



Mr S Davis
Planning Officer
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

20 January 2025

Dear Mr Davis

Application AL/137/24/RES – Land to the rear of Meadow Way, Westergate.

In reference to the above reserved matters application, Aldingbourne Parish Council objects to this application based on the following:-

Overall scale of the development

Firstly, the parish council is disappointed to note that the number of homes in the development remains 89, despite Arun's conclusion in the summary paragraph of their Officer's Report that:

"There are several issues with the layout, design and scale of the Reserved Matters submission which together suggest that a scheme of 89 homes in total may not be appropriate (noting that the outline permission was for 'up to 89')".

Aldingbourne Neighbourhood Plan (ANP) policy H3 on 'housing density' applies here:

"To ensure that (housing development) does not harm the established character and appearance of the local area by over- development of sites giving rise to cramped and out-of-character developments".

Characteristic and design

Notwithstanding the above objection, the parish council notes with concern that the flatted building remains 2.5 storeys high, despite objections to this height in the Officer's Report. If permitted, this building would be out of all proportion to the immediate area and indeed the whole parish, which contains almost no buildings more than two storeys high. We share the Arun Officer's Report's concern, in the section 'Layout, appearance and scale,' that:

"The proposed flatted building is out of character in both principle and scale." We also previously asked that consideration should be given that if it is impossible to meet the affordable housing provisions of the application without these flats, the parish council requests that their location be changed to the northern edge of the site. It is noted from the new application that this has not been considered.

The height of this building was the main issue of concern raised to us by the numerous residents living close to the site who attended the Planning Committee of the Parish Council at which the first reserved matters application was considered. Policy H3 again applies.

ANP Policy H1 – the provision of housing to meet the District Councils allocation has been exceeded considerably, despite the fact that Aldingbourne Parish Council has complied with policy H SP1 of the Arun Local Plan for non-strategic sites.

Affordable Housing

The parish council observes with regret that Arun District Council Planning Officers' comments in their Report on application **AL/50/24/RES** in relation to provision of affordable housing have been essentially ignored in this resubmission **AL/137/24/RES**.

Aldingbourne Parish Council strongly supports the provision of affordable housing - affordable/rented, first homes, and shared ownership - in all developments of 10 or more new dwellings within the Parish, and this is incorporated in our Neighbourhood Development Plan 2019-2031.

Policy ANP H4

Any proposal for 10 or more new dwellings should include 30% affordable units. The size and tenure of affordable units should reflect latest available housing needs evidence.

Policy ANP H4.2

Affordable units delivered on-site must be indistinguishable from the market dwellings. Developers will be expected to use the latest available housing needs evidence from Arun District Council to determine the appropriate size and tenure for the affordable homes. Appropriate arrangements should be made to ensure that the affordable housing is delivered and managed in accordance with any relevant adopted guidance produced by Arun District Council .

Policy ANP H1.1.2019 (Housing to meet District Council Allocation)

A percentage of housing delivered by the site will be expected to be delivered through the **Aldingbourne, Barnham and Eastergate Community Land Trust**'.

In your report on application **AL/50/24/RES** , the Planning Officers stated:

(page 13 of 20)

There is also concern with the proposed affordable housing which is entirely located along the southern edge in the denser part of the site. The Council's policy (backed up by the consultee comments) is clear that large clusters must be avoided, and that affordable housing should be spread through a site. In addition, affordable housing must be visually indistinguishable from market housing. The proposed scheme does not achieve this as all the flats and maisonettes are affordable whilst the affordable housing also has its own house types.

It is clear that all affordable dwellings are along the southern boundary with none anywhere else on the site'.

Aldingbourne Parish Council notes that the applicants have made no significant change to their affordable housing proposals in the resubmitted application **AL/137/24/RES**, notwithstanding the Planning Officers' opinion.

Attention is drawn to applicants submitted documents:(attached)

Site Layout - Tenure ((Eric Cole Ltd) AL/ 50/24/RES 24.001.102.Rev 5 (03/06/24)

Site Layout - Tenure ((Eric Cole Ltd) AL/137/24/RES 24.001.502.Rev19 (12/12/24)

Planning Officers' Report AL/50/24/RES Extract page 13/20 (14/08/24)

The affordable housing categories are coloured Dark Blue, Yellow, and Cyan. The market housing is coloured Light Blue.

ALL the 27-unit affordable housing, including the flats, is placed along the southern boundary. There is **NO** affordable housing provision throughout the rest of the 89-unit development.

Accordingly, the parish council supports Arun District Council planning officers' earlier expressed opinion in calling for affordable housing to be delivered in accordance with ADC policy, and through the Aldingbourne, Barnham and Eastergate Community Land Trust

Lidsey Water Treatment Plant

We note that the Lidsey Water Treatment Plant is not due to be upgraded until some point in the future, despite it already having been agreed that it has no further capacity. The parish council would require the upgrade to the Lidsey Pumping Station to be completed ahead of any development commencing.

Surface Water Drainage, Management & Flood Mitigation

The council also observes with regret that the Planning Officer's comments in Report AL/50/24/RES in relation to surface water drainage have not been adequately addressed (or at all) in re-submission AL/137/24/RES and the Applicant's current proposals do not comply with ANP EH5.

In Report AL/50/24/RES at page 17 of 20, the Planning Officer observed that "Policy EH5 requires new development make appropriate provision for accommodating the surface water arising from the development. The application includes a Drainage Strategy report and associated drawings , but this has been assessed as inadequate by WSCC given a lack of supporting data, and a failure to include certain requirements in the calculations . In addition, WSCC note that easements have not been provided to the existing boundary watercourses. On this basis, it is not currently possible to determine compliance with the relevant policies."

The submission of Henry Adams on behalf of application AL/137/24/RES refers to Drainage at paragraphs 6.36-6.41 and an **"updated drainage assessment"**, at the time of submission this document is not available on the ADC planning portal and the parish council reserves the right to make further comments once we have been able to access this document and any other late submissions.

Para 6.37 of the Henry Adams submission describes the intended SuDS including final discharge from the attenuation ponds *"into the existing ditch on the southeastern corner of the site"*. This corner is where the development is accessed from Meadow Way. The existing ditch itself flows into an existing area that is at "High Risk" of surface water flooding for existing properties and the A29 road (see Surface Water Flooding Risk Map on GOV.UK using 24, Meadow Way as search locator).

There is a material risk that the outflow of surface water from the development will flood the access onto Meadow Way and the properties and part of the A29 that are already at High Risk of surface water flooding. The applicant's current surface water drainage strategy does not comply with ANDP

EH5 as it does not provide clear evidence that the proposals "would not give rise to additional risk of flooding, either to the development of the site or to other land".

The Council draws attention to Appeal Decision APP/C3810/W/23/3323888 para 81 "With regard to flood zones surrounding the appeal site, it would be reasonable and necessary to prevent discharges from the development into watercourses and any alternatives to watercourses, unless otherwise approved by the Council".

The Council also draws attention to Southern Water Surface Water Management Policy DS001 (01.07.2024).

"The developer must demonstrate that the site does not increase flood risk both within the development and elsewhere".

The council considers on the available information and evidence provided, the absence of the updated report and calculations etc required by WSCC is a material omission, and that the proposals in AL/137/24/RES constitute a material risk of increasing the likelihood of surface water flooding in Westergate. The current proposals as understood do not properly address the Planning Officer's concerns and do not comply with ANDS EH5

ANP policy EH5 – Surface Water Management. The parish council commissioned a Hydrology report on this matter, details of which were included in our original objection and in the previous Reserved Matters Application and as this has not been resolved we feel the need to once again highlight the following:-

Extracts from report by Richard Allitt Associates Ltd for Aldingbourne Parish Council, 1 February 2023: Observations on Planning Application for development, Land rear of Meadow Way

3. Groundwater

3.1 The site investigation revealed that groundwater is at a relatively shallow depth which with normal seasonal variation in groundwater levels means that the use of soakaways and infiltration basins would not be feasible.

3.2 The applicants have acknowledged this and have therefore proposed a drainage system comprising a number of attenuation (also known as balancing) ponds with a final discharge to local ditches.

3.3 There is a moderate risk of groundwater flooding and if the houses are constructed with finished floor levels above ground level the risk of internal property flooding would be minimal. However, if the groundwater level did rise to a level where the ditches became filled with water the proposed surface water drainage system would be compromised. It is probable that the current flooding of the A29 and other local areas is linked to groundwater issues.

3.4 The application does not take any account of this and particular how the site would be adequately drained during periods when there are high groundwater levels.

4. Surface Water

4.1. General Principles and Watercourses

4.1.1 The general principle of the surface water drainage system comprises a total of 3 attenuation ponds with two located centrally within the site and a larger one in the north-east corner of the site. The two central attenuation ponds would be on-line ponds with the outlet discharging to downstream pipes in the drainage network. All the surface water will drain to the larger pond in the

north-east corner which will then discharge at a controlled rate into the drainage ditch on the northern side of the development.

4.1.2 The surface water drainage system is only designed and intended to drain some of the roads and roof areas. It is not intended to drain all the roads and none of the car parking areas. Some of the roads and all of the car parking areas are designed as having permeable pavements but the submitted drainage plans are incomplete and are inadequate to show what areas are drained by the positive drainage system and which areas are intended as permeable pavements.

4.1.3 The Drainage Strategy report states (paragraph 2.21) that the permeable pavements will need to be lined. It is therefore not known how the applicant intends the permeable pavement areas to be drained as the 'lining' will prevent them from operating as permeable pavements.

4.1.4 The surface water drainage system as currently designed is therefore inadequate to drain the whole site

ANP Policy GA2 – Footpath and Cycle Path Network

The loss of existing footpaths will be resisted, and it is still not clear from the application whether PROW 299 (the section between Hook Lane and Meadow Way) will be left as an unlit footpath, or whether the intention is to widen it to a cycle path with additional lighting. This is also referenced in the Decision Notice on AL/50/24/RES and has still not been answered.

The parish council, and residents, will vigorously oppose any widening or additional lighting of the footpath given that the long native hedgerow that separates the site from the path provides an important habitat for nesting birds. It has been proven by ecologist surveys to be used by foraging and commuting bats, including the rare Barbastelle bat. Parish Councillors and residents have recorded stag beetles and slowworms on and adjacent to the footpath

ANP para 5.2 - Energy efficiency and climate change

The updated paragraph 163 of the NPPF requires that, in assessing planning applications, "the need to mitigate and adapt to climate change should also be considered, taking into account the full range of potential climate change impacts". This objective is in line with the multiple statements by Arun District Council with regards to the impending climate emergency, the importance attributed to it in the Local Plan (in particular policies ECC SP2 Energy & Climate Change Mitigation and ECC DM1 Renewable Energy), and the consequent inclusion of considerations of energy efficiency in part K of the Arun District Design Guide SPD.

According to this last document, "All new development must be designed to reduce energy demand and carbon emissions in line with national and local standards including the Arun Local Plan. Approaches to design must demonstrate that each step of the energy hierarchy has been followed whilst also ensuring the incorporation of low and zero carbon (LZC) technologies and clear commitments to comprehensive energy monitoring and transparency of performance."

Nonetheless, it is difficult to find in the documents provided by the applicant any mention of climate change or indeed energy efficiency, making it clear that this aspect has not received the consideration it deserves in the current trying circumstances. There is no evidence that the design, placement and orientation of the dwellings maximise daylight capture and natural ventilation conditions, nor are we given details about the nature and energy properties of the glazing, wall and roof insulation, or passive heat & power generation throughout the development. This absence of positive evidence must induce officers and councillors to consider this development inherently unsustainable unless and until proof to the contrary can be produced by the applicant.

ANP Policy EH10 – Unlit Village Status

Not addressed in this application.

ANP Policy GA1 – Promoting sustainable movement

The policy requires that new developments will be supported only when they are located in places accessible to community transport or actively contribute to the promotion of sustainable movement. To argue the point, the applicant lists a series of amenities and services and their distance from the promoted development, as evidence of their alleged ease of access without recourse to car journeys. Unfortunately, the information is incorrect and outdated, as there is no local pub anymore, the only new shop in the vicinity of the proposed development is still not guaranteed, and the schools listed by the applicant are already oversubscribed and have been for several years now. Therefore, it is the opinion of this parish council that this development must not be considered to be "sustainable" or "promoting sustainable movement", as any one of the basic needs arising from the occupation of the planned dwellings could be satisfied only in conjunction with additional car trips, adding further pressure to an already strained transport network, and increasing the levels of air pollution in the areas of Meadow Way and Westergate Street.

Ecology

It is noted that the site has now been left fallow for some considerable time and there has been no updated reference made to the additional impact on wildlife that not cultivating this area has had on the local wildlife population which has increased exponentially. The most important impact over this period is likely to have been upon reptiles - the ecological report for the original applicants at outline stage found a large number of adult slow-worms and a juvenile grass snake, but that was carried out over three years ago.

A29

The parish council still cannot stress enough that it is felt that again with all the developments in the area that the A29 re-alignment should be in place before any developments are started as a condition precedent. The parish council has previously provided a Transport Report alongside its original objection to this development and advised of the considerable changes that had taken place with Southern Railway issuing a new timetable. This impact on traffic has still not been addressed.

Yours sincerely

Marie Singleton
Parish Clerk /RFO