

Land at Bilsham Road, Yapton

Planning Statement (including Affordable Housing Statement)

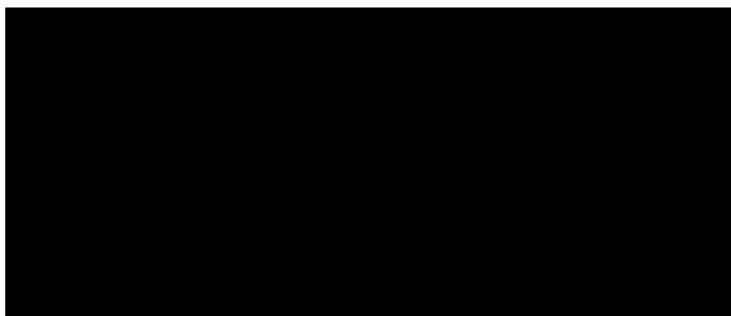
on behalf of Gleeson Strategic Land

December 2017

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Appendices

Appendix 1: Scoping Request

Appendix 2: Scoping Opinion

1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Gleeson Strategic Land ("the Applicant") in support of an outline planning application, with all matters reserved other than principal access to the highway, submitted to Arun District Council ("ADC") for the following:

"Outline application for the development of up to 250 residential dwellings (Class C3), vehicular access, public open space, ancillary works and associated infrastructure" ("the Proposed Development")

on

"Land at Bilsham Road, Yapton" ("the Site").

Application Documentation

- 1.2 The following documentation is submitted for approval as part of the planning application:

- i. Application Form / Certificates
- ii. Site Location Plan (Ref: 1244G.01)
- iii. Parameter Plan (Ref: 1244G.02)
- iv. Proposed Access (Drawing no. B2132 14-111/003 Rev B)

- 1.3 The above should be read in conjunction with a range of technical documents and supporting material as follows:

- i. Planning Statement (including Affordable Housing Statement)
- ii. Planning Application Check List
- iii. Design and Access Statement
- iv. Statement of Community Involvement
- v. Arboricultural Impact Assessment
- vi. Arboricultural Survey
- vii. Archaeological and Built Heritage Desk-based Assessment
- viii. Preliminary Ecological Assessment
- ix. Bat Survey
- x. Bird Survey

- xi. Reptile Survey
- xii. Ecology check list
- xiii. Phase 1 Geo-Environmental Desk Study
- xiv. Transport Assessment
- xv. Residential Travel Plan
- xvi. Flood Risk Assessment and Drainage Strategy
- xvii. Landscape and Visual Appraisal
- xviii. Agricultural Land Classification
- xix. Illustrative Detailed Masterplan (Drawing no. 1244G.03)
- xx. Strategic Allocation SD7 Illustrative Masterplan (Drawing no. 1244.04).
- xxi. Education Requirement Analysis

Environmental Impact Assessment

- 1.4 Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") identifies that an Environmental Impact Assessment ("EIA") is only required where an urban development over 5ha in size or more than 150 dwellings is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.5 On 26th June 2017 Nexus Planning submitted an EIA screening request to the Council pursuant to the EIA Regulations (**Appendix 1**) relating not just to the Proposed Development but in fact to the development of the Yapton SD7 allocation as a whole which includes the adjacent land to the west. This demonstrated that the development of the Yapton SD7 allocation, taking into account its characteristics, location and potential impact – is not such as to give rise to likely significant effects on the environment.
- 1.6 On 28th July 2017, the Council adopted a Screening Opinion (**Appendix 2**) which determined that the development of the Yapton SD7 allocation (and as a consequence the Proposed Development which forms just part of this) is not likely to give rise to significant environmental effects and that an EIA is not required.

Community Engagement

- 1.7 The Arun Statement of Community Involvement (April 2012) states in Section 8 that:

"The need for wider involvement of the community and stakeholders at an early stage in the development management process is of benefit to the public, local groups and organisations, developers and local authorities. The Statement of Community Involvement is an important tool for involving the wider community on all planning applications."

- 1.8 A Statement of Community Involvement accompanies this application and summarises the public consultation that has taken place to inform the principles for the Yapton SD7 allocation as a whole and, as part of this, the Proposed Development. Most notably, a presentation was given to Yapton Parish Council on Monday 18th September 2017 and a public exhibition was held at Yapton and Ford Village Hall on Monday 25th September 2017.
- 1.9 Pre application meetings with the Council have also taken place including an initial meeting on 8th August 2017 and a subsequent meeting on 1st December 2017. The responses received from the Council to date have not identified any issues that are not addressed in this application.

Yapton SD7 Planning Applications

- 1.10 As set out in further detail in Section 2 of this Statement, the Site forms part of the wider Yapton SD7 allocation in the emerging Arun Local Plan. The Applicant has, and continues to, work closely with the promoters of the remainder of the wider allocation and we understand that a separate planning application is due to be submitted imminently on this land. In order to provide the Council with comfort that the Proposed Development would not in any way prejudice the delivery of the remainder of the allocation, an illustrative 'allocation-wide' masterplan has been prepared and forms part of this application. Whilst not for formal approval at this stage, this plan demonstrates how the allocation can be delivered. Furthermore, the submitted Design and Access Statement clarifies clearly how robust design principles have been established for the SD7 allocation as a whole, and how the Proposed Development draws from / fits into these.

2.0 The Site / Site Context

- 2.1 The Site comprises approximately 11.6 hectares and is located on the southern side of the settlement of Yapton, adjacent to the existing settlement boundary. It comprises three large agricultural fields with mature hedgerows and trees dividing the individual field boundaries. The Site is predominantly flat with an 'L' shape section extending west from Bilsham Road, and a larger more regularly-shaped parcel located to the south of Tack Lee Road.
- 2.2 Existing residential development borders the Site to the north and east. There is an existing agricultural access to the Site from Bilsham Road.
- 2.3 There are no listed buildings within the Site although there are some Grade II listed buildings within the existing Yapton urban area, to the north of the Site.
- 2.4 The significant majority of the Site is located within Flood Zone 1 i.e. the lowest risk of flooding. A small part is located in Flood Zone 2 although as set out elsewhere in the application documentation, no housing is proposed within the floodplain.
- 2.5 As noted previously, the Site forms part of the wider emerging Yapton SD7 allocation which extends west to Drove Lane (see Section 5 for more detail).

The Surrounding Area

- 2.6 The settlement of Yapton contains a range of services and facilities which include a Village Hall, primary school, two nurseries, two doctors surgery, convenience store and other day-to-day services. All of these are within reasonable walking distance of the Site. Yapton is recognised as one of the most sustainable locations for development in the District.
- 2.7 Barnham railway station is located approximately 2.4km to the north west and Ford railway station is approximately 4.5km to the north east. Both stations provide access to regular services across the south coast (including Portsmouth, Bognor Regis, Brighton and Littlehampton) and to London Victoria.
- 2.8 Yapton is served by two bus services that run along Bilsham Road (opposite Lambs Cottages). The 141 service and the 700 Coastline both run from Yapton to Bognor Regis every 20 minutes.

- 2.9 There are two doctors' surgeries within Yapton - the Avisford Medical Group and the Croft Practice. Both have confirmed that they are accepting new patients.
- 2.10 Yapton has a primary school and two pre-schools, both of which are located within 600m of the Site. There are existing secondary schools in Barnham, Littlehampton and Bognor Regis - all of which are accessible via public transport.

Planning History

- 2.11 There is no relevant planning history for the Site.

3.0 The Proposed Development

- 3.1 The Proposed Development seeks outline planning permission for the delivery of up to 250 dwellings. All matters are reserved for future determination other than the principal means of access to the highway from Bilsham Road.
- 3.2 The general arrangement of the Proposed Development is set out on the Parameter Plan which identifies the following primary components:
- Residential development – up to 250 dwellings;
 - green infrastructure located across the Site including an area of land which could be used as allotments and possibilities for new public parks or greens with children’s play facilities;
 - principal access to the highway from Bilsham Road; and
 - the potential for a vehicular connection with the land to the west (the remainder of the Yapton SD7 allocation). When both elements of the SD7 allocation are delivered, this would create a new vehicular link from Bilsham Road to Yapton Road
- 3.3 The application is supported by an Illustrative Masterplan, which demonstrates how 250 homes could be accommodated on the Site, together with an illustrative ‘allocation-wide’ masterplan which shows how the Proposed Development fits within, and does not prejudice, the delivery of the remainder of the Yapton SD7 allocation.

Market and Affordable Housing Statement

- 3.4 The Proposed Development will provide up to 250 residential dwellings of which it is proposed that 30% would be affordable (up to 75 dwellings).
- 3.5 We note from pre-application discussions that the Council’s Housing Strategy and Enabling Manager has requested a tenure mix for affordable housing of 75% rented and 25% intermediate housing (which accords with the relevant policy of the emerging Local Plan).
- 3.6 As this is an outline application, with all matters reserved other than principal access to the highway,

the layout of the Site is yet to be determined. Accordingly, the location and precise mix of the affordable homes would be agreed at the reserved matters stage. However, it is expected that the quantum of affordable housing to be delivered, the tenure mix and an indicative affordable mix, will be secured through a Section 106 Agreement secured at the outline stage.

- 3.7 Whilst not for approval at outline stage, in order to demonstrate the ability for the Site to suitably accommodate the maximum number of homes applied for, the indicative masterplan has been based on the comments received from the Council during the pre-application process.

5.0 Development Plan Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires all planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The development plan for Arun District currently comprises the following:
- i. the 'saved policies' of the adopted Arun District Local Plan (2003); and
 - ii. Yapton Neighbourhood Plan.
- 5.3 The Site is not allocated for development in the adopted Local Plan but this document is out of date on the basis that:
- i. it makes no provision for housing beyond 2011 and is, therefore, time expired;
 - ii. it pre-dates the NPPF and does not seek to establish the objectively assessed housing need ("OAN") for the District, contrary to the requirements of paragraphs 14 and 47 of the Framework;
 - iii. the built up area boundaries / areas of countryside upon which Policies GEN2 and GEN3 rely were drawn based on development needs as they were understood when the Local Plan was adopted in 2003 rather than the needs of today; and
 - iv. the agreed lack of a 5 year housing supply means that, having regard to paragraph 49 of the NPPF, policies for the supply of housing should be considered out of date.
- 5.4 It is also the case that Policy GEN3, which seeks to protect the countryside for 'its own sake', is inconsistent with the NPPF, which adopts a more nuanced approach that seeks to take account of the different roles and character of different areas, seeking to protect and enhance 'valued' landscapes (paragraph 109 of the NPPF). Policy GEN3 must also carry significantly reduced weight on this basis having regard to paragraph 215 of the NPPF.

Yapton Neighbourhood Plan

- 5.5 The Yapton Neighbourhood Plan ("YNP") was made in October 2014. At the time that the YNP was drafted (and subsequently made), the emerging Local Plan advanced the position that the OAN for housing in the District was just 580dpa. Of this, Policy HSP1 proposed a minimum figure of 100 dwellings for Yapton. The YNP makes provision, in approximate terms, for this level of housing.
- 5.6 Policy BB1 states that development at Yapton will be focussed within the built up area boundary. However, it specifically allows for development outside boundary where it would accord with one of four exceptions identified in the policy. Of particular note, the third exception is where such development would relate to additional allocations for housing land in accordance with Policy H1 of the YNP. Policy H1 confirms that the minimum housing requirement for Yapton in the period 2014- 2029 will be established through the emerging Arun Local Plan and that an additional buffer of 20% over and above this will be permitted to allow for flexibility and consumer choice. This policy therefore allows for additional allocations if the emerging Local Plan requires it. As such, the Proposed Development, which forms part of a housing allocation required by the emerging Local Plan to meet the OAN for the District, complies with Policy H1 and, therefore, Policy BB1 of the YNP. The Council has confirmed this in its draft pre-application response received on 1st December 2017.

Other Material Considerations

Emerging Arun Local Plan 2011-2031

- 5.7 The emerging Local Plan was submitted for examination in 2014, and examination hearing sessions took place between January 2015 and September 2017.
- 5.8 Emerging development plans are material considerations in the determination of planning applications (paragraph 216 of the NPPF) with the weight to be attached to them increasing, inter alia, as they progress through the Local Plan process.
- 5.9 The Site forms part of strategic allocation 'Yapton SD7' as identified in the emerging Local Plan, and Policy H SP2c states that:

“Located to the south west of Yapton development proposals in the Strategic Allocation will provide at least 400 dwellings over the plan period. Development proposals must comply with the following key design and infrastructure requirements;

- a. Provide a one-form entry primary school and nursery places;*
- b. A new library facility;*
- c. Improvements to the A259 between Climping and Littlehampton; and*
- d. Contributions towards new healthcare facilities which will be incorporated at Ford (SD8).*

5.10 Following the examination hearing sessions the Local Plan Inspector published his ‘Interim Findings’ in October 2017. He raised no issues with the principle of the SD7 allocation. Furthermore, he asked the Council to consider the need for a primary school on site and, on the assumption that a primary school was required, directed it to amend the policy to refer to the delivery of ‘at least 500 homes’ on the basis that it was evident that the reference to 400 homes was based on a mis-calculation of the relevant site area.

5.11 The Council endorsed on 21st November 2017, for submission to the Inspector, a series of proposed Main Modifications. Surprisingly, this does not propose to amend the capacity of the allocation as directed by the Inspector. It does, however, propose to amend criteria a) and b) of the policy as follows to provide greater flexibility in terms of the provisions for education and library provision:

- a. Provide a one-form entry primary school and nursery places if the need is generated for such facilities either on-site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facilities;
- b. a new Tier 7 library facility to meet identified local need either on site, or by making a contribution towards new facilities or the improvement or expansion of the relevant existing facility.

National Planning Policy Framework 2012 ("NPPF")

5.12 The NPPF sets out the Government's planning policies and how these are expected to be applied. It identifies at paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development. It identifies at paragraph 7 that there are three dimensions to sustainable development: economic, social and environmental and that the planning system must therefore perform a number of roles:

- i. An economic role – contributing to building a strong, responsive and competitive economy;
- ii. A social role – supporting strong, vibrant and healthy communities; and
- iii. An environmental role – contributing to protecting and enhancing our natural, built and historic environment.

5.13 We assess in detail later in this Statement, the accordance of the Proposed Development with the provisions of the NPPF. However, we summarise below, with reference to the three roles identified in the NPPF, how the Proposed Development would contribute to the achievement of sustainable development:

Sustainable Development	Benefit of the Proposed Development
An economic Role	• A significant capital investment in the local area; • Increased spending by new residents in local shops, restaurants, businesses and other services; • New housing to underpin existing and support new economic activity; • Provision of direct and indirect construction jobs
A Social Role	• Up to 250 new homes, including much-needed affordable housing • A high quality physical environment with green infrastructure that will provide opportunities for social

	interaction; Through establishing a high quality framework for good detailed design, a reduction in the fear of crime, opportunities for crime and anti-social behaviour
An Environmental Role	- Establishing a robust framework for high quality detailed design that reinforces local character and distinctiveness - New green infrastructure and open space

5.14 Importantly, paragraph 14 of the NPPF is clear that development that accords with the development plan should be approved without delay.

National Planning Practice Guidance (2014)

5.15 On 6th March 2014, the government published the National Planning Practice Guidance ("NPPG"). The NPPG is a live document that is actively updated to ensure that it remains up to date.

5.16 The NPPG is divided into different topic areas, which provide advice and guidance to inform the understanding and approach to implementation of the NPPF. This will be referred to as appropriate later in this Statement.

Housing Implementation Strategy (March 2017)

5.17 Recognising the chronically low housing land supply position in the District, the Council's Local Plan Sub Committee (December 2016) agreed to adopt a strategy to seek to address this as best it could in the short term. Part of this strategy included an agreement to invite planning applications immediately on identified HELAA sites, as well as possible first phases on sites included in the emerging Local Plan as strategic site allocations. The submission of this application accords with this strategy.

5.18 In March 2017 the Council published a 'Housing Implementation Strategy' ("HIS"), an evidence base document that seeks to support / explain the Council's position on housing in the emerging Local Plan. Section 5 of the HIS is entitled 'Boosting supply in the short term' and, consistent with the agreement of the Sub-Committee in December 2016, recognises the housing land supply

shortfall in the District. Paragraph 5.2 of the HIS confirms that the Council has adopted a strategy:

“... to invite planning applications immediately on identified HELAA sites as well as possible first phases on sites included in the Plan as Strategic Sites Allocations. Whilst it was never expected that this would address all of the short term issues, it was considered to be essential in ensuring that the Council was looking at all options in increasing housing supply in the short term”

5.19 The Site forms part of the Yapton SD7 allocation and would deliver up to 250 residential units. As referenced previously, the Local Plan Inspector has taken no issue with the principle of the allocation, seeking primarily to ensure that the Council allocates it for a higher level of housing (at least 500 homes). The submission of this application therefore accords with the allocation in the emerging Local Plan, and the Council’s adopted HIS strategy, and its timely approval is essential in increasing housing supply in the short term.

6.0 Assessment of the Proposed Development

6.1 In this Section of the Planning Statement we assess the Proposed Development against the relevant planning policies having regard to the following key issues as identified in the NPPF:

- i. Principle of development;
- ii. Building a strong competitive economy;
- iii. Delivering a wide choice of high quality homes;
- iv. Promoting sustainable transport;
- v. Requiring good design;
- vi. Promoting healthy communities;
- vii. Meeting the challenge of climate change, flooding and coastal change;
- viii. Conserving and enhancing the natural environment;
- ix. Conserving and enhancing the historic environment.

6.2 On the basis that the adopted Local Plan is as a matter of fact out of date, as accepted by the Council, and given that the emerging Local Plan has progressed through the relevant examination hearing sessions and the Inspector has already produced 'Interim Findings' (which raise no issues as to the principle of the Yapton SD7 allocation), we focus only the compliance of the proposals with the policies of the emerging Local Plan and the Yapton Neighbourhood Plan (together with general consistency with the NPPF).

Principle of Development

6.3 Paragraph 14 of the NPPF identifies that at its heart is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. For decision taking this means:

- i. approving development proposals that accord with the development plan without delay; and
- ii. where the development plan is absent, silent or relevant policies are out of date, granting permission unless:

- a. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - b. specific policies in this Framework indicate development should be restricted.
- 6.4 This approach is reinforced at paragraph 187 where local planning authorities are advised that they

'should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible.'
- 6.5 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development.
- 6.6 Policy SD SP1 (Sustainable Development) of the emerging Local Plan sets out that the Council will take a positive approach that reflects the presumption in favour of sustainable development as set out in the NPPF.
- 6.7 As identified previously in this Statement, Policy SD7 H SP2c (Yapton SD7) identifies the Site as part of a strategic allocation that will provide at least 400 dwellings. Representations to that policy, which were discussed at the examination, confirmed that the reference to 400 homes was an error based on the use of the wrong site area. Utilising the correct figures, the case was advanced that the policy should refer to the delivery of 'at least 550 homes'
- 6.8 In his Interim Findings, the Local Plan Inspector raises no issues with the principle of the SD7 allocation.
- 6.9 In terms of its overall capacity, he stated that:

"...On the assumption that the provision of a one form entry (1FE) primary school remains a requirement of the allocation then the policy should state 'at least 500 homes'
- 6.10 This is a clear direction to the Council in terms of an expected Main Modification. We are aware that the Council has considered this issue and has taken that view that the policy can remain unchanged in terms of the identified capacity as it refers to a minimum rather than a maximum

figure. Whilst true, it is also the case that this does not accurately reflect the capacity of the allocation, is confusing for members of the public and other stakeholders and, importantly, is contrary to the Inspector's direct instruction. As such, it is evident that the appropriate capacity of the allocation as a whole is a minimum of 500 homes. As demonstrated in this application, the Proposed Development would deliver up to 250 of these homes in a way that responds appropriately to the Site's constraints and opportunities. As such, the principle and scale of the Proposed Development is accepted by the Council and endorsed by the Local Plan Inspector.

- 6.11 We have addressed in the preceding section of this Statement how the Proposed Development also accords with the policies of the YNP, a position endorsed by the Council in its pre-application response.

Building a Strong Competitive Economy

- 6.12 Paragraph 18 of the NPPF states that planning should operate to encourage and not act as an impediment to sustainable growth. As such, great weight should be placed on the need to support economic growth through the planning system. Paragraph 23 of the NPPF recognises the essential contribution that residential development can provide in ensuring the vitality of centres.
- 6.13 The emerging Local Plan (Policy EMP SP1) advises that the Council will promote sustainable growth to meet the varying needs of different economic sectors and to support regeneration within the two main towns. Policy SD SP1a outlines that the Council will provide for the economy by identifying existing sites of important employment use and allocate land to meet the future needs of the district.
- 6.14 The Yapton Neighbourhood Plan supports the NPPF objective to build a strong and competitive economy but does not incorporate any specific policies in this regard.
- 6.15 Whilst the Proposed Development would not provide any additional employment land (this is provided on sites elsewhere in the District), the construction of the development would contribute to the local economy, generating a range of jobs. Paragraph 7 of the document entitled 'The Economic Footprint of UK House Building' published in March 2015 by the HBF confirms that as an average across the housebuilding industry, 1.5 direct full time jobs are

created per dwelling. As such, the Proposed Development would generate 375 direct jobs. In addition, the report highlights that recent studies have identified that for every 1 direct job created, 0.5 indirect jobs in the supply chain area created. As such, the Proposed Development would create an additional 125 indirect jobs – a total of 500 jobs overall.

6.16 In addition, the Proposed Development would result in an increased population which will help to support local businesses, facilities and services. The ONS Family Spending Report (2015) identifies that total average weekly household expenditure 2014 was £531.30. In total, the direct expenditure for 250 households would amount to approximately £6,906,900 per annum gross (£531.30 x 250 homes x 52 weeks). A proportion of this would of course be in Yapton specifically.

6.17 The additional spend is significant, and would help support the long term vitality and viability of the Arun District economy and of Yapton itself.

Delivering a Wide Choice of High Quality Homes

6.18 Paragraph 50 of the NPPF states that in order to deliver a wide choice of high quality homes, local planning authorities should plan for a mix of housing based on current and future trends, market trends and the needs of different groups in the community.

6.19 Policy H2 of the Yapton Neighbourhood Plan states that for developments of fifteen units or more a mix of dwellings must be provided within the following ranges:

Dwelling type	Percentage of units
1 bed dwellings	10 – 15% of all dwellings
2 bed dwellings	25 – 25% if all dwellings
3 bed dwellings	45-55% of all dwellings
4 + bed dwellings	5 – 10% of all dwellings

- 6.20 The emerging Local Plan (Policy H DM1) states that developments should provide a mix of dwelling types and sizes to reflect the need of the local area with the provision of affordable dwellings including family-sized accommodation. Emerging Policy D SP1 also requires that development proposals reflect the efficient use of land, layout, landscape and its setting, density, mix, scale, massing, character materials, finish, architectural details and nearby habitats of the site and local area.
- 6.21 The housing mix for the Proposed Development is not something for approval at the outline stage. However, for masterplanning purposes, the submitted plans demonstrate that the Site could accommodate a mix of homes that can accord with the policies of the Yapton Neighbourhood Plan and the emerging Local Plan. The submitted Design and Access Statement provides further information in this regard.

Affordable Housing

- 6.22 Paragraph 50 of the NPPF states that where affordable housing is needed, policies should be provided to meet this need on site, unless off-site provision or a financial contribution can be robustly justified.
- 6.23 Policy AH SP2 of the emerging Local Plan states that for all developments of 11 residential units or more the Council will require a minimum 30% of the total number of units proposed on-site to be provided as affordable housing.
- 6.24 Whilst the Yapton Neighbourhood Plan has no specific policy relating to affordable housing, paragraph 5.17 states that housing schemes of 15+ dwellings should deliver 30% affordable housing.
- 6.25 The Proposed Development will provide 30% affordable housing in accordance with the policies of the emerging Local Plan and the Yapton Neighbourhood Plan, to be secured by a Section 106 Agreement.

Promoting Sustainable Transport

- 6.26 The NPPF states (paragraph 29) that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Paragraph 32 states that developments that generate significant number of trips should be supported by a Transport Statement or Transport Assessment, and that plans and decisions should take into account whether:
- i. opportunities for sustainable transport modes have been taken up depending upon the nature and location of the Site, to reduce the need for major transport infrastructure;
 - ii. safe and suitable access to the Site can be achieved for all people. Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development, and;
 - iii. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 6.27 Policy T SP1 of the emerging Local Plan advises the Council will ensure that developments provide safe access on to the highways network; contributes to highway improvements and promotes sustainable transport. The policy confirms that the Council will support developments supported by an effective and deliverable Transport Assessment which demonstrates that the transport effects of development on the local and strategic road network can be satisfactorily mitigated, and a Travel Plan which is effective and deliverable.
- 6.28 This approach is reinforced by Policy T DM1 which states that new development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport.
- 6.29 The Yapton Neighbourhood Plan has no specific policies on sustainable transport although its text does promote sustainable transport through the use of public transport and non-vehicular modes of transport.
- 6.30 The Proposed Development will take primary vehicular access from a new priority junction on

the B2312 Bilsham Road, which will also feature a new footway and pedestrian crossing.

6.31 In accordance with national and local level policies, a full Transport Assessment ("TA") has been submitted together with a draft Travel Plan outlining how car journeys in the future may be suitably reduced. The TA demonstrates that the Site is sustainable in terms of its accessibility to local facilities via non-car transport modes, and is located within convenient walking distance of bus stops that offer access to services every 20 minutes. Capacity assessments of key junctions in Yapton show that the highway network generally operates within capacity and that the introduction of development traffic will not result in a severe impact. The TA concludes that the Proposed Development is sound in nature and conforms to national and local planning policy with respect to sustainability and traffic impact.

6.32 In addition, it is proposed that the new access road from Bilsham Road extends through the Site and extends to its western boundary. This would then allow it to 'tie in' with the second half of a new road, that would extend from this point north-westwards to Yapton Road, and be delivered as part of development proposals for the western part of the Yapton SD7 allocation. As a consequence, once both developments are completed, a new link road would be delivered from Bilsham Road to Yapton Road, providing an alternative route for cars through Yapton. The Section 106 Agreement for the Proposed Development (and that for the remainder of the Yapton SD7 allocation) should ensure that the point of linkage for this new road is secured and consistent.

Walking/Cycling

6.33 Emerging Local Plan Policy H SP2 identifies that strategic site allocations should integrate appropriately with surrounding communities through connectivity of transport modes, including walking and cycling.

6.34 Whilst the Yapton Neighbourhood Plan does not include any specific policy on walking or cycling it does confirm that it is important for new development to be designed having regard to non-car modes of transport. At paragraph 11.15, it identifies an aspiration to create a dedicated network of cycle paths throughout the village although it recognises that this cannot be comprehensive and should where possible be provided along the main roads.

6.35 The submitted TA confirms that there are several linkage opportunities for pedestrians and

cyclists from the Site to the existing urban area, including along the B2132 and the PRoW from the Millers and Tack Lee Road. This ensures that new residents will have excellent access to an extensive range of amenities within 2km (a realistic walking distance for commuting / school trips, having regard to the Institute of Highways and Transportation guidelines). This includes key facilities such as the primary school, day nursery, doctors' surgery, convenience store and other day-to-day services.

Public Transport

- 6.36 Existing bus services on Bilsham Road provide a regular twenty-minute service to key destinations including Brighton, Bognor Regis and Portsmouth, providing opportunities for travel to work and school by bus. Barnham railway station is situated approximately 2.5km to the north west and Ford Station is located approximately 4.5km to the north east. Both stations provides services across the south coast (including Portsmouth, Bognor Regis, Brighton and Littlehampton) and to London Victoria.

Requiring Good Design

- 6.37 Paragraph 56 of the NPPF identifies that the Government attaches great importance to the design of the built environment and that good design is indivisible from good planning.
- 6.38 Policy D SP1 of the emerging Local Plan advises that all development proposals should ensure that they are of good quality and demonstrate a high standard of design. Furthermore, Policy D DM1 sets out the aspects of design quality that should be considered including:
- i. Character
 - ii. Appearance/attractiveness
 - iii. Impact
 - iv. Innovation
 - v. Adaptability
 - vi. Crime prevention

vii. Trees and Woodland

- 6.39 Paragraph 5.2 of the Yapton Neighbourhood Plan states that the housing need of the village should be achieved through the provision of well-designed dwellings that are sympathetic to the character of the village.
- 6.40 Whilst only outline permission is sought at this stage, a comprehensive Design and Access Statement ("DAS") has been submitted to establish compliance with these policies and demonstrate the creation of a robust and high quality framework for good detailed design at the reserved matters stage. The DAS demonstrates that a set of high quality principles have been established for the development of the Yapton SD7 allocation as a whole, within which specific design and access principles for the Proposed Development have been identified that will create an attractive and sustainable place to live.
- 6.41 In terms of development density, Policy D SP1 of the emerging Local Plan states that development proposals should be good quality and demonstrate a high standard of design. Paragraph 13.2.14 adds that when considering density, thought should be given to proximity of activities, routes and public transport access. Paragraph 13.2.15 requires that density is also sympathetic to a site's surroundings.
- 6.42 The submitted DAS shows that the proposals for the Yapton SD7 allocation as a whole, and the Proposed Development specifically, would deliver a variety of densities ranging from low density (30 to 33 dph) on the western edges of the Site, medium density towards its eastern and southern edges (34 to 37 dph) and a slightly higher density (37 to 40 dph) towards the centre of the Site. These densities seek to make efficient use of the Site whilst responding sensitively and appropriately to its context. The average density for the Site is 22 dwellings per hectare gross, or 36 dwellings per hectare net.
- 6.43 On this basis, this application would provide a framework for the delivery of high quality development at reserved matter stage.

Promoting Healthy Communities

- 6.44 The NPPF (paragraph 73) seeks to promote healthy communities by facilitating social interaction and creating healthy, inclusive communities. This includes the provision of open space, sports and recreation facilities and opportunities for new provision.
- 6.45 Emerging Local Plan Policy GI SP1 requires major development to protect and enhance existing green infrastructure assets to ensure the creation of a joined up green infrastructure network.
- 6.46 The Yapton Neighbourhood Plan (Policy E6) states that proposals that seek to improve the connectivity between wildlife areas and green spaces will be encouraged in order to enhance the green infrastructure of the Parish. There is no specific policy within Yapton Neighbourhood Plan relevant to open space provision.
- 6.47 The green infrastructure strategy adopted for the Yapton SD7 allocation / the Site, as set out in the submitted DAS, is to create a connected network of open spaces, retaining the existing landscape features including trees and hedgerows of merit, with new planting and open spaces proposed to provide a high quality green infrastructure. This approach has focused on creating strong links between areas of natural habitat in the form of wildlife corridors. It has also highlighted opportunities for creating attractive recreational footpaths that link into the wider network. The aim is to create multi-functional open spaces including play areas, an area of potential allotments and new informal open space.

Public Open Space

- 6.48 Emerging Local Plan Policy GEN20 states that residential development is required to provide public open space to the minimum standard of 2.4 hectares per 1,000 people, including appropriate play provision.
- 6.49 The Proposed Development includes approximately 4 hectares of public open space, approximately 35% of the total site area. This open space includes a new local park, informal amenity open space and sustainable urban drainage features. The public open space has been designed to meet the standards as set out in the Arun District Council Final Open Space Standards Paper (September 2016). The table below shows how the Proposed Development in fact exceeds all elements of the Council's open space requirements;

Open Space Category	Requirement as set out in the Open Space Standard Paper (September 2016) ha per 1000	Policy Requirement for 250 dwellings	Proposed Development
Allotments and community gardens	0.25	0.16	0.19
Amenity green space	1.07	0.67	0.74
Natural and semi natural open space	0.5	0.31	2.89
Parks and gardens	0.2	0.12	0.14
Provision for children and young people	0.04	0.02	0.04

Meeting the challenge of climate change, flooding and coastal change

- 6.50 Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided, and paragraph 103 advises that development should not increase flood risk elsewhere.
- 6.51 Policy ECC SP1 of the emerging Local Plan states that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change including flooding. In order to achieve this the policy requires that development is designed to take into account location including the risk of flooding and water efficiency.
- 6.52 In addition, Policy W SP1 of the merging Local Plan states that the Council will support development that is appropriately located, taking account of flood risk and which promotes the incorporation of appropriate mitigation measures, particularly Sustainable Drainage Systems that reduces the creation and flow of surface water.

6.53 Policy E11 of Yapton Neighbourhood Plan states that no development will be permitted which reduces the ability of flood attenuation areas to alleviate flooding.

6.54 This application is supported by a Flood Risk Assessment ("FRA") which confirms that:

- i. the majority of the Site lies within Flood Zone 1, an area of low probability of flooding;
- ii. a narrow area of land is located within Flood Zone 2;
- iii. the proposals have been designed to ensure that all dwellings are located within Flood Zone 1;
- iv. there are no records of historic flooding within the Site boundaries;
- v. the results of soakage testing indicate that infiltrating SuDs features may not be suitable for the site. As such, it is proposed that surface water will be discharged to the river to the south of the Site, via a number of attenuation basins.

6.55 Accordingly, the Proposed Development accords with all relevant policies.

Foul Drainage Strategy

6.56 The Flood Risk Assessment and Drainage Strategy submitted as part of the application confirms that for the western part of the Site, it is proposed to collect and discharge foul flows by gravity to the eastern part of the Site. All foul flows will then drain by gravity to the south west of the Site and will then be pumped in a south-eastern direction into the public foul sewer on Bilsham Road. It is envisaged that the foul flows will then be conveyed to either Lidsey or Ford Wastewater Treatment Works. A request for a foul capacity check for the Site has been requested from SWSL and once received will confirm where the foul drainage for the site will be sent. Discussions with SWSL are ongoing.

Conserving and enhancing the natural environment

6.57 Paragraph 109 of the NPPF states that the planning system should:

- i. Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes;

- ii. Recognise the wider benefits of ecosystem services;
- iii. Minimise impacts on biodiversity and providing net gains in biodiversity where possible;
- iv. Prevent new development from contributing to or being put at unacceptable risk from unacceptable levels of soil, air, water or noise pollution; and
- v. Provide for remediating and mitigating degraded land where possible.

Landscape

- 6.58 The emerging Local Plan highlights the importance of landscape's contribution to the sense of place. Policy LAN DM1 states that development should respect the particular characteristics and natural features of the relevant landscape character areas and seek to reinforce or repair the character in those areas.
- 6.59 An identified 'Objective' of the Yapton Neighbourhood Plan is to protect the existing quality of landscape and encourage biodiversity. As such, developments will be encouraged to minimise their impact on the landscape.
- 6.60 The relationship between existing landscape features, buildings and the Proposed Development have been carefully considered and the proposals have sought to minimise landscape and visual impacts.
- 6.61 A Landscape and Visual Appraisal ("LVA") accompanies this application and concludes that the development would not result in any unacceptable effects on landscape character or visual amenity (as summarised below).

Landscape / Visual effects

- 6.62 The LVA confirms that the Site is not the subject of any national or local level landscape designations.
- 6.63 Direct effects on landscape character result from the change from pastoral / arable land use to housing. This effect would be moderated by the retention of the majority of existing vegetation.
- 6.64 In terms of its immediate context, the LVA identifies that the Site has a 'medium' susceptibility to medium scale residential development, because of its characteristics and settlement edge

location. The Proposed Development will be offset from the boundaries abutting the wider agricultural landscape, resulting in a softer landscape.

- 6.65 In terms of visual effect, the LVA concludes that significant effects on views from public rights of way would be highly localised and restricted to the short sections of footpath running close to the Site. Furthermore, additional pedestrian routes would be created as a result of the Proposed Development to improve the footpath network.
- 6.66 Opportunities for views of the Site are limited by the combined screening effects of trees, hedgerows and the settlement edge. Due to a fairly level topography, there are no opportunities for elevated views of the Site. The number of potential visual receptors is therefore limited, being primarily restricted to residents of adjacent dwellings, users of footpaths leading through the site, users of adjacent footpaths and localised road users.
- 6.67 The consideration of landscape and visual impact must of course be had in the context of the Site's allocation for strategic housing development in the emerging Local Plan i.e. where a change from agricultural to residential use has already been accepted as appropriate.

Impact on Trees and Hedgerows

- 6.68 Emerging Local Plan Policy ENV DM4 advises that land and tree surveys are to be conducted as well as production of a tree constraints plan where there are existing trees on or adjacent to a development site.
- 6.69 Yapton Neighbourhood Plan Policy E4 states that development will be expected to retain well-established features of landscape, including mature trees, species-rich hedgerows and ponds.
- 6.70 There are no trees that are the subject of a Tree Preservation Order located within the Site.
- 6.71 The application is accompanied by an Arboricultural Impact Assessment which concludes that all Category A, B and C trees can be retained by adopting, at reserved matters stage, a layout along the lines of that shown illustratively on the submitted plans.

Ecology and Biodiversity

- 6.72 Paragraph 109 of the NPPF states that the planning system should contribute to and enhance

the natural and local environment by recognising the wider benefits of ecosystems. Development should minimise impacts on biodiversity and provide net gains where possible.

6.73 Emerging Local Plan Policy E3 states that proposals that result in the loss of, or unacceptable harm to, an existing area will not be permitted unless:

- i. proposed mitigation measures would result in an effective solution to ensure that the integrity of the habitat continues after the implementation of the development; or
- ii. the development concerned identifies appropriate measures for the relocation of the existing habitat to an appropriate area within 500 metres of the existing habitat and secures appropriate management arrangements for both the relocation and subsequent monitoring and aftercare.

6.74 Emerging Local Plan Policy ENV1 SP1 encourages the preservation, restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of both designated and non-designated sites. Policy ENV DM5 requires that proposed developments achieve a net gain in biodiversity and protect existing habitats.

6.75 The Yapton Neighbourhood Plan seeks to mitigate impacts from development by protecting the existing quality of landscape and encourage local biodiversity (paragraph 7.1).

6.76 Policy E5 from the Yapton Neighbourhood Plan states that to both retain and encourage biodiversity, flood attenuation ponds should, where possible, be included in the design of the development proposals. If this is not possible, other forms of Sustainable Urban Drainage Systems (SuDS) should be provided.

6.77 A suite of ecological surveys have been carried out to inform and accompany this application. The Preliminary Ecological Assessment confirms that:

- i. the grassland on the Site is considered to be of limited ecological value and it is the bordering tree lines and scrub that provide greater ecological value to the local wildlife community;
- ii. the tree line and scrub habitats are considered to be optimum for breeding birds and

provide landscape connectivity;

- iii. a sensitive lighting scheme should be secured at reserved matters stage to ensure no potential tree roosts or commuting / foraging flight paths are negatively impacted upon;
- iv. the Site is not considered a suitable habitat to support great crested newts, water voles or otters;
- v. there is no evidence of badgers using the Site; and
- vi. enhancements proposed throughout the scheme would provide an increase in biodiversity interest to the site post development i.e. a net gain.

6.78 The Bat Survey confirms that a high frequency of bats were recorded along the tree lines and hedgerows in the northern section of the Site. However, the retention of these trees and hedgerows, together with the provision of new tree lines and hedgerows in areas which connect to other linear features within the surrounding landscape, can ensure local bat populations can still commute and forage across the Site. The creation of new wildflower areas and SUDs would provide new opportunities for a range of invertebrates and therefore bats. As such, there is potential for the site to increase its biodiversity interest post development.

6.79 The submitted Bird Survey confirms that the edge habitats were identified as supporting a range of common bird species and as such, it recommends that the boundary treelines, hedgerows and scrub are retained and enhanced. It is further advised that new habitats created as part of the masterplan including areas of wildflower areas, SUDs and new planted hedgerows, would result in new opportunities for a range of bird species which in turn would provide a net increase in the biodiversity interest. These recommendations have been adopted in the Proposed Development.

6.80 The Reptile Survey confirms that only slow worms are detected on site. The slow worms are found on the very edge of the site, on the northern and western boundaries. Mitigation measures for the slow worms are identified within the report as relatively straightforward due to the slow worms only being found on the rough grassland margins of the site. Assuming the Site remains arable land and that the development and access footprint do not impinge on the vegetation margins, the only mitigation required would be to erect an exclusion zone fence. The proposed development converts arable land to suburban gardens which will in itself make

a larger area suitable as habitat for slow worm. Habitat creation and enhancement can be used to ensure the future optimal use of gardens and retained natural margins of scrub and grassland on the site by slow worms, as well as encouraging colonisation by other fauna. It is considered that the enhancements of the site will provide optimal opportunity in the future for the slow worm population, as well as encouraging the wider vertebrate and invertebrate fauna from the nearby area to colonise and co-exist with any future building development on the site. The Proposed Development will provide new opportunities for fauna species in the local area. The Reptile Survey concludes that with specific enhancements in place the site will be enhanced for a range of wildlife, including for reptiles. The enhancements would result in new habitats within the red line boundary and result in an increase in biodiversity interest in on the Site.

- 6.81 In summary, the ecological assessment work carried out confirms that provided that the tree / hedges that border the Site are generally retained (as is proposed), the impacts of the Proposed Development can be mitigated and can in fact deliver a biodiversity net gain.

Ground Conditions / Contamination

- 6.82 Paragraph 120 of the NPPF states that:

"To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate to its location".

"Where a Site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/ or landowner."

- 6.83 A Geo-Environmental Desk Study has been prepared by BRD. The Study concludes that the vast majority of the Site is unlikely to be significantly contaminated. Low to medium risks have been identified from infill of a former deep drainage ditch, fly-tipped waste around parts of the Site boundary and potential pesticide residues in the soil. The Geo-Environmental Desk Study recognises that the site has moderate to low contamination risks identified by the Phase 1 Desk Study and therefore a Phase 2 Contamination Assessment is necessary to assess the significance of these potential pollutant linkages. The Assessment recommends that a Phase 2 Contamination Assessment is undertaken to assess the significance of these potential

pollutants.

Agricultural land

- 6.84 Paragraph 112 of the NPPF states that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
- 6.85 Yapton Neighbourhood Plan Policy E1 states that development on Grade 1 and Grade 2 agricultural land will be refused unless:
- i. it involves the granting of planning permission for the development of the housing allocations identified in this Plan (Policy SA1 and SA2); or
 - ii. it involves the granting of planning permission for any additional housing sites required by Policy H1 to meet objectively assessed housing needs in the Plan area.
- 6.86 An Agricultural Land Classification Study has been produced which confirms that the Site comprises Grade 2 and SubGrade 3a. However this complies with the Yapton Neighbourhood Plan as Policy E1 allows for the development of such land where it is for housing sites required to meet the objectively assessed housing needs in the Plan area. In this case the Site, and the wider Yapton SD7 allocation, have been identified as requirements for the District to meet its needs for housing, and the Local Plan Inspector has raised no issues in this regard.

Conserving and Enhancing the Historic Environment

- 6.87 Paragraph 128 of the NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected by development, including any contribution made to their setting. Paragraph 129 adds that the local planning authority should then identify and assess the particular significance of any heritage asset and take this in to account when considering the impact of proposals. In particular, paragraph 131 states that local planning authorities should take account of:
- i. the desirability of sustaining and enhancing the significance of heritage assets;
 - ii. the positive contribution that conservation of heritage assets can make to sustainable communities; and

- iii. the desirability of new development making a positive contribution to local character and distinctiveness.

6.88 Emerging Local Plan Policy HER DM6 states that there is a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains.

6.89 Yapton Neighbourhood Plan Policy E9 states planning permission will not be granted for development that would result in the loss of either listed buildings, or the buildings or structures of character set out Appendix 1 and Appendix 2 of the Neighbourhood Plan.

6.90 An Archaeological Desk-based Assessment has been submitted with this application and concludes that:

- i. the Site lies within an Archaeological Notification Area;
- ii. there are no known heritage assets within the area of the Site;
- iii. the listed buildings closest to the Site will suffer no loss of significance from the Proposed Development;
- iv. it remains therefore to determine if there might be potential for previously unrecorded heritage assets; and
- v. evidence of Roman occupation occurs immediately adjacent to the proposed Site in the west and could extend westwards into the Site itself.

6.91 The Archaeological Desk Based Assessment concludes that there is nothing to prevent the granting of outline approval on the Site (and it is of course part of an allocation in the emerging Local Plan). However, it recommends that further work is undertaken at reserved matters stage to ensure that any detailed scheme has appropriate regard to any potential below ground archaeological deposits.

7.0 Section 106 Planning Obligations

- 7.1 Draft Heads of Terms for a Section 106 Agreement, to provide a level of infrastructure to support the development in accordance with the Community Infrastructure Levy Regulations 2010 (as amended), are set out below. The exact scope and content of any Agreement will need to be discussed and finalised during the application process.
- 7.2 However following pre-application discussions with the Council it is expected, subject to confirmation of need, that the Section 106 will cover the following key areas (with all other than affordable housing provision being obligations for appropriate financial contributions):
- i. Affordable housing provision
 - ii. Transport (including local road impacts)
 - iii. Education (financial contributions towards primary, secondary and sixth form provision)
 - iv. Healthcare
 - v. Library facilities
- 7.3 Discussions with Officers on the above will continue during the application process such that agreement can be reached by the time that this application is reported to Committee.

Education

- 7.4 As set out previously in this Statement, the Local Plan Inspector has asked the Council to review its position on the need for a new primary school within the Yapton SD7 allocation. Yapton Parish Council has made it clear that it does not consider that an additional school is needed or desirable and instead strongly favours a financial contribution for the improvement to the existing Yapton Primary School.
- 7.5 The Council's proposed further Main Modifications to the emerging Local Plan, as approved by the Council on 21st November 2017, propose to amend criterion a) of Policy H SP2c to state that a new one form entry primary school only needs to be provided if the need is generated, allowing for a financial contribution towards new facilities or the improvement or expansion of relevant existing

facilities.

- 7.6 An Education Report has been prepared and is submitted as part of the application package. This report concludes, consistent with the views of Yapton Parish Council, that there is no requirement to deliver a new primary school on the Yapton SD7 site having regard to likely pupil yields from the development and other commitments. Instead, it is proposed that an appropriate financial contribution is made to improve existing facilities in the locality, either at Yapton or to assist in the funding of the new primary school proposed as part of the Ford strategic allocation (SD8).

8.0 Conclusion

- 8.1 The Site forms part of strategic site 'Yapton SD7' as identified in the emerging Local Plan. The Local Plan Inspector has raised no issues with the principle of the allocation but has directed that the capacity should be amended, even in the event that a primary school is required on site (which it is not), to refer to 'at least 500 homes'.
- 8.2 The Proposed Development would deliver much-needed housing and affordable housing in this highly sustainable location which is endorsed by the Council and consistent with the policies of the Yapton Neighbourhood Plan. It will deliver a range of social, environmental and economic benefits which include:
- i. the delivery of up to 250 new homes, including the delivery of up to 75 new affordable homes;
 - ii. direct and indirect economic benefits during the construction period and ongoing as a result of the additional local spend from the new residents;
 - iii. creation of a robust design framework within which high quality and locally responsive proposals, that respect the character and quality of Yapton, can be created at the reserved matters stage;
 - iv. location of new homes with excellent access to a range of facilities using non-car modes of transport.
- 8.3 The submission of the application accords with the Council's adopted strategy to encourage applications on first phases of allocations in the emerging Local Plan in an attempt to boost housing land supply in the short term.
- 8.4 Against this background, and in accordance with paragraph 14 of the NPPF, the development should be approved without delay.

Appendix 1: Screening Request

Planning Department

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Weybridge
Suite A
3 Weybridge Business Park
Ardlestone Road, Weybridge
Surrey KT15 2BW

Date: 26th June 2017

Ref: 32659/06

Dear Sir/Madam

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Request for a Screening Opinion Drove Lane/Bilsham Road, Yapton

On behalf of our clients Gleeson Strategic Land Ltd and Landlink Estates (the “clients”), either a combined or individual planning application will be submitted in due course, on the land currently forming the emerging allocation at Yapton (SD7). The planning application(s) will be submitted in outline form with all matters reserved other than principal access to the highways for:

“Development of up to 600 dwellings, public open space, play space and associated infrastructure” (“the Proposed Development”).

on Drove Lane/Bilsham Road, Yapton (“the Site”)

We are writing to request a Screening Opinion from the Council under Regulation 6 (1) of the Environmental Impact Assessment Regulations 2017 (“the EIA Regulations”), to confirm whether or not there is a requirement for an Environmental Impact Assessment (“EIA”) in respect of the Proposed Development. For the reasons set out below, our conclusion is that no EIA is required.

While the Proposed development is for up to 600 units. This screening request however reviews the whole site area as proposed within the emerging local plan.

In accordance with Regulation 6 (2) of the EIA regulations, this request is accompanied by:

- a) A plan sufficient to identify the land (Appendix 1);
- b) A description of the development including in particular
 - i. A description of physical characteristics of the development and, where relevant, of demolition works
 - ii. A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environmental likely to be significant effects of the proposed development

- d) To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from-
 - i. The expected residues and emissions and the production of waste, where relevant; and
 - ii. The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significantly adverse effects on the environment.

Further information to support the Screening Request, provided by a professional technical team, has been incorporated into this letter and includes inputs with regard to:

- (a) Highways and Transport
- (b) Landscape
- (c) Ecology
- (d) Heritage
- (e) Flood Risk

Location/Site

The Site is approximately 21.3 hectares in total and is located to the south west of the village of Yapton within the administrative boundary of Arun District. The Site currently comprises agricultural fields, some of which are separated by mature hedgerows and trees. The Site is immediately adjacent to the existing south western edge of the settlement boundary of Yapton.

The Site is not subject to any specific International, European, National or Local landscape biodiversity.

The Site topography is predominately flat. The Site is bounded along the northern edge by a mix of hedgerows and fencing and runs adjacent to the settlement boundary and the B2233. The east of the Site is bounded by Bilsham Road and Drove Lane runs adjacent along the western border. The south of the Site is part bounded by hedgerows; land to the south is in agricultural use. Within the Site there are a number of public rights of ways (PROW). These PROW run along the border of the west and south of the Site, and pass through the site adjacent to the existing field boundaries.

The majority of the Site is located within Flood Zone 1, however there is a small area of Flood Zone 2. Further information on this is provided later in this screening request.

As a location, the Site has good access via Bilsham Road and the B2233 where there is an existing junction with Drove Lane. The Site is located within walking distance of the services and facilities within Yapton, including village centre which contains shops, a medical centre and primary school. In terms of sustainable transport modes for journeys further afield, connections are available by public bus services and there is convenient access onto the A27 which connects Worthing and Chichester. Access to rail services can be obtained at either Barnham (approximately 2.5km to the northwest of Yapton Village) or Ford (the same distance to the north east), which provide services to destinations including Brighton, Southampton, Portsmouth, Littlehampton, Gatwick Airport and London Victoria.

In terms of nearby developments, there are a number of planning applications in Yapton that have been submitted to Arun District Council for approval which may produce cumulative environmental impacts. The maximum number of dwellings for the Site as set in this Screening Request is 600.

Planning Applications

Given the two separate landownership/ land control issues it is contemplated that the project may be split into two planning applications. One for land shown as parcel A and one for land shown as parcel B on the plan at appendix 2. Each application will be accompanied by a comprehensive set of supporting documents having regard to the Council's published Validation Criteria.

Gleeson Strategic Land Ltd and Landlink Estate are committed to working together in order to make the whole project area, as shown in the red line plan, work as one. However, for practical reasons it is possible that two complimentary, but separate applications, are submitted that deliver the joint masterplan. For this reason it is important for response to the screening request to take into account the red line project area along with cumulative impacts of the developments together with the wider area.

Requirement for an EIA

The Proposed Development does not fall within any category listed under Schedule 1 of the EIA Regulations. However it does fall within item 10(b) of Schedule 2 of the EIA Regulations as an "Urban Development Project" on land with an overall area comprising more than 5 hectares for more than 150 dwellings. This does not mean that an EIA is automatically required. Instead, the EIA Regulations require that an EIA be undertaken where the development is *"likely to have significant effects on the environment by virtue of factors such as its nature size or location"*.

The National Planning Policy Guidance ("NPPG") (ID 4-018-20140306) states that *"only a very small proportion of Schedule 2 development will require an assessment"*. To aid local planning authorities to determine whether or not a project is likely to have significant environmental effects, the NPPG provides a set of indicative thresholds (ID-4-057-20140306).

In order to assess any significant environmental effects, the selection criteria contained in Schedule 3 of the EIA Regulations should be applied. These are:

- a) The characteristics of development (having regard to size and design, cumulative impacts, use of natural resources, production of waste, pollution and nuisances, risk of major accidents and risk to human health).
- b) The location of development by reference to the environmental sensitivity of the area;
- c) The type and characteristic of the potential impact (having regard to the magnitude and spatial extent, nature, transboundary, intensity and complexity, probability, expected onset, duration frequency and reversibility, cumulative impact and possibility of effectively reducing the impact).

Items (a) and (b) of the above criteria will be explored within the following sections of this screening request. Item (b) has been provided at the introduction to this screening letter and is informed by the attached plans.

It should be noted that the EIA Regulations require EIA for qualifying developments where there are likely significant environmental impacts, and not solely where there would be likely environmental impacts that could be mitigated. Where likely impacts have been identified and potential mitigation is known to be capable of reducing such impacts to less than "significant" then such environmental considerations would be sufficient to justify the requirement of an EIA. This is an important distinction.

As aforementioned, the project technical team has already conducted a number of baseline surveys and preliminary investigations concerning the proposed project area. Their comments and technical input has been incorporated into the relevant section criteria for screening Schedule 2 development as outlined within Schedule 3 of the EIA Regulations.

The characteristics of the development and potential environmental impacts are explored below.

Characteristics of Development

The Proposed Development, for the purpose of this screening request has been based upon maximum unit total and in consideration of the potential environmental impacts (whether they are likely to be significant or not) and that submitted unit total may be lower than the identified 600 units.

The Proposed Development includes:

- Up to 600 dwellings
- Associated landscaping

Characteristics of the Potential Impact

Any environmental impacts arising from the Proposed Development will be addressed through the supporting reports that will accompany the planning application, as identified earlier within this screening request. The core environmental considerations are provided below, together with input from technical consultants on each issue.

Highways and Transport

This section has been provided by Odyssey.

Odyssey have undertaken detailed assessment of proposals of up to 600 dwellings on the proposed site. As part of any planning application on the site a Transport Assessment (TA) and a Residential Travel Plan will be submitted and will assess the impact of the proposed development on the highways network.

The Site will have two primary accesses, one from Bilsham Road and the other from the B2233 North End Road. An additional emergency access is also being investigated should the highway authority consider it necessary.

From the work undertaken to date it is clear the potential effects on traffic and transport due to the development proposals will include:

- A change in traffic flows on the local highway network (links and junctions) due to traffic generated by the development, in both the construction and the operational phases;
- a change in the number of pedestrian and cycle trips in the local area; and
- a change in accident risk and highway safety.

The operational phase of the TA will take account of the cumulative effects of other committed or proposed development sites located within Yapton, namely Brookworth Homes approved site at Burndell Road for 45 dwellings, Land North of Burndell Road for 173 dwellings which, at the time of submitting this screening request are under construction and Land South of Burndell Road, proposed for 108 dwellings which is currently awaiting a decision from the Secretary of State.

Initial work undertaken has found that the majority of local junctions within Yapton will only be marginally affected by traffic generated by the development site and would continue to operate within capacity. The greatest impact would however occur at the B2233 Burndell Road/ B2132 Bilsham Road mini-roundabout; if deemed necessary its operation could be improved by conversion to a signalised junction and which could incorporate pedestrian crossings. At the A259 junctions at “Oystercatcher” (junction with B2233) and “Comet Corner” (junction with B2132) the capacity of both is expected to worsen on the side road approaches due to traffic growth both on these roads and on the A259 itself.

Options have been identified to mitigate the impact of the additional development traffic and provide safer layouts as previously mentioned. We are aware of larger scale improvements at the junctions which West Sussex County Council (WSCC) may bring forward to provide a roundabout and traffic signals respectively. Discussions with WSCC are being progressed to confirm whether either of these proposals are likely to take place.

The impact of the construction phase of any development on site would be dependent on various factors including the final programme of construction works, build out rate, import/export of materials and construction processes adopted. Consequently a qualitative assessment will be made for the potentially significant transport and access effects of the proposed construction works.

It is clear from the work undertaken by Odyssey that transport considerations would not form a justified basis upon which to require an EIA by virtue of potential environmental impacts falling short of significant.

Landscape

A landscape and visual impact technical note has been prepared by FPCR and outlines the potential environmental impacts as a result of development on the site. This note is attached to this screening request (Appendix 3).

The note outlines the potential landscape receptors, potential visual receptors and potential environmental impacts. It is proposed that a Landscape and Visual Appraisal (LVA) is submitted in support of any planning application made for the site which will be supported by a number of plans, showing topography, published landscape character and designations. FPCR have already undertaken the site visit for this work and will be looking to produce the assessment shortly, working with and informing the masterplan. The LVA will be based on the parameter plans submitted in support of a planning application. Potential cumulative visual and landscape impacts would also be assessed as part of this assessment.

Public Rights of Way

Although any development on site would not seek the diversion of any PROW it should be noted that the development would likely have a significant impact on the setting of the route located within the Site as it will change from its current rural setting to a built up environment. Access along this route would also be considered during the construction process. It is proposed that the development will incorporate mitigation in the form of green infrastructure corridors along the PROW routes thereby reducing any impact from the proposed development so that residual impact is less than significant.

Summary

In terms of the potential to impact the surrounding landscape character or visual amenity, the development of the site will have an impact. However, the assessment of effects on each receptor will inform the masterplanning and design process, and it is likely to result in evolution to mitigate proposals. Initial work undertaken identifies that the following mitigation are likely to be integrated into the proposals:

- planting of hedgerows and trees along boundaries of the Site that abut open countryside, to reduce visual impact on visual receptors beyond;
- limiting height of dwellings to 2 storeys around the edge of the Site, to minimise any visual impact on receptors beyond;
- retaining existing hedgerows and trees, and integrating these into the proposed layout;
- incorporating existing public footpaths into green corridors.

Given the mitigation proposals above it is clear that the landscape and visual considerations would not form a justified basis upon which to require an EIA as the residual potential environmental impacts fall short of significant.

Ecology

A number of ecological surveys have been undertaken and have informed this screening request. The site does not fall within any statutory designated sites and no designated sites or nature reserves are located within 2km of the site. Within 1km of the site are two BAP Priority Habitat areas:

- Deciduous Woodland Priority Habitat – this habitat is found in small areas around the north and east within 250 metres.
- Coastal and Floodplain grazing Marsh Priority Habitat- 0.8km south of the site.

The site is dominated by intensively farmed arable fields surrounded by grassy buffers and hedgerows. These arable fields are considered to be of limited ecological value and are unlikely to support protective species. The surrounding hedgerows provide ecological value to the local wildlife community and therefore where possible development will include buffering and enhancement of the existing hedgerows along the site boundary. Suitable mitigation measures will be put in place if found to be required.

Having regard to the work undertaken to date, it is not considered that any development on the Site would cause any significant environment impacts in terms of ecological interests, either individually, or in combination with nearby proposed or consented schemes, or those under construction.

Heritage (built and archaeology)

The Site has two heritage assets within the proposed area; a small portion of the Yapton Main Road conservation area (designated heritage asset) falls within the northern portion of the site and the line of the former Portsmouth to Chichester 19th century canal (undesignated heritage asset) which runs parallel to the B2233. The development will be designed in order to be sympathetic in character to the conservation area and the canal. There are no listed buildings on site however there are a few listed buildings to the north of the site within the conservation area.

A very limited part of the site is located within the Yapton Main road conservation area, this comprises a small field to the north of the line of the former canal adjacent to Drove Lane. In addition the proposed access from

Bilsham Road is located in part within the conservation area and therefore the masterplan will take these into consideration. A heritage assessment will be submitted in support of the planning application for parcel B.

The Site does not lie within an archaeological Notification Area, however it is located adjacent to one and based on the record of discoveries of Bronze Age and Roman finds, likely to indicate settlements, Yapton Deserted Medieval Village and the Parish of St Mary. An archaeological assessment will be submitted in support of the planning application.

Therefore in summary, the masterplan will be designed to consider the designated heritage asset and its setting and is anticipated to mitigate against any adverse impact on either the conservation area or the 19th century canal. Any planning application will also mitigate against the potential for the discovery of currently unknown (below ground) archaeological assets (if any) through planning conditions attached to any consent. On this basis, there would not be any likely significant environmental impacts arising from the Proposed Development upon heritage or archaeological assets.

Flood Risk

Odyssey have been appointed to appraise the potential impact of flooding and drainage upon the proposed development. A flood risk assessment (FRA) will be submitted in support of any planning application.

In outline terms, the potential for significant impacts relate to the management of surface water runoff from the post developed site in order to ensure that flood risk is not increased within off-site areas. The majority of the site is located within flood zone 1 with a small section of parcel A being located in flood zone 2. The Environmental Agency flood map shows a small part of the Site as being in flood zone 3, but following detailed modelling of that part of the site, it has now been agreed with the EA that there is no flood zone 3 within the Site.

Flood Risk

Bilsham Ditch which flows through part of the site is a designated Main River by the Environment Agency with a small element of flood risk associated with it. Any development proposals very close to this watercourse could push river flooding offsite and have a negative impact on neighbouring properties. In order to mitigate against this most built development will be sited within Flood Zone 1, a small amount of highway will be located within Flood Zone 2, but to address this flood plain compensation will be provided. Onsite compensation will be provided on a level for level and volume for volume basis for any flood plain removed in favour of development.

Site specific hydraulic modelling has been carried out and will be utilised in testing any proposed mitigation options to ensure that flood risk is not exacerbated in areas upstream and downstream of the site.

Surface Water Runoff Management

The development proposals at the site may result in an increase in surface water runoff rates and volumes. This in turn could increase the risk of flooding downstream and impact on receptors. In order to overcome the risk of flooding Sustainable Drainage Systems (SuDS) will be incorporated into the development ensuring that the discharge water runoff is restricted to less than the pre-development greenfield rates. A combination of source control and site control techniques such as permeable paving with connecting swales leading to regional control features such as detention basins will be adopted.

These mitigation measures will ensure that peak flows and volumes leaving the site are less than the existing greenfield rates and any surface water runoff discharged into the nearby ditches meets the water quality requirements specified in the SuDS Manual (C697) and is commensurate with local policy.

It is apparent, that whilst there would be impact arising from the Proposed Development in terms of an increased area of hardstanding, and the resultant need to appropriately deal with surface water runoff, there would be mitigation solutions available that could effectively reduce potential impacts to a negligible level. Such details would be provided within an FRA as part of a planning application, however given that solutions are available, it could not be deemed that there is potential for significant environmental impacts, individually from the Proposed Development or in combination with nearby consented and / or under construction developments.

Cumulative Impact

Each technical consultant has considered the potential environmental impacts which may arise as a result of the Proposed Development in combination with nearby consented and / or under construction developments. In particular, technical input has focussed on the potential for 'significant' environmental impacts.

None of the technical disciplines have responded with the likelihood of significant environmental impacts individually or in combination with nearby developments following mitigation. Furthermore, given that all potential impacts could be mitigated to bring them to a less than significant level, it would not be likely that even when considering the combination of the impacts upon each environmental consideration that it could be deemed significant.

Summary

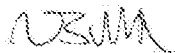
The EIA Regulations are specifically designed to consider the potential "significant" environmental impacts for developments where there is a likelihood of there being significant environmental impacts individually or in combination with nearby developments. The likelihood of impacts alone is not sufficient, in line with the EIA Regulations, to consider a development to be EIA development, nor would it be sufficient where there is potential or likelihood for significant environmental impacts where the presence of appropriate mitigation is already known.

On this basis, the conclusion of our assessment as to whether the Proposed Development should be considered EIA development and require the production of an ES is that it should not. EIA should be reserved, as intended by the legislation, for developments, which have a realistic likelihood of causing "significant" environmental impact individually or in combination, of which the Proposed Development is not one following the findings from a number of technical assessments.

It is noted that the Council has 21 days from the date of receipt to form a Screening Opinion. We trust that you have sufficient information to determine whether this is an EIA development under the EIA Regulations; but should you need any further information or clarification, please do not hesitate to contact either myself or my colleague Natasha Bullen.

Yours Sincerely,

p.p

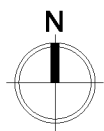


Zoe Knott

Senior Planner

z.knott@nexusplanning.co.uk

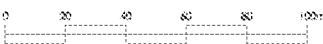
Appendix 1: Site Location Plan



Site
**SOUTH WEST YAPTON,
WEST SUSSEX**

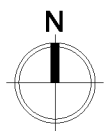
Drawing
Site location plan

Date	Scale	Drawing ref:
22.06.17	1:2500@A2	1244.00



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Appendix 2: Site Identification Plan



Site
**SOUTH WEST YAPTON,
WEST SUSSEX**

Drawing
Site identification plan

Date
23.06.17

Scale
1:2500@A2

Drawing ref:
1244.01



This drawing is for planning purposes only
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- KEY**
-  Site A - Gleeson Strategic Land Limited
 -  Site B - Landlink Estates Ltd

Appendix 3: Land and Visual Technical Note by FPCR

1. LANDSCAPE AND VISUAL

Potential Receptors

Potential Landscape Receptors

- 1.1 Published landscape character assessments have been prepared, covering the site and its context. At the national scale, the Site lies within Natural England's National Character Area (NCA) 126 'South Coast Plain'. This NCA stretches from the edge of Southampton in the west to Brighton and Hove in the east.
- 1.2 The West Sussex Landscape Character Assessment (2003) characterises the area encompassing the Site as the Chichester to Yapton Coastal Plain Landscape Character Area (LCA). The Site shares a number of key characteristics with this LCA, including low lying flat open landscape.
- 1.3 The Arun Landscape Study (2006) includes a landscape character assessment of the district. The study has attributed the following typologies to the area encompassing the Site:
 - L1b – Large scale open arable
 - L2 – Medium/small scale arable
 - L15 – Apparently unmanaged land
 - T1 – Amenity/ recreation
- 1.4 The Site lies within the following Landscape Character Areas:
 - 30. Bilsham Coastal Plain (low/ medium landscape capacity)
 - 21. West of Yapton Coastal Plain (low/medium landscape capacity)
- 1.5 The Landscape Capacity of Strategic Sites in Arun District (February 2017) study suggests that landscape capacity of the Site ranges from low in the west to medium/ high in the east.
- 1.6 The Site lies on the southern edge of Yapton. The landscape comprises a mosaic of small-medium scale arable fields adjacent to the settlement edge, crossed by a number of public rights of way, with larger arable fields beyond,
- 1.7 Vegetation along the settlement boundary helps create a soft filtered edge in a number of places where it interacts with the surrounding countryside, but areas of more limited vegetation make the edge of Yapton noticeable in the view. The Site is sub-divided by a number of hedgerows, although some boundaries are open, allowing shallow views into the Site.
- 1.8 The Site and its immediate context is not subject to any designations for reasons of landscape character. The north-western edge of the Site abuts a Conservation Area, containing a number of listed buildings.

Potential Visual Receptors

- 1.9 Due to the largely flat landscape, any vertical elements within the landscape act as visual barriers, limiting the potential visual envelope – i.e. areas from where the proposed development may be visible. Potential visual receptors are:

- a. Residents on the southern edge of Yapton (high sensitivity).
 - b. Residents on Blisham Road (high sensitivity).
 - c. Residents on Drove Lane (high sensitivity).
 - d. Users of public rights of way within the Site, and in the immediate context of the Site (medium-high sensitivity)
 - e. Road users of Blisham Road, Drove Lane and Barnham Road, B2233 (low-medium sensitivity)
- 1.10 It is not anticipated that there would be any notable change to views experienced from the eastern edge of Barnham.

Potential Environmental Impacts

- 1.11 There will be a number of landscape and visual receptors which could potentially be affected by Proposed Development on the Site. Those identified to date are highlighted below. Further receptors may be identified as part of the ongoing assessment work.

Landscape

- 1.12 The potential landscape receptors are described above. The proposed development would potentially impact:
- The character of the landscape – on both a Site wide and broader contextual basis. This will include consideration of any effects upon the existing key characteristics, as set out in published Landscape Character Assessment;
 - Landscape features of the Site, including trees and hedgerows;
 - The openness and land use of the Site and its immediate context.

Visual

- 1.13 The potential landscape receptors are described above. The proposed development would potentially adversely affect views experienced by these receptors.

Scope of Assessment

- 1.14 We will prepare a Landscape and Visual Appraisal (non-EIA) in accordance with the principles set by the Landscape Institute and Institute of Environmental Management and Assessment in the Guidelines for Landscape and Visual Impact Assessment Third Edition (2013). Viewpoint photographs will be prepared to help assess the effects from the potential visual receptors described above. A visual appraisal plan will identify locations of viewpoints, and will identify the primary visual envelope (i.e. areas from where primary views of the development may be experienced). The Landscape and Visual Appraisal will be supported by a number of plans, showing topography, published landscape character, and designations.
- 1.15 Conclusions on landscape and visual effects, whether adverse or beneficial, are drawn from the separate judgements on the sensitivity of the receptors and the magnitude of the effects.

This overall judgement involves a reasoned professional overview of the individual judgements against the criteria to make the final overall judgement.

Mitigation

- 1.16 Assessment of effects on each receptor will inform the masterplanning and design process, and is likely to result in evolution to mitigation proposals.
- 1.17 From an initial review of the potential receptors, the following mitigation measures are likely to be integrated into the proposed layout:
- Planting of hedgerows and trees along boundaries of the Site that abut open countryside, to reduce visual impact on visual receptors beyond. (Also reinforcement of existing hedgerows).
 - Limiting height of dwellings to 2 storeys around the edge of the Site, to minimise any visual impact on receptors beyond.
 - Retain existing hedgerows and trees, and integrate these into the proposed layout.
 - Incorporating existing public footpaths into green corridors.

Appendix 2: Screening Opinion



Miss Z Knott
Nexus Planning
Suite A,
3 Weybridge Business Park,
Addlestone Road,
Weybridge,
Surrey,
KT15 2BW

28 July 2017

Your Ref: 32659/06

Our Ref: PE/00464/17

Please ask for:
David Innes
Planning Department
Direct Dial: 01903 737776

Dear Miss Knott,

Environmental Screening Opinion for Land at Drove Lane/Bilsham Road, Yapton.

The Council considers the above proposal to be an Infrastructure Project (Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas) within section 10(b) of Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

With regard to the stated Schedule 2 criteria and thresholds, it is noted that the site area of approx. 21.3 hectares exceeds the applicable threshold of 5ha and the number of proposed dwellings of up to 600 units exceeds the applicable threshold of 150. The proposal is therefore Schedule 2 development and requires screening under the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

It is therefore necessary to consider the proposal against Schedule 3 of the Regulations. This schedule outlines the criteria to consider in determining whether development falling within Schedule 2 will require an EIA. The criteria includes the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration).

In addition, the Schedule 2 indicative thresholds set out in the same section of the PPG state in respect of 10(b) Infrastructure Projects that:

“Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

Sites which have not previously been intensively developed:

- (i) area of the scheme is more than 5 hectares; or*
- (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or*
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).”*

Furthermore, the following are identified as the key issues to consider –

*Physical scale of such developments; and the
Potential increase in traffic, emissions & noise*

The Screening Response now continues with regard to the Schedule 3 Headings.

(1) Location of the Development

The site is in agricultural use and adjoins the urban edge of Yapton.

The site currently lies within Flood Zone 1, with part of the site within Flood Zone 2. according to Environment Agency Flood map for planning.

The site does not include any listed buildings but there are heritage assets within the site namely a dry section of the former Portsmouth to Chichester Canal, which is located within the site to the south of Main Road. The canal section within the site is located within the Yapton Main Road Conservation Area. There are listed buildings to the north of the site and within proximity of the site.

(2) Characteristics of the Development

The proposed development consists of up to 600 dwellings, and associated landscaping. No details of the proposal have been included, but reference is made to two access points – one towards Main Road and one on to Bilsham Road. It will be essential that the access to the west does not impact the canal.

The development will generate additional traffic movements within the local area, however it is not considered that this will be significant within the EIA regulations having regard to the extent of existing residential development to the north and east of the site.

The transport impact will be assessed as part of the proposal where consideration must be given to the cumulative impacts of existing and other proposed developments.

The development does not seek to divert the Public Right of Way that crosses the site but it is acknowledged that there would be some impact on the route should the development be approved, whereby the route changes from a semi-rural path to built up area.

The site is not located within any designated site or site of ecological value. The application will be supported by an ecology survey that will be assessed by the Council's ecologist.

(3) Characteristics of the Potential Impacts

It is not considered that the characteristics of the likely impacts are such that they are particularly significant, or long lasting, that they affect a significant area of the district or that they are complex. The site has already been considered through the local plan process and shown to be deliverable in the Housing & Economic Land Availability Assessment.

It is not considered likely that the development will result in significant harm to ecological interests and it is considered that appropriate mitigation can be employed to respond to any localised harm to the site integrity that may occur.

The site is not at risk of flooding and the development represents a potential opportunity to improve the existing surface water drainage system and reduce the discharge rates to local watercourses.

The site does not include any listed buildings but there are heritage assets within the site namely a dry section of the former Portsmouth to Chichester Canal, which is located within the site to the south of Main Road. The canal section within the site is located within the Yapton Main Road Conservation Area. If built development or an access is proposed near to the conservation area boundary there will be harm, it will be necessary to submit a heritage assessment with the application and this will be assessed by the Council's heritage advisor. The setting of heritage assets and the mitigation proposed to address the harm will be a key consideration in relation to proposals near the conservation area. The level of harm cannot be significant to a point where an EIA would be necessary.

Although the increase in vehicular and other modes of traffic will be noticeable within the local area, it is not considered that this impact will be significant (in the context of the EIA Regulations) or long lasting. It is likely that over time, the new development will become accepted by the local population and the impacts will therefore soften and fade. There will be a requirement to justify how this site can become a sustainable location this will require convenient footpaths/cycleways to link with existing shops and services.

It is not considered that landscape impacts will be significant in the context of the EIA regulations. The surrounding landscape is flat and forms developed countryside with the village of Yapton to the north and nearby Barnham to the west. Landscaping and/or woodland planting to the boundaries of the site which adjoin with open countryside are likely to be sufficient to ensure that there is no significant or long lasting impact on the wider landscape.

Finally, although the construction phase of the building would result in some impacts (such as noise and dust) on the local population, these effects are likely to be short lived and not significant. However, mitigation may be required with regard to the parts of the site that border with existing residential developments.

Cumulative Effects

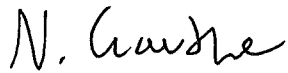
It is noted that the PPG states at paragraph 024 (Reference ID: 4-024-20140306) states with regard to cumulative effects that *"There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development"*. It is not considered that there are any

other existing or approved developments nearby which should be taken into account when assessing cumulative effects.

Conclusion

Having taken into consideration the above factors and having particular regard to the nature and scale of the proposal, it is not considered that the proposed development has the potential to result in significant impacts on the environment. There is scope to include mitigation measures to address potential harm that a major development will create in a semi-rural location. The impacts would be small scale and could be mitigated in accordance with standard methods. As such, it is considered that the proposed development does not constitute EIA development and as such an Environmental Statement is not required in this instance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Crowther', written in a cursive style.

Neil Crowther
Group Head of Planning

*Nexus Planning
Thames Valley*

3 Weybridge Business Park
Addlestone Road
Weybridge
Surrey
KT15 2BW

