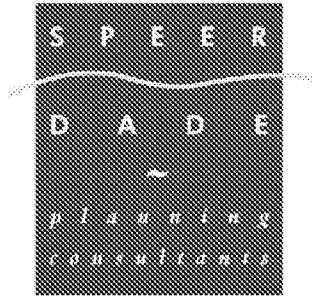


11 March 2020



Group Head of Planning
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

Dear Sir

**FG/6/20/PL - DEVELOPMENT OF ANIMAL RESCUE CENTRE
HANGLETON FARM LIVERY STABLES, WADARS ANIMAL RESCUE
CENTRE, HANGLETON LANE, FERRING BN12 6PP**

On behalf of our client, Mr Geoffrey Fox of Reynard's Nursery, Hangleton Lane, Ferring BN12 6PP, we make the following objections in respect of this planning application.

Noise

The proposal includes kennels with dogs being kept in three buildings and in outside runs. The floor plan shows 23 numbered kennels, although the application does not appear to state the maximum number of dogs which could be accommodated.

In respect of planning permission FG/128/13 on the site, the environmental health officer's comments included:

Detailed design and layout of kennel blocks and runs are not provided, and no measures are identified to mitigate noise from external runs. Concerns that long periods dogs barking (particularly in outside runs) may cause annoyance to residents.

The environmental health officer recommended conditions on noise be attached, if the planning officers were to approve that development.

According to an article titled *The assessment of dog barking noise from boarding kennels* in the Institute of Acoustics publication, Acoustics Bulletin May/June 2016:

One of the key issues affecting such establishments is dog vocalisations, chiefly barking, but which may also include whining, howling and yelping (DEFRA, 2005). Barking may be audible over extended distances, giving rise to nuisance at up to 500 m (EPA Victoria, 2008). On occasions, a number of dogs may contribute to an

extended barking frenzy, giving rise to potentially severe noise nuisance at neighbouring dwellings (An Bord Pleanála, 2001; Manley v New Forest DC, 2007).

The article mentions the approaches adopted by different local planning authorities which included a minimum separation distance equal to 10 times the number of dogs proposed (Boston Borough Council) and a 400 m separation distance, adopted from the authority's guidance on intensive animal units (Hertfordshire County Council).

Dogs can bark and make other noise at any time of day and night which can be set off by people or other dogs. It is likely that rescue dogs would require more medical attention during the night than other dogs and would, potentially, be more prone to making noise owing to the unfortunate backgrounds from which they would be likely to come.

Dog vocalisation is more intrusive than other forms of noise nuisance because it can be intermittent and is typically a sharp explosive sound, rather than being at a constant level. It can occur during the night when background noise levels are much lower.

Despite there being a number of businesses operating in vicinity, Hangleton Lane is, nevertheless, a quiet area. The sounds of dogs barking would be intrusive in this environment.

Our client's house is located about 134m from the proposed kennels and outside runs. Three horses graze in our client's paddock immediately adjoining to the south of the proposed site of the kennels. Our client believes his horses will be frightened and/or disturbed by the sound of dogs barking in such close proximity, adversely affecting their welfare.

We understand that there are about 13 residential properties within 260 metres of the proposed kennels, the closest of those being about 75 metres away. There is a large area of housing, south of Littlehampton Road, about 280 metres from the proposed kennels. An aerial photo of the area and schedule of approximate distances between those properties and the site of the proposed kennels is attached.

A number of letters in support of the proposal have been submitted. These appear to be from people who do not live within sound of the proposed development.

Local plan policy QE SP1 (Quality of the environment) requires all development to contribute positively to the quality of the environment and not to have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the district.

Local plan policy EMP DM1 (Economic growth outside the Built-up Area Boundary), 6 (g) requires proposals to demonstrate a satisfactory relationship

with neighbouring uses in order that the amenities of nearby residents, in particular, are protected.

Local plan policy D DM1 (Aspects of form and design quality), 3 says that development must have minimal impact to users and occupiers of nearby property and land. For example, by avoiding ... unacceptable noise and disturbance.

Local plan policy QE DM1 requires developers proposing new noise generating development proposals to support applications with b) a noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment and c) evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements.

These requirements do not appear to have been met. Further information about noise impact and any mitigation possible should be submitted, in accordance with local plan policies QE DM1 and EMP DM1, before a decision is made so that these matters can be considered fully and properly.

Planning conditions could not mitigate noise nuisance adequately but, if the council were to consider granting planning permission, conditions should be attached, including:

- control over the maximum number of dogs
- noise level limits
- management and control measures
- measures to reduce noise emanating inside and outside the building

Traffic

Our client is concerned about the increase in traffic using Hangleton Lane and its junction with Littlehampton Road which would occur under these proposals.

The lane is narrow and vehicles are unable to pass each other along much its length.

Car transporters stop regularly on Littlehampton Road dual carriageway, either side of the junction, to deliver vehicles to the car dealerships (see attached photos). Our client advises that there are two or three deliveries a day. This makes it dangerous, in particular, to exit Hangleton Lane onto Littlehampton Road.

Several accesses emerge onto Hangleton Lane and Littlehampton Road in the vicinity of the junction, adding to highway dangers.

Our client reports that the applicant holds sales of chickens from time to time. When these events take place, a large number of vehicles use the lane and there is a constant stream of traffic for a few hours.

Our client believes the level of vehicle movements suggested in the application is about the current level and the proposed development will add a greater number of movements. Our client advises that the animals are cared for by large numbers of volunteers and a number of people keep horses at the application property, which add to the numbers.

The likely increase in traffic would have environmental consequences for residents who live in the lane and highway safety implications.

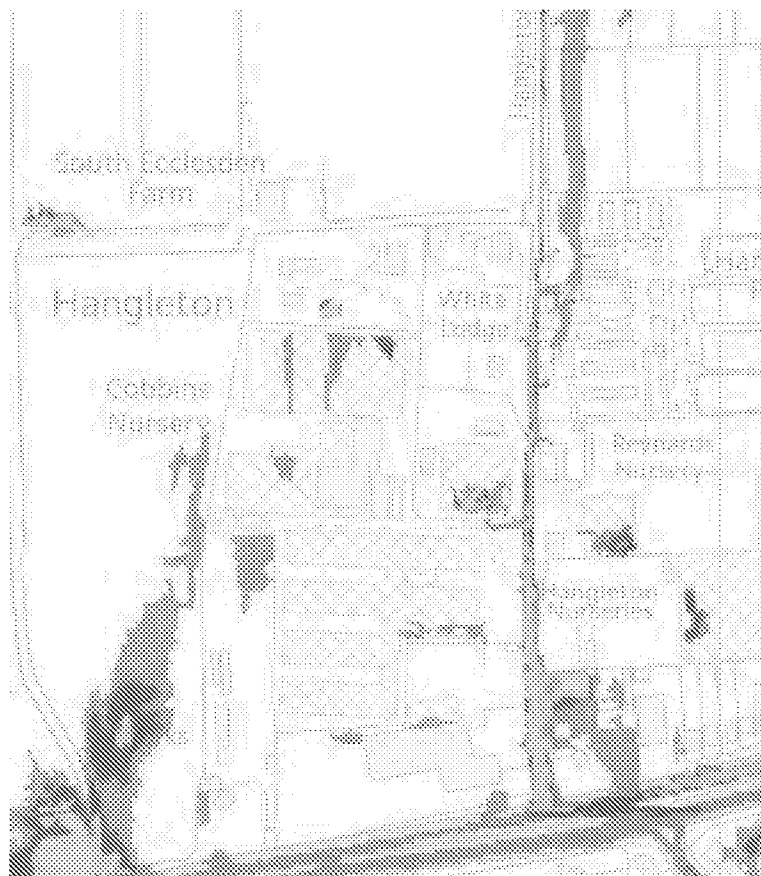
Local plan policy EMP DM1 (Employment Land: Development Management) 6 (b) requires proposals to demonstrate that they would not intensify uses at the site to the detriment of existing public access routes and highways. Local plan policy T SP1 (Transport and Development) says that the council will ensure development provides safe access on to the highway network.

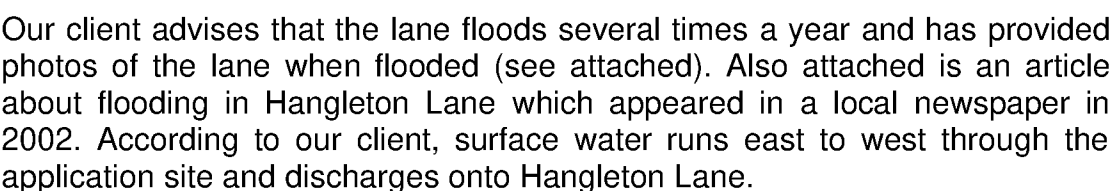
The proposals would not comply with these policies or with local plan policy QE SP1.

Flooding

The council's strategic flood risk assessment maps show part of the application site and Hangleton Lane to be subject to updated Flood Map for Surface Water 30-year extent and 1,000-year extent. The Gov.UK flood risk map for England shows part of the application site and Hangleton Lane to be at high and medium risk from surface water flooding.

Level 1 SFRA: Appendix E Surface Water Flood Risk (extract)





from flooding, identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment (SFRA) will only be permitted where a flood risk assessment has been carried out. It does not appear from the council's website that a flood risk assessment has been submitted in connection with this application.

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Conclusion

The adoption of the 2018 local plan represents a material change in circumstances since planning permission FG/128/13 was granted. The current proposals should be assessed by reference to the current policies.

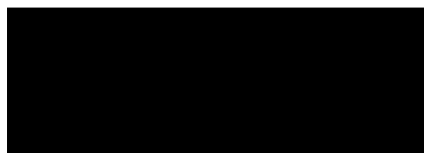
The current proposals should not be approved.

Yours faithfully



Speer Dade

SPEER DADE Planning Consultants
Chartered Planning & Development Surveyors
29 Kings Drive Hassocks BN6 8DX



Schedule of approximate distances of dwellings to proposed kennels

(Dwellings identified on separate aerial image)

Measurements in metres

A	206
B	212
C	174
D	134
E	106
F	141
G	137
H	98
I	75
J	129
K	197
L	255
M	177
N	280

Photographs of car transporters parked on Littlehampton Road either side of the Hangleton Lane junction (27/02/20)



Photograph of three car transporters parked on Littlehampton Road near the
Hangleton Lane junction provided by our client



Photographs of flooding in Hangleton Lane provided by our client





Hangleton Lane dwellings



VILLAGE FLOODSLittlehampton On-Line - www.littlehamptontoday.co.uk

Road is blocked and water seeps into home



■ **UNDER WATER:** Left, at the front left-hand side of the picture is a car that was rescued from Hangleton Lane, Ferring, having been ruined by water rising to 3ft deep. **12225**

Below, the full horror of the rapid onslaught is witnessed as Hangleton Lane is submerged under feet of water. **12224**

Ferring feels the force of flash flooding

TORRENTIAL rain left north Ferring residents with a 150-metre-long puddle outside their homes, in Hangleton Lane.

The murky pool, leading up from the A259 junction, was more than 2ft deep

on Monday. It blocked the road and forced a 92-year-old villager out of his home, after water seeped into his property.

While motorists edged across the puddle, which had covered both

Worthing-bound lanes of the A259, Hangleton Lane residents tried to unblock a drain with a wooden pole.

Leslie Pearson, 84, of Hangleton Lane, complained that the road always flooded when it rained.

He said drains on the A259 were built "too high" and nearby properties suffered as a result.

"It's not good enough," said Mr Pearson. "We've been on to the council, got out the Highways Agency — they

have done nothing." A West Sussex County Council spokeswoman said: "We believe part of the drainage system is private. "We are aware of the situation and it is being looked into."

PHOTOGRAPHS — MICK CANNING

