



**WALBERTON PARISH COUNCIL
INCLUDING FONTWELL AND BINSTED**

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www.walberton-pc.gov.uk

Planning application WA/68/20/OUT - Land west of Tye Lane

Walberton Parish Council would like to register an **OBJECTION** to application WA/68/20/OUT. We have a number of serious concerns with this proposal.

Traffic

We are concerned that the proposal will result in unacceptable levels of traffic on roads incapable of sustaining this.

Traffic assessments have been provided as part of the application. We find these to be invalid for the following reasons.

- ◆ The assessments ignore the possibility of Tye Lane being closed at its northern extent. This is now considered highly likely with the announcement of Grey as the A27 bypass PRA as supported by Arun District Council and the developers are aware of this. Any traffic impacts without this consideration should be considered as of poor quality and not representative of the likely impact.
 - The distribution of travel was allocated as 68% of traffic travelling along Tye Lane North to the A27. This will not happen. 100% of traffic will need to proceed south along Tye Lane into Walberton village, including HGVs.
 - A proportion (20%) is considered to want to travel Eastbound on the A27; there will no longer be a convenient Eastbound option – Yapton Lane will have no direct access to the new A27.
 - The remaining traffic from this and the adjacent development accessing A27 needing to travel West would consider a direct route – either via West Walberton Lane through Fontwell village to the A27 or Eastergate Lane or Wandleys Lane to the A29 and A27. HGVs would have to go via Eastergate or West Walberton Lanes.
- ◆ The traffic modelling in section 8 also ignores the Tye Lane road closure and should be considered invalid.
- ◆ An assessment of Walking, Cycling and Horse riding was carried out on a single day, Tuesday 11th August. It was noted that there were no horse riders and no pedestrian movements north of the site.

- A single weekday, during peak holiday time, is not necessarily representative of the normal movements in the area.
- Movements were at that time reduced due to the good local adherence to Covid-19 recommendations
- ◆ Traffic surveys performed in February 2018 and March 2018 are unlikely to be illustrative, especially considering the A27 proposals.
- ◆ Traffic surveys performed in February 2017 and March 2017 are described as “around 3 years old” - now closer to 4 years old so increasingly out of date.
- ◆ A number of the documents are completely illegible regarding tables of traffic flow (for example Appendix J: Transport assessment) so we cannot interpret them fully.
- ◆ The report discounts A27 incidents on eastbound carriageway near the A27/Yapton Lane junction. In order to access Tye Lane in an eastbound direction a U-turn at the Yapton Lane junction is necessary, a riskier manoeuvre than a right turn, to head westbound and then turn off at Tye Lane. This discounting halves the incidents considered at the junction. The less risky route will bring traffic down Yapton Lane, along The Street – already congested - and up Tye Lane.
- ◆ For A27/A29 traffic we note the additional 4300 dwellings proposed on A29 Barnham and not considered here in the traffic modelling.

The transport assessments refer to the WSCC Local Transport Plan 3. Arun District Council’s implementation of this includes

- ◆ increasing use of sustainable modes of transport
- ◆ discouraging HGVs from using unsuitable roads

We are concerned that this implementation is contravened as

- ◆ Closure of Tye Lane forces HGV access to the site for construction to travel through Walberton village.
- ◆ Census information is that fewer than 7% of economically active parish residents use public transport to get to work.
- ◆ Bus services are mentioned as presenting an opportunity to encourage public transport; the poor frequency of the service is no encouragement.
- ◆ Reference to the cycle network in the proposals shows the bespoke new section towards Barnham and fails to discuss the northern official cycle route along West Walberton Lane which is unsuitable, dangerous and not fit for purpose.

Walberton Neighbourhood Plan Policy GA5 states that proposals that increase the level of traffic will be resisted particularly in the case of HGV movements. Adding 155 properties’ worth of vehicles will be a significant increase in traffic and all of it will need to pass through Walberton village.

We note vehicular trip generation counts have been used from the adjacent development – this will be in addition to those, estimated for this site at 766 trips per 12 hours.

Site access for construction and residents

- ◆ The site opposite, WA/95/18/RES (Land East of Tye Lane) was refused an access point onto Tye Lane; the reasons for refusal will be equally valid for this application as well.

Design and access statement

The statement notes that noise from A27 to the north is a constraint on the site. Given that this relates to the old A27 route and already poses a notable constraint, the new A27 preferred route would be expected to have a more dramatic impact.

- ◆ Houses in the north-eastern corner will be next door to an interchange. Noise from raised sliproads will adversely impact site, and will also impact visually on the site.
- ◆ Arun Local Plan Policy QE DM1 – noise pollution. Development in close proximity to the A27 needs to be supported by a noise exposure category assessment and show design regarding noise reduction. We note that the policy states, “Consider both the likely level of exposure at the time of application **and any increase that might reasonably be expected in the foreseeable future**”. The new A27 route is reasonably expected at this time.

Flooding and Drainage

WPC considers that its Neighbourhood Plan Policy VE 7 would be breached by any consent since the scheme does not aim to reduce the overall level of flood risk. Flooding takes place in The Street, and WSCC has LFRZ 004 covering an area of some 3.5 hectares. WPC is concerned that significant development is bound to worsen the existing problem and upset an already fragile local situation in an area with unpredictable ground conditions. High groundwater is noted in the site reports. Even with permeable driveways and roads, the footprints of the buildings will still have an impact on water flow.

HELAA

The application refers to the site as showing ‘deliverable’. However, they admit it also states, “Currently development on this site would contravene policy and therefore the site would not be considered to be suitable.” Although HELAA suggests in future it may be suitable, **this is not the future and so the current statement stands.**

The housing density suggested in HELAA is 146. This application is for 155 dwellings, so in excess of what has been considered to be suitable. We note that Arun District Council is only requiring 60 new dwellings as part of the current Neighbourhood Plan review and this and more has already been allocated. The housing density of the proposal at approximately 20 dwellings per hectare is significantly higher than that of the Parish. The Walberton built-up area boundary encloses 46.46ha. If all dwellings in the Parish are counted as being within this boundary (875) this would be a gross over-estimation of the existing density and yet the resulting figure is 18.8 dwellings / ha. This does not accord with Walberton’s N P policy HP11 – Housing Density.

Walberton Neighbourhood Plan

The developer challenges the use of an incomplete NP for refusal of applications. We note that we are further on than their report suggests. Our Reg 15 was submitted to ADC on 14th October 2020.

However, this site is also not within the current made Plan. Policy HP1 – Spatial Plan of the Parish – does not support this site as it is outside the built-up area boundary or one of the proposed developments. This is not a designated Strategic Site Allocation for Arun.

The subject site was one of 16 parish sites that were considered and consulted upon through Open Days and the Parish Survey as part of the revised NP. The site was overwhelmingly rejected by residents during WPC's systematic sequential testing of sites with 90.88% of respondents voting against this site.

WPC is extremely concerned that the cumulative effect of the strategic site of 400 dwellings at Fontwell, 175 homes at Avisford Grange (land east of Tye Lane) and its new Neighbourhood Plan sites together with the huge Barnham-Eastergate-Westergate and other nearby schemes will place a massive pressure on school places, GP and Dental waiting lists and other basic amenities that cannot physically be met in the timescales involved.

Arun Local Plan policies

- ◆ Policy SD SP2 - Development should be focused within the built-up area boundaries
 - This development is on a green field site outside the Walberton BUAB.
- ◆ Policy H SP3 - Rural housing and exception sites
 - This development does not fulfil these criteria, such as local housing need, or being appropriate in scale, form and character to the local settlement.
- ◆ Policy SO DM1: Soils – grade 3a agricultural land should be protected
- ◆ Policy ENV DM5 – Development and Biodiversity
 - Great Crested Newt survey is still required by ADC
 - No badger survey has been completed
 - The application is therefore incomplete at this time.

Walberton Parish Council
2 November 2020