



Your Ref: CMH/HS/S.6514
Our Ref:

Angmering Parish Council
The Corner House
The Square
Angmering BN16 4EA

admin@angmering-pc.gov.uk

10 June 2014

Dear Sir/Madam,

ANGMERING PARISH NEIGHBOURHOOD PRE-SUBMISSION DRAFT PLAN

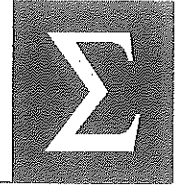
We refer to the letter of even date e-mailed and posted to you earlier and now once again enclose the Response Form to the above together with representations on behalf of Rydon Homes Ltd. The reason for this is the omission of the two appendices referred to in the text of the representations.

We apologise for this error.

Yours faithfully,

Sigma Planning
SIGMA PLANNING SERVICES

Encl.



Your Ref:

Our Ref:

ANGMERING NEIGHBOURHOOD DEVELOPMENT PLAN
2014 - 2029

PRE-SUBMISSION DRAFT PLAN

**REPRESENTATIONS
ON BEHALF OF
RYDON HOMES LTD**

June 2014

1.0 INTRODUCTION

- 1.1 Rydon Homes Ltd hold an interest in land east of Weavers Hill on the eastern side of the village of Angmering. They have commissioned a range of professional reports that have assessed the potential of the site for a mixed housing and recreational development and have sought to identify any constraints. Rydon are consequently promoting a development of around 27 dwellings, together with extensive open space on land within their control. The site has not been selected as a proposed housing allocation in the Pre-Submission ANDP. Rydon consider that this is not in the interests of the proper planning of the area and that the sites that are proposed to be allocated are questionable in terms of their sustainability and deliverability. Furthermore, the plan process has been flawed in a number of ways leading to the conclusion that the plan should not proceed in its present form.
- 1.2 Sigma Planning Services have been appointed to make representations about the Plan on behalf of Rydon Homes Ltd and have appraised it in terms of a wide range of considerations.
- 1.3 There are certain basic requirements to which a Neighbourhood Plan must conform and these are mainly set out in:-

National Planning Policy Framework (NPPF) – Paragraphs 183 – 185;
National Planning Practice Guidance (NPPG) – ID41, Paragraphs 001 – 079;
Town and Country Planning Act 1990 – Schedule 4B;
Localism Act 2011 – Chapter 3, Paragraphs 116–121 and Schedules 9–10;
Neighbourhood Planning (General) Regulations 2012.
- 1.4 Neighbourhood Plans are aimed to be prepared by local people and to reflect their views. Planning policy must not be so elaborate and forbidding that it becomes the preserve of specialists rather than people in communities. Nevertheless, Neighbourhood Plans will, once adopted, form part of the Statutory Development Plan and will play an important part in the delivery of the development and growth that is required in the District and the Country as a whole. They must, therefore, conform with the strategic policies of the District Local Plan and plan positively to support them. It follows that they must also be in conformity with National planning policy. In addition to being positively prepared they must be based upon proportionate evidence and aim to deliver sustainable development through selecting an appropriate strategy. This should be considered against reasonable alternatives and the selected policies and allocations should be demonstrably deliverable within the timeframe of the Plan.
- 1.5 These representations seek to test the Pre-Submission Plan against these principles.
- 1.6 The land in which Rydon hold an interest has not been actively promoted by the landowner in relation to the Arun DC “call for sites” or the subsequent SHLAA document. For this reason it appears to have been “overlooked” in the Neighbourhood Plan process to date. However it is a very strong

candidate for selection as a housing allocation because it is a small site, located close to the centre of the village, on a bus route, sustainable, unconstrained and deliverable without delay. It is therefore suitable, available and achievable, which are the qualities sought by the National Planning Policy Framework for new housing sites and these are confirmed at Paragraph 11.6 of the PSANDP. It has now been submitted in the Arun 2014 Call for Sites and should therefore feature in the updated SHLAA when that is published in due course.

- 1.7 It is considered that this site could contribute to the delivery of the minimum 100 new homes required in the Plan period 2014-2029.
- 1.8 It is further considered that this could either be in addition to the three housing allocations currently identified in the PSANDP or as a replacement for one or more of them because they are all less sustainable, constrained and/or uncertain in terms of deliverability.

2.0 THE PROPOSED HOUSING ALLOCATION

- 2.1 The site that is proposed as a housing allocation is edged red on the attached plan. It is located on the eastern side of Weavers Hill and fronts onto that road. It has an area of 1.3ha (3.21 acres) and is currently unused grassland. It is therefore a greenfield site but greenfield land has to be released in order to meet the current housing requirements in the Housing Market Area and to deliver housing to meet the need for market and affordable housing.
- 2.2 It is very sustainably located. Weavers Hill is a bus route (hourly service) and the village centre is only a short walk away, through the Cumberland Road estate which provides a safe and convenient pedestrian or cycle route to the village centre from the other side of Weavers Hill.
- 2.3 There is existing residential development on two sides – to the south and west. The extensive built complex of Avenals Farm, and other buildings, adjoin the site to the east. To the north the land slopes down steeply to the Black Ditch stream, beyond which, on the other side of Water Lane there is further residential development extending to the north. The site is therefore well related to and enclosed by the existing built-form of the village.
- 2.4 Rydon have prepared an initial draft illustrative layout plan to show how housing could be laid out on the site. This is by no means the “finished article” and Rydon would welcome the opportunity to discuss their proposals with representatives of the Parish Council and the local community.
- 2.5 The main sensitivities of the site are its elevated position and its relationship with the Conservation Area to the south. This must be treated with care to ensure that the character of the Conservation Area is preserved or enhanced. The illustrative plan shows significant areas of open space and a lower density of development on the southern half of the site reflecting the character of the adjoining development in this direction. On the northern side of the site there are smaller houses and a slightly increased density in order to achieve a suitable housing mix. However the housing is arranged with either the narrowest end gables facing north or dwellings set well back from the boundary in order to minimise the impact of buildings when viewed from the north. There is also extensive scope for planting along the northern boundary in order to filter or screen views.
- 2.6 The illustrative scheme proposes a total of 27 dwellings producing a gross density of 20.77 dwellings per hectare (8.4 dwellings per acre). Of these 8 dwellings will be Affordable (30%). The housing mix would be:-

2 bed -	10 units	-	37%
3 bed -	12 units	-	45%
4 bed -	2 units	-	7%
5 bed -	3 units	-	11%

There would be a mix of terraced, semi-detached and detached properties. Parking spaces are provided at the level of 2.5 spaces per property overall.

- 2.7 This approach will comply with the Core Objectives of the PSANDP and, in particular, the comments raised by local people and the policy objectives recorded at Paragraph 4.16 of the PSANDP.
- 2.8 The objective of the PSANDP in relation to housing is to identify land for possible future housing sites for a minimum of 100 new dwellings between 2014 and 2029. Policy HD2 seeks to allocate three sites producing a total of 102 dwellings, which meets the numerical minimum of 100 but Rydon have concerns about the suitability, sustainability and deliverability of these sites. These concerns are set out in greater detail later in these representations but if the three sites do not all come forward to deliver housing then the objective of the Plan will not be met.
- 2.9 Adding a further 27 dwellings to the total number of houses would increase planned provision to 129 dwellings which would still comply with the minimum provision policies figure but not exceed it by any disproportionate amount. It would also provide flexibility in the planned provision in case any of the other sites failed to come forward for development. Alternatively the Weavers Hill site, which is more sustainable and more certain of delivery, could replace one of the sites that are currently proposed.
- 2.10 Policy HD2 should be amended to accommodate one of these scenarios. It should also include the word "minimum" before the 100 figure to clarify that this is a minimum provision and to be consistent with other references to the figure elsewhere in the document.
- 2.11 In terms of compatibility with proposed policy HD3 the housing mix in the illustrative Rydon scheme is in general conformity with the policy but no 1 bed units are proposed and there is a higher proportion of 4+ bedroom houses. Nevertheless 82% of the dwellings are 2 or 3 bedroom properties. The proposed mix reflects the character of the area – particularly the Conservation Area to the south and lower density development that is characteristic of it. The general objective of increasing the number of 2 and 3 bedroom properties is therefore achieved.
- 2.12 The proposal will comply with the requirement of proposed policy HD4 in that the affordable homes can be offered initially to persons who have a local connection to the Parish.
- 2.13 The proposal will also comply with the criteria of proposed policy D5 – The Form of New Development and HD6 – Materials. Further details will be provided with any planning application but the proposal is also capable of consistency with proposed policies:

- HD7 - Streetscene
- HD8 - Housing Layout and Design
- HD9 - Housing Density
- HD10 - Parking provision
- HD11 - Phasing of Residential Development

There is no new infrastructure required that would delay the delivery of housing on this site.

- 2.14 Access to the site would be from a new priority junction directly onto Weavers Hill. Rydon have commissioned a Highway Consultant to advise on transport and highway matters and they have confirmed that a suitable access can be provided. There is also potential to improve forward visibility along Weavers Hill and to provide a bus lay-by. These would be of benefit to all current users of Weavers Hill.
- 2.15 Having regard to the above Rydon consider that a development along the proposed lines is capable of conformity with the policies of the PSANDP viewed as a whole and it would therefore be a suitable housing allocation.

3.0 COMMENTS ON THE PRE-SUBMISSION DRAFT PLAN

- 3.1 The first and most important point made by Rydon Homes is that, for the reasons explained in the previous section of these representations, land to the east of Weavers Hill should be included as a housing allocation within Policy HD2 of the Plan.
- 3.2 The lack of any Sustainability Appraisal (SA) or Strategic Environmental Assessment (SEA) of the PSANDP is a flaw. In view of the fact that the parent plan – Arun District Local Plan – has not been finalised, tested or adopted, a number of the key considerations in the NP – including housing numbers, cannot be confidently addressed. The lack of any SA of a 'parent' Local Plan increases the need for an SA of this NP. The reasons for choosing sites have not been assessed against reasonable alternatives, explained and supported by evidence and a comparative SA or SEA. An SA should therefore be carried out.
- 3.3 **Site Allocation – Bramley Green South (Mayflower Way)** Although this site has some "Brownfield" credentials there are questions about its sustainability, deliverability and consistency with Local Plan Policies.
- 3.4 In terms of sustainability it is remote from the village centre, which is not within walking distance. Most journeys to the village are, therefore, likely to be made by private car – increasing the problem of the lack of car parking provision in the village centre. Local access to schools and the community centre within the Bramley Green estate is available by walking but no other facilities are available locally. It lies outside the identified 10 minute walking zone and is not well connected to the village centre.
- 3.5 The southern part of the site lies outside the built confines of the settlement as defined on the Saved Local Plan. This area is allocated as open space (Saved Local Plan Policy SITE 3) and is within a designated Local Gap (Saved Local Plan Policy AREA 11). The Gap function is carried forward onto the Proposals Map of the emerging Arun District Local Plan. Development on this part of the site would therefore conflict with both the adopted and emerging Local Plans. This is contrary to the basic conditions that a draft neighbourhood plan must meet if it is to proceed to referendum – namely basic condition (e):
- "the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority".*
- 3.6 The northern part of the site forms part of a large mixed use allocation in the saved Local Plan (Policy SITE 4). It remains in employment use as a nursery and there are small business uses in the former cement works buildings which may find it difficult to relocate at an economic rent. The loss of this employment function would again be contrary to the Saved Local Plan and contrary to the basic conditions for a NP to proceed to a referendum.

- 3.7 The site is believed to be in multiple ownership and there are probably business tenancies in place. It is not in the hands of a developer and it has not been adequately demonstrated that it can be brought forward expeditiously to deliver housing development together with the other elements of the proposed allocation such as allotments and open space, within any specified timeframe – if at all. Until the landowners have made the situation clear and issued an assurance that they control all the necessary land needed to deliver this composite allocation, free from all tenancies or other encumbrances, then the site cannot be regarded as being deliverable. It therefore fails the test of National Policy for the supply of suitable housing sites.
- 3.8 This site is in an area that is subject to significant potential change in the near future in connection with the proposed strategic development allocation off Roundstone Lane. The future of this part of the village should be considered as part of a comprehensive approach to the southern and south-eastern outskirts of Angmering and not on a piecemeal basis as currently proposed.
- 3.9 **Site Allocation HA2: Field in Mayflower Way** This proposed allocation is in the same vicinity as HA1 Bramley Green South and suffers from many of the same disadvantages:
- it is remote from the village centre and most local facilities. It is therefore particularly unsuitable for affordable housing because residents would be reliant upon having access to a private car.
 - it is outside the built-up area boundary and lies within the Open Space and Local Gap designations on the adopted and emerging Local Plans. The Plan therefore conflicts with the Local Plan and should not go forward to referendum. The Gap area is important as part of the buffer and separation between the southern edge of Angmering, the A259 and the north-eastern edge of Littlehampton. The need for affordable housing can be met on other sites and does not amount to a reason for over-riding important environmental policy.
 - the site is greenfield and therefore should not benefit from any preference for development before other greenfield sites
 - the fact that the site is owned by the Parish Council has no planning significance and any preferential approach to this site risks putting the Parish Council's reputation into disrepute
- 3.10 **Site Allocation HA3: Chandlers Site** This proposed allocation is currently in very active use as a BMW dealer garage and premises. There is no certainty whether or when the company will leave the site. Until such certainty exists it cannot be said that the site is deliverable. It should not be included as a potential housing site because it does not comply with the requirements of the NPPF in this regard.

- 3.11 Furthermore the site is subject to flooding and it is not clear how much of the site could be redeveloped or whether the mitigation of a vulnerable use such as housing could be achieved. Further detailed assessment is required before it can be decided whether a residential scheme can be accommodated on this site or the number and type of units that may be accommodated. The development would be contrary to the NPPF guidance on flooding particularly as the Sequential Test and the Exceptions Test have not been carried out.
- 3.12 There is a significant loss of employment if this site closes and this would be contrary to Local Plan Policy and Objectives. The potential loss of employment does not appear to have been fully assessed and weighed in the balance of planning advantage.
- 3.13 The site is an existing use and has an existing use value. The flooding restriction and the requirement to provide ten additional parking spaces for shoppers will restrict the developable area. The requirement to provide a pedestrian crossing is another potential cost to be borne by any development proposal. There has been no draft layout provided as part of the NP process or viability assessment carried out to demonstrate that a development on this site is viable and will exceed the existing use value of the site. Until demonstrable evidence of the viability of housing development on this site has been provided the site cannot be assumed to be available and deliverable in relation to NPPF criteria.

4.0 CONCLUSIONS

- 4.1 There are clear questions about the sustainability, suitability and deliverability of each of the three proposed housing allocation sites. None are in the hands of a developer or have been demonstrated to be unconstrained and deliverable. Their proposed allocation raises conflicts with the Local Plan and National Planning Policy that are contrary to the Basic Conditions for Neighbourhood Plans and on this basis the Plan should not be allowed to proceed to referendum.
- 4.2 The suitability and deliverability of each of the sites requires considerable further investigation and supporting evidence before it can be considered to be a reasonable housing allocation. The Field in Mayflower Way (HA2) is fundamentally unsuitable for built development and should remain open in keeping with its role as part of an important open space/gap area. The Bramley Green South site (HA1) is only suitable for development of the northern section and further evidence is needed to be provided to show that it is deliverable. It is in any event, in an unsuitable location and should form part of the comprehensive strategic development of the area which will provide a range of new local infrastructure which would be more accessible, thus making the site more sustainable. The Chandlers site (HA3) requires further investigation as to the practicality of development in the light of its propensity to flood and also the viability of re-development having regard to its existing use value. It also needs to be supported by unequivocal confirmation that the existing business is vacating the site. An assessment is then required to determine whether the loss of employment is acceptable to the local economy and the availability of local jobs. A mixed use re-development of the site might be a better planning solution.
- 4.3 Neither the Chandlers site nor the Field in Mayflower Hill were assessed by the District Council's SHLAA (Appendix A to PSANDP).
- 4.4 For these reasons none of the proposed housing allocations are suitable. Considerable further investigation is required before any of them can be confirmed to be developable and deliverable. They should also be compared with reasonable alternatives, which include the Rydon land east of Weavers Hill, which has been demonstrated to be developable and deliverable at an early stage.
- 4.5 The Rydon site should be considered as an additional site to the existing proposed allocations as well as a replacement. This would be in accordance with the current housing numbers in the Neighbourhood Plan, which propose a minimum 100 dwellings. It would also be justified in the context of Arun District as a whole where housing numbers identifying the full Objectively Assessed Need for Housing in the Housing Market Area have not yet been settled and a higher housing requirement for Angmering is a potential outcome of the Local Plan process in due course. This situation is not addressed in detail in these representations, at this time, but Rydon will wish to provide more detailed evidence and assessment of OAN at the Examination stage if their case for inclusion of the Weavers Hill site is not accepted in terms of housing numbers at this stage of the process.

- 4.6 It is submitted that the PSANDP in its present form does not comply with the Basic Conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and should therefore not proceed to a referendum until it has been re-drafted in accordance with necessary additions to the evidence base and it addresses the flaws in the current Draft Plan.

C: RYDON S.6514 land at Weaver Hill, Angmering Neighbourhood Dev Plan June 2014



Angmering, Weavers Hill
 Sketch Scheme 10553 - SK01
 27 Units - 08.04.2014
 1/500 @ A1



A

Angmering

Cressingham Cottage

The Malt House

Ty Gwyn

Walnuts

Meadow End

WEAVERS HILL

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Promap

0m 10m 20m

