

Angmering Parish Council continue to **OBJECT** to the proposed Landscape and Site Lay- out Plans submitted with A/109/20/RES and the impact the development will have on the setting of the South Downs National Park.

Evidence provided by Rydon's Landscape and Visual Impact Assessment (LVIA 2017) influenced the width of the landscape buffer on the site's eastern boundary in the approved Parameter Plans, and subsequently the proposed site layout. However, new documentation submitted with A/109/20/RES has shown this evidence to be unreliable.

For the following reasons we believe the application, which is based on the Parameter Plans approved by A/99/17/OUT, should be withdrawn.

1. The Rydon LVIA (2017) informed the Parameter Plans approved by A/99/17/OUT.

- a) Approval of A/99/17/OUT was based on assurances given by the Rydon LVIA that a substantial landscape buffer already existed on the site's eastern boundary and so any additional mitigation could easily be accommodated by a 5.5m to 9m landscape buffer.
- b) It said that *"any views from 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" ". . . which . . . "would be further filtered by the mitigation planting proposed along the eastern boundary of the site."*
- c) This was repeated in the detailed Arun LVIA provided to the Local Plan Inspector at EiP to allay concerns he raised following an unattended site visit, that development on this site would impact upon the setting of the national park,
- d) It was included in the Officer's Report recommending approval of A/99/17/OUT.
- e) The same assurances were repeated by Officers in reply to concerns raised by Cllrs at the Arun DCC meeting that approved A/99/17/OUT.

2. BDW commissioned a new LVIA (March 2020) to support A/109/20/RES. It was not influenced by the previous document. The list of referenced documents in "Appendix A" does not include the Rydon LVIA or the Arun LVIA submitted at EiP.

3. The findings of the LVIA (March 2020) on the extent of the landscape buffer are materially different to the LVIA Rydon submitted in support of A/99/17/OUT.

- a) There is a photograph of the actual hedgerow on the site's eastern boundary, which it estimates as being *"approximately 4m high"*. This is corroborated by Engineering Layout Sheet 1 A290-RM-401 Rev P3 as well as other detailed engineering plans, which all show the boundary fence height as 1.4m and the Hawthorn Hedge height as 3m.

- b) It is obvious the hedgerow is not capable of limiting views of the development from the national park, to just "glimpses of roofs over the existing vegetation".
 - c) To deliver this objective there will need to be a significant increase in the width of the landscape buffer shown in the Parameter Plans to at least the 15m originally requested by Arun. More if it is to include parking lay-bys.
- 4. The Officer's Report recommending approval of A/99/17/OUT also committed to involve the SDNPA at an early stage of the Reserved Matters application to ensure the proposed development was landscape led. This did not happen.**
- a) It is unclear how the Plans can be landscape-led when the applicant ignored the obvious differences in the information provided by the new LVIA (2020) when compared to the Rydon LVIA (2017) and in doing so, ignored the potential impact on the setting of the national park detailed in the objection raised by the SDNPA.
 - b) Instead, the development appears to be driven by the granting of outline permission for "up to 175 dwellings", which A/109/20/RES and BDW in their Supplemental Planning Statement, appear to have taken as a target figure that it has managed to achieve by ignoring the site's constraints. For example, by removing landscape buffer space between development and the southern boundary of the Angmering Conservation Area that had been included in the approved Parameter Plans.
 - c) Regardless of the SDNPA's non-attendance at the Angmering Advisory Forum, National Planning Policy Guidelines are clear that the local planning authority has the same duty to uphold the *delivery of the statutory purposes of the national park* and therefore is responsible for addressing the issues raised by the SDNPA's objection.
- 5. The Site-layout and Landscape Masterplans submitted with A/109/20/RES do not comply with the NPPF 2019, or the Objectives and Policies in the Development Plan for Arun, which include Policies in the Angmering Neighbourhood Plan covered by APC's previous objections**

The BDW Supplemental Planning Statement (October 2020)

The Development Plan

BDW - The National Planning Policy Framework (July 2018) is a material consideration in the determination of all planning submissions and in this instance due regard has been given to those policies pertinent to design only. Matters relating to the principle of development were considered at outline stage prior to the grant of outline planning permission.

APC's Comments: The NPPF 19 Feb 2019 replaced the July 2018 version. It was revised yet again in June 2019. This is important, as the NPPF 2019 introduced additional clarification in relation to the protection of the environment, the setting of National Parks as well as Listed Buildings and Conservation Areas.

This may explain what appears to be a lack of attention to detail in the Rydon LVIA (2017) and lack of concern about boundary treatment and the proposed development's impact on the national park and heritage assets, when compared to the new LVIA commissioned by BDW which was based on the 2019 NPPF.

Landscaping

ADC - The pre-application response confirmed that a landscape scheme will be required and queries the landscape buffers around the site.

BDW - The proposed development is supported by a Landscape Masterplan, detailed landscaping and open space hard and soft landscaping drawings and a Strategy Booklet. The residential development proposed provides significant landscape buffers, comprising native trees and evergreen species along most boundaries. By way of example, the buffers along the western boundary of the larger parcel of development are 2.5m in width and **the boundary between the site and A280 is circa 8m plus the additional proposed landscaping.**

APC's Comments: Yet another comment based on what appears to be a "Google Earth desk top study". What does the width of a significant landscape buffer on the site's eastern boundary have to do with the distance of the boundary from the A280? The planting on the A280 cutting embankment is patchy and below site level.

Summary of comments from Statutory Consultees and BDW Response

South Downs National Park (16.10.20)

The consultation response . . . refers back to their opposition to the original outline planning application parameters plans and lack of engagement in the design process.

BDW i) The proposals have been presented to the Angmering Advisory Panel, comprising key Angmering stakeholders, on a number of occasions both pre and post submission. The Panel does not appear to be attended by the Parks Authority.

APC's Comments: Regardless of the fact that the SDNPA did not attend this meeting, Arun as the local planning authority has a duty to uphold the *delivery of the statutory purposes* of the national park and hence resolve the issues raised by the SDNPA.

<https://www.gov.uk/guidance/natural-environment> FAQ's:

What are the statutory duties of local planning authorities in relation to National Parks, the Broads and Areas of Outstanding Natural Beauty?

This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection."

. . . and

How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account."

Following the SDNPA's objection to **A/99/17/OUT** the applicant (Rydon) asked officers to consult with Arun's Leisure and Landscape Officer. The Officer's response (26th September) supporting the position taken by the SDNPA, is reproduced in full in the Planning Officer's Report.

BDW ii) The scheme is based upon the requirements of the approved Design and Access Statement, parameters plans (which specify the developable area and building heights) and is supported by a Landscape Visual Impact Appraisal. The principle of development is established by virtue of the outline planning permission and the proposals are well within the specified parameters.

APC's Comments: It is not disputed that outline approval has been granted in principal **subject to addressing the constraints imposed by the sites location**. The potential to impact upon the setting of the South Downs National Park is one of them. The SDNPA has raised an Objection and National Planning Policy places great weight on the protection of the setting of national parks.

The new LVIA March 2020 submitted by BDW has material differences to that submitted by Rydon and approved by A/99/17/OUT. The most significant, is that it undermines the statement that *"any views from 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". . . which . . . "would be further filtered by the mitigation planting proposed along the eastern boundary of the site."* It does not find this to be the case. It says the hedgerow on the site's eastern boundary is only about 4m **high**, which in no way could provide the level of screening stated in the Rydon LVIA. Despite this document being commissioned by BDW, its contents appear to have been ignored in favour of the original LVIA when designing the site-layout.

BDW iii) Notwithstanding this, the proposed amendments are considered to respond to any perceived visual impact by reducing the height of the apartment block in the north east corner of the site to 10.4m (to ridge), well below the 12m specified by the parameters plans.

In addition the northernmost edge of the . . . result is a high quality landscape-led development, of a character in keeping with the village of Angmering.

APC's Comments: The reduction in height and re-design of the apartment block and northernmost edge of the development is welcomed, but the design does not reflect the materials used in local barns e.g. Pigeon House and includes Velux roof windows which impact on the national parks Dark Skies status. Nevertheless, the issue still remains of how to deliver the landscape buffer on the sites eastern boundary with the national park as described by A/99/17/OUT.