

1. The proposed site location is on land between East Preston and Ferring. This land is identified as a "Settlement Gap" in the Arun Local Plan (Policy SD SP3). The Local Plan states that settlement gaps will be protected to prevent coalescence and retain their separate identity. Building on this land would contravene the Arun Local Plan so the application should be refused.

2. Pre- Application Advice

2.1 Pre-application advice was sought and the advice given is set out in a letter from Mrs Gardner of Arun District Council Planning Department dated 23rd April 2021.

2.2 The letter sets out the key policies in relation to the application:

The key policy considerations in the determination of this pre-application are considered to be C SP1, D SP1, D DM1, and SD SP3 of the Arun Local Plan.

The proposed development contravenes many aspects of these policies as set out below.

Policies D SP1, D DM1, and SD SP3 deal with the visual and residential amenity issues including the impact on the designated gap (the site lies within the western side of the East Preston to Ferring Local Gap).

The letter states that the proposed development:

- is contrary to Policy SD SP3(a)
- is contrary to Policy SD SP3(b)

With regard to Policy D DM1 it states:

...it is considered that the proposal will not give rise to unacceptably adverse effects on the established character of the locality

... the indicative layout is generally acceptable

... the area of open space in the south east corner includes the area of the overhead pylons and this cannot be included within any open space provision calculations since it would not be usable.

Clearly it is considered that there will be some adverse effect on the character of the locality and there are some unacceptable issues with the layout.

Policy C SP1 deals with the countryside and states that residential development outside the Built Up Area Boundary (the site lies outside the nearest BUAB) will not be permitted unless in accordance with policies in the plan which refer to a specific use or type of development. It was noted that none of these relate to the proposed development at the application site and therefore:

- the scheme would conflict with Policy C SP1

2.3 The letter also refers to Policy SD SP1 “Sustainable Development” stating that the Council will work to secure development that contributes to the social, economic and environment conditions south of the National Park through to the coast and throughout its settlements. The pre-planning advice concludes that the proposal represents sustainable development (paragraph 5, page 7 of the Pre-Application Advice letter). I do not understand how this conclusion can be reached for the following reasons:

- a. The site is a 2.9 hectare grade 1 arable field used to grow crops. The pre-application advice recognises that there is a potential economic cost if this agricultural land is lost. However, it is not only an economic cost there are also many environmental costs:
 - loss of wildlife habitats
 - increased air pollution
 - increase in water runoff
 - loss of soil which plays an important part in mitigating climate change (soil is an important carbon sink)
- b. The development includes the provision of 201 parking spaces. This must be the developer’s estimate of the number of additional cars expected as a result of the erection of 76 dwellings. Cars are a major contributor to air pollution.
- c. The letter sets out distances to certain services:

Nearest pub (considered to be the Premier Inn) 1km

Nearest shop (Asda) 800m

Angmering Railway station 1.5km

Additional shops in Angmering and Ferring (distances not given)

The conclusion reached is that the site is environmentally sustainable as it will be possible for residents to use non-car means of transport to access the primary school, local shops and other services. However, it is known that busy roads inhibit walking (the A259 is already very busy) as well as having a negative impact on people’s health and wellbeing.

3. Traffic

The housing development with spaces for 201 cars is bound to have an increase the level of traffic on the A259 and increase congestion at the roundabout. The Transport Assessment concludes that there will be one additional vehicle movement every 1.5 minutes in peak period; as anyone who has travelled at peak times knows, traffic is not spread evenly over time. There are already queues when approaching the A259/Old Worthing Road/A280 roundabout, often in all 4 directions; all traffic relating to the proposed development will have to go to this roundabout as it will only be possible to go west to the roundabout when leaving the site.