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Thanks

-----Original Message-----

From: Sue Bowley On Behalf Of Planning

Sent: 16 November 2017 09:26

To: Planning.Responses

Subject: FW: To Mr J Baeza re: Representation/Objection to WA/73/17/OUT Land east of Wandleys Lane

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-----Original Message-----

From: 

Sent: 15 November 2017 20:58

To: Planning

Cc: Walberton PC Clerk; Suzanne Clark; Edmund Camerer Cuss

Subject: To Mr J Baeza re: Representation/Objection to WA/73/17/OUT Land east of Wandleys Lane

Dear Mr Baeza

Please find attached our objection statement with reference to planning application WA/73/17/OUT.

Kind regards

Pru & Paul Madeley

From: Priscilla and Paul Madeley
Woodlea Cottage
Wandleys Lane
Walberton
Arundel BN18 0QR

To: Mr J Baeza
Planning Department
Arun District Council
Arun Civic Centre
Maltravers Street
Littlehampton BN17 5LF

15th November 2017

BY EMAIL ONLY

Dear Sirs

Planning Application WA/73/17/OUT: Proposed Development east of Wandleys Lane and west of West Walberton Lane, Fontwell.

We apologise for the length of this representation but we believe this is a matter that deserves careful examination. We would like to register our joint objection to the above planning application on the following grounds:

1. THE PROPOSED DEVELOPMENT IS CONTRARY TO LOCAL PLANS

The proposed development goes against the Walberton Neighbour Plan, the ADC existing and emerging Local Plan and the HELAA 2017 (meaning the site has been assessed by the council's own planning officers as not developable/deliverable). The application is outside the defined built-up area boundary of Fontwell/Walberton. The proposal represents a significant encroachment into the countryside resulting in an adverse impact on the rural character of the area and loss of countryside.

From ADC's Housing Implementation Strategy March 2017 in the Local Plan, the council's approach is to invite applications on smaller developable sites in the short term. Allowing this development would be counter to ADC's own approach.

We understand that the location of this large site in such a sensitive place would not normally be considered by developers if the normal protection offered by the local plan currently existed, and ADC had a current 5 year housing land supply strategy. This enables unsuitable applications to attempt avoid the usual planning restrictions and seems to us to be an arbitrary and unfortunate way in which to settle planning decisions, contrary to local democracy.

As you will be aware, the Walberton Neighbourhood Plan was adopted on 8th March 2017. The housing development policies in the Neighbourhood Plan and the Arun Local Plan are considered out of date where ADC cannot demonstrate a 3 year housing land supply strategy as set out in the Ministerial statement of December 2016 , in which the Minister also stated as a basic principle:

'The Government confirms that where a planning application conflicts with a neighbourhood plan that has been brought into force, planning permission should not normally be granted.' (Neighbourhood Planning: Written Statement - HCWS346) . This principal is compromised by planning applications such as the one in question here.

The question therefore is whether the Council can demonstrate a 5 year land supply or, failing that, a 3 year land supply strategy which would offer protection against development on sites deemed undevelopable by ADC planners in the HELAA such as this one.

The Council has recently published an up-to-date five year housing land calculation relating to the proposed Local Plan which has recently gone through examination. We have read the inspector's report and the inspector finds no fault with the land supply strategy, only perhaps querying the rate of supply. We believe this must give greater weight to the emerging local plan.

Moreover, this is a relevant passage is from the National Planning Policy Framework (NPPF) para. 216, which allows for greater weight to be given to emerging local plans in decision making according to how advanced they are.

216. From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

We contend ADC's plan is sufficiently advanced to allow local plans to again determine local planning decisions. It is clearly the council's view in the local plan that they are close to a 5 year land supply strategy, which is considerably more than the 3 year target set by Ministerial Statement of Dec 16.

A previous ADC calculation of 1.9 years land supply must now be outdated. We contend that planners and decision makers need, and should ask for updated land supply figures in order to properly inform their decision, because there has been a further number of planning decisions which have improved the housing land supply since the inspector's report in March 2017.

Even without this housing land 3 year supply consideration, the application would need to be considered in the context of the presumption of sustainable development as maintained by the applicant within their Planning Statement. This is the next ground for our objection.

2. THE PROPOSED DEVELOPMENT CANNOT BE CONSIDERED SUSTAINABLE:

i) ECONOMIC SUSTAINABILITY

The economic benefits put forward - of construction jobs, increase in the number of tax payers and more residents using local businesses, are unexceptional and would be true of any development and therefore there are no specific economic benefits of this proposal. The development is for housing, it offers no business or employment type uses and therefore has no meaningful or long term economic benefits.

In summary we would strongly contend that the site cannot be considered sustainable development since it offers no tangible long term economic benefits, has just one social benefit of increasing housing although it is poorly located housing and has only negative environmental impacts.

ii) SOCIAL SUSTAINABILITY

The proposal provides for housing which is considered to be a social benefit. Whilst this is the case, no other social benefits are apparent. Rather, the provision of housing places greater strain on existing social infrastructure.

The proposed development is located in an unsustainable location, poorly related to existing services and facilities. Fontwell currently has no reliable commuter public transport (the infrequent bus service could not be considered as such), reflected in the low percentage of those using public transport (7%) to get to work. The traffic problems and allied environmental implications of air pollution and noise are clear, as car use would be set to increase greatly in the vicinity.

LACK OF LOCAL FACILITIES/SERVICES. There are no adequate facilities such as shops, schools and GP surgeries in Fontwell village or within what most people would consider walking distance.

Here are the relevant distances (Source: Google Maps) :

Shortest route from centre of proposed development to:	
Croft Surgery, Barnham Road (nearest GP surgery)	2.1 km
Walberton Surgery (part-time)	2.1 km
Ormiston Academy (nearest secondary school)	2.25 km
Eastergate CE Primary (nearest primary school)	2.4 km
Walberton shops and dental surgery	2.1 km
Barnham Railway Station (shortest route via West Walberton Lane)	3.7 km

The shortest route in each case means walking/cycling along sections of the unlit or partially lit, unpaved roads of Wandley Lane (south western part) and West Walberton Lane.

The four shops on the parade in Fontwell (mentioned by the applicant as an amenity) are specialist outlets and do not have wide appeal. At time of writing these shops comprise Detectniks (metal detection supplies), David Kibble (wine sales), The Making Room (craft supplies) and a vacant premise. A petrol station sells a limited range of domestic and motor related goods (at relatively high prices) but there is no village shop at Fontwell from which to buy fresh food.

Realistically, the lack of local facilities/services means that the potential 400 + new residents will be forced into cars to make the vast majority of daily journeys, reducing the quality of the environment for all residents, making the location of the site clearly unsustainable.

LACK OF ADEQUATE PUBLIC TRANSPORT IN FONTWELL. The lack of local facilities would not be such a concern if there were excellent public transport facilities in the area. However, the bus services in Fontwell are infrequent by the applicant's own admission, with only one service, coming 3 /4 times a day to Arundel or Chichester. This level of provision is woefully inadequate to serve an extra 400+ residents and in combination with the lack of local services further highlights the unsuitability of the location for housing.

The shuttle bus service proposed by the applicant lacks any firm detail and WSCC's transport consultation (by Stephen Gee 17/11/17) points to a lack of information from the applicant on this matter. There is no present guarantee of such a future service (which may or may not indicate the difficulty involved in providing it) and, whilst we do not wish to be cynical, it is possible that this promise could be a hollow sweetener to counter the plain fact of public transport inadequacy to the site.

As mentioned below, the train station is located at distance from the site (3.7km) and it is highly probable that residents would not be willing to access this form of transport by foot.

PRESSURE ON LOCAL SERVICES. We are concerned about the cumulative effect of further large scale development upon local services such as schools, GPs and dentists, especially in the short/medium term. Personal experience over 27 years residence, informs us that it is increasingly difficult to arrange a GP appointment in advance and our surgery (The Croft, Barnham Road) is now promoting telephone consultations as a strategy to manage demand. To preserve quality of life for existing residents which implies access to vital services, further 150+ dwelling proposal should be rejected.

iii) ENVIRONMENTAL SUSTAINABILITY

The consequent environmental impacts are all negative. We have great concerns about the impact on the rural character of the area, on flood risk, on ecology and wildlife, on transport, and these are considered in the following paragraphs. We also consider the site to be very poorly located and any future residents would be dependent on driving as set out in the next section.

ROAD SAFETY ISSUES. There are several reasons for regarding Wandleys Lane and the surrounding road system as unsuitable for any kind of housing development like the one proposed.

UNSUITABLE/HAZARDOUS ACCESS. Regarding the access directly into Wandleys Lane, we note that the Dandara development at Fontwell Fields had its application for vehicular access into Wandleys Lane turned down by WSCC Highways on the grounds that the lane is unsuited to further traffic and that it would pose an accident hazard. We cannot see how that judgement does not apply equally to the Welbeck scheme, which would involve a greatly increased amount of traffic generated by 150+ extra dwellings.

Further, in WSCC's consultation response (by Stephen Gee 7/11/17), concludes:

'An objection to the proposal is raised: adequate information has not been submitted to satisfy the Local Planning Authority that the proposal is acceptable in terms of access and would not therefore give rise to increased hazard for road users.'

UNSUITABILITY OF WANDLEYS LANE. Wandleys Lane is wholly unsuited to a great increase in traffic due to its narrowness (2 cars cannot pass in places without one taking the verge and 2 lorries would cause a jam) and a potentially dangerous, blind bend not far from the proposed entrance to the proposed new development on the south western section (we have personal experience of the frequency with which some vehicles take this corner without due care).

Although the applicant intends to widen Wandleys Lane at the north eastern end from the development entrance to the junction with West Walberton Lane, with provision for a pavement, there will be no improvement to the longer south western part of the lane which is in equally poor condition. Neither have they provided evidence to show that road users will always use the improved section rather than the old part when the nearest route to many habitual destinations is via the unimproved section.

It is unrealistic to argue that traffic, walkers, cyclists and horse riders will choose to use the north eastern route rather than the south western when many useful facilities [The Croft GP surgery, 3 schools at Eastergate and Aldingbourne, a convenience store (Elm Tree Stores) and, of course the road to Bognor and an alternative (to the A27) route to Chichester and beyond] lie in the direction of the A29 junction with Wandleys Lane.

The rational view must be that school children and others will inevitably choose the shortest route where there is no footpath, representing a real risk of injury. The lane is also frequented by horse riders adding to the hazards. Wandleys Lane has a current speed limit of 30mph, which in our opinion, is itself too fast for several sections of its length if safety is a consideration.

The connecting roads of Wandleys Lane (at the long south western end) and West Walberton Lane are unsafe for walkers and cyclists due to lack of pavements, narrowness and poor lighting. These roads are not maintained as cycle routes and do not encourage the use of non-vehicular transport.

The fabric of the South Western section of Wandleys Lane is unlikely to be able to handle the increased load, especially when one considers the extra goods delivery vehicles which will also be generated (including lorries going to the building site which will have unrestricted access to the south western approach).

The junction of Wandleys Lane with West Walberton Lane is considered in the applicant's Transport Assessment Sept17 (ref 38848/5501) and its conclusion is that, 'the effect of the proposed development is not significant at this junction and that no mitigation works are required...' We believe this is misleading because West Walberton Lane is a similar narrow road and the junction occurs at 'blind' bend in it. The view of oncoming traffic at this spot is highly restricted, making it a hazardous spot (confirmed by many years of personal experience), particularly when turning right across the flow of the oncoming traffic into Wandleys Lane, a manoeuvre that would increase many times in frequency if the new development were built, thus increasing the risk of accidents.

INCREASED FLOOD RISK AND DRAINAGE ISSUES. At present the open field space provides a large rain water soak away. Given that there will now be up to 400 new dwellings at Fontwell Fields, the cumulative effect of another substantial development in Fontwell could mean a tipping point for future floods, due to the further potential increase in non-permeable land surface.

There is evidence of a current problem with drainage capacity which cannot be quickly remedied, especially considering the extra load which will be imposed by other new housing in Fontwell and Arun in general. According to ADC's Housing Implementation Strategy March 2017, Southern Water has stated that there is insufficient capacity within the current Lidsey catchment area for new demands.

This is from the Arun District Local Plan Housing Implementation Strategy – March 2017:

4.13 The significant constraint to the delivery of housing in the District is waste water. Southern Water have confirmed that constraints particularly relate to the Pagham and Lidsey treatment works and Strategic Site Allocations in proximity to these could not be fully delivered until such time as upgrades have been implemented. They have indicated that there is limited scope for upgrading these sites...

DAMAGE TO RURAL CHARACTER. At present Wandleys Lane has a predominantly rural character (narrow country lane bordered by many mature, closed canopy trees) and we believe that this proposal can be considered an overdevelopment of the area, out of character with its surroundings.

Regarding the proposed north western end road widening, a WSSC Council Highways report described Wandleys Lane as an historic rural lane which should not be modified or used for access to a new housing development, even for an emergency access.

The applicant proposes that Wandleys Lane (at the shorter north eastern end) would be widened to 6 metres with a 1.8m pavement on the North side which would be continued to the site entrance. This could not be done without extensive removal of hedges and trees, and damage features which give the lane its distinctive rural character. We believe that this is an unreasonable imposition upon current residents and should be further grounds for refusing this application.

The density and layout of the proposed development is out of character with its surroundings and would detrimentally change those surroundings for ever. The proposed development may not be out of place in a suburban setting but here it definitely is.

LOSS OF AMENITY. The proposed site is an area of natural beauty and value, a green space bordered by ancient woodland and hedges, both useful habitats for wildlife. It is not intensively farmed unlike much surrounding farmland. Sheep graze in late winter, the meadow is ablaze with buttercups and other flowers in spring (food for foraging insects), hay is harvested in the traditional way in summer after which flowers bloom again. It is true that it is not a rare traditional, ultra-diverse meadow habitat but it certainly has value for wildlife and we have watched various species there including a small group of roe deer, bats, buzzards (resident for many years), hedgehogs and swallows in summer. Losing the field would be a loss to the village countryside and the another sad loss of a green space in this area.

We, at Woodlea Cottage, would be particularly affected by this development and, whilst we claim no natural right to be insulated from development, it would cause a great change in our circumstances. We are the closest of all existing properties from the site; our main room windows (lounge, dining room) are just 2.5m from the boundary hedge with 3 other rooms a little further back. The applicant's own assessment states that Wandleys Lane residents will have a 'high susceptibility to change' (Landscape Character and Visual Impact Assessment, Sep17, ref:2727-RE-01_P1), and we believe ours would be the most severe.

Our main garden area borders the field so that as well as the house windows, it would be very overlooked by the nearest site houses causing an onerous loss of privacy. This would contrast with a much wider gap on south western fringe of the site. Whilst other properties bordering the field have longer gardens, they too would suffer loss of privacy and amenity therefore the applicant's proposal should allow for a much wider buffer zone with existing properties. This could be done by cutting housing density and removing all the proposed housing closest to existing housing in Wandleys and West Walberton Lane.

CONCLUSION

We believe that there is evidence to show that ADC has progressed towards a 5 year housing land supply and therefore the site should be considered within the context of the ADC local plan and the Walberton Neighbourhood Plan which exclude the site from development. The latter is a validated plan meaning that only 3 years supply need be demonstrated.

In addition, the emerging local plan, which would exclude this site from development, has passed through examination and, according to the NPPF report quoted earlier, should duly carry greater weight in coming to a planning decision. The local plan's designation of the site as being countryside, outside the built-up area boundary should, therefore, mean that the application is refused.

Aside from this consideration, we hope we have made the strong case for this proposed development being unsustainable and wholly unsuitable for development. It is located in an isolated area with poor public transport links and access to services, there would be increased risk of flooding, greater strain on public services, damage to ecologically sensitive parts of Fontwell and its rural character, road and access problems are insurmountable, and there is very limited economic benefit to the community. Please refuse this planning application.

Yours sincerely

Priscilla and Paul Madeley