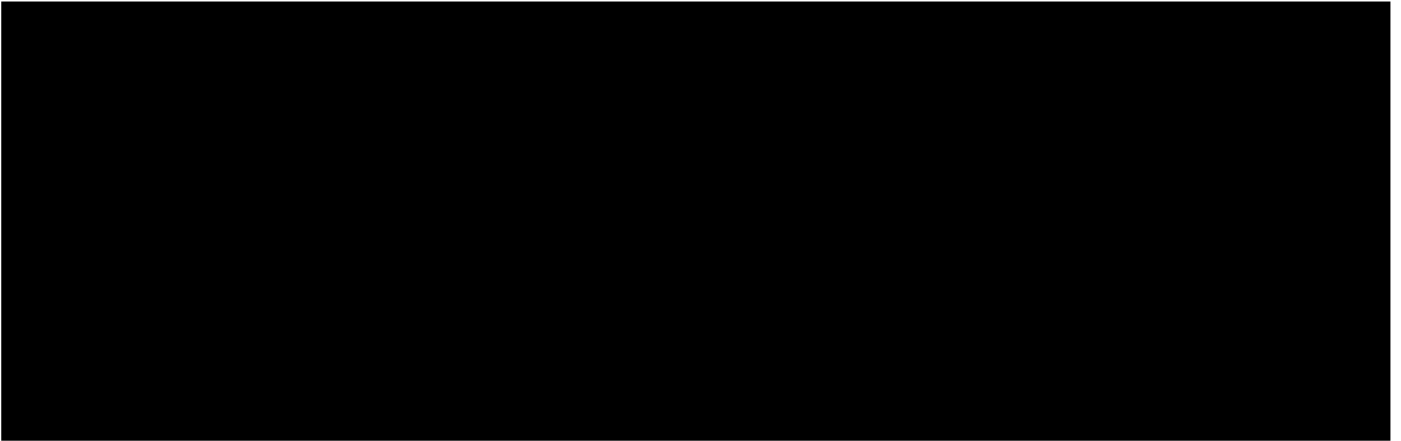






From: Kia Trainor [REDACTED]
Sent: 01 August 2017 10:44
To: Planning; Michael Eastham
Subject: A/99/17/OUT: Outline application with some matters reserved (Access only) for development up to 175No. residential dwellings, public open space, play areas with associated infrastructure including roads, drainage & landscaping.

Dear Mr. Eastham

Although the public consultation period for the above application has closed, would you accept the attached comments from CPRE Sussex for consideration?

Many thanks

Kia

Kia Trainor
Director, CPRE Sussex

CPRE Sussex Branch CIO, Brownings Farm, Blackboys, East Sussex TN22 5HG
[REDACTED] www.cpresussex.org.uk Registered Charity Number 1156568

We exist to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

Follow us on Facebook: www.facebook.com/CPRESussex and Twitter: @cpresussex
Join us! Or donate: <http://www.cpresussex.org.uk/how-you-can-help/join-or-donate/join-us>



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
phone: 01825 888975
e-mail: info@cpresussex.org.uk
www.cpresussex.org.uk

Michael Eastham
Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF
By email: planning@arun.gov.uk and michael.eastham@arun.gov.uk

30th July 2017

Dear Mr Eastham

**A/99/17/OUT: Outline application with some matters reserved (Access only) for development up to 175No. residential dwellings, public open space, play areas with associated infrastructure including roads, drainage & landscaping. This application affects the character & appearance of Angmering Conservation Area & the setting of Listed Buildings. This application is a Departure from the Development Plan.
Land South of Water Lane, Angmering**

This is the formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above application. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

In summary, CPRE Sussex **objects** to this application on the grounds of harm to a heritage asset and harm to the character and setting of the South Downs National Park, with consequent failure to comply with paras 126 and 115 of the National Planning Policy Framework (NPPF) which is a material consideration.

In accordance with paragraph 14 of the Framework, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the NPPF taken as a whole or specific policies (such as those protecting heritage assets or the landscape and scenic beauty of National Parks) indicate that development should be refused.

The purpose of the planning system is to contribute to the achievement of sustainable development according to para 6 of the NPPF. The NPPF constitutes the Government's View of what sustainable development means in terms of planning. The planning system should guide development to sustainable solutions (NPPF para 8.) Pursuing sustainable development involves seeking positive improvements in the quality of the historic environment (NPPF para 9) and planning should always seek to conserve heritage assets so they can be enjoyed by future generations (NPPF para 17.) Consideration of the historic environment and its heritage assets is a principle objective of sustainable development in planning terms. The NPPF contains specific policies that require 'great weight' to be given to conserving heritage assets and a clear and convincing justification for any harm to significance, however slight and whether through direct physical impact or by change to the setting. The NPPF para 126 tasks LPAs to recognise 'that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.'

The Southern boundary of the site abuts the Angmering Conservation Area. Para 134 of the NPPF states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use'. CPRE Sussex believes that the wider benefits of the proposal do not outweigh the possible harm to the significance of the designated heritage asset.

A recent appeal (ref APP/U1430/W/16/3150796, Pashley Road Ticehurst) recognises that 'although the housing land supply shortfall is substantial and as such likely to take some time to bridge, it is also likely to be only a temporary situation, whereas the harm to the significance of the heritage assets would be more permanent.' In terms of mitigation, the proposed tree and shrub planting to reduce inter-visibility between the site and the Angmering conservation area are not adequate. As pointed out in a recent appeal (ref APP/D3830/W/16/3165199, Turners Hill) "the purpose of landscaping is not to hide otherwise unacceptable development, but to permit the successful integration of development into its surroundings." CPRE Sussex believes that the harm to heritage assets associated with this application is not outweighed by the public benefits in terms of increasing housing supply in accordance with para 134 of the NPPF. The balance under para 14 – 'specific policies in this Framework indicate development should be restricted' weigh against the proposal.

Paragraph 14 of the National Planning Policy Framework requires Local Plans to meet objectively assessed needs (there is no reference in this paragraph to "full") "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted". Footnote 9 to this paragraph gives examples of such specific policies, which include that in paragraph 115: "Great weight should be given to conserving landscape and scenic beauty in National Parks". The application site is clearly within the setting of the National Park. It is therefore necessary to have regard to the purposes for which the SDNP was designated, which are to conserve and enhance natural beauty, wildlife and cultural heritage and to promote opportunities for the understanding and enjoyment of their special qualities by the public (PPG Natural Environment para 003) It is also necessary to bear in mind that the Framework states that great weight should be given to conserving landscape and scenic beauty in National Parks.

The Arun Landscape Study assesses the Ecclesden Hills Landscape Character Area as having a moderate/high landscape character with substantial sensitivity to change. This site is clearly of high sensitivity and the development would have a significant adverse effect on the local landscape character. Even the mitigation measures proposed would not satisfactorily change this. The suggestion

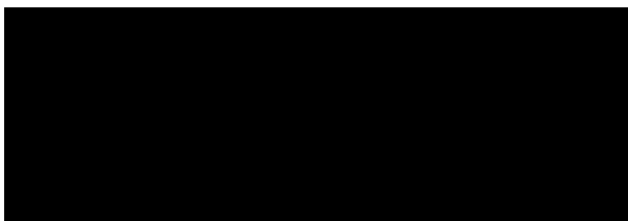
of a landscape buffer between the development and the A280 to limit views from the National Park would not satisfactorily screen views.

It is our view that this proposal even at outline stage, but with indicative proposed layout, elevations and landscaping, would cause unacceptable harm to the setting of the National Park and would not conserve or enhance its visual and landscape quality and character and should therefore be refused.

In conclusion, application of the Framework demonstrates that the adverse impacts of this proposal would significantly and demonstrably outweigh the benefits. Therefore, the proposal does not represent sustainable development, as that term is used in the Framework. This is a material consideration which indicates that the application should be refused.

We trust these points will be taken into account in determining this application.

Yours sincerely,



Kia Trainor, Director, CPRE Sussex