

## Angmering Parish Councils Objection to A/45/22/PL

This application follows A/129/21/PL for 191 houses at Rustington Golf Centre, which was refused planning permission on the following grounds:

1. The proposed development would result in a form of development which does not represent a natural progression of the built form in this locality and would appear divorced and isolated from the local community. The scale and density of the proposed development when considered in combination would create a form of development out of character with the locality. The proposal would result in a form of development which represents poor place making and a failure to create beautiful places contrary to achieve the aims and objectives of Policy C SP1, Policy LAN DM1, Policy D SP1, Policy D DM1 and Policy ENV DM3 of the Arun Local Plan, Policy HD6 of the Angmering Neighbourhood Plan, the National Planning Policy Framework, the National Design Guide and the Arun Design Guide 2020.
2. Insufficient information has been submitted regarding the proposed standalone crossing: a Stage 1 Road Safety Audit, an RSA Response Template and a speed survey are required to demonstrate that the proposed standalone crossing meets the appropriate design guidance. Insufficient information has been submitted regarding the provision of a route from the site towards the Public Right of Way No. 2160 which runs to the west of the site and the potential for increased use FP2160 and its uncontrolled crossing of the A259; the existing crossing would need to be assessed and it would need to be determined if further mitigation is necessary to accommodate the increased flows. Without mitigation, the proposed development would be inadequately connected to local facilities and amenities for non-motorised travel and would discourage journeys on foot and by bicycle and the greater use of the private car contrary to the aims and objectives of Policy D DM1, Policy T SP1, Policy T DM1 and Policy QE DM3 of the Local Plan and Policy TM2 of the Angmering Neighbourhood Plan and the Arun Design Guide 2020.
3. The proposed development would result in the re-development of an existing par 3 golf course (pitch and putt) which would be contrary to Policy OSR DM1 of the Local Plan as no robust and up-to-date assessment has been submitted clearly showing the facilities to be surplus to requirements (as required by Policy OSR DM1(a)). The proposed development does not include the provision of a replacement outdoor sports facility of equivalent or better provision elsewhere in the District in terms of quantity and quality and suitability of location (as required by Policy OSR DM1(b)); and the proposed development is for housing and apartments, not for alternative sports provision and is therefore contrary to Policy OSR DM1(c) and the National Planning Policy Framework.

4. The proposed layout impinges on the root protection areas (RPAs) of mature Monterey Pines and would result in the removal of 28 mature and semi-mature trees, which is unacceptable. Consequently, the proposed development is contrary to Policy D DM1 and Policy ENV DM4 of the Arun Local Plan, the Arun Design Guide and the National Planning Policy Framework.
5. Insufficient information has been submitted regarding bat emergence surveys and mitigation measures. Bat emergence surveys are required to be carried out and mitigation measures drawn up and agreed prior to the determination of this planning application. The lack of bat emergence surveys and mitigation strategies in relation to the impact on protected species and the potential for the proposed development to protect existing habitats where possible is unacceptable. As such, insufficient information has been submitted to determine whether it is contrary to Policy ENV DM3 and Policy ENV DM5 of the Local Plan and the National Planning Policy Framework (2021), in terms of species and habitat protection and mitigation.

The following analysis considers whether the current application for 167 dwellings on the same site addresses these reasons for refusal and what the Parish Council can contribute to this assessment.

#### Reason 1

The application proposal remains a large scale and dense form of development (which now includes 3 storey Apartment Blocks) on the same site which would appear divorced and isolated from the local community. It is considered that this reason for refusal remains relevant.

#### Reason 2

This is a technical highway reason for refusal and WSCC Highways will advise on whether it has been correctly addressed.

#### Reason 3

A 'Golf Course Needs Assessment' has been submitted which concludes that the Par 3 course that would be lost to this development is surplus to requirements because the provision in the area of such courses is higher than general for West Sussex or the rest of the Southeast and England.

The Assessment takes no account of the many teenagers, who currently use this Par 3 course, and are unlikely to be able to travel to an alternative. The massive increase in housing in this area is bound to lead to an increase in demand and a proposal to lose this youth facility can only be regarded as a retrograde step.

#### Reason 4

An Arboricultural Impact Assessment has been submitted to assess the amended layout and its affect on the existing trees. A total of 28 trees, groups and sections of groups would need to be removed as a result of this development. In addition, paths and roads within the development will impinge on the root protection areas of other trees on the site, including the Monterey Pines. The report argues that the sandy soils of the site mean that these roots will be deep and recommends methods of construction to avoid damage. ADC's Tree Officer will need to scrutinise this to ensure that long term health of these important trees would not be adversely affected.

#### Reason 5

The application includes a Bat Activity Report reporting on surveys undertaken in April, July and September 2021 which found that there was foraging activity by bats and recommends mitigation including construction working hours and controls on lighting. This report and its recommendations need to be scrutinised by an independent qualified ecologist.

It is noted that, in their Pre-Application Advice to this revised Proposal , Arun District Council stated that :-

*..... if an application for the pre-application enquiry proposal were submitted it would likely to be refused.....*

Angmering Parish Council OBJECTS to the proposed development on the following grounds:

- Reason for Refusal 1 of A/129/21/PL remains applicable in that the proposed development would result in a form of development which does not represent a natural progression of the built form in this locality and would appear divorced and isolated from the local community.
- The scale and density of the proposed development when considered in combination would create a form of development out of character with the locality.
- The proposal would result in a form of development which represents poor place making and a failure to create beautiful places contrary to achieve the aims and objectives of Policy C SP1, Policy LAN DM1, Policy D SP1, Policy D DM1 and Policy ENV DM3 of the Arun Local Plan, Policy HD6 of the Angmering Neighbourhood Plan, the National Planning Policy Framework, the National Design Guide and the Arun Design Guide 2020.

- The loss of a sports facility used by the youth in the area, when there is likely be an increase in demand is a retrograde step conflicting with the aims of improving youth facilities set out in the Angmering Neighbourhood Plan
- The information submitted to address Reasons 2-5 is technical in nature and should be carefully scrutinised by appropriately qualified and independent specialists to ensure that the development does not adversely impact highway safety, recreational facilities, the long term health of important trees on the site and safeguards protected species and habitats.

## **The APC Objection to A/129/21/PL also contained further comments and is repeated below.**

### **A/129/21/PL Rustington Golf Centre 191 houses**

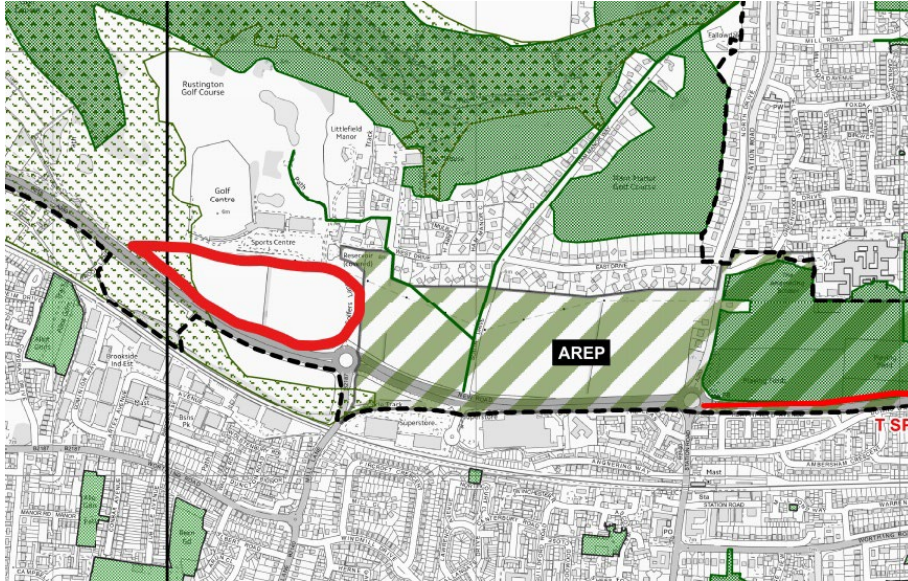
APC concerns are;

- Loss of open space between settlements
- Removal of a very popular leisure facility
- Ingress & egress from site onto A259
- Capacity for flow on roundabout
- Lane management from Mill Lane onto A259 heightened due to site
- Footpaths and cycle paths
- Access safely to south of A259 facilities (we think needs a footbridge)
- Safer routes to school, particularly primary schools
- Acoustic barrier potential height required (issue in Littlehampton Fitzalan link road)
- Drainage

Angmering Parish Council arranged several meetings with representatives from Rustington, East Preston, Kingston and Ferring Parish Councils and their Clerks, as well as their District Councillors. After initial meetings to discuss our main concerns, a meeting was arranged with representatives of Barratt David Wilson. Concerns were raised and emphasised using local knowledge and use of the areas that will ultimately be affected by the potential housing. This led to a combined response to the application from Angmering and Rustington Parish Councils, with full support from East Preston, Ferring and Kingston.

### **Location of Development**

The site (outlined in red) is adjacent to BUA boundary of Rustington. It is also adjacent to but not within Angmering to Rustington / East Preston Gap. The western tip of site is within a Biodiversity Opportunity Area.



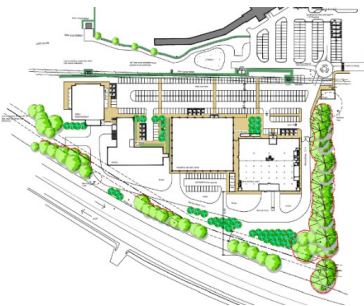
## Planning History

### **A/84/17/PL New retail unit approved 9/5/2018**

Officer's Report – "The application site at Rustington Golf Centre is already in commercial leisure use. The proposed retail unit would be accommodated in a building within a complex of buildings and complimentary leisure uses which already have planning permission (A/77/16/PL), which was granted in January 2017. This retail development (A/84/17/PL) and the approved leisure development (A/77/16/PL) at Rustington Golf Centre are not expanding into the rural area, but are to be sited between the existing built development and the A259 to the south of the Golf Centre".

### **A/77/16/PL New hotel, pub and leisure development approved 25/01/2017 (expired)**

Officer's Report – "The proposal is considered to comply with relevant Development Plan policies in that it adds new commercial and tourism development to an existing commercial leisure location without impacting further on the rural character. The development would have no materially adverse effect on the visual amenities of the locality or the residential amenities of residential properties, nor would it have an adverse impact upon the established character of the surrounding area".



Retail Development



Hotel Development

## Proposed Development



## Principle of Development

The site is outside of the Built Up Area boundary and therefore its development for large scale residential development would be contrary to Arun Local Plan policy SD SP2 and Angmering Neighbourhood Plan policy HD3. The applicants argue that these policies are out of date because Arun DC cannot demonstrate a five year supply of housing land and that therefore planning permission should be granted unless “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” (NPPF 11 dii).

They also point to the precedent for development on this site created by previous planning permissions. These approvals were for the western part of the site only and justified on the basis that they added new commercial and tourism development to an existing commercial leisure location without impacting further on the rural character.

In contrast the proposed residential development would create an enclave of dwellings which has no relationship with either Angmering or Rustington. It is separated from Angmering by open farmland within the Angmering to Rustington/East Preston Gap and from Rustington by the A259 and commercial development and the railway line. It has no relationship to the adjacent leisure uses and indeed removes the part of the golf course previously retained under the earlier permissions. The pre-application advice from Arun DC raises concerns about the severance of this development site from schools and other facilities and the lack of footway on the north side of the A259 and considers that this will result in most trips being made by car. The severance of the development from other residential communities will also mean that residents will be less integrated into the community and are less likely to use local village facilities.

## Final Response

Angmering Parish Council objects to the proposed development on the following grounds:

- The site is outside of the Built Up Area boundaries of Angmering and Rustington and therefore its development for dwellings would be contrary to Arun Local Plan policy SD SP2 and Angmering Neighbourhood Plan policy HD3. The adverse impacts of this development would significantly and demonstrably outweigh the benefits, as set out below.
- The development would result in the loss of an extensively used sports and leisure facility, the main users being school aged children, often with their parents and young adults; whilst at the same time adding more residents to the parish who would need such facilities. This would be contrary to Policy OSR DM1 of the Arun Local Plan.
- The development would create a separate enclave of dwellings which would have no relationship with either Angmering or Rustington. The site is separated from Angmering by open farmland within the Angmering to Rustington/East Preston Gap and from Rustington by the A259 and commercial development and the railway line. This is likely to result in new residents not feeling part of either community and being less likely to use services and facilities within them or contribute to community life. It would therefore be contrary to NPPF paragraph 8 – social objective - to support strong, vibrant and healthy communities, and paragraph 39 of the National Design Guide which seeks to foster a sense of belonging and contribute to “well-being, inclusion and community cohesion”.
- The development would not be sustainable because of its severance from the nearest community of Rustington by the A259. The measures currently proposed to provide crossing points and other active travel opportunities are inadequate, will be viewed as dangerous by potential users due to the speed and value of vehicles on the A259 and are unlikely to convince any future residents to use modes of transport other than the private car to access services and facilities including local schools. It would therefore be contrary to NPPF paragraph 105 which says that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes”. It is considered that the only safe crossing point of the A259 would be a pedestrian footbridge, ideally linking up with footpath 2160 at the western end of the site. Locating a crossing here would also take pressure off the already “peak times” dangerous congestion on the very narrow footways on the bridge over the railway in Mill Lane.
- The Mill Lane/A259 Roundabout was not included in the Parsons Brinkerhoff A259 Route Improvement Study of 2013. The comments of WSCC Highways on the capacity of this roundabout take no account of the traffic congestion and tailbacks that currently occur at peak times. Traffic often backs up to the B2197 roundabout junction and beyond. The majority of traffic coming from the Rustington area turns right towards Worthing and at peak times a very high proportion illegally use the inside lane for this turn, creating a potentially dangerous situation. Numerous accidents and verbal altercations between

motorists occur, and further traffic from this development can only worsen the situation, contrary to Policy T SP1 of the Arun Local Plan and TM1 of the Angmering Neighbourhood Plan.

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- *This will be at odds with the proposals in the Draft WSCC Transport Plan 2022 – 2036 to reduce reliance on the family car and encourage more use of active travel and shared transport*
- It is clear that a common concern of the nearly 300 objectors to this proposal is the lack of doctors and dentists in the area. In addition to this development over 1000 additional houses in the north of Angmering are planned. Despite considerable S106 funding being available the NHS seem to be incapable of improving the situation and every new development leads to a further deterioration, contrary to Policy HWB SP1 of the Arun Local Plan and CLW4 of the Angmering Neighbourhood Plan
- The development would result in a significant break in the continuous “green” corridor on the north side of the A259 between the Body Shop Roundabout, Littlehampton and Station Road, Angmering. This would substantially reduce the rural nature of the landscape in this area. In addition, the “stands” of substantial trees, mainly Monterey Pines, on this site and the adjoining Gap Between Settlements, also on this side of the A259, are a distinctive landscape feature seen across open space and that landmark view would be lost on this site. One of the reasons Arun officers gave for the refusal of a recent application, A/100/21/T, to fell 12 of these Pines on the adjoining Gap was:- “These high profile trees of significant landscape and visual amenity; whose value extends beyond their individual worth”. The report also refers to them as “an important landscape feature”. The loss of this green infrastructure and landscape features would be contrary to Policies GI SP1 and LAN DM1 of the Arun Local Plan.
- The development would result in increased flooding in the area due to the amount of hard surfacing and buildings proposed which would reduce the current infiltration of water into the soil. It is noted that the District Council’s Drainage Engineer has lodged a holding objection due to the inadequacy of the information provided on drainage of surface water from the site. Allowing this development would therefore be contrary to NPPF paragraph 167 which says “When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”.



