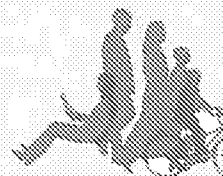




mayer brown

TRANSPORT PLANNING INFRASTRUCTURE DESIGN ENVIRONMENTAL & WATER



06 September 2017

David Innes
Arun District Council
Arun Civic Centre
1 Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our Ref VL/SPRUST(BROOKLANE).1
Your Ref A/11/17/OUT

Dear Mr Innes

**Land South of A259 New Road and East of Brook Lane, Angmering, West Sussex –
Planning Application A/11/17/OUT**

Further to my letter of 2nd August I write, on behalf of our client, Store Property Investments Ltd, to raise concerns regarding SDB Investments Limited Commercial Development Projects Ltd application for development at the above site. Specifically, my concerns relate to the Redwood Partnership's letter of 2nd August 2017.

Planning Condition in relation to the Closure of Brook Lane

The proposed access arrangements are shown on Redwood Partnership's updated drawing number REDW-3167-131 Rev B. The Redwood Partnership's letter states that it would be necessary to close Brook Lane in order to implement this access. I therefore request, on behalf of our client Store Property Investments Ltd, should consent be granted that this requirement is conditioned. In addition, in the interests of highway safety, I request that no work should be allowed to commence on the development until it is known that the existing access to the A259 can be stopped up. The following condition is suggested:

The Made Order to secure the stopping up Brook Lane's existing access to the A259 should be obtained in advance of the commencement of the development. Brook Lane's access to the A259 should be stopped-up when the new access, as shown on Drawing REDW-3167-131 Rev B, is brought into use.

Diversion of Brook Lane

In the Redwood Partnership's letter of 2nd August it is stated that they are working with West Sussex County Council to agree the principle of the Highway Authority adopting the site access, mini roundabout and public house access road in order that Brook Lane can be diverted. However, this has been written in the full knowledge that West Sussex County Council have already rejected this proposal. In their consultation response dated 19th July, West Sussex County Council advised that they would only adopt the left-in/left-out access at the A259 and that they would not adopt the internal roads. This would result in occupants of Brook Lane having to pass through third party land to obtain access to the adopted highway at the A259. This arrangement is not acceptable to our client, Store Property Investments Ltd.

My client, Store Property Investments Ltd are proposing residential development on land to the west of Brook Lane, which will assist in meeting the Council's five year housing land supply. Although a previous scheme on the site was refused, a resubmission has been made which is considered to address the reasons for refusal. The proposed diverted route of Brook Lane, through the mixed-use food store and pub development, is unsuitable as an access to the proposed residential and care home development. The proposed alignment of the diverted route

Mayer Brown Limited
Web: www.mayerbrown.co.uk



Mayer Brown Limited Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437 wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk
VAT Registered Number 483 8048 21 Registered in England Number 3531987 Registered Office Lion House Oriental Road Woking Surrey GU22 8AR



is contorted and narrows severely where it joins Brook Lane. Diverting Brook Lane, as proposed, would not provide a safe and suitable access.

Vehicular Linkage to Manor Retail Park

The revised Redwood Partnership's drawing, REDW-3167-131 Rev B, confirms that the proposed layout would permanently prevent vehicular linkage between the application site and Manor Retail Park. As set out in my letter of 2nd August 2017, this is contrary to the NPPF. Our client has already confirmed, in their email dated 13th July, that the application site has full legal rights to access through Manor Retail Park.

Accessibility

Network Rail has highlighted that the safety of the existing informal crossing is a cause for concern. However, the development doesn't propose any improvements to the crossing. Pedestrians and cyclists from the south would be required to use the existing informal crossing of the railway line to access the development.

Conclusions/Recommendations

The proposed safety compromised junction planned for A/11/17/OUT would prejudice delivery of a comprehensive "master plan" access scheme for all the land south of the A259. A "Master Plan" layout, including the residential and care home application and the previous and still current application A/23/15/OUT, as well as the existing Manor Retail Park would provide safe and logical access to all areas of land south of the A259, segregating uses, and enhancing the proposed pedestrian and cyclist facilities along the entire A259 frontage. The railway bridge, proposed as part of the residential and care home application, would offer significant safety improvements over the existing informal crossing and open up the route to those currently deterred from using the route by having to cross the railway line at grade.

Based on the above I request, on behalf of our client, that the implications of the proposed access arrangement are considered further. As currently proposed the access arrangements could not be implemented as the development relies on the stopping up and diversion of Brook Lane, which is not acceptable to our client.

I trust that these comments are helpful and will be considered in determining the planning application.

Yours sincerely



Vera Lamont
Director



cc

Ross Moyler
Sarah Wickens
Dominic Smith

Store Property Investments Ltd
Store Property Investments Ltd
West Sussex County Council