Gmail

Planning - <planning@adur-worthing.gov.uk>

AWDM/1233/24

1 message

[redacted] 8 November 2024 at 15:43

To: Planning - <planning@adur-worthing.gov.uk>

[redacted]

Could you kindly confirm that this has been posted on the planning portal.

Dear Adur Planning,

On behalf of concerned residents, Lancing Manor SE Residents Network (LMSERN) would make the following observations in respect of the applicant's further comments of the 24.10.24 for the above application.

Flood Risk Assessment - WSP

Whilst the permitted development approval under GPDR criteria does not call for a drainage assessment of a submitted scheme, the permitted side extension under those rules happens to be only a part of this application which is seeking planning approval. For full planning, WSP is absolutely correct in requesting a full Flood Risk Assessment (FRA) for the scheme it being in EA flood risk zones 2&3. They have requested a hold on the planning decision because it is that important.

National Planning Policy Framework rules apply and specifically:-

NPPF Paras 173 & 174

173. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment *59

Footnote 59

*59 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

174. Applications for some minor development and changes of use *60 should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 59.

Also Adur's local plan policies also apply:-

Policy 35 Water and Protection

Sustainable Drainage

4.128 Sustainable Drainage Systems (SuDS) are a way of managing rainwater falling on roofs and other surfaces. The key objectives are to manage the flow rate and volume of surface runoff to reduce the risk of flooding and water pollution. SuDS also reduce pressure on the sewerage network and can improve biodiversity and local amenity Policy 36: Flood Risk and Sustainable Drainage The Council will work with relevant bodies to ensure that flood risk in Adur is reduced. A site specific flood risk assessment must be submitted with planning applications for:

- Proposals of 1 hectare or greater in Flood Zone 1

- All development or changes of use to a more vulnerable use in Flood Zones 2 and 3

- All development or changes of use to a more vulnerable use, regardless of flood zone or size, where flood risk from other sources (surface water, sewer, groundwater) is identified by the Strategic Flood Risk Assessment.

The flood risk assessment will need to demonstrate that development:

- is appropriately flood resilient and resistant, includes safe access and escape routes where required, and that any residual risk can be safely managed;

- will be safe for its lifetime taking account of the vulnerability of its users;

- will not increase flood risk (including sewer flooding, surface water and groundwater flood risk) elsewhere;

- will, where possible, reduce flood risk overall; and

- will give priority to the use of sustainable drainage systems.

As stated in LMSERN's previous comments this Flood Risk Assessment must also include the rear garden where the land has been raised by 45cms. This gives residents great concern over increased flooding of gardens and the area with the rising groundwater which now occurs virtually every winter.

The FRA should also include the written evidence from the applicant's civil engineer on the sustainability of the compacted infill undertaken to raise the land and its drainage characteristics.

Every property in this area has roof drainage into soakaways in their gardens. Drainage into flower beds/the lawn sounds doubtful as to its sustainability. It may indicate that no SuDs type /soakaway systems are being employed by the applicant. ***Yet another reason for a full Flood Risk Assessment.***

Attached is a video which gives evidence as to the area's ground water flooding problems. It shows the neighbouring property's rear garden which suffers winter flooding from rising ground water and requires sump/pumping out into the road drainage to prevent flooding into the house. Worsening of this problem is of great concern for that property and other properties and the area generally.

Front Dormer and black weatherboarding cladding

Every submission from residents objects to the front dormer because it is out of character with all the housing in Manor Way. As was suspected, although not declared in the original submission documents, the applicant's intention is for the weatherboarding of the dormers/side hip to gable to be finished in black.

Residents unanimously object to this colour. We refer to the Adur Local Plan:-

Policy 15:

Quality of the Built Environment and Public Realm Development should be of a high architectural quality and respect and enhance the character of the site, and the prevailing character of the area, in terms of proportion, form, context, massing, siting, layout, density, height, size, scale, materials, detailed design features and landscaping. Development should:

- Enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping and layout of the development;

- Include a layout and design which take account of the potential users of the site;

- Incorporate the principles of securing safety and reducing crime through design in order to create a safe and secure environment;

- Make a positive contribution to the sense of place, local character and distinctiveness of an area; and not have an unacceptable impact on adjacent properties, particularly residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook or open amenity space;

- Respect the existing natural features of the site, including land form, trees and biodiversity and contribute positively to biodiversity;

This proposed scheme fails to achieve Policy 15 requirements and LMSERN believes this is a further reason why this proposal in its current form should be refused. Most certainly, the matter of the colour of the

weatherboarding should not be subject to a post approval condition. In the light of the above Policy 15, it is a key matter for the consideration to approve/refuse this application.

Comparisons to front dormers in other roads in the area are irrelevant. So is the mention of the dormer on the rear elevation of No1 Manor Way. Its weather boarding colour is a soft, non-intrusive green colour which in no way intrudes visually on neighbouring back gardens. It in no way affects the street scene because it is rear facing unlike the proposed, road facing black dormer in this application.

It is noted that for the withdrawn application AWDM/1542/23, the planning officer who had confirmed to the undersigned that he was visiting the site refused to permit the front dormer obviously based upon local plan policy. This refusal must surely predicate the same decision to refuse this road facing dormer.

Loss of privacy to neighbours

There is a similar 'loss of privacy' problem with another application at 42 Brighton Road Lancing AWDM/0970/23 where land levels had been built up without approval causing severe loss of privacy to neighbours. The application was finally approved but the approval notice imposed a condition (No 16) that the original ground level must be restored within a short time frame and would be inspected by the authority.

We request that whether this application for 4 Manor Way is refused or approved, the council will stipulate that the rear garden be restored to its original level to give neighbouring properties the privacy which this land relevelling has taken away and remove the concerns for worse problems of drainage.

Discussion with neighbours

The applicant states that there had been prior discussion with neighbours for this scheme. There has been no such relevant discussion to outline what was being submitted. Residents only became aware of this when notified by the planning department. Certainly, the undersigned who lives opposite has never had an approach from the applicant or spoken with him since living there. If there had been discussion, their reaction would certainly have been to object with all the concerns as above.

Driveway Stones on the Pavement & Road – Public Safety

The derisive statement that this issue was 'comical' shows a disregard for public safety. The driveway, which is purported to be permeable for drainage, is comprised of large pebble type stones which do get scattered onto the pavement and into the road with the movement on and off the site by vehicles. Currently, it has been observed that the applicant hastily picks up scattered stones to keep pavement and road clear. There is obviously a problem. The question to be asked is if this beach sized stone material is a suitable surface for such a driveway?

Residents are certain that this is a public safety issue.

Once again, on behalf of its concerned member LMSERN respectfully requests that, as submitted, this application be refused and particularly the rear garden land be restored to its original level.

Yours faithfully,

[redacted]

DW Freeman (MR)

LANCING MANOR SE RESIDENTS NETWORK

5 Manor Way

Lancing

BN15 0QU

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