



Established 1894

Angmering Parish Council

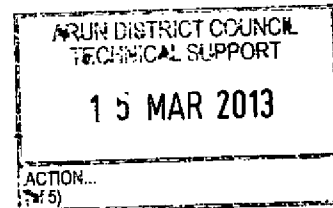
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Cian Cronin,
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Arun District Council,
Arun Civic Centre,
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LITTLEHAMPTON,
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15 March 2013

Dear Cian,

Angmering Parish Council **OBJECTS** to Planning Applications [REDACTED] A/16/13CA, for 'Proposed demolition of existing Chandlers BMW dealership and Pharers (Sic) Courtledge and erection of 22 dwellings (including 7 affordable dwellings) with associated, car parking, access roads and landscaping.', for the reasons detailed below.

Apart from the comments in this letter, the attached appendices A to E should be treated as **material considerations**.

The Parish Council understands and supports the principle of housing development on this site, but considers that the application made does not take the opportunity to provide what such a prime site should.

On the positive side, the site is within the built-up area boundary and, as such, should be actively considered for possible housing development. The removal of the car sales facility from this site provides a number of benefits such as:

- No more car deliveries
- Less all-day parking in Water Lane
- No more confrontation between residents and Chandlers workers

In addition, there is the potential for truly affordable housing to be provided in the village centre, although the opportunity for this to be provided through the emerging Community Land Trust has thus far been missed.

On the other side, however, the application made has missed a number of opportunities to rectify some of the identified issues currently existing.

In particular, the need to retain a thriving village centre was paramount and one long-standing constraint to this was the lack of adequate parking provision in the village. It is believed that a parcel of land from this site should be made available to provide additional public parking.

Additionally, the removal of the facility will lead to a loss of employment in the village, which may or may not be contained locally, dependent on where the replacement facility is built.

The need for the types of houses proposed has not been demonstrated adequately, with the view that there are too many bedrooms being included, with each property having too small a footprint and being too tall. The result is designs that are totally out of keeping with the surrounding dwellings and the Conservation Area.

No footpath in front of the houses in High Street has been proposed, leading to the residents being compromised as they have to step straight onto the road, which is already dangerous. This should be provided as part of the development.

There are two vehicle accesses proposed in Water Lane, within yards of each other. One of these is a footpath crossover which has obvious safety issues for pedestrians, apart from the danger to traffic coming into and out of the village along Water Lane.

The provisions made for disabled access to the properties is non-existent, made necessary because the proposed solution to probable flooding of the site is to raise the ground floor levels of the houses and give access by steps. A more innovative solution to the flooding issues would obviate the need for this.

The whole principle of dealing with flooding by accepting it will happen, rather than offer a contribution to its avoidance, is flawed. The Parish Council is of the view that flood storage works up-river from the village is a way of significantly reducing the chances of flooding happening and it is suggested that the developer should consider whether making a significant contribution to such a scheme would reduce the probability of a flood event and negate the necessity to carry out complicated and expensive building works, thereby making the development more sustainable.

The development will mean that there will be more traffic moving around the village for longer in the day, than the dealership. Whilst there will no doubt be an improvement in the parking situation in Water lane, there will still be a need for more village centre parking facility, which is a problem already. This development is the one and only opportunity for this problem to be addressed and an allocation of a small amount of land from the site could be made to provide the space for some more public parking spaces to service the village centre retail shops.

In general, the design for this proposal has been disappointing with the units at 2.5 stories being too tall for the position, with the result that the High Street frontages, in particular, potentially overwhelming the surroundings. The proposals look just like any other new houses in the middle of a large estate and appear to make very little reference to the nature of the Conservation Area.

Contravention of Planning Policies

The main policy concern is that the proposals are for building in flood area FZ3 which is at risk from both sea level rise and, more immediately, pluvial run-off from the Downs. Whilst these are not, in themselves, reasons for not building, the necessary work to negate the effects is not adequately covered. The Sequential Test process described merely concludes that there is no land in the ownership of the proposer to replace that in question, which is an obvious conclusion. What is not addressed in the Test is the fact that there is land elsewhere that does not have a flooding problem, whereas this does.

Errors and Omissions within the Application

The application is for **Full Planning Permission**, which requires all supporting Statements and details to be included and current. However, there are a number of areas where it is stated that further work needs to be done.

- The design of the proposal needs to be revisited and a more appropriate layout and housing-type put forward.
- The Flooding Assessment needs to be more robust, given the very recent history of flooding in and around the site. This may include proposals to help avoid village centre flooding from happening – this would be a valuable contribution to the future of the village.
- Further Highways Assessment work is required as detailed in both the report from the Parish Council attached and from West Sussex County Highways department.
- The site was formally a garage serving fuel and that, together with its current use, implies there is more potential for soil contamination than indicated by the report included with the application.

On behalf of our parishioners, Angmering Parish Council **objects** to this application.

Yours faithfully

A black rectangular box redacting the signature of the Clerk to Angmering Parish Council.

Clerk to Angmering Parish Council

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PLANNING SUPPORT STATEMENT

Introduction

1. Although the housing mix is policy compliant, it does not truly reflect the need identified in the Angmering Housing Needs Survey. There are a total of 7 units designated as 'Affordable', with 6 of these being offered as 'Social Rented'. This is a prime site in the village centre and the Parish Council believes that more of these properties should be available for part-purchase by people with a local connection rather than just offered up to outside people on the Arun District Council Housing list. It is for this reason that the Angmering Community Land Trust (ACLT) is being formed and the 'Affordable' properties on this site would be the ideal starting-point for the ACLT.
2. Eight of the fifteen open-market homes are 4-bedroomed houses and, once again, there is no need identified for houses of this size, which will inevitably be expensive given the position of the site. Consideration should be given to more, smaller, properties being built instead, to give local people the chance to purchase.
3. The quote from this section of *'The existing development is representative of a discordant Village centre use and any redevelopment should be seen to repair both the existing townscape as well as providing for improved living conditions for neighbouring residents'*. This exactly the right approach, but the proposed development does not sufficiently achieve these laudable aims.

The Site

4. The reference to the Conservation Area does not emphasise that Phares Courtledge is in it, and that a number of the houses being proposed will also be within the boundary. This requires a higher level of consideration given to the visible aspects of these houses. This is not to mean that the remainder of the site should be built to a lower standard, just that the whole development should aspire to being good enough for the Conservation Area.

The Scheme

5. There is constant reference in this document and the Design Statement to the importance of 'Eachways' as a landmark in the village. Unfortunately, the proposals do not adequately use this landmark as a reference point and the adjoining houses on both High Street and Water Lane appear to be too tall (2.5 stories rather than 2) and with a completely different design, that will jar when viewed with 'Eachways'.
6. The scale of the proposed buildings will also overwhelm the lower part of High Street, with 2.5 storey properties gradually stepped (although this is not clear from the application) up the hill with their frontages very close to the road.
7. From the drawings supplied, the proposed buildings would have an overall height of 11 metres compared with Eachways at 8 metres.
8. There is no proposal to construct a footpath in front of the High Street properties which is considered essential. The residents of properties numbered 11 to 17 would be expected to come out of a path of just a few feet straight on to the High Street. This is already a dangerous hill with yellow lining that is generally ignored by drivers and a footpath from

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here to join that next to Angmering Villas would improve safety for residents and actually contribute to the amenity available rather than just mitigate against problems caused by the development.

9. Reference is made periodically in this application to the current position, but this is irrelevant as it is, by the applicant's own admission, a discordant Village centre use – in other words, anything would be better than the current use.
10. The reference to the current wide-fronted cottages in Water Lane is then translated into a proposal that terraces of narrow-fronted units looking like wider ones. Why not just build wide-fronted cottages?
11. The problem is that this is an attempt to squeeze too many properties on to a site to maximise the development potential, and consequently profit. This pays very little respect to its position and will produce a development that is overbearing and inappropriate.

Policy Overview

12. The usual analysis of planning policies that appear to support the application, whilst ignoring those that do not is included.
13. In relation to flooding, there is a major issue here because this site is known to flood already, without taking into account the potential for sea-water rise. The attached report on flooding deals with the claim that sufficient has been done by the applicant. This is patently not the case, because a statement has been made that there is no other previously developed site available in the built-up area boundary that could be developed before this one. This is not true, because the site to the north of Mayflower Way is just such a site with no flooding issues. The problem really is that the proposed site is owned by Chandlers and they need to sell it, so it is a case of 'they would say that'.
14. There is reference to the weakness of the application for the new facility with a veiled threat that they might have to go somewhere outside the district if it is turned down. What this is doing in this application is uncertain.

Planning Appraisal

15. **Principle of Development** – this attempts to say that both existing applications are inextricably linked, stating that one cannot happen without the other. Whilst it the case that for Chandlers this is the case, this application deals with the just the provision of houses on this site, and that is what should be considered.
16. **Heritage Impact Assessment** – most of this is written in planning-speak using phrases such as 'strong visual punctuation', 'visual separation', 'historic grain' and 'framing elements to the keystone building'. In reality, what will be truly visible is a number of small properties, 2.5 stories high that will look completely out-of-place with 'The Lamb' and 'Eachways', built with little regard to the 'vernacular' for this part of the village for maximum profit.
17. If an attempt is to be made to justify further development on the basis of things that were on a map in 1911, it is best to check facts. From photographs on show in The Lamb, it can be seen that the mysterious 'development' seen were Bunnes Cottages (Flint-faced, in the same way as Eachways) and tehse were demolished in 1937! One can be sure that, in line

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with other existing properties in the Conservation Area, these were what could be considered as truly 'Affordable'.

18. The applicant considers that the proposed development is considered to enhance the character and appearance of the streetscene. This would not be difficult given the current BMW buildings, but the question is whether it enhances it enough to fit in with the Conservation Area. The Parish Council believes that it does not.
19. **Flooding** – the need to carry out a **Sequential Test** is dealt with at some length with the conclusion that this is the only site that is sustainable. The problem is that the analysis of this problem concludes that the site at the south of the village, just north of Mayflower way, is not suitable because it is not sustainable because it is further away from the centre of the village. Apart from the fact that the applicants for the West End Nursery site opposite have argued the opposite, there is no mention in this section of the fact that it does not flood whereas the proposed site is very susceptible to flooding and requires extensive mitigation measures.
20. The final issue dealt with is the fact that Chandlers do not own the alternative, so alternatives should not be considered. This is a circular argument, with the conclusion that the proposal meets the sequential test. There is an alternative site for this development and this should be clearly understood.
21. **Flood Mitigation/Design** – the flooding assumptions included here seem to be flawed. The flooding incidents experienced in the village, most recently on 11th June 2012, resulted from extreme rainfall overwhelming the underground culvert that takes water from Highdown Hill and surrounding areas on the North-East of the village to the Black Ditch and from there to the River Arun. When this occurs, the floodwater flows along Water Lane, through the proposed site and collects in the village centre and no amount of increased absorption in the site will make any difference. What would make a difference would be a contribution to a scheme to avoid the flooding occurring in the first place with some form of water collection at the northern end of Water Lane.
22. **Layout, design, scale, form and appearance** – as mentioned before, the statement that this proposal has full regard to the surroundings is disputed.
23. The high density quoted reflects the need to maximise the profit from the sale of the land. The houses are too densely packed with too many bedrooms for the site. The result is that the houses are taller and more imposing than the local architecture and, as a result, overwhelm the surroundings.
24. **Parking and Access** – the first statement made is that the development is in close proximity to most things, including Angmering Primary School – there are two in fact and they are both full!
25. The parking position will no doubt be better than it is currently, but there is a view that the development should offer an area of public parking, which is sorely needed in the centre of the village.
26. The access arrangements to the site are not satisfactory. There are two accesses proposed within a short distance of each other along Water Lane, it would appear to enable the Open Market separated from those that are 'Affordable'. This is going to cause accidents and compromise pedestrians using the footpath on that side of Water Lane.

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27. There is no footpath proposed in front of the houses in High Street, meaning that residents would come straight on to this dangerous road from their gates, at the end of a very short front garden path. Such a footpath should extend to the top of the hill to meet the existing one and enable safe pedestrian access to Water Lane without having to cross the High Street twice, as currently.
28. There is a statement that safe and suitable access through to High Street can be achieved for all people, including the mobility impaired. The houses being proposed will all be raised above the ground and accessed by means of steps, which will be impossible for most mobility impaired people to use.
29. **Other matters for consideration** – A section 106 agreement is still to be put together. It should include matters such as the flooding avoidance measures discussed above and some allocation of land to provide for additional public parking, as well as ensuring that a footpath is provided in High Street.

Conclusions

30. Most of the statements contained in this section have been challenged above, with the conclusion that the proposal does not make the most of this unique opportunity to develop a site within the Conservation Area.
31. It is not enough to say that a development is sustainable, but this needs to be demonstrated beyond doubt and this statement does not do that.
32. The Parish Council believes that it is inevitable that this site is to be developed for housing, although there is an argument for continuing employment use for the land. There is a view, however, that if housing is to be allowed then there should be a number of benefits accruing to the community, given its prominence in the village.

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RGP TRANSPORT PLANNING STATEMENT

Executive Summary of Findings

Concerns are raised in respect of road safety as a result of the application as presented -

- The proposed footpath along Water Lane is narrower than the required standard; there is inadequate provision for mobility impaired pedestrians on the footway to cross the proposed site access road; the wide radius of the junction access will encourage high vehicle speeds entering the site, conflicting with the shared surface layout immediately beyond.
- The primary pedestrian route south from the site onto High Street, does so directly into the live traffic lane, there being no established or proposed footway along the relevant side of High Street. This will result in pedestrians having to cross the road from between parked vehicles (either loading / unloading or parked when outside the hours of traffic regulation) and potentially coming into conflict with passing vehicles.
- The proposed dwellings fronting onto High Street, have their front access directly abutting the live traffic lane, there being no established or proposed footway along the relevant side of High Street. This will result in pedestrians having to cross the road from between parked vehicles (either loading / unloading or parked when outside the hours of traffic regulation) and potentially coming into conflict with passing vehicles.
- No consideration appears to have been given to providing suitable pedestrian crossing facilities across Water Lane, for the increased numbers of persons requiring access to primary school provision within the north of the village.
- The supplied information does not adequately demonstrate the site's ability to be accessed by service vehicles, when other vehicles are parked on Water Lane.
- The application over estimates the potential for sustainable transport to be utilised by residents, owing to the limited hours of operation offered by the existing providers. Accordingly and acknowledging the high levels of private car ownership locally, there will be an over dependence upon this mode of travel.

Additionally -

- The site's internal parking layout appears cramped, resulting in restricted pedestrian access to the primary walking route south from the site towards High Street.
- The majority of dwellings have no suitable access - front or rear - for the mobility impaired, particularly wheelchair users. Whilst this is primarily a Building Control issue, the means for mitigation will no doubt require redesign of most premises and layout of the site, which will have a material effect on the appearance thereof.
- The majority of footways within the site leading to the rear of dwellings, are inadequate, failing to comply with minimum requirements in respect of wheelchair users. As such, this development disadvantages this vulnerable user group.

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- Inadequate parking provision will result in vehicles obstructing the site's internal roads and adjoining roads.

REVIEW

Section 2 - Existing Site & Local Context

2.1.8 Water Lane provides direct access to key services in Angmering village and the wider area including local schools, convenience store, health centre and local employment centres.

2.2.10 The village of Angmering benefits from a wide range of facilities and amenities providing for nursery, primary and secondary education, food retail, employment and healthcare within an acceptable walking distance, in addition to a range of community facilities which would allow a wide range of services to be accessible locally, without the requirement for residents to travel away from Angmering by private car.

- Notably, all primary school and much of the nursery provision within the village, is situated north of Water Lane in Arundel Road, with the most likely pedestrian desire line being towards the existing public footpath, connecting Water Lane to Lansdowne Road and the foot network beyond. Accordingly, it will be necessary for all parents with children attending these schools and doing so on foot, to cross Water Lane – an acknowledged principal distributor route, with commensurate levels of traffic and at peak times. Given the statement below -

2.1.14 A number of residential properties on Water Lane benefit from access to off-street parking provision in the form of direct drives. However, despite these provisions, there are regularly vehicles parked along the westbound carriageway of Water Lane, some of which may be attributed to the sites current use and some of which may be attributed to existing residential parking demand.

- it is disappointing that no consideration appears to have been given to the provision of any pedestrian crossing facility, associated with this proposed development. The applicants make much of the site's proximity to services and their enhanced expectation of residents walking to these facilities. To encourage ad-hoc pedestrian movements between parked vehicles, with no provision assisting parents with push chairs, let alone the mobility impaired, is illogical and unsafe.

2.1.18 Observed traffic speeds on Water Lane and through the village of Angmering were not considered to be high in respect to either the posted speed limits or the visibility splays achievable from the proposed site.

2.1.19 To the east of the site Water Lane is subject to a posted speed limit of 30mph. Speeds are generally retained within this threshold. This is achieved by a combination of the calming effect resulting from some on-street parking on Water Lane and the series of traffic calming features further to the north east on Water Lane in the form of a pair of single lane / priority passing places.

- No record of the data obtained during the 'observations' is supplied. Section 2.1.19's wording

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suggests that there is at best, mixed compliance with the posted speed limits, which is confirmed by local experience. This is of major concern as speeds should be contained close to 20 mph, given the commencement of the 20 mph zone immediately southwest of the proposed site's entrance – vehicles should either be travelling at 20 mph within the zone or decelerating to that speed ready to enter it. If vehicles are still being noted at or above 30 mph (as intimated), further mitigation would seem appropriate, particularly given the raised levels of projected pedestrian activity crossing this road.

- Of similar concern, is the fact that no footpath exists along the northern side of High Street and the southern interface with the proposed development. All proposed dwellings fronting this location have their respective front access, directly abutting the roadway. This cannot be considered safe, particularly given the likelihood of vehicles parking along this frontage (currently subject of single yellow line restrictions).
- The situation is further exacerbated by the development's primary pedestrian route to the local shops and services, also entering directly onto the roadway of High Street at this location – again without any suitable access for the mobility impaired or parents with push chairs etc.
- It is notable that recent studies¹ consistently show a marked increase in the number of such users killed or seriously injured on the UK's roads. Reference is made within section 2.2.3 to NPPF Chapter 4 – Promoting Sustainable Transport - subsection (iv) *"Provide safe and suitable access to the site for all people."* **The development as proposed clearly fails in this respect.**

2.2.20 Key to this cycle accessibility is the ease of cycle access to the A259 which, for the majority of its length in this locality is supported by an adjacent cycle route on the southern side of the carriageway or quiet residential streets adjacent to the A259.

- Whilst it is acknowledged that there are widespread cycle networks within the area, previous accident studies clearly identify the roundabout junction of Station Road and the A259 as being an injury accident cluster site with a high proportion of vulnerable user involvement – including cyclists. The introduction of further vulnerable users needing to negotiate this accident cluster location, can only increase the potential for further casualties unless additional mitigation is provided. None has apparently been considered or suggested within this submission.

2.1.12 It is considered that the site is very well located in respect to access to the wider strategic road network without any significant impact on urban centres for those who need to travel by car.

- It should be noted that Angmering is a "rural" village and not an "urban centre." Accordingly, any perceived impact is likely to be more pronounced.

1 DfT: Reported Road Casualties in Great Britain: Quarterly Provisional Estimates Q2 2012

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NUMBER	ROUTE SUMMARY	TYPICAL FREQUENCY	HOURS OF OPERATION
9	SHOREHAM – WORTHING – ANGMERING – LITTLEHAMPTON	MON – SAT: HOURLY SUN: NO SERVICE	MON-FRI: 07:11-19:05 SAT: 08:14-19:08
X4	SHOREHAM – WORTHING – ANGMERING – LITTLEHAMPTON	MON – FRI: 1 PER DAY	9.30 TO SHOREHAM 13.00 TO LITTLEHAMPTON
R1, R3	SAINSBURY'S SERVICE	MON – FRI: 1 PER DAY	MON, WED, FRI: 10-10 TUE, THU: 10-26

Table 2.1 - Bus Services and Frequencies

- The report refers to “*regular services*” - this should not be confused with “frequent” services. Only one of the services available (Route 9) operates more than once a day and then only for a maximum of 12 hours, with a reduced service on Saturdays and no bus service exists on Sundays through any operator. Accordingly, all relevant journeys will need to be carried out using private transport outside these times.
- 2.3.8** Refers to the additional route 700's access as being “... *accessible within a short walking distance to the south.*” The relevant stops are located just north of Angmering railways station, some 1.5 km from the site. This is unlikely to be considered a realistic option for the elderly or parents with young children, who will most likely revert to private car usage, if available.

2.3.18 A review of the National Census data taken in 2001 in relation to Travel to Work reveals that historically there has been a relatively high level of car use when compared with Arun District or the wider south east.

- Arun's Bramley Green Residents' Survey 2004, identified then that 75.7% of residents in work, travelled outside of Arun district, apparently explaining the high level of car ownership displayed. As the most recent large scale development locally, this would seem a logical point of reference. Given the limited bus services' restricted hours of operation, there is a strong presumption in favour of private car usage in respect of any further developments within this rural location.

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Section 3 – Access, Layout and Servicing Arrangements.

- 3.1.11 The main site access is in the form of a standard bell mouth access. The typical carriageway width within the access road is set out at 4.8m to provide for the safe two-way movement of traffic together with minimum width 1.8m footway access to the site frontage and into the site.

Site Layout.

- This fails to comply with MfS¹² recommended minimum footway width of 2.0m.
 - The footway along the eastern side of Water Lane, north of the site appears to enter the site at the northern side of the proposed junction bell-mouth but then abruptly stops, leading onto a grass verge. This will necessitate pedestrians either entering the live carriageway or having to walk along the grass verge – this is inappropriate and unsafe.
- 3.1.12 The access road will be at carriageway level for the first 10m from the junction with Water Lane together with segregated pedestrian footway and will then take the form of a raised surface / shared surface providing for vehicular and pedestrian access through the site.
- No provision is made within the submitted drawings, for continuity of access for mobility impaired pedestrians on Water Lane, seeking to cross the proposed new junction bell-mouth. Dropped kerbs with suitably aligned tactile paving of the appropriate standard, should be provided retaining the direct route of pedestrian desire line, as per MfS.
- 3.1.14 Kerb radii are set at 6m which allow for the safe movement of private vehicles entering and exiting the site simultaneously. The access design also provides adequate width and radii to allow typical refuse vehicles to enter and exit the site.
- Manual for Streets³ clearly identifies such radii as being 'large' radius curves, encouraging high vehicle entry speeds. Smaller radius curves are required to mitigate this effect. This is particularly pertinent given the proximity of the shared surface element of the proposed development, if conflict between pedestrians and motor vehicles is to be avoided.
- 3.1.16 The eastern part of the site provide access for a small number of dwellings / parking spaces via a simple crossover with sufficient space provided for the safe manoeuvring of vehicles to ensure entry and exit in a forward gear.
- It is unclear from the supplied drawings, how the use of parking space 4 can be regulated to prevent the vehicle overrunning and blocking the rear footway access to premises 4-6, to the rear of the

2 Manual for Streets 2007 – p 68; Chapter 6, section 6.3.22

3 MfS 2007; p 66 Chapter 6, fig 6.3 – section 6.3.12

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indicated car barns.

- It is of additional concern that none of the front or rear access doors to premises 4 to 14 inclusive, are accessible by mobility impaired users, all of these being via steps. Whilst primarily a Building Control matter, this should be a material consideration as rectification of these shortcomings may well influence the appearance and layout of the development as proposed.

3.1.17 The site layout has been designed to retain low traffic speeds and provide adequate space and priority to allow pedestrians and cyclists to move through the site in reflection of the philosophy of Manual for Streets.

- Use of parking bay 15 will obstruct access to the primary pedestrian route from the proposed development onto High Street and attendant services. The available width for pedestrians will be reduced to approximately 0.8m. The minimum width for a wheelchair is given as 1.0m.⁴ Given the heavy use this access will experience in terms of general pedestrian movements alone, this width should be a minimum 2.0m.
- Further, it is notable that none of the rear access routes to any of the proposed dwellings, satisfy the minimum width stipulated for wheelchair users. Accordingly, this vulnerable user group is clearly disadvantaged.

3.1.20 Pedestrian visibility splays of 2m x 2m are achievable from all points of pedestrian access onto the site access roads and from the main site access points onto Water Lane and High Street.

- The quoted visibility splay is nonsensical and is presumed to be a typographical error.

Site Servicing.

3.2.4 It is demonstrated that a typical refuse vehicles is able to enter and exit the site and can safely manoeuvre through the site access in reflection of low site traffic flows and the advice contained in Manual for Streets.

- The supplied swept path analysis drawings (*RGP – Refuse Vehicle Track*) clearly demonstrate that such vehicles require access to both east and westbound traffic lanes of Water Lane, in order to enter and leave the site. It is unclear how this could be achieved when motor vehicles are parked along the opposing road side, as is currently lawful and readily acknowledged elsewhere within the report.

3.3.4 In addition to the issues raised above, the Auditors also made two general observations in relation to bus access and a suggestion to further extend footway into the shared use area.

Stage 1 Road Safety Audit and Designer's Response.

4 DfT 2005; Inclusive Mobility

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- No such observations are present within the above document as supplied with this application – clarification should be sought to confirm the integrity of the document as described.

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Section 4 - Traffic Generation and Impact.

4.1.17 The proposals would not only result in a general reduction in weekday traffic movements locally, there would also be a significant reduction in weekend traffic movements.

4.1.18 It is considered that, in traffic terms, the proposed residential use would be more sympathetic to the locality than the current use in respect to highway capacity, safety and amenity.

- Currently, vehicles access and egress the site for no more than 12 hours a day. As a residential development, vehicles would be circulating up to 24 hours a day, given the indeterminable range of hours worked by new residents. This will have a material effect on the amenity afforded existing residents.

Section 5 - Highway Safety.

5.1.7 Two of the incidents involved pedestrians. In both cases it appears the pedestrians may have stepped out onto the carriageway having failed to observe or misjudge approaching vehicles.

5.1.8 Given the circumstances described through the Sussex Police data it is apparent that there are no existing road safety issues in the vicinity of the site that would be exacerbated by the additional development traffic and the recorded accidents were very much driver error / road user error incidents which did not result from poor highway design.

- There is however, a clear road safety issue as a result of the application as proposed. The primary pedestrian access from the site onto High Street, does so directly into the live carriageway, there being no footpath (existing or proposed) along the north side of High Street at the material location. This clearly increases the potential for conflict between pedestrians and road users at this location.

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Section 6 – Parking Provision.

- 6.1.2 The Census data attached at **Appendix D** states approximately 15% of households do not own a car or van, 45% of households own one car or van with 40% households owning two or more vehicles.
- 6.1.3 The 2001 Census data for local car ownership equates to an average car ownership in the region of 1.4 vehicles per dwelling throughout the Ward however, it is acknowledged that car ownership levels would have fluctuated between 2001 and present day.
- 6.1.5 The proposed layout provides a total of 42 car parking spaces within the development inclusive of private, allocated car barns and parking spaces for the use of residents of the site.
- 6.1.6 This relates to a rate of approximately 1.9 spaces per dwelling, which would reflect the local levels of car ownership inclusive of anticipated changes in levels of car ownership.
- The Bramley Green Residents' Survey⁵ identified that, within this latest large scale development, vehicle ownership at 1.8 per household was 30% higher than that for the rest of Angmering ward (quoted in that document as 1.3 per household and citing the same source). As this more representative determination of usage, showed vehicle ownership at 1.8 per household in 2004, allocating an allowance of 1.9 per household nine years later (itself acknowledged within the report as being below the level suggested by the West Sussex Parking Demand Calculator), is clearly inappropriate and inadequate. This will lead to this site's roads and those around the site, becoming clogged with vehicles unable to be accommodated within the proposed development. **As proposed, this element of the application is unsustainable.**

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FLOOD RISK ASSESSMENT

1. As a detailed application, the following are still to be conducted:-

- Sequential Test procedure (Page 2) 1.3
- Soil soakage tests
- Site-specific soil investigation measuring groundwater depths
- Soil infiltration rate
- Surface water drainage design
- Confirmation of the Chalk and Heads infiltration rate

Existing Site & Current Flood Conditions

2. Paragraph 2.1: This contains incorrect information – The unnamed brook is “The Black Ditch” which is an ancient main river tributary off the River Arun and is fed in its upper reaches by run-off from the South Downs to the north of the site.
3. Paragraphs 2.2 – 2.16: The report acknowledges that the site is prone to flooding and is within Flood Zone 3 (FZ3). Correspondence (not included) from the Environment Agency (EA) states that the site is liable to flood in the critical 1 in 75 years storm event, which places it at a slightly higher risk than FZ3. The entire village is within the medium to high Groundwater Emergence Zone risk. This is also acknowledged in the ADC Strategic Flood Risk Assessment (SFRA) dated February 2008 which also acknowledges that the culvert section of the Black Ditch causes a restriction in the fluvial flow. The culvert runs parallel to this site.
4. The topographical survey and site investigation report (Appendix B) was conducted over five years ago on 26th September 2007. It does not reflect the current situation and the impact of the flooding to that area of the village since then. The site is close to the High Street which is a hill and the buildings above the site show that the ground had to be levelled before the current premises were built. This meant that the “Head” was removed to expose the chalk strata beneath.
5. The British Geological Survey Map No 317 indicates that the site geology consists of Head over Chalk.
Site Investigation Report 27th September 2007 at 6.1.2 (Page 2) states *“Chalk is slightly soluble in water and, while it has excellent bearing properties when un-weathered, this solubility leads to deep weathering and softening, producing some undesirable characteristics, as far as a building construction is concerned.”*
6. Southern Water records show that there are no surface water sewers in the area. If this is the case then the drainage design and materials should be of a quality to counteract any possibility of “softening” brought on by natural infiltration or direct infiltration through permeable materials and vents.

Proposed Scheme Design & Flood Risk Mitigation:

7. This is a site that will require an “Exception Test” to be conducted and passed as it is within the flood zone – FZ3+ as stated in the National Planning Policy Framework Technical Guidance Document.

Floodplain Volume:

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8. The table shows that the majority of the proposed development will be within the floodplain area.
9. It is proposed that the lowest finished floor level be set at 0.3m higher than the 1% plus climate change level. Appendix F 4595/101 raised external areas and routes to safety, shows that entrance/exit to each property will be via a staircase to the floor/ground level. What is not shown is any consideration for the disabled with wheelchairs and mobility scooters, nor is there any indication that a footpath will be constructed along that side of the High Street which abuts the proposed properties.
10. It is proposed that each residence is fitted with a deep aperture to allow ingress/egress of flood waters which will not impede the flow of the flood water. It has to be assumed that this flow of water will eventually infiltrate naturally. Not quite sure what is meant here as the report also mentions *"a floodable void under each unit within the floodplain,"* are we talking about some form of storage tank that will gradually allow the water to infiltrate.

Surface Water Drainage Strategy:

11. It is evident that with normal surface water and floodwater, the drainage system has to be designed to cope with both events together with an additional storm occurring within 24 hours of the last. It is proposed that two cellular soakaways are constructed for surface water run-off to either a storage tank below ground or allowing it to infiltrate naturally.
12. The report is aware of the NPPF requirements that a new development should not increase flood risk of neighbouring properties – this site is within FRZ3 and very prone to flooding, so the surface/flood water drainage system should be so designed not to rely totally on infiltration especially as the area is in a groundwater emergence zone.

Summary:

13. This report recognises the problems of flooding with this site and has shown the need to raise dwellings above the known flood water levels, however, the drainage of surface water and floodwater is very dependent on the design used which cannot as yet be completed until further tests are conducted as described bulleted above. The Site Investigation Report dated 26th September 2007 reference J9299 is now 5 years out of date and cannot be considered as reliable in view of the adverse weather conditions since that date. Reliance is also placed on the ADC SFRA which is also 5 years out of date having been published in February 2008. In 2012 Angmering endured excessive rainfall one flooding and two months at the end of the year of very near flooding. In view of this a complete site survey including a soil contamination test of chemicals used on the site should be conducted.
14. It is to be applauded that the design of the residences takes into consideration the need to raise the floor level above the known flood level; however, will new residents appreciate that their "barned" cars will not be afforded such consideration.
15. There is no assessment of proposed foul drainage within and from the site except a map at annex E showing Southern Waters sewer locations within the area.

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GEOTECHNICAL AND CONTAMINATION (PHASE I AND II) ASSESSMENT REPORT

1. **Section 1:** confirms *"Ashdown Site Investigation Limited was commissioned to carry out a ground investigation and combined geotechnical and contamination assessment of the site" . . . "The instruction to proceed was received on behalf of the client, Chandlers Garage Worthing Ltd., in an email dated 20 August 2012."*
2. The report preface confirms that the Factual report, Phase 1 & 2 Contamination Assessments, and Geotechnical report were prepared and signed off in October 2012.
3. It also caveats that *"The possibility of a variation in ground and groundwater conditions away from the positions investigated should not be overlooked. Groundwater conditions can vary both seasonally and due to other effects."*
4. *"If significant risks to construction workers are identified by the preliminary assessment attention is drawn to this. No assessment of risk from acute exposure has been undertaken in this connection."*

General Observation:

5. The report format appears fragmented, with facts and findings on the subject matter; specifically on groundwater; spread throughout the report making it difficult to reconcile. Soakaways and surface water flooding are particular areas of interest due to the site's *"high susceptibility to groundwater flooding"*.

PHASE 1 CONTAMINATION ASSESSMENT (DESK STUDY)

6. **Para 2.1:** says that *"At the time of the walkover survey the site comprised a generally level agricultural field that had recently been ploughed."* And concludes that: *"No significant sources of contamination were identified either on or off site by the walkover survey."*
7. **Para 2.1.1** concludes that *"No significant sources of contamination were identified either on or off site by the walkover survey."*

Geological Data Review

8. **Section 2.2** states that *"The White Chalk Subgroup (New Pit Formation) comprises a weak, white chalk locally with flint bands together with scattered nodular flints." . . . "The presence of cavities in the chalk is very rare and solution features, if present, can be expected to be in filled with Quaternary deposits such as the River Terrace Deposits." . . . "The infill material may be significantly weaker than the surrounding chalk. Solution features can comprise pipes extending to several metres deep into the chalk or conical depressions and basin shaped structures."*

Ground Stability & Geological Features

9. **Table 2. Faults & Radon Affected Areas:** Findings confirm:
 - **A Fault:** *"located some 296m to the south . . . "is not likely to pose a risk to the site."*
 - **Radon:** No specific risk from Radon is considered to be present, however, the report recommends *"that discussions with building control are undertaken in connection with any requirements they may have."*

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10. The report confirms that there are: *"No significant risks from mining activities, natural cavities or extractions are reported influencing the site"* and concludes: *"The maximum hazard rating of natural subsidence within the site boundary (including a 50m buffer zone) is low."*
11. **Table 3. Ground Workings:** identifies *"a railway line to the south as running within a cutting"*, but concludes *"historical [railway] ground workings are not considered to pose a significant risk to the site"*

Background Soil Chemistry

12. **Table 5. Background Mean Soil Concentrations of Metals:** shows that *"The mean soil concentration [of metals] indicated are not considered to be significantly elevated for the proposed use."*
13. **Para 2.2.4** confirms *"No significant sources of contamination were identified either on or off site by the geological data review."*

Environmental Data Review

14. **Section 2.3** explains the approach adopted. *"Records of potentially contaminative activities, authorisations, pollution incidents and land uses recorded by the regulatory authorities and compiled by Groundsure in their EnviroInsight Report have been reviewed."*
15. It concludes that *"No significant risks from landfills or other waste sites are identified by the data. No recorded environmentally sensitive sites have been identified in the immediate vicinity of the site."* And that *"No significant sources of contamination were identified either on or off site by the environmental data review."*

Hydrogeology and Hydrology

16. **Para 2.4.1** confirms that *"The White Chalk Formation expected beneath the site is classified as a Principal Aquifer."*
17. **Para 2.4.2** says *"Five groundwater abstraction licences are recorded between 315m and 1054m of the site. All refer to abstractions used for irrigation (horticulture and farming) in the surrounding nurseries and farms."*

Basic Flood Risk Assessment

18. **Para 2.4.5** advises that: *The British Geological Survey reports a high susceptibility to groundwater flooding within 50m of the site. The BGS consider the confidence rating of their data in this area to be high. Whilst the site is not within a designated flood zone, given the high susceptibility to groundwater flooding at the site that has been identified by the BGS, it is initially recommended that discussions are held with the local authority and Environment Agency to ascertain the historical occurrence of groundwater flooding at the site."*

Conclusion:

19. The environmental assessment confirms that there are no contamination issues, but that the site has a *"high susceptibility to groundwater flooding."*
20. The Parish Council defers to the ADC "Subject Matter Expert" as to whether contamination testing carried out has been exhaustive, and is complete, and fully supports any recommendations that they may make.

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FACTUAL REPORT

Ground Investigation

21. **Para 3.1.1** *"The ground investigation comprised the excavation of a series of cable percussion boreholes together with a number of hand auger boreholes and hand dug trial pits. The fieldwork was carried out between 22nd August and 3rd September 2012."*
22. **Para 3.1.2** confirms that *"The results from the ground investigation, together with the findings of the phase 1 contamination assessment, are considered adequate to allow the preparation of a quantitative risk assessment for the site."*

Soakage Testing

23. **Para 3.1.5** explains that: *"Falling head soakage testing was carried out in the cable percussion boreholes within the underlying Chalk deposits ", and that "The tests were carried out in general accordance with The Soakaway Design Guide published by Kent County Council (2000)."*
24. **Para 3.3.2** confirms that *"Groundwater stood at depths of 2.4m, 4.1m and 3.1m below ground level on completion of borehole BH1, BH2 and BH3, respectively. All levels were taken after removing the borehole casing."*

Conclusion:

25. Groundwater levels were tested over a period of only 2 weeks, which we believe will return unrepresentative results.
26. Arun should request that additional testing be undertaken over a longer timeframe during the winter months before determining this application.

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GEOTECHNICAL ASSESSMENT

Foundations

27. Whilst this report has been prepared to provide advice to assist designers in undertaking detailed design, the report itself does not represent a detailed design statement." And makes a number of recommendations
28. This section makes a number of recommendations. Including, that *"a detailed arboricultural survey should be undertaken for the site."*

Groundwater

29. Para 4.2 confirms that *"Standing water levels were recorded between 2.4m and 4.1m depth on completion of drilling."*

Stability of Excavations

30. Para 4.3 then goes on to warn that: *"All excavations within the River Terrace Deposits must be assumed to be subject to short term instability. Excavations below the water table are likely to be problematic without positive groundwater control as discussed above"*

Drainage

31. Para 4.7 concludes that *" In view of the fact that no significant soakage was recorded at two of the test positions, suggesting no suitable fissures were present in the test zones, it is important that tests should be carried out at the locations of any proposed soakaways to confirm that suitable soakage can be obtained."*

Conclusion:

32. The assessment provides recommendations but no reference to having identified solutions to surface water management measures. This is unacceptable as the proposed design and layout of the site land it is clearly defined.
33. The NPPF requires that *"The drainage strategy should demonstrate the surface water run-off generated up to and including the 1:100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event."*
34. The applicant must therefore demonstrate that the proposed drainage arrangements will satisfactorily manage the flood risk over the development lifetime and will not increase flood risk to others.
35. in the Parish Council's opinion, this document DOES NOT fulfill this requirement
36. There are no infiltration run-off tests or attendant calculations to support the assumption that soakaways will deal with this.
37. We believe that there are significant gaps in the technical information bearing in mind that this is a known groundwater emergence site and application is for FULL PLANNING CONSENT

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PHASE 2 - CONTAMINATION ASSESSMENT

38. Para 5.1 says *"The phase 1 contamination risk assessment for the site did not identify any potentially significant sources of contamination."*, and concludes *"It is noted that no visual or olfactory evidence of contamination was recorded at any position investigated."*

Inorganic Contamination

39. Para 5.2.1 says a further more detailed assessment was carried out for inorganic contaminants *"are below the commercial soil screening values (SSVs). It is also noted that the results are all well below the more stringent SSVs applicable for a residential setting, including plant uptake."*
40. Para 5.2.2.1. None of samples tested recorded any **Polycyclic Aromatic Hydrocarbons (PAH)** compounds above the detection limit of the test (0.5mg/kg). All the 95% UCLs are below the PAH Soil Screening Values (SSVs.)
41. Para 5.2.2.2 *"No concentrations [of Pesticides] above the 10µg/kg detection limit of the test were recorded in any of the samples."*
42. Para 5.4.3 warns that *"Maximum concentrations of the phytotoxic elements copper, zinc and boron of 19mg/kg, 96mg/kg and 0.8mg/kg, respectively, were recorded within the samples tested. Whilst these concentrations are not considered to pose a risk to general planting, a horticulturist should be consulted with regard to any specific planting schemes proposed."*

Conclusion:

43. The findings of the **Contamination (Phase 1 & 2)** reports conclude that are that that no significant geological or ground contamination issues have been identified in relation to this site and its proposed use.

The proposal by ASDA, further to the east of the site, to discharge to the Ferring Rife was objected to quite strongly by the local residents and conservationist. ASDA were advised by Arun District Council to consider alternate means of discharge, which they did to a local sewer system.

44. Policy DM 41 of the emerging Local Plan requires *"A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall;"*
45. ADC need to confirm that the Environment Agency have read this document and the accompanying **Stage 1 -Flood Risk Assessment** in parallel to ensure that there are no gaps or assumptions made in regard to meeting planning guidelines in regard to providing the relevant information flood risk.
46. The Parish Council therefore defers to the expertise of the Environment Agency as to whether this testing has been exhaustive, and is complete (we strongly suspect not!) and fully supports any additional testing or subsequent recommendations that they may make.

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EXTENDED PHASE 1 HABITAT Survey & Internal and External Bat Surveys

Ecological Survey

1. **Para 1.1** informs that *"PIC Consultancy Ltd (PIC) was commissioned by Marshall Clark to undertake an ecological appraisal, at Chandlers BMW, Angmering West Sussex. The assessment included an extended Phase 1 habitat survey as well as an internal and external bat survey." ... plus ... "ecological surveys in and around the site, which aims specifically to assess the sites potential to support protected species and habitats."*
2. **Para 1.4 & Para 1.5** describe the site as: *"situated within the village of Angmering... on Water Lane in the centre of the village, just north of the High Street. The immediate surroundings consist of mainly residential properties and small shops with agricultural pockets of woodland beyond the village boundary. The site is currently a BMW car dealership, with showroom, forecourt and vehicle workshops. A disused cottage is also present on site." ... "The proposed development of the site is for the demolition of the existing buildings and the erection of a number residential properties"*
3. **Para 1.1.2** explains that *"The development site comes under the jurisdiction of Arun District Council. The Arun District Local Plan 2013-2028 is in production, so development in Arun District is currently subject to policies of the Draft Local Plan 2012."*
4. **Para 2.2** describes the site inspection as *"... an extended Phase 1 habitat survey, which included assessing the site for the potential for badgers, reptiles, and other protected species on 4th September 2012. The surveyors identified the habitats present, following the standard 'Phase 1 habitat survey' auditing method developed by the Nature Conservancy Council (NCC). The site was surveyed on foot and the existing habitats and land uses were recorded on a map. In addition, the dominant plant species in each habitat were recorded, as was any evidence of protected species and the habitat suitability for reptiles. The potential for the site to support protected species was also assessed"*
5. It was carried out on the same day as the ecological inspection of the proposed site of the new Chandlers BMW garage, subject to planning application A/130/12.
6. We suspect that the lack of a detailed survey was due to the assumed poor Ecological Value of the Site, which the report assesses in **Paras 4.1 & 4.2** as follows:

"The site largely consists of hard standing and commercial buildings. There is one residential dwelling on site with a small garden, which contains small areas of semi-improved grassland, scrub, a hedgerow, and some trees. There are also areas of road verge amenity grassland on the edge of the site. "

"It is considered that the potential re development of the site is not constrained by ecological issues. The site does not support protected species or habitats. The proposed re development would not have an effect on the sites nature conservation

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value or that in the local area. Indeed it is considered that with enhancements to the proposed development, the ecological value of the site, post development, may well be higher than current."

7. **Para 5.1** concludes that *"The habitats found on site are common and widespread throughout the UK and are considered to be of limited ecological value at a site level only. The site mainly consists of hard standing, which greatly reduces the likelihood of supporting protected species due to the reduction in foraging habitat and safe refuge from predators. The site is not thought to be constrained by any protected species."*
8. Performing an ecological assessment across 2 sites on a single day – 4th September 2013, time and duration unknown – is not the norm and in our view can not be considered as thorough or complete in its findings.

Habitat

9. **Para 3.3** states that *"The site consists of semi-improved grassland, amenity grassland, scrub, large areas of hard standing and five buildings. The habitats on site are widespread and common throughout the UK and do not include any UK BAP habitats."*
10. **Paras 3.4 and 3.5** inform that *"The small area of semi-improved grassland was found within the garden on site and looked as though it has recently been cut with evidence across the whole area of former scrub areas being cleared." ... and that ... "areas of amenity grassland on site were roadside verges cut very short and well maintained"*.

Tree Assessment for Bats

11. **Para 3.8** concludes. *"There were no mature trees on site thought to have potential for roosting bats. There were no trees on site which exhibited the features associated with roosting bats such as rot holes, deep cracks or fissures in bark or dense ivy cover."*
12. **Para 3.9** goes on to explain that: *"Bats are likely to use the hedgerows on site and in the local area for foraging and commuting. Bats are known to use linear features such as hedgerows and tree lines for commuting between roosting sites and foraging habitats. However, it must be noted that the hedgerow and associated scrub features were narrow features only, and did not present significant areas for foraging."*

Internal and External Bat Surveys

13. **Paras 2.5 & 2.6** inform that *"Internal and external bat surveys were undertaken on 4th August 2012" and that "The surveyors undertook an internal and external examination of the building including all accessible roof voids." ... "The cottage surveyed, was accessed during the day. An external investigation assessed the tiles and structural timber joints of the building. This was undertaken in order to see if there were access points readily available for bats to utilise or crevices that bats could be roosting in"*

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14. Para 5.2 concludes that *"The cottage onsite was the only building thought to have potential for roosting bats as it exhibits a tiled roof with lifted and missing tiles in places giving potential access point for bats into the roof void. On inspection of the internal voids no evidence of bat activity was found. The site is thought to be under no constraints from bats."*
15. No actual bat monitoring survey was undertaken.
16. The report indicates in Para 2.5 that only *"accessible roof voids"* in the disused cottage onsite were examined.
17. Bat activity is common in Angmering. Therefore, the only way to eliminate or confirm bat usage of the site is to perform monitoring and recording of actual bat foraging and flight paths activity over a period of time.

Birds

18. Para 3.16 states that *"Birds are likely to use the trees and hedgerows found on the boundaries of the cottage site for foraging and breeding"*
19. No monitoring or recording of bird species seen using the site was undertaken.

Proposed Ecological enhancements

20. Para 5.3 states that *"Enhancements for the site have been recommended which includes adding features such as bat and bird boxes into newly established gardens. The use of native species in planting schemes is considered to be the most significant in terms of creating new habitats within the site."*
21. We are unclear how this will be achieved, as there has been no survey undertaken to identify species of bat that may use the site. The same applies to provision of bird boxes, as the report provides no indication of which birds currently frequent the site?

Conclusion:

22. This appears to have been a box ticking exercise. The habitat survey was undertaken on just 1 day, at a time of the year when flora will have been at its least abundant.
23. Our view on the unsuitability of this assessment to support full planning application is supported by the statement made in Para 2.8 which says *"The protected species assessment provides a preliminary view of the likelihood of protected species occurring on site, based on the suitability of the habitat and any direct evidence onsite. It should not be taken as providing a full and definitive survey of any protected species group."*
24. Apart from flora, no monitoring or recording of other species was carried out. Surely, the requirement of this report for full planning approval purposes is to provide expert advice and evidence on the presence (or not) of protected species.
25. It is the Parish council's view that this Ecological Survey is incomplete and does not comply with Local and National Policies.

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26. It is our recommendation that before this application is determined, that the applicant be requested to commission a more robust survey to confirm the presence and/or use of this site by protected species.