

No More Large-Scale Housing Developments

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25th September, 2012

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

Dear Mr Meecham,

Planning Application A/82/12

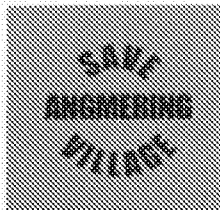
I write on behalf of Save Angmering Village (SAV) to **OBJECT** to the above planning application by Barratt David Wilson (Southampton) Ltd, to build 150 houses on land to the east of Roundstone Lane in Angmering. SAV is funded by voluntary contributions from villagers.

While SAV accept the need for some new houses to be built in the village, any new development must be proportionate and appropriate.

In support of our objection, I enclose two technical reports by Rodway Planning Consultancy and LGPS Resources, who were commissioned by SAV to provide an independent, expert assessment of the proposed development, against Government and Local guidelines and policies, as well as other supporting evidence. SAV believes that findings in these documents provide comprehensive grounds for the rejection of this planning application by Arun District Council.

Following the Public Consultations held by Barratt in Angmering Parish Hall in April 2012, this application shows a reduction in the original number of houses proposed, from 301 to 150. As a result, it now includes only the Greenfield element of the original site. However, the application and supporting statements still do not address specific infrastructure, traffic, school places, landscape and other issues that were raised to Barratt by residents who attended these consultations. These remain as relevant to the building of 150 new houses, as they were to the original 301.

1. It is entirely inappropriate to build houses on Grade 1 agricultural land outside the built-up area in Angmering when there are suitable Brownfield sites in the village. Building on any land east of Roundstone Lane is contrary to all Government and Local Policy as expressed in planning guidance and in the emerging Local and Neighbourhood Plans, and in direct conflict with saved



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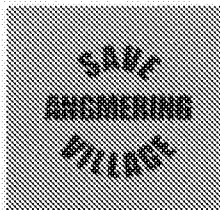
Planning Policies. The applicant has not provided any justification for building on Countryside, instead of a Brownfield site.

2. **The building of a 150+ housing estate would be directly contrary to the expressed opinion of Angmering residents.** Following Barratts' consultation, SAV invited villagers to vote in a poll. Nearly 40% responded. Of these, 99% opposed the development. In a subsequent poll carried out by Angmering Parish Council for the emerging Neighbourhood Plan, 75% of the 40% of villagers who responded opposed any development of more than 100 houses in Angmering. To approve this application, would therefore fly in the face of the intention of the Localism Bill, in that local people should be able to determine the shape of their environment. This policy aim was endorsed in January 2012 by the Prime Minister, when he said:

"I care deeply about our countryside and environment. Our vision is one where we give communities much more say, much more control. The fear people have in villages is the great big housing estate being plonked down from above."

"Our reforms will make it easier for communities to say 'we are not going to have big plonking housing estate landing next to the village, but we would like 10, 20, 30 extra houses and we would like them built in this way, to be built for local people'."

3. **The proposed development would further erode the character of Angmering village.** Developments such as Bramley Green (approx. 650 houses), which have contributed to a population growth of 35% since 2001; have already stretched village infrastructure and services to breaking point. The village is being reduced to an unsustainable dormitory town. Moreover, we know from the "Rural Community Profile for Angmering" compiled by Action with Communities in Rural England (ACRE), that no natural growth is predicted for Angmering, and no studies we are aware of have suggested any significant local need for more housing. The character of the village is being sacrificed to accommodate inward migration, mostly from outside the district. The principal cause of this is the South East Plan which the government is in the process of withdrawing, and which will reduce Angmering's new housing target to 100 within the Plan period.
4. **Protecting the Rural-Urban Fringe:** Roundstone Lane marks the natural settlement boundary to the east of Angmering, with Bramley Green marking the extreme point at which housing development can be sensibly regarded as sustainable. The strip of land to the east of Roundstone Lane, provides the landscape interface between the village and the countryside, and is an important "buffer" between existing housing, the by-pass and the South Down National Park. Cumulatively, the mixture of horticultural, sports facilities, garden centres, agriculture and Greenfield sites, provides approximately 120+ local jobs and defines Angmering's setting and character. These attributes are acknowledged in the emerging Local Plan, which does not allocate this area for housing, but under Policies DM 25 & DM 1 looks to protect and enhance this amenity for the local community.



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5. **The applicant has not provided any evidence to support the need for, nor the sustainability of, the proposed development.** The site is not well located in terms of accessibility, having poor pedestrian and cycle links to shops, employment centres, schools etc. There are no jobs in Angmering, primary schools are already full. The site is over 1 mile from Angmering railway station and there is a poor bus service. This will result in a high dependence on the private car. In the absence of any proposals to provide new or improved infrastructure or public transport a service, the proposal does not represent a sustainable form of development.
6. **This development will damage the quality of life of existing villagers** by increasing the pressure on our already overstretched roads, schools, doctors' surgery, drainage and sewerage and other infrastructure without providing any solution to the existing known problems. The addition of 150 houses in this location would result in an unacceptable increase in vehicle movements on Roundstone Lane onto the A259, and also through High Street, Weavers Hill, Water Lane and Downs Way. All of which are used as "rat-runs", particularly in rush hour, as a result of the building of Bramley Green without upgrading existing infrastructure. The residents of Downs Way already suffer from overflow parking from commuters driving to Angmering Station, and commuters using it as a cut-through, trying to avoid the bottleneck on the A259.
7. **Groundwater and surface water flooding is a real risk to the village.** In our view, the applicants have failed to demonstrate that the development will not result in an increased flood risk to existing properties. There also needs to be an assessment of existing sewerage infrastructure to confirm whether it has the capacity to cope with these new houses.

In summary, SAV believe that Barratt David Wilson (Southampton) Ltd's proposed housing development is clearly unsustainable, does not support any demonstrable housing need (either in the village of Angmering, or in the immediate local area), has issues of landscape sensitivity, and removes the opportunity identified in the emerging Local Plan to enhance the strip of land east of Roundstone Lane to the benefit of the local community. As such, it is SAV's view that this application should be rejected.

Other Considerations

SAV also believes that there are wider implications if this application is approved.

Whilst we understand that each planning application has to be assessed on its own merits, this application cannot be looked at in isolation. There is every expectation that the actual number of houses that will be built to the east of Roundstone lane will be significantly higher than 150. There is a clue in the submitted "Planning Statement", that *"the site could contribute to a sustainable mixed community"* and that *"the layout has been designed to allow linkage to adjoining sites should they come forward for development at a later date"*.

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861.

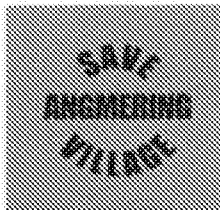
2. The second part is a report from the Secretary of the Interior, dated January 1, 1861, regarding the land claims of the State of Texas.

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We are aware that Arun District Council has already been approached by developers for preliminary discussions about building houses on the Rugby Club and VHB sites, and will be expecting to receive planning applications in the near future. The first of these, Barton Wilmore - developers for West End Nursery (the VHB site) have already booked two Public Consultations for Saturday 13th October (Angmering Village Hall) and Saturday 27th October (Angmering Community Centre).

Approving this application, which appears to be speculative in its timing in relation to the emerging Local and Neighbourhood Plan, and lacking in supporting evidence as to why it should be considered as meeting local need, sustainability, infrastructure, etc. would set a dangerous precedent to applications that will follow.

SAV respectfully ask that Arun District Council take all of the above comments into account when considering this application.

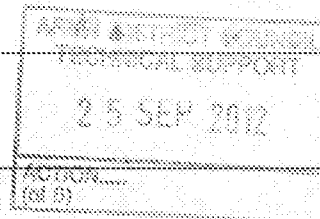
Yours sincerely

Sue Ware
SAV (Save Angmering Village) Co-Founder SAV

Encl.

Technical Note No.1

Job Title Proposed Development At Roundstone Lane, Angmering
Job Code SAV/RL/DWH



Date 17/09/2012

Subject Highway Matters – Planning Application A/82/12 – Arun District Council
Preliminary Note to the Save Angmering Village Group

1.0 INTRODUCTION

- 1.1 Save Angmering Village (SAV) was formed to consider development proposals in Angmering and comment on appropriateness and suitability in relation to the village. SAV has commissioned LGPS Resources to assist in the consideration of highway related technical aspects of the planning application A/82/12.
- 1.2 This assistance is being led by David Bell. David has been engaged in road safety, traffic management, highway engineering and development engineering for over 30 years. Prior to entering the private sector in 1994 he was a local authority Chief Engineer and, along with other responsibilities, advised Planning and Highway Committees on the suitability of planning applications from a highway authority point of view. He has extensive knowledge and practical experience of road safety, highways and calming traffic. David has been involved in significant initiatives for Government Office such as the project management of and technical advice for the "Safe Routes to School Pilot Project" and the design, monitoring and evaluation of the first approved road humps and alternative measures traffic calming on a public highway in the UK on behalf of the Department.
- 1.3 We have attended two meetings with SAV, at which likely development proposals were discussed, and been able to observe conditions on the local highway network over a reasonable period of time as a result of this commission and other work in the area.
- 1.4 We have supervised the collection of check count traffic data for some movements. This has been undertaken by manual counts including registration plate surveys in order to test the volume of traffic currently going through Angmering instead of using the bypass. The data will allow us to make informed assumptions about and comment on the Transport Assessment.
- 1.5 We have now been able to have a preliminary look at the planning application and our initial comments on the highway matters follow in this Technical Note. This note will be written, whenever possible, in a non-technical style. At this stage, we will address matters as they arise in the Transport Assessment (TA).

2.0 GENERAL COMMENTS ON THE CEP TRANSPORT ASSESSMENT NON TECHNICAL SUMMARY

- 2.1 The CEP TA report refers to the A259 single lane carriageway adjacent to Angmering and notes that it experiences peak time congestion. Further comments suggest that the A259 has sufficient lane capacity to accommodate the current flow and the additional proposed development traffic.
- 2.2 We have observed the A259 in the vicinity of Angmering in the a.m. and p.m. peaks and would agree that it experiences peak time congestion. From our observations, the a.m. peak appears to experience more severe congestion and it is not uncommon for the east bound traffic to back up from the A259/A280 (bypass) roundabout and significantly affect the operation of the roundabout at the A259/B2225 (Roundstone Lane). This matter will be covered in more detail later in this note.
- 2.3 Comment is made about the existing traffic calming in the village centre and perceived (by residents) capacity problems. We have not yet determined whether or not this is a perceived capacity problem or a perceived volume problem. Based upon observations, we do not agree with CEP that there are no problems. The registration plate surveys show, using entry at A280/Water Lane junction and exit at A259/Station Road as an example, there are in the region of 28% of the total flow as through trips in the a.m. peak and 34% in the p.m. peak. In the absence of an appropriate explanation, we consider these to be high percentages considering the village has a bypass. We will comment further later in this note.
- 2.4 It is stated that "a residential Travel Plan will provide sustainable travel information and incentives to the new residents of the development". At this stage in this note we have not looked at the Travel Plan (TP) in detail but, given the location of the development – not adjoining or in a town centre, our reaction is that a large modal shift from the private car is unlikely given the cost of rail travel and the remoteness from the larger employment centres. We would, therefore, expect the TA to assess the likely highway impact of the development based on robust private car travel related figures. We will comment further on the Travel Plan later in this note.

3.0 LOCAL TRANSPORT POLICY CONTEXT

- 3.1 We will not spend too long commenting on national policy, Manual for Streets (MfS), Localism Act, Regional and Local Plans/LDF, SHLAA, etc. The common threads are to enable the provision of housing (where appropriate) with safe access and layouts, mitigate the impact of development on the highway network and promote sustainable travel. Being able to achieve this is easier said than done. In this case, 150 units are proposed but there is every expectation that the actual amount to be proposed in the area will be significantly higher and that the development of the area is being approached on a piecemeal basis.
- 3.2 Generally, emphasis is placed upon walking and cycling as alternative forms of local travel. In order to test each development it is necessary to ask whether or not the site is actually within a

walking distance where the journey encourages safe and comfortable walking with similar consideration for cycle trips. We will comment further later in this note.

- 3.3 If the private car is likely to be the favoured mode by new residents then how can we look to mitigate the impact based on reasonable measures? To do otherwise is likely to lead to deterioration in the quality of life and the environment for the existing residents. In this case (150 units), it may be necessary to accept short-term that there is disruption on the local highway network and that little can effectively be done now for 150 units that is not a "promise for the future" – in other words, a financial contribution to a larger A259 highway scheme. However, other minor works or small scheme design and construction works can also be considered in addition to a financial contribution to a larger highway scheme or schemes. Such works could include, for example, facilitating or providing peak hour control measures at the A259 roundabouts.
- 3.4 Demand management and the regulation of flows through the village do not seem to be effective. In this case, the vertical traffic calming seems to have little or no effect on vehicle speed. For example, at Roundstone Lane speeds well in excess of those intended and the speed limit cause concern. The percentage of through traffic also seems high for a village with a bypass. These are significant challenges for the Highway Authority (HA). In assessing this (and other local proposals) the HA and Planning Authority must be unrelenting and, whilst considering each application on merit, be working toward an objective that does not simply exacerbate the existing situation.
- 3.5 Sitting alongside the policy (national or local) are the practical considerations of each site or proposal. For example, this site is outside the settlement boundary and, technically, we presume there should be a planning policy refusal for the site. Much thought will have gone into why there should be a settlement boundary and the facilities needed to support the local population. Facilities include not only education, shops and leisure but also the local highway network, access to employment and the like.
- 3.6 Reference has been made to the SHLAA work undertaken and that this site was identified as part of site 80. Our experience is that when the detailed work of the application transport assessment is undertaken we find that not all sites identified in a SHLAA are capable of development without considerable highway mitigation.
- 3.7 Whilst it is necessary, in general policies, to use caveats such as "where appropriate" it is clear that any development proposal should mitigate identified impact. Where future development is identified and implemented in stages it may be appropriate for the HA to take a view and, if necessary, a contribution to a larger solution. We understand from policy that WSCC and Arun are committed to looking at opportunities (through new development) to improve access along the A259 including improvements that will achieve better bus journey times. Clearly, this is intended to address congestion and delay along, on to and from the A259. Additional residential development on green field sites and other existing low generation sites can only exacerbate the local highway conditions if steps are not taken to plan ahead.

2025

The first of the year was a very busy one. I had to go to the bank to get some money and then to the post office to get some stamps. I also had to go to the grocery store to get some food. I was very tired when I got home, but I was happy to be home.

I had a very good day. I went to the bank and got some money. I also went to the post office and got some stamps. I was very happy to be home.

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4.0 ANGMERING AND THE SURROUNDING AREA

4.1 Local services and amenities are listed in the CEP report and it is accepted that employment opportunities within Angmering are limited. The main employment areas are expected to be in surrounding towns such as Littlehampton, Worthing, Bognor Regis, Chichester and the Brighton/Hove/Shoreham by Sea areas.

4.2 Clearly, there is likely to be significant travel by private motor car. It is not clear, at that stage in their report, how CEP envisages travel to each of these destinations.

4.3 The site is described as 6.8ha and agricultural fields. We agree that there are no traffic credits appropriate for the site.

5.0 ACCESSIBILITY AND LOCAL TRANSPORT INFRASTRUCTURE

5.1 This section of the TA describes the existing facilities and conditions relating to pedestrians and cyclists. Local facilities are considered to be within a short walk of the site but we consider more investigation and information is necessary if it is to be proven beyond reasonable doubt that the prospective occupiers at the site will not travel to the central facilities (or be dropped off at the station) by private motor car mode. Our assumption at the moment is that the private motor car will be used from this location which will not only increase local traffic but also place more pressure on car parking space within the central village area.

5.2 Whilst pedestrian and cycle facilities exist, the appropriate question is why (by observation) do they not attract more pedestrian and cycle trips? What can be done to improve access by these modes? Paragraph 3.7 of this note highlights that the local authorities have commitment to achieve A259 access improvements through new development opportunities. It would, therefore, be appropriate to expect new development proposals to investigate and provide or contribute to any identified measures.

5.3 Public access by buses is an important consideration for the local authorities – paragraph 3.7 of this note refers.

5.4 Bus services listed as servicing the site are based on the 9 and 700. We agree that the 700 Coastliner is a good route with frequent services but the 9 service is limited. It is not clear how more effective, increased use could be promoted – for example, via the travel plan. Can stops be improved? For example, the stop shown in the photograph in the CEP report is a simple pole and sign. Would a shelter improve conditions and encourage use? For this site, on the edge of a village, it would be appropriate to consider such matters.

5.5 The local highway network works well for the majority of the day. However, we have significant reservations about operation in the peak hours – particularly the morning peak. Observations and traffic counts/registration plate surveys show:

Agree to pay the sum of \$100.00 to the City of New York, New York, for the purpose of the purchase of the property described in the foregoing description of the property.

Witness my hand and the seal of the City of New York, New York, this 10th day of May, 1964.

Mayor of the City of New York, New York

City of New York, New York

County of New York, New York

State of New York, New York

Notary Public in and for the State of New York, New York

My Commission Expires on the 10th day of May, 1965

Notary Public in and for the State of New York, New York

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- ❖ Approximately 30% of the traffic from Water Lane to A259/Station Road in any peak is likely to be through traffic.
 - ❖ We have observed traffic queues for the right turn A280 into Angmering that fill the right turn bay and result in some motorists going beyond the right turn in order to do a "U-turn" on the A280. This is not to be recommended and is a road safety hazard. At very busy periods (and exacerbated by the traffic calming) queues have been observed to build up from the first calming and cross the bypass.
 - ❖ In general, the queues observed during site visits have exceeded those predicted in the TA. This is of particular concern at A280/Water Lane, as detailed above, but also the junctions of A259/A280 and A259/Roundstone Lane. Traffic queues have been observed to be significant enough to compromise at least the effective working of the A259/Roundstone Lane roundabout which is promoted as the main access. We will comment further on this later in this note.
- 5.6 General comments are made about the accessibility at the access and around the site layout for emergency vehicle access and large removal vehicles. It is hoped that these movements will be minimal; however the refuse freighter will be a regular movement.
- 5.7 We have looked at the application supporting data and recommend that the tracking should demonstrate that the access and layout will accommodate a larger refuse freighter, as indicated below. The need to be more sustainable and more economical leads to larger collection vehicles on larger rounds. Some local authorities we work with have gone to 4-axle, double-axle steer and approximately 11.4m in length. The vehicle used in the supporting information is a Phoenix 2 of 10.98m length but having checked with the local authority they have confirmed that an 11.4m (3-axle) vehicle is used. We note the following from the drawing:
- ❖ The refuse freighter (even at 10.98m in length) crosses into the opposite traffic lane both to enter and leave the site at the Roundstone Lane access junction. This could have road safety implications and should be designed out.
 - ❖ In the site layout turning head tracking inspected, the freighter appears to utilise the whole area and overhang the footway or service margin. Clearly, if it overhangs a footway to the extent shown there is the possibility that a pedestrian (especially a child) may not be seen and may be hit. In at least one case the tracking steering axle wheel appears to run up on to the kerbs. We recommend that, for road safety reasons, the layout should be re-tracked with a larger refuse freighter and that the tracking is entirely within the carriageway area and does not utilise the footway/service margin areas.
- 5.8 Contrary to CEP Report paragraphs in Section 5, with regard to the effects of the calming in Roundstone Lane, we are far from convinced that it regulates vehicle speed to the desired extent. The Road Safety Audit Team appears to concur. Our observations and the measured speed checks in excess of 30mph lead us to question whether or not a raised table at the access will mitigate the impact of an additional junction and reinforce the existing calming to a sufficient extent. Bearing in mind the imposition of another 150 units in the area we

recommend that the calming in Roundstone Lane is reconsidered rather than just "finkered with". Other measures may be necessary. The issue needs to be thought through and demonstrated, along with supporting information, to the satisfaction of the HA.

5.9 Paragraph 5.8.1 and 5.8.2 of the CEP TA Report. We are not surprised that Stagecoach is, at this stage, against diverting through Angmering. In our view, the 700 is best left on the A259 as it is a more strategic service and other measures implemented to increase use. These are likely to be more than just those suggested in the Travel Plan.

5.10 We are not convinced that the 9 service will see an increase in passengers as a result of this development proposal. The Travel Plan and robust measures including significant, long term incentives are likely to be the key. However, why not divert the 9 service into the site on the circular route? There is more incentive this way (because the stops are near to home) and if the stops are in position before occupation there are likely to be less teething problems for the HA.

6.0 DEVELOPMENT TRAVEL DEMAND

6.1 In general, we do not consider the TRICS data provided to be representative of this area. In order to make, in our view, robust predictions we have undertaken check surveys in the local area. Due to the timing of the application, our surveys had to be undertaken in the very early transition from school holiday period to school term time. By observation and experience we would expect our figures to be on the low side rather than high.

6.2 We have spoken about trip rates and use in our meetings. For the a.m. peak survey we would recommend the following local trip rates for a robust analysis:

In 0.2

Out 0.6

Although the evening peak is spread across a longer time period, we would recommend (for robust analysis) that the trip rates are reversed, i.e. In at 0.6 and 0.2 Out.

6.3 The CEP TA Report uses the following trip rates (prior to adjustment):
(Vehicle number in brackets)

A.M. Peak		P.M. Peak	
In	0.164 (25)	In	0.432 (66)
Out	0.440 (65)	Out	0.268 (40)

6.4 The CEP TA Report then goes on to adjust these figures by means of census data, with the following results:

Predicted Vehicle Movements Only

A.M. Peak		P.M. Peak	
In	29	In	71
Out	101	Out	45

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- 6.5 The new weekday daily trips on the network are predicted in the report (by reference to census data) to be 1,013.

In order to test this census data we have estimated the number of trips per unit type as below:

Average Daily Trips (new on the network) from the development can be calculated as follows:

Predicted Daily Additional Flows On Network (150 Proposed Units)			
Predicted Flows	No. of Units	Trips per Unit	Total
One-bed unit	1	5	5
Two-bed units at max.	24	6	144
Three-bed units	70	7	490
Four-bed units	45	8	360
Five-bed unit	10	8	80
Total Additional Trips Spread Across The Day	150		1,079

It can be seen that there is a difference of about 6% (66 trips) between the census data and typical southern daily trip estimation based on the number of bedrooms in a unit.

We have compared, as a check, predicted pedestrian movements in the a.m. peak.

Pedestrians by TRICS (150 Units)	Pedestrians by Census (150 Units)
Predicted Pedestrian Movements Only	Predicted Pedestrian Movements Only
A.M. Peak	A.M. Peak
In 8	In 3
Out 36	Out 12

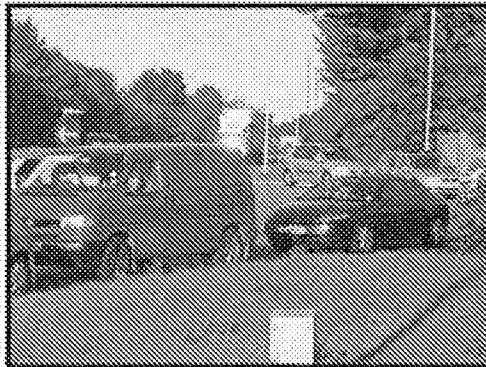
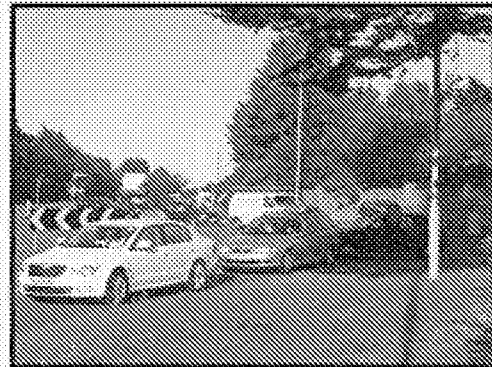
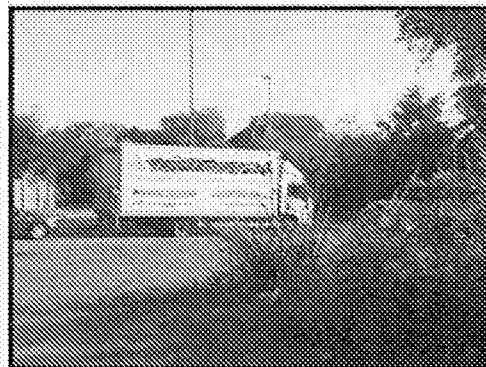
Pedestrian Movements Prediction By Check Survey (150 Units)
A.M. Peak
In 3
Out 6

It can be seen that there is, as we would expect, a greater degree of agreement between the census data and our survey of existing conditions. This indicates that the TRICS data is very optimistic and does not augur well if used for Travel Plan predictions and overall assessment of travel modes.

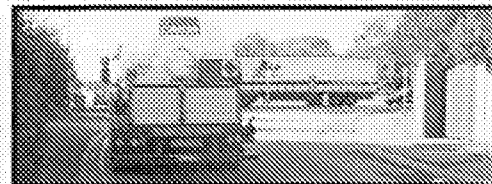
We conclude that it would be reasonable to use the census based trips as a robust case for modelling on the local highway network.

Overall Highway Capacity and Modelling

- 6.6 We have not been commissioned to develop and run traffic models. Our role is to assess the suitability and appropriateness of the modelling produced for the application. The most appropriate test to use in this case is to assess whether or not the modelling represents the existing situation and is, therefore, likely to represent the predicted situation.
- 6.7 We have compared the assessments with the actual, observed conditions on-site and conclude that observations show that the modelling output is not consistent with on-site conditions and in particular, the impact of the existing queuing is not represented.
- 6.8 We have noted significant queuing on the A259 eastbound in the morning peak. The tailbacks from the A259/A280 roundabout affect the operation of the A259/Roundstone Lane roundabout and beyond.



Queues Blocking The Roundstone Lane Entry



- 6.9 The CEP TA report suggests that this roundabout is "within capacity" at peak times now and with the proposed development additional traffic. The TA model opening year increases in queues and delays caused by the proposed development are claimed to be "minimal".
- 6.10 We conclude that the TA model does not accurately represent existing conditions.

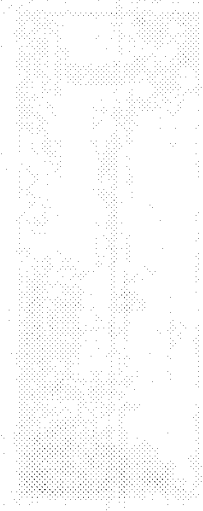
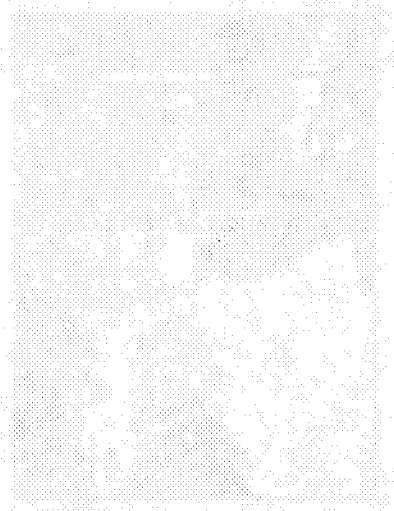
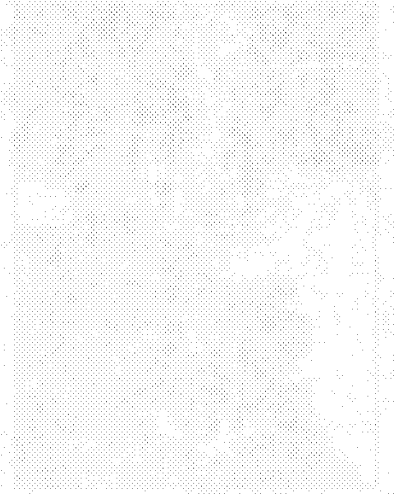
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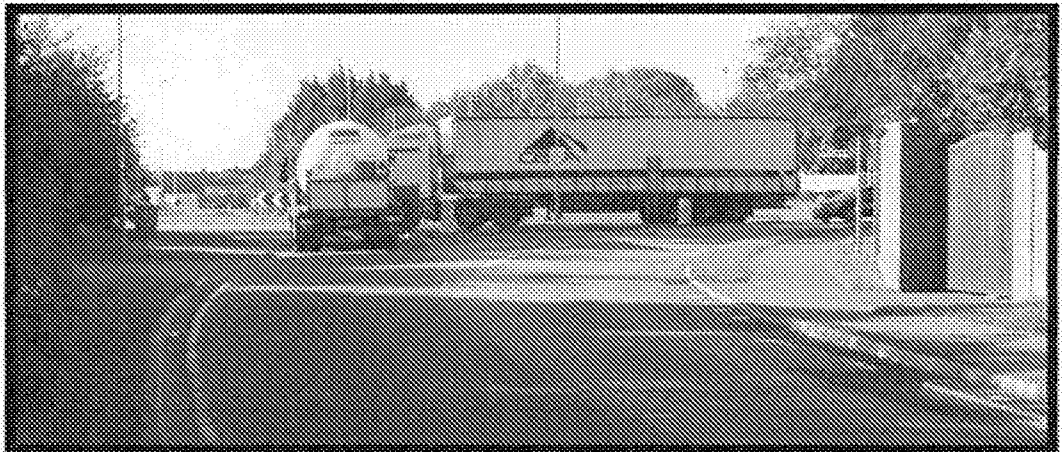
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Queue Looking West From A259/Roundstone Lane Junction
Frustration leads to overtaking on the hatching

- 6.11 Based on observations, the queue across the entry actually helps those entering on the northern arm but only when considerate motorists (west – east) leave a gap. At other times, when the west – east flow is unbroken it is very difficult for the northern entry traffic to find a suitable gap.
- 6.12 The northern entry is restricted and does not function well as a two lane entry as it is narrow. When even a small queue forms, drivers wanting to turn left towards the A280 block the movement to go straight ahead and right.



A259/Roundstone Lane Junction - Northern Entry
Narrow entry

- 6.13 The Water Lane traffic calming can have a detrimental effect on the A280/Water Lane right turn capacity. Motorists have been observed to go beyond the right turn in order to do a “U-turn” on the A280 and then left into Water Lane – queuing again as they turn left.

- 6.14 In general, the junction assessments do not fit well with the observed peak hour conditions and this should be looked at in detail by the Highway Authority as a lack of problems is a key assumption in the TA report.
- 6.15 We also recommend that thought be given as to how either through traffic can be encouraged or forced to use the bypass route or how predicted traffic from any further development can be discouraged from using the A280/Water Lane junction other than via the bypass. We believe that the answer is not just the use of vertical traffic calming and/or block paving.

7.0 MITIGATION OF DIRECTLY ATTRIBUTABLE TRANSPORT IMPACT & TRAVEL PLANNING

- 7.1 CEP TA report paragraph 9.2.1 states that no physical improvements to remote highway junctions or links are necessary. We do not agree. The TA states that all the A259 bound development traffic will travel via the northern entry to the A259/Roundstone Lane roundabout. Given our comments and examples about the operation of the A259 roundabouts in peak conditions, an improvement to the northern entry alone may bring improvements to those wishing to turn right towards the west – even in A259 eastbound queuing conditions. A simple reminder to motorists to keep the entry clear would also assist.
- 7.2 The offer of a contribution to the village scheme should be welcomed but only if all other aspects of the development are acceptable to the local authorities and impacts mitigated.

Travel Planning

- 7.3 What is a travel plan? A travel plan is a long term management strategy for an occupier or site that seeks to deliver sustainable transport objectives through positive action and is set out in a document that is regularly reviewed.
- 7.4 The interim travel plan suggests a £150 voucher for the first purchaser of the unit to exchange for one of four suggested measures. These are a season ticket, new cycle or equipment, 5-19 card and cycle training.
- 7.5 We have researched typical bus travel costs in the area and, as an example, the Worthing Megarider (which unfortunately only covers from Worthing to Langbury Lane – but presumably can be extended under travel planning) is available on-line for £502 for 52 weeks. The South Megarider Gold ticket covering a wider area is available on-line for £815 for 52 weeks. This leads to the conclusion that the purchase of a bus season ticket via the Travel Plan voucher is unlikely.
- 7.6 Bearing in mind these travel price examples, the HA should give careful consideration as to whether or not the Travel Plan proposals would adequately mitigate against impact or encourage and promote uses other than the private motor vehicle.

8.0 CONCLUSIONS

- 8.1 This Technical Note has been prepared in a non-technical format wherever possible to assist Save Angmering Village (SAV) in considering the appropriateness and suitability of the highway aspects of a local development proposal. The proposal is with Arun District Council as application number A/82/12.
- 8.2 We have attended two meetings with SAV representatives and explained general considerations and some of the more technical terms. We have also undertaken or supervised check surveys in order to be able to check assumptions and the finer detail of the CEP Transport Assessment (TA) report of July 2012.
- 8.3 The purpose of this technical note is to undertake a preliminary assessment of the information available to us, in early September, via the Arun web site. The nature of a TA means that some comments may seem repetitive. This can not always be avoided due to interlinked matters. We will make our summing up as brief as possible.
- 8.4 The site is described in the TA as 6.8ha and agricultural fields. We agree that there are no traffic credits appropriate for the site and assume that there should be a planning policy based refusal as the proposed development is outside the settlement area.
- 8.5 We understand from policy that WSCC and Arun are committed to looking at opportunities (through new development) to improve access along the A259 including improvements that will achieve better bus journey times. Clearly, this is intended to address congestion and delay along, on to and from the A259. Additional residential development on green field sites and other existing low generation sites can only exacerbate the local highway conditions if steps are not taken to plan ahead.
- 8.6 We have assessed the observations, assumptions and modelling in the TA report. If this aspect of modelling is not robust then predictions are open to question. We have concentrated our observations on the A280/Water Lane, A259/Station Road and A280/A259 junctions and links. Some assessment of village conditions has been undertaken but only in sufficient detail to gain a view of typical operation.
- 8.7 It is clear that the modelling and existing conditions (queues and operation) at the A259 do not match. Further details in relation to this should be required before a decision is taken by the Highway Authority (HA). Police consultation appears to be limited to Crime Prevention. Whilst this is an important aspect of any development, the views of the Police Traffic Management Unit would be useful.
- 8.8 It is less clear at the A280/Water Lane junction but predicted flows here for the 150 unit development are low. Observed manoeuvres, including "U-turns" at the A280/Water Lane give cause for significant concern and the nearby calming appears to have an impact at very busy peak times.

- 8.9 The TA predicts that all the A259 bound proposed development traffic is likely to access via the A259/Roundstone Lane roundabout. This is a reasonable assumption. However, bearing in mind our concerns about the model, we have significant concerns about the operation of that roundabout, as described, and the predictions after the proposed increase in traffic as a result of the proposed development. These matters have not been fully addressed in the TA. It would be reasonable to expect the Highway Authority to consider these matters in detail and look for mitigation of the impact of the development.
- 8.10 We have observed the existing traffic calming, particularly in Roundstone Lane. Our view is that the village vertical calming it is not as effective as intended and does not limit speeds below 30mph. The Road Safety Auditor raises concerns and appears to concur with our view in relation to Roundstone Lane. We have concerns that the proposed feature at the proposed junction may not be effective. Calming in the rest of the village needs careful consideration and we believe that the answer is not just the use of more vertical traffic calming and/or block paving.
- 8.11 We have compared the report TRICS and census data with information gathered locally and conclude that the TRICS data is not robust for the area. The census data is a better match for our check surveys.
- 8.12 The interim Travel Plan proposes measures that do not appear robust enough to encourage and promote a shift from the private motor car mode at this location. In particular, the voucher scheme promoted does not appear significant enough in the face of the actual cost of bus season tickets. We feel more could be done to encourage walking or cycling as an alternative mode.
- 8.13 We have asked questions in relation to matters such as the provision of shelters and the re-routing of the Roundstone Lane bus service in order to promote and encourage bus service use. It can not simply be assumed that prospective residents will use the services even with a voucher. The HA should give careful consideration as to whether or not the Travel Plan proposals, as outlined, would adequately mitigate against the impact of the proposed development.
- 8.14 The TA outlines the main employment areas but in the absence of further detail it must be assumed that those trips are likely to be made by private motor car.
- 8.15 We have concerns over the access and circulation for larger vehicles, particularly the refuse freighter. We have checked the size and type of vehicle used in this area and it is larger than that used for the tracking. We have noted from the tracking supplied that the vehicle over-runs the footways and service margins in some cases leading to road safety concerns. We recommend that the tracking is revised along with any layout changes necessary. In some cases, it appears that even one vehicle parked on-street (possibly a visitor) may block the effective use by the refuse freighter.

- 8.16 The offer of a contribution to the village scheme should be welcomed but only if all other aspects of the development are acceptable to the local authorities and impacts mitigated.
- 8.17 It will be obvious that we have only touched on the main areas for consideration rather than the detail that will be checked by the various departments in the Planning and Highway Authorities. We have outlined matters for further consideration, some of which have significant implications. On the basis of the matters considered in this technical note, it is clear that the Highway Authority can not recommend to the Planning Authority that the proposed development is given consent as it stands.



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ARUN DISTRICT COUNCIL TECHNICAL SUPPORT
25 SEP 2012
ACTION... (G/S)

RESIDENTIAL DEVELOPMENT COMPRISING 150 NO. DWELLINGS INCLUDING 30% AFFORDABLE WITH ACCESS, LANDSCAPING, OPEN SPACE AND ASSOCIATED WORKS

LAND EAST OF ROUNDSTONE LANE, ANGMERING



A PLANNING APPRAISAL

Planning Authority Reference: A/82/12

1.0 Introduction

- 1.1 An application for full permission has been submitted to Arun District Council (ADC) by Barratt David Wilson (Southampton) Limited, for residential development comprising 150 no. dwellings including 30% affordable with access, landscaping, open space & associated works (this application is a Departure from the Development Plan).
- 1.2 Rodway Planning Consultancy been engaged to assess this planning application: reference number A/82/12; on behalf of Save Angmering Village (SAV).

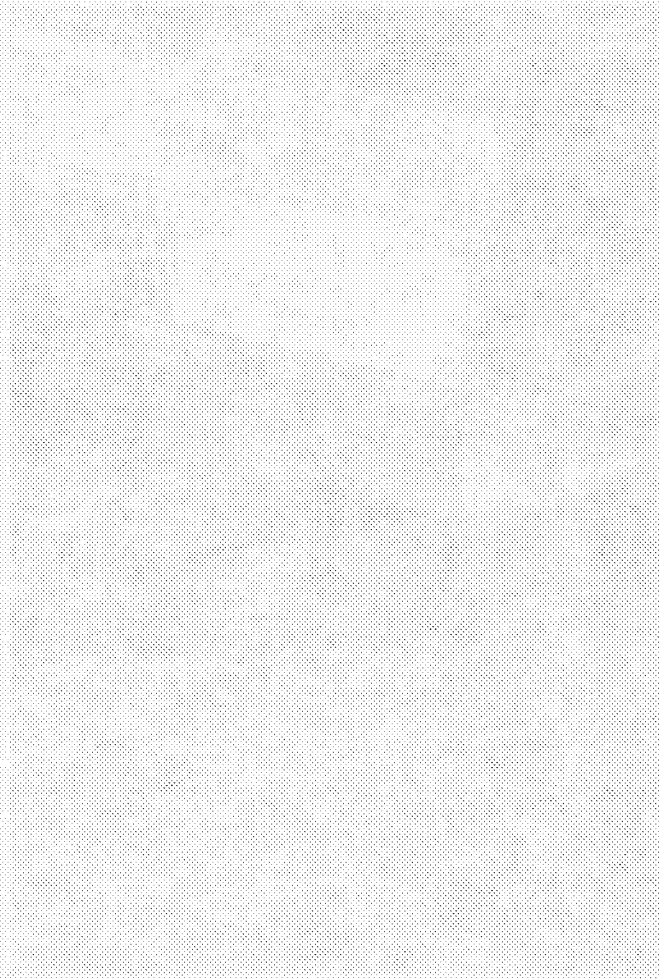


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realisation of space - making of place

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- 1.3 SAV was formed to ensure that **ANY** new housing proposed for Angmering has been demonstrated to be appropriate, sustainable and meets local needs. SAV represents over one-third of the residents of Angmering, who in April 2012 voted "no" to "new large-scale housing developments in Angmering" such as the one proposed under application A/82/12.
- 1.4 The main points addressed within this document are as follows:
- Government and Local planning policies and guidance, and the emergence of the Local Development Framework;
 - 5 year housing land supply;
 - Landscape implications;
 - Design and scale of development;
 - Layout;
 - Density;
 - Ecology and trees;
 - Infrastructure (including medical and educational services); and,
 - Flooding and Sewerage issues.
- 1.5 We have taken account of the documents and evidence submitted in support of the planning application; particularly the Design and Access Statement, and the Planning Statement submitted on behalf of the applicants by Luken Beck/Henry Adams. Documents referenced in our assessment of this application, include:
- The National Planning Policy Framework (NPPF)
 - The South East Plan (SEP)
 - The Arun District Local Plan (ADLP)
 - The emerging Local Plan
 - Arun's Strategic Housing Land Availability Assessment (SHLAA) 2012
 - Arun's Housing Land Supply Assessment
- 1.6 A separate report regarding Transport, Access and Parking has been prepared by David Bell of LGPS Resources (transport consultants) on behalf of SAV.
- 1.7 In regard to an appeal in Woodgate in the Parish of Aldingbourne (ADC ref: AL/69/11/), the Inspector considered **Policy GEN2** and **GEN3** to be 'out of date'.
- 1.8 In 2007 the Secretary of State granted consent for a number of ADLP policies to be saved, including **Policies GEN2, GEN3 and GEN7**, amongst others. It is understood that these saved ADLP policies will remain in place until such time as they are replaced by new policies in an adopted development plan document, or, are no longer compliant with national and regional planning policy.
- 1.9 It is therefore our view that full weight can be given to these saved policies of the 2003 ADLP (Para. 215 of the NPPF refers). This view is endorsed by the fact that





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Barratt David Wilson (Southampton) Limited make reference to various policies in both the 2003 ADLP and the emerging Local Plan in support of their application.

- 1.10 We have not recited matters of fact such as the site and surroundings which are adequately reported in these documents. However, relevant site features are referred to, as appropriate, to support the assessment.
- 1.11 Since the application is for full permission it is appropriate to consider: - (1) the principle of allowing residential development on the site and (2) whether the proposal constitutes an acceptable form of development.

2.0 Summary of Findings

The Site

- 2.1 The site which is the subject of application A/82/12, relates **ONLY** to the Greenfield section of a parcel of land (Site 80) that was identified by the "call for sites" exercise undertaken by Arun District Council (ADC), and documented in the (2012) SHLAA.
- 2.2 The site *"is slightly elevated above Roundstone Lane and the A280"*, and is comprised of Grade 1 agricultural Land as confirmed by the *"Green Infrastructure Study - Fig 3.7 Productive Green Environments"*, provided by Arun District Council in support of the ELP. It is also part of the landscape character that is visible on the approaches into, and also from the South Downs National Park.
- 2.3 This site is not allocated for residential development in the Development Plan, and is located outside of the built-up area boundary as defined by both the 2003 and emerging Local Plans. As such it is designated as Countryside.
- 2.4 It is suggested in ACD's "Landscape and Visual Impact Assessment", that landscaping to the sites boundaries will mitigate against any issues of landscape sensitivity, but also acknowledges that this screening could take 15 years to mature, and even then, a level of visual harm would remain.
- 2.5 The site is of archaeological interest and is in close proximity to a series of multi-period sites, including the historic settlement of Angmering, the Post Medieval 'Ecclesden Manor' and 'Pound House'. Numerous sites have already been identified within the immediate vicinity of the site along the Angmering by-pass and to the west of Roundstone Lane. As such there is the potential for archaeological remains from the Neolithic through the Bronze Age to the Post Medieval period.





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2.6 The key findings of this assessment can be summarised as follows:-

- a. **Housing Need:** The District's housing policy is currently under review by way of the emerging Local Plan, with further consultation now underway. It is clear that ADC has resolved upon a reduced housing target of 400dpa, once the South East Plan (SEP) is revoked, with Angmering allocated just 100 dwellings over the plan period.
- b. **Principle of Development:** The Council's 2012 SHLAA indicates that this site *could* be suitable for future development, but only as part of a larger, comprehensive land assembly, including adjacent land. It also acknowledges a range of potential issues, not least impact on the Conservation Area, Listed Buildings, the South Downs National Park landscape, and ground water flood risk.
- c. The site is considered by the 2012 SHLAA against others in Angmering, and it is clear that this site (reference no.80); together with site no. 48; although considered as being "in a location that developers find attractive" are the least favourable options for development within or outside the Angmering village settlement boundary.
- d. Given that once the SEP is revoked under the provisions of the Localism Act, Angmering will only have to provide 100 dwellings within the forthcoming Plan period (Option 1, as referred to above), it is clear that other, more preferred sites are more than capable of meeting this requirement, for example, a piece of land south of Bramley Green / north of Mayflower Way, a brownfield site which lies within the built-up area boundary (This is discussed in more detail under para 4.8 below).
- e. The Council has confirmed in its 'Housing Land Supply Assessment' that it is currently able to demonstrate a five year housing supply of land for the five year period ended 31st March 2017 in excess of the calculated housing requirement for the Arun district and after including an allowance to account for a shortfall in housing delivery to date and an additional buffer of 5%.
- f. The development does not satisfy the important criteria contained within the ADLP Policy GEN7 since the development does not have a form and character which respects the locality.
- g. The development would be 'top heavy', supplying a large percentage of large 4- and 5-bed units, in an area with an identified requirement for a range of dwellings to include a larger proportion of 1 and 2 bed units to meet local need.





DIAMOND J. YARDON PRESIDENT



Professional Engineers and Surveyors
are authorized to practice in all states.



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- h. The development conflicts with the requirements of ADLP Policies GEN7, GEN20 and GEN27, which require developments to provide high quality landscaping, open space and to take full account of the landscape characteristics of the locality.
 - i. **Heritage Statement:** No Heritage Statement has been included within the application.
 - j. **Archaeological Interest:** The potential for the discovery of Prehistoric evidence and archaeological deposits dating to the Roman period is assessed as both being high and of regional significance. It is our view that the site should be sampled by field investigation before the determination of the application.
 - k. **Flooding:** Based on the information submitted, there is considerable concern that the analysis period over which evidence was collected to assess the potential of groundwater flooding is unsound (see paragraph 5.33 below). It is considered that building on this groundwater emergence site has the potential to exacerbate existing drainage and flooding issues locally, and as such the proposal would fail to comply with Policy GEN9 of the ADLP.
 - l. **Sewerage:** In the light of existing sewerage issues in Angmering, the application has failed to demonstrate that there is any prospect of an acceptable foul sewage proposal that will not result in additional adverse impacts on capacity. The proposals are contrary to Policy GEN9 of the ADLP, Policy NRM2 of the SEP and PPS23 and PPS25.
 - m. **Quality of Supporting Documentation:** Careful examination reveals that site references and evidence provided in many of the supporting documents submitted with the planning application are in part out of date. Many were created months prior to the application being submitted – some as early as January 2011. As a result they contain maps and evidence, which are in places inaccurate and also make reference to a larger site area that is not relevant to this application.
- 2.7 The Council's Option for Growth document (2009) concluded that Angmering is not an area of high housing need and currently provides limited accessibility to employment opportunities. Public transport is also generally poor, and some of the area has issues of landscape sensitivity.
- 2.8 On behalf of SAV, based on the findings in this document, we therefore write to formally **OBJECT** to this application, on the basis that we consider there to be a significant number of material planning objections to this scheme.





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3.0 The Development Plan

3.1 The Application has been assessed against the key principles and requirements set out in the following Government guidelines and Local Policies:

3.2 The National Planning Policy Framework (NPPF)

The NPPF at paragraphs 7 and 14 set out a presumption in favour of high quality, sustainable development, with accessible local services. This is in support of approving, without delay, any proposal that accords with the development plan. Alternatively, where the development plan is out-of-date, development should be approved unless its benefits would be significantly and demonstrably outweighed by adverse impacts when assessed against the Framework as a whole.

Amenity: NPPF paragraph 17 includes the core principles, on one hand, to make every effort proactively to drive sustainable economic development and, on the other, to seek a good standard of amenity for existing occupiers of land and buildings, and to take account of the different roles and character of different areas, recognising the intrinsic character and beauty of the countryside.

Transport: NPPF paragraphs 29 to 41 set out national policy for sustainable transport. This includes ensuring that development is located where the need to travel is minimised and the use of sustainable transport modes can be maximised (para 34), and high quality public transport is available and safe access is provided with priority to pedestrian and cycle movements (para 35). For larger scale development, a mix of uses is favoured to include employment on site and community facilities within walking distance of most properties (para 38). Development should only be prevented on transport grounds where adverse impacts are severe (para 32).

Land Supply: With respect to housing, NPPF paragraph 47 provides for local planning authorities to use their evidence base to assess objectively the housing requirement to be met in their local plans. A five-year supply of deliverable sites should be identified, with an additional buffer of 5%. Where there has been a persistent record of under delivery a 20% buffer is required to provide a realistic prospect of achieving planned housing supply. Paragraph 48 allows the five-year supply to include windfall sites where there is compelling evidence that this is a reliable source. Paragraph 49 states, with reference to the presumption in favour of sustainable development, that local housing supply policies should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable sites.

Local Policies: NPPF paragraph 214, for the time being, gives full weight to local policies adopted since 2004 even where there is limited conflict with the Framework, whilst paragraph 215 states that due weight may be given to relevant





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local policies adopted before 2004, according to their degree of consistency with the Framework.

The NPPF reiterates, in paragraphs 11-13, the legal requirement that planning decisions must be taken in accordance with the Development Plan unless material considerations, including the Framework itself, indicate otherwise.

The Development Plan for Arun District currently encompasses the South East Plan (SEP), as the Regional Spatial Strategy (which is intended in due course to be revoked under the Localism Act), and Arun District Local Plan (ADLP) - the plan period for which expired in April 2011. However, it is acknowledged that for the time being, the statutory development plan provisions of most relevance to this appeal are contained in SEP Policies CC6, H1, H2, SCT1 and SCT5 and in ADLP Saved Policies GEN2, GEN3, GEN5, GEN7 and GEN32.

3.3 The South East Plan (SEP)

The SEP Policies together set out a vision to promote high quality development in support of sustainable economic growth and regeneration of the Sussex Coast. Policy CC6 on sustainable communities requires development to respect the character and distinctiveness of settlements and landscapes and to create a high quality built environment, including with respect to accessibility.

On housing, the SEP provides for the managed delivery of 11,300 new dwellings in Arun District between 2006 and 2026, at an average rate of 565 dwellings per annum (dpa). Policy H2 includes the provision that account should be taken of any backlog of unmet housing needs within the first 10 years of the Plan.

3.4 The Arun District Local Plan (ADLP)

The ADLP was statutorily adopted in 2003, and its policies were saved for a period up to April 2011 while the District worked on its Local Development Framework (LDF) in accordance with revised Development Plan procedures. Pending its replacement by all the components of the LDF it is considered that the policies within the Local Plan are still material planning considerations provided they are not undermined by more recent Central Government Advice such as National Planning Policy Framework (NPPF), and by key documents in the emerging LDF process.

The NPPF states that Local Plans that were adopted prior to 2004 should be afforded more limited weight. However the current ADLP was adopted in 2003, the policies were then saved by the Secretary of State's direction in September 2007.

At that time, the Secretary of State assessed whether the saved policies should be extended, based upon the criteria set out in the former PPS12. The Secretary of State granted consent for a number of ADLP policies to be saved, including Policies GEN2, GEN3 and GEN7, amongst others. It is understood that these saved ADLP





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policies will remain in place until such time as they are replaced by new policies in an adopted Development Plan document or are no longer compliant with national and regional planning policy.

Our assessment of the relevant saved policies are that they remain wholly compliant with the guidance and intentions of the SEP and the new NPPF, and therefore they should be afforded **full weight**. This issue is discussed in more detail under para. 3.6 below.

Within Arun District, ADLP Policy GEN2 defines built-up area boundaries outside which Policy GEN3 resists development, in order to protect the countryside for its own sake. Policy GEN7 seeks high quality design that responds to site characteristics and allows for safe movement of vehicles, giving priority to pedestrians. Policy GEN32 aims to avoid significant noise pollution arising from new development.

For housing, ADLP Policy GEN5 sets a District target of 8,700 new dwellings between 1996 and 2011, a figure that was based on gross totals before losses in the former West Sussex County Structure Plan.

3.5 Emerging Local Policy

The emerging spatial vision for Arun District follows a long-established approach to focus growth mainly on the larger settlements. As part of the plan preparation, ADC has carried out extensive community consultation in order to determine what is appropriate for the District in terms of housing growth:

1. Issues and Options (2005) – Established the direction of travel for the vision and objectives of the emerging Local Plan;
2. Options for Growth (2009) – Took the visions and objectives further and consulted on 3 options; and,
3. Housing & Employment Growth (2010-11).

In June 2011, following the analysis of the consultation responses, ADC indicated a preferred target of 400 units per annum for the District, for the period 2011-2028, should the SEP be revoked. This target provided the basis for the development of the Council's policy approach, alongside the 565 unit per annum target dictated by the SEP.

The emerging Local Plan therefore specifies two target figures for the future housing growth in the District: (i) based on previous consultation on housing numbers (Option 1 – 400 dwellings per annum); and, (ii) based on the requirements of the SEP (Option 2 – 565 dwellings per annum).

Within the emerging Local Plan is proposed **Policy SP8**, entitled 'Strategic Housing, Parish and Town Council Allocations', which states:





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"strategic housing shall be accommodated as follows;

- (i) through sustainable urban extensions adjoining Littlehampton and Bognor Regis from existing planning consents;*
- (ii) in the Barnham / Eastergate / Westergate area and*
- (iii) Angmering"*

With specific regard to the village of Angmering, the consultation version of the emerging ADLP Policy SP8 states:

"The broad location for development has been identified on the Key Diagram. The council requires well designed developments. The following specifics must be addressed as part of any planning application:

- Provision of approximately 490 new homes;*
- Road improvements to the A259;*
- Designed to take account of the sensitive nature of listed buildings and the Conservation Area;*
- Provide open space and areas for recreation in accordance with the open space, sports and recreation policies set out in this Plan;*
- Provide for a buffer strip along the eastern and northern boundaries to suitably screen this area when viewed from the South Downs National Park; and,*
- Resolve primary and secondary school place requirements and provision.*

In the above cases, developments shall also be consistent with all other Local Plan policies."

The above wording specifies 490 new homes, which would be required under Option 2 (SEP remaining in place). However, also supporting this policy is Table 13.2, which outlines that under Option 1, 100 units could be delivered in Angmering over the plan period. The Policy states that sites for these new homes will be determined by Parish and Town Councils.

In summary, it is clear that the District's housing policy is currently under review by way of the emerging Local Plan, with further consultation now underway. But it is also clear that ADC has resolved upon a reduced housing target of 400dpa, once the SEP is revoked, with Angmering allocated just 100 dwellings over the plan period (Option 1 applies).

3.6 Relative Weight of National and Local Policy

The SEP, which was adopted after 2004, falls to be considered with reference to Framework paragraph 214. There is little dispute that the relevant SEP Policies are essentially consistent with the NPPF and, to that extent, carry their full statutory weight in relation to this case. At the same time, their provisions are of a general nature.





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The ADLP, adopted before 2004, falls to be considered with reference to Framework paragraph 215. Policies GEN7 on design and GEN32 on noise are essentially consistent with the Framework and continue to carry full weight.

However, a recent Planning Inspector when considering an appeal in Woodgate in the Parish of Aldingbourne to the west (ADC ref: AL/69/11/) was of the opinion that the requirement of Policy GEN3 to protect the countryside for its own sake, whilst *"reflecting former national advice, has given way to the provision in Framework paragraph 17 simply to recognise its intrinsic character and beauty. As a result, with respect to Policy GEN3 the Framework is properly regarded as attracting greater weight."*

This is an important point. Essentially this means that the designated built-up area boundaries of Policy GEN2 which were adopted to accommodate development needs within settlements which were in 2003 regarded as sustainable. The Planning Inspector went on to comment that *"even then, the housing target of Policy GEN5 was explained in terms that envisaged the need for pro-active steps, including possible early policy review, in the event that housing did not come forward at the required rate... It is undisputed that housing land has not come forward at the required rate of either the ADLP or the subsequent SEP. ADC expressly accepts that the time expired built-up boundaries of the adopted ADLP now have significantly reduced weight and do not relate to housing beyond 2011. As a result, housing sites will be required outside the currently defined built-up boundaries. To that extent, the local housing policies are to be regarded as out of date in any event and this is a material consideration in the appeal. However, it remains to consider the effects of the appeal development on individual merit."*

Although the views of the Inspector are noted, this seems a slightly heavy handed approach to suggest that effectively the built-up area boundaries and in particular Policy GEN2 of the ADLP carries no weight due to being out of date. Policies within the ADLP were reassessed and 'saved' in 2007, and therefore it is our view that full weight can be given to these saved policies of the ADLP (para. 215 of the NPPF refers).

In addition, it should be noted that the built-up area boundary for Angmering as currently adopted under the 2003 ADLP, and that proposed under the emerging Plan, remains largely unaltered. The site proposed for development under A/82/12 is clearly outside of the built-up area boundary under both current and emerging Plans, and as such it is currently countryside, and the intention is for this designation to remain under the forthcoming ADLP. The plan below confirms this:





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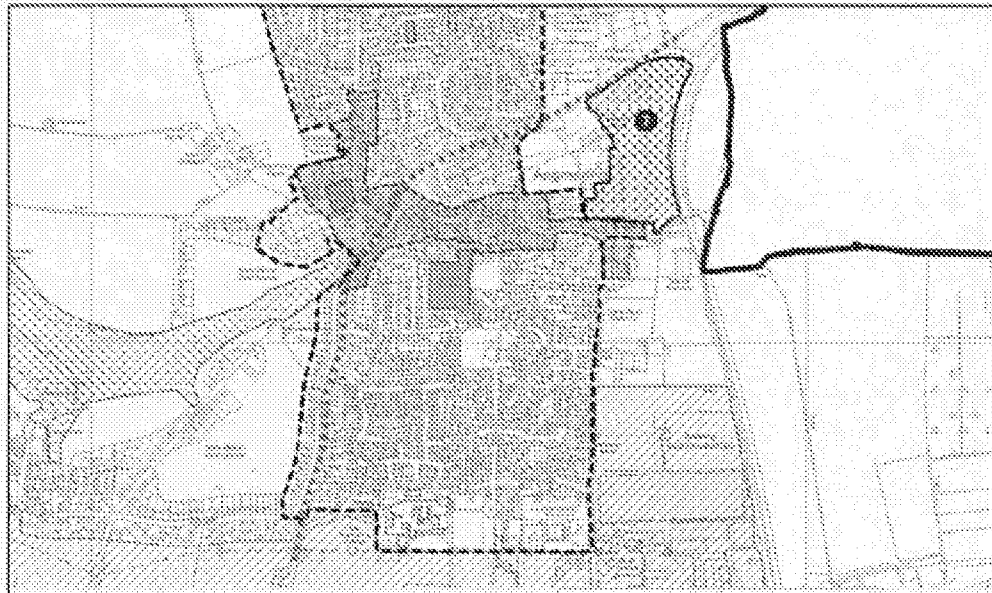


Fig. 1 Emerging ADLP Proposals Map 4: Littlehampton and Surrounding Area

We feel strongly that saved Policies GEN2 and GEN3 continue to apply, as they are generally consistent with the various policies and guidance contained within the NPPF, as these Policies seek to strictly control development in rural areas outside of the defined built-up areas within the District.

We also believe that our position is further strengthened by the fact that Barratt David Wilson (Southampton) Limited, make reference to policies in both the 2003 ADLP and emerging Local Plan in support of their application.

- 3.7 At this point, it should be noted that this is an objective consideration of the information provided within the submitted planning application, which takes into account information provided by SAV and Arun District Council. Our viewpoint is based on planning law and guidance, and is provided to assist SAV in formulating their response to the current planning application submitted by Barratt David Wilson (Southampton) Limited.

4.0 The Principle of Development

The proposals are in direct conflict with existing saved planning policies:

- 4.1 The site is located outside any built up area as designated within the current Local Plan. The land is Grade 1 agricultural land which is used primarily for





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grazing/agricultural purposes. Hence this is a "Greenfield" site within a rural area, where there is a presumption against development.

The Strategic Housing Land Availability Assessment (SHLAA)

- 4.2 In May 2012, the District Council published an update to the 2009 SHLAA. The SHLAA provides an informed estimate of land availability for housing at a given point in time, to inform plan-making and to ensure that Arun District Council maintain a five-year supply of housing land.
- 4.3 All sites previously assessed in the 2009 SHLAA were reviewed, together with existing planning permissions at the new base date of 1st April 2011 and planning permissions granted subsequently until the end of December 2011. No new "call for sites" exercise was undertaken.
- 4.4 In respect of the village of Angmering, the key findings of the 2012 SHLAA update can be summarised as follows:-
- a. There are no major designations which provide a clear cut constraint to development around the settlement of Angmering, although the boundary of the South Downs National Park extends close to the north eastern part of the settlement;
 - b. In broad terms, sites to the east and south of Angmering are closer to a broad range of facilities and services than sites to the north;
 - c. Land on the north eastern side of Angmering has potential for development provided that it is confined to western parts which are relatively contained in character and already developed for agricultural buildings and small storage yards;
 - d. The Council's Option for Growth document (2009) concluded that Angmering is not an area of high housing need and currently provides limited accessibility to employment opportunities. Public transport is also generally poor, and some of the area has issues of landscape sensitivity. However, subject to further detailed assessment, it was considered that this area may offer some potential for strategic development; and,
 - e. The SHLAA concludes in respect of Angmering village that sites numbered 48, 80, 82 and 109 outside settlement boundaries **may** provide future potential subject to availability and further consideration through the plan making process. Sites 48, 80 and 82 were within the Council's proposed area of search in this location in the Options for Growth consultation, together with sites A1, 96 and 148 which were rejected in this SHLAA update.





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- 4.5 The current planning application to which this appraisal refers, relates to land that falls within that referenced as site no. 80 in the SHLAA update. A site plan is shown below at Fig 2. It must however be noted that only the Greenfield element (6.83 hectares) of Site 80 is in the scope of this planning application.
- 4.6 The SHLAA Update describes the entire 10.52 hectare site as follows:
- a. This is a flat site containing 2 properties (residential), a nursery, fields and a footpath to the east. The site is on the edge of the built up area. Access is off Roundstone Lane. The site area is 10.52 hectares;
 - b. The site is located outside of the settlement boundary within countryside where development for housing is not generally permitted except in particular circumstances and for specific uses. (Policy GEN3);
 - c. The site is adjacent to Listed Buildings - Pound Place, Spotted Cow (to north);
 - d. The site is adjacent to the Angmering Conservation Area;
 - e. The site is located with a groundwater emergence zone and there is potential for groundwater flood risk;
 - f. In a previous Landscape Study conducted in 2006, this area was judged as having a 'Low/ Medium' Landscape Capacity for development. This was based on an assessment of the areas Landscape Value and Landscape Sensitivity;
 - g. In terms of site suitability, the document states: *"Outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, the site could be considered as part of a comprehensive development including adjacent land. If planned comprehensively this could contribute to the creation of a sustainable, mixed community."* It determines that the site could accommodate 290 houses within the period 2018-2022, but this is depending on the Council's eventual distribution of development strategy.





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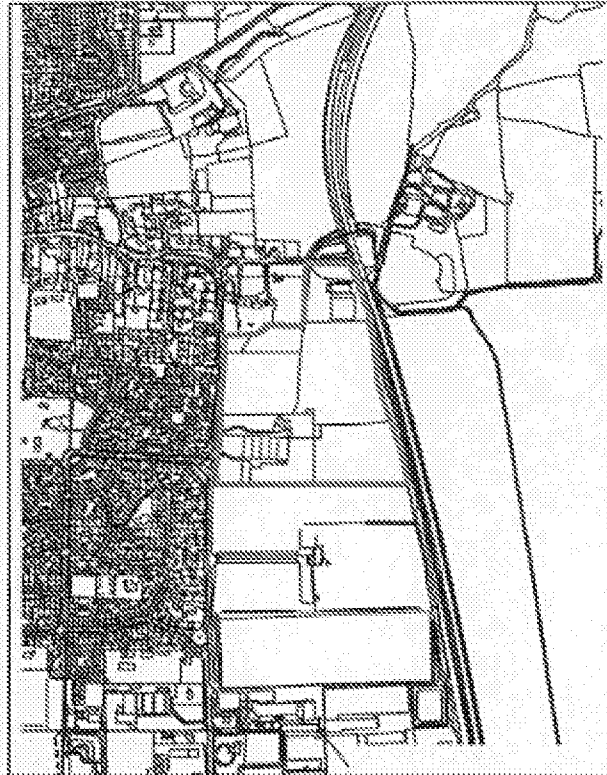


Fig 2. Location Plan detailing Site no.80, as considered under the SHLAA Update.

- 4.7 To conclude on issues of principle, the SHLAA indicates that this site could be suitable for future development, but **only** as part of a larger, comprehensive land assembly, including adjacent land. In isolation the sustainability of this proposed development is therefore questionable. In saying this, the SHLAA also acknowledges that there is a vast range of potential issues, not least impact on the Conservation Area, Listed Buildings, the South Downs National Park landscape, and ground water flood risk. The site is considered against others in Angmering, and it is clear from the SHLAA update that this site (together with site no. 48) are the least favourable options for development within or outside the village.
- 4.8 The most favourable site that is considered under the SHLAA is site ref: 101 (Land south of Bramley Green/north of Mayflower Way). This site lies within the built-up area boundary, and has a suggested yield of 100 dwellings. If this site does not come forward, then sites 109 (175 units) and 82 (380 units) are considered most preferred by the SHLAA.
- 4.9 Given that once the SEP is revoked under the provisions of the Localism Act, Angmering will only have to provide 100 dwellings within the forthcoming Plan





Содержание: 1. Введение. 2. Описание проекта. 3. Технические характеристики. 4. Заключение.

ВВЕДЕНИЕ

Настоящий документ является частью проекта и содержит описание технических характеристик и требований к проекту. Данный документ предназначен для использования в качестве справочного материала при выполнении работ по проекту.

ОПИСАНИЕ ПРОЕКТА

Проект представляет собой комплекс работ, направленных на реализацию поставленных задач. Проект осуществляется в соответствии с требованиями, изложенными в техническом задании.



ОБЩАЯ СХЕМА





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period (Option 1, as referred to above), it is clear that other, more preferred sites (including Brownfield sites) are more than capable of meeting this requirement.

5-year Housing Land Supply

- 4.10 Paragraph 49 of the NPPF states: *"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites."*
- 4.11 It is understood that in late 2011/early 2012, ADC were unable to demonstrate a 5 year housing land supply, as required under Para. 49 of the NPPF. However, following the approval of a number of large residential planning applications in early 2012 (for example, 173 dwellings at Burndell Road, Yapton [ref: Y/81/10]; 39 dwellings at Jenkins Yard, Ferring [FG/23/10]; and, 600 units at Courtwick Road, Littlehampton [ref: LU/355/10]), the Council is now in a position to clearly demonstrate a 5 year housing land supply.
- 4.12 Following the approval of these schemes, in May 2012, the Council published an update to its 5 year housing supply position, with a document entitled 'Housing Land Supply Assessment'. This confirms that as at 31st March 2012, the Council were able to demonstrate that there is a supply of land for the five year period ended 31st March 2017 in excess of the calculated housing requirement for the Arun district and after including an allowance to account for a shortfall in housing delivery to date and an additional buffer of 5%.
- 4.13 As such it is clear that as ADC is able to demonstrate a 5 year housing land supply, their housing supply policies can be considered up to date. The consequence of this is that development proposals for new housing are to be considered against the relevant Development Plan policies. In this instance, and as highlighted above, the relevant policy documents are the SEP and ADLP. These combine to confirm that the site is outside of the built-up area of Angmering, where there is a presumption against inappropriate development, which includes housing development, where there is not an identified and specific need.

Infrastructure

- 4.14 It is noted that the applicants are prepared to make financial contributions to the provision of infrastructure in accordance with the Council's guidance and policies. Further information needs to be provided by the applicant on whether this "financial contribution" will cover:
- improved access to local facilities, e.g. addressing existing road congestion;
 - provision of cycle routes and pavements;
 - public transport provision e.g. increasing the frequency of the hourly No .9 bus service (that only runs from 7am to 7pm with no service on Sundays or





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Bank Holidays) which runs down Roundstone Lane to local schools and to Angmering railway station;

- increased school provision;
- upgrading of existing sewers and drains; and,
- implementing flood prevention measures.

- 4.15 In addition, it is considered that the site is reasonably well located, in relation to existing community facilities in Angmering village centre. Amenities are said to be within a "short walk" of the site, although this is not defined in distance or time. It is also within easy access of other nearby towns, such as Littlehampton and Worthing, which both provide a higher level of service provision. As such, a range of public transport, employment and local services, such as education facilities, shops, employment opportunities, libraries and dentists are all reasonably nearby.
- 4.16 The site is over 1 mile away from Angmering railway station with an infrequent bus service. This will encourage a high dependence on the private car to access shops, and out-commuting to employment centres in nearby towns, leading to increased traffic congestion, air pollution and deterioration in the quality of life for existing residents.
- 4.17 There are concerns about the capacity of some services. For instance, although the village centre, schools etc are within walking distance of the site, there is currently no safe route to these facilities, with many of the narrow village lanes between the site and Arundel Road not having pavements. Accessibility to services by pedestrians may therefore be limited.
- 4.18 We believe that it is unlikely that there will be any reasonable take up of public transport as the only bus service adjacent to the site is the number 9 between Lancing & Littlehampton which runs hourly along Roundstone Lane, 6 days a week between the hours of 7am and 7pm, and Angmering station is also over a mile away.
- 4.19 In our view, the proposed development would also result in a significant increase in vehicle movements along Roundstone Lane (and queuing onto the A259), as well as along High Street, Weavers Hill, Water Lane and Downs Way, which are all used as "rat-runs" by out-commuters. These are narrow village roads in the Conservation Area with a single pavement or no pavements at all, where dwellings are sited directly onto the road and where on-street car parking takes place. The increase in vehicle movements from the proposed development would result in a significant increase in pollution, noise and disturbance thereby reducing the quality of life of the existing residents. The proposals are therefore contrary to **Policy GEN7 and GEN32** of the ADLP.
- 4.20 Before the Council considers this application, we believe that the applicant needs to provide more information based on their interpretation of a "short walk" if it is





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to be proven beyond reasonable doubt that the prospective new residents will not consider the distances as too far to walk, or public transport inadequate, and travel to local shops and services by car adding to the existing parking and road congestion problems. *Note: Please reference "Technical Note No.1" prepared for SAV by David Bell of LGPS Resources (transport consultants), which specifically addresses transport, access and parking.*

- 4.21 As it stands, in the absence of any clear proposals to mitigate against these matters, or provide new or improved infrastructure, in our view, the proposals do not represent a sustainable form of development where a presumption in favour would apply and the proposals are therefore contrary to **Policies CC6, SCT1 and SCT5** of the SEP and relevant parts of the NPPF.
- 4.22 **Schools:** Both Primary schools are located at the northern edge of the village, a mile or more from the site. They are already oversubscribed, with local children having to travel outside the village to school. The District Council is requested to investigate this matter in detail before assessing availability of education provision. It is a material consideration that ADC local plan policies, including those on the provision of infrastructure are still in force.
- 4.23 **Doctors' Surgery:** Angmering Medical Centre is unable to accommodate additional patients, with patients reporting that they can have to wait 2-3 weeks for an appointment. There is a requirement to confirm how the funding of additional medical resources would be met in the long term.
- 4.24 **Sewerage:** A further concern relates to foul water drainage. The existing infrastructure is struggling to cope with the additional housing that has been added to Angmering in recent times at Bramley Green. We are aware that sewerage infrastructure recently collapsed in The Dell as it was too narrow to cope with the additional strain of the Bramley Green sewage that links into it. The "Strategic Flood Risk Assessment - Arun District Council - Volume IV - Assessment of Sites of Search - February 2008", provides the following information on sewerage infrastructure in Angmering:
- *"North Angmering: Medium probability of flooding from sewers. Likely to be limited existing sewer infrastructure at the site although some recorded incidents of sewer flooding in the vicinity."*
 - *"South Angmering: Medium probability of flooding from sewers. Some recorded incidents in the site and vicinity"*
- 4.25 Our understanding is that the sewage from this site will flow north into High Street, but then flows back through the village centre, which is where there have already been sewage overflow problems as recent as the summer of 2011 which resulted in sewage flooding the land at the back of the Village Hall.





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- 4.26 It is clear that Angmering's infrastructure can only just cope with the recent housing development at Bramley Green, let alone a further 150 houses.
- 4.27 The application as it stands does not provide any evidence that the capacity of existing foul sewerage infrastructure has been considered. The applicants have failed to demonstrate that there is any prospect of an acceptable foul and surface sewage proposal that will not result in additional adverse impacts on capacity, increased flood risk to existing properties, pollution to water quality or that the risks of pollution and water quality could be safely managed. The proposals are contrary to **Policy GEN9** of the ADLP, **Policy NRM2** of the SEP and **PPS23** and **PPS25**.

5.0 Form of Development

- 5.1 The detailed form and layout of the proposal still has to satisfy established Local Plan policies which remain in force and Central Government Policy.

Open Space

- 5.2 The site layout includes 3.88 acres (1.57 hectares) area of allocated Public Open Space (POS) split between 3 small areas of designated POS and a further community garden. However these areas are generally peripheral and not well integrated to the main body of the proposed development. Therefore despite the applicant's intentions of linking the areas with permanent footpaths, there is concern that the POS's will not be integrated into the development and will be underused.
- 5.3 There is a further problem with the size of the POSs. The total site area is 6.83 hectares. It is acknowledged that permeable, non-landscaped areas of the site layout will comprise half of this (3.4 hectares). The remaining half will be split between private gardens, ancillary landscaped areas and the POSs referred to above. At 1.57 hectares, the POS provision accounts for just 23% of the total site area. This provision is fairly insignificant, especially when it is noted that this amount is divided over 4 separate areas; and given the concern over usability and integration, it is doubtful that the potential benefits of this space will be realised.
- 5.4 Additionally, whilst it is acknowledged that tree lined streets can be attractive; with no notable open, landscaped public space separating the buildings proposed, it is clear that the development would lack the soft, low density nature of the immediate surrounding area of Angmering village. The development would have a hard, suburban feel, and would therefore be detrimental to the existing character of the locality. This fact is exacerbated by the proportion of large, detached 'executive' style homes. If the scale of the development was reduced to include a higher proportion of smaller houses, then the spacious nature of the layout would





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be improved dramatically. This would also accord with local housing need for smaller, more affordable dwellings.

- 5.5 The District Council's Leisure department may be happy to accept payments to improve play facilities elsewhere within the immediate locality, but we are concerned that this would not be readily accessible to the residents of the proposed new development.
- 5.6 In summary, we strongly believe that the positioning of the POS is poorly related to the development as a whole, and further the extent of the space is insufficient to serve a development of this scale. Existing and future residents will have little benefit from the POS as proposed by this development, and as such the application falls foul of established local and national planning policies on estate layout and open space provision.

Scale, character and density

- 5.7 A detailed examination of the dwelling types and plot layout indicates that large parts of the development will be higher and bulkier than its surroundings. There is no compensating allowance of increased spacing between dwellings. The spacing between the larger dwellings is no different to that of the more modest development. This would further increase the perceived dominance of this proposed development when viewed from the wider countryside.
- 5.8 As highlighted above, there is very little open space within the internal layout of the development and this would give rise to a very cramped appearance that would feel oppressive for the occupants. This is exacerbated by a number of buildings with only very small gaps separating them from one another, and consequently appearing as an almost continuous form of development. This is particularly evident in the centre of the development layout that is proposed.
- 5.9 It is clearly evident that the spaciousness and open nature of the immediately surrounding properties – most notably directly to the north – is not reflected by the suggested layout of development.
- 5.10 The design of the majority of the dwelling types follows traditional forms used in the area, although the overall design philosophy has been watered-down in places. Many of the small units have a uniform appearance. Despite a mixture of external materials and finishes, the overall design is capable of improvement with a greater degree of diversity, which would also be a counter-weight to a relatively rigid proposed layout.
- 5.11 The development is at a fairly low density (approximately 21.8 dwellings per hectare), but this is still fairly high given the rural location of the site. However, we feel that this density calculation does not take into account the large scale of the majority of houses that are proposed. It should be noted that there are very few





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'small' dwellings, with almost 40% of the houses proposed being either 4- or 5-beds. The layout should be re-designed so as to reflect the character of adjoining roads by providing more space between dwellings where they front existing roads, and include a larger proportion of smaller dwellings elsewhere on the site.

- 5.12 In respect of local distinctiveness, an additional concern is raised regarding the intensity of the scheme compared to that of adjacent areas. The issues arising from the proximity of the Conservation Area are addressed below. However, in general terms, the degree of intervisibility between the application site and the nearest residential development is fairly high. The density proposed would be similar to more recent built development in the wider locality, however, given that this site is isolated and rural in nature and separated from the built-up area by Roundstone Lane, it is suggested that the density is excessive resulting in overdevelopment to the detriment of the wider, generally rural area. Although additional open space and landscaping would be provided, which would broadly accord with existing local distinctiveness, this is insufficient to mask the intensity of the development.
- 5.13 It is considered that the development does not satisfy the important criteria contained within the ADLP Policy GEN7 since the development does not have a form and character which respects the locality.

Housing mix

- 5.14 The application proposes only a very small proportion of small dwellings coming forward for sale on the open market. Only 25 (29%) of the dwellings can be classified as small (2 bed), with no 1-bed units whatsoever. Our feeling is that a greater proportion of these could be introduced at the exclusion of some of the larger dwellings without compromising the proposed scheme or its surroundings. Indeed, the above identified cramped appearance and lack of open space proposed by this development could be partly alleviated if buildings were reduced in their size. It is noted that the 4- and 5-bed units comprise almost 40% of the proposed dwelling types, which is extremely high for a development of this size, in an area with an identified requirement for a range of dwellings to meet local need for more 1 and 2-bed units.
- 5.15 The required affordable housing provision is fairly well mixed or 'pepper potted' within the layout of the development, so as to not provide an unbalanced layout where the affordable provision is concentrated within any one part of the development. This is supported by local and national planning policies.

Landscape and Visual Impact

- 5.16 The site description provided by the applicant is as follows: *"To the north of the site the southern edge of the South Downs National Park runs down to the north eastern corner of the site to the far side of the footbridge over the A280. To the*





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northwest properties within the Angmering Conservation Area are adjacent to the site although they seem to be fairly well screened by boundary vegetation. The northern boundary of the site is edged with mature vegetation and by a section of Angmering High Street. It has a Public House and village properties with the entrance to the Manor Nurseries Garden Centre and a car park area to the north of the road from which a footpath goes over a raised footbridge across the A280 to the other side of the road. To the east of the site is a footpath which runs alongside the well vegetated site boundary, known as Cow Lane beyond which is the A280, a major trunk route. To the west of the site is a recently developed residential area. The proposed development would be clearly visible to those properties lying on the edge of the development. To the south of the site is Worthing Rugby Club ground and extensive green housing which is part of the Haskins Garden Centre".

- 5.17 In August 2006, Arun District Council published 'Arun Landscape Study: Landscape and Visual Amenity Aspects of Development Choice in Arun District'. The report was prepared by respect landscape consultants, Hackinson Duckett Associates. In respect of Angmering, which falls within an area defined as Zone 4, the Study indicates that there are urban influences on the landscape between Angmering and neighbouring settlements, but the narrow belts of agricultural land do provide clear separation between the settlements, and as such are important.
- 5.18 On behalf of the applicants, ACD Landscape Architects have produced a 'Landscape and Visual Impact Assessment', which refers to the LI/IEMA Guidelines for Landscape and Visual Impact Assessment (GLVIA). Although not intended as a prescriptive set of rules, the GLVIA represents a well-used methodology. ACD's report includes an assessment of views into the site from a number of public and private spaces that neighbour the proposed site. These include the raised footbridge over A280; the Public footpath to Highdown Hill; the public footpath running along Cow Lane; the public footpath to the south; and, from residential properties on Roundstone Lane. All of these viewpoints are either adjacent to the site, or within no more than 450 metres from the site.
- 5.19 The ACD Landscape Report concludes that both the proposed site itself and the local landscape in general, are assessed as having medium / low landscape sensitivity. During construction, and due to the sensitivity of the large majority of 'visual receptors' in closest proximity to the proposed construction activities would result in a significance of effect that can be assessed as Major (i.e. "Significant"). Table 12 of their Assessment (Fig. 3 below), details that from the majority of viewpoints the development would have a moderate, major or significant impact.



1. *Introduction*



2. *Methodology*

3. *Results and Discussion*



4. *Conclusion*

5. *References*



6. *Appendix*

7. *Notes*



8. *Index*

9. *Summary*



10. *References*

11. *Notes*



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13. *Summary*



14. *References*

15. *Notes*



16. *Index*

17. *Summary*



18. *References*

19. *Notes*



20. *Index*

21. *Summary*



22. *References*

23. *Notes*



24. *Index*

25. *Summary*



26. *References*

27. *Notes*



28. *Index*

29. *Summary*



30. *References*

31. *Notes*



32. *Index*

33. *Summary*



34. *References*

35. *Notes*



36. *Index*

37. *Summary*



38. *References*

39. *Notes*



40. *Index*

41. *Summary*



42. *References*

43. *Notes*



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No	Viewpoint	Receptor Type	Receptor Sensitivity	Magnitude of Change	Significance of Visual Effect	Magnitude of Change	Significance of Visual Effect
				Operation of Stage		Residual Stage	
1	Raised footbridge over A385	Users of outdoor recreational facilities	High	Medium	Major/moderate	Medium	Major/moderate
2	Public footpath to Highdown Hill	Users of outdoor recreational facilities	High	Medium	Moderate	Small	Moderate
3	Public footpath to Highdown Hill	Users of outdoor recreational facilities	High	Small	Moderate	Small	Moderate
4	Cow Lane	Users of outdoor recreational facilities	High	Large	Major	Large	Major
5	Footpath on Rugby Ground boundary	Users of outdoor recreational facilities	High	Large	Major	Medium	Moderate
6	Roundstone Lane	Residential	High	Large	Major	Large	Moderate
7	Roundstone Lane	Residential	High	Large	Major	Large	Moderate

Fig 3. ACD's Summary and Comparison of Residual Visual Significance Effects

- 5.20 ACD suggests that significant landscaping would assist in mitigating against the harm the development would create. However, they indicate that a period of 15 years would be required for this landscaping to mature to have a notable effect. Even after such a considerable period of time, the development would still have a considerable impact on the wider landscape and from important viewpoints, not least from the South Downs National Park and adjacent Conservation Area.
- 5.21 The character of views across the site would clearly be changed. The open grassland and scrub would be replaced by houses and boundary treatments. Surrounding footpaths are well used by the general public for recreational walking and while the existing urban edge is already apparent from many of these footpaths, its present degree of separation would be materially reduced. Taken together, these factors would amount to a substantially adverse visual impact, with significant landscape harm being apparent.
- 5.22 In summation, the proposed site is set at a relatively low level and is fairly flat. It is positioned adjacent to the raised South Downs National Park to the northeast and the Conservation Area to the northwest. There are a number of public footpaths that run adjacent to the site and afford clear views into the site. In addition, Roundstone Lane and properties to the west also have views into the site. It is acknowledged that the development will generally have a 'significant' or 'major' effect on the landscape and visual quality of the area. This is exacerbated by the developments incursion into the otherwise undeveloped eastern side of





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Roundstone Lane. It is suggested by ACD's report that landscaping to the sites boundaries will mitigate against this harm. However, it is acknowledged within their report that this could take 15 years to mature, and even then, a level of visual harm would remain.

- 5.23 It is clear that given the importance of the site's location in landscape terms that the proposed development would be harmful in this respect, and for this reason the planning application should be refused, as the development conflicts with the requirements of ADLP Policies GEN7, GEN20 and GEN27, which require developments to provide high quality landscaping, open space and to take full account of the landscape characteristics of the locality.

Conservation Area / Heritage issues

- 5.24 Angmering Conservation Area is located to the northwest of the application site, and there are also Listed Buildings nearby also – most notably 'Pound House', the rear boundary of which forms part of the northern boundary of the application site. There are also a number of other Listed Buildings further to the north of the site. The extent of the Conservation Area is indicated in the image below by the dotted dark blue line (Fig. 4).
- 5.25 Although the applicants outline within the submitted Design & Access Statement (prepared by Barratt Urban Design, dated July 2012) how the design principles used for this proposal are informed by four key distinctive areas of the existing village (the historic area, the village core, the green edge, and mews style development), the impact on the Conservation Area and the setting of Listed Buildings is not discussed.
- 5.26 Most critically, there is no Heritage Statement included within the application. The proposed development would potentially impact upon the setting of the adjacent Conservation Area and Listed Building's. Therefore an assessment of the impact of the proposals upon the heritage significance of the building is required as part of the planning process.



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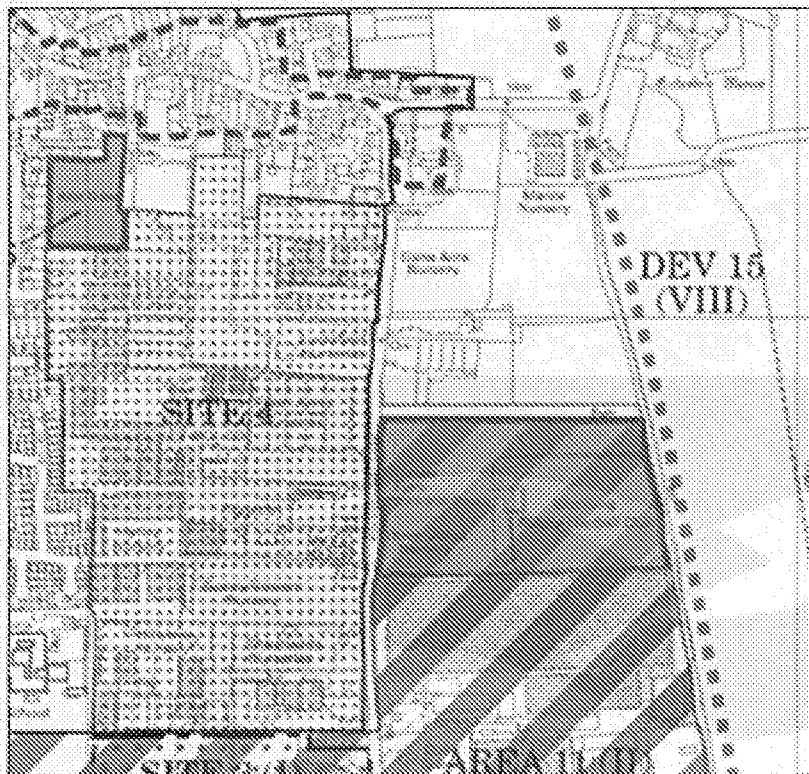


Fig 4. Extract from the ADLP (2003) Proposal Map

- 5.27 The Government's aim is that the historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations. To achieve this, the Government's objectives for planning for the historic environment are to conserve England's heritage assets in a manner appropriate to their significance by ensuring that decisions are based on the nature, extent and level of that significance, investigated to a degree proportionate to the importance of the heritage asset.

Archaeological Heritage

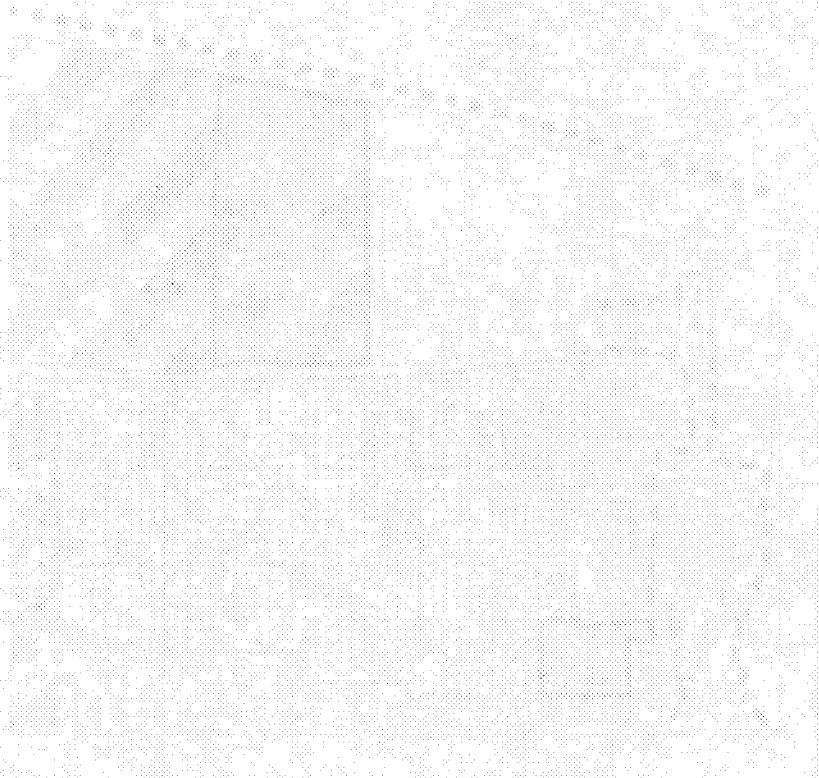
- 5.28 The submitted "Archaeological Desk Based Assessment for Land off of ROUNDSTONE LANE ANGMERING" states:

- *"The site is in close proximity to a series of multi-period sites, the historic settlement of Angmering and the Post Medieval Ecclesden Manor and Pound House. As such there is the potential for archaeological remains from the Neolithic through to the Post Medieval period";*





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- *There have been various excavations within the vicinity of the site including work to the west of Roundstone Lane, where Bronze Age through to Post Medieval deposits were recorded. Sites have also been recorded around Ecclesden Manor a Grade II listed building, to the north east dating from the Bronze Age through to the Post Medieval; and,*
- *A possible small Bronze Age farmstead and later Roman activity has also been recorded along the Angmering by-pass."*

5.29 Paragraph 169 of the NPPF highlights the need to make an assessment of the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. The assessment also states that: *"Arun District Council is also bound by the saved policies within the Arun District Local Plan (adopted April 2003). The relevant policy contained within the Local Plan is as follows:*

Saved POLICY AREA 17 - "Sights of Archaeological Interest", states that: "Permission will not be granted for development that would be harmful to the significant archaeological interest of a site. Where the presence of archaeological remains is known or suspected".

5.30 The archaeological assessment of this site concludes, that:

"8.2. The potential for Prehistoric evidence on the site is high . . . Any identified Prehistoric deposits would be of regional significance and would contribute to the understanding of the multi-period landscape."

"8.3. The potential for archaeological deposits dating to the Roman period on the site is high as numerous sites, often in multi-period sites, have been identified within the immediate vicinity of the site including the Angmering by-pass and to the west of Roundstone Lane. Any surviving Roman deposits would be of regional significance and would contribute to an understanding of wider landscape during this period".

"8.6. The groundworks associated with the construction of residential properties, access roads and the laying of services are likely to substantially disturb any preserved archaeological deposits on the site".

"8.7. There is a high potential for multi-period deposits to be present on the site with notable activity to the west and north east. Any surviving archaeological deposits have the potential to contribute to the understanding of this multi-period activity to the south east and east of Angmering"

5.31 There have been other discoveries from the Arun district coastal plain which were similarly 'blank' before evaluation predetermination or investigating by





1. Введение. 1.1. Общие сведения о проекте. 1.2. Цели и задачи проекта. 1.3. Описание проекта. 1.4. Результаты проекта. 1.5. Заключение.

2. Описание проекта. 2.1. Общие сведения о проекте. 2.2. Цели и задачи проекта. 2.3. Описание проекта. 2.4. Результаты проекта. 2.5. Заключение.

3. Заключение. 3.1. Общие сведения о проекте. 3.2. Цели и задачи проекта. 3.3. Описание проекта. 3.4. Результаты проекта. 3.5. Заключение.

4. Приложение. 4.1. Общие сведения о проекте. 4.2. Цели и задачи проекта. 4.3. Описание проекта. 4.4. Результаты проекта. 4.5. Заключение.

5. Литература. 5.1. Общие сведения о проекте. 5.2. Цели и задачи проекта. 5.3. Описание проекта. 5.4. Результаты проекта. 5.5. Заключение.

6. Заключение. 6.1. Общие сведения о проекте. 6.2. Цели и задачи проекта. 6.3. Описание проекта. 6.4. Результаты проекта. 6.5. Заключение.

7. Приложение. 7.1. Общие сведения о проекте. 7.2. Цели и задачи проекта. 7.3. Описание проекта. 7.4. Результаты проекта. 7.5. Заключение.

8. Литература. 8.1. Общие сведения о проекте. 8.2. Цели и задачи проекта. 8.3. Описание проекта. 8.4. Результаты проекта. 8.5. Заключение.

9. Заключение. 9.1. Общие сведения о проекте. 9.2. Цели и задачи проекта. 9.3. Описание проекта. 9.4. Результаты проекта. 9.5. Заключение.

10. Приложение. 10.1. Общие сведения о проекте. 10.2. Цели и задачи проекта. 10.3. Описание проекта. 10.4. Результаты проекта. 10.5. Заключение.





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archaeological planning condition. Sites which contain no known heritage assets should not be assumed to be devoid of features.

- 5.32 It is therefore our view that the Council request that the site is sampled by field investigation before the determination of the application.

Loss of Agricultural Land

- 5.33 It has been brought to our attention that the site is classified as Grade 1 Agricultural Land. In our view, areas of Brownfield land should be used in preference to that of higher quality, except where other sustainability considerations suggest otherwise. As such, it is clear that there are far more preferable sites for development than that currently proposed.

Tree Protection

- 5.34 ACD Arboriculture has prepared a Tree Report which informs that 12 Category 'A' or 'B' trees are sited within or adjacent to the application site. These are trees that should be retained, and the development should not impact on these trees or their Root Protection Areas (RPAs). According to the same company's Arboricultural Impact Assessment, only one Category 'A' tree is to be affected by this proposal – that is an English Oak (ref: T22), which requires a crown lift western side to 4m only, to improve driveway clearance. This is not considered significant. A small number of other trees are to be removed, but these are all classified as poor specimens that have little or no landscape/visual amenity value and/or are in poor health and therefore require removal.
- 5.35 The proposed landscape plans suggest that a number of trees within the site would be planted, and this comfortably off-sets the loss of any trees. In this regard only, the visual quality at the rural-urban edge of this part of Angmering may be partially improved by the proposal. However, any benefits will be comprehensively undone by the scale, positioning, and amount of development that is proposed. This is all the more so because the scope to plant trees which will have a meaningful impact on their surroundings, even in the long term, is very limited in such a relatively high density layout.

Flooding and Drainage

- 5.36 According to the Arun District 'Strategic Flood Risk Assessment' (SFRA), which was published in 2008, almost the entirety of Angmering, including the application site, falls within an area defined as being at medium to high risk of flooding from the land (Map L). There have been historic instances of fluvial and surface water borne flood events close to the application site (Map H refers). In addition, the village of Angmering is affected by Fluvial flood risk (Map F-1 refers).
- 5.37 The applicants have commissioned the MJA Consulting to prepare a Flood Risk Assessment (FRA) on these issues. This report highlights the site as being located within Flood Zone 1. In accordance with the NPPF, the FRA concentrates on surface



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water run-off issues, but does not satisfactorily address ground water flooding issues, and also raises concern with regard to surface water run-off.

- 5.38 The "Pre-Purchase Desk Study & Preliminary Ground Investigation" prepared by Wilson Bailey Partnership, provides the results of groundwater level monitoring that was carried out over the winter period between October 2011 and March 2012, from 4 boreholes across the site. The resulting evidence states that the monitoring *"has not indicated the presence of groundwater to a depth of at least 6.0 m below ground which is the maximum depth of investigation at this site. Localised pockets of surface water were noted, representative of perched water trapped upon the upper layers of assumed low permeability clay encountered across the site"*.
- 5.39 Significantly, the test period coincided with the end of the second driest period in the region since records began, which in April 2012, resulted in Southern Water imposing a "hosepipe ban" to combat drought after two exceptionally dry winters. The report then goes on to make the assumption that, as a result of these findings, *"groundwater is unlikely to be encountered within shallow excavations for foundations and services"*.
- 5.40 Based on the unfortunate timing of these tests, it is our view that the evidence provided in this document is flawed and the applicant should request that the monitoring work be re-done. Regardless of this, Page 6, of the document also states that *"There is a geotechnical requirement for additional ground investigation - excavation stability."*
- 5.41 At para. 3.2.8 the FRA states *"Further ground investigations and soakage testing should be carried out to ascertain soil infiltration rates for the potential use of soakaways."* Given that that SHLAA updated, which was published in May 2012 confirms that the site is located within an area designated as a groundwater emergence zone, and there is a recognised potential for groundwater flood risk, we contend that full modelling and investigation is required at this stage. The FRA also accepts that further work is required, for instance at para 5.4 the report suggests that a heavily vegetated part of the site to the rear of Manor Nursery has a surface depression which *"could possibly be surface water storage associated with the adjacent Angmering Bypass. Further investigations will be required..."* and at para 5.5 when discussing groundwater, the report states *"further monitoring of the groundwater levels will be required to determine seasonal fluctuations..."* whilst also accepting that *"Ponding may occur on the permeable surface at various locations throughout the site during heavy rain events..."* This was observed in the "Pre-Purchase Desk Study & Preliminary Ground Investigation" report prepared by Wilson Bailey Partnership (see above).
- 5.42 Given the potential impact of the development with 50% of the existing site area being proposed to become 'impermeable' (para 6.1 refers), which equates to an





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extremely substantial 3.4 hectares of land, and given the proximity to watercourses nearby, these statements are of considerable concern. Making half the site area impermeable area is likely to increase the potential for surface water to run off from the site and post occupation, the impermeable area is likely to intensify as further built form is added (for example, residents will build extensions, patios, erect sheds, greenhouses etc).

- 5.43 At para. 3.3.3 the report also states *"The site has no reported history of flooding from all sources."* As alluded to above, this is a clearly incorrect statement. Local people have experienced firsthand a number of occasions Angmering has flooded. For Angmering, surface water and groundwater flooding is a real problem, having been experienced as recently as 14th June 2012. Evidence of other recorded events is as follows:
- On 15th January 2008 32mm of rain fell on Angmering causing flooding at Hammerpot (Angmering Village Life (AVL) website).
 - In 2002 there was flooding in Angmering (JDAC Progress Statement - Agenda Item 6)
 - The "Preliminary Report on Flooding In the Parish of Angmering" prepared by Rofe, Kennard & Lapworth, Consulting Engineers dated 9 September 1981 refers to flooding in the village on three separate occasions:
 - 20th September 1980
 - 10th October 1980
 - 2nd June 1981
- 5.44 All these flood events were put down to a combination of exceptionally heavy rainfall, blocked drainage ditches and culverts and inadequate pipe diameter. The June 1981 flood was the most severe, with sewage in the flood water.
- 5.45 A SuDs drainage strategy is suggested, with considerable weight put on the utilisation of infiltration. However, again, the report states that further investigation is required on this issue, *"Subject to further testing the entire surface water runoff from the development for all storm events up to and including the 1:100year +30% climate change will be discharged via infiltration to the ground."*
- 5.46 Our opinion is that inadequate information has been provided for a decision to be made on this issue. Given the existing flooding issues in the village, these issues cannot be left to a condition. A full and robust investigation of the feasibility of the drainage strategy proposed, together with groundwater and surface water flooding needs to be carried out now.
- 5.47 This application is for 'full' planning permission. As such a more detailed FRA is needed now. No consideration has been given to the wider watercourse network in





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Angmering and no hydraulic modelling of the watercourses has been carried out. In order to get a true picture of what happens when Angmering floods and hence see the true impact of the proposed development, this work is necessary before any decisions are made.

- 5.48 In terms of foul drainage, it is stated that Southern Water have confirmed that there is sufficient capacity in the existing system to accommodate a further 150 homes without requiring improvement. The report states that *"The foul water discharge from each property will drain via gravity through the private house drainage before out falling to a sewer system within the development road network. This sewer will drain via gravity to a pumping station located at the southern boundary of the development site. A rising main will pump flows back up through the site, running offsite north along Roundstone Lane ultimately discharging in to the existing Southern water foul sewer within High Street."*
- 5.49 There is no confirmation on whether the surface water and foul drainage systems proposed are to be adopted, which raises concerns over management and maintenance of these systems. Our understanding is that sewage from the site will flow to the High Street and then onward into the village centre where there have been problems with sewage and surface water flooding as recently as 2012.
- 5.50 Based on our assessment of the information submitted, there is considerable concern the development would exacerbate existing drainage and flooding issues locally, and as such the proposal would fail to comply with Policy GEN9 of the ADLP.

Ecology

- 5.51 The site lies on the edge of the South Downs National Park, and it is understood that there are 3 Sites of Importance for Nature Conservation (SINC) within 1-2km of the application site.
- 5.52 The applicants have commissioned Aluco Ecology Limited to undertake ecological surveys of the area, and a report has been produced in support of the application.
- 5.53 The report identifies that the site comprises grassland that is of value, and a number of internal established hedgerows that are of habitat importance. This includes a hedgerow running north-south through the centre of the site which is, under the Hedgerows Regulation 1997, considered to be "important" and as such is of local nature conservation value. The central north south hedgerow will be partially retained within the landscaped area with breaks to facilitate access and views in areas, but the canopy corridor will be retained where possible, according to the Aluco report. The grasslands on site will be developed and therefore lost as a part of the scheme. It is evident that the important habitat and landscape feature will be removed, and as such the ecological value of the site will be negatively impacted upon. This is unacceptable, and we suggest that the layout of the site is





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reconsidered to allow for the retention of established and important grassland and hedgerow features.

- 5.54 In terms of wildlife, the Aluco Ecology Ltd report states that although no bat roosts have been identified on site during their survey work, the habitats on site provide potential foraging and commuting opportunities for local populations of bats. The bat species that were recorded using the site were defined as being of local value. The new development may impact on the feeding activities on these bats.
- 5.55 No evidence of badgers or any other protected species were found to be present on site.
- 5.56 Our view is that if this development is to take place, it warrants additional ecological enhancement measures being undertaken. Some landscaping is proposed, but the scheme would be improved by the provision of more open space, and perhaps a grassland / nature reserve, which would have to be adequately buffered. In addition it is suggested that a package of further on-site features to benefit local wildlife should also be considered in order to mitigate against the destructive removal of existing grassland and other landscape features that provide habitat to so much wildlife. The site is 'hemmed in' by the A280 to the east, Roundstone Lane to the west, housing to the north and the Rugby Club to the south. Without mitigation, the existing wildlife will struggle to successfully translocate to suitable alternative habitat.

Transport, Access and Parking

- 5.57 A separate report regarding these issues has been prepared by David Bell of LGPS Resources Transport Consultants, on behalf of SAV. In order to avoid repetition we will not comment any further on this matter within our report.

Noise

- 5.58 A noise survey of the site has been undertaken by 24 Acoustics. Their report identifies that the site falls within Noise Exposure Category B of the former PPG24, which stated that *"noise should be taken into account when determining planning applications, and where appropriate, conditions imposed to secure an adequate level of protection against noise"*.
- 5.59 In this case, the proposals include for the houses closest to the A280 to have alternative means of ventilation for habitable rooms facing onto this highway. Although not an ideal scenario for the occupants of these houses, this measure is accepted in planning terms as being suitable. A further impact is the potential noise from the adjacent rugby club impacting on future residents at the south end of the site. In this regard mitigation in the form of a 2m high acoustic barrier/fence is proposed along the mutual boundary.





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- 5.60 Taking this report as correct, we see no reason why any noise issue cannot be mitigated against, and therefore in planning terms there appears to be no reason to object on this ground.
- 5.61 However, the sample was taken at a single location, and the noise measurement instrumentation appears to have been located at the widest point between the site boundary and the A280, at almost twice the distance from the A280 than the boundary in the north east and south east corners of the development. This is not immediately obvious from the aerial image in the document. See extract below:

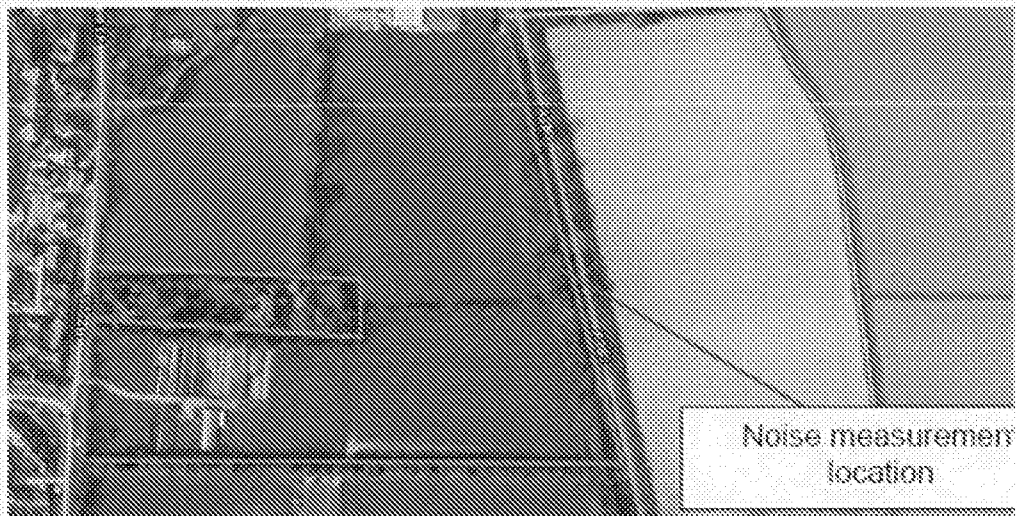


Fig. 5: Extract of Plan showing location of Noise Measurements

- 5.62 The red arrow in Fig. 6 below shows the approximate location and distance from the edge of the A280 to the site boundary using the "**Landscape Strategy Plan**", which provides a much more accurate aerial view of the site.



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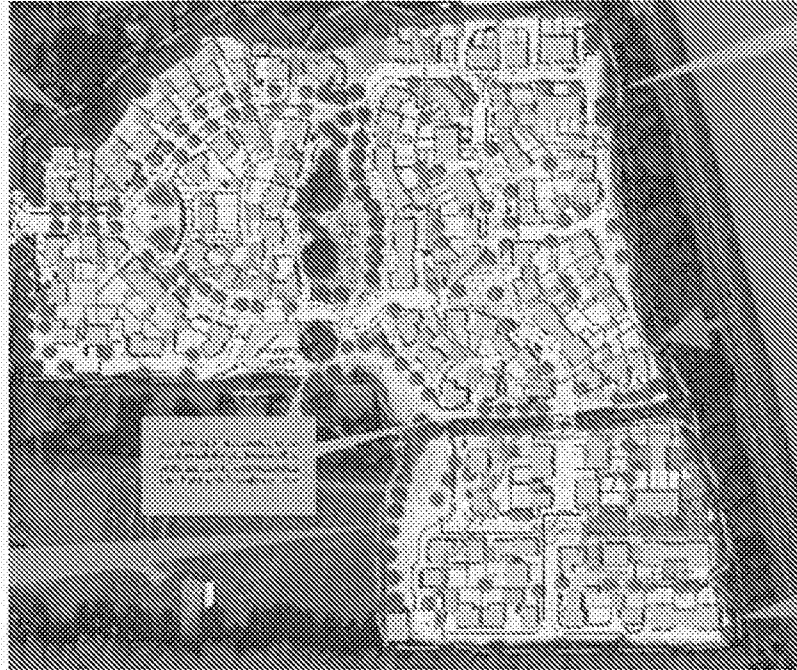


Fig 6. Approximate Location of Noise Measurement Instrumentation

- 5.63 Readings taken, show that *"maximum typical night-time levels were in the order of 72 dB"*. No maximum figure was provided for the Daytime period. The average noise levels were calculated at Night-time: 54.5 dB; and Daytime: 61.5 dB. Both readings fall just inside the upper limits of Noise Exposure Category B, which are Night-time 45 dB - 57 dB and Daytime 55 dB - 63 dB.
- 5.64 Point 3.9 in the document quotes the World Health Organisation which says that, *"in order to prevent significant community annoyance, noise levels in outside living spaces (gardens, terraces, balconies) should not exceed 55 dB LAeq, 16 hour (between the hours of 07:00 and 23:00)"*. We can find no further reference to this figure in the document.
- 5.65 The report finds that: *"The results indicate that the area of the site closest to the A280 will fall within Noise Exposure Category B of PPG 24"*. We do not believe that noise levels at the north and south east corners of the site (where affordable houses are located which are much closer to the A280 and in all probability will exceed these averages), should be based on an "indication" of a measurement taken at the furthest point from the A280.



The first part of the paper discusses the general principles of the method of moments (MoM) for the analysis of periodic structures. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The second part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The third part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The fourth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The fifth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The sixth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The seventh part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The eighth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The ninth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. The tenth part of the paper presents a detailed analysis of the MoM for the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties. It is shown that the MoM can be applied to a wide range of problems, including the analysis of periodic structures with arbitrary cross-sections and arbitrary material properties.





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- 5.66 Therefore, in our opinion, the applicants have failed to provide noise figures that give a reasonable idea of the noise levels that can be expected on parts of the site that will be the most affected by noise from the A280.
- 5.67 We suggest that the Council, before it considers this application, examine this point further, and request the applicant provides additional measurements of the noise levels at the locations closest to the highway, and also shows at what point(s) across the site noise levels fall into "Noise Exposure Category A. of PPC 24", and update their report accordingly.

Other Matters

- 5.68 It is disappointing to note that the supporting documents submitted with the planning application are in part out of date, (in that they were undertaken a number of months prior to the application being submitted), and in part referring to a larger site area that does not now form part of this current application.
- 5.69 For clarity we request that the Council examine this further, and where necessary seek for the developer to update the supporting reports in order to accurately relate to the current application site only.

6.0 Conclusions

- 6.1 It is considered that the development of this site is not required to meet any shortfall in housing within the Arun District. The Council is currently able to demonstrate a 5 year housing supply, and therefore, in accordance with para.49 of the NPPF, the relevant policies for the supply of housing can be considered up-to-date. The development falls within the defined countryside where new housing will be resisted unless there are exceptional circumstances, such as an overriding need or public interest. In this case there are no special circumstances that require the approval of this development.
- 6.2 The emerging Local Plan proposes two housing provision Options for Angmering. Option 1 requires just 100 houses across the Plan period, whilst Option 2 (if for some reason the SEP is not revoked, as is clearly intended under the provisions of the Localism Act) requires the village to provide 490 dwellings over the Plan period.
- 6.3 The 2012 SHLAA update details that three other sites are more favourable than this application site. The most favourable site that is considered under the SHLAA is site ref: 101 (Land south of Bramley Green/north of Mayflower Way), which lies within the built-up area boundary, and has a suggested yield of 100 dwellings. If this site does not come forward, then sites 109 (175 units) and 82 (380 units) are considered most preferred under the SHLAA. Cumulatively these sites could provide 655 dwellings, far excess of that required by emerging ADLP Policy SP8





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Республики Казахстан

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«Казахстанская академия
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Астана, 2024

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УЧРЕЖДЕНИЕ ОБРАЗОВАНИЯ
«КАЗАХСТАНСКАЯ АКАДЕМИЯ
«АСТАНА»





**RODWAY PLANNING
CONSULTANCY**

under the 'worst case' scenario of Option 2. Therefore, there is no requirement for this site to be developed at this time, and it would be wholly premature to grant planning permission now.

- 6.4 The SHLAA also states that this site **could** be suitable for future development, but **only** as part of a larger, comprehensive land assembly, including adjacent land. On the basis of this assessment, and the findings in this document, the sustainability of this application is highly questionable. The SHLAA is not a Policy document, and in any event the 2012 SHLAA gives the projected timeline for any development on this site as between 2018 – 2022.
- 6.5 There is a good case for refusing the proposal insofar as it relates to Open Space, form of development and its relationship with its surroundings, impact on the landscape and wildlife habitat. Specifically the development will appear overly dense and will project into the open countryside on the otherwise undeveloped eastern side of Roundstone Lane. This area provides the village with a buffer between the developed 'built-up area' to the north and west, and the A280 to the east. To provide development in this countryside location will completely degrade the setting of the village when viewed from the South Downs National Park and other nearby public viewpoints. Further the proposal may result in the loss of land classified as Grade 1 agricultural land, which should be maintained as such.
- 6.6 The proposal suggests a poor housing mix. Additionally the application is lacking in regard to certain critical issues, for instance, there is no Heritage Statement, and the FRA does not seem to be based on any robust survey or investigation work, with regular comments that further work is required. There are valid concerns relating to infrastructure and accessibility also.
- 6.7 We have also highlighted a number of concerns about the quality and relevance of the technical information that has been provided in support of this application. SAV respectfully request that the Council investigate these before considering the application. Notably, the validity of the ground water measurement figures and the noise level measurement approach. Also, assumptions that have been made on key infrastructure availability, provision or suitability, such as whether the existing sewerage infrastructure can cope with any additional new housing; school places are available, evidence that the site can reasonably be considered as a "short walk" from schools, shops and services.
- 6.8 For the reasons outlined above, we **OBJECT** to this application, as submitted on behalf of SAV and respectfully request that this application is Refused Planning Permission.

September 2012



