

**Aldingbourne Parish Council**

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

19 September 2024

Dear Mr Davis

**Application AL/89/24/OUT – Land at Woodgate Nurseries, Lidsey Road, Woodgate.**

**Outline planning with all matters reserved (except access) for the demolition of existing redundant nursery buildings and other structures and erection of a residential development of with up to 130 No dwellings, informal and formal public open space, landscaping, drainage, and other associated works. This application may be a Departure from the Development Plan.**

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

ANP Policy EH1 – Built Up Area Boundary (BUAB): this development is a departure from the development plan, and proposals of land located to the west of Westergate Street and outside of the BUAB will not be supported.

ANP Policy EH2: Green Infrastructure and Ecosystems services. New development within, or immediately adjacent to the Biodiversity Corridors will need to clearly demonstrate that development proposals will not give rise to any significant harm to the integrity or function of the Biodiversity Corridor.

ANP policy EH5 – Surface Water Management. The Parish Council notes the objection by the West Sussex County Council (WSCC) Flood Risk Management Team dated 5<sup>th</sup> September 2024, which states:

*“We object to this planning application in the absence of an acceptable Flood Risk Assessment (FRA) and Drainage Strategy relating to:*

*The application is not in accordance with NPPF, PPG Flood risk and coastal change or policies in Arun local plan”.*

The Council commissioned a Hydrology report on this issue in relation to a separate application not far from the site (Land to Rear of Meadow Way, AL/178/22/OUT), and considers that that the general conclusions of this report, that further development in the south west of the parish will only serve to increase the existing groundwater flooding experienced each winter, apply to this application too, as the serious problem of surface water management throughout the parish has not been resolved. New developments within areas at risk from flooding should not be permitted

unless they are supported by a site specific Flood Risk Assessment which provides clear evidence to demonstrate that the proposal would not give rise to additional risk of flooding either to the development site or to other land arising from the carrying out or use of the development and would make appropriate provision for accommodating the surface water and foul water arising from the development.

ANP Policy EH10 – Unlit Village Status, there does not appear to be any mitigation in place to ensure that this policy is adhered to.

ANP policy EH12 - Protection of bat habitats – please see Appendix A below.

ANP Policy H1 – Provide housing to meet the District Council’s allocation. The provision of housing to meet the District Council’s allocation has been exceeded considerably despite Aldingbourne Parish Council having complied with policy H SP1 of the Arun Local Plan for non-strategic sites. It further reiterates that permission will only be granted as per H1.3.2019 if occupation is phased to align with the delivery of sewerage infrastructure. Along with other applications recently objected to within the parish, it is felt that this has not been resolved. 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 and would require this as a condition precedent of the development.

ANP Policy H3 – Housing Density – the parish council views this application as an over development of the site with up to 130 dwellings being considered.

Transport infrastructure/A29 – The Parish Council 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 provided a Transport Report on a previous development that is still relevant to this application, and since then there has been considerable changes. Southern Railway has this year issued a new timetable which is already causing an increased build-up of traffic in the vicinity of the application site, as the crossing is now closed more often than indicated in that report. The parish council requests that a new traffic survey should be undertaken to reflect the new timetable changed. There has also been a substantial increase in traffic along the A29 from the new distribution/retail centres that are now in operation.

We wish to reiterate that developments should not be taken at face value on an individual basis, as each new application adds even more pressure to the current infrastructure.

Education - Parents in the parish are already experiencing significant difficulties in obtaining both primary and secondary school places for their children. If this application is granted it will only compound these problems. We note WSCC Education’s objection to the application, dated 27 August 2024, on the basis that, ‘The existing secondary school provision is unable to expand, and the lack of an allocated or secured site for a new secondary school means that this new education facility cannot be relied on in the short-term. Consequently, the County Council as LEA objects to the planning application listed above for the reasons set out above’.

New Bus Routes – this development will completely rely on vehicles for any journey as there are few facilities genuinely within walking distance, it is therefore imperative that consideration is given to the needs of additional bus services to allow residents to access education and doctors etc.

Provision of public open space/leisure facilities - if Arun District Council is minded to allow this application, the parish council wishes consideration to be given to the provision of allotments and a

Community Space for Gym and Leisure facilities when the S106 agreement is being negotiated, following the permanent closure of the community gym earlier this year at Six Villages Ormiston Academy.

We also note that the Aldingbourne, Barnham & Eastergate Community Land Trust has not been consulted and it is imperative that they are part of any discussions as they have a waiting list for local people and there is much need for more affordable housing.

This development is also close to the site of an Ancient Monument (Tote Copse) and any archaeology implications must be discussed with the District Archaeologists.

Yours sincerely

Marie Singleton  
Parish Clerk /RFO

## **APPENDIX A: BIODIVERSITY CONCERNS**

One of the Core Objectives of the Aldingbourne Neighbourhood Plan is to *'Protect and enhance the Parish's biodiversity'* (ANP 4.2.2(c)). The parish council is concerned that this application will instead further significantly diminish the Parish's biodiversity, despite the various mitigation measures proposed in applicant's submitted Ecological Impact Assessment (EIA).

The council has concerns over the impact of the proposed development on bats, slow-worms, hedgehogs, bird species and badgers.

### **BATS**

The site falls within the Singleton to Cocking Tunnels Special Area of Conservation (SAC).

The council notes that the surveys for the applicant described in the EIA identified the presence of eight species of bat. This is as many species as have previously been found in the whole of the parish, and included Western barbastelle's, serotines, Nathusius pipistrelle and Leisler's bats, of which the former two are regarded as 'vulnerable' in England, and the latter two as near threatened.

It further notes with concern that the EIA states that,

*"The proposed development has potential to result in disturbance to commuting and foraging bats, both during construction and in the long term after completion, particularly through increased artificial lighting, which can disrupt commuting corridors"* [EIA, s4.3].

The council is not satisfied that the mitigation measures proposed in the application, such as bat boxes and some low-level lighting, will sufficiently protect from harm the bat species found to be present.

### **SLOW-WORMS**

The Parish Council is concerned to note that 44 adult slow worms were detected in surveys for the applicant at the site, including 19 in a single survey on 14/7/21. As the EIA states, Froglife Advice Sheet 10 from 1999 classes this number as a 'good' population, but the figure is very close to 'exceptional' status, defined by the Advice Sheet as any number over 20 identified on one day by one person.

It notes with concern the EIA's statement that,

*"With regards to reptiles, in the absence of mitigation, the proposed development has potential to result in loss of habitat, killing, injury and disturbance during the construction and operational phase"* [EIA, s4.8.1].

However, the council is concerned that the mitigation measures proposed by the applicant, essentially to catch any slow-worms and release them elsewhere, are not practicable as there is now so little suitable land in the vicinity of the site, given that so much of it has recently been either built on or consented (the two sites to the south comprising AL/129/21/OUT and AL/70/23/OUT, plus AL/20/21/PL Land at Wings Nurseries and AL/21/20/OUT Land North of Lees Yard).

The council is not convinced that the slow worms at the site will not be harmed by construction activity and thereafter.

### **HEDGEHOGS**

The EIA cites 33 records of hedgehogs in the search area from the Sussex Biodiversity Records Centre (SxBRC) and states that,

*“The development of the site will result in the loss of potential habitat for hedgehogs (a species of principal importance for nature conservation (Section 41 NERC Act 2006)), though the features of greatest value (the boundary hedgerows) will be retained. This habitat loss will be temporary but could have a localised effect upon foraging habitat availability and would pose a mortality risk” [EIA, s3.11.3].*

Hedgehogs are one of our most threatened species, with the 2022 report ‘The State of Britain’s Hedgehogs’ demonstrating that populations have declined by between 30% and 75% across different areas of Britain since 2000 alone. In July 2020 the species was officially classified as vulnerable to extinction. The council does not consider that the proposed mitigations (EIA, 5.5.2) will be sufficient to safeguard any hedgehogs at the site.

### **BIRDS**

We note with concern the findings at the site of 18 species of breeding bird, of which four are red-listed and three amber-listed under Birds of Conservation Concern (BoCC), while 20 species of over-wintering birds were identified, of which one is red-listed and two amber-listed.

The parish council also wishes to point out that three members of the Council have recorded the cuckoo, a further, red-listed species, over consecutive years in trees immediately adjacent to the site to the west.

### **BADGERS**

The EIA states that information relating to badgers at the site is provided in a confidential Appendix 6 which must not be released into the public domain [EIA, s3.3]. We infer from this that badgers have been found at the site. If this is the case, no details of proposed mitigation have been provided in the EIA, which is a matter of concern to the council.

### **CONCLUSION**

Despite the application site having formerly contained horticultural premises, the fact that it has been redundant for some years has led to the wealth of species, particularly bat species, identified by the EIA. The parish council argues that the richness of biodiversity found, and the number of species red-listed, are grounds for refusal of the application