



Established 1894

Angmering Parish Council

The Corner House
The Square
Angmering
West Sussex BN16 4EA



23 May 2018

Michael Eastham,
Principal Planner
Arun District Council

Michael,

NORTH OF WATER LANE - A/40/18/OUT

It is appreciated that this site is a crucial element in the delivery of housing for the early years of the Arun District Council Local Plan, on the basis that it is for 525 dwellings out of 800 for the Angmering North Allocation. It is also true that application A/99/17/OUT South of Water Lane has still to be determined, is from the same developers Rydon/Gleeson Homes and is inextricably linked with the delivery of this site. It has always been the view that these two applications should be considered at the same time to enable the delivery of appropriate infrastructure resulting from them.

The matter of the Angmering North Allocation has been closely scrutinised by the Local Plan Inspector whose final report is not now due until sometime in July 2018, and this application should not be determined until the report has been received and absorbed and its full implications have been built into the final Plan document.

Angmering Parish Council made significant contributions to the Local Plan Inspection including representations prior to the hearings, which are reinforced in this planning response.

The Parish Council **OBJECTS** to this planning application for the following reasons:-

Flooding

The area upon which this application is being built is the source of the most recent flooding incident in the village in June 2012. There has been long-running correspondence on the precise nature of the flooding in the village, with the developers claiming that their development '.... will not make it worse'. This is not good enough.

There is an opportunity for the flooding problem to be resolved once and for all and there is no doubt that the site has the potential for further flooding, a walk to the highest point of Dappers Lane at any time of the year will demonstrate that water flows from the site. Indeed, the enclosed letter outlining the Water Level Monitoring – Winter 2017, dated 1st February 2018 from Idom Merebrook ends:-

'Based on information available to date, it does not appear that soakaways will be feasible on the development parcel due to the impermeable geology and relatively high water table, and it is considered likely that any surface water attenuation features will need to be lined. The indicative drainage strategy has taken these findings into account.'

This statement leaves a lot of questions unanswered, such as:

SOUTHERN WATER
Regional Rainfall

Rainfall per month (source Southern Water)			Depth to Water MBH103 (source IDOM Merebrook)
Month	Long Term Average	Actual Rainfall	metres
September 2017	68.2 mm	80.0 mm	0.72
October 2017	79.9 mm	31.9 mm	0.35
November 2017	85.7 mm	45.3 mm	0.42
December 2017	81.2 mm	121.3 mm	?
January 2018	80.1 mm	84.2 mm	0.35
February 2018	53.4 mm	48.7 mm	0.10
March 2018	62 mm	121 mm	?
April 2018	51.8 mm	75.7 mm	?

- September, October & November 2017 were relatively dry. By February the water table is almost at the surface and March and April were very wet which resulted in water flowing from the site onto the highway.
- What will happen to the attenuated water once it has collected?
- Who is going to maintain the 'attenuation features'?
- What does this say about the risk to others, because the NPPF requires this to be reduced if possible and certainly not increased?
- Why is the water on the highway (which causes village flooding) not CIL compliant?

Water will flow from this site and the village will be flooded again. We have a solution, the developer should contribute to this.

Employment

The draft Local Plan is supposed to have a golden thread running through it that it is not just about providing housing, but is also about the protection and provision of new employment sites. The first problem here is that the site contains the Oval Race Track, which currently employs a number of local people.

Additionally the original version of the Plan laudibly allocated a total of 8.3 Ha of this site as strategic employment land, a position that Angmering Parish Council fully supported. At the inspection, the District Council, despite pressure from the developers, supported this position and insisted that all of the land should remain allocated for employment.

Following the submission of this application however, it is apparent that the reduction to 3 Ha of employment land on this site is not even accurate. The layout presented for this application clearly shows that the 3 Hectares supposedly put aside for employment has been further reduced to '1.5 Ha Net', with the remaining 1.5 shown as a 'Swale' containing a 'Water Feature'. This is clearly part of the flood prevention element of the whole site, not just the employment site. It is therefore **deliberately misleading** to claim that there is 3 Ha for employment. The originally planned 8.3 Ha has effectively been reduced to 1.5.

This is not the only unacceptable matter here however in that Rydon Homes have stated that the 1.5 Ha being made available for employment can only be used for offices (A2) and not light industrial

(B2) purposes as there would be problems getting it accepted by the SDNPA. The argument appears to be that services industries in largely single-storey buildings cannot be landscape mitigated whilst two-storey office blocks can be. In truth, this argument is more about not having vans and lorries going alongside the new housing.

This proposal is not in line with either the letter or the spirit of the emerging Local Plan, which had identified this site as providing not just employment land for Arun, but also to satisfy the duty to cooperate with Worthing for employment provision. This did not involve a very small site providing the wrong sort of employment land (offices are over-supplied in the ADC area) for no good reason.

An additional comment made at a public meeting that even this small area 'would not prove to viable' indicated that decisions have already made that nothing will be provided.

This is clearly a case of Rydon/Gleeson Homes are **gaming the system** because there is no need for the precise nature of the employment land to be determined at the outline stage. The expectation will be that by the time a detailed planning application is put forward they will have promoted the possibility of office space, for which there is little demand, at which time it will be deemed as unwanted and unviable. They will then be able to put more houses on the little amount of employment land identified, achieving the original aim of providing no employment land.

Angmering Community Land Trust have offered to take the employment land on the site to provide a mixed use development for local people offering the possibility of all commercial use categories A & B to enable business relocation from elsewhere in the parish as detailed in previous planning submissions.

If ADC is serious in promoting employment provision alongside housing development, this application must be REFUSED on this aspect alone.

Landscape

The South Downs National Park Authority have expressed concerns about the South of Water Lane site and the effect on the setting of the Downs. This site has a greater scale than the south site, so the potential effect on the National Park is also greater. The planned build includes a number of 3 storey buildings that will be visible from the National Park and it is believed that this is unacceptable as it will be impossible to mitigate by just planting a few trees, whilst at the same time taking many existing trees out to obtain satisfactory access.

Schooling

The issue of Primary school provision has been the subject of a lot of discussion during the time between the Local Plan inspections and the submission of this application. It has been necessary to identify a potential location for the consequential 3 form-entry school in addition to raising the finance for its construction. Angmering Parish Council has been instrumental in making this a possibility, but there needs to be appropriate funding raised to relocate community facilities in addition.

Dappers Lane

The concerns about the urbanisation of Dappers Lane, which is currently a country lane offering access to the SDNP directly from the village. Despite what has been claimed, there will be a greater use of the lane making it dangerous for walkers and cyclists which are the current main users of the Lane. It is difficult to envisage how the bus access in to the site from Dappers Lane will be managed and closed to other traffic, not just now but in the future.

It should be remembered that the Lane is used by motorists to get onto the A27 & A280 travelling north, which already makes it dangerous at times.

Despite previous statements, there will be an access onto Dappers Lane from the separate development of 37 units, adjacent to the Broadlees site.

Affordable Housing

The provision of affordable housing on the site is being proposed at the ADC standard of 30% of the total. There was, however, no Affordable Housing Statement as indicated on the Planning Statement so detailed comment is not possible. The problem with all the so-called affordable units in the developments being built currently, is that although they are cut-price, they are still not affordable to local people. Angmering Community Land Trust will always discuss the provision of affordable units, for rent to local people.

Yours sincerely,

Rob Martin
Clerk to Angmering Parish Council