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Your Ref:

Our Ref: PAA/171/17/

Please ask for: Claire Potts

01903 737698

8th March 2018

Dear Mr White

Pre-Application Advice

Proposed erection of 27No. Dwellings.
Boweries Barnham Road Eastergate Chichester

I write regarding the above matter and your enquiry received on 15th September 2017.

Description Of Proposed Development

From the details submitted I understand that you propose residential development of 27 dwellings on land at Boweries, Barnham Road. This would include demolition of the existing detached dwellings house. The proposed dwellings would be a mix of 3 and 4 bed units with associated access of Barnham Road and landscaping.

Description Of Site

The site is a long rectangular plot bounded by tree lines and hedgerows.

The northern and southern portions of the site are currently used for grazing horses and includes an existing house and several barns on the eastern corner. The proposed access would utilize the existing access to the south of Barnham Road.

The site is 1.4 hectares in size and there are no trees of any significance affected by the proposed development.

Description Of Locality

The site is located on the western side of Barnham, to the south of the B2233 Barnham Road, between the villages of Eastergate and Barnham (actually within the parish of Eastergate). The site has an area of approximately 1.4 ha and lies approximately 500m north-west of Barnham. It is within the gap between the two settlements. The surrounding character is defined by large detached properties set back from the road, occupying narrow plots with long garden areas to the rear.

The land use surrounding the site varies, including residential areas and commercial development.

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Public Footpath No 321 runs outside of the southern edge of the Site, with agricultural land beyond.

The site is part of the proposed strategic allocation for Barnham/Eastergate/Westergate (BEW) in the emerging Arun Local Plan for 2,300 homes in the plan period, with a total of up to 3,000 dwellings in total.

Planning Issues

The following issues have been identified for consideration.

Principle

Design

Neighbour Amenity

Amenity Space Provision

Bin Storage

Affordable Housing

Highways, Transport and Parking

Sustainability

Sustainable Construction

Flooding/Drainage

Listed Building(s)

Conservation Area

Protected Trees

Open Space Provision

Light Pollution

Noise Pollution

Contamination

Infrastructure Provision

Biodiversity

Protected Species

Crime

Loss of Agricultural Land

Landscape Impact

Archaeology

Relevant Planning History

EG/87/79	Outline application for residential development	Refused 08-11-1979
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Comment On Site History

There is no relevant recent history.

Relevant Policies - the following policies are considered relevant to your proposal:

Arun District Local Plan:	GEN11	Inland Flooding
	GEN12	Parking in New Development
	GEN14	Public Transport
	GEN15	Cycling and Walking
	GEN18	Crime Prevention
	GEN2	Built-up Area Boundary
	GEN20	Provision of Public Open Space within New Development
	GEN21	Renewable Energy

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GEN23	The Water Environment
GEN25	Water Resources
GEN28	Trees and Woodlands
GEN32	Noise Pollution
GEN33	Light Pollution
GEN34	Air Pollution
GEN7	The Form of New Development
GEN8	Development and the Provision of Infrastructure
GEN9	Foul and Surface Water Drainage
AREA2	Conservation Areas

Publication Version of the
Local Plan (October 2014):

C SP1 Countryside
D DM1 Aspects of Form and Design Quality
D DM2 Internal Space Standards
D DM3 External Space Standards
D SP1 Design
ECC DM1 Renewable Energy
ECC SP2 Energy and climate change mitigation
ENV DM3 Non Designated Sites
ENV DM5 Development and Biodiversity
ENV SP1 Natural Environment
GI SP1 Green Infrastructure and Development
H DM1 Housing Mix
HOR DM1 Horticulture
H SP1 Strategic housing, parish and town council allocations
H SP2 Affordable Housing
INF SP1 Infrastructure provision and implementation
LAN DM1 Protection of Landscape Character
OSR DM1 Open Space, Sport and Recreation
QE DM1 Noise Pollution
QE DM2 Light Pollution
QE DM3 Air Pollution
QE SP1 Quality of the Environment
SD SP1 Sustainable Development
SD SP2 Built-Up Area Boundary
SO DM1 Soils
T DM1 Sustainable Travel and Public Rights of Way
W DM1 Water Supply and Quality
W DM2 Flood Risk
W SP1 Water
HER DM1 Listed Buildings
HER DM3 Conservation Areas

Barnham & Eastergate Neighbourhood Plan 2014 Provision of allotments

POLICY CLW4

Barnham & Eastergate Neighbourhood Plan 2014 Trees and hedgerows

POLICY ES10

Barnham & Eastergate Neighbourhood Plan 2014 The Local Gap/Green Infrastructure Corridor

POLICY ES3

Barnham & Eastergate Neighbourhood Plan 2014 Protection of open views

POLICY ES4

Barnham & Eastergate Neighbourhood Plan 2014 Quality of design

POLICY ES5

Barnham & Eastergate Neighbourhood Plan 2014 Contribution to local character

POLICY ES6

Barnham & Eastergate Neighbourhood Plan 2014 Development affecting heritage assets

POLICY ES7

Barnham & Eastergate Neighbourhood Plan 2014 Footpath and cycle path network

POLICY GA2

Barnham & Eastergate Neighbourhood Plan 2014 Integration of new housing into surroundings

POLICY H4

Barnham & Eastergate Neighbourhood Plan 2014 Outdoor space

POLICY H5

Planning Policy Guidance

NPPF

National Planning Policy Framework

NPPG

National Planning Practice Guidance

Supplementary Guidance:

XXX6

Interim Affordable Housing Policy

Principle

The site lies in a countryside location outside the Built-up area boundary where the principle of development is considered unacceptable. Development Plan policies seek to exert a strict control over new development in the countryside to protect it for its own sake. Development will only be permitted if the criteria set out are met or where there is a strong justification for a countryside location. The Government's planning advice indicates that planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced.

The proposed site is outside of the built up area of Barnham in a location that has not been allocated for housing in the development plan. In the Publication Version of the Local Plan (2014), Policy H SP1 establishes strategic housing, parish and town allocations. The policy states that there will be a site specific allocation at Barnham/ Eastergate/ Westergate. This site is within the area illustrated on the policies map.

The Barnham and Eastergate Neighbourhood Plan (BENP) (2013) area covers the proposed site. As the NP has been made at the time when a decision is to be made on the application, it will have weight as part of the development plan. Therefore, this advice refers to the policies in the NP and it is recommended that they are addressed through the application submission.

The National Planning Policy Framework also states that neighbourhood plans should be in general conformity with the strategic policies of the Local Plan. Neighbourhood Plans should be focussed on non-strategic policies.

Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

The Council is unable to demonstrate an adequate supply of housing land as required by paragraph 49 of the NPPF. The suspension of the Examination into the Local Plan by the Planning Inspector on the grounds that the Council's Objectively Assessed Housing Need should be reviewed higher than that proposed in the Local Plan (580 units p.a). The Council will need to identify more suitable land supply to meet additional housing requirement. The OAN figure has been increased to 919 units p.a. Additional strategic sites have been assessed to meet this higher need figure and have now been to Examination (September 2017). A consultation on modifications is currently being undertaken following the Examination.

The National Planning Practice Guidance has provided clear guidance on the issue of the weight that can be given to both the Local Plan and emerging or made Neighbourhood Plans where the

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District Council cannot demonstrate the relevant supply of deliverable housing sites. Therefore the development plan policies relating to housing supply are out of date and the emerging Local Plan policies carry limited weight at this time. The relevant policies for the supply of housing in the NP, including the village development boundary, should also not be considered up to date.

Where the development plan is absent, silent or the relevant policies are out of date, the NPPF states that the presumption in favour of sustainable development requires the granting of planning permission, 'unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'. This approach only applies until the emerging Local Plan is adopted.

Sustainable transport and local facilities

The site is located within a suitable walking distance of the services and facilities located within Eastergate and Barnham. Bus route 85 and 85a provide an hourly service connecting Eastergate to the larger settlements of Barnham and Littlehampton. The nearest doctor's surgery is the Croft Surgery in Eastergate. The Six Villages Academy is to the west of the site and the Barnham Primary School and St Philip Howard Secondary School to the east

Employment

There are employment opportunities within Barnham and access to wider employment opportunities accessed by bus and train from Barnham Station.

The Local Plan Inspector commented that the BEW site is not 'greatly further away than some outlying western parts of 'greater Bognor Regis' from many of the urban area's centres of activity such as the town centre, the existing commercial and retail premises to the north of the town alongside the A29 and the Enterprise Bognor Regis employment allocation'. The Inspector also noted the limited bus services and that the allocation's size and location would provide opportunities for pump-priming of improvements to services.

Phasing and wider strategic site delivery

As this site is within the boundary of the proposed strategic allocation at BEW, the proposal has to be acceptable both as a 'stand alone' proposal and as an early phase of the wider BEW site. There will be infrastructure requirements when the site is considered as a whole which are set out in the Infrastructure Delivery Plan. An indication of the likely requirements is set out in the infrastructure section below. As discussed at the pre-application meeting a suitable mechanism needs to be found to ensure that bringing this proposal forward as an early phase of the BEW site will not jeopardise the delivery of the infrastructure that will be necessary for the whole site - that it 'pays a fair share' of the infrastructure costs. The proposal also needs to fit with the latest Masterplan for the BEW site in terms of the layout of the site, access roads and drainage strategy. The detailed Masterplanning work for the BEW allocation is at an early stage and at present the indicative masterplan excludes this parcel of land. This site needs to be comprehensively planned and included in the masterplanning for the whole site.

Summary

The proposal does not comply with the development plan but there are material considerations that would justify a recommendation to approve the principle of residential development on this site as it would not be contrary to the core principle within the NPPF. However, the site is within the BEW allocation, which will have full weight as the development plan covering this site when the eALP is adopted. Therefore, the site needs to be masterplanned with the rest of the site, as opposed to developed as a stand-alone housing site.

Design

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Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(i) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout. The BENP policy ES5 requires that all new development is of high quality design and ES6 requires that it contributes positively to local character. Policy H SP2 of the eALP requires that strategic allocations must be comprehensively planned and should have regard to a masterplan endorsed by the Council for the respective areas which incorporates high quality imaginative design giving a sense of place and a permeable layout.

The site is long and narrow which leads to a less than ideal site layout, with properties facing the side fences of other properties and garden fences facing onto the main street. The LEAP is an awkward shaped space to the side of the road. These issues would be overcome and a more acceptable place developed if the site is incorporated into the BEW masterplanning process. This would allow for the site to be designed with adjacent parcels of land, and open up opportunities for designing a successful scheme, rather than a linear cul-de-sac. As set out above, a detailed Masterplan needs to be developed for the site in order to set clear parameters for the design of the site in the context of the allocation.

The proposed development is considered unacceptable by reason of conflict with Policies H SP2 of the eALP in that it has not been comprehensively planned and therefore fails to incorporate a high quality imaginative design which gives a sense of place or permeable layout.

Housing Mix and Density

Policy HDQ5 of the BENP and H DM1 of the emerging Local Plan, require that a mix of housing types and sizes is provided. The latest housing needs evidence suggests the following percentage splits for market and affordable dwellings. The housing units proposed on the site are 3 and 4 bed units. This does not accord with the identified need for smaller 2 bed units (40-45% of market need).

Both categories of affordable housing below are reflecting a stronger need for smaller dwellings. As you haven't set out the proposed split between the affordable tenures (50% of each is recommended) I'm not able to comment on whether the overall affordable housing mix provides what is needed. I would suggest you look at this and then compare it to the table below.

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/Starter Homes	15-20%	50-55%	25-30%	0-5%
Affordable Rented	35-40%	30-35%	20-25%	5-10%

The density of the housing needs to make efficient use of the land while providing a mix of dwelling types and maintaining character and local distinctiveness. As identified in the Landscape and Visual Appraisal, the current character of the area is defined by detached dwellings set back from the highway on narrow plots with long gardens to the rear. A stand-alone development would be out-of-character with the current surroundings, however, when the BEW strategic allocation starts to be delivered, the character will change and it is envisaged that this site would form part of the new character of the area.

Space standards

The dwelling space standards proposed for the market housing need to meet the minimum internal space standards set out in the eALP Policy D DM2.

Policy HDQ7 'Design new development to be of high quality of the BENP should also be taken into

account when preparing the full application.

Neighbour Amenity

Planning Policies and National Planning Guidance support the efficient and effective use of land. Policy GEN7(i) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout. Arun District Local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. The NPPF further indicates that good design should contribute positively to making places better for people.

As a stand-alone site, the amenity of neighbouring property to the west (Bexstone House) needs to be taken into account, making sure that existing vegetation screening is retained and any new dwellings avoid any loss of sunlight or privacy through the design and siting of the dwellings.

As this site will be part of a wider development, along with current neighbouring land, the masterplanning of the site will address neighbouring amenity.

Amenity Space Provision

The NPPF states that good design should contribute positively to making places better for people and indicates that creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character. Policy GEN7 of the Arun District Local Plan further indicates that development will be permitted provided that amongst other considerations the proposal creates attractive places and spaces with the needs of people in mind.

Policy HDQ8 of the BENP requires good quality private amenity space to be provided. Based on the current layout, I would have concerns about the ability to achieve sufficient outdoor private amenity space for some of the plots shown.

Developments are expected to provide open space on site. The Council's SPG guidelines which apply to developments of houses and are based broadly upon the National Playing Fields Association's (NPFA) "Six Acre Standard". The superseded Fields in Trust guidelines (FIT) 'Beyond the Six Acre Standard' recommends that 3.2 hectares of open space are provided for every 1,000 people ie 32 square metres of open space per person.

We would require confirmation of the areas of public open space being proposed with this development, as a minimum proportionate to the proposed dwellings. As a stand-alone development this would appear to be deficient in open space offer and without masterplan connectivity to adjacent land difficult to assess (stand alone requirement would be for this proposal to provide .20Ha POS, LEAP, LAP and MUGA contribution).

However, as the principle is that this site should be masterplanned with the allocation, this would mean that the provision of open space would be in relation to the whole site, rather than this part alone. Overall, as with other aspects of the proposal, consideration needs to be given to the provision of open space in relation to the wider scheme and the overall balance of provision across the site, in addition to the most suitable locations for this provision.

Affordable Housing

Policy requirement

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In implementing its Affordable Housing Policy, the Council will seek 30% affordable housing on-site on residential developments of 11+ residential units. The tenure, dwelling type/size and location of on-site affordable housing must be agreed with the Council's Housing Strategy and Enabling Manager.

Tenure

The tenure of the affordable housing is to be agreed with the Council but a split of 75% rented and 25% intermediate housing is initially sought. The Council requires a mix of Social and Affordable Rent to be provided within the 75% rented quota, the precise mix can be agreed with the Housing Strategy and Enabling Manager. The weekly rents, including service charges, for the Affordable Rented homes charged by a registered partner must not exceed the Local Housing Allowance (LHA) level for each property type.

Housing Need

There is high demand for affordable housing throughout the Arun District for both rent and low cost home ownership. As at January 2018 there were over 1,000 households in housing need on the Council's housing register. Based on the number of units proposed, this site would require a 30% provision of affordable housing on site (8 units)

Property sizes design and mix

The applicants should ensure that the quantum of affordable housing is broadly delivered to ensure a higher percentage (35-40%) of 1 and 2 bedroom units for social rented.

The intermediate housing (shared ownership) dwellings should comprise of a mix of 1, 2 and 3 bed dwellings - 4 bed dwellings are not recommended for shared ownership purposes.

Integration - The affordable housing should be integrated into the overall development and constructed and designed to be indistinguishable from the market housing. The applicants should seek to make at least 1% of the rented affordable dwellings are fully wheelchair accessible.

S106 considerations and Affordable Housing Agreement

The Council would not support capped percentage transfer values to a provider of affordable housing being applied to the affordable housing dwellings.

The Council would request that the applicants engage with one of our preferred registered partners, the Council itself or an approved non registered partner for the acquisition of the affordable housing. Starter Homes have been assessed as not being affordable to most of those in housing need in the Arun area. At present therefore, the Council would not support the inclusion of Starter Homes as an affordable housing product and would seek on-site affordable housing as described in this consultation response.

All of the necessary affordable housing requirements would need to be included in S106 planning obligation not secured by planning condition.

Summary

In terms of the provision of affordable housing there is no objection in principle but an Affordable Housing Statement is required in order to be able to comment further on an on-site provision of 30% affordable housing.

Highways Transport And Parking

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Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to accessibility of the site to public transport or services, or location within a town centre. Some Guidance is provided within Appendix 2 Parking Standards of the Arun District Local Plan. It is not possible to comment on the acceptability of the scheme in relation to highways and transport without the views of the Local Highway Authority (WSCC). Separate advice should be sought on these issues.

The Arun Transport Study identifies mitigation measures/ required improvements in relation to proposed strategic sites and consideration will need to be given to how this site can contribute to this. Discussions with the Local Highway Authority will need to include any strategic highway requirements, pedestrian links, safe routes to schools and any mitigation required on the A29 junctions.

Any transport assessment to be submitted for this application will need to take into account the relevant findings of the Local Plan Transport Study to make sure that the application contributes to wider transport improvements that may be necessary to ensure that the impact of the development on the local road network is acceptable in isolation and in combination with other potential development in the area, including contributing towards the realignment of the A29.

In terms of cycling routes, the masterplan for the site should ensure that links are provided with Barnham, Eastergate and Westergate as well as further afield. GA2 of the BENP supports proposals that improve and extend the existing footpath and cycle path network. The current high level masterplan indicates an east-west cycle route to the south of this site. The detailed masterplan should clearly show the pedestrian and cycle network through the site and how it links to key destinations and existing cycle networks. It should demonstrate how the West Sussex Cycling and Walking Strategy and the Arun Green Infrastructure Study has been taken into account to improve off road cycle routes and plug gaps in provision. If this site is incorporated into the masterplanning process, then this can be achieved more easily.

The following policies in the NP should also be considered and addressed through the application:

Policy GA3 - Parking on site for occupants and visitors.

Sustainability

Government Planning policy is to encourage appropriate development in a location that will enable a reduction in the need to travel, particularly by private car and that planning should contribute to reduce emissions and reduce climatic change. The proposed development is considered to be sustainable due to the proximity to essential facilities and future provision of facilities.

As well as the relevant national and local plan policies, the following NP policies relating to sustainability should also be taken into account:

Policy TEL SP1: 'Strategic delivery of telecommunications infrastructure' - requires all new residential development to be designed to be connected to high quality communications infrastructure to ensure that fibre optic and other cabling does not need to be retrofitted. Any development should be planned with fibre connections between the homes and the cabinets in the street to avoid retrofitting.

Policy ES10 of the BENP requires that new development increases the energy efficiency of buildings.

Sustainable Construction

Tackling climatic change is a key government priority for the planning system. Applicants for planning permission should consider how well their proposals for development contribute to the

Governments ambition of a low carbon economy and how well adapted they are for expected effects of climatic change. Applicants should consider provision of renewable energy in the form high level insulation, rainwater harvesting a general minimal energy use, including Carbon Dioxide reduction.

Flooding

Drainage and flooding

The NPPF requires development not to give rise to an unacceptable risk of flooding detrimental to human health or property. There are requirements regarding the submission of a Flood Risk Assessment (FRA) and Sequential test documentation. The relevant requirements for these are dependent upon the designated flood zone that the site is located within. The Environment Agency website details designated flood zones.

The Infrastructure Delivery Plan recognises that the area of prone to flooding due to surface water runoff combined with watercourse blockages and high ground water levels. The Lidsey SWMP undertaken by Southern Water, ADC, EA and WSCC should be used to inform proposals. The Strategic Surface Water Management Study findings (Stage 2) identifies key constraints and opportunities for the site, as well as suggested solutions.

Any proposed SuDS scheme needs to take into account and demonstrate how it will work within the Masterplan of the BEW development and will fit in with and not prejudice the ability of the rest of the site to achieve a satisfactory drainage scheme, as the first phase of a larger SuDS scheme. The application documents will need to demonstrate this.

Any proposed surface water drainage scheme will need to consider the use of sustainable drainage principles (SuDS).

SuDS Selection

The design will need to follow the hierarchy of preference for different types of surface water drainage systems as set out in Approved Document H of the Building Regulations and the Sustainable Drainage System (SuDS) Manual produced by CIRIA. This means that the developer must first consider the discharge of surface water into an infiltration device (eg. soakaway, basin, swale, permeable paving etc) before considering any other method.

The SuDS design needs to be an integral to the scheme within the private and public areas of the site. In the private areas features can include green roofs, permeable driveways and parking area, soakaways and water harvesting and storage features. SuDS can also be incorporated into public open spaces and roads and should be designed to accommodate and enhance biodiversity as well as providing amenity for local residents, whilst allowing for a safe environment (e.g. avoiding SuDS ponds close to children's play areas).

Should any part of the site use areas of the POS for SUDS across the development, then these need to have consideration made as to the full implication of these regarding suitability within these open areas and implications regarding their future management and maintenance. The recommendation that these are subject to RoSPA or similar organisation inspection should be noted. Indication must be provided as to whether these are likely to be wet or dry areas; this has implications where situated near to residents and play areas. Where they are to remain wet for long periods their safety in must be assessed regarding the close proximity to residential areas. Any such SUDS features including swales, wet balancing ponds, reed beds and wetland areas should be designed as beneficial wildlife, amenity and landscape features as incorporated as part of an open space or landscaping scheme for the development.

Infiltration Drainage Design

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE 365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 30% on stored volumes, as an allowance for climate change. Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Soakage test results have been provided and suggest that soakage will be feasible in this location.

Any SUDS or soakaway design will need to include adequate groundwater monitoring data to determine the highest winter groundwater table in support of the design (monitoring required between October and March). Soakaways should not extend down beyond the highest recorded winter groundwater level. Please note that a high water table is expected in this area.

Supplementary guidance notes are also available on the Arun District Council website.

Maintenance details for all surface water drainage features will be required, including type and frequency of maintenance and the responsible party.

Ditches/watercourses (open or piped), on or adjacent the site are to retain a three metre easement from the top of each bank, ensuring all obstructions including fences are omitted from the easement. The applicant should seek to remove any existing culverts that may exist and reinstate as open watercourses. All ditches and watercourses on or adjacent the site to be maintained in accordance with riparian responsibilities. Any ditch/watercourse crossings or diversions would first need approval and require land drainage consent.

As this site is part of the wider allocation, the drainage solution also needs to be 'joined up' and comprehensively planned across the site.

In relation to foul drainage, early discussions should take place with Southern Water as the capacity of the foul drainage infrastructure in this area has known issues, in addition to the capacity of Lidsey Treatment Works is also severely limited.

Listed Building

In considering whether to grant planning permission for development that affects a listed building or its setting, the Council shall have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

There are listed buildings located within Church Lane and Eastergate Conservation Area within 1km of the site which need to be considered.

Conservation Area

In considering whether to grant planning permission with respect to any buildings or other land in a Conservation Area, the Council shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area (Section 72 of the Planning (Listed Buildings and Conservations Areas) Act 1990). The proposed development needs to assess any impacts on the Church Lane and Eastergate Conservation Area.

Protected Trees

Planning policies seek to protect the environment and avoid damage to protected trees. The

Landscape Appraisal identifies that there is a TPO on an adjoining site but none within the site boundary. A Tree Survey will be required to identify if there are any trees within the site worthy of retention and protection and schemes designed to retain them. Policy ES10 of the BENP seeks to retain ancient trees or trees or hedgerows of good arboricultural and amenity value.

Open Space Provision

A well designed scheme is required to incorporate well thought out areas of open space, existing landscape features such as mature trees and hedgerows, appropriate new planting, provision of children's play area/s and car parking, and a mechanism for long-term management of the developing landscape. It is vital that the landscape scheme maximises the biodiversity of the site by the inclusion of native species and retention of a variety of habitats. This provision will take the form of informal open space, children's play space. In some cases for smaller scale developments, a commuted payment may be appropriate. The landscape scheme should maximise the biodiversity of the site with the inclusion of native species and the retention of a variety of habitats where possible.

A clear indication of the proposed future management of the open space must be provided. A clear directive of responsibility should be set out with this statement explaining how the differing typologies will be maintained ie responsibility of public open space and children's play areas.

Strategic development of this size (the wider allocation) will require detailed consultation with Arun District Council and a masterplan to incorporate children's play, plus landscaped open space (including a range of informal recreation opportunities) plus formal pitch provision.

Light Pollution

Planning policies emphasise the need to consider the impact of light on neighbouring uses and wider landscape, light levels should be the minimum required for security and working purposes, and minimise potential glare and spillage. The proposal is within the wider visual setting of the South Downs National Park, which was designated as an International Dark Night Skies reserve in May 2016. Whilst the proposal is outside the boundary, development on rural areas close to the SDNP should minimise the light glare and spillage from the development. Policy QE DM2 of the eALP also requires consideration of the degree to which outdoor lighting can be powered by on-site renewable sources. The amount of lighting required for the 'green' areas of the site needs to be designed carefully, particularly on the southern edges of the site, where it is adjacent to open countryside. Light pollution intrudes upon intrinsically dark landscapes and the tranquillity of a place and can also have a negative impact on the ecology of an area.

The proposal is likely to be acceptable in terms of light subject to details being satisfactory.

Noise Pollution

Local Plan policies emphasise that noise sensitive development will not be permitted if its users would be affected by noise by proposed noise generating uses. The proposal is close to the existing road and, depending on the finalisation of the route, close to where the re-aligned A29 is proposed. This needs to be considered and addressed if necessary.

Contamination

Development on or close proximity to hazardous sites or contaminated land will be permitted provided the Council is satisfied that appropriate remedial measures can be or have been undertaken in respect of human health and groundwater.

Infrastructure Provision

The Council will seek fair and reasonable contributions to be made by the landowners or

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developers towards the cost of infrastructure, service or amenity provision, to meet the needs of the occupiers or users of the development. This proposal would generate a requirement in the form of infrastructure provision for County education services, social services, fire service and public open space provision. Details of the required County service provision can be found on the West Sussex County website. The proposal is likely to be acceptable subject to the completion of a Section 106 legal agreement.

Primary care:

The current Infrastructure Delivery Plan (IDP) for the emerging Local Plan states that based on 2,000 to 3,000 dwellings the existing plans for expansion at the Croft surgery may need to be considered. The BEW site, when combined with Fontwell would result in a doubling of patient volumes which cannot be supported without revised planning for greater development levels.

Education:

The IDP recognises that there is pressure for primary school places at Eastergate, Aldingbourne and Barham. It identifies that new primary school provision of 2FE expandable to 3FE (based on 2,000 dwellings) or 3FE expandable to 4FE that would more likely be delivered in the form of 2 x 2FE primary schools (based on 3,000 dwellings). Cumulative pressure on secondary could result in the need for a 2FE (£8 to £12 million) expansion (2,000 dwellings) or 3-4 FE (£12 - £16 million) expansion (3,000 dwellings).

Libraries:

Development of 2,000 dwellings would require a Tier 7 facility with a larger facility needing to be considered for 3,000 dwellings.

Consideration should also be given to the need for indoor sport / community centre provision in relation to this site as part of the wider site and this should be within the same building. Confirmation will be required that this scheme is to contribute proportionately to this.

As set out in the transport section, the proposal needs to clearly demonstrate how it will contribute to the required infrastructure provision, as a stand-alone scheme and as a phase of a larger strategic development.

Sports pitches:

As part of a larger strategic allocation, the Playing Pitch Strategy identifies the future need for pitch provision for the projected population increase within the District. The proposals for pitch provision needs to be flexible with the opportunity to revise the pitch layout to be able to accommodate a greater number of smaller pitches ie junior and mini soccer pitches (identified as current shortfall) rather than senior pitches when and if the demand arises.

Indoor leisure/sports community facilities contributions may be required where such a need can be demonstrated.

Biodiversity

Planning Policies and Central Government Advice indicate that developments should aim to maintain and enhance, restore or add to biodiversity and geological resources of the area. An ecological report will need to be submitted setting out the biodiversity present, how biodiversity impacts can be avoided, appropriate mitigation measures and if necessary, compensation measures in the absence of mitigation and how biodiversity gains can be made. All ecological surveys need to be undertaken by a suitably qualified ecologist and at the right time of year and

for the right duration.

Wildlife and increased biodiversity areas along with ecological enhancements should be an intrinsic part of the plans and will provide additional new habitat. Measures to enhance biodiversity as part of the masterplan design should be made. Consideration should be given also to the integration of these with the development as a whole. All nature conservation features within the development site including existing habitats, watercourses and other features should be incorporated into the site design and protected from change.

Protected Species

Development will need to avoid impacts on protected species on a site such as this, and where this is not possible, mitigation or compensation will be necessary. The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. If there is a possibility that a development proposal will impact on a protected species, surveys will need to be submitted with a planning application to determine the presence or absence of a protected species upfront with a planning application and will not be a condition of a planning permission if granted since their presence is a material consideration that will need to inform decisions. If planning permission is granted, a licence, a development licence or conservation licence, from Natural England may be required. All ecological surveys need to be undertaken by a suitably qualified ecologist and at the right time of year and the right duration.

Crime

Planning policies encourage quality design, layout, landscaping and lighting of new development to help reduce the risk of crime. The proposal is likely to be acceptable subject to the detail of the design reflecting the principles for designing out crime. The greenspace areas need to have sufficient natural surveillance to make them feel safe.

Landscape

Planning policies and Central Government advice emphasise that the conservation of the natural beauty of the landscape and countryside should therefore be given great weight in development control decisions.

Comprehensive LVIA and character assessments would need to be detailed and issued for approval. Forming part of the application and prior to any consent being given a full landscape scheme should be submitted for approval, detailing species choice, position, densities and size at time of planting. This should be plotted in plan and list form and in relation to the trees and vegetation to be retained in the locale, so that a clear picture of the proposals can be seen. These details are required to assure the adjacent land setting is maintained, the setting is uncompromised and the proposals are appropriate to their setting.

Long term management of the developing landscape would need to be considered. The landscape scheme should maximise the biodiversity of the site with the inclusion of native species and the retention of a variety of habitats.

As part of any approval a management plan would also be sought for the forward maintenance of the public open space, detailing regime and responsibility. Once responsibility were established maintenance contributions through 106 monies may be sought if provision were to be through the Local Authority District provider.

There is a requirement for any scheme, in accordance with policy to be of High Quality Design, the nature and usage of this development should not compromise this requirement. The emerging landscape design aims should be:

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- To design and implement a scheme that reflects and incorporates elements of its surroundings and enhances the atmosphere of local distinctiveness.
- To create a visually pleasing and interesting landscape for owners, employees and visitors to the development.
- To enhance the landscape quality of the site when viewed from the surrounding area.
- To provide a planting scheme that includes native species to blend with the surrounding location, enhance biodiversity and create enhanced wildlife corridor opportunity.
- To provide a sense of flow and cohesion between the different elements of the landscape, buildings, open areas and surrounding environment.

Forming part of the application, a full landscape scheme should be submitted for approval, detailing species choice, position, densities and size at time of planting. This should be plotted in plan and list form and in relation to the trees and vegetation to be retained so that a clear picture of the proposals can be seen. These details are required to ensure that appropriate screening is provided, maintaining and uncompromising the setting and ensuring that the proposals fit within the area of neighbouring properties, providing screening as required, whilst benefiting the potential of the proposed developments usage.

LVIA viewpoints from public footpaths and adjacent areas have been included, however further reaching viewpoints particularly those from the SDNP to the north of the development should be considered and included. Masterplan Landscape assessment should include photomontages to assist with the assessment of the height and massing of the proposals, as well as summer and winter views. The submitted Landscape and Visual Appraisal document concludes that the site as a whole is developable as part of the wider allocation, but that only the central part of the site would be suitable for development if the site were a stand alone scheme. The Appraisal also identifies the constraint if integration with the wider strategic layout. The other recommendations of the Appraisal in the 'landscape opportunities' section, also reflect the need for open space, SuDS and landscaping to link with and be in keeping with, the development of the wider site.

Existing trees or vegetation that fall within the proposed or periphery of the development, may provide significant aesthetic impact to the location. The trees and vegetation along the western and southern boundaries, which adjoin neighbouring properties will provide potential valuable screening and should be protected and retained.

Any considered tree works within the site should be agreed with Arun District Councils Tree Officer. Further information concerning the existing hedges across the site and proposed TPO for worthy trees will need to be provided. A tree condition survey of the application site to be provided to highlight the importance of retaining particular trees along with the condition of existing hedgerows locally and their contribution to the landscape should be included. Root protection Areas (RPA) from the tree cover clearly seen to the periphery and in several locations of the site should extend into the development site. Before construction, a tree protection scheme must be in place for these adjacent trees whose root protection areas fall within the construction zone from neighbouring land. This would be required for both construction and heavy vehicle movements for deliveries. This should be in accordance with BS 5837:2012 'Trees in relation to construction'

Archaeology

Archaeological remains are a fragile and finite resource. The Council has set out in detail policy within a Supplementary Planning Guidance "Archaeology" adopted September 2003 which is available on the Council's website. Permission will not be granted for development that would be harmful to the significant archaeological interest of the site. An archaeological watching brief condition is recommended.

A site of this size located as it is on the coastal plain is bound to contain deposits relating to past settlement. In the circumstances it would be reasonable to expect to see a desk-based

assessment of the archaeological potential prior to determination followed by an investigation of the site in order to establish what deposits might be threatened and how to mitigate this

The proposal is likely to be acceptable subject to appropriate conditions.

Conclusion

Based on the above comments I conclude that were an application for planning permission to be submitted as a stand-alone scheme, permission would likely be refused. However, if the site is included as part of the masterplanning for the strategic allocation and it can be demonstrated how it has been comprehensively planned and in accordance with a masterplan endorsed by the Council, including ensuring that infrastructure contributions are proportionate (based on the allocation requirements), then permission would be granted. The phasing of this part of the site needs to link up with the areas directly adjacent to the east and west of the site. Whilst there is an existing access to the site, this may not be the best solution when considered as part of the masterplanning exercise. The re-aligned A29 may become the preferable route for a new access into this parcel of land - as multiple new accesses onto the Barnham Road close to where the re-aligned A29 will cross should be avoided. Another consideration is that the precise alignment of the A29 has not been confirmed and any development that restricts the options needs to be avoided.

Follow Up Meeting

If you require a follow up meeting to discuss this pre-application and advice, you will need to forward a written request together with a fee for £200 made payable to Arun District Council.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will need to submit the following documentation/information with your application to meet the National Validation Requirements:

Fully completed and signed Application Form with full description of the proposal.
Ownership Certificate and Agricultural Land Declaration
Design and Access Statement
Correct Fee
Location Plan (1:1250)
Site / Block Plan (1:500)
Elevations (Existing and Proposed)
Floor Plans (Existing and Proposed)
Roof Plans

Additionally the following documents will need to be provided to meet the Local Validation Requirements:

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked though the Local Validation Requirements List, I would suggest that the following additional documents will be required:

Affordable Housing Statement
Biodiversity Survey and Report

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Flood Risk Assessment
Foul and Surface Water Drainage Statement
Landscaping Visual Impact Assessment and Landscape Strategy
Planning Application Summary
Transport Assessment/ Travel Plan
Tree Survey and Arboricultural Report
Lidsey Foul Water Treatment Catchment Area Statement and possible Environmental Assessment
Historic Environment Record Search
Heritage Statement

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NC' followed by a flourish.

Neil Crowther
Group Head of Planning

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