



M Burton
37 Oak Tree Lane
Woodgate
Chichester
PO20 3GU

Arun District Council
Planning Department
Civic Hall
Maltravers Road
Littlehampton
Dear Sir,

Planning Application AL/72/2019

I write to request this second planning application, by Turnball Ltd, with regards to a development on land adjacent to Ryefields Farmhouse, Woodgate, be refused.

The proposed dwellings are neither a suitable design nor as 3 and 4 bedroom houses are they required in the area. Local surveys show there is a need for 1 and 2 bedroom 'starter' houses.

The site appears too small for the proposed number of dwelling which look nothing like the current housing stock. They will not 'blend in' but rather 'stick out' like a badly thought out addition.

The need for future housing stock in the area is already included in the local area Master Plan further individual, speculative construction, of this type, is neither required nor wanted The application is premature in terms of the detailed master planning and delivery of the Barnham/Eastergate/Westergate (BEW) strategic allocation (SD5)

Access to and from the site, as well as access and egress onto the A29, is not suitable. It does not offer pedestrian or disabled access for the distance between the end of Oak Tree Lane and the entrance/exit from the proposed site.

The redefined egress/exit from the proposed estate is not, as described in the planning application? It is not onto Oak Tree Lane, but rather onto an unmade trackway known as Reeds Lane. Reeds Lane adjoins the end of Oak Tree Lane to the west of the proposed site. The current gateway to the proposed site is situated on Reeds lane, approximately 25m from the end of Oak Tree Lane.

It is important to make the above distinction in that Reeds Lane, a section of which traffic will need to traverse is a private road. I believe it is the property of The Church Commissioners. The section of Reeds Lane which traffic to the proposed estate will need to traverse is currently narrow allowing only one vehicle to traverse it. It will need to be suitable upgraded in order to provide adequate

access; there appears no mention of this in the planning application? Oak Tree Lane is also a private road, the upkeep and maintenance of which is paid for by the residents of Oak Tree Lane. Any work involving Oak Tree Lane must be with the permissions of the management company for this road, Hadleigh Gardens management Company Ltd.

As a Director of Hadleigh Gardens Management Ltd, the maintenance company for the Oak Tree Lane estate and a Director of the Oak Tree Lane Resident's Association I can say that neither of the above entities have been contacted by Turnball Ltd, or anyone else, to discuss either rights of way, construction access or contribution towards the upkeep of Oak Tree Lane. There would appear to have been no consultation with anyone regarding the proposed planning applications.

As suggested by the Planning Officer the developers could provide better and safer access and egress by awaiting the Area Master Plan development to commence thus providing them with a direct route eastwards out onto the proposed new by-pass.

Oak Tree Lane is unsuitable in that it is a narrow residential roadway, with two 'blind spots', where parking is already a problem. In recent years there have been at least two incidents where ambulances have been unable to gain access or subsequently been able to turn around and there have also been a handful of minor accidents.

I would submit that the proposed site does not provide a suitable number of parking spaces. This is likely to result in additional vehicles being left on (Oak Tree Lane), increasing the possibility of further incidents and accidents as described above. It would appear, in light of the above points, that section 8 of the planning application form could be viewed as being incorrect?

In this application Turnball Ltd state that the site in question,

"...can be developed independently without effecting the illustrative Master Plan and aim to provide much needed additional units to the Borough"

Obviously this area is not a 'Borough', secondly and of far more importance I am appalled by the statement and suggestion that Turnball Ltd regard this application as having no effect as to be independent of the Master Plan (Barnham/Eastergate/Westergate – BEW). The relevance of this proposed development was highlighted in the very first sentence of the refusal for planning permission by the Planning Officer in dealing with Turnball Ltd's first application (AL/118/AL/OUT). The Officer stated:

"The proposed development is premature in terms of the detailed master planning and delivery of the Barnham/Eastergate/Westergate (BEW) strategic allocation (SDS)."

Equally galling is the statement by Turnball Ltd that they are providing "much needed additional units..." Turnball Ltd have obviously only paid 'lip-service', if that, in contacting local residents and the Parish Council, otherwise they would know that the area is in need not for the proposed 3 and 4 bedroom houses but 1 and 2 bedroom 'starter' houses.

The proposed site is adjacent to land where two previous applications to erect houses have been refused. AL/106/12 and AL/68/11. These applications were refused, for having a low level of sustainability regarding transport modes and importantly the proximity of community facilities and access onto the A29. I would submit the same points, with regards to this application, are relevant due to the close proximity of the sites.

Our local schools are all full. This would therefore involve travel of new residents to either Bognor or Chichester for schooling. Bus services in the area are inadequate this would therefore involve an

increase in motor vehicle travel. Likewise employment would also require travel outside of the local area. Such journeys should be regarded as unsustainable.

The local doctor is oversubscribed and there is no local NHS dentist. Again unsustainable travel would be involved to cater for these.

The plans submitted show the 're-working' of the egress and exit to the proposed site onto Reeds Lane. The submitted plans do not appear to provide pavements for pedestrian or disabled access from the end of Oak Tree Lane to the proposed site. The plans also appear to show use of the verge of Reeds Lane, to accommodate the egress and exit of vehicles. This land (the verge to the southern side of Reeds Lane) I believe is outside the development site.

I also wish to raise concern over this developer's answers in the planning application with regards to Section 12. 'Biodiversity and Geological Conservation'. I would submit that this entire section has been incorrectly answered together with various corresponding questions on ARUN's Biodiversity Checklist and would refer you to the survey carried out by Lindsay Carrington Ecological Services. (LCES)

LCES conducted a survey regarding Bats and other creatures and submitted a report which is attached to this planning application. It would appear the findings of this survey, which I believe are very limited, have been ignored by the applicant who has answered in the negative to the question included in section 12. I would submit that questions a) and b) should have both been answered "Yes on land adjacent to or near the proposed development".

Having read the report I am concerned and therefore bring the matter to your attention, that the survey report appears to have been based on just one site survey, conducted on the 15th January 2019 (mid-winter), and in consequence is based upon a number of 'desk surveys. In the first instance I would suggest several of these 'desk surveys' could be regarded as somewhat historic and therefore irrelevant. Secondly the date of the site survey was the 15th January 2019 (mid-winter). Is a survey, conducted for creatures, many of which would be in hibernation (bats, snakes and dormice) of relevance at this time of year?

The report concluded there was no evidence of bats roosting in buildings on the proposed site it does however mention the possibility of bats tree roosting in the area but offers no details of any tree survey. It acknowledges the existence of several roosting sites of the Western Barbastelle bat within 2km of the proposed site and that this was judged important in that 'Western Barbastelle' bat has a core sustenance area of 6Kms. It also acknowledges that the Western Barbastelle bat is a tree roosting bat and prefers to roost in 'ancient' trees.

The Tree Survey also submitted with the application for this site concludes there are a number of ancient trees in the area, especially along Reeds Lane, which I would suggest could be seen as bat roosting sites.

The bat survey report highlights that the roadway to the north of the proposed site, Reeds Lane/Oak Tree Lane, was thought important as a potential commuting route between existing habitats and food sources due to the lack of lighting. The survey report concludes:-

"However the lighting of the road could contribute to the accumulative loss of commuting routes within the wider landscape"

"All bats are naturally light adverse and consideration of light levels and placement will be required to ensure that the bat species identified are not adversely affected. It is important that the bat

species within the local area are not dissuaded from existing commuting routes and foraging areas that would contribute to a loss of natural range"

Whilst I am not an expert with regards to bats I would wish to say that I am surprised a survey, for the existence of this reptile along with other reptiles (grass snakes and adders and dormice), was conducted in the middle of mid-winter when I believe the majority of these creatures hibernate. I have some concern that such an important survey would only warrant one visit to the site and that the subsequent report seemed to be mainly based on 'desk surveys', many of which appeared historic.

Whether Oak Tree Lane/Reeds Lane is a habitat in its own right or just a commuting route for bats I believe should be properly explored and not just based on one visit. Regardless bats are seen in the summer months on most nights usually in pairs but also in small groups.

In conclusion therefore I believe the survey and report tendered by Lindsay Carrington Ecological Services is as best based upon outdated/irrelevant evidence. The site survey, comprising of only one visit and being conducted in the middle of winter, would in itself be insufficient not only to establish the presence of Bats but also many of the other creatures mentioned in the report.

In conjunction with the above I see nothing in this planning application concerning proposals for street lighting or the management of light bleed/light pollution from the proposed dwellings in respect of the recommendations by Lindsay Carrington Ecological Service.

The protection of wildlife and the natural habitat should be a priority concern for us all, it is incumbent, especially on planning authorities, that protections be not only considered but solution guaranteed before any development takes place and if necessary planning refused.

In all respects, as stated by the Planning Officer in his refusal of the previous application (AL/118/18) this application is premature in terms of the detailed master planning and delivery of the local (Barnham/Eastergate/Westergate) strategic allocation.

Yours faithfully

M Burton

