

CM/6/24/DOC

Approval of details reserved by condition imposed under CM/1/17/OUT relating to conditions 6-Phasing Plan and Programme, 8-Arbicultural Method Statement, 9-surface water drainage scheme, 10-discharge of flows to watercourses or the culverting, diversion, infilling or obstruction of any watercourses on site, 11-Flood Management and Mitigation scheme, 12- Ecology Management and Mitigation Plan, 13-archaeological works, 14-Constuction Method Statement, 15- Travel Plan, 16-energy efficiency measures, 17-acoustic barrier, 21- Employment and Skills Plan and 22- provision of broadband. Land to the West of Church Lane and South of Horsemere Green Lane Climping

Clymping Parish Council Objection

Clymping Parish Council has considered carefully and objects to this inadequate application. We agree with the points made by the Ecology Officer that the proposals lack important detail. It is a consistent issue with all the documentation. It is detail that is essential to ensure the plans are enforceable. This is especially important given the difficulties ADC currently appear to have in ensuring meaningful enforcement.

We are also concerned that some conditions are being approved well before the public response date of April 6th.

Our objection covers the following points:

1. The Construction Management Plan fails to address the complexity and timescales of the development. The PC had previously raised the issue of weekend working (i.e. Saturday working) on new properties adjacent to current homes. The plan says nothing about steps to ensure the security of existing property boundaries, landscaping of the boundaries and tree planting on those boundaries that would affect light and shading of existing gardens. The Parish is also concerned that tree planting so close the northern drainage ditch will lead to future drainage obstruction through root growth.
2. The Construction Management Plan says nothing in relation to the sequencing of construction as this relates to the archaeological work and more importantly flood and drainage management during the construction phase. Flood management is a particular concern given the extensive flooding of the site witnessed this winter. We feel that the developer should put the drainage features in place before starting construction work due to the flood risk to adjacent properties.
3. Drainage is a condition of CM/1/17/OUT approved in 2018 (Conditions 9, 10, 11) but to date the Arun drainage engineers have yet to approve the proposals. The plans included in CM/6/24/DOC are included in a larger document which is on file within the CM/48/23/RES documents submitted on 12th July 2023 entitled "Flood Risk Assessment and Drainage Strategy". With regards surface water we note that the proposals are modelled using FEH13 data. This relates to historic rainfall up to

and including 2005. Surely at the very least the current standard FEH22 should be used (FEH22 was released in 2022 by the UK Centre for Ecology and Hydrology and provides an improved baseline for flood risk assessments) with a healthy factor to allow for the fact that in 2023/24 we have witnessed many times “normal” rainfall. The PC was informed by the Environment Agency that rainfall from October 2023 up to and including February 2024 was 180% of the local average, whilst rainfall in February 2024 alone represented 200% of the local average. Given the attention that Arun District Council is now giving to flooding across the coastal flood plain we would expect that more demanding standards are set for new developments.

4. The statement in the document “Flood Risk Assessment and Drainage Strategy” that the site has not witnessed flooding is simply untrue. Residents and the PC have provided ADC with copious evidence of the extensive flooding of the field this winter (see <https://www.youtube.com/watch?v=CnfHWWtAPIQ>) and in 2014. All the evidence from Climate Change studies is that such events will become more likely with increased rainfall combined with high water tables.
5. We note in drawings the areas marked in blue hatch for storage that apparently don’t require landscaping. These areas have been virtually continuously underwater since October 2023.
6. With regards Foul water we note the intention to connect into the existing sewer along Horsemere Green Lane. We need to remind ADC that Southern Water wrote in February 2016 (CM/1/17/OUT document file) with reference to a smaller housing development on the proposed site – *“There is currently inadequate capacity within the foul sewerage network to accommodate a foul flow of 6.5 l/s at manhole reference TQ00020302. The proposed development would increase flows to the public sewerage system, and existing properties and land may be subject to a greater risk of flooding as a result. Additional off-site sewers, or improvements to existing sewers, will be required to provide sufficient capacity to service the development.”* Since this letter was written 24 new properties have been added to the sewer along Horsemere Green Lane with 4 more soon to be completed. The CM/6/24DOC proposals are to add a further a peak flow of 13.89 l/s (CM/6/24/DOC) at the same manhole, twice the flow of concern to Southern Water. Given the recent flooding and sewerage experience across the Arun proper consideration should surely be given to the foul water network to ensure it is not overloaded. ADC and its Flood Forum should be requiring higher standards.
7. A particular concern is the high pressure sewer that crosses the site *en route* from Littlehampton to Ford. The construction Management Plane should be explicit with regards the steps that will be taken to ensure this sewer is not damaged during the construction phase. The PC is acutely aware of the recent failure of the similar Felpham to Ford sewer to the west of Yapton Road.
8. We note the extensive maintenance programme associated with the surface water drainage proposals including regular desilting of the ponds. The cost of this would presumably need to be borne by residents or the development’s eventual management company. No consideration appears to have been made of the cost of this, the consistency with proposals for 30% “affordable housing” (are the annual fees to home owners affordable?) and therefore the sustainability of this “SUDS” system. Given recent experience in Clymping it is not clear who will be responsible for enforcement of the implementation of the drainage plans and the ongoing operation/maintenance of the system.

9. We note the intention to market the proposed community buildings. The Parish have been unable to progress any thinking on the use of these shell buildings given the uncertain fitting out costs for particular uses and the absence of any information on leasing costs. This makes the financial viability of any proposed use uncertain. The Parish Council is concerned the buildings will remain vacant for an extended period attracting vandalism and unsocial behaviour.
10. The new residents will be concerned with noise issues especially from the A259 traffic. We note that the noise surveying was undertaken over a 24 hours period on 3rd and 4th November 2020 just as the country was entering the disruption of the second Covid national lockdown (November 5th 2020). Surely the proposals should be based on a more relevant and recent noise survey and the plans adjusted accordingly.
11. The Travel statement makes an important point about the need for non-motor vehicle, sustainable travel. The route to the north is along Horsemere Green Lane that today provides neither safe nor convenient travel for pedestrians, those of limited mobility or cyclists – it's a rat run without a continuous pavement. We are aware of a section 106 requirement for a contribution to HGL pavements, but this is only released when 50% of the homes are complete. The PC is concerned for the safety and convenience of existing Clymping Residents as well as the first 50% of residents of the new development.
12. There should be an explicit ban on construction traffic HGVs using Horsemere Green Lane.

There is a pressing need for an Advisory Group meeting bringing together the Parish, ADC and the Developer.

Clymping Parish Council urges the Planning Officer to view the drone footage of the site on You Tube at <https://www.youtube.com/watch?v=CnfHWWtAPIQ>