



Amberley Parish Council do not consider the SDNPA Local Plan to be 'sound' as defined under the National Planning Policy Framework (NPPF).

This specifically relates to SDA35 LAA Ref HO057 East Street Farm Amberley.

The following pages contain responses relate to these specific areas of the site:

Part 1 – Flood Zone Mapping

Part 2 - Watercourse Corridor & required Buffer Zones

Part 3 – Site Plan, Evidence base omission - Chalk Stream

Part 4 - Access and traffic design, highway safety

Part 5 - Settlement Boundary

Part 6 - Settlement sustainability

Part 7 - Site Plan, Middle Field

1. New flood zone mapping

Related policies & evidence: NPPF paragraph 172, SDA35 site Policy requirements, paragraph 4, SDW2 – Flood risk management, EA flood mapping 2026.

See Appendix 1 for associated maps.

The Environment Agency (EA) published revised Flood Zone mapping in November 2025 after the Regulation 18 consultation period had finished. This mapping identifies materially different flood risk affecting both the proposed allocation and adjoining residential development. Notwithstanding this, the opportunity to have due regard to the updated flooding predicted for the site from the updated EA information could and should have informed the South Downs National Park Authority (SDNPA) on whether the site was retained for a residential allocation. A robust examination of this flooding information by the SDNPA was therefore required and reasonably expected as part of a competent review and consideration of the allocation of site SDA35. No evidence of this approach has been provided.

The allocation in the Regulation 19 Plan relies upon an evidence base prepared before this revised mapping became available. Consequently, the Local Plan has not demonstrated that SDA35 has been reassessed against the most up-to-date evidence required by national policy.

In particular, the revised mapping now identifies areas of Flood Zones 2 and 3 affecting parts of the site and adjacent development at Newland Gardens. This represents a material change in the evidence base which should have been considered before publication of the Regulation 19 Plan.

The Newlands gardens development was enlarged 3 years ago on land that we now know to be in flood zones 2 & 3 and after completion, several properties experienced flooding. Mitigations have been put in place, but increased surface water runoff and reduced infiltration at the proposed development site will negatively impact the adjacent stream and increased flood risk further into the heart of the Amberley conservation area. It highlights the problems at Newland Gardens and illustrates the need for a Natural Flood Management scheme at the site to solve the existing issue.

Large parts of the adjacent proposed SDNP East street farm site are also in flood zones 2 & 3. This new information was not available at regulation 18 stage but was provided in November 2025 and should be considered as a material change in circumstances to be considered incorporated by SDNP into the revised plan for the regulation 19 consultation. There is no evidence that this has been done.

As a result of this updated EA flooding information, any new housing on the proposed site will displace more water into the surrounding environment as any surface water management will, likely already be flooded by existing ground water in the winter. This is likely to lead to an increased risk of flooding in existing and any new homes, making an existing situation worse.

Accuracy of the dataset

It is also worth highlighting that this information is not always locally accurate. Its accuracy is described by the Environment Agency as the following:

"The Flood Zones are designed to only give an indication of flood risk to an area of land and are not suitable for showing whether an individual property is at risk of flooding. This is because we cannot know all the details about each property."

It is based on nationally available LiDAR datasets (3D landscape models). Accuracy of this ranges from 15cm to 1m. The accuracy at East Street Farm fields is listed as 15cm RMSE (root mean squared error). We offer no criticism of this approach by the EA, which must by necessity more be general in nature given the geographic extent of their remit. However, observations of the community on the characteristics of the site suggested that the extent of actual flooding on the land was not accurately presented in these data sets.

For the purposes of providing an evidenced based submission which in our view constitutes a substantive planning consideration a separate and site-specific flooding study has been carried out by a competent and qualified professional as set out below.

New Dataset for LIDAR MAPPING

Through the resources of a local expert group a new LiDAR dataset for the site has been created, using professional grade drone-mounted LiDAR **accurate to around 2cm**, collected and analysed by the Director (Simon Briggs of Geodime) of a land surveying company with 40 years' experience. The new topographic model is therefore more accurate than data used by the national flood mapping and shows that land **inside** the developable area sits at the same height as land in flood zone 3. (this is shown by contour lines (lines of equal height) running across the Flood Risk 3 areas into the developable area. This information shows that the developable area is highly likely to be impacted by flooding and negatively impacting the stream running through the site. It is our opinion that this new and updated information represents a substantive planning consideration which counts against the allocation of site SDA35 for housing as is currently proposed.

Soundness tests

- **Not Justified** - The allocation is not justified because it relies upon evidence which predates a material revision to the Environment Agency Flood Map for Planning. The Plan therefore cannot demonstrate that the site selection, developable area or capacity remain appropriate when assessed against the most up-to-date flood risk evidence.
- **Not Effective** - The Plan has not demonstrated that development can be delivered over the plan period without increasing flood risk elsewhere, contrary to the requirements of national policy. No updated site-specific assessment has been undertaken to demonstrate that the revised flood extents, groundwater conditions, climate change allowances and surface water management can be satisfactorily accommodated.
- **Not Consistent with national policy** - National policy requires plans to apply the Sequential Test and to direct development away from areas at highest flood risk and to base decisions on the most up-to-date evidence. The Regulation 19 evidence does not demonstrate compliance with these

requirements or that site SDA35 remains an appropriate site following publication of the revised flood mapping.

Legality test

If the revised Environment Agency mapping materially altered the understanding of flood risk affecting the site, the Authority should have reviewed the Sustainability Appraisal, Strategic Flood Risk Assessment, Integrated Impact Assessment and site assessment evidence before publication of Regulation 19. Failure to do so would call into question whether the Plan has been prepared in accordance with Regulation 19 and supported by an adequate evidence base.

2. Omission of Watercourse Corridor & required Buffer Zones – Site Plan SDA35 LAA Ref HO057.

Related policies & evidence: SDW1 Protection of the Water Environment; SDG2 Green and Blue Infrastructure; SDA35 Requirement, paragraph 5.

See Appendix 2 for associated maps & pictures.

The site allocation map does not identify the channel created in 2016 as part of the village flood management scheme. Given there is a stream between the middle field and the upper field a culvert would be required. It should be noted that West Sussex Local Authorities are in general, opposed to the culverting of watercourses because of the potential for adverse effect on flood risk and ecology. Consequently, the allocation is based upon an incomplete understanding of the physical constraints of the site and in the opinion of the Parish Council demonstrates that there has unfortunately been a lack of proper evaluation of the suitability of the site for housing development and of reasonably expected due diligence by SDNPA in continuing to promote it through the local plan review process.

Soundness test – unsound as key watercourse on the site has been omitted

- **Not justified** – the allocation is not supported by proportionate or up-to-date evidence because the evidence base does not accurately identify all watercourses affecting the site which is a substantive planning constraint to development.
- **Not effective** – The allocation cannot presently be shown to be effective because the developable area has not been demonstrated once the watercourse, maintenance easements, ecological buffers and drainage infrastructure are properly accounted for.
- **Not consistent with national policy** – the allocation has not demonstrated compliance with national policy on flood risk, biodiversity and sustainable development where the evidence base is incomplete.

Legal test

- If the omitted watercourse was not considered during site assessment or Sustainability Appraisal, the assessment of reasonable alternatives may not have been undertaken using an accurate understanding of the site.

3. Chalk Stream Omission

Related policies & evidence: NPPF Nature Conservation Policies; SDW1 Protection of the Water Environment; Regulation 18 representations

Evidence submitted during the Regulation 18 consultation identified that the watercourse associated with the site forms part of a Chalk Stream system, an internationally rare habitat recognised as a priority for conservation and identified by Natural England.

See Appendix 3 for maps.

The biodiversity and habitat importance of Chalk Streams cannot be over emphasised. These precious features are often described as Englands "rainforests" are globally rare, ecologically rich and deeply connected to the areas natural and cultural heritage. Chalk streams are rivers that are fed from water held within the underlying chalk bedrock. 85% of chalk streams globally are found in the England, particularly Southern England. All rivers, including chalk rivers, are considered to be priority habitats or habitats of principal importance in England.

Healthy chalk streams are the most biodiverse of all English rivers and a vitally important habitat for distinct flora and fauna communities. Chalk streams are often dominated in mid-channel by river water crowfoot and starworts, and along the edges by watercress and lesser water-parsnip. The channel margins feature reed canary grass, reed sweetgrass, drifts of common reed and tall, vibrant stands of the spear-leaved bur reed.

Chalk streams feature abundant and diverse invertebrate communities, such as up winged mayflies, stoneflies, caddis flies and beetles, crustaceans, molluscs, leeches, flatworms and round worms. The Chilterns rivers support nationally rare winterbourne species such as the Scarce purple dun mayfly and Winterbourne stonefly.

Fish life is a key part of the chalk stream ecosystem. A healthy chalk stream holds a good number of fish species such as brown trout, grayling, bullhead and minnow.

Other wildlife found in and around chalk streams include numerous birds such as reed bunting, kingfisher, little egret and grey heron, and mammals such as water voles, otters, and water shrew. There is no explicit reference to chalk streams in the National Planning Policy Framework (NPPF). However, the NPPF does require plan makers to consider:

- water supply and wastewater as key aspects of infrastructure to support the Plan

- taking a proactive approach to mitigating and adapting to climate change taking into account long term implications for water supply
- **enhancing the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution**
- **encouraging development to help improve water quality, taking into account relevant information such as river basin management plans.**
- **protection and enhancement of sites of biodiversity value (commensurate with their statutory status or identified quality in the development plan)**

The NPPF sets out requirements for Local Plans and decision makers to protect and enhance the natural environment. It contains several clear paragraphs relating to National Landscapes. There are strict controls on the scale, type and nature of development that can and should take place within National Landscapes. Decision makers are required to give **great weight** to the conservation and enhancement of National Landscapes, and the scale and extent of development is expected to be limited.

Having regard to the obligations placed in Planning Authorities by the "Levelling-up and Regeneration Act 2023" (which received Royal Assent on 26.Oct 2023), rather than promoting development through an LDP allocation that would adversely impact a chalk stream, Local Planning Authorities should ensure that their plan accurately and adequately addresses the presence of chalk streams in their area.

This is an important way to demonstrate how the Authority is seeking to further the purposes of the National Landscape and recognises the status of these streams as Priority Habitats. The protection and enhancement of chalk streams in their area should be interwoven throughout the SDNPA Local Plan through its vision, objectives, policies, and supporting text.

It is respectfully submitted that the current allocation for housing flies in the face of this required approach and in our opinion further undermines the approach taken by SDNPA to the initial and continued allocation of this site for housing development.

The Regulation 19 evidence base does not appear to assess this feature or demonstrate how the allocation avoids adverse effects upon it. This contradicts the core policies of the park regarding a landscape and nature led approach to planning because of an incomplete evidence base.

Without this assessment, the allocation cannot demonstrate that it has properly considered impacts upon priority habitats or opportunities for nature recovery.

The emerging Local nature recovery strategy has within it/s priorities support for the recovery & resilience of Chalk Streams & their unique biodiversity. The identification of these features is critical to their survival and the movement for protection is growing rapidly.

Naturally occurring measures of flood management are preferred and on this site and the opportunity to provide this protection via the regeneration of the Chalk Stream with related biodiversity gain and alleviation of documented flood impact to existing properties has been overlooked by South Downs National Park. That this

important biodiversity and habitat protection matter has not been given appropriate weight and consideration as a constraint on developing the site for housing is both surprising and concerning.

The allocation fails the tests of soundness because it is:

- **Not justified** as the allocation is not supported by up-to-date evidence base.
- **Not effective** as the allocation has not been supported by an ecological evidence base demonstrating how impacts upon the Chalk Stream have been avoided, mitigated or compensated
- **Not consistent with national policy** – the allocation has not demonstrated compliance with national policy on biodiversity and sustainable development where the evidence base is incomplete and contradicts the approach promoted through the Levelling Up and Regeneration Act 2023

Legal test:

This feature existed before Regulation 19 but was omitted from assessment, therefore the Sustainability appraisal and the habitat considerations & evidence base are incomplete.

Modifications to the plan that could make it sound:

The site allocation should be re-accessed in the light of the omitted watercourse as this was not considered during site assessment or Sustainability Appraisal, the appraisal process may not have evaluated a reasonable alternative based upon the site's actual physical constraints.

4. Access and traffic design, highway safety

Related policies & evidence: NPPF paragraph 116, SDA35 Policy requirements, paragraph 1, South Downs Transport Study; School Road & the B2139 Junction.

See Appendix 4 for access and traffic report commissioned by Amberley Parish council.

The proposed point of access is immediately adjacent to the junction of School Road and the B2139 where visibility constraints already exist.

During Regulation 18 the Parish Council commissioned an independent traffic assessment which concluded that the existing junction presents highway safety concerns.

The Regulation 19 Plan has not demonstrated, through updated transport evidence, that a safe access can be achieved for the allocation without unacceptable impacts upon highway safety and substantial highway intervention.

Soundness test

The allocation fails the tests of soundness because it is:

- **Not justified** – the allocation is not supported by proportionate or up-to-date evidence of a traffic survey at an established dangerous junction.
- **Not effective** – it has not been demonstrated that the policy can be delivered with regards to safe access and significant highway works
- **Not consistent with national policy** – the allocation has not demonstrated compliance with national policy on flood risk, biodiversity and sustainable development where the evidence base is incomplete.

Legal test

If the allocation relies upon highway improvements that have not been demonstrated to be deliverable, the evidence supporting the allocation is incomplete and the assessment of deliverability may be unsound.

Modifications to the plan that could make it sound – move access to B2139.

5. Settlement Boundary

Related policies & evidence: Environment agency Updated flood risk assessment, Amberley Neighbourhood plan policy HD6 Housing site allocation, & Policy EN2 local green space.

The extension of the settlement boundary is unsound. The allocated development site and the previous allocation for housing is documented within the Amberley Neighbourhood plan and in the timeframe 2016 to 2032, this was for 6 additional homes. Since then, the site has been achieved and 28 houses have been built within the community, exceeding the quota by 22. Housing needs at the time of the Neighbourhood Plan were identified as a small number of affordable houses and a smaller units for older people to downsize to so they can remain in the community, this has already been achieved.

Regarding the boundary extension at the SDA35 site, the Parish Council undertook a village wide survey as part of the regulation 18 consultation which had a 44% return rate, so the data collected is highly representational of the views of the community. Survey respondents were strongly against the use of the top and middle fields for housing, with 94% against a development of 45 houses and 87% against 25 houses, a significant rejection of any housing on the site.

The proposed settlement boundary extension has not been supported by evidence demonstrating why land outside of the settlement boundary should now be allocated despite the objectives of the Neighbourhood plan

Since adoption of the Neighbourhood Plan, housing delivery has already exceeded the level anticipated for Amberley. The Regulation 19 Plan has not demonstrated

why further expansion into undeveloped countryside is necessary to meet identified local needs.

Soundness test –

Not Justified - The boundary extension is not justified because no proportionate evidence has been provided demonstrating why expansion beyond the existing settlement boundary represents the most appropriate strategy when compared with reasonable alternatives elsewhere within the National Park

Development outside of the settlement boundary is not justified, it does not meet any established local need.

6. Settlement sustainability

Related policies & evidence: Settlement facilities Assessment; integrated Impact Assessment, South Downs Transport Study (Nov 2024). See Appendix 5.

See Appendix 5 for Settlement Facility Assessment excerpt.

The SDNPs own Settlement Facilities Assessment identifies Amberley as one of the least sustainable settlements within the National Park, yet the new Local Plan does not explain why SDA35 has nevertheless been selected in preference to potentially more sustainable alternatives within the evidence base.

Residents are heavily dependent on private cars for access to employment, shopping, health services and secondary education. The allocation conflicts with the stated strategy of directing growth to sustainable locations.

Reference https://www.southdowns.gov.uk/app/uploads/2026/03/Agenda-Item-10_Appendix-4.pdf

Soundness test – unsound

- **Not justified** – The Settlement Facilities Assessment identifies Amberley as a relatively unsustainable settlement, Consequently the allocation is not positively prepared or justified by the Authority's own spatial strategy
- **Not consistent with national policy.**

7. Site Plan. Middle field SDA35 LAA Ref HO057SDA35

Related policies & evidence: NPPF paragraph 172, SDA35 site Policy requirements, paragraph 4, SDW2 – Flood risk management, EA flood mapping 2026.

As stated within feedback on the new flood zone mapping, the available evidence does not demonstrate that the middle field is capable of accommodating development without unacceptable flood risk or ecological impact as it contains areas within flood zones 2 & 3. The low accuracy of the mapping data set means that the risk is worse. Building on the middle field will compound flooding issues already experienced in the village and the plan does not demonstrate that the field remains capable of accommodating development.

The allocation fails the tests of soundness because it is:

- **Not justified** – the allocation is not supported by any recognised or documented local need.
- **Not effective** – The Regulation 19 evidence base is missing key information of flood risk and watercourses missing from the plan.
- **Not consistent with national policy** – the allocation has not demonstrated compliance with national policy on flood risk, biodiversity and sustainable development where the evidence base is incomplete.

The allocation should be reconsidered using an updated evidence base. Should those assessments demonstrate that the identified constraints cannot be satisfactorily addressed, the allocation should be modified or deleted

Modifications to the plan that could make it sound:

During regulation 18 feedback the community survey conducted by Amberley Parish Council revealed that 87% of the respondents were against a development of 15-25 houses on the site. The Parish Council stands by this mandate.

Within the same survey a question was posed, asking that if development were to take place upon only the bottom field of the SDA35 site, would this be acceptable and 59% of respondents agreed it would.

The mandate from the community to Amberley Parish Council is to reject development on the site. However, if the site were to proceed there would be more local support if the application was modified to contain development in the lower field and constrain the settlement boundary extension to that field only, leaving the top and middle field out of any boundary extension. This would leave the remaining fields as green space for the community consistent with the Amberley local plan 2016.

Overall conclusion

Individually, each of the matters identified within this response presents significant concerns regarding the soundness of Allocation SDA35. Collectively, they demonstrate that the allocation is based upon an incomplete and outdated evidence base which has not been comprehensively reassessed following the emergence of new flood risk information, the identification of omitted watercourses and Chalk Stream constraints, and unresolved questions regarding highway access and settlement sustainability.

Consequently, the allocation has not been demonstrated to be **justified, effective or consistent with national policy**. Furthermore, there is a substantial question as to whether the Sustainability Appraisal and supporting evidence have been updated sufficiently to satisfy the legal requirements for plan preparation.

The appropriate remedy is for Allocation SDA35 to be withdrawn or substantially modified pending a comprehensive reassessment of flood risk, environmental constraints, transport impacts and reasonable alternatives.

Appendix 1– New flood mapping

Flood Zones at Regulation 18, SDA35 outlined in red



During Regulation 18, flood zones did not show the site as being at risk in early 2025

Flood Zones at Regulation 19

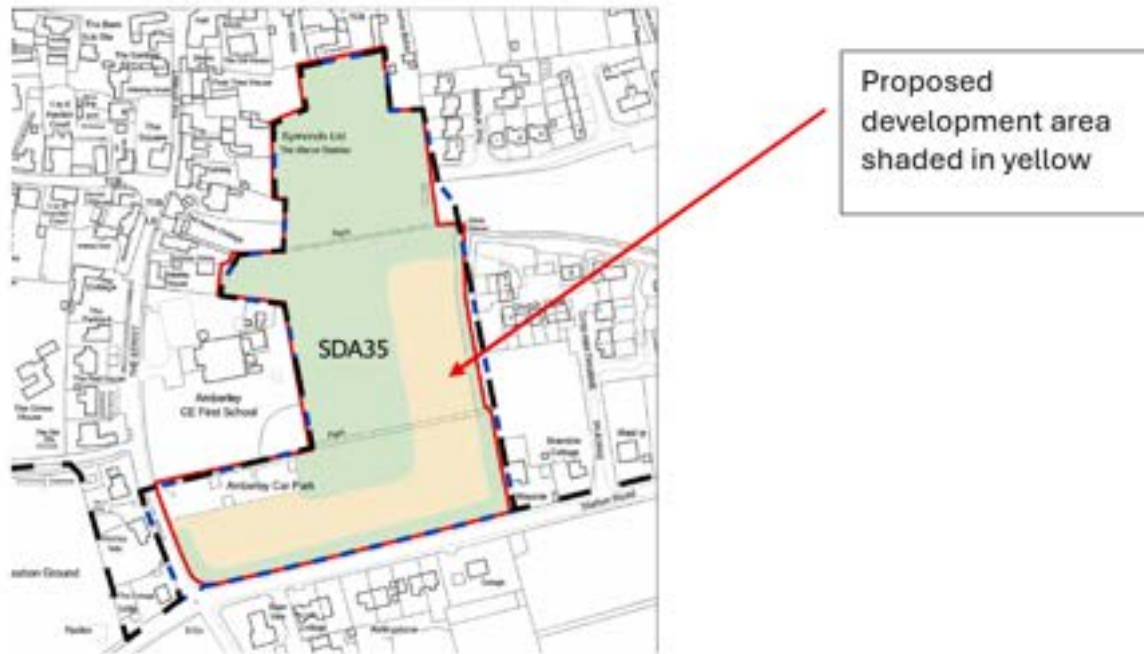
Environment Agency Flood mapping 2025

https://flood-map-for-planning.service.gov.uk/map?encodedPolygon=ohagp%aB_tmh_k%ovk{E_xeP_cjE-juyA-dxmE-wePnt}R_juyA&seg=rsd,pd,hr&cz=503217.1,113039.3,17.816386



This revised flood mapping highlights flood risk issues in School Road and Newland Gardens and perhaps provides explanation to the shape of developable area at Reg 19.

SDNP MAP of SDA35, within the plan



Overlay of revised flood zone with SDa35 map

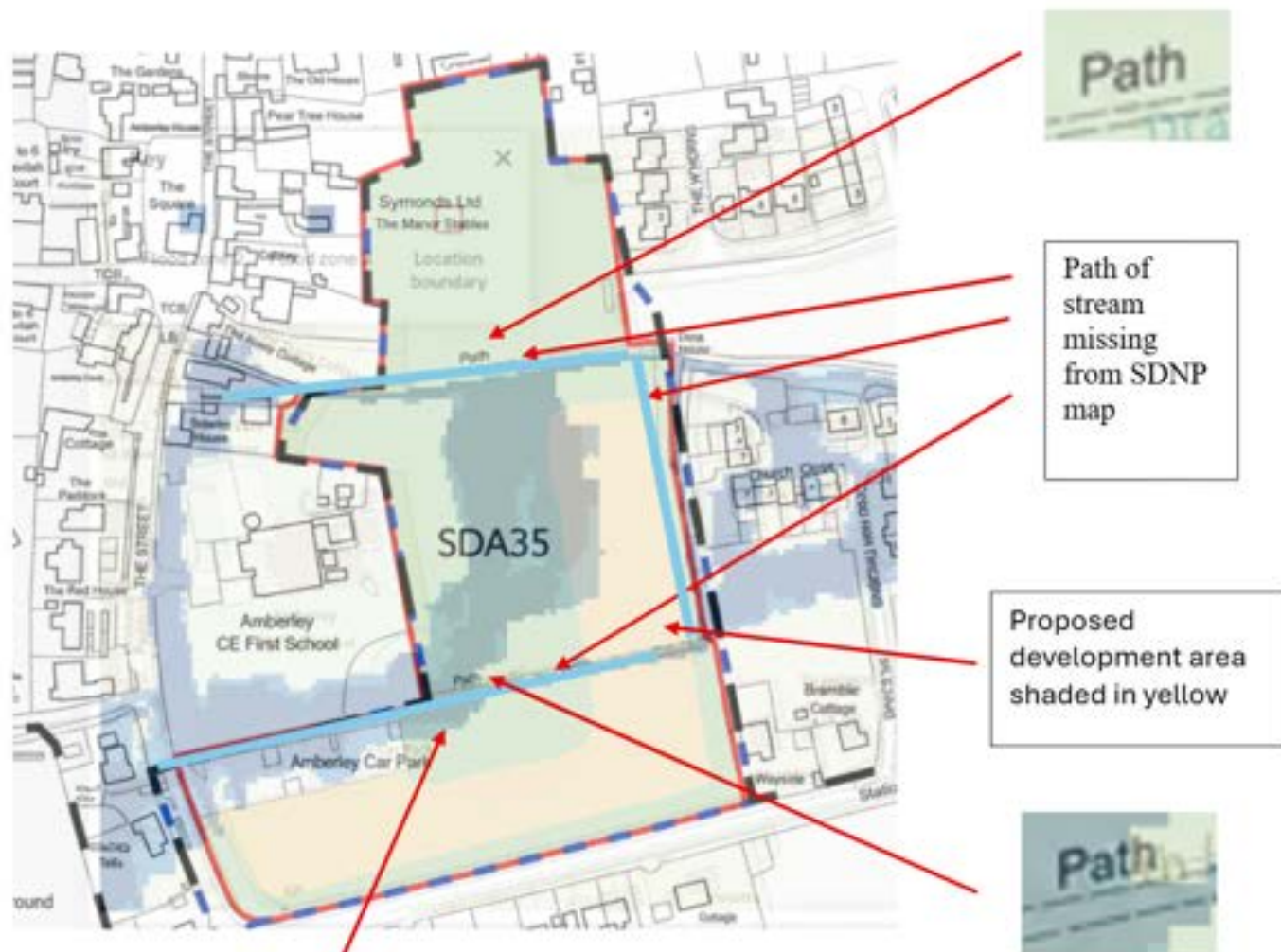


New Dataset for LIDAR MAPPING

Through the resources of a local expert group a new LiDAR dataset for the site has been created, using professional grade drone-mounted LIDAR **accurate to around 2cm**, collected and analysed by the Director of a land surveying company with 40 years' experience. The new topographic model is therefore more accurate than data used by the national flood mapping and shows that land **inside** the developable area sits at the same height as land in flood zone 3. (this is shown by contour lines (lines of equal height) running across the Flood Risk 3 areas into the developable area. This information shows that the developable area is highly likely to be impacted by flooding and negatively impacting the stream running through the site.

Appendix 2 – Omission of Watercourse Corridor & required Buffer Zones

Overlay of EA flood mapping with SDNP SDA35 site map, missing water courses indicated, North course labelled as 'path'.



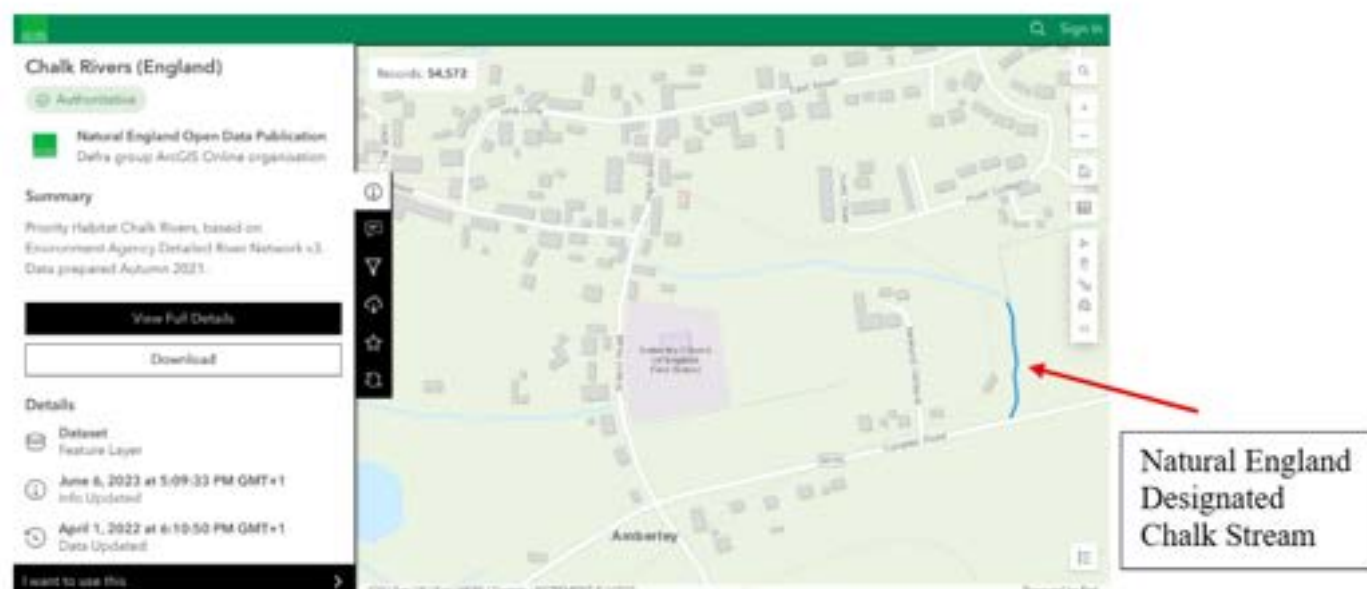
Watercourse running next to path



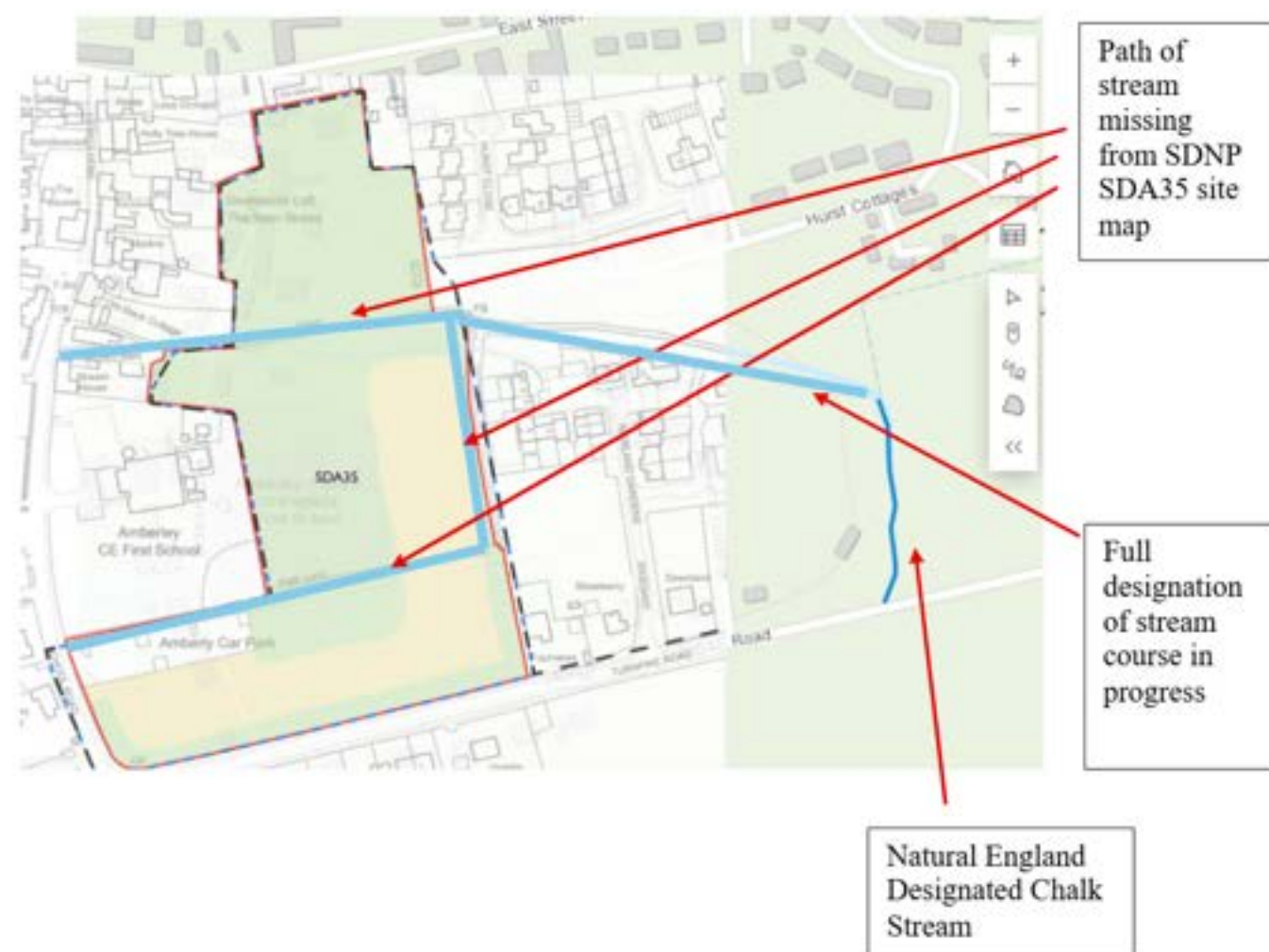
Appendix 3 – Chalk Stream

Natural England Chalk Stream Mapping for Amberley

https://naturalengland-defra.opendata.arcgis.com/datasets/1bb8e710c8254e8fa33e95c7bc13229e_0/explore?location=50.907770%2C-0.532825%2C17



Overlay of site map showing chalk stream on the SDA35 site



West Sussex nature recovery Strategy

<https://www.sussexnaturerecovery.org.uk/media/2025/12/Part%20%20LNRS%20West%20Sussex.pdf>

The SDNP are heavily involved in the Local Nature Recovery Strategies in West Sussex and so are fully aware of the importance of Chalk Stream and protections.

West Sussex Local Nature Recovery Strategy: Part 2

Priorities for nature’s recovery – Summary Table

Table 1: Priorities for nature’s recovery in West Sussex

Details of the actions (measures) that together can help achieve these are shown in the section below.

Coastal Habitats C1. Support the expansion, restoration, enhancement and creation of coastal and inter-tidal habitats.	Lowland Heathland & Sandstone Outcrops H1. Expand, enhance and better connect lowland heathland and associated habitats. SO1. (Sandstone outcrops). Enhance the unique biodiversity of the sandstone outcrops of the High Weald.	Urban Nature U1. Create and connect ne the urban environment, for and people. U2. Enhance the value for buildings and other blue/g
Farmed Landscape & Soils FL1. Create and enhance opportunities for wildlife within the farmed landscape. SL1. Enhance soil habitats and their health to support biodiversity and improve ecosystem services.	Rivers, Streams & Aquifers R1. (Rivers and river systems). Support the recovery of our rivers and river systems*, their health, biodiversity and natural functions. R2. (Chalk streams). Support the recovery and resilience of our chalk streams and their unique biodiversity. A1. (Aquifers). Support the health and function of our aquifers.	Nature Networks: Prote corridors & more wildli S1. Support the expansion network of protected sites. Cor1. Enable landscape re- landscapes and large-scal this supports biodiversity, - landscape character. Cor2. Safeguard and enha
Species-rich Grasslands G1. Restore, expand, connect and enhance species-rich grasslands.		
Woodland, Hedgerows & Scrub W1. Enhance our existing woodland habitats*.		

RIVERS, STREAMS & AQUIFERS

Priority: R2 (Chalk streams)

Support the recovery and resilience of our chalk streams and their unique biodiversity

What does success in 10 years look like?

- For the small, chalk streams which emerge from the steep scarp slope of the chalk downs, effort has been focused on safeguarding these streams from physical modification and retaining and enhancing their natural chalk stream characteristics.
- Where necessary, the natural functions of chalk streams have been increased through actions to restore the following: stream slope (improving longitudinal connectivity); an intact gravel bed; dynamic interaction with fallen trees and living riparian trees; interaction with the floodplain (lateral connectivity); ecological processes and habitats that support their key species (fish, insects, mammals and plants).
- Chalk streams are benefitting from sensitive land use within the wider catchment and are buffered from pollutants, supporting recovery of water quality. In particular, actions have been taken to reduce sediment load entering these streams.
- Winterbournes (seasonally flowing chalk streams) have been identified and there is greater awareness of their presence and function. Efforts have been focused on retaining and restoring these streams where required.

Appendix 4 – Traffic Survey

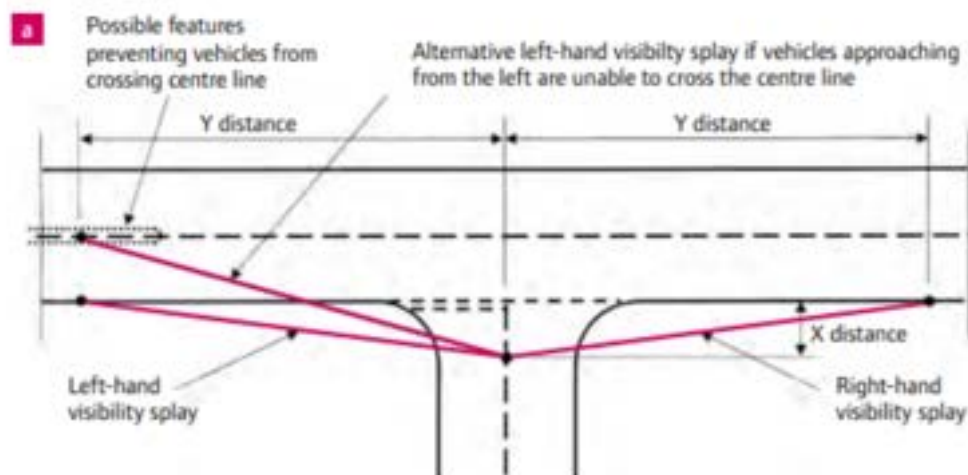
For Amberley Parish Council

Report on Transport Planning Issues – Proposed SDNP Development of Sites HO37 and HO38

Proposed Vehicle Access via Hurst Cottages

The current proposal for vehicle access to the proposed development via Hurst Cottages is not viable as construction traffic and residents of the new development would need to access the site by driving through Amberley.

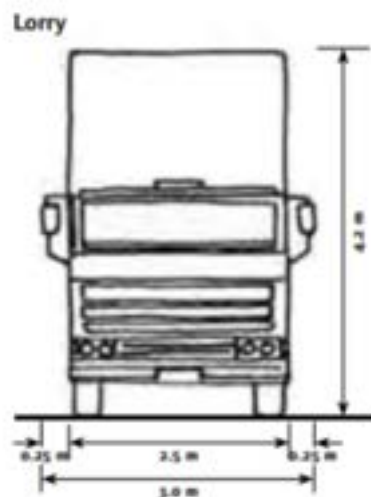
- 1) The junction of the B2139 and School Road is classified as unsafe as it doesn't meet the minimum sight line requirements of being able to see at least 90m (Y distance) in each direction from 2.4m (X distance) back from the junction¹. Therefore, any proposal to increase traffic through this junction would increase the risk of accidents.



- 2) Additionally, there is a width restriction warning of 6' 6" on School Road- the sign for this is located near the car park. This translates to 1.98m. A lorry, according to the Manual for Streets, is 2.5m wide, 3m including wing mirrors².

¹ Design Manual for Roads and Bridges (DMRB)/CD109 - Highway Link Design.

² Manual for Streets, Department for Transport



- 3) For much of School Road, High Street and East Street there is either no footpath or the footpath less than 2m wide. Where no footpath is present it is advised that the road traffic is less than 100 vehicles per hour².
- 4) There is a pinch point in High Street just south of the Village Shop which is 4.39m at its narrowest. Additionally, there are often cars parking there for the shop and the village bus has had problems getting through.
- 5) At the corner of the Black Horse Pub, where East Street meets High Street, there is a 90-degree blind corner with lack of forward visibility. According to the Manual for Streets, the visibility should be 25m minimum in 20 mph zone. Therefore, any proposal to increase traffic through this corner would increase the risk of accidents.
- 6) There may be air quality and noise concerns relating to increase traffic around the school and children's play area in Hurst Cottages.
- 7) Hurst Cottages approach has cars parked on one side of the road which will be a problem for increased traffic going two ways. The kerb-to-kerb road width is 4.75m at its narrowest. This is an issue for waste collection vehicles where the minimum road width recommendation is 5m.²
- 8) Given there is a stream between the middle field and the upper field a culvert would be required. It should be noted that West Sussex Local Authorities are in general opposed to the culverting of watercourses because of the potential for adverse effect on flood risk and ecology.

Additional Observations

Tree preservation orders should be placed on trees present in the upper and middle fields.

Appendix 5 – Excerpt from the SDNP Local Plan regulation 19 integrated impact assessment:

Agenda Item 10 Report NPA25/26 Appendix 4

AMBERLEY

		National Park's landscape character, functionality and perception and special qualities.	Biodiversity and contribution to nature recovery.	Historic environment heritage assets and their settings and cultural heritage.	Impacts of climate change and to address the causes of climate change.	Protection & Sustainable Use of Resources	Employment and Economy	Promote equality of opportunity and the elimination of discrimination	Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	Efficient transport network	Good quality homes, suitable to their need. New affordable homes.	Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Site appraisal	Stage A											
Site	Ref											
East Street Farm	MAJ25	-	-	-	?	0	+	-	+	?	++	?
Settlement Appraisal	Stage B											
Amberley		+	-	+	?	-	-	-	+	0	+	+

General Comments

There is only one Proposed Submission Local Plan site in **Amberley**. Therefore, an in-combination assessment has not been made

Amberley is within the National Park and has high landscape value. There are significant areas of nature conservation designation. There is a conservation area and areas within a flood zone. There is a train station, albeit not central to the settlement. This is neutral. Due to limited offers of employment opportunities and facilities – the settlement scores negatively for employment and equalities.

Excluded sites: HO035, HO036

Rejected sites: HO053

Table A – Assessment key

Significant likely adverse effect	-++	Option in conflict with the objective and unlikely to be acceptable.	Significant likely positive effect	++	Option would significantly help with achieving objective
Likely adverse effect	-	Option in conflict with the objective.	Likely positive effect	+	Option/policy/site would help with achieving objective
Neutral/no effect	0	Option would neither help nor hinder the achievement of the objective	Uncertain effects	?	More information needed

Note:

Amberley scores poorly against sustainability criteria. Residents are heavily dependent on private cars for access to employment, shopping, health services and secondary education. The allocation conflicts with the stated strategy of directing growth to sustainable locations.