

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF

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From: Joel Anderton [REDACTED]
Sent: Friday, March 22, 2024 9:21 AM
To: Planning <Planning@arun.gov.uk>
Subject: AL/11/24/OUT - Objection Letter

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Good morning,

Please find attached letter.

Kind regards,

Joel Anderton

Mr J Anderton
103 Peckham Chase
Eastergate
Chichester
West Sussex
PO20 3AR

Planning Department
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

15 March 2024

OBJECTION TO PLANNING APPLICATION REFERENCE AL/11/24/OUT

Dear Sirs,

I write to formally object to the above-mentioned planning application submitted regarding the land east of Westergate. Throughout this objection, I reference the Aldingbourne Neighbourhood Plan adopted by Arun District Council in 2016, revised in 2020, and adopted by Arun District Council on 14 July 2021.

The addition of 400 new houses in this location is impractical given the current pressures on the already failing infrastructure. The roads in the locality are congested, in disrepair, and regularly closed or under some form of traffic management for various reasons. The railway crossing at Woodgate already causes significant congestion during rush hour traffic, and further increases are expected with Southern Rail's announcement of increased services from June 2024. Additionally, proposed traffic lights at the entrance of Pine Close will worsen congestion and potentially gridlock the villages. While discussions regarding the alignment of the A29 are ongoing, they are not suitably progressed. Any future development on this parcel of land should follow the realignment of the A29, given the already high traffic volume along Westergate Street. If the council considers granting planning permission, Grampian Conditions should be imposed to ensure infrastructure is upgraded before development takes place.

The land subject to this planning application should be used for recreational purposes, as it currently is. Hundreds of residents and visitors use this land to exercise, benefiting from its relatively safe environment, and the natural chalk spring running through the fields supports biodiversity, including water voles, kingfishers, and freshwater shrimp.

Local schools are already at capacity, with Ormiston Six Villages Academy struggling for space for their current cohort of students, as evidenced by their recent request to close the gym and utilise this space for their own needs. Adding 400 homes to the area with a school already at capacity is impractical. Developers pay a levy to the Local Authority, but funds are often not reinvested into infrastructure as intended, resulting in substandard services which the residents have to accept as being the norm.

Access to GP appointments is challenging, and this will worsen with the proposed development, putting yet again further pressures on already failing, substandard services.

Policy EH2 Green Infrastructure and Ecosystem Services

The proposed development, situated in close proximity to the Rife, poses a significant threat to the integrity and function of the Biodiversity Corridors identified on Maps A1 and A2 within the Aldingbourne Neighbourhood Policy. The Rife serves as a vital habitat for numerous species of wildlife, including water voles, bats, freshwater shrimp, kingfishers, and various fish species among others. The potential adverse effects of this development on such a diverse and fragile ecosystem cannot be overstated.

Policy EH2 explicitly mandates that new development within or adjacent to Biodiversity Corridors must not cause significant harm to their integrity or function. Furthermore, it requires developers to demonstrate how their proposals will impact these corridors and provide adequate mitigation measures to prevent harm to the designated areas. Additionally, the policy emphasises the importance of enhancing the overall function and integrity of Biodiversity Corridors to achieve a 'net gain' in biodiversity.

The proposed development fails to adhere to these essential policy requirements. It does not adequately address the potential adverse impacts on the Biodiversity Corridors, particularly the disruption of the natural habitat provided by the Rife. The loss or degradation of this habitat would not only harm the resident wildlife populations but also compromise the connectivity between the South Downs and the coast, which is crucial for maintaining biodiversity in our region.

Furthermore, part of the Plan area falls within the 12km buffer applied to the Singleton and Cocking Tunnels Special Area of Conservation (SAC), as per policy SD10 of the South Downs Local Plan. Protecting the habitats within the biodiversity corridors is essential for the feeding, roosting, and movement of bats, as highlighted in EH2.3 of the Neighbourhood Plan.

In light of these concerns, I urge the planning committee to reject this application unless the developer can demonstrate unequivocally that the proposed development will not cause any significant harm to the integrity or function of the Biodiversity Corridors. Additionally, the developer must provide comprehensive mitigation measures and a robust management plan to ensure the long-term protection and enhancement of the affected habitats.

EH12 Protection of bat habitats

The proposed development site is situated within close proximity to significant bat habitats, including mature treelines, hedgerows, and watercourses, which serve as crucial foraging areas and commuting flight lines for various bat species, including Barbastelle and Bechstein bats. These habitats play a vital role in supporting the local bat populations and contribute to the ecological balance of the area.

Policy EH12 of the Neighbourhood Plan mandates that proposals for development within greenfield sites must evaluate the potential for the loss of suitable foraging habitat and the severance of commuting flight lines for bats. Furthermore, it stipulates that features such as mature treelines, hedgerows, and watercourses must be preserved unless surveys demonstrate that they are not utilised by bats associated with nearby roosting sites.

The proposed development fails to adequately address the requirements of Policy EH12. There is a significant risk that the construction activities associated with the development, along with the subsequent habitat disturbance and potential introduction of artificial lighting, could disrupt the foraging and commuting patterns of local bat populations. Such disturbances could have adverse effects on the integrity and function of the Singleton and Cocking Tunnels Special Area of Conservation (SAC), as highlighted in the Habitats Regulations Assessment (HRA).

Moreover, EH12.1 of the Neighbourhood Plan emphasizes the need for additional protection to be given to the Singleton and Cocking Tunnels SAC, especially considering that bats are known to travel long distances from their roost sites. Any adverse effects on the site integrity regarding the loss of functionally linked land must be avoided to ensure compliance with the Habitats Directive.

In light of these concerns, I urge the planning committee to reject this application unless the developer can provide robust evidence demonstrating that the proposed development will not result in any adverse effects on the local bat populations or the integrity of the Singleton and Cocking Tunnels SAC. Additionally, measures must be implemented to minimize disturbances to bat habitats and ensure the long-term protection of these valuable ecological assets.

EH6 Protection of trees and hedgerows

The proposed development entails the removal of a significant number of trees and hedgerows, which not only hold arboricultural and amenity value but also serve as vital habitats for local wildlife, including bats and various small mammals. Policy EH6 explicitly states that development resulting in the loss of trees or hedgerows of ecological significance will be resisted unless the need for development in that location clearly outweighs the loss. Furthermore, development proposals must be designed to incorporate biodiversity within and around developments, aiming for a net gain for nature.

The removal of trees and hedgerows as part of the proposed development would have far-reaching consequences for the ecological balance of the area. Trees and hedgerows contribute to the open and pleasant feel of the Parish, providing essential habitats and corridors for wildlife such as bats, which are known to breed in Aldingbourne. Additionally, the loss of ground cover and habitat can have a significant detrimental effect on wildlife, particularly small mammals and birds such as owls, which rely on these habitats for food and shelter.

Moreover, EH6.2 of the Neighbourhood Plan highlights the importance of protecting habitats within biodiversity corridors, especially considering the proximity of the Plan area to the Singleton and Cocking Tunnels Special Area of Conservation (SAC). These habitats play a crucial role in providing feeding and roosting sites for various species, further emphasizing the need to preserve trees and hedgerows within the development site.

In light of these concerns, I urge the planning committee to reject this application unless the developer can demonstrate that the need for development clearly outweighs the loss of trees and hedgerows and that adequate measures will be implemented to mitigate the impact on local wildlife. Furthermore, any proposals must incorporate measures to ensure a net gain for nature and adhere to the principles outlined in Policy EH6 of the Aldingbourne Neighbourhood Plan.

EH4 Protection of watercourses

The proposed development site is situated in an area already affected by ongoing sewerage overflows, primarily due to the Lidsey treatment plant being at capacity. These overflows have had a

detrimental effect on the local watercourses, leading to pollution and degradation of water quality, which in turn, has negatively impacted the wildlife and biodiversity within the stream.

Policy EH4 of the Neighbourhood Plan emphasises the importance of supporting and promoting river catchment management, wildlife conservation, and flood risk reduction. It recognizes the significance of the Worthing, Chichester, and East Hampshire Chalk aquifers, which give rise to the chalk streams flowing through the Parish, forming part of the Arun and Western Streams river catchment area.

The ongoing sewerage overflows resulting from the capacity issues at Southern Water's Lidsey treatment plant are directly contrary to the objectives of Policy EH4. These overflows not only contribute to rising nitrate levels in the chalk aquifers but also pose a significant threat to the biodiversity and ecological integrity of the watercourses in the area. Sussex Wildlife Trust has identified the streams to the West of the Parish as having the potential to be restored to provide greater biodiversity, underscoring the importance of protecting and enhancing these natural habitats.

Furthermore, it is imperative that any development within the Parish conforms with neighboring upstream policies to ensure the effective management and conservation of water resources and ecosystems.

In light of these concerns, I urge the planning committee to reject this application unless the developer can demonstrate that measures will be implemented to address the capacity issues at Southern Water's Lidsey treatment plant and mitigate the impact of sewerage overflows on the local watercourses and biodiversity. Additionally, the developer must adhere to the principles outlined in Policy EH4 of the Aldingbourne Neighbourhood Plan, prioritising river catchment management, wildlife conservation, and flood risk reduction.

EH5 Surface water management

The proposed development site is located within an area already suffering significantly from flooding, exacerbated by high volumes of rainwater. Policy EH5 of the Neighbourhood Plan stipulates that new development within areas at risk from flooding will not be permitted unless supported by a site-specific Flood Risk Assessment, providing clear evidence that the proposal will not increase the risk of flooding to the development site or other land. Furthermore, appropriate provision must be made for accommodating surface water and foul water arising from the development.

The ongoing issues with flooding in the area, as outlined in Policy EH5.3, have resulted in the inundation of residential homes and businesses, surcharging of the local foul sewer network, and disruption of the local transport infrastructure. These incidents of localised flooding have had severe consequences for the community, causing significant distress and financial loss to residents and businesses alike.

Policy EH5.1 underscores the strong opposition from residents to further development until work on the Aldingbourne Rife Integrated Flood Risk Management Plan & Works (ARIFRM) Strategy is completed. The surface water run-off from existing developments has already contributed to flooding in Aldingbourne and neighboring parishes, highlighting the urgent need for comprehensive flood risk management measures before any additional development is permitted.

Moreover, Policy EH5.7 emphasises the importance of maintaining or improving the environment and water quality of the rife system and chalk stream network within the catchment. Any

development proposals must consider the potential impacts on watercourses and their immediate environs, avoiding culverting and constricting watercourses wherever possible.

In light of these concerns, I urge the planning committee to reject this application unless the developer can provide robust evidence, supported by a comprehensive Flood Risk Assessment, demonstrating that the proposed development will not exacerbate the existing flooding issues in the area. Additionally, measures must be implemented to ensure that the proposed development does not adversely affect the environment and water quality of the rife system and chalk stream network.

Policy GA2 Footpath and cycle path network

Footpath 297 serves as a vital pedestrian route utilised by local school children to safely commute to and from their school throughout the day. The proposed alteration and potential elimination of this footpath would have severe consequences, forcing children to cross a busy road to continue their journey to school. Such a change poses significant risks to the safety and well-being of the children and would undoubtedly cause serious harm.

Policy GA2 of the Neighbourhood Plan explicitly supports proposals that improve and extend the existing footpath and cycle path network, emphasising the importance of better access to local amenities, green spaces, housing, and the open countryside. Furthermore, the policy emphasises the resistance against the loss of existing footpaths and cycle paths.

The proposal to alter and potentially cut through Footpath 297 directly contradicts the objectives outlined in Policy GA2. Instead of improving and extending the footpath network, the proposed changes would disrupt an essential pedestrian route relied upon by local school children and residents alike.

Moreover, the alteration of Footpath 297 would not only inconvenience pedestrians but also compromise their safety. Requiring children to cross a busy road without adequate pedestrian infrastructure poses an unacceptable risk and undermines their ability to travel to school safely.

In light of these concerns, I urge the planning committee to reject this application unless the developer can demonstrate an alternative solution that maintains the integrity of Footpath 297 and ensures the continued safety and accessibility of the pedestrian route for local school children. Additionally, any proposed alterations must adhere to the principles outlined in Policy GA2 of the Aldingbourne Neighbourhood Plan, prioritizing the improvement and extension of the footpath network.

This objection highlights the impracticality of adding 400 homes given existing infrastructure strain, threats to recreational space and biodiversity, exacerbation of school and healthcare challenges, and non-compliance with local planning policies. Arun District Council need to reassess their neighbourhood planning policy and stop consenting new housing developments in the villages which are already at capacity.

I urge the planning committee to reject the application unless comprehensive evidence is provided to address these concerns.

Yours faithfully,

Mr Joel Anderton