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Sent: 17 August 2021 17:15
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: OBJECTION - M/99/21/PL

Please treat as a rep

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Sent: 17 August 2021 16:47
To: Anita Gardner <Anita.Gardner@arun.gov.uk>
Subject: OBJECTION - M/99/21/PL

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My objection is shown below and should be linked to objection reference OWPC39658

Regards

M/99/21 – Guernsey Farm

I OBJECT to this application by West Sussex County Council for the following reasons.

Planning classifications and limitations

The application seeks blanket approval for very broad planning classifications i.e., B8 (Storage & Distribution including outside storage) and E9(g) which was formerly known as 'Light Industrial B1(c)'. Without limitations to the applications there could be a situation of multiple lorry movements every hour, 24 hours per day, and industrial processes which are unneighbourly and completely inconsistent with the location by reason of noise, light, and traffic movements. There are further concerns that the western side of the site, adjacent to Yapton Road, could be used for large scale open storage.

Gaps between Settlements – Policy SD SP3

The site is within the boundary of Policy SD SP3. It is absolutely essential that the gaps between the settlements of Littlehampton and Middleton-on-Sea are maintained. This is particularly important at this location which is at the western boundary of the agricultural land and this should remain linked to farming/agriculture to ensure no planning creep now, or in the future.

It is also very important that the words of Mark Dakeyne (Arun Local Plan Inspector) are given full weight. In his Final Report on the Examination of the Arun Local Plan (File Ref: PINS/C3810/429/1) he stated in paragraph 41 “Although much of the coastal plain around Bognor Regis and Littlehampton is built-up **there is a need to maintain the character of the remaining undeveloped coast, for example between Littlehampton and Middleton**”.

Countryside Policy C SP1

The site is outside the Built-up Area Boundary (Local Plan SD SP) and is therefore defined as Countryside where this policy is applicable. This allows for:

- Operational needs of agriculture, horticulture, forestry.
- Management of waste.
- Green infrastructure
- Diversification of the rural economy, roads or cycle schemes

This effectively precludes B8 and E9(g) approvals.

Quality of the Environment 21

Being a rural area, Noise pollution must be taken into account – 21.2 - to ensure the application does not impact on the privacy, amenities or life style of nearby residents.

Light Pollution 21.3. This is important as this is a rural area where a decision has been taken not to have street lighting.

21.3.1. Is particularly relevant as light pollution can cause sleep disturbance, annoyance and can brighten the night sky. Dark skies are important for health and wellbeing, the conservation of natural habitats, for cultural heritage and to observe the stars at night. Restrictions must ensure Dark Skies are maintained.

Transport Statement

The report recognises that Yapton Road is a semi-rural road and measures the width close to Guernsey Farm but is duplicitous at 2.5.3 when it states that there are footways on both sides of the carriage way. Whilst there is a footpath from just north of Guernsey Farm south to Silver Birch Drive it is only on one side of the road. Further, there is no footpath from Comet Cottage to Comet Corner. The report also fails to mention that the road narrows to the south and that on the western side of Yapton Road a tall hedgerow forces van and lorries towards the middle of the road, principally on the bends. It is particularly dangerous for oncoming

traffic and for cyclists travelling along the road. Indeed, most cyclists resort to riding on the footpath for safety although this is not permitted (Highways Code rule 64).

The Accident Review (2.4) highlights the plethora of accidents but puts them down to driver error rather than highway issues. That is irrelevant. Accidents occur mostly due to peer pressure because of extended queues around Comet Corner and further vehicles will only increase the accident rate. (Their figures do not, of course, include the impact of recent planning approvals including the new nursing home and its associated traffic flows – M/68/20/PL).

Speed Survey & visibility (3.3) – It is concerning that on a 30 mph road, vehicles were travelling at an average speed of 35.8 mph. That must make turning into and out of Guernsey Farm even more hazardous.

Traffic projections – an increase of 300% from 22 per day (4.2.3) to 69 per day (4.3.3) is dismissed in (4.4.1) despite the 47 additional movement increase. That gives yet more potential for accidents.

Site Access 3.2. In (3.2.1) it states that there will be no articulated lorry access but that 7.5t panel vans and refuse trucks could enter the site. There must be restrictions on the types of vehicles which can enter the site.

Summary

Please REFUSE this application. The site is unsuitable for B8 or E9(g) use and should remain as agricultural/farming because this is a rural area. Any change will impact on local residents and cause increased noise and light pollution together with increased traffic along a rural road and further exacerbate traffic problems at the accident prone Comet Corner junction.

If in the unlikely event that the Development Control Committee are minded to approve this application, then strict and enforceable conditions must be imposed including:

- Hours of working limited to: 8 a.m. – 6 p.m. Monday – Friday.
- Vehicle access – No articulated lorries and maximum 7.5t panel vans.
- Limit number of daily traffic movements to cumulative total of 50 in/out.
- All commercial vehicles must enter and leave site from the north (A259)
- Noise levels must not exceed 65Db during the day (8 a.m – 6 p.m.) and 55Db for the remainder of the time.
- No site lighting permitted after 10 p.m. Light levels must be kept to a minimum and be designed to prevent light spillage and glare.