

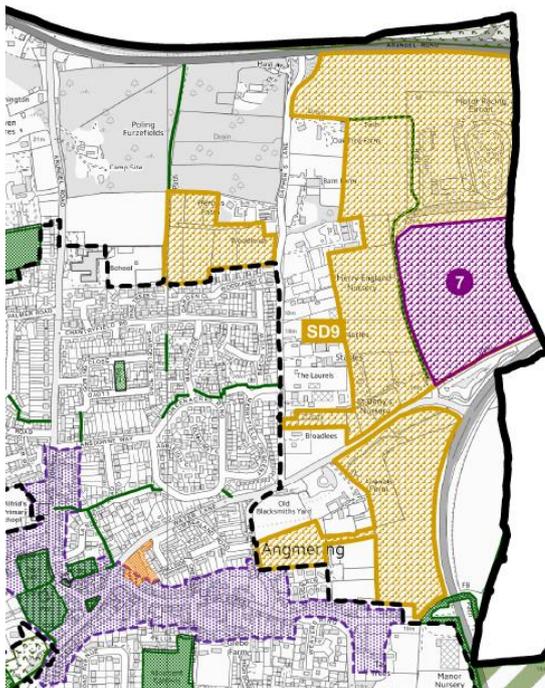
## Inspectors Interim Question Arun District Council Response to Paragraph 23

### Introduction

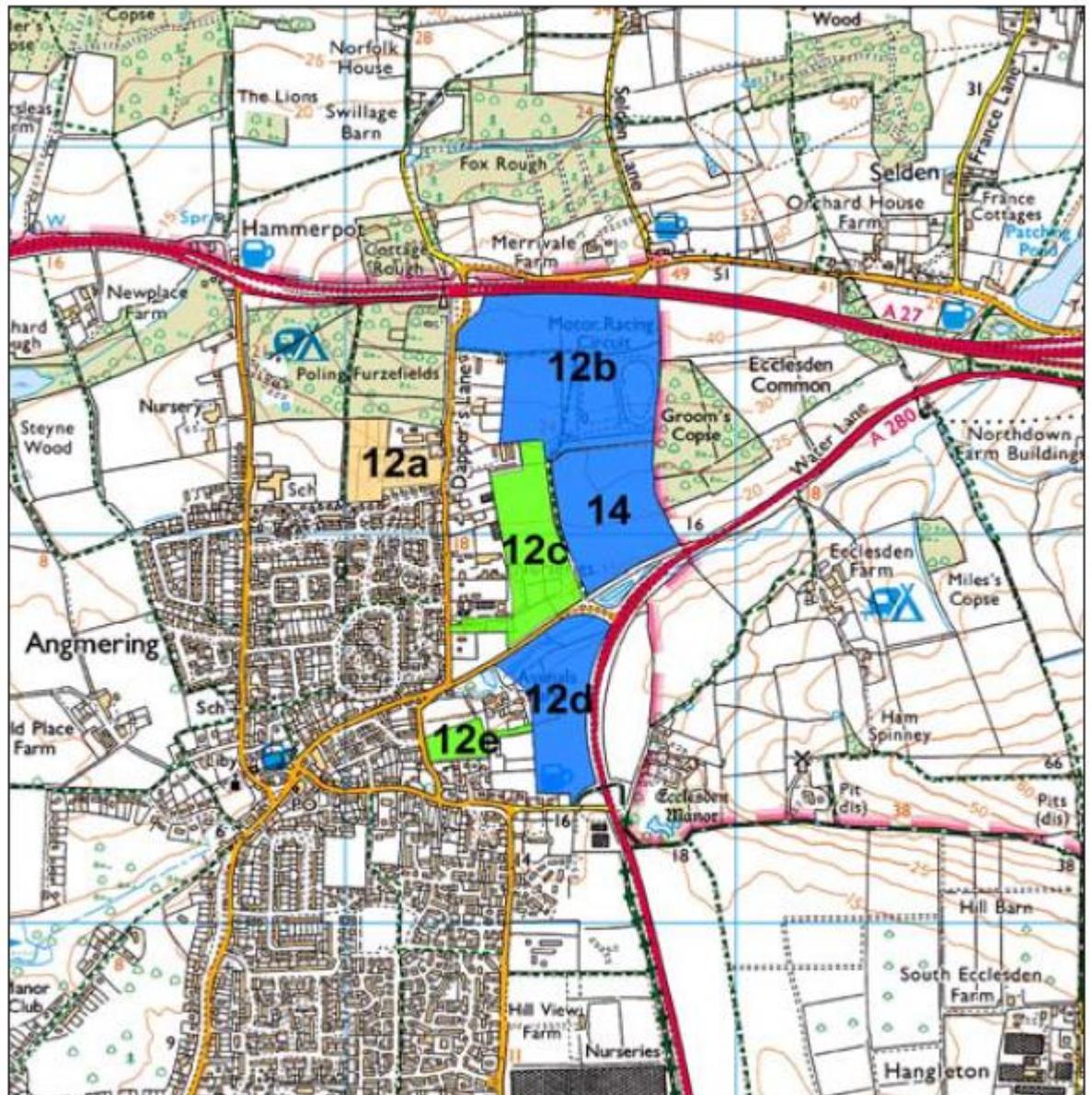
1. The Inspector has asked a number of questions following on from the examination, one of which relates to the landscape assessment of the Angmering North Strategic allocation (SD9). The Inspector states:

23. Some of the sites at Angmering North (those bordering the South Downs National Park (SDNP)) are shown to have 'substantial' landscape sensitivity and 'low capacity' for development (Sites 12b, 12d and 14 in the Landscape Capacity Study PESP5a). The sites are particularly visible from the publicly accessible elevated ground at Highdown within the SDNP but I could not see any specific analysis of viewpoints/receptors from this direction in PESP5a. I note that the SDNP Authority do not object to the allocations subject to the inclusion of an additional criterion within Policy H SP2c on landscape appraisal. I also accept that mitigation can be built into the developments in terms of landscape structure, retention of existing vegetation and buffer planting. **However, further information to justify the soundness of the allocations in terms of landscape impact would assist me.**

2. Arun District Council has produced a range of landscape evidence to inform its Local Plan and its proposed strategic allocations. This includes the Landscape and Visual Amenity Aspects of Development Choice – 2006 (PESP3) and Landscape Capacity of Strategic Sites in Arun District - 2017 (PESP5a), and to which this report makes reference.
3. The area covered by policy area SD9 can be found Local Plan Policy Map 4 - Update 2017 V1 (PELP39), and extract of which is provided below.



4. SD9 has been subdivided into six sub areas for the purposes of the landscape capacity study, Sites 12a-12e and 14. An extract of the plan of page 123 of the ADC landscape capacity study is provided below.



5. The focus of this report is Sites 12b, 12d and 14 which the landscape capacity study identifies sensitivity as 'substantial' and capacity as 'low'.
6. Landscape sensitivity is assessed in the landscape capacity study as a combination the following elements:
- inherent landscape quality
  - ecological sensitivity
  - inconsistency with existing settlement form/pattern
  - the contribution to separation between settlements
  - the contribution to the setting of surrounding landscape/settlement
  - visual sensitivity and

- the potential for mitigation.
7. Landscape value is assessed in the landscape capacity study as a combination the following elements:
    - Landscape designations
    - Ecological and other designations
    - Local distinctiveness
    - Any historic/cultural/literary associations
    - Contribution to setting of 'outstanding assets' Recreation and public access/locally valued spaces
    - Perceptual aspects (eg. Scenic quality, tranquillity, and remoteness)
  8. Landscape capacity is then derived from a combination of sensitivity and value.
  9. A finding of substantial sensitivity does not necessarily preclude development as it may be in relation to a specific constraint that can be mitigated. A higher sensitivity denotes the need for a more considered and sensitive approach.
  10. It should be noted that substantial sensitivity is one step above moderate sensitivity, major sensitivity being the highest. None of the Sites assessed within SD9 are assessed as possessing major sensitivity.
  11. The same is true of an assessment of low capacity. Development is not precluded but it may need to be of an appropriate scale.
  12. It should be noted that low capacity is one step below moderate capacity, negligible capacity being the lowest. None of the Sites assessed within SD9 are assessed as possessing negligible capacity.
  13. Much of the scoring within the assessment of sensitivity and value, and therefore capacity, derives from the proximity of the SDNP. The 1949 National Parks and Access to the Countryside Act, was a law made by parliament that set out what national parks would be like.
  14. The Environment Act 1995 revised the original legislation and set out two statutory purposes for national parks in England and Wales:
    - Conserve and enhance the natural beauty, wildlife and cultural heritage
    - Promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public
  15. The NPPF makes no specific mention of the protection of the setting of a National Park. Paragraph 003 Reference ID: 8-003-20140306 of the Planning Practice Guidance states that there is a duty to have regard to setting "*in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.*"

16. In this context it is important to recognise the Memorandum of Understanding that exists between ADC and the SDNPA, the body responsible for the management of the National Park.
17. The Memorandum of Understanding (ADCED52) is dated September 2017, and states at paragraph 5.4 that *“With regard to the representations received on Section 12 – Housing Delivery and HSP2c – Angmering site SD9, both parties agree to amend the policy by adding an additional criteria e to read as follows: e. be supported by a detailed Landscape Appraisal which has regard to the special qualities of the South Downs National Park, and must include landscape mitigation measures which address harmful impacts identified within the Appraisal.”*
18. This Memorandum of Understanding confirms the SDNPA agreement to the allocation, subject to appropriate mitigation, is consistent with this report, the allocation of the sites and can and should be given very significant weight.

## **Context**

19. The ADC landscape capacity study 2017 PESP5a assesses the landscape sensitivity of Sites 12a, 12c and 12e to be Moderate, and Sites 12b, 12d and 14 to be Substantial. Those sites assessed as having Substantial sensitivity do so chiefly because of intervisibility with the South Downs National Park (SDNP) and inconsistency with the rest of Angmering.
20. Photographs are included within the capacity study for each Site. Photographs 64-73 are relevant to Sites 12a-e and 14. The approximate locations of the viewpoints are shown in blue on the viewpoint location plan located in appendix 1.
21. Landscape value is assessed as Moderate for all sites with the exception of Site 12a which it assesses to have a Slight landscape value.
22. Landscape capacity is assessed as to be Medium / High for Site 12a, Medium for Sites 12c and 12e, and Low for Sites 12b, 12d and 14.
23. With the exception of Site 12e, all six sites fall within the Ecclesden Hills Landscape Character Area 43 of the Arun District Council Landscape Character assessment dated 2006. Site 12e is included within Angmering and is not the subject of the LCA.
24. The six sites are not the subject of any landscape quality designations, and none of the land within the SD9 allocation is within the Angmering Conservation Area (CA), which is located to the south west of the land south of Water Lane.
25. Sites 12b and 14 lie adjacent to the SDNP, whereas site 12d does not immediately abut the SDNP and is separated from it by the A280 and a single

field. Sites 12a, 12c and 12e are more distant from the boundary of the Park. As such there would be no direct effects upon the SDNP.

26. The eastern edge of Angmering is visible from within the National Park albeit that it is separated from the boundary of the park by approximately 300m and includes the A280 corridor. Built development is currently visible from this part of the National Park and is established as part of the landscape character. This includes the current effects of lighting, noise and loss of tranquillity from the built up areas of Angmering.
27. The land between the boundary of the National Park and the current built up area of Angmering plays a transitional role. However, this transitional role reduces to the west nearer the village. Also, the Arun Landscape Capacity Study (2017) recognises the corridor of the A280 as a containing feature.
28. Sites 12a, b c and 14 have a different character from the land around Sites 12d and 12e, lying on the scarp slope and falling from north to south. This area is bounded on two sides by major roads and also contains a motorsports racetrack. Furthermore, the land contains a number of well-developed tree belts, and is adjacent to Groom's Copse, both of which limit visibility of the site from the east.

### **Viewpoint Assessment**

29. In this section, five new viewpoints, labelled A-E, are introduced (in addition to Photographs 64-71). This section provides a specific analysis of viewpoints/receptors from within the SDNP as requested and seeks to clarify matters for the Inspector's benefit.
30. The five viewpoints have been selected to give a representative selection of views from both the higher ground at Highdown Hill and also the lower lying ground east of the A280. The location of the viewpoints is shown as an orange symbol and can be found in appendix 1.
31. The viewpoints help to demonstrate the potential landscape and visual effects from within the SDNP. Local landmarks and the extent of the six sites are annotated on individual images (which are contained within appendix 2).
32. **Viewpoint A** is taken from Footpath 2148 north of Ecclesden Manor. This is a low-level view across flat farmland toward the existing edge of the village. Properties on High Street, near the Spotted Cow pub, are visible. Rooftops and chimneys within Angmering are occasionally visible through the tree and hedge lines between the viewpoint and the village. To the north west the land rises toward the A27 and the SDNP near the communications mast. The woodland west of Dapper's Lane and Groom's Copse east of the motorsports track frame views of the rising land.
33. Site 12d sits beyond the A280 and the boundary planting. If 12d were to be developed it is expected that some rooftops would be visible. A generous

planted mitigation buffer is suggested along the eastern edge to address this issue.

34. Sites 12b, 12c and 14 sit on the rising land to the northwest. Site 12c is largely screened by existing vegetation and any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
35. Site 12b rises to the A27, the upper sections of which are clearly visible. In light of the comments in the landscape capacity assessment the upper section of this land north of footpath 2149 and the motorsports track should be kept free of development. Any residual effects would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
36. Site 14 sits at the base of the slope and is clearly visible in the view. Any development on this land should be lower density and subject to a comprehensive planted mitigation strategy. If the land is to be used for employment uses, consideration should be given to the design of the buildings required for B8 use classes as the larger roofs associated with this type of development are more difficult to mitigate.
37. **Viewpoint B** is taken from Footpath 2148 west of Ecclesden Farm. This is a low-level view across flat farmland toward the existing edge of the village. Properties on High Street, near the Spotted Cow pub, are visible. Rooftops and chimneys within Angmering are occasionally visible through the tree and hedge lines between the viewpoint and the village. To the north west the land rises toward the A27 and the SDNP near the communications mast. The woodland west of Dapper's Lane and Groom's Copse east of the motorsports track limit views of the rising land.
38. Site 12d sits beyond the A280 and the boundary planting. If 12d were to be developed it is expected that some rooftops would be visible. A generous planted mitigation buffer is suggested along the eastern edge to address this issue.
39. Sites 12b, 12c and 14 sit on the rising land to the northwest. Site 12c is largely screened by existing vegetation and any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
40. The southwestern parts of Site 12b are partially visible in this view. Any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
41. Site 14 sits at the base of the slope and is clearly visible in the view. Any development on this land should be lower density and subject to a comprehensive planted mitigation strategy. If the land is to be used for employment uses, consideration should be given to the design of the buildings required for B8 use classes as the larger roofs associated with this type of development are more difficult to mitigate.

42. **Viewpoint C** is taken from Footpath 2139/3 east of Ecclesden Manor and the disused windmill. This is an elevated view over the rolling landscape to the west and the existing edge of the village. Properties on Dapper's Lane are visible, particularly the nurseries and associated outbuildings at St Denys Nursery and The Acre. To the north-west the land rises toward the A27 and the SDNP near the communications mast. The woodland west of Dapper's Lane and Groom's Copse east of the motorsports track frame views of the rising land.
43. Site 12d is largely obscured by the intervening landform and the windmill. Such views that do exist are limited. There are no other open views of Site 12d from the higher ground within this part of the SDNP. If 12d were to be developed it is expected that the northern tip of the site would be visible. A generous planted mitigation buffer is suggested along the eastern edge and pockets of planting within the site to address this issue.
44. Sites 12b, 12c and 14 sit on the rising land to the northwest. Site 12c is partially screened by existing vegetation and any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
45. Site 12b rises to the A27, the upper sections of which are clearly visible. In light of the comments in the landscape capacity assessment the upper section of this land north of footpath 2149 and the motorsports track should be kept free of development. Any residual effects would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
46. Site 14 sits at the base of the slope and is clearly visible in the view. Any development on this land should be lower density and subject to a comprehensive planted mitigation strategy. If the land is to be used for employment uses, consideration should be given to the design of the buildings required for B8 use classes as the larger roofs associated with this type of development are more difficult to mitigate.
47. **Viewpoint D** is taken from Footpath 2139/3 on Highdown Hill. This is an elevated view over the rolling landscape to the west and the existing edge of the village. Properties on Dapper's Lane are visible, particularly the nurseries and associated outbuildings at St Denys Nursery and The Acre. Rooftops and chimneys within Angmering are clearly visible. To the north-west the land rises toward the A27 and the SDNP near the communications mast. The woodland west of Dapper's Lane and Groom's Copse east of the motorsports track frame views of the rising land.
48. Sites 12d and 12e are obscured from this viewpoint by intervening landform.
49. Sites 12b, 12c and 14 sit on the rising land to the northwest. Site 12c is partially screened by existing vegetation and any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.

50. Site 12b rises to the A27, the upper sections of which are clearly visible. In light of the comments in the landscape capacity assessment the upper section of this land north of footpath 2149 and the motorsports track should be kept free of development. Any residual effects would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
51. Site 14 sits at the base of the slope and is clearly visible in the view. Any development on this land should be lower density and subject to a comprehensive planted mitigation strategy. If the land is to be used for employment uses, consideration should be given to the design of the buildings required for B8 use classes as the larger roofs associated with this type of development are more difficult to mitigate.
52. **Viewpoint E** is taken from Ecclesden Lane east of the footbridge over the A280. This is a low-level view across flat farmland toward the existing edge of the village. Rooftops and chimneys at Avenals Farm are partially visible through the tree and hedge lines. To the north west the land rises toward the A27 and the SDNP near the communications mast. The woodland west of Dapper's Lane and Groom's Copse east of the motorsports track frame views of the rising land.
53. Site 12d sits beyond the A280 and the boundary planting. If 12d were to be developed it is expected that some rooftops would be visible. A generous planted mitigation buffer is suggested along the eastern edge to address this issue.
54. Sites 12b, 12c and 14 sit on the rising land to the northwest. Site 12c is largely screened by existing vegetation and any development on that land would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
55. Site 12b rises to the A27, the upper sections of which are clearly visible. In light of the comments in the landscape capacity assessment the upper section of this land north of footpath 2149 and the motorsports track should be kept free of development. Any residual effects would be capable of being mitigated by reinforcement of the existing tree and hedgelines.
56. Site 14 sits at the base of the slope and is partially visible in the view. Any development on this land should be lower density and subject to a comprehensive planted mitigation strategy. If the land is to be used for employment uses, consideration should be given to the design of the buildings required for B8 use classes as the larger roofs associated with this type of development are more difficult to mitigate.

## Conclusions

57. With regard to Sites 12d and 12e, localised views of any development would be restricted to receptors immediately on the boundary or within approximately 350m to the east of the site. Views of the sites from within the

SDNP would be limited to those areas to the east and would be limited to glimpses of roofs over the existing vegetation. Those views should be further filtered by mitigation planting along the eastern boundary.

58. It is acknowledged that Site 12d plays a transitional role between the current built-up boundary of Angmering and the SDNP but this role reduces the closer the development is to the built-up area. The Arun Landscape Capacity Study recognises the corridor of the A280 as a containing feature. The cutting and planting along the A280 should be retained and reinforced as part of any proposed development, continuing the transitional role.
59. Localised views of Sites 12a, b c and 14 would be restricted to receptors immediately on the boundary or within approximately 500m to the south east of the site. Views of the sites from within the SDNP would be limited to those areas immediately to the east and to the south east of the site. Any residual effects would be capable of being mitigated by reinforcement of the existing tree and hedgelines. Site 14 demands a more comprehensive mitigation strategy and form of development should be carefully controlled.
60. Sites 12a, b c and 14 also play a transitional role between the current built-up boundary of Angmering and the SDNP but this role reduces the closer the development is to the built-up area. The Arun Landscape Capacity Study recognises the existing tree lines within the site as containing features. These should be retained and reinforced as part of the proposed development, continuing the transitional role.
61. The effects on the setting of the SDNP are geographically limited and most residual effects would be capable of being mitigated.
62. This is consistent with the Memorandum of Understanding referred to, at paragraph 16 above.