turning areas required. Increasing the parking provision to meet the standards would lead to further negative impacts.

The requirement for additional parking spaces to meet the minimum standards for the proposed properties will lead to *one or more* of the following outcomes:

- a) A reduction in the facility of the proposed turning space (hence invalidating key reassurances made in the analysis of vehicle movements (documents “TECHNICAL REPORT” and the “Swept path analyses”), including impedance of safe access for Emergency Vehicles).
- b) Obstruction of the access road for vehicles and/or pedestrians due to parking outside designated spaces. Any vehicles parked on the walkway could endanger pedestrian access to or from the site (particularly the lower area).
- c) A need for residents and any visitors to park on Long Copse Lane. There is no safe roadway parking on the lane in the vicinity of the proposed properties.
- d) Inevitable congestion of the already cramped and inadequate parking area, leading to:
 - a. A need for excess manoeuvring (particularly at busy morning and evening times) and increased noise, light and emissions pollution for neighbouring properties.
 - b. Risk of damage to residents’ vehicles during tight manoeuvres.
 - c. Risk of damage to the proposed Parking Barn, leading to further limitation of available spaces.
 - d. Risk of damage and disrepair to the proposed landscaping of the rear parking area, leading to further negative impact on the area as a whole.
 - e. Disagreements between residents.

Various statements within the planning application submissions are misleading and incorrect regarding parking spaces. For example, the applicants’ submission “APPLICATION FORM REDACTED” is incorrect when it states in the section “Vehicle parking” that the current site has 2 spaces and ***that the new development will have a total of 7 spaces***. Whilst this may be a simple lack of attention to detail, it might bring into question the validity of submissions made as part of this application.

In the later submission “PLANNING STATEMENT”, section 3.1 states that, for the 4 bedroom properties at the front of the site, **“Each [4 bedroom] dwelling will have two parking spaces [standard is for 3 allocated spaces, or 2.4 unallocated spaces], one on a driveway and one in a garage.”** This immediately fails to meet the requirements of the Havant Borough Council Parking SPD (2016) which includes the following table for allocated spaces (page 10):

TABLE 4A	
C3 Dwelling Houses – Vehicle Parking	
Size of dwelling \ Zone	Minimum Car Parking Requirement
1 Bed Unit	1 space
2 Bed Unit	2 spaces
3 Bed Unit	2 spaces
4+ Bed Unit	3 spaces

The plans and the HBC standards are shown in the table below. The drawing plans provide a total of 12 spaces (including the garages of property 1 and property 2). The standards show that there should be at least 13 spaces for a development of this nature. **The plans have insufficient allocated parking spaces and contravene Havant Borough Council Parking SPD (2016).**

From application documents				HBC documents
Property number	Bedrooms	People	Provided spaces	Parking SPD minimum
1	4	7	2	3
2	4	6	3	3
3	3	5	2	2
4	3	5	2	2
5	4	6	3	3
Totals	18	29	12	13

Furthermore, the garages of properties 1 and 2 are designated for cycle parking of at least 2 cycles. This will reduce the utility of these garages as designated parking areas.

[P2 – No genuine access to 3 spaces for property 1] There is no direct or safe rear access to the lower parking area for property 2. The rear of this property is bounded by a 1.8m high brick wall without any provision for rear access on the plans. This property (which is designed with 4 bedrooms for 7 people) can therefore only access the 3rd required space (PS-2 on the diagram below) by walking around property 1 and down the access road footway. It would not be unreasonable to expect that the residents of the properties at the front (particularly proposed property 2) would prefer to park nearer to the front of the site, unless there were *very strict adherence to and enforcement of the use of nominated parking spaces*. If they have more than 2 vehicles (and/or if their garage is used for anything other than car parking), they or their visitors will inevitably have to park in non-designated areas causing potential disruption, obstruction or danger to users of the access road or main thoroughfare. (This contravenes English Partnerships – Car Parking, What Works Where)

[P2 – Impractical arrangement of spaces]

The arrangements do not allow genuine or equal access to all spaces, with at least two of the 10 proposed parking spaces (labelled as PS-8 and PS-9 in red on the adjacent diagram) potentially obstructed by others (labelled as PS-5 and PS-6 in blue on figure x). As a consequence, cars would have to be “shuffled”, leading to excessive additional noise, light and exhaust pollution for residents and neighbours. This can be expected during times of the day when there is highest home occupancy in the area, leading to maximum disruption for residents and neighbours. There is no consideration of the consequences of the inadequate parking provision within the analyses of traffic movements.

[P3 – Parking barn limitations]

Furthermore, the illustrations shown of the parking spaces within the parking barn (PS-4, 8 and 9) suggest that it will be very difficult for residents to enter and exit their vehicles if parked in space PS-8. This space is therefore likely to be unpopular with residents, leading to avoidance which effectively reduces the number of spaces provided. This would be compounded if “blocker space” PS-5 was occupied in preference. The parking barn spaces will be an open ground floor structure which does not allow residents to see what is happening in this parking area and contravenes (*English Partnerships – Car Parking, What Works Where – Pg 15*)

[P4 – Reversing out of site] The current arrangement of spaces will require residents parking in spaces PS-2 to PS-7 either to perform a turning manoeuvre or reverse into or out of the site. This could involve movement of up to 6-8 vehicles, which will result in excess additional noise, light (during hours of darkness), and exhaust pollution for residents and neighbours during times of highest home occupancy.

[P5 – Turning for property 1 and 2] There is no provision of or analysis of turning space for vehicles of the proposed properties 1 & 2 at the front of the site, which will have to either reverse into or out of the main access road leading to inherent risk, or perform a difficult and tight turning manoeuvre impinging on their neighbour’s driveway.

[P7 – Narrow access road] The access road to the rear parking and turning area is narrow with a pinch point of 4.1 metres and constrained by brick structures to the west and a border to the east.

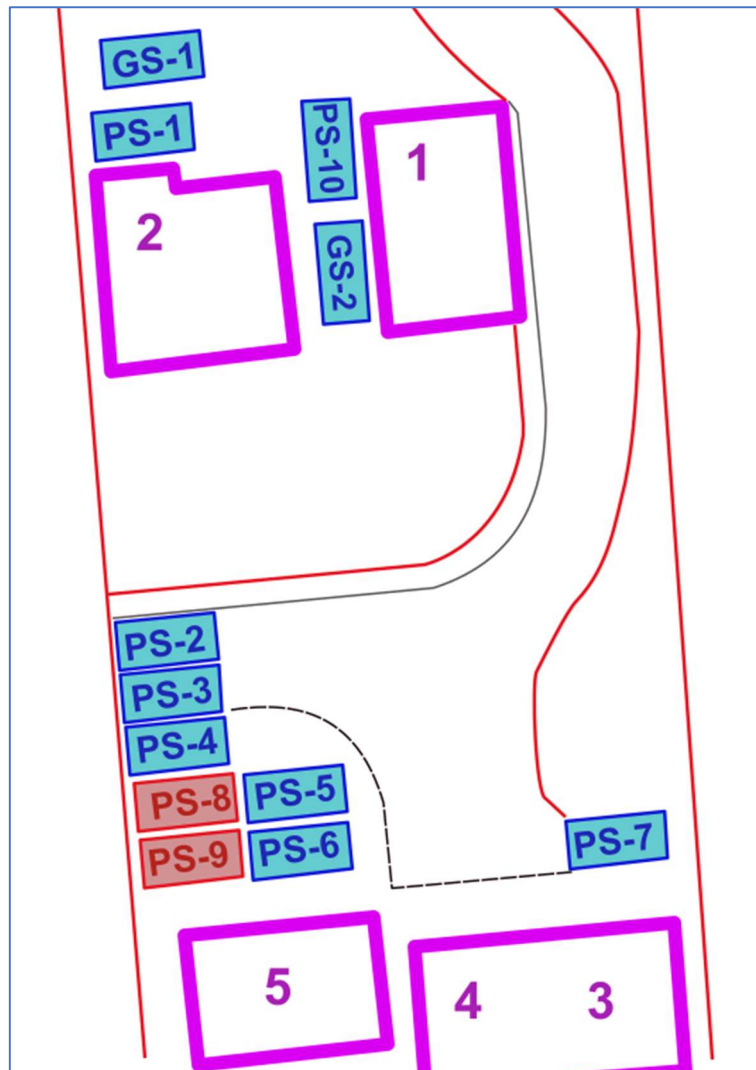


Figure 10. Illustration of planned parking (PS-x) and garage (GS-x) spaces

There is no passing area. When vehicles meet from opposing directions on this access road, there will be limited passing room and one of these vehicles will have to reverse skilfully, either within the constrained lower area or into the main thoroughfare. This problem is compounded by a lack of visibility of the exit of the access road when leaving parking spaces PS-2 to PS-9 (excluding PS-7) which do not allow visibility of the whole of the access road.

[P8 – Excess manoeuvring] In the submission document titled “TECHNICAL NOTE” (143.0034TN1) the proposed development could potentially generate up to 3 two-way vehicle movements in the AM peak, 2 two-way vehicle movements in the PM peak and up to 24 two-way vehicle movements across a 12-hour period. This may be an under-estimate because it is based on minimum numbers of vehicles within the development. There is also an acknowledgement that the access is not sufficiently wide enough to accommodate all vehicle manoeuvres simultaneously. The access road has a pinch point of 4.1 metres which will be insufficient to allow 2 standard cars (or a car and a delivery van) to pass safely without danger of damage. However, there is NO acknowledgement that the layout of the site will therefore require inevitable additional manoeuvring. Furthermore, there is NO acknowledgement of the significant negative impacts and dangers of any additional parking outside the insufficient planned spaces will.

[P9 – Pedestrian and Cycle access] The parking area and access road do not encourage pedestrian access. The footway adjacent to the wall (west of the access road) is incomplete. It is clear that the planners have prioritised the maximisation of the number of properties and their accommodation, have overlooked or ignored the minimum parking space requirements, have failed to consider adequately the impact of the access road on the property to the East, and have failed to design a useful shared space for the future residents which is “*welcoming, safe and encourages pedestrian and cycle movement*”. HBC Design SPD (5.18). Nor the design “*encourage people to walk and cycle*” (4.05)

[P10 – Garage and Car Barn position] The garage proposed for property 2 projects well ahead of the Long Copse Lane building line. The car port for the lower area (properties 3-5) projects well ahead of any purported/virtual “building line” extending from the Wraysbury Park Drive. The proposed placement of these buildings contravenes HBC Design SPD (5.21).

[P11 – Rear parking boundary] The proposal shows that the private rear boundary between the rear courtyard parking area and the adjacent property to the West (2a) is wooden fence. This will not be sufficient to limit the impact of noise and disturbance to neighbouring residents. This contravenes the HBC Borough Design Guide SPD (5.22)

Appendix D

Shared parking and turning area – lighting and security

The proposal does not show any lighting for the rear courtyard parking area. Any lighting in this area would have to be very carefully considered in order to avoid inevitable excess light pollution for the secure and tranquil island of cumulative gardens in the area. Any lighting introduced into this area would contribute to a removal of the green core, risk light pollution of the night sky and would have a negative impact on the area. This contravenes the HBC Borough Design Guide SPD (5.22).

With the limitations around lighting and the layout of the development, there is an increase in opportunity for crime, unwitnessed access to neighbouring properties and anti-social behaviour within the shared parking and turning area. There has been inadequate consideration of Security and Safety, contravening HBC Borough Design Guide SPD (4.29)

Shared parking and turning area - Maintenance

There has been no indication around provision of management and maintenance of this shared area (including the predominantly wooden parking barn, borders and hard standing) which may therefore run into poor repair and become an unpleasant area over time. This contravenes Planning Policy C16 (2a).

Appendix E

Services and Waste

The current proposal cannot satisfy the HBC Borough Design Guide SPD with regard to Services and Waste. The applicants acknowledge this on a number of occasions within their submissions. The bin carry distance for residents as documented in submission document “INDICATIVE BIN STORE LOCATION AND CARRY DISTANCE” (Drawing number 143.0034-0008-P01) is given as at least 40.5 metres.

The proposed location of the bin storage location is to the eastern border of the main driveway. There is no apparent safe of adequate pedestrian walkway on the bin store (East) side of the access road for a pedestrian wheeling a bin to the proposed bin storage area.

The “General Notes” on the submitted plans are incorrect in stating that a carry distance of 40.5 metres was acceptable at the pre-application stage. The HBC response at pre-application stage specified that the carry distance should be less than 30 metres for residents. The proposal exceeds the 30 metre walk/carry distance set out in Manual for Streets for residents.

The collection point is squeezed onto the eastern border of the site at the already very narrow access road. This contravenes HBC Borough Design Guide SPD (5.24) and completely fails to respond faithfully to the HBC response to the pre-planning application.

The movement of bins and maintenance of the bin store will lead to excess noise for the properties to the East.

Appendix F

Surface Water Drainage

The application pays inadequate attention to surface water drainage. Whilst the flood risk map would suggest low risk of flooding impact, the Southern half of the site is low lying and the proposed gardens of properties 3-5 can be expected to be waterlogged and unusable as gardens at wetter/winter months of the year unless there is further attention to surface water drainage. The run off plan provided supports this assertion, and the issue will be compounded by the large area of hard standing to the centre of the site.

The submitted plans do not adhere to Core Strategy Policy CS15 Flooding and Erosion Risk, *“all new development in the Borough is required to ensure that there is no net increase in surface water run off”*. There has been no attempt to reduce rainfall runoff into drains, the planning application (“APPLICATION FORM REDACTED”, sub-section “Assessment of flood risk”) specifies that surface water will be drained via the main sewer. There is indication that rainwater will be directed to a lawn or border to drain naturally. The planners have given no priority to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage. This contravenes HBC Design Guide SPD (4.26)

If surface water from the new areas of hard standing (and from the buildings themselves) is drained via the sewer as planned, this will contribute to an net increase in volume of water through the sewers, leading to a risk of exacerbation of the well-publicised occasions of foul overspill of sewage into Chichester Harbour during periods of heavy rain. The development shows no regard for the importance of Sustainable Drainage Systems, nor any awareness of the impact of this development on the wider community.