

Bronte Welham

From: Nicola Spencer on behalf of Planning
Sent: 02 February 2018 11:42
To: Planning Scanning; Planning.Responses
Subject: FW: Objection Letters - Y/91/17/OUT and Y/92/17/OUT
Attachments: Objection Letter Y_92_17_OUT David Watkins 30Jan2018.doc; Objection Letter Y_91_17_OUT David Watkins 30Jan2018.doc

Nicola Spencer | Technical Support Manager, Planning Department, Arun District Council | Location: Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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From: Watkins, Dave (Broad Oak) [REDACTED]
Sent: 31 January 2018 13:02
To: David Easton
Cc: Planning
Subject: Objection Letters - Y/91/17/OUT and Y/92/17/OUT

f.a.o Mr David Easton

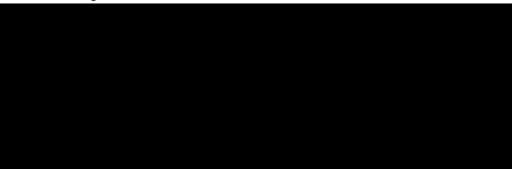
Sir,

I have tried to load my objection letters onto the ADC Planning Site but the system will only permit a total of 3800 words within the comment field. Due to the nature of the development a formal objection cannot be condensed without covering all elements associated with the proposed developments. Therefore I have found the need to produce an OBJECTION letter for both Y/91/17/OUT and Y/92/17/OUT proposed building applications. Can I request that they are registered against the appropriate planning application within the ADC Planning toolset. If this is NOT the appropriate method of registering my objections can you please advise the route by which it can be achieved in a timely manner.

Kind regards

Dave Watkins

Dave Watkins, MInstLM, TAP M.dip, MBILD
Consultant Technologist
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CORALA
BILSHAM ROAD
YAPTON
WEST SUSSEX
BN18 0JB

29th January 2018

OBJECTION LETTER

PLANNING APPLICATION NUMBER: Y/92/17/OUT

LOCATION: Land east of Drove Lane Yapton BN18 0EB

PROPOSAL: Outline application with all matters reserved save access, for up to 300 dwellings, link road, surface drainage, open space and landscaping

Sir/Madam,

I am writing to you to raise my objections against the planning application as listed above.

The Yapton Neighbourhood Plan (YNP) which was adopted and brought into force by the Local Planning Authority (LPA) in November 2014 is part of an overarching document within the overall planning framework. At the time the document set out the housing requirements as was based on the Draft ADC Local Plan of 2003. The Housing requirement was set out in the YNP and based on figures supported by the ADC requirements of 100 houses as was defined in the housing objectives as;

'Provide for a minimum of 100 new dwellings between 2014 and 2029 in accordance with Arun District Councils Draft Plan and ensuring that the overall quantum of development does not put unacceptable strain in infrastructure capacity'.

Since the acceptance of the YNP, Arun District have been working up a revised version of their Local Plan, which is currently going through various stages of review and consultation. The draft Local Plan has recently gone through the 'Hearing Sessions of the Examination in Public of the Arun Local Plan 2011 to 2031 (September 2017)". This latest consultation period will end in the latter part of Feb 2018 and is in response to minor modifications as identified by the examiner.

At a recent appeal decision (APP/C3810/W/17/3170059) the Planning Directorate stated within the appeal document that ***'it is accepted that the emerging Local Plan should be accorded only limited weight given its present stage on the road to adoption'.***

Based on this statement it must therefore be considered that as the Strategic Development associated with this planning application (Y/92/17/OUT) has yet to be adopted as part of Draft ADC Local Plan and therefore, by definition the YNP should be the guiding document. The YNP plan clearly indicates that this development does not align with the house requirements section of this document and should therefore be considered irrelevant at this period in time

Though this is one application for 300 dwellings it is part of an other-arching development for a total of 550 dwellings across the ADCs Strategic Development known as SD7 (Drove Lane/Bilsham Road). The current population (notwithstanding the committed developments) sits at approximately 3500 residents. A development of 550 houses could potential increase this number up by 1700; giving a growth of approximately 50% increase in one single development. The strain this would put on the Village in a single instance would be unattainable and would lead to issues across all elements of family and community life. In the draft ADC Local Plan it indicates that the size of SD7 should be 400+. I am aware it says '+' but another 150 houses (increase of 37%) is excessive in my consideration. Within the Strategic Development section of the Draft ADC Local Plan the figure of 400+ dwellings is quoted for SD7 and appears to have been ignored for this specific development; this is the considered opinion of the examiner according the Appeal document. Even for 400 houses the impact would be severe but for 550 it would be catastrophic on the current Village infrastructure and the community as a whole.

Impact of Development Specifics

➤ *Environment*

The letter from Paul Cann (Senior Engineer – Drainage and Coastal) identified that soakaways/infiltration must be investigated for surface water disposal. Though the developers have conducted investigations into soakage potential (Sept/Oct 2017) they had not incorporated it into the initial surface water drainage design. It therefore requires further work on the winter groundwater monitoring and percolation testing. Depending on outcome then further solutions may need to be implemented. This needs/should be completed before any further consideration should be taken of this development.

The environmental consultation letter states that the development needs to ensure no detriment to any existing watercourses. It is very much evident within the Village that the areas on both Drove Lane and the run-off onto Barnham Road floods regular. Therefore this development will continue to impact and compound this flooding issue. The existence on current infrastructure issues need to be addressed before any suggestion of further developments within the Village should be considered, especially of such large scale projects such as this and Y/91/17/OUT as a combined development. The particular areas of flooding associated with this develop would be the area between Blacksmiths Corner and the 'S' Bend heading towards Barnham after leaving the Village along Barnham Road. This area also contains another proposed development at Staker's Farm, both these developments will exasperate current flooding issues.

➤ *Flood Risk*

Though there are no specific **recorded** flood records associated with the development site, modelling shows that the groundwater flood hazard is Moderate to High Risk. The Lead Local Flood Authority (LLFA) has stated they have not considered the potential for ground water contamination. It does however state that if the Local Planning Authority should consult with the Environmental Agency if this is considered as a risk. The report

from WSCC Flood Risk Consultancy document states that the EA should be consulted, however, within the supporting documentation there is no indication that ADC consulted with EA, there is no the reasoning why this consultation did not take place. The report also indicates that the ADC drainage engineer recommends that the winter groundwater monitoring should be carried out for the entire site to assess how and where infiltration can be incorporated into the surface water drainage designs. There is no indication that the developer responded to this recommendation. If it was conducted where are the results to support any investigation. How do the drainage designs demonstrate that the surface water run-off requirements as requested by the WSCC Flood Risk Management Consultation document. Without this required evidence the developer is unable to prove the site is addressing all flood risks.

➤ **Highways**

The letter from Highways England (Richard Franklin) states that there is insufficient information to enable HE to make an informed decision in relation to the potential impacts of the proposals on the Strategic Road Network (SRN). These include:

- Pre-Application Scoping – At a meeting between developers and WSCC (acting as the Local Highway Authority) it was recommended that HE should be engaged regarding the A27. The developers decided to ignore this recommendation and based on this HE now require the developers cumulative impact on the A27/Yapton Lane junction.
- Baseline Traffic Growth – The developers only presented detail outlined for the 2022 scenario and not for the 2031 scenario and therefore need to submit further detail before consideration.
- Committed development – The figures supplied by the developers do not allow for committed development especially for those directly in relation to this development.
- HE have suggested in their letter that until such time that the evidence is provided to HE then the application should not be determined.

In Planning application Y/91/17/OUT West Sussex Planning Services Consultation response (Stephen Gee) supports a joint transport assessment for the complete development known as SD7 noting that the total dwellings reflect 550 houses rather than the 400+ dwellings identified in the emerging draft Local Plan under Policy SD7. The report specifically identifies that no assessment on the A27 has been provided, at the pre application stage of which the applicant was advised to contact Highways England. The report states that no evidence has been provided that this recommendation was carried out.

A number of objections to this development are listed in the report and consist of:

- a. Insufficient information have been provided to enable an assessment of the ability of the highway network to accommodate the development without adding to the hazards of highway users to an unacceptable degree
- b. The proposal would not achieve safe and convenient access by a choice means of travel nor encourage and enable and increase an environmental sustainable

means of travel such as walking, cycling or public transport and thereby minimise the impact on car journeys.

It should also be pointed out that in the summary produced by Action with Communities in Rural England (ACRE) in July 2013 found that Yapton have a high dependency on the car for travel to work compared to both the National average and that of West Sussex with only 11% of the working population being within 2km of work compared to West Sussex average of 22% and only 4.5% working residents using public transport to travel to the work place compared to a National average of 11%, Chichester has been identified as the main place of work.

Based on these factors that from a Highways perspective this development is inappropriate for the current infrastructure of Yapton and would put increased strain on current design and layout. Though a number of developments have taken place within the boundary of Yapton over the last 7 years, the support of Section 106 towards Community impact has not been evident. The inability for the Authority to direct the funding support from Section 106 has led to the current strain on current resources within the village. Before any further development can be considered it is important that the Councils, Parish, ADC and WSCC realise the compounded impact of constant development within the Parish of Yapton has on the community and their wellbeing. These need to be addressed before **ANY** Strategic Development could even be considered.

➤ **Archaeology**

In the response to the planning application by the County Archaeologist Advisor (James Kenny) it is stated that there has been insufficient archaeology investigations have been completed on this site to support the requirements set out by County. These requirements ensure there has been sufficient investigations conducted in order to identify deposits of interest and to ensure there are appropriate measures for their preservation. No evidence has been provided by the developer that these requirements have been addressed. Yapton has many local historical attributes and it would be irresponsible if these elements of our local history were destroyed in the development of this application. Discussions with the Yapton Historical Group Chairman (Alan Mistlebrook) identified that archaeology digs in the fields near Diamond Mead (near Drove Lane) Bronze Age finds were uncovered. Roman material has also been uncovered during field walks along the side of Drove Lane. Within Bilsham evidence of Roman occupancy has been discovered. It is therefore inconceivable that there are no areas of interest that require preservation. Based on the detail provided, it is essential that the correct level of archaeological investigation is carried out before any form of development is considered in this area.

➤ **Village Growth (*Disproportionate growth through a single development*)**

Though this is one application it is part of an other-arching development for a total of 550 dwellings across the ADCs Strategic Development known as SD7 (Drove Lane/Bilsham Road). The current population (notwithstanding the committee developments) sits at approximately 3500 residents. A development of 550 houses could potential increase this number up by 1700; giving a growth of 50% increase in one single development. The strain this would put on the Village in a single instance would be unattainable and would lead to issues across all elements of family and community life. In the draft ADC Local Plan it indicates that the size of SD7 is around 400+. I am aware it says + but another 150 houses is excessive in my consideration. This figure of 400+ seems to be

being ignored in this development. Even for 400 houses the impact would be severe but for 550 it is catastrophic.

This application disregards the findings of the "2009 Options for Growth" (ADC). Yapton has a fairly limited range of facilities and is not an area of high housing demand. It also offers limited availability for employment provision. The potential increase of dwellings for this development would put a considerable impact on the requirement for additional facilities to be provided in both infrastructure and key services. It would also have an impact on the environment and habitat within the surrounding area. Substantial building work has taken place within Yapton over the last 7 years and no noticeable changes have occurred to the infrastructure and/or key services putting considerable strain on both the Village and surrounding community to meet the increase in development.

➤ **Committed Development**

A number of ad-hoc developments have been brought forward and are either committed or consented to. Each development brings its own impact on the figures and findings associated with this development. Though not a requirement of the developer it is important that the planning committee identify the impact of these additional commitments on the overall infrastructure of the Village.

These areas of impact include but are not limited to:

- Roads
- Health Care
- Shops
- Schools
- Public Transport

In late 2011 at a planning appeal hearing for a significant housing development affecting the village, the planning inspector, in granting this appeal made the following comments: **" I accept the development would place unacceptable pressure on existing infrastructure. Further expenditure at Yapton would be necessary if the development were to be rendered acceptable"**. Though this plan was upheld no infrastructure development came about as a result of this development or any other since then. The aim of the funding generated by the Section 106's are there to support the Village as a result of the additional burden they put on the local community. This does not become evident to existing developments implemented over the last 7 years . Before any other development, be it Strategic Development or not can be considered there is an urgent need to focus on the current state of the infrastructure and focus on supporting the current community as a whole.

➤ **Lack of Community Involvement**

Within the suite of developers documentation to support this application it contains a document titled "Statement of Community Involvement (Dec 2017)". This document identifies that a Public Consultation Event took place on 25th September 2017. The event took the part of an exhibition and did nothing to consult or engage with the community in a sympathetic nature. The exhibition took the form of "what they were going to be doing with the village".

To use the words of a senior member of their presentation group **"You are going to get the Strategic Development if you want it or not and this is your chance to develop it how you want !"**. It was principle based around 3 questions;

- I. Do you have any comments about the masterplan
- II. What community facilities could we provide/enhance as part of our proposals for the benefit of the residence
- III. Do you have any other comments

There was no community involvement, if it was, then these questions would have been answered sympathetically when they 'put together' their masterplan and not being asked after everything had been designed.

Conclusion

This planning application has been submitted as a proposal for the strategic housing site SD7 as defined in the Draft ADC Local Plan, this is misleading as it is a co-joined site with Y/91/17/OUT constituting a total development of 550 dwellings. All considerations for either application should be dealt with as a single application in all aspects of the impact on the Community and its infrastructure and its well-being for the future.

The magnitude of changes that would be needed to be implemented by this unnecessary development to the Village would put significant strain on Yapton and its surrounding communities with regards to services, traffic and the environment; compounded by the lack of modifications, identified and promised by previous developments to the Village by recently (7 years approx.) completed developments.

Based on the objective points listed above I humbly request that you consider the scale of this development (Y/92/17/OUT) and the substantial impact it will have on Yapton and its surrounding communities and reject this planning application along with Y/91/17/OUT in full.

Yours,

Dave Watkins

Dave Watkins

Resident of Yapton