

Ms Amy Myer
Planning Officer
Arun District Council

Dear Ms Myer

Please find below my comments and objection to the planning application BN/128/19/OUT for the proposed development 70 bed Care Home and 14 Assisted Living bungalows with associated car parking, landscaping and access - Departure from the Development Plan.

Departure from the Local Development Plan

We object to the proposal based on the fact that it is a departure for the emerging local development plan (LDP). LDP's are designed and put in place so that sustainable housing numbers and locations for the district are planned in advance. As such this application should not be supported.

Policy GEN2 which specifically states that outside the built up area boundaries of which this site is, development on this agricultural field should not be permitted.

Arun's Draft Local Plan strategic objective for housing is:

"To plan and deliver a range of housing types in locations with good access to employment, services and facilities to meet the district's housing requirements and the needs of Arun's residents and communities both urban and rural, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed."

The following areas have been identified as strategic locations for growth in the district during the life of this Local Plan.

Emerging Policy SP8 - The villages of Barnham, Eastergate and Westergate.

The 2000 -3000 housing allocation has already been made and therefore this site should not be included.

Policy GEN3 seeks the protection of the countryside which this agricultural field sits within.

We object on the grounds that the site is not part of this local plan is in conflict with Policies GEN2 and GEN3.

Local Neighbourhood Plan

The Barnham and Eastergate Neighbourhood Plan (BENP) has been adopted (July 2014) and did not define this site for housing.

The BENP reviewed the site (as it did all sites in the Parishes) and agreed with the findings in the SHLAA (Strategic Housing Land availability Assessment) that: Site SHLAA 129 *“This site is not adjacent to a study settlement, is poorly related to facilities and therefore not in a sustainable location for housing development”*.

Therefore this site should not be considered for development.

Local infrastructure

The proposed development shows a lack of appropriate facilities suggesting reliance on cars to access local infrastructure such as shops, schools, doctors etc.

Within Policy SP8, the following requirements must be addressed as part of any planning application:

Community infrastructure, including sport and health facilities, employment opportunities, community facilities, open space, transport and utility shall either be provided and/or a contribution made towards the costs of providing these services and facilities and address primary and secondary school place requirements and provision.

Currently, this planning application does not provide details to support Policy SP8 as set out above and has not even provided any information about contributions to costs.

Amenity value, visual and green infrastructure

Currently, we have views of the South Down hills. This area of Yapton Road is semi-rural in nature. The development plans show 2 storey developments with elevated roof pitches. These are particularly high and not in keeping with the local housing style. Ultimately the proposed development will completely block our view of the South Downs. A Landscape visual Impact Assessment has not been submitted as part of the application that effects properties along Yapton Road.

Visually, the development is out of context with the existing development along Yapton Road.

Transport

Existing transport conditions, local highway network and sustainable travel.

The local highway network includes the B2332 to the south of the proposed development. This is a two single carriageway with a 30 mph speed limit. However there are no traffic calming measures apart from one 30 mph sign towards Murrell Cottages.

The lack of facilities within the development and on Yapton Road suggest reliance on car use at this development. This will increase the traffic numbers and congestion along this busy road. We would encourage that WSCC Highways to be consulted and comment on this additional load.

Barnham School is approximately 1.5km distance from the proposed development. The current footpath is poor and not wide potentially creating a hazard for walking. I regularly experience this when I take my children to school. Again due to the distance, there is a reliance on car usage if families are based at this development.

The additional traffic on a road that will service the developments already given permission at Garden Crescent extension and Angels & Hyde Nursery, Poplars as well as the Lake Lane and BEW sites has not been considered or even studied, especially as there is a height restriction on the road at the rail bridge. We recommend that the developer and indeed Arun District Council in conjunction with WSCC Highways needs to address this future cumulative impact.

Even though it is a 30mph zone, cycling is not particularly safe as there are no traffic calming and slowing measures along the road. Though we must encourage cycling, if the development is granted we recommend that additional traffic calming measures are included along Yapton Road and paid for out of the development (s106 agreement).

Though the development traffic assessment has indicated an increase on 1.8%, overall this busy road has seen a marked increase in traffic with developments in Barnham and Yapton over the last 5 years and the overall increase is set to get bigger with other developments such as the Angle & Hyde Nursery and Poplars development. Therefore the aggregated increase in traffic numbers needs to be taken into consideration and the % increase overall will be much larger.

Cumulative impacts of approved development on Yapton road.

The local infrastructure and amenities, including doctor surgery and Barnham School are already at or beyond designed capacity and have been for some years now. Arun District Council and WSCC need to address this particularly with the additional housing as detailed above which has already been given permission. As additional development puts more pressure on oversubscribed facilities and is therefore considered unsustainable.

We object on the grounds of significant cumulative development impacts, particularly on local infrastructure, grounds of inappropriate development in the countryside.

Foul and Surface water provision

Foul Water

The infrastructure in terms of Sewerage Treatment Works are at or beyond designed capacity within the Barnham area.

The Barnham sewer network is at capacity and there is a high risk of pollution risk to the water environment. During the winter months, Southern Water has put interim measures in place including tankering waste from the existing sewers to alternative wastewater treatment works. This is not a sustainable sewage management option and a longer-term solution is needed.

The current situation has been caused by both surface and groundwater entering the foul sewer system at times of high rainfall. This overloads the sewer pipes and causes sewage to spill out of manholes into local watercourses and fields, particularly at Tars Farm along Church Lane.

We request that the application is not decided until the provision of foul water drainage is determined and agreed with Southern Water and/or Arun District Council.

If connection to the foul sewer is not available, the applicant has to consider an onsite treatment. If this is the case then the flows generated from the development may require a large area for foul water infiltration and this has not been considered in the proposal. Any private discharge to ground would require an Environmental Permit from the Environment Agency and may not be granted. There is insufficient information to fully assess the overall proposal.

As the site lies on predominantly London Clay, permeability is low and infiltration via soakaways will be limited (similar to surface water infiltration). Therefore a drainage field may be required. As the development is for 70 bed care home and 14 assisted dwellings, the potential number of bedrooms within the application equates to 84 persons. British Water "Flows and Loads" Version 4 Code of Practice recommendations on this number equates to some 12.6 m³/day (150 litres per person per day). This may require a large drainage field for infiltration and as such, the development plan does not cater for this area. In addition to this, if a private treatment facility is required, an Environmental Permit (EPR 2016) from the Environment Agency would be required for this volume into or on to land. As part of the treatment facility, a management system would be required for inspection and maintenance. The Local Authority will need to understand whether this will be undertaken by a private management company.

Policy GEN9 states the following:

Policy GEN9 Foul and Surface Water Drainage

Planning permission for development which will materially increase foul and/or surface water discharges will be refused unless the Local Planning Authority is satisfied that either adequate drainage capacity exists or appropriate drainage capacity can be provided as part of the development. Consideration should also be given to the use of Sustainable Drainage Systems (SuDS) as alternatives to conventional drainage where appropriate.

We consider that at present, further development in Barnham which increases flow to the sewer network is unsustainable due to restricted capacity and will result in further deterioration in water quality. In addition to this, if onsite treatment is considered, insufficient area and no infiltration calculations have been provided with the application to determine whether this would be acceptable means of foul water discharge. We request that the application is not decided until the full provision of foul water drainage is determined.

Surface Water Drainage

The site does not have any surface water courses in proximity to the site. The application has failed to undertake the basic walkover assessment to identify whether one exists or not. This shows that the applicant has not even prepared a basic environmental assessment to address surface water drainage for the proposed development.

In addition to this, connection to the mains sewer for surface water will be limited if not likely to be refused due to flow pressures on the surface water and foul water networks in Barnham. It is therefore likely that surface water will have to be managed on site. This will

involved surface water attenuation and soakage in to the ground. At present the drainage strategy is to develop a SUDs system using attenuation tanks for roof water and permeable pavement designs from roads and driveways.

The site lies on London Clay which has very low permeability and infiltration potential. We are also aware that the site does flood in extreme conditions as happened during the winter of 2013/14 and in subsequent years. In fact the eastern boundary of the site next to the footpath is under water. Therefore it is recommended that prior to determination, the applicant carries out a thorough drainage strategy, including relevant infiltration assessments to understand whether the area can support this development proposal. If this is carried out under relevant planning conditions, any problems that arise may not be able to be resolved due to the problematic ground conditions.

If the development is approved, Infiltration rates for soakage structures must be based on percolation tests undertaken in the winter period at the location and depth of the proposed structures. Any infiltration drainage design must include adequate winter groundwater monitoring data to determine the highest winter groundwater table. However as the site lies on London Clay, the groundwater table is likely not to be determined.

Whilst we should support sustainable urban drainage (SUDs) schemes, no information has been presented on any proposed measures which should include pollution prevention of the water environment. Any SUDs scheme at this location will have to include treatment train principles of the highest design specification so that water quality discharges in to the ground are of the highest quality.

We object on ground of insufficient information on the surface water drainage proposals. The site does not support adequate geological conditions for development and could increase localised flooding.

Recommendation: A Surface Water Management Plan or equivalent study prior to any planning permission is granted should be completed within the area to reduce flood risk and infiltration and increase capacity in the local sewer network.

Maintenance and Management

Maintenance and management of any private system is required for foul and surface water discharges.

Details of the maintenance and management of the surface water management system for this development must be set out in with any application and included in a site specific maintenance manual. No document has been formally submitted.

Conclusions

We object to the proposed development on the following grounds:

We object on the grounds that the site is not part of this emerging local plan and is in conflict with Policies GEN2 and GEN3.

We object on the grounds of significant cumulative development impacts, particularly on local infrastructure, grounds of inappropriate development in the countryside.

We consider that at present, further development in Barnham which increases flow to the sewer network is unsustainable due to restricted capacity and will result in further deterioration in water quality. In addition to this, if onsite treatment is considered, insufficient area and no infiltration calculations have been provided with the application to determine whether this would be acceptable means of foul water discharge. We request that the application is not decided until the full provision of foul water drainage is determined.

We object on ground of insufficient information on the surface water drainage proposals. The site does not support adequate geological conditions for development and could increase localised flooding.

Simon & Clare Deacon

Crediton
Yapton Road
Barnham
West Sussex
PO22 0BA