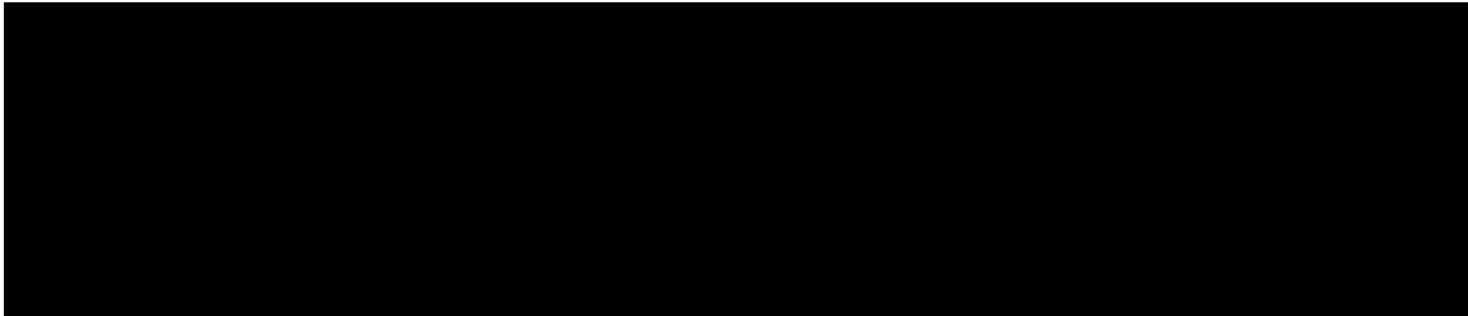




From: [REDACTED]
Sent: 08 June 2018 12:51
To: Planning.Responses
Subject: Re: FW: Representation on: CM/13/18/OUT at Land to West of Church Lane

Here is the attachment. Thanks Mandy.

I also attach an image of the acknowledgement I received when I submitted the objection. It clearly says that an attachment was uploaded. Is it just me that is having this problem? Is it me or is it the system?

Regards

Val

Mrs Val Knight
Clerk to Clymping Parish Council
33 The Ridings
East Preston BN16 2TW



<http://www.clymping.org.uk/>

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On 8 June 2018 at 12:40, Planning.Responses <Planning.Responses@arun.gov.uk> wrote:

Hello Val

I am afraid that I can't see it, perhaps you could re-send and I will forward to be scanned.

Kind Regards

Mandy

From: [REDACTED]
Sent: 08 June 2018 08:57
To: Planning.Responses
Subject: Re: Representation on: CM/13/18/OUT at Land to West of Church Lane

Thank you for this. Will you be including the attachment to this objection - it is not shown in the recorded response you sent me

Thanks

Val

Clerk, Clymping Parish Council

On Friday, 8 June 2018, <planning.responses@arun.gov.uk> wrote:

<http://www.arun.gov.uk>
DX 57406 Littlehampton
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--
Regards

Val

Mrs Val Knight
Clerk to Clymping Parish Council
[33 The Ridings](#)
East Preston BN16 2TW
[REDACTED]

<http://www.clymping.org.uk/>

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Clymping Parish Council - objection to planning application CM/13/18/OUT re:
Outline application with some matters reserved for the erection of up to 300 dwellings and ancillary development comprising open space, a building within use class D1 of up to 875 square metres net, a building for A1 use having a floor area of up to 530 sq. metres net, together with open space and ancillary works, including access points, car parking and drainage arrangements, with appearance, landscaping, layout; and scale wholly reserved for subsequent approval. The access detail, showing the points of access to the development, and indicated on Bellamy Roberts drawings numbered 4724/013 and 4724/005 Rev A are access proposals to be determined at this stage of the application. For the avoidance of doubt all other access detail within the site is to be determined as a reserved matter at a later stage. Resubmission following CM/1/17/OUT. Departure from the Development Plan.

Clymping Parish Council has considered planning application CM/13/18/OUT and has noted the inclusion of a controlled pedestrian crossing of the A259 which is a highway improvement that this Council would welcome. Council considers there has been little other change to the previous application CM/1/17/OUT and makes the following objection:

Clymping Parish Council strongly objects to this application for 300 new houses which will nearly double the number of residential properties and will have a dramatic, significant and detrimental effect on the nature of our parish.

Our Neighbourhood Plan recognised that small scale development may come forward in the future to meet demonstrated local housing needs, and the Plan allows for sensitive, appropriate, well designed proposals – but this is not small scale development. The reasons for our objection are:

1. **Clymping Neighbourhood Plan (CNP):** The application is contrary to the vision and objectives of the CNP and to the following policies within the CNP which are set out in full in APPENDIX 2:

CNP 7	Protection of Open Views
CNP 8	Protection of Trees and Hedgerows
CNP 9	Protection of Natural Habitats
CNP 10	Protection of high grade Agricultural Land
CNP 11	Quality of Design
CNP 12	Reducing the risk of flooding
CNP 13	Retain buildings or structures of character
CPN 14	Traffic and the Environment

The Clymping Neighbourhood Plan and the Character Assessment APPENDIX can be viewed at this link: <http://clympingnp.org.uk/clymping-neighbourhood-plan/surveys-and-evidence-documents/> or by visiting <http://www.clymping.org.uk/>

The application is also contrary to the saved 2003 Arun Local Plan Policy Gen 3 Protection of the Countryside

2. **Loss of Local Identity and Sense of Place** - It is important for the community that Clymping retains its distinctive character and sense of place as set out in our Neighbourhood Plan. The proposed site is on land designated as countryside and is in continuous use for growing arable crops. It is an important part of the rural setting of Clymping.
3. **Loss of Countryside and Agricultural Land:** The site is an area designated as both agricultural land and countryside. Protection of agricultural land is important to the sustainability of the area and to the country and is protected in CNP policy 10. The proposed site is a mix of Grade 1 and Grade 2 farmland. Local farming also contributes to the sense of

place felt by the local community. Protecting the countryside is important for its own sake and also for its provision of space for wildlife habitats and ecosystems. The views across the parish will be impacted on and the protection of open views is a policy in the adopted CNP.

4. **Loss of trees and hedgerows and Natural Habitat for Wildlife** – Loss of the agricultural land and trees and hedgerows will severely impact on the natural habitats for wildlife. Council suggests that the opinion of the Sussex Wildlife Trust is sought on this application as, in the opinion of Council, the surveys of protected species are deficient. CNP policy 8 seeks to protect the trees, woodlands and hedgerows that are an important feature in the generally open rural environment of the Parish and an important habitat for wildlife and plants.
5. **Design and adverse impact on the neighbourhood** – Council appreciates that this is an outline application but the layout shown will be visually intrusive to properties neighbouring the site and will also impact on the privacy of existing residents because of overlooking from the proposed new houses. Quality of Design values are set out in CNP policy 11.
6. **Detrimental to a listed Building** – Council is concerned that the proposal will have a detrimental effect on the setting of a Listed Building and this is referred to in CNP policy 13
- Retain buildings or structures of character.
7. **Risk of flooding** – Council is concerned that the application site is known to flood and is concerned that the underground water level is very high in this area and is not convinced that the storage ponds proposed in the application will handle the amount of surface water on the site or that the local ditch system will cope with an increase in surface water to be accommodated. Council is also concerned that the existing sewage systems and treatment sites will not cope with additional sewage produced by the proposed new housing. Any development of this site should prove before approval that the surface water and sewer management will be adequate to deal with this demand and that the problem is not solved by moving the flooding to another area in the parish. Further comprehensive tests and investigations should be carried out and the views of the Environment Agency and Southern Water sought once the results of the investigations are available. See further information in APPENDIX 1.
8. **Questionable Sustainability and Lack of Services/Infrastructure** – The near doubling of residential properties will significantly increase demand for local services such as educational and medical facilities in an area some distance from the district's main amenities thus this will make car use essential. There is only a small primary school in Clymping and there are no medical facilities. The extreme pressure on existing GP practices in this area of Arun District is well known. The application focuses solely on houses and is of questionable sustainability as it is on a site some distance from the main amenities and centres of employment in the District.
9. **Detrimental impact on Road Network:** The proposal will directly add to existing local road congestion along Church Lane and Yapton Road and the A259, and to the associated road safety issues.

The proposed access onto Horsemere Green Lane will create different traffic flows and a new set of hazards. It will encourage rat running through the proposed housing estate and on to Horsemere Green Lane by drivers avoiding the Oyster Catcher junction (Yapton Road/A259). It will significantly increase the volume of traffic using Horsemere Green Lane which is already overstretched and has hazardous junctions at each end of it (Yapton Road to the west and Church Lane to the east).

The development is essentially a dormitory housing estate from which residents will have to commute to places of employment and the main amenities of the District. The additional traffic will impact on the wider road network along the A259 and links to the A27. It is essential that a comprehensive assessment of the strategic and local road network, including the cumulative effect of this development and planned developments in the wider areas around our parish, be carried out before this development is considered for approval.

The outline application provides for a change to the roundabout at the junction of the A259 and Church Lane but the opinion of Council is that this will adversely impact on the already congested flow of traffic within the overall local network i.e. encompassing the A259, Horsemere Green Lane, Yapton Road and Church Lane, given that the volume of traffic will be significantly increased by this application. The local road network has frequent tailbacks already.

See further information in APPENDIX 1.

For the above reasons Clymping Parish Council urges that the application is refused.

Val Knight
Clerk of Clymping Parish Council

6 June 2018

Planning Application CM/13/18/OUT

Highways – additional comments

The Parish has considered its response to planning application CM/13/18/OUT which is defined as:

Outline application with some matters reserved for the erection of up to 300 dwellings and ancillary development comprising open space, a building within use class D1 of up to 875 square metres net, a building for A1 use having a floor area of up to 530 sq. metres net, together with open space and ancillary works, including access points, car parking and drainage arrangements, with appearance, landscaping, layout; and scale wholly reserved for subsequent approval. The access detail, showing the points of access to the development, and indicated on Bellamy Roberts drawings numbered 4724/013 and 4724/005 Rev A are access proposals to be determined at this stage of the application. For the avoidance of doubt all other access detail within the site is to be determined as a reserved matter at a later stage. Resubmission following CM/1/17/OUT. Departure from the Development Plan.

Although an Outline Application, the sentence highlighted above focuses consideration on highways matters. Map 1, that follows, shows that the area surrounding the application forms a discreet cell from a highways perspective. It is bounded to the south by the sea, and to the east by the river Arun. To the north, traffic flows are significantly constrained by the level crossings at Yapton (North End Road) and Ford railway station (Ford Road). Hold-ups here are sufficient for there to be environmental concerns arising from queuing traffic. The routes out to the west are through Barnham, itself the subject of major housing development that will constrain this route, or on the A259. This means that east/west travel is effectively limited to the A259, with its inadequate junctions and with the bridge over the River Arun which provides the only crossing point for the river between the sea and Arundel. Major housing or industrial developments in this constrained area impact the whole area.

Strategic scale housing developments are being considered both at Ford and at Yapton. The Grundon Waste Management Incinerator with its associated HGV traffic is a major industrial development that is approved but not yet implemented on Ford Airfield. West Sussex County Council have required all industrial traffic entering and exiting industrial facilities at Ford airfield to travel south the A259 on either the B2233 Yapton Road or on the unclassified Church Lane i.e. all through Clymping. The area already suffers from chronic congestion at peak times and this will only worsen as no additional highways capacity is planned.

Given this, CM/13/18/OUT therefore should only be considered as part of wider District level planning for infrastructure. Proposals that simply consider the development's immediate access and the local A259 junction are inadequate and may prove sub-optimal for the District as a whole.

Map 1.



Proposed Development CM/1/17/OUT



Level Crossing

Looking more closely at Clymping, Map 2 below shows the main trunk routes through the village for HGVs, buses and traffic to/from A259 and for travel either east or west along A259. It shows that the proposed development is surrounded by these major traffic flows and separated from all Clymping village's current amenities:

- the Church Hall
- St Mary's Church
- The recreation ground, children's playground and the Village Hall
- The westerly bus stop at Ferry Road
- The village's Church of England Primary School
- Clymping Beach and facilities
- The Hotel and Spa at Bailiffscourt
- The Black Horse Public House
- The Farm Shop
- The westerly bus stop at the end of Climping Street
- The Oystercatcher Public House and Restaurant.

Residents from the proposed development would have to cross the main traffic routes to reach any of these amenities or to use northern or westerly public transport. There are currently no controlled crossings although one is being proposed in this application. Tragedy beckons and this is a very serious problem which needs to be addressed.

Map 2 also shows the current accident blackspots on these trunk routes:

- Horsemere Green Lane (HGL) and Church Lane junction has poor visibility for those exiting Horsemere Green Lane. It has been the scene of many minor accidents and near misses.
- Ferry Road and the A259 junction combined with the access to Clymping Park forms an offset crossroads is a well-known difficult and hazardous junction.
- Church Lane/A259 Roundabout is the scene of many accidents
- Yapton Road double bends are a dangerous section of narrow road and the scene of major traffic accidents in the past. The most recent life changing incident was in December 2017. There is no suitable pedestrian pathway south from Horsemere Green Lane to the A259.
- The Oystercatcher junction of Yapton Road and A259 is poorly designed and a well-known accident black spot and the scene of recent fatalities.

Map 3 (sourced from West Sussex County Council) highlights these black spots.

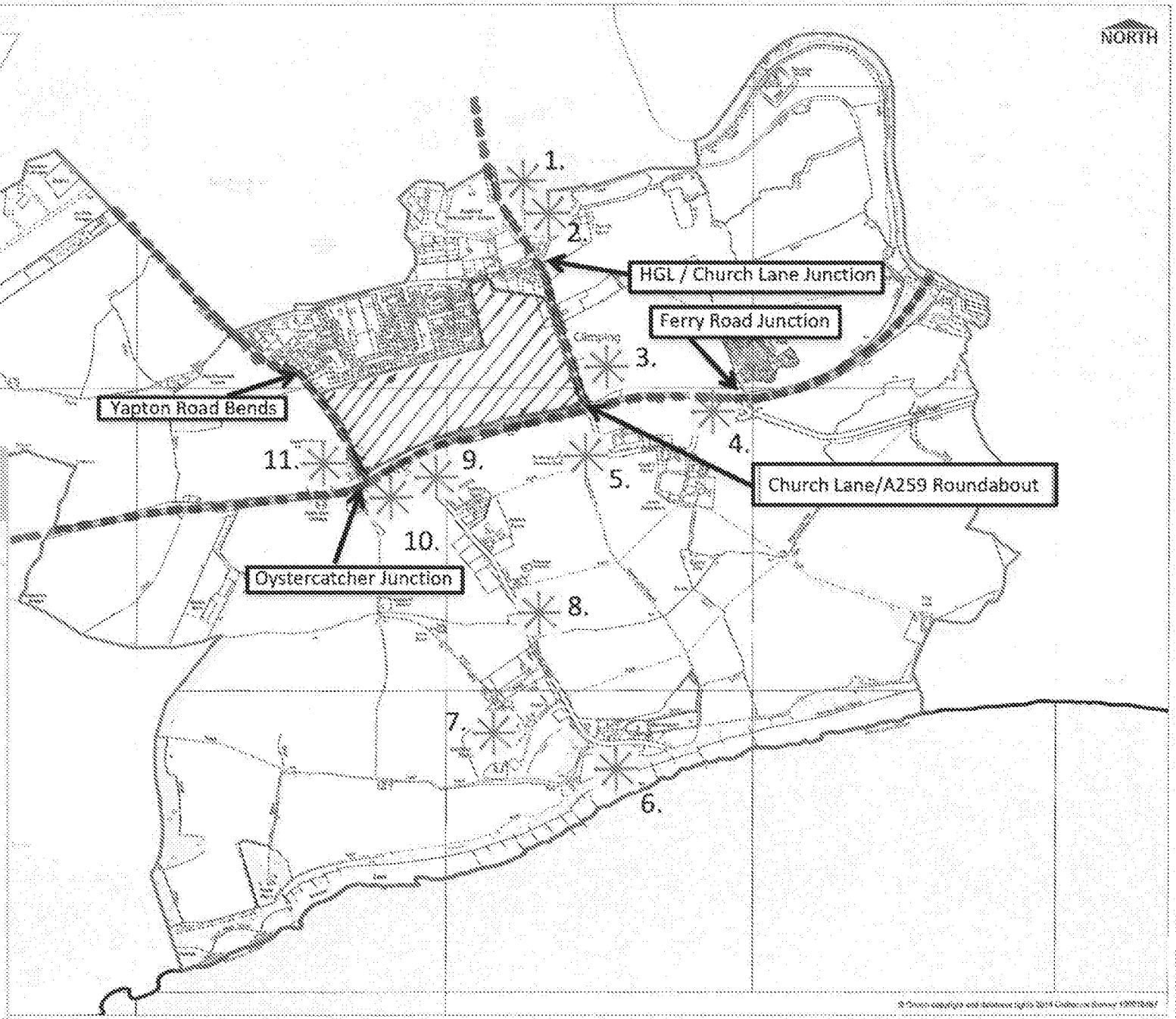
The application addresses none of these issues directly and the inevitable increase in local traffic will only exacerbate them.

The application provides for a change to the roundabout at the junction of the A259 and Church Lane, but the opinion of the Parish Council is that this will adversely impact on the already congested flow of traffic within the overall local network i.e. encompassing the A259, Horsemere Green Lane, Yapton Road and Church Lane, given that there is no net increase in road capacity. Exiting the new development into Church Lane will also prove problematic to the extent that the proposed new roundabout improves the flow of traffic north from the A259.

**Map 2 Clymping Parish -
Amenities and Trunk Routes**

Key

-  Proposed Development
-  Accident Blackspot
-  HGV Routes
-  1. Church Hall
-  2. Church
-  3. Village Hall & Recreation Ground
-  4. Westerly Bus Stop
-  5. Village School
-  6. Beach and Café
-  7. Bailiffscourt Spa
-  8. Black Horse Pub
-  9. Farm Shop
-  10. Westerly Bus Stop
-  11. Oystercatcher Pub



Map 3. Accident September 2012 to August 2017

(Extracted from West Sussex County Council Accidents Map)



● Minor ■ Serious ▲ Fatal

Drainage and Surface Water Flooding - additional comments

Arun District Planning applications CM/18/97, CM/10/98, CM/23/97, CM/20/99, CM/21/99, and CM 26/99 relate to previous developments along Horsemere Green Lane and highlight the historical concerns in the immediate vicinity of the application site over surface water flooding, surface water drainage, provision of adequate sewerage capacity and concerns for surface water infiltration of the sewerage system. These applications relate to the developments now known as May Close, Waterford Gardens and Cropthorne Drive that border the proposed development.

As an example, a letter from Southern Water to the Clerk of Clymping Parish Council (in relation to CM/18/97) dated 27 January 1997 Southern Water states that *"Horsemere Green Lane is a flat low-lying area which is subject to high groundwater levels in wet winters and which has suffered from flooding problems owing to the inadequacy of the local watercourses. In view of these factors, soak-aways may not be an adequate means of surface water disposal under all conditions. It is assumed that the proposed development might create a significant increase in impermeable area, if it were necessary to meet higher standards of parking and road layout"*.

Photographs 1 and 2 in the Clymping Character Assessment of the Neighbourhood Plan show extensive flooding of the site in the January 2014. Water runoff at that time was significant across Church Lane and the house "Field Place" (located at the lowest point) required temporary flood protection (sandbags etc.). Runoff from the housing developments along Horsemere Green Lane also overloaded the drainage system, flooded the lane and led to an Operation Watershed project to improve drainage to the eastern end of Horsemere Green Lane. The area adjacent to the application site is therefore well known to have surface water flooding issues contrary to the claims para 4.13 - 4.19 in the applicant's Flood Risk Assessment (Ambiental Report 2323).



Photo 1 Extensive flooding towards A259 viewed from Cropthorne Drive



Photo 2 Flooding adjacent to Cropthorne drive showing the poor winter soak away

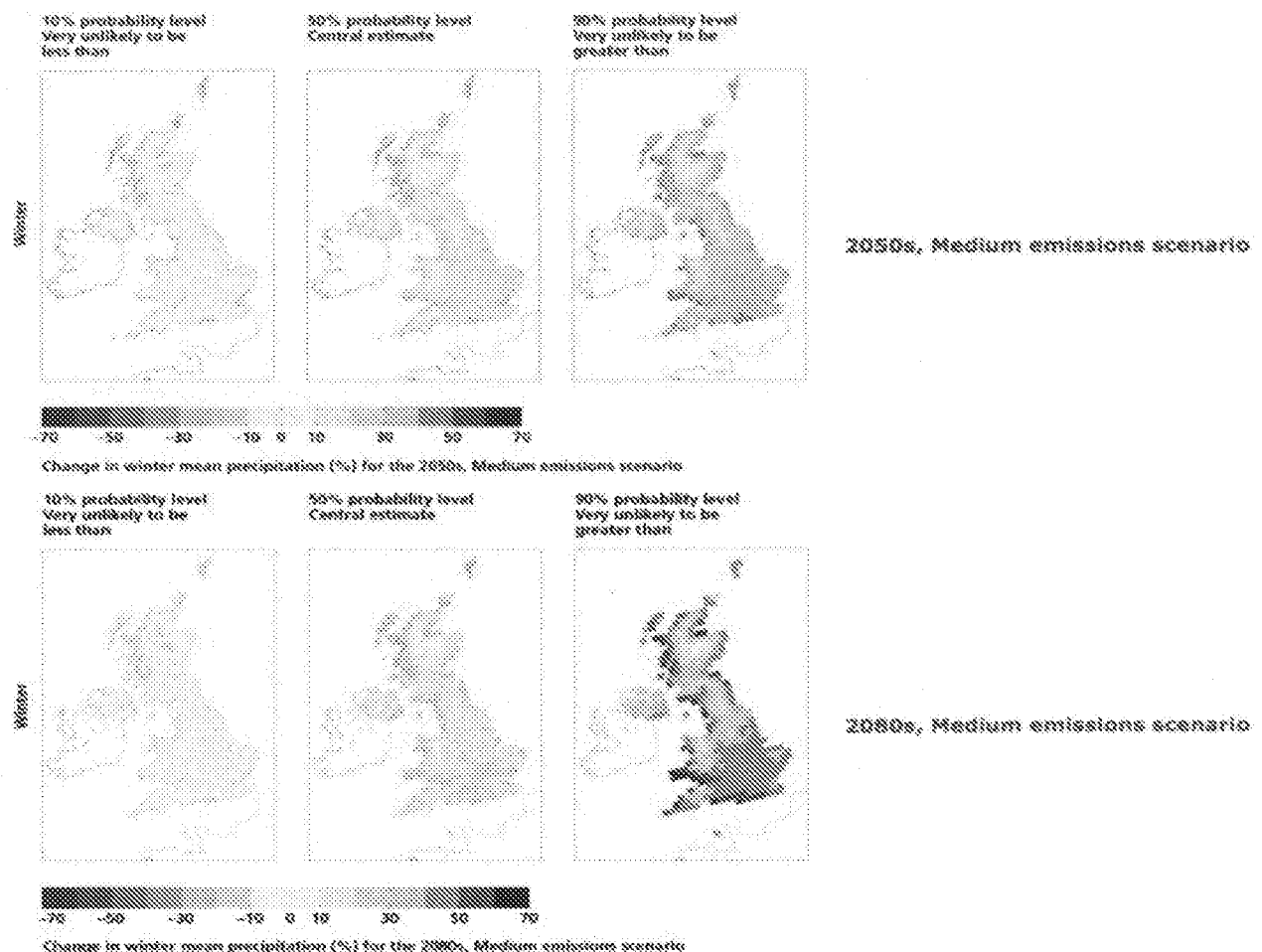
A further concern is that this historical perspective could underestimate future impacts due to climate change. The UK Climate Projection project is coordinated by the UK Meteorological Office on behalf of HM Government and provides a probabilistic review of climate futures based on the outputs of various climate models and assumptions. Last run in 2009, the outputs of UKCP09 have been revalidated with more recent work by the Intergovernmental Panel on Climate Change (IPCC). These show that the South Coast including West Sussex is likely to see some of the largest UK wide increases in winter rainfall over the period up to 2080's i.e. within the life of housing developments being proposed today. The data is all available at <http://ukclimateprojections.metoffice.gov.uk>.

The output for winter rainfall is attached. The data comes from a large number of climate model simulations explicitly designed to capture uncertainties and also to account for how well different models replicate some key aspects of recent and historical climate change. The display is a probability distribution.

At the 10% probability level only 10% of the climate model runs fall at or below this level and are considered unlikely. Similarly, at the 90% level only 10% fall above this and considered equally unlikely. The 10 – 90% range can then be used as a guide to possible futures. An increase in winter rainfall greater than 50% along the West Sussex coast is a credible outcome by 2080. Any developments should be required to demonstrate they are robust to these future possibilities before any approval. The applicant has so far failed to carry out even a percolation test to assess soak away and infiltration drainage at the site and has merely designed a SUDS system to cope with the impermeable areas post development (Ambiental Report 2322). This application should therefore be rejected on these grounds alone.

Change in Winter Mean Precipitation

UKCP09 <http://ukclimateprojections.metoffice.gov.uk>



The applicant's Foul Water Strategy (Ambiental Report 2495) states clearly that there is insufficient sewage capacity for the proposed development in para 2.5 and this was assessed against an original proposal for just 140 homes. The report is clear that the applicant has not assessed the viability of works to connect into the existing foul sewage system, direct connection to the Ford water treatment works or the viability of a private package treatment works.

There seem to be a complete lack of consistency between the detailed design presented of some highways proposals on the one hand and a lack of any credible plans related to the known issues of surface water flooding and foul sewer provision on the other.

CONCLUSIONS

The Application is significantly deficient in its approach to highway and pedestrian safety. It provides no credible plans for surface water drainage or foul sewage management.

Clymping Neighbourhood Plan - policy extracts:

Policy CPN 7 Protection of Open Views

All development will be considered with regard to the need to protect the open landscape character of the countryside and beach. The Clymping Character Assessment will be used as a reference to assess the impact of proposals.

Policy CPN 8 Protection of Trees and Hedgerows

Development requiring planning permission that damages or results in the loss of trees or hedgerows of arboricultural and amenity value will not be permitted unless the benefits of the proposed development outweigh the amenity value of the protected trees.

Development proposals must be designed to retain trees or hedgerows of good arboricultural and amenity value. Trees, woodlands and hedgerows which are important to the generally open rural environment of the Parish are identified in the Clymping Character Assessment.

Development proposals should be accompanied by a survey that establishes the health and longevity of any affected trees or hedgerows and a management plan to demonstrate how they will be so maintained.

Policy CPN 9 Protection of Natural Habitats

Development that results in harm to existing national and locally protected habitats will not normally be permitted. In some circumstances development proposals may be acceptable if accompanied by:

- An independent assessment of the overall net environmental impact, and
- Acceptable proposals to mitigate harm, or
- Acceptable proposals for the provision of equivalent alternative habitats

Policy CPN 10 Protection of high grade Agricultural Land

Development will not be permitted on the best and most versatile agricultural land, defined for the purposes of this policy as land graded 1, 2 or 3A in the national farmland grading scheme unless special circumstances can be demonstrated which may include

- there is an overriding need for the development in the proposed location and development on the site is demonstrated as the most sustainable option
- the development conforms to other statutory national and local planning policies

Policy CPN 11 Quality of Design

New development, including, rebuilding or alterations, must be of a high quality of design and protect and enhance local character as assessed by the Clymping Character Assessment.

Good design in Clymping means:

- a) responding to and integrating with the local built environment and landscape context as described in the Clymping Character Assessment; and

- b) respecting established building set back, using boundary treatments that reflect local context, and arrangements of front gardens, walls or trees and hedges; and
- c) using good quality materials that complement the existing palette of materials used within Clymping; and
- d) maintaining the visual importance and setting of landmark buildings as designated in the Clymping Character Assessment; and
- e) adopting the principles of sustainable urban drainage; and
- f) taking into account the requirements of 'Secure by Design' to minimise the likelihood and fear of crime; and
- g) using innovation to achieve low carbon sustainable design; and
- h) providing for:
 - sufficient external amenity space,
 - refuse and recycling storage
 - car and bicycle parking
 - child and disabled facilities where appropriate
 - the Integration of meter boxes, lighting, flues and ventilation ducts, gutters and pipes, satellite dishes, aerials and telephone lines

Development proposals of poor design that fail to take the opportunities available for improving local character and quality of an area and the way it functions will not be permitted.

Policy CPN 12 Reducing the risk of flooding

All developments in flood sensitive areas, including new green spaces, will be designed and constructed to reduce the level of flood risk.

Proposals for flood prevention works, including that for coast protection and sea flooding defence, will be supported provided that every attempt is made to reflect the visual character of the area, maintain the attractiveness and access to the beach.

Where there is potential for harm to existing coastal and inland habitats as part of any flood defence, an assessment of the environmental impact and proposed mitigation measures must be submitted and will be considered by taking into account the environmental benefits of the protection measures.

Policy CPN 13 Retain buildings or structures of character

As well as nationally listed buildings, locally listed buildings identified by Arun District Council and scheduled ancient monuments, other key buildings or structures which are of significant local architectural and historic interest and contribute to Clymping's distinctiveness are set out in the Clymping Character Assessment and listed in section 4.14 in this Plan.

Development proposals will be expected to retain and enhance the local distinctiveness of the identified buildings and structures and their setting.

Policy CPN 14 Traffic and the Environment

Development which will have a detrimental impact on highway safety and the living conditions of residents will be resisted. Consideration will be given towards securing planning obligations which meet the national policy guidance in NPPF paragraph 204, in relation to increasing highway

capacity, traffic management and traffic calming measures which will make the development acceptable.

Wherever possible, the mitigation measure should be put in place before the development itself is permitted to be used.

Priorities for Clymping are:

- Increasing and enhancing pedestrian and cycle networks
 - Safe crossing points for pedestrians, cyclists and equestrians to reduce the severance effect of the A259, traffic calming measures on local roads whilst retaining their essentially rural character
 - Measures that reduce the impact of heavy goods vehicles on local roads such as:
 - restrict commercial traffic to designated routes;
 - provide a signing strategy to ensure that only the most appropriate roads are used and unsuitable traffic is kept away from residential areas;
 - control traffic speeds to improve road safety and reduce environmental impact.
-