

Woodlands
Cope Lane
Walberton
Arundel
West Sussex BN18 OQH



4th August 2021

Arun District Council,

Dear Sirs,

Re: Planning application WA/63/21/PL: Land East of Tye Lane, Walberton.

We wish to register an objection to this application on the following grounds.

1. This application is wholly premature and based on the assumption that the proposed A27 route will block the existing access which may not ever happen. There is no impediment to site access through the permitted route via Yapton Lane and this potential risk was actually known when the original planning application was made so the above application should therefore be refused outright at this stage. In addition there is no planning application regarding the A27 route or even a firm design specification at the time of writing. This is the second time the developer has tried to gain access from Tye Lane, the first application was to better facilitate traffic heading north so it was always the intention to try and gain access onto Tye Lane. The logic of the argument is fundamentally flawed as if the (currently non-existent) A27 route as currently proposed by Highways England (HE) blocks the Yapton Lane access then it will also sever the Tye Lane access. Traffic will then be forced to head south into the village. • As such, there is no justification for an alternative access via a route already deemed inappropriate for other sites (eg Land West of Tye Lane, WA/68/20/OUT). • Non-disclosure agreements are in place between HE and the developer so there is currently lack of full disclosure of information.
2. The developer states that they have undertaken community engagement but this only amounts to a flier sent to a few properties, we live in Walberton, quite close to the proposed access and have had no consultation!
3. HE is currently consulting on mitigation measures with a revised detailed design due for the A27 Grey route (Grey). Walberton Parish Council understands that HE are purchasing properties on Yapton Lane that are blighted by the proposed route; therefore should the next A27 bypass design still affect access to AG then HE would be able to provide access onto Yapton Lane via their newly purchased land. Such access would be eminently more suitable for both the safety and amenity of access and we understand that Peter Mumford of HE wrote to ADC on 3 December 2020 saying he recognised "the need for Highways England to ensure that we're able to maintain access to Avisford Grange during construction and upon completion of the scheme". He also stated that "Minimising the impact of our road schemes on any affected community or environment is of the utmost importance and will be especially important for Avisford Grange". It seems therefore that there is the intention by HE to maintain the access to AG and there is no need for this application, they are just trying to get access that was refused but trying this time

by using the grey route as an excuse! The pausing of work on the AG development was purely a commercial decision by the developer.

4. Non-compliance with existing Plans and Policies. Walberton Neighbourhood Plan policy GA5 (Traffic Management): "Proposals that significantly increase the level of traffic within the villages will be resisted". As discussed below, there will be an increase in traffic travelling through the villages of Walberton and Fontwell. The original access was granted after considering the traffic and there would be a substantial increase in traffic through the village if this planning application is approved, West Walberton Lane will become a rat run for traffic from AG heading up to the A27. West Walberton Lane is a rural country lane which is part of the cycle route from Felpham, it is not suitable for more traffic. As it currently stands, this lane requires some form of traffic calming measures or a serious accident will occur as there is currently insufficient room for a large SUV and a bus/HGV to pass.
5. This increase will also detrimentally impact on Walberton's two Conservation Areas. Arun District Council Local Plan policy T SP1 (Transport and Development): "To ensure that growth in the District... reduces congestion..." This policy states that support will be given to proposals that are supported by an effective and deliverable Transport Assessment". As set out below, we consider the Assessment to be fundamentally flawed. The application fails National Planning Policy Framework (NPPF) paragraph 110, which states that "safe and suitable access to the site can be achieved for all users". Our justification for this is detailed below.
6. Traffic issues : A. Fontwell roundabout -In their objection to WA/68/20/OUT, Highways England refers to Fontwell West Roundabout being currently over capacity. With their preferred Grey route, HE expressed concerns regarding movement of construction traffic following the closure of Tye Lane to the north. Using Tye Lane as a primary access for this development will result in similar issues.
B. Road width change -Tye Lane is significantly narrower than Yapton Lane for vehicle movements. The new application reduces Tye Lane to a minimum of 4.8m rather than 5.0m for approximately 25m. This would mean that an HGV and a car could no longer pass at this point (there is zero clearance for such vehicles). The values used for car widths by the applicant do not include allowance or wing mirrors so vehicles would have to mount pavements to get past each other, however a number of houses own land right up to the highway boundary and also they have no parking so vehicles are parked on the road, further narrowing the lane. The proposed cycle route from Avisford Grange leads down this narrowed route. This will also pose increased risks to cyclists from traffic trying to pass them.
C. Traffic flow diagrams -A number of Traffic Flow Diagrams are provided to illustrate changes in traffic flow patterns. However, they seem to have incorrect data, especially noting that the sole reason for this application is the presumption that the A27 Grey route is going ahead. This results in the closure of Tye Lane northbound and so all data demonstrating traffic heading north to the A27 is fatally flawed The 2031 base numbers used refer to 50 vehicles going northwards up Tye Lane (and therefore to a dead end) and 30 heading southbound from this dead end. As there is no reason for this degree of traffic to head into a dead end, it appears that this reflects a prediction for travel when the road has not been severed by the A27. These numbers have been added to the 'site traffic proposed flows' to generate the reports for increased traffic after developments have been built, where no traffic heads up the dead end. We presume that no traffic is indicated heading North out of the development as the road is impassable. The process of using the base number for 2031 for traffic (where Tye Lane would remain passable to the north) to derive a value for estate traffic gives meaningless numbers. The 2031 base numbers for The Street, West Walberton Lane etc. will be incorrect if traffic has been allocated to Tye Lane and the A27. There would appear to be very few vehicle users predicted for 175 dwellings. For example, the base traffic and additional from proposed developments indicate 70 movements leaving in the am peak, and 6 returning in the pm peak. Assuming only two residents per dwelling and all movements to be due to the Avisford Grange development suggests only 17% of residents (70 movements out of 410 residents) will travel during peak times to work or school. This is a completely inappropriate assumption based on national

data rather than a small village. There is minimal local employment so travel further afield is mandatory. The bus schedule presented is misleading – there are in total only 3 services per day from the 66A route and five on the 85 route, none on a Sunday. The traffic flow analysis also fails to reflect the situation on The Street in particular with regard to onstreet parking at school drop-off and pick-up times. Traffic is usually stationary at these times and finds it very difficult to pass especially around the Tye Lane junction. The 2011 census indicates that this Parish has almost double the West Sussex average for 3 and 4 car households and a third more than the average for 2 car households. Our conclusion is that more traffic than described in the flow diagrams will be using local roads unsuited for this level of traffic. An increase in traffic will result in increased local air and noise pollution.

7. The application changes the impact of the Avisford Grange development on the local environment and yet does not appear to include the required update in assessment of the impact on noise and air quality as required by Arun Policies QE DM1 and QE DM3 respectively. The application should be refused until correct information can be supplied, and the local impacts formally and properly assessed.
8. Construction traffic- With closure of the Yapton Lane access and no northbound Tye Lane access, all construction traffic will have to proceed via routes permitted to HGVs. The Street has HGV restrictions as do Wandleys Lane and Eastergate Lane. Lake Lane also has restrictions, precluding HGV access via Barnham Lane. This leaves only West Walberton Lane, a narrow residential road with poor surface, entirely unsuited to HGV traffic.

The conclusion is that traffic on The Street and local roads will increase dramatically above that described in this application. The application should be refused at the very least until correct information can be supplied, but the increased traffic and resulting noise and air pollution through the Conservation Areas combined with the premature nature of the application as outlined at the start of this objection should result in refusal and should AG require new access due to the A27 grey route this will be able to be provided through various properties already compulsorily purchased on Yapton Lane. The builder has already tried to get access via Tye lane so has already had this intention and is just using the possibility of the Grey Route to achieve their initial aim.

Yours faithfully

Melanie Guimaraens