



Objection



Dear Mr Davis,
It was good to talk earlier today and I am attaching our joint response to the above. If you need an attachment please advise.

Yours sincerely,
Stephanie and Rupert Head

Hobbs Farmhouse

Bilsham Rd

Yapton

West Sussex

BN18 0JY

1st September 2020

Dear Mr Davis,

Re Planning Application Y/70/20/OUT

We appreciate this submission is only at the outline application stage, this planned development would have fundamental implications and permanent impact upon Bilsham. Whilst recognising the need for additional housing in the wider Yapton area, it is considered that this proposal for 81 new dwellings, which are in addition to the already massive Yapton housing development plan, represents an unacceptable concentration of new housing within the small Bilsham area. Bilsham would be permanently changed.

In addition, further expansion of the adjacent industrial site would have a very significant impact on the immediate area.

It must be firmly stated, at outset that the objections are underlined by the poor levels of detail, accuracy and quality of the outline application and supporting documentation.

Comments Relating to the 'Transport and Highway Appraisal'

[Section 12]

The vehicle/traffic movement analysis is based upon an assumption that a third of traffic will enter from Yapton, with the remainder coming in/out via the B2233. There is no evidence to support this assumption and at present the junction to the south of the site experiences serious tail-backs with motorists trying to filter onto the B2233. It is also noted within the submission that the site is to provide amenity space and services such as play areas, a village hall and local retail unit (the retail unit appears to have been withdrawn since the original version) Any traffic associated with the intended access to link this site with the village of Yapton has therefore been excluded from this assessment.

[Section 13]

The traffic analysis appears not to be coordinated with the application material submitted by the agent as this states "the development would replace the existing, small Industrial area the incremental amount of new traffic would be slightly lower". The application seeks to expand upon the existing number of light industrial units and labours the point that this portion of the site is to be developed further to provide additional employment on site. Once again, the current analysis of traffic does not appear to reflect nor include this in its analysis.

[Section 14]

It should be noted that there is currently no pedestrian route between the proposed site and Yapton. It is therefore felt that this statement is inaccurate and that pedestrian access remains limited.

[Section 22]

Transport & Highways Appraisal states clearly that a "pedestrian link would need to be completed as part of this development" as existing access is restricted from the north of the site. It should be noted that the adoption of a pedestrian access route between the site and Hobbs Court would cut across private driveway access to a number of properties, would require the infilling existing irrigation ditches and would also require excavation within the root protection area of mature trees which include those protected under any tree preservation orders. The route also includes a double hair pin bend with highly restricted visual access. The statement "the verge along the east side of Bilsham Road appears to have adequate width to accommodate a new footway" is incorrect. Indeed, pedestrians are forced to walk dangerously close to or on this road which has seen increasingly heavy and faster traffic flow.

Other Comments:

The current application materials do not reflect the comments provided within the Transport & Highways Appraisal

in regards to road widening provision or inclusion of the 'ghost' island. It is also expected that an application of this nature would include, as part of its evidence/research, existing traffic stress testing and/or similar surveys in order to justify and proposal for new access. The current application appears therefore to be based upon 'assumptions' created as part of a desk top survey in 2017 which is insufficient supporting evidence to support the location and perceived impact of a new roadway serving 100+ dwellings and an expanding industrial development.

It should be noted that the submitted Transport & Highways Appraisal is very much out of date having been written almost 3 years ahead of some of the application materials. It is therefore evident that this document does not reflect the current proposal and that a new Transport & Highways Appraisal should be provided which is actually coordinated with this application.

In addition to the above, the application promotes the success of this site being key to that which it forms "an organic extension of Yapton" and "add(s) to the village of Yapton in a sympathetic and generic form". Both statements are incorrect and unfounded which is underlined by the manner in which the new development is physically inaccessible to the neighbouring residents of Yapton together with no proposal or even reference to parking provision to access play spaces and new amenities such as the proposed 'Village Hall'. The development therefore represents a 'satellite' development which is disassociated from the existing community Yapton and lacks sufficient consideration or evidence as to how the masterplan of the site would provide positive connectivity to existing public amenities and services. "Yapton already has on the boundary of the large village green, an excellent village hall, a skate park and playground.

Comments Relating to the 'Proposed New Access Figure 2'

The adopted Highway plan does not appear to include the full site upon which this application is based.

The annotation and hatch specifying the extent of the "Proposed Housing Area" does not align with that of the main application submitted by the agent. This would suggest from the general arrangement and extent of hatching that the existing light industrial units are to be altered in class to 'C3' classification where as other materials submitted under this application propose that the light industrial buildings/site be increased in capacity. It therefore appears that the Transport & Highways Appraisal excludes the presence of industrial/commercial vehicles such as HGVs, arctic lorries, etc from its analysis of vehicle tracking as well as their access to and from existing congestion junction leading onto the B2233.

The New Access Figure 2 diagram does not provide a proposal beyond the junction at which this meets the existing Grevatts Lane West. This diagram should include additional detail in regards to potential widening of access road to serve the proposed increased capacity of the industrial zone (approx. 200% increase in capacity) including coordination of these access roads serving new village Hall, and new dwellings, including safe access to such areas as new village green and play park and public amenity spaces which will need to cross the route serving the increased capacity of industrial/commercial vehicles. The design of the new road also excludes the access this will need to provide to the Bilsham Corner plot which has been proposed to include 18 dwellings.

There appears to be no confirmation that emergency vehicles will be able to fully access all the proposed new road works.

The New Access Figure 2 diagram has not been coordinated with the applicant's proposed site plan in which an additional network of road and a mini roundabout are proposed. It would therefore appear that this diagram provides an independent analysis of providing an alternative access route to Grevatts Lane only. This document

therefore does not take into consideration how industrial/commercial vehicles will affect the stress testing and tracking requirements to navigate safely within high density play areas and residential environment. It is also evident that the provision of secondary access roads to serve the proposed residential plots has not been coordinated or considered as part of this analysis.

The New Access Figure 2 identifies a large strip along the Eastern side of Bilsham Road, south of the new road junction, which has been identified as requiring continual maintenance to ensure the vegetation is retained at a height of less than 300mm to ensure good visual access at the new junction. It should be noted that this will require the removal of hedgerows and a number of trees and goes directly against the advice received from CDC Ecology who have stated clearly that these hedgerows are to be “retained and enhanced” to support the existing population of bats. Further to the above, it is noted that the Proposed Site Plan includes extensive ‘boundary screening’ along the eastern verge which appears to contradict the advice of the Transport & Highways Appraisal which confirms that this zone would need to be maintained at a height of less than 300mm to ensure safe visual access as part of the new access road junction.

Comments Relating to the ‘Application Form’

The Application Form submitted by the Agent (Sarah Roberts) appears to be inaccurate as this states, and which Section 7 confirms, that the proposed development does not seek to divert or extinguish and existing rights of way. The submitted materials propose the closing up of Grevatt’s Lane which includes existing pedestrian access which contradicts this statement.

The submitted Existing & Proposed Site Plans provided by Critchley Architecture and Design appear to be inaccurate in regards to their annotation of scale. Both drawings include 2 no. separate linear scale bars with no reference to the independent scale of each. Both of these however do not align with the stated scale of 1:2500:A3 and therefore no accurate scale bar is provided to represent 1:2500@A3. Based upon a scale of 1@2500@A3 the existing portion of the site labelled as containing ‘4.56 hectares’ would represent a revised figure of 5.1 hectares ie. a variation of circa 12%. It is therefore unclear how these drawings were validated by Arun District Council ahead of the Public consultation period.

The outline of the existing ‘Light Industrial Use’ within the Existing Site Plan is inaccurate and represents a lesser size than that currently occupied by this use. The hatched zone suggests an eastern boundary formed by hedge rows and ‘2.5m’ high embankment determines the eastern edge of the existing Light Industrial zone where in reality this has since been removed and yard expanded to the east. The figure stated as 4000m² within Section 6 of the Application form is therefore inaccurate. It should also be noted that the hatch representing ‘Light Industrial’ use appears to include one of the primary dwellings within the site (Oak Trees), as well as any private amenity space and dedicated access associated with this residential property. It is therefore felt that the boundaries and annotation represented within the site plan does not accurately represent the existing site and should be revised to provide a true reflection of use classes. It is also assumed that the Case Officer has reviewed the permitted use classes that are stated as being present within the site to confirm that these have been assigned historically or applied for through previous application.

The Existing Site Plan does not represent an accurate reflection of the existing condition. It is noted that a number of static homes have been erected which include additional platforms (verandahs) serving as private amenity space/permanent accommodation within the boundary of the site. A number of additional structures serving the

Light Industrial use are also evident. These do not appear to have been included within the Existing Site Plan, nor do these structures appear to have been granted consent by Arun Planning Department. It is assumed therefore that based upon historical site photographs obtained by Arun Planning July 2013 (stated within the Case Officer's email dated 20th August) those structures deemed to be new will be identified and included within a revised 'Existing Site Plan' to ensure accuracy.

By carefully comparing aerial maps from two sources which are in the public domain (Bing and Google) clearly taken at different times it is very evident that the industrial site has over recent time been developed. For example a static home has been sited on the Northern Boundary.

Section 9 'Materials' provides insufficient clarification of materials proposed as part of the application ie. brick render and 'cladding'. The description of 'cladding' determines 'a covering or coating on a structure or material'. Confirmation is therefore required as the material this to be proposed from ie, metal, timber, tile etc. It is also noted that no description of materials or finishes have been provided under any of the other options available with the form ie. hard standing, lighting, roof materials, boundary treatments etc.

Section 10 'Foul Sewage' states that the additional 81 dwellings and facilities serving the new industrial units are to be connected to the existing mains sewer. No details have been provided as to how this capacity can be absorbed by the existing infrastructure serving Bilsham Road. It is therefore assumed that this will be required ahead of determination rather than conditioned.

Section 12 'Trees and Hedges' appears to be incorrectly completed. It is evident from those comments received from CDC Ecology that those existing hedgerows and trees proposed to be removed as part of the application to serve the new residential developments and access road is deemed to provide a negative impact upon the existing rural end Ecological environment. It is therefore queried as to why a Tree Survey has not been requested or provided as part of the supporting planning information.

Section 16 'All Types of Development: Non-Residential Floorspace

This section only includes confirmation Light Industrial Use Class and fails to include any details or reference in regards to the proposed 'Village Hall' which forms part of the proposed application which would likely be categorized under Class F.

The proposed operating hours of the Industrial Estate suggest an increase in operating hours of 7 days a week, (7am-9pm Monday-Fridays, 7am-1pm Saturdays & 10am-4pm Sundays). Further to this, the general arrangement of the proposed site plan suggests that the boundary of new residential properties be sited less than 3.5 meters form the new industrial buildings. It is therefore questioned whether the increase in industrial buildings/facilities in parallel with the introduction of 81 new dwellings in immediate/close proximity to these units be deemed suitable when considering aspects such as air quality, acoustic issues, light pollution and general day-to-day disturbance.

An example of issues relating to Noise Pollution experienced by residents from light industrial units can be cited as close as the Rudford Industrial Estate, Ford. It is noted that the residents to the south of the Industrial Estate experienced unacceptable levels of noise pollution which resulted in occupants not being able to open their windows to ventilate their own properties in the summer months. This later resulted in the upgrading of a number of existing building envelopes and installation of specialist acoustic baffles last year to attempt to reduce the impact

of said noise. These residents in question were positioned more than 50 meters from the Industrial units whereas the current application provided almost no separation between these use classes. It is therefore expected that a full Acoustic assessment be undertaken ahead of determination i.e. not conditioned, to ensure that any impact upon both existing and future residents be clarified. It is therefore unclear how the proposed density and siting of future housing can be clarified until the impact of this item has been fully assessed.

Additional comments relating to specific impact on Hobbs Farmhouse

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We have been aware of noise coming from the current scaffolding yard at 6.30 am on two mornings within the last month.

The current entrance to Hobbs Farmhouse and the properties (Oak Trees and Little Meadow) is shared before it separates into two driveways which are in parallel for a short length before bending towards Hobbs Farmhouse and Oaktrees respectively. We have noted a large range of traffic over the years including cars, taxis, vans, light goods vehicles and heavy goods vehicles. Several times heavy goods vehicles have attempted to enter the driveway to access the current industrial site and caused traffic disruption as the access is not designed to handle heavy goods vehicles. On one occasion one heavy goods vehicle damaged the fencing and post at the entrance to both properties. We would not wish to see an increase in traffic related to the industrial unit using this access point close to a blind bend where pedestrians are³ obliged to walk on the road itself.

You will appreciate that this response throws up a wide range of issues and important questions; we would expect to see them comprehensively addressed.

Mr Rupert and Mrs Stephanie Head

Hobbs Farmhouse

