

From: Claire Potts
Sent: 21 September 2017 17:26
To: Planning.Responses
Cc: Karl Roberts; Neil Crowther
Subject: FW: BEW applications - update and S106 and BEW Advisory Group

Please could the attached letter be uploaded to both AL/15/17/PL and AL/111/16/OUT

Regards

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Directorate of Place, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Save the environment - think before you print.

From: [REDACTED]
Sent: 21 September 2017 13:05
To: Claire Potts
Cc: Garry Sleat; Alison Crabb; Cllr. John Charles; Cllr. Keith Ballard; Cllr. Christopher Hughes
Subject: BEW applications - update and S106 and BEW Advisory Group

Dear Claire

Please find attached a letter covering the Community Infrastructure requirements of Barnham and Eastergate. This letter serves to cover both:

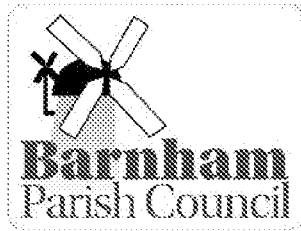
- The Cala Homes application and your email below
- The action from the 13th July BEW Advisory Group Meeting for the Parishes to describe their needs with regard to S106

I trust you are well

Best regards

Chris.A

Chris Allington
Chair



21st September 2017

For the attention of:

Claire Potts, Strategic Development Team Leader

Dear Claire

Your email dated 8th September 2017 BEW applications - update and S106 and BEW Advisory Group Action

The Parish Chairs, as joint signatories to this letter representing the Barnham and Eastergate Neighbourhood Plan, herein provide our Parish Council's response to your question regarding local infrastructure contributions that could be sought as part of the current planning applications and the BEW Strategic Allocation. This letter does not alter our previously communicated planning objections but is a pragmatic assessment of local community infrastructure needs on the assumption that many developments will successfully get planning permission.

It is practically very difficult for two parishes with volunteer councillors to provide a fully developed proposal but this letter describes an overarching evidence based and costed strategy. Its purpose is to be the framework for agreeing s106 contributions for specific developments.

Last time we were asked for such input (the Dandara Application at Fontwell) officers advised the ADC Planning sub-committee that our requests were not CIL compliant and they were excluded on that basis without any discussion with the parishes. We hope that more dialogue with developers and ourselves will take place this time. After reading this letter if ADC still have a view that our proposals are not CIL compliant we would hope that discussion and dialogue will follow as the developers we have spoken to seem comfortable with the reasonableness of our local needs.

Our understanding of a CIL compliant S106 is:-

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind
- Pooled funding 'pots', intended to provide common types of infrastructure for the wider area, are limited to five S106 agreements

Our thinking regarding the Parish (Neighbourhood Plan) local 'Community' infrastructure that should be funded by S106 contributions is summarised in the Community Infrastructure Needs Summary section of this letter. The objective of showing you this detail, which includes items unrelated to S106, is to illustrate our overarching strategy and to assist ADC to ensure that all local infrastructure requirements are covered by the ADC Local Plan. Detail to support our costings is provided in a section later in this letter.

As the detail of the proposals contained in this letter are agreed and refined we request that ADC include them as policies and robustly challenge developers, particularly at appeal, such that if planning permission is secured on appeal the Inspector rules that the developer must meet their community infrastructure obligations. ADC/NPs losing an appeal is clearly not ideal but losing an appeal and community infrastructure investment is totally unacceptable from a Localism and Neighbourhood Planning perspective.

Clerk: Alison Crabb
Parish Office, Barnham Community Hall, Yapton Road, PO22 0AY

Clerk: Garry Sleet
9 Hedgeway, Felpham, Bognor Regis, West Sussex, PO22 7QY

Community Infrastructure Needs Summary

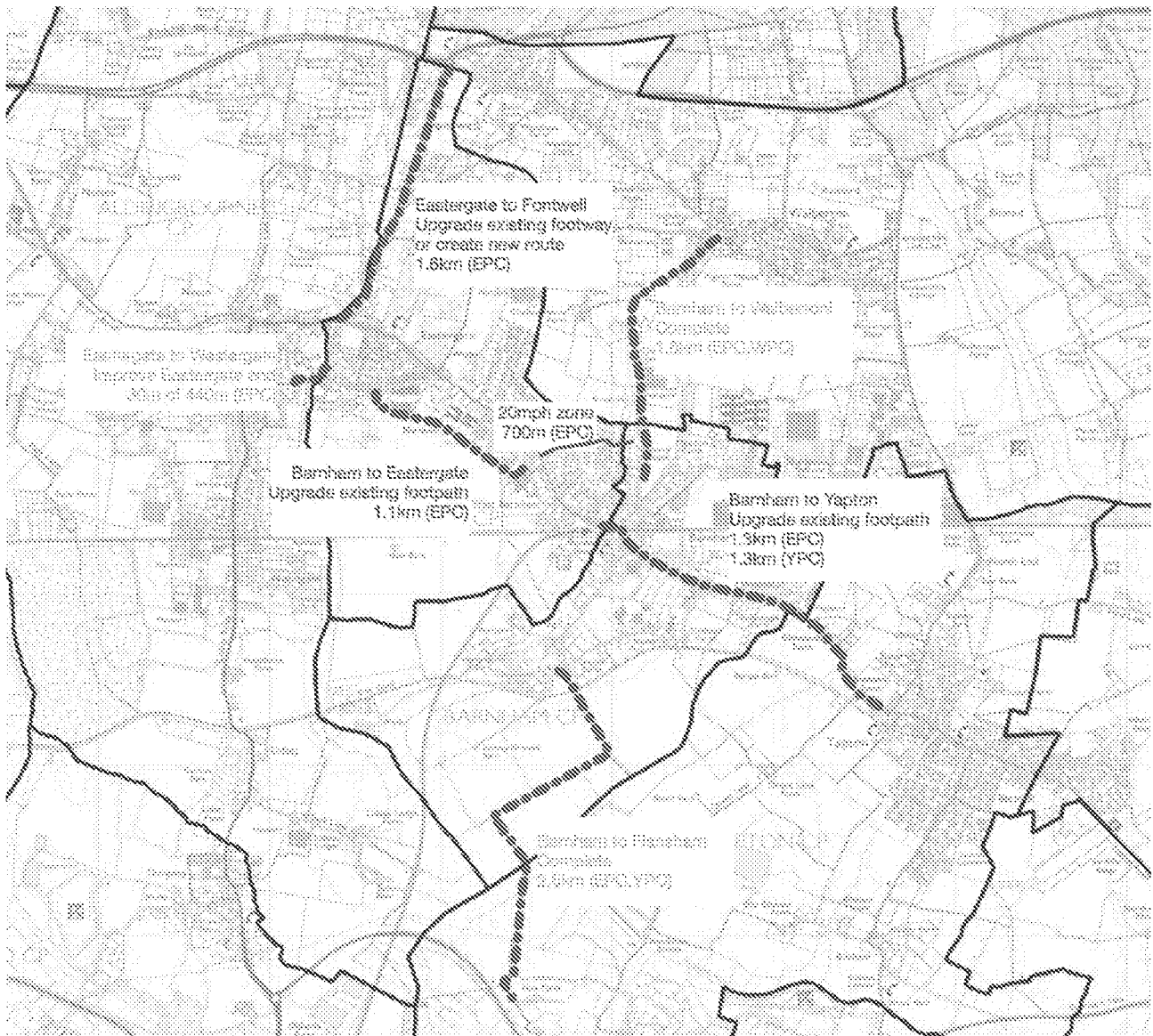
<i>Community Infrastructure Item</i>	<i>Commentary</i>
<i>Flooding and drainage</i>	This is a matter of significant concern to the communities of Barnham and Eastergate but the obligations for providing sufficient capacity for existing and new housing is a matter for ADC, Southern Water, Environment Agency and others. The Utility companies should also have their infrastructure investment plans properly synchronised with those of the developers. Of importance to Barnham and Eastergate is sewerage and ground water control. There is a significant infrastructure deficit in the Barnham and Eastergate area which needs urgent action before more houses take it further beyond the precipitous capacity problems that it already has.
<i>Green infrastructure</i>	This is a matter for the emerging Local Plan to ensure that the villages retain their distinctive characters. Policies regarding this are covered in the made Barnham and Eastergate Neighbourhood Plan. Local green spaces for community use (e.g. allotments, orchards, play spaces) are covered under the 'Social Infrastructure' heading below
<i>Housing design, density and mix</i>	Policies regarding this are covered in the made B&E NP. We remain concerned particularly about the quality of design proposed by many developers (unimaginative, densely packed brick boxes) and Local Housing for local people. There is a need for local housing for local people and we propose that developments include specific housing allocations for local parishioners.
<i>Transport</i>	WSCC and Highways England must allocate money for highways infrastructure changes and their plan should be properly synchronised with those of the developers so that key infrastructure is in place before the inevitable problems of community growth without infrastructure.
<i>Through traffic</i>	Measures need to be implemented to ensure that traffic passing through the villages (centres and residential areas) is calmed, controlled yet free flowing for local people. This is not a matter for the B&E NP but is of considerable concern to the community. The villages must not become a 'rat-run' when more strategic routes become congested.
<i>Regional access and potential bottlenecks (e.g. Access to the A27 from the villages</i>	We are strongly of the view that there is an inadequate strategy to ensure that the north-south routes can connect to the A27 without causing significant congestion at peak times. This is not a matter that can be solved by the parishes through S106 but is critical highways infrastructure that must precede further growth in housing in the villages.
<i>Multi-modal access between the villages.</i>	To encourage walking, cycling and safer routes to schools the network of cycle (multi-modal) paths needs to be completed. We believe that the network shown on the 'Multi-modal Routes Map (see later section of this letter) is broadly the same as the WSCC strategy. The incomplete elements need to be implemented and all developments should fund connections to these key routes and contribute to the funding pot for the construction of these routes. Our cost estimates are based upon the construction cost of the Barnham to Walberton link which was completed in 2016. To complete all the links the cost is estimated to be £1.46m plus any land acquisition cost or exceptional construction costs albeit we have included the known cost at St Philip Howard School for the Barnham to Eastergate link.

Barnham railway station	Barnham is already blighted by commuter car-parking on adjacent residential estate roads and in spaces for shoppers. A strategy needs developing to address this and, we propose, could have the following elements :- • Interim (i.e. before more car-parking capacity can be developed in say 5 years) ○ Community warden with the ability to carry out parking enforcement - £35,000 per year (covers both BPC and EPC) ○ Free morning/evening peak mini-bus service on developments greater than 1km away from Barnham Station. ○ Land allocated away from the village centres for parking with free mini-bus service (park-n-ride) • Strategic ○ A solution needs to be found to provide car-parking capacity to handle both in-commuting as well as the local community. Such a solution is out-with the technical expertise of the parishes but is likely to include decked car-parking; land reserved to the south of the railway station or a park-n-ride solution from a remote site. ○ Implementing a Controlled Parking Zone (CPZ) in the residential estates near the station is a possibility but our current view is that this would not receive community support due to the annual costs of residential parking permits. Potentially new developments could fund this cost such that current residents do not have to pay. At say £100/year for 1,750 houses this would be £17,500/year. We do not have the technical knowledge to assess the capital cost of implementing a CPZ.																																																
Social Infrastructure	The principle adopted by both parishes is to operate the core public halls and playing fields as financially sustainable social enterprises. These cannot fund capital investment. Each social enterprise is funded by annual Parish grants, other fund-raising, volunteers and revenues from community and private hire. Our plans relate to the need to accommodate 900 houses that have planning permission (44% increase on 2011 census) and the expected growth through the Local Plan (Parish Allocation) and the BEW Strategic Development.																																																
Open Space	We have assessed the open space by applying the Fields in Trust Guidelines. The current position, which includes the school pitches in the parishes, based on the 2011 Census shows a 4.7Ha deficit albeit some of this will be mitigated by the Ormiston Academy School in Aldingbourne Parish. <table><tr><td></td><td>Pitches</td><td>All out-door</td><td>LEAP</td><td>NEAP</td><td></td></tr><tr><td>Current Provision in B&E</td><td>4.71 Ha</td><td>3.77 Ha</td><td>0.21 Ha</td><td>0.07 Ha</td><td></td></tr><tr><td>Standard for 2011 Population</td><td>4.83 Ha</td><td>6.44 Ha</td><td>1.01 Ha</td><td>1.21 Ha</td><td></td></tr><tr><td>Current Surplus/(Deficit)</td><td>{0.1Ha}</td><td>{2.7Ha}</td><td>{0.8Ha}</td><td>{1.1Ha}</td><td>{4.7Ha}</td></tr></table> Forecasting the population growth based on developments this deficit rises to 11.3Ha. <table><tr><td></td><td>Pitches</td><td>All out-door</td><td>LEAP</td><td>NEAP</td><td></td></tr><tr><td>Current Provision in B&E</td><td>4.71 Ha</td><td>3.77 Ha</td><td>0.21 Ha</td><td>0.07 Ha</td><td></td></tr><tr><td>FT Standard for Forecast Population</td><td>7.18 Ha</td><td>9.57 Ha</td><td>1.50 Ha</td><td>1.79 Ha</td><td></td></tr><tr><td>Forecast Surplus/(Deficit)</td><td>{2.5Ha}</td><td>{5.8Ha}</td><td>{1.3Ha}</td><td>{1.7Ha}</td><td>{11.3Ha}</td></tr></table> Solutions need to be found to providing more land for open space and Barnham Community Park should be upgraded to create drained and level junior sports pitches (football and cricket) - £270,000		Pitches	All out-door	LEAP	NEAP		Current Provision in B&E	4.71 Ha	3.77 Ha	0.21 Ha	0.07 Ha		Standard for 2011 Population	4.83 Ha	6.44 Ha	1.01 Ha	1.21 Ha		Current Surplus/(Deficit)	{0.1Ha}	{2.7Ha}	{0.8Ha}	{1.1Ha}	{4.7Ha}		Pitches	All out-door	LEAP	NEAP		Current Provision in B&E	4.71 Ha	3.77 Ha	0.21 Ha	0.07 Ha		FT Standard for Forecast Population	7.18 Ha	9.57 Ha	1.50 Ha	1.79 Ha		Forecast Surplus/(Deficit)	{2.5Ha}	{5.8Ha}	{1.3Ha}	{1.7Ha}	{11.3Ha}
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Community/Village Halls	The halls in our villages provide a range of services including community pre-schools; provide space for over 35 community user groups and; are available for community private hire. We also believe that the halls should also provide local provision of other services including access points for libraries and such things as NHS mother and baby services. Our halls would need to expand as follows: • Barnham Community Hall – Operated by Barnham Community Trust sustainably but is already at full capacity. Three major projects to support community growth include:- ○ Dedicated youth wing 120sq.m (NIA) – £0.46m ○ Dedicated community pre-school 180sq.m (NIA) – £0.69m ○ Sports changing and social facilities – 80sq.m (NIA) - £0.3m • Eastergate Parish Hall, Sports Field and Pavilion – A new manager has been appointed and a project manager is being advertised for. These roles are being funded by EPC to modernise the facilities; catch-up a maintenance deficit and to build a master-plan for the two sites that increases the capacity. To increase capacity the following is required: ○ Master-planning – This will be complete by 2018 and costs circa £10k. EPC is expecting to fund this. ○ The upgrading and maintenance programme has been costed at £61k. EPC is expecting to fund a year of this albeit circa 40% will increase capacity and accessibility. This proportion is CIL compliant (£24k) ○ Dedicated community pre-school 180sq.m (NIA) – £0.69m ○ Addition of small hall at 60sqm (NIA) – 0.23m • The Cluster (Aldingbourne, Barnham and Eastergate Parishes are proposing a community facilities manager for five years given the local infrastructure programme management that will be required in all three parishes as the community grows in the new housing. This has been costed at £32k/year.
Local Equipped Area for Play (LEAP)	These are for children who are beginning to go out and play independently. They should be within five minutes walking time and positioned by a pedestrian route that is well used. Existing provision is good in Barnham and Eastergate with two that are parish maintained (Barnham Community Hall and Eastergate Playing Field). New developments should be required to provide further LEAPs within the development.
The Neighbourhood Equipped Area for Play (NEAP)	Mainly for older children but with play opportunities for younger children too. Within 15 minutes' walk from home and positioned by a pedestrian route that is well used. There is poor provision except at Barnham Community Hall which was grant and volunteer funded. At least one more needs to be developed at Eastergate and we would suggest a multi-use games area (MUGA) - £100k.
Allotments and Orchards	The developer with planning permission EG/71/14 has committed this to the Barnham and Eastergate Neighbourhood Plan but development has not commenced yet There are no land allocations in Barnham for these purposes and this needs to be rectified.

Strategic Allocation	The above rows in this table relate primarily to the growth in housing in the villages without considering the BEW Strategic Allocation. The following local infrastructure will be required, as an estimate, should this allocation be made:												
Transport													
Through traffic	The A29 realignment will need to be designed to ensure that traffic passing through the villages (centres and residential areas) is calmed, controlled yet free flowing for local people. This is not a matter for the B&E NP but is of considerable concern to the community. The villages must not become a ‘rat-run’ when more strategic routes become congested.												
Regional access and potential bottlenecks (e.g. Access to the A27 from the villages	We are strongly of the view that there is an inadequate strategy to ensure that the north-south routes can connect to the A27 without causing significant congestion at peak times. ADC needs to press Highways England to ensure that a solution is found with sufficient capacity												
Multi-modal access between the villages.	The Strategic Allocation needs to connect into the proposed network. Our estimate is: 4km of multi-modal pathway (£1.02m plus inflation)												
Barnham railway station	The Strategic Allocation will certainly trigger the need for a strategic car-parking solution at Barnham Station. This will need to provide car-parking capacity to handle both in-commuting as well as the local community. Such a solution is out-with the technical expertise of the parishes but is likely to include decked car-parking; land reserved to the south of the railway station or a park-n-ride solution from a remote site.												
Social infrastructure	The following would be our first pass view: 1,200 sqm (GOA) Community Hall - £3.7m plus inflation - Open Space in the following categories: <table><tr><td>Open Space Type</td><td>Pitches</td><td>All out-door</td><td>LEAP</td><td>NEAP</td><td></td></tr><tr><td>FTT Standard for Forecast Population</td><td>8.39 Ha</td><td>11.19 Ha</td><td>1.75 Ha</td><td>2.10 Ha</td><td>23.4Ha</td></tr></table> - Land for: - Allotments - Community Orchard - Development and maintenance of Green Corridors, including landscaping and improvements to legal and permissive rights of way.	Open Space Type	Pitches	All out-door	LEAP	NEAP		FTT Standard for Forecast Population	8.39 Ha	11.19 Ha	1.75 Ha	2.10 Ha	23.4Ha
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Multi-modal Routes Map



Detail of Local Infrastructure Costings

Excluding Strategic Allocation

Transport				
Actual Build Cost (2015) for Reference				
Multi-modal cycle-ways				
Barnham to Walberton	1.6 km	£209 k/km	£335k	
Forecast Build Cost (5yrs inflation @4%)				
Eastergate to Westergate (BPC)	0.03 km	£255 k/km	£8k	
Barnham to Eastergate (EPC)	1.1 km	£255 k/km	£280k	
Land purchase			£120k	
Orchard estate 20mph zone (EPC)	0.7 km	£255 k/km	£178k	
Eastergate to Fontwell (EPC)	1.6 km	£255 k/km	£408k	
Barnham to Yapton (BPC)	1.3 km	£255 k/km	£331k	
Land Purchase/Culvert contingency			£132k	
			£1.46m Not for Parish	
Barnham Railway Station Parking				
5 year funding Community Warden		£35 k/yr	£175k	
5 year Mini-bus service		£20 k/yr	£100k	
5 year CPZ funding		£18 k/yr	£88k	
			£363k Interim for Parish	
Social Infrastructure				
Community/Village Halls	Gross Outside Area (GOA)	Net Internal Area (NIA)	Actual Build Cost (2013) for Reference	
Current Halls				
Barnham Community Hall	584 sq.m	467 sq.m	£1.47m	£2,518 /sq.m
Eastergate Village Hall	364 sq.m	291 sq.m		
Eastergate Pavilion	250 sq.m	200 sq.m		
	1198 sq.m	958 sq.m		
Forecast Build Cost (5yrs inflation @4%)				
Proposed Expansions				
Barnham Pre-school	225 sq.m	180 sq.m	£0.69m	£3,063 /sq.m
Barnham Youth wing	150 sq.m	120 sq.m	£0.46m	£3,063 /sq.m
Barnham sports changing	100 sq.m	80 sq.m	£0.31m	£3,063 /sq.m
Eastergate capacity increase			£0.02m	
Eastergate pre-school	225 sq.m	180 sq.m	£0.69m	£3,063 /sq.m
Eastergate small hall	75 sq.m	60 sq.m	£0.23m	£3,063 /sq.m
	775 sq.m	620 sq.m	£2.40m	
NEAP				
BCH MUGA 2012 (For reference)		£82k		
Eastergate MUGA			£100k	
Playing Fields				
Upgrade Barnham Community Park			£270k	
Total Parish for Housing Growth exc. Strategic Allocation			£3.13m	

Strategic Allocation

5ay decked car-park at Barnham Station	£12 k/space	250 space	£3.00m Not for Parish
4km multi-modal path	4.00 km	£250 k/km	£1.02m Not for Parish
Community Hall	1200 sq.m	£3,063 /sq.m	£3.68m
5 LEAPS			£0.40m
2 NEAPs			£0.20m
		Total	£8.30m
		Parish S106	£4.28m

Reasonableness Test

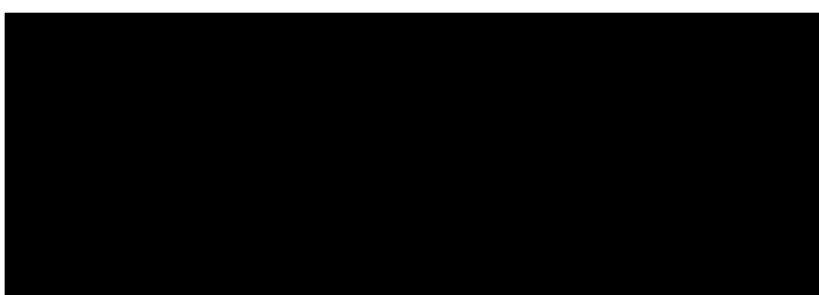
We have applied the following tests to broadly assess reasonableness and proportionality:

Community Growth exc BEW Strategic Allocation	
Increase in housing over 2011 census	84%
Community/Village Hall	65%
ADC CIL Briefing March 2015	
Houses to be built in B&E	1,100
Affordable Housing	30%
Avg House size	150 sq.m
ADC proposed rate	£100 /sq.m
Percentage to parish	25%
	£2.89m
BEW Strategic Allocation	
ADC CIL Briefing March 2015	
Houses to be built	1,000
Affordable Housing	30%
Avg House size	150 sq.m
ADC proposed rate	£50 /sq.m
Percentage to parish	25%
	£3.94m
TOTAL	£6.83m

Excluding the BEW Strategic Allocation, the S106 ask of the parishes is £3.1m and with the BEW Strategic Allocation it is £6.8m. The CIL briefing in March 2015 indicated that the BEW Strategic Allocation would only contribute £50/sq.m. If it delivered £100/sq.m, as for all other Residential Zone 2, the calculation would yield £10.8m which would fund the total package allowing for losses where planning permissions have been won on appeal with no local infrastructure contribution.

Clearly there will remain a local infrastructure deficit in Barnham and Eastergate which will require us to prioritise and source other forms of funding by leveraging S106 as match to secure grants.

Yours sincerely



Chris. J Allington
Chair Eastergate Parish Council

Keith Ballard
Chair Barnham Parish Council

Cc Garry Sleet, Clerk Eastergate Parish Council
Alison Crabb, Clerk Barnham Parish Council
Cllr John Charles
Cllr Christopher Hughes