

Mr. Michael Eastham
Planning Policy & Conservation
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date: 25 June 2018
Our ref: 14677/SSL/JL/15983452v1
Your ref: AL/20/18/OUT

Dear Mr. Eastham

Representations in relation to application (ref. AL/20/18/OUT) for outline planning permission for up to 27 dwellings at Bridge Cottage & The Old Cottage Lidsey Road, Lidsey, PO22 9PH

We write on behalf of our clients, The Church Commissioners for England, CEG and Hanbury Properties, who own/control the majority of land in the proposed Barnham Eastergate Westergate (BEW) strategic allocation (draft Policy H SP2c SD5) in the emerging Local Plan. Our clients represent the majority of landowners in the BEW Southern Consortium, comprising the majority of land to the south of the Barnham Road.

The landowners have been working collaboratively with landowners and promoters in the Northern Consortium (north of the Barnham Road) to promote the site through the Local Plan process and have an illustrative masterplan, which establishes a vision for the site and its integration with the wider area.

As the application site partially lies within the proposed strategic allocation at BEW, we are disappointed that neither the landowner or its agent made contact with the BEW Consortium prior to submission of this planning application to inform us of its intentions and share its illustrative masterplan. This is particularly so against the backdrop of emerging Local Plan Policy H SP2 which requires strategic site allocations to be comprehensively planned. We are also somewhat surprised that there has been no pre-application engagement with either the Council or the local community.

Whilst our clients do not object to the principle of residential development on this site, there are two matters that we would like to bring to the Council's attention.

First, we do not support the Illustrative Site Plan or Block Plan (drawing ref. 1749-02B / 1749-03). The planning application is in outline form with all matters reserved, except access, the Illustrative Site Plan and Block Plan fails to offer east west connections into the wider BEW site as required by emerging Policy H SP2c SD5 and does not successfully tie into the pedestrian and cycle connections in the wider area. It is important that these matters are considered prior to determination to ensure that the proposed development does not miss an opportunity to integrate with the wider BEW masterplan at the appropriate time.

Policy H SP2c SD5 requires a Westergate Link cycle scheme, in addition to further cycle routes to/from Bognor Regis (Part g(v)) and Policy H SP2 requires comprehensive planning. It is therefore essential that the

proposed development demonstrates that this is achievable at the outline stage, particularly given that access is not a reserved matter, and that suitable conditions are attached to any permission to ensure this important infrastructure is secured.

Secondly, whilst the applicant has included proposed heads of terms within its Planning Statement, these fail to acknowledge the wider infrastructure that is required in connection with developments coming forward within the emerging site allocation area. As detailed in the emerging Local Plan Policy H SP2c SD5 and supported by the Infrastructure Delivery Plan (emerging Local Plan Evidence base ref. PEDP5), this includes proportionate contributions towards healthcare, education, library, recreation and transport improvements, namely the delivery of the realigned A29, which is a major benefit of the proposed BEW allocation. It is essential that all development coming forward within the site allocation boundary contribute proportionally to its share of infrastructure costs for the whole. The risk of not doing so would be to undermine the viability of the wider site which could compromise housing, particularly affordable housing, delivery.

The applicant references the Housing Implementation Strategy (HIS) (2017), which sought advanced applications on sites identified as deliverable in the HELAA. However, it is important to note that this was caveated in the HIS, which stated this only applied where *“they will not prejudice the emerging local plan and / or infrastructure delivery”*. The importance of infrastructure delivery and a comprehensive approach is reiterated in the draft Local Plan, as set out above.

Whilst not yet adopted, the emerging Local Plan, particularly Policy H SP2c SD5, must be given considerable weight reflecting that it has been through examination and the Inspector’s report is expected imminently, with adoption anticipated soon thereafter.

We would be grateful if the Council would consider these matters with the applicant and engage with us at the appropriate time regarding any proposed amendments and financial contributions.

Yours sincerely

A large black rectangular box redacting the signature of Pauline Roberts.

Pauline Roberts
Planning Director