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**From:** Sue Howell <[Sue.Howell@arun.gov.uk](mailto:Sue.Howell@arun.gov.uk)>  
**Sent:** Monday, March 25, 2024 5:49 PM  
**To:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Cc:** Jessica Riches <[jessica.Riches@arun.gov.uk](mailto:jessica.Riches@arun.gov.uk)>  
**Subject:** Notification of an Environmental Statement AL/11/24/OUT

### Response to Planning Application

**From:** Arun District Council Leisure & Greenspace

**Date:** 24/03/2024

**Application ref:** AL/11/24/OUT

**Description:** Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission

for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

**Location:** Land East of Westergate Westergate

**Determining Authority:** Arun DC

**Summary recommendation:** ADC welcome early and continued consultation throughout this development progression and the opportunity to discuss and conclude policy requirements. This jointly forms part of the presently largest planned development proposal within the District. The details submitted within this application are somewhat vague. There are constraints within this site along with huge opportunities here for increased accessible public open spaces, the formulation of desirable living areas, improved transport links, integrated leisure facilities and the potential to enhance and add to the character in this local area.

Recommend no landscape objection to the outline proposals as presented within this AL/11/24/OUT application.

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## Comments

### Relevant landscape designations

This site will form part of a known strategic allocation SD5 identified in ADCs adopted Local Plan 2011-2031 (July 2018)

This proposed development site is open agricultural, located west of the A29 and north of the railway crossing at Woodgate.

The wider proposed development site has character areas, conservation areas and ancient monuments. The site borders the listed St Georges Church and 3 listed Farm buildings. The development site offers direct views to the South Downs National Park to the north. Falls within the National Character Area 126 – South Coast Plain.

## Response

This proposal for this site is a hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

The site forms the western most part of the BEW Strategic Site Allocation, as set out in Policy H SP2c of the Adopted Local Plan. On 25th November 2020 the BEW Framework Masterplan was endorsed as a guidance document for major planning applications within the allocation.

The site in area is approximately 19.35 ha and is proposed for development of up to 400 dwellings. The site abuts the eastern edge of Westergate and primarily comprises arable and grazing land enclosed by mature hedgerows and trees, typical of the surrounding area.

The northern boundary is defined by the southern edge of a public footpath linking Church Lane (east) and Ivy Lane (west)

The site forms part of a tract of countryside that has no statutory designation for landscape sensitivity or ecological importance in the Development Plan. Whilst there are some linear areas within the site that comprise flood risk areas and 'wildlife corridors' (hedgerows and water courses), these features could be protected and enhanced through careful master planning, habitat enhancement and Sustainable Urban Drainage System (SUDS) techniques.

The application planning statement states that amenity green space, offering potential locations for play space, community orchard and allotments will form part of the application with natural and semi-natural green space contributing towards natural habitats and proposed SUDS as part of a proposed Country Park and 'Green Ring', within the BEW Strategic Allocation. The Statement notes that connections with existing rights of way and a new public footpath and cycleway link along the eastern boundary to form part of a wider network and Country Park with reinforced hedgerows to create landscape buffers to all boundaries.

Consultation with the LPA Leisure and Greenspace departments will need to confirm onsite leisure and recreation provision and the requirement for contributions to be sought which will need to include contributions towards playing pitches, sport, leisure, pools, halls and ancillary facilities as set out in ADC SPD Open Space, Playing Pitches, Indoor and Built Sports Facilities January 2020.

Utilising the Open Space and Recreation Standards SPD calculator, this standalone application area would require a Public Open Space provision of a minimum of 3.3Ha which should incorporate approximately 4,840sq metres of Play Space. Off-site allotment contributions and maintenance sums would also be triggered by this development.

Riparian corridor needs in this section would require particular attention in terms of species selection and location – The careful selection of suitable species will need to be proposed to enhance this feature in this setting. So too would any evident chalk streams which would require specific chalk stream species repopulation and would require a detailed management plan on how to improve (potentially dealt with within LEMP in S106)

The design of the application should promote a high-quality development that respects, maintains and enhances the local landscape character. This new development should consider the character and distinctiveness of the area reflecting local design characteristics where possible and its setting with the surrounding countryside and rural fringe. This proposed development has the potential to change significantly this area. Key to this application area is proximity to the Lidsey Rife Linear Park which is to form many functions not least to provide a public accessible valley country park feature.

There will be a requirement for quality play provision throughout the development. These will be required in many forms from unequipped natural play to equipped provision offering varied and challenging play opportunities. Detailed consultation and discussion will be required for the development brief to incorporate these LAP, LEAP, NEAP and other sports and ancillary facilities. Connecting pathways for accessibility, seats, bins and signage all forming part of this

provision. Play will need to accord to a general site wide theme, be accessible and inclusive and required in detailed plan form so that the concept and proposal can be adequately assessed. **The Masterplan would seem to indicate only 1no LEAP and 3no LAPS being proposed which would appear to be under provision in line with policy.**

LVIA has been submitted (FEB 02 2024) which includes assessment of the visual effects of the development on the surrounding areas landscape which will detail any physical effects of the development such as changes in topography. The submitted EIA includes full assessment of the potential impacts of the development on local character. A LCA (Local Character Assessment) undertaken and used as the basis for guiding, informing and understanding the ability of the location to accommodate change and to inform positive proposals for conserving, enhancing and regenerating character as the detailed proposals are developed.

The LVIA concludes: Considered Moderate Adverse effect on landscape receptors mostly within 500m of boundary, viewpoints to the east less significant effect. No effect is predicted on the most distant views.

Good access for walking and cycling routes would promote green transport within and outside of the development. The inclusion of shared use pedestrian/cycle routes in and around the development would be expected to be incorporated. PRoW footpaths would appear to be affected by the proposals including Footpath 297. **Any footpath realignment considerations should not allow footpaths to be diverted purely for plot layout gain. Footpaths need to be provided within open, accessible areas and allow safe routes not diverted behind fences forming unsafe and unusable corridors.**

POS areas will need to connect within and beyond the development site promoting and enhancing footpath and cycle links and their use within the wider area. Consideration should be made to the siting of open space and buffer areas and their use in softening and integrating the proposals with the existing residential development on this fringe. POS should be considered not only for the larger open character areas but also to create sense of place, desirable living areas and distinctiveness within the plot areas.

The management proposals for all public realm and open space areas with specific and complex typologies will need to be detailed. The ultimate success or failure of the landscape proposals and public access to them, will depend on adequate provision for this in future. This must include a clear directive of envisaged responsibility and set out with this statement explaining how the differing typologies will be maintained ie responsibility and regime. Discussion with the LPA will be required to ensure that the maintenance and public accessibility needs will be met and financial contribution towards maintenance would need to be concluded were they be become the responsibility of the LPA.

#### SuDS

Policy W DM3 of the Arun Local Plan requires major development to integrate SuDS into the overall design of the development.

The primary purpose of SuDS is to minimise the impact of urban development on the water environment, reduce flood risk and provide habitats for wildlife. SuDS should increase the levels of water capture and storage. It is essential that SuDS do not impact on the usable levels of public open space also required as part of new housing developments. SuDS whilst providing benefit in the correct capacity within development, should not be included in the 'usable open space calculations'

Consideration should be given to the large area of Flood Zone 3 which extends along the Lidsey Rife and for a large extent of the Linear Park area. Additional drainage provision from

the site should not be at the expense of allowing this to be accessible and remain as a year-round POS provision.

### **Impact**

The potential impact on the location would require that Landscaping be provided as mitigation towards screening and softening of the development.

Extensive views into and from the development site to the South Downs to the north must be promoted and given careful landscape opportunity consideration.

Early consideration and evaluation should be made of existing topography and green assets. A tree survey of the application site will be required to highlight the importance of, and protection requirements for retaining trees and hedgerows. Any tree work operations at the site to be discussed in advance with Arun District Council's Tree Officer.

As a general principle of design, careful consideration should be given to the intended land use beneath existing canopy of established trees and their potential for further growth above and below ground (root and crown extension). With such a large and open site to work with we expect a detailed layout proposal to place great emphasis on eliminating future 'residential pressure to prune' of retained trees and avoid any intrusion into Root Protection Areas (BS5837:2012).

Trees which display considerable landscape and/or ecological value should be incorporated into an area of open space and be so remote from any development such that they can project (existing or potential) veteran status without being subject to any risk mitigation pruning works in the future.

**In general, habitats such as deciduous / priority woodland would not be supported to be cleared and replaced with dwellings or amenity space.**

### **Mitigation/requirements**

An existing green boundary is evident in places, indicated buffer zones and further boundary planting treatment will need to demonstrate the ability to enhance and improve. A robust and detailed landscape scheme will be required within these proposals for all areas of development and POS to increase biodiversity and habitat within this rural fringe site.

All greenspaces should be considered and valued and their connection for biodiversity and habitat explored. Tree specification should be at a size which allows instant impact, but which will establish and mature as the site develops.

**Biodiversity Net Gain - In line with Policy ENV DM5 of the Arun District Local Plan information on Biodiversity Net Gain will need to be provided.** A Biodiversity Net Gain Assessment would need to be submitted indicating a net gain across the site post development.

### **Recommendation/Conclusion**

ADC welcome early and continued consultation throughout this development progression and the opportunity to discuss and conclude policy requirements. This jointly forms part of the presently largest planned development proposal within the District. The details submitted within this application are somewhat vague. There are constraints within this site along with huge opportunities here for increased accessible public open spaces, the formulation of desirable living areas, improved transport links, integrated leisure facilities and the potential to enhance and add to the character in this local area.

Recommend no landscape objection to the outline proposals as presented within this AL/11/24/OUT application.

**Sue Howell**  
**Leisure and Landscape Officer**  
Environment and Climate Change

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** Thursday, February 15, 2024 5:19 PM

**To:** Tree Landscape <[Tree.Landscape@arun.gov.uk](mailto:Tree.Landscape@arun.gov.uk)>

**Subject:** Notification of an Environmental Statement AL/11/24/OUT

To: **Parks and Landscapes**

#### NOTIFICATION FROM ARUN DISTRICT COUNCIL

**Application No:** AL/11/24/OUT

**Registered:** 12th February 2024

**Site Address:** Land East of Westergate Westergate

**Grid Reference:** 493930 104881

**Category:**

**Description of Works:** Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and

east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

**This Application is the subject of an Environmental Impact Assessment**

I am in receipt of the above application, please click the link below to view the Environmental Statement that has been submitted with this application.

[Click here to view documents available on our website](#)

[Click here to view the status of the application](#)

I would be grateful for your electronic comments made either on line on the website or by emailing back to [planning.responses@arun.gov.uk](mailto:planning.responses@arun.gov.uk) by **31st March 2024**

**Please be aware that any comments you may make will be available on our website.**

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Mr D Easton

Planning Case Officer- Arun District Council

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