

LAND AT THE WOODGATE CENTRE,
OAK TREE LANE, WOODGATE, PO20 3GU
PLANNING SUPPORTING STATEMENT
PYE HOMES
AUGUST 2021



1.0 Introduction and planning summary

- 1.1 Pye Homes has prepared a full planning application for residential development on the land known as the Woodgate Centre, in Woodgate, the south eastern part of the village of Westergate.
- 1.2 The site forms part of the allocated site, known as SD5 BEW, which is a strategic allocation in the Arun Local Plan for 2,300 new homes, and in this regard accords with the starting point for decision making; the development plan, in terms of the delivery of housing.
- 1.3 The site is in a sustainable location and is suitable for much needed residential development to significantly boost the supply of new homes in the area.
- 1.4 The 7.25 hectare site is allocated in the Development Plan to delivery strategic housing development and is identified in the Framework Master Plan, prepared to support the allocation, for the strategic development area to deliver residential development. As such, and in accordance with the National Planning Policy Framework (NPPF) paragraph 11, the development proposals should be approved without delay.
- 1.5 This Planning Supporting Statement (PSS) demonstrates that the proposed development represents sustainable development, in terms of the development plan and material considerations, including national planning policy, and that for these reasons planning permission should be granted.
- 1.6 The full planning application seeks planning permission for development described as:

“Demolition of the Woodgate Centre buildings (including no.3 residential dwellings) and the construction of 180 residential dwellings, with the creation of new vehicular access with footways and cycleways and ancillary road infrastructure and emergency access arrangements, associated parking, public open space, including children’s play space, landscape planting, surface water attenuation and drainage and other associated infrastructure.”

- 1.7 The planning application is supported by:
 - Design and Access Statement
 - Planning Supporting Statement
 - Land Contamination Assessment
 - Flood Risk Assessment, incorporating Surface and Foul Water Management Strategy
 - Preliminary Services Appraisal
 - Biodiversity Survey and Report
 - Biodiversity Check list
 - Tree survey and Arboricultural report
 - Lighting Report
 - Noise Assessment
 - Air Quality Assessment
 - Transport Assessment

- Travel Plan
- Desk Based Heritage Assessment
- Statement of Community Engagement
- Energy Efficiency and Low Carbon Technologies Appraisal

- 1.8 Pye Homes has undertaken an informal environmental impact assessment (EIA) screening exercise following the NPPG advice on EIA (as set out in appendix 1 to this statement) to examine where the proposed residential development at the Woodgate Centre, Westergate, constitutes an EIA development as defined by the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as amended). This determined that the project was of a type described in schedule 2 of the EIA Regulations, but the site is not in a sensitive area (as defined by the Regulations). As the development's size exceeded the thresholds and criteria for the project type, the requirement for EIA then rested on understanding if the proposed development was likely to have any significant effects. Having examined the indicative thresholds provided in the NPPG and the relevant criteria from schedule 3 of the EIA Regulations, it was concluded that the proposed development is not likely to have significant environmental effects and therefore it is not an EIA development.

Sustainable Location

- 1.9 The site is a sustainable and suitable location for development, being located alongside existing residential development immediately to the south and west of the site where it adjoins the settlement boundary. Although it is situated on the edge of Woodgate and separated from the main heart of the village by the railway line, the site is well connected and contained. The accompanying Transport Assessment (TA) confirms that the site is within easy access on foot and cycle to the amenities and services at Woodgate, Aldingbourne and Westergate. With further footpath connections to Eastergate and the schools and amenities available there.
- 1.10 In addition, the site forms part of the Barnham, Eastergate and Westergate (BEW) strategic allocation in the Arun Local Plan 2011-2031, adopted in 2018. The allocation is for 2,300 new homes in the plan period and is intended to be accompanied by other supporting social infrastructure such as schools, shops, and a community hub. It is focused on the existing villages of Barnham, Eastergate and Westergate. The level of services and facilities provided in these three villages, along with the railway station at Barnham and the new community facilities to be provided by the development will ensure the creation of a sustainable community.
- 1.11 As part of the BEW strategic allocation the site will be well integrated into a range of new pedestrian and cycle connections that will link it to new and existing services and facilities. In addition to the new homes provided, the development includes the provision of a new alignment for the A29 along with other associated transport infrastructure, a community hub, two primary schools, sports pitches, employment provision and a new Linear park alongside the Lidsey Rife.

Housing provision

- 1.12 There is a government imperative to deliver housing. The NPPF setting the government's objective to 'significantly boost' the supply of land for housing.

- 1.13 Arun District Council (ADC) are unable to demonstrate a five-year supply of housing land. In fact, the Council's position falls far short of five years. ADC's latest published position in regard to housing land supply can be found in the Annual Monitoring Report (AMR), dated December 2020. Paragraph 13.4 of the AMR confirms the Council's position that there is a 3.3 year housing land supply for the period 2020 to 2024.
- 1.14 The extent of the shortfall is considered to be below the required position of 5 years and in regard to the NPPF, and is failing to deliver the Government's objective for the planning system to "*significantly boost*" the supply of land for new homes. There is an imperative to approve and deliver new homes on allocated sites in Arun to readdress this position.

Planning Balance

- 1.15 The site is allocated in the Arun Local Plan adopted in 2018 and as such planning permission should be granted without delay in accordance with the Planning and Compulsory Purchase Act 2004 that confirms that "*determination must be made in accordance with the plan unless material considerations indicate otherwise*" (section 38(6)). This statement and the supporting documents demonstrate that there are no material considerations that would indicate otherwise.
- 1.16 The development represents sustainable development, being in a sustainable location and suitable for residential development. The key benefits include the delivery of market and affordable housing in a sustainable location that accords with the Development Plan, which must be given significant weight. The benefit of construction jobs and new homes bonus which can be given moderate weight, as well as the provision of new landscape planting and open space that will form part of the Lidsey Rife Park which can be given significant weight and the delivery of part of the BEW strategic allocation, which must also be given significant weight.
- 1.17 In the context of the adopted development plan allocating the site for development, this planning application should be approved without delay.
- 1.18 Drawing on the technical reports and Design and Access Statement (DAS), it is clear the development will deliver significant benefits. These include:
- Delivery of much needed market and affordable housing.
 - A significant boost to the delivery of housing in Arun.
 - The inclusion of affordable homes for the villages.
 - The provision of additional open space that will deliver part of the Lidsey Rife park.
 - Net biodiversity gain, through ecological enhancements, diversification and habitat creation, improving on the existing low value of the site.
 - Improved water quality discharge into the Lidsey Rife by replacing existing light industrial and equestrian uses with residential development that utilises a Sustainable Urban Drainage system.
 - Support for facilities and local services through an increase in the local population.

- Economic benefits through construction activity and a net increase in expenditure from future residents.
- Facilitate the achievement of the aims and objectives of the BEW masterplan for this site.
- Early delivery of part of the BEW allocation.
- Improvements to cycle and footpath connections from the Woodgate site to Westergate and contributions to improve public transport

1.19 In summary, the development as proposed represents sustainable development that is in accordance with the development plan and planning permission should be granted, given the government imperative to 'significantly boost' the supply of housing, the acute need for affordable housing, the failure to deliver housing and the absence of a five-year supply of land for housing.

2.0 The site and its surroundings

- 2.1 The site lies to the east of the village of Woodgate, to the south of the railway line and to the east of the Lidsey Road (A29).
- 2.2 The site falls from the entrance to the site on the western side to its boundary with the Lidsey Rife.
- 2.3 The site is accessed via Woodgate Road, which provides access to the Woodgate Centre from the A29. The Woodgate centre accommodates a series of small businesses, a house, a horse stables and a series of paddocks.
- 2.4 To the south of the site is the Willows Caravan Park, to the west of the site are a series of residential properties that either back onto the site or have a side facing the site.
- 2.5 The site is in a predominately residential location that is well located in terms of access to a range of local facilities and amenities. These include a primary school, local shops and community centre all within walking and cycling distance of the site.
- 2.6 The nearest bus stop to the site is within 250m, located on the A29 and provides a bus services between Bognor Regis and Yapton. Barnham train station, which provides connections further afield including, Portsmouth Harbour, Brighton and London Victoria is 4km from the site.
- 2.7 Vehicular access to the site is proposed directly from the existing Woodgate Road, that connects to the A29, with emergency vehicles access via Oak Tree Lane.
- 2.8 The site is in reasonable walking distance of a good range of existing local services and facilities, with good access to public transport. In time, with the delivery of the strategic allocation, the site will become integrated into a wider range of services and facilities, with enhanced footpath and cycle connects, particularly enabling better access to Barnham Station.

3 Recent planning history

- 3.1 There is a series of planning applications and appeals related to this site, the most recent dates back to 2013 and is therefore prior to the adoption of the Development Plan and the allocation of the site in the most recent plan.
- 3.2 These applications and appeals are discussed below, however, they should be read in the context of the significant change in planning policy position since these decisions were made.
- 3.3 The first of the two most recent applications proposed the erection of 100 dwellings along with open space and woodland. It was submitted in July 2011 and refused on the 29 September 2011. A subsequent appeal was dismissed on 3 July 2012.
- 3.4 The Local Plan at the time was the Arun District Local Plan adopted in 2003, with a plan period until 2011. The site at the time was located outside of the settlement boundary and within the open countryside. Although Westergate as a settlement was being considered in the emerging spatial strategy for development, this was at an early stage in the process and attracted limited weight in the decision-making process at that time.
- 3.5 On balance, the Inspector concluded that the harm, due to the site's location outside of the settlement boundary, the Woodgate Road junction and the need for pedestrian and cycle route improvements, taken together with the assessed poor level of sustainability of the site were sufficient to override the shortfall in the district's housing land position and the benefits the development would deliver (paragraph 87 and 88, decision reference: APP/C3810/A/11/2163208).
- 3.6 The appeal Inspector did acknowledge that the site is not greatly visible beyond local viewpoints and does not *"itself make a particular contribution to the appearance or character of the surrounding countryside"* (paragraph 3.1.1 decision reference: APP/C3810/A/11/2163208).
- 3.7 Following the above appeal decision, a revised planning application was submitted in September 2012 (ref: AL/106/12), refused in March 2013 and then dismissed at appeal on 30 October 2013. This revised application reduced the number of homes to 85 dwellings, and included a community bus, and more survey information.
- 3.8 The Local Plan at this point in time was advancing, with a site-specific housing allocation within Barnham, Eastergate and Westergate being considered by the Council.
- 3.9 The Inspector concluded that whilst the site may provide a sustainable opportunity to delivery housing development as part of a wider scheme, providing services, facilities and improved transport links; the appeal site in isolation would not present a sustainable opportunity for development. The Inspector stated that *"the appeal site is an unsuitable location for the proposed development with special reference to sustainability in terms of access to facilities"* (paragraph 24, decision reference: APP/C3810/A/13/2196029).

The appeal was dismissed in 2013, and since that time the Arun District Local Plan 2011-2031 has been adopted and allocates this site as part of a wider development. In addition, a framework master plan for the strategic allocation has been considered by Planning Committee on 25 November 2020 with a resolution to endorse the document subject to *“submission of a satisfactory phasing and delivery plan being submitted to officers for consideration”*. Whilst that Phasing and Delivery Plan has yet to be submitted, the majority of the document is finalised and received endorsement from Members.

- 3.10 There has been a significant change in the development plan context since the appeals were refused. The current proposed development addresses the reasons for refusal, providing improvements to the existing A29 and Woodgate Road, securing early delivery of part of the strategic allocation.

4 The proposed development

- 4.1 The planning application is made in full, for 180 new homes, including new access from Woodgate Road, emergency access via Oak Tree Lane, and the provision of new areas of open space that will form part of the Lidsey Rife Park, and will include new children's play space. The application will also include financial contributions towards the infrastructure that will be delivered as part of the BEW strategic allocations, including new schools and a sports centre and community hub.
- 4.2 The application includes safeguarded land to protect the route of the East -West pedestrian and cycle connection to the eastern part of the BEW allocation, on the opposite side of the Lidsey Rife.

Key Benefits

- 4.3 In broad terms it is considered that the development will deliver the following benefits:
- Delivery of much needed market and affordable housing.
 - A significant boost to the delivery of housing in Arun.
 - The inclusion of affordable homes for the villages.
 - The provision of additional open space that will provide part of the Lidsey Rife park.
 - Net biodiversity gain, through ecological enhancements, diversification and habitat creation, improving the existing low value of the site.
 - Improved water quality and reduced discharge rate into the Lidsey Rife by replacing existing light industrial and equestrian uses with residential development that utilises a Sustainable Urban Drainage system.
 - Support for facilities and local services through an increase in the local population.
 - Economic benefits through construction activity and a net increase in expenditure from future residents.
 - Facilitate the achievement of the aims and objectives of the BEW masterplan for this site.
 - Early delivery of part of the BEW allocation.
 - Improvements to cycle and footpath connections from the Woodgate site to Westergate and contributions to improve public transport.
- 4.4 The following sections, with reference to the supporting documents, demonstrate that there are no technical obstacles that would prevent the development of the site for housing.

Housing Development

- 4.5 The layout plan makes provision for up to 180 new homes, of which up to 30% would be affordable in accordance with the policies of Arun District's Local plan

policy AH SP2. Details of the size and mix of the open market homes and of the tenure split of the proposed affordable homes are set out in the table below:

Table 1 Proposed market and affordable housing mix

Dwelling size	Market	Affordable Rented	Affordable Intermediate
1 Bedroom		9	6
2 Bedroom	49	19	3
3 Bedroom	54	10	3
4 Bedroom	24	2	1
Total	127	40	13

- 4.6 The precise location of the affordable homes is set out on proposed site layout, drawing: PL-02. The location of the affordable homes has been carefully considered so it is not clustered in one area of the site.
- 4.7 The new homes will meet Nationally Described Space Standards and include 49 dwellings that meet accessible and adaptable dwelling standards (M4(2)) and 4 dwellings that meet Wheelchair User's needs (M4(3)). This equates to 53 part M4 dwellings, which is 30% of the scheme.

Public open space

- 4.8 The layout of the site makes provision for 2.46 hectares of public open space within the proposed development. This is provided as a sequence of green spaces through the scheme, linking to the main component of open space, provided to form part of the Lidsey Rife Linear Park. Within the Linear Park, an area is set aside for a children's play space. The design intent for this area is to create a natural play area within the park, as described in greater detail in the Design and Access Statement.
- 4.9 The public open space includes a section of the site that will form part of the Lidsey Rife Park. Routes through this part of the public open space have been provided to enable a north – south connection to be made to the areas of the Lidsey Rife Park that fall outside of the planning application site boundary.
- 4.10 The proposed development will also facilitate an east -west link across the Lidsey Rife. The landscape master plan (drawing: LAS 103 05D) includes safeguarded land that will enable this link to be delivered at the appropriate point in time when there is footpath and cycle routes to connect to on the eastern side of the Lidsey Rife.

Trees

- 4.11 An Arboricultural Impact Assessment (AIA) accompanies the application.
- 4.12 Development proposals have been positively designed in relation to tree constraints. Proposals will retain the vast majority of survey items, including all high and moderate quality trees. Proposals recognise the value and importance of all existing large oak trees at the site that are subject to a TPO and retain all of them. All TPO trees have been designed into open space to ensure that they can be retained and contribute to the finished development. Development is directed away from retained trees to ensure RPAs are respected and in many cases lead to an improvement in the rooting environment of several oak trees through reductions in built form.

- 4.13 Proposals will result in the loss of some survey items, however these are all assessed as Category C (Low Quality) therefore should not be viewed as a constraint to development. Items to be removed are largely smaller tree and shrub species that relate to the existing-built form at the site. All items to be removed can be replaced by new planting.
- 4.14 Overall, from a tree retention/loss perspective proposals retain the majority of trees including all high and moderate quality items. Proposals are supported by a detailed landscape proposals plan which includes new tree, hedge and shrub planting. The new planting will lead to a net increase in tree numbers and species diversity at the site compared to the existing situation. Proposals will therefore result in positive enhancements for ecology, arboriculture and the amenity value of the site.

Habitats and Hedgerows

- 4.15 Construction of the proposed development will result in the loss of a small section of hedgerow (approximately 100m), as well as area of scrub, ruderal vegetation improved grassland (4.5 ha) and a small number of scattered trees (all the high value existing oak trees will be retained).
- 4.16 The existing defunct hedgerow along the northern boundary will be reinforced with indigenous hedgerow species such as holly, hawthorn, hazel and field maple. This will form part of a two-metre wide buffer planting zone along the northern boundary which will enhance the site's habitat connectivity with the wider area and provide habitat for a range of protected species. There will also be isolated sections of hedgerow throughout the site, bounding the spine road, private driveways and residential gardens. In addition, the southern site boundary, currently not bordered by vegetation will be planted with the same native species hedgerow. This will result in a net increase of approximately 400 metres in linear habitat features on the site as well as resulting in an improvement in the quality of the habitat. These measures will increase connectivity while maintaining permeability for protected species across the site.
- 4.17 As a result of the proposed planting and landscape treatment, the proposed development will result in a biodiversity net gain of 7.77% for habitat areas and a 416.5% net gain for hedgerows.
- 4.18 Further details can be found in the Design and Access Statement and the Ecological Impact Assessment submitted with the application.

Landscape Strategy

- 4.19 The site provides an appropriate opportunity to deliver development and will integrate well into the landscape setting. The landscape strategy seeks to provide a key connection and part of the Lidsey Rife linear park and where possible retain existing landscape features, such as protected trees.
- 4.20 The site and the surrounding area are not covered by any landscape designations.
- 4.21 Whilst some local views into the site will change, the retention of the existing boundary hedgerows and the proposed open space areas will minimise the extent of any changes.

Surface water attenuation

- 4.22 The majority of the site is within flood zone 1, as demonstrated by flood modelling data provided by the Environment Agency and included in the Flood Risk and Surface Water Drainage Strategy accompanying the application. The site is at low risk of surface water flooding. However, the far eastern edge of the site immediately adjacent to the Lidsey Rife is within floods zones 2 and 3. No residential dwellings are proposed within this zone.
- 4.23 The proposed development facilitates the future construction, subject to planning, of a pedestrian and cycle bridge across the Lidsey Rife. The bridge is development in the flood plain, however, additionally flood compensation will be provided, and land safeguarded in the proposed development to ensure this can be mitigated in the future.

Foul water strategy

- 4.24 All foul water from the proposed development will be discharged through a connection to the existing public sewerage system. Southern Water has agreed in writing that adequate capacity will be made available to serve the proposed development.

Sustainable Construction

- 4.25 The proposed homes will all be energy and water efficient and constructed to a standard that will meet the Building Regulations requirements for new developments. The Application is accompanied by an Energy Efficiency and Low Carbon Technologies Appraisal which confirms that the site has been designed to maximise access to daylight and natural heating but also enable the use of solar PV technology to generate 10% of the annual energy requirement of the development.

Site Access and parking

- 4.26 The site will be accessed from Woodgate Road, with emergency access only from Oak Tree Lane.
- 4.27 The Transport Assessment that accompanies this application confirms that the site is suitable and accessible location for residential development. The development can be accessed safely by vehicle users and pedestrians / cyclists providing connectivity to the services and facilities available at Westergate.
- 4.28 Car parking and cycle parking including provision for electric vehicle charging is provided to meet the standards set out in ADC's Parking Standards Supplementary Planning Document (SPD) January 202 and WSCC's Guidance on Parking September 2020.
- 4.29 A Travel Plan covering this residential development has been submitted in support of the planning application.

Heritage

- 4.30 A desk-based Heritage Assessment has been prepared in support of the application at the site. The assessment describes the known terrestrial archaeological resource and the built heritage assets of the site and study area.
- 4.31 The Historic Environment Record (HER), provided by West Sussex County Council, showed no non-designated sites or features and no designated heritage assets (listed buildings) within, or adjacent to any element of the proposed development.
- 4.32 The closest designated heritage assets to the site is the group at Westergate, comprised of the locally designated Old Farm and The Old Manor House farmsteads. Further from the site there is a cluster of listed buildings at Eastergate, which form part of Church Lane conservation area that form a distinctive group of buildings focused around the parish church of St. George (grade II*). These assets currently have no direct historic, physical or visual relationship to the site. The application site does not form part of the setting of the listed buildings and there is no potential for effects as a result of the proposed development.
- 4.33 The geophysical survey conducted on the site has not recorded any magnetic responses that could be interpreted as being of archaeological interest. In line with best practice, consultation with the archaeological advisor to the local planning authority concluded that based on the combined HER and geophysical survey results, further site-specific archaeological evaluation work prior to determination was not required, and any further site investigation could be secured via a standard planning condition.
- 4.34 The Heritage Assessment concludes that there is an overall low potential for archaeological sites of importance to be present across the proposed development area.

Ecology

- 4.35 The site is not covered by any local, national or international ecological designations.
- 4.36 An Extended Phase 1 habitat survey has been undertaken, along with a number of Phase 2 protected species surveys and these are detailed in the Ecology Report.
- 4.37 At the closest point the site is 11.9km from the Singleton and Cocking Tunnels SAC, which lies in the South Downs National Park.
- 4.38 Policy SD10: International Sites of the South Downs National Park Local Plan set out specific requirements in relation to internationally designated nature conservation sites, including the Singleton and Cocking Tunnels SAC. The policy advises that within 12km of these sites proposed development would need to incorporate necessary surveys and ensure that key features (for foraging habitat and commuting routes) are retained. Within 12km of the site, significant impacts or severance to flight lines is to be considered.
- 4.39 At the very closest point the site is only just within 12km of the Singleton and Cocking Tunnels SAC. The Ecology report confirms that very low numbers of

Bechstein's and Barbastelle bats (bats protected by these sites) were recorded during the surveys (only 0.1% and 0.65%) and the site does not provide the optimum habitat for this species with only the species-poor defunct hedgerows present on site that is likely to be of interest to the bats for feeding. As such, it is unlikely that the proposed development will have a significant adverse impact on the integrity of the SAC.

6 Planning Policy Analysis and key material planning considerations

Delivering a sustainable development: The National Planning Policy Framework

- 6.1 The NPPF identifies that there are three dimensions to sustainable development, economic, social and environmental (paragraph 7). It is recognised that these roles should not be undertaken in isolation because they are mutually dependent (paragraph 8).
- 6.2 The key matters in respect to national planning policy relate to the presumption in favour of sustainable development, housing delivery and highways impact.
- 6.3 NPPF paragraph 11 establishes that a presumption in favour of sustainable development applies, and for decision-taking this means:

“c) approving development proposals that accord with the development plan without delay; or

d) Where there is no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in the Framework that prevent areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”

- 6.4 The Woodgate Centre site forms part of the BEW strategic allocation in the ADLP and therefore would fall within category c) and should be approved without delay. If there is conflict identified with the development plan in regard to the proposed development, this should be considered in the context of the NPPF and ADC five year housing land supply position.
- 6.5 Footnote 8 confirms that policies should be considered out-of-date where an authority cannot demonstrate a five year housing land supply or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the last three years. ADC is unable to demonstrate a five year supply of housing land and therefore the development plan policies are considered out of date. This should not prevent allocated sites being brought forward, in fact in this context there is a greater imperative to bring forward allocated sites to address the significant need for new homes in the District.
- 6.6 The NPPF, chapter 5 goes on to support the delivery of housing, setting the Government’s objective of *“significantly boosting the supply of homes”* (paragraph 60).
- 6.7 In respect of highways matters, the NPPF, paragraph 111 establishes the key policy test, stipulating that development should only be prevented or refused on highway

grounds if the proposal would lead to an unacceptable highway safety impact, or the residual cumulative impacts on the road network would be severe. The accompanying TA confirms that the proposed development would not have an unacceptable impact on highway safety or leave to severe impact on the highway network.

The development plan

6.8 The development plan relevant to the application site comprises:

- The Arun Local Plan 2011-2031 (adopted July 2018)
- Aldingbourne Neighbourhood Development Plan
- West Sussex Joint Minerals Local Plan (adopted 2018)
- West Sussex Waste Local Plan (adopted 2014)

6.9 The extent to which the proposed development complies with the relevant documents and policies contained in the development plan is set out below.

The Arun Local Plan 2011-2031

The Strategy for growth

6.10 The Arun Local Plan was adopted in July 2018 and sets out the spatial strategy for Arun over the period 2011-2031.

6.11 The Local Plan highlights the role Barnham, Eastergate and Westergate play, as well-connected large villages serving inland parts of the district.

6.12 Strategic Policy, SD SP1a sets out the spatial strategy for Arun in the period up until 2031. It seeks to provide growth in villages that is sustainable and maintains the open countryside around them. Within the plan period SD SP1a sets out the need for the district to deliver 20,000 homes. To accommodate the 20,000 homes during the plan period, policy H SP1 allocates strategic sites to deliver this housing. Site SD 5 is Barnham/Eastergate/Westergate is targeted with delivering 2,300 homes during the plan period.

6.13 Policy H SP2 Strategic Site Allocations, requires the strategic allocations to be “*comprehensively planned*” with a master plan that is endorsed by the Council. The policy includes a series of requirements to ensure the proposals are comprehensively planned to ensure integration, connectivity, harmonious relationships between town and country, protection of the natural environment, incorporation of high-quality green spaces, accessibility and provision of appropriate infrastructure, to name a few.

6.14 The masterplan for Barnham, Eastergate and Westergate (BEW) was endorsed by the Council (referred to as the Framework Masterplan), subject to the receipt of a satisfactory Phasing and Delivery Plan, on the 25 November 2020. The principles set out in the Framework Masterplan have been followed in the design development of the proposals for this site. The Framework Masterplan establishes the principles for the Woodgate Centre site, as part of the proposed development referred to urban extension to deliver residential development along with part of

the Lidsey Rife Linear Park. The Framework Masterplan is considered in more detail in the design and access statement.

- 6.15 It is noted that the Framework Masterplan includes a secondary link through the site, crossing the Lidsey Rife. This is not a requirement set out in policy in the adopted local plan. Transport Assessment work has confirmed that the proposed development can be safely served by a single site access through Woodgate Road off the A29 Lidsey Road. Supplemented with an emergency access, cycle and footway via Oak Tree Lane. Furthermore, the sensitivity test undertaken demonstrated that having a secondary link through the site, crossing the Lidsey Rife, would result in increased traffic, once the A29 re-alignment was in place, from the south at Woodgate Level crossing without any material benefit in operation of the highway network. As such, the application does not provide a vehicle connection across the Lidsey Rife at this point but safeguards land and will provide a contribution towards an east-west pedestrian and cycle link.
- 6.16 Strategic Allocations Policy H SP2 requires strategic allocations to “*consider inclusion of an area of the sites for Self-Build and Custom Build and consider the delivery of an area as a site for Gypsy and Traveller accommodation*”.
- 6.17 The Framework Masterplan was prepared by others. It does not include a requirement for Self-Build and Custom Build or Gypsy and Traveller accommodation on the Woodgate Centre site. Development of the Framework masterplan would have been the opportune moment to consider these uses.
- 6.18 The Woodgate Centre site is a relatively small component of the BEW allocation, delivering 180 of the allocated 2,300 homes. ‘*Consideration*’ has been given to the inclusion of self and custom build homes and provision of Gypsy and traveller pitches but given the size and location of the site neither can be provided within the proposed development without causing difficulty in construction or delay in delivery. During preapplication discussions no specific local need has been identified by Arun District Council.
- 6.19 As a site on the edge of the existing settlement the design and character of the proposed development is key and would not lend itself to either self or custom build or provision of gypsy and traveller pitches. Self and Custom build dwellings would be particularly difficult to accommodate on the site as the application is submitted in full with all details provided leaving self or custom builders with limited options in terms of design of their properties. Self and custom build are likely to take many years to sell and therefore the location on the site, to ensure they do not obstruct the delivery of housing, is likely to be toward the eastern end where new homes will be more prominent in views from the Lidsey Rife Park. The design of the parkland setting is key and therefore it is important that there is control in terms of the design.
- 6.20 The site size and orientation does not lend itself to having pockets taken out for self and custom build or gypsy and traveller pitches. What is more, market advice has indicated that there would not be demand from Self and Custom Builders to own a plot on a housing development site, most look for larger plots away from large development areas to create their bespoke home.
- 6.21 Gypsy and Traveller accommodation would be better suited to a site with direct access to the A29 or the re-aligned route of the A29. The access to the

Woodgate Centre site is through existing residential streets and it is our understanding that this location would not lend itself to Gypsy and Traveller requirements.

- 6.22 What is more, Pye Homes are keen to ensure the early delivery of these homes and the inclusion of self and custom build and gypsy and traveller pitches could hold up the delivery of certain elements of the site.
- 6.23 The policy requirement is to consider provision, Pye Homes has considered the provision and determined that it would not be suitable in this location and on this site, therefore the policy requirement has been met.
- 6.24 Policy H SP2c is the site-specific policy for the BEW strategic allocation. It sets the requirement to deliver at least 2,300 new homes in the plan period, with a further 700 beyond 2031. The policy sets out 11 requirements for the development to deliver to ensure the new homes are delivered with sufficient infrastructure and ensure the design quality of the proposals.
- 6.25 These 11 criteria have been taken into consideration in the development of the master plan and in the design and development of this proposal. In summary this development achieves and upholds the aims by:
- Ensuring the separate identity of Westergate is maintained as the site will not result in any further physical coalescence between the three villages, by providing a section of the Lidsey Rife Park.
 - Ensuring that the design and layout of the development respects the landscape setting of Westergate, maintaining, where possible key existing landscape features, as described in the Design and Access Statement, significant mature trees have been retained in the development.
 - Taking into account the location of the railway to the north of the site, providing a section of the Lidsey Rife Linear Park and pedestrian and cycle links to connect to future parts of the Park.
 - Provides a comprehensive surface water management strategy as set out in the Flood Risk Assessment.
 - Will not affect any view to and from the South Downs National Park, due to the site's location at one of the furthest points from the National Park in the allocation.
 - Will contribute in a proportional way to the provision of a community hub.
 - Will contribute in a proportional way to the transport requirements for the allocation, delivering, in part, the connection from the A29 Lidsey Road towards the new proposed route of the A29 and facilitating the east – west pedestrian and cycle link to the eastern part of the allocation.
 - Provide proportional contributions to new school and nursery places required.

- Provide a proportional contribution to new sports pitches and changing facilities; and
- Will not impact on the incorporation of planned new employment provision.

Housing

- 6.26 Policy H DM1 requires development proposals to provide a balanced mix of housing sizes across market and affordable housing range based on the most up to date guidance in the Strategic Housing Market Assessment.
- 6.27 The Council's most recent assessment of housing need is found in the Updated Housing Needs Evidence 2016, it is acknowledged that this information is dated.
- 6.28 The market housing mix proposed reflects market advice Pye Homes has received, a justifiable departure given the dated evidence provided in the Strategic Housing Market Assessment. The market advice is that there is no demand for 1 bedroom properties and limited demand for two bedroom flats in this area and therefore the mix reflects this advice accordingly.
- 6.29 Across the site 1-bedroom properties are provided as part of the affordable housing requirement.
- 6.30 At this point, and without prejudicing Pye Home's position in regard to the consideration of the viability of the scheme, once all infrastructure contributions are known, provision is made for 30% of the dwellings to be affordable homes in accordance with Local Plan policy AH SP2. The proposed tenure mix is 75% rent and 25% intermediate in accordance with the policy requirement. The affordable housing units are provided in small clusters throughout the scheme. The mix of units reflects pre-application discussion with the Interim Housing Strategy and Enabling Manager. It is noted the Officer confirmed that the highest need was for 2 bedroom properties and therefore the affordable housing provision has sought to respond to this need.

Design

- 6.31 The proposed layout has sought to make the most effective and efficient use of the site. A key principle in the design development was also the creation of a high quality, attractive development with a sense of place, considering the amenities of neighbouring residents, in accordance with the aims and objectives of D SP1 Design, D DM1 Aspects of Form and Design Quality and QE SP1 Quality of the Environment. The submitted Design and Access Statement describes the approach to the design and layout of the development and how these policy objectives have underpinned the evolution of the proposed developments layout and design.
- 6.32 The new homes proposed provide appropriate internal space and meet nationally described space standards as set out in the Design and Access Statement.
- 6.33 Arun District Design Guide was adopted as Supplementary Planning Guidance by ADC in 2021. The principles set out in the Design Guide have been followed in the

design development of the proposed development as described in the Design and Access Statement.

6.34 Policy ECC SP1 recognises the need to adapt to climate change and the role new developments have in that process. The proposed development seeks to achieve this by adapting a series of measures in accordance with policy ECC SP1. For instance:

- The proposed new dwellings are located outside of the flood plain.
- The new dwellings will seek to achieve current water efficiency standards.
- The design and layout has carefully considered shading, cooling, ventilation and solar gain.
- The development will provide part of the Lidsey Rife park and create connections to future areas of the Park.
- The layout and massing of the proposed development carefully responds to the orientation of the site and path of the sun to maximise solar gain and enable the use of Solar PV technology.
- Building materials will be selected, where possible, for their resilience.
- The drainage proposals and Sustainable Drainage System makes an allowance for climate change.

6.35 In addition, the proposed development is supported by an Energy Statement that sets out how the proposals will ensure a 10% reduction in the total predicted energy requirement from the scheme with Solar PV Technology.

6.36 The site is part of the BEW framework masterplan. On an individual site basis, but also as part of a wider strategic development, the site aims to improve health and wellbeing in accordance with policy HWB SP1. The proposed development will deliver on site accessible public open space that will form part of the Lidsey Rife Park. As part of the wider strategic development, it will connect into walking and cycling routes and provide proportional contributions to the delivery new sports and recreation facilities.

6.37 The importance of providing well integrated and accessible public open space underpinned the evolution of the site layout. In accordance with policy OSR DM1 and the Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD 2020, the proposed development will deliver 2.46 ha of public open space, and 0.188 ha of play space. The design intent is that the play space created is a natural play space set within the Lidsey Rife Park.

Transport and accessibility

6.38 As confirmed by the Transport Assessment, the proposals incorporate the required transport infrastructure and a package of measure to facilitate the development and ensure there are no severe adverse impacts of the development on the safety and operation of the strategic road network as required by policy T

SP1. In addition, the application is accompanied by an effective and deliverable travel plan prepared to encourage pedestrian and cycle movements.

- 6.39 In accordance with policy T SP1, the proposed development is designed to enable and facilitate access to the existing as well as the new network of green infrastructure being delivered as part of the wider framework master plan.
- 6.40 On-site parking requirements reflect the guidance set out in West Sussex County Councils guidance on parking provision and Arun District Council's Parking Standards Supplementary Planning Document, 2020. The proposal incorporates facilities for charging electric and plug-in hybrid cars as demonstrated. As well as facilities to support and make provision for cycling, with cycle parking provided for each dwelling, either in dedicated cycle stores (for the flat blocks) or in back garden cycle store shed in support of policy T DM1.
- 6.41 Access to sustainable modes of public transport and public rights of way is key, and the proposed development seeks to establish links to bus routes to enable sustainable access to wider key destinations in accordance with T DM1.
- 6.42 As part of the delivery of the wider framework master plan for the strategic allocation, this site will contribute to the provision of a joined-up network of cycle routes and public rights of way in accordance with T DM1. Once the BEW development is complete these routes will provide convenient links to new facilities provided as part of that development as well as existing facilities such as Burnham Station.

Infrastructure

- 6.43 Policy W DM1 seeks to secure sufficient water supplies for new development and ensure that the water supply is not detrimental to existing abstractions, river flows, water quality, fisheries, amenity of nature conservation. It also requires new proposed development to demonstrate that it is water efficient and includes measures to meet the desired standard of 110 litres per person per day.
- 6.44 In accordance with W DM1, the foul water drainage report demonstrates there is adequate capacity will be provided within the foul drainage network for the proposed development. The planning application includes details in relation to water supply any necessary upgrade works will be secure through financial contributions.
- 6.45 The application is accompanied by a Flood Risk and Surface Water Drainage Strategy. That document demonstrates accordance with policy W DM3, the integration of Sustainable Urban Drainage into the design and layout of the proposed housing and open space, including permeable driveways and parking, soakaways.
- 6.46 Policy WW DM1 waste management requires development to demonstrate the volume of material to be excavated and the opportunities for re-use and recovery of the excavated material on site to minimise offsite disposal. It is proposed, that if the District Council are minded to approve the development, a condition is incorporated into the decision to cover this element of the development.

Natural Heritage

- 6.47 The accompanying Ecological Assessment explains how the proposed development can deliver a net gain in terms of the biodiversity of the site. In addition, it confirms that, provided recommended mitigation measures are implemented, the proposals will not adversely impact upon designated sites, sites of nature conservation value or protected and priority species and their habitats, breeding areas or foraging areas. As such the proposed development accords with the principles and objectives of ENV SP1 and ENV DM3 that seeks to prompt the preservation, restoration and enhancement of biodiversity and the natural environment.
- 6.48 The planning application is also accompanied by an air quality report, as required by QE DM3. The air quality report concludes that the site is a suitable site for residential use and the proposed development is unlikely to have a significant impact on air quality. But in accordance with guidance, mitigation will be incorporated into the scheme to ensure any air quality impacts are minimised.
- 6.49 With reference to the policies in the local plan, there is compliance with the development plan and the planning application should be approved without delay under the normal planning balance.

Aldingbourne Neighbourhood Development Plan

- 6.50 The Aldingbourne Neighbourhood Development Plan was made on the 9 November 2016. The plan covers the parish of Aldingbourne and includes the village of Westergate, but also settlements of Aldingbourne, Norton, Nyton, Woodgate and Lidsey.
- 6.51 The plan was made in advance of the Arun Local Plan adopted in 2018. At the time the plan was made the allocation of the Strategic development site at Barnham / Eastergate and Westergate was not confirmed. The plan acknowledges it would need to reflect any confirmation of the strategic allocation in a review of the Aldingbourne Neighbourhood Development Plan. Whilst the local plan has subsequently been adopted with the inclusion of the strategic allocation, the Neighbourhood Development Plan (NDP) has not been renewed.
- 6.52 The NDP seeks to ensure new housing developments are of high-quality design that reflects the local character and distinctiveness. As described in the Design and Access Statement the proposed development has sort to reflect local character by through the use of local materials in accordance with policy H1.
- 6.53 Policy H2 requires a mix of housing in terms of the house types, sizes and tenures. It also requires at least 25% of the homes to meet Lifetime Home Standards. The proposed development delivers new homes that reflect the latest requirements for dwelling size and mix. Whilst it is not assessed against the Lifetime Home Standard all the new homes will meet Building Regulations M4(1) which effective is the Lifetime Homes Standard.
- 6.54 In accordance with policy H3, the density of the housing is appropriate to the location of the site, its setting size and the sites relationship to other existing residents.
- 6.55 The NDP seeks to achieve 40% of new homes as affordable homes in the Neighbourhood Plan Area, however, the more up-to-date local plan requires 30%

affordable housing, as such at this stage the proposed development accords with the requirements of the more recently adopted local plan which takes precedent.

- 6.56 The NDP seeks to ensure new homes are accompanied by appropriate and adequate provision of amenity space, either as private gardens or through shared amenity. In accordance with policy H8, all the new propose homes will have access to either private amenity space or shared amenity space.
- 6.57 Policy H9 requires the early consideration in the design process of bin stores and recycling, cycle stores, meter boxes, lighting, flues and ventilation ducts, gutters and pipes, satellite dishes and telephone lines. Through the design development these items have been considered as far as possible at the stage in the project, further detail on their consideration is provided in the Design and Access Statement.
- 6.58 Policy EH1 seeks to protect the built-up area boundary of the settlement. However, this policy is superseded by the adoption of the local plan and allocation of the BEW strategic allocation.
- 6.59 Policy EH2 seeks to ensure that development adjacent to biodiversity corridors does not have a significant harm on the integrity or function of the biodiversity corridor. The ecology report supports the application and confirms that linear habitats on and adjacent to the site that act as biodiversity corridors will be protected and enhanced as part of the proposals. For example, a Construction Environmental Management Plan (CEMP) will be produced and will include measures to protect the Lidsey Rife such as control of surface run-off, prevention of dust and spills and safe storage of materials to ensure that no habitat degradation occurs further downstream. Boundary vegetation will be retained and protected for the duration of the construction phase and will be reinforced post-development with native hedgerow planting. This will result in a net increase of approximately 400 metres in linear habitat features on the site as well as resulting in an improvement in the quality of the habitat. These measures will increase connectivity while maintaining permeability for protected species across the site.
- 6.60 In accordance with policy EH5, the planning application is accompanied by a Flood Risk Assessment. All proposed new homes are outside the areas at risk from flooding, although there is an area of the site that will flood.
- 6.61 The proposed development will retain all the TPO trees on the site within open space areas to contribute to the landscape quality. The proposed development will result in the loss some small trees and shrub planting. These trees are all category C trees (low quality) as set out in the Arboricultural Report that accompanies this application. The benefits of delivering much need new homes outweigh the loss of these trees. In addition, the proposed landscape scheme will deliver a net biodiversity gain and seeks to retain all trees of the protected trees and preserve their amenity value in accordance with policy EH6.
- 6.62 According to map B in the Neighbourhood Plan, the site is not classed as in any of the agricultural land classifications and therefore is not classified as 'best and most versatile' agricultural land and as such development should not be resisted on this ground in accordance with policy EH3.

- 6.63 Policy EH10 seeks to ensure development proposals do not detract from the unlit nature of the Parish. The applicant is willing to accept a condition to supply all the details relating to the lighting of the scheme, as the scheme forms part of the strategic allocation there in a later development plan there has been an acceptance that the unlit nature of the allocation will change, so whilst the development will seek to minimise light pollution the character of the site will change.
- 6.64 Policy GA1 supports development proposals that make or support improvements to walking or cycling routes and they are located in accessible places. The proposed development is in accessible location and will improve existing walking and cycling routes along Woodgate Road to the A29 and, as part of the wide master plan, will support the creation of a series of new cycle and footpath links to benefit both new and existing residents and as such should be supported by policy GA1.
- 6.65 In accordance with policy GA3, parking is provided in accordance with the adopted standards, as explained in further detail in the Design and Access Statement.

8 Heads of terms and affordable housing statement

8.1 As part of a planning application for the proposed development of land at the Woodgate Centre, Pye Homes anticipates agreeing to a Section 106 Agreement with ADC and West Sussex County Council (WSCC) concerning the following matters:

- The percentage, mix tenure, phasing and transfer of affordable housing units
- The phasing management and maintenance arrangements for the delivery of public open space and play space.
- Contributions to off-site sports provision, including sports pitches, sports hub community centre and swimming pools.
- The phasing, arrangement and maintenance arrangements for delivery of the surface water attenuation facilities.
- Contributions towards transport infrastructure, including A29 realignment, Barnham Village improvements, A27/ B2233, A27/A29 and A259 junction improvements, A259 corridor improvements, B2233 pedestrian improvements, improvements to cycle routes and cycle parking at Barnham Train Station, pedestrian connections and contributions to bus improvements.
- Contributions towards education provision, including early years, primary, secondary, sixth form and SEND.
- Contributions towards libraries.
- Contributions towards NHS / Healthcare.
- Any arrangements, as might be necessary and reasonable to contain in a legal agreement for the implementation and monitoring of the travel plan.
- Any arrangements for the transfer of land for open space and play areas to ADC or a management company.
- Agreements in regard to the east – west pedestrian and cycle link

Affordable Housing Statement

8.2 Whilst the ANDP requires provision of 40% affordable housing on development of more than 10 or more dwellings, Policy AH SP2 of the ADLP supersedes this policy, being more recently adopted and sets a requirement of 30% affordable housing with a tenure split of 75% rent and 25% intermediate housing.

8.3 The proposed development will include the demolition of 3 dwellings and therefore presents a net gain of 177 dwellings. It therefore incorporates a policy compliant level of affordable housing provision of 53 dwellings delivered on site with a contribution towards a property off site.

- 8.4 The affordable housing mix is based on the preferred mix suggested by the Interim Housing Strategy and Enabling Manager in pre-application discussions.
- 8.5 The proposed affordable housing incorporates a tenure split of 75 % affordable rent and 25% intermediate homes.
- 8.6 The affordable housing has been distributed throughout the development to ensure the creation of mixed and balanced communities in accordance with the NPPF (paragraph 63).
- 8.7 The proposed development will deliver a policy compliant level of affordable housing that will make a significant contribution to meeting local housing need and should be seen as a significant material benefit of the proposed development.
- 8.8 In accordance with policy AH SP2, Pye Homes, reserves the right to re-visit the affordable housing provision during the Section 106 negotiations, as more detail is known on the infrastructure costs, should the infrastructure costs render the provision of 30% affordable housing not viable.

9 Conclusion

- 9.1 This planning application is submitted by Pye Homes, seeking full planning permission for the redevelopment of the Woodgate centre site. The site is well related to the built form of Woodgate and is a sustainable and suitable location to deliver much needed new homes.
- 9.2 The approval of this planning application will facilitate the delivery of part of the BEW strategic allocation and ensure the delivery of 180 new high quality homes (including affordable homes) and the provision of part of the Lidsey Rife Linear Park.
- 9.3 The site's development of the scale and form proposed would contribute to meeting local housing need in Arun in a sustainable manner.
- 9.4 The site is allocated in the development plan and in accordance with section 3(6) of the Planning and Compulsory Purchase Act 2004, should be approved, particularly in the context of the five year supply position in Arun and the Government's mandate to "*boost significantly*" the supply of housing.
- 9.5 Technical information submitted with this application demonstrates that there are no technical or environmental constraints to the development of this site and demonstrates that the site is in a suitable location to deliver the proposed development. There are clear social, environmental, and economic benefits that would accrue from the proposed development when assessed against the NPPF.
- 9.6 The proposal will broadly provide the following benefits:
- Delivery of much needed market and affordable housing.
 - A significant boost to the delivery of housing in Arun.
 - The inclusion of affordable homes for the villages.
 - The provision of additional open space that will provide part of the Lidsey Rife park.
 - Net biodiversity gain, through ecological enhancements, diversification and habitat creation, improving low value of the site.
 - Improved water quality discharge into the Lidsey Rife by replacing existing light industrial and equestrian uses with residential development that utilises a Sustainable Urban Drainage system.
 - Support for facilities and local services through an increase in the local population.
 - Economic benefits through construction activity and a net increase in expenditure from future residents.
 - Facilitate the achievement of the aims and objectives of the BEW masterplan for this site.
 - Early delivery of part of the BEW allocation.
 - Improvements to cycle and footpath connections from the Woodgate site to Westergate and contributions to improve public transport

- 9.7 In conclusion, the benefits are substantial. The site is allocated in the adopted local plan for residential development for which there is a significant need in Arun. The development represents sustainable development and the planning balance falls clearly in favour of granting planning permission for this proposed development without delay.

Appendix 1: EIA Screening

Appendix 1: EIA screening

1 Introduction

- 1.1 This appendix sets out the EIA screening process undertaken by Pye Homes to determine whether the proposed residential development at the Woodgate Centre, Westergate (see site location plan drawing number: PL 01 revision A) constitutes an environmental impact assessment (EIA) development as defined by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended; hereafter the EIA Regulations).
- 1.2 This screening follows the Ministry of Housing, Communities and Local Government (MHCLG) web-based National Planning Practice Guidance: Environmental Impact Assessment (updated 2020), which provides guidance on the application of EIA in England. The flow chart from the MHCLG's guidance has been used to structure this appendix.
- 1.3 The structure of this appendix is as follows:
- Site description
 - The proposals
 - Application of the screening process to the proposed development
 - Conclusion

2 Site description

- 2.1 The proposed development site is located to the east of the village of Woodgate, north of Bognor Regis, West Sussex (see site location plan, drawing: PL 01 revision A). The site is approximately 7.17 hectares (ha) and is currently occupied by mixed-use units, including three residential properties, collectively known as the Woodgate Centre. There are a number of small business operating these buildings, and a horse stables with a number of paddocks.
- 2.2 The northern and eastern boundaries of the site are bordered by farmland. The railway is approximately 100m to the north of the site, with the closest station being Barnham (4km by road) with service destinations including Portsmouth Harbour, Brighton, Bognor Regis and London Victoria.
- 2.3 To the west of the site is an area of residential housing along Woodgate Road, Woodgate Close and Oak Tree Lane. Properties are primarily single storey bungalows and chalet bungalows (two storeys). To the south of the site is the Willows Caravan Park, which has approximately 180 static caravans.
- 2.4 The site access is from Woodgate Road, which connects directly to the A29, Lidsey Road. The A29 provides access to the wider highway network including the A27 in the north and the A259 to the south.
- 2.5 The topography of the site falls from the west at 9.28m above Ordnance datum (AOD) to 1.1m AOD at the eastern boundary, where the site meets a stream.
- 2.6 The majority of the site lies within flood zone 1 (low risk of flooding), but the eastern quarter of the site is within flood zones 2 and 3.

- 2.7 The site itself is not covered by any environmental or historic designations (figure 2) although a number of trees on the site are covered by tree preservation orders (TPOs). There are no ecological designations in the vicinity of the proposed development site, with the closest being the Brooks local nature reserve (LNR) approximately 2.6km to the south.
- 2.8 There are some listed buildings within the wider area including several in Westergate village centre, the closest being Millards Manor Farmhouse (grade II listed), approximately 800m to the north. There are two small conservation areas in Westergate village, centred on the grade II* listed church and the junction of Nyton Road and Church Lane.
- 2.9 Further afield are grade I listed Barnham Court and the Parish Church of St Mary; both lie approximately 1.6km to the east. The closest scheduled monument is the Keep at Tote Copse Castle approximately 1.7km to the west.
- 2.10 The South Downs National Park covers the land to the north of the A27, approximately 3km to the north of the site at its closest point.
- 2.11 The proposed development site forms part of a strategic allocation, SD5 Barnham/Eastergate/Westergate in the Arun Local Plan 2011-2031 (adopted July 2018). The wider allocation will provide a total of 2,300 new dwellings, appropriate education, community and sports facilities, employment provision and a new A29 route. The local plan process was supported by a Sustainability Appraisal (incorporating a Strategic Environmental Assessment).

3 The proposals

- 3.1 The proposed development is for 180 dwellings, new access from Woodgate Road, emergency access point, open space and play space. Full details on the proposals are set out in section 4 of the Planning Statement.

4 Application of the screening process to the proposed development

Introduction

- 4.1 The EIA Regulations are applied to certain types of development that may have significant effects on the environment. The Regulations categorise various development types as 'schedule 1' or 'schedule 2' development, with the nature of the proposals, their location and scale being the determining factors as to whether they are likely to have significant environmental effects.
- 4.2 All schedule 1 developments and some schedule 2 developments, if they are likely to have significant environmental effects, are termed EIA developments. Screening is the process of determining if a development should be categorised as EIA development. A planning application for EIA development must be accompanied by an environmental statement (ES).
- 4.3 This development proposal is not of a type described under schedule 1. In the case of schedule 2 development, the location must be examined to determine if the site is in a sensitive area as defined in the EIA Regulations. If the development is in a sensitive area and is likely to have significant effects on the environment, then it is EIA development.

- 4.4 If the development site is not within a sensitive area, the next stage is to assess whether the development proposals exceed or meet any of the applicable thresholds and criteria for that particular type / class of development. These thresholds and criteria relate to the attributes of a type of development (e.g. size of the site, production / output, capacity of a facility). Not exceeding or meeting the thresholds is a strong indication that EIA is not required⁽¹⁾. If the development exceeds or meets any of the applicable thresholds and criteria, then it is termed a schedule 2 development.
- 4.5 The next stage is to assess if it is likely to have significant effects on the environment. If it is concluded that significant effects are likely, then the development is EIA development.
- 4.6 EIA screening guidance provided by the European Commission⁽²⁾ is that *“people with the qualifications and experience typically found in competent authorities, and by using information that is readily available about the project and its environment”* can carry out this determination process. Any uncertainty arising from a lack of information should point towards a decision that EIA is required.

Schedule 2

- 4.7 The proposed development is of a type described in section 10(b) of schedule 2: Infrastructure Projects, urban development, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

Sensitive areas

- 4.8 Where a proposed development is of a type described in schedule 2, the next stage is to identify whether the development is located in a ‘sensitive area’. Sensitive areas defined in the EIA Regulations include:
- Sites of special scientific interest
 - National parks
 - The Broads
 - World heritage sites
 - Scheduled monuments
 - Areas of outstanding natural beauty
 - European nature conservation (Natura 2000) sites
- 4.9 None of the designations listed above are applicable to the site or the nearby area. The site is therefore not located in a ‘sensitive area’.

Applicable thresholds and criteria

- 4.10 When a proposed development is of a type described in schedule 2 and not sited in a sensitive area, the applicable thresholds and criteria for that type of

¹ Regulation 5(7) of the EIA Regulations enables the Secretary of State to direct that a development of a type described in schedule 2 is EIA development even if it does not exceed or meet any of the applicable thresholds and criteria. The local authority or a member of the public is able to make a request to the Secretary of State for such a decision.

² Office for official publications of the European Communities, 2017, *Environmental Impact Assessment of Projects: Guidance on Screening*.

development need to be examined. The EIA Regulations define the applicable thresholds and criteria for the proposed type of development (schedule 2, paragraph 10(b) as:

- The development includes more than 1 hectare of urban development which is not dwelling house development; or
- The development includes more than 150 dwellings; or
- The overall area of the development exceeds 5 hectares.

- 4.11 The proposal is for 180 dwellings and the site is 7.17ha in size, so the thresholds for both dwelling numbers and area are exceeded and the proposed development is defined as schedule 2 development. The requirement for EIA now rests on whether the proposed development will have significant environmental effects.

Potential for significant effects

Introduction

- 4.12 Schedule 3 of the EIA Regulations sets out a series of selection criteria to be used in screening schedule 2 developments. These relate to the development's characteristics, the environmental sensitivity of the geographical areas likely to be affected, and the types and characteristics of the potential impacts. The assessment in this section of the potential for the proposed development to lead to significant environmental effects has been informed by these criteria.
- 4.13 In addition, the MHCLG's web-based guidance includes an annex that sets out a series of indicative thresholds relating to the size and scale of the various types of schedule 2 developments that may result in significant effects on the environment, thus requiring EIA. The guidance states that, for section 10(b) developments, the following should be considered:
1. Scale of the development.
 2. Potential increases in traffic, emissions and noise.
 3. EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than previous use, or the types of impact are of a markedly different nature, or there is a high level of contamination (not applicable to this site).
 4. Developments proposed for sites which have not previously been intensively developed are more likely to require EIA if:
 - i. The area of the scheme is more than 5 hectares; or
 - ii. It would provide a total of more than 10,000m² of new commercial floorspace; or
 - iii. The development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)

Scale of development and types of impact

- 4.14 The scale of the proposed development is consistent with the existing residential area immediately to the west of the site (Oak Tree Lane and Woodgate Road) and the wider area of Woodgate to the north west of the site. The site, which has not previously been intensively developed, has an area of 7.25ha (in excess of point 4i), but the proposed development is for 180 dwellings, well below the 1,000-

dwelling threshold in point 4iii. In context, the scheme is will not have a significant urbanising effect on the area.

Traffic

- 4.15 The site will be accessed using the existing vehicular access off Woodgate Road, onto the A29 (Lidsey Road) which links Bognor Regis to the A27 and the emergency access which will be provided through Oak Tree Lane. West Sussex County Council (WSCC) is proposing upgrade works to the A29, which include the delivery of a new bypass to the east of Woodgate and Westergate.
- 4.16 A number of key local services (primary school, sports centre and supermarket) are all within a walking distance of the site (1.2-1.8km). There are existing bus stops on Lidsey Road, the closest being adjacent to the entrance of the Willows Caravan park, with services between Yapton and Bognor Regis operating throughout the day. The closest railway station is approximately 4km (by road) and therefore within cycling distance of the site.
- 4.17 WSCC's A29 Transport Business Case report (prepared by WSP) and the SATURN model supporting the Business Case have been reviewed to identify future peak hour traffic flows and distribution on the A29 when the A29 bypass is complete. The report estimates that the A29 between Lidsey Bends (south of the site) and Hook Lane (just to the north of the level crossing) will experience approximately 476 two-way vehicles in the AM peak and 404 two-way vehicle movements in the PM peak in 2038. This is significantly less traffic than is currently experienced on the A29.
- 4.18 Using the trip rates in the WSCC Traffic Forecasting Report, it is anticipated that the proposed development may generate around 80 two-way trips in the AM peak hour and 85 two-way trips in the PM peak hour. The 2038 traffic flows on the A29 in the immediate vicinity of the development site have been extracted from WSCC's SATURN model. The extracted traffic flows in the AM and PM peak hours without and with the development and percentage increase are set out in table 1 below. Also included are the traffic flows for the A29 at Westergate Street, which due to the presence of Aldingbourne Primary School is considered to be a more sensitive link.

	2038 AM peak hour			2038 PM peak hour		
	Without development	With development	% increase	Without development	With development	% increase
A29 Westergate Street	483	488	1.0%	344	343	0%
A29 north of Woodgate Road (south of Hook Lane)	476	532	11.8%	400	455	13.8%
A29 south of Woodgate Road (Lidsey Bends)	448	458	2.2%	404	400	0%

Table 1: Proposed development flows and relative potential impact (2038)

- 4.19 The Institute of Environmental Management and Assessment's (1993) *Guidelines for the Environmental Assessment of Road Traffic* states that further assessment is required where traffic flows will increase by more than 30% (or more than 10% in sensitive areas) and indicates that significant environmental effects are not likely to

arise where traffic flows increase by less than 10%. The estimated increase in traffic along the less sensitive section of the A29 as a result of the proposals will be well below the 30% threshold and on the sensitive section area of Westergate Street will be well below the 10% threshold. An environmental assessment of the traffic impact of development is therefore not considered necessary.

- 4.20 No significant environmental effects in terms of traffic are therefore expected, but the planning application is supported by a transport assessment (including a travel plan) to address highways issues, in accordance with national requirements.

Air quality

- 4.21 There are no air quality management areas in Westergate or the surrounding area. Regular air quality monitoring is not carried out in the local area, indicating that this part of the district is considered to have good air quality.
- 4.22 As there is unlikely to be a significant increase in vehicle movements resulting from the proposed development, and given its residential nature, the proposals will not lead to significant post-construction air quality effects.
- 4.23 There is the potential for construction activities to generate temporary dust emissions, but standard and proven construction methodologies are available to minimise these temporary adverse effects and therefore no significant effects are predicted.

Noise

- 4.24 Broadly, a perceptible increase in noise associated with road traffic would require a doubling of traffic flow on a given link. As discussed in the traffic section above, this is not expected to occur as a result of the proposed development. The residential nature of the proposed development means that it is not likely to generate significant operational noise post-construction.
- 4.25 There is the potential for construction activities to generate temporary noise, but standard and proven methodologies are available to minimise adverse effects. No significant noise effects are predicted as a result of the proposed development.

Summary

- 4.26 Having examined all the factors listed in the annex to the MHCLG's web-based guidance, it is considered that the proposals will not have the potential to generate significant environmental effects. However, with regard to schedule 3 of the EIA Regulations, there are some additional relevant environmental issues that will warrant further attention and these are discussed below.

Natural heritage

- 4.27 The site is not covered by any local, national or international ecological designations. The closest designated site is The Brooks local nature reserve approximately 2.6km to the south. Further afield, there are three nationally designated sites within 5km. The closest is Halnaker Chalk Pit site of special scientific interest (SSSI), approximately 4.5km to the north, which has one of the largest populations of nationally rare plant species in Great Britain. Felpham SSSI is approximately 4.7km to the south and Earham Pit SSSI is approximately 5km

to the north. The proposed development is unlikely to result in any effects on these ecologically designated sites.

- 4.28 European designated sites within 12km include Pagham Harbour special protection area (SPA), approximately 7.8km to the south west; Solent Maritime special area of conservation (SAC) and Chichester and Langstone Harbour SPA approximately 9.9km to the west; Duncton to Bignor Escarpment SAC 9.4km to the north and the Singleton and Cocking Tunnels SAC 11.9km to the north west.
- 4.29 In terms of the potential effects on European sites, the distance to Pagham Harbour SPA means that the proposal does not fall within the zones where development-linked recreational effects are deemed likely³. Likewise, the site is outside of the zone of recreational influence for Solent Maritime SAC and Chichester and Langstone SPA.
- 4.30 The application site lies 11.9km from the Singleton and Cocking Tunnels SAC, which is designated for barbastelle and Bechstein's bats. This is just within the 12km wider conservation area identified for this SAC in the South Downs Local Plan. Within the wider conservation area the policy (SD10) requires that significant impacts or severance to flight lines are considered. Given that the application site is at significant distance from the SAC, does not contain optimum habitat for these bats and the on-site surveys recorded only a very low number of these species, it is considered that the proposal will not affect the integrity of the protected site.
- 4.31 Habitats within the Duncton to Bignor Escarpment SAC are sensitive to changes in air-quality. Consideration may need to be given to any changes in traffic movements along the A285 resulting from the proposed development. If relevant, this will be considered through the appropriate assessment process under The Conservation of Habitat and Species Regulations 2017. There will be no hydrological link with the proposed development site and any of the European sites.
- 4.32 A phase 1 habitat survey was undertaken in 2017, with an update in October 2020. Phase 2 protected species surveys were also undertaken for bats, otters, badgers, water vole, reptiles and dormice and are being updated in 2021. The majority of the site is improved grassland, areas of scrub, with buildings and hardstanding/gravel areas, scattered trees, tall ruderal and some hedgerows.
- 4.33 The bat surveys identified a number of the mature trees on the site as having features suitable for supporting roosting bats and some of the on-site buildings were identified as being of moderate and high potential to support for roosting bats. Only a single roosting soprano pipistrelle was found during the surveys. The site was assessed as being of high suitability to support foraging and commuting bats. The bat surveys on the site recorded eight species; noctule, common pipistrelle, soprano pipistrelle, *Myotis* species, serotine, Barbastelle, Nathusius' pipistrelle and long-eared bat. The majority of the activity associated with the common pipistrelle.

³ Arun Local Plan, policy ENV DM2 identifies that residential development within 5km from the SPA will give rise to potential recreational effects requiring financial contributions, with major development outside this zone but close the boundary being considered on a case-by-case basis.

- 4.34 The otter survey did not identify any signs of the species (holts, lie-ups, footprints or spraints) along the watercourse on the eastern boundary, as such the species is considered absent from the site.
- 4.35 Two small holes were recorded in the stream bank, along with a number of small mammal trails within the bankside vegetation. However, the absence of conclusive field signs (latrines or feeding) mean that it is considered unlikely that water vole is present in this part of the stream.
- 4.36 No signs or direct evidence of badger (setts, latrines or evidence of foraging) was recorded during the survey, however the site is considered to offer suitable foraging habitat to badgers in the wider area who may pass through the site.
- 4.37 The boundary hedgerow, dense bramble scrub along the wester site boundary and the dense bankside reed vegetation along the stream, provide suitable habitats for dormice. However, the dormouse survey confirmed the likely absence of the species.
- 4.38 The site also contains habitats suitable for a range of breeding birds, including red listed starling and house sparrow, but is considered to offer limited suitable habitat for overwintering birds.
- 4.39 Suitable habitats for foraging and hibernating reptiles are present on the site, although no reptiles were recorded on any of the seven visits made during the reptile survey. In terms of great crested newts, much of the on-site habitats are considered to be sub-optimal for this species. There are no waterbodies on site, and whilst three drainage ditches and a reservoir were identified within 500m of the site these were considered unlikely to support breeding population. It is considered unlikely that great crested newts are utilising the site.
- 4.40 The proposed development will lead to the loss of grazing land, but its low ecological value and the widespread availability of similar habitats in the vicinity mean that no significant effects are likely on the area's habitats or protected species. The retention of existing trees within the site and the new habitats being created within the open areas of the site as part of the development (including wetland, trees and shrub planting) will ensure that any protected species using the site will not be significantly affected and the ecological resources of the area will be enhanced.
- 4.41 An ecological impact assessment has been submitted with the planning application, which includes the findings of the above surveys. No significant effects are envisaged on natural heritage.

Landscape and visual effects

- 4.42 The site and the surrounding area are not covered by any landscape designations, although the South Downs National Park is approximately 3km to the north. There are no public rights of way on the site or in the adjacent area.
- 4.43 The West Sussex landscape character map identifies the site as being in character area SC9: Chichester to Yapton Coastal Plain. The associated West

Sussex Landscape Land Management Guidelines⁽⁴⁾ for character area SC9 notes the overall characteristics as mainly flat, open landscape, dominated by arable fields and modern farm buildings. Equestrian facilities, horse paddocks and industrial buildings are identified as a strong suburban element, which create visual confusion and poor definition between town and countryside.

- 4.44 The proposal will introduce new development to the site, which is currently partially undeveloped. However, the site is well related to the adjacent residential areas and caravan park to the south and forms a natural extension to the built form in this location.
- 4.45 While some local views into the site, such as those on the northern edge of the Willows Caravan Park and eastern edge of Woodgate, will change, due to the flat topography there are unlikely to be significant changes from the wider area. Any views from elevated areas of the South Down National Park to the north will be long distance and the proposed development will be read in the context of the existing residential areas of Woodgate and Westergate.
- 4.46 Limited glimpsed views of the site may be possible from the railway line (particularly to the east of the site), but these will be transient in nature and the proposals will be seen against the background of the existing residential area of Woodgate.
- 4.47 In addition, the proposed development will include elements of public open space and landscape planting to break up the built form. The design of the proposed development will be considered in detail in the design and access statement that will accompany the planning application.
- 4.48 A landscape and visual impact assessment has been submitted in support of the planning application and no significant landscape and visual effects are predicted.

Cultural heritage

- 4.49 There are no designated heritage assets on the site or in the immediate area. The closest scheduled monument (the keep at Tote Copse Castle) is approximately 1.7km to the west. There are a number listed buildings within Westergate village centre to the north of the site. All are grade II listed (except the Parish Church of St George which is I*) and the closest is Millards Farmhouse, approximately 800m north. There are two small conservation areas in Westergate, one centred on the church, the other around the junction of Nyton Road and Church Lane. The relative distance between the site and the listed buildings and the intervening built development and vegetation mean that no significant effects are expected in relation to built heritage assets.
- 4.50 No archaeological finds have been recorded on the site to date and the previously developed areas of the site are likely to offer very limited potential for buried archaeology. However, areas of the site which have not previously been developed or disturbed may contain buried remains. Excavations undertaken

⁴ As set out in A Strategy for the West Sussex Landscape (November 2005), WSCC.

elsewhere in the local area have identified finds or structures from prehistoric to the early Roman period⁽⁵⁾.

- 4.51 A desk-based archaeological assessment will be undertaken, which will be used to devise an appropriate programme of site investigations, such as geophysical surveys and / or trial trenching, in consultation with WSCC's archaeologist. The findings of these studies will be fed into the master planning process for the site and, if necessary, enable further appropriate mitigation measures to be developed. This will ensure that there will be no significant adverse effects on any archaeological remains as a result of the proposed development.
- 4.52 The site's historic field pattern does not survive, and no significant adverse effects are predicted on the historic landscape as a result of the proposed development.
- 4.53 A desk-based heritage assessment, including the findings of the archaeological work, has been submitted in support of the planning application, and no significant cultural heritage effects are predicted.

Water environment and ground conditions

- 4.54 The nearest watercourse to the site is a stream on the eastern boundary which flows in a southerly direction. The Environment Agency's online flood mapping⁽⁶⁾ shows that the majority of the site is within flood zone 1; however, an area on the eastern side is within flood zones 2 and 3. This area will be retained as open space with no built development or impermeable surfaces.
- 4.55 The groundwater vulnerability mapping⁽⁷⁾ classifies the site as being of medium-low vulnerability. The site is underlain by superficial deposits classified as a secondary A aquifer, with unproductive bedrock geology, and is not located within a source protection zone.
- 4.56 Standard and proven construction methodologies, such as those set out in CIRIA (2001) *C532 Control of water pollution from construction sites. Guidance for consultants and contractors* are available to minimise the potential for adverse effects on water quality during construction.
- 4.57 Infiltration testing undertaken at the site observed shallow groundwater, therefore it is unlikely that traditional soakaways will be a viable option. Sustainable drainage systems with best practice pollution control measures will be used to control runoff rates and prevent water pollution post-construction and no significant effects are predicted on the water environment.
- 4.58 The planning application is accompanied by a flood risk assessment, in accordance with national requirements, as the site is over 1ha and partially in flood zones 2 and 3.
- 4.59 The site is currently a mixture of horse paddocks and small-scale business units, including a vehicle repair shop. A ground conditions report for the site identified potential made ground (including an area of landfill), application of pesticides /

⁵ <https://heritagegateway.org.uk>

⁶ <https://flood-map-for-planning.service.gov.uk>

⁷ <https://magic.deira.gov.uk>

herbicides and potential historic tanks (unconfirmed storage or contents) as potential sources of contamination.

- 4.60 Intrusive ground investigations (including trial pits, infiltration tests and boreholes) were undertaken in 2019; however, due to access restrictions relating to some existing uses at the site the geographical extent of the survey was limited. In areas surveyed, all soil pollutant concentrations in the made ground, topsoil and natural soils were below the adopted screening levels for residential use or not considered to present an unacceptable risk to human health.
- 4.61 Construction workers will utilise best practice construction techniques, including the use of PPE, to ensure that there is no significant risk to human health or controlled waters during construction.
- 4.62 Whilst historic activities at the site could result in contamination being present, investigations undertaken to date indicate that the level of contamination is relatively low. It is considered that any contaminants present on site will be fully remediated using proven best practice measures. As a result, no significant risk to human health or the water environment are predicted from the potential for mobilisation of existing contamination by the proposed development.

Waste and natural resources

- 4.63 While the construction of the proposed development will generate waste, the majority of this is likely to be re-used or recycled in accordance with best practice.
- 4.64 Given the small number of dwellings proposed, post-construction waste generation is likely to be negligible in the context of existing waste generation in West Sussex. No significant waste effects are therefore predicted.
- 4.65 The construction and occupation of the proposed development will use natural resources, including through land take, loss of soil resources to built development, and increased demand for potable water.
- 4.66 The site is shown to be grade 2 agricultural land. However, given that a proportion of the site is currently occupied by buildings and hardstanding, the proposal will result in a loss of approximately 4.5ha of agricultural land. This is not considered to be significant in the context of land and soil resources in the wider area.
- 4.67 As discussed in the natural heritage section above, no significant effects are predicted as a result of the loss of biodiversity.
- 4.68 Arun District Council's *Infrastructure Capacity Study and Delivery Plan, Phase 1: Infrastructure Requirements for Spatial Strategy Options* (August 2016) identifies that Portsmouth Water provides water supply services to the western part of the district. Whilst no specific capacity issues have been identified in the document, the potential for reinforcement of the existing water supply infrastructure is noted. Site specific details on the water supply infrastructure will be submitted in support of the planning application with any necessary upgrade works to provide capacity being secured through financial contributions.

Risk of major accidents and / or disasters

- 4.69 The location and nature of the proposed development mean that it is not at significant risk from major accidents and does not have the potential to lead to major accidents. The risk from flooding is addressed in the water and ground conditions section above, and the location and nature of the proposed development mean that it is not at risk from other forms of disaster.

Cumulative effects

- 4.70 Schedule 3 of the EIA Regulations requires the potential for cumulation with other existing and / or approved development to be considered. The existing baseline has been examined in the topic sections above and there are no large-scale development approved in the vicinity of the site that could lead to the potential for significant cumulative effects. As the EIA Regulations only require existing and approved developments to be considered at the screening stage, allocations in local plans do not generally need to be included.

- 4.71 However, where a development forms part of a wider local plan allocation, it may be appropriate to consider the potential for cumulative effects with the remainder of the allocation. In this case, the proposed development site lies within a wider residential-led allocation, SD5 of the Arun Local Plan. Currently, no applications have been approved (or submitted) in relation to other parts of SD5. Paragraph 025 of the NPPG: Environmental Impact Assessment (updated 2020) states that:

“An application should not be considered in isolation if, in reality it is an integral part of a more substantial development (Judgment in the case of R v Swale ex parte RSPB [1991] 1PLR6). In such cases, the need for Environmental Impact Assessment must be considered in the context of the whole development. In other cases, it is appropriate to establish whether each of the proposed developments could proceed independently (R (Candlish) v Hastings Borough Council [2005] All ER (D) 178 (Jul); Baker v Bath & North East Somerset Council [2009] All ER (D) 169 (Jul)).”

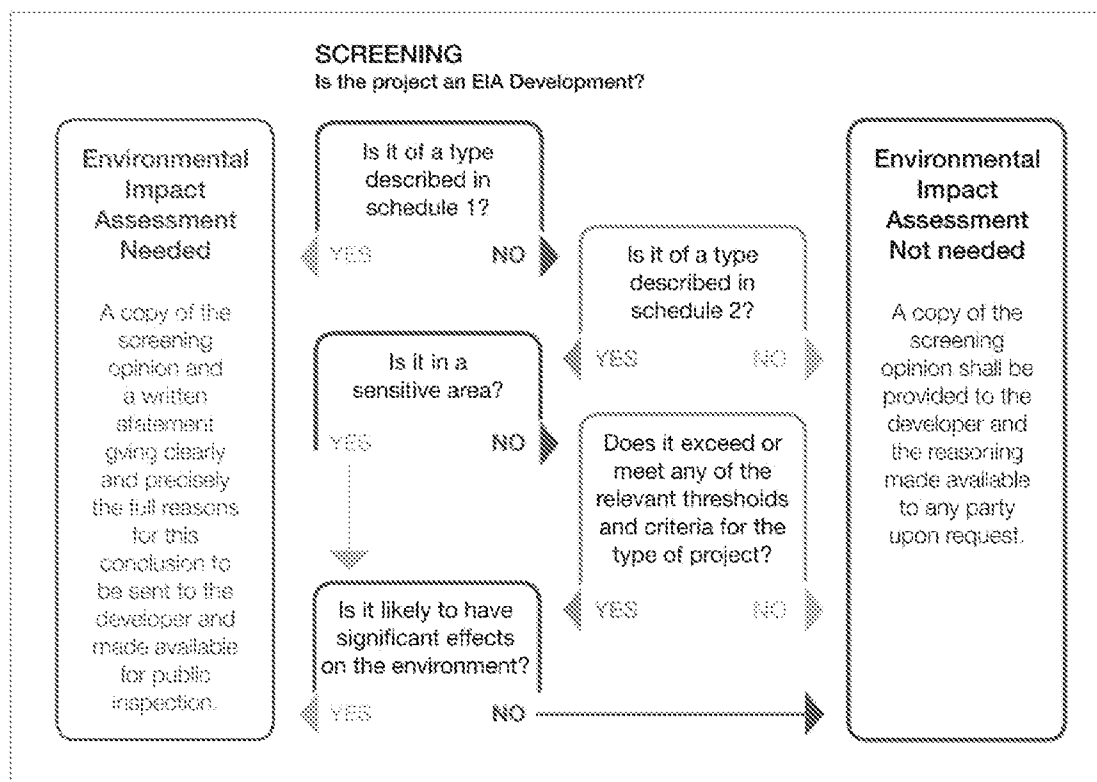
- 4.72 The key consideration is whether a development is in reality an integral part of a more substantial development or could proceed independently. The proposed development stands alone and is not dependent upon any part of the wider allocation for its delivery. It has its own site access, will provide its own public open space and effectively forms a small extension to the existing residential area of Woodgate Road and Oak Tree Lane. It is also not dependent on the realignment of the A29, which will run through the wider allocation. As the proposed development can proceed independently of the wider allocation, it should be screened on its own merit in accordance with the guidance set out in paragraph 025 of the NPPG: and the potential for cumulative effects with the wider SD5 allocation does not need to be considered.

- 4.73 It is important to note that as planning applications for other parts of SD5 come forward, the need for EIA will be considered for each scheme separately (as appropriate) but having regard to the requirements of the EIA Regulations and NPPG, including on the issue of cumulative impacts. Without looking to pre-judge future applications, it would seem likely that proposals for other parts of the allocation will be larger in size and dependent on the proposed strategic infrastructure, thus more likely to require EIA.

- 4.74 When these remaining applications eventually come forward, the Woodgate Centre scheme will already be within the planning system and may have already received planning permission. Any EIAs undertaken across the wider allocation would therefore need to take account of the potential for cumulative effects with the Woodgate Centre scheme, as it would represent an approved development (or development that is likely to be approved before the remaining SD5 applications). It will be for these EIAs to demonstrate that there will be no potentially significant adverse cumulative effects with the Woodgate Centre, as it would be the other developments that would be triggering the potential for cumulative effects. This consideration would ensure that any necessary mitigation is identified in the EIAs to minimise the potential for significant adverse cumulative effects.

Summary

- 4.75 Having examined the indicative thresholds listed in the annex of the MHCLG's web-based guidance and the relevant criteria from schedule 3 of the EIA Regulations, it is considered that the proposed development is not likely to generate significant environmental effects.



5 Conclusion

- 5.1 This appendix has worked through the screening process and concluded that:

- The proposed development is schedule 2 development
- The development site is not within a sensitive area
- The development proposals exceed some of the applicable thresholds (but are well below the 1,000-dwelling indicative threshold)

- The proposed development is not considered likely to have significant environmental effects
- The proposed development is not an EIA development

5.2 It is concluded that the proposed development will not require EIA as it is considered unlikely to result in significant environmental effects.