Land West of Church Lane, Clymping, West Sussex

Planning Application for the Development of up to 300 Dwellings with Associated Landscaping and Supporting Infrastructure

Summary of Submissions Statement



On behalf of Mulgrave Properties LLP

December 2016

PARKER DANN

ARUN DISTRICT COUNCIL CM/1/17/OUT

1 Introduction

1.1.1 Arun District Council's validation requirements ask that for development of this nature that a summary of documents submitted be furnished. This document meets that requirement.

1.1.2 The table below summarises the proposed development

Development Summary

Indicative Number of dwellings	Circa 300 dwelling
Community Uses	Community building and retail unit, public open space and public footpaths
Indicative Bedroom Range	1, 2, 3, 4, 5 bedroom properties
Indicative Storey Heights	Bungalows, 2 and limited 2.5 storeys
Indicative Property Types	Detached, Semi Detached, Terraced and Bungalows

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1.1.3 The full list of documents submitted is included below.

Forms and Plans

Application Form including ownership certificates;

Block Plan

Location Plan

Illustrative Master Plan

Reports

Arboriculture Survey

Affordable Housing Statement.

Bat and Badger Report

Design and Access Statement

Ecological Survey (Phase One)

Great Crested Newt Survey

Historic Environment Desk based Assessment

Landscape and Visual Impact Assessment

Noise Assessment

Planning Statement

Flood Risk Assessment

Surface Water Drainage

Traffic and Transport

Summary (this document)

1.1.4 Key findings of the various submitted documents are summarised below under headings as appropriate.

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1.2 Application Form and Plans

1.2.1 The key point to note from the form is that the application is in outline and is accompanied by a site location plan and a block plan which identify the boundaries of the application site.. The form contains the precise terms of the application which is as follows:-

> *"Outline application for the erection of up to 300 dwellings and ancillary development comprising open space, a building within use class D1 of up to 875 square metres net, a building for A1 use having a floor area of up to 530 sq. metres net, together with open space and ancillary works, including car parking and drainage arrangements, with appearance, landscaping, layout; and scale wholly reserved for subsequent approval. The access detail, showing the points of access to the development, and indicated on Bellamy Roberts drawings numbered 4724/004 and 4724/005 are access proposals to be determined at this stage of the application. For the avoidance of doubt all other access detail within the site is to be determined as a reserved matter at a later stage. "*

1.2.2 The application is accompanied by an illustrative Master Plan which does not form part of the terms of the application but shows in practical and realistic terms how the site may be developed.

1.2.3 It is open to the Council to require the detailed submissions flowing from a grant of outline planning permission to broadly accord with the principles set out in the Master Plan. It is quite normal in schemes of this size to submit planning applications in this manner.

1.3 Reports

Arboriculture Survey

1.3.1 The arboriculture survey was undertaken to record the condition and value of all

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significant trees at the site as well as the material constraints they pose on the development. The information in the arboriculture report should be used to guide the design proposals.

1.3.2 To comply with BS5837: 2012, it is recommended that an arboriculture impact assessment be produced when the proposed layout has been finalised. The arboriculture impact assessment should include a schedule of trees to be retained and removed, evaluate the likely effects of construction works on retained trees including post development pressures and provide recommendations on mitigation measures to be implemented. It should also include a Tree Retention Plan.

1.3.3 As far as possible new buildings and areas of hard surfacing should be located outside of the root protection areas of retained trees. In certain situations, engineered solutions are available to allow construction within the root protection areas. Further input from an arboriculturalist should be sought regarding their site-specific viability before these methods are relied upon.

1.3.4 Over-shading of gardens and dwellings for prolonged periods, nuisance caused by leaf/fruit drop or honeydew drip (particularly onto footpaths, parking areas or roof guttering) and an over-bearing presence of large trees can result in significant pressure from future residents to carry out harsh remedial pruning works or to remove trees post-development. All of these factors should be considered at the design stage. To avoid significant post development pressure on the TPO tree belt, it is recommended that a minimum buffer of 20m be left between houses and the trees, and consideration given to over-shading of gardens, particularly on

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the southern boundary.

1.3.5 Allowance should be made for future canopy growth of both existing and newly planted trees. Trees growing in areas of limited space may require regular future pruning works. The suitability of different species for regular crown reductions, the effect on their amenity value and the cost of future tree works should be considered.

1.3.6 The final design should show service locations and their routing. New utilities should be located outside of the trees root protection areas where they are underground and outside of the anticipated area of mature crown spread where above ground. If this is not possible, recommendations outlined in NJUG Volume 4 'Guidelines for the planning, installation and maintenance of utilities in proximity to trees' should be followed. Advice should also be sought from the project arboriculturalist.

1.3.7 Where tree removal is necessary to facilitate the wider benefits associated with development, a tree replacement strategy could be implemented to mitigate tree loss. If further tree planting does occur, consideration should be given to species selection (in relation to form and potential size) and planting locations to ensure their successful integration into the new development.

Affordable Housing Statement.

1.3.8 National and local policy require that provision be made in housing developments of this scale for the inclusion of appropriate provision of affordable housing. This is proposed in the report in a manner and quantity (30%) wholly consistent with

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current and emerging policies of the Local Planning Authority.

1.3.9 New Legislation in the form of the Housing and Planning Act 2016 signals some possible changes to the definition of affordable housing and the potential means of meeting the need. As the detailed legislation which will give effect to the new Act is anticipated during the life of the application it will be prudent to keep a weather eye on these changes in approaching affordable housing provision.

Bat and Badger Report

1.3.10 Phlorum was commissioned to carry out a series of bat and badger surveys across land at Church Lane in Climping, West Sussex. Potentially suitable habitat to support these species groups was identified during the Preliminary Ecological Appraisal and further assessments are required in order to ascertain whether these species groups could pose a constraint to the works. By way of context the Bat and Badger report notes that the current proposals are for a residential development to include amenity facilities and the provision of green space. It is understood that the woodland within the southern and western site extents will be retained and enhanced and a series of ponds will be created as part of the proposed landscaping design.

1.3.11 The main findings of the surveys are as follows:

- A series of bat surveys were undertaken at the site to include an activity surveys in September 2015 and June 2016 and tree assessment in respect to bats in November 2015.
- The tree assessment identified a total of 62 trees that were considered to have moderate or high value to roosting bats. The majority of these were located within the woodland boundaries around the southern and western site extents.

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- No bat roosts were identified within any of the trees during the activity survey. Overall there was a moderate level of foraging activity at the site and at the peak of activity, at least three species were recorded. Species included soprano pipistrelle (Pipistrellus pygmaeus) common pipistrelle (Pipistrellus pipistrellus) and noctule (Nyctalus noctula).
- Activity was concentrated along the southern and western site boundaries within the woodland areas with considerably less activity recorded throughout the remainder of the site.
- Although no roosts were identified in any of the on-site trees during the activity survey, suitable features on the trees continue to have potential for use as bat roosts at different times of the year.
- Overall, features identified on the trees may be used by small numbers of bats as temporary overnight roosts during the active period, or by individual males during the mating season. Larger cavities may also provide more stable conditions for groups of hibernating bats.
- Based on the current design proposals no trees identified as having bat roost potential will require removal to facilitate the development. If design proposals change further surveys in respect of trees may be required.
- If any trees identified as having potential to support a bat roost subsequently require removal or associated tree works, these should be subject to a climbed inspection.
- If bats are subsequently found to be roosting within the trees and where felling is unavoidable, it may be necessary to obtain a European Protected Species Mitigation (EPSM) Licence before the works can proceed and to complete any necessary mitigation.

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- Due to the level of bat foraging activity at the site as a whole, measures to mitigate the impact on lighting in respect to the development should be devised and a lighting scheme that is sympathetic to bats should be incorporated into the final design. This will serve to limit disturbance to bat foraging patterns post works and ensure the on-going suitability of potential roosts within the retained boundary trees post works.
- A badger survey was also undertaken and covered all land within the survey boundary and all land accessible within a 30m buffer of the site. No setts or secondary signs of badger were identified within the site or surrounding 30m at the time of the survey.
- Based on the results of the survey, badgers do not pose a constraint to works. However due to the potential presence of badgers in the wider landscape, a series of mitigation measures are recommended in order to safeguard individuals passing through the site during the proposed works.
- Details of mitigation and enhancement measures for the site are provided in the recommendations section of the full report.

Design and Access Statement

1.3.12 The Design and Access Statement has sought to demonstrate how the scheme accords with relevant national and local planning policy and design best practice in relation to outline planning applications.

1.3.13 By following the set of principles established within the Design and Access Statement, the detailed scheme to follow at Reserved Matters stage would blend a variety of dwelling types and community uses with good permeability, strong links to public transport, safe and secure access to public open space and a good variety of built form which is reflective and complimentary to the existing built form within Clymping.

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1.3.14 These elements will ensure the creation of a pleasant environment to live developing a central heart to Clymping.

Ecological Survey

1.3.15 A Preliminary Ecological Appraisal was carried out at land at Church Lane in Climping, West Sussex, on the 03rd August 2015, in order to determine whether any ecological constraints could affect the proposed works for the site. An additional site visit was undertaken on 10th May 2016 to assess habitats on the frontage of the A259.

1.3.16 It is understood that current proposals are for a residential development to include the provision of green space. A new junction will also be required between the A259 and Church Lane. It is understood the woodland within the southern and western site extents will be retained with the exception of a discrete area within the eastern site extent to make way for the new junction. Ponds will also be created as part of the proposed landscaping design.

1.3.17 The main findings of the survey are as follows:

- The survey area was dominated by an arable field together with woodland, areas of scrub, grassland, scattered trees, ruderal vegetation and a hedgerow.
- The site is not subject to any statutory or non-statutory designations. The closest statutory designated site is Littlehampton Golf Course Site of Nature Conservation Interest (SNCI) located approximately 1km to the south.
- Habitats within the site were assessed as being of value to wildlife with the local vicinity with potential to support populations of badgers, breeding birds, reptiles, bats and great crested newts.

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- Following the initial habitat assessment, further protected surveys are recommended in respect to bats, great crested newts and badgers in order to determine if and how these species are using the site and in order to devise appropriate mitigation.
- Further surveys for breeding birds and reptiles are not considered necessary. Instead a precautionary approach to works is recommended to safeguard these species groups.
- Details regarding the protected species surveys together with a series of mitigation measures in respect to other protected species groups together with enhancement options for the site are provided in the recommendations section of the report.

Great Crested Newt Survey

1.3.18 Phlorum was commissioned by Parker Dann to carry out great crested newt (Triturus cristatus) surveys at water bodies within the site at Church Lane in Climping, West Sussex. It is understood that current proposals are for a residential development to include the provision of green space. It is understood the woodland within the southern and western site extents will be retained and ponds will be created as part of the proposed landscaping design. Surveys were required in order to ascertain whether great crested newts could pose a constraint to the works. The pond surveys were carried out in April, May and June 2016 by surveyors licensed by Natural England.

1.3.19 The main findings of the survey are as follows:

- The site covers an approximate area of 21 hectares (ha) although the proposed development is concentrated within the southern extent of the site.
- No ponds were present on site and a total of five ponds and a ditch were included in the survey within a 500m radius.

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- The pond locations and reference numbers are represented in the Survey Map in Appendix A.
- A Habitat Suitability Index Assessment was carried out for each of the surveyed ponds. Ponds 3, 4, 5, and 6 received a score of Poor, Pond 7 received a score of Below Average, Pond 1 received a score of Average and Pond 2 received a score of Good.
- No great crested newts of any life stage were found in Ponds 3, 4, 5, 6, or 7 and Ditch 1.
- A small population of great crested newts were in found in Ponds 1 and 2 based on current Natural England guidelines (English Nature 2001). No evidence to show that the newts were breeding within these ponds were found during the survey.
- Smooth newt was also present in Ponds 1, 3 and 7 and common frog was recorded off-site in Pond 3.
- Great crested newts receive protection under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010. Under current legislation both the individual and habitats they use for shelter and breeding are protected.
- Due to the absence of great crested newts to the north, east and west of the site, together with the general unsuitability of the habitats within the development footprint (i.e. arable field) and the presence of a busy road (A259) between the site and Ponds 1 and 2. the potential for great crested newts to be utilising on-site terrestrial habitat for commuting and hibernating is considered to be low. Instead it is considered more likely that individuals in the landscape will be using terrestrial habitats connecting ponds to the south.
- Based on these factors, a European Protected Species Mitigation Licence in respect to great crested newts is not required, on the basis that a precautionary approach to the works will be implemented in order to minimise any potential impacts. Further detail is provided in the Mitigation Strategy Section of the report.

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Historic Environment Desk based Assessment

1.3.20 This Desk-Based Assessment has been prepared for land at Church Lane, Climping, West Sussex. The Site comprises a large field located between Church Lane and Crookthorn Lane, located near to the site of the deserted medieval village of Climping, a Scheduled Monument. The development plan proposes a mixed use residential scheme.

1.3.21 The assessment has concluded that the archaeological potential at the Site is as follows:

- Prehistoric - Medium;
- Roman – Low-Medium;
- Anglo-Saxon – Low-Medium;
- Medieval (related to DMV) - Low-Medium;
- Medieval (related to agricultural activity) – Medium-High;
- Post-medieval – Medium-High;
- Post-medieval – building remains are likely to be extant in two discreet areas of the Site.

1.3.22 At the time of preparing the heritage assessment detailed design plans were not available however this report assumes that the development has the potential to cause a negative impact upon any archaeological remains, should they be present, across all areas of the site.

1.3.23 A provisional programme of mitigation measures has been suggested to establish the presence or absence of any archaeological remains should they be present at the Site.

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1.3.24 Thirteen Grade II and one Grade 1 Listed Building and a Scheduled Monument have been identified within the 1km Study Area. This report concludes that it is unlikely that there will be any setting issues relating to these heritage assets arising from the development at the Site.

Landscape and Visual Impact Assessment

1.3.25 The LVIA contains Table 1 (at page 33 of the main LVIA report) which sets out an overall summary of the Assessment of the site, and this is reproduced below overleaf.

1.3.26 In the context of the table the LVIA concludes that on balance the proposed scheme will provide benefit in terms of landscape resource enhancement and an opportunity to secure, in the long term, future management and retention of the existing woodland on the site boundaries.

1.3.27 Compared with the existing five, high density housing developments already permitted along Horsemere Green Lane, the relationship between open space and housing development is more cellular in form and a less regimented grid pattern. The predominance of open space, linked green spaces and the provision of community facilities will provide elements that are presently lacking within the village.

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SUMMARY TABLE 1

Landscape Impacts	Construction Phase	Yr 1 Following Construction Phase	Yr 5 of Establishment	Year 10 to 15 Following Establishment*
Landscape Resource	----------	----------	slight positive	moderate positive
Visual Impacts				
Public Rights of Way:				
1. Church Road	Moderate negative	Moderate negative	Slight negative	----------
2. A259 Crookthorn Lane	----------	----------	----------	SlightPositive
A259 Crookthorn Lane (Roundabout Area)	Moderate negative	Moderate negative	Slight negative	----------
3. Yapton Road	----------	----------	----------	SlightPositive
4. A259 Littlehampton By-pass	----------	----------	----------	----------
Footpaths:				
No 168	Slightnegative	Slightnegative	----------	SlightPositive
No 169	Moderate negative	Moderate negative	Moderate negative	Slightnegative
Residential Properties:				
Group 1	Slightnegative	Slightnegative	----------	SlightPositive
Group 2	Moderate negative	Moderate negative	Slightnegative	----------
Group 2 Remaining Properties	Slightnegative	Slightnegative	----------	SlightPositive
Group 3	Slightnegative	Slightnegative	----------	SlightPositive
Group 4	Slightnegative	Slightnegative	----------	SlightPositive
Group 5	Substantial negative	Substantial negative	Moderate negative	Moderate negative
Field Place	Slightnegative	Slightnegative	----------	SlightPositive
Benjamin Grey Drive	----------	----------	----------	----------
Public Open Recreation Space	Slightnegative	Slightnegative	----------	SlightPositive

---------- no notable positive or adverse impact

*Subject to long term LEMP being implemented

Noise Assessment

1.3.28 Noise affecting the proposed development from road traffic, aircraft and other noise sources has been measured and the noise impact of the development has been calculated.

1.3.29 The results of the noise survey undertaken across the site show mean free-field

daytime and night-time ambient noise levels at LT1, LT2 and LT3 of 55, 59 and 60 dB LAeq,16hr and 47, 52 and 51 dB LAeq,8hr respectively which would put the propose residential parts of the site in NEC B. For NEC B the Arun states "Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise"

1.3.30 These mean ambient noise levels would be higher than the levels expected once the properties and associated fencing is erected. However, as detailed plans are not available at this stage, the measured noise levels have been assumed as representative of noise levels following the development's construction.

1.3.31 The predicted daytime maximum outdoor amenity area free-field LAeq,T noise level of 50 dB meets the WHO guideline noise level for moderate annoyance of 50 dB(A), recommended for private outdoor areas with mitigation in the form of close board fences in place.

1.3.32 Internal noise levels have been predicted using BS 8233 typical Rw sound insulation values for a façade construction with double glazed windows. With windows closed, all properties are predicted to achieve BS 8233 internal guideline noise levels during both daytime and night-time periods. However, with windows partially open to allow for natural air ventilation, the guideline levels are exceeded by a significant margin across the majority of the development site.

1.3.33 Alternative forms of ventilation to opening a window are therefore required for the site's development proposals, such as trickle vents, mechanical ventilation or

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whole house ventilation.

1.3.34 For the control of road traffic LAmax,F inside bedrooms at night, a minimum composite sound reduction of 30 dB Rw is required to mitigate current LAmax,F levels in order to achieve the WHO's 45 dB LAmax,F guideline noise level.

1.3.35 With these design and mitigation measures in place the internal noise levels should not exceed the internal ambient noise level guidelines in BS8233 and WHO guidance.

1.3.36 It is recommended that detailed noise calculations using the procedure set out in BS 8233 and CRTN are undertaken to guide the selection of specific building elements and the requirement for close board gardens fences, during the detailed design stage of the project. It is also recommended that noise measurements are carried out after construction to verify the overall sound insulation performance of the dwellings.

1.3.37 It is also recommended that a planning condition is set to require the BS 4142 assessment of potential impacts from plant or activities associated with the offices and village hall and detailed BS8233 calculations of the proposed dwellings to ensure good internal acoustic conditions.

1.3.38 Calculations of existing and future traffic noise levels have shown a negligible change in noise levels due to traffic movements associated with the development properties. If the alignment of the A259 is amended this may trigger the requirement for the highways authority to conduct an assessment into any eligibility under the Noise Insulation Regulations [15].

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1.3.39 Based on the information and assessments contained within this report there is no apparent conflict on matters of noise between proposed development and the policy requirements of the Arun District Local Plan, NPPF and NPSE for either the noise impact on existing noise sensitive receptors or new noise sensitive receptors introduced by the development.

Planning Statement

1.3.40 The Planning Statement provides the planning background to the proposals. It explains the Mulgrave Estate's long standing interest in the settlement of Clymping and describes the land and its context. A summary of the proposals identified in the Development Concept Masterplan prepared by JRP is presented. The key task of the Planning Statement is to assess the proposed development against the issues which law and planning practice require.

1.3.41 Having regard to an analysis of the site and surroundings, and in the context of the Design and Access Statement the following design principles for the development of the land have been prepared;

- Maintain and strengthen the existing mature trees and hedges that form the southern, eastern and western boundaries of the land as part of its development to integrate the development of the land into the existing landscape.
- Avoid development of an excessive height to minimise impact on the surrounding countryside.

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- Provide a sustainable development on the edge of Clymping, introducing new facilities for the settlement within the development and building on the existing and approved public transport and safe pedestrian/cycle connections to neighbouring settlements - thus minimising the need for car journeys and promoting a healthy, active lifestyle.
- Provide significant green spaces within the land for recreation and amenity, introducing appropriate planting as key features within these areas.
- Provide a distinctive, high quality development in terms of building, urban form and spaces, which draws on the established design approach of the area.
- Create a safe and attractive place which fosters a sense of community, taking into account (amongst other measures) guidance from the Flood Risk Assessment of the proposals.

1.3.42 Planning applications are required to be determined in accordance with the provisions of the development plan unless other material considerations determine otherwise. Government policy becomes part of this equation under the heading of 'other material considerations'.

1.3.43 Of significance in this connection is paragraph 49 of the National Planning Policy Framework (NPPF) which indicates that if planning authorities are unable to demonstrate a five year supply of land then relevant policies for the supply of housing should not be considered up to date. Paragraph 14 of the NPPF indicates that where a plan is not up to date planning permission should be granted unless there are adverse impacts which would 'significantly and demonstrably' outweigh the benefits, and that there is no conflict with specific policies of the NPPF which restrict the development.

1.3.44 A requirement of paragraph 215 of the NPPF has been highlighted by the Courts

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(Gladman Developments v. Daventry District Council [2016] EWCA Civ 1146) and from this it is notable that the starting point in evaluating the development plan must be the extent to which extant policies align or otherwise with the NPPF.

1.3.45 The Courts have considered the meaning of 'relevant policies' and have determined that any policy which restricts the supply of housing (including, where applicable, Green Belt) is rendered out of date by the lack of supply of housing land. (Suffolk Coastal v Hopkins and SSCLG AND Richardson Estates v Cheshire East BC and SSCLG [2016] EWCA Civ 168). The findings of the Court of Appeal suggest that when the requirement of paragraph 14 is engaged then those policies which are set to one side have utility in measuring the overall balance of the equation, and to that extent need to be weighed, but they do not have determining force without first weighing their effect.

1.3.46 The first point to note in the consideration of this application is the fact that there are no matters relating to the list of specific policies set out in footnote 9 of the NPPF. The blanket restrictions implied by such matters do not therefore subsist in the instant case.

1.3.47 In this case the consideration of the material issue indicates that all issues save two have, it is submitted, no adverse impact, and in this context it is appropriate to focus in balancing the issues only on the two where there is adverse impact namely the effect on policies for protection of the open countryside and those for the protection of higher grade agricultural land.

1.3.48 On countryside protection the land is already extremely well screened from more

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distant views, and such screening can, as is illustrated by the indicative master plan, be supplemented to render effective screening of the development from external public views. On the countryside protection issue it is submitted that the weight to be attached to this is, relative to many areas of open countryside in the locality, of a low order of weight.

1.3.49 On protection of agricultural land quality both the extant development plan policy and that in the emerging Local Plan are termed in a manner which acknowledges that there can be more pressing needs which outweigh the sustenance of the agricultural land.

1.3.50 The need for substantial new residential development has been established by the Inspector conducting the Examination into the Local Plan. The Local Plan Examination has been suspended to enable the Council to draw up modifications to address this substantial increase in the Objectively Assessed Need. For the lesser amount of development tabled originally in the submitted plan it has been demonstrated necessary to consume high grade agricultural land after the necessary balancing exercise undertaken in connection with the local plan. It is therefore axiomatic that the higher needs indicated by the Inspector will have to be delivered using higher quality agricultural land. In this context the reader is invited to attach less weight to the agricultural land policies.

1.3.51 In a similar vein the emerging Local Plan work has demonstrated the necessity of promoting open countryside for development. Again to meet the upward revisions countenanced by the Local Plan Inspector it is axiomatic that open countryside will need to be consumed to meet the Objectively Assessed Need.

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1.3.52 The test in paragraph 14 of the NPPF is whether or not the adverse effect of a proposed development significantly and demonstrably outweigh the benefits of a proposed development. Given the axioms referred to above it is considered that the adverse impacts do not pass the test of paragraph 14, as 'significantly' would only be achieved where there was a real possibility that other land of lesser countryside and agricultural land quality impact might be available elsewhere.

1.3.53 In these circumstances the decision indicated by Government policy is that planning permission should be granted. The Council are invited to the same view and join with us in agreeing conditions and terms of a S106 agreement to deliver the required essential housing.

Surface Water Drainage Report

1.3.54 Post development there will be an increase of impermeable surfaces on the site, based on calculations derived from the masterplan the proposed development's impermeable footprint will be approximately 4.73ha.

1.3.55 Based on the 1:100 year with an allowance for climate change 6 hour storm event the proposed development will be required to provide 3143m^3 of storage to mitigate against the increase in hard surface. The proposed maximum offsite flow rates will be limited to the existing site QBar rate at 76.6l/s.

1.3.56 Initial calculations included in this report show that the required storage volume can be accommodated in the areas designated for water storage on the proposed

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masterplan.

1.3.57 The site is located on largely permeable superficial and bedrock geology and as such infiltration components are suitable for the site, given that appropriate treatment can be provided to address the potential groundwater contamination concerns. For the purposes of this report as no infiltration testing is available and the local area is drain to watercourses a scheme based on outfall to a local watercourse has been considered.

1.3.58 The proposed SuDS treatment train of bio-retention and filter trenches followed by ponds will offer adequate water quality treatment prior to outfall. This train can be augmented by proprietary items for removal of sediments and further oil removal as necessary.

Foul Water Drainage Report

1.3.59 The study by Ambiental notes that there is insufficient present capacity in the connection to the treatment works and this must be addressed in pursuing the development. However two remedies are available, the first being a requisition to secure the capacity using the Water Acts. Secondly a private treatment works may be possible, but the suitability of the site requires further investigation before this option can be firmly tabled.

Flood Risk Report

1.3.60 With reference to the NPPF and the Environment Agency (EA) standing advice on development and flood risk, as well as the low detail, national-scale flood mapping created on behalf of the EA, the proposed site is located within Flood Zone 1 (Low

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Risk) and is considered to be predominantly a 'More Vulnerable' (residential) development under the NPPF.

1.3.61 The NPPF requires any planning application for new or re-development within a Flood Zone 1, over 1Ha in size to be accompanied by a FRA to demonstrate that the development can be achieved in a sustainable manner, with an overall reduction of flood risk to the site and surrounding area.

1.3.62 The present day impact to the development site from tidal and sewer flooding is deemed to be relatively low. The impact to the development from groundwater and surface water flooding is deemed to be potentially moderate.

1.3.63 The 2115 impact of tidal flooding to the development is deemed to be moderately high for those areas within the modelled 1:200 year with an allowance for climate change flood extent, however the developer has taken a sequential approach to the development and located as many units and structures outside of this flood extent. As such, based on the masterplan (drawing number P14 4899 01 REV C), a total of 4 structures are located within the modelled flood extent; 3 residential structures and 1 commercial structure.

1.3.64 A surface water drainage strategy report has been completed for the site based on the masterplan to provide an understanding of the natural surface water flow directions across the site, the volume of storage potentially required post development and the suitable SuDS components based on the development type and site location. A foul water strategy has also been undertaken separately.

1.3.65 It is noteworthy that:-

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- The site is located within the present day Flood Zone 1, as of October 2016;
- A surface water drainage strategy assessment has been completed, and demonstrates the volume of water generated by development can be mitigated on-site (See Ambiental SWDS 2322);
- A foul water drainage scheme has been undertaken, and details of this are included within Ambiental Report 2495;
- Ground floor thresholds and internal finished floor levels shall be raised a minimum of 300mm above the general ground level for all structures on site to account for potential surface water flow in the future;
- The potential flood risk from tidal flooding in the future (2115) has been analysed and various flood management and mitigation methods have been proposed for those structures affected, and;
- A flood warning and evacuation plan has been set out based on the existing masterplan for those site users affected by the 1:200 year flood event 2115;

1.3.66 In the context of the above and following the guidelines contained within NPPF, the proposed development type is considered to be suitable assuming appropriate mitigation (including adequate warning and evacuation procedures) can be maintained for its lifetime.

Traffic and Transport Report

1.3.67 The development proposals were the subject of a pre-application consultation with West Sussex County Council as Highway Authority. The County Council provided helpful advice which has been taken into account in the submitted planning application

1.3.68 The site is in a sustainable location, being within a short walk of the local primary school, within easy cycling distance of three railway stations, adjacent to a

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number of cycling facilities, and in close proximity to the 20 minute frequency bus service connecting to the nearest towns. The package of transport infrastructure measures included in the proposals will provide new bus stops on A259 located so that all of the proposed housing development will be within 400m of those bus stops.

1.3.69 Analysis of generated traffic volumes and its distribution/assignment on the local network shows that the majority of traffic to and from the site will use A259, either to the east or west. Although this is a heavily trafficked route, the impact of additional traffic from the development will be low in percentage terms.

1.3.70 The capacity of five junctions has been assessed, in agreement with West Sussex County Council, having regard to their methodology which requires that all junctions where there will be increases of more than 30 vehicles per hour during peak hours to be assessed. These junctions are:

- A259/B2132 staggered crossroads
- A259/B2233 Yapton Road T-junction
- A259/Church Lane Roundabout
- A259/Bridge Road Roundabout
- Yapton Road/Horsemere Green Lane T-junction

1.3.71 Analysis shows that all of these junctions, with the exception of the Church Lane Roundabout, will work with substantial reserves of spare capacity at a design year of 2026 allowing for background growth in base traffic flows due to committed developments elsewhere in the district, growth due to national economic factors, plus additional traffic generated by the proposed development. The analysis

shows that the proposed development has only a very marginal effect on the operations of these junctions.

1.3.72 The Church Lane Roundabout is currently severely overloaded, during both morning and evening peak hours, with extensive queues and delays on the A259 approaches. It is not possible to improve the capacity of the existing roundabout to a sufficient extent within the available land ownership, including the application site. Accordingly, the development proposals incorporate a new, larger, 3-arm roundabout located some 100m west of the existing junction, with Church Lane realigned through the site to the new roundabout. The new junction and the realigned section of Church Lane are designed in accordance with current standards.

1.3.73 Analysis shows that the new roundabout will operate with substantial reserves of spare capacity at the design year, with minimal queues and delays, thereby resolving an identified existing capacity constraint on the A259. The extent of this spare capacity will "future proof" the design in the event that other draft local plan housing developments increase traffic along the A259 and/or Church Lane over and above the existing commitments.

1.3.74 The transport infrastructure improvements proposed include a number of measures to encourage public transport, cycling, and walking and these are:

- New bus stops on A259 just west of the new roundabout which bring the 20 minute frequency bus service within 400m of all of the new dwellings

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- The bypassed length of Church Lane will be converted to a cycle and pedestrian route with landscaped verges, forming part of National Cycle Route 2, which will then run through the northern part of the proposed development.
- A shared cycle/pedestrian route along the northern side of A259 throughout the new roundabout works and tying back into the existing shared route which runs through to Littlehampton. The cycle and pedestrian facilities will have direct links into the proposed development.
- New pedestrian crossing refuge islands on A259 at the Crookthorne Lane junction and at the new bus stops.
- A residential Travel Plan to encourage the use of more sustainable modes

1.3.75 Analysis of personal injury accidents over the last 5 years shows that there have been 10 accidents at the existing Church Lane roundabout, with no particular pattern apart from the fact that four of those involved pedal cycles. The proposed new, larger roundabout, constructed to current design standards, with substantial spare capacity and with off-carriageway cycle facilities is expected to significantly reduce the number of accidents compared with those which have occurred over the last 5 years.

1.3.76 Examination of personal injury accidents at the other junctions around the site reveals no particular patterns and these accidents are therefore unlikely to be due to deficiencies in the highway layout. The small increase in traffic due to the proposed development is unlikely to increase the number of such accidents. In particular, there have been 2 fatal and 1 serious accidents at the Yapton Road junction with A259 but these are all random in nature with no pattern and there is evidence that all are the result of significant driver errors. Accordingly, it is not possible to identify practical remedial measures that might have prevented any of

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these accidents.

1.3.77 Overall, the development proposals are in a sustainable location and the substantial package of transport infrastructure improvements which is proposed to mitigate the effects of the development includes a new roundabout junction on the A259. This will resolve existing traffic congestion as well as providing for background growth of traffic and that generated by the proposed development.

1.3.78 Not only is there an absence of material adverse residual impacts as a result of the proposals, but the package of infrastructure works will provide significant benefits to all road users in terms of increased highway capacity, a likely reduction in accidents, and enhanced cycle and pedestrian facilities. In the context of paragraph 32 of the NPPF, the development is therefore considered acceptable from the transport perspective, because there are no severe residual impacts.

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