

Land north of Water Lane, Angmering

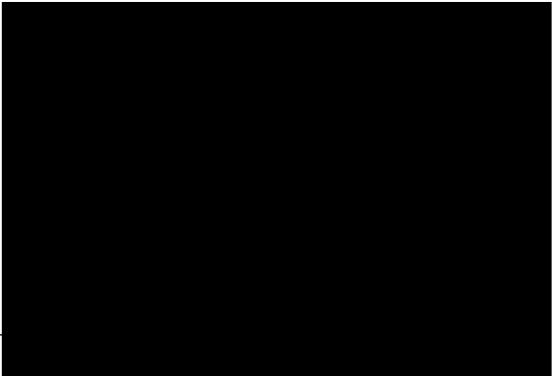
Planning Statement including Affordable Housing Statement

on behalf of Rydon Homes and Gleeson Strategic Land Ltd.

March 2018

Contact

3 Weybridge Business Park
Addlestone Road
Weybridge
Surrey
KT15 2BW



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Appendices

Appendix 1: EIA Screening Request

Appendix 2: Screening Opinion

Appendix 3: Pre-application written response

1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Rydon Homes and Gleeson Strategic Land ("the Applicants") in support of an outline planning application, with all matters reserved other principal access to the highway, submitted to Arun District Council ("ADC") for the following:

"Outline application for the development of up to 525 residential dwellings (Class C3), 3 ha (gross) of employment land (Class B1), public open space, play areas, associated infrastructure and landscaping" ("the Proposed Development").

on

"Land north of Water Lane, Angmering" ("the Site").

- 1.2 The Site forms part of what has been identified within the Council's emerging Local Plan as "Angmering North – SD9" – a strategic allocation identified by Policy H SP2c to provide 'at least 800 dwellings' over the Plan period. The Site also includes land allocated under Policy EMP SP3 (as proposed to be modified) as Strategic Employment Land Allocation 7 for 3 ha (gross) of employment.

Environmental Impact Assessment

- 1.3 The Proposed Development does not fall within the thresholds outlined within Schedule 1 of the Town and Country (Environmental Impact assessment) Regulation 2011 (as amended) (the "Regulations").
- 1.4 Schedule 2 of the Regulations identifies that an Environmental Impact Assessment ("EIA") is only required when an urban development over 5ha in size or more than 150 dwellings is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.5 On 24th April 2017 Nexus Planning submitted an EIA screening request to the Council pursuant to the Regulations (**Appendix 1**). This demonstrated that the Proposed Development, taking into account its characteristics, location and potential impact – is not likely to cause significant effects on the environment.

- 1.6 On 15th May 2017, the Council adopted a Screening Opinion (**Appendix 2**) which confirmed that the Council does not consider that the scheme is likely to result in a significant environmental impact in terms of designated landscapes and that overall no Environmental Impact Assessment is required.

Application Documentation

- 1.7 The following documentation is submitted for approval as part of the planning application:
- a. Planning Application Form (including ownership certificates);
 - b. Site Location Plan (Drawing no. 1911-P-100 Rev F)
 - c. Land Use Parameters Plan (Drawing no. 1911 P 101 Rev D)
 - d. Building Heights Parameters Plan (Drawing no. 1911 P 102 Rev D)
 - e. Site Access to Water Lane and Dappers Lane (Drawing no. ITB9105-GA-102 Rev G)
 - f. Proposed Access from Dappers Lane (Drawing no. ITB9105-GA-117)
 - g. Access link from Dappers Lane showing bus/cycle/pedestrian access (Drawing no. ITB9105-GA-118 Rev B)
- 1.8 The above should be read in conjunction with a range of technical documents and supporting material as follows:
- a. Illustrative layout (Drawing no. 1911 P 103 Rev C)
 - b. Site Location and South Application (Drawing no. 1911 P 106 Rev A)
 - c. Design and Access Statement by Pro Vision
 - d. Statement of Community Involvement by Pro Vision
 - e. Transport Assessment by i-Transport
 - f. Framework Travel Plan by i-Transport

- g. Land north and south of Water Lane, Angmering Walking and Cycling Connection Plan by i-Transport
- h. Noise Assessment by Phlorum
- i. Air Quality Assessment by Phlorum
- j. Landscape and Visual Impact Assessment by David Jarvis Associates
- k. Flood Risk Assessment by Idom Merebrook
- l. Water Level Monitoring Letter by Idom Merebrook
- m. Geo-Environmental Assessment by Idom Merebrook
- n. Preliminary Ecological Appraisal by The Ecology Partnership
- o. Bat Activity Survey by The Ecology Partnership
- p. Reptile Surveys by The Ecology Partnership
- q. Dormouse Survey by The Ecology Partnership
- r. Badger survey and mitigation plan by The Ecology Partnership
- s. Ecological Impact Assessment by The Ecology Partnership
- t. Archaeological Desk Based Assessment by CgMs
- u. Heritage Letter by CgMs
- v. Planning Statement including Affordable Housing Statement by Nexus Planning
- w. Arboricultural Survey by PJC Consultancy
- x. Arboricultural Impact Assessment by PJC Consultancy

2.0 Stakeholder Engagement

2.1 The Arun Statement of Community Involvement (April 2012) ("SCI") states in Section 8 that:

"The need for wider involvement of the community and stakeholders at an early stage in the development management process is of benefit to the public, local groups and organisations, developers and local authorities. The Statement of Community Involvement is an important tool for involving the wider community on all planning applications."

2.2 A Statement of Community Involvement accompanies this application and summarises the public consultation that has taken place to inform the Proposed Development. Most notably, a public exhibition was held at Angmering Village Hall on 18th July 2017.

Consultation with the ADC

2.3 Concept details for the Proposed Development, together with a detailed covering letter, were provided to the Council and pre-planning application advice sought in summer 2017.

2.4 A pre-application meeting was held with Michael Eastham and David Innes at ADC on 13th July 2017 and written advice was subsequently provided in a letter dated 25th September 2017 (**Appendix 3**). In particular, the Council's pre-application advice stated that:

- a. a screening request had been submitted in April 2017 and the Council had confirmed that no EIA was required;
- b. the Council was unable to demonstrate an adequate supply of housing land as required by paragraph 49 of the NPPF;
- c. relevant development plan policies were out of date and the emerging Local Plan was a material consideration;
- d. where the development plan is absent, silent of the relevant policies are out of date, the NPPF states that the presumption in favour of sustainable development requires the granting of planning permission, *'unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'*;

- e. whilst the proposal does not comply with the development plan there are material considerations that would justify a recommendation to approve the principle of mixed use development (residential and employment) on the site as it would not be contrary to the core principles within the NPPF; and
- f. a Design and Access Statement should be submitted with the application in order to demonstrate how it meets the high quality design aspirations.

2.5 Comments received during this pre-application process have been taken into consideration in the parameter plans and indicative masterplan submitted as part of this application.

Consultation with Angmering Parish Council

2.6 Two meetings with Angmering Parish Council have been held prior to the submission of this planning application. The first took place on 18th July 2017 and the second on 8th February 2018. At the first meeting a presentation was given to the Parish Council and most notably, the following comments were received:

- a. the Parish Council would like to see roundabout access instead of the proposed signalised junction on the A280;
- b. pedestrian and cycle connections between the proposed development on land south of Water Lane and the Site are important; and
- c. pedestrian and cycle routes are important throughout the Site.

2.7 These comments have been taken into consideration and are reflected in the submitted parameter plans and indicative masterplan.

2.8 At the second meeting comments were received on the following areas:

- a. the Parish welcome the inclusion of the roundabout;
- b. pedestrian connections between the proposed development on land south of Water lane and the Site are welcomed;
- c. the Parish may have companies that require employment in the area

- d. the location of the school is being discussed with the Council and WSCC.

Angmering Advisory Committee

- 2.9 The Angmering Advisory Committee meets every few months to discuss development proposals which affect the village, providing an interaction between Councillors at ADC, representatives from the Parish Council, ADC Officers and developers. The Applicants have attended a number of these meetings, most recently those in November 2017 and January 2018. At these meetings the Applicants have provided updates on the application proposals as they have emerged, including amended plans which took into consideration comments made at previous Advisory Committee meetings.

3.0 The Site and Surrounding Area

The Site

- 3.1 The Site comprises approximately 32.9 hectares (81 acres) of land to the north of Water Lane, on the north eastern edge of the existing village of Angmering. The Site comprises mainly agricultural land, although an element of land towards the Site's north eastern boundary accommodates an existing motor racing circuit.
- 3.2 The Site is enclosed to the north by the A27 and to the west by a range of business and residential properties along Dapper's Lane. There is a mix of trees and hedgerows, part of which form an ancient woodland, along the Site's eastern boundary. The A280 is located to the south east of the Site.
- 3.3 The Site slopes gradually downwards from north to south and is wholly located within Flood Zone 1 i.e. the lowest risk of flooding. There are no designated heritage assets within the Site.
- 3.4 The Site itself is not the subject of any protected landscape designations.

The Surrounding Area

- 3.5 The South Downs National Park ("SDNP") lies to the east of the A280 and to the north of the A27.
- 3.6 The land to the north, north west and east of the Site comprises a range of woodland and agricultural land. To the south is land which forms another component of the SD9 residential allocation and on which a planning application for up to 175 homes was submitted in May 2017 (and is due to be considered by the Development Control Committee on 11th April 2018).
- 3.7 The Site is located approximately 1 km from the centre of Angmering, with convenient access to a range of services and facilities by non-car modes of transport. There is an existing GP surgery 'The Coppice Practice' just under 1 km from the Site, and the surgery has confirmed that it is accepting new patients.
- 3.8 There a number of schools within 2 km of the Site including:
 - a. St Wilfrid's Catholic Primary School;

- b. St Margaret's C of E Primary School; and
- c. The Angmering School (secondary).

3.9 Looking more strategically, the Site lies to the south of the A27 which can be accessed via the A280. The A27 forms part of the Strategic Network and provides a link between Chichester and Portsmouth to the west (which are approximately 25km and 55km away respectively) and Brighton and Eastbourne to the east (which are approximately 25km and 60km away respectively).

3.10 The closest existing bus stops are located on Merryfield Crescent approximately 500m from the centre of the Site. These are served by the regular Service 9 which runs between Shoreham-by-Sea and Littlehampton. Angmering rail station is location to the south-west of the village and provides frequent services to key destinations such as Littlehampton, Worthing, Brighton, London Victoria, Portsmouth and Southampton.

Planning History

3.11 There is no relevant planning history for the Site.

4.0 The Proposed Development

- 4.1 The Proposed Development seeks outline planning permission, with all matters reserved other than principal access to the highway, for:

"Outline application for the development of up to 525 residential dwellings (Class C3), 3 ha (gross) of employment land (Class B1), public open space, play areas, associated infrastructure and landscaping" ("the Proposed Development").

- 4.2 The indicative masterplan demonstrates a potential layout which would provide:

- a. residential development – up to 525 dwellings;
- b. employment space – up to 3ha (gross);
- c. green infrastructure located across the Site including children's play facilities;
- d. pedestrian and cycle links through the Site;
- e. an access from Dapper's Lane for emergency vehicles and for potential bus access; and
- f. enhanced access from Water Lane onto the A280.

Market and Affordable Housing Statement

- 4.3 The Proposed Development will provide up to 525 residential dwellings, of which it is proposed that 30% would be affordable (up to 158 dwellings).
- 4.4 The pre-application response from ADC's Housing Strategy and Enabling Manager (Andy Elder) requests a tenure mix of 75% affordable rent and 25% intermediate housing (which accords with the relevant policy of the emerging Local Plan).
- 4.5 As this is an outline application, where layout is not for determination, the location and precise mix of the affordable homes will be agreed at the reserved matters stage. However, it is expected that the quantum of affordable housing to be delivered, and the tenure mix as requested by ADC, will be secured through a Section 106 Agreement at this stage (see Section 7 of this Statement).

- 4.6 Whist not for approval at this stage, and in order to demonstrate the ability for the Site to suitably accommodate the maximum number of homes applied for, the indicative masterplan has been based on the comments received from the Council during the pre-application process.

Site Access

- 4.7 It is proposed that the Site is principally accessed from Water Lane, although a small section of the homes proposed would be accessed separately from Dapper's Lane.
- 4.8 It is also proposed that improvements are made to the junction of Water Lane and the A280. These improvements could comprise the signalisation of this junction (sufficient to mitigate any impacts) although discussions with Angmering Parish Council have identified its preference for a roundabout solution. Further information on this and other highway infrastructure improvements can be found within the Transport Assessment submitted as part of the application.
- 4.9 The indicative masterplan identifies a footway connection adjacent to the access onto Dapper's Lane, to connect Water Lane with Merryfield Crescent. This pedestrian link would continue to the main vehicular access on the northern side of Water Lane and thereby provide a connection between the Site and the village centre. An uncontrolled crossing point (with pedestrian refuge island) is proposed on Water Lane. A footway/cycleway connection to Dapper's Lane will be provided to the north of Oak Tree Farm. A third pedestrian/cycle connection can be created from Dapper's Lane in a location south of Culberry Nurseries. This third link would also provide access for a potential bus service, and provide for emergency access into the Site.

5.0 Development Plan Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

5.2 The development plan for Arun currently comprises the following:

- i. the 'saved policies' of the adopted Arun District Local Plan (2003); and the
- ii. Angmering Neighbourhood Plan (ANP) (2015)

5.3 The Site is not allocated for development within the adopted Local Plan but, as accepted by the Council, this document is out of date on the basis that:

- i. it makes no provision for housing beyond 2011 and is, therefore, time expired;
- ii. it pre-dates the NPPF and does not seek to establish the objectively assessed housing need ("OAN") for the District, contrary to the requirements of paragraphs 14 and 47 of the NPPF;
- iii. the built up area boundaries / areas of countryside upon which Policies GEN2 and GEN3 rely were drawn based on development needs as they were understood when the Local Plan was adopted in 2003 rather than the needs of today, and
- iv. the agreed lack of a 5 year housing land supply means that, having regard to paragraph 49 of the NPPF, policies for the supply of housing should be considered out of date.

5.4 It is also the case that Policy GEN3, which seeks to protect the countryside for 'its own sake', is inconsistent with the NPPF, which adopts a more nuanced approach that seeks to take account of the different roles and character of different areas, seeking to protect and enhance 'valued' landscape (paragraph 109 of the NPPF). Policy GEN3 must also carry significantly reduced weight on this basis having regard to paragraph 215 of the NPPF.

Angmering Neighbourhood Plan (ANP)

- 5.5 The Angmering Neighbourhood Plan ("ANP") was made in March 2015. At the time that the ANP was drafted (and subsequently made), the emerging Local Plan (see below for detail) advanced the position that the objectively assessed need for housing in the District ("OAN") was just 580dpa. Of this, Policy H SP1 proposed a minimum figure of 100 dwellings for Angmering. Chapter 11 of the ANP states that an objective of the plan is to provide at least 100 dwellings within the Parish over the plan period of 2014 – 2029.
- 5.6 However, as clarified below, it is now evident that OAN for the District is significantly higher than previously assumed and provided for by the ANP. Most fundamentally, in providing for this significantly increased need for housing, the emerging Local Plan allocates the Site as part of a wider strategic residential allocation for at least 800 homes (SD9 - Angmering North).

Other Material Considerations

Emerging Arun Local Plan 2011-2031

- 5.7 The emerging Local Plan was submitted for examination in 2014, and examination sessions took place between January 2015 and September 2017.
- 5.8 Emerging development plans are a material consideration in the determination of planning applications (paragraph 216 of the NPPF), with the weight to be attached to them increasing, inter alia, as they progress through the Local Plan process.
- 5.9 With regard to the Site, the emerging Local Plan as examined proposed 8.3ha of employment land under policy EMP SP3 and at least 800 dwellings under Policy H SP2c.
- 5.10 Following the examination hearing sessions the Local Plan Inspector published his 'Interim Findings' in October 2017. Whilst taking no issues with the logic or scale of the residential allocation at Angmering North, he did ask the Council to provide further information in terms of its landscape impact. The Council responded by submitting a technical note entitled "Inspectors Interim Question Arun District Council Response to Paragraph 23" which includes viewpoints/receptors which demonstrate the potential landscape and visual effects from the SDNP. The note concludes that the effects on the setting of the SDNP are geographically limited and that most residual effects would be capable of being

mitigated.

- 5.11 In terms of the proposed allocation of 8ha of employment land under Policy EMP SP3 the Inspector considered that “only a maximum of 3ha of employment land could be accommodated” and suggested to the Council that it might want to reduce the allocation to 3ha (gross).
- 5.12 The Council consulted upon Main Modifications to the emerging Local Plan earlier this year in the light of the Inspector’s Interim Findings.
- 5.13 The Main Modifications amend Policy EMP SP3, in relation to employment provision on Site 7 (Angmering), to include the following additional text:

“...Development of site 7 at Angmering will need to be designed as part of the Strategic Allocation (SD9). Due to the close proximity to the South Downs National Park, proposals for the employment allocation will need to demonstrate that the proposal:

- *Is located in an easily accessible part of the site, in close proximity to the A280;*
- *is developed in such a way so that it will not have a detrimental impact upon the setting of the South Downs National Park;*
- *ensures that flood risk is satisfactorily mitigated; and*
- *integrates Smarter Choices transport measures.”*

- 5.14 Furthermore, the Main Modifications also amend the same policy to reduce the quantum of employment land proposed from 8.3 ha to 3ha (gross). Clarity in terms of how this is to be interpreted is provided in proposed footnote 20 which states that:

“a standard plot ratio of 0.4 shall be applied to the gross site areas to calculate the approximate floorspace that could be accommodated. The resulting floorspace shall then be discounted by 50% to account for the sensitivities of this site which borders the South Downs National Park”.

- 5.15 The Council also proposed to modify Policy H SP2c in relation to the Angmering North (SD9) strategic allocation to include the following additional text which increases the flexibility of the policy:

- a. explore opportunities to provide library access to meet identified local need either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities.*
- b. extend the existing local village health facilities in the locality,*
- c. accommodation for nursery places, linked to the primary school provision;*
- d. primary school provision (1 FE expandable to 2FE to serve Angmering North SD9 and Angmering South and East SD11), either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities, and*
- e. be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Down National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal, and*
- f) Incorporate planned new employment provision in conjunction with EMP SP3.*

5.16 The Inspector's Report is expected by the end of March. However the fact that he was content to let the Council publish the Main Modifications, which retained the allocation of the SD9 allocation in the light of the additional landscape information submitted by the Council, strongly indicates that he considers that allocation to be sound. Accordingly we consider that significant weight can now be given to Policies EMP SP3 and H SP2c.

National Planning Policy Framework 2012 ("NPPF")

5.17 The NPPF sets out the Government's planning policies and how these are expected to be applied. It identifies at paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies at paragraph 7 that there are three dimensions to sustainable development: economic, social and environmental and that the planning system must therefore perform a number of roles:

- i. an economic role – contributing to building a strong, responsive and competitive economy;
- ii. a social role – supporting strong, vibrant and healthy communities; and
- iii. an environmental role – contributing to protecting and enhancing our natural, built and historic

environment.

5.18 We assess in detail later in this Planning Statement, the accordance of the Proposed Development with the provisions of the NPPF. However, we summarise below, with reference to the three roles identified in the NPPF, how the Proposed Development would contribute to the achievement of sustainable development:

Sustainable Development	Benefit of the Proposed Development
An Economic Role	• a significant capital investment to the local area; • provision of 3 ha (gross) of employment land; • increased spending by new residents in local shops, restaurants, businesses and other services; • new housing to underpin existing and support new economic activity; • provision of direct and indirect construction jobs.
A Social Role	• up to 525 new homes, including much needed affordable housing; • a high quality physical environment with green infrastructure that will provide opportunities for social interaction; • through establishing a high quality framework for good detailed design, a reduction in the fear of crime, opportunities for crime and anti-social behaviour • improvements to the Water Lane/ A280 junction which will benefit the wider community.
An Environmental Role	• an opportunity to provide a visually attractive development with enhanced landscaping; • establishing a robust framework for high quality detailed design that reinforces local character and distinctiveness; • new green infrastructure and open space.

5.19 Importantly, paragraph 14 of the NPPF is clear that development that accords with the development

plan should be approved without delay.

National Planning Practice Guidance (2014)

5.20 On 6th March 2014, the Government published the National Planning Policy Guidance ("PPG"). The PPG is a live document that is actively updated to ensure that it remains up to date.

5.21 The PPG is divided into different topic areas, which provide advice and guidance to inform the understanding and approach to implementation of the NPPF. This will be referred to as appropriate later in this Statement.

NPPF Proposed Changes – March 2018

5.22 On 9th March the Government published the Draft revised National Planning Policy Framework. This draft document is under consultation until 10th May 2018. One of the primary aims is to boost the supply of housing with chapter 5 identifying at paragraph 60:

"to support the Government's objectives of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".

5.23 Given that the Draft revised NPPF is out for consultation it is a material consideration which can arguably be given some weight. Following the consultation the weight which can be given to this document will increase prior to its final publication.

Housing Implementation Strategy (March 2017)

5.24 Recognising the persistently poor housing land supply position in the District, the Council's Local Plan Sub Committee (December 2016) agreed to adopt a strategy to seek to address this as best it could in the short term. Part of this strategy included an agreement to invite planning applications immediately on identified HELAA sites, as well as possible first phases on sites included in the emerging Local Plan as strategic site allocations. The submission of this application accords with this strategy.

5.25 In March 2017 the Council published a 'Housing Implementation Strategy' ("HIS"), an evidence base document that seeks to support / explain the Council's position on housing in the emerging Local Plan.

Section 5 of the HIS is entitled 'Boosting supply in the short term' and, consistent with the agreement of the Sub-Committee in December 2016, recognises the housing land supply shortfall in the District. Paragraph 5.2 of the HIS confirms that the Council has adopted a strategy:

"... to invite planning applications immediately on identified HELAA sites as well as possible first phases on sites included in the Plan as Strategic Sites Allocations. Whilst it was never expected that this would address all of the short term issues, it was considered to be essential in ensuring that the Council was looking at all options in increasing housing supply in the short term"

- 5.26 The Site forms part of the Angmering North SD9 strategic allocation and would deliver up to 525 residential units and 3ha of employment land. This application accords with both the emerging Local Plan, that has been examined, and the Council's adopted HIS.

Memorandum of Understanding between ADC and the SDNP Authority (2017)

- 5.27 ADC and the SDNPA agreed a Memorandum of Understanding ("MOU") in September 2017 to assist the Arun Local Plan examination. The MOU confirmed that ADC has met the 'Duty to Cooperate' in preparing the proposed modifications to the emerging Arun Local Plan.
- 5.28 The MOU confirms that both parties agreed that Policy H SP2c would be amended to include the following additional criteria e to read as follows:

e. "be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Downs National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal".

- 5.29 Most importantly, the MOU concludes that both parties support the approach proposed by Arun District Council in the proposed modifications to the Arun Local Plan, which include the allocation of SD9 at Angmering (which in turn includes the Site).

6.0 Assessment of the Proposed Development

6.1 In this section of the Planning Statement we assess the Proposed Development against the relevant planning policies having regard to the following key issues as identified in the NPPF:

- a. Principle of development;
- b. Building a strong competitive economy;
- c. Delivering a wide choice of high quality;
- d. Promoting sustainable transport;
- e. Requiring good design;
- f. Promoting healthy communities;
- g. Meeting the challenge of climate change, flooding and coastal change;
- h. Conserving and enhancing the natural environment; and
- i. Conserving and enhancing the historic environment.

6.2 On the basis that the adopted Local Plan is, as a matter of fact, out of date (as accepted by the Council), and given that the emerging Local Plan is very substantially progressed, having already been the subject of examination hearing sessions, where the Inspector has already produced 'Interim Findings' and where his final report is due in a matter of weeks, we focus only on the compliance of the Proposed Development with the policies of the emerging Local Plan and the Angmering Neighbourhood Plan (together with general consistency with the NPPF).

Principle of Development

6.3 Paragraph 14 of the NPPF establishes the presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Development proposals that accord with the development plan should be approved without delay. Where the development plan is out-of-date, planning permission should be granted unless:

- i. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole; or
- ii. specific policies in the NPPF indicate that development should be restricted.

6.4 This approach is reinforced at paragraph 187 where local planning authorities are advised that they:

“should look for solutions rather than problems and decision-takers at every level should seek to approve applications for sustainable development where possible.”

6.5 Policy SD SP1 (Sustainable Development) of the emerging Local Plan states that the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in the NPPF.

6.6 As previously identified within this Planning Statement, the Site forms part of strategic allocation SD9 (Angmering North) as allocated by Policy H SP2c of the emerging Local Plan (as modified). This policy states that the Angmering North allocation will provide ‘at least 800 dwellings’. In addition, the Site is also allocated under Policy EMP SP3 (as modified) for 3ha (gross) of employment land. The Proposed Development accords with the provisions of these policies (as modified).

6.7 The Proposed Development does not accord with the ANP (albeit that the housing figure in the ANP is expressed as a minimum). However, as set out in paragraph 5.1, the ANP is out of date and will be superseded by the emerging Arun Local Plan once adopted. Furthermore, the Proposed Development does accord with all of the non-strategic policies as set out in the following sections of this Statement.

Building a Strong Competitive Economy

6.8 Paragraph 7 of the NPPF states that the economic dimension of sustainable development involves the building of a strong, responsive and competitive economy; by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

6.9 Paragraph 18 of the NPPF states that planning should operate to encourage and not act as an impediment to sustainable growth. As such, great weight should be placed on the need to support economic growth through the planning system. Paragraph 23 of the NPPF recognises the essential contribution that residential development can provide in ensuring the vitality of centres.

- 6.10 The ANP supports the NPPF objective to build a strong and competitive economy, but does not contain any specific policies in relation to new employment provision in the regard.
- 6.11 The Proposed Development will provide 3ha (gross) of employment land (Class B1), consistent with Policy EMP SP3 of the emerging Local Plan (as modified). Section 4 of the document entitled 'Employment Density Guide 3rd edition' published in November 2015 by HCA confirms that the average density per employee for Class B1(a) ranges from 8sqm to 13sqm. Taking an average density of 10sqm per employee, and based on the policy requirement for 6,000sqm of employment¹, the Proposed Development has the potential to generate approximately 600 jobs.
- 6.12 The construction of the development will also contribute to the local economy, generating a range of jobs. Paragraph 7 of the document entitled 'The Economic Footprint of UK House Building' published in March 2015 by the HBF confirms that as an average across the housebuilding industry, 1.5 direct full time jobs are created per dwelling. As such the Proposed Development would generate approximately 787 direct jobs. In addition, the report highlights that recent studies have identified that for every 1 direct job created, 0.5 indirect jobs in the supply chain are created. As such, the Proposed Development would create 262 indirect jobs – a total of approximately 1049 jobs overall. This is in addition to the potential for jobs in the employment element of the proposals.
- 6.13 In addition, the Proposed Development would result in an increased resident population which will help to support local businesses, facilities and services. The ONS Family Spending Report (2017) identifies that a total average weekly household expenditure for the financial year ending in 2017 rose to £554.20. In total, the direct expenditure for 525 households would amount to approximately £15,129,660 per annum gross (£554.20 x 525 x 52 weeks). A proportion of this would of course be in Angmering.
- 6.14 The additional spend is significant, and would help support the long term vitality and viability of the Arun District economy and Angmering itself.

¹ The Main Modification to the emerging Local Plan identifies that a standard ratio plot of 0.4 shall be applied to the gross site area to calculate the approximate floorspace that can be accommodated. For Angmering North this floorspace should then be discounted by 50% to account for the sensitivities of this site and location to SDNP.

For this reason the following calculation has been applied: 3ha= 3,000sqm x 0.4 plot ratio =12,000sqm x 50% = 6000sqm.

Delivering a Wide Choice of High Quality Homes

- 6.15 Paragraph 50 of the NPPF states that in order to deliver a wide choice of high quality homes, local planning authorities should plan for a mix of housing based on current and future trends, market trends and the needs of different groups in the community.
- 6.16 Policy HD3 of the ANP states that for schemes of more than six dwellings, a mix of dwelling types and sizes to meet the needs of current and future households in Angmering will be sought.
- 6.17 Policy H DM1 of the emerging Local Plan states that the Council will seek a mix of dwelling types and sizes to reflect the need of the local area with the provision of affordable dwellings including family-sized accommodation. Emerging Policy D SP1 also requires that development proposals reflect the efficient use of land, layout, landscape and its setting, density, mix, scale, massing, character materials, finish, architectural details and nearby habitats of the site and local area.
- 6.18 The housing mix for the Proposed Development is not something for approval at the outline stage. However, for masterplanning purposes, the submitted plans demonstrate that the Site could accommodate a mix of homes that can accord with the policies of the ANP and the emerging Local Plan. The submitted Design and Access Statement provides further information in this regard.

Affordable Housing

- 6.19 Paragraph 50 of the NPPF states that where affordable housing is needed, policies should be provided to meet this need on site, unless off-site provision or a financial contribution can be robustly justified.
- 6.20 Policy AH SP2 of the emerging Local Plan (as modified) states that for developments of 11 residential units or more, the Council will require a minimum 30% of the total number of units proposed on-site to be provided as affordable housing. The policy continues that the Council will negotiate the affordable housing tenure mix on developed sites from an initial position of 75% affordable rent and 25% intermediate housing.
- 6.21 The ANP simply references the Arun Local Plan affordable housing policy, which at the time of adoption was 30% for scheme of over 15 dwellings.

- 6.22 The Proposed Development will provide 30% affordable housing in accordance with the policies of the emerging Local Plan and the ANP. The Proposed Development will similarly provide a tenure mix of 75% / 25% affordable rented to intermediate, in accordance with emerging policy and consistent with that requested by ADC's Affordable Housing Officer.

Promoting Sustainable Transport

- 6.23 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Paragraph 32 states that developments that generate significant number of trips should be supported by a Transport Statement or Transport Assessment, and that plans and decisions should take into account whether:

- i. opportunities for sustainable transport modes have been taken up depending upon the nature and location of the Site, to reduce the need for major transport infrastructure;
- ii. safe and suitable access to the Site can be achieved for all people. Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development; and
- iii. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 6.24 Policy T SP1 of the emerging Local Plan advises that the Council will ensure that developments provide safe access on to the highways network, contribute to highway improvements and promote sustainable transport. The policy confirms that the Council will support developments supported by an effective and deliverable Transport Assessment which demonstrates that the transport effects of development on the local and strategic road network can be satisfactorily mitigated, and a Travel Plan which is effective and deliverable.

- 6.25 This is reinforced by Policy T DM1 which states that new development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport.

- 6.26 Policy TM1 “Local Highways” of the ANP states that new development shall demonstrate that adequate and satisfactory provision has been made to mitigate the impact of the traffic generated both during development and on completion.
- 6.27 In accordance with national and local level policies, a full Transport Assessment (“TA”) has been submitted together with a draft Travel Plan. The TA demonstrates that the Site is sustainable in terms of its accessibility to local facilities, situated within a short (850m) walking distance of local facilities. The Proposed Development will generate some 330 two-way vehicle trips in the morning and evening peak hours. The combination of committed development and the Proposed Development will increase pressure on the A280 / Water Lane junction which would, as a consequence, require improvement. An improvement scheme has been developed which would signalise this junction. This would fully mitigate the impacts of development and is deliverable entirely within the public highway. Further information on these improvements can be found in the TA.

Vehicular Site Accesses

- 6.28 Two vehicular access points are proposed to the Site. Access to the main development area is proposed from Water Lane in the form of a ghost island priority junction which will have a 10m turning length, 40m deceleration length and 15m direct taper length.
- 6.29 An additional point of access will be provided via a simple priority junction on Dapper’s Lane, approximately 100m north of the junction with Water Lane at St Deny’s South. This will provide access for a discrete development parcel of 30 dwellings only and will not provide vehicular access to the wider site.
- 6.30 In addition, an emergency / bus access will be provided from Dapper’s Lane and is discussed in more detail later in this section.

A280/ Water Lane Junction

- 6.31 As part of the TA, the capacity of the A280 / Water Lane junction has been assessed. The results demonstrate that the junction is currently within capacity but, as a result of committed developments, the junction is predicted to operate at a level close to its capacity. With the addition of the Proposed Development the junction would operate over-capacity. Accordingly, an improvement scheme has been developed and agreed with West Sussex County Council which comprises a signalisation of this junction. The TA demonstrates that the traffic signal improvement scheme would significantly improve the operation of the junction and would deliver sufficient capacity to accommodate committed development, the Proposed Development and the remainder of the proposed allocation at Angmering North (SD9).
- 6.32 Notwithstanding this, engagement with local residents, ADC and Angmering Parish Council has identified a local aspiration to deliver a further improvement which would deliver long term capacity enhancements and also remove the existing right turn restriction from Water Lane.
- 6.33 Two solutions have been considered in this regard. The first is the delivery of a right turn facility within the traffic signal improvement, and the second is a normal roundabout. WSCC has expressed a preference for the roundabout. On this basis, an alternative improvement scheme has been prepared which would replace the existing three arm restricted move priority junction with a roundabout. Further information on this can be found within the submitted TA.

Public Transport

- 6.34 The Proposed Development will create bus access to the Site from Dapper's Lane along with bus infrastructure to facilitate the diversion of local bus services. Stagecoach Service 9 provides regular services to key destinations such as Shoreham-by-Sea and Littlehampton and offers a realistic alternative to travel by the private car.
- 6.35 Discussions with Stagecoach indicate that they support the principle of diverting existing Service 9 into the Site provided that the necessary infrastructure is provided through the Site. Further information can be found within Appendix N of the TA.

Walking and Cycling

- 6.36 Emerging Local Plan Policy H SP2 identifies that strategic site allocations should integrate appropriately with surrounding communities through connectivity of transport modes, including walking and cycling.
- 6.37 Policy TM2 of the ANP “Cycling and Walking & Equestrian” identifies that support will be given to proposals which increase or improve the network of cycle ways, footways and footpaths. The policy continues by stating that proposals should seek, where possible, to create cycle paths so as to provide safe and effective routes across the Neighbourhood Area, and where possible join up with National Cycle Ways.
- 6.38 The Site is located within close proximity to a network of existing and proposed walking and cycling facilities which offer safe and convenient routes to local services and facilities on key desire lines, including the retail facilities in Angmering centre.
- 6.39 There is a footpath (Footpath 2149) that runs through the Site, providing a connection from Water Lane to Dapper’s Lane. At present the footpath is a mainly unmade track and provides for occasional pedestrian use only. As part of the Proposed Development it is proposed that the footpath will be upgraded to provide a 3m wide cycle track, and legal rights for cycle use will be dedicated.
- 6.40 A 1.5m wide footway connection is proposed adjacent to the Site access onto Dapper’s Lane to connect Water Lane with Merryfield Crescent. This would continue to the main vehicular access on the northern side of Water Lane and thereby provide a connection between the Site and the village centre. An uncontrolled crossing point (with pedestrian refuge island) would also be provided on Water Lane providing access to the land south of Water Lane (which also forms part of the SD9 allocation and for which a separate planning application has been submitted) to ensure community connectivity.
- 6.41 In addition, a footway/cycleway connection to Dapper’s Lane will be provided to the north of Oak Tree Farm. This will be in the form of a 3m wide shared use footway/cycleway and would connect onto Dapper’s Lane to provide onward connection to the Public Right of Way network. The footpath through the Site in this location will be upgraded to a cycleway.
- 6.42 A third pedestrian/cycle connection is also proposed onto Dapper’s Lane, south of Culberry Nurseries. This would provide access for bus services to route into the Site and would facilitate walking and cycling access to Dapper’s Lane and onto Merryfield Crescent

Requiring Good Design

- 6.43 Paragraph 56 of the NPPF identifies that the Government attaches great importance to the design of the built environment and that good design is indivisible from good planning.
- 6.44 Policy D SP1 of the emerging Local Plan advises that all development proposals should ensure that they are of good quality and demonstrate a high standard of design. Furthermore, Policy D DM1 sets out the aspects of design quality that should be considered including:
- i. Character
 - ii. Appearance / attractiveness
 - iii. Impact
 - iv. Innovation
 - v. Adaptability
 - vi. Crime Prevention
 - vii. Trees and Woodland
- 6.45 Policy HD6 "Housing Layout & Design" of the ANP identifies that proposals for new development should demonstrate high quality design, reflect local distinctiveness, and seek to incorporate local design features evident in buildings in the surrounding area. Layout must retain important trees and hedgerows. The planting of new trees and shrubs of similar species to those already evident in the immediate surroundings shall be encouraged.
- 6.46 Whilst only outline permission is sought at this stage, a comprehensive Design and Access Statement ("DAS") has been submitted to establish compliance with these policies and demonstrate the creation of a robust and high quality framework for good detailed design at the reserved matters stage. The DAS demonstrates that a landscape-led approach has been adopted. The Landscape Strategy on page 33 of the DAS identifies that the aim of the development is to ensure that any impact on sensitive aspects within the Site, and the surrounding landscape, have been considered throughout the design process. The landscape strategy has informed the high quality design principles being established for

the development of the SD9 Angmering North residential allocation and the EMP SP3 employment allocation, within which specific design and access principles for the Proposed Development have been identified to ensure that it will create an attractive and sustainable place to live.

- 6.47 In terms of development density, Policy HD7 “Housing Density” of the ANP states that new residential developments that propose a site density greater than the immediate surrounding area will generally be refused unless clear justification can be provided to support the need for a higher density development and how effectively the design integrates into the surrounding built form and landscape.
- 6.48 Policy D SP1 of the emerging Local Plan states that development proposals should be good quality and demonstrate a high standard of design. Paragraph 13.2.14 adds that when considering density, thought should be given to proximity of activities, routes and public transport access. Paragraph 13.2.15 requires that density is also sympathetic to a site’s surroundings.
- 6.49 The submitted DAS shows that the Proposed Development would deliver a variety of densities ranging from 40dph in the south to 23dpa in the north. This provides an average density of 35dph. The approach to density across the Site takes into account the requirements of relevant policies (including the need to deliver at least 800 homes on SD9) and site specifics, whilst responding sensitively and appropriately to its context.
- 6.50 On this basis, this application would provide a framework for the delivery of high quality development at reserved matter stage.

Promoting healthy communities

- 6.51 Paragraph 73 of the NPPF seeks to promote healthy communities by facilitating social interaction and creating healthy, inclusive communities. This includes the provision of open space, sports and recreation facilities and opportunities for new provision.
- 6.52 Emerging Local Plan Policy GI SP1 requires major development to protect and enhance existing green infrastructure assets to ensure the creation of a joined up green infrastructure network.

6.53 The objective for Community, Leisure and Wellbeing of the ANP is to:

“Deliver provision of education, health and open space, leisure and play areas for a growing community, both young and old. Ensuring that any new developments make material contributions”.

6.54 The illustrative masterplan shows how green corridors are incorporated within the Proposed Development. It includes the provision of play spaces including LEAPs, NEAPs and kickabout areas/pitches located within accessible and prominent areas on site. The DAS submitted in support of the application provides information on the landscape-led strategy for the Site having regard to the conclusions of the submitted LVIA. This strategy demonstrates the ability to connect open spaces throughout the Proposed Development, retaining where possible the landscape features including trees and hedgerows of merit, with new planting and open spaces proposed to provide a high quality green infrastructure. The design of the Site allows for strong links between areas of natural habitat in the form of habitat corridors. It has also highlighted opportunities for creating attractive recreational footpaths that link into the wider network. The aim is to create multi-functional open spaces including play areas and informal areas of open space.

Public Open Space

6.55 Emerging Local Plan Policy GEN20 states that residential development is required to provide public open space to the minimum standard of 2.4 hectares per 1,000 people, including appropriate play provision. Based on an assumed average occupancy of 2.4 people per house, the Proposed Development would generate a maximum population of 1,260 people and therefore require the provision of 3 hectares of open space.

6.56 Policy CLW2 of the ANP states that development that results in adverse effects on character, setting, accessibility, appearance, general quality or amenity value will not be supported.

6.57 The Proposed Development includes over 10 hectares of public open space i.e. more than 6 hectares in excess of that required by Policy GEN20 of the emerging Local Plan. The submitted DAS provides a breakdown of the open space as follows:

Type of Open Space	Approximate amount
Play Area	1.02ha
Informal Open Space	6.10ha
Landscape buffer	0.67ha
Ecological Enhancement	1.57ha
SUDS	0.67ha
Total Amount	10.03ha

6.58 This open space includes formal play space, informal open space, the landscape buffer to the east of the Site and areas of ecological enhancement. In addition, the Site also includes areas for SUDS and structural planting. The public open space has been designed to meet the standards as set out in the Arun District Council Final Open Space Paper (September 2016). Further information on the green infrastructure and open space strategy can be found in the submitted DAS.

Meeting the challenge of climate change, flooding and coastal change

6.59 Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided, and paragraph 103 advises that development should not increase flood risk elsewhere.

6.60 Policy ECC SP1 of the emerging Local Plan states that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change including flooding. In order to achieve this the policy requires that development is designed to take into account location including the risk of flooding and water efficiency.

6.61 In addition, Policy W SP1 of the emerging Local Plan states that the Council will support development that is appropriately located, taking account of flood risk and which promotes the incorporation of appropriate mitigation measures, particularly sustainable urban drainage systems that reduces the creation and flow of surface water.

- 6.62 Policy EH3 of the ANP advises that any new development must ensure that the prospects of flooding within the development boundaries is mitigated. The policy continues that any new development must ensure that it does not increase the flooding impact it may have on surrounding properties and areas.
- 6.63 A Flood Risk Assessment (FRA) and Drainage Strategy are submitted in support of the application. The FRA confirms that the Site is located in Flood Zone 1 - an area with the lowest probability of flooding.
- 6.64 The FRA also identifies that the risk of groundwater flooding is low, but further action is required to verify groundwater levels. Where this risk is low, no further action is required but if groundwater levels are found to be at, or near the surface, mitigation may be required as set out within the FRA.
- 6.65 In terms of surface water, the submitted Drainage Strategy confirms that mitigation is proposed to keep run-off from the Site to pre-development (greenfield) rates. Mitigation measures will include the use of permeable areas and attenuation using detention basins.
- 6.66 In terms of foul water, the FRA identifies that there are no foul sewers on or in close proximity to the Site. Accordingly, a new off-site foul sewer is required, which will need to be requisitioned from Southern Water.

Conserving and enhancing the natural environment

- 6.67 Paragraph 109 of the NPPF states that the planning system should:
- a. contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;
 - b. recognise the wider benefits of the ecosystem services;
 - c. minimise impacts on biodiversity and providing net gains in biodiversity where possible;
 - d. prevent new development from contributing to or being put at an unacceptable risk from unacceptable levels of soil, air, water or noise pollution; and
 - e. provide for remediating and mitigating degraded land where possible.

Landscape

- 6.68 The emerging Local Plan highlights the importance of the landscape's contribution to the sense of place. Policy LAN DM1 states that development should respect the particular characteristics and natural features of the relevant landscape areas and seek to reinforce or repair the character in those areas. Policy EMP SP3 as amended in the main modifications identifies that the development of employment site 7 at Angmering will need to be development in such a way that will not have a detrimental impact upon the setting of the South Downs National Park. Policy H SP2c as amended in the Main Modifications advises that any planning application for Angmering North would need to be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Downs National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal.
- 6.69 Policy HD5 of the ANP identifies that new developments must pay particular attention to integrate with both the character of nearby development as well as its landscape setting. The policy continues that new development must not adversely impact upon the landscape setting or views into or out of the South Downs National Park.
- 6.70 Policy EH2 of the ANP states that new development within land adjoining the SDNP, or that contributes to the setting of the Park, will be supported provided that it does not adversely affect the views into and out of the SDNP by virtue of its location or design.
- 6.71 Due to the proximity of the Site to the SDNP, the Proposed Development has been landscape-led to ensure that the relationship between existing landscape features, buildings and the development have been carefully considered and that they have sought to minimise landscape and visual impacts.
- 6.72 A detailed Landscape and Visual Impact Assessment ("LVIA") is submitted in support of this application and concludes that the Proposed Development would not result in any unacceptable effects on landscape character or visual amenity (as summarised below).

Landscape Effects

6.73 The LVIA confirms that the Proposed Development would result in moderate adverse effects on the local landscape character of area 43 'Ecclesden Hills' as identified in the Arun District Council Landscape Character Area, the South Downs National Park and Groom's Copse Ancient Woodland. Public footpath 2149 was also considered to experience a moderate adverse effect. Other public rights of way, including footpath 2148 and bridleway 3692, were considered to experience an adverse effect but with only moderate to slight significance. All other areas of landscape value were assessed to experience either no effect or no significant effect as a result of the Proposed Development. Mitigation measures as set out in paragraph 6.75 below address adverse effects arising as a consequence of the Proposed Development.

Visual Effects

6.74 The LVIA identifies that localised views of the Proposed Development would be restricted to receptors inside the Site, on its boundary or within 1.5km to the south and south east of the Site. With all viewpoints outside the Site that experience a view of the development, the significance of effect reduces over time as mitigation measures (as set out in paragraph 6.76) become established.

6.75 Any views of the Site from the SDNP would be limited to those areas east of the Site and would be limited to glimpses of roofs over the existing vegetation. These views would be further filtered by the mitigation planting proposed along the southern boundary of the Site.

Landscape Mitigation measures

6.76 A range of mitigation measures address both the landscape and visual effect of the Proposed Development and respond to the adverse effects arising as a consequence of the proposed development. The mitigation measures include:

- i. A landscape belt of a minimum 15m wide is proposed between the development and the Groom's Copse Ancient Woodland;
- ii. existing hedgerows and vegetation along the eastern boundary, to the north and south of the ancient woodland, would be retained and enhanced where possible;

- iii. existing tree and hedge planting along the Oval Raceway and around the Oval Race Club and track would be retained and enhanced where possible;
- iv. vegetation to the south of the Oval Race Track would be enhanced to provide ecologically important habitat areas;
- v. the area of existing scrub in the west of the main development site would be enhanced to provide ecologically important habitat areas;
- vi. planting in the north of the site would be retained and enhanced where possible;
- vii. higher ground to the north of the existing Oval Race Club and public footpath 2149 is proposed as a no-build zone, this area would be free from residential and employment development and would provide informal open space and recreational areas whilst separating the development and the A27;
- viii. areas of informal open space would break up the development within the Site;
- ix. Strategic planting within the housing areas, including tree lined streets and avenues, would break up the housing parcels and employment areas;
- x. Proposed structural planting along southern edges of both residential and employment areas in the western and southern parts of the main development area and the south western parcel would screen the development from the south;
- xi. Attenuation ponds in the west and the south of the main development area would provide opportunities for enhanced biodiversity as well as flood management;
- xii. Planting around the main access would minimise noise and lighting effect of the proposed roundabout.

6.77 It is therefore evident that any impact on the SDNP can be mitigated to avoid any unacceptably adverse impact on the landscape.

Ecology and Biodiversity

- 6.78 Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by recognising the wider benefits of ecosystems. Development should minimise impacts on biodiversity and provide net gains where possible.
- 6.79 Emerging Local Plan Policy E3 states that proposals that result in the loss of, or unacceptable harm to, an existing area will not be permitted unless:
- i. proposed mitigation measures would result in an effective solution to ensure that the integrity of the habitat continues after the implementation of the development; or
 - ii. the development concerned identifies appropriate measures for the relocation of the existing habitat to an appropriate area within 500 metres of the existing habitat and secures appropriate management arrangements for both the relocation and subsequent monitoring and aftercare.
- 6.80 Emerging Local Plan Policy ENV1 SP1 encourages the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Policy ENV DM5 of the emerging Local Plan requires that proposed developments achieve a net gain in biodiversity and protect existing habitats.
- 6.81 Paragraph 10.21 of the ANP identifies that trees and hedgerows perform a number of important roles as wildlife corridors in supporting biodiversity.
- 6.82 A number of ecological surveys have been carried out in support of this application as set out below:
- i. Bat Survey
 - ii. Badger Survey
 - iii. Dormouse Survey
 - iv. Reptile Survey

- 6.83 The Bat Survey confirms that a number of bat species were recorded using the Site for foraging and commuting, including the Barbastelle bat. As a result, all tree lines and hedges will be retained and further enhancements will be provided to provide foraging opportunities. The Bat Survey concludes that the Proposed Development would not impact upon the conservation status of bats in the local area on the basis that significant features are to be retained and enhanced.
- 6.84 The Badger Survey identified an active badger sett within the area of woodland to the south of the motor circuit. One further mammal hole was found to the south of Grooms Copse along with two mammal pathways. The Badger Survey identified 14 holes as part of the main badger sett. Five holes were not considered to be in use, but nine were considered to be active. The location of the badger sett has been incorporated into the masterplan and a 20m buffer is proposed around it to ensure that there is no negative impact as a result of development.
- 6.85 A Dormouse Survey has been undertaken as the Site was considered to have the potential to support dormice due to the connectivity to the ancient woodland and hedgerow habitats. Dormouse surveys were carried out from August to November 2015, with additional survey work undertaken between May and October 2017. Following the second survey three adult dormice were found, two were found in areas previously surveyed in 2015 and one individual was found in the northwest corner of the Site. A total of six nests were found. The Proposed Development will affect some areas of suitable dormouse habitat, particularly the hedgerows, and as such a Natural England licence will be required for clearance works. The most significant impact of development is considered to be the indirect impacts from an increased level of predators. It is therefore proposed that large buffers are established adjacent to the woodland habitat, and that planting uses species which are thorny to prevent cats entering this protected area. Dormouse boxes will be established within the woodland, if possible, and within the hedgerows on site to provide new nesting opportunities for dormice. This mitigation and enhancement strategy will ensure that the favourable conservation status of dormice in the local area will be maintained.
- 6.86 A Reptile Survey has been undertaken but did not identify any reptiles on the Site.

- 6.87 An Ecological Impact Assessment summarises the findings of the preliminary impact assessment and the individual survey reports summarised above, and concludes that the Proposed Development provides new opportunities for a range of species, with opportunities to enhance habitats for dormice, bats and birds. The Proposed Development would maintain habitat connectivity and linkages, ensuring continued bat foraging habitat and commuting corridors. New opportunities for roosting will be provided. No residual impacts on these species is predicted.
- 6.88 Impacts from the Proposed Development on off-site and adjacent habitats, including ancient woodland and lowland deciduous woodland and local SNCIs, are not considered to be significant. The Proposed Development includes an area of open green space to the north which will provide new ecological opportunities, connecting to buffer zones and off-site habitats in and around the Site and as such preserving ecological networks. The on-site green space will also help mitigate against increased recreational pressure to adjacent habitats and local designated sites. With the design of the development, maintaining such linkages and providing new habitats within the site, it is considered no impacts on off-site habitats or designations are predicted.
- 6.89 Against this background, the submitted ecological work concludes that overall, a net ecological gain can be secured as a result of the Proposed Development.

Ground Conditions / Contamination

- 6.90 Paragraph 120 of the NPPF sets out that planning should ensure that new development does not present unacceptable risks from pollution and land instability to its location. Where a site is affected, responsibility for securing a safe development rests with the developer and/or land owner.
- 6.91 A Geo-Environmental Assessment has been submitted in support of this application. The Assessment concludes that the ground conditions generally consist of topsoil underlain by cohesive superficial Head Deposit. It is, therefore, envisaged that traditional strip trench footings will be feasible across the vast majority of the Site.
- 6.92 Localised risks to future residents are considered to exist from lead, TPH, PAH and asbestos associated with the made ground encountered within exploratory locations undertaken in the area of the existing Motorsports Centre. These are considered to represent 'outliers' relating to localised pockets of contamination. The elevated concentrations of these contaminations represent a low to moderate risk to future residents via ingestion and inhalation of soil and soil-derived dust, and via dermal contact.

Clean cover is recommended to any plots within the area of the Motorsports Centre, which may be formed from site-derived natural topsoil/subsoil. This should be comprised of 600mm topsoil and subsoil in private gardens, and 300mm topsoil and subsoil in communal gardens/public open space.

Arboriculture

- 6.93 Emerging Local Plan Policy ENV DM4 advises that land and tree surveys are to be conducted as well as production of a tree constraints plan where there are existing trees on or adjacent to a development site.
- 6.94 Policy HD6 of the ANP identifies that layouts must retain trees and hedgerows. The planting of new trees and shrubs of similar species to those already evident in the immediate surroundings shall be encouraged.
- 6.95 An Arboricultural Survey ("AS") and Arboricultural Impact Assessment ("AIA") have been undertaken to support the application. The AIA identifies that some trees are required to be removed on the grounds that their condition does not permit their retention as part of the development proposals. These trees typically are either dead standing or possess a significant defect that warrants their removal. A further tree (T8), portions of G16, T20, T29, G31 and sections of G30, T33, T49 and T50 are required to be removed to facilitate the Proposed Development.
- 6.96 One tree located within the Site is subject to a Tree Preservation Order (TPO). This tree is located towards the Site's western boundary on the smaller land parcel accessed from Dapper's Lane. The access from Dapper's Lane in this location has been designed to protect this tree and the road will be designed so that it is not located within the root protection area.
- 6.97 The AIA identifies that significant scope for mitigation planting throughout the Proposed Development exists and a final landscaping plan for the new development should aim to improve tree cover across the Site, ensuring that planted trees are of a suitable specie and larger stock size.
- 6.98 The AIA recommends that an Arboricultural Method Statement should be produced at the reserved matters stage, once more detailed proposals are available. Overall, however, there are no arboricultural implications that would impact unacceptably upon the Proposed Development.

Conserving and enhancing the historic environment.

6.99 Paragraph 128 of the NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected by development, including any contribution made to their setting. Paragraph 129 adds that the local planning authority should then identify and assess the particular significance of any heritage asset and take this in to account when considering the impact of proposals. In particular, paragraph 131 states that local planning authorities should take account of:

- i. the desirability of sustaining and enhancing the significance of heritage assets;
- ii. the positive contribution that conservation of heritage assets can make to sustainable communities; and
- iii. the desirability of new development making a positive contribution to local character and distinctiveness.

6.100 Emerging Local Plan Policy HER DM6 states that there is a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains.

6.101 One of the objectives of the ANP is to ensure heritage assets are preserved. No specific policy is provided in relation to heritage.

6.102 An Archaeological Desk Based assessment has been submitted in support of this application and concludes that no designated archaeological assets lie on or in close proximity to the Site, and neither does the Site lie within an Archaeological Notification Area. The Site is identified as having a low archaeological potential for all periods, seemingly located away from settlements in agricultural land.

6.103 Accordingly, the Archaeological Desk Based Assessment concludes that, based on the available evidence, the Proposed Development theoretically only has the potential to impact upon archaeological assets of no more than local importance, and this limited interest could be secured by an appropriately worded condition.

6.104 In order to accord with validation requirements a Heritage Letter has been produced by CgMs which confirms that the Site does not lie within a Conservation Area, and there are no designated or non-designated built heritage assets within the Site or in close proximity to its boundaries. As such, there would be no impact on the setting of any built heritage assets as it is not possible to experience any built heritage assets from the Site.

7.0 Section 106 Planning Obligation

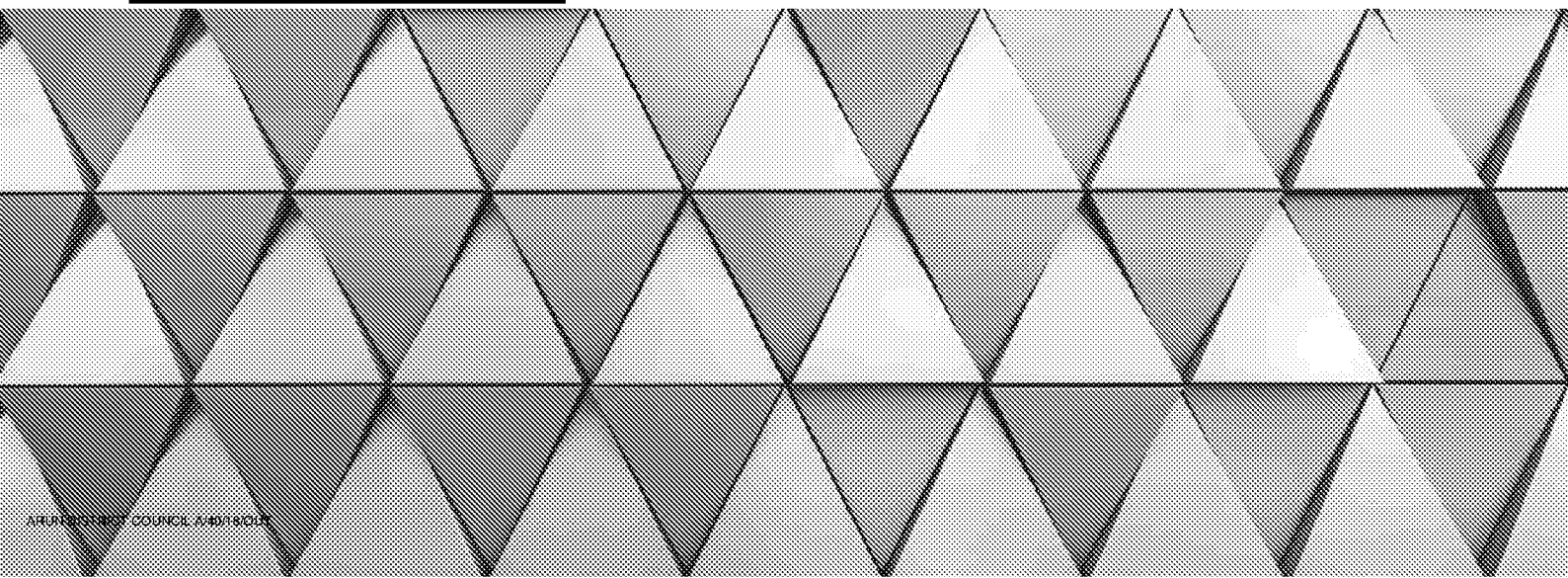
- 7.1 Draft Heads of Terms for a Section 106 Agreement, to provide a level of infrastructure to support the development in accordance with the Community Infrastructure Levy Regulations 2010 (as amended), are set out below. The exact scope and content of any Agreement will need to be discussed and finalised during the application process.
- 7.2 Discussions with the Council have identified that, subject to confirmation and demonstration of CIL compliance, the Section 106 will cover the following areas (with all other than affordable housing provision being obligations for appropriate financial contributions):
- i. Affordable housing provision (30% provision with a tenure split of 75 / 25 affordable rented to intermediate);
 - ii. transport (including local road impacts);
 - iii. healthcare contribution;
 - iv. education (towards primary, secondary and sixth form provision); and
 - v. library facilities.
- 7.3 Discussions with officers on the above will continue during the application process such that agreement can be reached by the time that this application is reported to Committee.

8.0 Conclusion

- 8.1 The Site forms the main part of strategic allocation 'SD9 Angmering North' and also includes the area of land allocated for employment by Policy EMP SP3 as of the emerging Local Plan (as modified) by the Council.
- 8.2 The Proposed Development would deliver much-needed housing and affordable housing in this highly sustainable location, allocated for development by the Council. The Proposed Development would deliver a range of social, environmental, and economics benefits to the area which include:
- i. the delivery of up to 525 new homes, including the delivery of up to 158 new affordable homes, in accordance with the provisions of the emerging Local Plan ;
 - ii. 3 ha (gross) of employment land in accordance with the provisions of the emerging Local Plan;
 - iii. significant direct and indirect economic benefits during the construction stage and ongoing as a result of the additional local spend from the new residents, in addition to the potential jobs that could be accommodated on the proposed employment land;
 - iv. creation of a robust landscape-led design framework within which high quality and locally responsive proposals, that respect the character and quality of Angmering, can be created at the reserved matters stage; and
 - v. location of new homes with excellent access to a range of facilities using non-car modes of transport.
- 8.3 The submission of the application accords with the Council's HIS which seeks to encourage applications, given the land supply position in the District, for the development of sites allocated in the emerging Local Plan, in an attempt to boost housing land supply in the short term.
- 8.4 Against this background it is evident that the Proposed Development constitutes sustainable development of a site allocated by the Council, and should be approved without delay.

*Nexus Planning
Thames Valley*

3 Weybridge Business Park
Addlestone Road
Weybridge
Surrey
KT15 2BW



Appendix 1

EIA Screening Request

Planning Department

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Weybridge
Suite A
9 Weybridge Business Park
Addlestone Road, Weybridge
Surrey KT16 2BW

Date: 24th April 2017

Our Ref: 32458

Dear Sir/Madam,

**Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) -
Request for a Screening Opinion**

Land North of Water Lane, Angmering

On behalf of our clients Rydon Homes and Gleeson Developments Ltd (the "client"), Nexus Planning is preparing an outline planning application, with all matters reserved other than principal access to the highway, for:

"Development of up to 525 dwellings, up to 65,000 sq ft of employment (B1a-c and B8 class uses), public open space, play areas, associated infrastructure and landscaping" ("the Proposed Development");

on land North of Water Lane, Angmering ("the Site").

We are writing to request a Screening Opinion from the Council under Regulation 5 (1) of the Environmental Impact Assessment Regulations 2011 (as amended) ("the EIA Regulations"), to confirm whether or not there is a requirement for an Environmental Impact Assessment ("EIA") in respect of the Proposed Development. For the reasons set out below, our conclusion is that no EIA is required.

In accordance with Regulation 5 (2) of the EIA regulations, this request is accompanied by a:

- a) a plan sufficient to identify the land;
- b) a brief description of the nature and purpose of the Proposed Development and of its possible effects on the environment; and
- c) review of the requirements for an EIA.

Further information to support our Screening Request, provided by a professional technical team, has also been integrated into this letter and includes input with regard to:

- a) transport;
- b) ecology;
- c) noise;
- d) air quality;

- e) landscape;
- f) ground conditions and contamination;
- g) drainage and flood risk; and
- h) archaeology and built heritage.

Location/Site

The Site is approximately 31.3 hectares in area and is located north of Water Lane, Angmering, to the east of the administrative boundary of Arun District. The Site currently comprises mainly agricultural land, and a portion of the Site to the north east accommodates a racing circuit. The racing use on the land comprises an oval racing circuit hosting stock car, hot rod and banger racing, special events including demolition derbys, caravan racing and a smaller inner circuit used for go-karts, mini motos and pit bike racing.

The Site is not subject to any specific international, European, national or local landscape, biodiversity, scientific, heritage or other environmental policy designation (as per paragraph 3 of Schedule 2 of the EIA Regulations).

The South Downs National park is located to the north of the Site beyond the A27 and to the south east beyond the A280. Therefore, whilst the Site is not located within this designation, consideration has been made in preparing this Screening Opinion request concerning the potential for development on the Site to impact its setting.

Site topography generally slopes downwards in a southerly direction with the exception of a plateau to the north of the Site. Woodland areas form the eastern boundary, Water Lane and a Public Right of Way (PROW) the southern boundary, existing residential and commercial developments to the western boundary (Dapper's Lane beyond) and the A27 forms the northern boundary with the Site. Within the Site there are a number of hedgerows and scrub planting areas, predominantly along field separation lines.

Whilst there are areas at risk of flooding to the south of the Site, development areas would be within Flood Zone 1, considered an area at lowest risk of fluvial flooding (less than 1 in 1000 annual chance).

As a location, the Site has good access, within walking distance, to the services and facilities within Angmering, including the village centre with its shops and services, and local schools. In terms of sustainable transport modes for journeys further afield, connections are available by public bus services and there is convenient access onto the A27 which connects with Worthing and Chichester.

In terms of nearby developments, developments to the east of Roundstone Lane south of the Site have been largely constructed, however, further development on the Worthing Rugby Football Club is currently proposed as an allocation with the emerging Local Plan for 250 dwellings (Angmering South and East – SD11). The Site forms part of draft allocation “Angmering North” (SD9) for “at least 800 dwellings”. Angmering North includes further land in addition to the Site, including land to the south of Water Lane, also promoted by the Client for 175 dwellings, and further land to the west of Dapper's Lane to the west of the site for a reported 80 – 90 dwellings (not promoted by the client). In total therefore, with the maximum number of dwellings for the Site as set out in this Screening Opinion Request, the number would be approximately 790 dwellings.

Therefore in cumulative terms, whilst not all environmental considerations will have the same catchment selection criteria for what may give rise to cumulative environmental impacts, the Screening Opinion issued by the Council will need to consider the potential for Angmering North (800 dwellings) and Angmering South and

East (250 dwellings). No other potential developments are considered to be within such a proximity to justify inclusion within any cumulative environmental impact assessment.

Requirement for an EIA

The Proposed Development does not fall within any category listed under Schedule 1 of the EIA Regulations. However, it does fall within item 10(b) of Schedule 2 of the EIA Regulations as an “urban development project” on land with an overall area comprising more than 5 hectares for more than 150 dwellings. This does not mean that an EIA is automatically required. Instead, the EIA Regulations require that an EIA be undertaken where the development is “*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*”.

The National Planning Policy Guidance (“NPPG”) (ID 4-018-20140306) states that “*only a very small proportion of Schedule 2 development will require an assessment*”. To aid local planning authorities to determine whether or not a project is likely to have significant environmental effects, the NPPG provides a set of indicative thresholds (ID 4-057-20140306):

On sites, which have not previously been intensively developed, the NPPG states that EIA is unlikely to be required unless the site area for new development is more than 20 hectares and the development would have significant urbanising effects in a previously non-urbanised area (e.g. development of more than 1,000 dwellings).

In order to assess any significant environmental effects, the selection criteria contained in Schedule 3 of the EIA Regulations should be applied. These are:

- a) the characteristics of development (having regard to size, cumulative impacts, use of natural resources, production of waste, pollution, nuisance and accidents);
- b) the location of development by reference to the environmental sensitivity of the area (having regard to (amongst other things) existing use, statutory designations and landscapes of historical, cultural or architectural significance); and
- c) the characteristics of the potential impact (having regard to the nature, extent and scale of impact, its transfrontier nature, its magnitude and complexity and the probability, duration, frequency and reversibility of the impact).

Items a) and c) of the above criteria will be explored within the following sections of this Screening Opinion request. Item b) has been provided at the introduction to this Screening Opinion, informed by attached plans.

It should be highlighted that the EIA Regulations require EIA for qualifying developments where there are likely **significant** environmental impacts, and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impacts to less than “significant” then such environmental considerations would not be sufficient to justify the requirement of an EIA. This is an important distinction.

As mentioned previously, a technical consultant team has been assembled who have already conducted a number of surveys and preliminary investigations concerning the proposed development area. Their comments have been incorporated into the relevant selection criteria for screening Schedule 2 development as outlined within Schedule 3 of the EIA Regulations.

The characteristics of the development and potential environmental impacts are explored below.

Characteristics of the Development

The Proposed Development, for the purpose of this Screening Opinion request has been based upon maximum totals and in consideration of the potential environmental impacts (whether they are likely to be significant or not) it requires recognition of this, and that submitted totals may be lower than that identified here. The Proposed Development, in environmental impact terms within this Screening Opinion request therefore represents a worst-case scenario.

The Proposed Development includes:

- up to 525 dwellings at a net density of 35dph (15ha residential land);
- up to 65,000 sq ft of employment floor space (B1 a – c and B8 Class Use) on a net development area of 1.5ha.

The Site measures approximately 31.3 hectares in size within which the gross areas include 20.7ha of residential development land (including open space, access roads and play areas), 3ha of employment land and 7.2ha of open space outside any development area to the north of the Site.

The Proposed Development would consist of a housing mix that would match as near as practicable, having regard to site constraints and a thorough masterplanning exercise, the Council's latest housing needs data at the time of submitting a planning application.

The Council published updated housing needs evidence in September 2016 which suggested the following mix of housing by size and tenure for the District:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/Starter Homes	15-20%	50-55%	25-50%	0-5%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

Draft Policy AH SP2, if adopted in its current form, would require 30% of all dwellings to be affordable (158 units) as a minimum, of which 75% would be affordable rented (119 units) and 25% intermediate (39 units). The mix of housing to be provided is not set out within this Screening Opinion request, however, for the purposes of assessing potential environmental impacts (e.g. traffic movements), how the above suggested mix proportions would relate to housing numbers on the site are illustrated in the below table:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	18 - 37	147 - 165	128 - 147	37 - 55
Intermediate/Starter Homes	6 - 8	20 - 21	10 - 20	0 - 2
Affordable Rented	42 - 48	42 - 48	18 - 24	6 - 12

Green infrastructure including new public open spaces and screen planting will also be provided within the Site, enhancing to the overall amenity of the development. Vehicular access (including pedestrian and cycle links) would be provided via Water Lane and Dappers Lane.

The most visually exposed areas of the Site, to the north and south eastern corner, would not include development as indicated on the attached Land Use Diagram plan (Reference: 1911 Sk 20). Enhanced planting to assist screening the southern border of the Site, a buffer with the ancient woodland to the east and ecological enhancement areas would be included within the proposals.

Characteristics of the Potential Impact

Any environmental impacts arising from the Proposed Development will be addressed through the supporting reports that will accompany the planning application, as identified earlier within this Screening Opinion request. The core environmental considerations are provided below, together with input from technical consultants on each issue.

Landscape

This section has been provided by DJA Landscape.

Scope of Assessment:

Environmental Consideration	Aspect of development giving rise to potential impact	Potential Impact	Proposed Scope of Works
Landscape	• Development of 525 housing units • Development of 3ha for employment use	Impact on the character and setting of the South Downs National Park, landscape character and visual amenity by virtue of a change in the appearance and character of site.	It is proposed to undertake a Landscape and Visual Impact Assessment in accordance with GLVIA 3 guidance which will include the following: • Field Survey; • a review of local landscape character assessment; • identification of landscape and visual receptors; • description and quantification of the changes to the baseline; • identification of mitigation measures; • evaluation of predicted effects; • landscape and visual assessment of the final scheme; and • assessment of the cumulative effects of the two Water Lane proposals, the adjacent assisted living flat scheme, Persimmon's c.90 dwellings and any

			developments on Roundstone Lane which are consented and / or under construction.
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Potential Environmental Impacts:

South Downs National Park, located to the north, east and southeast of the application boundary.

Views of the Site are particularly prominent from the ridge to the southeast, where the Windmill is located and the area around Ecclesden Manor and Ecclesden Farm. Warehouse and shed type buildings within the employment land would be particularly visible and not in keeping with the building types currently in the area. This would likely have a significant impact on views from the National Park to the southeast. This could be mitigated in part by setting employment buildings back from the south eastern boundary and appropriate screening.

The latest illustrative Land Use Diagram (1911 Sk 20) shows that the housing parcels would end level with Oak Tree Farm. Any development further north than this would increase the visual impact of the development from the National Park to the south east by virtue of a significant rise in the topography in this part of the Site. and would also be likely to have a significant impact on views from the National Park to the north, beyond the A27. The Land Use Diagram demonstrates this most visually sensitive area would be avoided.

The Site is visible from the National Park to the southeast and north, and as such, building types and materials should be carefully considered. If the development as proposed is in keeping with existing buildings adjacent to the Site, this would likely reduce the likelihood of significant visual impacts on views from the National Park.

Appropriate locating of development as indicated on the attached illustrative Land Use Diagram and appropriate heights and designs of development within development parcels would be sufficient to reduce the level of environmental impact on the surrounding landscape to below significant.

Landscape Character, currently within 43 Ecclesden Hills:

At the time of reserved matters, building types and materials should be considered in order to ensure the developments impact on local landscape character is at an acceptable level. Warehouse and shed type buildings within the employment land to the south of the Site are likely to have a significant visual impact on the local landscape character fronting the National Park. Accordingly, any employment buildings within the southern area of the site should be carefully considered and designed.

Groom's Copse Ancient Woodland, located along the eastern application boundary:

It is understood that a 15m landscape buffer would be required between the ancient woodland and the built development areas of the Site in order to mitigate any potential impact the development might have on the ancient woodland. As the National Park runs along the eastern boundary, we would advise the 15m landscape buffer should run the full length of the development, as shown in the latest Land Use Diagram. The 15m landscape buffer cannot include any residential properties or gardens. This should mitigate any significant impacts the development might have on the woodland.

Tree Preservation Orders, located in the south west parcel by St Denys South;

Tree Preservation Order ("TPO") reference TPO/A/1/14 applies to the group of trees in the southwest area of the Site adjacent to Dapper's Lane. The latest Land Use Diagram currently shows an access route going through the location of these trees. A detailed indicative masterplan will be prepared to look at the potential retention and protection of those trees. Should the eventual design require their removal, this would be balanced against the benefits provided by the Proposed Development as a whole, which could include replacements to be planted within close proximity or elsewhere in the Site as appropriate in order to mitigate against any losses.

Whilst there may be the potential to impact upon TPO trees, it is not considered that in terms of the EIA Regulations, that this would represent likely 'significant' environmental impact by virtue of the likelihood that measures, such as alternative planting, could be provided to lessen the level of impact. It should be noted however, that detailed design, wherever possible, would look to the retention and protection of any TPO tree.

Public Rights of Way, specifically those within the application site and to the south east within the National park.

Although the Proposed Development would not seek the redirection of any PROW it should be noted that the development would likely have a significant impact on the setting of the route located within the Site as it will change from its current rural setting to a built up environment. Access along this route would also be considered during the construction process.

The PROW outside the Site to the southeast, within the National park, currently has views of the Site. Consideration of building type and materials would be capable of mitigating the effects of views from these areas.

Other designations within the surrounding landscape:

These are generally further from the Site and/or screened by intervening landscape. Although significant impact arising from the Proposed Development upon such areas would be unlikely considered significant, the actual level of visual impact would be determined following a full Landscape and Visual Impact Assessment ("LVIA").

Landscape and Visual Impact Assessment:

DJA Landscape have already undertaken the site visit and will be looking to produce the assessment shortly, working with and informing a more detailed indicative masterplan. This would be based on the Parameter Plan once finalised. Potential cumulative visual and landscape impacts would also be assessed as part of this assessment.

Summary

In terms of the potential to impact the surrounding landscape character or visual amenity, the development of the Site will have an impact. The avoidance of the land to the north of the Site would assist in avoiding development in one of the most sensitive locations of the Site; however, the development of land to the south eastern corner of the Site would need to be carefully designed. The area proposed for SuDs to the south eastern corner would avoid development of a visually sensitive area.

Overall, subject to development being appropriately located, as indicated on the Land Use Diagram, and the appropriate design of development and landscaping within and around the Site, any potential landscape and visual impacts would not likely be considered significant. The level of impact would however be confirmed through assessments within a full Landscape and Visual Impact Assessment.

Transport and Highways

A transport Technical Note has been produced by i-Transport to outline the potential environmental impacts as a result of the additional traffic generated by the Proposed Development. This note is attached to this Screening Opinion request.

At the time the Technical Note was produced, whilst the quantum of housing was identified, the amount of employment floorspace and the type of employment uses that would be accommodated were not fixed. Therefore, i-Transport considered it prudent to test a high employment quantum to allow flexibility in the assessment of impacts. The level of employment floor space tested, in terms of highway network impact, would be in excess of that proposed within this Screening Opinion. On this basis, the Technical Note considered 12,000sqm (or 129,166sq ft) of employment floor space compared to the 65,000sq ft within this Screening Opinion request. Further, the assessment was based upon the use (B1a office development) that would have the greatest potential of impacts upon the capacity of the highway network, so logically, B1b, B1c and B8 uses would have a lesser level of impact.

The Technical Note considered the potential transport impacts of the Proposed Development individually and in combination with the likely impacts arising from other nearby developments consented and / or under construction. It concluded that there would not be likely significant impacts on the highway network, following any mitigation secured by any planning consent, as a result of the Proposed Development. A Transport Assessment (and Framework Travel Plan) would be prepared in accordance with an agreed scope of assessment with both West Sussex County Council and Highways England and submitted with the relevant planning application to fully assess the potential transport impacts of the development.

It is apparent that transport considerations would not form a justified basis upon which to require an EIA by virtue of potential environmental impacts falling short of significant.

Ecology

The Ecology Partnership have conducted a number of ecological surveys within the Site and have considered the Proposed Development as illustrated on the Land Use Diagram. Their relevant note is attached to this Screening Opinion request.

In summary, the survey work found a number of species present within the Site, particular dormouse populations and provided a number of mitigations that would protect the conservation status of the species found.

The Ecology Partnership, having regard to the work conducted on the Site to date, that either individually, or in combination with nearby consented and / or under construction developments, the Proposed Development would not likely cause significant environmental impacts in terms of ecological interests.

Flood Risk

Idom Merebrook have been appointed to appraise the potential impacts upon and as a result of flood risk (and drainage) as a result of the Proposed Development individually, and in combination with nearby consented and / or under construction developments.

In outline terms, the potential for significant impacts relate to the management of surface water runoff from the post-developed site in order to ensure that flood risk is not increased within off-site areas.

It is considered most likely that runoff from the Proposed Development will be discharged into an existing watercourse located to the south of the development land. When relying on a discharge to anything other than an infiltration system, the inclusion of surface water attenuation should be planned for within the Site. Attenuation will mitigate against issues relating to the rate of surface water being discharged; however, it will not reduce the volume of water discharged.

While our current understanding of the site geology suggests the soils will have a low infiltration potential, the use of soakaways should not be discounted and Site investigation data will be used to develop the most appropriate runoff mitigation solution.

Scope of Assessment

Environmental Consideration	Reason for Potential Impact	Potential Impact	Proposed Scope of Works
Flooding within watercourse and neighbouring areas.	Increased hard paved area positively drained into watercourse.	Risk of flooding on-site. Increased risk of off-site flooding.	Flood Risk Assessment incorporating: 1. Review of existing geology. 2. Review of Site specific intrusive investigation. 3. Review of existing overland flow. 4. Review of existing on-Site drainage, if any. 5. Development of Site specific drainage strategy. 6. Identify finished floor level constraints associated with overland flow and/or drainage. 7. Comparison of existing and proposed runoff, including mitigation proposals.

It is apparent that whilst there would be impacts arising from the Proposed Development in terms of an increased area of hardstanding, and the resultant need to appropriately deal with surface water runoff, there

would be mitigation solutions available that could effectively reduce potential impacts to a negligible level. Such details would be formed within an FRA as part of a planning application, however, given that solutions are available, it could not be deemed that there is potential for significant environmental impacts, individually from the Proposed Development or in combination with nearby consented and / or under construction developments.

Heritage (built and archaeological)

CgMs have been appointed to appraise the potential impacts that the Proposed Development may have upon built heritage and archaeological assets. Their summary of the potential environmental impacts are provided below.

In terms of the potential of the Proposed Development to cause impact upon built heritage, this would be no impact. The Site does not lie within or adjacent to a Conservation Area and there are no designated or non-designated built heritage assets within it or within close proximity. Further, there are no views between the Site and any built heritage assets or their settings and it is not possible to experience any built heritage assets or their settings from the Site. Therefore, there would be no impact upon built heritage assets.

There would be limited potential for impact upon archaeological assets, either designated or non-designated as a result of the Proposed Development

There are no designated archaeological assets on the site nor does the site lie within an Archaeological Notification Area. Further, there are no known non-designated archaeological assets on the site.

Based on the available evidence the site is considered to have a low potential for 'as yet to be discovered archaeological assets'. Any archaeological remains, should they occur, would be of a likely local significance only. Consequently, any non-designated archaeological assets on the Site, if found to be present, would not present an overriding constraint to future development on the Site.

Archaeological fieldwork is likely to comprise a geophysical survey in the first instance followed by a programme of archaeological trial trenching to determine the presence or absence of archaeological assets. In the event that important archaeological remains are encountered during these works then a programme of archaeological excavation may be required to mitigate against any development impact prior to commencement of construction groundworks.

Therefore in summary, it would be appropriate to mitigate against the potential for the discovery of currently unknown archaeological assets (if any) through planning conditions attached to any consent. On this basis, there would not be any likely significant environmental impacts arising from the Proposed Development upon archaeological assets.

Noise Impact

Phlorum Limited have provided a summary assessment of the potential impacts on the environment in terms of noise. This assessment is provided below.

Environmental Consideration	Aspect of development giving rise to potential impact	Potential Impact	Proposed Scope of Works
Noise	• Development of up to 525 housing units • Development of 3ha for employment use (1.5ha net)	Noise impact of traffic on Water Lane and A27 on residential Noise impact of employment on both existing and proposed residential Construction noise and vibration effects on existing residential Noise effects of existing industrial units on residential	It is proposed to undertake a Noise Assessment which will include the following: • Baseline measurements (some already completed but additional required for revised concept); • Construction noise & vibration impact; • Traffic noise assessment using IMMI noise modelling software (relevant traffic data to be provided); • Industrial noise assessment from both existing and proposed employment areas; • Identification of mitigation measures; • Assessment potential impacts arising from the Proposed Development in combination with the south of Water Lane proposal (175 dwellings), the adjacent assisted living flat scheme, Persimmon's (c.90 dwellings) west of Dapper's Lane and any developments on Roundstone Lane which are consented and / or under construction.

Potential Significant Impacts

The Land Use Diagram shows a residential area directly adjacent to Water Lane. Appropriate noise mitigation measures such as acoustic barriers and sound insulation measures (glazing and ventilation) will be required to provide acceptable internal and external noise when considered against the targets in BS8233:2014.

The Land Use Diagram shows a buffer zone between the A27 and the proposed housing areas. However, the potential noise impact arising from traffic on the A27 will still require appropriate sound insulation measures to protect the nearest houses to the A27 and possibly acoustic barriers around gardens to meet the outdoor living area noise levels in BS8233:2014.

The noise impact of employment land located directly adjacent to proposed residential land has the potential to generate significant noise dependant on the type of uses that would take up units on the site. However, this can be mitigated in the design of these areas to minimise the noise effects.

The noise impact of existing industrial/commercial use adjacent to the proposed residential area adjacent to Water Lane will require further investigation to determine the extent of any required noise mitigation measures.

Overall, it is clear that whilst there is the potential for a degree of environmental impact upon (nearby highways and commercial uses) the proposed dwellings, such impacts could be mitigated through design. As such, in terms of noise considerations, there would be no environmental impacts caused by the Proposed Development that would not constitute "significant" environmental impacts in terms of the definitions within the EIA Regulations.

Air Quality Impact

Phlorum Limited have appraised the potential environmental impacts that may arise on Air Quality as a result of the Proposed Development. Their summary assessment is provided below.

Environmental Consideration	Aspect of development giving rise to potential impact	Potential Impact	Proposed Scope of Works
Air Quality	• Development of up to 525 housing units • Development of 3ha (1.5ha net) employment use	Air quality impact of traffic on Water Lane and A27 on proposed residential. Air quality impact of traffic generated by proposed uses on existing dwellings, particularly in Angmering. Construction phase, nuisance dust impacts on existing receptors. Cumulative impacts of these types as a result of approved and in construction developments in the vicinity.	It is proposed to undertake an Air Quality Assessment which will include the following: • Baseline assessment with reference to local authority monitoring data and Defra mapped predictions; • Construction phase assessment with reference to Institute of Air Quality Management (IAQM) guidance; • Detailed dispersion modelling (ADMS-Roads) of NO₂ and PM₁₀ concentrations at the façades of existing and proposed residential dwellings; • Modelling of cumulative effects with other proposed developments in vicinity including land south of Water Lane, Persimmon's 90 dwellings west of Dapper's Lane and any developments on Roundstone Lane

			which are consented and / or under construction; and • Identification of mitigation measures. For the operational phase, this will include an emissions cost calculation in line with the Sussex air quality guidance.
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Potential Significant Environmental Impacts

It is not thought that there will be any significant residual impacts during the construction phase as the construction assessment will determine the level of risk and recommended appropriate mitigation measures according to this risk.

Based on assessment work to date, occupants of the proposed dwellings are unlikely to be exposed to unacceptable air quality. Background air quality is good and it is not anticipated that contributions of the key pollutants (i.e. NO₂ or PM₁₀) from key local roads (i.e. the A27, A280 and Water Lane) would be great enough to cause exceedances of the key UK Air Quality Strategy Standard concentrations.

The Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) air quality planning guidance provides indicative criteria below which it is accepted that significant impacts would be unlikely to occur. These criteria include a change of light duty vehicle flows of:

- a) more than 100 Annual Average Daily Total (AADT) within an AQMA, or
- b) more than 500 AADT outside of an AQMA.

Given the scale of the proposed housing component alone (up to 525 dwellings) it is anticipated that the 500 AADT threshold would be comfortably exceeded. However, whilst the threshold would be exceeded, this is not confirmation of significant environmental impacts in terms of Air Quality, rather that an Air Quality Assessment would be required. It is normal for such assessments to be provided in support of a planning application as a standalone report.

Overall, given the low background pollution concentrations, there is a low chance of significant impacts on air quality. Cumulatively with nearby consented and / or under construction developments, whilst there would be impacts upon air quality, these would not be expected to be significant.

Ground Conditions

Idom Merebrook have been commissioned to investigate the ground conditions at the Site and the potential impacts arising from or upon the Proposed Development. A summary of their comments are provided below.

The north eastern corner of the Site is currently occupied by a motorsports race track and associated buildings / infrastructure, whilst the remainder of the Site is largely undeveloped agricultural land. The published geological map indicates that the underlying strata across the Site comprise superficial deposits of

Alluvium (clay, silt, sand and gravel), Head Deposits (clay, silt, sand and gravel), and River Terrace Deposits (sand, silt and clay). These superficial drift deposits may be locally absent across the north of the Site. The published geological map indicates that the underlying strata across the site comprises bedrock geology of London Clay Formation (clay, silt and sand) to the north and Lambeth Group (clay, silt and sand), Lewes Nodular Chalk Formation (chalk), and Tarrant Chalk Member (chalk) to the south.

The latest Land Use Diagram indicates that the Site will be redeveloped for mixed-use residential and commercial / industrial. This will introduce sensitive receptors including construction workers (temporary), residents and future Site users.

An intrusive investigation has been undertaken by Idom Merebrook in September 2015 which identified limited areas of contaminated made ground associated with the motorsports centre.

The ground gas monitoring undertaken recommends that the Site be classified as NHBC 'Amber 1' / BS8485 Characteristic Situation 2 due to slightly elevated carbon dioxide. In addition, the Site lies within a radon affected area and basic radon protection measures will be required in new buildings.

It is considered that large-scale remediation of soils is not required. Any contamination will be appropriately remediated as part of the development of the Site. The identified risks can be generally be mitigated by removal or capping of the source, and installation of gas protection measures in new buildings, however further delineation will be required to confirm the extent of remedial measures.

Therefore it is considered that the development will not have any significant environmental effects in relation to ground conditions and contamination.

Cumulative Impact

Each technical consultant has considered the potential environmental impacts which may arise as a result of the Proposed Development in combination with nearby consented and / or under construction developments. In particular, technical input has focussed on the potential for 'significant' environmental impacts.

None of the technical disciplines have responded with the likelihood of significant environmental impacts individually or in combination with nearby developments following mitigation. Furthermore, given that all potential impacts could be mitigated to bring them to a less than significant level, it would not be likely that even when considering the combination of the impacts upon each environmental consideration that it could be deemed significant.

Summary

The EIA Regulations are specifically designed to consider the potential "significant" environmental impacts for developments where there is a likelihood of there being significant environmental impacts individually or in combination with nearby developments. The likelihood of impacts alone is not sufficient, in line with the EIA Regulations, to consider a development to be EIA development, nor would it be sufficient where there is potential or likelihood for significant environmental impacts where the presence of appropriate mitigation is already known.

On this basis, the conclusion of our assessment as to whether the Proposed Development should be considered EIA development and require the production of an ES is that it should not. EIA should be reserved,

as intended by the legislation, for developments, which have a realistic likelihood of causing “significant” environmental impacts individually or in combination, of which the Proposed Development is not one following the findings from a number of technical assessments.

It is noted that the Council has three weeks from the date of receipt to form a Screening Opinion. We trust that you have sufficient information to determine whether this is an EIA development under the EIA Regulations; but should you need any further information or clarification, please do not hesitate to contact either myself or my colleague Fay Goodson.

Yours Sincerely



Zoe Knott
Senior Planner