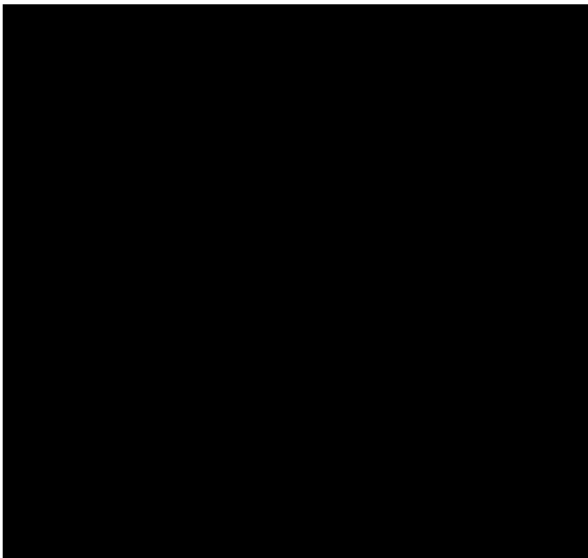


Land north of Water Lane, Angmering

Planning Statement including Affordable Housing Statement

on behalf of Rydon Homes and Gleeson Strategic Land Ltd.

March 2018



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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.

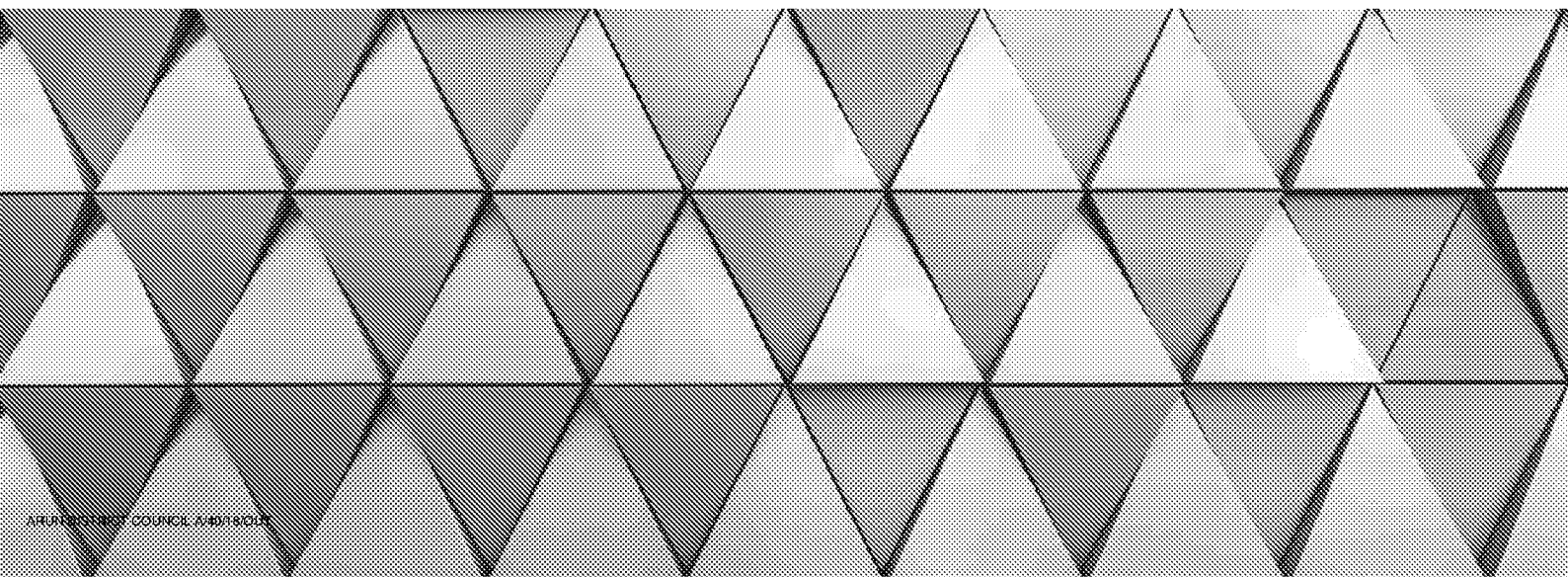
7.0 Section 106 Planning Obligation

- 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



Appendix 1

EIA Screening Request

Planning Department

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

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,

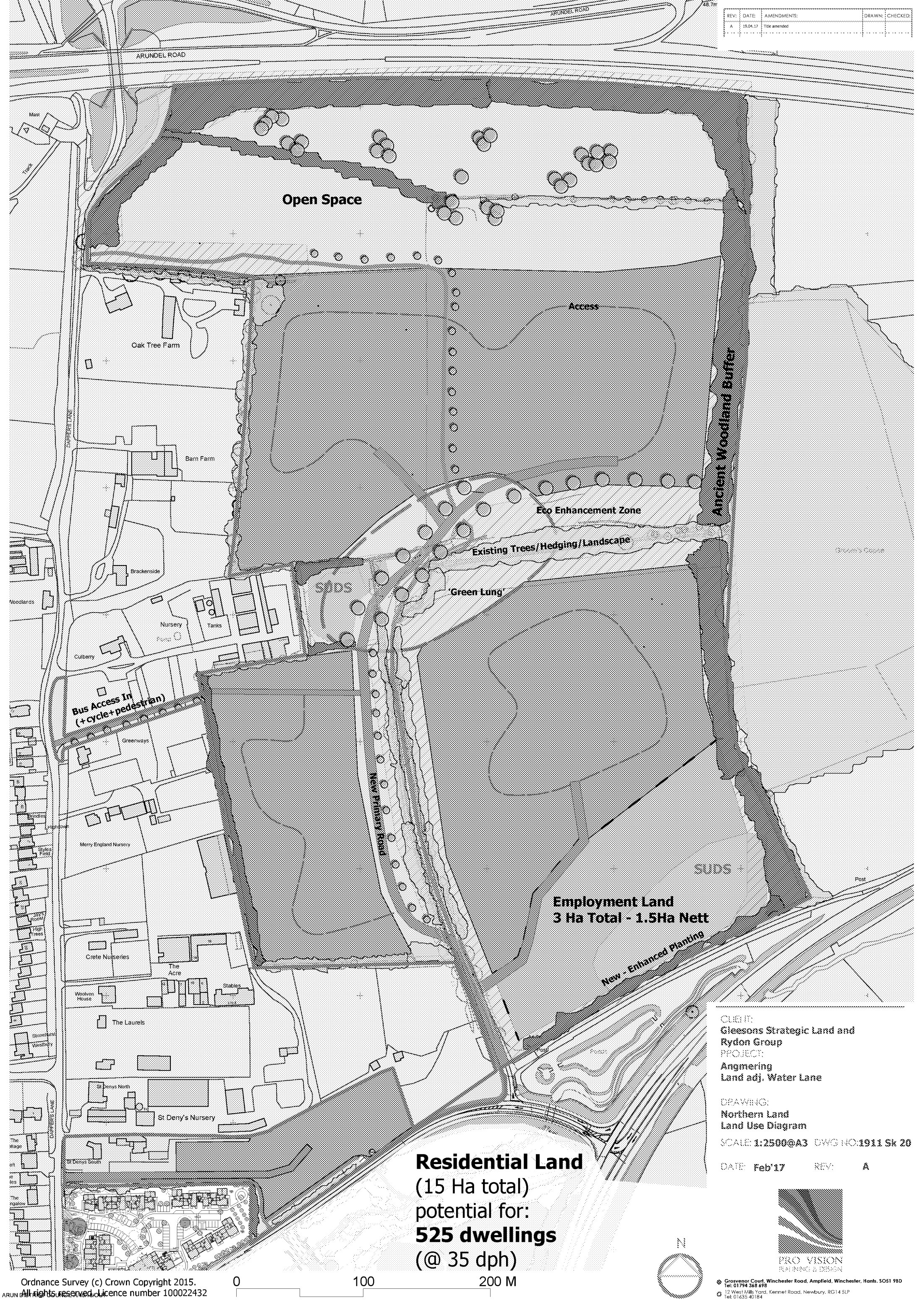
as intended by the legislation, for developments, which have a realistic likelihood of causing “significant” environmental impacts individually or in combination, of which the Proposed Development is not one following the findings from a number of technical assessments.

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



REV:	DATE:	AMENDMENTS:	DRAWN:	CHECKED:
A	19.04.17	Title amended		

CLIENT:
Gleasons Strategic Land and Rydon Group
PROJECT:
Angmering Land adj. Water Lane

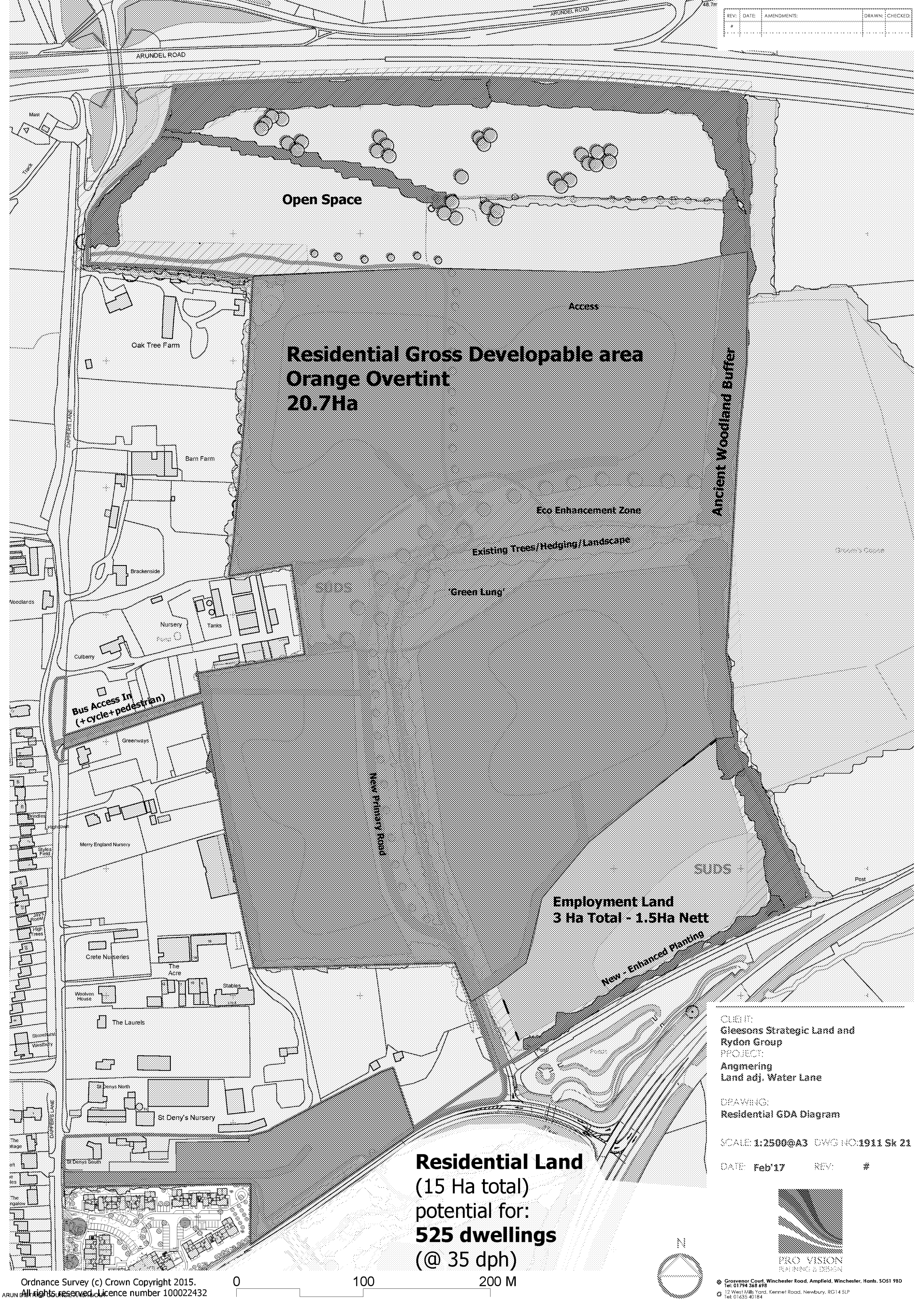
DRAWING:
Northern Land Land Use Diagram

SCALE: **1:2500@A3** DWG NO: **1911 Sk 20**

DATE: **Feb'17** REV: **A**

Residential Land
(15 Ha total)
potential for:
525 dwellings
(@ 35 dph)





REV:	DATE:	AMENDMENTS:	DRAWN:	CHECKED:
#				

CLIENT:
Gleasons Strategic Land and Rydon Group
PROJECT:
Angmering Land adj. Water Lane

DRAWING:
Residential GDA Diagram

SCALE: **1:2500@A3** DWG NO: **1911 Sk 21**

DATE: **Feb'17** REV: **#**

Residential Land
(15 Ha total)
potential for:
525 dwellings
(@ 35 dph)



TECHNICAL NOTE

Project No: ITB9105
Project Title: Land at North Angmering
Title: EIA Screening Input - Transport
Ref: TW/ITB9105-015 TN
Date: 7 April 2017

SECTION 1 INTRODUCTION

- 1.1 Rydon Homes and Gleeson Developments Ltd are promoting Land at North Angmering as a mixed-use residential-led development. i-Transport has been appointed to provide highways and transport advice in relation to the proposals.
- 1.2 To determine whether an Environment Impact Assessment (EIA) is required under the EIA Regulations, it is intended to submit a Screening Opinion to Arun District Council (ADC) (as local planning authority). To inform the Screening Opinion this note has been prepared to identify the likely highway and transport impacts of the development, and to consider whether any significant environmental impacts are likely to result, both individually and cumulatively with other local planned growth.
- 1.3 The remainder of this note considers:
- Section 2 – Site Location and Development Proposals
 - Section 3 – Potential Transport Impacts
 - Section 4 – Potential Cumulative Impacts
 - Section 5 – Summary and Conclusion

SECTION 2 SITE LOCATION AND PROPOSALS

- 2.1 The site is located to the north of Water Lane, in the north-east of Angmering Village. The site is bounded by Water Lane to the south, to the east by the A280, to the north by the A27, and to the west by existing built development fronting Dappers Lane.
- 2.2 The development proposals comprise:
- Up to 525 residential dwellings;
 - 3ha Employment Land providing 1.5ha Nett developable land; and
 - Open Space provision.

- 2.3 The mix and configuration of the employment land is not known at this stage and so for the purposes of this note it is assumed that 3ha of employment land would yield up to 12,000sqm of employment space (at 40%), and further that this employment space would be provided as B1a Office development, which in traffic terms represents a 'worst-case' assessment compared to other employment uses.
- 2.4 The site is proposed to be accessed from Water Lane in the location of the existing access to the Oval Raceway, some 50m north of the Water Lane / A280 junction. It is proposed to access the site through an improved priority junction with designated right-turning facilities. This would provide the sole vehicular access to the main part of the site. Vehicular access to that part of the development at St Denys South would be accessed by a simple priority junction to Dappers Lane.
- 2.5 Pedestrian, cycle and emergency access is proposed in a number of locations:
- At Water Lane at the vehicular access, including pedestrian and cycle crossing facilities of Water Lane;
 - To Dappers Lane at St Denys South;
 - To Dappers Lane to the south of Culberry (to include bus access); and
 - To Dappers Lane north of Oak Tree Farm.

SECTION 3 POTENTIAL TRANSPORT IMPACTS

- 3.1 The Proposed Development would have potential traffic and transport effects during both the construction and operational phases. In accordance with the Institute of Environmental Management and Assessment's (IEMA's) 'Guidelines for the Environmental Assessment of Road Traffic (Guidance Note No. 1)' the following potential environment effects may arise from development:
- Severance;
 - Pedestrian delay;
 - Pedestrian amenity;
 - Fear and intimidation;
 - Driver delay;
 - Accidents and safety; and
 - Dust and dirt.

- 3.2 In terms of **Severance, Pedestrian Delay, Pedestrian Amenity, and Fear and Intimidation** effects, the site access strategy promotes a connected and permeable development which provides a number of opportunities for future residents and employees to reach the site on foot without being significantly affected by traffic conditions on local roads. The strategy seeks to provide a number of connections to Dappers Lane, which is a quiet residential road and provides connections onwards to the residential and service areas of the village. The access strategy also promotes safe crossing facilities of Water Lane to access the wider development to the south. For those reasons, it is not considered likely that there will be significant Pedestrian Delay, Pedestrian Amenity, Severance and Fear and Intimidation effects.
- 3.3 To consider **Driver Delay**, a draft Transport Assessment was prepared and submitted to both West Sussex County Council (WSSCC) as local highway authority, and Highways England (HE) as highway authority responsible for the Strategic Road Network, in this case the A27 corridor.
- 3.4 The Transport Assessment presented and agreed the parameters of the Transport Assessment including:
- Vehicular Trip Rates – for residential and employment uses;
 - Traffic distribution and assignment; and
 - Scope of assessment area.
- 3.5 Table 3.1 presents the assessment of traffic impact from the proposed development.

Table 3.1: Predicted Traffic Impacts

Development	Morning Peak (08:00 – 09:00)			Evening Peak (17:00 – 18:00)		
	In	Out	Two-way	In	Out	Two-way
Residential (525 Dwellings)	71	171	242	149	88	236
Employment (3ha – 12,000sqm)	150	25	175	9	135	144
Total	221	196	417	158	223	380

- 3.6 The proposal is likely to generate some 420 two-way vehicular movements in the morning peak hour and some 380 movements during the evening peak hour. Due to the mix of uses these movements are relatively balanced in each peak period. The potential impacts of traffic in terms of **Driver Delay** is presented in Section 4, concluding that any likely effects can be mitigated adequately.
- 3.7 A review of the local accident data (PIA) provided by West Sussex Constabulary identifies that the following accidents have occurred within the study area over the latest five-year period, comprising:
- Three accidents at the A280/ Water Lane Junction;
 - Two accidents at the junction of Dappers Lane and Water Lane;
 - Four accidents occurred along Station Road/Water Lane;
 - Seven accidents at the High Street / Weavers Hill Junction;
 - Eight injury accidents occurred on the A27 roundabouts; and
 - Three accidents occurred on the A27 through the A280 junction.
- 3.8 The number, cause and severity of accidents are typical of a study area of this scale and the detailed assessment does not identify any accident trends or patterns which would suggest that there are any significant **Accident and Safety** issues that would be exacerbated by the proposed development.
- 3.9 In terms of **Dust and Dirt**, whilst there will inevitably be some impacts of the development during the construction phase, these can be addressed through management measures, such as a Construction Traffic Management Plan. Due to the nature of the proposed development, there is unlikely to be any significant Dust and Dirt impacts during the operational phase of development.
- 3.10 On this basis, it is concluded that whilst there will inevitably be transport impacts arising from the development, any such impacts can be managed and mitigated such that there are unlikely to be any remaining significant impacts. A detailed Transport Assessment (and Framework Travel Plan) will be provided as part of any planning application to consider and address any significant impacts of the development.

SECTION 4 POTENTIAL CUMMULATIVE TRANSPORT IMPACTS

4.1 The EIA Regulations require the potential significant impacts of a development proposal to be considered in isolation and in combination with other development proposals in the local area. In the context of North Angmering, the following developments are identified as relevant:

- South of Water Lane – Proposed development of 175 Dwellings to be submitted shortly by the applicants of Angmering North;
- Roundstone Lane Masterplan developments including combination of occupied, permitted, under construction and proposed developments making up a development of 700 residential dwellings:
 - Application number A/51/14/OUT - Manor Nurseries for 32 residential dwellings – Approved March 2015;
 - Application number A/82/12 – Land East of Roundstone Lane for 138 residential dwellings – Approved May 2015;
 - Application number A/135/12 – JV Plants – Pound Nursery for 36 residential dwellings – Approved November 2014;
 - Application number A/154/14/OUT – Roundstone Place Roundstone Lane for 18 residential dwellings – Approved April 2015;
 - Application number A/122/12 - VHB Nurseries for 195 residential dwellings – Approved February 2015;
 - Worthing Rugby Club for 193 residential dwellings – Awaiting Planning Application; and
 - Site 101 (SHLAA) for 100 residential dwellings – Awaiting Planning Application.
- Land West of Dappers Lane – Land promoted as part of the wider Angmering North site and being considered for development of 90 dwellings.

4.2 In addition, a recent development has also been approved at Broadlees, Dappers Lane, for 53 care apartments (A/27/16/PL). In transport terms the Transport Statement provided with the application confirms that the site will generate a negligible amount of additional traffic (less than 10 vehicle movements in each peak period).

4.3 **Driver Delay** is likely to be the most pronounced in combination effect of the developments in Angmering.

- 4.4 The draft Transport Assessment carried out assessment of the impact of the local highway network to consider the effects of development. This considered the cumulative impacts of the development proposed at Land at North Angmering, Land South of Water Lane as well as the Roundstone Lane Masterplan development. Whilst the specific impacts of the Lane West of Dappers Lane and Broadlees were not included, TEMPRO growth factors were included and would account for the moderate additional development impacts of these developments.
- 4.5 The assessment considered the future operation of key local junctions and identified their operational capacity (measured by Ratio of Flow to Capacity (RFC) or Degree of Saturation (DOS) for signalised junctions) and average vehicle delay. In two cases, at Water Lane / A280 and at A280 / A27 / Titnore Lane, the assessment identified the need for mitigation measures to ensure there was not a significant impact of the development. Deliverable mitigation measures were identified and included in the assessment. Table 3.2 presents a summary of the operational assessment.

Table 4.1: Summary Operational Performance – Masterplan Option A

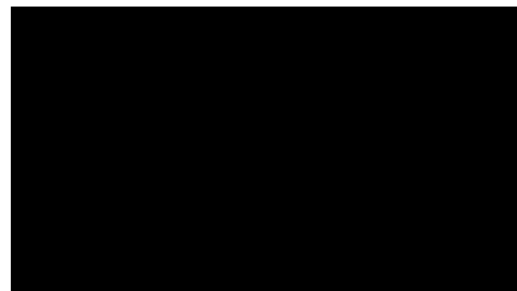
Junction	Morning Peak		Evening Peak	
	Max RFC / DOS	Delay (Seconds)	Max RFC / DOS	Delay (Seconds)
Water Lane Site Access	0.63	27	0.60	22
A280 / Water Lane (signalised improvement)	76.5%	35	68.4%	9
High Street / Water Lane	56.7%	7	42.9%	6
A280 / Titnore Lane / A27 (Approach improvement)	0.84	15	0.87	15
Long Furlong / A280 / A27	0.84	5	0.88	7

- 4.6 It is demonstrated that the traffic impacts of the development can be adequately mitigated and as such there is unlikely to be any significant residual cumulative effects of development on **Driver Delay**.
- 4.7 In terms of other potential impacts (such as **Severance, Pedestrian Delay, Pedestrian Amenity, Accidents and Safety and Fear and Intimidation**), whilst the cumulative development of Angmering will inevitably impact on the local transport network and its users, such impacts are expected to fall below a level of significant impact.

- 4.8 To consider in full detail the cumulative impact of development in Angmering, the development proposal would be supported by a detailed Transport Assessment (and Framework Travel Plan) prepared in accordance with an agreed scope of assessment with both WSCC and HE. This would follow industry standard guidelines to ensure that any impacts are fully and thoroughly assessed, and any necessary mitigation is identified.

SECTION 5 SUMMARY AND CONCLUSION

- 5.1.1 In line with the EIA Regulations a Screening Opinion is to be submitted to ADC to confirm whether an EIA is required for development of Land at North Angmering for a mixed-use development of up to 525 dwellings and 3ha employment.
- 5.1.2 The proposed development will generate additional travel demand, and particularly additional traffic on the local highway network (some 400 movements in peak times). The development will also generate non-vehicular travel, namely pedestrians and cyclists using the local network, to access local facilities.
- 5.1.3 In line with the IEMA Guidelines, potential transport impacts of the development have been identified and considered. In view of the access strategy, which directs non-vehicular movement to quiet roads and provides crossing facilities, it is not likely that there will be significant impacts on **Pedestrian Delay, Pedestrian Amenity, Severance and Fear and Intimidation** effects. In terms of Driver Delay, initial assessment work has demonstrated that whilst there are some impacts on the operation of the local network, deliverable mitigation measures are available such that the impacts of the development on **Driver Delay** are not likely to be significant.
- 5.1.4 A review of the cumulative impacts of the development of North Angmering alongside development South of Water Lane, Roundstone Lane and West of Dappers Lane has been carried out. In this regard, it is concluded that the cumulative development of Angmering will inevitably impact on the local transport network and its users, such impacts are expected to fall below a level of significant impact.
- 5.2 A detailed Transport Assessment (and Framework Travel Plan) would be prepared in accordance with an agreed scope of assessment with both WSCC and HE and submitted with an application to fully assess the transport impacts of the development.



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KT15 2BW

Land to the North of Water Lane, Angmering

EIA Screening Note – Ecology Report

Location and Proposals

The site is located on land to the north of Water Lane, Angmering (grid reference TQ 075052). The proposals for the site include the construction of up to 525 dwellings, employment land and open space provision.

Baseline Ecological Data

An extended preliminary ecological appraisal was undertaken on the 7th August 2015. The surveyors identified the habitats present, following the standard 'Phase 1 habitat survey' auditing method developed by the Joint Nature Conservancy Council (JNCC). The site was surveyed on foot and the existing habitats and land uses were recorded on an appropriately scaled map (JNCC 2010). In

addition, the dominant plant species in each habitat were recorded. The potential for the site to support protected species was also assessed.

As a result of the preliminary ecological appraisal ('PEA') further protected species surveys were undertaken including:

- Biological records purchased from SxBRC in 2015
- Hedgerow assessment 2015
- Bat transect surveys 2015
- Remote sound recording for bats 2015
- Dormouse surveys 2015
- Reptile surveys 2015
- eDNA survey 2016

Results of the surveys in 2015 and 2016 have identified the following:

- The site consists primarily of arable fields, surrounded by significant hedgerows and tree lines. There are hedgerows throughout the site, which provide connectivity to the adjacent ancient woodland. There are no ponds on site; however there is an offsite pond that lies adjacent to Water Lane, as well as two ponds or waterbodies within 250m of the red line boundary that could be identified from OS Mapping.
- Ancient woodland, Groom's Copse, lies adjacent to the site on the eastern edge.
- A total of five hedgerows on site were considered to be important due to species richness and associated features.
- Bat activity surveys identified a high number of common pipistrelles using the site with other species recorded including serotine and noctule or Leislars. All activity on the site was limited to the habitat edges. The grazed agricultural grassland was considered to be of negligible importance to bats. No bat roosts were identified on site during the survey.
- Anabat remote recording identified further species including common and soprano pipistrelles, brown long eared bat, serotine, noctule and myotis species. The most common species present on site was the common pipistrelle which was recorded in significantly higher

numbers than other species. Other species recorded were limited in passes with only occasional passes of some species across the whole of the recording period.

- Dormouse surveys identified the presence of a population of dormice within the ancient woodland on the eastern aspect of the site. The dormice were also found along the species rich hedgerows along the centre of the site and down the hedgerows which lie adjacent to the main access.
- Reptile surveys were conducted in September 2015. No reptiles were found in any suitable habitat across the whole of the site.
- eDNA surveys of the pond to the south of the site (the balancing pond) did not identify any GCN DNA within the pond. Other ponds within 250m of the site were fishing lakes.
- Other species identified on site include a main badger sett within the central tree line and hedgerow. Water voles were also identified in the off site balancing pond.

Potential Impacts

Potential construction effects include:

- Loss of habitat, including scrub habitat, small sections of hedgerows and habitats including fields and agricultural land use;
- Disturbance to European protected species (dormice);
- Disturbance to other protected species (badgers) and their foraging habitat;
- Loss of bird nesting habitat within hedgerows;
- Loss of bat foraging habitat and potential disturbance to commuting routes;
- Loss of habitat and habitat fragmentation in relation to the site and wider landscape; and
- Impacts on protected sites and / or habitats including ancient woodland to the east of the site.

The scoping report will identify whether these potential impacts are considered to be significant in terms of nature conservation and ecological value at the site and in the wider landscape.

Potential operation effects include:

- Management of the sites habitats with regards to nature conservation interest;
- Potential operational impacts on nesting bird, badger and dormouse habitat etc;
- The provision of opportunities for wildlife on site; and
- Maintaining some degree of habitat linkages across the site and with habitats in the wider landscape.

Operational effects will be reviewed in terms of running of the site in light of the development as per the masterplan. The operational effects will be reviewed in terms of the local landscape and the wider landscape and their nature conservation value.

Cumulative Impacts

Assessment of the cumulative effects of the proposed development north of Water Lane, in combination with the promoted land south of Water Lane (175 dwellings), the adjacent assisted living flat scheme along Water Lane, Persimmon's 90 dwellings scheme located to the west of Dapper's Lane and any developments on Roundstone Lane which are consented and / or under construction.

Any cumulative impact assessment is considered likely to identify some potential impacts with regards to dormice and bats, however, the impacts are considered to be below the threshold of what would be deemed significant. Potential mitigation measures and compensation measures, which must be addressed in all of the sites, would ensure that European Protected Species are maintained at their favourable conservation status.

Indeed, it is considered that only development to the north of Water Lane would be considered to be 'in combination' in terms of potential impacts on species such as dormice that have been identified within the redline boundary due to the lack of suitable habitats and habitat fragmentation to the south of Water Lane.

There are potential ecological gains and as such potential positive long term impacts resulting from the proposed layout in terms of enhancements of landscape connectivity and new native woodland planting.

Mitigation/Compensation

Surveys have been completed in 2015 have identified a range of protected species using the site and as such outline mitigation measures have already been proposed which include the following recommendations:

- 15m buffer along the eastern edge of the site to buffer an impacts form development on the ancient woodland;
- Providing an enhanced connective landscape along the northern edge of the site for dormice, linking Grooms Copse on the east to further woodland blocks to the west.;
- Provision of new additional dormouse habitat on site through suitable planting;
- Ensuring the no back gardens back onto any maintained tree line, hedgerow or ancient woodland buffer;
- Defensive planting along the edges of the site where required to protect dormice and other species, where required this can include cat proof fencing or double hedgerow planting;
- Lighting plans which include removal of lighting along edges of the site where significant habitats are present with no lighting to be focused on tree lines, woodland edges, hedgerows or newly created woodland or hedgerow habitats;
- Low level lighting within the site as a whole;
- Maintenance of hedgerows on site where possible;
- Maintenance of the green centre of the site, which includes the badger sett;
- Maintaining green linkages throughout the site to ensure species, including badgers, can move across the site and into the wider landscape;
- Provision of new habitats on site, including SUDs ponds, which will be planted to enhance for local wildlife, including water voles;
- Planting new habitats such as wildflower areas to the northern edge of the site to provide new opportunities for bats and birds as well as invertebrates;
- Other enhancement to the site including bat and bird boxes.

Conclusion

The proposed development will result in the loss of habitats which are considered to be common and widespread and of limited ecological interest including managed grassland, species poor grassland habitats and agricultural fields.

The most significant habitat is considered to be the ancient woodland habitat. This is off site and as such there would be no direct impacts. Indirect impacts would be minimised to this habitat through the use of the 15m buffer zone located across the whole of the eastern edge of the site. Other significant habitats within the boundaries are the central tree line which links to the ancient woodland and the two parallel hedgerows. All of these are to be maintained within the scheme. Mitigation measures, including the design of a 'green lung' on site and provision of open space, ensures that these features are retained and maintain their ecological functionality.

The site itself supports foraging and commuting bats and dormice, with a main badger sett located within the central 'green lung'. It is considered that the design of the site will ensure that bats can continue to move across the site post development. Furthermore, the open space provision and the enhancement specially along the northern aspect of the site, will create more optimal habitats than what is currently present.

In terms of dormice, indirect impacts resulting from increased population, and as such domestic cat predation is considered to be the only impact which would be considered a likely negative impact. However, the proposals for the site aim to enhance the opportunities for dormice within the boundaries through creation of new woodland areas, providing new connections between western woodland and create buffer zones and planting schemes which will benefit dormice and reduce to a minimal potential predation by cats. As such it is considered that the impacts would not be significant and would fall well below a level that could be considered significant in terms of EIA definitions. Indeed the design of the development has been such as to ensure that the favourable conservation status of these species in the local area is maintained.

With regards to cumulative impacts, development to the west of the site will also have to accommodate bats and dormice, supported by their ecological assessments. These will include compensation and mitigation measures. The creation of an enhanced northern edge of the site could provide enhanced connectivity across the north of Angmering and as such a more linked and connected landscape. This

could create a more enhanced environment for a range of species including bats, badgers and dormice. It is considered that cumulative impacts would be at a threshold that would not be considered significant.

In summary, having regard to the survey work already conducted on the site north of Water Lane, there would be no likely environmental impacts, in terms of ecological interests, either directly as a result of the proposed development, or in combination with nearby consented / under construction developments, that could be considered significant. Any impacts could be appropriately mitigated through design, with further opportunities for enhancements.

Kind regards



Alexia Tamblyn MA (Oxon) MSc CEnv MCIEEM FRGS
Managing Director

Appendix 2

Screening Opinion

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Weybridge

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15th May 2017

Please ask for:
Claire Potts
Strategic Development
Direct Dial: 01903 737698

Our Ref: PE/00265/17

Environmental Screening Opinion for Land North of Water Lane, Angmering

The Council considers the above proposal to be an Infrastructure Project (Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas) within paragraph 10(b) of Column 1 of Schedule 2 of the Environmental Impact Assessment (EIA) Regulations 2011. The site area of 31.3 hectares exceeds the applicable threshold of 5ha and the number of dwellings exceeds 150. The proposal is therefore Schedule 2 development and requires screening under the provisions of the EIA Regulations 2011 (as amended) and you have requested a screening opinion which was received on the 24th April 2017.

It is therefore necessary to consider the proposal against Schedule 3 of the Regulations. This schedule outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. The criteria includes the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration).

In addition, the Schedule 2 indicative thresholds set out in the Planning Practice Guidance (Paragraph: 058, Reference ID: 4-058-20140306) state in respect of 10(b) Infrastructure Projects that:

"Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

Sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5 hectares; or*
- (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or*
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)."*

Furthermore, the following are identified as the key issues to consider –

Nigel Lynn Chief Executive
Nigel Croad Resources Director and Deputy Chief Executive

Environmental Health
Littlehampton and Bognor Regis
Customer Services Help Points



The Council's Commitment

Our Screening Response now continues with regard to the Schedule 3 headings.

(1) Location of the Development

The existing land use is a greenfield site in agricultural use, with part of the site taken up by the Oval Raceway. The site is adjacent to low density development along Dappers Lane, which then joins the built up area of Angmering to the west. To the east lies further agricultural land and the South Downs National Park (SDNP). The SDNP is also beyond the A27 to the north. Woodland areas form the eastern boundary, Water Lane and a Public Right of Way the southern boundary, and existing residential and commercial developments to the western boundary. The A27 forms the northern boundary.

The majority of surrounding land uses to the west are residential which would be affected by the development, as would users of the surrounding network of footpaths/ PROWs.

There are areas at risk of flooding to the south of the site but the information submitted shows that development areas would be in flood zone 1 which has the lowest risk of flooding.

(2) Characteristics of the Development

The proposal is for up to 525 dwellings on a 31.3 ha site, to include up to 65,000 sq ft of employment (B1a-c and B8 class uses), public open space, play areas, associated infrastructure and landscaping. There is the potential for cumulative impacts if other sites which are being considered for development around Angmering (as promoted for consideration as part of the emerging Arun Local Plan) were to come forward at the same or similar times. This includes Land South of Water Lane (175 dwellings) and Land to the West of Dappers Lane (80-90 dwellings). Developments to the east of Roundstone Lane have been largely constructed with the exception of Worthing Rugby Football Club. The cumulative impacts associated with the three proposed areas coming forward for development will be greater than each site individually. The total number of dwellings would be close to 790 on all three proposed sites. Therefore, the magnitude of the impacts and urbanising effects of all three sites combined could be significant.

The development will result in the use of natural resources in the construction of the built development on site. It will not result in such a significant production of waste that would have an impact on the need for an EIA. The proposal does have the potential to release pollutants to air, land or water and would result in a number of HGV movements during construction but no greater than any comparative major residential scheme.

The development will generate additional traffic and people movements within the local area. However, it is not considered that this will be significant in the context of the EIA regulations having regard to the existing residential nature of the surrounding land uses, although the boundary to the east with the SDNP will need careful consideration to minimise the impacts on the SDNP.

Although, as considered above, the combined effect of three large scale developments on traffic would lead to more significant impacts on the local area.

(3) Characteristics of the Potential Impacts

The extent of the impact on the landscape will depend on an assessment of the sensitivity and capacity of the landscape to accommodate large scale development. The site lies within the Angmering Upper Coastal Plain (West Sussex Landscape Character Assessment). The local Landscape Character Area is the Ecclesden Hills. Angmering is situated on gently rising ground at the foot of the Ecclesden Hills with Highdown Hill close by to the east. The Arun Landscape Capacity Study carried out for the emerging Local Plan has assessed character of the site and divided it into three areas: 12b, 12c and 14. 12b is located to the north east of Angmering but is

detached from the settlement boundary. 12c is located adjacent to ribbon development along the north-east edge of Angmering. Area 14 is to the east of Angmering but detached from the main settlement boundary and adjacent to the SDNP.

The Landscape Character Assessment concludes the following in relation to each area of the site:

12b: Substantial sensitivity, slight value – it would be difficult to mitigate the effects of a detached unit of settlement and to mitigate the effects on the setting of the National Park to the south east, given the elevated location of the site. A public right of way runs through the site with open views from the public right of way to the south. There are long distance views towards the landscape to the south and intervisibility with the SDNP to the south east. Poling Furzelds is located to the west of the site and Groom's Copse which is ancient woodland to the east. There are some semi mature trees around the site boundaries and well developed hedgerows which have the potential to provide habitat connectivity. The report concluded that the area had substantial landscape sensitivity and low capacity and would be unsuitable for significant development in landscape terms. In terms of landscape value, the area forms part of the wider rural setting of the SDNP and the conclusion was 'slight' landscape value.

12c: Moderate sensitivity, moderate value – there is some existing landscape structure within the site which could be enhanced to provide mitigation to views from the public right of way and the SDNP. The rurality of the public right of way would need to be protected. The western side of the site is more suitable for development. The site has mixed native and non-native boundary vegetation. There are some mature trees along the public right of way to the east. The southern paddocks are good quality semi improved grassland. In terms of landscape value, the site is also part of the wider rural setting of the SDNP and soft edge to the settlement and the overall value is moderate.

14: Substantial sensitivity, moderate value – substantial boundary vegetation provides habitat connectivity for local wildlife and the area is adjacent to ancient woodland. The area has a visually prominent setting to the SDNP and there are clear views of the site from the public right of way in the north east corner and from the SDNP. Open south facing topography would make mitigation from the SDNP very difficult. In terms of landscape value, the area forms part of the wider rural setting of the SDNP and the conclusion was 'moderate' landscape value.

However, whilst the landscape sensitivity on two areas of the site is substantial and there will be an impact in terms of the setting of the SDNP, it is not considered that landscape impacts will be significant in the context of the EIA regulations. However, a Landscape Visual Impact Assessment will be required, along with a clear masterplan and design code for the site to show how the development can be designed to minimise the impacts on the setting of the SDNP. Of particular concern is the employment area of the site, which would require a high quality scheme with appropriate heights and styles of buildings (avoiding generic 'sheds') and effective screening.

As set out in the screening request, the retention of TPO trees and protection/ buffering of the Ancient Woodland area to the east of the site will be important considerations in the masterplanning for the site.

The information submitted on ecology identifies the presence of dormice, a badger sett and a high number of bats using the site. A total of five hedgerows on site were considered to be important due to species richness and associated features. The impact identified in the ecology report submitted include the potential construction effects – loss of habitat, disturbance to European protected species (dormice), disturbance to other protected species (badgers) and their foraging habitat, loss of nesting bird habitat, loss of bat foraging habitat and potential disturbance to commuting routes, loss of habitat and fragmentation in relation to site and the wider landscape and impacts on protected sites and/or habitats including ancient woodland to the east of the site. Other operational effects are also noted. The cumulative impacts have also been considered in the submitted ecology report and deemed to be below the threshold of what would be significant. The extensive mitigation and enhancement measures proposed would need to be incorporated into the masterplan for the site and supporting information submitted with any applications to demonstrate that the impact on ecological interests is acceptable. It is not considered likely that the

development will result in significant harm to ecological interests, and that appropriate mitigation can be employed to respond to any localised harm that occurs.

The area is also sensitive to changes in drainage patterns which would result from new development in the area. The main site is not at risk of flooding, although the area to the south of the site along the road is within flood zone 3, and the development represents a potential opportunity to improve the existing surface water drainage system and reduce the discharge rates to local watercourses. As set out in the submitted information, there would be impacts arising from the development in terms of an increased area of hardstanding and the resultant need to appropriately deal with surface water runoff but there would be mitigation solutions available that could effectively reduce potential impacts to a negligible level and this would be set out within a Flood Risk Assessment submitted with any application. It is not considered that the development will result in a significant impact in relation to flood risk.

The submitted information considers the transport impacts of the proposal in relation to the following potential impacts: severance, pedestrian delay, pedestrian amenity, fear and intimidation, driver delay, accidents and safety and dust and dirt. The submission concludes that there are not likely to be any significant impacts on pedestrian delay, pedestrian amenity, severance and fear and intimidation because the strategy promotes a connected and permeable development with connections to wider services in Angmering. It also proposes safe crossing facilities for Water Lane to access the wider development in the south. In relation to driver delay, the draft Transport Assessment (TA) concludes that the proposal would generate 420 two-way vehicular movements in the morning peak and 380 movements during the evening peak hour. The draft TA also includes a cumulative assessment taking into account other recent and proposed development in Angmering. The TA demonstrated that there will be some impacts on the operation of the local network but the traffic impacts of the development can be adequately mitigated and as such there is unlikely to be any significant residual cumulative effects of development on driver delay.

Although the increase in vehicular and other modes of traffic will be noticeable within the local area, it is not considered that this impact will be significant (in the context of the EIA Regulations) or long lasting. It is likely that over time, the new development will be accepted by the local population and the impacts will therefore soften and fade. It is also considered that subject to pedestrian crossing improvements, much of the site lies in a location that will allow people to access local facilities and services without the need to use a private car. A Transport Assessment would be required to be submitted with any application in order to fully assess the transport impacts of the development, including any cumulative impacts.

The submitted information demonstrates that mitigation could be provided against the discovery of currently unknown archaeological assets and that there would not be any likely significant environmental impacts arising from the proposed development upon archaeological assets. 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 in close proximity.

Finally, although the construction phase of the building would result in some impacts (such as noise and dust) on the local population, these effects are likely to be short lived and not significant given the location of the site. The information submitted on noise concludes that the noise impacts will need to be assessed and any negative impacts mitigated through the design of the scheme. In relation to air quality, the submitted information concludes that an Air Quality Assessment would be required to be provided in support of a planning application but that there is a low chance of significant impacts on air quality. There is no information to suggest that the proposal would result in the exceedance of air quality objectives in the area.

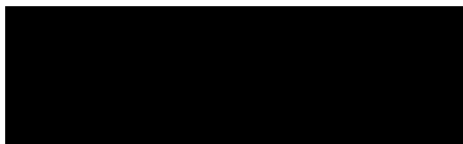
The submitted information also demonstrates that the development would not have any significant impacts in relation to ground conditions and contamination.

Conclusion

Having regard to the characteristics of the proposal Arun District Council (ADC) do not consider that the proposal is likely to give rise to particularly complex and hazardous effects. In the context

of the existing settlement of Angmering ADC do not consider that a significant effect on the environment is likely in terms of changing the nature of land use in the area. Whilst there is likely to be an impact on the setting of the SDNP (which is a 'sensitive area'), the proposals would not affect the integrity of any sensitive area to the extent that a significant effect is likely. Therefore on the basis of the current information, ADC do not consider that the scheme is likely to result in a significant environmental impact in terms of designated landscapes and overall no Environmental Impact Assessment is required.

Yours sincerely,



Claire Fotts
Strategic Development Team Leader

Appendix 3

Pre-application written response



DRAFT

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning General Enquiries
Tel: (01903) 737756 Fax: (01903) 730442
Dx: 57406 Littlehampton
Minicom: 01903 732765
e-mail: planning@arun.gov.uk
website: www.arun.gov.uk/planning

Your Ref:

Our Ref: PAA/139/17/

Please ask for: Michael Eastham

01903 737772

25th September 2017

Dear Ms Knott

Pre-Application Advice

525 dwellings with 3ha of employment land, public open space, play areas, associated infrastructure and landscaping.

Land North of Water Lane Angmering West Sussex

I write regarding the above matter and your enquiry received on 17th July 2017.

Description Of Proposed Development

From the details submitted, I understand that you propose to develop approximately 525 dwellings, approximately 3ha of employment land, public open space, play areas, associated infrastructure and landscaping on 30ha (74 acres) of land to the North of Water Lane, Angmering. An illustrative masterplan for the site has been prepared to demonstrate how the proposed 525 dwellings and 3ha of employment land could be accommodated.

Description Of Site

The site comprises agricultural land in arable use and a portion in the north east corner of the site accommodates a racing track. The site is sloping from north to south. The site boundaries have hedgerows interspersed with trees. The site is bounded by a mix of trees and hedgerows.

Description Of Locality

The site is bounded to the north by the A27; to the south by Water Lane; and to the west by Dappers Lane with existing businesses and residential properties. The land to the south of the site beyond Water Lane is subject to a separate planning application (A/99/17/OUT) for 175 dwellings. There is further residential development to the south off Roundstone Lane in Angmering. The area is rural in character with the South Downs National Park to the north of the site beyond the A27 and to the south east beyond the A280.

Planning Issues

The following issues have been identified for consideration.

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Principle of development
 Design
 Neighbour Amenity
 Amenity Space Provision
 Affordable Housing
 Highways, Transport and Parking
 Sustainability
 Sustainable construction
 Flooding / Drainage
 Protected Trees
 Light pollution
 Noise pollution
 Contamination
 Infrastructure provision
 Biodiversity
 Protected species
 Crime
 Loss of Agricultural land
 Landscape impact
 Archaeology
 Housing supply
 Bin Storage

Relevant Planning History

Comment On Site History

A screening request was submitted in April 2017 and the Council confirmed that no Environmental Impact Assessment was required.

Relevant Policies - the following policies are considered relevant to your proposal:

Arun District Local Plan:	AREA10	Strategic Gaps
	GEN11	Inland Flooding
	GEN12	Parking in New Development
	GEN14	Public Transport
	GEN15	Cycling and Walking
	GEN18	Crime Prevention
	GEN2	Built-up Area Boundary
	GEN20	Provision of Public Open Space within New Development
	GEN21	Renewable Energy
	GEN23	The Water Environment
	GEN25	Water Resources
	GEN26	Water Quality
	GEN28	Trees and Woodlands
	GEN29	Nature and Conservation Across the District
	GEN3	Protection of the Countryside
	GEN32	Noise Pollution
	GEN33	Light Pollution
	GEN34	Air Pollution
	GEN7	The Form of New Development
	GEN8	Development and the Provision of Infrastructure
	GEN9	Foul and Surface Water Drainage

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Publication Version of the
Local Plan (October 2014):

C SP1 Countryside
D DM1 Aspects of Form and Design Quality
D DM2 Internal Space Standards
D DM3 External Space Standards
D SP1 Design
ECC DM1 Renewable Energy
ECC SP1 Adapting to Climate Change
ECC SP2 Energy and climate change mitigation
EMP DM1 Employment land: Development Management
EMP SP1 Employment land provision
EMP SP Strategic employment land allocations
ENV DM3 Non Designated Sites
ENV DM4 Protection of Trees
ENV DM5 Development and Biodiversity
ENV SP1 Natural Environment
GI SP1 Green Infrastructure and Development
H DM1 Housing Mix
HER DM3 Conservation Areas
HER DM6 Sites of Archaeological Interest
HER SP1 The Historic Environment
H SP1 Strategic housing, parish and town council allocations
H SP2 Affordable Housing
HWP SP1 Health & Wellbeing
INF SP1 Infrastructure provision and implementation
LAN DM1 Protection of Landscape Character
OSR DM1 Open Space, Sport and Recreation
QE DM1 Noise Pollution
QE DM2 Light Pollution
QE DM3 Air Pollution
QE SP1 Quality of the Environment
SD SP1 Sustainable Development
SD SP2 Built-Up Area Boundary
SKILLS SP1 Employment and Skills
SO DM1 Soils
T DM1 Sustainable Travel and Public Rights of Way
T SP1 Transport and Development
W DM1 Water Supply and Quality
W DM2 Flood Risk
W DM3 Sustainable Urban Drainage Systems
WM DM1 Waste Management
W SP1 Water

Angmering Neighbourhood Plan 2014 POLICY CLW1	Provision of a Youth Centre
Angmering Neighbourhood Plan 2014 POLICY ER1	Retail Provision
Angmering Neighbourhood Plan 2014 POLICY HD1	Built-up Area Boundary
Angmering Neighbourhood Plan 2014 POLICY HD2	Parish Housing Allocation
Angmering Neighbourhood Plan 2014 POLICY HD3	Housing Mix
Angmering Neighbourhood Plan 2014 POLICY HD4	Materials
Angmering Neighbourhood Plan 2014 POLICY HD5	Built Form
Angmering Neighbourhood Plan 2014 POLICY	Housing Layout & Design

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HD6	
Angmering Neighbourhood Plan 2014 POLICY	Housing Density
HD7	
Angmering Neighbourhood Plan 2014 POLICY	Parking for New Developments
HD8	
Angmering Neighbourhood Plan 2014 POLICY	Phasing of Residential Development
HD9	
Angmering Neighbourhood Plan 2014 POLICY	Local Highways
TM1	
Angmering Neighbourhood Plan 2014 POLICY	Cycling Walking & Equestrian
TM2	

Modification to the Local Plan (2017)

Planning policy guidance

Principle

The site lies in a countryside location, outside the built-up area boundary (BUAB) as identified in the Arun Local Plan 2003 where the principle of development is considered unacceptable; and Policy HD1 in the Angmering Neighbourhood Plan (ANP). Development Plan policies seek to exert a strict control over new development in the countryside to protect it for its own sake. Development will only be permitted in exceptional circumstances or where there is a strong justification for a countryside location. The Government's planning advice indicates that planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced.

Policy H SP1 of the Publication Version of the Arun Local Plan (modified eALP 2017) says that 'within the plan period 2011-2031 the Council will provide for 20,000 new homes through the Local Plan' and the Housing Strategy on page 139 goes on to allocate 800 units in Angmering North. The draft site allocation - as identified on the Policies Map - lies to both the north and south of Water Lane, in Angmering. Parts of the housing allocation for Angmering North are in the process of being delivered in parcels of land notably along Dappers Lane.

The made Angmering Neighbourhood Plan (2014) identifies three sites to meet its housing requirements for the parish: Bramley Green South (Mayflower Way) (HA1); Field in Mayflower Way (HA2); and Chandlers Site (HA3). The site north of Water Lane is not included as an allocation in the Angmering NP.

However, the Council is unable to demonstrate an adequate supply of housing land as required by paragraph 49 of the NPPF. The suspension of the Examination into the Local Plan by the Planning Inspector on the grounds that the Council's Objectively Assessed Housing Need (OAN) should be reviewed higher than that proposed in the Local Plan (originally 580 units per annum). The Council will need to identify more suitable land supply to meet additional housing requirement. The OAN figure has since been increased to 919 units per annum. Additional strategic sites are in the process of being assessed to meet this higher need figure including this site and land to the south of Water Lane (outline planning application A/99/17/OUT).

The Development Plan policies are out of date and, until adopted, the emerging Local Plan can only be given very limited weight and be taken into account as a material consideration. Therefore, until the emerging Local Plan is adopted the principle of mixed use development at the site is not firmly established.

The NPPF has provided clear guidance on the issue of the weight that can be given to both the local plan and to emerging or made Neighbourhood Plans where the District Council cannot

demonstrate the 5 year housing land supply (HLS) of deliverable housing sites. The relevant policies for housing supply in the Arun Local Plan and the Angmering NP, including the village development boundary, should not be considered up-to-date.

Where the development plan is absent, silent or 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'.

Angmering has a range of services and amenities which suggests that this site to the north of Water Lane could be viewed as a sustainable location for housing. Many of the amenities and services, including convenience stores, local shops, community facilities and medical facilities are within a reasonable walking distance within the village centre. The primary schools and secondary school are also within the village; within walking and cycling distance of the site. There is a railway station approximately 2.5km from the southern boundary of the site but the Angmering NP notes that due to its location on the southern side of the A259, the station is not easily accessible by bus, foot or bicycle from many areas in Angmering. The ANP also says that access to bus services is poor.

Issues on Employment Land Provision will be provided separately.

The NPPF says that significant weight should be placed on the need to support economic growth through the planning system (paragraph 19). This needs to be balanced in any decision with the social and environmental aspects of sustainable development. The current status of the site as countryside outside the built-up area boundary of the Neighbourhood Plan needs to be accorded weight in line with paragraph 198 of the NPPF. When the emerging Local Plan is adopted there will be a conflict between the Local Plan and the Neighbourhood Plan. The National Planning Practice Guidance says that the decision maker should favour the policy that is contained in the most recent document to become part of the Development Plan. The NPPG also says that a neighbourhood plan should not be used to constrain the delivery of a strategic site allocated for development in the Local Plan. However, these arguments will only come into play once the Local Plan has been adopted.

It is considered that the site is in a sustainable location in relation to community infrastructure (schools, etc.). Providing there are no adverse impacts which would significantly outweigh the benefits of development in this location, then the site is acceptable in principle in accordance with the NPPF.

Summary

The proposal does not comply with the development plan but there are material considerations that would justify a recommendation to approve the principle of mixed use development (residential and employment) on this site as it would not be contrary to the core principle within the NPPF.

Design

Planning policies and Central Government advice support the efficient and effective use of land. Policy GEN7(i) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore, new development should be well integrated with and complement the local area in terms of layout, for example.

Emerging Policy EMP DM1 refers to a high standard of design and landscaping appropriate to the

context.

Policy H SP2 also requires the development proposals within the strategic site allocations must be comprehensively planned and should have regard to a masterplan endorsed by the Council which incorporates high quality imaginative design giving a sense of place and a permeable layout. Ideally this should be agreed before submission of an application. A design and access statement should be submitted with the application in order to demonstrate how it meets the high quality design aspirations. Policy SP2c goes on to refer to key design and infrastructure requirements for the development of Angmering North Strategic Allocation (site SD9).

The Angmering Neighbourhood Plan (NP), 2014 contains several policies relevant to design. Policy HD4 (Materials) of the ANP requires developments to reflect local materials and features evident in the surrounding area. The policy lists materials to be integrated into the design of the development (stock brick, flint, hanging clay tiles and pastel renders). It also refers to materials for paved surfaces (preference for permeable surfaces) and high quality street furniture.

Policy HD5 (Built Form) of the ANP seeks to ensure that new development reflects the character of Angmering. Of particular importance for this site is the integration with nearby development and the landscape setting. Policy HD6 (Housing Layout and Design) of the ANP also seeks high quality layouts and design. It is considered that the linear park running the length of the site is a positive design feature which provides safe walking, cycling and horse riding routes through the site.

It would be helpful if the applicant provided an analysis of the concept design in the Design and Access Statement setting out the thought process behind the masterplan for the site which comprises areas of greenspace, public open space, a linear park running through the site from north to south; and the fact that the site will be divided up into terraced blocks of housing that will be screened from existing hedgerows and hedgerow trees.

The site is essentially a cul-de-sac with vehicular access and egress from Water Lane to the south. Is there any possibility that two way vehicular access could be created from the western side of the site, and ensure that there are two accesses / egresses into and out of the site, serving both the housing and the business park? Could your transport consultants speak to the house builders who are currently developing the sites at Greenways and Merry England Nursery off Dapper Lane, which are located immediately south of the proposed bus access road (bus lane) along the western boundary of the Land North of Water Lane, in Angmering to acquire land to create a second vehicular access /egress to the site?

Policy HD7 (Housing Density) of the ANP seeks to ensure that the density of new development is in keeping with the surrounding area and should be complied with.

The Design and Access Statement should set out how the policies referred to above have been addressed by the proposed development. Policy D SP1 (Design) of the eALP specifies that development proposals should have been derived from a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness and usability, health and wellbeing and climate change); and the influence these objectives have on the form of the development. With large scale developments, in addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required. Aspects of form and design quality are all set out helpfully in Policy D DM1 of the eALP.

Providing that the relevant design and layout policies can be addressed satisfactorily, the proposed development is considered acceptable in design and layout terms.

Amenity Space Provision

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The NPPF says that good design should contribute positively to making places better for people and indicates that creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character. Policy GEN7 of the Arun Local Plan further indicates that development will be permitted provided that amongst other considerations the proposal creates attractive places and spaces with the needs of people in mind. On this basis, well designed and adequate amenity space provision for residents is considered essential to meet the policy requirements of the Local Plan, Angmering NP and Central Government advice. The provision of useable private amenity space in new residential development is covered in Policy D DM3 of the eALP.

Affordable Housing

Policy HD3 (Housing Mix) of the Angmering NP seeks to ensure that the mix of housing reflects local requirements and is encouraging the delivery of more smaller and fewer larger properties. This is reflected in the comments below from the ADC's Housing Strategy and Enabling Manager and also in emerging evidence to support the Local Plan:

Affordable Housing Policy requirements: The Council aims to ensure that 30% affordable housing is achieved on all new residential developments in the district where more than 15 units are proposed such as on this site. Based upon a proposal of up to 525 dwellings then 157 would need to be affordable to comply with the Council's current policy requirements.

Tenure: The tenure of the affordable housing is to be agreed with the Council but a split of 75% rented and 25% intermediate housing is initially sought.

Housing Need: There is high demand for affordable housing throughout the Arun District for both rent and low cost home ownership. As at July 2017 there were 1,228 households in housing need on the Council's housing register.

Property sizes design and mix: The applicants should ensure that the quantum of affordable housing is broadly delivered as follows:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate Homes	15-20%	50-55%	25-30%	0-5%
Affordable rented	35-40%	35-40%	15-20%	5-10%

The intermediate housing (shared ownership) dwellings should comprise of a mix of 1, 2 and 3 bed dwellings - 4 bed dwellings are not recommended for shared ownership purposes.

Integration - The affordable housing should be integrated into the overall development to form clusters of no more than 20 dwellings.

The affordable housing should be constructed and designed to be indistinguishable from the market housing.

S106 considerations and Affordable Housing Agreement: The Council would not support capped percentage transfer values to a provider of affordable housing being applied to the affordable housing dwellings.

The Council would request that the applicants engage with one of our preferred registered partners or an approved non registered partner for the acquisition of the affordable housing. Starter Homes have been assessed as not being affordable to most of those in housing need in the Arun area. At present therefore, the Council would not support the inclusion of Starter Homes

as an affordable housing product and would seek on-site affordable housing as described in this consultation response.

All of the necessary affordable housing requirements would need to be included in S106 planning obligation not secured by planning condition.

At present there are no details provided on the affordable housing provision so it is not possible to critique this specific aspect of the application.

Highways, Transport and Parking

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to accessibility of the site to public transport or services, or a location within a town centre. Some guidance is provided within Appendix 2 Parking Standards of the Arun District Local Plan. A separate pre-application advice service is provided by West Sussex County Council as the Local Highway Authority. The amount of parking and impact on the highway will be dependent on the mix of uses proposed. Provision should be made for the safe movement of pedestrians around the site through footways, crossing points and the use of different materials to demarcate the pedestrian routes.

The following policies in the Angmering NP should also be considered and addressed through the application:

TM1: Local Highways

TM2: Cycling, Walking and Equestrian.

Access

Vehicular access is to be taken off Water Lane by upgrading the existing Oval raceway junction, with a bus/emergency access to Dappers Lane it is assumed that this would also provide an emergency access. A small residential enclave also is accessed by a priority junction from Dappers Lane.

At the northern end of the site, the District Council would like to see the proposed development site linking in with the A27 underpass. At the southern end of the site the District Council would encourage the widening of Water Lane to the west of the proposed vehicular access to the site - which is in the applicant's ownership, as it width of the road is narrow at this point.

The site has been included within the modelling for the Arun Transport Study 2016 and within the planning application ref A/99/17/OUT Land South of Water Lane which is currently pending consideration. A number of schemes and funding requirements are established within the transport study associated with the local plan to mitigate the impacts of the development.

Sustainable Transport

Bus Service 9 provides an hourly link to Angmering railway station, Littlehampton, Worthing and Shoreham. At present the nearest bus stop to access the service would be on Merryfield Crescent however from the presence of a bus access from Dappers Lane, it would be of logical to consider if it could directly serve the development. Consideration should be given to the enhancement of frequency of the service and discussions take place with the operator Stagecoach.

A southbound bus gate is present at the northern end of Dappers Lane under the A27 Bridge towards Patching. It is thought that only a free shopper bus uses the gate for one journey on a Wednesday. Consideration should be given to closing the underpass to vehicles except in an emergency. This would provide an opportunity to enhance sustainable transport links to the north of the A27 and into the South Downs National Park.

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A pedestrian and cycling link to Dappers Lane and the southern site is promoted along Water Lane, in accordance with Policy TM2 of the ANP.

Improvements to Bridleway 2140, 2187 and 2188 should be investigated to improve the local network for residents of the development, in accordance with Policy TM2 of the ANP.

The Highway Authority would require the following documents to be submitted as part of any future application:

- A site location plan scale (1:1250) with site boundary indicated
- Schedule of existing uses including planning history with reference numbers
- Description, including site layout plans, of the proposed development and schedule of uses
- Summary of reasons supporting the site access/highways works proposals, including plan (scale 1:250 or similar) with achievable visibility splays indicated
- Design Audit of any proposed highway works, including plan identified departures from standards
- Final Stage 1 Road Safety Audit of site access and any proposed highway works, with designer's response and including amended plans.
- A Transport Assessment, including location plan of key services, availability of sustainable modes of transport and existing/future vehicular generation
- Reference to supporting national, regional, and local planning documents and policies
- Parking strategy, including provision of parking for all modes of transport
- Relevant data collected to date
- Proposed trip rates supported with TRICS outputs and site selection methodology
- Junction capacity assessment in accordance with the WSCC Transport Assessment Methodology

Sustainability

Government Planning policy is to encourage appropriate development in a location that will enable a reduction in the need to travel, particularly by private car and that planning should contribute to reduce emissions and reduce climatic change. Policy EMP DM2 of the emerging Local Plan requires a Travel Plan is submitted to demonstrate how the impacts of development can be mitigated and to bring about modal shift towards an increase in sustainable transport.

Sustainable Construction

Tackling climate change is a key government priority for the planning system. Applicants for planning permission should consider how well their proposals for development contribute to the Government's ambition of a low carbon economy and how well adapted they are for expected effects of climate change. Applicants should consider the provision of renewable energy in the form of high level insulation, rainwater harvesting, a general minimal energy use - including Carbon Dioxide reduction.

Policy HD6 (Housing Layout and Design) of the ANP includes strong support for development that seeks to meet the highest standards of construction Code for Sustainable Homes and BREEAM standards.

Infrastructure Provision

The Council will seek fair and reasonable contributions to be made by the landowner(s) or developer(s) towards the cost of infrastructure, service or amenity provision, to meet the needs of the occupiers or users of the development. The proposal would generate a requirement in the form of infrastructure provision for County education services, social services, fire service and public open space provision. Details of the required County service provision can be found on the

West Sussex County website. The proposal is likely to be acceptable subject to the completion of a Section 106 legal agreement.

Policy HD9 (Phasing of Residential Development) of the ANP seeks to make sure that new housing proposals demonstrate that there is the necessary capacity in the community and physical infrastructure and services are available to support the increase in population.

Policy CLW4 (Health Facilities) of the ANP seeks to ensure that new development makes adequate provision for the health needs of new occupiers either on or off site, the latter through a financial contribution. The current Infrastructure Delivery Plan (IDP) for the emerging Local Plan says that based on 700 dwellings coming forward to the north of Angmering (which includes Land to the North of Water Lane) any development at any of these sites will require expansion of re-provision of the facility.

A fully serviced education site was provided as part of the Bramley Green development and the ANP sets out that this is the preferred location for any new primary school. However, the IDP is indicating that a new 1FE primary school expandable to 2FE would be required in conjunction with Angmering South and East, as well as a 1FE to 2FE expansion to the secondary school.

In terms of nursery school places, contributions will be sought for 40 new nursery places to serve Angmering North and South.

As for sporting provision, contributions will be sought for 3G Pitch provision to serve new developments in east of District.

The emerging Transport Study for the Local Plan will also be identifying requirements for improvements in relation to the road network in the Angmering area, if the site identified as 'Angmering North' were to be allocated as a strategic site in the Local Plan. Any transport assessments to be submitted for this planning application will need to take into account the relevant findings of the Local Plan study to make sure that the application contributes to wider transport improvements that may be necessary to ensure that the impact of the development on the local road network is acceptable in isolation and in combination with other potential development in the area.

Neighbour Amenity

Arun District Local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land use or property. The NPPF further indicates that good design should contribute positively to making places better for people. One of the main considerations for this site is the potential visual and disturbance impact on Angmering, together with the existing hedgerows and tree cover that screen the site from the surrounding area. When more detailed designs are being developed, consideration should be given to the height of properties to ensure that overlooking and loss of light is not an issue. In this case, subject to details of layout and design, it is considered that the proposed development would be acceptable on the residential amenities of neighbouring properties.

Landscape Comments

Planning policies and Central Government advice emphasise that the conservation of the natural beauty of the landscape and the countryside should be given great weight in development control decisions.

The Council's Greenspace Officer has made the following comments:

Strategic development of this size will require detailed consultation with Arun District Council and a

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development brief to incorporate children's play, plus landscaped open space including a range of informal recreation opportunities plus formal pitch provision.

Developments are expected to provide open space on site in accordance with the Council's SPG guidelines, which apply to developments of houses and are based broadly upon the National Playing Fields Association's (NPFA) "Six Acre Standard". The superseded Fields in Trust guidelines (FIT) 'Beyond the Six Acre Standard' recommends that 3.2 hectares of open space are provided for every 1,000 people i.e. 32 square metres of open space per person. The new FIT standards would therefore suggest a requirement of 4.03Ha to be provided on site for the 525 residential unit element of this proposal. The employment land aspect of this proposal would also require open space more tailored for the usage of that facility. We would require confirmation of the areas of public open space being proposed with this development. The proposed indicative layout indicates a large band of open space to the north of the development and bisecting green linear park throughout the site with connection to ancient woodland buffer areas. This is good to see as it will create a green corridor connection throughout the development.

With the number of residential dwellings on this proposal being up to 525 this would trigger the need for on-site play. We would require confirmation of the areas of public open space being proposed with this development, as a minimum proportionate to the proposed dwellings. Provision of LAP, LEAP, NEAP and MUGA (Multi-Use Games Area) would be sought on site, with confirmation of play provision being provided to be submitted and approved.

The indicative layout has indicated locations for play, but no mention of where leisure and sports facilities could be sited. This provision would need to be flexible in order to allow for a greater variety in provision and in relation to evidenced based need.

A clear indication of the proposed future management of the open space must be set out. A clear directive of responsibility should be set out with this statement explaining how the differing typologies will be maintained i.e. responsibility of play and public realm areas. This is particularly important where a range of typologies and extent of open space is proposed.

The application must also refer to the following: Open space must be designed to include dog bins, litter bins, fencing and be gated and to prevent vehicular access except for maintenance. There must be no small unusable pockets of open space. Provision for interpretation ecological and historical features and management must be included.

Existing trees or vegetation that fall within the proposed or periphery of the development, may provide significant aesthetic impact to the location. Any trees in particular along the boundaries, which adjoin neighbouring properties could provide potential valuable screening and should be protected and retained. Any considered tree works within the site should be agreed with Arun District Council's Tree Officer. Further information concerning the existing hedges across the site and proposed TPO for worthy trees will need to be provided. A tree condition survey of the application site to be provided to highlight the importance of retaining particular trees along with the condition of existing hedgerows locally and their contribution to the landscape should be included. Root protection Areas (RPA) from the tree cover clearly seen to the periphery and in several locations of the site should extend into the development site. Before construction, a tree protection scheme must be in place for these adjacent trees whose root protection areas fall within the construction zone from neighbouring land. This would be required for both construction and heavy vehicle movements for deliveries. This should be in accordance with BS 5837:2012 'Trees in relation to construction'

There is a requirement for any scheme, in accordance with policy to be of High Quality Design, the nature and usage of this development should not compromise this requirement. The emerging landscape design aims should be:

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- * To design and implement a scheme that reflects and incorporates elements of its surroundings and enhances the atmosphere of local distinctiveness.
- * To create a visually pleasing and interesting landscape for owners, employees and visitors to the development.
- * To enhance the landscape quality of the site when viewed from the surrounding area.
- * To provide a planting scheme that includes native species to blend with the surrounding location, enhance biodiversity and create enhanced wildlife corridor opportunity.
- * To provide a sense of flow and cohesion between the different elements of the landscape, buildings, open areas and surrounding environment.

Forming part of the application, a full landscape scheme should be submitted for approval, detailing species choice, position, densities and size at time of planting. This should be plotted in plan and list form and in relation to the trees and vegetation to be retained so that a clear picture of the proposals can be seen. These details are required to ensure that appropriate screening is provided, maintaining and uncompromising the setting and ensuring that the proposals fit within the area of neighbouring properties, providing screening as required, whilst benefiting the potential of the proposed developments usage.

The use of a part of the POS for SUDS and integrated with the areas of POS are noted, however the full implication of the SUDS within the POS needs to be provided including its future management and maintenance. The recommendation that these are subject to RoSPA or similar organisation inspection should be noted. Indication must be provided as to whether these are likely to be wet or dry areas; this has implications where situated near to residents and play areas. Where they are to remain wet for long periods their safety in must be assessed regarding the close proximity to these large residential areas. Any such SUDS features including swales, wet balancing ponds, reed beds and wetland areas should be designed as beneficial wildlife, amenity and landscape features as incorporated as part of an open space or landscaping scheme for the development.

Wildlife and increased biodiversity areas along with ecological enhancements should be an intrinsic part of the plans and will provide additional new habitat. Measures to enhance biodiversity as part of the masterplan design should be made. Consideration should be given also to the integration of these with the development as a whole. All nature conservation features within the development site including existing habitats, watercourses and other features should be incorporated into the site design and protected from change.

It would be recommended that all of the above points are addressed and included as part of a considered application and agreed before any decision can be considered.

Archaeology

Archaeological remains are a fragile and finite resource. Permission will not be granted for development that would be harmful to archaeology on the site. As the site is over 0.5ha a Historic Environment Record Search needs to be undertaken and provided as part of the planning application submission and any identified heritage assets assessed in order to demonstrate that development would not be harmful to the archaeological interest of the site.

ADC's Archaeological Advisor has made the following comments:

Development of a site of this size in a location such as this should be accompanied by a desk-based assessment of its archaeological potential and a proposal to evaluate that potential by trial excavation. The latter, together with suitable measures to enable proper conservation (i.e. through sympathetic foundation design, full excavation and recording and/or preservation in-situ) could be secured through the application of a standard condition.

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The proposal is likely to be acceptable subject to appropriate conditions.

Loss of Agricultural Land

The presence of best and most versatile land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations when determining planning applications. The proposal would result in the loss of Grade 1 agricultural land and the requirements of draft Local Plan policy SO DM1 (Soils) should be addressed through the application submission.

Biodiversity

The NPPF and development plan policies indicate that developments should aim to maintain and enhance, restore and add to biodiversity and geological resources of the area.

The Council's Ecology Advisor has commented that due to the size and location of the development it is recommended that an extended phase one habitat survey is undertaken by a trained ecologist to determine the presence of protected species within the site and the impact a development would have on the surrounding environment. Following this survey, if any further surveys are recommended it would be a requirement that these are also undertaken and any mitigation required to be considered and the agreed measures should be included within the planning application.

Planning policies and planning policy statements seek to protect the environment and avoid damage to protected trees. BS 5837: 2005 sets out standards for Trees in Relation to construction. There are strong field boundaries on the site with hedges and significant trees including field Maples and Pedunculate Oaks, some of which are worthy of protection by means of a tree preservation order (TPO). There is an important woodland / copse abutting the eastern boundary of the site which will need to be fully respected. It would be good to see a layout which respects the strong landscape features and incorporates them as part of the open space provision such that they are not so close to the new houses that there is immediate 'pressure to prune or fell' as new owners take up residence.

The Council's Arboricultural Officer has emphasised that the applicant will need to observe BS 5837: 2012 recommendations where there are trees which might have an impact on the development proposals and vice versa that a full tree survey is undertaken and an Arboricultural Impact Assessment is prepared to include the Root Protection Areas (RPAs) of these trees and show this on a Tree Constraints Plan (including tree gradings and crown spreads) and then the report should detail how any potential adverse impact on the trees will be avoided and works undertaken outside of the RPAs and the shelter belt screens fenced-off with protective fencing.

Drainage Engineers Comments

The Council's Drainage Engineers have made the following comments in respect to surface water drainage:

A sustainable drainage system must be employed for the new development. The design should follow the hierarchy of preference for different types of surface water drainage systems as set out in Approved Document H of the Building Regulations and the SUDS Manual produced by CIRIA. The first option in this respect is to investigate the discharge of surface water to ground via infiltration.

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE 365, CIRIA R156 or a similar approved method and cater

for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 30% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location.

Any SuDS or soakaway design must include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design. Supplementary guidance notes are also enclosed for information.

There are known flooding issues in Angmering Village and therefore any drainage scheme needs careful consideration to ensure that the issues are not exacerbated. Betterment should be sought, where opportunities arise.

The presence of any existing watercourses, open or culverted (piped), either on or immediately adjacent the development site will need further discussion with ADC Engineers and a site meeting would be strongly advised in this respect. All watercourses will need protection, in terms of routing and future access, and improvements considered where appropriate.

Flooding

The NPPF requires development not to give rise to an unacceptable risk of flooding, detrimental to human health or property. There are requirements regarding the submission of a Flood Risk Assessment and Sequential Test documentation. The relevant requirements for these are dependent upon the designated flood zone that the site is located in. The Environment Agency website details designated flood zones. Policy EMP DM2 of the emerging Local Plan requires appropriate flood mitigation measures. It is understood that a Flood Risk Assessment has been carried out for this site, which includes the site to the South of Water Lane subject to outline planning application A/99/17/OUT.

Environmental Health Comments

Light pollution

Planning policies emphasise the need to consider the impact of light on neighbouring uses and the wider landscape, light levels should be the minimum required for security and working purposes, and minimise potential glare and spillage. The required lighting should be designed in order to minimise the effect on the rural character of the local landscape. The proposal is close to the South Downs National Park (SDNP), which was designated as an International Dark Night Skies reserve in May 2016. Whilst the proposal is outside the boundary, development in rural areas adjacent to the SDNP should minimise the light glare and spillage from the development.

Noise pollution

The NPPF and development plan policies emphasise that noise sensitive development will not be permitted if its users would be affected by noise by proposed noise generating uses. Emerging Local Plan Policy EMP DM1 includes a clause to ensure that any non-B class uses on the site are of a scale and nature so as not to generate levels of traffic, cause environmental impacts or involve noise sensitive uses that adversely affect the operations of B-class employment uses of the site.

Environmental Health would require information on noise, specifically an assessment of noise which may impact future residents. This would be expected to include noise from the A27 and A259. A document is attached which the applicant may find useful.

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An air quality assessment is likely to be needed.

Environmental Health now has a requirement that each home should have an Electric Vehicle charge point; as petrol and diesel cars and vans will not be sold beyond 2040, and to mitigate against any potential adverse impact of the development on local air quality.

Contamination

The NPPF and development plan policies emphasise that development on or in close proximity to hazardous sites or contaminated land will be permitted provided the Council is satisfied that appropriate remedial measures can be or have been undertaken in respect of human health and groundwater. Environmental Health has commented that there is a potential for contamination as the site includes an oval race track. Consequently, an environmental desk top study should be submitted with any application detailing all historical and current potentially contaminative uses of the land.

The proposal is likely to be acceptable in terms of contamination subject to a detailed environmental desk top study.

Bin Storage

For all new residential development the applicant must show bin storage / collection provision as follows:

Each unit should be provided with the equivalent of 240 litres of residual waste storage bins. For flats, the communal bulk bins can be used on the basis of 240 litres of residual waste storage/bin per flat. Alternatively, one 240 litre wheelie bin for each property could be provided.

Where bin stores are adjacent to the access road serving the development or across a parking area, there will need to be a road up to full highway standards and an indemnity provided for the Council's contractors to pass across servicing. The access of this type provided must be accessible / passable for collection schedules i.e. no parking or other obstruction(s).

The maximum pulling distances allowed under Health and Safety legislation are 10 metres for 1,100 litre bins and 50 metres for 240 litre bins.

It is recommended that if any communal provision is located near or adjacent to the highway, it will be suitably enclosed and landscaped so that the maximum pulling distances and vehicle access requirements are complied with.

Suggested External Consultees:

Archaeology Advisor

jkenny@chichester.gov.uk

Ecology Advisor

environmentalstrategy@chichester.gov.uk

Stephen.Gee@westsussex.gov.uk

Conclusion

Based on the above comments, I conclude that were an application for planning permission to be submitted prior to adoption of the Local Plan the scheme would be considered to be contrary to the development plan in that it is outside the built up area boundary identified in Policy HD1 of the Angmering Neighbourhood Plan. However, in determining the application weight would also need

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to be given to the following material considerations: the identification of the site as a strategic development site (for housing and employment) in the emerging Local Plan (Policy H SP2c); and the presumption in favour of sustainable development in the NPPF. This would also be combined with the significant weight that should be placed on the need to support economic growth through the planning system.

When the emerging Local Plan is adopted then Policies H SP2 and H SP2c will have full weight and will supersede the built up area boundary restriction in the Neighbourhood Plan. Therefore, if an application were to be received after the adoption of the Local Plan, it would be considered favourably provided that it meets the requirements of Policy H SP2, addresses the issues considered above and other relevant development plan policies and the NPPF.

Notwithstanding the above, the applicant will need to justify robustly why the site could only accommodate 3ha of employment land compared to the figure of 8.3ha identified in the employment allocation in the emerging Local Plan. The figure of 8.3ha of employment land for the site North of Water Lane was agreed with the Council's employment consultant. Further comment on employment land provision will follow.

Follow Up Meeting

If you require a further follow-up meeting to discuss this pre-application advice, you will need to forward a written request together with a fee for £200 made payable to Arun District Council.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will need to submit the following documentation/information with your application to meet the National Validation Requirements:

- Fully completed and signed Application Form with full description of the proposal.
- Ownership Certificate and Agricultural Land Declaration
- Design and Access Statement
- Correct Fee
- Location Plan (1:1250)
- Site / Block Plan (1:500)
- Elevations (Existing and Proposed)
- Floor Plans (Existing and Proposed)
- Roof Plans

Additionally the following documents will need to be provided to meet the Local Validation Requirements:

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked through the Local Validation Requirements List, I would suggest that the following additional documents will be required at outline planning stage:

- Affordable Housing Agreement
- Affordable Housing Statement
- Biodiversity Survey and Report
- Land Contamination Assessment
- Economic Development Statement
- Flood Risk Assessment

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Foul and Surface Water Drainage Statement
Land Engineering Works Statement
Landscaping Strategy
Landscape and Visual Impact Assessment (refer to Arun Local Plan Landscape Study)
Noise Statement
Planning Application Summary
Transport Assessment / Travel Plan
Tree Survey and Arboricultural Report
Heritage Statement

Bin Storage and Collection Provision (at Reserved Matters)
Lighting Assessment (at Reserved Matters)
Parking Plan (at Reserved Matters)
Street Scene (at Reserved Matters)

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely



Neil Crowther
Group Head of Planning

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