

Site layout and Landscape plans have been submitted to discharge Conditions placed on the approval of outline application A/99/17/OUT (access only) for **up to 175 residential dwellings** located to the south of Water Lane, Angmering.

Achieving the **maximum 175** dwellings depends on meeting these Conditions, as well as Policies in the Arun Local Plan and supporting Arun Design Guide SPD.

Background: The Landscape and Visual Impact Assessment (LVIA) concludes that *“the long-term impact is considered to be Minor Adverse”* and will be *“. . . restricted to residents immediately adjoining the Proposed Development [Angmering Conservation Area and Avenals Farm] and users of existing footpaths [PROW 2148]”*.

It goes on to say *“As an allocated site for development the principal for land use change has been accepted in principal and visual effects are to be expected.”* This was not the view taken by the Inspector at Arun Local Plan examination.

Principal of development on this site and its inclusion in the Arun Local Plan, was only finally agreed after assurances were given to the Inspector that convinced him that the introduction of a substantial landscape buffer on the eastern boundary of the site would limit views of the development from the National Park and PROW 2148 to *“glimpses of rooftops”*. See A/99/17/OUT Officer’s Report.

Therefore, I **OBJECT** to this application for the following reasons.

1. **Condition 7 criteria have not been met:** The following supporting documents are at odds with each other.
 - **The Landscape and Visual Impact Assessment (LVIA)** says that long term management and maintenance of *“areas of strategic vegetation within the public realm”* will be retained and its condition well maintained *“in perpetuity”*. However most of the existing hedgerow being relied on to provide screening of the development is outside the site boundary, therefore not in scope.

Key viewpoints do not include ALL those presented to the Inspector at examination from 5 key receptors in the National Park and PROW 2148, the closest one in particular.
 - **Landscape Design Strategy** says *“Substantial strategic landscape has been provided along the boundaries of the site, especially along the eastern boundary with the A280 and enforcement of existing hedges and tree planting along the western boundary.”*
 - **Illustrative Landscape Plan JBA 18/019-SK01 Rev F:** shows the *“substantial strategic landscape”* planting on the eastern boundary. The key describes the existing buffer planting as trees to be retained and supplemented by proposed native buffer planting, broadleaf, ornamental and native trees. It also shows the parking bays that have been inserted into the buffer.

The *existing buffer planting* is outside of the site boundary. It is the WSCC A280 “cutting” embankment planting; therefore the applicant has no control over, or responsibility for maintaining its effectiveness as a permanent landscape buffer.

It does not show any gaps in the planting. This is at odds with the “*scenic views over the National Park*” described in the DAS.

The following documents commissioned from AAP Architecture appear to have been given a different brief by the applicant.

- **Planning Layout - Dwg: PLN-1-1101 Rev T:** Insertion of parking lay-bys into the proposed 5m to 9m landscape buffer has significantly reduced the proposed “*Substantial strategic landscape*” planting on the sites eastern boundary.

The LVIA gives the height of the existing “native hedgerow” as approx. 4 meters. With proposed ridge heights of between 10 and 12 meters it is difficult to see how views of the site will be “. . . *limited to glimpses of rooftops over existing vegetation*”.

Tree planting shown in the Illustrative Landscape Plan is significantly reduced and what was described as “*native buffer planting*” has been re-labelled “*indicative shrub planting*”, inferring a less robust boundary treatment

- **A/99/17/OUT: Parameter Plans Land Use and Building Heights 1911-P02 Rev I** Plans differ to those approved, with additional housing in the south west corner of the site replacing a SUDS basin. Building heights have also been amended

2. Fails to meet LP Policy D DM1: Aspects of form and Design Quality;

- a) The DAS makes reference to the Arun Design Guide SPD, but there is no evidence of any attempt to comply with the guidelines. See also point 4 below.
- b) The proposed Planning Layout is not sympathetic and does not respond to the site’s surrounding landscape or location in terms of building height, density, proximity to the National Park.
- c) Buffer planting proposed in the supporting Landscape Design Strategy and Illustrative Landscape Plans are not reflected in the DAS or Planning Layout.

3. Fails to meet LP Policy LAN DM1 Protection of Landscape Character; The DAS **does not** identify the eastern edge of the site as a “sensitive boundary” with the potential to impact on the setting of the National Park. An issue highlighted by the Inspector’s findings at Examination.

“A viewpoint assessment was carried out by the Council from 5 new viewpoints from within the National Park as requested by the Inspector.”

“A generous planted mitigation buffer is suggested along the eastern edge of Site 12D (i.e. with the A280) and pockets of planting within the site to address the visibility of some rooftops.”

Appears to have failed to meet Officers assurances on approving outline permission that. . . *“the SDNPA will be involved in the planning of the design and layout of the site from an early stage”*

The DAS proposes retaining existing gaps in vegetation to allow *“scenic views over the National Park.”* from the developments *“Sussex View Character area”*.

4. Fails to meet LP Policy HSP2c criterion e) which was inserted into the Local Plan at examination to support the MoU agreement between Arun and the SDNPA.

The Officers Report recommending approval of A/99/17/OUT, and emphasised by officers at Arun’s DCC meeting, states:

“In the spirit of the MoU and paragraph 115 of the NPPF, it is fundamental that ADC works with the SDNPA and the applicant at an early stage of the Reserved Matters application to ensure that the design of the scheme is 'landscape led'. . .

Plus “any views of the South Downs National Park would be limited to those areas east of the site and would be limited to glimpses of roofs over the existing vegetation. These views would be further filtered by the mitigation planting proposed along the eastern boundary of the site.”

- a) The applicants detailed LVIA confirms the height of the existing native hedgerow as approx. 4 meters. This contradicts the statement that visibility of the site is restricted *“to glimpses of roofs over the existing vegetation”* when proposed dwelling heights are between 10-12 meters!
- b) The existing vegetation is WSCC A280 “cutting” embankment planting. It is outside of the site boundary. Therefore the applicant has no control over, or responsibility for maintaining it as a landscape buffer, long term management or maintenance of its condition *“in perpetuity”*.
- c) The Landscape buffer planting on the eastern boundary of the site bordering the National Park needs space to establish and thrive if it is to mature and reach the density and height required to achieve its objective.
- d) The insertion of lay-bys means it is less likely to reach its potential. As it matures over time there will be a temptation from residents to prune back or even remove it to avoid the “nuisance” of wet leaves, debris, bird droppings etc soiling parked vehicles and preventing their ease of getting in and out of their vehicles.

Arun Officer’s request that the landscape buffer on the sites eastern boundary proposed in Illustrative Masterplan DWG 911/P03 (A/99/17/OUT) be increased by a further 5 meters was dismissed by Rydon, who regarded 5 to 9 meter as sufficient. With the insertion of lay-bys, this increase now seems eminently sensible.

5. **Condition 28 has not been met:** The site slopes from north to south towards the proposed SUDS (attenuation) basin and drops down on to the A280 bypass. The drainage strategy for the site still needs to be agreed and must include calculations to show where the runoff from this part of the site will go if the basin fails to work properly.
6. **Fails to meet LP Policies W DM2 Flood Risk criterion b): and Policy W DM3 Sustainable Urban Drainage Systems criterion j):** The basin is sited close to the Ecclesden Lane/ A280 junction where there has been a history of flooding problems since the by-pass was built. This is currently being looked at by WSCC via Operation Watershed as part of works to resolve the flooding issue in Cow Lane and must not be undermined by potential unplanned run-off as a result of the proposed development on the opposite side of the A280. Indeed, help in resolving the wider drainage problems surrounding the site, will help reduce flood risk overall.
7. **Site and Landscape layouts and final dwelling numbers should not be submitted until approval of A/110/20/RES** and the site drainage and flood risk management strategy are agreed and confirmation of final ground levels as a result. Not the other way around.

From the documentation submitted with this application, it seems DWH's intention is to attempt to develop this site on their own terms - regardless.

Perhaps the best advice for Officers and members of Arun's Development Control Committee in assessing this application is that given by the applicant's **Landscape and Visual Impact Assessment**. It says *"Views and visual amenities are best experienced in the field."*

That is what the Arun Local Plan Inspector did.

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