

From: Anita Gardner
Sent: 11 June 2018 12:26
To: Planning.Responses
Subject: FW: Planning Response: A/36/18/OUT (Gladman Homes)

Please treat as a PC rep

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Save the environment - think before you print.

From: [REDACTED]
Sent: 11 June 2018 12:21
To: Anita Gardner
Cc: Planning; Planning.Responses; Rob Martin; Angmering Parish Council
Subject: Planning Response: A/36/18/OUT (Gladman Homes)

Hi Anita

Planning Response: A/36/18/OUT (Gladman Homes)

We have entered our **objection** via ADCs website; but were unable to submit our comments due to that website's restriction on the number of characters allowed.

Hence, I am submitting our comments directly to yourself and copying in ADCs generic Planning email boxes.

I would be grateful if you would please marry our comments to our response.

Thanks & regards

David

David Hussey
Assistant Clerk to Angmering Parish Council

Planning Application A/36/18/OUT

Land West of Arundel Road, Angmering

Angmering Parish Council's Response to this application is as follows:-

EXECUTIVE SUMMARY

Angmering Parish Council **OBJECTS** to this application because:-

- The application is speculative with Gladman Homes '**gaming the system**' by trying to squeeze an otherwise unsatisfactory application through before the emerging Local Plan is finalised.
- The joint ADC/APC project to create a **Sports Hub** on this site, not just for Angmering, but also to fulfil the Arun DC Sports and Open Space Plan, is severely compromised.
- The only basis for putting this forward now is to claim there is **no 5-year housing supply** until the Local Plan is adopted.
- This site has **not** been determined as a **strategic allocation** within Angmering, so is not supported by the Sustainability Assessment or Flood Risk Assessments that were done for the new Plan.
- The application is outside **Built-Up Area Boundaries** defined by the Angmering Neighbourhood Plan and the emerging Local Plan.
- Although the site is completely within a Flood Zone 1, this does not answer questions about **Flood Risk to Others**, particularly the Recreation Ground to the south which already floods annually. No Strategic Flood Risk Assessment has been carried out for this site.
- The **Sewerage system** is not adequate to accommodate this site.
- **Community Involvement** has to date been virtually invisible with no real consultation happening before this point. There has been no attendance at the **Angmering Advisory Group**.
- The **highway access is dangerous** as it emerges on Arundel Road at a point where the speed limit is 60mph.
- There is a **loss of employment** on this site, which the application calls 'low quality' and then ignores. This is an important principle both for the Neighbourhood Plan and the emerging Local Plan.
- There is a **conflict** between the **application** form, which quotes the provision of a Football Pitch, and the **Planning Statement** detail which talks about the land for a football pitch. There is a considerable difference between the two. This is a sop to the intention to expand sports facilities here, as above.
- The football pitch as shown, is **incorrectly aligned** and is unusable because there is **no extra car parking**, not enough **land around the pitch** and appears to be a pitch for the development rather than integrated with the Recreation Ground.
- In addition, there is no provision for improving the **changing facilities**, or for improving the **drainage** of existing pitches, which are both **essential**.

Introduction

- 1) The **Planning Statement** is typical of the approach from Gladman Homes in this application, whereby it contains a menacing and slightly aggressive approach to the whole project.
- 2) Once again, there is little detail included with all matters reserved except for access, but there is enough information in the application to be able to determine what the likely outcomes would be, were permission to be granted.
- 3) The developer is maintaining that the emerging Local Plan can be given no weight, despite the fact that this application will not be determined until after the Planning Inspector's advice is built into it. This should be challenged, as the entire application revolves around this stance, and it is apparent that Gladman Homes are '**gaming the system**'. Any comparison with the emerging Plan would result in outright **Rejection** for this proposal.
- 4) Before considering the details in the application, a number of background matters should be considered.
 - Gladman Homes are putting in a speculative application because it has been apparent to all, including the landowner and developer, that most of this land has been earmarked for development as a Community Sports Hub.
 - Angmering Recreation Ground (ARG) adjoins the site in question to the south and the freehold of this is with Arun District Council. The building that provides a pavilion and changing facilities on the ARG was installed more than 30 years ago and there is lease with the Parish Council for that building which is about to expire and an agreement for the rest of the Recreation Ground for it to be used for organised sports and as an Open Space. The Parish Council has a mirror set of agreements with the Angmering Sports and Recreation Association (ASRA) which runs the operation of the Pavilion and Sports on a day-to-day basis.
 - In 2012 representatives from Angmering Community Land Trust (ACLT) presented a proposal to acquire and use the land now subject to this application, together with the ARG owned by ADC which suggested a way in which the football pitches and other sports facilities could be expanded alongside a development of around 100 dwellings, a good proportion of which would be 'affordable', some even as Council houses.
 - Following this, the District, in the first version of the Local Plan required that two football pitches were provided as part of the Roundstone Lane developments which resulted in Section 106 agreements providing nearly £1m of funding for 2 new pitches **on the Palmer Road sites**. The cost was to include the land, the pitch provision, new changing facilities and car parking. The only place big enough to do this, in addition to what was there already, was on the land now proposed for development. The chance was not taken by ADC however and now the landowner wants property value for the land.
 - In addition, the ADC Playing Pitch & Outdoor Sports Strategy (August 2016), identified a lack of quality playing pitches (football, cricket and rugby) and 3G facilities in the east of the district. This report is mentioned in Policy OSR DM1 of the emerging Local Plan and is part of the evidence base as a Primary Source document. The proposed expanded Sports Hub would have contributed to the aims of this policy.
 - The area being proposed for development is not within the strategic development areas of either the original draft local plan or that being considered at the moment. The consultation stage of the emerging Local Plan has been going on for a long time, involving inspection and re-inspection. At no time was this site promoted for development.

Detailed Points

Non-Strategic

- 5) The site is **not** part of the **strategic** allocation within Angmering. The strategic allocation was

designed to provide the development needed in the Angmering area alongside appropriate infrastructure as laid down in the emerging Local Plan. A sizeable development here is not accommodated within the **Sustainability Appraisal** which forms an important measure of what an area can accommodate. In short, the sustainability of the site in question cannot be taken for granted.

Built-up Area Boundary

- 6) The site is not in accordance with the Angmering Neighbourhood Plan because it is outside the line of the Built-up Area Boundary (BUAB). Although application number A/131/16/OUT giving permission for 9 homes on adjoining land is referenced as evidence against this being a usable policy, this was against the background of ADC not having a 5-year land supply – making the Neighbourhood Plan policies for housing out of date. The emerging Local Plan will have a 5-year supply and the BUAB it contains will not include this land. The effect of allowing the application would completely change the outlook of this part of the village with the Recreation Ground surrounded by housing on three sides. The protection of green space outside the BUAB is **crucial**.

Flooding

- 7) There is the statement that the site is in a flood zone 1 and that there will be no flooding on the site; however, it is only 25m from flood zone 3. The filtration on the site is poor, evidenced by the developer's flooding report, and there will therefore need to be a large Sustainable Drainage (SuD) basin built, with some parts of the site needing to pump into it. The concept that the hard landscaping of this site not increasing the flooding on the Recreation Ground is not accepted.
- 8) The Recreation Ground currently has a problem with flooding, making the pitches unusable for a good part of some winters. Any increase in flooding on the pitches will be disastrous and the opposite of what the Parish Council is trying to achieve with its ongoing maintenance programme.
- 9) If this site had been included as part of a strategic allocation in the emerging Local Plan, it would have had a Strategic Flood Assessment conducted on it; however, this has not been done. There are potential flooding issues within the Black Ditch, which is already at capacity in some places. Whatever SUDs are put in place, there would be a real possibility of an increase in **Flood Risk to Others**, and it would therefore not be compliant with the NPPF.

Sewerage

- 10) Southern Water have come to the conclusion that the sewerage system in Arundel Road is inadequate for this project, making a statement in its letter dated 4 October 2017, as follows:

'There is currently inadequate capacity within the foul sewerage network to accommodate a foul flow for the above development at manhole reference TQ06057101. The proposed development would increase flows to the public sewerage system, and existing properties and land may be subject to a greater risk of flooding as a result. Additional off-site sewers, or improvements to existing sewers, will be required to provide sufficient capacity to service the development.'

Followed by:

'Unfortunately, it may be several years before adequate infrastructure is provided via a prioritised capital expenditure programme. Therefore, this proposed development would be considered premature until such time adequate sewage infrastructure could be provided'

- 11) The developers response was to employ 'Utility Law Solutions' to request a 'Feasibility Study' of what would be required, but insisting that it is Southern Water's responsibility to ensure the work is done in time. All this, in addition to the other Strategic development in Angmering is unlikely to happen.
- 12) This is the problem with having substantial developments put forward which are not part of the Strategic Allocation and therefore subject to a **Sustainability Appraisal**. This is clearly a reason for not agreeing this application at this time.

Community Involvement

- 13) The **Statement of Community Involvement** contains all that is needed to understand the approach of Gladman Homes. There was one small leaflet drop near to the site, with the first version of the plan, which contained the statement that people could respond by email. This excludes hundreds of people that do not use the internet, and numerous other residents in the village.
- 14) The three District Councillors were contacted by letter, but Angmering Parish Council was not contacted. By rooting around, the Parish Clerk was eventually able to locate the planning consultant whose response, when asked why there had been no initial contact, said that 'Gladmans are not used to Parishes wanting anything to do with them.'
- 15) Not surprisingly, there were just 9 email responses from those in that part of the village. There are 8,500 other residents in Angmering who were not consulted. Contrary to the statement made, none of the comments, have made any difference to the plans, in respect of highways or anything else.
- 16) The meeting with the parish council representatives was not as portrayed, because it was made clear to the Gladman's representative that we wanted the Sports Hub Plan to be built complete. At that meeting the current plan with the one sports pitch was produced.
- 17) **There has been no public exhibition of the revised plan at all.**
- 18) This is another example of Glamans trying to do the minimum consultation and then ignoring the outcome of it.

Open Space and Landscaping

- 19) The need for the expansion of Public Open Space (POS) in the village is now greater than before. Open Space provided within housing estates serves little or no value to the current populations, but the closing in of the Recreation Ground and the closeness of the site to existing footpaths will lose the rural feel of this area.
- 20) There is little doubt that this site will be visible from the South Downs National Park (SDNP), and the appropriate Planning Authority's view on the application should therefore be sought. The SDNP Authority also has policies relating to **light pollution** within the setting of the Park which will be compromised here.

Transport & Highways

- 21) The provision of infrastructure to support developments is **crucially** important. By avoiding the scrutiny of the Local Plan process and the proposal not being promoted until after the Inspection, the hope is that this application will not have to provide anything towards the wider infrastructure needs. The Transport Assessment conducted for the local plan is already hopelessly out of date without the addition of further unplanned housing.
- 22) Arundel Road is already chaos with both primary schools causing a traffic log-jam twice a day and which has a number of minor accidents already. Two further accesses on this road, servicing 200 dwellings is likely to cause a significant additional problem. It must be remembered that the road is the only direct access to the A27 from the village. The Traffic

Audit identified a number of concerns about this including the fact that the main access is in the 60mph zone, which the parish council has always been told cannot be changed to a lower limit because there is a need for vehicles to slow down.

Employment Land

- 23) Part of the site is currently a small trading estate employing a good number of staff. The application disparagingly calls these jobs **low quality employment** and then dismisses the loss completely. Nothing in the way of mitigation is offered for those people that are due to lose their livelihoods, they have already been given three years notice to vacate the site. This is pure arrogance on the part of the developers whose only aim is to maximise profit. Angmering Parish Council has frequently lobbied for alternative employment sites to be provided within the Local Plan, with little success. Without proper mitigation this application meets the needs of no part of the employment part of the Development Plan.

On-Site Football Pitch

- 24) There is a **conflict** between the **application** form, which quotes the provision of a Football Pitch, and the **Planning Statement** detail which talks about the land for a football pitch. The standard of football being aspired to by Angmering FC will require more room around the outside for supporters and the ability to construct manager 'dug-outs' to one side. It will also require the pitch to be on an East-West alignment and be level and drained properly. Merely providing the land will not achieve these.
- 25) There is also the question of whether the residents of the site will want a pitch as close as that being proposed.
- 26) There is no provision for **extra car parking**. There is already a weekly problem with parking in Decoy Drive and Palmer Road by Recreation Ground users.
- 27) In addition, there is no provision for improving the **changing facilities**, or for improving the **drainage** of existing pitches, which are both **essential**.

Other

- 28) The reference to the permission granted for application number A/131/16/OUT is very predictable because, despite the Judicial Review challenge by Angmering Parish Council being lost, a number of useful things came out of it. One of the Parish Council objections to this application was that it would set a precedent for the current site increasing the landowner's expectations from 'sports field' to 'housing' prices. This is exactly what has happened.
- 29) In the review of the Angmering Neighbourhood Plan, it is quite possible that there will be a proposal to develop this site for mixed use and, as it is not Strategic, time should pass before anything is considered here to allow that Plan to be put together.
- 30) One of the things that was learnt from the Judicial Review was that any objection on policy grounds had to be backed up with reasons why that policy was relevant to the matter in question. **This development is the wrong development in the wrong place at the wrong time.**