

CLYMPING PARISH COUNCIL

OBJECTION TO PLANNING APPLICATION CM/6/18/PL - Land at Northwood Farm Yapton Road: Change of use to develop a concrete batching plant, with associated infrastructure, site offices & parking

Clymping Parish Council **strongly objects** to this application for the following reasons:

1. **The application is in contravention of the Clymping Neighbourhood Plan** which was framed in the context of the emerging Arun Local Plan (Published Version October 2014) which includes **Policy C SP1 Countryside** that reads:

“Outside the defined Built-Up Area Boundary (as identified on the Policies Maps) as well as outside both the strategic, site specific and broad allocations, the countryside will be safeguarded for its own sake. Development will not be permitted there unless it is:

- a. for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan; or*
- b. for quiet, informal recreation; or*
- c. for green infrastructure; or*
- d. for the diversification of the rural economy; or*
- e. for road and/or cycle schemes; or*
- f. in accordance with other policies in the Plan which refer to a specific use or type of development.*

Permission will not be given for the extension of isolated groups of buildings or the consolidation of linear or sporadic development unless the proposal accords with criteria (a) to (c) or (f). The Council will take into account cumulative impact of development in the consideration of planning applications. To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.”

2. **The application does not mention the Clymping Neighbourhood Plan** at all. Policy CPN 4 is applicable as the location is claimed to be in commercial use. **Policy CPN 4 Protection of existing commercial premises or land**, reads:

“Proposals to upgrade or extend existing employment sites will be supported provided that:

- the impact on the amenities enjoyed by occupants of surrounding properties is acceptable; and*
- they do not compromise the character of the area or openness of the countryside or beach; and*
- traffic impact is acceptable in terms of highway safety and living conditions of residents.*

Proposals should include a traffic impact analysis or transport assessment which is proportionate to the development and demonstrates traffic impact and measures which may be taken to mitigate impacts.

- they comply with other policies in this Neighbourhood Plan.*

There will be a strong presumption against the loss of commercial premises or land which provide employment and are of demonstrable benefit to the local community. Applications for a change of use to an activity that does not provide employment opportunities will only be permitted if it can be demonstrated that:

- the commercial premises or land in question have not been in active use for at least 12 months; and there is little or no prospect of the premises or land being reoccupied by an employment generating user. This must be proven through an independent sustained marketing campaign lasting for a continuous period of at least six months; and*
- the new use will not be hazardous to road safety or the living conditions of residents and the scope for mitigation of any impacts is identified and implemented;*
- the application complies with other policies in this Neighbourhood Plan.”*

3. These points are developed below:

- a. **Detrimental to the amenity of residents** – It will adversely affect the amenity of nearby residents who will be affected by noise and dust emissions. It will also impact on all residents due to the number and size of additional HGVs using local roads (including Yapton Road)
- b. **Noise** – Council has serious concerns about noise from the site. The analysis confirms the very high level of noise generation at the site (> 100dB – ear defenders will definitely be required) but then suggests that it will be a million times lower at the nearest properties (dropping from >100dB to just 40dB). Council considers the assumptions laying behind this degree of sound attenuation are highly questionable and should be verified independently based on a detailed understanding of the relationships between the proposed development and neighbouring properties. The data appears to be for noise levels averaged over an hour. Residents will be more concerned about peak levels of noise. As well as their speed a major issue with HGVs is the sound of their air brakes being applied. Residents would be exposed to all this from 7.00am every working day
- c. **Emissions** – Council has serious concerns about emissions from the site. No mention is made in the application of steps to control the inevitable dust arising from the blending of sand, aggregate and cement powder. There is no assessment of how much dust will be created, and how far it will travel. The application does not take into account the impact on the closest houses or on wildlife and plants.
- d. **Traffic Hazard** – Council believes the transport assessment fails to fully consider the impact of the application on our local roads. It even makes the conclusion that HGV traffic will actually be reduced based on a single assessment of peak times, on just one day, at the immediate exit from the site onto Yapton Road opposite the Rollaston Park turning. It fails to consider the impact of the 76 additional HGV movements a day on the Yapton Road between the site, via the dangerous double bends, to and from the notorious Oystercatcher Junction with the A259. It does not take account the recent spate of accidents on this stretch of road and also fails to consider the implications of the approved planning application for the Grundon Waste Plant at Ford (WSCC/096/13/F). The current Grundon approval allows for 60 HGV movements on the Yapton Road also turning at the Rollaston Park junction. **The Transport Assessment is therefore completely inadequate.**

The proposal is clearly detrimental to road safety and no mitigation proposals are proposed. The application is therefore in contravention of Clymping Neighbourhood Plan Policy CPN 14 Traffic and the Environment which states:

“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:

- a. *Increasing and enhancing pedestrian and cycle networks*
- b. *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*
- c. *Measures that reduce the impact of heavy goods vehicles on local roads such as:*
 - i. *restrict commercial traffic to designated routes;*
 - ii. *provide a signing strategy to ensure that only the most appropriate roads are used and unsuitable traffic is kept away from residential areas;*
 - iii. *control traffic speeds to improve road safety and reduce environmental impact.”*
- e. **Alternative Locations Nearby** - The countryside policies (Policy Gen 3, 2003 Local Plan or in the emerging Local Plan C SP1) limit development but do allow for diversification

of the rural economy subject to restrictions. The restriction for approvals (Policy Dev 8, 2003 Local Plan and in the emerging Local Plan SD SP3) then apply and these allow for approval only if the proposal cannot be located elsewhere. There are several Industrial Estates nearby. For instance, Concrete Mouldings is already operating on the Rudford Estate. Has it been adequately demonstrated that there are no suitable alternative sites in the area? The chosen site in this application is clearly not suitable.

Val Knight
Clerk of Clymping Parish Council

18 April 2018