

From: Amanda Scholes on behalf of Planning.Responses
Sent: 20 November 2020 11:54
To: Planning Scanning
Subject: FW: Planning Consultation on: BN/112/20/EIS

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Save the environment - think before you print.

From: Sue Howell <Sue.Howell@arun.gov.uk>
Sent: 19 November 2020 17:02
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: James Cross <James.Cross@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/112/20/EIS

Response to Planning Application

From: Arun District Council Leisure & Greenspace

Date: 19/11/2020

Application ref: BN/112/20/EIS

Description: Environmental scoping opinion for up 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields and early years provision (nursery).

Location: Land at Barnham, Eastergate and Westergate

Determining Authority: Arun DC

Summary recommendation: ADC welcome early and continued consultation throughout this development progression and the opportunity to discuss and conclude policy requirements. This jointly forms the presently largest planned development proposal within the District. There are significant constraints within this site along with huge opportunities here for increased accessible public open spaces, the formulation of desirable

living areas, improved transport links, integrated leisure facilities and the potential to enhance and add to the character in this local area.

Comments

Relevant landscape designations

This proposed development site has character areas, conservation areas and ancient monuments. The site borders the listed St Georges Church and 3 listed Farm buildings. The development site offers direct views to the South Downs National Park to the north.

Response

This site will form part of a known strategic allocation SD5 identified in ADCs adopted Local Plan 2011-2031 (July 2018)

The scale of the development, is such that the impact of the development will be significant and the capacity of the infrastructure to serve the development critical.

Crucial to the design of the development is the need for a detailed masterplan in order to understand the differing elements and inform where the uses will be. Measures to include within the proposals the well-connected leisure and recreation provision along with environmental, sustainability and biodiversity net gain as part of the masterplan design should be made. All nature conservation features within the development site including existing habitats, trees, hedges, watercourses and other features should be incorporated into the site design and protected from change.

The design of the site should promote a high-quality development that respects, maintains and enhances the local landscape character. This new development should consider the character and distinctiveness of the area reflecting local design characteristics where possible and its setting with the surrounding countryside and rural fringe. This proposed development has the potential to change significantly this area.

Key to early masterplans and consultation has been the focus on the Lidsey Rife – Linear Park concept which is to form many functions not least to provide a public accessible valley country park feature, to preserve the separate identities and avoid further coalescence of the Three villages. The concept is to protect from these from continuous urban form, to facilitate pedestrian and cycle links north/south, to allow for nature recovery with the incorporation of wild areas, to protect natural connected areas allowing for wildlife to be integrated within the wider landscape. The importance of retaining this large open space as an intact and integral element of the design should not be overlooked or allowed to diminish.

There will be a requirement for quality play provision throughout the development. These will be required in many forms from unequipped natural play to equipped provision offering varied and challenging play opportunities. Detailed consultation and discussion will be required for the development brief to incorporate these LAP, LEAP, NEAP and other sports and ancillary facilities. Connecting pathways for accessibility, seats, bins and signage all forming part of this provision.

A key requirement within the proposals will be the need for Leisure provision in the form of a sports hub facility, ideally co-located with other facilities and forming part of a wider leisure/recreation offer. The design and location will require consideration in relation to Active Design Principles. The mix of pitches and associated required changing facilities would need to be clustered rather than a linear layout. It is unclear from the proposals, the scale of and where the intended pitch provision and ancillary facilities are to be located and how they connect to the wider development. ADC would suggest that the area south of the railway line, linking with the green corridor would appear appropriate and would discourage the siting of these into the flood zone or the odour zone exclusion areas.

The Arun Local Plan 2018 Chapter 14: Health, Recreation and Leisure sets out the Council's approach, priorities and policies relating to open space, sport and recreation provision.

Policy OSR DM1 'Open space, sport & recreation' requires that new developments contribute appropriate forms of provision and or enhancement as identified via the Open Spaces, Playing Pitches and Indoor Sport & Built Facilities Strategies. These evidence-based studies identify the need for Community Sports Hubs in certain locations including at Barnham, Eastergate and Westergate (BEW) as part of the strategic development site.

Good access for walking and cycling routes would promote green transport to the Community Sports Hub from within and outside of the development. The inclusion of shared use pedestrian/cycle routes in and around the development would be expected.

Off-site contributions towards swimming pool, ancillary provision and associated costs will be required.

POS areas will need to connect within and beyond the development site promoting and enhancing footpath and cycle links and their use within the wider area. Consideration should be made to the siting of open space and buffer areas and their use in softening and integrating the proposals with the existing residential development on this fringe. POS should be considered not only for the larger open character areas but also to create sense of place, desirable living areas and distinctiveness within the plot areas.

The differing needs of the proposed development will each require a different approach to setting and how the immediate landscape works for all. Commercial, retail and employment requirements may require safe and contained landscape areas within the proximity of the buildings, but which also integrate with the wider setting. This development triggers specific needs re onsite provision of features such as allotment/community orchard, wellbeing, fitness and POS provision.

The management proposals for all public realm and open space areas with specific and complex typologies will need to be detailed. The ultimate success or failure of the landscape proposals and public access to them, will depend on adequate provision for this in future. This must include a clear directive of envisaged responsibility and set out with this statement explaining how the differing typologies will be maintained ie responsibility and regime. Discussion with the LPA will be required to ensure that the maintenance and public accessibility needs will be met and financial contribution towards maintenance would need to be concluded were they be become the responsibility of the LPA.

Arun Local Plan 2011-2031 (Adopted July 2018)

Policy OSR DM1 'Open space, sport and recreation' requires that new developments contribute appropriate forms of provision and or enhancement as identified via the Open Spaces, Playing Pitches and Indoor Sport and Leisure Facilities Strategies

Policy HWB SP1 states: *'All development should be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular regard shall be had to: -*

- a. Providing or contributing to the necessary infrastructure to encourage physical exercise and health, including accessible open space, sports and recreation facilities (including outdoor fitness equipment) and safe, well promoted, walking and cycling routes.*
- b. Creating mixed use development and multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other; and*
- c. Ensuring that arts and cultural facilities are accessible to all residents and visitors to the District'*

Green Infrastructure and the Bognor Regis GI Framework

Well-connected Green Infrastructure assets perform a range of important functions relating to the natural environment, climate change mitigation and adaption and quality of life.

The Bognor Regis GI Framework, A Landscape & Green Infrastructure Framework Connecting Bognor Regis to the South Downs National Park makes clear reference to this strategic development site which is fundamental to the delivery of the strategic document. It sets out clear guidance, project proposals and reviews policy for the delivery of the GI relevant to the strategic site and connections to it. The masterplan for the site will need to make clear references to this framework document.

The incorporation of allotments will be a requirement within these proposals and consideration of community orchard facilities.

Policy GI SP1 (Chapter 7 of the Local Plan) cites all major developments must be designed to protect and enhance exiting Green Infrastructure assets and the connections between them, in order to ensure a joined up Green Infrastructure Network.

The Policy requires that where compatible with nature conservation objectives, development proposals must identify opportunities to connect existing Green Infrastructure assets with the coast, the South Downs national Park or to the Districts inland villages.

The policy further states that opportunities to enhance the network should take account of the multiple functions of Green Infrastructure assets and should be based upon those opportunities set out in **Policy GI SP1 ‘Green Infrastructure and Development’**

Arun landscape Study August 2006 – Landscape and Visual Amenity Aspects of Development Choices in Arun District 2006-2026. This document assesses the physical environmental constraints on development of green field land in the District with a view to identifying the capacity of the Arun District landscape to accommodate future development.

(le informs/scores the landscape sensitivity of a site to accommodate change)

ADC Bognor Regis GI Framework ‘A Landscape and Green Infrastructure Framework Connecting Bognor Regis to the South Downs National Park’ (Nov 2019) to be used for the connection vision from coast to South Downs.

Both LVIA and EIA will be required, qualifying under Schedule 2 due to the size of development and development characteristics, this should include assessments of the visual effects of the development on the surrounding areas landscape which will detail any physical effects of the development such as changes in topography. The EIA should include full assessment of the potential impacts of the development on local character. An LCA (Local Character Assessment) should be undertaken and used as the basis for guiding, informing and understanding the ability of the location to accommodate change and to inform positive proposals for conserving, enhancing and regenerating character as the detailed proposals are developed.

The proposals should incorporate measures to help encourage people to access the surrounding countryside. The retention and reinstatement of existing footpaths and the creation and incorporation of new footpaths and cycle ways to create links to other green networks. The sites urban fringes should be designed to promote the creation of a wider green infrastructure. The ADC strategy on green infrastructure to be considered and incorporated

SuDS

Policy W DM3 of the Arun Local Plan requires major development to integrate SuDS into the overall design of the development.

The primary purpose of SuDS is to minimise the impact of urban development on the water environment, reduce flood risk and provide habitats for wildlife. SuDS should increase the levels of water capture and storage.

It is essential that SuDS do not impact on the usable levels of public open space also required as part of new housing developments. SuDS whilst providing benefit in the correct capacity within development, should not be included in the 'usable open space calculations'

It is believed that water table monitoring is ongoing and therefore the full extent of the impact of the SuDS on the site and wider open space is not concluded.

We would be looking for a connection between both the blue and green infrastructure features within the development and for the design of these to enhance the setting rather than just function as stand-alone elements.

Consideration should be given to the large area of Flood Zone 3 which extends along the Lidsey Rife and for a large extent of the Linear Park area. Additional drainage provision from the site should not be at the expense of allowing this to be accessible and remain as a year-round POS provision.

Impact

The potential impact on the location would require that Landscaping be provided as mitigation towards screening and softening of the development.

Extensive views into and from the development site to the South Downs to the north must be promoted and given careful landscape opportunity consideration.

Early consideration and evaluation should be made of existing topography and green assets. A tree survey of the application site will be required to highlight the importance of, and protection requirements for retaining trees and hedgerows. Any tree work operations at the site to be discussed in advance with Arun District Council's Tree Officer.

As a general principle of design, careful consideration should be given to the intended land use beneath existing canopy of established trees and their potential for further growth above and below ground (root and crown extension). With such a large and open site to work with we expect a detailed layout proposal to place great emphasis on eliminating future 'residential pressure to prune' of retained trees and avoid any intrusion into Root Protection Areas (BS5837:2012).

Trees which display considerable landscape and/or ecological value should be incorporated into an area of open space and be so remote from any development such that they can project (existing or potential) veteran status without being subject to any risk mitigation pruning works in the future.

Initial desktop review suggests that there are trees and hedgerow of landscape and ecological value around and across the site. Those may also provide valuable screening and could be incorporated within buffer zones.

It is anticipated that a substantial number of individual and groups of trees considered desirable for retention will also qualify for statutory protection (Tree Preservation Order). A full site assessment is to be undertaken shortly by our Parks and Greenspace Team and recommendations made to the planning department.

Mitigation/requirements

An existing green boundary is evident in places, indicated buffer zones and further boundary planting treatment will need to demonstrate the ability to enhance and improve. A robust and detailed landscape scheme will be required within these proposals for all areas of development and POS to increase biodiversity and habitat within this rural fringe site.

All greenspaces should be considered and valued and their connection for biodiversity and habitat explored. Tree specification should be at a size which allows instant impact, but which will establish and mature as the site develops.

Recommendation/Conclusion

ADC welcome early and continued consultation throughout this development progression and the opportunity to discuss and conclude policy requirements. This jointly forms the presently largest planned development proposal within the District. There are significant constraints within this site along with huge opportunities here for increased accessible public open spaces, the formulation of desirable living areas, improved transport links, integrated leisure facilities and the potential to enhance and add to the character in this local area.

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From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 03 October 2020 10:49

To: Tree Landscape <Tree.Landscape@arun.gov.uk>

Subject: Planning Consultation on: BN/112/20/EIS

To: **Parks and Landscapes**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

TOWN AND COUNTRY PLANNING ACT 1990

Application No: BN/112/20/EIS

Registered: 23rd September 2020

Site Address: Land at Barnham, Eastergate and Westergate

Grid Reference: 494767 104607

Category:

Description of Works: Environmental scoping opinion for up to 1500 dwellings, community facilities, local centre (shops and services), a primary school and associated playing fields and early years provision (nursery).

Town & Country Planning Act 1990 (as amended)

Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Consultation on Request for a Scoping Opinion

An application has been lodged for a scoping opinion. The Council has to respond in writing stating what information needs to be provided as part of an Environmental Statement that might be required in connection with the proposed development.

The development is described in the attached plans and written material:

[Click here to view documents available on our website](#)

[Click here to view the status of the application.](#)

I would be grateful for your electronic comments made on the website or by emailing to planning.responses@arun.gov.uk by **24th October 2020**.

Please be aware that any comments you may make will be available to view on our website

Please note the importance of the scoping opinion to any subsequent Environmental appraisal process. If you are in any doubt as to what is being requested please see the above regulations.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

James Cross

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FLCONEIS (CDS) 2020