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Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton BN17 5LF

ARUN DISTRICT COUNCIL
TECHNICAL SUPPORT

31 JAN 2019

30th January 2019

Dear Mr Eastman,

Re: Planning application BE/135/18/PL

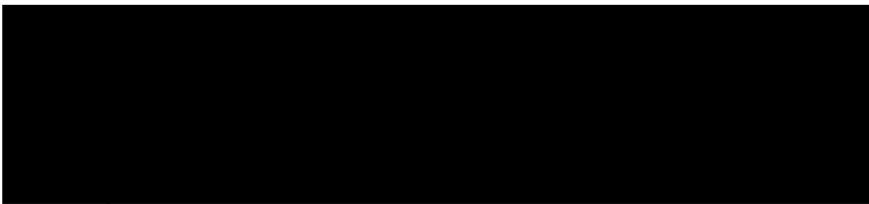
I have tried to submit my comments on the Salt Box Field Site on the online facility on the website. My response has a word count of 1,809 but it refused to load, giving me a red notice that there is limit of 3,800 words.

Therefore, I would be grateful if you could accept my objections by letter.

Please find attached a paper copy of my submission.

With kind regards,

Yours sincerely,



Joanna Wyatt.

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ACTION...

While I accept that planning permission has already been granted to this development and the plans for a Warburton's depot have been agreed, as a local resident I have a number of concerns/objections.

It is sad to lose such a large, Greenfield site of prime agricultural land in close proximity to the rural but residential village of Shripney. The two sensitive areas of the Shripney Manor Conservation zone and the Bersted Brooks LNR will suffer some significant environmental impact, as a result of this change of use. This development will require a number of mitigations and will be subject to the National Infrastructure Planning process (the planning Act of 2008)

The current application represents a departure from the original plan. It has been allowed to proceed outside the built up area due to its commercial status, offering employment and being part of the Bognor Regis Town Regeneration project. This development has enjoyed a favourable reception from Local Government as it will provide a significant income stream for Arun District Council.

This has always been a hybrid development scheme which is evolving in stages. Due to the loss of a sizeable grant of around £5million, initially sought from the Coast to Capital economic strategy plan, the site now has to change the nature of the businesses which it will accommodate.

A quality hotel, gym and other amenities which could have been an asset to the area will now be replaced by sizeable retail outlets.

I am concerned that more business will be drawn away from rather than into the Town Centre. So, it is difficult to see its value as a regeneration project.

Plans have been submitted for an ALDI supermarket on site. My objection to this is that we already have numerous supermarkets on the local trading estates. LIDL will be relocating to a site directly opposite Salt Box. In addition to Sainsburys and Tesco we already have many discount stores-B&M, Home Bargains, Matalan, Dreams and Ponden- all within a small radius.

Added to this there will be two more fast food, drive through outlets. We already have enough of these locally. This type of food retail is simply not in line with current Government health advice.

I object to the risk of increased foot fall, traffic congestion and diesel HGV lorry trips which the change of businesses on the Salt Box site will generate. As it is, this area already suffers from major traffic problems due to the recent opening of the Bognor Bypass.

There is worse to come with surrounding areas of mass house building and road developments. If the new A29 goes ahead it will dump all the through traffic onto the existing road at Shripney. There will be a significant risk of total gridlock on the roads.

At the recent (and only) presentation of this planning application to Shripney residents by Paul Hanson of Langmeads Investments/Landlink Estates, many residents were understandably concerned about the potential, knock on effect of this development on the local area.

- We need to ensure good practice and effective mitigations are put in place. Given the sensitivity of the site, monitoring before, during and after construction must be carried out. This is a speculative plan and at the present time the supporting documents state that there is a shortfall of finance available for the provision of necessary infrastructure.
- Land drainage and flood risk issues.
The E.A. flood risk map for my post code, close to the Salt Box Site. Shows most of the site as being in flood risk zone three, coloured dark blue with some smaller areas of zones one and two in pale blue or white. This map includes all the data for the various causes of flooding. The SFRA map for the same area for developers/planners shows the removal of most of the flood risk zone three from the Salt Box Field site. According to the E.A, surface water flooding and high ground water levels are frequently occurring here but both sets of data are omitted. Also excluded are the effects of the tidal movements on ground water levels.

Geographically, the flat coastal plain here is close to sea level and the groundwater is high-up to the land surface, in wet weather. The flat farmland is an old sea bed. The area surface deposits are of alluvial silts and gravel over brickearth, a clay deposit of the Pleistocene era, once used for brick making. This overlies a permeable chalk layer at greater depth. The development on this site will involve the sinking of extensive foundations down into the chalk.

- Objection: The chalk layer here is a primary aquifer. The subsoil is classed as a secondary aquifer. Caution is needed with the choice of construction methods penetrating down into this sensitive geology.
- Objection: While it is not illegal to build on flood risk 3 areas, it is to be avoided "except in exceptional circumstances."
- Objection: Tests show the surface deposits are not stable under vertical or lateral loading so deep foundations are needed. The groundwork surveys state that this area is not suitable for conventional pile driving due to the close proximity and risk to neighbouring houses of sustained noise and vibration. Instead, the use of Continuous

Flight Auger Piles is to be recommended. This method is more expensive but much safer.

- **Objection:** The ground work studies state that the superficial topsoil and clay should be compacted by heavy rolling to stabilise these layers under the construction of the concrete, ground floor areas. Unfortunately, this means that infiltration methods of drainage mitigation, such as the permeable hard standings as shown in the site plans around the Warberton depot unit, cannot be used effectively on the clay subsoil. There is also a caution in the use of attenuation ponds which states that an impervious liner should be incorporated. The site naturally slopes and drains towards the southwest, ground water could track off site –with a risk of flooding adjacent areas. An example of this type of problem was seen in the St. Ebba's development in the borough of Epsom and Ewell. A large attenuation pond leaked and flooded a residential area, a distance away, in Ewell.

I would add a note of caution that the comprehensive groundwork studies carried out from January 2018-January 2019 have taken place through a period of unusually sustained, hot, dry conditions.

Also, please note that there is similar development planned on Oldlands Farm, opposite the site. So, the risks to local land drainage of the Salt Box site works cannot be assessed in isolation from its surroundings.

The ground surveys into the geology, geography and archaeology of the site are thorough and interesting. I really hope this work will inform the construction process. I understand the Mesolithic, Iron Age and Romano British finds are to go to the Novium Museum in Chichester. Perhaps some information and artefacts could also go to the local Bognor Regis Museum?

- The construction period is due to start in May 2019.
- **Objection:** We have been warned that there will be at least two years of noise disruption between the hours of 7am – 6pm weekdays and 8am-1pm Saturdays and Bank Holidays. This will have a significant effect on local residents. The construction periods are likely to extend as further on-site development takes place, in stages.
- **Objection:** Areas of existing hedgerow will be cleared and later replanted with native hedging. This work will fall in the middle of the nesting season of March to August. It is a legal requirement that the site must be searched by a suitably qualified person to check for nests. Any birds' nests found cannot be disturbed. The current hedgerows have a good deal of bramble in them.
- **Objection:** Brambles are a valuable source of nectar and pollen for native bumblebees and honey bees. They provide cover and food for a variety of wildlife and it would be good not to grub all of them up. The plans aim to replant by 2:1 any

lost vegetation but preservation of existing flora would be best. Sussex University L.A.S.I department has the latest research information on the value of native brambles as a preferred food source.

- The buffer zones for wildlife are clearly laid out. The largest will be on the northern part of the site, very close to existing houses. A sizeable bund is to be built up using topsoil.
- Objection: The detail on the width, height and effect on drainage here is not easy to find. The remaining buffer zones around the perimeter of the site look to be very narrow. Sussex Wildlife Trust has an advice leaflet on Landscape Buffer Zones which can be used as a guide.
- The British Trust for Ornithology has records of Turtle Doves in the adjacent hedgerows and field margins in this area. This species is on the red list for possible extinction. It would be great if the wildflower areas could include the sowing of specialist seed to support this species. The BTO has advice on this for landowners.
- The provision of wildlife corridors is promised, which is great as the site borders onto the Bersted Brooks LNR. The security and noise reduction fencing needs to have access gaps for the safe passage of the rich fauna found here.
- Objection: The site will undoubtedly cause noise and light pollution in a currently dark, rural setting. The current gap between the built up area and the countryside will be drastically reduced. The businesses will need 24/7 illumination.
- Objection: There will be loading and unloading throughout the night and it is also a security issue. The specifications for stand alone and wall lights are designed to mitigate this problem but, as can be seen at the adjacent Rolls Royce site, this type of lighting is still very bright.
- If an ALDI supermarket comes to the site, it will need to be in a low rise building, in keeping with the original site plans. Objection: Illuminated signs should be discouraged here.
- Objection: Litter from supermarkets and fast food outlets, is already a nuisance along the Shripney Road and Shripney Lane. The businesses now planned for the Salt Box Site are likely to add to this problem.
- Objection: This site will create a relatively small number of modestly paid jobs. It will not be possible to advertise for or only recruit local people to these jobs as this would be a form of discrimination which is not in line with the 2018, 2019 employment legislation. I hope that continued monitoring of the risks associated with this development, the encouragement of best practice and better communication with local residents will achieve the best possible outcome for the loss of this substantial and historic Greenfield site.