CLYMPING PARISH COUNCIL

Mrs V A Knight,
Clerk of the Council
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National Planning Casework Unit
5 St. Philips Place
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By email to:
[redacted]

10th May 2017

Dear Sir/Madam

Call-In Request re Planning Application CM/1/17/OUT submitted to Arun District Council

CM/1/17/OUT Land West of Church Lane & South of Horsemere Green Lane, Climping
Outline application for the erection of up to 300 dwellings & ancillary development comprising open space, a building within use class D1 (Non- Residential Institutions) of up to 875 square metres net, a building for A1 (Shops) use having a floor area of up to 530 sq. metres net, together with open space & ancillary works, including car parking & drainage arrangements, with appearance, landscaping, layout & scale wholly reserved for subsequent approval.

Clymping Parish Council would like to request that this planning application is called in for determination by the Secretary of State.

The application is to build 300 new homes on Grades1and 2 agricultural land and it is currently under consideration by Arun District Council. Our reasons for requesting the call-in are:

1. **Contrary to the National Planning Policy Framework** - Council considers the application is contrary to the National Planning Policy Framework, in particular Paras 35, 58, 60, 99, 112 and 118.

2. **Contrary to the Local Development Plan** - The application is a Departure from the Arun Local Development Plan and is contrary to the saved Policies of the Arun Local Plan 2003 - Policies GEN3, GEN 7, GEN 22 and Gen 29.

3. **Contrary to the made Clymping Neighbourhood Plan** – If permitted the application for 300 homes (nearly double the existing residential properties in the parish) would have a significant adverse impact on the character of our parish. It contravenes a numbers of specific policies in our Neighbourhood Plan. Key matters of concern are:

   a) **Loss of Local Identity and Sense of Place for our Community** - The proposed site is an important part of the rural character of Clymping.

   b) **Loss of Countryside and Grades 1 & 2 Agricultural Land** - Protection of agricultural land is important to the sustainability of the area and to the country.

   c) **Loss of trees and hedgerows and Natural Habitat for Wildlife** – Loss of the agricultural land and trees and hedgerows which are an important feature in the generally open rural environment of the Parish will severely impact on the natural habitats for wildlife.

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d) **Design and adverse impact on the neighbourhood** – Although this is an outline application, the layout as shown will be visually intrusive and impact on the privacy of neighbours.

e) **Detrimental to a listed Building –** The proposal affects the setting of a Listed Building.

f) **Risk of flooding** – The site is prone to surface water flooding and Council is also concerned that the existing sewage systems and treatment sites will not cope with additional housing.

g) **Sustainability and Lack of Services/Infrastructure –** The application is of questionable sustainability as it is on a site some distance from the main amenities and centres of employment in the District, making car use essential *(note: there is a small primary school in Clymping but there are no medical facilities).*

h) **Detrimental impact on Road Network:** The proposal will directly add to congestion and associated road safety issues on our local roads and to major routes such as the A259.

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. Please see the Appendix to this letter which sets out our objection as submitted to Arun District Council, relevant extracts from our Neighbourhood Plan, and a web link to view the complete Clymping Neighbourhood Plan.

To reiterate, Clymping Parish Council would like to request a call-in for this planning application.

Yours sincerely

[redacted]

Val Knight
Clerk to Clymping Parish Council

ARUN DISTRICT COUNCIL CM/1/17/OUT

APPENDIX

CLYMPING PARISH COUNCIL - OBJECTION TO PLANNING APPLICATION CM/1/17/OUT submitted to Arun District Council on 16th February 2017

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 and significant 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:

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 of 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.

8. **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 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 not help with the flow of traffic within the overall local network i.e. encompassing the A259, 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.

   There is also no provision for controlled pedestrian crossings of either the local roads or of the A259 so that facilities to the south of the A259 – including the village school, the beach and bus stops - can be safely reached by pedestrians and cyclists as appropriate. If the proposed new roundabout improves flow along the A259, the crossing will simply become more difficult and the A259 severance increased.

   CNP policy 14 Traffic and the environment, sets out these concerns and incudes a priority for Safe crossing points for pedestrians, cyclists and equestrians to reduce the severance effect of the A259.

NOTES TO THE ABOVE: 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.

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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.

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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

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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

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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.

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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.

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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.

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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 traffics speeds to improve road safety and reduce environmental impact.

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