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14 October 2021

Our Ref:
LY/APC/1812/20211014

Your Ref:
AL/107/21/PL

Project No:
APC/1812

Dear Mr Davis

**Re: Application in respect of land at Woodgate Centre, Oak Tree Lane, Woodgate
PO203GU (Application Reference AL/107/21/PL)**

I make these representations on behalf of Aldingbourne Parish Council in respect of the above application and confirm that Adams Hendry Consulting Ltd is instructed to act on the Council's behalf.

As you are aware, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

With regards to the application site, the relevant part of the Development Plan comprises the Arun Local Plan 2011-2031 (adopted July 2018) and the Aldingbourne Neighbourhood Plan 2019-2031 (adopted July 2021). Aldingbourne Parish Council reviewed its Neighbourhood Plan following the adoption of Policy H SP1 of the Arun Local Plan (ALP) which allows for additional non-strategic allocations (at least 1,250) to be made through emerging Neighbourhood Plans.

The application site falls within the strategic allocation referred to within the plan as the Barnham, Eastergate, Westergate (BEW) site, which will collectively provide at least 2,300 dwellings over this period. The BEW Framework Masterplan document allocated this specific site for "medium density" residential development as part of one of the five peripheral urban extensions. The general principle of residential development on this site is therefore in accordance with the Development Plan. Notwithstanding this, the Parish Council have a number of concerns in relation to the scale and nature of the development proposed along with environmental and transport impacts. These are set out in more detail below.

As a general point, the Parish Council is concerned that the parish is already experiencing the impact of large-scale developments in the area including the BEW, strategic allocation and that the necessary infrastructure to support this level of growth is not being provided in a timely manner. Existing services and facilities in the Parish are already operating over capacity. Whilst this particular site is not allocated for specific infrastructure and no objections have been raised by the West Sussex Section 106 division in relation to infrastructure provision, the Parish Council wish to highlight the guidance set out within the BEW Masterplan document on page 65 with regards to phasing and delivery. This seeks to

ensure infrastructure will be delivered in a timely way in order to mitigate the impact of development. In light of this, the Parish Council consider that in the case of any forthcoming planning consent for this site the requirements highlighted by the Wessex County Council Planning Services Division would need to be met in full and that the key issues raised by the Highways Authority and Highways England will need to be fully addressed.

Sustainable Transport

In terms of policy context, criterion (a) of Policy H SP2 (Strategic Site Allocations) of the Arun Local Plan seeks to ensure proposals would integrate appropriately with surrounding communities through providing for connectivity of transport modes including walking and cycling. Page 31 of the BEW Masterplan also acknowledges that public rights of way run across the site. The opportunity must be taken to ensure the proposed development links to this existing network. This reflects the stated objective of the Masterplan in relation to enhancing connections and wider integration and also the High Level Development Principle of reducing the need to travel, promoting sustainable transport and creating walkable neighbourhoods (along with Arun's Strategic Objectives referred to under section 15.1 of the Arun District Local Plan).

With regards to this particular proposal, as highlighted in the advice from the Highways Authority (comments dated 17 September), the proposal does not seek to remedy the existing situation in terms of the very limited provision for cyclists. It would therefore appear to be the case that until the rest of the BEW is implemented, cyclists and pedestrians will be reliant upon using the existing A29 when travelling north or south. Aside from issues around safety and convenience, these arrangements would be contrary to both local and national policy requirements relating to the need to encourage a shift away from travel by private car. In addition to this the submitted plans include insufficient information in relation to provisions for pedestrian and cycle connections to the routes to the north and east of the site. Policy GA2.1 of the Neighbourhood Plan identifies opportunities to upgrade local footpaths to cycleway standard and connect these to the County Council's proposed route from Barnham to Chichester. This includes path 296 which runs past the application site. It is not clear how these connections would be provided for in the future and this would be at odds with the objectives of Policy GA2 of the Aldingbourne Neighbourhood Plan which seeks to support proposals which improve and extend the existing footpath and cycle path network, allowing better access to the local amenities and services.

With regards to the site itself, opportunities to design for pedestrians and cyclists have not been incorporated (an issue which was also highlighted by the Highways Authority). This is clearly contrary to the guidance set out within page 63 of the Arun District Council Design Guide, along with the guidance on page 82 of the BEW Masterplan which states that new development should prioritise the needs of pedestrians, cyclists and public transport over those of motorists. As acknowledged within the Masterplan, prioritising pedestrians and cyclists means creating routes that are safe, direct, convenient and accessible for people of all abilities.

Wider Transport Impacts

The key issues highlighted within the West Sussex Transport Plan include road congestion during peak hours which causes disruption and air pollution on various routes including the A29. The plan also recognises that the rights of way network and general pedestrian / cycle facilities are disjointed and suffer inadequate signage, crossings and surfacing, which in turn are known to have harmful impacts on the economy.

With regards to transport impacts in general it is noted that both the Highways Authority and Highways England (comments dated 10 September) raise a number of concerns which include the likely traffic impacts upon the junction between Woodgate Road and the existing A29 when railway crossing gates are down (having regard also to additional traffic from recently approved development in the locality). Additionally, it would appear that traffic impacts prior to the new A29 alignment have not been addressed.

In the absence of clear information on the current / baseline situation it would not be possible to assess the impact of increased traffic volumes resulting from the development. The traffic modelling undertaken would also appear inadequate based upon the feedback received from Highways England, particularly when having regard to the fact that other committed developments in the locality (and the operation of the adjacent railway crossing) do not appear to have been considered.

As noted by Highways, it is unclear how the proposed widened footway on the north side of Woodgate Road will be achieved without impacting upon the carriageway itself. Any reduction in width to the carriageway could impact upon the local highway network.

As it stands there is insufficient information to rule out harmful impacts upon both the local and strategic highway network and the development would therefore be contrary to Policy T SP1 of the Arun District Local Plan.

Biodiversity

Paragraph 98 of Government Circular 06/2005 (Biodiversity and Geological Conservation) makes it clear that the presence of a protected species is a material consideration in assessing development proposals. It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established *before* planning permission is granted. Planning conditions to require that ecological surveys are carried out should therefore only be used in exceptional circumstances. As highlighted by the Ecology Advisor, Chichester District Council (comments received 10 September), the submitted ecological survey work in this case recommends that further survey work should be undertaken to enable harmful impacts upon the ecological interests of the site to be ruled out. This includes surveys in relation to bats, Hazel dormice and reptiles. Whilst the submitted ecological survey concludes that the site does not provide optimum habitat for the species for foraging bats, this would appear inconclusive in light of the further survey work recommended. As it stands, this lack of information would amount to a material consideration which would justify refusal.

Lighting

The submitted lighting assessment does not reflect or acknowledge the ecological sensitivities of the site. It also does not acknowledge the suggested measures on page 75 of the interim ecological report and it is also not clear to what extent the 5m lighting columns on the eastern edge of the development are essential or how they might impact upon surrounding habitats.

Lighting assessments should take due consideration of the overall visual impact that the lighting will have on the landscape. This may include ground surface reflectivity, the number of lights, the daytime intrusion and the general overall footprint of the lighting. The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Consequently, it is important to control the lighting coming from significant developments. The design of buildings should reduce the impact of light spill from internal lighting or suitable mitigation measures should be put in place and should be by any relevant ecological survey work. There is currently no information to suggest that this has been considered as part of the overall design.

Design / Layout

From reviewing the submitted Design and Access it would appear that the main influence on the overall design relates to the objective of making efficient use of the site and meeting internal space requirements, as opposed to a consideration of the character of the local area. The design objectives set out within the BEW Masterplan seek to preserve the very distinctive identities of the 3 villages of Barnham, Eastergate and Westergate. However, the proposal would not appear to meet these objectives on account of its scale and general design quality.

Woodgate Lane, which lies immediately adjacent to the site, predominantly comprises single storey bungalows. Whilst Oak Tree Lane has a number of 2 storey dwellings, there appears to be no significant precedent for 3 storey flats in the locality. With this in mind, the proposed 2.5 and 3 storey units would appear to be at odds with the prevailing character and scale of development in the immediate area. This would be contrary to the guidance set out on page 86 of the Design Guide which seeks to ensure the scale and massing of development responds to the existing townscape and landscape.

Whilst an attempt has been made to introduce elements of traditional materials, it is not clear whether the proposed weatherboarding (one of the prevailing materials of the proposal) would be natural timber or an artificial alternative. Page 108 of the Design Guide promotes the use of natural, sustainable materials wherever possible. Furthermore, weatherboarding itself is not specifically referred to within the Design Guide as one of the key materials which define the character of Arun district.

The majority of the proposed dwellings would have wide spans, and bulky, complex rooflines, resulting in a very top heavy, suburban form which fails to reflect the semi-rural character and identity of the locality. The very steep pitches and various blank facades which prevail throughout the development would be at odds with the guidance set out on page 90 of the Design Guide. This document recognises that the character of a settlement or place is defined by roof pitch and form to a high degree. The prevailing roof forms in the District are simple and double pitched gable ends or hipped roofs. New developments should respect such characteristics, while remaining in line with the location, context and character of development. In general, roof form should be simple and express and articulate the form of the building rather than obscure it. High pitch angles should not be used. Simplicity in roof form should not be compromised.

With regards to the proposed layout of the development tree planting has not been integrated throughout the development (an approach which is advocated within both the National Design Guide and Arun District Design Guide). The layout and density of the development also does not appear to acknowledge its location on the rural edge of the settlement and does not have sufficient regard to page 52 of the Design Guide which states that development density should decrease with distance from the centre of a settlement, to ensure that development relates sensitively to its setting and addresses the edges of the site.

Environmental Impact Assessment

The proposed development falls within the description at 10(b) of Schedule 2 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("urban development projects") and would include more than 150 dwellings over a site area excess of five hectares. In the case of such projects listed in Schedule 2, the local planning authority should consider whether it is likely to have significant effects on the environment.

It is understood that a formal request for a screening opinion in respect of this development has been submitted to Arun District Council (reference AL/108/21/ESO) and that this is pending a decision. Having reviewed this application, it would appear to be the case that the accompanying screening report is largely a duplicate of the planning statement submitted as part of the main planning application. With this in mind, the Parish Council therefore have concerns that this does not offer a clear basis for assessing the development against the criteria set out under Schedule 3 of the Regulations in relation to the characteristics and location of the proposal and also the nature and extent of any impacts (having regard to other projects in the locality). In short, the information which accompanies the screening request would not enable any of the potentially harmful impacts relating to transport, ecology and landscape to be ruled out.

Policing Service

The Parish Council share the concerns raised by Sussex Police (comment dated 20 September) in relation to the significant demand additional housing developments across Arun are placing upon the police

service. These demands would not feasibly be covered by taxation and the proposed development would incur significant additional costs as a result of the need to recruit additional staff. As highlighted in the response from Sussex Police, the general principle of securing developer contributions towards the police service has been supported in very recent appeal decisions in the locality and nationally. The Parish Council therefore consider that any new residential development on this site should meet the requirements set out in the response from Sussex Police.

Conclusion

To summarise, the Parish Council recognises the significant threats to biodiversity and specifically to bat and moth populations within the parish posed by development and it is determined to protect the countryside within the neighbourhood plan area. Having regard to this and the concerns raised above, the Parish Council consider that the proposed development would have a potentially harmful impact upon the ecological interests of the site and the wider area, contrary to Neighbourhood Plan Policy EH12 and Local Plan Policy ENV DM5.

Due to the significant concerns highlighted above in relation to the impacts upon both the local and strategic highway network, the Parish Council consider that no significant development should be undertaken until the new A29 has been constructed.

The proposal would fail to meet the objectives of both the Arun Design Guide and BEW Masterplan documents in relation to ensuring that high quality is present at every stage of development, from initial design to final delivery, respecting the distinctive historic environment of Arun and ensuring development responds well to its site and setting. In addition to this the proposals would fail to maximise and priorities sustainable patterns of transport and would not sufficiently mitigate harmful impacts upon the wider road network. This is contrary to Local Plan Policies H SP2, T SP1, H SP2, T DM1 and ENV SP1, Neighbourhood Plan Policy GA2 and the High Level Development Principles of the BEW Masterplan.

For these reasons Aldingbourne Parish Council raise an objection to the proposed development.

Yours Faithfully

Liz Young
Principal Planning Officer

CC. Aldingbourne Parish Council