



Established 1894

Angmering Parish Council

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30 November 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 felt that application A/99/17/OUT for 175 dwellings South of Water Lane is inextricably linked with the delivery of this site. It has always been the view of the Parish Council that these two applications should have been considered at the same time to enable the delivery of appropriate infrastructure resulting from them.

The matter of the Angmering North Allocation was closely scrutinised by the Local Plan Inspector. He had a number of concerns over the proposals, which resulted in his (and the previous EiP inspector) making a number of modifications to Plan policies and objectives in order to make the Plan; and in particular the Angmering North allocation; sound. It is our view is that not all of them have been satisfactorily addressed in the two applications.

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

Flooding

The area upon which this application is proposed to be 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 sufficient evidence; as shown in **Appendix A**; that the site should have been included in the list of **Strategic** development sites submitted to be assessed by the **Arun Strategic Surface Water Management Study (PEPTP7)**, but it wasn't. There is no doubt that the site has the potential to increase the risk of further flooding.

This is an opportunity for the flooding problem to be resolved by working closely with the EA and engineers from Arun and WSCC to design an onsite water management solution as part of the design of the site layout across the Angmering North sites.

Indeed, the 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.

In his representation, a local resident commented that the applicant had rejected, prematurely, infiltration of surface water based upon very limited investigation and recommended that further investigation should be undertaken.

Much more recently (10 October 2018) your Council's own drainage engineer similarly commented; *"There is limited information regarding infiltration testing and groundwater monitoring to justify not using infiltration"*. The Parish Council concurs with this.

With the reported high ground water levels, it is surprising that shallow depth infiltration has not been investigated. We see that attenuation basins are proposed but with reported high groundwater levels and to ensure that storage capacity is available when needed, the IDOM Merebrook report says these basins will require waterproof linings (impermeable membranes possibly), which will need to resist the hydrostatic pressure associated with the high groundwater table.

Clearly your Council's drainage engineer must have raised this same issue in an email of 19th October 2018 to the planning consultant (which we have not seen) since the planning consultant's response of 24th October 2018 includes an assurance that they *"will ensure that the risk of flotation due to high groundwater levels and appropriate measures will be considered at the detailed design stage . . ."*

If the linings of these attenuation basins are not physically anchored to the ground to resist uplift any lining that resists uplift by self-weight will have to be massive.

Flood risk to others from development remains a paramount concern and the information provided appears to be wholly inadequate to demonstrate that this will not increase.

Employment

ADC Local Plan has clear policies regarding employment and what is clear from this application, is that the continued allocation of Housing (Totalling over 1500 units in Roundstone Lane and Water Lane combined) is driving our village into being a commuter/dormitory small town with no local jobs.

The failure of the last 40 years of housing development in Angmering is that not one square inch of new employment has been provided, while at the same time thousands of square metres of agriculture, horticulture and associated works have been bulldozed into expensive unaffordable houses NOT for local people, now sees thousands of cars every day on unsustainable transport routes plod around the A259 and A27 as they travel outside the district to employment.

This application destroys more local jobs which will not be replaced unless the correct facilities and category of employment land are allocated to the now substantially reduced employment land site.

The Parish Council totally rejects the principle that office accommodation should be the principle of the use of the employment land. Everyone (apart from the Developer it seems) knows that there is no demand for office space in Arun as there is already an oversupply. The primary need is for light industrial usage with small (including start up) units where small businesses can thrive. These units would help replace lost employment areas in the Dappers Lane/Water Lane area which is substantial when others are added to the employment area lost by this application.

The **Local Plan at para 8.6.13** agrees with the Parish Council's position. It says that although *"the site could potentially accommodate a range of employment uses, it would be particularly suitable for smaller scale activities to meet local or rural workspace needs"*.

Local Plan Policy EMP SP3 says:

"Development of site 7 at Angmering will need to be designed as part of the Strategic Housing 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;

Whether units are light industrial which are general high single floor units or two story office unit the mitigation for the landscape would be similar and therefore this is not a justification to use such an argument to predetermine the type of employment classification at this time.

It should be noted that the Developer rejected outright the proposal of the Parish Council that the access road to the employment area should not run along the south of the housing as proposed, and that a specific access to the industrial (our word) /employment area must be designed which at this stage would be easy to do. This would have given a separation between work and domestic vehicles.

By effectively tying the employment land to the houses the Developer will ensure that there is no take up of employment construction that the Parish needs and the developer will return in future time to propose building more houses on the employment area and that no construction can even start until this is achieved.

The Parish Council require that not only is this land safeguarded for employment use, but that a condition must be placed on any approval to keep open the type of employment that will be considered/allowed and that full consultation on the actual needs of employment should be the driver for a decision under reserved matters for the industrial classification.

Angmering Community Land Trust is a potential way forward 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.

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

Schooling

There are required primary school places for the future relating to the 800+ strategic houses in North Angmering of which this application is a major part. Due to the work of Angmering Parish Council land to accommodate this new school as a 2FE expandable to 3FE now appears feasible.

The work to deliver this potential site to WSCC is currently underway. However, this is the ONLY site that currently exists to meet the requirements. If obstacles prevent the use of this land and the developer (both South and North) have no alternative plan to deliver the land for the primary school, then this must be recognised as a major obstacle to the building of any of the strategic housing allocation.

We therefore require that in the event of any approval for this application, that a condition to both work with the relevant parties and to guarantee the delivery of the site (not the School) must be included and that no construction can even start until this is achieved.

In addition to the above the general principles of Safer Routes to School relating to primary and secondary pupils, sustainable transport routes to Angmering Secondary School, St Margarets Primary School and St. Wilfrids Primary School are inadequately addressed. The plan put forward on drawing I transport – Figure T9 which covers Walking and Cycling Connections Plan makes so many assumptions.

An example is the alleged Walking route to St Margarets which shows a total lack of local knowledge and promotes a route that no one will use. These routes include ways which have no footpaths and currently no plans to build adequate size (both width and length) footpaths, roads which are potholed and usually full of water, dangerous crossing points including a diagonal across a busy road near a bend. There is no evidence of any specific consultation with WSCC SRTS and the 3 existing schools on how children get to the schools and what the impact of these developments are on the school travel plans.

A clear undertaking to work with all parties to draw up what is actually required for the sustainable transport plan, must be a condition of any approval and this must include 100% funding from the developer for all works needed to achieve the agreed routes.

Health Care

The NHS Coastal West Sussex Clinical Commissioning Group responses to this and recent planning applications ALL say: *“CWS CCG predicts that most new residents will register at The **Coppice GP Surgery** [and Angmering Medical Centre], which is the nearest primary care site to this proposed development. This facility is of sound quality but the proposed new homes will not be able to be supported by this building as it stands. *** This is part of circa 1,500+ houses planned for the area of Angmering.*

*Additional population generated by this development will place an increased demand on the existing health care that provides services to the area. In the absence of developer contributions towards the provision of additional infrastructure, CWS CCG would be unable to retain the high level of health care that is provided in the area and would therefore have to **OBJECT** to the development proposal."*

The CWS CCG says that contribution from this application: *"will be used most likely towards the expansion of existing facilities noted above or where existing site constraints and/or building condition restrict further development CWS CCG seeks to include these necessary and additional works as part of a new integrated community hub facilities at a new site/expand existing site which will serve the catchment population of this proposed development."*

Surely we have the same issue here as with the proposed Primary School.

Funds are being requested from developments as S106 contributions towards additional Health Care infrastructure, but there is no certainty as to whether the Coppice and or the Angmering Medical Centre, can be expanded, or whether another site is available in *"the catchment population of this proposed development"*. Cllr Mrs Bower told the DCC that the Coppice GP Surgery in Angmering *"is so overcrowded that it is hardly coping with the burden it's got at the moment"*. This also applies to the Angmering Medical Centre.

The parish council believes that a Condition needs to be applied to all Angmering North sites, that a solution needs to be put in place, including increasing the numbers of medical staff, BEFORE any new development can be agreed or started in the catchment area.

Landscape

In their objection, the South Downs National Park Authority expressed concerns about the indicative lay-out proposed for the South of Water Lane site (A/99/17/OUT) and its *"unacceptable, negative impact on the setting of the south downs national park"*. As this site is on rising ground and of a much greater scale than the site to the south, the potential adverse impact on the setting of the national park is much greater.

The Parish Council wishes to reiterate its objection to a maximum ridge height of 12 meters at this location as proposed in the Parameter Plan. It is clearly not of a scale in keeping with the sites rural surroundings or the adjacent build form.

Policy HD5 "Build Form" of the Angmering NP says developments must properly demonstrate how they have considered the impact of the proposed build form on their surroundings. One of the reasons Officers gave for rejecting the original design of the proposed Care Home development in Roundstone Lane was that *"a ridge height between 11 and 12 meters was more akin to a 3 to 3.5 floor building"*. This same issue of inappropriate ridge height of a 2.5 storey building applies even more so to this application. Therefore, it fails to meet this policy.

This site will be "clearly visible" from all of the 5 key viewpoints identified in the Landscape Impact Assessment (PESP6) requested by the inspector. In particular from Highdown Hill.

Arun's Landscape Impact Assessment (**PESP6**) singles out Site 14, which sits at the base of the slope, as being clearly visible in the view. It recommends that development should be both lower in density and subject to a comprehensive planted mitigation strategy. It also says that consideration should be given to the design of the buildings as the larger roofs are more difficult to mitigate.

When assessing scale and building heights, **Policy D DM1(14)** of the Local Plan says: *"the scale of development should be kept within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement"*. No such

evidence has been provided to justify why a maximum ridge height of 12 meters specified in the Parameters Plan, “*would bring a substantial visual improvement*” in this location. Therefore, it fails to comply with this Policy.

In his final report, the inspector reminds Arun that: “**Policy LAN DM1** provides safeguards but there is a need for more prescriptive requirements in relation to assessment of landscape impact and mitigation to ensure that **Policy H SP2c** is positively prepared and consistent with national policy.” Currently, the illustrative Parameters Plan and Site Lay-out Plan that support the application do not provide any evidence of this. Therefore, they fail to meet these policies.

In summary, the application as it stands fails to meet a number of Development Plan Policies, including one of the key Strategic Objectives of the Local Plan: “*To protect and enhance Arun’s outstanding landscape, countryside, coastline, historic, built and archaeological environment, as well as the setting of the South Downs National Park, therefore reinforcing local character and identity.*”

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.

Water Lane

It is concerning that minutes of the DCC meeting that approved (A/99/17/OUT) says: “*Mr Gee from West Sussex Highways advised that a road safety audit and transport assessment had been undertaken and there were no issues with Water Lane at the moment.*”

So, no issues “*at the moment*”, but what about the impact on Water Lane from the additional 525 dwellings and employment site? The statement from WSCC as minuted appears to be a reflection of the view the Chair and our Ward Councillors expressed on the “no issues” conclusion WSCC reached on the perceived road safety issues from the South of Water Lane 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.

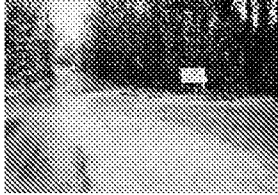
Yours sincerely,


Katie Herr

Clerk to Angmering Parish Council

Angmering Flooding Events shown on Arun's SFRA 2016 (PEPTP10) Surface Water Flood Risk Map

A: Surface water run-off Dappers Lane



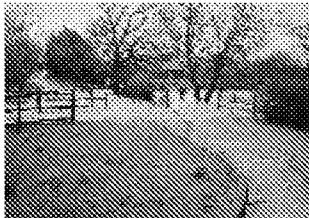
B: Surface water run-off Dappers Lane



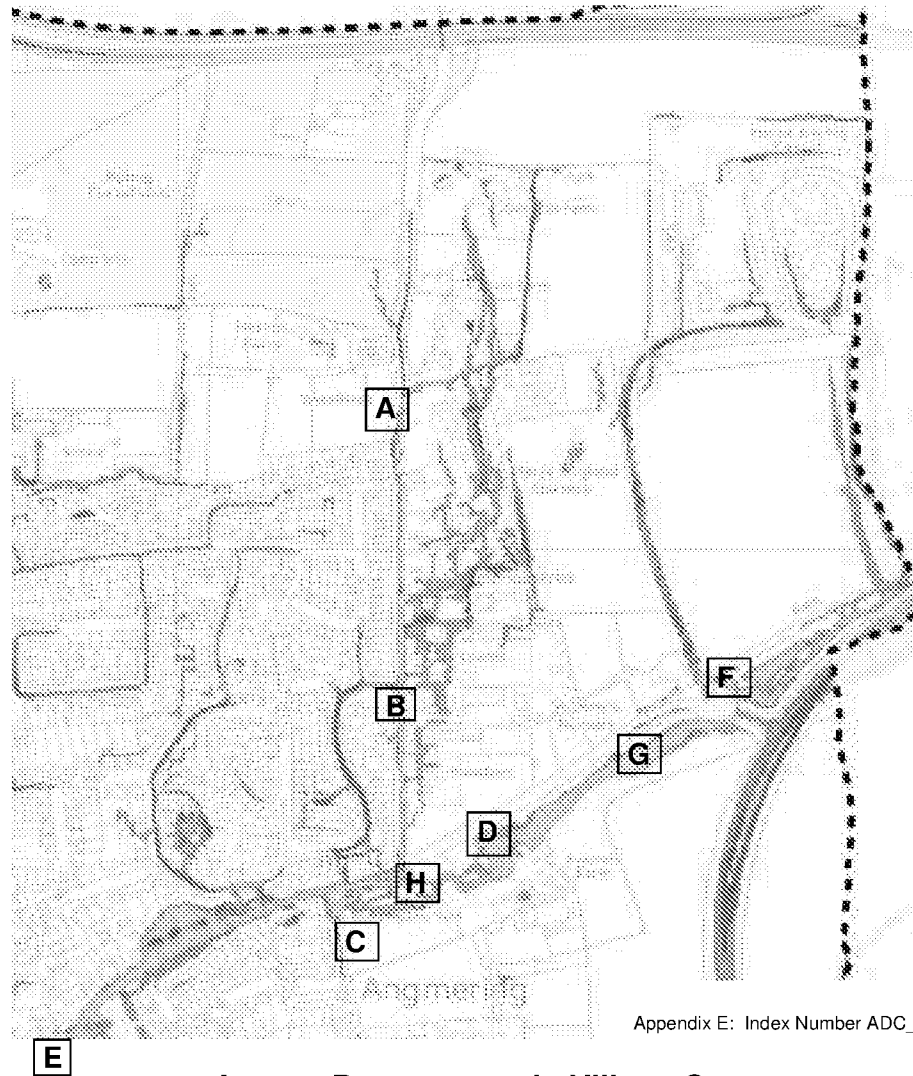
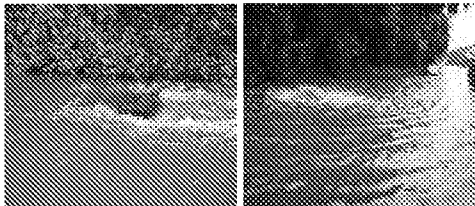
C: Surface water run-off. Onto Weavers Hill from land to the east, south of junction with Water Lane.



D: Avenals Farm entrance to Water Lane



E: Black Ditch culvert manhole Water Lane

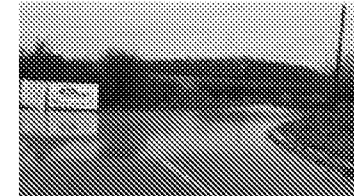


Appendix E: Index Number ADC_38

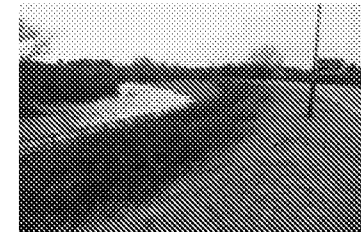
Flood risk is concentrated where there has already been development i.e. east of Dappers Lane and the Race Track, as well as along footpaths.

What impact will the Angmering North strategic development; on top of the recently approved applications along Dappers Lane; have on Arun's 2016 predictions of the impact of future groundwater emergence/surface water run off in the area?

F: Surface Water run off at the entrance south of Race Track



G: Black Ditch south of Water Lane



H: Water Lane looking south. Surface water run-off from Dappers Lane and Weavers Hill



Impact Downstream in Village Centre

