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**From:** Rita Williams [REDACTED]  
**Sent:** 28 June 2017 21:32  
**To:** Planning [REDACTED]

**Subject:** OBJECTION: A/99/17/OUT Land South of Water Lane

I strongly **OBJECT** to this application for the following reasons:

1. This site has already been assessed by Arun and was REJECTED for development in the Angmering Neighbourhood Plan and in the 2014 version of the Arun Local Plan.
2. At Local Plan Examination, NO challenge or objection was raised disputing the reasons behind Arun's decision to REJECT this site. The only issue raised was that not ALL of the land north of Water Lane had been assessed for its suitability for development.
3. As a 1<sup>st</sup> Phase of the wider Strategic allocation, application A/99/17/OUT does NOT provide any clear evidence that *"the proposed development is able to demonstrate that it does not adversely affect the delivery of the whole allocation and that infrastructure can be delivered as a proportion of the whole allocation"*. A requirement stipulated by ADC should a developer choose to submit an application ahead of the Local Plan re-examination. This application fails to do this. There are also clues throughout the application that the VIABILITY of the wider **Angmering North** Strategic allocation, which includes the proposed Employment site, is in question. For this reason alone, the application should be **REJECTED**

**Masterplan:** No detail of any kind been submitted with the application to suggest how the site fits with and supports the delivery of the much larger **Angmering North** allocation for a potential 600+ dwellings north of Water Lane. It is worrying that the documentation confirms that two versions of a Full Masterplan do exist, but they are STILL being worked on with Arun. Rydon have control of both sites north and south of Water Lane, so there is no 3<sup>rd</sup> party involved. One can only assume Rydon considers production of a Masterplan at this point in time as incidental and therefore it also falls into the category of "Reserved Matters".

**Flood Risk to Others:** The larger **Angmering North** allocation (north of Water Lane and west of Dappers Lane) also has the problem of surface water runoff into the Black Ditch. The risk of downstream flooding from discharge onto Water Lane and Dappers Lane needs to be addressed

holistically ACROSS ALL 3 SITES, with a proposed drainage solution and ownership of ongoing flood prevention management agreed before this site is approved in isolation.

Despite the suggested inclusion of man-made drainage, how will the water get away from this site and what role will it play in managing runoff from the much larger site that is being proposed to the north of Water Lane.? How is the existing Black Ditch culvert expected to cope with this?

**Evidence:** Arun commissioned updated versions of the Local Plan reports that relate SPECIFICALLY to this site. If it is truly considered to be Phase 1 of the Angmering North allocation, WHY does Rydon ignore Arun's Pre-Application Advice to take into consideration the evidence in these reports, against which all the other proposed Strategic sites will be assessed at Examination? The reports were available in February, yet Rydon chose to commission its own studies.

**Landscape:** The Arun Landscape Study 2016 again confirms that the character and setting of the surrounding rural landscape (on the boundary of the National Park and the settlement of Angmering - albeit divided by the A280) would be adversely affected by the proposed development.

Rydon however ignores the findings of the Arun Landscape Study 2016, choosing instead to rely a version dated 2006 that looks at the broader landscape in which this site sits, rather than the assessment of the actual site itself provided in the Arun 2016 study.

**Road Infrastructure:** The application also ignores the findings of the revised Arun Transport Study 2016, which assesses **Angmering North's** impact on the wider road network and apportions the cost of mitigation against the allocation. Instead, Rydon uses the 2013 Transport Study on which to base its evidence. Even then, failing to mention, or consider in its calculations, the reports recommendation to provide an A280 link road to relieve pressure on the A259. Therefore, the findings of the Rydon report can not be considered sound.

4. Rydon's "smoke and mirrors" approach to gain approval for this "Strategic" site OUTSIDE of the Local Plan re-examination means it has to be treated by the DCC like any other normal planning application. The committee will not be able to take into account Arun's Local Plan updated evidence base, or the Consultation responses to the main modifications of the Local Plan, which included the addition of this site as Strategic.

Members can ONLY base their decision on the evidence the developer has chosen to submit.

Therefore, surely any decision made by the DCC without taking into account ALL of the available information on this site; that is, evidence supplied by documentation and Consultation responses available to the Inspector at Local Plan re-examination, must be regarded as UNSOUND. For this reason the application should be **REJECTED**

5. If this site is approved based on the selective evidence provided by the developer and is supported by officers because it is part of the proposed **Angmering North** strategic allocation, it must be seen as an attempt to PRE-DETERMINE the outcome of the proposed Angmering North allocation at Local Plan examination.
6. The worry is that Arun has already agreed that Rydon ONLY need to seek outline approval on Highway access. Despite the indisputable fact that the information accompanying the application on the matters of landscape, flooding issues, impact on the setting of the South Downs National Park and Angmering Conservation indicate that these matters MUST be considered as MATERIAL in assessing the site's suitability for development.
7. Rydon claims that based on its own studies, "*the residual impacts*" on landscape, the setting of the Southdown's National Park and Angmering Conservation area, "*would be outweighed by the*

*substantial benefits that the Proposed Development would deliver in providing much needed housing and affordable housing” to meet the increased OAN .*

8. It is clear that there are other sites in Angmering that are far more suitable for development than this site. Many of which have come forward with planning applications since the suspension of the Local Plan examination. By my reckoning, adding 175 dwellings (coincidentally!) to the parish’s contribution, with another potential 30+ in the pipeline on sites allocated to the parish in the Angmering Neighbourhood Plan. This figure does not include the 61 dwellings approved in addition to the original numbers on Roundstone Lane. Rydon has chosen not to include any of these in their committed planning application numbers when assessing Highway impact. Other sites are also expected to come forward as a result of the recent call for sites. Providing Arun with the much needed boost in housing numbers.
9. This site is part of the strategic **Angmering North** allocation, therefore what is the pressing need to “fast-track” this application? Why not wait for just a few more months and have it go through the re-examination of the Plan examination in the normal way? What are Rydon afraid of?
10. It is obvious Rydon are not confident that the issues surrounding development on this particular site and their proposed “mitigation measures” on “reserved matters” will stand up to independent scrutiny by a government Inspector against the Arun’s own background studies and the evidence submitted as part of the Local Plan Consultation process.
11. The application was posted on Arun’s Planning Portal the day the Local Plan Consultation ended, with determination (agreed with Arun by means of a Planning Performance Agreement) to take place BEFORE the start of the Local Plan re-examination scheduled for September. Is this an example of what is meant by the term “**gaming the system**”, engineering the publication dates of the application **and manipulating bits** of the normal Planning and Local Plan decision making processes that benefit them. Surely a case of heads Rydon wins tails you lose!

Regards

Rita Williams