# REPORT UPDATE

## Application No: CM/1/17/OUT

## Reason for the Update / Changes

Reason for Update/Changes:

Page 195 - Relevant site history:

Add 'PE/00451/16 Screening opinion for 'development comprising of up to 300 dwellings, open space, community facilities with alterations to highway layout' issued 29th July 2016 concluding that proposal was not EIA development.'

Officer Comment:

To clarify history of the site.

Page 199 - Additional representations received:

25 additional email representations have been received following publication of the Report, sent directly to Members of the Planning Committee.

Officer Comment:

The points raised are re-iterating issues that are already set out in the representations section of the Report and addressed in the Report.

Page 205 - Updated Consultee responses:

ADC Greenspace:
- Requirement for new housing to contribute to new outdoor sports pitch provision to be provided in the form of two new outdoor pitches suitable for football or rugby at the new site in Ford (commuted sum of £42,187.50).

ADC Pools and Halls
- Requirement for new housing to contribute to provision of additional indoor sport, art and cultural facilities at a level at least commensurate with the additional population generated by the development. Based on the key findings within the ADC Indoor Sports and Leisure Facilities Strategy 2016 there is need for additional capacity and facilities for swimming, sports and health and fitness. Contributions recommended towards health and fitness stations and gym changing facilities in Littlehampton, swimming pool changing facility improvements and a new 3G pitch.

Officer Comment:

The updated contribution details for leisure and sports pitches are included in the S106 obligations table.

Page 212 and Page 224:

Replace 'There are no specific policies in the Framework that indicate that this development should be restricted' with 'Some policies of the Framework are cast in terms which indicate that in certain circumstances planning permission should be restricted. These, in this case, relate

principally to flooding, agricultural land, the natural environment, noise and designated heritage assets. Having regard to the tests set out in the NPPF in relation to these issues, and in the context of the content of this report, it is considered that the circumstances are such that none of these issues amount to a reason for withholding planning permission either because the matter can be controlled by suitable conditions, content of the Section 106 agreement or because the public benefit outweighs the harm in respect of the issue at hand.'

Officer comment: to clarify the Report in relation to paragraph 14 of the NPPF ('policies which indicate that development should be restricted'). The specific restrictive policies within the NPPF are addressed in the respective 'technical matters' section of the Report and this is now reflected in the amended conclusions.

Page 224: Amendment to conclusion

Add at end of last paragraph 'It should be noted that the Secretary of State has requested that the decision is not issued until they have concluded on whether or not the application will be called-in for determination by the Secretary of State'.

Amendments to Conditions:

Condition 3: Delete 'P14 4899-01 Rev F - Feasibility Illustrative Masterplan' and 'P14 4899 03 - Acoustic Barrier to A259 Illustrative Proposals'

Condition 4: after 'in substantial accordance with the Illustrative Masterplan P14 4899-01 Rev F...' add '...P14 4899 03 - Acoustic Barrier to A259 Illustrative Proposals'

Condition 6: after 'shall be submitted in writing to the Local Planning Authority and...' add 'such plan as is agreed by the Local Planning Authority shall be...'

Condition 23: Insert 'During the construction phase...' at the start of the condition.

Officer comment: Clarification of condition wording to ensure enforceability

**Notes: Changes to recommendations, conditions and / or reasons for refusal will always be reflected in the recommendation section of the attached Officer's Report/Recommendation.**

**CM/1/17/OUT**

**Recommendation Report for Outline Consent**

**REF NO:** **CM/1/17/OUT**

**LOCATION:** Land West of Church Lane &
South of Horsemere Green Lane
Climping

**PROPOSAL:** Outline application for the erection of up to 300 dwellings & ancillary development comprising open space, a building within use class D1 (Non-Residential Institutions) of up to 875 square metres net, a building for A1 (Shops) use having a floor area of up to 530 sq. metres net, together with open space & ancillary works, including car parking & drainage arrangements, with appearance, landscaping, layout & scale wholly reserved for subsequent approval. The access detail, showing the points of access to the development, & indicated on Bellamy Roberts drawings numbered 4724/004 & 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. This application is a Departure from the Development Plan & affects the setting of Listed Buildings.

**SITE AND SURROUNDINGS**

DESCRIPTION OF APPLICATION

The proposal is for outline planning permission for up to 300 dwellings and ancillary development comprising:
- open space
- a building within use class D1 of up to 875 sqm net
- a building for A1 use with a floorspace of up to 530 sqm net

The access detail, showing the points of access to the development is not to be reserved. This includes a proposed new roundabout on the A259/ Church Lane junction and access to the north of the site from Horsemere Green Lane.

Appearance, landscaping, layout and scale are reserved for subsequent approval.

The proposal is for residential development of up to 300 dwellings with a development area of 10ha. An illustrative layout accompanies the application showing how the dwellings could be accommodated on the site. The Design and Access Statement anticipates that more dense development would be clustered around the village green and site access routes. 30% affordable housing is proposed which would be

provided across the site. The frontage on Church Lane would be set back 30m+ to provide a green frontage and allow a new footway to be provided behind the existing hedge and trees.

The proposal also includes a building within use class D1 of up to 875 sqm net which would be provided alongside the housing development. This unit has potential for a village hall, doctor's surgery or pre-school nursery. A second building is proposed for a retail (A1 use) with a floorspace of up to 530 sqm net and is shown at the site entrance close to Church Lane and the A259 to serve the wider community.

A range of public open space to serve the development is proposed. This comprises a dedicated semi-natural greenspace to the western end of the site which could provide wetland, meadow and extended woodland area habitats. A village green with equipped play area and pond are illustrated in the centre of the site. A northern greenspace is also shown which connects to the existing playspace on Cropthorne Drive. Pocket greens are also proposed as more local spaces for informal recreation. Existing tree belts to the perimeter of the site are to be retained and extended, except where the new access/ roundabout is proposed.

A network of footpaths are proposed in order to provide open access across the site, connecting different parts of the village and facilities including the school to the south of the site, with improved pedestrian crossings.

The Design and Access Statement also sets out how sustainable urban drainage principles can be accommodated on the site, with wetland habitats, swales and ponds with additional storage capacity

The transport improvements associated with the development can be summarised as follows:

| | |
|---|---|
| | - The primary route into the new development is proposed to be from a new roundabout on the A259 which would then go north with a left turn into the development.<br>- The primary route would then join with Horsemere Green Lane providing an improved junction with Church Lane than the existing junction.<br>- The transport mitigation measures detailed in the Transport Assessment include new bus stops on the A259 close to the proposed new Church Lane roundabout.<br>- Cycle connectivity would be accommodated through the provision of a cycle path within the site to join with the South Coast Cycle Route (which currently passes along Church Lane/ Horsemere Green Lane). |
| SITE AREA | 27.01 hectares (gross site area)- |
| RESIDENTIAL DEVELOPMENT DENSITY | Across the whole site the density is 11 dwelllings per hectare (dph) (including the 14 ha of open space). Based on the residential areas (10 ha) the density is 30 dph. |
| TOPOGRAPHY | Predominantly flat. |
| TREES | Mature trees form the southern, western and part of the eastern boundary of the site. The trees provide a good screen for the site and separation from the surrounding roads. TPO/CM/1/04 covers the western and southern tree belts. The proposed realignment of the Church Road would require removal of some of the eastern hedgerow/ trees and the new roundabout would require removal of part of the southern tree belt. |
| BOUNDARY TREATMENT | The southern boundary consists of a woodland tree belt, adjacent to the A259. The eastern boundary, adjacent to Church Lane, also has mature trees and hedgerow becoming more sporadic towards the north eastern corner of the land. The northern boundary is formed by residential development with the exception of a section that fronts directly onto Horsemere Green Lane. |
| SITE CHARACTERISTICS | The site is flat agricultural land. |
| CHARACTER OF LOCALITY | The site lies to the south of Climping. The |

village has been extended through residential developments along sections of Horsemere Green Lane in the 1990's/ early 2000s. The village includes a church and church hall and the Rudford Industrial Estate. The settlement of Ford lies further to the north. The surrounding areas to the east, south and west consist of agricultural land except for sporadic development to the south along the A259 including Baird's Farm Shop, housing along Climping Street and St Mary's Church of England School. The Oyster Catcher Public House and Grange Holiday Lodge Park are to the west of the site across the B2233. A village hall and sports pitches are to the east of Church Lane.

**RELEVANT SITE HISTORY**

**REPRESENTATIONS**

**Representations received:**

Climping Parish Council

Climping Parish Council

Strongly object for following reasons:

- Contrary to Climping Neighbourhood Plan vision, objectives and Policies CNP 7, 8, 9, 10, 11, 12, 13, and 14. Also contrary to Arun Local Plan (2003) Policy GEN 3.
- Loss of local identity and sense of place - countryside site important part of rural setting of Climping
- Loss of countryside and agricultural land - Grade 1 and 2 agricultural land, local farming part of sense of place felt by local community, countryside should be protected for its own sake and for wildlife habitats and ecosystems.
- Loss of trees and hedgerows and natural habitat for wildlife - will severely impact on natural habitats, opinion of Sussex Wildlife Trust should be sought as protected species surveys insufficient. Trees, woodland and hedgerows are important feature in rural environment.
- Design and adverse impact on the neighbourhood - scheme shown will be visually intrusive to neighbouring properties and impact on privacy
- Detrimental to listed building - concern on setting of a Listed Building referred to in Policy CNP 13.
- Risk of Flooding - site known to flood and groundwater high, concern that proposals for surface water not sufficient. Also concerns over foul provisions.
- Sustainability and lack of services/ Infrastructure - Pressure on existing facilities - e.g. schools, GP practices.
- Detrimental impact on road network - Will add to existing congestion in Church Lane and A259. No local jobs therefore will result in out-commuting. Cumulative assessment of impacts is necessary. No provision for controlled crossing of local roads or the A259 to facilities to the south.

Middleton-on-Sea Parish Council made the following comments:

- Increase in traffic along the A259 especially with regard to Comet Corner junction - new roundabout will not deal with up to 600 additional vehicles which will pass the Comet Corner junction.
- A259 and Comet Corner junction at risk of further serious accidents with continued pressure by other housing planning applications in neighbouring parishes
- Deceleration lane at Comet Corner will help but not solve problem. Traffic lights are only solution.
- Consideration should be given to pooling S106 contributions to enable cost of traffic lights to be funded.
- Formally seeking £100,000 of S106 monies to commence pooling of contributions for traffic lights at Comet Corner or to improve facilities in Middleton and Elmer on projects awaiting funding and approval

Littlehampton Town Council made the following comments:

Objection. The development should be considered in context of other developments along the A259 Corridor and increase in traffic since Felpham by-pass opened. Proposals to improve the roundabout thought to be an improvement but surrounding network also needs to be upgraded. Application should be reviewed in context of Local Plan transport study to ensure co-ordinated approach to implementation of infrastructure.

1 representation was received in support of the proposal and raised the following points:

- Houses badly needed
- Good site near local amenities and facilities
- Site should be allocated if not already
- Site will provide a 'heart' for the village with central and accessible facilities
- Road alterations could slow down traffic whilst keeping it moving safely

1 representation raised 'no objection' and raised the following points:

- If restricted to 300 houses, may help link the various parts of Climping village
- Will improve walking opportunities and safety for pedestrians
- New roundabout may ease the flow on Ford Road and the A259 and benefit the area
- We have seen acceptable developments in Horsemere Green Lane and similar infill dwelling may be more in keeping with the village size at present

92 representations were received objecting to the proposal and raising the following issues:

Access:
- An amendment to the scheme is required in order to ensure that the scheme does not prevent future access to land to the east of Church Lane. Alternative designs have been provided for consideration.

Neighbourhood Plan and Principle:
- Site is outside the Neighbourhood Plan and contrary to NP
- Takes no account of local plans
- No consideration of local housing needs as Climping doesn't need 300 additional homes
- Shouldn't be using greenfield sites, brownfield sites first
- Site distant from main settlements and would set precedent for development in open

countryside
- No one local will purchase the houses so they will become holiday homes

General amenity:
- Will double to size of the village, overdevelopment with no benefits
- Cumulative impact will lead to coalescence with Climping and surrounding villages
- 'Planning blight' faced by properties to the north of the site which had views across the fields
- Loss of privacy

Illustrative layout:
- No emphasis on Sheltered Accommodation for over 55/60s
- Shop would not be viable
- No need for another Hall
- Should have fewer more generous properties to maintain village character
- Covenant would be needed to retain remaining green area
- Pedestrian access between existing and proposed developments should be improved
- Plans changed from early consultation on which views were favourable
- Query about gardens facing the existing gardens on the northern boundary and lack of integration between the schemes
- Loss of light to 8 Cropthorne Drive

Drainage and Flooding:
- Flooding of the Mulgrave Field not taken into account in FRA
- Flooding of Mulgrave Field led to flooding of Field Place
- Ditches need to be maintained
- Ditches along Horsemere Green Lane fill and overflow, flooding dangerous to drivers and children walking to school
- Winter water table high leading to surface water flooding and soil moisture levels is at field capacity for most of the winter - percolation test should be carried out in winter months.
- Existing drainage for surface water insufficient therefore proposed drainage will fail
- Creation of ponds to aid drainage
- Concerns about coastal flooding and ability of sea defences to prevent it in future, as well as Environment Agency strategy of 'managed retreat'.

Traffic and Highways:
- Safety concerns regarding entry and exit onto Horsemere Green Lane
- Larger roundabout not sufficient to deal with additional traffic
- Roads cannot support the development, already overloaded
- No account of effect on traffic
- Additional traffic on Horsemere Green Lane will exacerbate existing concerns with safety of exit onto Church Lane and at the Oystercatcher.
- Increase in HGV traffic using Church Lane, some linked to Grundon and Viridor facilities
- Felpham By-pass has led to increased waiting times to exit Middleton at Comet Cottage.
- A259 separates north and south of Climping - need safe crossing point for pedestrians and cyclists
- Traffic from other proposed developments needs to be considered.
- Residents 'trapped' by roads, sea and railways - Bognor Relief Road has increased traffic
- Horsemere Green Lane used as a 'rat-run', new estate may also be rat-run
- Oystercatcher Junction - impossible to turn right - therefore more people will use Horsemere Green Lane.
- Access location inadequate

- Train station has inadequate parking and no secure bike parking
- Route to station unlit and heavily trafficked so unsuitable for walking and cycling
- Cycle route will have to cross 3 lanes of traffic going south down Church Lane
- Entrance to housing estate should be directly off the roundabout
- Lack of public transport
- Roads on the estate will be narrow leading to parking on pavements which is a hazard for pedestrians
- No safe route to local school
- 5 accidents including two fatalities at Oystercatcher Junction - does not properly assess the junction and major improvements needed
- Second roundabout at end of Yapton Road and A259
- New footpath/ cycle path along Horsemere Green Lane needed to link with existing Church Lane cyclepath
- Traffic management scheme needed on Horsemere Green Lane
- Traffic backs up at Ford railway crossing
- Any accidents in the locality cause severe issues on the roads
- Additional traffic will be created if children are taken to Yapton School and there is no safe walking route to Yapton School
- YouTube video submitted showing congestion on Horsemere Green Lane and Church Lane.
- Lack of safe walking route to the A259 farm shop or the village school.

Open space and Play Provision:
- Proposal for access and useage of the playground which is on private property (footpath by Cropthorne Drive)

Infrastructure:
- Schools cannot support the development, specifically the village school.
- No space for expansion of current village school, currently a waiting list, only 2 places left at St Mary's School
- Dangerous to walk to the school at peak times, layby on Crookthorn Lane would help.
- Medical facilities cannot support the development
- Medical facilities only accessibly by car
- Yapton and Middleton surgeries fully subscribed and have had difficulties recruiting GPs.
- Littlehampton surgeries closing
- Building a surgery is good but still need to find GPs to run it
- Nearest secondary school at Littlehampton too far to walk or cycle
- Adds nothing to the community
- New car park at Ford Station for increased commuters
- No cohesive approach to transport, education or medical facilities

Landscape:
- Area will be transformed from semi-rural to urban area
- Doesn't fit with the character of the area
- Visual impact on landscape not considered
- HELAA assessment judged area as having negligible/ low capacity for development
- Strategic gap will be lost and areas coalesce

Agricultural land:
- Loss of Grade 1 and 2 prime agricultural land

Ecology:

- Loss of habitat for skylarks, starlings, house martins, woodpeckers, sparrows, robins, deer, foxes, awans and hedgehogs
- Bat habitat
- Loss of wildflowers and other fauna species
- Loss of east/west wildlife corridor along A259
- Evidence of frogs, toads and newts using the field and ponds in the area

Other:
- No economic reason for a development of this scale
- Foul sewage discharge capacity greater than Waste Water Treatment facilities can handle
- Uncertainty over foul connection
- No local employment
- More household waste will cause difficulties for WSCC
- Impact on setting of listed buildings
- Impact of Brexit on immigration unclear therefore population may not increase
- Lack of local recreational provision for young people could led to social disorder
- Site may be of historical and archaeological importance
- Loss of local farming jobs

Tourism:
- Tourism will be effected if coast road gets more busy

Noise and Air quality:
- Noise and pollution from HGVs using re-aligned road
- Predicted noise levels above the acceptable norm
- High earthen bank needed to the north of A259 to reduce noise and emissions
- Air pollution from traffic will be excessive

**Comments on Representations received:**

Comments are addressed in the Conclusions section of the Report.

**CONSULTATIONS**

Highways England
WSCC Strategic Planning
Environmental Health
Planning and Housing Strategy
Sussex Police-Community Safety
Engineering Services Manager
Engineers (Drainage)
Historic England
Environment Agency
Natural England
Surface Water Drainage Team
Listed Building Officer
Archaeology Advisor
Ecology Advisor
NHS Coastal West Sussex CCG
Conservation Officer
Parks and Landscapes
Arboriculturist
Southern Water Planning

Economic Regeneration
Mr Clavell-Bate
Sussex Police-Community Safety
Environmental Health
WSCC Strategic Planning
WSCC Strategic Planning

**Consultations responses received:**

ADC HOUSING:
Support. Agree with the figure of 90 affordable units as proposed (30%). Affordable housing should be secured through S106 agreement and not by condition as suggested by the application. Tenure proposed to be a matter for reserved matters stage but starting point of 80% rented and 20% intermediate is acceptable. Principle of pockets of affordable housing being pepper-potted within the development supported. Several fully wheelchair accessible units should be provided. Further consideration to housing need at the reserved matters stage. Recommendation that applicants refer to the latest evidence which currently supports a mix of 1, 2 and 3 bed dwellings. S106 considerations - ADC would not support capped percentage transfer values to a provider affordable housing being applied to the affordable housing dwellings.

ADC DRAINAGE:
- Surface water to be discharged to SuDS system.
- Advise that pumps should be avoided as unsustainable
- Focus should be on shallow attenuation with infiltration with landraising avoided
- Recommend application of standard conditions and standard advice on percolation tests to be undertaken in the winter period and at the location and depth of proposed structures.
- Design of SuDs or soakaways must include adequate groundwater monitoring data to determine highest winter groundwater table.

WSCC FLOOD RISK MANAGEMENT:
- Advise that majority of site at low risk from surface water flooding, suitable mitigation should be considered and existing surface water flow paths across the site should be maintained
- Moderate risk from groundwater flooding
- No reported flooding on the site. Horsemere Green Lane has experienced flooding
- Any local field boundary ditches should be maintained and highlighted on future plans
- The FRA/ Surface Water Drainage Assessment proposed that above ground attenuation would be used as primary method to restrict run off from the development. Should infiltration not be possible, this would, in principle meet the requirements of the NPPF, PPG and associated documents.
- Advice on detailed drainage designs to be finalised prior to development commencing and details of maintenance and management of SuDS to be submitted and approved, then implemented.

LOCAL HIGHWAY AUTHORITY:
No objection raised to the principle of the development, however, some modification and further information is required to assess the suitability of the proposed off-site highway improvements as follows:
- A Design Audit of the highway improvements
- Modification of the design to incorporate pedestrian/ cycle infrastructure being delivered by the County Council

- Removal of the north western pedestrian access onto Ford Lane
- Address comments made in relation to Road Safety Audit point 3.1, 3.3, 4.1 and 4.2.

Access:
New roundabout will replace the existing roundabout at the A259/Church Lane junction. A ghost right turn junction will provide site access from Church Lane, a right hand turn junction with a left only arrangement at Crookthorn Lane and pedestrian refuges at various locations to provide crossing opportunities. Further information requested in relation to the Designers Response to the Road Safety Audit.

Network Capacity Impact:
The Arun Transport Study (3) identifies that the proposed development will have capacity impact at the following junctions and the following contributions are required based on the 'high estimate' in the Arun Study:
- A27/A280 Patching Northern Roundabout - £33,000
- A259/ Church Lane - content in application Transport Assessment superseded Arun Study
- A259/ B2187 Littlehampton West - Tesco roundabout - £36,260

In addition the study identifies that the development has an impact at the following location, which has been identified for improvement on safety grounds.
- A259/B2233 (Oyster Catcher) - 24% of scheme cost (tbc)

Church Lane/ A259 Junction:
Improvements to the roundabout are a significant improvement to the junction (over and above the mitigation measures proposed in the Arun Study). Minor modelling issues raised but these would not make a material difference to the modelling outputs. Junction arrangements to be secured with an early trigger (e.g. prior to 50 occupations).

Sustainable Access:
Former Church Lane would be closed and retained as footway/cycleway. Appropriate links to internal network and crossing facilities also proposed for pedestrians and cyclists. Two new traffic islands on A259 - linked to new westbound bus stop and to facilitate pedestrian and cyclist movements via Crookthorn Lane. Scheme needs to link up with County Council cycle infrastructure along A259. Not considered that increase in pedestrian movements to the School on Crookthorn Road would constitute severe impact. New bus stops provided in the south east corner of the site. Illustrative masterplan highlights additional linkages. Recommended that the footway link to Yapton Road through the site is removed as it doesn't link with any existing footways.

Travel Plan:
No details submitted - appropriate to secure by condition.

Following modifications to the plans the LHA provided revised comments dated 18th May 2017. These raised some detailed design considerations which would be addressed at the detailed design stage and some remaining planning comments. These related to the length of the bus laybys, desire line for pedestrians crossing from the site to Crookthorn Lane, the police not being supportive of right turn bans, the location of the north/south pedestrian crossing point west of the roundabout and whether Church Lane should be retained as a pedestrian/cycle route.

The comments have been addressed by the applicant and further modified plans submitted.

Following consideration of the modifications the LHA provided additional response (dated 30th June 2017) concluding that:
- the amended plans for the access and highway works accord with their recommendation and would be subject to a S278 Agreement. The proposed arrangements should be secured via condition and obligation.
- the provision of the roundabout improvement in full by the applicant amounts to around £800,000 - £1,200,000 (excluding cost of third party land). The improvements outlined in the ADC Transport Study would have cost circa £169,000 of which the development would have been required to contribute £32,000. The proposed roundabout will enable a capacity improvement that addresses existing congestion.
- in relation to the Oyster Catcher junction there is no agreed scheme at this location but it envisaged to be a roundabout. Recommended that S106 obligation is sought that requires land under control of the applicant to be safeguarded and transferred to the County Council at such a time (at no cost) it is required for delivery of a junction improvement. To be safeguarded for the entirety of Local Plan period. Extent of land to be agreed prior to completion of S106 Agreement.
- Contributions towards the A27/A280 Patching Roundabout and A259/B2187 Junctions are not considered in line with the CIL Regulations due to the value of the works being undertaken at the A259/ Church Lane junction.

No objection subject to conditions/obligations - Construction Management Plan, Travel Plan, Access, Highway works, safeguarding land. Informative relating to S278.

HIGHWAYS ENGLAND:
Initial comments - insufficient information to base an informed position in relation to the potential impact on their road network. Detailed comments made in relation to the transport assessment work in order to ensure that the cumulative impacts on the Strategic Road Network are clear.

HIGHWAYS ENGLAND FURTHER COMMENTS:
Further to additional information being provided, Highways England confirmed that they have no objection subject to an appropriate contribution being secured towards A27 highway mitigations required by the emerging Local Plan. [Note: the Arun Transport Study does not apportion any impacts from the site to junctions on the A27].

ECONOMIC DEVELOPMENT:
No comments but ask that Developer signs the Arun Developer and Partner Charter, holds an event to encourage local suppliers to be involved in the development and produces and implements a work and skills plan.

ECOLOGY:
Recommended condition to ensure that Ecological Management and Mitigation Plan including a Schedule of Works to be submitted for approval prior to work commencing on site or at Reserved Matters. An updated habitat survey should be undertaken if more than 12 months have elapsed between the survey and the point at which any development decisions have been made at the site.

SOUTHERN WATER:
Sewer within site - exact location must be determined on site by applicant before the layout of the proposed development is finalised. Recommended buffer zones to ensure foul main protected. Condition recommended setting out measures to protect the public sewers. Results

of desk top study shows cannot accommodate needs of this application without the development providing additional local infrastructure. Proposed development would increase flows into the wastewater sewerage and surface water system and as a result increase the risk of flooding in and around the local area. Condition recommended to ensure details of means of disposing of foul and surface water disposal and implementation timetable to be submitted and approved. Recommendations in relation to SuDS. On site pumping station proposed may be acceptable provided the control mechanism and point of monitoring are agreed. No habitable rooms should be located closer than 15m to the boundary of a proposed pumping station and the pumping station layout and drainage details should comply with Sewers for Adoption Standards.

SUSSEX POLICE:
OBJECT in the absence of developer contributions towards the provision of additional infrastructure. In order to mitigate against the impact of growth Sussex Police have calculated that the 'cost' of policing new growth in the area equates to £44,772.52 to fund the future purchase of infrastructure to serve the proposed development. This is broken down as follows:
£2847.88 towards the costs of an additional officer to work in the Yapton neighbourhood policing team
£422.24 towards the cost of 1 additional support staff member to be based at Littlehampton Police Station.
£26,342.40 towards the costs of a re-provided Littlehampton Police Station
£3,699 towards the purchase of an additional vehicle for use by the Yapton Neighbourhood Policing Team
£1,470 towards the purchase of additional Mobile IT kit for officers working within the Yapton Neighbourhood Policing Team.
£8,500 for one fixed Automatic Number Plate Recognition Camera (ANPR)
£129 for radio cover/capacity
£1,362 for control room telephony

SUSSEX POLICE CRIME PREVENTION:
Broad comments provided with more in-depth comments at reserved matters stage. Advice provided on providing increased opportunities for natural surveillance, community interaction and environmental control. Advice on perimeter fence or wall heights depending on location within the site and gates to secure access to gardens. Signposting to Secured by Design Commercial Development (2015) document in relation to design and layout of commercial and public buildings.

NATURAL ENGLAND:
No objection. Based on plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites or best and most versatile land and has no objection. Comments provided in relation to Climping Beach Site of Special Scientific Interest (SSSI) - no objection. Comments on soils and land quality - proposed development falls under the Development Management Procedure Order consultation arrangements as the developed part of the site is under 20ha. Therefore not making detailed comments in relation to agricultural land quality and soils. Signposted relevant guidance. Additional standard advice provided on protected species, priority species and habitats, environmental enhancement and access and recreation.

ARCHAEOLOGY:
Agree with conclusions that unlikely that setting of nearby Scheduled deserted medieval village

would be likely to be unacceptably impacted upon by this proposal. Trial trenching should be used to determine if the settlement may have spread into the north-east part of the site and to investigate the potential of the site. Condition recommended to ensure that the site is evaluated ahead of development.

WSCC INFRASTRUCTURE:
Education: No spare primary/secondary/ further secondary schools in catchment areas have spare capacity to accommodate the children generated. Contributions requested as follows:
Formula based contribution to be spent on: new Primary facility at either Yapton or Ford, whichever strategic site is better placed to educate the pupils from the Climping development; Phase 2 of a new secondary school or expansion of the Littlehampton Academy should the new school not progress; Phase 2 of a new sixth form or expansion of The Littlehampton Academy Sixth Form should be the new school not progress.

Library: a new tier 7 facility on site or formula based contribution on a project to enhance library space with improved digital access at Littlehampton Library should the community facility either not progress or progress without space for Library facilities.

Fire and Rescue: formula based contribution towards fire stations and services serving the area - new technological equipment such as fire lances and thermal imaging cameras to serve the parish of Climping.

HISTORIC ENGLAND:
Do not object but concerns about whether the degree of harm has been adequately assessed and demonstrated. In particular:
- the impact on the setting of Climping's historic core of visible new development, increased ambient lighting and noise, and changes to the rural nature of the Church Lane approach
- the expected effect of the development on flood risk and the local hydrological regime, and consequent impacts on the preservation of Climping's historic core and buried remains within the deserted medieval village (DMV)
- whether the proposed development site contains any archaeological remains that are related, and of equivalent significance, to the DMV, and whether it will cause them any harm.

FURTHER HISTORIC ENGLAND COMMENTS:
Further assessment has been carried out and impact on heritage significance better understood. Still some gaps in assessment. Overall development's impact upon the setting of St Mary's Church, the Scheduled Monument and Climping's Historic Core does appear minimal. With mitigation impact expected to be slight within 5 years and reduced to negligible within 10-15 years. Agree with recommendations that further noise assessment carried out at detailed design stage and planting proposals refined. Recommend that the harm remaining is weighed against public benefits of the scheme in accordance with para 139 of the NPPF.

ENVIRONMENTAL HEALTH:
Objection due to noise levels (doubling of loudness and exceedance of internal noise levels when windows open). Mitigation would bring external noise levels to those acceptable for higher noise areas but in rural context, lower (moderate) level of 50db would be appropriate.

FURTHER ENVIRONMENTAL HEALTH COMMENTS:
Further information requested about proposed mitigation measures for noise (bund and fence) and impact these will have on noise levels. Would recommend a condition requiring acoustic

testing of each dwelling prior to first occupation. Following provision of additional plans showing the location of the bund and acoustic fencing and additional noise contour information, Environmental Health have no concerns with the achievability of the fence/bund combination.

GREENSPACE:
Open space:
To be provided on site appears to exceed the minimum required, although confirmation of areas of public open space being proposed required. Proposed indicative layout indicates open areas and pond areas which is good to see. Number of dwellings would trigger need for on-site LEAP and LAP with contributions towards a Multi-Use Games Area (MUGA) and NEAP as well as landscaped open space areas. Details to be approved by the LPA and detail of maintenance provision and commuted sums required.

Landscaping:
Advice given on ensuring high quality landscaping scheme. Conditions required for provision of landscaping setting out what a full landscaping scheme should include in order to maximise the biodiversity of the site.

Arboricultural:
Tree survey needs to be undertaken. Conditions to ensure tree protection fencing and protection plan. Retention of significant existing trees along the boundary edge and adjoining neighbouring land recommended.

Biodiversity:
Habitat survey must be included to be covered by conditions. Recommendations given for clearing vegetation and provision of bird and bat boxes to enhance ecological potential.

Further Greenspace comments:

Play being proposed is under-provision with just one LEAP. Queries raised in relation to the location of the LEAP on the site in relation to SUDs. SPG recommends NEAP contribution - query whether the fitness trail being proposed as a contribution to the NEAP requirement. Provision of informal LAPs good to see but further detail required on siting and whether additional provision could be made to the east of the site. Outline confirmation of maintenance responsibility required.

ARBORICULTURAL:
Comments provided on tree survey and arboricultural impact assessment submitted with the application - information acceptable. Important trees contained in southern and western woodland shelterbelts. Individual A and B grade oaks should ideally be retained. Loss of trees caused by new road layout would be mitigated by replacement tree planting proposed. Concerns about proximity of trees to rear gardens along southern boundary.

No objection subject to conditions requiring an Arboricultural Method Statement Report and Tree Protection Plan to be submitted and works carried out in accordance with the plan. Inspection of tree protection fencing on-site prior to commencement and schedule of monitoring visits. Any works within Tree Protection Fencing to be carried out in accordance with methodology.

NHS CCG:
Objection in the absence if developer contributions towards additional health infrastructure. Request funding contribution towards Avisford Park GP surgery for the infrastructure needs of managing GP consultant Health Care of £329,013. Justified on the basis that the impact of the propsed housing will fall onto the provision of healthcare at Avisford GP Surgery. Currently serves 10,500 patients and is at full capacity. The contribution would be utilised to add on additional infrastructure and associated costs in order to provide health care to new residents.

ADC POOLS AND HALLS:
Detailed response awaited. An update will be provided.

**Comments on Consultation responses:**

Comments noted

**POLICY CONTEXT**

**DEVELOPMENT PLAN POLICIES**

| | | |
|---|---|---|
| Arun District Local Plan 2003: | GEN3 | Protection of the Countryside |
| | GEN10 | Tidal Flooding and Coastal Defence |
| | GEN11 | Inland Flooding |
| | AREA16 | Ancient Monuments + Sites of National Archaeological Import |
| | AREA17 | Sites of Archaeological Interest |
| | DEV17 | Affordable Housing |
| | GEN14 | Public Transport |
| | GEN15 | Cycling and Walking |
| | GEN18 | Crime Prevention |
| | GEN2 | Built-up Area Boundary |
| | GEN20 | Provision of Public Open Space within New Development |
| | GEN28 | Trees and Woodlands |
| | GEN29 | Nature and Conservation Across the District |
| | GEN32 | Noise Pollution |
| | GEN34 | Air Pollution |
| | GEN7 | The Form of New Development |
| | GEN8 | Development and the Provision of Infrastructure |
| | GEN9 | Foul and Surface Water Drainage |
| Publication Version of the Local Plan (October 2014): | | D DM1 Aspects of Form and Design Quality |
| | | ENV DM4 Protection of Trees |
| | | ENV DM5 Development and Biodiversity |
| | | HER DM1 Listed Buildings |
| | | HER DM6 Sites of Archaeological Interest |
| | | H SP2 Affordable Housing |
| | | INF SP1 Infrastructure provision and implementation |
| | | LAN DM1 Protection of Landscape Character |

| | |
|---|---|
| | OSR DM1 Open Space, Sport and Recreation<br>QE DM1 Noise Pollution<br>QE DM3 Air Pollution<br>SO DM1 Soils<br>T DM1 Sustainable Travel and Public Rights of Way<br>T SP1 Transport and Development<br>W DM2 Flood Risk<br>W DM3 Sustainable Urban Drainage Systems<br>ECC SP2 Energy and climate change mitigation<br>SKILLS SP1 Employment and Skills<br>TEL SP1 Strategic delivery of telecommunications infrastructure |
| Clymping Neighbourhood Plan 2015 Policy CPN10 | Protection of high grade Agricultural Land |
| Clymping Neighbourhood Plan 2015 Policy CPN11 | Quality of Design |
| Clymping Neighbourhood Plan 2015 Policy CPN12 | Reducing the risk of flooding |
| Clymping Neighbourhood Plan 2015 Policy CPN14 | Traffic and the Environment |
| Clymping Neighbourhood Plan 2015 Policy CPN7 | Protection of open views |
| Clymping Neighbourhood Plan 2015 Policy CPN8 | Protection of Trees and Hedgerows |
| Clymping Neighbourhood Plan 2015 Policy CPN13 | Retain buildings or structures of character |
| Clymping Neighbourhood Plan 2015 Policy CPN9 | Protection of Natural Habitats |

**PLANNING POLICY GUIDANCE**

| | |
|---|---|
| NPPF | National Planning Policy Framework |
| NPPG | National Planning Practice Guidance |

**SUPPLEMENTARY POLICY GUIDANCE**

| | |
|---|---|
| SPD1 | Open Space & Recreation Standards |
| XXX6 | Interim Affordable Housing Policy |

**POLICY COMMENTARY**

The Development Plan consists of the Arun District Local Plan 2003, West Sussex County Council's Waste and Minerals Plans and Made Neighbourhood Development Plans.

A new local plan is in preparation is a material consideration when determining planning applications. At this stage the Arun District Local Plan 2011-2031 (Publication Version) October 2014 and supporting documents were submitted for independent examination on 30 January 2015. The Examination into the submitted plan was commenced but is currently suspended whilst Arun District Council addresses matters raised by the Inspector.

A number of Main Modifications to the Arun District Local Plan 2011-2031 (Publication Version)

October 2014 were approved by the Council on 22nd March 2017 and consultation on these is taking place 10 April 2017 to 5pm on Tuesday 30 May 2017. The Main Modifications should be read alongside the Arun District Local Plan 2011-2031 (Publication Version) October 2014 and where there are changes the Main Modification may also be material consideration to take into account.

The Neighbourhood Development Plan

Where applicable, Neighbourhood Development Plan's (more commonly known as a neighbourhood plan or NDP), once made by Arun District Council, will form part of the statutory local development plan for the relevant designated neighbourhood area and policies within them will be considered in determining planning applications. Made NDP policies will be considered alongside other development plan documents including Arun District Council's Local Plan. Whilst an NDP is under preparation it will afford little weight in the determination of planning applications. Its status will however gain more weight as a material consideration the closer it is towards it being made. Arun District Council will make reference to an NDP when it has, by the close of planning application consultation, been publicised for pre-submission consultation (Reg.14).

Made Plans in Arun District Council's Local Planning Authority Area are: Aldingbourne; Angmering; Arundel; Barnham & Eastergate; Bersted; Bognor Regis; Climping; East Preston; Felpham; Ferring; Kingston; Kingston; Littlehampton; Rustington; Walberton; Yapton. The written Ministerial Statement of 13 December 2016 confirms that relevant policies for the supply of housing in Neighbourhood Plans should not be deemed to be out of date where all of the following circumstances arise;

- The NDP has been part of the development plan for 2 years or less or the ministerial statement is less than 2 years old
- The NDP allocates sites for housing
- The Council can demonstrate a three-year supply of deliverable housing sites

Arun District Council will make reference to an NDP when it has, by the close of planning application consultation, been publicised for pre-submission consultation (Reg.14).

## DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:-

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is not considered to comply with the relevant development plan policies in that it is located outside of the defined built up area boundaries within the development plan. However, there are significant material considerations that would weigh in favour of the proposals and the policies within the development plan that relate to the supply of housing are out of date.

## OTHER MATERIAL CONSIDERATIONS

It is considered that there are other material considerations to warrant a decision otherwise than in accordance with the Development Plan and/or legislative background as detailed in the

conclusion section. These include the emerging Arun District Local Plan, National Planning Policy Framework (NPPF) and associated Guidance, the Written Ministerial Statement on Neighbourhood Plans (December 2016) and the CIL Regulations 2010 (as amended).

**CONCLUSIONS**

PRINCIPLE:

The development plan for Arun District currently comprises the Arun District Local Plan (2003) (saved policies) and the Climping Neighbourhood Plan (2015).

Arun Local Plan 2003

The policies of most relevance are saved policies GEN2 and GEN3 of the Arun Local Plan. The site is outside the built-up area boundary for Climping identified by Policy GEN2 - Built Up Area Boundary(BUAB). Outside the BUAB development will not be permitted unless it is consistent with other ALP policies. Policy GEN3 - Protection of the Countryside states that except for several categories of development, none of which relation to the application proposal, development will not be permitted outside the BUAB. As this site lies outside the BUAB it is categorised as countryside and the scheme would conflict with ALP Policies GEN 2 and GEN 3.

Climping Neighbourhood Plan 2015

The Climping Neighbourhood Plan (CNP) was made in October 2015 on the basis of the saved policies in the ALP and the draft policies in the eALP (2014).

The CNP does not have a built-up area boundary shown on a map or referred to in policies as the whole plan area is treated as countryside - to accord with the adopted Local Plan 2003 and the earlier publication version of the emerging Local Plan (2014) which did not propose the application site as a strategic allocation. The application site is therefore classified as countryside and the CNP anticipates that the countryside restrictions in the adopted Local Plan would apply to any applications. As set out above, the scheme conflicts with the ALP policies GEN 2 and GEN 3 and therefore conflicts with the intention of the CNP to protect countryside in accordance with those policies.

Emerging development plans

This includes the emerging Arun Local Plan 2011-2031 Publication Version October 2014 (eALP) as modified March 2017 ('the modified eALP').

The eALP was submitted for examination in January 2015. Following a material increase in the Objectively Assessed Need (OAN) for housing the eALP examination has been suspended to allow ADC to review potential locations for housing development. The proposed Modifications were approved by Full Council and consultation took place between 10 April - 30 May 2017.

Policy H SP1 - Housing Allocation of the modified eALP sets out the overall provision of 20,000 new homes through the Local Plan phased over the plan period to 2031. It includes reference to additional allocations for small sites being made across the District.

Policy H SP2 - Strategic Site Allocations is split into 3 sections covering different areas of the District. Policy H SP2c 'Inland Arun' allocates the application site for 'at least 300 dwellings over the plan period'. The policy includes a requirement for key design and infrastructure requirements including a new one form entry (expandable to two form) primary school and nursery places, improvements to the A259 between Climping and Littlehampton and a Community hub (with retail, commercial and community facilities, a new library facility and contributions to healthcare facilities to be provided in Ford). The 2015 version of the eALP did not include the application site as a proposed Strategic Site; it has been added in order to ensure that the additional quantum of required housing can be accommodated within the District over the Plan period.

Policy SD SP2 - Built up area boundary states that outside the BUAB apart from Strategic, Site Specific and Broad Allocations, development will not be permitted unless consistent with other plan policies. The application falls within the Strategic allocations definition and therefore the exception in the policy applies. The scheme complies with the modified eALP policies H SP1, H SP2c and SD SP2.

Planning Balance

For reasons given above, the application is not in accordance with ALP Policies GEN 2 and GEN 3. The following sets out whether there are any material consideration which indicate that the proposal should be determined other than in accordance with the development plan.

There has been an almost doubling of the OAN to 919 dpa and the current housing land supply figure is around 1.92 years. This demonstrates that there is a pressing need to identify and bring forward deliverable sites for housing and that ADC cannot demonstrate a 3 or 5 year supply of deliverable housing sites. In recognition of this, the Local Plan Sub-Committee resolved (December 2016) to invite planning applications for the first phases of sites being investigated at potential strategic allocations. Given the absence of a 5 year housing land supply, paragraph 14 of the NPPF is engaged. In accordance with paragraph 14 of the NPPF, planning permission should be granted unless (a) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole or (b) specific policies in the Framework indicate development should be restricted. As the Council cannot demonstrate a 3 year supply, the Written Ministerial Statement on Neighbourhood Panning does not apply. Paragraph 49 of the NPPF is also engaged, which states that the relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a 5-year housing land supply.

Given the significant shortfall in housing supply only limited weight can be given to the conflict with out-of-date ALP Policies GEN 2 and GEN 3 and the intention of the CNP. Policy GEN 2 is clear that the boundaries of the built up area were defined 'for the purposes of the West Sussex Structure Plan and this District Local Plan'. The built-up areas were drawn for the purposes of defining the extent of the built up areas and countryside. This was done with the background of the required number of dwellings for the plan making period being provided within the built-up areas or on allocated sites (up to 2011). Therefore this supports the position that the policies are out-of-date and can only be afforded limited weight.

The Publication Version of the eALP (2015) (on which the CNP was based) was prepared to address the OAN at the time and has been subject to major change to meet the requirements of the significantly increased OAN and therefore should be given very limited, if any, weight. The

CNP was produced based on the Publication Version of the eALP (2015) which did not include Climping as a parish which was expected to provide for a minimum allocation of housing. As such the CNP does not identify or allocate any housing land in its plan. Therefore only limited weight can be given to the conflict with the intention of the CNP to protect the countryside as the context within which the CNP was prepared has significantly changed.

Consideration needs to be given to the respective roles of Neighbourhood Plans which deal with local, non-strategic needs and Local Plans which deal with strategically assessed needs across the whole district. This approach was confirmed by the Secretary of State in the Fontwell decision (Land East of Fontwell Avenue - APP/C3810/V/16/314095) The modified eALP Policy H SP2c is seeking to address these strategically assessed needs through the identification of the application site as a Strategic Site. The modified eALP (2017) is yet to be examined and adopted and therefore limited weight can be attached to the modified eALP and the accordance of the scheme with Policy H SP2c.

In relation to the issue of prematurity, the Secretary of State decision at Fontwell concluded that little weight should be given to the potential for the application to undermine the plan making process due to the size of the site in relation to the housing requirement and that it wouldn't close off other options in terms of the spatial strategy in the modified eALP. Whilst the modifications have now been published and the modified eALP has progressed closer to adoption, it is considered that little weight should be given the to the potential for this application to undermine the plan making process.

Presumption in favour of sustainable development

Regard should also be had to the policies contained in the National Planning Policy Framework (2012) (NPPF) which are a material consideration. In the event of conflicts between policies in these plans or with Government policy, it is the most recent policy which takes precedence. With this in mind the NPPF, which was issued in March 2012, is materially relevant and should be afforded significant weight.

As set out above, the policies in the development plan are out of date and can be afforded limited weight and this means that the presumption in favour of sustainable development set out in paragraph 14 of the National Planning Policy Framework (NPPF) applies. The following considers the proposals against the presumption in favour of sustainable development.

In terms of sustainability of the site, the following facilities are available in the local area within 800m of the site:
- St Mary's Primary School
- Climping Village Hall and sports pitches
- Baird's Farm Shop
- St Mary's Church and Church Hall
- Oystercatcher Public House
- Rudford Industrial Estate

A range of employment opportunities, shops and services can be accessed within a 5-10 minute drive from the site in Littlehampton and Yapton. The nearest railway stations are at Ford which is 2.2km north and Littlehampton (2.5km south-east). Both stations offer regular services to settlements throughout West Sussex and beyond. The no 700 bus service runs along the A259

and B2233 and provides a regular reliable service that links the principal coastal settlements in West Sussex. There are bus stops on the A259 and B2233 within 5 minutes walk from the site and cycleway improvements are being carried out along the northern side of the A259 to continue the cycleway from Littlehampton westwards along the A259. The provision of a retail unit and community building on site will increase the sustainability of the site.

The proposal also needs to be viewed alongside the proposed allocation at Ford in the modified Local Plan (Policy H SP2c - 1,500 dwellings at Ford). The policy seeks provision of a new two form entry primary school, nursery places, a community hub to include new healthcare facilities to service Ford, Yapton and Climping, as well as sports pitch provision, improvements to the A259 and new employment provision. These new facilities would be between 800 and 1600m from the proposed Climping site and would enhance the sustainability of the Climping as a settlement. The potential for future improvements to facilities and services through the proposed development and future development at Ford, would mean that future generations would have access to more local services without the need to travel by bus or car.

Overall, whilst the village of Climping does currently lack healthcare facilities and has limited employment opportunities, the regular bus service would allow current and future residents to access to those opportunities and services sustainably. Education facilities, a convenience food store, public house, Church and village hall with sports pitches are all available within the village to support the community's needs and well-being. The environmental aspects of sustainable development are considered in detail in the report below, which concludes that the site, whilst resulting in the loss of high quality agricultural land, would be acceptable in terms of the historic environment and has the potential to enhance the natural environment through the enhanced tree planting and management of open spaces for wildlife.

Conclusion on matters of principle:

Overall, the principle of development on this site is contrary to the development plan, however, as the Arun Local Plan policies GEN2 and GEN3 and the intention of the CNP to protect countryside are out of date, in accordance with paragraph 49 of the NPPF, then they carry reduced weight. The material considerations set out above, including the lack of a 5 year housing land supply and the proposed allocation of the site to contribute to supply, are considered to weigh in favour of granting permission. The sustainability of the site is considered to accord with paragraph 14 of the NPPF. Therefore it is considered that significant weight in the planning balance should be given to the substantial contribution to housing and affordable housing in the district, boosting the sustainability of Climping, giving the community an additional area of public open space and community facilities, and the provision of strategic infrastructure.

There are no specific policies in the Framework that indicate that this development should be restricted. Therefore it can be concluded that the adverse impacts do not significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

TECHNICAL MATTERS

Agricultural land

The site is identified as Grade 1 (towards the west) and Grade 2 for the majority of the site to the east and representation have raised the loss of agricultural land as an issue. Grade 1 and 2 are

classified as 'best and most versatile' (BMV) land which is the most flexible, productive and efficient. The NPPF (paragraph 112) requires that the Council takes into account the economic and other benefits of this type of land. Policy CNP10 of the CNP seeks to protect high grade agricultural land and does not permit development which would result in its loss, unless there is an overriding need for the development and development on the site is demonstrated as the most sustainable option and it conforms to other national and local planning policies. As the site has been assessed through the eALP process, it is considered that this provides evidence that alternative options for the location of a strategic site have been explored and subjected to a Sustainability Appraisal process to select the most sustainable sites. The eALP Sustainability Appraisal recognised that most of the undeveloped coastal plain within the District is high grade agricultural land and that the majority of the strategic sites would have a significant negative effect on the objective of avoiding the loss of BMV land. The loss of BMV is one factor in the site selection and decision making process.

Policy SO DM1 of the modified eALP states that development will not be permitted on this type of land unless 'designated by this plan' or unless the need for the development outweighs the need to protect such land in the long term. As the modified eALP proposes allocating the site for housing, the proposal would meet the requirements of the policy once the modified eALP is adopted. Natural England has a statutory responsibility for advising local planning authorities about land quality issues but as the site is under the 20ha threshold, they have not commented in this instance. It is important to note that residential development in the District will inevitably involve the loss of best and most versatile land and that mitigation measures can be adopted, including the submission of a soil resources plan for the site to demonstrate that care will be taken to preserve the soil resource.

Overall, the loss of the agricultural land meets the 'special circumstances' set out in Policy CPN 10 of the CNP in that there is an overriding need for the development. It also accords with the modified eALP Policy SO DM1, to which a limited amount of weight can be given, but the loss needs to be weighed in the balance along with other technical matters as part of the 'weighted balance' in paragraph 14. This is set out in the overall conclusion.

Landscape

The protection of landscape character is an important consideration, although the site is not within a protected landscape or likely to impact on the setting of the South Downs National Park. Policy CPN 7 - Protection of Open Views seeks to ensure that all development is considered with regard to the need to protect the open landscape character of the countryside and beach. The Policy refers to the Climping Character Assessment being used to assess the impact of proposals.

A Landscape and Visual Impact Assessment (LVIA) has been submitted which seeks to assess the impact of the proposal on the landscape and to determine what mitigation measures are appropriate. Local concerns have been raised about how the development will have a negative impact on the rural setting of the village and in relation to coalescence with surrounding settlements.

The site lies within the South Coast Plain character area (WSCC, 2005) and more specifically in the Climping Lower Coastal Plain and has a mainly flat open landscape. The Arun Landscape Capacity Study (2017) carried out to support the allocation of the site in the modified Local Plan identified the site as having medium/ high landscape capacity and the ability to accommodate

housing development without a detrimental effect on the landscape or the separation of settlements. The Study recommended that the existing vegetation around the boundaries of the site should be retained and enhanced with supplementary tree planting to help limit the impact of housing development. The Study also recognised that the site has a semi-rural feel but the overlooking from houses to the north and the road noise reduce the tranquillity and remoteness of the site. The submitted LVIA assesses the impacts in more detail. The LVIA assesses the effects on visual amenity of road and footpath users and identified 'moderate negative' impacts which would reduce to 'slight negative' 5 years from establishment. This is due to the removal of roadside hedges and some of the woodland belt along the A259 which would open up direct views into the site from Church Lane and the A259. The impact on residential properties to the north of the site has been identified as being between 'slight negative' and 'significant negative' depending on the location of the properties. The properties which will experience 'significant negative' unmitigated visual impacts in the construction phase are on Cropthorne Drive, The Hamlet, May Close and Apple Tree Walk due to the loss of views out across open fields. The LVIA recognises that no amount of mitigation will replace the views but limited mitigation can be provided by planting of native species hedge and trees along the current property boundaries at an early stage to allow for softening of the views between existing properties and rear of the new dwellings. These details can be considered as part of the detailed design at the reserved matters stage.

Overall, whilst there will be negative impacts on visual amenity of existing residents, this would be reduced to a 'moderate negative' in the long term and the detailed design of the site will help to mitigate these impacts. The loss of boundary planting, whilst leading to increased impacts in the short term can be mitigated and enhanced in the longer term. Therefore, the proposal accords with Policy GEN7 of the Local Plan, Policy CNP7 of the Neighbourhood Plan and Policy LAN DM1 of the modified Local Plan.

Affordable housing

For all developments over 11 residential units the Council requires a minimum of 30% affordable housing on site, as set out in Policy AH SP2 of the modified Local Plan and in the Interim Affordable Housing Policy (2010). The proposal includes 30% affordable housing and indicates that the size of units to be provided would be within the range for affordable housing set out in Table 30 of the Council's Objectively Assessed Housing Needs Study 2015. The Affordable Housing Statement requests that the S106 obligation is drafted in a manner which would deliver the quantum and mix of affordable housing set out below, but have clauses which enable and regulate variation to respond to changed circumstances. The proposed provision is: 72 social rented and 18 intermediate (90 units total). The proposed provision of affordable housing is supported by the Council's Housing Manager. Therefore the proposal accords with Policy DEV17 of the Local Plan, as updated by the Interim Affordable Housing Policy and Policy AH SP2 of the modified Local Plan.

Illustrative Layout and Design

Policy H SP2 of the modified Local Plan provides a clear steer for development proposals on strategic sites in order to ensure that they provide a high quality development with a definite sense of place and permeable layout. A comprehensive Design and Access Statement (DAS) has been submitted with the application. The DAS provides a clear analysis of the site area and wider context, providing a character analysis of traditional Climping, the A259 and Horsemere Green Lane. It demonstrates how the design for the site evolved taking into account key

opportunities and constraints. Whilst earlier plans showed a lower number of dwellings, which enabled a green gap to be left adjacent to the existing properties to the north of the site, the upward revision of the Council's OAN figure meant that the number of dwellings proposed on the site was increased to 300. This necessitated the amendment to the layout to include additional dwellings in the northern section. The layout also avoids areas of flood risk and ensures that drainage attenuation basins are on the east of the site to reflect the natural flow of water.

The Masterplan addresses the following issues, which would be a matter for the detailed Reserved Matters stage but provide an indication of the ability to deliver an acceptable scheme:

Scale - The concept for the scheme is that it would be predominately two storey dwellings to reflect the surrounding area with the scope for 2.5 storey dwellings within the centre of the development and set at logical points to provide entrance features and focal points.

Appearance and Character - The detail would be for Reserved Matters stage but the DAS provides examples of the type of dwellings which would be considered appropriate together with visual impressions of how plots would be laid out. This includes blocks set back from the street, spaces between the built form to accommodate off street parking, larger spaces to provide a more rural feel, landmark buildings at the centre of the development, low density housing in some areas of the site to promote the village appearance. The DAS recognises the importance of the local character analysis and ensuring that key features prevalent in Climping are incorporated into the detailed design, including the proposed material palette. The artists impressions provided in the DAS provide an illustration of the site demonstrating the potential for a high quality scheme to be developed which respects the rural character of the area and avoids a suburban appearance. Other built form principles set out in the DAS include the identification of key frontages within the site and focal buildings. It also recognises the importance of gables being appropriately treated with windows to ensure surveillance and true dual aspect dwellings being employed at key corners. The building line along the re-aligned Church Road would be set back by a minimum of 30m which would help ensure a buffer of landscaping to the site.

Pedestrian, cycle and vehicle movement - The primary vehicular route through the development would provide a connection between Horsemere Green Lane and the re-aligned Church Lane. Street typologies are provided in the DAS which illustrate the internal arrangement of movement corridors and dwellings interface within the site. The primary route would have footpaths on both sides. Green verges are proposed to provide a green setting. Secondary routes through the development would have footpaths but not verges. Shared surface streets are also proposed for short stretches where vehicle speeds are low and would be designed to encourage drivers to give priority to pedestrians. The South Coast Cycle Route (Sustrans Route 2) joins Church Lane to the east of the site. The proposal re-routes the cycle path through the site providing a dedicated connection with Horsemere Green Lane. The cycle route would then continue along its present route west along Horsemere Green Lane then north on Yapton Road.

Parking - The DAS provides an example of the types of parking provision that would be appropriate, including: on plot parking to the rear or side of dwellings which takes the car away from the street and provides high levels of natural surveillance; garages to provide secure off street parking (the DAS notes that the garage doors should be well designed and not dominate the building); off plot parking and visitor parking.

Crime prevention - The DAS includes a 'designing out crime' section which details measures and

design mechanisms that can be used to allow natural surveillance across the site. This guidance, combined with the guidance from the Sussex Police Designing Out Crime Officer should be taken into account at the detailed Reserved Matters stage.

Overall, it is considered that the Illustrative Masterplan appears to be a logical and rational response to the site, incorporating good design principles and informed by thorough analysis. The concept for the site is logical and addresses the constraints and opportunities presented by the site and fits in well with existing developments and the structure of the village whilst maintaining the semi-rural character of the area in accordance with Policies D DM1 and H SP2 of the modified Local Plan and GEN 7 of the Local Plan and CNP 11 of the CNP. A condition is recommended to ensure that the Reserved Matters stage is in substantial accordance with the Illustrative Masterplan.

Green infrastructure, open space, recreation and sports provision:

The DAS sets out the green infrastructure provision across the site. This includes a central village green next to the community centre which would include a pond and play space (LEAP). A large area to the west of the site would be a semi-natural greenspace and this could provide wetland, meadow, closely mown informal recreation areas and extended woodlands. This area includes 6 informal play features (LAP standard) and an equipped fitness trail with a minimum of 6 locations. Greenspace have raised concerns about the amount of play provision shown, however, it is considered that further detail on the provision and location of play areas can considered as part of the reserved matters application and the Public Open Space Scheme that will be required through the S106 Agreement. A network of hard surfaced footpaths would provide access and link the residential areas to the surrounding facilities. A secondary northern green provides an area of open space within the northern part of the development connecting to the existing playspace on Cropthorne Drive. Local residents of Cropthorne Drive have raised concerns that additional people would come through to use the existing playspace which is privately maintained. As there are play facilities and open space proposed on site which will be closer to the majority of the new residents it is unlikely that there would be any significantly increased usage of the existing playspace on Cropthorne Drive. Existing residents would also have the opportunity to use the new play facilities.

Buffer planting is proposed along the southern and western frontages which would help strengthen existing woodland tree belts and the settlement edge. The main access would be lines by grass verges and swales and pocket greens around the site provide local spaces for informal recreation. A single LEAP would be provided on the village green area. The total area of open space amounts to 14.38ha and would provide a high level of amenity for future residents as well as accessible green space for existing residents.

ADC Greenspace have requested confirmation of the areas of open space being proposed, but stated that the proposed indicative layout would suggest provision beyond the minimum which is welcomed. The illustrative masterplan has been updated to show the LEAP, LAP and fitness trail locations (as detailed above) and any further comments from Greenspace will be provided as an update. The details of the onsite open space and contributions, as well as future maintenance will be set out in the S106 obligation and an update on the final requirements will be provided. The landscaping scheme provided with the DAS is indicative and a full landscaping scheme would be required to be submitted with the Reserved Matters application, including further detail on play provision.

Overall, subject to the confirmation of further details, the provision of public open space meets the requirements set out in Policy GEN20 of the Arun Local Plan and Policy OSR DM1 of the modified eALP.

Trees:

An Arboricultural Survey Report has been submitted with the application in order to record the location, condition and value of all significant trees in the site. The most important trees within the site are contained in the southern and western woodland shelterbelts and protected by a TPO. The Tree Survey highlights some individual A and B grade oaks and other tree species which the Tree Officer recommends should ideally be retained as part of the design layout. However, the new roundabout would result in the loss of a large section of the southern tree belt, including some A and B grade trees. The Tree Officer recommends that this loss would need to be mitigated by a significant amount of new tree planting on the site.

Concerns were also raised by the Tree Officer about the rear of properties proposed to face towards the shelterbelt trees as there could be pressure to allow pruning or felling in the future if they are too close. It is considered that there is sufficient space within the layout to ensure a detailed design at Reserved Matters stage which addresses this issue (a 20m buffer is recommended). The Reserved Matters application would also need to be accompanied by an Arboricultural Method Statement and Impact Assessment and Tree Protection Plan. Conditions are recommended to ensure submission of these documents.

Overall, the proposal would result in the loss of more than one tree which is covered by a Tree Preservation Order. Policy GEN 28 of the Local Plan states that in this will not be permitted unless the benefits of the proposed development outweigh the amenity value of the protected trees. In this case, the benefits of the re-alignment of Church Road and the proposed roundabout would have significant benefits as it would provide spare capacity and resolve an existing constraint on the A259 which would not be possible within the constraints of the highway land. Therefore, the proposal complies with Policy GEN 28 of the Local Plan and Policy ENV DM4 of the modified Local Plan. The Climping Neighbourhood Plan includes Policy CPN 8 'Protection of Trees and Hedgerows' which also seeks to ensure that any loss of trees of hedgerows of arboricultural or amenity value will not be permitted unless the benefits of the proposed development outweigh the amenity value of the trees. In this case, as set out above, the benefits outweigh the amenity value of the trees.

Ecology:

A preliminary Ecology Survey was carried out in 2015 to determine the ecological constraints on the site. Representations raise a number of concerns about the habitats and wildlife present on the site. The site is predominantely an arable field with woodland, areas of scrub, scattered trees, ruderal vegetation and a hedgerow.

The site is not subject to any statutory or non-statutory designations and the closest designated site is Littlehampton Golf Course Site of Nature Conservation Interest located approximately 1km south of the site. Climping Beach Site of Special Scientific Interest (SSSI) is located 1 km south of the site. Natural England have confirmed that the proposed development would not damage or destroy the interest features for which the site has been notified and has no objection.

The Ecological Survey concluded that the main habitats being of value to wildlife had the potential to support populations of badgers, breeding birds, reptiles, bats and great crested newts. This led to further surveys being undertaken for bats, great crested newts and badgers to devise appropriate mitigation. Further surveys for breeding birds and reptiles were not considered necessary and a precautionary approach to works was recommended.

The Great Crested Newt Survey concluded that there were none on the site but a small population using ponds to the south of the site. Therefore, the potential for great crested newts to be utilising the site for commuting and hibernating was low as it was more likely that they would be using habitats to the south, as the road is a barrier. The Survey recommended a precautionary approach to works in order to minimise any potential impacts.

The Bat and Badger Survey identified that 62 trees were considered to have moderate or high value to roosting bats, located in the southern and western site extents. Three species of bats were observed foraging at the site, again in the woodland boundaries. If any trees identified as having potential to support a bat roost subsequently require removal or works, then a climbed inspection is recommended and if bats are found to be roosting within trees where felling is unavoidable a European Protected Species Mitigation Licence may need to be obtained. Measures to mitigate the impact of lighting on bat foraging would also be required and a condition is recommended to ensure that a lighting scheme is submitted.

No badger setts or secondary signs of badger were identified at the time of the survey but mitigation measures are recommended to safeguard individuals passing through the site during works.

In order to ensure that the mitigation measures identified in the Surveys are incorporated an Ecological Management and Mitigation Plan would need to be submitted for approval. This document should reflect the Survey mitigation measures and contain the information set out in the Ecologists response in order to demonstrate that the impacts on ecology can be managed and mitigated as well as enhanced. A condition requiring submission of an Ecological Management and Mitigation Plan is recommended and this should also include a requirement to update the habitat surveys if more than 12 months has elapsed between the survey and the point at which development decisions have been made at the site.

Overall, subject to the provision of the details requested above, it is considered that the proposed development accords with Policy GEN29 of the Local Plan, Policy CPN 9 of the CNP, Policy ENV DM5 of the modified Local Plan in relation to the impact on protected species and the potential for the scheme to protect existing habitats where possible and provide enhancements.

Historic environment:

The proposal is close to the medieval Earthworks E and SE of St Mary's Church in Climping and therefore it is important to determine whether the development would have an indirect impact on the setting of the site or whether the site has the potential to include heritage assets with archaeological interest.

A Desk-Based Historic Environment Assessment has been carried out which identified the archaeological potential of the site and concluded that the potential for heritage assets being located in the site was either low-medium (Roman, Anglo-Saxon, Medieval - related to Deserted

Medieval Village (DMV)), Medium (Pre-Historic) or Medium-High (Medieval - related to agricultural activity, Post Medieval). In relation to Post Medieval building remains are likely to be extant in two discreet areas of the site. As the development would have a direct impact upon an archaeological remains should they be present, a programme of mitigation measures has been suggested to establish the presence or absence if any remains.

The Archaeologist agrees with the conclusions of the assessment and the need for further investigation prior to development but disagreed with the proposed methods for further investigation. A condition is recommended to ensure that the site is evaluated by trial trenching ahead of development and that any archaeological interest it may contain can be properly preserved.

Historic England raised concerns about the assessment that had been carried out and whether it had adequately assessed the impacts on the setting of Climping's historic core, the expected effect of development on flood risk and consequent impacts on the preservation of Climping's historic core and buried remains within the DMV and whether the proposed development site contains any archaeological remains that are related and of equivalent significance to the DMV and whether it will cause them any harm. A further assessment was submitted which addressed these issues. Historic England were re-consulted and still had some outstanding queries but concluded that overall the impact on the setting of St Mary's Church, the Scheduled Monument and Clipming's Historic Core appears to be minimal and with mitigation the impact would be slight within 5 years and reduced to negligible within 10 - 15 years and that they would not object. Additional assessment will be required at the detailed design stage to ensure that the impacts from noise and the visual impacts on designated assets are fully taken into account.

Overall, the proposal accords with Policy HER DM1 and HER DM6 of the modified Local Plan and AREA 16 and AREA 17 of the Local Plan in that it protects the setting of Listed Buildings and, subject to conditions, it has been demonstrated that the development would not be harmful to the archaeological interest of the site.

Traffic and Highways

Access and Safety

Policy CPN 14 of the CNP resists new development that would have a detrimental impact on highway safety and the living conditions of residents. It also seeks appropriate contributions towards highway measures that would make the development acceptable. Relevant identified priorities for Climping include: increasing and enhancing pedestrian and cycle networks; safe crossing points for pedestrians, cyclists and equestrians to reduce the severance effect of the A259; and traffic calming measures on local roads. GEN7 of the ALP requires the safe movement of pedestrians and vehicles, giving priority to pedestrians.

The access plans have been submitted for approval as part of the outline application and show a reconfiguration of the road with the provision of a 50m diameter roundabout which would replace the existing roundabout at the junction of the A259/ Church Lane. A ghost right hand turn junction would provide site access from Church Lane, a bell-mouth junction Crookthorn Lane. A vehicular access is also proposed onto Horsemere Green Lane with footways to link into the existing ones to the south of the Lane. Pedestrian footways, either adjacent to roads or separated, are shown throughout the site on the Illustrative Masterplan.

The representations received raised safety concerns about the entry and exit onto Horsemere Green Lane, concerns about 'rat-running' through the new development and along Horsemere Green Lane, the location of the new access onto Church Lane and accidents that have taken place in the past. Middeton Parish Council also raised safety concerns in relation to Comet Corner. Littlehampton Town Council thought that the roundabout proposed would be an improvement but that the surrounding network also needed improvements. A traffic management scheme (four one-way traffic islands and 30mph speed limit) is currently being implemented along Horsemere Green Lane in order to deter motorists from using it as a rat-run. This will help with current concerns about rat-running along Horsemere Green Lane and it will address concerns about future 'rat-running' through the proposed development as less motorists will be using Horsemere Green Lane to access the A259 via Church Lane.

A Road Safety Audit: Stage 1 has been undertaken on the proposed access arrangements and this led to a Design Audit if the improvements being undertaken. The LHA are satisfied that the design of the proposed roundabout is compliant with Design Manual for Roads and Bridges standards and that any identified relaxations of the standards have been assessed and are acceptable. Some detailed design points have been raised which would be resolved at the detailed highway design stage.

The Transport Assessment provides an analysis of the accident data for the roads surrounding the site. In relation to Church Lane roundabout the TA concludes that the new roundabout would be expected to improve the current accident record, as the current roundabout does not comply with modern design standards.

The Arun Transport Study (Stage 3) identifies that due to the overall traffic flow increases over the Plan period at the Oyster Catcher junction, that the junction should be included in the mitigation package. Comet Corner was also identified for mitigation. The proposed mitigation is a roundabout for the Oyster Catcher junction and Comet Corner would require a junction improvement.

Following discussions with the LHA the applicants have agreed to the safeguarding of land for potential future Oyster Catcher safety improvement through the S106 Agreement. As there is no specific scheme for the junction it is not possible to ascertain the level of contribution necessary. However, the safeguarding of the land in the south western corner of the site and the transfer of the land to the County Council at no cost when it is required for the delivery of the junction improvement, would enable future delivery of the improvements.

In relation to Church Lane/ Horsemere Green Lane junction, there have been two slight accidents, one involving a cyclist. This is due to poor visibility for vehicles turning right out of the junction. The proposal includes a new access onto Horsemere Green Lane and this will re-route some of the traffic through the new development, leading to the new access onto the re-aligned Church Lane. The visibility of these new junctions would be an improvement over the existing junction. Accidents involving cyclists along the roads around the site would be reduced with the proposed WSCC cyclepath along the A259 and the new route through the site.

Overall, it is considered that the proposed new roundabout, combined with the new accesses into the site will provide a safe layout for traffic, cyclists and pedestrians in accordance with Policy GEN7 of the Arun Local Plan, Policy T SP1 of the modified Local Plan and Policy CPN 14 of the CNP.

Traffic and highway capacity

The development is forecast to have a total of 1509 two-way vehicle trips over a 12 hour period. Over the am and pm peaks, this would amount to 172 additional two-way trips in each peak period. The TA forecasts that the majority of the new traffic would use the A259 with 17% going north along Church Lane and 14% going towards Yapton Road. The modelling carried out by the applicants shows that the junctions assessed work within capacity and that with the combined effects of background traffic growth and the proposed development this would continue to be the case. However, the Arun Transport Study identifies that the development at Climping would have a capacity impact at the A27/A280 Patching North Roundabout, the A259/Church Lane and A259/B2187 (Tesco Roundabout). Highways England have not objected to the proposal, subject to the appropriate contribution being secured towards A27 highway mitigations required by the emerging Local Plan. As set out above, the Arun Transport Study apportions the impacts between the strategic sites. The Study does not apportion any of the A27 impacts to the Climping site, therefore no contributions are sought for A27 related works as it would not be compliant with the CIL regulations due to the lack of justification.

The Church Lane/ A259 roundabout is currently overloaded in both peak hours. This is backed up by the Arun Transport Study which identifies the impacts of the proposed emerging Local Plan allocations on the A259/Church Lane junction as 'severe'. Mitigation measures proposed by the Study include widening of the roundabout, as the improvements are limited to the highway boundary. The proposed new roundabout (described above) would be able to provide a significant improvement by incorporating additional land and therefore the scheme is forecast to provide adequate capacity for the background traffic growth and to accommodate the traffic from the new development. The LHA have recommended that in order to alleviate existing problems the junction improvements should be secured with an early trigger. This is set out in the S106 section of the Report.

In relation to the development contributing to the Patching North Roundabout and the Tesco Roundabout, the Arun Transport Study identifies that the proportional contribution for the Climping site would be 11% and 14% respectively (totalling £69,260) (in addition to 19% of the A259/Church Lane scheme which amounts to £32,110). As the development is proposing to exceed the required junction improvements for the A259/Church Lane (which, based on the lower cost scheme set out in the Study, amounted to £169,000) and provide a roundabout (estimated by the LHA to cost in the region of £800,000 - £1,200,000) then it is reasonable that no contributions are sought for the other junction improvements. This approach is supported by the LHA. The on-site delivery of the roundabout would lead to a re-distribution of the costs for the other junctions between the other strategic sites, as the other sites would not need to contribute to the A259/Church Lane scheme.

Overall, the development would deliver a strategic improvement to the highways infrastructure which would mitigation its traffic impacts and have wider benefits as it improves the existing congestion and provides a solution which is 'future proof' in relation to proposed growth in the area. The proposal therefore accords with GEN8 of the Arun Local Plan and Policy T SP1 of the modified Local Plan and Policy CPN 14 of the CNP as it has demonstrated that the transport effects on the local and strategic road network can be satisfactorily mitigated.

Pedestrian and cycle movements and sustainable transport

Proposals for development will be supported when they improve access to public transport services and support their provision (Policy GEN14 of the Local Plan and Policy T SP1 of the modified Local Plan). The proposal includes the provision of two new bus laybys on the A259, located to the west of the proposed roundabout and these would provide access to bus services for residents of the site. The details show a pedestrian refuge island in between the two laybys which links with a pedestrian footway into the southeastern corner of the site. A new footway along the southern side of the A259 would connect bus laybys with Crookthorn Lane. A contribution towards completion of a pedestrian footpath on the south side of Horsemere Green Lane between the application site and the footpath to the east of Woolridge Walk is also proposed, in order to provide a safe walking route between the site and future primary school at Ford or Yapton.

In relation to the provision of safe and attractive facilities for cyclists and pedestrians, the roundabout details show the existing shared cycleway/footway on the northern side of the A259 (east of the new roundabout) being widened to 3.5m from the existing junction westwards. To the east of the new roundabout, two pedestrian refuges are proposed in order to help pedestrians move from the northern side of the A259 to the existing footpath/cycleways leading into Crookthorn Lane. Three pedestrian crossing islands are proposed along the re-aligned Church Lane which would link with the footway along the western side of Church Lane. The northernmost crossing then links to the existing footway on the eastern side of Church Lane. Pedestrian links are also shown onto Horsemere Green Lane which links to the existing residential areas and to the south western corner to link to existing bus stops and Baird's Farm Shop. A further pedestrian link is shown on the western boundary of the site adjacent to the Oyster Catcher and Yapton Road. Crookthorn Lane provides the route to St Mary's Primary School and there is no pedestrian provision for the majority of the road. The Parish and representations also raise concerns about the lack of controlled crossing for local roads or the A259 as well as the lack of a safe route to school (Yapton or Climping). There is limited scope to provide further footways along Crookthorn Lane and warning signs are provided at present. The Local Highway Authority have advised that given the low volume of vehicular movements associated with the route it is not considered that an increase in pedestrian movement would constitute a severe impact. The use of signalised crossings would not be appropriate as pedestrian movements would be too low to justify and would be dangerous.

National Cycle Network (NCN) Route 2 currently runs along Church Lane and then Horsemere Green Lane. The proposal includes diverting this route along the section of Church Lane that would be closed and then routing through the site to re-join with Horsemere Green Lane. However, WSCC are introducing a shared cycle/ pedestrian route to the south of the site, adjacent to the A259, which will divert NCN Route 2 along the A259 rather than it's current route through Yapton. Therefore the benefits of diverting this route through the site are likely to be reduced, although it would still benefit those cycling to and from settlements along the B2233, rather than between Littlehampton and Bognor. The Local Highway Authority are satisfied that there is sufficient footprint available to incorporate changes within the available land to allow a 3m shared route to go adjacent to the northwest side of the new junction and that this could be included within a S106 obligation.

A Travel Plan has not been provided but a condition is proposed to secure submission of one and the TA provides details of what is proposed to be includes, for example, a Welcome Pack including cycle vouchers or bus permits for new residents. The size of the roads on the development has been raised as a potential issue that would lead to more parking on the road.

The detail of internal roads and parking provision will be considered at the reserved matters application stage.

Overall, the proposal would provide improvements to public transport provision through the new bus-laybys, and the layout would ensure that pedestrians can access the services and facilities around the site in a safe and secure manner in accordance with Policies GEN14 and GEN15 of the Arun Local Plan and Policies T SP1 and H SP2 of the modified Local Plan and Policy CPN 14 of the CNP. The diversion of the NCN Route 2 through the site would provide an enhanced and safer route than at present and provision can be made through the S106 agreement to ensure that the new route along the A259 would not be prejudiced in accordance with Policy GEN15 of the Arun Local Plan and Policies T DM1 and H SP2 of the modified Local Plan.

Noise and Air Quality

Concerns have been raised about air pollution from increased traffic and unacceptable noise levels from traffic.

In relation to noise levels, any impacts from the development should not cause a significant adverse effect and should ensure that a good standard of amenity can occur. The initial Noise Assessment showed that the guideline levels for noise would be exceeded by a significant margin across the majority of the development site when windows are partially open to allow for ventilation. This means that the noise levels fall within noise exposure category A or B (depending on location and elevation) for both day and night road noise. The modified eALP states that for category B that noise should be taken into account when determining planning applications and where appropriate, conditions imposed to ensure an adequate level of protection against noise.

Following discussions with Environmental Health a revised Illustrative Masterplan was submitted in order to demonstrate that a 2m bund and 1m acoustic fence could be located between the southern tree belt and proposed dwellings on the southern boundary. The noise modelling was re-done which demonstrated that with mitigation the traffic noise level for the rear gardens would be circa 51 decibels which is below the guideline value of 55 decibels. Concerns were also raised about the mitigation proposed (e.g. ventilation measures) in order to attenuate for noise internally as this would have required future residents not to open windows in order to achieve satisfactory noise levels. The proposed response is to ensure that the properties within the noisiest part of the site would be designed with bedrooms and other sensitive rooms would be on the quieter facades and these rooms would have opening windows, in addition to the alternative ventilation. There are a small number of properties located within the south east corner of the scheme which are predicated to exceed the internal guideline value of 35 decibels. Planning conditions are recommended in order to secure the details of a noise attenuation scheme to ensure that the impact of noise is mitigated to acceptable levels, in line with the measures set out on the Illustrative Masterplan and accompanying noise assessments.

In relation to air quality, there are no designated Air Quality Management Areas (AQMA) in Arun, although the modified eALP identifies that congestion on the A259 at peak times causes poor air quality on parts of the A259. The site is within easy reach of established public transport services and would provide additional bus stops in order to allow future residents to access the bus service. The scheme also proposes the new roundabout which is predicted to reduce congestion on the roads in the area, thereby reducing the risk of localised air pollution. The scheme also makes provision for cycling and pedestrians and further detail on this would be expected at the

detailed application stage (e.g. ensuring cycle storage).

Therefore, subject to the appropriate mitigation measures being implemented the future residents would not be adversely affected by noise in accordance with Policy GEN32 of the Arun Local Plan and Policy QE DM1 of the modified eALP. The proposal accords with Policy GEN34 of the Arun Local Plan and QE DM3 of the modified eALP as it would mitigate any negative impacts and reduced congestion would lead to an improvement.

Flooding and drainage

Representations have raised concerns about localised flooding of Mulgrave Field, as well as lack of ditch maintenance and a high water table causing flooding. Concerns were also raised about coastal flooding and future sea defences. Policy CPN 12 of the CNP seeks to ensure that all developments in flood sensitive areas are designed and constructed to reduce the level of flood risk.

A Flood Risk Assessment (FRA) has been carried out which confirms that the majority of the site is within Flood Zone 1 (low risk). The modelling identified that whilst present day risks from tidal flooding is low, there are some areas of the site with a moderately high impact from tidal flooding in 2115 based on a 1:200 year flood event. The approach taken to address this is to locate as many units as possible outside this area of the site (the north east corner). The Illustrative Masterplan shows 3 dwellings and the commercial building would still be in the flood risk area. The FRA identifies measures to mitigate the flood risk, based on the Illustrative Layout and also demonstrates that there would be a safe access and egress from the site, that the EA flood warning system would be utilised, and sets out measures to be incorporated into future detailed designs (e.g. solid concrete floors at ground floor level). A condition is proposed to ensure that the measures are incorporated into the detailed design of dwellings at the reserved matters stage.

A Surface Water Drainage strategy has been carried out in order to provide an understanding of the drainage requirements for the site. This identified that currently surface water flows from west to east across the site towards an exit point towards the north east of the site. The potential for infiltration methods is likely to be limited but there may be some potential which should be investigated further to inform the detailed design. The outline drainage strategy for surface water includes potential areas for permeable paving, swales and surface water storage areas which would be able to accommodate the required storage volume. The comments from both ADC drainage engineers and WSCC Flood Risk Management emphasis the need to fully investigate options for infiltration methods before ground attenuation. Conditions are proposed in order to ensure that a suitable SuDs scheme is developed informed by winter groundwater monitoring and percolation tests. WSCC Flood Risk Management have also highlighted the importance of local field boundary ditches being maintained and highlighted on future plans.

Overall, sufficient information has been provided to demonstrate that a SuDs scheme for the site could be developed based on the principles in the Strategy and shown on the Illustrative Masterplan in accordance with Policy GEN9 of the Arun Local Plan and Policy W DM3 of the modified Local Plan.

Foul drainage

There is a requirement for new major developments to demonstrate that adequate foul capacity exists or can be provided as part of the development to ensure good water quality in the district and to meet the needs of future occupiers. A Foul Water Strategy has been submitted to support the application. The proposed strategy for the site would be to discharge foul water from the site to the existing foul water manhole to the north of the site within Horsemere Green Lane. A pumping station may be required in order to connect to the existing sewer. The report states that a pumping station would require a compound areas of 8m x 12m with a 15m offset distance from any habitable buildings. Southern Water have confirmed this distance would comply with their standards. The on-site foul water and pumping stations are proposed to be offered to Southern Water for adoption. The capacity check carried out identified that improvements to the existing network are required in order to accommodate flows from the development. The works required would be secured via a S98 (sewer requisition) agreement with Southern Water. There is also a public sewer crossing the site and the proposed Illustrative Layout allows for the necessary easements. The strategic solution for this site identified in the evidence supporting the modified eALP is either pumped or gravity discharge to Ford treatment works. Should improvements to the existing network not be sufficient to accommodate flows, a direct connection could be made to Ford treatment works (located 920m from the site) which would need to be agreed with Southern Water before being carried out.

Southern Water have commented that the exact position of the sewer should be determined on site before the layout is finalised. A condition is recommended to ensure that the drainage infrastructure on site is protected. Southern Water have confirmed that the needs of the development cannot be accommodated without providing additional local infrastructure and have recommended a condition to ensure that a scheme is submitted and approved prior to development commencing.

Subject to conditions requiring submission of a detailed foul drainage scheme the proposal accords with Policy GEN9 of the Arun Local Plan and Policy W DM1 of the modified Local Plan as it demonstrates that the infrastructure could be upgraded to ensure sufficient capacity for the development.

Supporting Infrastructure

Development is only acceptable with the provision of or contributions to the necessary infrastructure and facilities to mitigate the impacts of the development. Representations raised concerns about the lack of capacity of education and healthcare facilities in the area. The modified Local Plan Policy H SP2c sets out the infrastructure requirements for the site, which include:

- a new one-form (expandable to two-form) entry primary school and nursery places
- improvements to the A259 between Climping and Littlehampton (see Highways section above)
- a Commuity hub with - new retail, commercial and community facilities, a new library facility and contributions towards a new healthcare facility which will be provided in Ford.

The proposal includes two buildings, the first could be used for a village hall, doctor's surgery or pre-school nursery. The second is a retail unit, located close to the site access. The community building would meet the requirements of Policy H SP2c in providing a building which could house the library facility (self service) and nursery facilities. WSCC have requested a new tier 7 facility on site or a contribution towards a project to enhance library space with improved digital access at

Littlehampton Library should the community facility either not progress or progress without space for Library facilities'. The applicant has confirmed that the community building could be suitable for a library facility. It is therefore suggested that the S106 Agreement is worded flexibly to provide a facility as part of the community building or if that does not come forward, that a contribution is made towards Littlehampton Library.

The modified Local Plan policy requires a contribution towards a new healthcare facility to be provided at Ford. The NHS have requested a funding contribution of £329,013 towards Avisford Park GP surgery in Yapton for the infrastructure needs of managing GP consultant Health Care. This is justified on the basis that the impact of the proposed housing will fall onto the provision of healthcare at Avisford GP Surgery which currently serves 10,500 patients and is at full capacity. The contribution would be utilised to add on additional infrastructure and associated costs in order to provide healthcare to new residents.

WSCC have confirmed that the present primary and secondary schools within the catchment areas of the proposal would not have space capacity and would be unable to accommodate the children from the development. Accordingly contributions are requested (based on a formula to allow the contribution amounts to be based on the housing mix at the reserved matters stage). The contributions are proposed to be spent on: a new primary school to be located at Ford or Yapton, whichever strategic site is better placed to educate pupils from the Climping development; Phase 2 of a new secondary school and a new sixth form; or expansion of the Littlehampton Academy and sixth form should the new school not progress.

Fire and rescue contributions have been sought by WSCC (formula based) to provide new technological equipment such as fire lances and thermal imaging cameras to serve the parish of Climping.

Leisure - Additional details are awaited on the specific projects in relation to contributions for sports halls, swimming pools and sports pitches. An update will be provided.

The highways infrastructure and open space requirements are set out in the relevant sections above and further detail is set out in the S106 section table attached to this report.

In order to mitigate against the impact of growth Sussex Police have calculated that the cost of policing new growth in the area equates to £44,772.52 to fund the future purchase of infrastructure to serve the proposed development.

Subject to the satisfactory conclusion of S106 negotiations it is considered that there are no barriers to achieving compliance with Policy GEN8 of the Arun Local Plan and Policies H SP2, H SP2c, INF SP1 and INF 2 of the modified Local Plan by ensuring provision of the required infrastructure. An update on the final S106 requirements will be provided.

Conclusion

The application site is outside the defined built-up area boundaries and contrary to Policies GEN2 and GEN3 of the ALP and the intention of the CNP to protect countryside. As set out above these policies are out-of-date and carry limited weight. The site is in a sustainable location which has been assessed through the modified eALP and identified as a strategic site suitable for housing. It is considered that the principle of development on this site is acceptable. The development will

deliver a strategic highway improvement for the A259, make a significant contribution towards housing and affordable housing in the District, boost the sustainability of Climping and provide additional open space and community facilities.

There are no specific policies in the Framework that indicate that this development should be restricted. Therefore it can be concluded that the adverse impacts do not significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.

## HUMAN RIGHTS ACT

The Council in making a decision should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (right to respect private and family life) and Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes unreasonably with any local residents' right to respect for their private and family life and home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

## DUTY UNDER THE EQUALITIES ACT 2010

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

## SECTION 106 DETAILS

See Table to follow Report.

## RECOMMENDATION

**APPROVE CONDITIONALLY SUBJECT TO A SECTION 106 AGREEMENT**

1 The permission hereby granted is an outline permission under s92 of the Town and Country Planning Act 1990 (as amended) and an application for the approval of the Local Planning Authority to the following matters must be made not later than the expiration of 3 years beginning with the date of this permission:-

(a) Layout;
(b) Scale;

(c) Appearance;
(d) Landscaping.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

2 The development hereby permitted shall begin not later than two years from the date of the approval of the reserved matters to be approved.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3 The development hereby approved shall be carried out in accordance with the following approved plans :

P14 4899-01 Rev F - Feasibility Illustrative Masterplan
P14 4899 03 - Acoustic Barrier to A259 Illustrative Proposals
4724/002 Rev D - Proposed Roundabout
4724/004 Rev B - Proposed Roundabout Details
4724/005 - Horsemere Green Lane Proposed Access

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy GEN7 of the Arun District Local Plan.

4 The development hereby permitted shall not be carried out except in substantial accordance with the Illustrative Masterplan P14 4889-01 Rev F and the Design and Access Statement (Dec 2016).

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy GEN7 of the Arun Local Plan.

5 No development shall be carried out unless and until a schedule of materials and finishes to be used for external walls and roofs of the proposed buildings have been submitted to and approved by the Local Planning Authority. A 'statement of detail' shall be submitted setting out details of proposed windows and doors, details of the depth of recess/reveal from the brickwork, sills and lintels, brick bonding, brick detailing, eaves detailing and rainwater goods. The materials and 'statement of details' so approved shall be used in the construction of the buildings.

Reason: To enable the Local Planning Authority to control the development in details in the interests of amenity by endeavouring to achieve buildings of visual quality in accordance with policy GEN7 of the Arun District Local Plan. It is considered necessary for this to be a pre-commencement condition because the use of satisfactory external materials goes to the heart of the planning permission.

6 Prior to commencement of development, a plan shall be submitted to the Local Planning Authority to show how the development will be divided into phases and a phasing programme shall be submitted in writing to the Local Planning Authority and implemented in full.

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Policy GEN7 of the Arun Local Plan. It is considered necessary for

this to be a pre-commencement condition because the phasing of the development needs to be satisfactory before work commences.

7 Prior to commencement of development a design code masterplan shall be submitted to, and approved in writing, by the Local Planning Authority. This document shall demonstrate how the detailed proposals will reflect the objectives of the Illustrative Masterplan P14 4889-01 Rev F and Design and Access Statement (Dec 2016) and will provide further details on matters such as character areas, street hierarchy, building typologies, key buildings, the approach to car parking, structural planting, street furniture, lighting and treatment of the public realm. The development shall be carried out in accordance with the approved design code.

Reason: To enable the Local Planning Authority to control the development in details in the interests of amenity by endeavouring to achieve buildings of visual quality in accordance with policy GEN7 of the Arun District Local Plan. It is considered necessary for this to be a pre-commencement condition because the design of the scheme goes to the heart of the planning permission.

8 No development above damp proof course (DPC) level shall take place until there has been submitted to, and approved by, the Local Planning Authority, a landscaping scheme including details of hard and soft landscaping and details of existing trees and hedgerows to be retained, together with measures for their protection during the course of the development. The approved details of the landscaping shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation. The landscaping scheme should accord with the phasing plan for the site.

Reason: In the interests of amenity and of the environment of the development in accordance with policy GEN7 of the Arun District Local Plan.

9 All construction works are to be carried out in strict accordance with an Arboricultural Method Statement Report to be submitted and approved by the Local Planning Authority. The Arboricultural Method Statement must include provisions for:
- a pre-commencement site meeting to take place between the Local Planning Authority Tree Officer and the Arboricultural Consultant representing the site owners to ensure that the protection measures have been erected and positioned in accordance with the Tree Protection Plan.
- a schedule of site monitoring/ supervision visits and reporting procedures to be agreed at the site meeting
- a method statement should any utility service route connections bisect retained tree Root Protection Areas/ Zone.

Reason: To ensure the retention and maintenance of trees and vegetation which is an important feature of the area in accordance with policy GEN7 of the Arun District Local Plan.

10 No operations including site access, demolition or associated construction activities, shall take place on the site unless and until all the existing trees/bushes/hedges to be retained

have been protected by a fence in accordance with BS5837 (2012) and Section 9, to be approved by the Local Planning Authority for erection around each tree, group of trees and vegetation to a distance of 15m or to the Root Protection Area (RPA) as calculated in accordance with Table 2 of BS5837 (2012) to be agreed in writing by the Local Planning Authority.

Within the areas so fenced off the existing ground must not be cultivated, nor must it be lowered or raised or added to by the importation and spreading of top soil unless agreed by the Local Planning authority. There must be no materials, temporary buildings, plant machinery or surplus soil shall be placed or stored thereon without prior written approval of the Local Planning Authority.

No trenching should occur within the protective fencing surrounding the Root Protection Area. If however there is no alternative but to locate the services then its encroachment into the Root Protection Area must be kept to a minimum and where the roots should be exposed using compressed air technology, such as the air spade to reduce damage caused by mechanical methods. If roots requiring severance to allow for the passage of services is necessary then an arboriculturist would be required to assess and determine whether the loss of the roots would be detrimental to the continued health and stability of the affected tree.

Protective fencing shall be retained intact for the full duration of the development hereby approved and shall not be removed or repositioned without prior written approval of the Local Planning Authority.

Reason: To ensure the retention and maintenance of trees and vegetation which is an important feature of the area in accordance with policy GEN7 of the Arun District Local Plan. It is considered necessary for this to be a pre-commencement condition because trees need to be protected in advance of works commencing on-site.

11 Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the SuDS Manual produced by CIRIA.

Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

12 Immediately following implementation of the approved SuDS scheme and prior to occupation of any part of the development, the developer/applicant shall provide the local planning authority with as-built drawings of the implemented scheme together with a completion report prepared by an independent engineer that confirms that the scheme was built in accordance with the approved drawing/s and is fit for purpose. There shall be no deviation to the approved scheme other than with the written consent of the Local

Planning Authority. The scheme shall thereafter be maintained in perpetuity.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

13 The development shall not proceed until formal consent has been approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority (WSCC) for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourse on the site.

Any discharge to a watercourse must be at a rate no greater than the pre-development run off values.

Reason : To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

14 Development shall not commence until full details of the maintenance and management of the SuDS system is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include (a) details of financial management of the site including arrangements made in the event that the management company (or any subsequent management company) is no longer able to fulfil its duties; and (b) arrangements for the replacement of major components at the end of the manufacturers recommended design life.

Reason: To ensure the efficient maintenance and on-going operation of the SuDS system and to ensure the best practice in line with guidance set out in 'The SuDS Manual' CIRIA publication ref: C753 Chapter 32.

15 Upon completed construction of the SuDS System but prior to occupation of any part of the scheme, the owner or management company shall either provide the local planning authority with an updated copy of the management manual incorporating any changes as a result of construction/implementation or confirm in writing that no changes are required to the manual.

No further changes shall be made to the approved SuDS Maintenance & Management Plan/Regime including the management company responsible or the financial arrangements between the owners of the dwellings & the management company other than with the written consent of the Local Planning Authority.

The owner or management company shall thereafter strictly adhere to and implement the recommendations contained within the manual to ensure that the system is maintained in perpetuity.

Reason: To ensure the efficient maintenance and on-going operation of the SuDS system and to ensure the best practice in line with guidance set out in 'The SuDS Manual' CIRIA publication ref: C753 Chapter 32.

16 The development layout shall not be agreed until such time that arrangements for the future access and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site has been submitted and approved in writing by the Local Planning Authority.

No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities of any watercourse on or adjacent to the site.

Reason: To ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion and to ensure that the proposed development is does not adversely effect existing watercourse in accordance with policy GEN11 of the Arun District Council Local Plan.

17 The development shall not commence until a drainage strategy detailing the proposed means of foul and surface water disposal and an implementation timetable, has been submitted to and approved in writing by the Local Planning Authority in consultation with the sewerage undertaker. The development shall be carried out in accordance with the approved scheme and timetable.

Reason : To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

18 No development shall commence until the exact location of the rising main and foul sewer pipe, which is known to cross the site has been identified. A plan identifying the locations of Southern Water Infrastructure must be submitted that identifies the locations of the pipe run and a 5m easement from the centre line of the pipe must be submitted to the Local Planning Authority in writing for their written approval that work can commence. Any addition pipework or Sothern Water infrastructure found during construction should be investigated to ascertain its condition, the properties served, and potential means of access before further works commence on site.

Reason: To ensure that the proposed development is drained in accordance with policies GEN7 and GEN9 of the Arun District. It is considered necessary for this to be a pre-commencement condition because the location of the raising main and foul sewer pipe has to be determined before works commence to avoid damaging the infrastructure.

19 Prior to commencement of development, a scheme for flood mitigation and management (based on the measures set out in the approved Flood Risk Assessment (FRA) (December 2016 reference 2323 Ambiential) shall be submitted to, and approved in writing, by the Local Planning Authority. The development permitted by this planning permission shall only be carried out in accordance with the approved scheme.

Reason: To reduce the risk of flooding to the proposed development and future occupants. In accordance with policies GEN7 and GEN11 of the Arun District Local Plan and CPN 12 of the Climping Neighbourhood Plan (2015). It is considered necessary for this to be a pre-commencement condition because ensuring flood mitigation and management goes to the heart of the planning permission.

20 Prior to the commencement of construction works or any preparatory works detailed Ecological Management and Mitigation Plan including a Schedule of Works shall be submitted to the LPA for approval and will be based on the recommendations within the supporting Preliminary Ecological Appraisal Report (May 2016), Great Crested Newt Survey Report (June 2016) and the Bat and Badger Survey Report (June 2016) . All approved details shall then be implemented in full and in accordance with the agreed timings and details.

The Ecological Management and Mitigation Plan shall include but not be restricted to:
- timings for clearance of trees or scrub to avoid impacts on breeding birds
- two phased cutting of grassland along site boundaries to deter reptiles and amphibians
- details of compensatory and additional tree planting
- details of compensatory boundary habitat planting
- details and location of bird and bat boxes, log piles around the site boundaries
- creation of at least three wildlife ponds
- boundary features to measure at least 5m width for the majority of the site to allow for commuting badgers
- measures to minimise the disturbance of badgers as set out in Section 4.14 of the Bat and Badger Survey Report (June 2016)

Should the detailed layout of the site require the removal of further trees which have the potential to support bats, a climbed tree inspection survey will be required.

Reason: This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site in line with national guidance and policy GEN23 and GEN29 of the Arun District Local Plan (2003). It is considered necessary for this to be a pre-commencement condition because of the need ensure measures are in place to protect wildlife and habitats on site prior to any disturbance.

21 No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,
- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of effective wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area in accordance with Arun District Local Plan policy GEN7. It is considered necessary for this to be a pre-commencement condition because of the safety and amenity issues that need to be addressed.

22 The applicant shall prepare and submit for approval an Employment and Skills Plan for the construction phase of development. Following approval of the Employment and Skills Plan the developer will implement and promote the objectives of the approved plan.

Reason: in accordance with policy SKILLS SP1 of the modified emerging Arun District Local Plan (2017)

23 No machinery/vehicles or plant shall be operated on the site, no process shall be carried

out and no deliveries taken at or despatched except between the hours of:

7.00 a.m. and 6.00 p.m. on Mondays to Fridays inclusive
8.00 a.m. and 1.00 p.m. on Saturday
Not at any time on Sundays or Public Holidays

Reason: In the interests of amenity in accordance with Arun District Local Plan policies GEN7 and GEN32.

24 No raw materials, finished or unfinished products or parts, crates, packing materials or waste shall be stacked or stored on the site except within the storage areas identified in the Construction Management Plan at any time approved by the Local Planning Authority.

Reason: To safeguard the amenities of neighbouring properties in accordance with policy GEN7 of the Arun District Local Plan.

25 A scheme for external lighting shall be submitted and approved in writing by the Local Planning Authority. The scheme shall ensure that the lighting is sensitive to bats by minimising the lighting of the woodland along the southern and western boundaries and shall comply with Institution of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Light, Obtrusive Light Limitations for Exterior Lighting Installations for Zone E2.

Reason: To control the residential amenities of the local environment in accordance with Arun District Local Plan policies GEN7, GEN33.

26 An acoustic barrier and associated tree and shrub planting, details of which shall be submitted and approved by the Local Planning Authority before development is commenced, shall be formed along the boundary of the site as shown on the Illustrative Masterplan P14 4889-01 Rev F and no building shall be occupied until such acoustic barrier has been completed. In the event that any trees and shrubs, planted in accordance with this condition, die or become seriously damaged or diseased within a period of 3 years following planting, they shall be replaced in the next planting season with others of similar size and species.

Reason: In the interests of the environment of the development, in accordance with Arun District Local Plan policies GEN7 and GEN32. It is considered necessary for this to be a pre-commencement condition because the details of the barrier need to accord with the detailed site layout.

27 Before first occupation of plots along the southern and eastern boundaries of the site, post validation testing shall be undertaken by a competent person to determine compliance with the acoustic report (Ref 2001W-SEC-00002-02, dated Dec 16 and subsequent correspondence). This must be submitted and agreed in writing with the Local Planning Authority before first occupation of the aforementioned plots.

Reason: To safeguard the amenities of nearby residents in accordance with Arun District Local Plan policies GEN7 and GEN32.

28 No development shall commence until the vehicular access serving the development has been constructed in accordance with Bellamy Roberts drawing 4724/004 Rev B.

Reason: In the interests of road safety in accordance with policy GEN7 of the Arun District Local Plan. It is considered necessary for this to be a pre-commencement condition because establishing an access goes to the heart of the planning permission.

29 No part of the development shall be first occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport in accordance with Policy GEN7 of the Arun District Local Plan..

30 At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low-carbon energy sources or equivalent fabric first standards that would secure a 10% reduction in energy use. Details and a timetable of how this is to be achieved, including details of physical works on site, shall be submitted to and approved in writing by the local planning authority [as a part of the reserved matters submissions]. The approved details shall be implemented in accordance with the approved timetable and retained as operational thereafter, unless otherwise agreed in writing by the local planning authority.

Reason: In order to seek to achieve high levels of energy efficiency in accordance with the
aims of the NPPF and emerging Arun Local Plan Policy ECC SP2.

31 No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

Reason: The site is of archaeological significance in accordance with Arun District Local Plan Policy GEN7. It is considered necessary for this to be a pre-commencement condition because archaeology can only be investigated before construction commences.

32 Prior to the commencement of development, a strategy for the provision or facilitation of broadband provision to future occupants of the site shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall seek to ensure that upon occupation of a dwelling, either a landline or ducting to facilitate the provision of a broadband service to that dwelling from a site-wide network, is in place and provided as part of the initial highway works and in the construction of frontage thresholds to dwellings that abut the highway. Unless evidence is put forward and agreed in writing by the Local Planning Authority that technological advances for the provision of a broadband service for the majority of potential customers will no longer necessitate below ground infrastructure, the development of the site shall be carried out in accordance with the approved strategy.

Reason: To ensure that the needs of future residents to connect to the internet does not necessarily entail engineering works to an otherwise finished and high quality living environment in accordance with emerging Arun Local Plan policy TEL SP1. It is considered necessary for this to be a pre-commencement condition because the provision of broadband needs to be incorporated into the design for the site.

33 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure)(England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

34 A formal application for connection to the public sewerage system is required in order to service this development. To initiate a sewer capacity check to identify the appropriate connection point for the development, please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire, SO21 2SW (Tel 033 0303 0119) or www.southernwater.co.uk.

35 INFORMATIVE: The applicant is advised to enter into a legal agreement with West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.