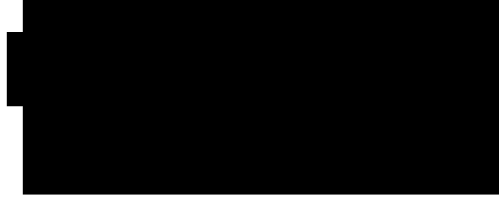




**WALBERTON PARISH COUNCIL
INCLUDING FONTWELL AND BINSTED**

Parish Council Office, The Pavilion, The Street,
Walberton, Arundel, West Sussex, BN18 0PJ.



10 May 2021

Dear Sirs,

Walberton Parish Council wishes to register an Objection to the application WA/32/21/PL Land West of West Walberton Lane. Our reasons for objection are as follows.

Site location

- ◆ The site is not part of the 2020 Walberton Neighbourhood Development Plan which passed referendum on 6th May 2021.
 - The site was submitted for the Plan when a call for sites was made. It was rejected by residents in 2016. Independent assessment by AECOM as part of the Plan review process also rejected the site (Neighbourhood Plan Evidence Base, <https://www.walberton-pc.gov.uk/Document/Default.aspx?DocumentUid=7CB9A4D0-8D8D-4DF8-BF4B-27C63AE60E83>).
 - The Parish has exceeded its required allocation of 60 dwellings in its Plan; with a proven track record of fulfilling its quota no extra development can be justified.
 - During the Plan consultation, 97.2% of residents considered that preserving the setting of the villages within open countryside was an important consideration.
 - No response or challenge was made by the developer to the consultation stages of the Plan.
- ◆ The site affects the setting of the conservation area.
 - Walberton Policy VE4 Conservation Areas and Areas of Special Character: “Proposals that adversely affect the setting of the two Conservation Areas will not be supported. New development must protect the open/rural character of the Conservation Area’s setting and sustain or enhance the visual connections between the village’s core and its rural hinterland, including longer views to the South Downs, which contribute to the character of the Conservation Area.”
 - The site interferes with the views across Walberton Green from the Conservation Area in conflict with Walberton Policy VE13: Views and Vistas. This view is number 1 in the Plan’s supporting evidence document at <https://walbertonpc.sharepoint.com/:b:/g/EZP8h3BcB81MutcPIICLg08DYDLKIDwrAI7608iqzyeew> .

- ◆ The site is listed in HELAA as Not Developable
 - HELAA lists constraints as “Flood Zone Fluvial 2 & 3a, groundwater flood risk, conservation area and TPO. Designated as existing open space in the Local Plan.”
 - The HELAA summary is that, “The site lies adjacent to the Walberton Conservation area. Potential access would be from Eastergate Lane. Due to constraints related to the site access and potential impacts upon the conservation area, the site will be added to the HELAA as "rejected" at this time.”
- ◆ This development is on a green field site outside the Walberton built-up area boundary.
 - ADC Policy C SP1 “Countryside” states that residential development in the countryside outside the BUAB will not be permitted unless in accordance with policies in the Plan which refer to a specific use or type of development. It is noted that none of these relate to the proposed development at the application site. As this site lies outside the nearest BUAB, it is categorised as being within the countryside and the scheme would therefore conflict with Local Plan Policies SD SP2 and C SP1.
 - The site does not fulfil the criteria for Walberton Policy HP1 2020 as it is outside the built-up area boundary and is not in accord with countryside policies in the Arun Local Plan and South Downs Local Plan.
- ◆ ADC Policy SO DM1: Soils states that agricultural land should be protected.
- ◆ Development at this location does not fulfil the criteria laid down by ADC Policy H SP3 – Rural housing and exception sites.

Environment

- ◆ At the pre-application stage in discussion with ADC, the development failed to demonstrate its environmental suitability.
 - At the first pre-application stage, the proposal was found to be in conflict with ADC Policy ENV DM5. The developer acknowledges that no environmental gains would result.
 - ADC stated that, “the impact on environmental sustainability would be unacceptable with (no) reasonable mitigation to offset the harm being possible for the loss of open countryside... and it is considered, on balance, that the proposal would be environmentally unsustainable and would therefore fail to benefit from the NPPF presumption in favour of sustainable development,” and also that, “the principle of development on this site is clearly contrary to the policies within the development plan”
 - At the second revision pre-application discussion, ADC continued to assert that the “redesign fails to meet the environmental objective and so NPPF presumptive development not engaged”.
 - Although the third revision showed some improvement, ADC remained on the record as not supportive.
- ◆ This site impacts a key Biodiversity Corridor. This is designated a Green Infrastructure Corridor by ADC. It is listed in the Walberton Neighbourhood Plan as Biodiversity Corridor 3 – Copse Lane chalk streams (document <https://www.walberton-pc.gov.uk/Document/Default.aspx?DocumentUid=E2691600-262F-415B-9D70-59D3BF874C5D> in the Plan evidence base). This puts the proposal in conflict with Walberton Policy VE10 2020 – Biodiversity Corridors.
- ◆ The north western part of the site is within the SDNPA HRA buffer.

Flooding and watercourses

- ◆ Some parts of the site are in flooding zones 2 and 3a. These zones extend up to the proposed housing plots.
- ◆ The ADC SFRA map shows medium risk of groundwater flooding.
- ◆ The scheme does not aim to reduce the overall level of flood risk in breach of Walberton Neighbourhood Plan Policy VE7 – Surface Water Management.
- ◆ The drainage engineer was informed that the development comprised 21 houses when in fact the application is for 30. The extra ground cover will adversely impact their assessment.
- ◆ Groundwater levels have been monitored for an inadequate amount of time – 103 days rather than 183 days. The planning submission supporting documentation includes a statement from Forge Environmental that, the developers “did not realise it would be necessary to undertake groundwater level monitoring between October and March.”
 - This suggests a fundamental lack of understanding of the nature of the site by the developers.
- ◆ The reduced soakaway capacity will have an adverse impact on the properties in Barnham Lane by increasing their flood risk from runoff water.
- ◆ The development has watercourses passing through it. It is in close proximity to Walberton Pond which has already recently been adversely affected by runoff into the chalk streams from development at Sunny Corner (WA/75/17/PL). This proposal conflicts with CE6: Protection of Watercourses.

Traffic

- ◆ The developer’s transport assessment states that no incidents are recorded on Eastergate Lane. This is factually incorrect as West Sussex Safer Roads Partnership reports an incident in 2020
- ◆ Traffic counts made in September 2020 will be lower than normally experienced due to the general reduction of traffic during the Covid-19 pandemic.
- ◆ The trip generation calculation for 30 dwellings gives only 12 morning peak period departures and 11 afternoon peak period arrivals. This seems a little low – the 2011 Census shows that Walberton Parish has almost double the West Sussex average 3 and 4 car ownership per household. Assuming an average of 2 cars per household gives 60 cars on the estate; car travel is generally necessary in the Parish for work purposes.
 - This is a significant number of vehicles to add to the village. Walberton Neighbourhood Plan Policy GA5 Traffic Management states that proposals that significantly increase the level of traffic within the villages will be resisted.
- ◆ This development increases the amount of traffic that will use the Fontwell roundabouts. There is no demonstration of nil impact on them in the assessments. These are already well documented to be over capacity; Highways England has objected to other local developments (eg WA/68/20/OUT Land West of Tye Lane) because of this issue.
- ◆ There is minimal public transport in the immediate locality – buses are infrequent.
- ◆ There is no pedestrian footpath along Eastergate Lane. The site plan suggests a connection directly east to Walberton Green; this requires the consent of the Parish Council which is not a given.

- ◆ Eastergate Lane has a 40 mph speed limit at the proposed access point with limited visibility both west and east. The Transport Assessment acknowledges that there is a risk of accidents at the access point because of this.

Yours sincerely,

(sent unsigned by email)

Andy Peppler.

Clerk to Walberton Parish Council on behalf of the Planning Committee.