POST 1/6

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ARUN DISTRICT COUNCIL
TECHNICAL SUPPORT
- 6 NOV 2012
ACTION
FILE

Peter Cleveland,
Case Officer,
Planning Department,
Arun District Council,
Arun Civic Centre,
Maltravers Road,
LITTLEHAMPTON,
West Sussex. BN17 5LF

6 November 2012

Dear Peter,

Angmering Parish Council OBJECTS to Planning Application A/82/12, for 'Residential development comprising 150 no. Dwellings including 30% affordable with access, landscaping, open space & associated works', for the reasons detailed below.

The objection is based on a number of grounds, the details of which are contained in the attached appendices A to V, all of which should be treated as **material considerations**.

A summary of the appendices and a bibliography are also attached.

Contravention of Planning Policies

- There is no current **need** to identify additional land as Arun District Council has shown that it has more than 5-years of deliverable supply. (Clause 47 of the NPPF refers).

- The site falls outside of the Angmering village built-up area boundary, and is classified as countryside. As it is a **rural** location the only allowable developments should be that of Rural Exception Sites and not major developments. (GEN 2 of the 2003 Local Plan and SP 2 of the Draft one refer).

- The development is a Greenfield site and is proposed on part of the gap between the built-up area boundary and the South Downs National Park . Brownfield sites should be developed before Greenfield (saved policy GEN 3 of the old Plan and SP 2 of the new one refer).

- The site is grade 1 agricultural land and as there is no demonstrable need to do so, no development should occur on this land. (Policy Area 12 & Policy DM8 in its replacement refers).

- It is a groundwater emergence site and has the potential to exacerbate existing drainage and flooding issues locally. (Policy GEN 9 & GEN 11 in the old Plan and SP 24 & DM 40 in its replacement apply.) (ref: Appendix K)

- NPPF core planning principals say that Local development should be Plan led. Given the emerging status of both the Draft local Plan for Arun and the Angmering Neighbourhood Development Plan (ANDP), development on a site, which may or may not be identified for housing when properly evaluated through the democratic development plan process, would pre-empt the emerging Local Plans and resultant core strategy planning. Granting permission to this application could also prejudice the ANDP by predetermining decisions concerning the location and scale of housing development. No need has been demonstrated for the building of 150 houses on this site. This application must therefore be viewed as **Premature**.

- Angmering has already absorbed a development of 650 units in the last 10 years which increased the population by 35% and is agreed by parishioners, to be the limit in terms of future large, one-off developments and of what can reasonably be deemed as sustainable in terms of current infrastructure and services. Reference should be made to Arun District Council's report 'Bramley Green Residents' Survey 2004, a summary of which is shown at Appendix M. Roundstone Lane is the boundary limit for development and this should be retained to keep the special character and nature of this historic village and the social cohesion and inclusion of its community, intact. (ref: Appendix M)

Errors and Omissions within the Application

The application is for **Full Planning Permission**, which requires **all** supporting Statements and details to be included and current. However, there are a number of areas where it is stated that further work needs to be done.

- There is no Environmental Impact Assessment. (ref: Appendix F)

- The emerging Angmering Neighbourhood Development Plan and the views of the community members have been disregarded. No attempt was made to delay the application to allow the emerging Neighbourhood Development Plan to be developed, taking on board the views of the community.

- No Tree Risk Assessment has been carried out. (ref: Appendix I)

- No evidence is provided as to how the negative effects on hedgerow and 'at risk' species are to be accommodated within the site. (ref: Appendix Q)

- A general lack of information is provided on this under Landscape Management and Maintenance, other than an unrealistic expectation of future residents maintaining areas

outside of their gardens which, together with insufficient expectations in play area maintenance, mean there is a danger of the site becoming desolate. (ref: Appendix I)

- Landscape and Visual Impact Assessment – The Landscape and Visual Impact Assessment is inadequate having been carried out when trees were in full leaf; it therefore vastly underestimates the visual effect of the site. (ref: Appendix H)

- There is no attempt to provide evidence that the proposal will not cause flooding on site or elsewhere, given that it is in a groundwater emergence zone. (ref: Appendix K)

- Appendix D to the Flood Risk Assessment & Development Drainage Strategy was not included, giving no assessment results of the estimated Greenfield runoff. (ref: Appendix K)

- Ground Investigation – the Ground Investigation test was carried during the second driest winter on record. The conclusions are therefore unrepresentative. (ref Appendix T)

- The conclusions of the Ecological Assessment are not supported by the report. (ref: Appendix Q)

- The Air Quality report, utilises outdated data and therefore underestimates the effects of increased traffic caused by subsequent development of Haskins, ASDA etc. (ref: Appendix S)

- The current noise impact levels on the site were measured as being at the top-end of acceptable levels. These were conducted from an unrepresentative site location, which itself underestimates the ambient noise levels experienced within the majority of the affected area. (ref: Appendix P)

- The Transport Assessment refers to a footpath that does not exist; the Safety Audit was carried out on the original larger site; the TRICS survey was carried out using the wrong base information and all the data used was collected during 2011, before the effects of recent relevant planning decisions could be measured. (ref: Appendix L)

- Constant reference is made to Urban Expansion – Angmering is a Rural Community with a population considerably below the minimum 10,000 classified as being Urban. Such reference is misleading and the associated guidance inappropriate. (ref: Appendix D)

- Full Archaeological assessment required (supported by WSCC document). (ref: Appendix R)

Sustainability Issues

The NPPF requires development to be **sustainable** and the application repeats that this is the case. Sustainability has three elements to it requiring attention to be paid to the economic, environmental and social effects. There are many questions as to whether this application satisfactorily demonstrates the sustainability of the development.

- Economic sustainability – there are no local jobs to support the occupants of these properties. The village already has 60% of people in work travelling more than 5 miles to and from work each day (source Neighbourhood Plan Survey Results 2012). The proposed

development would therefore add considerably to private car usage within an increasingly over stretched local network. (Refer Appendix M –Bramley Green effect)

- Environmental Sustainability – the problems described above with the various reports produced by the developer, result in there being grave concerns that this has not been proved. There will be excessive additional car travel, compounded by an inadequate (and likely to get worsen) bus service. Poor site design results in the most vulnerable and less capable having the longest journeys to schools, village shops and doctors. Additionally, the destruction of an important green field including trees and important hedgerows, will materially affect wildlife and the visual impact of and from the site.

- Social Sustainability – the proposal to put 50% of the affordable housing in one corner of the site, next to the noisy and environmentally unpleasant A280 by-pass; in a location which the plan shows will be heavily shaded by trees to both the east and southern boundaries, and which the Noise Assessment adds will be subject to additional noise from the Rugby club, will mean that the occupants, who will be the least advantaged to start with, are further compromised.

- Reference should be made to the attached Appendices to this letter for the demonstration of the **unsustainable** nature of this proposal where attention has been paid to each of the supporting documents contained within the application pack.

Principles

The Coalition Agreement of May 2010, stated that the Government would 'rapidly abolish Regional Spatial Strategies and return decision-making powers on housing and planning to local councils.' On 6th July 2010, in a written statement to the House of Commons, the Secretary of State for Communities and Local Government - Eric Pickles - announced that Regional Spatial Strategies (i.e. South East Plan (SEP)) would be revoked.

A timeline of the changes in government Planning Policy, against which this application has been assessed, can be found in Appendix A to this submission, entitled "Government & Local Guidelines and Policies."

The proposed development has elicited strong opposition from parishioners, who since the release of the 2009 SHLAA, have seen a number of speculative applications by housing developers. It is the parishioners' view that developers are rushing to bring forward their planning applications, in an attempt to take advantage of the current transitional period before the SEP and associated Regional Policies are finally scrapped and Neighbourhood plans are in place.

This is evident in the poor quality of the Planning Statement supporting this Full Planning Application; submission of support documentation which, in some cases, are "initial" assessments; including information which is out of date or incomplete; missing supporting evidence where documents state that further work needs to be done.

The residents of Angmering accept the need for some new housing but at sustainable levels and built in sustainable locations. The new planning process will allow the villages, through their neighbourhood plans, to manage this with local consent. This process must be allowed to succeed. Approval of this planning application will undermine the Government's principal of local determination over development and the emerging Arun Local Plan and Neighbourhood Plans that the Parish Councils are in the process of compiling.

Angmering Parish Council - for the reasons outlined in this submission - regard this application as unsustainable. It is opportunist in its attempt to undermine the Government's reforms to housing and planning policy (which seeks to bring decision-making as close to the affected communities as possible) and premature in relation to emerging Local and Neighbourhood Plans.

On behalf of our parishioners, Angmering Parish Council **strongly objects** to this application.

Yours faithfully

[redacted]ncil

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

LIST OF APPENDICES

A. Government & Local Guidelines and Policies

B. Principles of Development

C. Consultation Process

D. Definition of Urban and Rural for Policy Purposes

E. Comments on the Application

F. Planning Statement including Statement of Community Involvement

G. Matters of Concern in the Design and Materials Statement

H. Landscape and Visual Impact Statement

I. Tree Report, Arboricultural Report & Landscape Management Report

J. Open Spaces and Play Facilities

K. Flood Risk Assessment and Development Drainage Strategy

L. Infrastructure - Transport Assessment

M. Bramley Green Residents Survey 2004

N. Minutes of the Angmering Neighbourhood Development Plan Steering Group meeting of 24th January 2012.

O. Minutes of the meeting of Angmering Parish Council on 12th March 2012.

P. Noise Impact Assessment

Q. Ecological Assessment

R. Archaeological Assessment

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ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

GOVERNMENT & LOCAL GUIDELINES AND POLICIES

1. Planning Application A/82/12 was submitted to Arun District Council by Barratt & David Wilson (Southampton) Ltd on **30th July 2012**. The following provides a brief description and timeline of the changes in Planning Policy and the emerging Local Plan against which this planning application has been assessed.

2. **May 2010**: The Government announced in the Coalition Agreement its intention to *"rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils"*

3. **13th October 2011:** The Communities & Local Government, ***"Introduction to Neighbourhood Planning"*** was published, which stated:

> *"Neighbourhood planning is a new way for communities to decide the future of the places where they live and work. They will be able to:*
> - *choose where they want new homes, shops and offices to be built*
> - *have their say on what those new buildings should look like*
> - *grant planning permission for the new buildings they want to see go ahead"*
>
> *"In areas with a parish or town council, the parish or town council will take the lead on neighbourhood planning. They have long experience of working with and representing local communities."*
>
> *"If the local planning authority says that an area needs to grow, then communities cannot use neighbourhood planning to block the building of new homes and businesses. They can, however, use neighbourhood planning to influence the type, design, location and mix of new development."*

4. **June 2011: "A Plain English Guide to the Localism Bill"** was published by Communities & Local Government to provide an overview .... It included the following sections:

> ***Clarifying the rules on predetermination:***
> *"The Government intends to use the Localism Bill to clarify the rules on 'predetermination'. These rules were developed to ensure that councilors come to council discussions - on, for example, planning applications - with an open mind. In practice, however, these rules have been interpreted in such a way as to reduce the quality of local debate and stifle valid discussion. In some cases councillors have been warned off doing such things as campaigning, talking with constituents, or publicly expressing views on local issues, for fear of being accused of bias or facing legal challenge."*
>
> *"The Localism Bill will make it clear that it is proper for councilors to play an active part in local discussions, and that they should not be liable to legal challenge as a result. This will help them better represent their constituents and enrich local democratic debate. People can elect their councillor confident in the knowledge that they will be able to act on the issues they care about and have campaigned on."*
>
> ***Local referendums:***

"The Localism Bill will give local people the power to initiate local referendums on local issues that are important to them. Local authorities and other public bodies will be required to take the outcome of referendums into account and consider what steps, if any, they will take to give effect to the result."

Abolition of Regional Strategies:
"The Secretary of State has already written to local authorities to tell them that the Government intends to abolish regional strategies. The Localism Bill will fulfil this intention, and get rid of the law that requires regional strategies.

Requirement to consult communities before submitting very large planning applications:
"To further strengthen the role of local communities in planning, the Bill will introduce a new requirement for developers to consult local communities before submitting planning applications for very large developments. This will give local people a chance to comment when there is still genuine scope to make changes to proposals."

5. **15 November 2011:** The **Localism Bill** was given Royal Assent, becoming an Act. Communities & Local Government confirm that:

"This Bill will shift power from central government back into the hands of individuals, communities and councils".

"Localism isn't simply about giving power back to local government. This Government trusts people to take charge of their lives and we will push power downwards and outwards to the lowest possible level, including individuals, neighbourhoods, professionals and communities as well as local councils and other local institutions".

6. **January 2012:** The **Prime Minister** announced: *"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 estates 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'."*

7. **27th March 2012:** The **National Planning Policy Framework (NPPF)** was published. This followed extensive consultation during 2011 and replaces government planning policy and mineral policy guidance for England.

"It provides 'a framework within which local people and their accountable council can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.' Accordingly, ***local planning authorities and communities will continue to determine the quantum and location of development, albeit without the additional tier of regional direction.***

The NPPF requires all authorities to objectively assess their own housing markets and make provision accordingly."

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8. **19th July 2012:** The **Draft Arun Local Plan 2012** was released for public consultation, with the deadline for feedback set for 10th September 2012.

9. The current Arun District Local Plan was adopted in 2003. The policies were then saved by the Secretary of State's direction in September 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 the adopted Development Plan document. We believe that the relevant saved policies remain compliant with the guidance and intentions of the new NPPF, and therefore they should be afforded **full weight**.

10. **25th July 2012:** The following statement - **Abolition of Regional Strategies** was made by Baroness Hanham CBE, in which she says:

> *"The proposed revocation of the Regional Strategies before the Core Strategy will be adopted may be regarded as a material consideration by decision makers when determining planning applications and appeals."*
>
> *"In respect of plan-making, the National Planning Policy Framework implementation period provides councils with the incentive to get their plan policies up to date and* ***in doing so they can have regard to the policy to revoke Regional Strategies and the new National Planning Policy Framework policies.*** *A local plan document must be in general conformity with the regional strategy at the stage that the plan is submitted for examination but* ***it is open to councils when preparing local plans to take account of the policy to revoke up to the time of submission. Local authorities can also bring forward proposals (for example on housing targets) which have a local interpretation to them in their plans, based on their own sound evidence base where that is justified by the local circumstances. That evidence base is likely to be more up to date than that included in the Regional Strategies.*** *Each case will depend on its particular facts".*

11. In addition, an important consideration is that in **April 2011** the South Downs National Park came into existence. This introduced additional landscape sensitivity considerations into planning applications, as a substantial area of Angmering is contained within, abuts, or has an impact on views into or from the National Park.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

PRINCIPLES OF DEVELOPMENT

1. The **South East Regional Spatial Strategy** was published as the **South East Plan (SEP)** in 2009. The Government document "Key Aspects of the Plan to Revoke the Regional Strategies" provides an overview of the current position of the SEP:

> *"The Government announced in the Coalition Agreement [May 2010] its intention to **"rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils".** The objective was to make Local Plans, and where desired neighbourhood plans, the basis for local planning decisions."*

2. The document also concedes that the reason for seeking to revoke the SEP is that:

> ***"Regional strategies** set targets such as housing numbers for local authorities. In some areas this proved highly controversial, generated thousands of objections and is not consistent with the principles of localism. This Government believes that democratically elected local authorities working with their local people are better placed to assess and plan for the needs of their community, and make planning decisions, rather than unelected regional bodies. The Government therefore proposes revoking the **South East Regional Strategy**."*

3. Angmering Parish Council has conducted a Housing Needs Survey, the results of which will more clearly define the actual local need for future housing within Angmering. The results of this are awaited at the time of writing.

4. In assessing this application; consideration was given to the policies contained in the Local Plan 2003 and the emerging Draft Local Plan 2013-2028. Reference was also made to the National Planning Policy Framework (NPPF) adopted by the Government earlier this year, which contains the presumption in favour of sustainable housing development (**NPPF Para 14**).

5. **NPPF Para 119** further qualifies this: *"The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined."*

6. In the speech made by Greg Clark (Planning Minister) on Tue 27th March 2012, he emphasised that the "final [NPPF] framework" has been strengthened, in that it now:

   - *"Makes it clear that the local plan is, as the Committee put it, the keystone of the planning edifice*
   - *Goes further than ever before and is clear that councils should look for net improvements on all dimensions of sustainability;*
   - *Makes explicit that the presumption in favour of sustainable development works through, not against, local plans;*
   - *Makes it clear that relevant policies - such as those protecting the Green Belt, Sites of Special Scientific Interest, National Parks and other areas - cannot be overridden by the presumption;*
   - *Recognises the intrinsic value and beauty of the countryside (whether specifically designated or not);*
   - *Makes explicit what was always implicit: that councils' policies must encourage brownfield sites to be brought back into use;"*

7. In his summing up, the Minister concluded that:

> *"It (the NPPF) does so by taking power away from remote bodies and putting it firmly into the hands of the people of England"*

8. There are a number of references in the application to the various policy documents referred to above, with the developer choosing to identify the parts of each that 'support' the arguments being put forward in support of this planning application.

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CONSULTATION PROCESS

1. There is little mention in the document of the Localism Act 2011 or Neighbourhood Plans, and then they are both disregarded. **Page 10 – Statement of Community Involvement** confirms that:

> *". a first public presentation and exhibition was held in the local community at Angmering on the 24th January and the 4th February 2012 respectively. A scheme of 300 dwellings was tabled at that time and on the 4th February an exhibition was held from 1000hrs until 1700hrs"*
>
> *"Following further work in respect of the above, results of all this additional information led to revised proposals that were the subject of another Members Briefing on 12th March, well attended by the public, and a further public consultation exercise, held on 24h March 2012."*

Public Drop-in Sessions

2. At the Public Consultation event held on 4th February 2012 the first display board *"1.0 Introduction to the Site and Planning: Planning Policy Background"*, clearly states the premise and principals upon which the proposed application was based:

> *"The Development Plan consists the South East Plan, the Arun District Local Plan and other policy documents prepared by the District Council along with other government policy and guidance available at the time"*
>
> *"The site under consideration is located outside the settlement boundary of Angmering but given the outdated nature of the Local Plan, the settlement boundary has significantly reduced weight because the Local Plan is time expired."*
>
> *"Arun District Council continues to update planning policies and to date, the only options to provide additional housing to meet the five year land supply are located outside current settlement boundaries;"*
>
> *"In two recent appeals determined by the Secretary of State in Arun, dated the 1st and the 19th December 2011, both inspectors confirmed that the Council does not have an up-to-date five year land supply to meet requirements."*
>
> *"The site east of Angmering has been identified for potential development by the planning authority in previous options, there being a good range of services and facilities and for this reason any development of this site would be sustainable;"*
>
> *"There are other planning policies relevant to this site including for example, ecology, noise, drainage and transport all of which have been surveyed which confirm there are no issues present to prevent future development. This evidence base will be presented to the Council on submission of the planning application."*

3. Whilst the Parish Council appreciates that at the time the presentation was put together, guidelines on the emerging changes to planning policies were unclear, it appears that regardless of subsequent government statements on Policy and guidelines, and the release of the

emerging Local Plan and its supporting background documentation, the original premise remains the same.

4. The **only** change in the proposed development made as a result of "consultation" has been that expert Statements and evidence submitted to ADC in support of the planning application have been updated to reflect the reduction in size of the proposed development, both in footprint and housing numbers.

5. The developer makes its Statement of Community Involvement (Page 10), which appears to have been just a box-ticking exercise:

   - There is no summary of the feedback generated by the Consultation process, or reference to the concerns, questions or suggestions made by parishioners, and what influence they had on the shape of the proposed development.

   - Apart from reducing the number of houses from the original 301/ 290 houses (which defines it as a "large development" on the much larger Site 80 in the SHLAA), to 150 houses, which by definition categorises it as a "small development"

   - The vast majority of comments received from members of the public were against the development, and yet there is no analysis of what has been done to answer concerns. Just reducing the size of the development is not sufficient. The document also does not contain the answers to the questions raised by parishioners.

Meetings with the Parish Council

6. The developers attended a meeting with the Parish Council on 12th March 2012 to discuss the proposed planning application, which at the time was for 301 new homes, and the minutes of this meeting can be found at Appendix O.

7. The developer has not consulted further with the Parish Council on the matters that were raised at that meeting, changing the final application to 150 homes and taking a 'like it or leave' attitude.

8. The developers also met with the Parish Neighbourhood Plan team on 24th January 2012, explaining that they were proposing to build 301 homes on the site in question. The minutes of this meeting are shown at Appendix N.

9. The developers had not properly acknowledged the requests resulting from their meetings with the Angmering Neighbourhood Plan team or the Parish Council,

   "Neighbourhood planning measures allow communities to shape new development by coming together to prepare neighbourhood plans. They will be able to:

   - *choose where they want new homes, shops and offices to be built*
   - *have their say on what those new buildings should look like*
   - *grant planning permission for the new buildings they want to see go ahead*

   Parish and town councils or neighbourhood forums will lead the creation of neighbourhood plans, supported by the local planning authority. Once written the plan will be independently examined and put to a referendum of local people for approval"

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10. It would have been appropriate, under the heading of Community Involvement, for the developers to demonstrate that this had been done. There is no attempt to hide the fact that the application was submitted at this time to deliberately avoid both the adoption of the Local Plan and the Neighbourhood Plan. This could be interpreted as being **Premature**.

11. One principle being used in this submission is that if a policy is consistent between one Plan and the other, then it should continue to be **material** and be taken into account.

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DEFINITION OF URBAN AND RURAL FOR POLICY PURPOSES

1. There is constant mention within the application to the guidelines for **Urban Extension** which is inappropriate for Angmering since it is a village and is therefore to be considered as **Rural.** (The Oxford English Dictionary definition of Rural being that it relates to a village or countryside, rather than Urban which relates to towns and cities).

2. The Department for Communities and Local Government document **"Urban and rural area definitions: a user guide"**, was commissioned to provide a clear definition of urban and rural areas for planning policy purposes and statistical reporting. Section 1: Summary of definitions - Para 1 states that:

   ". . . all settlements of over 10,000 are treated as urban areas. All smaller settlements, together with all other land, are treated as rural areas."

3. It is the **rural** nature of the Angmering that motivates the requirement to keep it a village, and the belief is that this development is one step too many which will change the nature of the village, not complying with Policy GEN2, explanation 1.08.

   - It has been stated by the applicants at public Consultation meetings that the intention is to make the application before the new Plans can be deemed to be material, particularly since the revocation of the South East Plan (SEP) would mean that the demonstration of evidence for actual local housing need would be untenable.

   - The Baroness Hanham statement makes it clear that the revocation of the SEP may be seen as material in planning considerations.

   - Allowing this development which appears to be based on the identification of this site's potential for future development in the SHLAA, and which does not comply with national government or local statements of planning policy would set a precedent for the uncontrolled development of the east side of Angmering. The local view of which is that none of this should be developed on a mass basis. The Community, by means of the Neighbourhood Plan, believes that the current land use between Roundstone Lane and the by-pass should remain as it is for the time being.

   - Angmering has already absorbed a development of 650 units in the last 10 years which increased the population by 35% and is agreed by the Parish Council to be the limit in terms of future large one-off developments, and of what can reasonably be deemed as sustainable in terms of current infrastructure and services. Reference should be made to Arun District Council's report 'Bramley Green Residents' Survey 2004, a summary of which is shown at Appendix M. Roundstone Lane is the boundary limit for development and for keeping the nature of the village and social cohesion and inclusion of its community intact.

4. In the Parish Council's view, because of the lack of local employment opportunities, poor public transport links, distance from the village centre services, primary schools and shops, this development is **not sustainable** and would result in a community for which the car would be the transport option of choice. As a result, the development would appear attached to, but would not be part of the existing settlement.

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COMMENTS ON THE APPLICATION

1. The NPPF requires development to be **sustainable** and the application repeats that this is the case. Sustainability has three elements to it requiring attention to be paid to the economic, environmental and social effects. There are many questions about whether the application satisfactorily demonstrates the sustainability of the development.

2. The application is for **Full Planning Permission**, which requires **all** supporting Statements and details to be included and current. However, there are a number of areas where it is stated that further work needs to be done.

3. There are also a number of inconsistencies in the application and errors of fact that materially affect it. Once again, a full application should be complete and stand on its own.

4. Local opinion is firmly against the development, the Parish office having received 510 copy letters to Arun District Council, all of which have objected to the proposal. All of these letters have been read by the Working Group and an analysis of the broad areas of objection is as follows:-

Compliance with the Development Plan & the NPPF	212
Highway Safety	454
Parking	217
Need for new housing	162
Flooding	221
Water Supply	167
Village Life	145
Jobs	121

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PLANNING STATEMENT including STATEMENT OF COMMUNITY INVOLVEMENT

Planning Statement

1. The following are comments on statements made that are either internally inconsistent or do not comply with stated policies.

2. **Page2 – Introduction** Statements are made about the pre-application advice received in November 2011, in particular:

> *'It was determined that an EIA is not required for the proposed development as any impacts on the environment were not sufficient as to be covered by the Regulations due to the size, location and absence of environmental constraints or designations'.*

3. There is some concern about what was allegedly quoted in relation to having no requirement for an Environmental Impact Assessment (EIA).

4. The decision that appears to have been made by the Planning Authority that this application does not require an EIA is surprising given the Greenfield nature of the site; it's proximity to and visibility from the SDNP; the Ecology Assessment findings in terms of "important habitat" and EU and BAP priority species and species of conservation concern; the Archaeological Assessment conclusion as to the importance of the site; etc.

5. In the main EIAs apply to large-scale developments where there is obvious potential for environment damage. The size of a development is not, however, the only criterion. The key issue to be considered is whether a development is likely to have a significant effect on the environment. Small major housing developments (between 10 and 199 houses) in or close to sensitive areas can have effects just as damaging as those from large-scale projects.

6. It is the view of the Parish Council that an EIA is required in support of this application to enable the Parish Council and the community to properly understand the impact of the proposed development and fully understand the proposed mitigation measures.

7. The following statement that the residential development of the site could be supported in principle is odd given the number of policies that it does not comply with.

> *'At the same time, a formal pre-application inquiry was submitted and a response was received by letter dated 7.11.11 ref PAA/85/11. This set out the policy background against which the application would be considered and the documentation that would be required to support an application. It concluded that a proposal for residential development of this site could be supported in principle, given its reasonably sustainable location, the lack of housing supply, and the strategic objectives of the South East Plan. Since that date the NPPF has been adopted."*

8. The ability of this application to support "sustainability", "the lack of housing supply" and the "strategic objectives" of current planning policies and guidelines are discussed later in this document.

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9. Page 3 – Planning Policy Guidance – National Planning Guidance: In this section the applicant acknowledges the changes to the planning policies and subsequent government guidelines that have been given as a result of the introduction of the **Localism Bill** which became an Act of law on 15th November 2011 to abolish regional strategies

> *"This up to date guidance sets out the government's approach to economic, environmental and social planning policies and the achievement of sustainable development:"*

10. On Page 4, it goes on to say that:

> *"The planning application is submitted in accordance with the NPPF in the absence of up-to-date policies to achieve housing provision requirements, and given the length of time before the Core Strategy will be adopted. The proposals will not however undermine local housing objectives, as it apparent from emerging policy that Angmering is considered an appropriate location for strategic development. The site is sustainable as it abuts the settlement boundary and is within walking distance of the local centre and public transport."*

11. The Parish Council has concerns about how these *"up-to-date policies"* have been applied in justifying this application.

12. Especially when assessed against the timeline of changes to "Government & Local Guidelines and Policies" (see Appendix A) that were announced between the pre-application advice provided on 7th November 2011 (prior to the Localism Act which came into being on 15th November 2011); Public Consultation events in January to March of 2012 and the submission of the final full planning application to Arun District Council on 30th July 2012.

13. On Page 5 the applicant states that:

> *'The site is sustainable as it abuts the settlement boundary and is within walking distance of the local centre and public transport'.*

14. First of all, there is more to sustainability than this. Secondly, the Parish Council challenges the statement that it is within walking distance of the local centre. Half of the affordable houses (22) are in the southern segment of the development. They are furthest from the site entrance and as a result furthest from the village centre and local services. Anyone with mobility problems and using a scooter would find this an insurmountable journey.

15. Page 5– Planning Policy Guidance – South East Plan (SEP): There is a quote from the South East Plan, part of Policy SCT1:

> *'Local Authorities should, as a priority, pro-actively pursue and promote the sustainable economic growth and regeneration of the Sussex Coast that will:*
> *iii. Provide sustainable **urban** extensions in Arun, Chichester, Rother and Wealden Districts'*

16. It is obvious that the intention of the Policy SCT1 (iii) is to extend the towns in these Districts and **not villages**

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17. This is **IMPORTANT** because it is this **urban extension** thread that goes right through the application. Angmering village is, for national planning policy purposes and statistical reporting defined as **RURAL** – see Appendix D. As a rural settlement, Policy SCT1 does not apply to Angmering.

18. Para 28. of Planning Policy Statement 7: Sustainable Development in Rural Areas under section "Best and most versatile agricultural land" states that:

> *"The presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications"*

19. It is defending against its **urbanisation** that motivates the strong feelings of residents within the Parish, as well as from surrounding areas.

20. <u>Page 5 - Local Planning Guidance - Arun District Local Plan 2003</u>: The references to policies GEN 2 and GEN 3 in the old Local Plan are deemed by the applicants as having *'....significantly reduced weight'* in relation to *"the lack of a 5-year Land Supply"*.

> *"The Arun District Local Plan allocates this site outside the settlement policy boundary (GEN 2) where development in the countryside is not normally permitted (policy GEN3). This remains a 'saved' policy until the Local Development Framework and Core Strategy is progressed. Unless other material planning considerations apply, such as the lack of a 5 year land supply, planning policies would not currently support an application for residential development. However, these settlement policy boundaries were drawn against the background of the required number of dwellings for the plan period up to 2011 and do not relate to housing provision beyond 2011."*

21. The Arun Draft Local Plan 2012 and its policies referenced by the applicant in the documentation used in support of this application, does have Policy SP2 which indicates the continuation of the same policies with the same boundary in this area of the village.

22. In other words, just because there is a gap in policy documents, this does not mean that consistent policies do not exist, and therefore they should still be considered as **material**. The NPPF says:

> *Para 212: However, the policies contained in this Framework are material considerations which local planning authorities should take into account from the day of its publication. The Framework must also be taken into account in the preparation of plans*
>
> *Para 213: Plans may, therefore, need to be revised to take into account the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.*

> *Para 214: for 12 months from the day of publication, decision-takers may continue to give full weight to relevant policies adopted since 2004 even if there is a limited degree of conflict with this Framework.*
>
> *Para 215: In other cases and following this 12-month period, due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).*

23. It is therefore our view that full weight can be given to these saved policies of the 2003 ADLP. This view is endorsed by the fact that the applicant also makes reference to various policies in both the 2003 ADLP and the emerging Arun Local Plan in support of their application

> *"Policies within the SE Plan, particularly SCT1, promote sustainable urban extensions in Arun, thereby acknowledging that a proportion of new development will take place on greenfield land."*

The intention of the Policy SCT1 is to extend the towns Arun. Angmering village is, for national planning policy purposes and statistical reporting, defined as **RURAL**

24. <u>Page 6: Appeal Decisions Referenced in Support of the Application</u>: The first appeal decision referenced in support of the application states that:

> *". . . there is no up to date development plan even in draft form, against which this proposal can be judged".*

25. In our view this appeal decision is not relevant.

26. A Draft Local Plan does now exist, and in fact is referenced by the applicant in support of this planning application. Likewise, the second and third appeal quotations referenced in support of the application (Page 6) to justify development on land outside the Angmering built-up area, also fail to apply.

27. In support of the application, the Developer has quoted the findings of Appeal decisions for both Goodacres (appeal allowed) and Woodgate Centre (appeal dismissed). It should be noted that the following is paragraph 32 in the latter, which is not quoted by the applicant says:-

> *"Despite these mitigating factors,* [on whether it was of landscape merit or not], *and notwithstanding that the settlement boundaries and countryside protection policies GEN2 and GEN3 of the ADLP are to be regarded as out of date, the proposed development would nevertheless cause a degree of harm to the intrinsic semi-rural character of the appeal site, and to the countryside on its eastern flank. This is a material consideration still recognised by Framework paragraph 17, as well as SEP Policy CC2, and is to be taken into account in the overall balance of planning considerations."*

28. This finding could be applied to the situation that applies to the Angmering site covered by this proposal and was one of the material considerations, along with a lack of sustainability, which resulted in the appeal being turned down.

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29. We feel that it is also important to note that since the submission of these two planning applications - Goodacres-on 24th May 2011; Woodgate Centre on 2nd July 2011 – changes to Government and Local Guidelines and Policies have been further clarified and strengthened. See Appendix A.

30. An additional material decision that the applicant sites in support of their case, which added weight to the second appeal decision, is that:

> *"There are no previously developed areas of land sufficient to provide an alternative to greenfield development"*.

31. This is also not the case. Both the 2009 SHLAA and updated 2012 SHLAA identify a large Brownfield site (Site 101) inside the settlement boundary and a number of other mixed use (non-Greenfield) sites outside of the settlement boundary. The Angmering Neighbourhood Development Plan teams have also identified a number of additional smaller sites inside the settlement boundary.

32. The applicant does not provide any evidence that they have assessed the "strategic" site for which they are applying for planning approval against reasonable alternative sites identified in the SHLAA in or around the settlement of Angmering. Failure to do so, fails to meet the requirements of the directive to consider reasonable alternative sites under EU and national planning policy and sustainability objectives.

33. It is the Parish Council's view that **there is no requirement to build on a Greenfield site,** irrespective of the fact that according to the SHLAA this site is considered as being "in a location that developers find attractive"

34. <u>Page 7 - Strategic Housing Land Availability Assessment</u> (SHLAA). It is important to remember that **the SHLAA is NOT a Policy document.** A point also made by the Appeal Inspector for Woodgate.

35. The SHLAA update in 2012 has 290 as the number of houses possible on the original larger site, but allocates them to the period of 2018-2022 rather than the quoted 2014-2018.

36. The SHLAA points out that the site is located in a groundwater emergence zone and that there was potential for ground water flood risk. It also says that *"In a previous Landscape Study conducted in 2006, this area was judged as having a 'Low/ Medium' Landscape Capacity for development"*.

37. The findings of the 2006 Landscape Study need to be assessed against the fact that in April 2011 the South Downs National Park came into existence, which introduced heightened landscape sensitivity considerations in regard to development of this site. The north east corner of this site abuts the National Park, and the site itself has an impact on views into and from the National Park.

38. Although this point is raised in public objections, the applicant fails to recognise this important fact anywhere in the Planning Statement.

39. The document then goes on to say that the site *"could contribute to the creation of a sustainable, mixed community"*. What is missed here is that **the caveat was on the basis that it**

was part of a bigger development, therefore based on the findings of the SHLAA itself, sustainability of development on this site is questionable.

40. The SHLAA also says *"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)."*

41. Page 8 – Housing land Supply: The applicant states

> *"In the light of national planning guidance, the shortfall of deliverable sites to meet the required 5 year land supply against regional targets is a material planning consideration, and that this supply should provide an additional buffer of 5% to ensure choice and competition and that this buffer should be increased to 20% where that is a record of persistent under-delivery."*

42. The current figures include SEP "strategic" housing numbers. The government statement made by Baroness Hanham, "Abolition of Regional Strategies states that ". . . . ***it is open to councils when preparing local plans to take account of the policy to revoke [SEP] up to the time of submission***".

43. Arun District Council has demonstrated that even taking SEP numbers into account, it has a sufficient 5-year land supply (See Para 49)

44. The applicant continues to justify the development, by stating that:

> *"An application that is sustainably located and has no significant impact on the character of the settlement should not be turned down only on housing supply grounds."*

45. Again, this "evidence" is taken from the SHLAA. Sustainability of the site is discussed later in this document. The NPPF *"Makes explicit that the presumption in favour of sustainable development works through, not against, local plans; "*, (See Appendix B, Para 6). The emerging Local Plan has yet to confirm that this site is to be allocated for housing development.

46. In the following statement, the applicant attempts to support the application by challenging Arun District Council's forecasting ability:

> *"The application site is included in the SHLAA as being appropriate for development for up to 300 houses in the period 2014 -18. However it is clear that in the calculations there is still an assumption that other sites will come forward in the 5 year period to maintain this supply."*

47. It seems that this *"assumption"* by Arun District Council (which was in all likelihood based on local knowledge) proved to be correct. Arun's "Housing Land Supply Assessment – September 2012", confirms that:

> *"the trend in terms of the number of dwelling completions is strongly positive which provides compelling evidence that that number of completions on windfall sites is realistic and, moreover, given available evidence of relative stability in the housing market, that completions on windfall sites is a reliable source of supply."*

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48. The Angmering Parish Council Neighbourhood Plan teams have also identified a number of additional smaller sites inside the settlement boundary which are expected to further increase the current Land Supply numbers.

49. Arun District Council have confirmed that:

> *"there is a supply of land in the Arun district for the five year period ended 31st March 2018 in excess of the calculated housing requirement plus a buffer of 5% and after including an allowance to deal with a shortfall in housing delivery to date;"*
>
> *"that there is a supply of land for years 6-10 in excess of the calculated housing requirement for the Arun district based on the stated South East Plan housing requirement and after including an allowance to deal with a shortfall in housing delivery to date (subject to the allocation of sites for housing development in the emerging Local Plan and delivery rates in line with the windfall allowance and projected dwelling completions on permitted sites and SHLAA sites"*

50. Arun states that its assessment of Land Supply *"reflects both the publication of updated base data for the housing land supply assessment and also a number of changes, in terms of methodology [NPPF], to that set out in the Housing Land Supply Assessment May 2012"*

> *"The NPPF requires all authorities to objectively assess their own housing markets and make provision accordingly"*

51. The applicant states that therefore, based on the evidence and arguments put forward in this "statement", it is their opinion, that:

> *"There is no reason that the application site should not come forward at this point in time and there is no reason to exclude it on land supply grounds."*

52. Based on the evidence provided by Arun District Council's "Housing Land Supply Assessment – September 2012"; government guidelines on the Abolition of Regional Strategies for housing (see Appendix A) and the emerging Local Plan; Angmering Parish Council can see no reason or need as to why this site should be brought forward for development at this point in time.

53. <u>Page 9 – Annual Monitoring Report (2010 – 2011)</u>: The applicant states that:

> *"As a 5-year supply of deliverable housing land is not demonstrated, it follows that the policies of the ADLP 2003 and SEP are not up to date in terms of the NPPF para. 49 and that this degree of shortfall is a material consideration in favour of allowing the proposed development."*

54. In our view, Arun District Council can demonstrate a 5-year Land Supply (Para 49); therefore this is not a "material consideration" that can be used to justify this application.

55. <u>Page 9 – Local Development Framework (LDF)</u>: the statement deals with what it calls the Local Development Framework (LDF) which is in fact the Draft Local Plan. This again focuses on the concept of **urban** extensions and quotes from the SHLAA.

56. It calls the plan something with *'very little weight'* and yet picks out the bits that support the proposed development, whilst ignoring everything else in it (Protection of Grade 1 Agricultural Land for instance under DM8).

Statement of Community Involvement

57. **On page 30**, The Design and Access Statement references, in the section on S106/Affordable Housing, one of the most telling statements:

> *'In the light of recent appeal advice in the Goodacres decision, it is clear that sufficient evidence has to be provided by the Council to ensure that any contribution is required as a consequence of the development, to enable an appropriate agreement to be secured in order to facilitate the development of the site'*

58. This suggests that the applicants will make no attempt to provide more than they <u>have</u> to. There will be no contribution to the current Infrastructure Deficit – if this is followed by all developers then the A259 problems will <u>never</u> be addressed by developer contributions as "the deficit" exists already. For this reason alone the site should be deemed as unsustainable.

59. **On page 31** as part of the conclusion, three quotes show the driving forces behind the application:-

> *(i) "The pre-application advice from ADC 'concluded that residential development of the site could be supported in principle given its reasonably sustainable location, lack of housing land supply and strategic objective within the SE Plan'."*

Is this what was said and, if so, on what authority and against what evidence supporting the planning application was this advice given?

> *(ii) 'The layout has been designed to allow linkage to adjoining sites should they come forward for development at a later date.'*

This statement appears to allude to the fact that the Developer still has options on the rest of the land to the north and west of this site that comprises Site 80 as defined in the SHLAA and will come back later.

The gaps in the site lay-out to the north and western borders map to the layout of the original 301 / 290 plans. Should this application be approved, then the proposed layout and could support the linkage to any later application submitted by the applicant for "bolt on" housing development.

At the Consultation sessions the representatives from the developer confirmed that they were aware of, and were speaking with Persimmon about the proposed development (on the Worthing Rugby Club site) to the south of the site. This appears to be borne out by the positioning of the road which runs parallel to the sites southern border.

(iii) *'In planning policy terms, the application is justified at this point in time due to the need for an on-going and deliverable 5-year land supply as required by the NPPF and the time it will be before a Core Strategy can be adopted. The application will provide much needed housing in a sustainable location and will contribute to the housing land supply targets and affordable housing need.'*

This statement appears to strongly suggest that the developers are attempting to come in now whilst they can. There is no mention (or actual evidence provided) of Local Need or references to national government statements of planning policy or local policies that the application does not comply with.

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MATTERS OF CONCERN IN THE DESIGN AND MATERIALS STATEMENT

The site is generally not well designed, since it has the following problems:-

1. There is only one site entrance for 150 houses. If an incident obstructs this entrance then 150 houses and their occupants are blocked in. This also causes concerns with respect to access by emergency services.

2. The affordable houses are all on the east side of the development, closest to the A280 suffering the worst of the noise and air pollution as a result. See Appendix U.

3. Half of the affordable houses (22) are placed together in the south-east corner of the site, which is the furthest from all services, roads, bus services, doctors etc.

4. Due to their proximity to the large trees that screen the eastern (deciduous) and southern (evergreen) boundaries of the site, these properties in particular will suffer from excessive tree shade and nuisance. See Appendix I.

5. The final site position was changed from a mixed site which incorporated land already built on and Manor Nursery. However, the site now proposed is purely Greenfield and it is inappropriate to use this grade 1 agricultural land when other Brownfield sites are available.

6. The stated aim of the design layout, is to *"reflect local proportions"* so that it *"picks up the historic element of the village and applies similar design principles to the scheme to replicate these areas"*, by introducing *'shared pavement and vehicle areas"* etc. Pictures of the High Street are shown as an example.

7. Despite references to Angmering Village, the exhibition boards and proposed design lay-out mirror the urban feel and lay-out of Bramley Green.

8. Replicating narrow village roads that were not designed for the motor car, removals vans, refuse vehicles etc. creates the same traffic issues. In feedback to the "Bramley Green Residents' Survey 2004" conducted by Arun District Council (ADC), *"In terms of satisfaction with various aspects of the development* ***the aspects with the least satisfaction were (7) traffic density, (8) quality of landscaping, and (9) building density"***. In addition: "Lack of visitor parking . . . received multiple mentions". See Appendix M.

9. The Open-Market housing is more than 50% 4/5 bed houses (similar to Bramley Green's 56%), without any demonstrable local need. This development is weighted towards the most profitable end of the market from the developer's point of view. Reference to the ADC report on the post development problems with Bramley Green (reproduced at Appendix M) indicate that this is of concern, and **will be further exacerbated by the current lack of sustainability within the proposed development**.

10. The report says: *"The basic design form of the scheme is a response to the identified constraints and opportunities"*. The Parish Council, in reviewing the expert Statements (e.g. Drainage, Ecology, and Arboricultural amongst others), have concluded that either their findings are **unsustainable,** or they require more work. **Therefore, the robustness of the site layout in its present form,** based on this input, **is considered UNSUSTAINABLE**.

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LANDSCAPE AND VISUAL IMPACT ASSESSMENT

Limitations of assessment

1. **Para 7.7** explains that: *"The initial photographic study was undertaken in January 2011"*

2. **Para 7.19** notes that the field study and photographic appraisal submitted in support of the application were undertaken in July *'when there was full vegetation cover'*. However, there is no explanation as to why the original photographic study in January 2011 was not also included in this impact assessment. Especially as **Para 7.20**, goes on to acknowledge that: *". . . views are likely to be affected in the winter months when there is no leaf cover"*, and therefore, are relevant.

3. It is the view of the Parish Council that the exclusion of this evidence is disingenuous. **The January 2011 photographic study is material.** Without it, a fully informed assessment of the visual impact of this development on the landscape character **cannot** be made.

4. It is also unfortunate that *"Photo location1: Footbridge across the A280"* shows mostly Manor Nursery, with a tree branch in the foreground partially obscuring the view of the site. A couple of steps to the right and the site would have been in plain view.

5. **Para 7.18** The view-point selection does not include Highdown Hill, (which is within the 2.5km radius zone of visibility). It is a well used amenity and is usually used as a bench-mark for any development. Any planning application to develop this stretch of Angmering needs to provide landscape solutions that ensure that it is well screened from impacting on the approach into and the view from the South Downs National Park, notably from Highdown and the footpath into the Park over the A280. This is also a requirement of policy **SP 8** of the emerging Local Plan. The *"Landscape Visual Impact Assessment"* fails to do this.

6. **Para 7.21** Notes that the appraisal was undertaken *when 'there is no specific development proposal to date'*, which militates for a further assessment to be made in the context of the development plans now available.

7. **Para 8.5** References the West Sussex County Council document *"A Strategy for the West Sussex Landscape"* as the basis for the Landscape Visual sensitivity rating of "Medium/Low' ' is open to challenge on the following points:

    - The applicant for the purpose of this assessment categorises the settlement of Angmering as urban. For planning policy purposes, Angmering is defined as **RURAL** (See Appendix D)

    - The use of **LOCAL CHARACTER AREA – SC11** Littlehampton and Worthing Fringes which talks about *"The urban fringes associated with sprawling coastal resorts. . ."*, to define and measure the impact of this development on the surrounding landscape is **not** appropriate.

    - The location of this **development impacts upon LOCAL CHARACTER AREA – SC12:** Angmering Upper Coastal Plain. *"between Crossbush to the west and Highdown Hill in the east. It forms a transition between the open lower Coastal Plain to the south and the wooded downs to the north"*

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The "*Landscape and Visual Impact Assessment*" needs to take **LOCAL CHARACTER AREA – SC12** into consideration when assessing the visual impact and landscape sensitivity of this development. Therefore, the current assessment of 'Medium/Low' (**Para 10.7**) should be reviewed

8. **Table 12** notes the "Significance of Visual Effect" from a variety of viewpoints during the construction stage as predominantly 'major', with a reassessment of visual impacts after a period of 15 years. This time-scale seems excessive. It is our opinion that even then, the proposal does not state what action could be taken if a level of visual harm remained.

9. The conclusion, **Para 11.2** quotes from the ADC 2009 SHLAA: "*. . . the sites are suitable for development*'. However, in terms of the suitability of this particular site, the SHLAA describes it as: *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**);*"

10. No consideration appears to have been given to seeking the opinion and acceptance by the South Downs National Park Authority in relation to the view into the site from the National Park, which adjoins the boundary of the Parish, and particularly this site.

11. **Para 11.3**, the Parish Council disagrees with the statement that the development introduces "*elements that are not uncharacteristic when set within the attributes of the receiving landscape. Consequently, the significance of landscape effect for the construction of the proposal is assessed to be minor.*" For the reasons outlined above, it is our view that **the landscape effect will be "significant", therefore an Environmental Impact Assessment (EIA) is required.** (See **Appendix F** - Para 2 thru 6 refer)

12. It is the view of the Parish Council that this application should be **REJECTED,** and the applicant requested to re-submit this visual impact assessment to address the review comments above, to include photographic evidence "*in the winter months when there is no leaf cover*" taking into account the general comments made on "viewpoint locations" above.

13. The re-submitted document should include a revised landscape sensitivity rating, taking into account "LOCAL CHARACTER AREA – SC12: Angmering Upper Coastal Plain". (**GEN 27** of the Arun District Plan 2003 and policy **SP8: Angmering** from the emerging Local Plan apply.)

14. The Parish of Angmering straddles the South Downs National Park boundary, and as a result, there is strong feeling within the Parish that some local control is necessary over the type and position of future development within Angmering.

15. Since 2001, the village of Angmering has expanded in size by nearly one-third to the south-east.

16. As a result, the remaining strip of rural-urban fringe to the east of the Parish is of great strategic importance to preserving and enhancing Angmering's unique character as a village community. Providing the landscape interface between the village and the countryside, and acting as an important "buffer" between high density housing, to the east of Roundstone Lane, the by-pass and the South Downs National Park.

APPENDIX I

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TREE REPORT, ABORICULTURAL IMPACT and the LANDSCAPE MANAGEMENT REPORT

Tree Report (Tree Survey and Constraint Advice)

1. Para: 1.3 Confirms that:" *This report is not intended to support a planning application on its own, but provides baseline information on the condition of the trees on site. A planning application should be supported by Stages 1 and 3 of the process discussed in (para) 2.4.".*

2. Para 2.4 Stage 1) *"**Tree Survey** and production of report and **Tree Constraints Plan (TCP)**".* These reports can be found in:

   Appendix 2: Tree Survey Schedule. This shows all but 4 of the trees onsite to be in fair to good condition, and less than 2/3 through their expected lifespan. These trees will therefore continue to increase in height, as well as canopy and root spread.

   Appendix 3: Tree Constraints Plan (updated July 2012). Advice provided to the applicant under the heading ***"How to use this plan"***, says:

   "This constraints plan follows the recommendations of BS5837:2012 and provides sufficient information for designers to interpret the constraints presented by the trees on and around the site."

3. The **Tree Constraints Plan** also provides the following guidance:

   ***"Shading area:** An indication of potential direct obstruction of sunlight, showing the pattern through the main part of the day. The design should avoid unreasonable obstruction of light, by siting buildings so that they only flank walls and/or non-habitable/dual aspect rooms are facing the trees in this area. Gardens should be orientated to avoid being entirely within in this zone. It is essential that you contact ACD to discuss any proposals within this area before finalising a design."*

   ***"Future growth area:** Any layout design should only site small non-habitable buildings (garages, cycle stores, etc) within 2 m of tree canopies, in addition to providing space or the tree's growth, this also allows for the working access space needed for the construction of the buildings. In some instances it may be viable to carry out some pruning but this often raises objections from LPAs and therefore ACD should be consulted on any proposals to prune, or site buildings in this area before finalising any design."*

4. The reason the Tree Constraints Plan is missing "Shading area" information, is that it was not requested by the applicant. **Para 4.9** explains that *"Further and more detailed advice from ACD is available on request including tree shadow modelling using advanced software."*

5. Para 2.4 Stage 3) *"Production of **Arboricultural Implications Assessment (AIA)**"* This report has been supplied by ACD.

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6. **Para 2.6** *"We have not been instructed at this stage to contact the Local Authority and investigate the presence of any statutory protection on trees on, or adjacent to the site."* This is a gap in the report's findings. The site borders a conservation area; therefore it is reasonable to assume that some trees may be protected.

7. **Para 4.6** ACD advises that *". . . In terms of the category 'C' trees found within the internal hedgerows, particularly those in the north south dividing hedgerow, they have landscape value as group features and are a constraint to any development of the site notwithstanding their individual category."*

8. **Para 5.4.** *"Arboricultural Implication Assessments (AIA) should be completed to . . . . demonstrate to the Planning Authority the viability of the layout."*

9. The survey records an off-site boundary group of evergreen trees, 16 meters high with meshing crowns on the southern boundary with the Rugby Club, which have been planted for screening purposes.

10. Despite the fact that the **Tree Constraints Plan** (Appendix 3) was updated by AOC in July 2012 to support the current application for FULL PLANNING CONSENT, the plan still does not contain shading area information.

11. The Wilson Bailey **"Ground Investigation Letter report"** also states:-

> **Page 4 Para 8:** *"Where a tree is to be retained the final mature height should be adopted and due allowance should be made for future growth of trees, with particular reference to the relatively dense additional planting that is proposed as part of the ecological mitigation measures."*

12. As it stands, this report does not provide all the information required to meet its objective under BS5837:2012, which is to ensure the site design and lay-out does not impact upon the current and future health and longevity of retained trees.

13. As this application is for FULL PLANNING CONSENT, the Parish Council considers the provision of all information on **"statutory protection on trees on or adjacent to the site", "Shading area"** and **"Future growth area"** (both above and below the ground) for all trees, not just Group C), as material consideration in assessing and agreeing the robustness of the proposed lay-out of the site.

14. This application should be **REJECTED** as this report is missing information, which the **Arboricultural Implications Assessment** (AIA), requires in order to allow informed decisions to be made in *"Liaison with [the] design team to produce [an] arboriculturaly robust [site] layout"* **(Para 2.4 Stage 2)** ,which can be considered **sustainable** .

15. *BS5837:2012; The Hedgerow Regulations 1997: Countryside Act 1981: NPPF (Para 109: GEN 29 & 30 of the 2003 Local Plan and DM 38 & SP23 of the emerging Local Plan apply.*

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Arboricultural Impact Assessment (AIA)

1. **Para 1.1** *"The proposed layout is in line with recommendations of BS5837 (BSI 2012 British Standards Institute). Adequate protection can be provided to ensure all retained trees are protected throughout development."*

2. **Para 1.2** *"Survey data is extracted from, and reference should be made to, the tree survey that preceded this report. (ACD Ref: BSH17576tr8). This survey pre-dates the revision to BS5837:2012 in April 2012".*

3. **Para 2.2** Again the report references *"recommendations of BS5837:2012"*, and states that it *"demonstrates that the impact, both direct and indirect, of the proposed development within the site, has been assessed and where appropriate, mitigation and tree protection proposed."*

4. **Para 2.5** *"This assessment considers the impact of the development on the constraints posed by the retained trees (both beneath ground: the root protection area (RPA), and above ground: the canopy), and material considerations in relation to planning policy."*

5. **Para 2.8** identifies the need for the Tree Protection Plan and Arboricultural Method Statement to be implemented prior to any commencement on site.

6. The ACD **Tree Report (Tree Survey and Constraint Advice) - Para 5.3** states:

   ". . . tree constraints presented by the canopy and the psychological effects of tree proximity to dwellings ***(such as shading, perceived threat of tree failure, etc.) must also be considered during scheme design. . . . optimising site layout and building room use to avoid the end-user becoming resentful of the trees, and seeking excessive pruning or even tree removal.*** *As this issue is directly related to scheme design,* ***it should be addressed during Stage 2 of the Arboricultural planning process"***

   The Wilson Bailey "**Ground Investigation Letter report**" also recommends that:

   Page 4 Para 8: *"Where a tree is to be retained the final mature height should be adopted and due allowance should be made for future growth of trees, with particular reference to the relatively dense additional planting that is proposed as part of the ecological mitigation measures."*

7. In the Parish Council's view, this report is flawed and should be **REJECTED** as **UNSUSTAINABLE** on the following counts:

   i. The **Tree Survey** report is missing information on shading and future tree growth as input to the AIA.

II. Although BS5837 is referenced, this report objective appears to be focused only on one element, to *"ensure all retained trees are protected throughout development"* **(Para 1.1 above).** Future sustainability of the trees also relies following the advice in **Para 5 above.**

III. In the absence of information on tree "Shading area" in the Tree Constraints Plan the Parish Council challenges the validity of the following statements:

Para 1.4 *"The relationship between the buildings and retained trees is sustainable and does not result in any situations that may result in unreasonable pressure to prune requests from future occupants."*

Para 3.6.1 says: *"The site layout has been assessed in terms of shading and future pressure to prune. . . . the juxtaposition is viable for long-term tree retention and not dissimilar to many other relationships between trees and buildings in the surrounding area. It is considered unlikely that there would be any undue pressure to remove trees, or excessively prune from any future occupants."*

No evidence exists that tree shadow modelling was ever commissioned. (See Tree Report: Para 5.3). Instead, the example used is surprising.

It supports the British Standard BS5837 2012 recommendations for assessing and factoring in the requirements of future tree growth – particularly under the ground - as the destructive effects that growing trees and their expanding root systems can have on pavements and walls over time, are clearly demonstrated in the High Street.

8. This planning application cannot be properly assessed until this report is **updated and re-submitted with the missing Tree Report information** that is required to meet BS5837:2012, so that informed decisions can be made in *"Liaison with [the] design team to produce [an] arboriculturaly robust [site] layout"*, (as per Tree Report - Para 2.4 Stage 2), which can be confirmed as sustainable, and meeting Local and Government guidelines and policies.

Landscape Management and Maintenance Plan

1. **Para 4.2** of the Plan envisages the creation of a management company by DWH to maintain area in perpetuity; however no reference is made to fate of the company in event of merger, dissolution or liquidation of DWH nor how it would be funded in perpetuity in such circumstances. A bond or guarantee for future funding should be considered.

2. **Para 4.6** the party referred to as the 'Contract Administrator' has not been defined.

3. **Para 5.4** clarification is required as to who/how herbicide application(s) in accordance with EU requirements will be monitored and action taken in the event of contravention.

4. In **Para 7.7** a definition is required for the term 'extreme drought' in the context of this location and local climatic conditions. Additionally, and the criteria for establishing responsibility for

measuring temperatures in excess of stated level - by whom and over what period – needs to be established?

5. Report lacks a recommendation for an annual independent health and safety review of play areas at developer's expense, with appointment by the local authority.

6. Report lacks guidance in relation to events of non compliance(s) and enforcement in such circumstances.

7. SDNPA consultation is required on issues of the impact of landscaping and tree removal.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

OPEN SPACES AND PLAY FACILITIES

1. This report clearly shows that the Developers are heavily influenced by Arun District Council (ADC):-
   - *"The ADC Play Officer suggests an informal space be created* ***without*** *great activity attraction, with the possibility of investing in offsite facilities".*
   - *"The ADC Responsible Officer further suggests more informal spaces be created again with the possibility of investing in offsite facilities".*

2. Angmering Parish Council (APC) was not invited to comment on these possibilities at time. This appears to imply the following interpretations:-
   - *"Without great activity"* as being the provision of little, if any, equipment on site.
   - *"Possibility of investing in offsite facilities"* as obtained from S106, NHB or CIL should be spent away from Angmering on other entertainment facilities currently contained in the ADC "Draft Strategy for Culture & Leisure Provision in Arun District 2012."
   - Neither possibility is acceptable for the ongoing health and wellbeing of Angmering's Parishioners.

3. The Developers indicate they intend to provide a LEAP (Age 6 – 12) on open space running through the centre of the development. There is certainly no indication of the provision of recreational/play facilities for the younger child, older child, adults or disabled persons.

4. The positioning of the Public Open Space POS is poorly related to the development as a whole, and the extent of the space is insufficient to serve a development of this scale. In its attempt to retain the "important" hedgerow habitat that runs north to south trough the site, it has been incorporated into the POS. However, this has resulted in a narrow strip of land which also incorporates a "wild flower" meadow.

5. The result is that it is not possible for this piece of land to function both as mitigation against loss of wildlife habitat and as POS.

6. An area of POS must be able to be used for ball games etc. The 'Community Garden' is not fully defined and may also not allow for ball games. The layout of the site needs to be reviewed to provide a larger area of POS that will accommodate a play area and allow for an adequate buffer, limiting nuisance for adjacent properties.

7. Existing and future residents will have little benefit from the POS as proposed by this development, either as mitigation in meeting bio-diversity policies or as open space. As such, the application falls foul of established local and national planning policies on estate layout and open space provision

8. This document gives no clear indication of any **positive benefit** to Angmering to mitigate the effects of the development. It does, however, indicate possible investment being placed in facilities outside of the development which could mean investment in improving Angmering's existing play areas. Any benefit of this sort should be placed directly in Angmering and not used to support a wider Arun District Council agenda.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

9. Throughout the document there has been no reference to any other policy document such as "NPPF," "ADC Draft Local Plan" or "The Localism Act." Neither has there been any positive indication as to what type of equipment will be provided, how many pieces or finance available.

10. There is no indication in this document for the provision of cycle routes through the site to join with proposed national routes.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

FLOOD RISK ASSESSMENT & DEVELOPMENT DRAINAGE STRATEGY

1. The NPPF requires developers to conduct a Sequential Test to determine which flooding zone the proposed land for development will be situated. It also states (NPPF page 23/99) new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

2. NPPF Page 23/100 states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. The proposed site, as described by the Environment Agency is within Zone 1 – Lowest risk category. Therefore, irrespective of other aspects the proposed site is suitable for development from a flooding point of view in accordance with the Environment Agency.

3. What is not shown in this Assessment is positive proof that the site will not cause flooding elsewhere.

4. As there is no evidence to support "Sources" claim of no historical reports of flooding, there is no proof either that flooding has not occurred.

5. In view of the flooding situation on 11th June 2012 in other parts of the Parish/Village, there is no evidence that the developers approached neighbours or visited the site during that period to ascertain the state of the site, especially the Rugby Club which does suffer on occasions with ground saturation. Saturation exacerbated by the build of "The Bramley Green Estate" and the heave caused by the loss of numerous trees on Roundstone Lane.

6. To overcome problems with surface water drainage, the developers intend to install an infiltration SUD system, but it is not clear if they intend to replicate the SUD on Mayflower Park. If they do:

   * Where will the water collecting point be?
   * Will any installed SUD cope with high saturation on this site?

7. To deal with the dispersal of foul water, the developers intend to use a gravity system using a pumping station placed in the southern part of the site, to send foul water back through the development to the main foul sewer located in the High Street. The sewage therefore flows across the site twice, with the pumping station at the southern end. What would be the effect of a power cut on the flow of sewage away from the site?

8. It has not been demonstrated that the proposed development will not increase flood risk to other people, contrary to the requirements contained in published planning guidance. Looking at the Flood Risk Assessment (FRA) and Development Drainage Strategy (DDS), more information is necessary to demonstrate whether the proposal is satisfactory.

9. The recently published Technical Guidance (TG) to the NPPF indicates that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. It then says that Strategic Flood Risk Assessments (SFRAs) refine information on the probability of

flooding, taking other sources of flooding and the impact of climate change into account. These then provide the basis for applying the Sequential Test using the flood zones in table 1. 'Other Sources' are then detailed as meaning all sources of flooding , including rivers and the sea, directly from **rainfall on the ground surface and rising groundwater**, overwhelmed sewers and drainage systems and from reservoirs, canals and lakes and other artificial sources. Table 1 also states that the site is in Zone 1 and that development proposals on sites comprising one hectare or above the vulnerability of flooding from other sources as well as from river or sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of new development on surface water run-off, should be incorporated in a Flood Risk Assessment (FRA).

10. The area of this site is greater than 1 hectare and therefore should be subject to a FRA. Arun's SFRA shows the site to be at 'medium to high' risk of flooding (Map L) and in a 'groundwater emergence zone' (Map G1). From the SFRA the safest places for development would be in zone 1 as well as being in an area of low to medium risk of flooding from the land and a medium groundwater flood risk.

11. This site is clearly not in that category and the application of the Sequential Test using flooding from all sources would have identified safer alternative sites. This development could be located on a site with a lower probability of flooding. The important point is to direct development to sites where there is no chance of ~~in~~ flooding others elsewhere.

12. The onus should be on the developer to provide evidence to demonstrate that the proposal will not cause flooding problems, which has not been done satisfactorily.

13. The fact that the site is in a groundwater emergence zone and the evidence that the infiltration proposals would work, supported by evidence from anything other than a very dry winter means that the case is not proven.

14. For these reasons, the flooding and drainage proposals are **not sustainable**.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

INFRASTRUCTURE

Transport Assessment

1. **Para 1.4** says that adequate access to a range of local services from the site can be achieved without the use of a private car however the data provided in para 7.4.2 indicates that 76% will use this mode of access.

2. **Para 1.8 & 1.9** say that development traffic will not materially impact the workings of the local highway network whilst a blocked A259 will be made worse with such traffic.

3. **Para 1.10** is in complete conflict with current West Sussex County Highways policy. Dualling the A259 is the number 1 WSCC priority.

4. **Para 2.1.3** Paragraph 32 of the NPPF states that
   - *'All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether*
   - *Improvements can be undertaken within the transport network that cost-effectively limit the significant elements of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impact s of development are severe.'*

   The cumulative effects of the development of the Dell, Bramley Green and now this application over the last twenty years would be severe. This cumulative effect has not been addressed.

5. **Para 2.1.5** Paragraph 35 of the NPPF states that *'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:*
   - *Give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
   - *Consider the needs of people with disabilities by all modes of transport.*

   There is no safe route for pedestrians or cyclists from the site as a walk to the village centre requires a number of road crossings on unlit roads.

6. The bus service on nearest to this site is the number 9 service from Holmbush to Littlehampton is just once an hour Mondays to Saturdays. The earliest bus going towards Worthing/Holmbush is 8.15am and the last return one beyond Worthing is around 5.15pm. The bus going in the other direction (towards Littlehampton) starts at 7am and ends at 6pm.

7. The service is not supported by West Sussex County Council which takes away a degree of certainty about its future provision, as bus companies are facing a difficult future. Statement 4.2.8 acknowledges that more buses would not be justified by the development.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

8. As an additional point, the bus services to and from the new ASDA at Ferring have just been released with no provision for Angmering.

9. The needs of people with disabilities seem to have been ignored. The placement of all of the 'Affordable' housing on the eastern side of the development, with nearly 50% in the south eastern segment and thus furthest away from Roundstone Lane, means that anyone occupying such houses with disabilities is furthest from everything. The result is that all such people will be required to use their car, if they have one.

10. This is **not 'high quality public transport'**, as it is almost impossible to use the bus services for work purposes.

11. **Para 2.1.5** NPPF Paragraph 38 states that: '*.....Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.*'

    Walking to St. Margaret's school, the only primary school available to the majority of new residents, with 5/6 year-olds is not feasible with the result that all deliveries of children will be by car further exacerbating the chaos that exists currently at both ends of the day.

12. Local Plan Saved Policies GEN7 and GEN15 contained within the ADC Local Plan 2003 are quoted in relation to the promotion of sustainable development, the safe movement of pedestrians and vehicles and the provision of safe and attractive facilities for cyclists and pedestrians. This application clearly does not satisfy the requirements of these policies since there is no extra provision for cyclists or disability scooter users, and the vehicle movements for this site are going to be very high.

13. **Para 3.2.5** acknowledges that there are limited employment opportunities in Angmering and surroundings, which inevitably means all employed people having to out-commute from the site.

14. **Para 4.1.3** states that there is a 1.8m footway on the east side of Roundstone Lane extending from the Northwest corner of the site to Angmering High Street and also from the southwest corner of the site which extends to the public footpath on the north side of the rugby field. **This is clearly not right, there are no such footpaths.** The suspicion is that the statement relates to the original intentions for 301 homes on the larger site when it is nearly (but not completely) correct.

15. **Section 4.3** deals with access to the station at Angmering. **Para 4.3.8** includes the statement that the station is accessible by bicycle and wheelchair, although it is difficult to imagine how a wheelchair could be taken from Angmering to the station without being taken by car.

16. **Para 4.5.10** accepts that the A259 is a problem. This contradicts the statements that there are no problems with the A259 and that the development will not increase them.

17. **Para 5.1** describes the proposed development, but the **analysis of units to be built differs** from that on the application form.

18. **Para 5.3.2** confirms the fact that there is no footpath on the east side of Roundstone Lane as stated in 4.1.3!

19. **Para 5.6.1** mentions the Safety Audit which was carried out on the larger site and not the proposed development.

20. **Para 5.8.1** talks about diverting the 700 service and then says it would be impossible. This seems to be acknowledging that the bus service actually available is inadequate for the development.

21. **Para 7.4** deals with the prediction of travel from and to the new site and appears to use a set of data that is completely unrepresentative of the situation in Angmering. The TRICS survey data used comes from a number of surveys taken from out-of-town sites, but they are all much bigger towns than the village of Angmering. Once again, the concept of **rural information rather than urban** should have been used.

22. **Para 8.1.4** deals with site traffic, and indicates that the main route to the site would be through the village and only considers using the bypass as the last option, making the comment that this adds 2km to the journey. This demonstrates the mindset of everyone and results in far too many vehicles coming through the village, being added to by the new development.

23. One piece of information not used by the developers is a report produced by Arun District Council in 2004, which was a survey of the Residents of Bramley Green, the results of which question a large number of the assumptions contained in this Infrastructure Section.

24. The contents of this section indicate that the proposal is clearly **UNSUSTAINABLE**.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

BRAMLEY GREEN RESIDENTS' SURVEY 2004 – March 2004

1. Arun District Council undertook this research in order to assess the impact of the Bramley Green housing development in Angmering, and in particular how it has met local housing needs **and its impact on local services.**

2. The survey was carried out in-house by the Council's Policy & Research Officer.

3. **Para 4.1.5.** The average age for Bramley Green residents is 30.5, compared with 44.7 for Arun District and 44.5 for Angmering Ward (from the 2001 Census). Surrounding Wards have even higher average age profiles, leading to a concern that the **local infrastructure may not** be set up to cater for an influx of **younger residents** (potentially 1,700 at Bramley Green on top of the 5,812 residents in the Angmering Ward at the 2001 Census).

4. **Para 4.6.** Less than 30% of Bramley Green residents moved there from within the Arun District.

5. **Para 4.7. Less than 25% of employed main wage earners on Bramley Green work within the Arun District.** In contrast, the Housing Needs Survey shows that more than 52% of Arun residents work within the District. **This suggests that the Bramley Green development is something of a dormitory for workers commuting to other parts of the county or further afield.** This finding may help to explain the relatively high number of vehicles per household found on the Bramley Green development.

6. **Para 4.10.** In terms of satisfaction with various aspects of the development the aspects with the **least satisfaction** were **(7) traffic density, (8) quality of landscaping, and (9) building density.**

7. **Para 4.11.** some of the issues concerning residents at the time of the survey. **Lack of visitor parking, overspill parking by visitors to the adjacent Worthing Rugby Club, a lack of post boxes, and a lack of a local shop, all received multiple mentions.** All of these will be exacerbated by the proposed development.

8. **Para 5.6.4.** The 2001 Census shows the average age for Angmering Ward was 44.5, a full 14 years older than for Bramley Green. Given that the wards adjacent to Bramley Green all have relatively older populations, with average ages of 48.0 for Rustington West; 51.4 for Rustington East; 50.1 for East Preston with Kingston; and 55.8 for Ferring, **there may be concern that the immediately local infrastructure is not set up to cater sufficiently for the needs arising from the rapid influx of potentially 1,700* residents forming relatively young family units. Given that the 2001 Census showed Angmering Ward had just 5,812 residents, this is a large increase in population for the Ward.**

9. **Para 5.7.1.** only 27.9% of respondents lived in the Arun District prior to moving to Bramley Green. This drops to just 21.0% for owner occupiers.

10. **Para 5.7.2.** the level of inward migration is significantly higher for Bramley Green residents than for Arun as a whole, given that **72.1% of Bramley Green residents' previous home was outside the District compared with 50.6% for all Arun residents.**

The full report may be viewed on the following website, under the 'Other Reports' section of:-
http://www.arun.gov.uk/main.cfm?type=SURVEYRESULTS

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

Angmering Parish Council
The Corner House
The Square
Angmering
West Sussex BN16 4EA
[redacted]

Established 1894

MINUTES OF THE MEETING OF ANGMERING PARISH COUNCIL HELD IN THE KING SUITE OF ANGMERING VILLAGE HALL ON MONDAY 12th MARCH 2012 AT 7.30pm

Present: Councillors Paul Bicknell; David Biss; Jenny Bos; Susan Francis; Bob Gillett (Vice-Chairman); Julia Graham; Albert Mariner; Steven Mountain; Tony Shire; Pat Turner(Chairman); & Sylvia Verrinder.

In Attendance: Rob Martin (Clerk); District Councillor Julie Hazlehurst; County Councillor Deborah Urquhart and approximately 60 members of the public. At the start of the meeting Julian Jones of Barratt Homes was in attendance and his colleagues Paul Richmond, Andy French and Mark Lukan would arrive later as they were all stuck in traffic.

Action

11/128 APOLOGIES FOR ABSENCE

Apologies for absence had been received from District Councillor Dudley Wensley who was at an Arun District Council Cabinet meeting.

11/129 DECLARATIONS OF PERSONAL OR PREJUDICIAL INTEREST IN ITEMS ON THE AGENDA

No declarations were made.

11/130 APPROVAL OF THE MINUTES

Councillor Shire wanted minute 11/122(e) revised on the basis of accuracy to read:

'Cllr. Shire reported on progress to date, in particular to ensure that the appointment of an appropriate architect when needed does not compromise access to grant funding. Worthing Football Club had recently built a new pavilion, for which a grant was received, so the group had a 'no obligation' meeting with an architect recommended by Morgan Sindall, the contractor to discuss potential ways forward. The architect agreed that he would do a certain amount of work for nothing in order to be able to put something in front of the Football Foundation representative for an opinion on the viability of the project. A copy of the full report is attached to these minutes.'

On a proposal by Councillor Shire, seconded by Councillor Gillett the minutes of the Parish Council meeting of 23rd January 2012 were

ADOPTED and the Chairman signed them.

11/131 **MATTERS ARISING FROM THE MINUTES NOT OTHERWISE ON THE AGENDA**

The following matters were discussed:-

1) 11/113(1) Parish Council Committee Review – The office organisation was currently being considered the result of which would affect the possibilities for this review.
2) 11/113(2) Travellers and Bunds – The bunds had now been installed, but there remained a question of the access gate.
3) 11/113(4) Quality Parish Scheme – The bid for Quality status had been delivered to SALC.
4) 11/120 Arun DC Chief Executive's visit – It was confirmed that Nigel Lynn had toured the parish, but had not attended the Parish Council office as part of the tour.
5) 11/120 Councillor Workshops – It was confirmed that the workshops referred to were only for District Councillors.
6) 11/122(f) JEAAC Highways and Transport Group, Public Attendance – It had been confirmed that these meetings were not open to the public.

BARRATT HOMES

The Chairman adjourned the meeting to allow the representatives from Barratt Homes to present further details of the proposed site east of Roundstone Lane.

Julian Jones wished to outline an overview of the results of the public presentation undertaken on 4 February 2012. The company had a Statement of Community Involvement and that together with information on the Open Day feedback was on the company website. The open day had been advertised by dropping leaflets through 850 doors in the village, and advertisement in the Littlehampton Gazette, having posters around the village and on their website.

378 people had come through the door on the day between 9.30 and 5.00pm. He quoted the comments made by attendees with most relating to highways and infrastructure matters, although 20% said they wanted no such development at all.

On highways matters they had followed up by conducting a walk-round the village with Parish Councillors and as a result had commissioned a traffic video survey.

Conversations had been conducted with senior staff in both West Sussex and Arun and he outlined what they believed were their responsibilities in relation to Education & Health provision. He also stated that there may be an economic case for the provision of an additional convenience store on the development.

Barratt Homes had commissioned an economic survey of the proposals which indicated that it would produce 250 jobs during the construction phase and 55 permanent jobs for the local area as a result of it. There would be £2m net addition to the local economy and a further £2.2m in additional Council Tax, again for the local area.

He stated that the company believed that Arun did not have the required 5 year land supply their view being that there was less than 4 year supply. He further said that there was a need to build 920 homes per annum in the Arun DC area and that only 460 were built last year

and that of 67 Borough Councils ADC came 63rd in the number of affordable homes built last year.
He said that he was meeting with Nick Herbert in 3 weeks time to discuss the proposal.
Andy French took over as Barratt Homes highways expert and reportd on the highways comments from the presentation, such as there was heavy traffic in Station Road and Water Lane, the traffic calming does not slow traffic down and access to the A259 from the village is difficult. He had carried out traffic video surveys placing cameras in the village centre, Roundstone Lane and in Station Road for a week. He reported that Thursday was the worst day and attempted to show some of the videos to councillors from a laptop screen. The company's main concern would be how much worse would the traffic be with the development and that the highway authority would be responsible for auditing the survey results.
Paul Richmond stated that the proposed site would be shared between Barratt and David Wilson Homes. The company had not been a developer on Bramley Green, which had obviously been subject to a strong brief from Arun District Council and was considered a very high quality site. The proposed site would be even better than Bramley Green in architecture and design with a range of properties from 1-bed flats to 5-bed houses.
Mark Lukan stated that the development was required and that the debate over the 5-year land supply would be overcome and that if planning permission was not granted by Arun District Council it would be won on appeal. There would be a further open day on 24 March 2012 and that they would conduct a drop of 800 leaflets the following day.
Paul Richmond stated that there will be more changes to the proposals yet for example if a convenience store were to be built, the layout would need to be changed. They would be talking to other authorities about education and highways matters and discussing the proposal with Arun District Council planners. No mention was made of further discussions with Angmering Parish Council.

Councillor Biss highlighted the fact that the view of people attending the Neighbourhood Plan drop-ins was that the pinch-points did not work and that they preferred raised tables and a 20mph restriction for the whole village.

Councillor Bicknell wanted expansion on the affordable housing aspect of the proposal and was told that there was a mixture included. He also questioned the statement that there was not a 5-year land supply held within the Arun District Council area. The response was that Barratt Homes believed that this was not the case because a lot of the numbers used by Arun related to one large proposal north of Littlehampton where 'all their eggs were in one basket' and that the developers did not own the land yet and as a result development would be slower than Arun believed. This would form the basis of the challenge that Barratt Homes would make at an appeal.

Councillor Bos pointed out that by their own figures the developers had experienced 20% of attendees at their presentation wanting no such development. It would be a case of how many new houses would

be reasonable, rather than the 301 proposed.

Councillor Mountain questioned the economic benefit data presented and questioned the Council Tax addition. He was told that the figures were based on the full Band D council tax for each new house and responded by pointing out that the vast majority of this money went to West Sussex County Council, none of which might find its way to benefit Angmering. Councillor Mountain requested that the economic report be made available to the Parish Council. He also questioned why, with 3,300 properties in the parish, only 800 homes were being notified directly and asked how these were chosen.

Councillor Graham stated that everyone in the parish was a stakeholder and that things such as the traffic effect of the proposal would affect all residents, it was relevant to ask all households. This was the urbanisation of a semi-rural area and would completely change the village, so it was right to survey the whole village.

Councillor Mountain asked whether the developers were aware of the effect of this scheme on Worthing Rugby Club. The Club was now at a high level and attracted 1,000+ people to every league game, with the car parking being on the land contained within the proposal. This would effectively force the Rugby Club to move the site of their ground at a cost of even more housing in the parish. He asked whether there would be compensation within the development for the provision of funds to provide replacement sports facilities if the rugby club had to move.

The Clerk questioned why the proposal was being pushed forward in advance of the Neighbourhood Development Plan being in place with the response being that there had been enough delay already and that commercial pressures required action before the end of 2012.

Councillor Biss had researched the affordable housing numbers for Angmering with the conclusion that there were only 21 in the highest two categories needing housing in Angmering.

Councillor Bicknell questioned what the expected build period would be, the answer to which was around 4 years. He said that this was too big a development too quickly built for the good of Angmering.

This presentation was closed at 8.45pm when the Barratt Homes representative and most of the public left the meeting.
The meeting was re-opened.

11/132 **CO-OPTION OF NEW COUNCILLOR AND RESIGNATION OF STEPHEN WINN**

No applications had been received from people wishing to become councillors and further attempts would be made to ensure that both positions would be filled at the next Parish Council meeting.

11/133 **COUNTY COUNCILLOR'S REPORT**

County Councillor Urquhart reported that West Sussex had not increased its precept for the coming year, having achieved the required £80m of savings without further cuts in service levels.

On the points coming out of the discussion with Barratt Homes it should be clear that the County had no budget for Highway Improvements without developer contributions and new schools would be the gift of the government, only if the need was proven.

11/134 **CHAIRMAN'S REPORT**

The Chairman reported that the work on the Neighbourhood Development Plan was progressing well, with the next stage being a survey for the whole parish. She wished to thank all those taking part for their efforts and the considerable amount of time being put in.

11/135 **PUBLIC CONSULTATION**

A member of the public highlighted the fact that having more houses would seriously affect the water shortage problems that already existed and questioned whether that would be taken into account.

Councillor Bicknell declared a prejudicial interest in this matter as an employee of Southern Water.

The Clerk reported that this would have to be a feature of the Neighbourhood Development Plan and that any application by developers would be considered by the statutory consultees, which included Southern Water. Pressure would need to be brought to bear at the time such an application was made.

11/136 **DISTRICT COUNCILLOR'S REPORT**

District Councillor Julie Haziehurst reported that the District Council were reviewing future service provision, part of which was considering possible delegation to Parish Councils.

She also said that District Councillor Dudley Wensley would become Deputy Leader of Arun District Council in May 2012.

The Clerk questioned whether the discussions relating to delegation would include representatives of Parish Councils and was told that these were just internal for the time being.

11/137 **ANGMERING LIBRARY**

The Clerk outlined progress to date.

a) The building survey had been carried out by Rackhams Surveyors and this had thrown up a number of issues regarding outstanding maintenance matters. The service level agreements and lease were being worked on and legal advice would be sought before anything was signed and sealed.

b) On a proposal by Councillor Graham, seconded by Councillor Francis it was **RESOLVED** with one abstention (Councillor Biss) that the Clerk undertake the protocol to obtain Borrowing Approval for a loan of up to £300,000, that amount possibly being necessary to cover the cost of acquisition plus the expenses resulting from the purchase. It was made clear that this was not approval to take up the loan, but just to enable that to happen when the final decision to make the purchase was made. **Clerk**

11/138 **FLOWER BED MAINTENANCE**

On a proposal by Councillor Bos, seconded by Councillor Bicknell it was unanimously **RESOLVED** to allow Environment Committee to set aside Standing Orders to allow an extension of the existing Ferring Nurseries contract for a further two years, on receipt of a satisfactory

quotation.

Councillor Mountain questioned how the minute 82/11 of the Environment Committee had been changed from being a three-year contract with a potential two-year extension to being just a two-year extension in Policy & Finance minute 11/59. It was explained that the Environment Committee minutes were draft and had not been agreed yet, and that minute 82/11 was incorrect and would be corrected.

11/139 **REPORT FROM SUSSEX POLICE**

There were no police representatives present. Councillor Graham reported that PCSO Emma Orpin attended the Saturday Surgery session. It was agreed that the weekly reports would be sent out to all councillors by email in future rather than printing them for meetings.

11/140 **REPORTS FROM REPRESENTATIVES TO OTHER ORGANISATIONS**

a) **Joint Downland Area Committee (JDAC)** – The next meeting of JDAC would be on 16 April 2012 at the White Swan in Arundel at which a presentation would be made by Councillor Turner and Chris Lynch on the Angmering Youth Bus.

b) **Joint Eastern Arun Area Committee (JEAAC)** – Councillor Mountain reported on the meeting on 6 March 2012 at which the majority of the discussions had been on the issues in relation to the ASDA site.
The £3,000 of New Homes Bonus earmarked for Angmering Parish Council towards the cost of the library project was formally approved.

c) **Arun Eastern Parishes Group** – the next meeting would be on 15 May 2012.

d) **Angmering Sports and Recreation Association (ASRA)** Councillor Turner reported on the recent meeting of the ASRA Committee at which there were concerns expressed about the report produced by the Working Group. Councillor Mountain expressed concern that there were very few people involved now and this was making the working group's position difficult.

e) **ASRA Joint Working Party** – Councillor Shire had circulated a report (copy attached to these minutes) on the progress of the working group's work to date and expressed a need for the whole project to go back to square one, since there was no record of what had been done and said in the past.
The Clerk was instructed that the invoice raised by Saville Jones should not be paid, on the basis that there is no contract between them and the Parish Council.
On a proposal by Councillor Graham, seconded by Councillor Turner it was **RESOLVED** that the working group commence negotiations with Arun District Council for the transfer of the Palmer Road Recreation Ground to the Parish Council.

f) **JEAAC – Highways and Transport Working Group** – No meeting since the last Parish Council.

g) **Angmering Village Hall Management Committee** – Councillor Francis reported that the next meeting would be the following week.

11/141 MINUTES OF COMMITTEES

a) **Policy & Finance Committee** - the draft minutes of the Policy & Finance Committee meeting of 14th February 2012 were received.

b) **Highways Committee** – there were no minutes to be received.

c) **Environment Committee** – the draft minutes of the Environment Committee meeting held on 25 January 2012 were received, with minute number 62/11 altered to reflect the wording shown in minute 11/139 above.

d) **Leisure Committee** – the draft minutes of the Leisure Committee meeting held on 17 January 2012 were received.

e) **Planning Committee** – The draft minutes of Planning Committee held on 27 January 2012 were received.

11/142 FINANCIAL REPORT FOR 2011/2012 TO DATE

a) The statements of Bank Account balances and Loans Outstanding as at 29 February 2012 were noted.

b) The statement of Income and Expenditure for the period ended 29 February 2012 was noted.

c) The list of Cheques for January and February 2012 were noted.

11/143 URGENT BUSINESS

None

11/144 DATE OF NEXT MEETING

The next meeting of the Parish Council would be on Monday 23rd April 2012, at 7.30pm, in the Angmering Village Hall. **All**

The Annual Parish Meeting and the Parish Council Annual meeting would both be held on the same date 21 May 2012, starting at 7.00pm

The meeting finished at 10.35pm

..... Date.....

Chairman

APPENDIX N

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

COMMUNITY-LED NEIGHBOURHOOD PLAN

MINUTES OF THE MEETING OF THE STEERING GROUP

HELD ON Tuesday January 24th 2012 at the Community Centre

Present: Rob Martin (RM), Jenny Bos (JB); Tracey Daley (TD); Val Jerram (VJ); Paul Kempsell (PK); Roger Miles (RMS); Richard Murphy (RMY); Sylvia Verrinder (SV); Pat Turner (PT); Paul Kempsell (PK); Nick Rodgers (NR); Lauren Daly (LD) – secretary;

Barratts: Graham Beck (GB); Katherine Child (KC); Andy French (AF); Julian Jones (JJ); Paul Richmond (PR)

Apologies: Norman Hadley (NH); Tony Shire (TS); Lisa Palmer (LP); Martin Jarvis (MJ)

ITEM	DETAILS	ACTION
SG45.	**Barratts Presentation About Proposed Roundstone Lane Development** KC began by referring to a meeting she had attended in July with RM and the chairman of the Steering Group *(hereby referred to as SG)*. She stated that they had taken the information on board & had spoken to Arun's planning officers accordingly. GB spoke about the planning side of the development. GB began by giving the meeting an overview of what he felt were the important issues, in advance of Barratt's open day for the public to be held on 4th Feb at the Village Hall. He referred to the SG's previous discussions with Worthing Rugby Club & Persimmon's. He advised the SG that he would give them an overview of where Barratt's & Arun's discussions were currently 'at'. He also identified potential issues which the SG may like to discuss such as traffic, medical provisions and school provisions. He also referred to discussing lessons learnt from Bramley Green *(herby referred to as BG)*. He ended by welcoming the SG's questions & feedback. GB stated that planning policy has been 'thrown up in the air'. He stated that Arun District Council's local plan is out of date & therefore planning in the district of Arun is largely being done by appeal. He stated that the proposed Roundstone lane development had been identified as a potential strategic option in the past & the opportunity to develop it had arisen as Arun haven't as yet identified their full 5 year land bank. GB referred to the concerns that the Parish have about future development in Angmering, as brought to Barratt's attention at the meeting in July. In reply to these concerns, GB referred to a meeting he had with West Sussex County Council Education Authority, at which he had been told that if any development at the site on Roundstone Lane went ahead, there would need to be financial contributions made, which would be fed back into education in Angmering. He referred to a contribution of £700,000 plus land that Barratts had made when BG was handed over. He stated that the land that was set aside is still within ownership of West Sussex County Council. He couldn't comment further about potential usage for this money or land & stated that he had investigated this matter as fully as he could. He welcomed the group to advise him if they had any further information about this matter.	

	GB then stated that he had spoken to NHS, who would also require financial contributions. They had advised him that they'd spend the money as far away as Chichester hospital & on a whole range of health services in the area. TD asked what the need is for Angmering to have an additional set of housing. She stated that when Angmering took on the BG development they had been advised that they would only need to take on 145 additional houses. She then referred to the approx 2,000 new homes granted in Littlehampton & wondered why there was a need in the area for further development. GB answered that as Arun don't have a 5 year land supply, they have a shortfall of housing. He then referred to a requirement under the Regional Spatial Strategy (South East Plan) that Arun have a number of houses to deliver in 20 years. He assured the SG that Barratts have identified a *need* for houses within Arun. RM stated that there was an inconsistency between what Barratts & Arun were telling the community in terms of the numbers of houses required. RMY supported this by mentioning his meeting with Simon Meecham, in which he was advised that Arun have identified their 5 year land supply plus 20%. JB suggested that the SG need to speak to Arun to address the inconsistencies in information about the 5 year land supply. All **agreed**. ACTION- RM suggested he take this matter directly to Arun. GB concurred & advised that the SG speak to Arun for more information, as all he could answer from a planning perspective is that Barratt's have been told there is a shortfall in land supply, resulting in a number of national developers vying to build in the district.	RM
SG46.	RM asked to see the plans from a neighbourhood planning framework. GB presented the plans they had put together for the upcoming public open day & stated these would be available on the website after the public consultation. He presented the proposed style of the development, a character neighbourhood feel, a mix of 1 – 4 bedroom houses. He presented the access points, the footpaths, the proposed green areas.	
SG47.	GB asked AF to present the highway plans. AF acknowledged the ongoing issue with high volumes of traffic through the village. He referred to the traffic calming measures that had been put in place & asked if these were enough. The group answered, no. JB stated that the development would bring a high level of traffic onto Roundstone Lane, which would travel through the village centre. AF stated that the development had been designed to avoid this as the entrances would be opening at The High Street & Roundstone Lane. He further stated that as part of their transport proposal, Barratt's have predicted that the majority of traffic will travel along the A280 & A259. However, he stated that it would be unavoidable that a proportion of the residents would travel through the village. RM stepped in to highlight the problem of the lack of schools in the South of the village, meaning that all school children would have to travel through the village to attend school either in the North or out of the village. He stated therefore that this development would further exacerbate an already evident problem. VJ concurred & referred to the issues residents of BG currently face in the morning travelling out towards to A280. SV concurred & stated that should both proposed developments go ahead, there would be a high proportion of traffic deluging the village. RMS asked if Barratts had considered building a junction onto the A280. AF answered that there were constrictions due to the development bordering the National Park. He discussed a number of options, including a roundabout & a junction but stated that these would result in trees having to be chopped down. RMS asked had Barratts given thought to creating roundabout access to the bypass on the corner of the site, which would then come within	

	the jurisdiction of County Highways. He suggested that this would alleviate the high volumes of traffic travelling through the village centre. JB stated that as things stand it'd be difficult for Angmering to accommodate any more traffic. AF referred to proportions of increase, an analysis planners use to predict how much worse new building will make things. JB stated that the general aesthetics of the village were also important. Here RM referred to a phrase GB had used, 'Urban Design principles', whereas in fact the village is rural. SV raised the concern that this would mean 1000 extra cars. AF answered that this wouldn't be the case. JB & TD answered that it would be naive to think that this won't affect the traffic problem, due to high amounts of short journeys families make in the day. AF stated that their proposed numbers take into account real situations & area based on surveys conducted in other parts of the country. TD stated that the numbers don't reflect the 'real life' situation in Angmering. JJ stated Barratts do use surveys which have been revisited after the developments have been in existence, living 'real life' scenarios to provide accurate information.
SG48.	RMY posed the question: 'what advantages would this development bring to the local community', for instance 'would the development create jobs for local people?' GB stated that an increase in the population would make local businesses thrive & he estimated that it would generate £1.8 million of benefit into the community. RM & RMY asked where this money would be spent. GB stated the principle route would be through disposable income. JJ referred to residents spending in the local shops. RM disagreed & stated that this disposable income wouldn't be spent in the parish. RMY asked if Barratt's would use local builders. JJ commented that it is a policy of Barratt to where possible use local suppliers & builders. He mentioned they had signed up to the Arun Charter, in terms of working with local labour & taking on apprentices, meaning they had committed to 70 apprenticeships over local sites. JJ mentioned the New Homes Bonus of £10,000 per completed house which would total £2.6million, paid by central government to Arun District Council. He stated that the intended use for this money would be for projects in the local area. RMY stated that the working groups were planning to suggest as a policy in the CLP that monetary benefits come to the Parish & not the County council & thus posed the question 'can Angmering expect to receive the money from the new homes bonus?' JJ answered that Barratts have no influence over where the money is spent / allocated, but suggested the CLP could lobby for this. PR stated that as developers they are keen for the money to be spent in the local community, as per its intention. RM pointed out that the problem is the differences in definitions of what 'local community' is i.e. to the SG it is Angmering (within the localism act it's defined as the Parish), to Arun it is Arun District. The SG wanted assurance that the *Parish* will benefit. RMS asked what percentage of Barratts workforce are apprenticeships, to get a feel of what jobs this development could bring to the village youth. JJ answered it's roughly 5% of trades. He stated that the Roundstone lane site could potentially take in 2 waves of apprentices over the life of the development: potentially 6-10 apprentices. JB asked how many apprentices would come from Angmering. JJ stated that they will look to employ local youth, through local job centres, but the youth have to be willing to work. He referred to a

	postcode awareness campaign that they've undertaken when employing people in Southampton. JB posed if this is the only proposed benefit for the community?	
SG49.	RMS asked a question about the highways, referring to the large housing development in North Littlehampton & the new Asda superstore to the West, which will result in huge amounts of traffic using the A259 along the stretch that isn't dualled, which would push more traffic through the centre on the village. In light of this, RMS posed the question: 'do Barratts have any influence in regards to county highways to part fund the dualling of the A259 in the context of 106 money?' He suggested that if this was possible, the CLP would have a strong case to argue the County Council would have no grounds not to dual the road. AF answered, that Barratts have no influence on spending but alluded to Government guidelines which state that money must be spent locally on projects relevant to the community. RMS stated that this is understood, but the steering group would like have an expectation that when Barratts do speak to Arun District Council County Highways, they would impress upon them strongly that when they get the 106 money, the Parish has this issue at the top of the priority list.	
SG50.	GB stated that RMS & RMY had raised very important points & asked SG to keep these issues as paramount when they go into private session. He stated that if Barratts know what the community's aspirations are, they can put this into their statement when putting planning application forward. He reiterated that they have no influence on where funds are spent, but if they know the community's aspirations, they can build them into their planning application so that when the community comes to be consulted formally, they can reinforce what Barratt's have already said. RM agreed that the localism act had been designed to allow the community to do just that. He suggested that it would be in Barratt's best interest to be part of the local plan from the offset. He then mentioned that the referendum was planned for late summer & there is an overriding feeling that Barratt's are trying to get their planning application approved before this happens, to avoid being involved. PR disagreed & referred to previous meetings in which they've committed to work with the community.	
SG51.	JJ steered the meeting back to considering the development plans. GB presented the rest of the plans. There was a discussion about the National Park, as the North of the development borders it.	
SG52.	PT raised the point of the proposed empty green space & stated that there needs to be security to prevent travellers moving onto the area, as they do in BG. She stated that traditional deterrents were not working in BG, so there needed to be a solution to prevent this. She also wondered if the space instead could be filled with something that could benefit the community, such as allotments.	
SG53.	ACTION- KC & GB made a note of this point & will consider it. JJ mentioned they would take this up with the open space officer at Arun.	KC / GB
SG54.	PK stated that it would be helpful for the SG to get a commitment from Barratts that they wouldn't go ahead with the planning application until the CLP had been finished, towards the end of Summer 2012. JJ answered that although Barratts would work with the community & address their concerns and aspirations, they would not delay their planning application & stated that it would be lodged within the next two months. He again referred to the issues with Arun's lack of 5 year land supply. PB stated that 3,500 houses have planning permission which to date haven't been completed in Arun. There was some	

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

	discussion about new houses not selling in the region? GB & KC stated that houses in the region were selling. ACTION- JJ suggested that another meeting is arranged for 2 weeks after the Barratts public consultation. All agreed. RM reiterated that the CLP is using the Localism Act to work out a way to find local benefit in development & reminded Barratts that they were not trying to stop all development. He stated that the bottom point, as advised by Arun, is 100 homes & the CLP is in existence to work out how the community could deal with this. TD stated that the local community was confused about the need for more housing. JJ committed to keep listening to the community's concerns. AF elaborated that the best way for the community to get the most benefit from the development is for them to keep dialogue open & to make Barratts understand what they can do to make things better for the Parish.	RM
SG55.	RM introduced the issue of affordable housing & referred to the set ratio of 30% new housing allocated to affordable homes. He stated that the CLP housing needs survey would identify the needs of the people of Angmering. He also stated that the Parish Council were keen to avoid people in need of social housing from outside the district being moved to Angmering. GB stated that it's the housing department of the local authority that dictates to the housing association where people come from. He stated that although Barratts have no control over who is moved into social housing, if they are aware of what Angmering's needs are, they can speak to Andy Elder, officer at Arun housing department. RM interjected that if the CLP has a policy included in the plan, then Arun would be required to work with this, therefore why couldn't Barratts wait until the plan is complete to submit their planning application? JJ stated that even though the plan wouldn't be in place, Barratts would commit to working with the community on the key issues, with an informal agreement on affordable housing, highways, education etc. JJ committed to addressing the community's key issues in their plan, where they can. JB stated that this was helpful, but will be too late as the issues won't have been put to the wider public in the referendum by the time the plan is lodged. RMY made 2 observations: he stated that if the CLP isn't seen to be consulted then appeals will be likely to be turned down, thus the developers & the community should work in cooperation from the offset to avoid potential delays. He stated that the residents of Angmering hadn't yet been told about the open day to be held on 4th Feb & asked if they could make the information available through the Parish Office. ACTION- KC agreed & committed to providing all the information to RM. JJ & KC stated there would be an ad placed in the Littlehampton Gazette.	KC
SG56.	SV posed the question that if the majority of parishioners were against further houses being built, would Barratts consider not building? GB answered that if the objections were based on sound planning reasons then they would be considered but if the opposition wasn't built on sound ground, they wouldn't stop building. He reiterated that once the information gathered at the public open day had been analysed, it would be helpful for another meeting to be held.	
SG57.	ACTION- KC stated that on the open days there would be a preliminary presentation for the SG members, from 9.30-10.00. She stated that Barratts would provide packs for those that	GROUP

	can't attend & asked the members to let RM know if they couldn't attend.	
SG58.	<u>Apologies</u> Tony Shire, Lisa Palmer, Norman Hadley & Martin Jarvis were recorded as having apologised.	
SG59.	<u>Election of new Chair of the Steering Group</u> Firstly it was noted that Tony Shire (TS) had been elected as the councillor on the SG in place of Phil Leverick (PL). VJ then led thanks to PL for all the work he had put in to this point. RM concurred & stated the plan wouldn't be where it was now without PL. All **agreed.** VJ then moved to the matter of electing a new chair of the steering group, stating that it would be very important for the chair & the vice chair to work together moving forward. She also stated how important it would be to have a member of the Parish Council as Chair. SV nominated PT, JB seconded this motion. **All agreed & PT was elected as Chair.** PT stated that the group wouldn't be able to work through all the agenda items in the meeting & proposed another meeting. In light of this, she asked the group what urgent matters needed addressing. RMS stated the minutes from the last meeting needed approving. RMY stated that guidance to the working groups was needed as a matter of priority.	
SG60.	<u>Approval of Minutes of Meeting of 15th December 2012 and Matters Arising</u> RMY stated that the following point had been omitted: at the last meeting he had suggested the SG seek election to the council of Governors of the new Foundation Trust at Worthing Hospital. He had suggested that this should be addressed as a priority as it was one area that the group could make an impact on the delivery of health services. TD pointed out that the last point in Minute SG37 needed amending to: 'One request from the S&FS group was to consider the traffic calming scheme ***proposed*** in Slindon and to see if there was anything to be learnt from this for Angmering'.	LD
SG61.	<u>Future Development Proposal Principles</u> Agenda Item 5 - NR expressed concern about the document as it stands, as there were mistakes & policies that haven't been formulated, i.e. the document refers to a potential lack of school capacity in Angmering, which is factually incorrect & mentions insufficient, potentially dangerous roads which NR felt is hugely subjective. He stated that the document could not be published in its current format. RM concurred & stated he was uneasy with the principle of the document as the SG hadn't yet formulated policies, so some points may not be relevant or correct. NR suggested the document be abandoned for the time being. All **agreed.**	
SG62.	<u>AOB</u> TD raised concern about the guidance to the working groups received to date. She raised the question of what immediate actions were required of each working group. PT suggested considering the guidance note, to collaborate succinct management moving forward. She suggested the SG begin collaborating in all the information from the working groups & start working on the questions for the public. RM concurred & stated that the working groups had reached the stage where each group had done the groundwork & could now create a document using bullet points to list the	

	issues most important to each group. He stated that the public consultations needed to begin & suggested holding workshops in order to inform the groups about public concerns before formulating questions. RMS concurred & stated the importance of establishing the principles from the community before the working groups start writing policies. RMY concurred & suggested holding the questionnaire & the drop in sessions together. He referred to the fact that the housing group was thinking about formulating policies about future housing before knowing if the community wants any more houses built. I.e. the working groups need input to develop the CLP meaningfully. PK suggested that more than one drop in session was needed to be held in order to make more people aware. Roger suggested creating a handbill / leaflet informing people about the drop-ins that could be delivered to every house in Angmering by members of the working groups. All agreed. TD stated that further, they needed to get in touch with other parish organisations, to make them aware of the work the CLP are doing. SV asked how close each group were to getting the questions out to the public. JB suggested holding the workshop & then following up with the questionnaire. RMY suggested that there needed to be more publicity about the CLP, such as information in the Parish Council window, a questionnaire & a Facebook page. TD stated that the community was going up against a corporate body & needed to get professional in organising themselves. She suggested blogging or writing to the Telegraph with a lead story about community land being sold by a few wealthy landowners. PK agreed that someone needed to be designated to manage publicity. RMY agreed & suggested engaging the press, by talking to other local communities embarking on a CLP & getting a story picked up about local Sussex CLPs not receiving adequate support for their endeavours. ACTION- RMY & PK volunteered to run the publicity campaign. ACTION- LD to create & run the CLP Facebook page. LD to meet RM to discuss further. Once LD has gathered the information, the chair of each group would be consulted before the page is made public.	RMY/PK LD
SG63.	<u>Date For Public Drop-Ins</u> It was agreed that the venue should be the Village Hall. RM made the booking. It was agreed that two drop-in sessions should be held, one on a weekday evening & one on a weekend day. Agreed dates: • Saturday 11th February: 10am-2pm • Monday 13th February: 6pm-8.30pm ACTION- PT stated that information about the drop-ins would be published on the Parish Council website. ACTION- RM stated that he would produce a handbill / leaflet to advertise the drop-ins.	Parish Council RM
SG64.	<u>Next Meeting</u> • Monday 20th February: 7pm – 9.30pm at the Community Centre	

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

NOISE IMPACT ASSESSMENT

1. **Para 2.3** defines the scope of the assessment. *"It is considered that it is noise from road traffic using the A280 and from the use of the pitches at Worthing Rugby Club which will require assessment."*

2. **Para 4.3**: *"Unattended measurements were obtained over the period between 7th and 9th December 2010 at the site boundary with the A280."*

3. **Para 4.4**: *"Additional attended measurements were undertaken on the morning of the 9th December in order to gain an understanding of the frequency content and level variation in the vicinity of the proposed development. Subjective observations were also made during this time."*

4. **Para 5.5**: *"At the time of one of 24 Acoustics' site visit, training was in progress at the rugby ground. Noise was observed to be relatively unobtrusive at the nearest site boundary to the grounds, however. Barratt should be aware, however, of the potential for significant local road traffic movements on match days and the potential for a greater noise level during matches from the players and spectators. It is recommended that provision is made for an acoustic barrier (2 m in height) along the southern boundary of the site with the grounds. It is also recommended that the issue of noise from the club is addressed with the local planning authority as part of any pre-application enquiries".*

5. The results in **Table 4** of the report show that the average noise levels were at the high end of NEC group B, defined as *'Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to secure an adequate level of protection against noise'.* The group C levels, just above the site measurements, starts with *'Planning permission should not normally be granted. . . . .'*

6. The Parish Council have the following concerns with the high "average" noise levels recorded and findings in this report which do not take into account the following considerations:

   - The position chosen for noise measurements was at single point where the site boundary is furthest from the road. The affordable housing located at the extreme corners of the eastern boundary will be less than half this distance from the A280.

   - The A280 is expected to see an increase in heavy good vehicles and other traffic because of the new ASDA, (due to open before Christmas this year) and the Sainsbury expansion. Without the latest estimates on traffic volumes from WSCC, the2010 measurements will be an underestimate. Improvements to the A280 are proposed in the emerging Local Plan that will take through traffic onto the A280 and away from Angmering village centre. This needs to be factored in.

- Noise from the Rugby Club on match days and from "evening and weekend social events" although raised as a concern, with a recommendation that **Para 6.4** *"the issue of noise from the club is addressed with the local planning authority as part of any pre-application enquiries"*, this is not factored in.

7. **Para 3.9** quotes the World Health Organisation (WHO) 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* [daytime] *hours of 07:00 and 23:00)."*
   Table 4 shows a **daytime average of 61.5 dB** – this is **6.5 dB over the WHO recommended maximum of 55 dB.** Whilst we recognise that the WHO guidelines can not accepted as Policy, none the less, the report regards it as attracting significant weight by referencing it.

8. The maximum night-time noise level was quoted, however, no figure was provided for the day-time maximum reading that could be compared to the WHO figure of 55 dB. Causing suspicion that the reading was significantly higher.

9. As the noise levels reported in this assessment are significant, the Parish Council believes that the concerns raised above are material, and require the applicant to re-submit this report addressing the issues raised.

ANGMERING PARISH COUNCIL – OBJECTION TO PLANNING APPLICATION ON LAND TO THE EAST OF ROUNDSTONE LANE

ECOLOGICAL ASSESSMENT

1. **Para 1.2.2** states that **the Ecological Assessment is NOT intended to support an application for "FULL PLANNING CONSENT"**, but that: *"The aim of the Ecological Assessment is to survey and document baseline ecology data on the site, and then evaluate and assess the impacts of the proposals for **Outline Planning Permission** against this baseline"*

2. Based on this premise, **Technical Appendix 4 - *Survey Constraints and Limitations*** describes the approach taken: *"Walkover surveys are carried out during a brief window of time. And therefore, the survey will provide only a snapshot of the range of plants and animals that might be present. However, professional judgement is used to interpret the habitat features recorded, and their likely value for supporting protected and notable species, including species of principal importance."*

This planning application should not be considered until an Ecological Assessment that supports FULL PLANNING CONSENT is submitted.

3. **Para 1.3.2** explains that the *"Environmental Impact Assessment (EIA) is governed by the Environmental Impact Assessment Regulations 'The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended)'. These Regulations implement the European Council Directive 85 / 337 on the assessment of the effects of certain public and private projects on the environment in so far as it applies to town and country planning. . . ."* It goes on to say: *"Scoping has been completed and it not considered as falling within the Regulations."*

4. It is not clear why Arun District Council, as part of the scoping process, did not ask that an EIA be submitted in support of this application. However, even if initially thought not to apply, this assessment confirms **this site hosts a number of protected species and important habitats.**

Therefore, an EIA must be provided by the applicant before this application can be assessed.

5. The requirement for an EIA meets the objective set by **Para 1.3.4** , which explains that: *"The Government sets out its objectives for conserving and enhancing biodiversity in the new National Planning Policy Framework that also makes reference to the existing **ODPM Circular 06/2005.** The Government's objectives for planning and biodiversity are that '...the planning system should seek not just to protect, but where possible to enhance biodiversity – making sure we don't just have isolated pockets of wildlife, but rich and connected green spaces for all kinds of species to thrive.'*

Habitat

6. **Para 4.3.1** confirms: *"The site has been open farmland since at least the 1830's and probably for a lot longer. . . "The field boundaries . . . are more or less as they exist today".* The ordnance survey of 1876 - 1887 shows these hedgerows as mature / well established.

7. **Para 4.4.10**: *"The boundary of the north west and north eastern field is a thick outgrown hedgerow with a couple of mature Ash Fraxinus excelsior and Oak Quercus robur trees as standards, and dominated by Elder and Hawthorn with some Blackthorn Prunus spinosa. This hedge is very thick, with about a 10m-15m width. . . . .* ***This is considered Under the Hedgerows Regulations 1997 'important'*** *given its historical presence, connections to other hedges, low percentage gaps, mature standards and diversity of plant species.".*

8. **Para 4.4.13:** *"The grasslands are considered to be of* ***value within the Zone of Influence.*** *The Hedgerow features on site are generally of* ***value within the Zone of Influence,*** *with* ***the hedge running north-south through the centre of the site, this is considered Under the hedgerows Regulations 1997 a hedge is considered 'important' and is considered to be of local nature conservation value.***"

Protected Species:

9. A number of protected species were recorded on site. In **Para 98** of the **ODPM Circular 06/05: "Biodiversity and Geological Conservation – Statutory Obligations and their impact within the Planning System":** states that: *"The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.* ***Local authorities should consult English Nature before granting planning permission. . . .*** *"*

Breeding Birds:

10. **Para 5.2.1** says *that "A breeding bird survey was undertaken on a number of dates in May-June 201"* on 8 mornings *"in May-June 2011".*

11. **Twelve (12) bird species of Conservation Concern under UK BAP (Bio-diversity Action Plan) were recorded on site.** These are listed *in* **Table 2** on **Page 17**

12. **Para 5.2.3** *"Of these species, the only one confirmed to be breeding on site is* ***Dunnock*** *Prunella modularis.* ***Song Thrush*** *Turdus philomelos is also likely to breed in low numbers.*

13. In addition, **Table 2** also lists **Linnet** and **Mistle Thrush** as **breeding locally.** Probably in Poplars on the southern boundary of the site.

14. **Para 5.2.4.** Confirms ***"The site is considered to be of value within the Zone of Influence for local bird populations"***

Bats:

15. **Para 5.3.7** identifies *"on Ash (ACD Tree Constraints Plan tree no.20, with the highest roost potential)"* and concludes, that *"Most of the trees in the areas are considered to be still relatively young and free from damage and the associated potential access for bat roosts."*

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16. **Para 5.3.8** confirms *". . . four species of bat **Common Pipistrelle**. . . **Soprano Pipistrelle**. . . **Natterer's Myotis** and **Brown Long Eared Bat** . . have been definitively recorded from within 2km of the site. This includes larger maternity roosts of Soprano Pipistrelle."*

17. In addition to these species listed above, two less common species, **Serotine** and **Noctule** bats were also recorded on site. The decline in numbers of these species is believed to be due to loss of feeding habitat such as permanent pasture and woodland edge/hedgerows. Loss of suitable trees for roosting is also a major factor in reduction in numbers of Noctule. *(Source: Bat Conservation Trust)*

18. **Para 5.3.16:** *"The Ash tree classified as a 2a tree **is still considered highly likely to support periodic roosting**".* The applicant plans to remove this tree. Its condition is conducive to bat roosting. *"Noctule bats are primarily tree dwellers and live mainly in rot holes,* they occur rarely in buildings. *(Source: Bat Conservation Trust)* **but not** housing development.

19. **Para 5.3.13** confirms that *"All tree lines, woodland edges and hedgerows were used by bats for moving around the within landscape. This is especially so where the hedges are more mature with large mature trees. During the surveys, commuting and foraging bats were recorded at the site using the range of landscape features. No particularly important non-feeding commuting routes were recorded."*

Invertebrates:

20. **Para 5.8.3:** *"The **stag beetle** is listed on **Appendix III of the Bern Convention**, on **Appendix 2 of the Habitats Directive**, on **Schedule 5 of Wildlife & Countryside Act 1981** (as amended), and as **a Priority Species on the UK Biodiversity Action Plan (1995)**. This species favours deadwood habitats. The habitats on site are considered to be of value within the Zone of influence for invertebrate populations."*

Proposed Mitigation:

21. The high level strategy that has been suggested to mitigate against the loss of important grassland habitat, and its resultant impact on the protected species using the site, is to create what is claimed as being sufficient wildflower areas in communal areas and residential gardens. This seems flawed as;
    - relying maintenance of this type of "important" habitat by residents, seems naïve without covenants being drawn up, monitored and actively enforced against residents
    - communal wildflower meadows are also proposed on POS, which will be used for recreation activities and as children's play areas
    - maintenance requirements for open spaces and play areas which include mowing and weed killing will be at odds with the intention to maintain and enhance bio-diversity of these areas

22. It is our view that the proposed mitigation measures are woefully inadequate. The intention is to provide a log pile for recorded species such as stag beetles, on a narrow strip of land in the centre of the site that is also assigned as a Play Area,; plus a dozen bat boxes to accommodate the 6 species of bat shown as using the site is not sufficient.

23. The report lists the UK and EU legislation that applies.

24. In its consultation feedback on the Draft Local Plan, the Parish Council has recommended that this site be included as part of the Angmering Green Infrastructure (GI) Corridor as opposed to developing it.

25. **ODPM Circular 06/05** in **Para 99** states that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision . . . . Where this is the case,* ***the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted****. . . ."*

26. No information has been provided in the form of an EIA to explain how the applicant plans to maintain, let alone achieve a net gain in bio-diversity in respect of this development.

27. ***NPPF Para 110*** *states that "The presumption in favour of sustainable development (paragraph 14)* ***does not apply*** *where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.*

28. It is the Parish Councils opinion that this site is important in terms of local bio-diversity and the protected species it supports. There is no identified need for housing development on this scale in Angmering. If there were; alternative, more suitable sites are identified in the SHLAA.

29. This planning application should be **REJECTED**

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ARCHAEOLOGICAL

Archaeological Desk-based Assessment

1. **Para 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.

2. **Para 7.2.2** says "The impact from the proposed development will include the excavation of footings for the residential properties, trenching for any buried services and stripping associated with the road construction. There is likely to be a high impact on any preserved archaeological deposits within the footprint of the buildings, along service runs and within the areas of the roads.

3. After examining local evidence of archaeological finds in the area, the assessment concludes that:
    - **Para 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."*
    - **Para 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."*
    - **Para 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."*
    - **Para 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"*

4. **Para 2.2** states: *"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:*

    POLICY AREA 17 (Policy DM 33 in Draft Local Plan) – "Sights of Archaeological Interest", which 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

        I. the applicant must arrange for archaeological assessment of the site to be carried out before the planning application is determined;

II. *where the assessment shows that the physical preservation of remains in situ is not justified, conditions may be attached to any permission granted that development will not take place until provision has been made by the developer for a programme of archaeological investigation and recording. The programme will be carried out prior to the commencement of the development; and*

III. *whenever practicable, opportunities should be taken for the enhancement and interpretation of archaeological remains left in situ."*

5. In accordance with the NPPF Para 128 *"Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."*

6. 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. Based on this assessment, **Arun District Council should request that the site be sampled by field investigation before the reviewing this application.**

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AIR QUALITY ASSESSMENT

1. **Para 1.3** *"This report describes existing local air quality conditions (2011), and the predicted air quality in the future assuming that the proposed development does, or does not proceed. The assessment of traffic-related impacts focuses on 2013, which is the anticipated year of opening."*

2. Projections are based on assumption that site opening in 2013. The ***Planning Statement*** submitted by the applicant (Page 7: Para 8) suggests this is now forecast for somewhere between 2014 and 2018. Therefore **these predictions can not be considered material in supporting this application.**

3. Data used for base year 2011. No local emissions data was used. Data came from automatic monitoring sites within 3.5 km of the development. Data for these sites were provided by Arun District Council.

4. **Para 2.3** states *"One of the twelve (**NPPF**) core planning principles notes that planning should "contribute to...reducing pollution". To prevent unacceptable risks from air pollution, planning decisions should ensure that new development is appropriate for its location"*

5. The predicted impact of traffic volumes from site have been assessed by WSCC's "Consultation Response" as low, and that the findings presented in this report *"do not appear to be consistent with observed traffic conditions on the A259 or at Water Lane/A283 [280]. The queue lengths appear to be lower than actual observed queue lengths during the morning and evening peak hours"*

6. What has the impact of the new Haskins Garden Centre had? What impact will the opening of the new Asda and upgraded Sainsburys have on traffic volume and resultant air pollution? Have these projections been included?

7. For example, the bus services to and from the new ASDA at Ferring have just been released with no provision for Angmering.

8. The site is over 1 mile away from Angmering railway station with an infrequent bus service. Village centre services and Primary schools are not considered by the Parish Council to be within easy walking distance from the site. This will encourage a high dependence on the private car to access shops etc. In addition, out-commuting to employment centres in nearby towns, will lead to increased traffic congestion on village roads, air pollution and deterioration in the quality of life for existing residents.

9. In 2004, *"Arun District Council undertook this research in order to assess the impact of the Bramley Green housing development in Angmering, and in particular how it has met local housing needs **and its impact on local services**".* (See APPENDIX M)

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10. Bramley Green has a similar profile to the proposed development, albeit hat it is closer to facilities in Angmering village. Therefore, in our opinion, the findings of this survey in terms of car usage figures are relevant input to modelling traffic and associated emissions.

11. The Parish Council strongly recommends that in light of feedback from WSCC and the amended opening date of the proposed development, that the application is **REJECTED**, and the applicant is asked to re-submit an up to date Air Quality Assessment based on, revised traffic volume figures, which take into account the "Bramley Green Survey" findings on car ownership per unit and usage, and also the projected impact of traffic as a result of local developments such as Asda, which have been approved since this Air Quality assessment was commissioned.

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ENVIRONMENTAL & ECOLOGICAL

Ground Investigation

1. **Page 1 Para 1:** confirm that Wilson Bailey Partnership carried out a *"desk study research and subsequently attended the above site and **carried out a walkover survey and pre-purchase ground investigation** to provide information to assist with the redevelopment of the site through the construction of a new housing development"*

2. **Page 1 Para 2**: caveats the report findings, stating *"Our comments should be viewed in the context of **the limited scope of the investigation**, the locations of the accessible sampling points and the range of data sources consulted, no liability can be accepted for information in other data sources. Any comments made on the basis of information obtained from the client or other third parties are given in good faith on the assumption that the information is accurate; no independent validation of such information has been made by Wilson Bailey Partnership."*

3. **Page 1 Para 4:** *"the findings of the desk study and ground investigation have been used to formulate a conceptual model for the site and facilitate a preliminary qualitative risk assessment and discussion of the implications of any identified issue of potential concern with regards to ground contamination **in order to determine the requirement for further assessment** or remedial action as part of the redevelopment of this site for residential purposes."*

4. It is our opinion that the above statements indicate that **this report was intended as an initial assessment to identify the requirement for additional more detailed technical information and monitoring,** which it then goes on to recommend. **NOT as a document to be used to support FULL PLANNING CONSENT.**

5. **Page 2 Para 2:** confirms that *"Groundwater level monitoring was "carried out during the winter period between October 2011 and March 2012,"*

6. The test period was conducted during the second driest winter since records began. In April 2012 Southern Water imposed a hosepipe ban. The conclusion in the report that *"groundwater is unlikely to be encountered within shallow excavations for foundations and services"* should therefore be questioned.

7. **Page 4 Para 8** says *"Where a tree is to be retained the final mature height should be adopted and due allowance should be made for future growth of trees, with particular reference to the relatively dense additional planting that is proposed as part of the ecological mitigation measures."*

8. The "ecological mitigation measures" do not reference the age or final height of trees in the design layout or in making allowance for calculating RDA (root disturbance area).

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9. **Page 5** *Surface water Drainage* says that *"Borehole percolation tests were carried out in a number of the small diameter boreholes to provide an indication of soils soakage rates"*

10. It is our view that as this is a groundwater emergence site and these tests were carried out towards the end of the driest period for 100 years, conclusions drawn from these results should be considered as flawed.

11. **Page 7** of the report says that *"It is considered that there is a geotechnical requirement for a further phase of ground investigation . . . to determine excavation stability and delineate the part of the site where spread foundations bearing directly within the granular soils may be economically viable""* should be re-assessed following new groundwater tests.

12. Surface water and groundwater flooding are a real problem for the village. Making approx 50% of this groundwater emergence site impermeable increases the potential for surface water run off from the site. Following occupation, this risk is likely to increase over time as new residents build extensions, sheds, patios etc. further reducing the permeability of the site

13. The NPPF requires that *"The drainage strategy should demonstrate the surface water run-off generated up to and including the 1:100 year critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event."*

14. **Policy DM 41** of the emerging Local Plan requires *"A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall;"*

15. There are no infiltration run-off tests or attendant calculations to support the assumption that soakaways will deal with this. This is especially relevant as **Page 4 Para 3** says that *"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."*

16. The technical information and monitoring seems "light" bearing in mind that this is a known groundwater emergence site and application is for FULL PLANNING CONSENT

17. Throughout this document, Wilson &Bailey Partnership emphasise that the scope of this investigation is "limited".

18. It is the view of the Parish Council that this report appears to be an initial scoping document, which makes recommendations for further investigation work that it considers need to be done. It is not intended to provide the detailed mitigation measures required to meet NPPF planning policy, including GEN 9 and GEN 11 of the 2003 Local Plan and DM 41 & 41 of the emerging Plan, to support FULL PLANNING CONSENT for development on this site.

19. Additional monitoring and other considerations outlined in this "scoping document" must be completed before this application is reviewed for FULL PLANNING CONSENT.

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NOISE MEASUREMENT POSITION (Noise Impact Assessment- Appendix P)

1. The position chosen for noise measurements was at a single point where the site boundary is furthest from the road. See Figure 1 (below) from Noise Impact Assessment Page 11

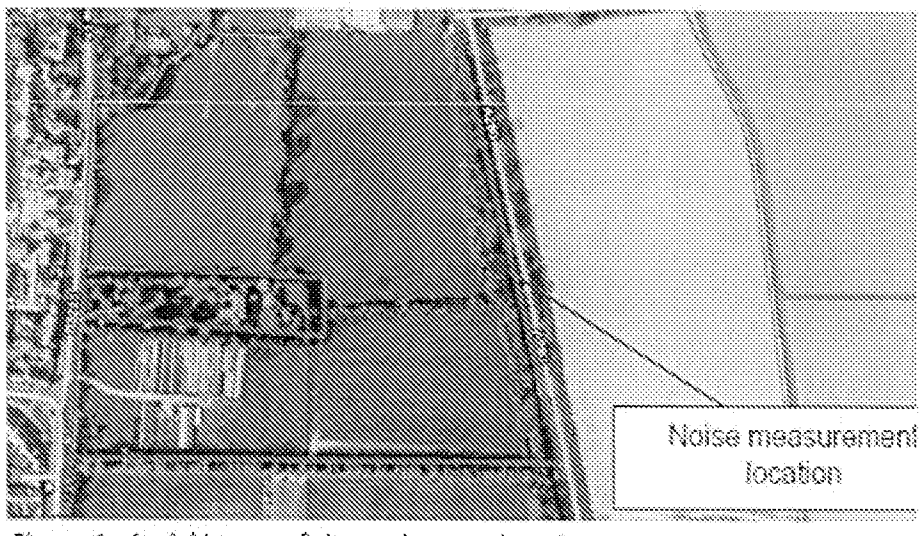
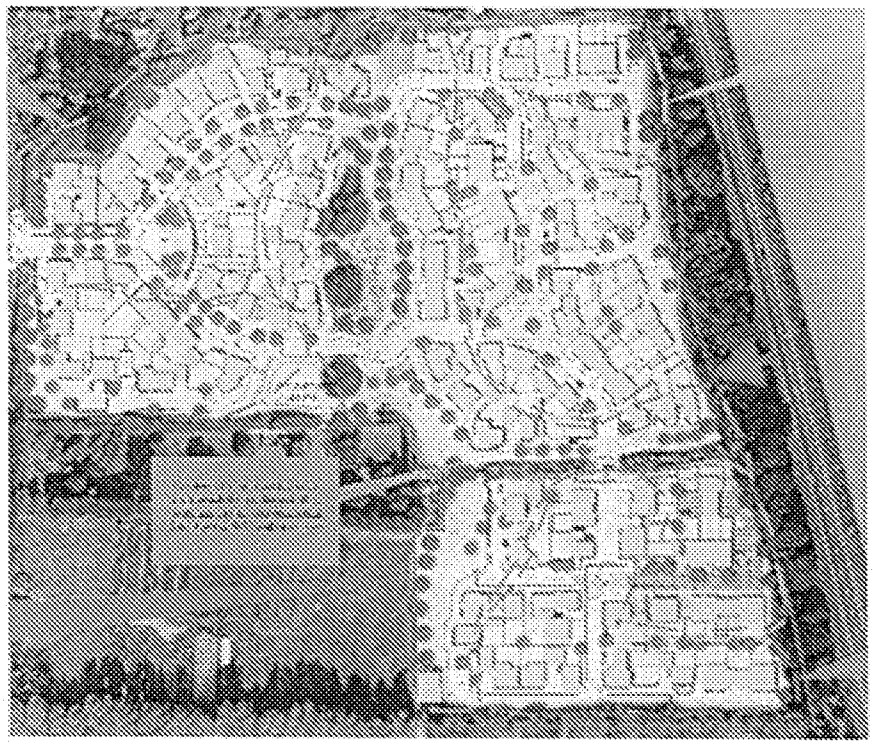


Figure 1: Aerial image of site and survey location

2. The affordable housing located at the extreme corners at the eastern site boundary will be less than half this distance from the A280.



3. Approximate location of the noise measurement instrumentation, using the site map from the "Landscape Strategy Plan" which provides a much clearer aerial view of the site boundaries.

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Current Habitat & Proposed Site Lay-out

1. The following schematics from the Ecology Assessment Report, allow for a comparison of the existing habitat features (including bat foraging routes and potential roosting), and the proposed site lay-out, including mitigation measures.

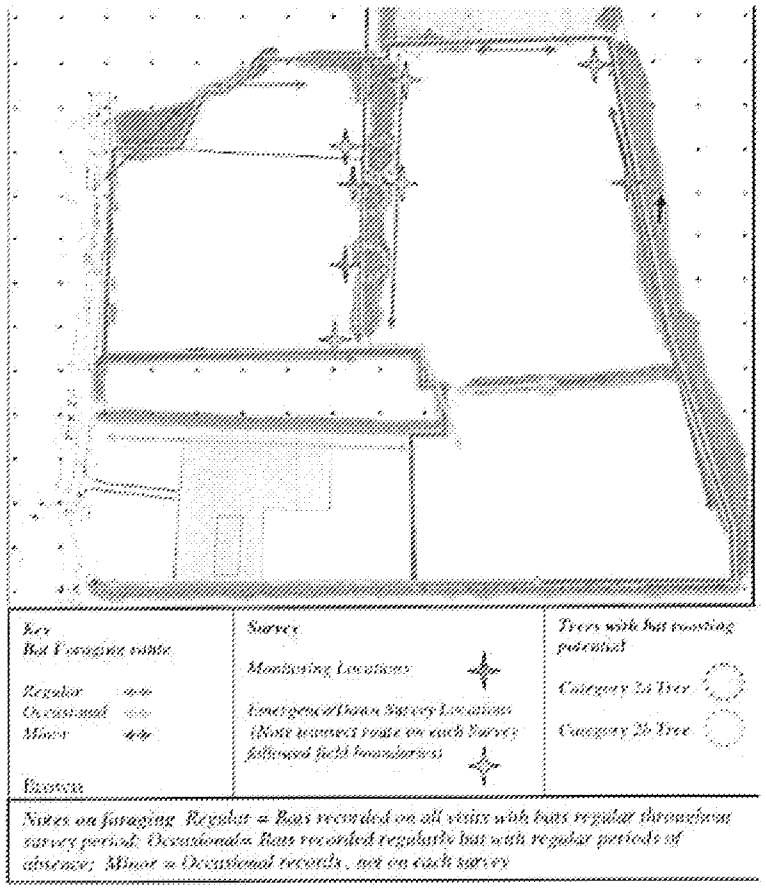

Figure 1: Existing habitat showing Bat Foraging Routes (Page 28)

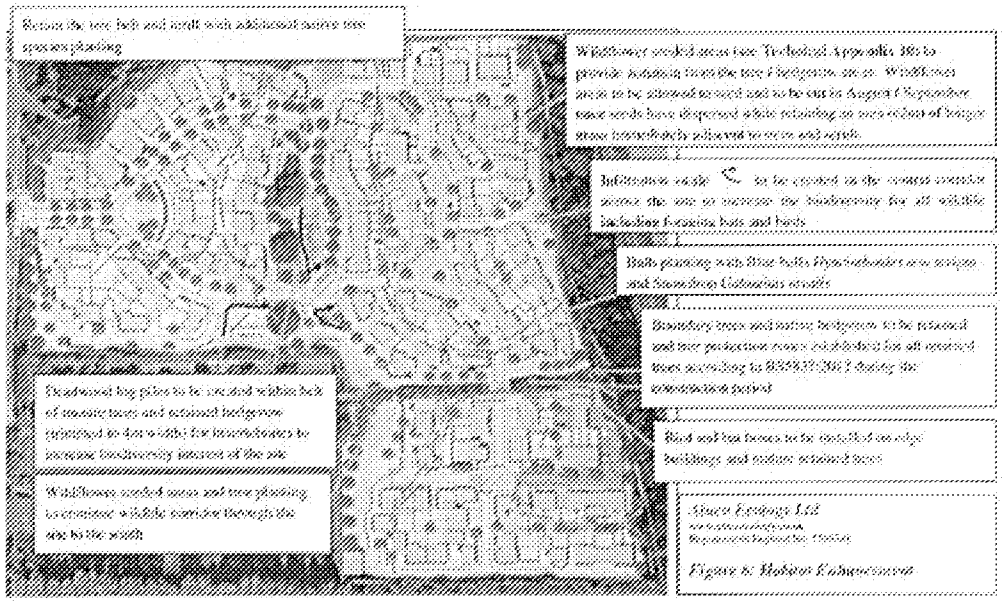

Figure 2: Proposed Site Plan showing north south hedgerow removal (Page 6)

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BIBLIOGRAPHY

The following documents have been referred to in this response:-

- Planning Application no. A/83/12, submitted by Barratt David Wilson Homes to build 150 homes on land east of Roundstone Lane, Angmering, with supporting papers.
- The National Planning Policy Framework (NPPF)
- The Regional Spatial Strategy (RSS) and attached South East Plan (SEP)
- Arun District Local Plan 2003
- Arun District Council Bramley Green Residents Survey 2004
- Arun District Draft Local Plan 2013-2028
- Arun Strategic Housing Land Availability Assessments (SHLAA) 2009 & 2012
- Arun Employment and Economic Land Assessment December 2010
- Arun Housing Land Supply Assessment September 2012
- Emerging Angmering Neighbourhood Development Plan (ANDP)
- ANDP Community Survey July 2012
- ANDP Housing Needs Survey October 2012
- Localism Act 2012
- Planning Appeal Decision for Goodacres, Barnham
- Planning Appeal Decision for Woodgate Centre, Westergate
- Dept for Communities & Local Government Urban and rural area definitions: a user guide
- West Sussex County Council "A Strategy for the West Sussex Landscape"
- ODPM Circular 06/05: "Biodiversity and Geological Conservation – Statutory Obligations and their impact within the Planning System"
- UK Biodiversity Action Plan (1995)
- Wildlife & Countryside Act 1981
- Bat Conservation Trust
- The Hedgerow Regulations 1997

- British Standard BS5837 2012 - Trees in relation to design, demolition and construction. Recommendations