Daun Johnson

From: Peter Cleveland
Sent: 27 November 2012 14:19
To: Planning.Responses
Subject: FW: A/82/12: LAND TO THE EAST OF ROUNDSTONE LANE, ANGMERING
Attachments: DWH Objection Letter 271112.pdf

Please could the attached be acknowledged as a letter of objection.

Thanks
Peter

From: Rosie Dinnen [redacted]
Sent: 27 November 2012 11:38
To: Peter Cleveland
Cc: Roger Sayer; John Blacker; Pete Sulley; James Garrett
Subject: A/82/12: LAND TO THE EAST OF ROUNDSTONE LANE, ANGMERING

Peter

Please find attached an objection letter to planning application A/82/12.
We submit these comments on the behalf of our clients West End Property LLP.

Would you be able to provide me an update as to how this application is progressing?
Is it scheduled to go to committee soon?

Regards

Rosie Dinnen
Senior Planner

Planning . Design . Delivery
[redacted]
Elizabeth House 1 High Street Chesterton
Cambridge, CB4 1WB

Phone [redacted]
Fax:
Web:

JustGiving's Workplace Fundraiser of the Year 2012

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BARTON WILLMORE

Elizabeth House
1 High Street
Chesterton
Cambridge
CB4 1WB

[redacted]

Mr P Cleveland
Arun District Council
Arun Civic Centre
1 Maltravers Rd
Littlehampton
West Sussex
BN17 5LF

Our Ref: 11192/A3/JG/

27 November 2012

Dear Sir,

LAND TO THE EAST OF ROUNDSTONE LANE, ANGMERING – PLANNING APPLICATION NO: A/82/12: RESIDENTIAL DEVELOPMENT COMPRISING 150 NO. DWELLINGS INCLUDING 30% AFFORDABLE WITH ACCESS, LANDSCAPING, OPEN SPACE & ASSOCIATED WORKS

This letter constitutes a formal objection to Planning Application No. A/82/12 (Land to the East of Roundstone Lane, Angmering) on behalf of our client West End Property LLP.

This objection focuses on the principle of development, issues of sustainability, visual impact and traffic implications. The issues have been considered having regard to the adopted Local Plan, the draft Local Plan and the National Planning Policy Framework. The letter is structured as follows:

- Principle of Development
- Landscape Impacts
- Highways Impacts

It will be demonstrated under the above sub-headings that the principle of development of the application site comprises inappropriate development on an undeveloped, open Greenfield site which is contrary to adopted and emerging local policy and national policy.

It will also be demonstrated that the site's proximity to the South Downs National Park will have an adverse visual impact on this important landscape designation.

Further, it will be demonstrated that, given the location of the site near the historic core and conservation area of Angmering, that the additional traffic generated by this development will contribute to additional traffic within this part of Angmering.

As such West End Property LLP considers that Planning Application A/82/12 should be refused, and these reasons are set out below in more detail.

As the adopted Local Plan is technically time expired and the emerging Local Plan is insufficiently advanced, reference is made to both documents; the former remains the statutory Development Plan for the District until the latter is adopted. Reference is also made to the National Planning Policy Framework (NPPF), which in some instances may take precedence if the policies in either the adopted or emerging Local Plan are not consistent with national policy. Paragraphs 214-216 of the NPPF advise the weight that can be given to existing and emerging plans and the NPPF.

Principle of Development

Whilst it is acknowledged that Angmering is a sustainable settlement that has been identified as suitable for future housing growth in the emerging Local Plan policy SP8, there are concerns regarding the suitability of this particular site for residential development. The application site comprises an undeveloped, open, greenfield site, with no buildings or hardstanding, crossed by mature hedgerows and trees. The site's open, undeveloped green nature has a landscape and amenity value, acting as a visual and spatial buffer between the South Downs National Park, which is in very close proximity to the Application Site to the north east and the historic core of the Angmering Conservation Area to the west.

The National Planning Policy Framework (NPPF) advises where development should be located, with paragraph 110 seeking to protect sensitive sites from development, stating that:

"Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework".

In that context, paragraph 111 sets out the sequential approach to site selection promoting previously used sites in advance of Greenfield sites and advises:

"Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value".

Further, paragraph 115 of the NPPF states that:

"Great weight should be given to conserving landscape and scenic beauty in National Parks..."

Whilst it is acknowledged that the Application Site is not within the National Park, it lies in very close proximity to it and this is therefore a material consideration, and this is dealt with in more detail below.

Consequently, the development of this open greenfield site would be contrary to the above provisions, which seek to ensure that previously developed land or land of least environmental or amenity value should be developed in advance undeveloped greenfield sites of higher environmental or amenity value. This is especially pertinent in this instance given that there are other sites on the edge of the settlement boundary of Angmering that are previously developed, or of less environmental or amenity value than the site subject to this planning application and are already covered in hardstanding or buildings, such as West End Nursery.

The development of the application site would be in conflict with Local Plan policies GEN2 and GEN3 as well as Draft Local Plan Policy SP2, which all seek to safeguard against inappropriate development outside of the settlement boundaries. This is further reinforced by the fact that the site is wholly undeveloped, open in nature and is a virgin greenfield site.

It is noted that the Application Site is included in the Strategic Housing Land Availability Assessment (SHLAA) (site 80) and has been categorised as 'Sites outside settlements with future potential'. However, its inclusion in the SHLAA is not an indication that the site is suitable for development nor does it guarantee its inclusion as a housing allocation in the draft Local Plan or the granting of planning permission. Site 80, the Application Site, is identified as having an indicative capacity of 290 dwellings but they are not projected to come forward until the 2018-2023 plan period. Therefore this planning application could be perceived as being premature.

It should be noted that the West End Nursery site is included in the SHLAA (site 48); although it is also within the category 'Sites outside settlements with future potential' due to Local Plan policies GEN2 and GEN3, it is identified as coming forward earlier in the plan period between 2016 and 2023 thus indicating that the Local Planning Authority has a preference for the West End Nursery site to be developed in advance of the Application Site (site 80), mostly likely on the basis that the site is previously used land unlike the application site.

Whilst the applicants have tried to justify the application on the grounds of 5 year housing land supply, which would appear to be a critical issue in Arun District based on recent appeal decisions, they have provided no evidence that Arun District Council cannot demonstrate a 5 year housing land supply within their Planning Statement, as required by the NPPF. Further, housing land supply is not, on its own, a sufficient ground to justify the development of this site; it is just one material consideration that has to be balanced with other planning policy considerations. It is considered that the approval of planning permission for this site would prejudice the Spatial Strategy for Angmering by allowing the development of a Greenfield site when there are alternative, more suitable sites available. The development of this site would develop a Greenfield site which would have detrimental impacts on the landscape, ecology and wildlife and is thereby contrary to the NPPF, Local Plan policies GEN2 (Built up Area Boundary), GEN3 (Protection of Countryside), GEN27 (Landscape Diversity) and GEN29 (Nature Conservation Across the District) and draft Local Plan policies SP2 (Built-up Area Boundary) DM26 (Development and Biodiversity) and DM27 (Protection of Landscape Character).

Landscape Impacts

An issue of prime concern is the landscape impact of the proposed development, especially given the site's proximity to the South Downs National Park, which lies to the north east, as well as its adjacency to the Local Gap designation which is designated to prevent the coalescence of settlements.

In terms of landscape character, the site falls within the National Character Area 126 (as defined by the former Countryside Commission), South Coast Plain and is also classified as type SC11 Littlehampton and Worthing Fringes in the West Sussex Landscape Character Assessment. Key characteristics of the SC11 designation as identified in the Landscape Management Guidelines (WSCC) include:

- Low lying flat open landscape;
- Frequent urban fringe influences of horse paddocks, light industry, airport, and recreational open space;
- Medium scale arable farming and market gardening, with clusters of greenhouses; and

- Long views to the Downs.

In addition, The Arun Landscape Study - Landscape and Visual Amenity Aspects of Development Choice in Arun District (August 2006) is a key evidence base document for the draft Local Plan to inform decision making on where new greenfield development might be accommodated within the District without an unacceptable impact on landscape character. The Study identifies that the Application Site lies within the Angmering Coastal Plan LCA42 designation, identifying its landscape capacity as

"Mixed urban edge landscape, partially enclosed, separates Angmering from Littlehampton', classifying it as having a landscape capacity of Low/ Medium."

However, this document predates the South Downs gaining its National Park status in 2010. The application site plays an important role as a buffer site between Angmering and the South Downs National Park, given its very close proximity and should be protected from development.

The NPPF emphasises the strategic importance of National Park designations and paragraph 115 states:

"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."

Therefore development within or in very close proximity to these nationally important designations need to be sensitively planned to respect the exceptional beauty of the special and sensitive environment. The development of this site encroaches on the landscape setting of the National Park and has a detrimental landscape and visual impact. The proposal therefore is contrary to the draft Local Plan policy DM27, which states:

"Protection of Landscape Character states that 'development will be permitted where: Landscape character, including its natural features, is conserved or enhanced. The historic character and development pattern of settlements is respected, taking into account their distinct identity and setting. Either individually or cumulatively development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped character of the area; and, it does not negatively impact on views into and out of South Downs."

In addition to the impact of the physical form of the development on views to and from National Park there are also other implications on the setting of the National Park such as light pollution.
Due to the Application Site's settlement edge location, it is considered that lighting of the development would result in any form of significant light pollution or intrusion, over and above what is existing, into an area of 'dark skies' which would be particularly intrusive on the South Downs National Park.

With regards to light pollution paragraph 125 of the NPPF states that:

"By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".

As a consequence, development of the site would be in conflict with the above policies of the NPPF, the existing Local Plan policy GEN33 (light pollution) and the emerging Local Plan Policy DM46. Although the application site is not within the National Park, it is in very close proximity to the site and will impact on the landscape as well as creating light pollution, over and above the existing situation, in an undeveloped area which will impact on the National Park.

Notwithstanding the obvious buffer function the application site plays between Angmering and the National Park, the site has not been included in the Local Gap designation, whereas the West End Nursery site and the Worthing Rugby Club lie within this local gap designation; West End Property LLP has submitted representations to the Draft Local Plan in relation to the designation of the Local Gap, with particular regard to West End Nursery, as they consider it inappropriate for a number of reasons. The justification for including the West End Nursery site in this designation is flawed and its function was queried by the Inspector at the last Local Plan Inquiry. Evidently now the National Park has been designated there would appear to be more justification to protect the land that surrounds the National Park in order to preserve its setting. This should be reviewed as part of the current Local Plan preparation process.

The need to protect the site from development is recognised within The Green Infrastructure Study (2012) which is an evidence base document for the emerging Local Plan. The study reviews the future growth areas which include the Angmering East Growth Area which the Application Site is located within. A key recommendation for the Growth Area is to:

- ***Create a buffer strip along the eastern and northern boundary to soften edge of development and to provide a screen from the National Park.***

Evidently the application site serves a purpose as providing a buffer to the National Park and should accordingly be protected from development.

In terms of the application submission, a Landscape Visual Impact Appraisal (LVIA) accompanies the application to appraise the landscape impacts of the proposal. However, the information presented in the report would appear to be selective. Firstly, the LVIA does not represent a worst-case scenario as the survey was undertaken in July 2011 during full leaf cover therefore the survey has not been conducted in accordance with the Landscape Institute best practice guidance. Secondly, the survey is also more than a year old and may not be an accurate reflection of the current situation. Thirdly, whilst the Zone of Theoretical Visual Impact (ZTVI) and the selected viewpoints are considered appropriate viewpoints to assess the impact of the proposal, the quality of the photographs are poor as a number of the photographs would appear to have been deliberately taken from perspectives with manmade structure disrupting views such as fencing, sign posts and gates. Whilst three of the viewpoints are taken from footpaths within the National Park, little reference is made to the National Park and its setting which would be expected given the site's proximity to the designation and the potential for a significant landscape impact given the adjacency. Therefore it is concluded that the LVIA does not provide a comprehensive assessment of the landscape impact of the proposal with regards to the intervening views to and from the National Park and further work should be undertaken.

Highways Impacts

Owing to the location of the site to the north of Angmering and near the A280 junction it is likely that vehicles will be drawn through the heart of the historic core of Angmering, which is characterised by narrow streets and on-street parking where traffic problems are already acute.

The tight-knit built form of the centre of Angmering is fundamental to Angmering's character that has ultimately contributed to its conservation area designation status. This development will have an adverse impact on the character and appearance of the Conservation Area, principally by the traffic movements generated by the development as due to the site position residents would be less inclined to travel south along Roundstone Lane. Therefore the proposal would contribute to additional traffic within the historic centre of Angmering. The proposal therefore is contrary to the objectives of policy AREA2 which seeks to preserve or enhance the character or appearance of a Conservation Area or its setting.

The applicants have tried to demonstrate that their site is sustainable; however, the site is a beyond a reasonable walking distance from the railway station and therefore the residents would be disinclined to travel by train or resort to driving to the railway station. Indeed this fact is conceded in the submitted Planning Statement (page 27) which states:

"The railway station is beyond the recommended minimum walking distance but can be accessed by bus or cycle."

The proposal is thereby contrary to the NPPF as paragraph 30 which encourages the use of sustainable transport modes:

"Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport".

The policy approach of promoting alternative means of transportation to car based travel is reflected in the adopted Local Plan Policy GEN14 and the Emerging Arun Local Plan Policies SP18 and Policy DM21. The proposal is therefore contrary to these policies.

Conclusions

This letter has outlined the key reasons for objection based on issues of sustainability, visual landscape impact and traffic. The issues have been considered having regard to policies of the extant 2003 Arun Local Plan, emerging Local Plan, and the National Planning Policy Framework. The key objections can be summarised as follows:

Principle of Development

We have concerns regarding the suitability of this particular site for residential development. The application site comprises an undeveloped, open, greenfield site, with no buildings or hardstanding, crossed by mature hedgerows and trees. Development of the application site would be in conflict with Local Plan policies GEN2 and GEN3 and Draft Local Plan Policy SP2, which seeks to safeguard against inappropriate development outside of the built-up area boundary. This is further reinforced by the fact that the site is wholly undeveloped, open in nature and is a virgin greenfield site.

Housing land supply is not, on its own, a sufficient ground to justify the development of this site; it is just one material consideration that has to be balanced with other planning policy considerations. Further, the applicant has not demonstrated that there is a lack of a 5 year housing land supply. In this case, the landscape and amenity value that this site provides as a Greenfield site, together with other planning considerations, have significant weight.

Landscape Impacts

There are concerns regarding landscape impact as a result of the proposed development. The principle objections relate to the location of the site in relation to the South Downs National Park, and the location of this largely undeveloped site adjacent to the Local Gap. Development of the site would be in conflict with policies contained in the NPPF, the adopted Local Plan and the Emerging Local Plan.

Highways Impacts

Owing to the location of the site to the north of Angmering and near the A280 junction it is likely that vehicles will be predominantly drawn through the heart of the historic core of Angmering, which is characterised by narrow streets and on-street parking where traffic problems are already acute. Development of this site would be in conflict with policies in the NPPF and the Emerging Local Plan.

West End Property LLP believes that the development of this site would be inappropriate and would not accord with the policies of the Development Plan or the NPPF. There are other sites within Angmering, such as the West End Nursery site, which would be more suitable for development. Other sites within the Angmering East Growth Area are not virgin greenfield sites, are more developed and urban in character, and have a reduced impact on landscape and visual amenity as well as transport advantages when compared with the application site.

As such, West End Property LLP respectfully requests that planning application A/82/12 for 'Residential development comprising 150 no. dwellings including 30% affordable with access, landscaping, open space & associated works' is recommended for refusal taking into consideration the above grounds.

Yours sincerely,

JAMES GARRETT
Planner

cc John Blacker
R Sayer