



Regulation 19 Consultation response

Appendix

This appendix is provided by Amberley Parish Council to be used in conjunction with councils' regulation 19 response document in relation to site SDA35 within the SDNP Plan.

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Part 1 – Flood Zone Mapping

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Part 4 - Access and traffic design, highway safety

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Appendix 1– New flood mapping

Flood Zones at Regulation 18, SDA35 outlined in red

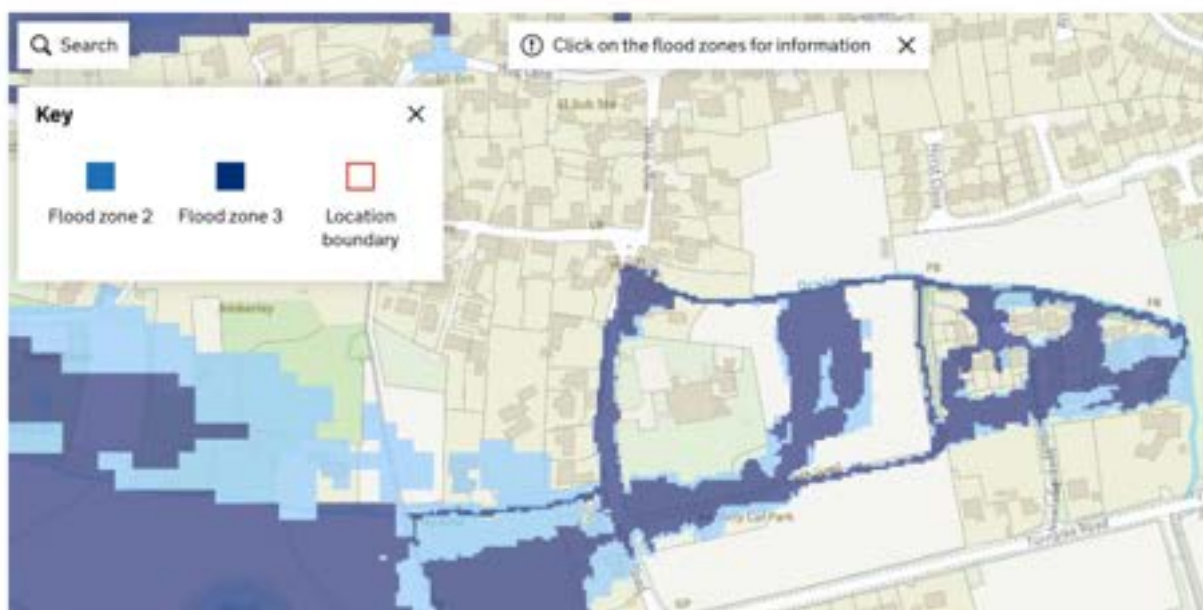


During Regulation 18, flood zones did not show the site as being at risk in early 2025

Flood Zones at Regulation 19

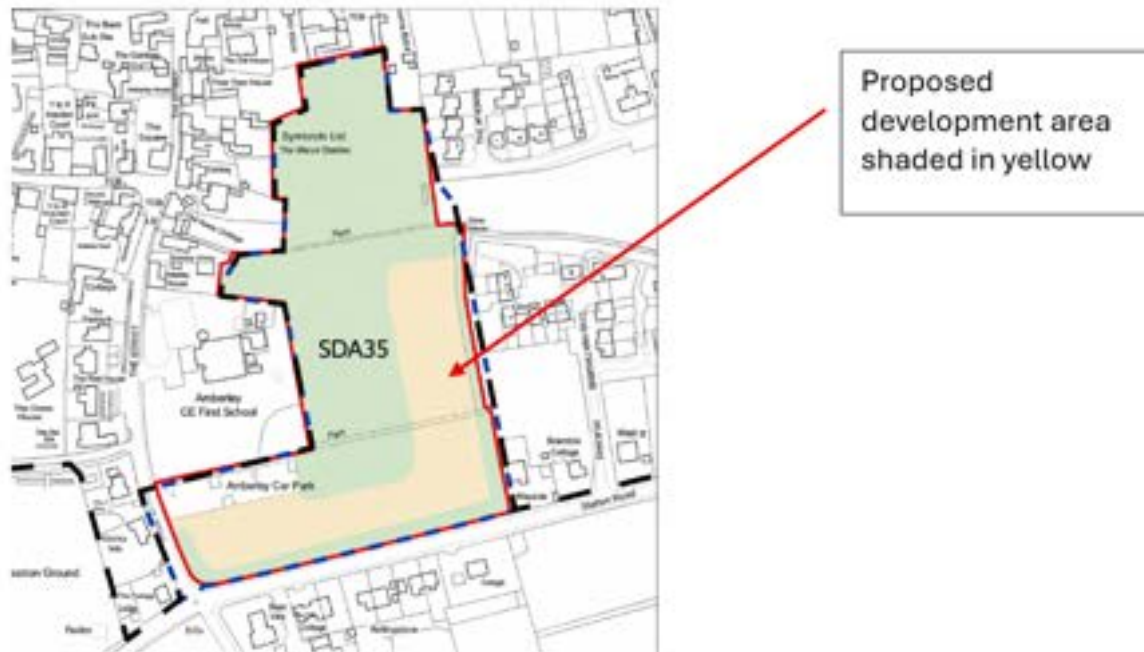
Environment Agency Flood mapping 2025

https://flood-map-for-planning.service.gov.uk/map?encodedPolygon=ohagp%aB_tmh_k'ovk{E_xeP_cjE~iuyA~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

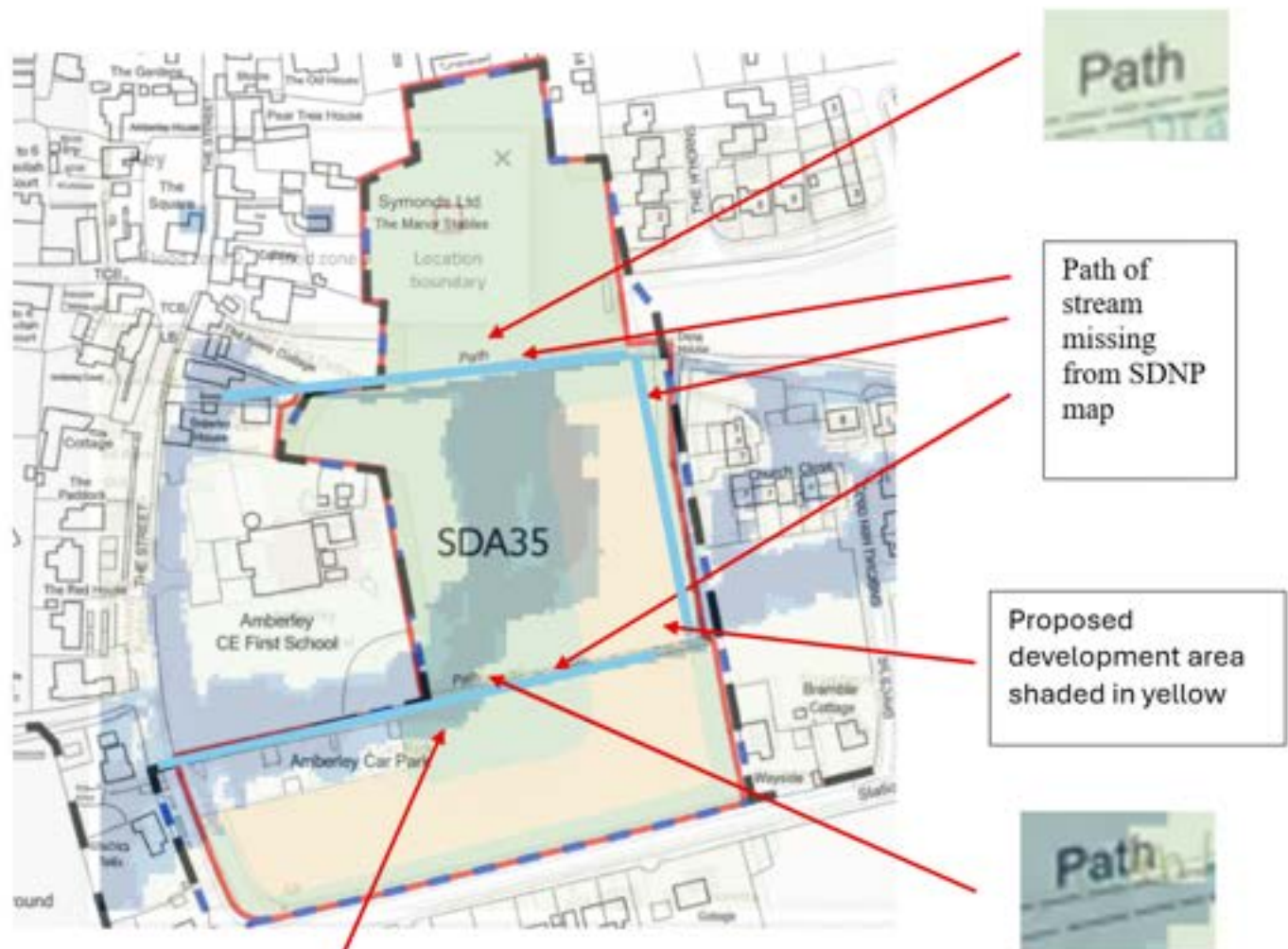


New Dataset for LIDAR MAPPING

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



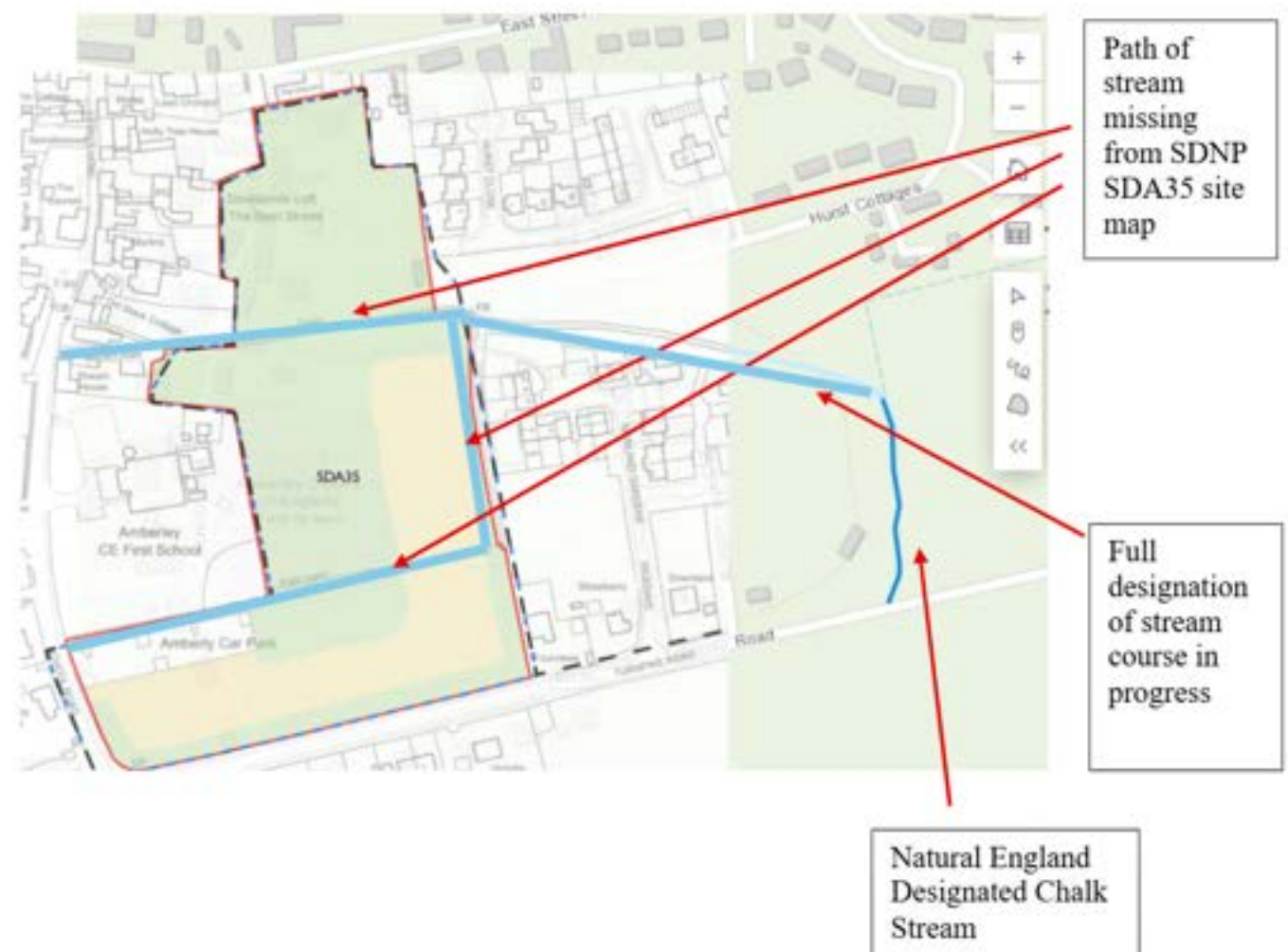
Appendix 3 – Chalk Stream

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%202%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 new green spaces in the urban environment, for people and people. U2. Enhance the value for buildings and other blue/green infrastructure.
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: Protected corridors & more wildlife SN1. Support the expansion network of protected sites. Cor1. Enable landscape rewilding and large-scale restoration to support biodiversity, landscape character. Cor2. Safeguard and enhance landscape character.
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.
- Winterbourns (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

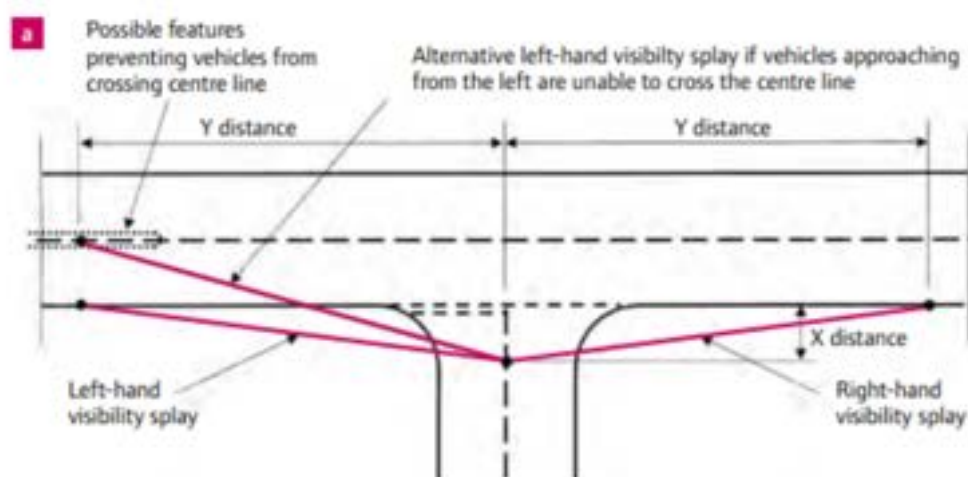
For Amberley Parish Council

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.

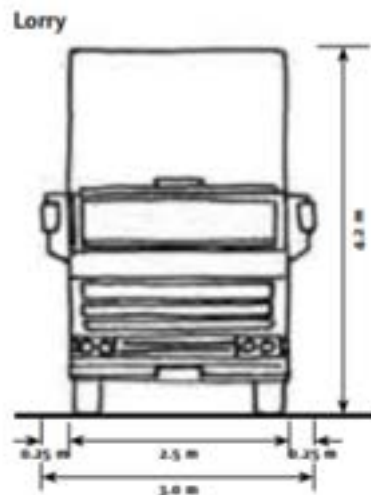
- 1) The junction of the B2139 and School Road is classified as unsafe as it doesn't meet the minimum sight line requirements of being able to see at least 90m (Y distance) in each direction from 2.4m (X distance) back from the junction¹. Therefore, any proposal to increase traffic through this junction 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 Steet 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 NPA25/26-26 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	Public 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	SD04/15				?	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: HD035, HD036

Rejected sites: HD053

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.