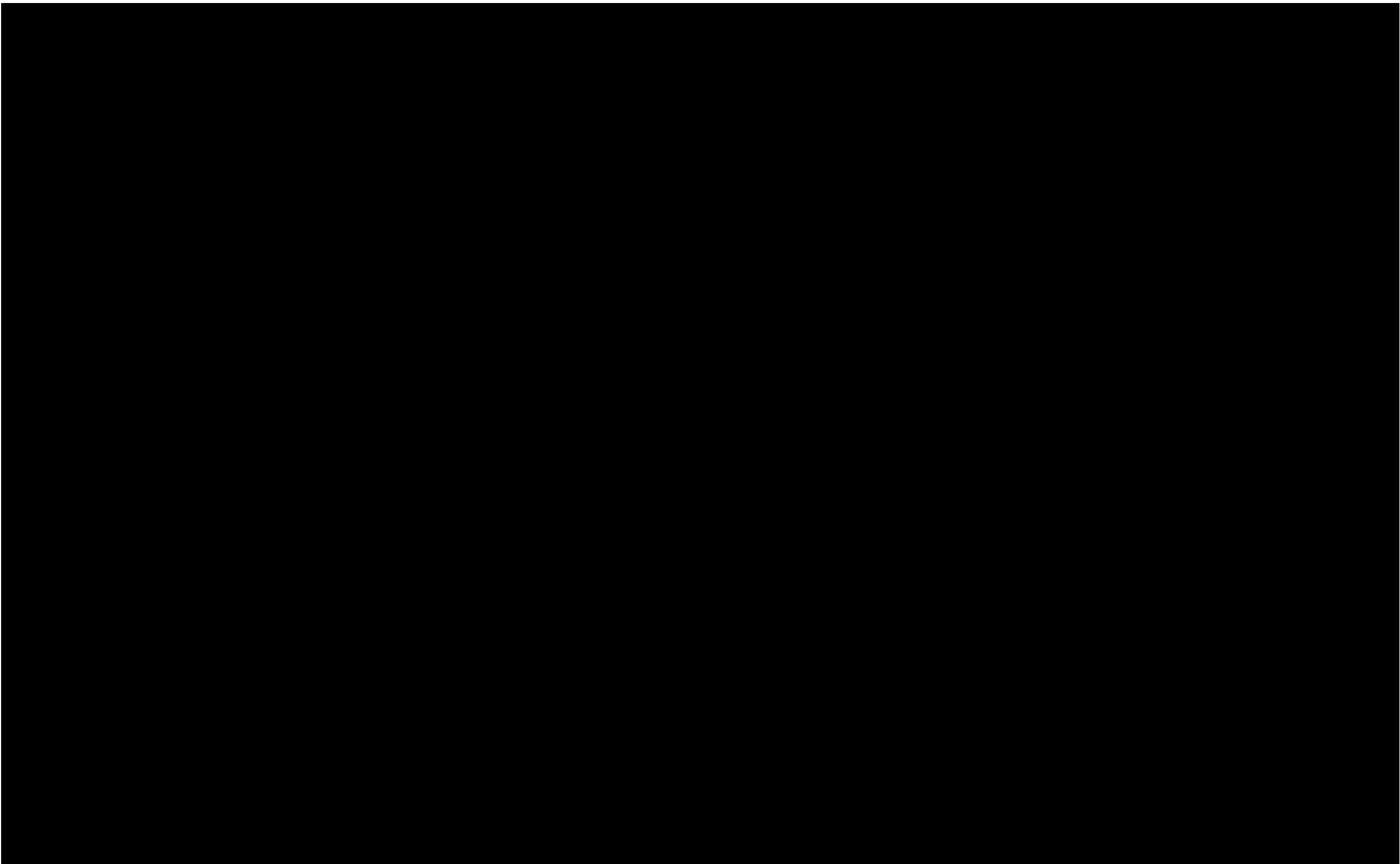




From: [REDACTED]
Sent: 25 April 2018 16:13
To: Planning
Cc: [REDACTED] Cllr. Paul Bicknell; Cllr. Andy Cooper; Cllr. Dudley Wensley
Subject: A/38/18/RES Manor Nursery, Angmering

Dear Sirs,

Please find attached Objection to planning application
A/38/18/RES Manor Nursery, Angmering.

For and on Behalf of
Save Angmering Village

R McDonald
6 Ashmore Avenue
Angmering BN16 4GG

Whilst accepting the principal of development on the Manor Nursery site, SAV strongly **OBJECTS** to elements of this application. Specifically, in respect of the proposed main access route to the development via the High Street. The issues highlighted below have already been noted in the previous application A/51/14/OUT for this site, but in our view, have been ignored by the developer.

Arboreal buffer:

Regardless of the status of the Arun Local Plan, there is a statutory obligation to protect the setting of the SDNP. There is no indication that any effort has been made in the site lay-out to lessen the impact of this development on the national park by ensuring a sufficient landscape buffer or including trees in the design layout.

Many houses on this site are of the 2 1/2 story type; double the height of the original greenhouses; therefore, the removal or pruning of existing trees would be counterproductive in shielding the site from the SDNP.

Preserving the setting of the SDNP is a requirement which the Government Inspector reinforced in his examination of ADC's revised Local Plan, as did the SDNPA. Any planting should provide a substantial screening of the development from the national park.

SDNP Dark Skies Designation:

There is no mention in the application of what measures will be taken to ensure that all illumination from the development does not add to existing light pollution of the SDNP. Removal or pruning of mature trees bordering the High Street will increase light pollution of an unlit rural area which acts as a buffer between urban development and countryside to the north and east.

Main Access via the High Street:

The reason given in the decision notice was: "*For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy GEN7 of the Arun District Local Plan.*" Although policy GEN7 is a "saved policy" from the 2003 Arun Local Plan and carries little weight, it is unclear how this element of the application ever met the guidelines in this Policy.

The proposed change to High Street clearly impacts upon the amenity value and safety of current users, urbanises the setting of the Conservation Area, and has

an unacceptable adverse impact on residents of adjoining listed buildings in that part of the High Street that have always had to rely on "on road" parking.

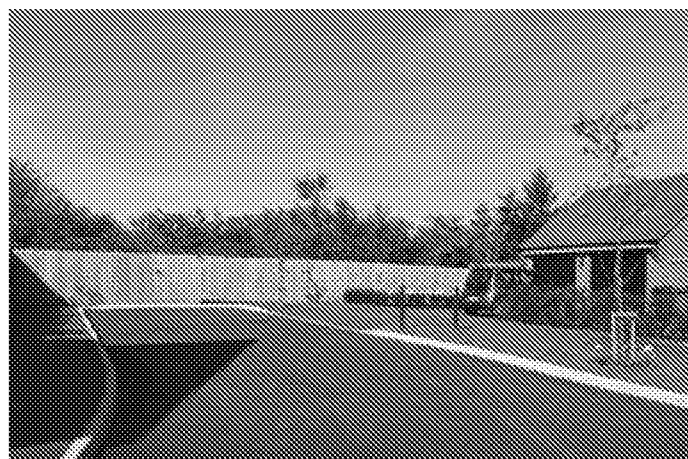
The introduction of footpaths between 1000mm and 1500mm wide are of specific concern relating to the safety of pedestrians and other types of non-motorised users when considering the current use of this rural lane.

Despite objections, in 2015 outline planning permission for the site was granted in the context of the Masterplan for the land East of Roundstone Lane. The Officer's Report also stated that *"the principle of housing development in this location is currently supported by the Council, subject to the assurance it can be delivered as a part of the strategic allocation and **not a stand alone site.**"*

The proposed access from High Street (contrary to the Masterplan) was agreed in principal, and the outline application A/51/14/OUT approved by ADC's Development Control Committee in May 2015.

The Report also said WSCC Highways would *"provide comment on the safety and capacity impact of access being taken from High Street once all supporting information has been received."*

Now, 3 years later, this application provides that additional detail and the David Wilson Homes development, on the site's southern boundary, has built the road the Masterplan originally intended to provide the main vehicle access between Roundstone Lane and the Manor Nursery site.



Nanson's Lane: The "Possible future" main access to Manor Nursery

It would be negligent and irresponsible of ADC to approve this application without

revisiting the current status of the strategic development east of Roundstone Lane against this additional detail and the concerns raised below, which we believe clearly identify Nanson's Lane as the originally intended, and most appropriate safe main vehicular access to the Manor Nursery site.

This application should go no further until Arun can justify why the High Street provides a safer and more suitable main access road to Roundstone Lane, as opposed to the purpose built access via Nanson's Lane. Like S106 agreements, this outline approval for a proposed main access via the High Street can still be challenged for valid safety and planning reasons.

Stage 1 Road Safety Audit: Produced by Gateway TSP, in August 2014, it does not comment on the current types of non-motorised use of the High Street, or whether footpaths as narrow as 1000mm are suitable for all types of user. It does observe that. . . *"the road is a semi rural two-way street. . . No on-street parking was observed during the audit team's visit"*.

As explained earlier, residents who live in that area of the High Street rely on the road for parking. It is also used as over spill parking for people using the Spotted Cow public house during opening hours, especially at weekends and in particular in the summer and when the pub is hosting special events. Whilst there is an unlit public car park at the end of the High Street, vehicle owners are reluctant to use it because of its potential to attract criminal activities, especially after dark.

Because of its limited scope, the report does not look at alternative ways ('opportunities') of improving road safety issues by looking at 'acceptable ways' / other options to access the site where many of the issues they have raised can be readily negated.

Transport Note: The additional detail provided by the applicants "Transport Note" concentrates on highway safety within the curtilage of the site itself. The proposal does not consider the current role performed by the High Street, or the implications to the safety of current non-motorised users that will have to negotiate these unacceptably narrow footpaths.

The High Street is **the main unrestricted access** along a rural lane to the SDNP (via the equestrian bridge across the A280) for pedestrians, runners, cyclists, dog walkers, families and parents with pushchairs, horse riders and others

including the elderly and disabled. It also provides access to and from Cow Lane to the village centre from the new developments to the south.

Inadequate Footways and footpaths: The latest plan provides additional detail on the widths of the proposed footpaths along High Street which clearly do not provide satisfactory standards of access for all users.

The applicant does not explain or give any reasons why the width of the proposed footpaths along the High Street are significantly less than that recommended by national guidelines, especially when you take into account that in most cases they are bounded on one side by walls or hedgerows, not verges which provide users with additional "elbow room".

The Department for Transport Manual for Streets (2007) confirms that there is no minimum width for footways. However, it suggests that in lightly used streets, the minimum unobstructed width for pedestrians should generally be 2000mm, and that in areas of higher pedestrian flow the quality of the walking experience can deteriorate unless sufficient width is provided.

Inclusive Mobility (2002) advises that ideally the width of the footway should be 2000mm to facilitate two people in wheelchairs to pass each other comfortably. Where this width is not possible, a clear width of 1500mm should be provided, with an absolute clear minimum width of 1000mm in exceptional cases taking into account permanent obstacles on the footway such as street lamp standards, trees, telegraph poles, bus shelters for example. There is no mention of street lighting in the applicant's submission. The only trees are in the hedgerows bordering the proposed footpaths.

The Highways Agency echoes this advice. It says that when footways are being designed, all pedestrians should be considered regardless of their level of mobility and that a clear width of 2000mm should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for a wheelchair (pushchair) user and a walker to pass one another safely.

Loss of Public Amenity: The Manual for Streets says, quote: "*The propensity to walk is influenced not only by distance, but also by the quality of the walking experience. This will depend on how stimulating and attractive the environment*

is, together with how safe and secure people feel within it. Design that accommodates the needs of children and disabled people is likely to suit most, if not all, user types."

The proposed design does not provide this. Instead, the current amenity value of the High Street will be irrevocably degraded by the proposed introduction of a "restricted" footpath width of between 1500mm and 1000mm, which compromise safety by not only requiring users to walk single file or step into the road to pass each other, but is not continuous and means users will have to cross and re-cross the road along its length.

The Officer's Report on the original application records WSCC's observation that the High Street narrows at two locations where the width is suitable for one-way traffic flow only. The issues with the introduction of what will be in effect are "pinch points" are well documented in regard to Station Road Angmering, including drivers accelerating to avoid having to stop

The obvious safety concerns, together with the impact of the urbanisation of the High Street and setting of Angmering's Conservation Area and SDNP, far outweighs the proposed vehicular access to the site when the specifically designed vehicle and pedestrian access to the Manor Nursery site already exists via Nanson's Lane on Swanbourne Park.

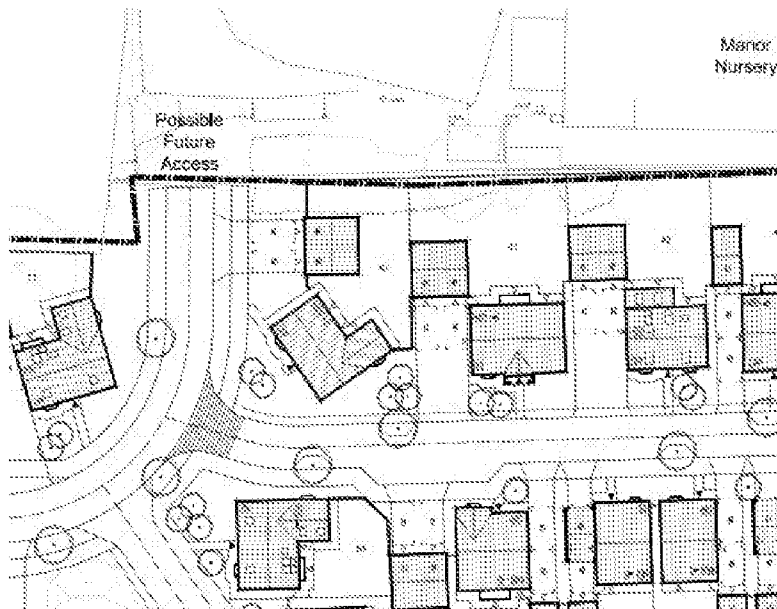
Original Proposed Main Access to the Site: The Roundstone Lane Strategic allocation was based on a Masterplan that was agreed by all the landowners and developers and on the strength of which planning permission was obtained. Each individual site was linked to each other via roads and footpaths.

A Visioning Brief was prepared by ADC which also indicated access to the site via the Swanbourne Park development. Whilst that Master Plan has been largely ignored, here there is an opportunity to utilise one aspect of its vision.

Nanson's Lane on the Swanbourne Park development is a much more suitable route. It is specifically designed as the main access route to the Manor Nursery site, without compromising the amenity role the High Street currently plays or the safety of its non-motorised users as access to the SDNP.

There's absolutely nothing stopping the developer linking the sites (Swanbourne Park and Manor Nursery) using the existing Nanson's Lane access with limited

modifications to the Manor Nursery site layout. Indeed, the applicant's site layout confirms that Nanson's Lane will be used as a non-motorised user access to Roundstone Lane via the Swanbourne Park development, however, at a cost to the existing users and residents of the High Street.



Swanbourne Park - Approved Plans (A/82/12) showing "future" access road

Highways England says: A footway/cycle way is considered to be physically separated from the carriageway if there is a verge of width 3m or more, closely spaced trees or other physical obstructions such that vehicular traffic cannot mount the footway/cycle way.

The High Street access proposal provides no physical separation between the narrow footpaths and single track road, whereas Nanson's Lane was designed as part of the Masterplan specifically for that purpose, and therefore meets national guidelines for the safety of all highway users, specifically all non-motorised users.

There is no reason as to why, even at this stage, commercial and contractual issues should be allowed to be placed ahead of the safety and well being of the community. To do so would be a dereliction of duty by the Council.