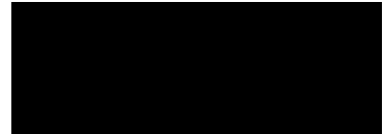


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Mr R Temple
Directorate of Place
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

8 December 2017

Dear Mr Temple

Re: AL/115/17/OUT - Wings Nursery Lidsey Road Aldingbourne PO20 3SU

We write in regards to the consultation response from the WSCC Highways Authority dated 27th November, which raised an objection to the application that we feel requires a detailed response.

Attached to this letter is therefore a Technical Note from our Transport Planning Consultants (Russell Giles Partnership Ltd) which resolves or robustly rebuts each point raised by the Highways Authority. Amended highways engineering plans are provided to resolve relevant points; we would appreciate if you were able to make the Highways Authority aware of this additional evidence and review their consultation response accordingly.

This covering letter does not repeat the contents of the Technical Note but summaries the key points here and refers back to the original application submission below.

- **Sustainable location** - The NPPF identifies that different measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The impact therefore has to be considered relative to its context - in this particular case on the rural / urban fringe. It is recognised that the developments location means that accessibility credentials are not optimal, this does not however mean that the level of accessibility is inappropriate or that the residual cumulative impact is 'severe' and therefore contrary to the NPPF as identified in this response.
- **Highways safety for pedestrians and cyclists** – Pedestrian footways provide connectivity to the majority of services in Westergate. The applicant is happy to contribute to an upgrade of these footways if necessary which can be secured by Section 106 obligation and should not form a reason for refusal.
- **Access** - The Highway Authority's assertion of a 'severe' impact relies on the identification of anomalous hypothetical scenarios. There is insufficient factual evidence to suggest that there are material safety and operational concerns in reality.

- **Traffic Impact** - The additional queuing traffic associated with the proposal is estimated to be in the order of 2 vehicles per hour. The extent of this impact cannot be defined as severe.

The Highways Authority objection refers multiple times to pre-application advice dating back to 2014; this previous advice can be afforded no weight in the consideration of this application given it is now over three years old, related to a different proposal, did not at the time have the benefit of detailed designs and was unsupported by a highway assessment. All of these matters have now been addressed and the previous conclusions of the Highways Authority are not relevant and require a fresh objective perspective.

Furthermore, the objection appears to rely heavily upon two appeal decisions at the Woodgate Centre dating back to 2011 and 2012. As set out in the Planning Statement supporting this application (at page 18) these two appeal schemes have only limited comparability to the proposal at the Wings given they were significantly larger in scale, significantly further from the A29 and located in a very different landscape area. The appeal decisions are now over 6 years old and pre-date the fundamental change in the planning policy position relating to housing land supply and the consequent presumption in favour of sustainable development currently in force. More recent and relevant appeal decisions have found that locations on the outskirts of Westergate (further from local facilities in some cases) are in fact sustainable locations and have been granted planning permission on that basis.

Summary of previous evidence submitted: sustainability of location

The submitted Planning Statement at paragraph 6.29 refers to the NPPF in that it generally resists isolated new houses in the countryside but recognises that, in rural areas, housing is still needed and should be located where it would enhance or maintain the vitality of rural communities. It recognises that opportunities to maximise sustainable transport solutions varies between rural and urban areas, indicating that a lower level of sustainability may be expected and consequently may be acceptable, in areas such as Westergate.

The whole settlement of Woodgate is located immediately adjacent to the site, south of the railway line and existing houses are found on all sides of the site. The submitted Transport Statement found the site is within walking distance of Woodgate and Westergate village local services and amenities including local bus stops which can be accessed via the footway flanking the A29 Lidsey Road. The full extent of Westergate, Eastergate, Fontwell, Walberton, and Barnham are within a cyclable distance of the site, including Barnham railway station.

Summary of previous evidence submitted: relationship to development plan

The Planning Statement provided evidence that adopted settlement boundaries can be afforded very limited weight in the consideration of this application due to the lack of a five year or three-year housing land supply. The NPPF requires that in these circumstances the presumption in favour of sustainable development must be applied and permission should be granted without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or where specific policies in this Framework indicate otherwise.

Furthermore, the post-examination Arun Local Plan will rely heavily on unallocated, rural sites to deliver the Council's housing strategy, including its Non-Strategic Sites requirement of 1,250. Sites will be drawn from the Council's HELAA and The Wings application site is identified as deliverable within the HELAA and therefore likely to be relied upon as one of the windfall sites the Council has already resolved to invite an application on in the short term.

The strategic allocation of Policy H SP2c (5,950 homes to 'Inland Arun') near to the application site was found to be 'a particularly sustainable location' in the Sustainability Appraisal carried out to inform the emerging Local Plan. The Council's pre-application advice to the applicant in 2016 confirmed that upon allocation of the strategic location, the application site would likely be considered more sustainable.

We appreciate that this information will need to be shared with the WSCC Highways Authority to allow the opportunity to update the consultation response. In the meantime, if there is anything further the local planning authority may need from us to demonstrate that the accessibility and highways safety elements of the application are acceptable, please do let us know.

Yours sincerely,



Gareth Giles MRTPI

WHALEBACK