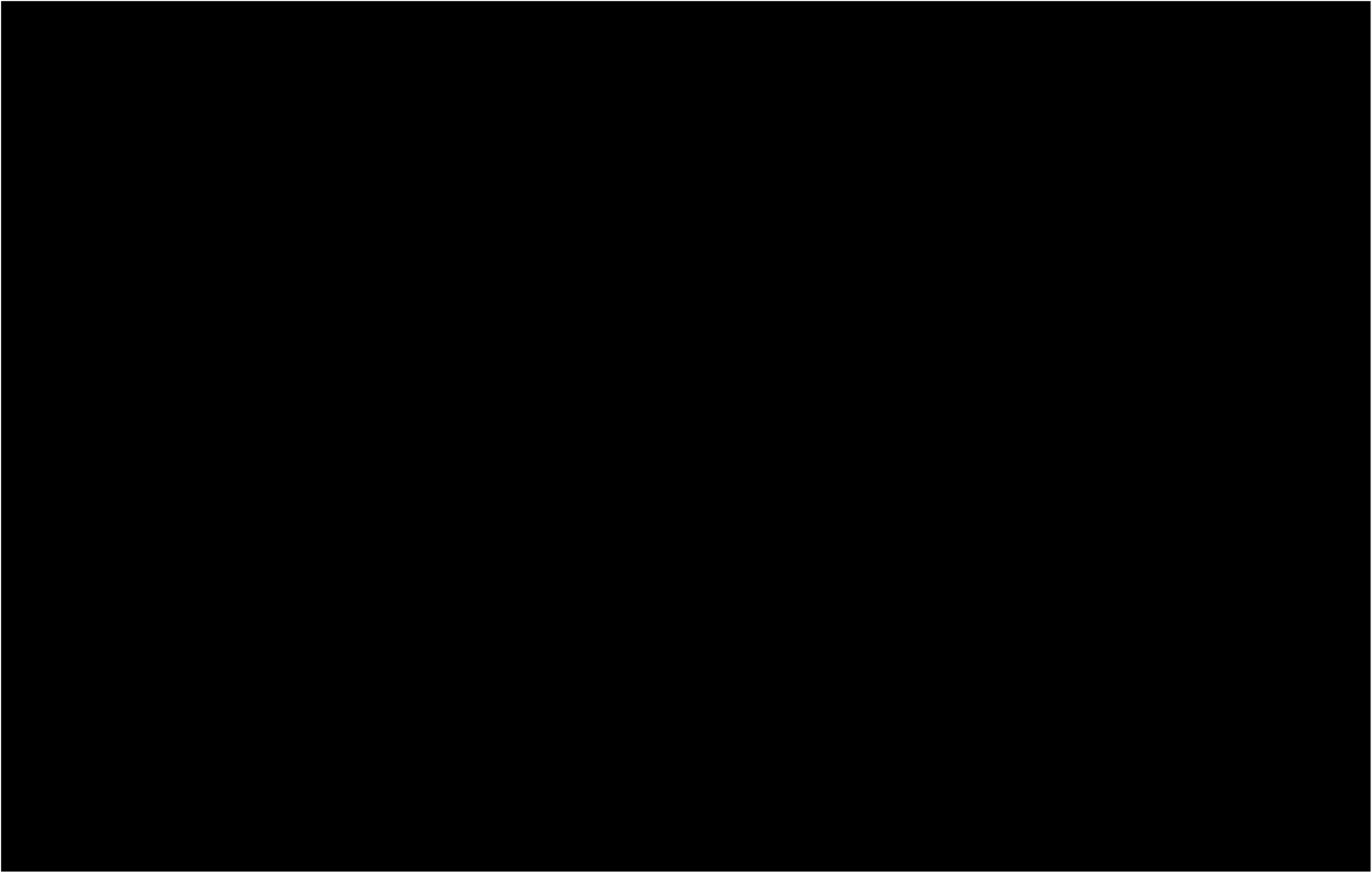




From: Andy Pepler [REDACTED]
Sent: 15 November 2017 10:08
To: Planning
Cc: Edmund Carmerer Cuss; Suzanne Clark
Subject: WA/73/17/OUT - Walberton PC objection

Dear sirs

Please find attached Walberton Parish Council's objection to the above planning application.

Thank you for registering this.

Andy Pepler - Clerk - Walberton Parish Council
[REDACTED]

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WPC Grounds for Objection

WPC objects to the application on the following grounds.

1. In respect of Saved Policies from the 2003 Local Plan
2. In respect of Policies in the emerging Local Plan
3. In respect of Walberton Neighbourhood Plan Vision, Objectives and Policies
4. Detailed Additional Objections

1 Saved Policies from the 2003 Local Plan

Relevant saved policies that indicate permission should be refused include GEN: 2; 3; and 23. The site is outside the BUAB.

2 Policies in the emerging Local Plan

Relevant eALP Policies are:

1. **SD SP1 Sustainable Development** references the NPPF, several of whose paragraphs conflict with the grant of permission and / or support the WPC's NDP in its resistance to permission being granted:
 - i. **Para 16:** WPC's approach in its WNDP, which this year was made with up-to-date policies that strategically supported the eALP, was very positively supportive of housing development, allowing for very significant housing development (27% parish housing provision uplift), shaped and directed to maximise overall sustainable benefit, but with policies that excluded this site's development.
 - ii. **Para 55-8** expects development to be properly integrated into the existing housing and amenities fabric, which the plans for this site do not achieve.
 - iii. **Para 100-103** indicate that sequential testing of sites should be used to avoid flood risk areas: Fontwell village is one of two parish areas at risk of flooding and unusual ground conditions. LPAs must "ensure" i.e. not assume, that flood risk is not increased elsewhere. The WSCC Lidsey SWMP indicates that development is not currently suitable for this site when other strategic sites and sites with consent are taken into account. Incontrovertibly, risks will be increased by development.
 - iv. **Para 109:** the planning system should contribute to and enhance the natural and local environment in a number of specified ways
 - v. **Para 155** stresses that LPA engagement and collaboration with the community under a Local Development Plan, that then reflects the collective vision, is an essential point. The positively-prepared WNDP excludes this site from development. It will be remembered that the WNDP, made only five months ago, was voted in by parishioners supported by 96% on a record turnout for ADC and one of the highest nationally.
 - vi. **Para 183-5** Covers Neighbourhood Planning, building on the comments WPC makes below regarding the WNDP.

2. **SD SP2 Built Up Area Boundary.** Development will not be permitted outside the boundaries on the policy maps. This site is outside the ALP 2003 BUAB and the eALP BUAB and is outside the WNDP BUAB.
3. **C SP1 Countryside.** The countryside will be safeguarded for its own sake. WPC contend that the scheme is, additionally, isolated from the village while the rural-urban fringe and countryside transition aspects would also be offended by this site's development, just as they offend against the WNDP.
4. **LAN DM1 Protection of Landscape Character.** Development should respect and reinforce landscape character.
5. **H SP2 Strategic Site Allocations.** The WNDP not only accommodates a strategic site at Fontwell, designated under the eALP Modifications, but fulfills its parish allocation. The allocation and the Fontwell site increase the community of the parish, currently in some 924 houses, by 454 houses, a 49% uplift with an early years bias. The WNDP is fully up-to-date in its housing policy and numbers and housing strategy in line with Supreme Court judgements and matches the strategic aims of the eALP, being based on an OAN identified by the eALP Inspector in February 2016, a year before the WNDP was made. No additional allocations have been made that are unmet.
6. **W DM1 Water Supply and Quality.** The dire state of the water supply, sewerage and flooding situation in the area of the site is spelt out in the eALP at section 18.2. WPC has for a long while argued that it is the inadequate standards that have been applied to development scenario testing that are partly responsible. The top of West Walberton Lane remains a Priority Wetspot for WSCC. See Appendix 2B, WSCC Surface Water Management Plan Appendix C Master Storyboard extract LFRZ 1 for West Walberton Lane. WPC considers that with the frequently unpredictable outcomes in this area, any development will increase flood, sewage and drainage risks to an unsatisfactory degree. ADC will not - as is required - be able to *ensure* satisfactory outcomes. Other ADC area developments outside the WPC parish area, besides the 454 new houses in the WPC community, must all be taken into account, cumulatively, in the decision-making.

3 Walberton Neighbourhood Plan Policies and Objectives

The subject site was not put forward as one of 19 parish sites that were considered and consulted upon through Open Days and the Parish Survey. However it would have failed several of the WNDP steering group criteria for development, including those as to size, location, flooding, access and traffic.

The WNDP included other and more acceptable sites, including a strategic development site for 400 houses very nearby. The WNDP is up-to-date as to housing numbers, as above, and as to its policies and its redrawn BUABs and as to its housing strategy and as to ADC's strategic intentions in the modified eALP.

1. **Against WNDP Objectives and Vision**
WPC's Neighbourhood Plan allows for a 49% increase in our community's size, showing the positive approach that it takes to its consideration of new schemes. WPC's policy is to support the dispersed small scale development for which parishioners voted. However this is a very substantial scheme, quite

contrary to the approach supported. The scheme also offends against the WPC stated Objectives and Vision because it will

- i. Not provide sustainable housing that makes a positive contribution to the village landscapes
 - ii. Harm the distinctive and intrinsic rural character of the area which parishioners have voted to retain and not recognise the value of the farming landscape
 - iii. Add to the congestion in Fontwell village and additionally will add to through traffic
 - iv. It will exacerbate the problem of flooding
 - v. Will be development on open land and fields, to which there is overwhelming opposition.
2. Against WNDP Policies
 - i. The subject site is not a site for which specific provision is made for housing development in the WNDP, and **Policy HP 1** is clear that WPC will resist such development; the site lies outside the Built Up Area Boundary, boundaries that the WNDP has adjusted elsewhere in Fontwell but not here.
 - ii. The site's development would also offend against **Policy GA 5**, where "Proposals that significantly increase the level of traffic within the village will be resisted" Fontwell village has some 200 houses and an application for 150 houses is very significant, even if the Dandara development goes ahead that would increase parish housing in Fontwell by another 150 units. WPC notes that some 70% of the increased traffic (the scheme allows for over 400 cars) will route through Fontwell village, unlike the Dandara scheme.
 - iii. WPC considers that its **Policy VE 7** would be breached by any consent since the scheme does not aim to reduce the overall level of flood risk. 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.

4 Detailed Additional Objections

1. In the current HELAA, where comments are a material consideration, the site is listed as Not Currently Developable. The entry reads in part
 - i. Constraints: Lidsey treatment catchment; groundwater flooding
 - ii. Suitability Summary: Constraints related to the site access and potential impacts upon Lidsey Catchment. The site is also considered to be too remote from the existing village to be sustainable.
2. Transport: In eALP para 3.47 ADC says that many of Arun's roads are congested and that improvements to the local road network are required to support new development. In 3.48 ADC says its planning policies can do much to minimise additional car traffic by reducing the need for car use and promoting public transport walking and cycling. Unfortunately two features are missing from the applications documentation: first, given that car ownership has a significant effect on car usage, the parish has 50% more two-car households than the national average and well over twice the national

average of both three and four car households and conversely only a quarter of the national average with no car. Second, many of these with no car may be pensioners since the parish population is of well above average age. While the transport studies are too technical for us to comment on, WPC believes that these two features are among those responsible for the wholly unrealistic outcomes that the studies deliver.

3. Census information is that fewer than 7% of economically active parish residents use public transport to get to work, another feature WPC expected to see but could not find reflected in the studies.
4. Rather than ADC's planning policies promoting public transport to e.g. Barnham, it has just been demoted, by the cancellation of one of Fontwell's remaining bus services; the village has no commuter public transport. The inadequate parking at Barnham station will prompt a good proportion of existing longer-distance commuter trips by car, and this situation is due to worsen. Commuter access to and from Fontwell and Walberton is sketchy and inconvenient and cannot replace more than a tiny percentage of trips.
5. Cycle routes, even when lit, can only be reasonably used in certain times of the year leading to even more of an increase in the winter months. And they are not suitable for WPC's above-average age population. West Walberton Lane is unlit, unpaved, does not allow two HGVs to pass abreast in places, and is not maintained as a cycle route.
6. References to public transport for commuting are entirely theoretical. There are currently no regular bus services useable by Fontwell commuters, at all, and references to them in the application are totally illusory.
7. WPC is concerned that the cumulative effect of the strategic site at Fontwell and its Neighbourhood Plan sites together with the huge BEW and other nearby schemes will place a facilities demand for school places, GP and Dental waiting lists and other basic amenities *that cannot physically be met in the timescales involved*. Although appropriate s106 contributions may be secured, the infrastructure will not be able to be put in place by the various agencies before the houses are built, because of the rush to deliver the five year housing target. That is to say that the paper financial exercise may work in theory in the longer term but it will still completely fail existing and new residents in the short / medium term.