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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Amber Willard <Amber.Willard@arun.gov.uk>
Sent: 07 October 2026 08:19
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: WA/98/26/DOC — Objection to discharge of Condition 5: Construction and Environmental Management Plan

Please upload as objection for WA/98/26/DOC

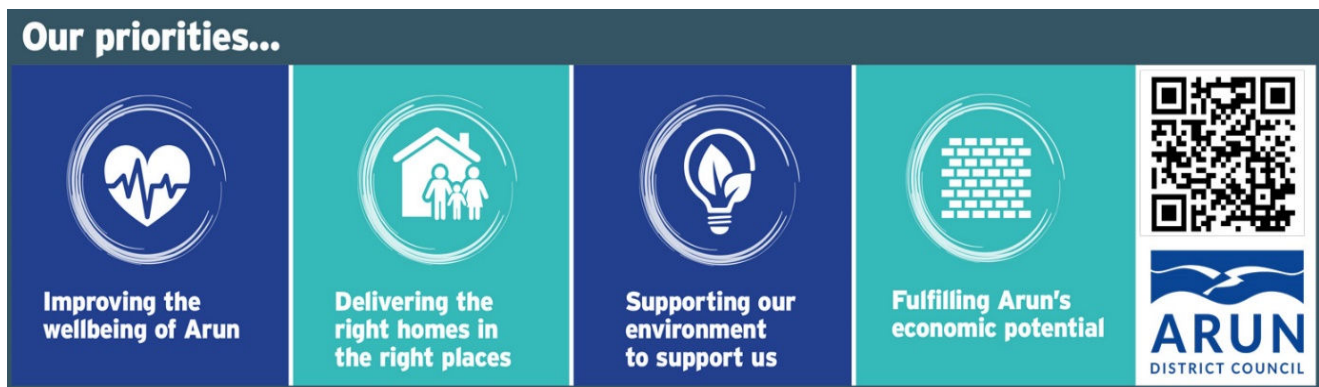
Amber Willard MRTPI
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From: Residents of Walberton - RoW [REDACTED]

Sent: 06 October 2026 09:53

To: Amber Willard <Amber.Willard@arun.gov.uk>; Cllr. Mel Penycate <Cllr.Mel.Penycate@arun.gov.uk>; Cllr. Sue Wallsgrove <Cllr.Sue.Wallsgrove@arun.gov.uk>; Shona Turner [REDACTED] [REDACTED] Jonathan Best <Jonathan.Best@arun.gov.uk>; Mark Warwick <Mark.Warwick@arun.gov.uk>

Subject: WA/98/26/DOC — Objection to discharge of Condition 5: Construction and Environmental Management Plan

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Dear Officer Willard,

Please register this email as my objection to approval of the Construction and Environmental Management Plan (CEMP) under Appeal Condition 5 in WA/98/26/DOC. Please also place a copy on WA/97/26/DOC insofar as it concerns construction and drainage dependencies.

Although the supporting documents for WA/97/26/DOC and WA/98/26/DOC are recorded on the portal as uploaded on Thursday 1st and Friday 2nd October 2026, my checks indicated that they did not become publicly accessible until approximately 11am on Monday 5th October. This reduced the time available for residents to review the submissions and provide informed comments.

I have reviewed CEMP Parts 1 and 2, the corresponding CEMP under WA/97/26/DOC and relevant supporting drawings. Although these contain substantial construction and ecological controls, they do not yet demonstrate a coordinated working arrangement or provide all the information expressly required by Condition 5. I request that the submitted details are not approved until the following matters have been resolved.

This objection concerns construction management and its environmental effects. References to drainage, ecology and the NMA identify dependencies affecting the proposed construction arrangements.

Page references below are PDF pages unless otherwise stated. The Ecosupport report is appended within CEMP Part 1.

1. Governing documents and consistency between applications

The submitted documents use different development layouts. Ecosupport Figure 2 (page 26) identifies C9_23_38_PL_101_P2, whereas Part 2 uses C9_26_03_PL_101_P4. The Biodiversity Protection Zone plan (page 64) retains the earlier southwestern pumping-station location, while drainage drawing 000-BPC-WD-ZZ-D-C-010 P01 shows the station beside the surgery.

Please identify the approved scheme against which the construction details are being assessed, taking account of any decision on WA/89/26/NMA, and reconcile the construction, drainage, ecological and landscape drawings with that scheme. I maintain my objection to WA/89/26/NMA of 18th September 2026.

Your email of 15th September acknowledged that the acoustic and biodiversity information then submitted did not relate to the current approved plan and required assessment against the approved plans. Please explain how that coordination issue has been addressed in the present construction proposals.

The CEMP's introduction quotes biodiversity Condition 17 but attributes it to WA/52/24/RES. The Ecosupport cover on page 20 identifies Condition 18, while its introduction and conclusion identify Condition 17 of WA/2/22/OUT. Its cover is dated September 2026 and marked "Final", but running headers state June 2026. These references and issue details should be corrected. Inclusion of a biodiversity CEMP within this submission should not be treated as evidence that the separate approval required by Condition 17 has been obtained.

The outstanding NMA and DOC applications need a coordinated assessment. WA/89/26/NMA proposes changes to the development layout, while WA/85/26/DOC, WA/97/26/DOC and WA/98/26/DOC seek approval of details governing its implementation. Please distinguish the existing approved scheme from the amendments sought under the NMA and identify which layout each submission relies upon. The assessment should establish whether the proposed amendments and condition details are compatible, whether the necessary information is supplied across the complete document set, and what remains missing or contradictory. Where a DOC relies upon an amendment proposed through the NMA, please explain how that dependency will be resolved before approving the details concerned.

That assessment should also establish whether the submissions, considered collectively, actually provide the detailed information required by the relevant conditions. Cross-referencing another application does not resolve an omission where the necessary method, specification or safeguard remains absent or inconsistent across the document set. Please identify where each necessary detail is supplied and which determination will assess and secure it. Any unresolved gap should be addressed before approval of construction arrangements that depend upon it, so that separate decisions do not leave essential matters unanswered between applications.

Both covering letters dated 29th September address Conditions 5, 26, 27 and 28, whereas the portal identifies WA/98/26/DOC as concerning Condition 5 and WA/97/26/DOC as concerning Conditions 26, 27 and 28. Please confirm the scope and document set relied upon for each determination.

The CEMP's introduction describes the residential development and associated infrastructure without expressly identifying the surgery. Please confirm that the CEMP covers the construction activities required for the whole permitted development, including the surgery and its associated works.

The two published CEMP copies also contain inconsistent redactions. General mammal-protection

measures (page 42) and an ecological reporting requirement (page 43) are readable in WA/97/26/DOC but obscured in WA/98/26/DOC. The method-statement listing on page 40 also differs.

I recognise that sensitive ecological information may require protection. Nevertheless, readers of WA/98/26/DOC alone should be able to establish the non-sensitive construction safeguards proposed for approval. Please explain the differences, confirm that assessing officers and relevant consultees have the complete report, and publish a consistent public version with complete appendices and clear issue details.

2. Construction vehicles, parking and site logistics

Condition 5(f) expressly requires the number, frequency and types of construction-related vehicles. Section 5 provides delivery-management commitments and promises 32 parking spaces, but I have not identified an indicative assessment addressing that separate requirement. Please provide typical and peak vehicle movements, including deliveries, plant and waste collections, related to the main construction phases.

Part 2, drawing C9_26_03_PL_101_P4, labels parking areas for 12 and 20 vehicles. The red outline labelled “Parking for 20 Vehicles” encompasses an area shown on the underlying residential layout as eight parking bays and their associated circulation and manoeuvring space. It does not demonstrate how 20 vehicles would park while retaining sufficient space to enter, manoeuvre and leave.

The area labelled for 12 vehicles similarly lacks a drawn temporary parking arrangement demonstrating the stated capacity. Please provide a dimensioned layout showing all 32 spaces, the vehicle sizes assumed, access aisles and turning arrangements. If a temporary configuration different from the underlying residential layout is intended, it should be shown explicitly.

A coordinated, scaled site-setup plan should also show loading and unloading, cabins, plant and material storage, soil stockpiles, waste collection, refuelling, security fencing and gates. It should explain how these facilities will operate together and be maintained or relocated through subsequent phases.

Sections 5.7 and 8 describe wheel washing, including a power washer before the entrance, hardstanding and sediment controls. Please show its precise location, wash-water management and availability during initial works and later phases. Please also demonstrate how deliveries and waste collections will avoid obstructing Yapton Lane or protected areas.

Section 5.1 states that all construction traffic will use the entrance on Yapton Lane and that suppliers will receive a route map. Please identify the precise entrance on the coordinated site-setup drawing, provide the external routing, and explain how that entrance will be formed and used from the first operation.

Part 1 identifies Appendix 2 as “DP250 CDM LAYOUT”, while the supplied annotated sheet retains the residential Proposed Site Layout title and number. The construction layout should have a clear drawing identity and issue/revision status.

3. Programme and ecological prerequisites

Condition 5(a) requires an indicative programme. Contractor Section 1.3 lists principal work stages without indicative dates or durations. Please provide a proportionate programme showing the anticipated sequence and duration of the main stages, connected to the ecological methods and protection requirements for the actual work areas.

Ecosupport section 5.6 specifies licensing, fencing, at least 30 trapping days and at least five negative capture days, followed by the relevant searches and clearance. Section 5.10 requires monitoring to begin at least one month before construction. The programme should identify when the applicable prerequisites will be completed and checked before access formation, compound installation, earthworks and drainage operations begin in each affected area.

Dormouse timing also needs clarification. Section 5.7.2.1 refers both to clearance from early May and to late April–mid-May or October, while Table 9 specifies early May. Please obtain a consistent instruction from the project ecologist and incorporate it into the programme alongside the reptile and nesting-bird measures.

Please also demonstrate the relationship with Appeal Conditions 14 and 15 and Reserved Matters Conditions 4 and 5, including the required arboricultural confirmation before machinery is introduced or construction takes place.

The concern is that the programme identifies and accommodates the prerequisites applying to each physical activity; it is not that every separate licence or approval must necessarily precede determination of this application.

4. Ecological fencing, retained trees and pedestrian passage

I acknowledge the updated walkover of 7th May 2026, the recorded habitat changes and the additional reptile working methods. My concern is how these findings and safeguards are applied to the governing layout, access, working areas and retained habitats.

Please read this alongside my Condition 16 comments of 14th September and Jonathan Best's consultation response of 11th September. The construction issue is whether habitats to be retained, protected or created are consistently identified and safeguarded during the proposed operations.

Figure E4a, the Capture and Exclusion Map dated 16th July 2026 (page 66), identifies temporary amphibian fencing and trapping. The written methods also require HDPE exclusion fencing to remain during construction. Please identify its alignment and relationship with temporary amphibian fencing, security fencing, tree-protection fencing, gates and working areas.

Section 5.6.2.2 describes a barrier buried to a depth of 250mm. Installation therefore needs to be coordinated with retained roots. Reserved Matters Condition 4 addresses root-sensitive fence installation, and Condition 5 refers to the approved ECO9 protection plan. However, Ecosupport Appendix 4 (page 72), headed "Tree Protection Plan", contains no drawing. Please supply or expressly identify the operative tree-protection drawing and demonstrate compatibility with it.

The coordinated plan should distinguish the existing physical path associated with P23, the alignment claimed through the current DMMO and the proposed improved route. Drawing 018 P00 provides Rural N/S engineering profiles with existing and proposed levels; it does not, by itself, establish that these represent the existing walked or claimed alignments.

Please explain how pedestrian passage will be maintained, managed or lawfully restricted during construction, including any temporary route, duration, signage and separation from vehicles. I recognise that the pending DMMO does not itself determine legal status.

I have not identified an approval of the details required by Appeal Condition 23. Drawing 000-BPC-WD-ZZ-D-C-010 P01 describes the rural path as “Bound Gravel/Cellweb (INFILTRATION)” and refers to “Std Details”. Please confirm whether this notation relates to P23 and identify those details and any existing Condition 23 approval. Where P23 details are relied upon for the construction or drainage assessment, please identify what is being assessed in the present applications and what remains for separate approval. Approval under Conditions 5 and 26–28 should not be treated as itself discharging Condition 23.

The page 64 plan identifies a southeastern receptor area, while section 5.6.2.4 describes release into woodland beside the allotments. Please reconcile its extent with existing pedestrian use, the cabin/working area near the entrance and the intended public-exclusion measures. Where sections 5.2.2 and 5.6.3 rely on S106 or covenant protection, please identify the relevant provision or proposed mechanism and timing.

5. Approved LEAP and LAP

My NMA objection of 18th September raised the discrepancy between the separate approved play areas and their combined depiction on general layouts.

Reserved Matters Condition 1 expressly approved ELVS24539 21 Sheet 1 Revision A. Its revision dated 17th January 2025 records “LPA comment LEAP & LAP separated”. The combined depiction nevertheless appears in Figure 2 (page 26), the protection plan on page 64 and the CEMP Part 2 site plan.

Please confirm whether the approved detailed play drawing remains operative and demonstrate that working areas, protection zones, landscaping and the construction sequence accommodate it. The combined outline alone does not establish that the separate play areas or particular equipment have been removed. The issue is whether the general layouts are compatible with the governing detailed arrangement; that compatibility should be demonstrated before the construction arrangements are approved.

6. Existing drainage, neighbouring services and site welfare

Drawing 000-BPC-WD-ZZ-D-C-010 P01 identifies removal of the existing septic tank serving DM Chainsaws, replacement of its soakaway and alterations to chambers and pipework. However, the written CEMP does not specifically explain the method and sequence for these operations, continuity of services remaining in use, or the controls for decommissioning the existing infrastructure.

The drawing already requires confirmation of existing pipe depths, positions and sizes and reinstatement of severed land drains. Please explain how investigation, commissioning and changeover will be coordinated with the construction programme, including temporary drainage arrangements, tank emptying and removal, waste handling, pollution prevention and protection of existing structures and services.

Please also confirm whether the proposed works have been discussed with DM Chainsaws and how any arrangements necessary to implement works affecting its drainage will be secured before those operations begin.

Section 7.11 states that site toilets will connect to the existing drainage system. Please identify the system relied upon and explain how that connection will remain functional and compatible with the proposed alterations.

Can the case officer please confirm that ALL historical drainage infrastructure on the site has been identified and accounted for in the submitted proposals?

The submitted drainage drawings also propose a new private foul-drain connection from DM Chainsaws, subject to confirmation of its maximum site population, alongside septic-tank removal and soakaway replacement. These proposals are not evident on the earlier PL400 drawing submitted with the reserved-matters application. Please explain whether they constitute further drainage details within the existing permission or require amendments to the approved scheme. That assessment should address additional drainage demand and any consequences for communal space, landscaping, retained trees and maintenance access. If approval through the NMA is relied upon, please identify the amendments concerned and explain why their effects are considered non-material.

7. Lighting, noise, public engagement and implementation

Condition 5(e) requires floodlighting details. CEMP section 2.2 states that the compound will not be lit outside working hours, whereas Ecosupport section 5.9 permits motion-sensor security lighting outside daytime working hours. Please reconcile the operating periods and explain how Site Manager authorisation and ECoW agreement will operate together.

Please provide proportionate details of lighting locations, heights, direction and controls, demonstrating the report's stated maximum of 1 lux at the specified habitat buffers, protection of neighbouring occupiers and verification as works progress.

Ecosupport section 5.10 (page 51) requires monthly ecologist inspections. Table 9 (page 60) instead specifies monthly Site Manager inspections and "bi-annual" ecologist inspections. Section 5.2.3 also specifies quarterly fence inspections. Please provide a clear minimum inspection and reporting schedule identifying responsibilities, sensitive-work attendance, records and corrective action.

Section 7.2 requires the client to appoint the relevant roles before works commence. Please reconcile Table 8's outstanding entries with Doswell's identification as main contractor and confirm how the required appointments will be recorded before activities needing their involvement.

For Condition 5(d), contractor Section 3 provides noise-control measures and states that no piling is proposed. Please identify how the measures will apply to the actual working areas and nearby sensitive occupiers, including the care home, and show any temporary noise barriers relied upon.

For Condition 5(c), the contractor's management arrangements promise milestone letters and contact details for adjacent residential properties. Please identify the advance-notice arrangements for affected occupiers, including DM Chainsaws and the care home, where access formation or drainage changeover could affect their operations or services.

Please also correct the references to “NFDC” and undefined “Phase 2” in the ecological dust-control table and reconcile its instruction to keep vehicle speeds below 10km/h with the CEMP’s 10mph limit.

8. Relevant Arun decisions

Arun’s own decisions provide practical comparisons for the assessment of this submission.

In P/130/24/DOC, refused on 17th February 2025, unresolved inconsistencies, missing site-layout information and concerns about construction activity within tree root protection areas contributed to refusal of the Construction Management Plan. Separate phasing details were also refused because the proposed sequence did not ensure that receiving drainage infrastructure would be available when required.

At Tye Lane, WA/116/18/DOC expressly addressed compound turning and staff-parking arrangements, supported by the April 2019 Construction Management Plan, report 183240-06C, including drawing 183240-009 Rev B on PDF page 26.

These are comparisons under their respective condition wording, rather than binding precedents requiring the same outcome here. These examples reinforce the need to resolve the outstanding layout, parking, tree-protection and drainage-sequencing questions here. Please explain how the submitted documents satisfy each requirement of Appeal Condition 5 and provide coordinated, workable construction arrangements before approving those details.

Requested determination

Please obtain a corrected, coordinated CEMP submission addressing these matters and make it publicly available for review before determination. Where a concern is considered resolved, please identify the document or specialist response that resolves it.

The primary question is whether the submitted details satisfy Condition 5. I am not suggesting that another undischarged condition automatically prevents approval of this one.

On the information available, the missing vehicle assessment, insufficiently demonstrated parking and site logistics, unresolved programme dependencies, inconsistent drawings and contradictory implementation instructions require correction before approval.

Please take account of the relevant national decision-making policies in the NPPF published on 17th August 2026, which Annex A, paragraph 1, makes material considerations from publication.

Policy DM3(1)(b) supports an assessment proportionate to the scale, complexity and potential impacts of the proposals.

Policies P3(1) and P3(2)(b), (d) and (e), and N2(1)(d) and (f), are relevant to the pollution, lighting, habitat and retained-tree safeguards identified above.

Policy P4(1) is also relevant to the proposed alterations to drainage serving DM Chainsaws, requiring effective integration with existing activities and infrastructure without imposing unreasonable restrictions on their operation.

These policies reinforce the need for sufficient, consistent information about the construction arrangements and their dependencies across the NMA and DOC submissions.

The primary question remains whether the details submitted satisfy Condition 5; this representation does not seek to reopen the principle of development.

Any approval should identify precisely the governing layout and documents relied upon, explain how the submitted details satisfy Condition 5, and address the dependencies between the outstanding NMA and DOC applications. This should provide a clear record capable of judicial scrutiny, showing how the omissions and inconsistencies identified in this representation have been resolved.

Any approval should also preserve Condition 5's continuing requirement to implement and adhere to the approved CEMP throughout construction.

Please acknowledge receipt and confirm that these comments will be placed on the WA/98/26/DOC record, with a copy on WA/97/26/DOC for the relevant construction and drainage matters.

Kind regards,

Martin Downes