AWDM/1394/22 20 Firle Road Lancing
Planning Policy Comments, December 2022

General Points:

The proposal is for 7 new dwellings (of 4 beds each). The site lies within the Built Up Area Boundary and therefore the principle of development is accepted (Policy 2 of the Adur Local Plan - ALP) subject to compliance with other policies.

The Design and Access statement (page 6) states that the site 'is designated for housing in the Local Plan'. Please note that this is *not* the case. (See also page 8 and 16 where this error is repeated).

The site is at the far northern end of the built up area and immediately adjacent to the South Downs National Park, specifically Lancing Ring Local Nature Reserve and Local Wildlife Site. Given this location biodiversity and landscape matters are a particular issue.

Biodiversity Matters.

Policy 31: Biodiversity of the Adur Local Plan states that all development should ensure the protection, conservation and where possible, enhancement of biodiversity. The policy also states that development likely to have an adverse impact (directly or indirectly) on a LNR or LWS will not be permitted unless it is demonstrated the reasons for the development outweigh the need to safeguard the nature conservation value.

The National Planning Policy Framework in paragraph 174 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"

<u>Impact on designated sites</u>

The site is adjacent to Lancing Ring Local Nature Reserve (LNR) and Lancing Ring Local Wildlife Site (LWS); and to the South Downs National Park. Whilst this site does not have a statutory or non- statutory designation, it is identified in National Habitat Network Mapping as a Fragmentation Action Zone. This is land that:

"...connects existing patches of
primary and associated habitats which are currently highly fragmented and where fragmentation could be reduced by habitat creation. Action in this zone to address the most fragmented areas of habitat can be targeted here."

The Preliminary Ecological Appraisal at paragraph 3.11 states that there is an area of recently cleared bare ground present in the north-west corner of the site. This is shown on Figure 1: Land North of 20

Firle Road Habitat Survey Map. The aerial photograph at Figure 3.1 of the Design and Access Statement shows the area prior to the clearance of this area. This demonstrates how the habitats within the development boundary are functionally connected to the habitats at the adjacent designated sites.

Biodiversity net gain

The Preliminary Ecological Appraisal in paragraph 5.11 states:

"A series of enhancement measures are recommended as part of the proposals in order to achieve a net gain in biodiversity, in accordance with current planning policy."

A number of measures are recommended in the appraisal, such as bird boxes, bat boxes, lighting and landscaping.

The Design and Access Statement at paragraph 4.3.03 refers to biodiversity net gain. However the applicant has not submitted a Biodiversity Metric or equivalent information. Nor is there any firm commitment to delivering. Without detailed information setting out how biodiversity net gain will be delivered and managed, it is not possible to conclude that the requirements of the NPPF, or Policy 15 of the Adur Local Plan have been met.

Given the recent clearance of part of the site, an earlier base date for assessing the pre-development biodiversity value may be more appropriate. Schedule 14(6) of the Environment Act makes such provision where as a result of activities carried out after 30 January 2020, the biodiversity value of the onsite habitat is lower on the relevant date than it would otherwise have been. However it is noted that this schedule has not yet been subject to a Commencement Order.

Landscape

The National Planning Policy Framework at paragraph 130 states:

"Planning policies and decisions should ensure that developments:
c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)"

The proposed scheme includes new and retained planting which would reduce the visual impact of the development from the South Downs National Park. However it is not clear from the proposal what measures are proposed to ensure that these features are retained. The trees within the site are not protected by Tree Preservation Orders.

In landscape terms it may be beneficial to secure a buffer zone between the end of the residential gardens and boundary with the countryside to ensure the gardens are not extended and there is no consequential impact on the character of the adjacent countryside.

Other Matters:

Policy 15 of the Adur Local Plan relates to the quality of the built environment, and sets out a range of factors to be taken into consideration. These include character, layout and design. The design of the

proposed dwellings differs in character from the surrounding residential properties in terms of design and materials and does not appear to be in character with the surrounding landscape. The proposed layout would bring residential development much closer to the boundary of the built up area (and therefore that of the National Park and LWS/ LNR).

I am also aware that there are concerns that the development may have an adverse impact on the amenity of neighbouring residents.

The same policy refers to light pollution; in order to avoid light spill the design of the development (or additional measures) would need to ensure there is no adverse impact (in terms of character or impact on biodiversity) on the downland area.

Policy 15 also seeks that development respects the natural features of the site (including land form, trees and biodiversity) and contributes positively to biodiversity - see comments above.

Section 2.2.04 of the Design and Access Statement refers to sustainability but does not address Policy 18 which requires that all new development meet a water efficiency standard of 110 l per person per day; unless this is addressed in other supporting documentation it is not clear how this proposal meets this requirement.

Policy 21 of the Adur Local Plan refers to affordable housing - however as the proposal is for less than 11 dwellings there is no requirement for affordable homes (as defined by national guidance and Adur Local Plan).

M Hayes and C Jones 16 December 2022