



Barnham Eastergate & Westergate (BEW)

Parcel SC1
Planning Statement
January 2022

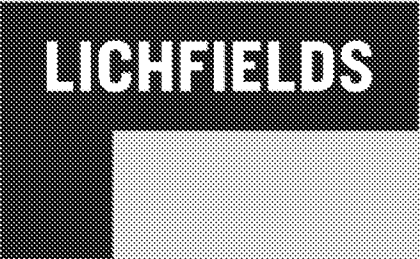
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Proposed Residential Led Development BEW Parcel SC1 Planning Statement

*Including Draft S106 Heads of Terms and Affordable
Housing Statement*

C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited
January 2022

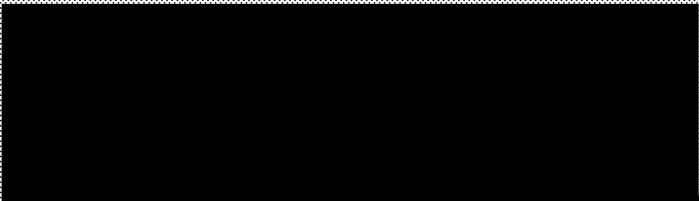
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Executive Summary

This Planning Statement has been prepared on behalf of C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited to accompany an outline planning application for development at land south of Barnham Road and north of the railway line, as well as the route of the A29 realignment south of Barnham Road, referred to as BEW Parcel SC1, which forms part of the Barnham Eastergate and Westergate (BEW) allocation in the Arun Local Plan (Policy H SP2c SD5). The proposal represents a high quality residential led development that will unlock delivery of the wider allocation, by providing necessary infrastructure to support development. It is therefore a key stage for and essential to realising the ambition and potential of the allocation.

Applications for outline planning permission seek to establish whether the scale and nature of a proposed development would be acceptable to the local planning authority, before a fully detailed proposal is put forward. This type of planning application allows fewer details about the proposal to be submitted. Once outline permission has been granted, approval of the details will be sought in reserved matters applications, to follow at a later stage.

Arun's Local Plan (adopted 2018) designates the BEW Site Allocation under Policy HS2c SD5 for a total of 3,000 homes; a Linear Park along the Lidsey Rife; a community hub including new retail, commercial and community facilities, a Tier 7 library facility and healthcare facilities; a new two-form entry primary school, a new one-form entry (expandable to two-form) primary school and nursery places; two new sports pitches and changing facilities; planned new employment provision; and transport infrastructure, including the A29 realignment route, provision of an east-west route north of the railway line, maximisation of access to Barnham railway station; regular bus services, and Westergate Link cycle scheme.

The application Site sits within the allocation boundary and forms the majority of land allocated north of the railway line and south of Barnham Road. The application also includes the proposed A29 realignment south of the railway line which will be delivered on a phased basis. The application seeks outline planning permission for the demolition of existing buildings and a proposed mixed-use development which will deliver a considerable amount of the infrastructure requirements of the site allocation.

Significantly, the development will facilitate the phased delivery of strategic road infrastructure, namely the A29 realignment south of Barnham Road to the southern tie-in with the existing A29. The first phase of the A29 realignment will be provided south of Barnham Road to provide access to the development. The second phase will comprise the bridge over the railway line to the southern tie in with the existing A29 south of the Lidsey Bends and will include the Hanbury Link (to provide an earlier connection to the existing A29). The bridge and the road south of the railway line will be delivered once the land and funding are available. The inclusion of this full section of the A29 realignment in the application ensures that there is certainty that this can be accommodated within the masterplan and can be brought forward swiftly at the appropriate time with the planning permission in place, ensuring the wider strategic benefits to the road network.

In addition, the application seeks planning permission for up to 1,250 new homes, including a 60 bed care home/senior living accommodation; a neighbourhood centre, including shops and community facilities; a primary school, nursery places and Special Education Needs (SEND) provision; a substantial part of the Lidsey Rife Linear Park as well as an extensive network of green infrastructure and public open space; road infrastructure including the 'East-West Link Road' and expansive pedestrian and cycle connections; as well as other associated infrastructure.

The application comes forward in line with the Framework Masterplan which was developed in close consultation with Arun District Council (ADC) and endorsed by the Council in November 2020. Since then, extensive ongoing engagement has taken place with ADC and relevant stakeholders, including the local community, to further progress the proposals for the application Site.

The Planning Statement contains an assessment of all planning matters relevant to the proposed development, concluding that the proposed development complies with national and local planning policy. Local planning policy strongly supports the principle of development at the Site and the application is wholly in accordance with the Site Allocation policy (Policy HSP2c SD5). Importantly, the proposed development will make a significant contribution to housing delivery in Arun which is acutely needed, with a five year housing land supply of approximately 2.4 years and Housing Delivery Test (HDT) results of 61% and 65% in 2020 and 2021 respectively (resulting in the presumption in favour of sustainable development applying to applications, as per paragraph 11 part d) of the NPPF 2021).

The planning and public benefits of the proposed development are many and substantial; namely the proposed development will:

- 1 Deliver necessary infrastructure that will unlock and support the delivery of the wider allocation, thus enabling housing delivery more widely on the allocation and the associated benefits of this. In turn, this will allow the Council's strategic ambition for growth to be realised.
- 2 Facilitate the delivery of the remainder of the A29 realignment south of Barnham Road. The Transport Assessment concludes that the development parcels to the north of the railway line can come forward prior to the full delivery of this piece of strategic road infrastructure; however its delivery is required to allow future development to come forward on land parcels south of the railway line. The Local Plan recognises that the A29 realignment will not only mitigate the effect of additional development traffic but will also provide significant additional benefits for the primary local road network and reduce potential future congestion in the wider area.
- 3 Provide 1,250 new homes and a care home/senior living accommodation, making a significant contribution towards meeting local need, including affordable housing, a range of home sizes and typologies in line with the local need at the time of reserved matters submissions. In addition, the maximum viable level of affordable housing will be secured as part of the application.
- 4 Provide a range of community facilities to support the new community on the Site and adjacent land parcels within the allocation and the existing communities of Barnham, Westergate and Eastergate. This includes the delivery of a new primary school with nursery places and SEND provision; a cricket pitch with pavilion building; and a Neighbourhood Centre with shops and facilities including a community hall.
- 5 Deliver an extensive network of publicly accessible green infrastructure focused upon the Lidsey Rife Linear Park. The application includes the majority of the Linear Park to be delivered within the allocation as a destination park with a mosaic of habitats and uses, including play space.
- 6 Promote sustainable transport choices through the provision of expansive pedestrian and cycle connections within the Site, including an attractive connection towards Barnham Railway Station, enhancements to existing Public Rights of Way such as along the route of the 'Westergate Cycle scheme' and a north-south connection to form part of the wider South Downs to Coast cycle route, which all form part of wider policy requirements and aspirations.
- 7 Deliver other transport infrastructure, such as the majority of the East-West Link Road forming the policy requirement for an east-west route north of the railway line including the section providing connectivity towards Barnham Railway Station, and the additional car parking for the station and facilities within Barnham's village centre. The remainder of the East-West Link Road will be provided within the Cala land parcel when this comes forward.
- 8 Create economic benefits including the creation of an estimated 113 full term equivalent jobs from the Neighbourhood Centre and primary school; £5.2 million additional economic output (Gross Value Added) in the local impact area and a net additional resident expenditure of c. £6.25 million in Phase 1 and c. £2.23 million in Phase 2 (application phasing is set out in Table 4.3 of this document).

- 9 Deliver a high quality residential led development that sensitively responds to the existing Site context and neighbouring villages. Through the Design Principles Document the application will deliver a masterplan that sensitively responds to the existing character in the ‘urban expansion’ areas adjacent to the neighbouring villages. In addition, the Design Principles will allow development within parcels to be physically separate from the existing villages to create a new distinct sense of place thus delivering ADC’s aspirations for this new community as outlined in the High Level Development Principles for the allocation.
- 10 Include the retention, enhancement and expansion of existing ecological features across the Site, particularly the Lidsey Rife and the Biodiversity Corridors, which will deliver net gains on biodiversity.

From a highways perspective, the application is accompanied by a Transport Assessment which provides a comprehensive assessment of the potential impact of the proposed development. The scope of the assessment has been discussed at length with West Sussex County Council (WSCC). It assesses a range of scenarios all of which include background growth, committed developments and other Local Plan developments including other land parcels within the BEW allocation that are expected to come forward prior to or in parallel to this application (all scenarios are subject to the delivery of Phase 1 of the A29 realignment north of Barnham Road to be delivered by WSCC). The scenarios include separate assessments of:

- Delivery of a section of the A29 realignment north of the railway line south of Barnham Road (i.e., without the connection over the railway to the southern tie in) – referred to as the 2031 scenarios; and
- The full delivery of the proposed A29 realignment from south of Barnham Road to the Lidsey Bends southern tie-in – referred to as the 2038 scenarios (this also includes the full allocation delivery up to 4,300 homes as in the endorsed Framework Masterplan).

The Transport Assessment models the impact on 27 junctions within the surrounding area. It concludes that all junctions will either operate within capacity or that there is a strategy in place that will mitigate the impacts of the development or improve performance. These results show that the proposed development can be delivered alongside the other allocation land parcels north of the railway line (in third party ownership) prior to the delivery of the A29 southern tie-in (i.e. prior to full delivery of the A29 realignment). The mitigation strategies include those identified by ADC in the Arun District Transport Study – Stage 3 and WSCC Enterprise Bognor Regis Transport Review (2017). Financial contributions towards the mitigation measures will be secured by legal agreement. Subject to the mitigation measures the proposed development is considered to be acceptable from a transport perspective.

The application is accompanied by a range of technical reports which demonstrate that there are no technical or environmental constraints to prevent the Site coming forward for development.

This Planning Statement demonstrates that the proposed development accords with all relevant local and national planning policy, delivers significant public benefits and represents sustainable development in social, environmental and economic terms. Having had special regard to the statutory tests under Section 66(1) and 72 of the Planning (Listed Building and Conservation Areas) Act 1990, the proposed development is considered to be acceptable in heritage terms with the less than substantial harm identified to heritage assets outweighed by the substantial public benefits of the scheme. On this basis, if NPPF paragraph 11c were to apply, the planning application should be granted without delay. However, we note that the Council does not currently possess a positive 5-year housing land supply which combined with the Housing Delivery Test figures mean that the correct position is that NPPF paragraph 11d is engaged. The proposed development does not conflict with the NPPF, nor do any adverse impacts outweigh the benefits of the development when assessed against the NPPF as a whole. Accordingly planning permission should be granted which will support housing supply in Arun and delivery of the spatial strategy set out in the adopted Local Plan.

Contents

1.0	Introduction	1
	Pre-application consultation	2
	Environmental Impact Assessment Scoping Opinion	2
	Content of the application	3
2.0	Background	5
	The application site	5
	The surrounding area	6
	Local Plan allocation	7
	Framework Masterplan	8
	High Level Development Principles	9
	Planning history	9
3.0	Consultation and engagement	11
4.0	Proposed development	13
	Description of development	14
	Parameter Plans	14
	The Proposed New Homes and Community Uses	19
	Design Principles (For Approval)	20
	Phasing and delivery	21
5.0	Planning policy context	22
	National Planning Policy Framework (2021)	22
	The Statutory Development Plan	24
	Other planning guidance	28
6.0	Planning assessment	31
	Principle of development	31
	Residential quantum and mix	35
	Design	37
	Access, parking and transport	43
	Flooding and drainage	52
	Heritage and archaeology	53

	Socio-economics	55
	Telecommunications	56
	Other environmental matters	56
	Summary	62
7.0	Draft Section 106 Heads of Terms and conditions	63
	Conditions	65
8.0	Conclusions	67

Figures

Figure 2.1 Site Location Plan	5
Figure 2.2 Illustrative land ownership plan	7

Tables

Table 1.1 Planning Application Documents	3
Table 1.2 Environmental Statement Chapters	4
Table 2.1 Relevant planning applications	9
Table 4.2 Public Open Space Provision	16
Table 4.1 Illustrative housing mix	19
Table 4.3 Indicative application phasing	21
Table 6.1 Illustrative Housing Mix	35
Table 6.2 Indicative public open space provision	40
Table 6.3 Play provision by type	42
Table 6.4 Explanation of terminology	48
Table 6.5 Junctions considered in scope of assessment and outcomes	48
Table 6.6 Junction modelling outcomes	49
Table 7.1 Planning conditions envisaged to be necessary	65

1.0 Introduction

- 1.1 This Planning Statement has been prepared by Lichfields on behalf of C.C. Projects, Ashmarden Ltd and Hanbury (PM) Ltd. It accompanies an Outline Planning Application ('the Application') for the realignment of the A29 south of Barnham Road and a residential led-mixed use development on land forming part of the Land at Barnham, Eastergate and Westergate Site Allocation (Policy H SP2c SD5) within the adopted Arun District Council Local Plan (2018). The application Site comprises the land south of Barnham Road and north of the West Coastway railway line, as well as the route of the A29 realignment south of Barnham Road including the early connection to the existing A29 (referred to as the 'Hanbury Link') (the 'Site'). As a first major phase of the wider allocated site, the proposed development is referred to as 'BEW Parcel SC1'. C.C. Projects, Ashmarden Ltd and Hanbury (PM) Ltd have been promoting the Site as 'The Southern Consortium' (the 'Applicant') and will be henceforth referred to as such. It is envisaged that other parts of the wider Site Allocation will be brought forward under separate planning applications.
- 1.2 The purpose of this Statement is to assess the proposed development against policies in the statutory development plan and other material considerations, including relevant national planning policies. This Statement has therefore been prepared to assist all relevant parties, including Arun District Council ('ADC'), in the consideration and assessment of the Application.
- 1.3 The proposed description of development is as follows:
- "Outline planning permission (with all matters reserved except for the A29 realignment) for the demolition of existing structures and mixed use development to provide residential dwellings (Use Class C3), care home/senior living accommodation (Use Classes C2/C3), flexible retail and community floorspace (Use Classes E/F2/sui generis), a primary school, plus associated open space, landscaping, drainage and all other associated ancillary works; and realignment of the A29 and early connection to existing A29, including construction of a new road carriageway, junctions and associated infrastructure."*
- 1.4 All matters are reserved (i.e. details of appearance, landscaping, access, layout and scale) for the main development proposals but full access details are provided for the A29 realignment, through the entirety of the Site from Barnham Road to its connections with the existing A29 south of the Lidsey Bends. The Application is submitted with a number of Parameter Plans which, together with the submitted Design Principles document, will comprise the main control documents, alongside any conditional or legal requirements, that will all guide future development via the reserved matters process. A Design & Access Statement and Landscape Strategy have also been prepared as supporting documents to explain the design evolution and demonstrate that the Site can be developed in accordance with the Parameter Plans and the Design Principles to achieve the ADC's policy objectives. As stated above, detailed highways drawings for the A29 realignment, including the Hanbury Link, are submitted for approval.
- 1.5 The Site forms a significant proportion (34%) of the total strategic Site Allocation in the Arun Local Plan (2018) for the land at "Barnham/Eastergate/Westergate" (Site SD5) which is identified for up to 3,000 homes, alongside other infrastructure – a new A29 route through the allocation, two new primary schools, community facilities, public open space, sports and retail provision. The application site is therefore integral to the delivery of the BEW Site Allocation in its entirety as it will provide significant infrastructure necessary to support the new homes delivered by third party landowners within the allocation (such as roads and education).
- 1.6 Following adoption of the Local Plan, in November 2020, ADC formally endorsed a Framework Masterplan for the Site, which sets the overarching principles for its development. The next

stage in the planning process is this Outline Planning Application, which seeks outline approval for the distribution of land uses (including green infrastructure), building heights, access and movement, and other matters, and approval for the new A29 road realignment. If outline permission is granted, reserved matters applications will be submitted to ADC for approval of the detailed elements (access, appearance, layout, landscaping and scale) of the development. It is proposed that the detailed road design for the A29 realignment submitted as part of the Outline Planning Application is secured by planning condition confirming detailed approval of the submitted drawings (i.e. reserved matters are not required). The delivery of the proposed A29 realignment will be phased with the first section south of Barnham Road to a central roundabout north of the railway line to be delivered alongside the proposed development. The second phase over the railway to the existing A29 to the south will be delivered once the funding and land is available.

- 1.7 The development of the Site is a key part of the allocation which is important to the Local Plan as a whole as it will contribute towards housing delivery of up to 1,250 homes to assist in meeting the District's housing need and unlock wider housing deliver across the allocation.

Pre-application consultation

- 1.8 The Application has been prepared following extensive consultation with many stakeholders including Officers at ADC and the Advisory Group. The Advisory Group was set up by ADC to provide local Councillors and key stakeholders with a forum to discuss the emerging proposals.
- 1.9 This group comprises the following members: Councillors and Officers from ADC and West Sussex County Council (WSCC), Barnham and Eastergate Parish Council, Aldingbourne Parish Council and Walberton Parish Council. The other landowners within the Site Allocation are also invited to meetings along with statutory consultees such as the NHS, Network Rail, Southern Water, Natural England, Highways England and the Environment Agency.
- 1.10 The Statement of Community Involvement, submitted with the application, sets out who has been engaged with as part of the consultation process, the feedback received and how this has influenced the Application proposals. The consultation process has been, and will continue to be, instrumental in informing the development proposals at BEW Parcel SC2.

Environmental Impact Assessment Scoping Opinion

- 1.11 Given the size of the Site and the quantum of development proposed, the development is considered to be EIA development as defined within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'). Specifically, part 10 (b) 'Urban Development Projects' threshold.
- 1.12 In accordance with Regulation 15 of the EIA Regulations, a Scoping Opinion was requested from ADC on 31st August 2020. A Scoping Opinion was received from ADC on 11th November 2020. The Scoping Opinion was based on a proposed hybrid planning application (seeking full planning permission for the A29 realignment and outline planning permission for the residential led land parcels) and so, following a decision to change the planning strategy to seek outline planning permission for all development (due to need for flexibility on the width of the road corridor along the A29 realignment for earthworks which would be established at construction stage), a letter was issued by the applicant to regularise this position with respect to the Scoping Opinion.
- 1.13 The Application is, therefore, accompanied by an Environmental Statement (ES) that reports likely significant environmental effects of the proposed development and mitigation measures where required.

Content of the application

- 1.14 The scope of this Application has been discussed and agreed with Planning Officers at ADC over a series of pre-application meetings. A suite of application reports and plans have been submitted to accompany the Application, together with an Environmental Statement (ES).
- 1.15 The Application includes a number of documents that are submitted ‘for approval’, whilst others provide background, illustrative and supporting information. These are submitted to assist ADC to reach a decision on whether to grant planning permission for the proposed development.
- 1.16 The submitted documents are set out in Table 1.1 and 1.2. Please refer to the Cover Letter submitted with the application for a full list of drawings.

Table 1.1 Planning Application Documents

Application documents	Where included	Author	Approval or Supporting
Planning application form, notices and certificates	Standalone	Lichfields	Approval
CIL Information Requirements Form	Standalone	Lichfields	Approval
Covering letter & Validation Checklist	Standalone	Lichfields	Supporting
Drawings, to include: - Site Location Plan - Demolition Plan - Parameter Plans: - Land Use - Building Heights - Landscape and Green Infrastructure - Character Areas - Access and Movement - Illustrative Masterplan		JTP	Approval Supporting Approval Supporting
Highways drawings (A29 General Arrangements and A29 Level Principles)	Standalone	Pell Frischmann	Approval
Landscape Strategy	Standalone	Fabrik	Supporting
Planning Statement, including draft S106 Heads of Terms and Affordable Housing Statement	Standalone	Lichfields	Supporting
Sustainability and Energy Strategy	Standalone	Hoare Lea	Supporting
Design and Access Statement	Standalone	JTP/Fabrik	Supporting
Design Principles Document	Standalone	JTP	Approval
Statement of Community Involvement	Standalone	Lichfields	Supporting
Minerals Resource Assessment	Standalone	Pell Frischmann	Supporting
Land Contamination Desk Study	Standalone	Pell Frischmann	Supporting
Arboricultural Survey Report	Standalone	Pell Frischmann	Supporting
A29 highways information			
Highways drawings - General arrangement plans - Level Principles	Standalone	Pell Frischmann	Approval

Application documents	Where included	Author	Approval or Supporting
- Typical cross sections			
A29 design statement	Standalone	Pell Frischmann	Supporting

Table 1.2 Environmental Statement Chapters

Environmental Statement	
A Introduction, Policy & Background	Lichfields
B Scoping & Methodology	Lichfields
C Site, Scheme & Description	Lichfields
D Transport & Accessibility	Pell Frischmann
E Landscape and Views	Fabrik
F Ecology	Ecology Solutions
G Air Quality	Air Quality Consultants Ltd
H Noise and Vibration	Noise and Vibration
I Historic Build Environment	Development Archaeology Services (ARCDAS)
J Archaeology	Development Archaeology Services (ARCDAS)
K Water Environment and Drainage	Pell Frischmann
L Socio Economics	Lichfields
M Climate Change and Resilience	Hoare Lea
N Cumulative Impact Assessment	Lichfields
O Mitigation and Monitoring	Lichfields

1.17

In this Planning Statement:

- Section 2: provides a description of the Site and surroundings and relevant planning history;
- Section 3: provides a summary of the engagement and consultation undertaken;
- Section 4: describes the proposed development;
- Section 5: summarises the relevant planning policy and other key documents for consideration;
- Section 6: provides an assessment against the statutory development plan and includes the Affordable Housing Statement;
- Section 7: sets out the proposed draft S106 Heads of Terms for the planning contributions, including CIL; and
- Section 8: provides conclusions.

2.0 Background

2.1 This Section provides a brief description of the Site and its immediate surroundings, together with a summary of the planning history. This background information assists in defining the key planning issues against which the proposed development will be considered.

The application site

2.2 The Site comprises circa 92 hectares of land and comprises a large part of land within the wider Site Allocation (270 hectares). The Site itself primarily consists of relatively flat arable land, with the exception of large greenhouses to the north and the Lidsey Rife, which runs north to south.

2.3 The Site is bordered by Barnham (to the east), Eastergate (to the north) and Westergate (to the west) and the railway line (to the south) in West Sussex, with the exception of the area for the A29 realignment which extends southwards to cross the Lidsey Rife and re-join the existing A29 in two locations. The application Site is on the Sussex coastal plain east of Chichester, north of Bognor Regis, and north-west of Littlehampton.

2.4 The Site is located approximately 6.5km north of Bognor Regis town centre and approximately 10km from Chichester City Centre.

Figure 2.1 Site Location Plan



2.5 The majority of the Site falls within Flood Zone 1, the area at the lowest risk of flooding. There are certain areas in the Site that sit within Flood Zones 2 and 3 based on the Environment Agency's Flood Map for Planning. This includes an area of Flood Zone 3 running through the north-west part of the Site which follows the Lidsey Rife watercourse.

2.6 There are three Tree Protection Orders within the Site that cover a number of trees. None of these are proposed to be removed.

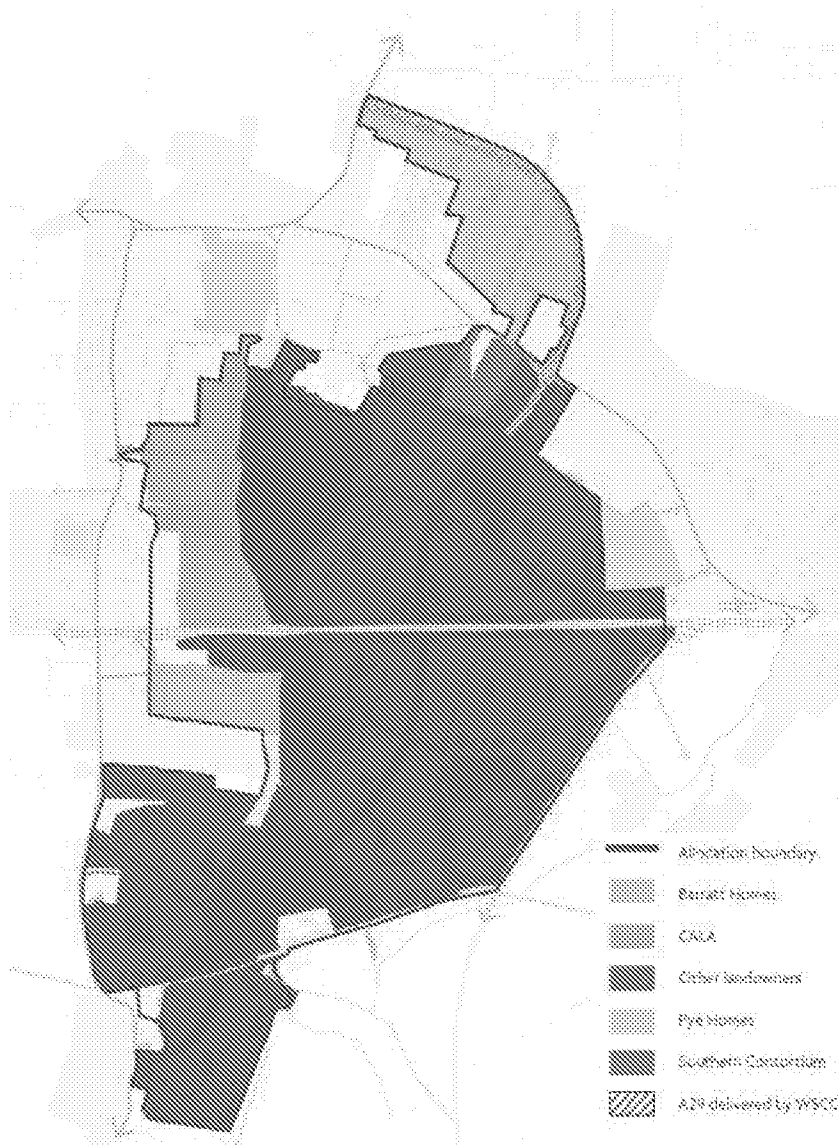
- 2.7 A small part of the Site in the north falls within the Church Lane Eastergate Conservation Area, which contains a number of listed buildings, including the Grade II* listed St George's Church and Grade II Eastergate House. St George's Church lies close to the northern boundary of the Site. Eastergate Square Conservation Area is located further to the north and also contains Grade II listed buildings.
- 2.8 The Site contains several public footpaths which form part of the local pedestrian network between Westergate, Eastergate and Barnham and enable the movement of pedestrians throughout the local area.
- 2.9 The Site spans two Parish District boundaries - Aldingbourne to the west and Barnham and Eastergate to the north east.

The surrounding area

- 2.10 Barnham, Eastergate and Westergate are located in the Sussex coastal plain east of Chichester, north of Bognor Regis, and north-west of Littlehampton. The characteristics of the coastal plain define the area, namely low-lying fields, divided by planting and watercourses. Much of the open land is devoted to agriculture and horticulture, and is subject to a high groundwater table.
- 2.11 The Site's immediate borders consist primarily of dense shrubbery or gardens to the north and east, whereas the southern and western borders have narrow planted boundaries with minimal foliage running along the Rife and railway line.
- 2.12 In its wider context, the Site is bounded by the St Philip Howard Catholic School to the east, as well as properties on Gospond Road, beyond which is Barnham Railway Station and Barnham village centre. To the north are predominantly residential properties and Barnham Road. The western border of the Site is currently formed by meadows and farmland and the southern boundary of the majority of the Site is formed by the Arundel to Chichester Coastway railway line. As stated above, the application Site also includes the proposed A29 realignment road which runs south of the railway line to re-join the existing A29. This is generally bounded by existing farmland on both sides.
- 2.13 The surrounding built form is generally characterised by residential development, with the exception of some commercial uses to the north and a mix of retail, community and commercial uses within the village centres of Barnham, Eastergate and Aldingbourne. The villages exemplify a variety of different characters, each tending to consist of strong building lines, garages set behind the dwellings and repetition of a set housing typology unique to the individual character area.
- 2.14 The villages in the area are surrounded by open land most of which is devoted to agriculture and horticulture. The South Downs National Park lies approximately 2.5km to the north, with the Chichester Harbour Area of Outstanding Natural Beauty (AONB) approximately 10km to the south west.
- 2.15 Nearby educational establishments include St. Philip Howard Catholic High School in Barnham, Aldingbourne Primary School, Barnham Primary School, Ormiston Six Villages Academy and Eastergate CE Primary School. The villages also offer premises for community events, sports and recreation with the presence of the Six Villages Sport Centre, Eastergate Village Hall and Aldingbourne Sports and Community Centre.
- 2.16 The Site is directly bound by other land which forms part of the Site Allocation, outside this Application boundary, some of which are subject to planning applications (see Table 2.1 for further information). These include:
 - 1 CALA land parcel to the west

- 2 Barratt Homes land parcel to the north
- 3 Pye Homes land parcel to the south west
- 4 The Southern Consortium land south of the railway line (including additional land in third party ownership).

Figure 2.2 Illustrative land ownership plan



Source: BEW Framework Masterplan, JTP

Local Plan allocation

2.17

The Site is a part of an area allocated in the Arun District Local Plan (2018) under Policy H SP2c SD5 for at least 2,300 homes within the plan period (2011-2031) and up to 3,000 in total (a further 700 beyond 2031). The Policy also requires any development proposals to meet the following key design and infrastructure requirements:

- 1 Housing designed around a Linear Park which follows the Lidsey Rife.

- 2 To preserve the separate identities and avoid the physical coalescence of the three villages of Barnham, Eastergate and Westergate through the delivery of green infrastructure, including avoiding physical coalescence along the B2233.
- 3 A Community Hub which will include retail, commercial and community facilities; a new Tier 7 library facility; and healthcare facilities to serve BEW (SD5) and Fontwell (SD6).
- 4 A new A29 route through the allocation to include a bridge over the railway.
- 5 An east-west route north of the railway line to join the existing A29 route and new A29 route and continue eastwards towards Barnham railway station.
- 6 Access to Barnham railway station to be maximised through attractive routes for all modes of transport including additional car parking to serve facilities in Barnham's centre including the station.
- 7 Westergate Link cycle scheme alongside further cycle routes to/from Bognor and linkages.
- 8 A new two-form entry primary school, a new one-form entry primary school and nursery places.
- 9 Two new sports pitches and changing facilities.
- 10 New employment provision.

2.18 Policy H SP2 requires a masterplan to be prepared for the Site Allocation and endorsed by the Council which should incorporate high quality design giving a sense of place and a permeable layout. This has been completed through the endorsement of the Framework Masterplan by ADC in November 2020, as explained below.

Framework Masterplan

- 2.19 The Framework Masterplan was prepared by JTP on behalf of the applicants in consultation with the other landowners and, following extensive consultation, was endorsed by ADC on 25th November 2020.
- 2.20 The Framework Masterplan is intended to guide future planning applications for development coming forward on the allocated Site, including the Application. It demonstrates how the requirements for the Site Allocation, as set out in Policy H SP2c SD5 of the Local Plan, can be comprehensively delivered.
- 2.21 As part of the Framework Masterplan, detailed design and technical work was undertaken to understand the site constraints. This included capacity testing using appropriate housing types and densities, alongside Local Plan requirements. This work demonstrated the Site Allocation can comfortably accommodate an increased number of up to 4,300 homes. In providing a comprehensive plan for development, the Framework Masterplan ensures an appropriate level of infrastructure is accounted for to serve the needs of the new community, including the increased number of homes. Officers support the increased number of homes and this was endorsed by the Council through the Framework Masterplan.
- 2.22 The Framework Masterplan sets the broad design principles to deliver an integrated community set within a high-quality landscape which integrates appropriately with the existing settlement. It sets a vision for the Allocation to create a new sustainable community arranged around attractive and well-designed neighbourhoods. The masterplanning to deliver the vision is shaped by objectives focused around delivering connectivity, placemaking and establishing a landscape intrinsically linked to the Linear Park.
- 2.23 The Framework Masterplan includes a layout for the Site Allocation that incorporates a realigned A29 relieving pressure on the surrounding road network, two local centres each

including a new primary school, new residential neighbourhoods, a Linear Park including a sports hub and other infrastructure to support the new community. It emphasises health and wellbeing and includes provision for a range of walking and cycling with a legible and permeable network of streets, paths and cycle ways.

High Level Development Principles

2.24 On 25 February 2020, the ADC Planning Policy Sub-Committee endorsed High Level Development Principles for the allocation that were prepared in collaboration with ADC officers. These were prepared to inform the preparation of the Framework Masterplan and to guide development proposals in subsequent planning applications.

2.25 The High Level Development Principles can be broadly summarised into the following key groups:

- **Access and Movement:** seek to reduce the need to travel, promote sustainable forms of transport and create walkable neighbourhoods.
- **Landscape and Green Infrastructure:** incorporate key blue and green landscape features and infrastructure, including locations for play space, sports pitches and open space.
- **Community:** identify key locations for supporting new homes, new school, neighbourhood centre, community facilities and library.
- **Built Form:** identify the development parcels and key character areas, including differentiating between urban extensions and a new community.
- **Sustainability:** include measures to enhance sustainability and mitigate climate change.
- **Technology:** incorporate opportunities for the integration of smart deliverable technologies that enhance public transport, homes, community and support uses and employment space.

Planning history

2.26 The applications for development on land adjacent or near to the Site, listed in Table 2.1, are of relevance, based on a review of the Arun District Council online planning records. The majority of these related to land within other ownership in the Site Allocation.

Table 2.1 Relevant planning applications

Site and LPA reference.	Description dev.	Decision
Land to the East of Westergate Westergate Street Westergate PO20 3Q AL/15/17/PL	Hybrid Application 1) Full Planning Application for 101 No. dwellings with new access & associated works on 3.34 ha land; 2) Outline Planning Application with all matters reserved for 249 No. dwellings with access & associated works on 15.06 ha of land. This application affects the character & appearance of the Eastergate (Church Lane) Conservation Area, the setting of Listed Buildings, Public Rights of Way & is a Departure from the Development Plan	Refused 31.03.21 This site is abutting the Site Allocation.
Boweries Barnham Road Eastergate PO20 3RT	Outline application with all matters reserved for the erection of 28 No.	Withdrawn 25.10.18

Site and LPA reference.	Description dev.	Decision
EG/42/18/OUT	dwellings, access, landscaping & associated works.	This site is within the site allocation.
Boweries Barnham Road Eastergate PO20 3RT EG/22/19/OUT	Outline application with some matters reserved for the erection of 28 No. dwellings, access, landscaping & associated works (resubmission following withdrawal of EG/42/18/OUT).	Refused 29.11.19 and appeal submitted which was also dismissed on 18.12.20. This site is within the site allocation.
Boweries Barnham Road Eastergate PO20 3RT BN/135/20/PL	Construction of 30 no. dwellings, new access, public open space, landscaping and associated works (submission following EG/22/19/OUT). This site is a Strategic Site in SP2 (Zero Rated).	Approved 13.10.21 This site is within the site allocation.
Warwick Nursery Barnham Road Eastergate Barnham PO203RT BN/153/20/PL	44 No. dwellings & associated infrastructure. This Site falls within the BEW Strategic Site, CIL Zone 1 (Zero Rated).	Approved 10.12.21 This site is within the site allocation.
Phase 1 A29 realignment (Land north of Eastergate and north-west of Barnham) WSCC/052/20	Construction of a single carriageway with shared cycleway / footway, roundabouts, road markings, traffic signals, bus stops, provision of hard and soft landscaping, construction of a substation building, installation of a noise barrier, and other associated works	Approved 30.06.21 This site is within the site allocation.
Woodgate Centre Oak Tree Lane Woodgate PO20 3GU AL/107/21/PL	Demolition of the Woodgate Centre buildings (including 3 No. residential dwellings) & the construction of 180 No. residential dwellings with the creation of new vehicular access with footways and cycleways, ancillary road infrastructure, emergency access arrangements, associated parking, public open space, including children's play space, landscape planting, surface water attenuation & drainage & other associated infrastructure	Decision pending. Target date 8.11.21 (now passed) This site is within the site allocation.
Ryefield Farmhouse, Oak Tree Lane, Woodgate, PO20 3GU AL/81/21/PL	Demolition of existing building & erection of 5 No houses comprising 1 No 4-bed detached, 2 No 4-bed link detached & 2 No 3-bed detached houses with associated access & parking (resubmission following AL/72/19/PL).	Refused 6.10.21 This site is within the site allocation.

3.0 Consultation and engagement

3.1 The applicant team has undertaken extensive engagement with ADC Officers, key stakeholders, local businesses and the community to discuss and inform the emerging proposals for redevelopment of the Site. Discussions undertaken with local groups and the public included public consultation events and a series of consultation briefings and meetings. The feedback from these pre-application discussions has informed the final scheme, which has been modified where appropriate.

3.2 The full details on the community consultation process are set out in the accompanying Statement of Community Involvement prepared by Lichfields. This Section summarises the pre-application consultation process with ADC and other key stakeholders for the Application only; additional details on the discussions on the Framework Masterplan can also be found in the accompanying Statement of Community Involvement.

Pre-application meetings

3.3 A number of pre-application meetings have taken place with ADC officers, focusing on different matters arising in relation to the Application as follows:

- 1 **23rd November 2020** – meeting to discuss a first draft of the parameter plans.
- 2 **17th February 2021** – meeting to discuss updated drafts of parameter plans and the proposed ‘Green Link’ pedestrian and cycle link.
- 3 **25th February 2021** – meeting with the Leisure and Green Space officers to discuss the play space strategy.
- 4 **22nd April 2021** – presentation and discussion on the transport modelling including the scenarios tested to show that the adjacent emerging schemes have been accommodated in the modelling.
- 5 **9th June 2021** – meeting to discuss the approach to the Section 106 legal agreement.
- 6 **29th June 2021** – meeting to discuss the approach to phasing across the allocation.

3.4 Weekly meetings were also held between ADC officers and Lichfields to discuss emerging issues and detailed aspects of the planning proposal.

Advisory Group meetings

3.5 An Advisory Group has been set up by ADC to provide local Councillors and key stakeholders with a forum to discuss the emerging proposals for the Site Allocation. This group consists of the following members: Councillors and Officers from ADC and West Sussex County Council, Barnham and Eastergate Parish Council, Aldingbourne Parish Council and Walberton Parish Council. The other landowners within the Site Allocation are also part of the group along with statutory consultees such as the WSCC, NHS Coastal West Sussex Clinical Commissioning Group, Network Rail and Southern Water.

3.6 The Southern Consortium Application was discussed at the following meetings:

- 1 **21st January 2021** – A presentation was delivered which outlined plans for forthcoming public consultation and provided an update on the approach to sustainability. A discussion also took place concerning the emerging drainage infrastructure strategy and a question and answers section followed.
- 2 **13th April 2021** – A presentation was delivered that provided more detail of the emerging Outline Planning Application and a preview of the public consultation information. Further

detail was also provided on the sustainability strategy and the latest drawing of the emerging design of the A29 realignment was presented. Discussion focused on the proposed ‘Green Link’ pedestrian and cycle link to the south of Barnham Road.

- 3 **13th July 2021** – A review of the feedback received from the public consultation was provided alongside an overview of the Application content. In response to queries from the April meeting on the Green Link, a briefing note including further detail on the design approach was provided.
- 4 **14th October 2021** – An update on the proposed phasing across the allocation was presented to the Advisory Group for review and comment. This will ultimately be appended to the Framework Masterplan.

Meetings with the Parish Councils

- 3.7 Alongside the presentations to the Advisory Group, individual meetings have been arranged with Aldingbourne and Barnham and Eastergate Parish Councils. A meeting took place with Aldingbourne Parish Council on 13 April 2021 to present the consultation material prior to the launch of the public consultation and to seek feedback. Similarly, the Chair of Barnham and Eastergate Parish Council was briefed on 8 April 2021 on the consultation information. A further meeting took place with the Chair of Barnham and Eastergate Parish Council to present the transport modelling on 23 June 2021.

Public consultation

- 3.8 In accordance with the National Planning Policy Framework (2021) and ADC’s Statement of Community Involvement (2018), the evolution of the Application proposals was informed through community consultation involving local residents and key local groups.
- 3.9 A public consultation took place over a four-week period, between 19th April and 16th May 2021. This was in addition to the public consultation undertaken by the applicant team on the Framework Masterplan in summer 2020. Due to social distancing requirements, a website was prepared which provided details on the proposals and an opportunity for people to send comments electronically, via an online form or via email.
- 3.10 The comments received as part of the consultation exercise and the Applicant’s response to these can be found in the Statement of Community Involvement submitted with the Application.

Summary

- 3.11 The proposed development is the product of a lengthy, comprehensive and responsive pre-application design development process with ADC and other statutory stakeholders, as well as the local community. The scheme has been amended and refined to address the issues raised during a comprehensive pre-application period. Full details of the consultation exercise undertaken can be found in the accompanying Statement of Community Involvement.

4.0 **Proposed development**

4.1 This section provides a summary of the proposed development. Full details are set out in the submitted Design and Access Statement prepared by JTP.

4.2 The Application is integral to the delivery of the Site Allocation and achieving the Council's vision for BEW. Principally, it will deliver essential infrastructure and placemaking objectives required by the BEW allocation policy as follows:

- 1 The remainder of the A29 road realignment (in addition to 'Phase 1' delivered by WSCC north of Barnham Road) including the crossing north of the railway line. The A29 realignment will ultimately provide a link between the A259 (Bognor Regis Relief Road) to the south and A27 to the north. This infrastructure is critical to the delivery of the wider allocation and wider strategic growth within the District by reducing congestion, improving journey times and increasing highways capacity for other housing, business and employment opportunities within the District. The application includes the entire route south of Barnham Road, as agreed with officers in pre-application discussions, to provide certainty that an acceptable design for the entire route is in place. The proposed road will be delivered on a phased basis with the first phase north of the railway to Barnham Road delivered alongside the proposed residential parcels to provide access. The second phase south of the railway line will be delivered separately once funding and land is available. Inclusion in the current application allow for a quicker delivery once the land and funding is in place.
- 2 A new community, physically separate from the existing villages, with the opportunities afforded by this to create a cohesive sense of place achieving the aspirations in the High Level Development Principles.
- 3 Modest extension to the existing built development at Eastergate and Barnham through residential parcels on the northern site boundary and adjacent to the Warwick Nursery and Boweries parcels, in an area referred to as the 'mini-masterplan';
- 4 Primary school, nursery places and Special Educational Needs and Disabilities (SEND) provision for the application Site and wider allocation.
- 5 A Neighbourhood Centre with retail, commercial and community facilities to support the allocation.
- 6 The majority of the East-West Link Road north of the railway line which will ultimately provide direct connections from Westergate towards Barnham Railway Station. The western section of this route will be delivered in the Cala land parcel.
- 7 Additional surface level car parking for Barnham Station; an essential requirement of Barnham and Eastergate Parish Council for the development and the High Level Development Principles.
- 8 Direct and attractive routes to the railway station in the form of an appealing pedestrian and cycle link via Gospond Road.
- 9 Land for a cricket pitch and small pavilion to contribute to the new sports pitch and changing facilities provision.
- 10 A significant portion of the Lidsey Rife Linear Park following the route of the Lidsey Rife. The remainder will be delivered in the Southern Consortium land parcels south of the railway line, as well as the Cala and Pye land parcels to the west.
- 11 A new cycle route through the Linear Park to form part of the 'South Downs to Coast' route.

Description of development

- 4.3 This Outline Application seeks:
- “Outline planning permission (with all matters reserved except for the A29 realignment) for the demolition of existing structures and mixed use development to provide residential dwellings (Use Class C3), care home/senior living accommodation (Use Classes C2/C3), flexible retail and community floorspace (Use Classes E/F2/sui generis), a primary school, plus associated open space, landscaping, drainage and all other associated ancillary works; and realignment of the A29 and early connection to existing A29, including construction of a new road carriageway, junctions and associated infrastructure.”*
- 4.4 The existing structures on Site, largely comprising of glasshouses for horticulture, will be demolished.
- 4.5 The highways design for the A29 realignment is submitted in detail for the full length of the road through the Site between Barnham Road in the north and the existing A29 to the south west and it is proposed that further construction and landscape design information is secured by condition. Accordingly, future reserved matters will not be required for this aspect of the proposals. Highways drawings showing the detailed design of the A29 realignment are submitted for approval and it is expected that detailed construction design will be secured by planning condition.
- 4.6 The following matters are submitted in outline and cover the main components of the scheme for which the detailed design will come forward as reserved matters:
- Residential parcels
 - Green infrastructure and public open space
 - Primary school campus
 - East-West Link Road and internal access roads
- 4.7 A series of Parameter Plans have been submitted which set out the parameters for these parts of the development.
- 4.8 The Parameter Plans and highways drawings will sit alongside the Design Principles document and together provide the rules guiding the placemaking and design of future development on the Site, which reserved matters applications must comply with. Matters of internal access arrangements, layout, scale, appearance and landscaping are reserved for future determination.
- 4.9 An Illustrative Masterplan has been produced by JTP to accompany the application. This demonstrates one way in which development could come forward through the reserved matters process, in compliance with the proposed Parameter Plans.

Parameter Plans

- Land use
 - Building heights
 - Landscape and green infrastructure
 - Character areas
 - Access and movement
- 4.10 The Parameter Plans set the development parameters within which future reserved matters applications will come forward.

- 4.11 The development aims to deliver a strong landscape-led masterplan, with health and wellbeing at the heart of the approach undertaken for the Site. The masterplan promotes connectivity with the land in the wider Site Allocation and existing communities and provides a walkable, community-focused development with a unique character, promoting healthy lifestyles across the Site.

PP01: Land use

- 4.12 The Parameter Plan – Land Use (ref.00605_PP01) identifies the main location for the various land uses in the proposed development. BEW Parcel SC1 seeks to deliver a range of uses, homes, facilities, key strategic infrastructure, and open spaces to form a sustainable new neighbourhood and provide essential improvements to the wider movement network.
- 4.13 The proposed land uses identified on the Parameter Plan include:
- 1 Up to 1,250 residential dwellings, including affordable and self-build housing (Use class C3) as well as a care home / senior living accommodation (Use class C2/C3). These areas are proposed to include secondary and tertiary streets, footways / cycleways, incidental open spaces and attenuation ponds.
 - 2 Mixed use area including a 1,250 sqm Neighbourhood Centre which will include flexible retail and community floorspace (Use Classes E/F2/sui generis), a community hall (F2) and a location of community square.
 - 3 Land for a Primary School, including nursery and SEND provision, and playing fields (F1/F2) (3.4Ha).
 - 4 An area for an additional Barnham Railway Station car park and drop off facility (approximately 200 spaces) with a pedestrian and cycle link to the station.
 - 5 Expansion areas for St Philip Howard Catholic School, as shown on the land use parameter plans.

PP03: Building heights

- 4.14 The Parameter Plan – Building Heights (ref. 00605_PP03) shows the proposed maximum building heights of the development. This plan sets out the maximum building heights for the residential, neighbourhood centre and the school and is intrinsically linked with the character areas shown on the Development Areas Character Parameter Plan.
- 4.15 The vast majority of proposed new buildings/homes would be up to 2.5 storeys and will be consistent with the scale of existing buildings bordering the Site. However, some variation in building heights will promote a range of building types and wayfinding across the Site by introducing key markers as well as differentiating the character of the different neighbourhoods within the Site. This will also help create a distinct character for the ‘new settlement’. The proposed building heights can therefore be summarised as:
- Up to 2.5 storeys at the edges of the Site close to existing development including the mini-masterplan area in the north, the north east and east side of the new settlement where it faces Barnham, and the majority of the residential parcels west of the A29 realignment.
 - Up to 3 storeys facing the Lidsey Rife Linear Park to take advantage of the views over the Park.
 - Up to 4 storeys surrounding the neighbourhood centre and in the south eastern land parcel.
 - Up to 5 storeys in the neighbourhood centre to create an intensity of homes and uses as a hub of activity at the core of the Site.

4.16 This Parameter Plan has been devised to ensure that proposed building heights across the Site remain respectful of their context and surrounding streetscape while enabling a new distinct settlement character.

4.17 Heights set out are referenced from existing ground levels and not finished flood levels and therefore account for any ground works that need to be undertaken.

PPo4: Landscape and green infrastructure

4.18 The Parameter Plan – Landscape and Green Infrastructure (ref. 00605_PP04) sets the key parameters for the open space on the Site. This includes parks and gardens, amenity greenspaces, natural and semi natural space, sport pitches, allotments, playspace and sustainable drainage systems. The total amount of public open space proposed is 31.67ha (34% of the site area). A breakdown of the types of public open space is provided in Table 4.2.

Table 4.1 Public Open Space Provision

Type	Proposed area (ha)
Parks and gardens	9.7
Amenity green space	12.02
Natural and semi-natural green space	8.81
Equipped play areas	0.66
Other outdoor provision	0.48
Total	31.67

Source: Landscape Strategy, Fabrik

4.19 In addition, the Design Principles document also defines four landscape character areas, these comprise the following. Please see the Design Principles and Landscape Strategy for further detail.

- 1 A29 Interface: Consists of the landscaped areas adjacent to the A29 realignment (including the Hanbury Link) including earthworks necessary for the delivery of the road. The area will be characterised by regular and ordered tree planting alongside the road, sensitive grassland and meadow planting in areas where clear sight-lines are required, such as junctions. Specific principles are provided for interfaces with the school, residential and open space land uses as well as gateway locations and the ramp embankment.
- 2 The Railway Interface: Comprises the green corridor alongside the railway which is proposed to form a key connection between the Lidsey Rife Linear Park in the west and green space to the east. It is proposed to provide a landscape and ecological buffer with some recreational use.
- 3 The Green Link: Presents a landscape connector to and from the Lidsey Rife Linear Park and follows a route along the existing public right of way south of Barnham Road and to the west of St Philip Howards Catholic School. In terms of character it will be similar to the linear park with generous pathways linking local play areas, seasonal ponds and small greens with an informal and active landscape. It will include a green gap or buffer between Barnham and Eastergate.
- 4 Lidsey Rife Linear Park: Comprises the valley of the Lidsey Rife and adjacent land to deliver a linear park with three broad landscape types, namely: a riparian corridor along the Lidsey Rife; a transitional zone of seasonal meadows, woodland and grassland; and a grassland zone incorporating amenity grassland with a species-rich flowering seed mix.

- 4.20 Early discussions are underway about a small parcel of land being transferred to the local community (Barnham and Eastergate Parish Council, Eastergate Primary School and St George's Church) for community use. The securing of such transfer and any such future use does not form part of this application and so the relevant land is shown as open space; however for robustness the open space calculations exclude one acre of land to future proof for this, should the potential land transfer take effect. Should this move forward in the future, it is expected that a planning application would be submitted by the local community for its intended use.

PP05 Development Areas Character Plan

- 4.21 The Parameter Plan – Development Areas Character Plan (ref. 00605_PP05) shows three distinct character areas within the proposed development. The form and scale of buildings and other structures proposed on the Site is an important consideration in shaping the character of new development. The analysis and understanding of the Site and its context, including topography, surrounding settlements, views from and towards the Site and the understanding of what will be delivered to create a thriving community were all important considerations in proposing the appropriate scale of development.
- 4.22 The proposed development is split into two key areas, namely the mini-masterplan to the south of Barnham Road, which presents an extension to the existing villages, and the new settlement. The latter will be physically separate from the villages and thus provides the opportunity to create a new distinct new character. Three character areas are proposed on the Parameter Plan and the Design Principles Document establishes the principles for development within each character area. These character areas are:
- Mini Masterplan Urban Extension: The area immediately to the south of Barnham Road consisting of residential development.
 - New Neighbourhood: The western land parcels and north eastern corner of the new settlement.
 - New Neighbourhood Core: The Neighbourhood Centre and adjacent land.

PP07: Access and movement

- 4.23 The Parameter Plan - Access and Movement (ref. 00605_PP07) identifies the principal movement and access points into and around the Site. This includes the A29 strategic road corridor (submitted in detail), the East-West Link Road corridor, secondary parcel access roads and pedestrian and cycle routes. The main vehicle access points will be from Barnham Road in the north and the existing A29 to the west. Refer to the highways drawings for the design of the A29 strategic road corridor. The elements of access and movement are described below.

A29 realignment (matters not reserved)

- 4.24 The A29 realignment forms a strategic road corridor through the centre of the Site and detailed highways drawings are submitted for approval. In short, the A29 realignment is expected to be a 30mph road and consist of:
- 1.2km of carriageway between Barnham Road (B2233) and the existing A29, including a bridge over the railway line; a bridge over the Lidsey Rife and an early connection to the existing A29 (referred to as the Hanbury Link). In the north, the carriageway will connect to Phase 1 of the A29 realignment delivered by WSCC.
 - A 5m zone for drainage /landscape immediately either side of the carriageway. Landscape and drainage drawings have been prepared to show the proposed arrangement. Compliance with the detailed design will be secured by condition.

- A 4m segregated footway and cycleway adjacent to the drainage/landscape zone.
- At grade pedestrian and cycle crossings are proposed at key junctions and intervals to allow permeability within the Site and wider allocation, including the Green Link crossing over the A29.
- Bus stops will be provided at strategic locations along the route and the precise locations will be determined in consultation with Stagecoach through the planning process.

4.25 Earthworks will be required to implement the A29 realignment (e.g. changing site levels), however the extent of the land take necessary to incorporate these will be established at the construction design stage. Accordingly, a 5m earthworks buffer zone is shown on the drawings where the potential earthworks may be necessary for the construction of the road. To allow flexibility for other land uses to come forward as appropriate within the buffer zone the application drawings are annotated as follows:

- North of the railway line - the Land Use Parameter Plan shows where residential/non-residential uses may be appropriate within the earthworks zone. The extent of the earthworks will be agreed by condition and the highways drawings explain that the residual land will form part of the adjacent development parcels.
- South of the railway line – Where the land is not required for earthworks, temporary landscaping will be provided until such time as the adjacent land parcels within the allocation come forward under separate planning applications.

East-West Link Road and secondary road corridors (submitted in outline with all matters reserved)

4.26 A well-connected network of streets will provide access through the Site to the new homes and mix of uses. The East-West Link Road presents the primary road corridor (secondary to the A29 realignment) and forms a vehicle connection leading from west to east. It has a design speed of 20mph. In the west the road will ultimately connect into the Cala Homes land parcel to the west which will include a westerly connection to Westergate Street (to be submitted by a third party as part of a separate planning application). To the east, the road will connect to the proposed Barnham train station car park and will provide a drop off facility for bus services and those dropping people off for the station. The character of the East-West Link Road will vary along its length as it passes through open space and the neighbourhood centre and will include several crossing points to enable north to south permeability.

4.27 The East-West Link Road and secondary road corridors are submitted in outline and the detailed design will come forward as part of reserved matters applications.

4.28 The Parameter Plans show indicative roads for the secondary road corridors which will provide access from the East-West Link Road to the residential parcels. In addition, the highways drawings show the illustrative design of the East-West Link Road to give an indication of its design and likely location, but this will be subject to further approval as part of any future reserved matters application.

Pedestrian and cycle connections (submitted in outline with all matters reserved)

4.29 The proposed development will present a pedestrian friendly, permeable layout to encourage walking, cycling and the use of public transport. Accordingly, it includes a number of pedestrian and cycle connections running throughout the Site to provide connectivity within the Site allocation and more widely with the surrounding area. Key aspects of the proposed pedestrian and cycle network include:

- 1 Segregated pedestrian and cycle paths being provided north to south alongside the realigned A29 and East-West Link Road.
- 2 The 'Green Link' off-road connection between Eastergate via Church Lane in the west and St Philip Howard Catholic School in the east. The Green Link will upgrade the existing Public Right of Way (PROW) to provide a segregated cycle and pedestrian path which will connect to the wider PROW network.
- 3 Pedestrian and cycle link from the drop off loop on the East-West Link Road to Gospond Road to improve connectivity to Barnham Station.
- 4 Wellness trail in the form of a circular pedestrian and cycle route around the Site that can extend south of the railway as the land parcels come forward.
- 5 Extension of the South Downs Cycle route by way of pedestrian and cycle routes within the Lidsey Rife Linear Park in the west of the Site.

The Proposed New Homes and Community Uses

New homes

4.30 The Application proposes up to 1,250 residential dwellings (Class C3) across the Site, including a 60 bed care home/senior living facility (Class C2/C3) as part of the aspiration for a multigenerational neighbourhood and to address local housing needs.

4.31 An illustrative housing mix is provided in Table 4.1. The ranges have been prepared with consideration to existing and expected market demand for the private (market sale) dwellings and ADC's Local Plan Policy AH SP2 (Affordable Housing) and the SHMA for the affordable dwellings. The housing mix for the development is proposed to be established and agreed at reserved matters stage.

Table 4.2 Illustrative housing mix

Illustrative Housing Percentage Mix	Percentage
1-2 bed	32-51%
3+ bed	49-68%

4.32 This approach will allow sufficient flexibility for future reserved matters applications to reflect the long build out period for this development. The housing mix will meet the need for housing at the time of submission of each reserved matters application, based on the most up to date market and ADC evidence on housing need.

4.33 It is expected the future residential dwellings will be a range of typologies including apartments, terraced, semi-detached and detached houses. This will result in a series of differing densities and characters. A variety of accommodation types will also help to create an inclusive and well-rounded community which reflects local need, including the provision of affordable homes. Further detail on the proposed housing typologies is included in the Design Principles Document. Opportunities for self-build housing will also be explored during the preparation of reserved matters applications.

4.34 The proposed development will seek to deliver affordable housing and further detail will be provided in a viability appraisal to be submitted prior to determination of the application.

Non-residential uses

- 4.35 Approximately 1.2 hectares of mixed-use land in the form of a Neighbourhood Centre is proposed at the centre of the Site. This will include up to 250sqm of community uses and 1,000sqm of commercial, retail and leisure uses.
- 4.36 At the core of the new community, located in close proximity to all residential areas, the neighbourhood centre will deliver a range of uses to support the everyday needs of the new community. In addition to residential, commercial and retail uses, the neighbourhood centre will include a formal area of public realm, such as a community / neighbourhood square.
- 4.37 A new primary school campus, including nursery and SEND provision will be located to the north of the neighbourhood centre with good connectivity to walking, cycling and public transport and within walking distance of all new residents. The primary school will act as a focal point within the community, being easily accessible for all new neighbourhoods, and will contribute to creating activity at the heart of the Site. The primary school site includes land to be safeguarded for a 3FE primary school, but the exact size of the school will be agreed with WSCC during determination.
- 4.38 The detailed design of the school will follow in a subsequent reserved matters application and will be designed in collaboration and agreement with the education authority (unless they undertake the works themselves) to meet local needs. Similarly, the layout and design of non-residential floorspace will be defined through subsequent reserved matters applications, with the exact nature of the uses to be determined subject to marketing, interest and local need. The Design Principles document establishes design requirements for the neighbourhood centre to guide Reserved Matters submissions.

Design Principles (For Approval)

- 4.39 The design rationale for the proposed development has drawn upon the results of the Site analysis and appraisal of the existing and historic features of the Site and its setting alongside technical assessments. This detail is set out in the Design and Access Statement and the analysis has provided the context to define the Vision for the Site and a number of Objectives which were established as part of the Framework Masterplan.
- 4.40 The final design of built development will be discussed and agreed at reserved matters stage. However, to ensure that high quality development is ensured and delivered, a Design Principles document has been prepared and submitted with the application for approval.
- 4.41 The Design Principles Document provides a benchmark for quality and coordination across BEW Parcel SC1. It sets out design principles that underpin well-designed, distinct neighbourhoods, streets and the public realm. The objective of the document is to aid the delivery of individual phases of development by providing architects and developers with certainty on design requirements that are expected to be complied with.
- 4.42 The Design Principles set out:
- Site-wide principles which apply across the development Site. This includes guidance on access matters such as the design of the roads within the street hierarchy, key crossings and pedestrian and cycle connections; key groupings which play an important role in placemaking; the interface with the A29 realignment route; and pocket parks within the residential parcels.
 - Specific built form principles for each of the three character areas and includes information such as key layout principles; identifies important interfaces with the public realm within

the character area; and built form principles such as on the building line, frontage access arrangements, housing typologies.

- Landscape character principles which identify five landscape areas as described at paragraph 4.29 and provides guidance on layout and key features for each area.

Phasing and delivery

4.43

Following demolition of the existing structures and enabling works, a phased approach to development is proposed for indicative purposes in Table 4.3 with indicative timescales shown for delivery for assessment purposes only. The road delivery comprising Phase 3 is subject to the availability of funding and land and will take place as early as possible once funding is available. It is expected that a plan setting out the extent of phases within the development will be secured by planning condition.

Table 4.3 Indicative application phasing

Phase	Proposed uses	Years
Phase 1 (north and eastern part of the application site including the mini-masterplan area)	920 homes 1,250sqm neighbourhood centre A29 realignment 'Barnham connection' (south of Barnham Road to central roundabout) Easterly connection to Barnham station of east-west link road Barnham station car parking Green link Primary school	2023-2030
Phase 2 (western part of the application site up to the Lidsey Rife valley)	330 homes Westerly connection of East-West Link Road Land for cricket pitch Lidsey Rife Linear Park	2030-2033
Phase 3 (southern route of the A29 realignment including bridge over the railway and to the southern tie-in)	Remainder of A29 south of the railway line and Hanbury Link	2031-2033

4.44

An illustrative phasing plan for the Site Allocation is expected to be considered for endorsement by Arun District Council and appended to the Framework Masterplan in due course to give an indication of phasing and delivery of key infrastructure across the Site Allocation. The current Application includes a number of fundamental pieces of key infrastructure which serve the wider Site Allocation, including the primary school, a significant proportion of the Linear Park and the full length of the A29. As noted above, the Southern Consortium is committed to facilitating the delivery of the A29 as soon as funding is available, recognising the role it plays in unlocking future development on its land on the southern part of the Site Allocation.

5.0 Planning policy context

5.1 This section provides a proportional summary of national and local planning policy and guidance relevant to the proposed development.

National Planning Policy Framework (2021)

5.2 The National Planning Policy Framework (NPPF) (July 2021) sets out the Government’s planning policies for England. It is a material planning consideration in decision making. The NPPF requires Local Planning Authorities to adopt a positive approach to decision taking and to apply a presumption in favour of sustainable development.

5.3 The aim of the NPPF is to proactively deliver sustainable development to support the Government’s housing and economic growth objectives and meet the needs of the country. Paragraph 8 sets out the three dimensions of sustainable development: ‘economic’ to help build a strong and competitive economy; ‘social’ to support strong communities and ensuring that a sufficient number and range of homes to meet the needs of present and future generations; and ‘environmental’ to protect and enhance the environment.

5.4 Paragraph 11 of the NPPF requires Local Planning Authorities to apply a presumption in favour of sustainable development, and to approve sustainable developments without delay. It states “*For decision-taking this means:*

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole....”*

5.5 Footnote 8 to paragraph 11 explains that development plan policies are considered out of date for housing applications in situations where the local planning authority cannot demonstrate a five year housing land supply (with the appropriate buffer) or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

5.6 Paragraph 15 states that plans should provide a positive vision for the future of each area and address housing needs and other economic, social and environmental priorities.

5.7 Paragraph 60 supports the objective of significantly boosting the supply of homes and for sufficient and varied land to come forward where it is needed. The size, type and tenure of housing needed for different housing groups should be assessed and reflected in policy as well as the need for affordable housing.

5.8 Paragraph 73 adds that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, provided they are well located and designed, and supported by the necessary infrastructure and facilities. In doing so, they should ensure that their size and location will support a sustainable community, with sufficient access to services and employment within the development itself.

- 5.9 The NPPF states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 81). To do this, Local Authorities should have regard for economic development and regeneration and identify strategic sites for inward investment (Paragraph 82).
- 5.10 Chapter 9 of the NPPF promotes sustainable transport. In paragraph 105, it is stated that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*
- 5.11 Paragraph 106 states that planning policies should:
- a Support an appropriate mix of uses across an area, and within large scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
 - b Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
 - c Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
 - d Provide for attractive and well-designed walking and cycling networks with supporting facilities such as cycle parking;
 - e Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation.
- 5.12 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.13 Chapter 11 of the NPPF relates to the effective use of land. Paragraph 120 sets out several principles that should be applied. One of the principles is that planning decisions should *“encourage multiple benefits from both urban and rural land, including through mixed use schemes”*.
- 5.14 Paragraph 126 supports the creation of high quality, beautiful and sustainable buildings and places, and states that *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”*. Paragraph 129 states that developers and landowners may choose to prepare design codes in support of a planning application.
- 5.15 Several key principles are identified in Paragraph 130 for achieving good design, including:
- a to function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b to be visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c to be sympathetic to local character and history, including the surrounding built environmental and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- d to establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e to optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f to create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.16 Paragraph 131 states that ‘*Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.*’ New streets should be tree lined unless there are clear, justifiable and compelling reasons why this would be inappropriate.

5.17 Paragraph 134 sets out design-related criteria that significant weight should be given to:

- a Development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
- b Outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

5.18 In paragraph 179 of the NPPF, it states that LPAs should aim to conserve and enhance biodiversity when determining applications. Paragraph 180 sets out several principles that should be applied. One of the principles is that “*opportunities to improve biodiversity in and around developments should be integrated as part of their design*”.

5.19 Chapter 16 of the NPPF refers to conserving and enhancing the historic environment. Paragraphs 199-208 set out the policy tests in relation to the impact of proposed developments on the significance of a designated heritage asset. Paragraph 200 sets out that any harm to the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal.

The Statutory Development Plan

5.20 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 should be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.21 The statutory development plan relevant to the Site comprises:

- Arun District Local Plan 2011-2031 (2018);
- West Sussex Waste Local Plan (2018);
- West Sussex Joint Minerals Local Plan (2018);
- Aldingbourne Neighbourhood Plan (2021); and
- Barham and Eastergate Neighbourhood Plan (2014 and currently under review).

Arun District Local Plan

5.22 The following Local Plan designations are relevant to the Site:

- Lidsey Treatment Catchment Area
- Strategic Housing Sites Allocation (H SP2)
- Archaeological Notification Areas (HER DM6)
- WSCC Minerals Consultation Areas
- Safeguarding the Main Road Network – indicative (TSP3K)
- Eastergate Church Lane Conservation Area

5.23 The Arun Local Plan 2011-2031 identifies a number of Strategic Allocations which are areas of land (sites) that have been identified to provide residential and commercial development to meet local housing and employment needs throughout the plan period (2011-2031).

5.24 The Arun Local Plan identifies the Barnham/Eastergate/Westergate strategic allocation under policy H SP2c (SD5) as providing up to 3,000 homes and identifies that the development proposals will need to meet key infrastructure requirements. These requirements include a new A29 route through the allocation which provides all necessary linkages and routing between the A259 (Bognor Regis Relief Road) to the south and A27 to the north. The policy states:

“This allocation is located around the small settlements of Barnham Eastergate and Westergate. This Strategic Allocation will provide at least 2,300 dwellings over the plan period, and up to 3,000 in total (a further 700 beyond 2031). Development proposals must demonstrate compliance with the following key design and infrastructure requirements:

- a *Preserve the separate identities and avoid any further physical coalescence of the three villages of Barnham, Eastergate and Westergate through the delivery of green infrastructure. Eastergate and Barnham should be protected from a continuous urban form / coalescence along the north and south aspects of the B2233,*
- b *the design of development and landscaping shall ensure that there is continuity between the existing landscape setting and villages,*
- c *the design and layout of the development shall take account of the location of the railway line crossing the site,*
- d *housing shall be designed around a Linear Park which follows along the Lidsey Rife,*
- e *A comprehensive strategy for surface water management will be developed in line with specific recommendations for this locality, in the Arun Strategic Surface Water Management Study;*
- f *significant views to and from the South Downs shall be incorporated within the site,*
- g *provide a Community Hub which has been designed and will include;*
 - i *a new well connected local centre, with connections to the train station at Barnham,*
 - ii *the location and scale of the local centre shall support and respect the relationship with existing facilities within the six villages area;*
 - iii *new retail, commercial and community facilities;*
 - iv *new Tier 7 library facility; and v. healthcare facilities to serve BEW (SD5) and Fontwell (SD6)*
- h *transport requirements including:*

- i *a new A29 route through the allocation which provides all necessary linkages and routing between the A259 (Bognor Regis Relief Road) to the south and A27 to the north and includes a bridge over the railway to the east of the current Woodgate crossing. The construction of this new route will be regarded as not only mitigating the effect of additional development traffic from the strategic site, but also providing significant additional benefits to the primary local road network and reducing the potential for future congestion in the wider area. In the event that the any landowner delays the delivery of the route and/or does not reasonably make available part or all of the route then Arun District Council will utilise Compulsory Purchase Order powers to deliver the entire route of the road from the A29 Fontwell Avenue in the north to the A29 Lidsey Road in the south;*
- ii *provision of an east-west route north of the railway line that will join the existing A29 route to the new A29 route and continue eastwards to Barnham railway station;*
- iii *ii. access to Barnham railway station shall be maximised through the provision of direct and attractive routes for all transport modes including additional car parking to serve facilities in Barnham's centre including at the railway station;*
- iv *regular bus services linking BEW with Bognor Regis (A29 route) and local facilities and employment; and iv.*
- v *Westergate Link cycle scheme, in addition to further cycle routes to/from Bognor Regis and linkages*
- i *provide a new two-form entry primary school, a new one-form (expandable to two-form) entry primary school and nursery places;*
- j *incorporate two new sports pitches and changing facilities; and*
- k *incorporate planned new employment provision.”*

5.25 The following Local Plan policies are also relevant to the proposed development:

- Policy SD SP1 Sustainable Development
- Policy SD SP1a Strategic Approach
- Policy SD SP2 Built up Area Boundary
- Policy GI SP1 Green Infrastructure and Development
- Policy SKILLS SP1 Employment and Skills
- Policy RET DM1 Retail development
- Policy H SP1 The Housing Requirement
- Policy H SP2 Strategic Site Allocations
- Policy HSP2c SD5 Inland Arun
- Policy H DM1 Housing Mix
- Policy AH SP2 Affordable Housing
- Policy H DM2 Independent living and care homes
- Policy D SP1 Design
- Policy D SM1 Aspects of Form and Quality
- Policy ECC SP1 Adapting to climate change
- Policy ECC SP2 Energy and climate change mitigations

- Policy HWB SP1 Health and Wellbeing
- Policy ORS EM1 Open space, sport and recreation
- Policy T SP1 Transport and Development
- Policy T DM1 Sustainable Travel and Public Rights of Way
- Policy HER SP1 The Historic Environment
- Policy HER DM1 Listed Buildings
- Policy LAN DM1 Protection of landscape character
- Policy EMP SP1 Strategic Economic Growth
- Policy HER DM6 Sites of Archaeological Interest
- Policy ENV SP1 Natural Environment
- Policy ENV DM4 Protection of trees
- Policy ENV DM5 Development and biodiversity
- Policy W SP1 Water
- Policy W DM1 Water supply and quality
- Policy W DM2 Flood Risk Policy W DM3 Sustainable Urban Drainage Systems
- Policy WM DM1 Waste Management
- Policy QE SP1 Quality of the Environment
- Policy DM1 Noise Pollution
- Policy QE DM3 Air Pollution
- Policy INF SP1 Infrastructure provision and implementation
- Policy TEL SP1 Strategic delivery of telecommunications infrastructure

West Sussex Joint Minerals Local Plan

- 5.26 The West Sussex Joint Minerals Local Plan was adopted in 2018 and covers the period to 2033. The application site falls within a Mineral Safeguarding Area (Sharp Sand Resource Consultation Area, as set out in the West Sussex Minerals and Waste Safeguarding Guidance 2020). Policy M9 refers to the safeguarding of Minerals Resources and requires that proposals for non-mineral development within the Minerals Safeguarding Areas will not be permitted unless the overriding need for the development outweighs the safeguarding of the minerals and it has been demonstrated that prior extraction is not practicable or environmentally feasible.

Barnham and Eastergate Neighbourhood Plan

- 5.27 The Barnham and Eastergate Neighbourhood Plan (BENP) was made in 2014. The majority of the application site falls within the Neighbourhood Plan boundary.
- 5.28 In 2021 the Parish Council undertook a review of the Neighbourhood Plan. The Regulation 15 BENP was submitted to ADC in June 2021 and was subject to public consultation between July and August 2021. The Examination Report was issued on 26 October 2021 recommending that subject to modifications that ADC can ‘make the Plan’ in its modified form (a referendum was not considered necessary). The Plan was due to be considered by Full Council on 26th January 2022 with recommendation to ‘make’ the Plan however this was withdrawn due to a judicial review. The emerging Neighbourhood Plan forms a material consideration in the determination of this application.

5.29 The following Barnham and Eastergate Neighbourhood Plan Policies (which have the same references in both the adopted and emerging plan) are relevant to the proposals:

- Policy ES3 The Local Gap/Green Infrastructure Corridor
- Policy ES4 Protection of open views
- Policy ES5 Quality of design
- Policy ES10 Trees and hedgerows
- Policy ES 15 Green Infrastructure and Ecosystem Services
- Policy GA1: Connection to sustainable transport
- Policy GA2: Public Right of Way network
- Policy CLW1: Support independent living
- Policy EE3: Support for new commercial uses
- Policy H1: Housing
- Policy H8: Settlement boundary

Aldingbourne Neighbourhood Plan

5.30 An updated Aldingbourne Neighbourhood Plan (2019-2031) was made on 14 July 2021. The majority of the Site falls outside of the Neighbourhood Plan boundary with the exception of the southern end of the A29 realignment and the Hanbury Link. The policies in the Neighbourhood Plan therefore only apply to this part of the Site. Relevant policies include:

- Policy EH1 Built Up Area Boundary
- Policy EH2 Green Infrastructure and Ecosystem Services
- Policy EH5 Surface Water Management
- Policy GA2 Footpath and Cycle Path network

Other planning guidance

Arun Parking Standards SPD 2020

5.31 The ADC Parking Standards January 2020 SPD was officially adopted at the Full Council meeting of 15th January 2020. This SPD outlines ADC's approach to parking at new developments (residential/commercial). It should be used to help determine the level of parking at new developments and includes standards on car, cycle and electric vehicle parking. The land at Barnham, Eastergate and Westergate falls within Parking Behaviour Zone 2.

Open Space, Playing Pitches & Indoor & Built Sports Facilities SPD

5.32 The Arun District Council Public Open Space, Playing Pitches and Built Facilities January 2020 SPD was adopted on 15th January 2020.

5.33 This SPD sets out a series of steps to calculate contributions towards Open Space, Playing Pitch and Indoor and Built Sport Facilities, in terms of quantity of land and or financial contributions (including maintenance) and thresholds for on-site and off-site provision.

5.34 The SPD includes the following:

- 1 Open space (parks and gardens, amenity greenspace and natural and semi-natural open space);

- 2 Playspace (equipped play areas and other outdoor provision);
- 3 Allotments;
- 4 Off-site provision (not relevant for this application);
- 5 Financial contributions;
- 6 Maintenance costs;
- 7 Playing pitches; and
- 8 Built sports facilities.

Arun Design Guide SPD (2021)

- 5.35 The Arun District Design Guide SPD was adopted on 25th January 2021 and provides further guidance on design policies contained within ADC's Local Plan. While the Guide is a material consideration in ADC's decision-making, the design solutions specified within are noted as guidance only, and alternative approaches may be acceptable.
- 5.36 The Design Guide SPD has been prepared on the basis that the distinctive historic environment, built form and landscape character of Arun provide a significant opportunity for the future of the District. It also provides direction on how good design is to be achieved throughout Arun in order that the future urban form and townscape are developed in a holistic manner that makes the best of the opportunities that the District has to offer.
- 5.37 The Guide includes sections on the following:
- Responding to the Site and Setting
 - Natural Environment
 - Movement Framework
 - Built structure and development plots
 - Welcoming streets and spaces
 - Parking strategy
 - Building design
 - Climate change and sustainability
 - Ensuring quality
- 5.38 Other relevant sections to this development include:
- Strategic housing and major development
 - Apartment buildings
 - New homes and mixed use schemes

West Sussex County Council Guidance on Parking at New Developments (September 2020)

- 5.39 The County Council, in its role as the local highway authority, is a statutory consultee on planning applications that affect the highway. The parking guidance is needed to help determine the County Council's response to consultations on planning applications and the preparation of planning policies.
- 5.40 The WSCC guidance acknowledges that each LPA will decide how to take forward parking policies and that some authorities are expected to use the County Council's new guidance, while

others will prepare their own supplementary planning documents based on the WSCC's guidance or similar evidence. In cases where LPAs have their own parking standards, these will also be referred to, but the County Council would only consider objecting to development on parking grounds where the proposed parking arrangements do not comply with WSCC guidance and this could result in a highway safety or capacity issue.

- 5.41 Given the recent status of the ADC Parking SPD, it is considered this is the most relevant document for setting parking standards in ADC, albeit, the WSCC guidance will remain a material consideration.

Framework Masterplan

- 5.42 The Framework Masterplan, which was prepared by JTP on behalf of the applicants in consultation with the other landowners, was endorsed by ADC on 25th November 2020 following extensive consultation.
- 5.43 The Framework Masterplan is intended to guide future planning applications for development coming forward on the allocated Site, including the Application. It demonstrates how the requirements for the Site Allocation, as set out in Policy H SP2c SD5 of the Local Plan, can be comprehensively delivered.
- 5.44 The Framework Masterplan sets the broad design principles to deliver an integrated community set within a high-quality landscape which integrates appropriately with the existing settlement. It sets a vision for the Allocation to create a new sustainable community arranged around attractive and well design neighbourhoods. The masterplanning to deliver the vision is shaped by objectives focused on delivering connectivity, placemaking and establishing a landscape intrinsically linked to the Linear Park.
- 5.45 The Framework Masterplan includes a layout for the Site Allocation that incorporates a realigned A29 relieving pressure on the surrounding road network, two local centres each including a new primary school, new residential neighbourhoods, a Linear Park including a sports hub and other infrastructure to support the new community. It emphasises health and wellbeing and includes provision for a range of walking and cycling with a legible and permeable network of streets, paths and cycle ways.

6.0 **Planning assessment**

- 6.1 This section sets out an assessment of the relevant planning issues associated with the proposed development. Given the nature of the proposed development being in outline, with all matters reserved except for access for the A29 realignment, many of the assessments consider the broader environmental impacts of development. The finer design details and consideration of other development management matters will be assessed at reserved matters stage.
- 6.2 The following areas are considered specifically relevant in this instance.
- Principle of Development
 - Residential Quantum and Mix
 - Affordable Housing Statement
 - Design
 - Height
 - Public Open Space, Residential Amenity and Landscaping
 - Access, Parking and Transport
 - Density
 - Flooding
 - Heritage and Archaeology
 - Socio-economics
 - Telecommunications
 - Other Environmental Issues
- 6.3 As explained in Section 5, NPPF paragraph 11(c) explains that planning applications should be approved without delay where they accord with an up to date development plan. The proposed development will make a significant contribution towards the delivery of the BEW site allocation within the adopted Arun Local Plan and will accord with the policies within the strategic development plan, thus planning permission should be granted without delay. However, where a Council cannot demonstrate a five year housing land supply or where housing delivery is below the Housing Delivery Test, NPPF paragraph 11(d) explains that the presumption in favour of sustainable development should apply. It is noted that the Council did not pass the Housing Delivery Test and cannot demonstrate a five year housing land supply and so procedurally NPPF paragraph 11(d) should be engaged. This further demonstrates why planning permission should be granted in this case.

Principle of development

- 6.4 The application Site forms part of a large allocation in the adopted Arun Local Plan (2018). The Local Plan identifies this as a strategic allocation, under Policy H SP2c SD5, which should provide for at least 2,300 dwellings over the Plan period (and 3,000 homes in total) together with key associated social infrastructure requirements. These infrastructure requirements include a new two-form entry and one-form entry primary school and nursery places; two new sports pitches facility; a community hub with a new well-connected neighbourhood centre, together with planned new retail and commercial space.
- 6.5 In terms of the delivery of strategic allocations, Policy H SP2 requires development proposals within strategic site allocations to be comprehensively planned and have regard to a masterplan endorsed by ADC. A Framework Masterplan for the entire Site Allocation was submitted to ADC

and, following extensive consultation, was endorsed by the Council on 25th November 2020. Prior to this, a number of High Level Development Principles were also submitted to the Council for consideration and were endorsed in February 2020. These informed the Framework Masterplan.

- 6.6 The proposed development is consistent with the endorsed Framework Masterplan and the High Level Development Principles. The development proposals therefore complies with the requirements of strategic Site Allocation Policy H SP2c and the sub-policy HSP2c (SD5) .
- 6.7 The strategic allocation also requires the delivery of transport infrastructure including a new A29 route through the allocated Site to provide all necessary linkages and routing between the A259 (Bognor Regis Relief Road) to the south and A27 to the north. This includes a bridge over the railway line to the east of the current Woodgate crossing. The policy also requires provision of an east-west route, north of the railway line, between the existing A29 route and Barnham railway station. New pedestrian and cycle links are a major element of the transport requirements to support sustainable travel.
- 6.8 The proposed development on the application Site will deliver a substantial part of the infrastructure and land use requirements for the Site Allocation, including extensive infrastructure provision and, significantly, it secures the design of and would facilitate the delivery of the remaining section of the A29 realignment (south of Barnham Road) in accordance with Policy HSP2c SD5. In addition, the infrastructure proposed in this application will support the delivery of adjacent land parcels within the allocation.
- 6.9 The proposed 1,250 homes on the Site will make a significant contribution to the minimum 2,300 homes to be delivered on the within the allocation, in accordance with Policy H SP2c SD5, and housing need within Arun generally. A detailed assessment of the proposed land uses is provided below.
- 6.10 With respect to the Aldingbourne Neighbourhood Plan and emerging Barnham and Eastergate (BE) Neighbourhood Plan (NP), both plans identify the Site as within the ‘Built Up Area Boundary’ to reflect its allocation within the ADC Local Plan. Aldingbourne NP Policy EH1 states that development within the Built Up Area Boundary will generally be permitted subject to complying with other policies. BE NP Policy H8 is consistent with this approach.
- 6.11 The proposed development would make an efficient and sustainable use of this accessible Site, while reflecting the character of the local area. The Site is allocated for development in the Local Plan and the Application proposals will bring forward and facilitate the Council’s aspirations for the Site. It is therefore considered that the principle of the proposed development is consistent with the Development Plan and NPPF, in that it seeks to boost significantly the supply of housing and support employment on an accessible site where development is planned and is sustainable.
- 6.12 The following sections outline the key issues on the principle of development, including:
 - Principle of proposed uses
 - Loss of agricultural land

Principle of proposed uses

Residential

- 6.13 It is recognised within the NPPF (2021) that new homes are needed in sustainable locations. Paragraphs 60-66 of the NPPF set out the policies seeking to boost housing supply and ensure delivery of a wide choice of high-quality homes.

- 6.14 Arun's strategic objective for Housing Delivery is to plan and deliver a range of housing (mix and types) in locations with good access to employment, services and facilities to meet the Districts housing requirements and the needs of Arun's residents and communities, ensuring that issues of affordability and the provision of appropriate levels of affordable housing are addressed while supporting the creation of integrated communities.
- 6.15 The Local Plan housing target for the whole plan period is to deliver at least 20,000 homes by 2031 (Policy SD SP1a). The application proposals would deliver up to 1,250 homes. The delivery of high-quality new homes on this allocated site will make an important strategic contribution towards meeting housing needs over the plan period, delivering against the various policy objectives and aspirations of adopted policy as set out below. This is the context of the 2021 Housing Delivery Test (HDT), where ADC scored 65% which results in a presumption in favour of sustainable development, and a shortfall in five-year housing land supply, which is currently only approximately 2.4 years. These development proposals will therefore make a significant contribution to Arun's five-year housing land supply figure, with 225 homes expected to be delivered within Arun's current five-year housing land supply period.
- 6.16 The need for new homes is clear at all levels of policy and the development of housing on the Site would make a significant contribution to meeting those identified needs. As such, the principle of residential use in this location is considered to be acceptable and in accordance with national policy and the development plan.

Shops, services and community facilities

- 6.17 Paragraph 106 of the NPPF requires planning policies to support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping and leisure. The strategic Site Allocation policy states that development on the Site is required to provide a Community Hub to include a new well connected neighbourhood centre, new retail, commercial and community facilities, provision for new healthcare facilities to serve the BEW Site (SD5) and Frontwell (SD6) and a new Tier 7 library facility. In relation to commercial uses, the policy requires that 'planned new employment provision' is incorporated. This is supported by Policy EMP SP1 which encourages the provision of on-site employment within the strategic housing developments and BE NP Policy EE3 which supports new development within Use Class E.
- 6.18 The Application submission proposes a Neighbourhood Centre at the core of the Site in accordance with the Framework Masterplan. The Neighbourhood Centre would provide up to 1,250 sqm of retail, leisure, commercial and community facilities centred around a neighbourhood square which will encourage community interaction and create new employment opportunities. The mixed-use community hub will be within 15 minutes' walk from the majority of all new homes. The Framework Masterplan confirms that a second neighbourhood centre will come forward in the south of the Site and that the Tier 7 library facility is envisaged to come forward in this second centre, outside of this application.
- 6.19 It is proposed that up to 1,000sqm of the Neighbourhood Centre will be for retail, leisure and commercial uses. The scale of this centre has been designed to complement, and not compete with, the existing village centre in Barnham. It will ensure local facilities can be provided in walking distance of where people live and discourage the use of car travel. As required by the NPPF and Local Plan Policy RETDM1, a retail impact assessment has been undertaken and is appended at Appendix 1. This concludes that the mix of uses will predominantly serve the new residents within the application site and wider allocation; and that the scale of uses is not expected to adversely impact on existing designated centres or local facilities.

- 6.20 The Site Allocation policy refers to the provision of new healthcare facilities on Site. Pre-application discussions have taken place with the NHS West Sussex Clinical Commissioning Group (CCG) and the CCG has confirmed that its preference is for the expansion of existing off-site facilities, namely the Croft Practice in Barnham, with financial contributions sought from the proposed development. Accordingly, health care facilities are not currently included within the application proposals. Notwithstanding, the range of uses proposed within the Neighbourhood Centre could allow a health centre if this were required.
- 6.21 Accordingly, the proposed Neighbourhood Centre will deliver a range of uses at an appropriate scale in line with the Site Allocation policy, Local Plan policies EMP SP1 and RETDM1 and BE NP Policy EE3 and the endorsed Framework Masterplan.
- 6.22 With respect to sport facilities, the Site Allocation policy requires two new sports pitches and changing facilities. During the preparation of the Framework Masterplan, the sports pitch provision was reviewed with ADC officers in light of the proposed increase in housing numbers (see paragraph 2.20 for further detail) and it was agreed that the total provision for the Site Allocation should be two sports pitches plus a 3G pitch, in a centralised location as part of a single sports hub. The Endorsed Framework Masterplan therefore shows the sports hub including the pitches south of the railway line, outside the current application boundary.
- 6.23 Nevertheless, the proposed development will include land for a new cricket pitch and pavilion building within the northern part of the Lidsey Rife Linear Park. As such, the application will deliver a proportion of sports pitch provision for the Allocation. In addition, as part of the S106 Agreement, there will be a financial contribution towards additional facilities to be provided in due course as part of the development to the south of the railway.

Social infrastructure

- 6.24 The NPPF notes that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education (paragraph 95).
- 6.25 The Local Plan Site Allocation policy requires the delivery of a new two-form entry primary school, a new one-form primary school and nursery places. As part of pre-application discussions, WSCC has advised that both primary schools should be two-form entry, expandable to three-form entry, with nursery and SEND places. The primary school site to be delivered within this application is proposed to be located adjacent to the neighbourhood centre. It comprises a site area of 3.4 hectares, within walking distance of all new homes in the application with good walking, cycling and public transport connectivity. It will provide a focal point for the new community, adjacent to the Neighbourhood Centre. The second school will be delivered south of the railway line as part of a separate planning application.
- 6.26 The school (including nursery and SEND provision) will be designed in collaboration and agreement with the WSCC Education Authority, or by WSCC itself, and will be the subject of a separate reserved matters application. The approach to the delivery of the school will be agreed during determination and the Section 106 agreement is intended to include provisions to allow for delivery by applicant (as part of the relevant reserved matters application) or WSCC.

Loss of agricultural land

- 6.27 The Site currently includes Grade 1, 2 and 3 agricultural land, although as mentioned is identified in the Aldingbourne and BE Neighbourhood Plans as within the Built Up Area Boundary. Local Plan Policy SODM1 states that unless designated by this Plan or a Neighbourhood Plan, the use of Grades 1, 2 and 3a agricultural land for any form of

development not associated with agriculture, horticulture or forestry will not be permitted. This is reiterated by the BE NP Policy ES14.

- 6.28 As the Site is allocated in the Arun Local Plan the loss of the agricultural land is considered acceptable in this case. The application land within the Aldingbourne NP area is not classified agricultural land and, therefore, Aldingbourne NP Policy EH3 is not relevant.

Residential quantum and mix

- 6.29 This section will consider the proposed housing mix and type including affordable housing.

Mix

- 6.30 The NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies and that sustainable, inclusive and mixed communities should be created (paragraph 62).
- 6.31 The ADC Local Plan housing mix policy (H DM1) requires developments to deliver a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations. The tenure mix for development schemes shall be negotiated on a case by case basis, taking into account recent evidence base documents and demand. The High Level Development Principles also seek a mixed and balanced community.
- 6.32 The application proposes to deliver up to 1,250 residential units (Class C3). The Parameter Plans and Design Principles document set out the overarching approach to the layout and quantum of development. As the Site is expected to be developed over 10 years, an illustrative housing mix based on ranges is proposed to allow for flexibility over the lifetime of the development. The ranges have been prepared with consideration to existing and expected market demand for the private (market sale) dwellings and ADC's Local Plan Policy AH SP2 (Affordable Housing) and the Strategic Housing Market Assessment for the affordable dwellings. The number of dwellings to be accommodated in each development parcel and its respective mix of accommodation will be determined during subsequent reserved matters applications.
- 6.33 An illustrative housing mix is shown in table 6.1.

Table 6.1 Illustrative Housing Mix

Illustrative Housing Percentage Mix	Percentage
1-2 bed	32-51%
3+ bed	49-68%

- 6.34 The proposed residential element will deliver a range of housing typologies including apartments, terraced, semi-detached and detached houses to ensure it meets the needs of a wider range of future occupiers, including family homes. This will assist in creating varied and diverse communities in areas of differing densities and characters. All homes will be expected to comply with the minimum internal space standards in line with Local Plan Policy D DM2. In addition, details of the number of adaptable and accessible homes will be provided at reserved matters stage and are expected to come forward taking account of relevant building regulations and policy requirements at that time.

Self build

- 6.35 The NPPF requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies including people wishing to commission or build their own homes (paragraph 62).

6.36 Policy H DM1 of the Local Plan states that the Council will particularly encourage the development of self-build homes on appropriately sized, serviced/or capable of being serviced sites, and that *“such sites can be provided either as part of a development scheme or on an individual basis”*. Policy H SP2 which relates to strategic site allocations states that a key requirement is to consider inclusion of an area of the site for Self-Build and Custom-Build. In addition, Principle SDP 6 of the High Level Development Principles states *“Opportunities should be considered for inclusion of an area of the Site for self-build and custom build homes and community led housing such as Community Land Trusts”*.

6.37 The Site will deliver self-build development plots subject to demand; the location and amount will be agreed during the determination of the application and/or during subsequent reserved matters applications.

Older persons housing

6.38 Arun Local Plan Policy H DM2 states that new and extended independent living and care homes will be permitted where applications can demonstrate they comply with the criteria listed in the policy and where proposals are consistent with all other Local Plan policies. Similarly, BE NP Policy CLW1 supports new independent living and care homes provided the design and scale of the development is in keeping with the character of the location and impact on neighbouring residents is acceptable.

6.39 Arun Local Plan Policy H DM2 states that new and extended independent living and care homes will be permitted where applications can demonstrate they comply with the criteria listed in the policy and where proposals are consistent with all other Local Plan policies.

6.40 The Land Use Parameter Plan identifies a location for a care home / senior living facility close to the eastern boundary of the Site. This accommodation could be within Use Classes C2 or C3 depending on the type of care provided. This is located within close proximity to the proposed neighbourhood centre, thereby enabling it to be accessible by foot to community and social facilities provided in these areas.

6.41 In accordance with Policy H DM2 the location is within the Built Up Area Boundary; will be easily accessible by foot to the Neighbourhood Centre and facilities within Barnham; will be close to amenity space; and will support and encourage a healthy and active lifestyle through the extensive pedestrian and cycle routes in the scheme. Moreover, the scale of the care home/senior living facility is considered to be appropriate to its context and the detailed design will come forward at reserved matters stage.

6.42 The proposed older persons housing is therefore considered acceptable and in compliance with Local Plan Policy H DM2 and BE NP Policy CLW1.

Affordable housing statement

6.43 The NPPF requires major development involving the provision of housing to provide at least 10% of the homes to be available for affordable home ownership (paragraph 65). In addition, recent further guidance published by the Government seeks 25% of all homes delivered through developer contributions to be sold as First Homes. These are homes which are discounted in perpetuity against their market value and sold to a first-time buyer. Arun has subsequently issued an interim policy statement seeking 33% intermediate housing of which 25% should be First Homes.

6.44 Policy AH SP2 requires 30% of dwellings on sites to include affordable housing unless it can be demonstrated that this is not viable. The tenure split of these affordable units should comprise 75% rented and 25% intermediate housing (i.e. shared ownership). This policy also requires

affordable housing to be visually indistinguishable from market housing and with large groupings of single tenure dwellings avoided. Affordable housing can be provided in small clusters throughout development schemes. A suggested dwelling mix is also provided in the policy. BE NP Policy H1 requires affordable housing in line with ADC Local Plan policy with a portion to be delivered through a Community Land Trust.

6.45 This section of the Planning Statement (Affordable Housing Statement) responds to the requirement in Policy AH SP2 that all planning applications that include residential development, either in whole or in part, must include an Affordable Housing Statement. The ADC validation checklist states this Statement should include the following:

- Number and mix of affordable units.
- Mix of tenure of affordable units.
- Plans showing location of units.
- Details of floor space provision for each unit type.

6.46 Due to the outline nature of this application and the fact that there is a 10 year build out programme, it is not appropriate to provide all of the details at this stage and this will follow in subsequent reserved matters applications. Overall, and over the years, the affordable housing mix for the Site will be derived from the latest evidence setting out the existing and future need of affordable housing dwellings within the District.

6.47 A Viability Assessment will be submitted as part of the planning application and will confirm the proposed level of affordable housing. The proposed level of affordable housing is expected to be the maximum viable level in compliance with Local Plan Policy AH SP2. Discussions with ADC regarding the tenure, location and timing of the affordable housing will take place during determination and will be secured by a Section 106 agreement.

Summary on new homes

6.48 The new development will provide a balanced, sustainable and vibrant community contributing towards meeting the wide and diverse range of housing needs that exist across the District. A variety of accommodation types will help create an inclusive and well-rounded community. As such, the proposed development will be in line with planning policy.

Design

6.49 Paragraph 126 of the NPPF states that “*the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*” and that “*good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities*”. Moreover, paragraph 128 explains that “*design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard for design.*” Furthermore, paragraph 130 encourages developments to be sympathetic to local character and establish a strong sense of place.

6.50 Arun Local Plan Policy D SP1 requires all development proposals to seek to make efficient use of land but reflect the characteristics of the Site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Policy D DM1 provides further design guidance, requiring developments to have regard to the development character and appearance, impact on existing properties, crime prevention, public realm, movement and legibility, density, scale and design quality. Similarly BE NP Policy ES5 requires new residential development to be of high quality design that is informed by the existing landscape character.

- 6.51 The design rationale has drawn from the site analysis and appraisal of the existing and historic features of the Site and its setting alongside technical assessments as presented in the Design and Access Statement in line with the above policies. This complies with the High-Level Development Principles document and objectives for the Site and the Framework Masterplan. The design seeks to secure the creation of a place that will complement the local area, responding to and enhancing the existing features and natural resources of the Site, whilst also a distinct place in its own right. It has also been developed to meet the key requirements listed in Policy H SP2.
- 6.52 The design intent and commitment for the Site is set out in the submitted Design Principles document and is further explained in the supporting documents comprising the Design and Access Statement, Landscape Strategy and Illustrative Masterplan. This includes how the layout has been influenced by existing site features including the Lidsey Rife watercourse, St George's Church Grade II* listed building, and the Eastergate Church Lane Conservation Area.
- 6.53 In line with High Level Development Principle SDP 8, the proposed development reflects key character areas, namely extensions to the existing villages and a new neighbourhood area, physically separate from the existing communities. This is presented on Parameter Plan ref. 00605_PP05 and the Design Principles document which present three key character areas as follows:
- Mini-Masterplan Urban Extension: A village character with larger detached and semi-detached dwellings in generous plots at a lower density, to complement the character of the neighbouring villages. Clear design principles are provided for two key features within the character area, namely the 'A29 gateway' and the 'village routes'.
 - New Neighbourhoods: Comprised of the western and north eastern residential parcels, forming the majority of the new neighbourhood area. It will be characterised by increased density with a range of house types and marker buildings and key groups to create a sense of place for the new community. Prominent interfaces for which design principles are provided include the East-West Link Road, the Green Edge (facing the Lidsey Rife Linear Park); and the Park Edge (facing the Green Link to the north and railway to the south).
 - The Neighbourhood Core: Informed by a focus on creating an intensity of uses around the Neighbourhood Centre, the Neighbourhood Core will comprise taller building heights and increased density with building types to be terraced homes and apartment blocks. Some detached and semi-detached will be permitted at the edges to transition from the New Neighbourhoods character area. Two distinct character areas include the East-West Link Road and the 'Urban Edge' facing the railway).
- 6.54 The Design Principles Document is consistent with the principles set out in the National Design Guide and National Model Design Code, and reflects local character and design preferences in line with NPPF paragraphs 128 and 130. It provides a local framework for creating beautiful and distinctive places, with a consistent and high quality standard of design. The Design Principles provides guidance on layout, building line, housing typologies, key groupings, access and parking typologies for development on the application Site to ensure complementary but distinctive character areas. This will ensure a high quality design in reserved matters applications, that will respond to the existing character of the neighbouring villages and site where appropriate and will take advantage of the opportunity to create a new community with a well-defined sense of place. The Design Principles have also included consideration of the requirements of policies D SP1 and D DM1.
- 6.55 The Design Principles document will be an approved document to guide subsequent reserved matters applications and ensure the design intent for the Site is delivered in a consistent way while allowing for an appropriate level of variation to be achieved across the identified character

and neighbourhood areas. The design intent outlined in the Design Principles complies with the development plan and NPPF policies. The need for reserved matters applications to comply with the Design Principles will ensure that the design of the development will be of high quality and comply with design policy in the NPPF and the Local Plan.

Height

- 6.56 Arun Local Plan Policy D DM1 states that the scale of development should keep within the general confines of the overall character of a locality, unless it can be demonstrated that the contrary would bring a substantial visual improvement.
- 6.57 The proposed building heights of the development are detailed in Parameter Plan ref. 00605_PPO3. This plan sets out the maximum building heights for the residential areas, and Neighbourhood Centre. The proposed heights have been designed with consideration to the existing context and as such development closest to existing properties on the north and eastern boundary will be a maximum of 2.5 storeys. This includes the plots immediately south of Barnham Road which will also complement the heights on the emerging Boweries and Warwick Nursery developments within the 'mini-masterplan' area adjacent to the Site. In response to pre-application advice, the heights to the western residential parcels overlooking the Linear Park will be up to 3 storeys to take advantage of their position overlooking the park and to create a sense of arrival for those approaching the new settlement. Similarly, proposed taller building heights in the centre and south east of the Site, including the Neighbourhood Centre, will create a distinctive new character for the 'new neighbourhood' part of the Site and are intended to complement the development that will come forward south of the railway line, in line with the illustrative densities presented in the Framework Masterplan.
- 6.58 This Parameter Plan has been devised to ensure that proposed building heights across the Site remain respectful of their context and surrounding streetscape while enabling a new distinct mixed-use neighbourhood character.
- 6.59 The Design and Access Statement includes an analysis of the local context and policy aspirations for the allocation, and, based on this analysis, demonstrates that building heights proposed are acceptable. In addition, the proposed heights and massing has also been informed by the Landscape and Visual Impact Assessment (LVIA) within the Environment Statement to minimise as far as possible any adverse effects on key views of the Site.

Density and character

- 6.60 The NPPF requires planning policies and decision to support development that makes efficient use of the land (para 124). Plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible (para 125).
- 6.61 Arun Local Plan Policy D DM1 states that the density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.
- 6.62 The Design Principles Document demonstrates how the proposed density can be varied across the Site according to the local environment, in line with the illustrative density ranges in the Framework Masterplan. By using a mix of typologies densities will respond to the setting and reflect ADC's density requirements. For example, a greater intensity of uses and homes are envisaged around the neighbourhood centre to contribute to the creating of a hub of activity, whilst lower densities are generally proposed to the edges.

6.63 The Development Areas Character Parameter Plan sets out the areas of distinct character, responding to their context and surrounding uses. The Design Principles Document sets out design guidance to underpin the character of these different areas across the Site. With respect to density, the Design Principles document provides the mechanism for controlling densities across the Site. It specifies appropriate locations for different densities of development, ensuring there will be character and variation across the Site. For example, the mini masterplan urban extension area will have a lower density envisioned in the DAS to be of up to 30 dph (indicative), the proposed new neighbourhood areas will have a medium density envisaged to be a range from 30 up to 40 dph (indicative), and the proposed new neighbourhood centre will have a higher density intended to be in a range from 30-60dph (indicative).

6.64 The proposed density of residential plots will be developed at detailed design stage having regard to the parameter plans and Design Principles Document and in conjunction with ADC as reserved matters applications come forward.

Public open space and residential amenity

6.65 The NPPF requires developments to provide the social and recreational facilities that communities need, including planning positively for the provision and use of shared spaces such as sports venues and open spaces (paragraph 93).

6.66 Arun Local Plan Policy H SP2 requires strategic allocations to incorporate high quality, well connected green spaces, planting within main streets and biodiversity rich open spaces. It also notes that sites should extend, enhance and reinforce strategic green infrastructure and publicly accessible open space. Specifically, in relation to the allocation, Policy HSP2c SD5 requires housing to be designed around a Linear Park which follows along the Lidsey Rife with significant views to and from the South Downs incorporated within the site. Similarly, Policy OSR DM1 requires housing schemes to contribute towards open space provision and standards for this are provided in the ADC Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD. BE NP Policy ES5 requires development to integrate with the local landscape as well as conserve features which contribute to the distinctive character and pattern of the landscape.

6.67 The Application proposals include provision of approximately 35ha (38% of application site total) of green space and 30.5ha of Public Open Space (33% of application site total). This significantly exceeds the policy requirement for 9.99ha of public open space within the site based on the SPD. The amount of public open space proposed was assessed against the minimum policy requirement, broken down by types. As the table below shows, the Site meets the requirement generally and significantly exceeds the minimum area requirement for 'parks & gardens', amenity green space', and 'natural and semi natural' areas. Area calculations for public open space exclude all SuDS features and the 1ha land swap area.

Table 6.2 Indicative public open space provision

Public Open Space Type	Policy Requirement (Ha/1,000)	Total policy requirement (ha)	Indicative provision in application (ha)
Parks & gardens	0.80	2.13	9.7
Amenity green space	0.60	1.60	12.02
Natural, semi-natural	1.80	4.80	8.81
Equipped play areas	0.25	0.66	0.66
Other outdoor prov.	0.30	0.80	0.48
Total	N/A	9.99	31.32

Source: Landscape Strategy, Fabrik

- 6.68 The Green Infrastructure Parameter Plan (ref. 00605_PPO4) sets the key parameters for the open space on the Site. This includes the locations of parks and gardens, amenity greenspaces, natural and semi natural space, cricket pitch, playspace and sustainable drainage systems. The majority of public open space will be provided in the form of the Lidsey Rife Linear Park which will be a multifunctional space designed to integrate the existing landscape features such as the watercourses, trees and hedgerows. The remainder of public open space will be provided in the form of green corridors around the edges of residential parcels and pocket parks within parcels.
- 6.69 The Design Principles document defines five landscape character areas, these comprise the following:
- 1 Lidsey Rife Linear Park: A destination park for the existing and new community with a mosaic of habitats and uses with amenity grassland in the north and wildflower/grassland meadows to the south. It will be a focus of recreational activity including play space, walking and cycling.
 - 2 A29 Interface: Varied character along the length of the A29 realignment including regular and orderly tree planting, buffer planting and active recreation space close to the bridge over the railway.
 - 3 The Railway Interface: An ecological and landscape buffer along the boundary with the railway line including focal landscape spaces and a footway/cycleway.
 - 4 The Green Link: Serves as a gap or buffer between the existing and proposed development to retain the character of 'three villages', similar in character to the Lidsey Rife Linear Park.
- 6.70 Further detail on the landscape character areas is provided in the accompanying Design Principles (for approval) and Landscape Strategy (supporting/illustrative). An illustrative landscape masterplan is provided in the Landscape Strategy to present how the green infrastructure could be delivered. Overall, the green space provision including the Lidsey Rife Linear Park has been designed to fit into the wider network of open space within the Allocation and as envisioned in the Framework Masterplan.
- 6.71 It is anticipated that new dwellings would be provided with amenity space in the form of private rear gardens and balconies, and communal amenity space as appropriate as required by policy and the Arun Design Guide. This level of detail will be provided as part of reserved matters submissions. Allotment provision identified in the Site Allocation policy is accounted for in the Endorsed Framework Masterplan and is to be provided to south of the railway line. This will, therefore, come forward within applications for other land parcels within the allocation.
- 6.72 Overall, the proposed development will deliver the majority of the Lidsey Rife Linear Park north of the railway line as part of a multifunctional network of green and public open spaces across the Site. The provision of public open space will far exceed the requirements of Policy OSR DM1 and the SPD. Furthermore, the design of the green infrastructure and open space aligns with the requirements of Local Plan Policies HSp2 and HSP2c SD5 and respects the existing landscape features within the Site in compliance with BE NP Policy ES5.

Playspace

- 6.73 Arun Open Space, Playing Pitches, Indoor and Built Sport Facilities SPD (2020) includes details on the play space requirements for developments.
- 6.74 The proposed approach to playspace provision has been discussed with ADC officers as part of the pre-application engagement including the amount and indicative locations of play. Overall, the proposed development will deliver a minimum of 1.21ha of playspace as set out in Table 6.3. details would be agreed on a phase by phase basis as part of reserved matters submissions. The

table demonstrates that the scheme would exceed the policy requirement for equipped areas of play and where possible all play will be required to be constructed of natural materials to respond to feedback from ADC officers.

Table 6.3 Play provision by type

Play provision type	Policy requirement (ha/1000)	Total policy requirement (ha)	Proposed provision (ha)
Equipped designated play areas	0.25	0.66	0.73
NEAPs (Neighbourhood Equipped Area of Play)			0.2
LEAPS (Locally Equipped Area for Play)			0.28
LAPS (Local Area for Play)			0.18
Nature Hubs			0.07
Other outdoor provision (MUGAs and skateboard parks)	0.3	0.8	0.48

Source: Landscape Strategy, Fabrik

- 6.75 Indicative locations for play space are shown on Parameter Plan - Green Infrastructure (ref. 00605_PPO4) and Design Principles Document. Details of the play areas will come forward as part of the reserved matters submissions for each parcel within the application Site. The Landscape Strategy sets out further details on the illustrative play strategy including the rationale for the distribution of play space across the site, which could include destination play areas, community play areas and activity trails. Destination play areas are fully equipped and include informal recreation and areas dedicated to hard play. Community play areas include both equipped and unequipped informal recreation, and activity trails are inclusive where the focus is on play, education, inclusive fitness and access to nature.
- 6.76 BE NP recognises that there is a lack of good quality play areas within the villages (para. 3.16). The Landscape Strategy explains in Section 5.4.1 that both new and existing residents could have access to the proposed play spaces via the extensive network of pedestrian and cycle routes within the scheme.

Sports facilities

- 6.77 Arun Local Plan policy ORS DM1 requires development proposals for housing development to contribute towards playing pitch provision and indoor sport and leisure facilities. ADC's Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD provides a step-by-step approach on how the provision for open space, playing pitches, indoor and built sports facilities should be calculated. For strategic developments, on-site provision is expected. Specifically, for the BEW allocation, Local Plan Policy HSP2c SD5 requires the provision of two pitches and changing facilities.
- 6.78 Sports facilities are embedded into the scheme in the form of land for a cricket pitch and small pavilion building. This forms part of the agreed sports provision for the Allocation as presented in the Endorsed Framework Masterplan, which includes a sports hub south of the railway line, including pitches for multi sport use and a building that could provide indoor sports provision.
- 6.79 The proposed development therefore accords with the policy requirements in Policies HSP2c SD5 and OSR DM1.

Access, parking and transport

- 6.80 The NPPF requires transport issues to be considered from the earliest stage of development proposals so that the potential impacts of the development on transport networks can be addressed (a), opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised (b), opportunities to promote walking, cycling and public transport are identified and pursued (c) and the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account (d) (paragraph 104).
- 6.81 When determining planning applications, development should only be refused on highways grounds where it would have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (NPPF paragraph 110). In demonstrating an acceptable impact, planning applications should be supported by a Transport Assessment that can outline any likely impacts of the proposal (paragraph 113).
- 6.82 As the Highway Authority for the district, WSCC has prepared a number of guidance documents setting out how new developments should approach transport in the District and wider area. Of note is the WSCC Local Transport Plan (2011-2026) which refers to improvements to junctions along the Strategic Road Network (SRN), the mitigation apportionment study and overall active and sustainable travel guidance. Other relevant documents include the WSCC Walking and Cycling Strategy and Guidance on Parking at New Developments.
- 6.83 The ADC Local Plan provides more detailed policies and guidance, some specifically relevant to this Site. Policy H SP2 requires that developments integrate appropriately with surrounding communities through connectivity of transport modes including walking, cycling and public transport and ensure walkable access to local community, recreational and shopping facilities, jobs and accessible transport. Specifically in relation to the BEW allocation, Policy HSP2c SD5 requires:
- A new A29 route through the allocation which provides all necessary linkages and routing between the A259 (Bognor Regis Relief Road) to the south and A27 to the north and includes a bridge over the railway to the east of the current Woodgate crossing.
 - Provision of an east-west route north of the railway line that will join the existing A29 route to the new A29 route and continue eastwards to Barnham railway station.
 - Access to Barnham railway station to be maximised through the provision of direct and attractive routes for all transport modes including additional car parking to serve facilities in Barnham's centre including at the railway station.
 - Regular bus services linking BEW with Bognor Regis (A29 route) and local facilities and employment; and
 - Westergate Link cycle scheme, in addition to further cycle routes to/from Bognor Regis and linkages
- 6.84 The requirement for the route of A29 realignment is reiterated in Policy TSP3 which requires the route as shown on the proposals map through the BEW Site Allocation to be safeguarded. Moreover, BE NP Policy GA5 supports the provision of commuter parking for the station on the eastern edge of the allocation, as identified on the NP proposals map.
- 6.85 Policy T SP1 requires development to be designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services, while making provision for safe access to the public highway network. Development will also be expected to promote vehicles which use low carbon technology and link into the District's green infrastructure network, giving priority to pedestrian and cycle movements. Policy T DM1 requires new development to be located within easy access of established public transport service(s) and

existing pedestrian and cycle networks. Moreover, BE NP Policy GA1 requires new developments to provide access to public transport and BE NP Policy GA2 supports proposals that improve and extend the existing footpath and cycle path network. Aldingbourne NP Policy GA2 reiterates this requirement.

- 6.86 A Transport Assessment and Framework Travel Plan (ES Appendix D1 and D2) have been prepared by Pell Frischmann and submitted with the Application and should be referred to for full details of the transport proposals which form part of the proposed development.
- 6.87 The Transport Assessment considers the accessibility of the Site within the surrounding transport infrastructure, examines the predicted generation of trips and assesses the overall sustainability strategy adopted for the scheme.

Transport infrastructure provision

- 6.88 The application will deliver extensive and expansive road infrastructure to mitigate the allocation as a whole and benefit the strategic highways network.
- 6.89 The proposed new strategic infrastructure, comprising the provision of the A29 realignment south of Barnham Road, will facilitate the delivery of the whole allocation. The proposals represent the majority of the route, with the first phase of the A29 north of Barnham Road connecting to Fontwell Avenue to be delivered separately by WSCC. The proposed realignment through the Site will cater for motorists wishing to travel from the Bognor Regis in the south to the A27 in the north and avoid the Westergate Level Crossing. It would therefore address existing traffic congestion and increase highways capacity to serve the needs of the allocation and the wider strategic highways network.
- 6.90 The proposed A29 realignment will provide the principal vehicular access into and through the Site, as shown on the Movement & Access Parameter Plan (ref. 00605B_PP07) via the Barnham Road access point. A 4m segregated pedestrian and cycle route would also be provided either side of the road, thus providing pedestrian and cycle access into the Site.
- 6.91 The Southern Consortium is fully committed to facilitating the delivery of the proposed A29 realignment. It has, therefore, submitted detailed highways drawings with supplementary construction and landscaping detail to be secured by condition (reserved matters will not be required for the A29 realignment). At present it is assumed the A29 realignment will be funded by s106 contributions from across the allocation with delivery from the north of the Site, on a phased basis, alongside development, until the Railway line is reached.
- 6.92 The proposed bridge crossing and remaining element for the A29 would need to come forward ahead of any future development to the south of the railway. This Application proposal facilitates an earlier delivery of this part of the road by seeking detailed planning permission for its design and layout.
- 6.93 The Southern Consortium is committed to facilitating the delivery of the road south of the railway line, in order to unlock the developable land within this part of the allocation. The Consortium is continuing to explore third party funding opportunities, which could bring delivery of the road south of the railway line forward at an earlier stage in delivery of the allocation, subject to land availability. As explained in detail below, at para 6.98 onwards, the Transport Assessment has considered the proposed phasing of the A29 construction and the combined impacts of the Application and surrounding proposed developments on the highways network. This concludes that the predicted traffic impacts from the application proposals are not severe during the interim period prior to the full length of the road coming to fruition.

- 6.94 As shown on the Movement & Access Parameter Plan, the proposed development will deliver the majority of transport infrastructure required of the allocation. This includes the internal access arrangements across the Site and the following key infrastructure which are submitted in outline with all matters reserved:
- **Majority of the East-West Link Road:** This will form a primary road corridor, connecting the Site to Westergate Road/ existing A29 to the west and through a series of parcel access routes, distribute movement directly to new neighbourhoods within BEW. The East-West link will vary in design along its length as it passes through open space and the neighbourhood centre and will include several crossing points to enable north to south permeability. The remainder western connection to the existing A29 will be delivered when the Cala land parcel comes forward.
 - **Direct and attractive pedestrian and cycle routes to Barnham Railway Station:** This is proposed to be provided in the form of a 5m pedestrian and cycleway with associated landscaping along the southern boundary with St Philip Howard Catholic School. This will connect onto the existing movement network at Gospond Road to provide access to the station. A potential alternative route is shown on the Parameter Plan that could connect to the western end of Gospond Road should the preferred route not move forward. See page 91 of the DAS for detail.
 - **Additional car parking to serve the station:** An area of surface car parking to provide up to 200 car parking spaces is proposed at the eastern edge of the Site with pedestrian and cycle access to the station via Gospond Road.
 - **Extensive pedestrian and cycle network connections throughout the Site.** The routes comprise a combination of on and off street infrastructure along the road network and within the Lidsey Rife Linear Park which will connect into the wider movement network envisioned in the Framework Masterplan.
- 6.95 The Parameter Plan shows indicative locations for the East-West Link Road, secondary and tertiary roads as well as Public Rights of Way, pedestrian and cycle routes within the Site. The Parameter Plan, detailed highways drawings, Design Principles Document and illustrative masterplan demonstrate how the development can provide a legible and permeable movement network to serve the new community whilst promoting sustainable means of transport.
- 6.96 The number of proposed crossings and junctions of the A29 realignment as illustrated has been tested in the Transport Assessment. These connections will be required to ensure that the proposed A29 realignment integrates into the allocation. However due to the outline nature of the parcels within the application Site and that the application does not include development of parcels south of the railway line, there is need for flexibility in the location of these junctions and crossings. Accordingly, the locations drawn are illustrative with the exact positioning of crossings and T-junctions onto the A29 to be agreed pursuant to a condition as the detailed design of the relevant land parcels moves forward alongside the submission of reserved matters for that parcel or separate planning applications for land parcels south of the railway.
- 6.97 The transport infrastructure provision therefore accords with Local Plan Policies HSP2, HSP2c SD5, TSP1, TSP3 and TDM1; BE NP Policies GA1 and GA2; and Aldingbourne NP Policy GA2. Additionally, it will provide the commuter parking supported by the BE NP. It is clear that the proposed development will deliver the required local and site-specific policy requirements in respect of transport.

Sustainable transport network

- 6.98 As mentioned above, a considerable network of pedestrian and cycle links are proposed as part of the development to encourage and promote an uplift in trips by active modes. Key connections shown on the Parameter Plan include:
- The Green Link which will provide an important road pedestrian and cycle link between Westergate and Barnham and will include the upgrading of the existing Public Right of Way. It is expected to be a main route for school children travelling between the villages and will allow connection to the link north provided within the Boweries site. An at grade crossing of the A29 will be provided which will prioritise the safety of the pedestrians and cyclists with a design treatment to signify their arrival at the crossing, such as the use of sensitively designed barriers. The crossing has been designed to be appropriate to the A29 speed limit; Design Manual for Roads and Bridges technical guidance; and design matters such as the need for surveillance, minimising visual impact, and landscape design.
 - Realignment of the existing Public Right of Way (PRoW) on the eastern boundary with St Philip Howard Catholic School to tie in with the proposed movement network and which ultimately will connect south to the wider allocation.
 - Footpaths and cycle routes throughout the Lidsey Rife Linear Park, including a north-south connection to form part of the wider South Downs to Coast cycle route, and residential parcels to provide easy and attractive connections between homes, green space and the Neighbourhood Centre.
 - Connections to Barnham Railway as mentioned above. The preferred route is to the south of St Philip Howard Catholic School and north of the properties on Gospond Road. A potential alternative route is shown on the Parameter Plan that could connect to the western end of Gospond Road should the preferred route not move forward.
 - A wellness trail will provide a slower, more circuitous route around the Site to encourage exercise and leisure journeys.
- 6.99 To promote sustainable modes of transport a Travel Plan will be secured by condition. In addition, discussions have been ongoing with Stagecoach regarding regular bus provision along the A29 realignment through the Site and beyond. In particular, Stagecoach is keen to explore interventions to improve bus reliability to and from Chichester. This engagement will continue during determination of the planning application with an aspiration for bus services to be redirected through the Site in due course.
- 6.100 In terms of school transport, it is proposed that secondary school children would initially access the new proposed secondary school in Ford, through a phased introduction of a school bus service, to accommodate demand in line with buildout of the proposed development. In the longer term, the feasibility of providing a pedestrian and cycle route towards the school along the remnants of the Portsmouth to Arundel Canal on the southern boundary of the allocation will be explored as part of the future planning application for the allocated land south of the railway.
- 6.101 The inclusion of routes for equestrian use has been discussed as part of preparing the Framework Masterplan and this planning application. The Framework Masterplan states that consideration will be given to exploring opportunities for the provision of a bridleway within the Site Allocation. Given that there are no existing bridleways within the locality of the Site and that the underpasses beneath the railway are expected to be upgraded as part of the applications for land south of the railway, it is intended that bridleway provision will be explored for applications south of the railway. This may include the future upgrading of routes north of the railway to connect into this network but does not form part of the current application.

- 6.102 Overall, it is clear that the proposed BEW Parcel SC1 development will be able to implement a sustainable transport network that promotes transport choice, ensuring good integration between the modes of travel and promoting healthy lifestyles in accordance with policy.

Car and cycle parking

- 6.103 In terms of sustainable modes of transport, paragraph 104 of the NPPF requires development proposals to pursue opportunities to promote walking, cycling and public transport uses.
- 6.104 Guidance on car and cycle parking requirements are set out in the following documents: West Sussex County Council: Guidance on Parking at New Developments (September 2020) Arun District Council – Parking Standards Supplementary Planning Document (January 2020).
- 6.105 Details of parking layouts, disabled parking provision, cycle parking provision and electric charging points will be devised, in line with the above supplementary guidance notes, as part of future reserved matters applications.

Highways impact

- 6.106 As required by the NPPF (para 113) and planning policy (Policy H SP2) a Transport Assessment has been prepared and is appended to the Environmental Statement. The comprehensive assessment has been undertaken by the appointed highways consultant Pell Frischmann in consultation and agreement with the highway authority WSCC (and their appointed consultant WSP). This concludes that the proposed development will not lead to a detrimental impact on the surrounding highways network and is acceptable in highways terms subject to the recommended mitigation. The assessment is summarised below.
- Section 3 considers the existing (baseline) transport conditions.
 - Section 4 describes the transport aspects of the proposal.
 - Section 5 explains the trip generation (i.e. how many traffic movements will be created by the development) and modal share (i.e. why type of transport will be used for the movements – e.g. car, bike, walking etc).
 - Section 6 presents the findings of the strategic highways modelling and impacts on junction capacity.
 - Section 7 provides a summary of the report and conclusions.
- 6.107 The Southern Consortium is mindful that the transport impact of the development is a primary concern for local residents. Accordingly, the assessment includes a detailed review of the existing (baseline) transport conditions (Section 3 of the report) and comprehensively models the impact of the development in the context of the wider allocation and other nearby proposed schemes. It is worth emphasising the baseline assessment demonstrates that the strategic network would experience issues in any case were the development not to come forward.
- 6.108 As such, the strategic modelling undertaken for the Site considered all land within the Site Allocation and a number of alternative scenarios for the development coming forward, alongside other allocated developments in the Local Plan and associated infrastructure improvements. The scenarios considered are below. All scenarios include background growth, committed developments, wider infrastructure and other local plan developments as set out in Table 6.4. Importantly this includes Phase 1 of the A29 realignment to be delivered by WSCC.

Table 6.4 Explanation of terminology

Term	Description
Background growth	Predicted traffic growth as a result of increase in driving over time
Committed developments	Other developments that have been approved
Other Local Plan Developments	Sites within the adopted Local Plan, including the other land parcels within the BEW allocation, namely Barratts, Warwick Nursery, Boweries, Cala and Pye Homes.

Source: Transport Assessment, Pell Frischmann

6.109

The following scenarios have been tested:

- 2031 do minimum – this models the background growth, committed developments, infrastructure changes and other local plan developments without the proposed development included.
- 2031 do something – the above plus the proposed development including infrastructure that is expected to be delivered by 2031 (i.e. the first part of the A29 realignment north of the railway line, excluding the road south of the railway line).
- 2031 do minimum without the Cala development – this models scenario 1 excluding the Cala land parcel and associated section of the East-West Link Road (i.e. connection to the existing A29).
- 2031 do something without the Cala development – this models scenario 2 excluding the Cala land parcel and associated section of East-West Link Road.
- 2038 do minimum – this models background growth, committed developments, infrastructure changes and other local plan development without the proposed development included.
- 2038 do something – scenario 5 plus the proposed development including the full extent of the proposed A29 realignment. For robustness this includes an additional 2,000 homes south of the railway line (additional to the 1,250 homes presented in the application) and three form entry primary school.

6.110

The junctions tested were agreed with WSCC and Highways England based on those in the ADC Infrastructure Delivery Plan (IDP), plus additional junctions considered necessary by WSCC. The junctions tested are set out in Table 6.5.

Table 6.5 Junctions considered in scope of assessment and outcomes

Category	Junction Name
Realigned A29 and Site Allocation access junctions	Fontwell Avenue / A29 realignment
	Barnham Road / A29 realignment
	Realigned A29 / East-west link road roundabout
	Westergate Street / Northern Access
	Realigned A29 / Link to Woodgate Roundabout A (<i>modelled in 2038 only</i>)
	Lidsey Road / Southern Access
	Lidsey Road / Site Access (parcels R33 and R34) (<i>modelled in 2038 only</i>)
	Realigned A29/ Lidsey Road (Hanbury Link) (<i>modelled in 2038 only</i>)
	Lidsey Road / Site Access (Parcel R35) (<i>modelled in 2038 only</i>)
	Realigned A29 / Links to southernmost roundabout (<i>modelled in 2038 only</i>)
	Lidsey Road / A29 Realignment (<i>modelled in 2038 only</i>)

Category	Junction Name
Existing A29 junctions	A27 / Fontwell Avenue
	Fontwell Avenue / Eastergate Lane
	Fontwell Avenue / Barnham Road
	Nyton Road / Westergate Street
	Westergate Street / Hook Lane
	Shripney Road / Charles Purley Way
	Shripney Road / Rowan Way
Apportionment Study junctions	Nyton Road / A27
	A27 / A29 (Fontwell Eastern Roundabout)
	B2233 Yapton Road / A259 Crookthorn Lane / Gravatt's Lane (Oystercatcher junction)
Other junctions modelled	B2145 / A27 Whyke Roundabout
	A27 / A259 / Vinnetrov Road (Bognor Road Roundabout)
	Nyton Road / Oving Road
	Barnham Road / Lake Lane
	A27 / A284 Ford Road / Arundel Bypass
	A27 / The Causeway Roundabout, Arundel

Source: Transport Assessment, Pell Frischmann

- 6.111 A map showing the locations of these junctions is provided at Appendix 2. The majority of junctions will either operate within capacity or there is a strategy that will mitigate the impact of the development. The junctions which are forecast to operate over capacity in some scenarios are noted in the Transport Assessment, along with a commentary on how the impact can be mitigated. This is summarised in Table 6.6.

Table 6.6 Junction modelling outcomes

Junction	2031 scenarios	2038 scenarios
A27/Fontwell Avenue	The junction is projected to operate over capacity in the 2031 scenarios including those without the proposed development. A mitigation scheme is provided in the Arun District Transport Study – Stage 3 to address this. This includes signalling the roundabout on the A27 North and Arundel Road West. This will improve the performance of the roundabout and reduce the overall queue length.	The junction is forecast to operate over capacity. A mitigation scheme for this junction has been identified which will improve the performance of the roundabout and reduce reported queue lengths.
Westergate Street/Hook Lane	The junction is forecast to operate within capacity in all 2031 scenarios.	The junction is forecast to operate within capacity with the exception of one 15 minute period where capacity is only exceeded by three users. It is considered that road users will adapt their behaviour to avoid this period and so no mitigation is considered necessary.
Shripney Road/Charles Purley Way	The junction is forecast to operate within capacity in all 2031 scenarios. Notwithstanding, a mitigation scheme is presented in the Arun Transport Study Stage 3 Report and the Enterprise Bognor	With the existing geometry the junction is forecast to operate over capacity and so mitigation is required. With the mitigation in place, there is significant improvement to the performance of the junction in all

Junction	2031 scenarios	2038 scenarios
	Regis Transport Review (2017) and this has been modelled alongside the traffic from the Saltbox development site. The modelling shows that with this mitigation the junction is forecast to operate within capacity in all scenarios except the David Purley Memorial arm of the junction, and there is significant improvement in the performance of the A259 Felpham Relief Road and A29 Shripney Road South. The additional traffic on the David Purley Memorial arm is attributed to the Oldlands Farm site and not the proposed development.	scenarios. The junction is only forecast to be over capacity in the afternoon peak on the David Purley Memorial and A29 Shripney Road North arms of the junction. As mentioned this is considered to arise from the Oldlands Farm site. It is also noted that the proposed development is 1,250 homes and so the impact would be felt when the additional homes south of the railway are delivered. These will be subject to a separate application and additional mitigation could be secured at that stage if required (informed by a site specific Transport Assessment).
Shripney Road/Rowan Way	The junction is forecast to operate within capacity in all 2031 scenarios. Notwithstanding, a mitigation scheme has been presented in the above referenced reports. The modelling indicates with this mitigation that the junction is forecast to operate within capacity.	The junction is forecast to operate within capacity in all scenarios. With the mitigation scheme one arm of the junction would be over capacity for a 15 minute period in the afternoon peak, however there would be spare capacity across the hour to accommodate the traffic and an overall reduction in delay to drivers. As above, it is noted that the impact would be triggered by the housing south of the railway when it comes forward and additional mitigation (if required) could be secured at that stage.
Fontwell East Roundabout	The junction is forecast to operate within capacity in all 2031 scenarios. Notwithstanding a mitigation scheme is proposed by ADC.	The junction is forecast to operate within capacity in all scenarios with and without mitigation.
Oystercatcher Junction	The junction operates over capacity in both the do minimum (without the proposed development) and do something (with the proposed development) scenarios. A mitigation scheme is put forward in the WSCC Comet Corner and Oystercatcher report (December 2019) and with this the modelling indicates the junction would operate in capacity.	With the mitigation scheme the junction is forecast to operate in capacity.
Whyke Roundabout	The junction is forecast to operate over capacity in the afternoon peak in all scenarios only. A mitigation scheme is presented in the Enterprise Bognor Regis Transport Review. With the modelling in place the performance in the PM peak will improve.	As with the 2031 scenarios, the junction is forecast to operate over capacity in the PM peak however mitigation will improve the performance of the junction.
A27/A259/Vinnetow Road	The results show that the junction is forecast to operate over capacity in the forecast year and so mitigation is required.	The results from this modelling shows that the performance of the junction is

Junction	2031 scenarios	2038 scenarios
(Bognor Road Roundabout)	Jacobs has designed a mitigation scheme and the modelling shows the performance of the junction is improved as a result.	improved overall as a result of the junction improvement scheme.
Nyton Road/Oving Road	The junction is forecast to operate within capacity in all 2031 scenarios.	The junction is forecast to operate within capacity in the morning peak. In the afternoon peak Oving Road would operate over capacity, however mitigation is not recommended to avoid potentially encouraging further traffic along Oving Road.
Barnham Road/Lake Lane	The junction is forecast to operate within capacity in all scenarios, except for a 15 minute period in the afternoon peak. The Apportionment Study for the BEW allocation requires a financial contribution towards Barnham Village Centre enhancements and so no further mitigation is proposed	The junction is forecast to operate within capacity.
A27/ A284 Ford Road / Arundel Bypass	The junction is forecast to operate over capacity in the morning and afternoon peak hours. A mitigation scheme has been modelled subject to which the junction will operate within capacity.	The junction is forecast to operate within capacity.
A27 / The Causeway Roundabout, Arundel	The junction is forecast to operate within capacity in all 2031 scenarios. Notwithstanding a mitigation scheme is proposed by ADC.	The junction is forecast to operate with spare capacity.

Source: Transport Assessment, Pell Frischmann

- 6.112 The assessment shows that the Site Allocation access junctions will perform to acceptable levels. The junctions requiring mitigation are all off-site and so it is expected that financial contributions will be secured towards these off-site highway improvements in line with the principles of the ADC Apportionment Study (2020) (alongside applications for other parcels within the Site Allocation).
- 6.113 An assessment of the Woodgate Level Crossing is also provided in Section 6.7 of the Transport Assessment. A key element of the proposed development is the full delivery of the A29 realignment which will bypass the existing level crossing leading to a substantive fall in the flow of traffic across the level crossing. In the interim period, before the delivery of the A29 south of the railway line, the modelling indicates that the queue lengths at the level crossing would be similar to those recorded in 2016 and so should not restrict the development coming forward. Furthermore, the Transport Assessment demonstrates that the strategic network would experience issues in any case were the development not to come forward. As such, the delivery of the A29 realignment will provide an important strategic highways improvement for the wider network; a position recognised in Policy HSP2c SD5 and a public benefit of the proposed development.
- 6.114 The strategic modelling undertaken has been completed in collaboration and agreement with WSCC and has concluded that, in line with paragraph 111 of the NPPF, the predicted traffic impacts resulting from the development are not severe and, therefore, planning permission should not be prevented or refused on transport grounds, with and without the full length of the proposed A29 south of the railway line being provided.

Flooding and drainage

- 6.115 The NPPF requires development to be located in areas at lowest risk of flooding (paragraph 159) and that when determining planning applications, local authorities should ensure flood risk is not increased elsewhere (paragraph 167). Major developments should also incorporate sustainable drainage systems unless there is clear evidence to suggest this would be inappropriate (paragraph 169).
- 6.116 The ADC Local Plan includes a number of key policies relating to the water environment. These are summarised as follows:
- Policy W SP1 – This relates to water in many forms and includes encouraging water efficiency measures to protect water resources and water quality. It also promotes the incorporation of SuDS as part of a surface water strategy, using them as design features to enhance waterbodies and provide flood relief.
 - Policy W DM1 – This policy relates specifically to water supply and quality, stating development will only be permitted where sufficient water supplies can be provided and not considered detrimental to existing resources. It also requires demonstration of adequate drainage capacity in the foul and surface water network. Specific advice is provided regarding any discharges to the Lidsey Wastewater Treatment Works catchment.
 - Policy W DM2 – Relates to flood risk issues, setting out a range of criteria that must be met for development to be permissible. Development must demonstrate adequate management of flood risks identified and contribute to sustainability benefits to the wider community, including a reduction in flood risk where possible.
 - Policy W DM3 – Focusses on the provision of SuDS to capture and store water on site that will also aid in improving water quality. Specific policy points relate to the suitable inclusion of SuDS measures and design criteria that should be met. These policy points align with the Local Surface Water Management Policy prepared by West Sussex County Council.
- 6.117 In accordance with national and local planning policy, a Flood Risk Assessment (FRA) has been submitted with the application (see appendix K1 of the ES). The FRA has assessed the proposed development's potential impact on the water environment, including local watercourses, changes to the runoff regime, and flood risk issues.
- 6.118 To summarise the key findings of the FRA:
- The Site is shown to be mostly in Flood Zone 1, but areas of Flood Zone 2 and 3 are attributed to the Lidsey Rife on the western boundary. There is a low risk of flooding from coastal and tidal, surface water, sewers, canals and reservoir and waterbody sources.
 - There is a risk of groundwater flooding due to shallow groundwater levels across the Site, with the shallowest levels typically to the north west of the Site, although there are no reported instances of groundwater flooding at the Site.
 - In relation to fluvial flooding, the risk from the Lidsey Rife is considered to be low. Part of the A29 realignment must cross over the Lidsey Rife. The impact of the crossing has been modelled and the crossing has no detrimental impact to flood risk off Site. Mitigation is also incorporated into the proposal with all built development outside the floodplain.
 - To mitigate the potential risk from groundwater flooding, the following measures have been incorporated into the design:
 - i A sequential test was carried out as part of the allocation in the Local Plan and confirmed the appropriateness of the Site for development. A sequential approach has informed the layout of the development with all built development within

Flood Zone 1, with the exception of parts of the A29 realignment which cross the river in the form of a bridge.

- ii It is recommended that where possible finished floor levels of new homes should be raised above immediately surrounding ground levels.
- iii Built development should be a minimum of 8m away from the top bank of the watercourse which has been incorporated into the proposed layout as far as possible. Any works within this area, such as the A29 crossing, will require a suitable flood risk activity permit from the Environment Agency.
- iv A currently culverted watercourse is proposed to be daylighted and diverted within the Site, to improve water quality, local amenity and biodiversity of the watercourse as a whole. This may also contribute to management of surface and groundwater in the locality.
- v A surface water drainage strategy based on sustainable drainage principles has been prepared and builds on the strategy outlined in the Framework Masterplan for the allocation. The strategy aligns with development parcels and construction phases so that drainage infrastructure is delivered in line with the development it serves. As the land north of the railway is a discrete parcel, the works proposed as part of the BEW SC1 application will not compromise the ability of future phases to deliver drainage independently.

6.119 In accordance with the NPPF, the FRA demonstrates the development could proceed without being subject to significant flood risk, providing some/all of the mitigation measures proposed are implemented. Furthermore, the development will not result in increased flood risk to third parties as a result of suitable management of surface water runoff. The development accords with the flood risk policies set out in the Arun Local Plan 2018.

6.120 In relation to foul water drainage, a foul drainage strategy is provided in the Residential Development Sustainable Drainage Report setting out that the proposed development falls within the catchment of the Ford Wastewater Treatment works. Discussions have been ongoing with Southern Water. the responsible authority for wastewater disposal at the application Site, and upgrade works required to accommodate flows from the proposed development are being progressed so should be available in a timescale to suit the current development programme.

Heritage and archaeology

6.121 A small part of the application Site falls within the Church Lane Eastergate Conservation Area which also contains a number of listed buildings, including the Grade II* listed St George's Church and Grade II Eastergate House. St George's Church lies directly adjacent to the northern boundary of the Site. Eastergate Square Conservation Area is located further to the north and also contains Grade II listed buildings. In addition, remnants of the Portsmouth to Arundel Canal route are located to the south of the site to be crossed by the A29 realignment route to the west of the Lidsey Oil Field.

6.122 Section 66 of the Town and Country Planning Act 1990 states that "*in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*" Section 72 of the Act states that the local planning authority also has a duty to pay special attention to the "desirability of preserving or enhancing the character or appearance" of a Conservation Area.

- 6.123 The NPPF states that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness of the historic environment and the desirability of putting heritage assets to viable use (para 197). The NPPF paragraph 202 notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.124 Arun Local Plan Policy HER SP1 states that ADC will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District, based on the following approach:
- 1 Designated heritage assets including listed buildings, structures and their settings; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance.
 - 2 Non-designated heritage assets including locally listed heritage assets (Buildings or Structures of Character and Areas of Character) and their settings will also need to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment.
- 6.125 Policy HER DM1 also requires proposals affecting listed buildings to preserve or enhance the historic character, qualities and special interest of the buildings, and to protect, and where possible enhance, the setting of the building. In relation to the canal, Policy HER DM5 states that development will be permitted where it would not adversely affect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it.
- 6.126 A Built Heritage Chapter in the ES assesses the potential impact of the proposed development on the identified heritage assets (see chapter I). This concludes that subject to the recommended mitigation, no significant residual effects are anticipated. The proposed development will generally have negligible/none or moderate/minor (low) effects on the nearby heritage assets. This is with exception to St George's Church which will be subject to a moderate beneficial effect by way of the increased public access and availability of access to appreciate views of this Grade II* listed building. In addition there are anticipated to be no significant impacts on the settings of the Conservation Areas.
- 6.127 Negligible and moderate/minor impacts are equivalent to less than substantial harm in policy terms. It is considered that the less than substantial harm to the heritage assets is at the lower end of the scale and will be outweighed by the substantial public benefits of the scheme (outlined in section 8 of this document) in line with the requirements of NPPF paragraph 202. These public benefits include the delivery of a crucial parcel of the Site Allocation with the associated housing delivery and community benefits, as well as the transport infrastructure improvements including the A29 realignment which will provide strategic benefits to the local area.
- 6.128 The Portsmouth to Arundel Canal is identified as a historic feature in the landscape – it is not a listed building. The Chapter concludes that the proposed development could have a minor to moderate adverse impact (not significant) on this feature by virtue of the A29 realignment crossing the canal; however in this location the canal line exists only as a linear depression. The proposed development is therefore not considered to have a significant impact on the remnants of the canal route.
- 6.129 In relation to archaeology, Policy HER DM6: Sites of Archaeological Interest of the ADC Local Plan states that there is a presumption in favour of preservation of scheduled and other nationally important monuments and archaeological remains. Where development would affect such a site, either directly or indirectly, or where a site proposed for development has the

potential to contain heritage assets with archaeological interest, permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological interest of these sites. Preservation in situ of archaeological remains is the favoured option, although where assessment demonstrates that this is not necessary the developer may be required to make provision for a programme of investigation and recording. Developers are required to record any heritage assets to be lost (either wholly or in part) in a manner proportionate to their importance and possible impact, and to make this evidence publicly accessible.

- 6.130 To assess the impact of development proposals at the Site, an Archaeological Desk-Based Assessment has been prepared which informs Chapter J of the ES and is appended to the ES. It identifies that the highest potential is for Roman, Medieval and Modern periods. Impacts that could potentially arise from the development are associated with the construction stage principally related to foundation footprints, access routes, services infrastructure and landscaping. Accordingly mitigation is recommended in the form of a programme of archaeological investigation to be set out in a Written Scheme of Investigation. The archaeological mitigation will be secured by planning condition and will ensure a proportionate approach to the different areas of sensitivity across the Site is taken, which accords with the ADC Local Plan policy HER DM6.

Socio-economics

- 6.131 A number of objectives are set in the Local Plan, which seek to strengthen the economic base of ADC. The Site Allocation policy also requires the provision of a community hub to include a range of services including retail, healthcare provision and a tier 7 library as well as employment uses and sport pitches.
- 6.132 The ES includes (at Chapter L) a Socio Economic assessment which considers the baseline conditions for the area surrounding the Site, before assessing the likely socio-economic effects of the proposed development during both the construction and operational phases of the scheme for the local impact area and the wider impact area (the District as a whole). The socio-economic effects are assessed across the two indicative phases of the development assuming a 10 year build period.
- 6.133 Economic benefits of the scheme include job creation both directly from the employment generating uses and from the construction phases of the development. Overall, Phase 1 (comprising neighbourhood centre, primary school and up to 920 homes including care home/senior living accommodation) is expected to generate 333 net direct and indirect full time equivalent (FTE) construction jobs per year and Phase 2 could create 319 net FTE construction jobs per year. It is also anticipated that businesses within the wider impact area would benefit from trade linkages established through the construction stage. In terms of the operation of the development, the proposed primary school and employment generating uses in the Neighbourhood Centre are anticipated to generate 113 FTE jobs. Other economic benefits of the operational phase of the scheme are:
- Economic output: Net total of £5.2m additional economic output in the form of Gross Value Added (GVA) per year in the local impact area and up to £6.2m in the wider impact area.
 - Resident expenditure: The net additional expenditure of the local impact area for Phase 1 would be c. £6.25m and could create at least 59 supported jobs in the local impact area plus a further £5.1m for first occupation expenditure (i.e. initial spends to make a house “feel like home”). Phase 2 could add a further net additional expenditure of the local impact area of c. £2.23m and estimated first occupation expenditure of £1.8m.

- 6.134 In relation to community facilities, the assessment identifies that the proposed development will deliver a mix of beneficial impacts. In terms of education, the provision of a new primary school, nursery and SEND facilities will be beneficial. The assessment is based on the delivery of a 2FE primary school for robustness however the scale and timing of delivery will continue to be discussed with WSCC during determination of the application, with space for a 3FE school allowed for within the masterplan if required. In addition, beneficial impacts are identified in relation to open space and community facilities through on site delivery. Regarding healthcare, an adverse impact is identified. However, NHS West Sussex Clinical Commissioning Group (CCG) has confirmed that it expects to seek a financial contribution for the expansion of the Croft Surgery (existing GP surgery in proximity to the development) to provide additional GP services to meet the future needs of the proposed development and wider allocation. Once delivered, the residual impacts on health services will be negligible for both the local and wider impact area.
- 6.135 With regard to employment and skills, Policy SKILLS SP1 of the Local Plan states the Council will encourage development proposals that support the raising of skill levels and increase employability and, specifically for strategic housing and employment sites, promote construction skills. It requires an employment and skills plan for the construction phase of development of more than 50 homes and for commercial schemes of more than 1,000 sqm. As noted, the Application seeks permission for a range of uses, which will be suitable for a variety of occupiers to provide employment and skills opportunities for the new and existing residents. Given the application is in outline, the appropriate timing for the submission of an Employment and Skills Plan will be agreed during the determination of the application and will likely be submitted alongside subsequent reserved matters applications.

Telecommunications

- 6.136 Policy TEL SP1 Strategic delivery of telecommunications infrastructure requires for direct access to high quality communications infrastructure to be provided to promote economic growth and opportunities to work from home. All proposals for new residential, employment and commercial development must be designed to facilitate to this high quality communications infrastructure.
- 6.137 As this application is an outline application, no specific design details have been provided on the high quality communications infrastructure, however, it is expected that each subsequent reserved matters application will demonstrate compliance with this policy.

Other environmental matters

The Environment Act (2021)

- 6.138 The Environment Act 2021 received Royal Assent on 9 November 2021. The Act includes a requirement for new developments to provide a 10% Biodiversity Net Gain (BNG). However, it should be noted that this requirement does not yet have legal effect, with a two-year transitional period and so is expected to become law in 2023. It is considered in the Ecology Chapter of the ES (Chapter F) that the Proposed Scheme will deliver a clear and demonstrable net gain in biodiversity, such that it would meet the minimum 10% requirement as outlined in the Environment Act. The nature of the outline application means an exact calculation cannot be undertaken at this stage and will be provided as part of reserved matters applications.

Ecology and trees

- 6.139 The NPPF includes clear objectives for conserving and enhancing the natural environment, including paragraph 174 which states “*Planning policies and decisions should contribute to and*

enhance the natural and local environment...”; and paragraph 180 which requires LPAs to apply a number of principles when determining planning applications including encouraging developments to integrate opportunities to improve biodiversity in and around developments, especially where this can secure measurable net gains for biodiversity or enhance public access to nature.

- 6.140 The ADC Local Plan includes a number of policies which relate to the protection and enhancement of ecological features, including Policy ENV DM3 Biodiversity Opportunity Areas; Policy ENV DM4 Protection of trees; and Policy ENV DM5 Development and biodiversity. BE NP Policy ES15 requires new developments within or adjacent to Biodiversity Corridors to not give rise to any significant harm to the integrity or function of the Biodiversity Corridor with development required to contribute to, increase and enhance the natural environment. Aldingbourne NP Policy EH2 presents similar wording regarding Biodiversity Corridors within its areas. Similarly, with respect to trees, BE NE Policy ES10 states that developments that result in the loss or adverse impacts on trees or hedgerows or arboricultural, amenity or historic value should demonstrate that benefits clearly outweigh the harm or loss.
- 6.141 There are no statutory or non-statutory designated sites of nature conservation interest located within or adjacent to the Site. The vast majority of the Site comprises intensively managed arable land, which provides very few opportunities for faunal groups and is of negligible ecological interest. However, features such as streams, hedgerows, tree lines and grassland within the Site are of greater interest, both in terms of the intrinsic value of the habitats present as well as the potential opportunities that they provide for faunal species.
- 6.142 Species and groups recorded within the Site and local area include an assemblage of breeding birds, foraging and commuting bats, common reptiles, Water Voles and Badgers. Due to the current management regime at the Site, opportunities for these species / groups are largely limited to the stream corridors and/or hedgerows which pass through the Site, with the arable land providing few, if any, opportunities.
- 6.143 Given the existing baseline, it is considered that there is significant scope to not only safeguard existing features of interest, but moreover to deliver improvements, both in terms of the quantity and quality of habitats, and in turn the opportunities that they provide for wildlife. The ES Ecology Chapter (Chapter F) identifies that the Lidsey Rife Linear Park will deliver significant enhancements in terms of biodiversity which will provide a biodiversity net gain.
- 6.144 In relation to protected species, the ecology assessment concludes the following:
- Moderate levels of bat activity have been recorded. The favoured habitats of the bats in terms of the Lidsey Rife stream will be retained and enhanced by the development. Bat boxes are also recommended.
 - There will be a significant enhancement in the opportunities for Badger across the Site.
 - Water Vole are present on the Site and the Water Vole habitat comprising the Lidsey Rife Stream will be retained. No overriding impacts are anticipated from the construction of the A29 realignment bridge over the rife with considerate positioning of columns and piers.
 - The Site is utilised by a range of common birds and the vast majority of the key bird habitat will be retained. In addition the delivery of species rich habitats will improve opportunities for nesting and foraging birds. Bird nesting boxes are also recommended.
 - Small populations of Common Lizard, Slow-worm and Grass Snake have been identified on Site. Mitigation measures are recommended in the form of ecologist supervision of construction works; translocation of populations to suitable receptor locations adjacent to the Lidsey Rife; and management of suitable habitat locations to ensure longevity of populations. Subject to these measures, there will be beneficial effects for lizards.

- 6.145 During the construction stage, best practice construction methods are recommended to ensure that there will be no significant adverse impacts on the protected species.
- 6.146 Overall, the proposed development is considered to lead to improvements for ecology and nature conservation with the implementation of the recommended mitigation and enhancement measures. As set out above, it is considered that the Proposed Scheme will deliver a clear and demonstrable net gain in biodiversity, such that it would meet the minimum 10% requirement as outlined in the Environment Act (although the relevant requirement is not yet in force). The development will therefore comply with Local Plan Policy ENV DM3 by minimising disturbance to habitats and incorporating opportunities for enhancement. Moreover, in line with Policy ENV DM5 the development will achieve a net gain in biodiversity, including through incorporation of bird and bat boxes.
- 6.147 The BE NP identifies Biodiversity Corridors along the Lidsey Rife and the Public Right of Way running east to west in the north of the Site. The proposed development incorporates these into the scheme as part of the Lidsey Rife Linear Park and the Green Link. In line with BE NP ES15 the ES Ecology Chapter assessment considers these features as part of the proposed development, concluding that there will be no significant adverse impacts. In particular, the design of these features will contribute to achieving the opportunities identified in the policy for the corridors, including suitably managing land and water environments to manage the risk of flooding; providing more natural habitats; improving opportunities for residents health and well being through the pedestrian and cycle links along these corridors; and introducing new planting. The proposed development therefore accords with BE NP Policy ES15. Similarly with respect to the Biodiversity Corridors identified within the Aldingbourne NP, no significant harm is considered to arise in accordance with Policy EH2.
- 6.148 With respect to trees, Local Plan Policy ENV DM4 states that development will be permitted where it can be demonstrated that trees protected by Tree Preservation Order (TPOs) or that contribute to local amenity will not be damaged or destroyed unless in the interest of good arboricultural practice or where the benefits of the development outweigh the loss. In these instances, the policy requires the provision of an equivalent number of replacement trees.
- 6.149 As required by the policy an Arboricultural Assessment has been undertaken by Pell Frischmann. Table 4.1 of the report identifies the trees that are subject to TPOs. The report includes a draft Tree Retention Plan in Appendix C and an assessment of likely impacts in Section 5. Wherever possible the proposed development proposes to retain existing trees and hedgerows as shown on the Green Infrastructure Parameter Plan. The parameter plan allows for all TPO trees within TPO groups to be retained. For trees that are to be removed, the impact of this will be mitigated by the significant and varied areas of landscaped open space proposed as part of the development and the creation of new habitats as illustrated the Landscape Strategy. The proposed development will therefore comply with Policy ENV DM4 and BE NP ES10.

Landscape

- 6.150 A Landscape and Visual Impact Assessment has been undertaken and forms Chapter E of the ES with the technical appendices forming E1-3 of the ES. This document provides a description of the baseline conditions alongside a prediction of the landscape and visual impacts arising from the proposed development. The assessment of impact has then been carried out to identify and assess effects during the stages of the proposed development and possible mitigation measures to reduce the impacts as much as possible.
- 6.151 Policy LAN DM1 Protection of landscape character of the Local Plan applies which requires development within the setting of the South Downs National Park to have special regard to the conservation of the setting, including views into and out of the Park. Development is also

required to respect the particular characteristics and natural features of the relevant landscape character areas and seek to reinforce the character of those areas. BE NP Policy ES4 seeks to maintain open views if possible.

6.152 Specifically in relation to the South Downs National park, the design of the proposed development has had regard to the conservation of its setting and inter-visibility of views as required by the policy. The application Site forms a distant and very small component of the panoramic view across the settled coastal plain. The LVIA concludes that there will be a minor adverse effect on the landscape setting to the South Downs National Park.

6.153 Chapter E concludes that, as with the development of any greenfield site, a range of both beneficial and adverse effects will occur. A number of these effects are considered significant in EIA terms; however, the LVIA notes that the effects at this outline stage have been minimised as far as possible. Further measures are proposed to be considered at the reserved matters stage such as creating variety to the roofscape and the materiality of the elevational treatments. The most significant effects are limited to those on the land use, land cover, vegetation and therefore the landscape character of the Site, alongside those visual receptors in close proximity to the Site.

Air quality

6.154 Air quality is considered in the NPPF under paragraphs 185 and 186. These paragraphs seek to ensure that new developments are appropriate for their location taking into account any likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, and that developments sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

6.155 ADC Local Plan policy QE SP1 states that all development should contribute positively to the quality of the environment and ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District. The location of existing industrial and commercial uses, including waste management uses, must be taken into consideration when assessing proposals for development sensitive to noise, light, odour and outputs to air.

6.156 In addition, Policy QE DM3 on air pollution requires all major development to assess the likely impacts of the development on air quality and mitigate any negative impacts by:

- Ensuring the development is located within easy reach of established public transport services;
- Maximising provision for cycling and pedestrian facilities;
- Encouraging the use of cleaner transport fuels on Site, through the inclusion of electric car charging points; and
- Contributing towards the improvement of the highway network where the development is predicted to result in increased congestion on the highway network.

6.157 Development proposed near any Air Quality Management Area (AQMA) within the District within the Plan period will require an air quality assessment to identify likely impacts upon the designated area.

6.158 The Chapter G Air Quality of the ES prepared by Air Quality Consultants Ltd has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter

emissions during construction, and emissions from road traffic generated by the completed and occupied development.

- 6.159 It has also identified the air quality conditions that future residents will experience. Damage cost calculations have been carried out in accordance with Air Quality and Emissions Mitigation Guidance for Sussex Authorities. The assessment has been based on measurements made during 2019, and pre-pandemic activity and emissions forecasts, to ensure a worst-case assessment that does not take into account temporary reductions in pollutant concentrations as a result of reduced activity levels during the Covid-19 pandemic.
- 6.160 The proposed development is consistent with paragraph 185 of the NPPF, being appropriate for its location both in terms of its effects on the local air quality environment and the air quality conditions for future residents, subject to the mitigation measures recommended during construction stage. The proposed development is also consistent with paragraph 186, as it will not affect compliance with relevant limit values or national objectives.
- 6.161 While the proposed development will generate additional traffic on the A286 in Chichester, it will not significantly affect air quality at properties along this road, thus it is judged not to affect Chichester District Council's ability to implement its Air Quality Action Plan. As the overall air quality effect of the proposed development is considered not significant, it is not considered appropriate to propose further mitigation measures during the operation of this development.

Noise and vibration

- 6.162 The NPPF (para 174 part e) requires planning decisions to contribute to the natural environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution.
- 6.163 The ADC Local Plan includes the following policies which are relevant to the potential effects of noise and vibration arising from the proposed development:
- Policy QE DM1 Noise pollution – This expects new noise sensitive development such as residential uses close to the listed road, rail or air infrastructure to be supported by a noise exposure category assessment and to be designed to ensure residents will not be adversely affected by noise. The policy also considers new noise generating development.
 - Policy D DM1 Aspects of form and design quality – The design of new development should have minimal impact to users and occupiers of nearby property and land and avoid unacceptable noise and disturbance.
- 6.164 Chapter H of the ES contains a Noise and Vibration assessment in relation to the scheme. This assessment considers the effects relating to noise and vibration during the construction and operation phases of the proposed development. The assessment has predicted that with embedded mitigation, the effects from construction noise, traffic and vibration are not significant. Suitable piling methods are identified within the CEMP to reduce vibration levels.
- 6.165 The assessment has predicted that permanent minor traffic noise effects are not significant. The acoustic mitigation report at detailed design stage will ensure that the glazing specification of any new dwellings will be sufficient to mitigate against the future noise environment.
- 6.166 The assessment has predicted that the effects of building service emissions from the proposed development are not significant. The acoustic mitigation report at detailed design will ensure that any required noise mitigation will be incorporated into the design of the building services plant and will be in place before the relevant part of the scheme is completed and ready to open.

6.167 Furthermore, a noise mitigation report will ensure that the layout of the proposed development will provide sufficient acoustic screening to the surrounding community from noise generated by the proposed realignment of the A29.

6.168 It is considered the Site complies with Local Plan Policies QE DM1 and D DM1.

Land contamination

6.169 The NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (paragraph 174). Policy QE DM4 promotes the remediation of contaminated land but requires any development to demonstrate that any unacceptable risk from contamination has been addressed through remediation. Developers are expected to carry out adequate investigation to inform a risk assessment.

6.170 A Phase 1 Land Contamination Desk Study has been completed by Pell Frischmann which assesses the application Site and the land within the wider allocation for comprehensiveness. It concludes that there is a moderate risk of inhalation of ground gas by end users in the southern area of the Site associated with the A29 realignment route. Accordingly, a geotechnical and geoenvironmental assessment is recommended and this is expected to be secured via condition. This will inform whether remediation measures are required in line with Local Plan Policy QE DM4.

Mineral resources

6.171 A small area in the north of the application Site is within a Sharp Sand and Gravel Minerals Safeguarding Area. Policy M9 refers to the safeguarding of Minerals Resources and states that proposals for non-mineral development within the Minerals Safeguarding Areas will not be permitted unless the overriding need for the development outweighs the safeguarding of the minerals and it has been demonstrated that prior extraction is not practicable or environmentally feasible.

6.172 A Minerals Resource Assessment has been undertaken by Pell Frischmann. The report considers the feasibility of prior extraction. It concludes that the geotechnical constraints identified result in prior mineral extraction being economically unfeasible. In addition, there are additional shallow mineral resource areas in the surrounding area that can be utilised for sand and gravel banks. Overall, the report identifies that the overriding need for development to meet the local housing need outweighs the safeguarding and prior extraction of the mineral resource in compliance with Local Plan Policy M9.

Environmental statement

6.173 Significant assessment work has been undertaken by the applicant's team to build environmental improvements and mitigation into the design of the Proposed Development and reduce adverse effects as far as is possible. Based on the findings of the ES, it can be concluded that there are minimal 'significant residual adverse environmental effects' resulting from the proposed development. 'Embedded' mitigation measures are proposed within the parameter plans to address any adverse effects identified. Further mitigation measures will be secured by condition or via the s106 agreement.

6.174 Overall, the ES demonstrates that all mitigation required to appropriately address likely significant environmental effects of this Proposed Development can be secured to an acceptable level.

- 6.175 Additional technical and environmental assessments will be undertaken to support the detailed designs, which will be the subject of future reserved matters planning applications. This will ensure that the environmental effects of the proposed development will remain consistent with, or improve upon, those concluded within the ES.

Summary

- 6.176 This section provides an assessment of the proposed development at the Site in relation to relevant national and local planning policy and guidance.
- 6.177 In summary, the proposed development is wholly in compliance with the Site Allocation policy requirements under Policy HSP2c SD5 and will deliver significant infrastructure necessary to benefit the wider allocation and local community. The proposal will provide high quality flexible non-residential floorspace and deliver social infrastructure including a school, in addition to delivering up to 1,250 residential dwellings, making an important contribution towards pressing strategic and local housing objectives. The scheme presents an efficient and sustainable use of this accessible Site and has been designed to complement the character of the local area.
- 6.178 It is therefore considered that the proposed development is consistent with the Development Plan and NPPF, in that it seeks to boost significantly the supply of housing on an allocated, accessible Site where development would be sustainable.

7.0 **Draft Section 106 Heads of Terms and conditions**

7.1 The NPPF (paragraph 56) sets out that planning obligations will only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development.

7.2 Regulation 122 in the Community Infrastructure Levy Regulations Order 2015 states the following:

“(1) This regulation applies where a relevant determination is made which results in planning permission being granted for development.

(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

- (a) necessary to make the development acceptable in planning terms;*
- (b) directly related to the development; and*
- (c) fairly and reasonably related in scale and kind to the development.”*

7.3 Policy INF SP1 of the Local Plan also states ADC will support development proposals which provide or contribute towards the infrastructure and services needed to support development (including the necessary infrastructure set out in the Infrastructure Delivery Plan) to meet the needs of occupiers and users of the development and the existing community.

7.4 Policy H SP2 requires that strategic allocation sites provide for the required infrastructure that relates to that particular allocation, in accordance with Policy INF SP1 and the Infrastructure Delivery Plan and address the off-site capacity requirement, that relate to that particular allocation, identified in the Arun Transport Assessment (2016 and update 2017 and taking into account subsequent relevant assessments) and the local highway network.

7.5 There is a requirement, therefore, for this development to provide financial and non-financial contributions (to be secured by planning obligations within a S106 legal agreement) towards infrastructure provision. The draft S106 Heads of Terms are set out below:

- 1 Affordable housing – onsite delivery – percentage to be confirmed subject to viability assessment
- 2 Transport
 - a Delivery of the East-West Link Road within the Site
 - b Delivery of additional car parking at the Station
 - c Contributions to a new bus service
 - d Financial contributions towards highways works including off-site improvements to:
 - i A27/ Fontwell Avenue
 - ii Shripney Road / Charles Purley Way
 - iii Shripney Road / Rowan Way
 - iv B2145/ A27 (Whyke Roundabout)
 - v A27/ A259/ Vinnetrow Road (Bognor Road Roundabout)
 - vi A27/ A284 Ford Road / Arundel Bypass

- vii A27 / The Causeway Roundabout, Arundel
- viii A27/A29 Fontwell Eastern Roundabout
- ix A259 Oystercatcher junction
- x A259 Corridor Improvement Bognor Regis-Littlehampton
- xi Barnham Village Improvements

3 Education

- a Delivery of plot for primary school, nursery and SEND provision
- b Financial contributions towards primary school, nursery and SEND provision, or on-site delivery.
- c Financial contributions towards 10FE secondary school at Ford
- d Financial contribution towards sixth form provision

4 Green infrastructure

- a On-site delivery of new accessible green spaces for recreation within the Site (public open space)
- b On-site delivery of cricket pitch and associated small scale pavilion and parking
- c Public Open Space maintenance contributions (unless management company appointed)
- d On-site delivery of playspace
- e Play maintenance contribution (unless management company appointed)

5 Community

- a On-site delivery of community hall
- b Financial contributions towards health services (expected to be financial contribution towards expansion of the Croft Surgery)
- c Contributions towards fire and rescue services
- d Police services
- e Public art

7.6 Regarding the open space within the Site, it is expected that the ongoing management of the open space and its facilities will be provided through one of the following options.

- Management by private management companies funded via a service charge on new residents and businesses;
- Management by a community body/stewardship scheme funded via a service charge on the new residents and businesses; or
- Adoption by Arun District Council with a commuted sum to oversee the future management of the Site.

7.7 It is possible that these management options vary across the Site depending on the open space. For example, ADC may adopt the Linear Park and a management company may maintain the other areas. This will be discussed and an approach agreed with ADC during the determination of the application.

Community Infrastructure Levy (CIL)

- 7.8 Arun District Council approved the Arun CIL Charging Schedule on 15 January 2020; coming into effect on 1 April 2020.
- 7.9 The extent to which S.106 obligations are appropriate for any development proposal will depend on whether CIL is applicable to a development. For example, where development is proposed which is for a type, and in a location where CIL applies, then the development will be charged CIL on a £/sqm basis and S.106 will only be used to deliver affordable housing (where applicable), and any on-site mitigation. However, in some cases, development is 'zero' rated for CIL.
- 7.10 As a strategic development site, land at BEW is zero rated for CIL.

Conditions

- 7.11 It is anticipated that the planning permission will be subject to conditions and the applicant welcomes the opportunity to discuss these with ADC as consultee responses are received and the application progresses. The wording and structuring of the conditions should enable to development to proceed in phases over an extended period of time.
- 7.12 It is envisaged that conditions around the following matters will be necessary:

Table 7.1 Planning conditions envisaged to be necessary

Matter	Requirement
Road related conditions	
Highways design	Conditions requiring detailed construction and landscaping details for A29 realignment, including extent of the boundary for the road works and any earthworks required, prior to construction of the relevant phase of such works
Road zone – South of the railway	Conditions requiring details of the temporary landscaping treatment within the A29 road zone (where not required for earthworks) prior to adjacent land parcels coming forward.
A29 junction and crossing locations	Conditions requiring details of the positioning of junctions and crossings indicatively shown on the highways drawings to show how these will interact with the neighbouring residential parcels
General conditions	
Approved drawings	Conditions setting out approved parameter plans and highways drawings for the development
Timescales for delivery	A condition requiring that no development is occupied until Phase 1 of the A29 realignment has been delivered (by WSCC)
Phasing	A condition requiring details of the phases of the proposed development
Timescales for reserved matters	A condition setting out a timescale for implementation of the permission including a timescale for submission of a first reserved matters application and a timescale for submission of all reserved matters (a 'long-stop date' reflecting the phased nature of development). The applicant considers that the long-stop date for reserved matters should be no less than 15 years with five years to implement
Reserved matters (except for the A29 realignment which will be conditioned)	A condition for the approval of details of the access, layout, landscaping, appearance and scale on a phased basis.

Matter	Requirement
Amount and use of development	Conditions limiting the amount and use of development to ensure it reflects that tested in the Environmental Impact Assessment.
Travel Plans	Conditions requiring a phased travel plan for residential and non-residential uses across the Site
Cycle Routes	Delivery of on-site cycle routes including the Green Link cycle route
Car and cycle parking	Conditions requiring car, electric vehicle and cycle parking spaces prior to occupation of the relevant parcel
Sustainability	Condition requiring the submission of a phase specific sustainability strategy with reserved matters applications
Design	Condition requiring compliance with the Design Principles Document
Archaeology	Pre-commencement condition requiring the submission of an archaeological written scheme of investigation for relevant phases
Trees	Condition requiring submission of a Tree Management Plan to ensure all trees are adequately protected during development and maintained.
Contamination	Condition requiring a detailed Phase 2 geotechnical and geoenvironmental ground investigation and details of appropriate remediation measures as necessary for relevant phases
Construction	Condition requiring a Construction Environmental Management Plan (CEMP)
Landscape and environment	Condition requiring a Landscape and Environmental Management Plan (LEMP)
Noise	Conditions requiring compliance with maximum noise limits for building services plant and a building services plant mitigation report on a phased basis.
Foul and surface water drainage	Conditions requiring detailed foul and surface water drainage strategies on a phased basis.
Lighting	Condition requiring details of a lighting strategy on a phased basis

8.0 Conclusions

- 8.1 The application Site forms part of the BEW strategic allocation within the Arun Local Plan and will make a substantial contribution to meeting local housing need. Importantly, alongside a significant number of new homes, this planning application will deliver crucial infrastructure that is integral to the delivery of the wider allocation and in turn the benefits this will deliver.
- 8.2 The application seeks outline planning permission for the A29 realignment south of Barnham Road; up to 1,250 new homes including a care home/senior living accommodation; a primary school with nursery and SEND provision; Neighbourhood Centre; a large proportion of the Lidsey Rife Linear Park; and other associated works including vehicle, walking and cycling connections. The highways design for the A29 realignment is submitted in detail and it is proposed that further construction and landscape design information is secured by condition (i.e. no reserved matters required). All other aspects of the scheme are submitted in outline for which reserved matters application will come forward with details of access, layout, scale, appearance and landscaping.
- 8.3 Paragraph 38 of the NPPF sets out that Local Planning Authorities should “*approach decisions on proposed development in a positive and creative way... and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*” This planning application – on an allocated site within an adopted local plan, which will significantly contribute towards improving the economic, social and environmental conditions of Arun – is a perfect example of where this principle applies.
- 8.4 Overall, the application presents a sustainable development with the potential impacts positively addressed and appropriate mitigation. It will deliver a number of substantial planning and public benefits including:
- 1 Facilitation of delivery of the wider allocation through the provision of integral infrastructure necessary to unlock these land parcels and realise ADC’s ambitions for growth to 2031 and beyond.
 - 2 The remainder of A29 road realignment including the crossing of the railway line, subject to land and funding availability, which critically, will unlock the other land parcels as well as increase highways capacity for the wider strategic network to the benefit of the existing local community.
 - 3 1,250 new homes including a care home/senior living accommodation making a significant contribution towards meeting local need, including contribution of the maximum viable level of affordable housing.
 - 4 Modest extension to the existing built development at Eastergate and Barnham through residential parcels on the northern site boundary and adjacent to the Warwick Nursery and Boweries parcels, in an area referred to as the ‘mini-masterplan’;
 - 5 High quality placemaking, including delivering the first parcel forming a new community, physically separate from the existing villages, with design principles tailored to its context, creating a distinct sense of place.
 - 6 Primary school, nursery places and SEND provision which will provide school places for the application Site and the other land parcels coming forward within the allocation.

- 7 A Neighbourhood Centre with retail, commercial and community facilities to support the allocation and the wider community. This in turn, along with the primary school provision, will support 113 FTE jobs.
 - 8 Other economic benefits include £5.2 million additional economic output (Gross Value Added) in the local impact area and a net additional resident expenditure of c. £6.25 million in Phase 1 and c. £2.23 million in Phase 2.
 - 9 The majority of the East-West Link Road north of the railway line which will ultimately provide direct connections from the Westergate towards Barnham Railway Station (with the remainder to be delivered in the Cala land parcel).
 - 10 Additional surface level car parking for Barnham Station; an essential requirement of Barnham and Eastergate Parish Council for the development and the High Level Development Principles.
 - 11 An extensive network of pedestrian and cycle routes throughout the Site to create walkable neighbourhoods and tie in with the wider allocation and surrounding communities; including direct and attractive routes to the railway station in the form of an appealing pedestrian and cycle link via Gospond Road; and cycle route through the Linear Park to form part of the 'South Downs to Coast' route. These are all important policy requirements and aspirations.
 - 12 Land for a cricket pitch and small pavilion to contribute to the new sports pitch and changing facilities provision.
 - 13 The majority of the Lidsey Rife Linear Park following the route of the Lidsey Rife and over 31ha of public open space that the new residents and the existing community will be able to use.
 - 14 Retention, enhancement and expansion of existing ecological features across the Site, particularly the Lidsey Rife and the Biodiversity Corridors, which in turn will deliver net gains in biodiversity.
- 8.5 Overall, it is concluded that the proposed development would deliver much needed new homes and embody the principles of sustainable development promoted through the NPPF (2021).
- 8.6 The development will generate a significant number of social, economic and environmental benefits as set out in this Statement, the accompanying documents and Environmental Statement.
- 8.7 The Application accords with relevant planning policy objectives as set out in the Development Plan and endorsed Framework Masterplan as well as the NPPF and is therefore deemed to be entirely appropriate. On this basis, if NPPF paragraph 11c were to apply, planning permission should be granted without delay. We note that the correct position is that paragraph 11(d) and in turn the tilted balance should apply, which emphasises why planning permission should be granted in this case.
- 8.8 For the reasons set out above and in this planning statement, it is concluded that Outline Planning Permission should be granted.

Appendix 1 Local centre assessment

1.0 **Assessment of proposed local centres**

- 1.1 This section assesses the quantitative scope for new retail, food/beverage and service floorspace that could be provided to support the needs arising from the development. This assessment draws on information from the Arun Retail Study Update 2016.
- 1.2 The proposed development will provide important shops, services and other facilities to help meet the needs of new residents, which will create sustainable shopping patterns. The proposed local centre will create a focal point and a sense of 'place' for residents, which will foster community spirit and encourage social interaction. The proposed local centre will provide the following:
- up to 1,000 sq.m gross of Class E retail, non-retail services and food/beverage outlets; and
 - up to 250 sq.m gross of Class F2 community hall space.
- 1.3 The quantitative capacity analysis examines projected levels of spending for convenience and comparison retail goods and food/beverage (eating and drinking away from the home). The need and impact assessment is based on Experian's latest forecasts, published in October 2020. These forecasts are more cautious than previous projections and take account of likely implications of the coronavirus crisis and Brexit in the short, medium and long term.
- 1.4 Retail, service and food/beverage uses are defined as main town centres uses within the revised National Planning Policy Framework (NPPF). The assessment in this section includes three main elements of work, as follows:
- 1 an assessment of the quantitative and qualitative need for retail, service and food/beverage uses at BEW to meet the day to day needs of the new residents;
 - 2 identification of the types of retail and service uses that should be provided to serve the proposed development; and
 - 3 building on the quantitative retail need assessment, an analysis of potential impact and implications for designated centres.

Relevant planning policy

- 1.5 A revised National Planning Policy Framework was published in February 2019 and revised in July 2021. The NPPF (paragraph 92) identifies the need to plan positively for community facilities including local shops. In relation to large residential developments, paragraph 73 indicates that new homes can be provided within new settlements or significant extensions to existing villages, provided they are well located and designed, and supported by the necessary infrastructure and facilities. This objective requires access to services and employment opportunities within developments. The benefits of providing an appropriate mix of uses within large scale development in terms of sustainable transport (minimising the number and length of journeys) is highlighted (paragraph 106).
- 1.6 In terms of retail uses, planning policies and decisions should support the role that centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should allocate a range of suitable sites to meet the scale and type of development likely to be needed. Meeting anticipated needs for retail, leisure, office and other main town centre uses should not be compromised by limited site availability. Where suitable and viable town centre and edge of centre sites are not available for main town centre uses, policies should explain how identified needs can be met in other accessible locations.
- 1.7 Applications for retail and town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan will be assessed against NPPF policies and the key

sequential and impact tests. The Barnham/Eastergate/Westgate strategic housing allocation SD5 is within the up-to-date adopted Arun Local Plan. This allocation refers to the provision of a Community Hub which will include “a new well connected local centre, with connections to the train station at Barnham” and “new retail, commercial and community facilities”. The location and scale of the local centre is expected to support and respect existing facilities with the six villages areas. The scale and mix of uses are not specified in SD5 and there is no policy requirement to prepare a retail impact assessment or sequential site analysis. However, in order to assist the Council’s consideration of this planning application an analysis has been prepared to assess the potential implications of the proposed local centre.

- 1.8 The sequential approach test indicates main town centre uses should locate in town centres, then in edge of centre locations; and only if suitable sites are not available (within a reasonable period) should out-of-centre sites be considered (para. 87).

- 1.9 A new local centre, not proposed in an up-to-date development plan, is technically in an out-of-centre locations. The National Planning Policy Guidance (NPPG) suggests certain main town centre uses have particular market and locational requirements, which mean they may only be accommodated in specific locations i.e. not always within designated town centres. Robust evidence is required to demonstrate a locational specific requirement when applying the sequential test.

- 1.10 A key consideration relating to a location specific requirement is whether the scale and type of development is commensurate with the proposed development i.e. do the retail and town centre uses primarily serve local needs generated by the development or do they have a much wider catchment area. If the scale or type of development has a wider catchment area and is significantly over and above that required to serve local needs, then some of the proposed uses could be located within a nearby town centre, where the scale of development would be better placed to serve a wider catchment area. On this basis a locational specific requirement could not be demonstrated by robust evidence.

- 1.11 The NPPF states that local planning authorities should require an impact assessment for applications for retail and leisure development outside of town centres, which are not in accordance with an up-to-date development plan and are over a proportionate, locally set floorspace threshold. Where there is no locally set threshold, the default impact threshold is 2,500 sq.m (para. 90). Paragraph 9.2.1 of the Arun Local Plan indicates a lower impact assessment threshold of 1,000 sq.m, but impact assessments should be appropriate to the scale of development proposed. An impact assessment should include:
 - a the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

- 1.12 Where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one of more of the above factors, it should be refused (para. 90). In this case, the sequential approach does not apply because the provision of a Community Hub is proposed within the Barnham/Eastergate/Westgate strategic housing allocation SD5 in an up-to-date plan.

Methodology and base data

- 1.13 The quantitative assessment for the proposed new local centre includes the following:

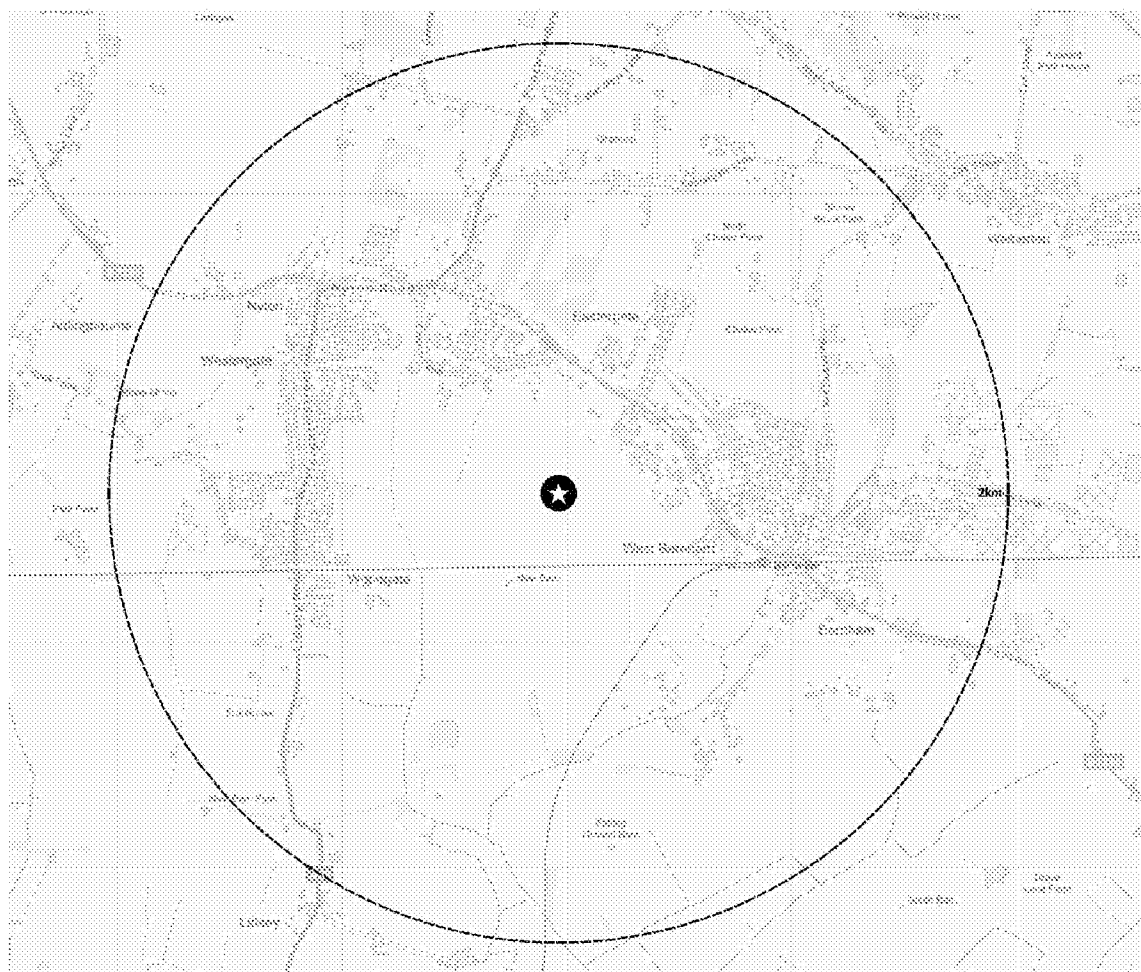
- 1 identification of an appropriate catchment area for the proposed new development. Experian population and local expenditure projections have been obtained;
- 2 estimations of the existing trade draw and trading performance of existing retail facilities in Arun District, drawing on information from the Arun Retail Study Update 2016; and
- 3 an assessment of the future quantitative capacity for retail uses (comparison, convenience goods and food/beverage) generated by the new dwellings and existing population within the local catchment area, provided at 2030, linked to the completion of new homes and the new local centre within the development.

1.14 All monetary values expressed in this report are at 2019 prices. The base year adopted for the impact assessment is 2021, although turnover and expenditure figures for this year are expressed at 2019 prices.

Catchment area

1.15 The quantitative analysis is based on an identification of an appropriate catchment area for the proposed local centre. The primary catchment of proposed local centre is unlikely to extend beyond 2 kilometres as shown in Figure A1.1.

Figure A1.1 Barnham/Eastergate/Westergate - 2 km catchment area



1.16 This area includes the entirety of the proposed development and represents an appropriate local catchment area for the new local centre. It should be noted that this local centre catchment area

is smaller than the local impact area adopted for the socio-economic impact assessment, because the retail and service facilities are expected to have a more localised draw.

Population and expenditure

- 1.17 The indigenous population within the 2km local catchment area is 9,080 people in 2021 (source: Experian). Excluding the BEW development, population within the local catchment area is not expected to change significantly in the future. The BEW development seeks to provide 1,250 dwellings to be phased between 2023 to 2033. Table A1.1 sets out expected population growth, based on the expected phasing of development. An average of 2.5 people per dwelling has been assumed for the new dwellings.

Table A1.1 Expected dwelling delivery at Barnham/Eastergate/Westergate

	2021	2030	2033
BEW dwelling delivery	0	920	1,250
New population	0	2,300	3,125

- 1.18 Population projections within the local catchment area (indigenous and new homes) will increase from 9,080 in 2021 to 11,380 by 2030 and 12,205 by 2033. Assessing future expenditure levels within this report needs to consider economic prospects, particularly in the short and medium term. Careful consideration is needed to establish the appropriate level of expenditure growth to be adopted over the development period. Trends in population growth, home shopping/internet sales and growth in turnover efficiency also need to be considered and a balanced approach taken.
- 1.19 Historic trends indicate that consumer expenditure has grown consistently in real terms, generally following a cyclical growth trend. This growth fuelled demand for new retail floorspace. Experian's pre-Covid forecasts suggested slower expenditure growth overall but with home shopping/internet spending growing at a much faster rate than traditional shopping. Experian's latest short-term expenditure growth projections (2020 and 2021) for retail and leisure now reflect Brexit and the Coronavirus pandemic. Reflecting these recent trends, Experian's latest projections recommend relatively modest levels of growth when compared with historic trends.
- 1.20 For convenience goods, Experian's latest forecasts (October 2020) anticipate limited growth (0.1% per annum after 2026). Experian expects slow growth in the future, but most of the growth will relate to non-store sales. Any need for new convenience goods retail floorspace is likely to relate to population growth or qualitative areas of deficiency.
- 1.21 For comparison goods, higher levels of growth are expected in the future (between 2.9% to 3% per annum), still at a lower rate than previous pre-recession trends (8% per annum between 1997 and 2007). Historically comparison goods expenditure has grown significantly more than convenience goods expenditure, and Experian's latest national growth rate recommendations are consistent with these past trends.
- 1.22 The need and impact assessment in this report make an allowance for future growth in e-tailing based on Experian projections. Given the likelihood that multi-channel expenditure will continue to grow at a faster pace than other consumer expenditure, the assessment adopts relatively cautious growth projections for expenditure and an allowance is made for growth in home shopping. This home/e-tailing expenditure will not generate demand for traditional floorspace and has therefore been subtracted from the need and impact analysis, consistent with standard practice.

- 1.23 Experian's latest EBS national expenditure information (Experian Retail Planner Briefing Note 18 - October 2020) has been used to forecast expenditure. Experian's short term EBS growth forecast rates during 2020, 2021 and 2022 reflect current economic circumstances, including the current Covid-19 crisis. The forecast changes during this period are as follows:
- 1 convenience goods: +4.2%;
 - 2 comparison goods: +1.2%;
 - 3 leisure: -12.6%.
- 1.24 These short-term forecasts, particularly for comparison goods and leisure, are relatively cautious. Experian's medium and long-term growth average forecasts have been adopted, as follows:
- 1 convenience goods: 0% per annum growth for 2023 to 2027 and +0.1% per annum after 2027;
 - 2 comparison goods: +3.0% per annum growth for 2023 to 2027 and +2.9% per annum after 2027; and
 - 3 leisure: +2.9% per annum growth for 2023 to 2027 and +0.9% per annum after 2027.
- 1.25 These growth figures relate to real growth and exclude inflation.
- 1.26 Experian's latest adjusted deductions for SFT (i.e. home and online shopping through non-retail businesses) in 2019 were:
- 1 4.2% of convenience goods expenditure; and
 - 2 17.5% of comparison goods expenditure.
- 1.27 Experian's projections suggest that these percentages will increase to 6.9% and 27.2% by 2031 respectively. The long-term Experian projections suggest an increase to 7.2% and 28.2% by 2036 respectively. Table A1.2 sets out the updated forecasts for spending per head on convenience and comparison retail goods within the catchment area up to 2036, excluding SFT. Total available expenditure is shown in Table A1.3. These figures relate to real growth and exclude inflation.

Table A1.2 Expenditure per capita projection in the BEW catchment area (£ per annum)

	2021	2030	2033
Comparison retail goods	3,258	3,994	4,304
Convenience retail goods	2,284	2,262	2,264
Food/beverage (eating/drinking out)	1,114	1,516	1,557
Total	6,656	7,772	8,125

Table A1.3 Total available expenditure per capita projection in the BEW catchment area (£ million per annum)

	2021	2030	2033
Comparison retail goods	29.59	45.45	52.52
Convenience retail goods	20.74	25.74	27.63
Food/beverage (eating/drinking out)	10.11	17.25	19.00
Total	60.44	88.43	99.15

Source: Experian's population and local expenditure estimates and projections.

1.28 New residents within the BEW development are expected to generate £25.39 million of expenditure by 2033 that would not otherwise be available, broken down as follows:

- comparison goods expenditure = £13.45 million;
- convenience goods expenditure = £7.07 million; and
- food/beverage expenditure = £4.87 million.

Future spending patterns

1.29 As indicated above, population and expenditure within the local catchment area are projected to grow significantly. Shops and services within this area currently retain a very low proportion of retail expenditure. As a minimum, the BEW development should seek to meet the day to day needs of residents within the local catchment area in order to minimise the need to travel for items and service purchased on a regular basis.

1.30 The development of the local centre at BEW provides an opportunity to increase expenditure retention within the local catchment area by improving the range and choice of facilities available. Future floorspace capacity has been assessed based on expected expenditure retention from both new BEW residents and the indigenous population within the 2-kilometre catchment area. Realistic minimum expected expenditure retention rates/market shares are shown in Table A1.4, based on Lichfields' experience of similar strategic housing developments and household survey results from across the country.

Table A1.4 Retention Rates (% market share)

	BEW development	Rest of 2km catchment
Comparison Goods	10%	2%
Convenience Goods	40%	5%
Food / beverage	30%	5%

1.31 These market shares exclude on-line expenditure, which has already been deducted from the expenditure projections. The retention of comparison goods expenditure within the BEW development is much lower than for convenience goods shopping, because residents will generally travel further and shop around for comparison goods i.e. they will travel into Bognor Regis, Chichester or further afield to visit larger shopping destinations.

1.32 These market shares are considered viable in terms of the scope to expand existing facilities, the likely scale of a new retail facilities and the amount of expenditure leakage from the local catchment area.

Capacity for retail and food/beverage floorspace

1.33 Adopting the future retention rates shown in Table A1.4, future levels of available expenditure at 2030 are shown in Table A1.5. Projections for 2033 are shown in Table A1.6

Table A1.5 Expenditure retained by the BEW development at 2030 (£ millions)

	BEW development	Rest of 2km catchment	Total
Comparison goods	0.92	0.72	1.64
Convenience goods	2.08	1.02	3.10
Food / beverage	1.05	0.69	1.74

Table A1.6 Expenditure retained by the BEW development at 2033 (£ millions)

	BEW development	Rest of 2km catchment	Total
Comparison goods	1.34	0.78	2.12
Convenience goods	2.83	1.03	3.86
Food / beverage	1.46	0.71	2.17

- 1.34 The expenditure projections have been converted into floorspace estimates adopting an assumed average sales density figure of £10,000 per sq.m net for convenience goods floorspace, £7,000 per sq.m net for comparison goods floorspace and £5,000 per sq.m gross for food/beverage floorspace. These are viable and realistic average turnover density based on Global Data's latest operator company average turnover estimates. Net to gross ratios of 70% for convenience goods and 80% for comparison goods retail have been adopted. The available expenditure projections are converted into gross floorspace estimates in Table A1.7 below.

Table A1.7 Barnham/Eastergate/Westergate floorspace capacity projections (sq.m gross)

	By 2030	By 2033
Comparison goods	294	380
Convenience goods	444	551
Food / beverage	347	433
Total	1,085	1,364

Mix of uses

- 1.35 In addition to these retail and food/beverage uses, the local centre will provide additional space for other non-retail service uses e.g. hairdressers, barbers, beauty salons, estate agents, solicitor/financial services, travel agents etc. Lichfields would normally expect at least 20% of total floorspace would be occupied by these non-retail service uses. The floorspace projections up to 2030 indicate the following levels of floorspace could be provided within the local centre:

- Comparison goods retail = 294 sq.m gross
- Convenience goods retail = 444 sq.m gross
- Food/beverage outlets = 347 sq.m gross
- Other non-retail services = 271 sq.m gross
- Total: = 1,356 sq.m gross**

- 1.36 By 2033, these figures increase as follows:

- Comparison goods retail = 380 sq.m gross
- Convenience goods retail = 551 sq.m gross
- Food/beverage outlets = 433 sq.m gross
- Other non-retail services = 341 sq.m gross
- Total: =1,705 sq.m gross**

- 1.37 The local centre is expected to provide up to 1,250 sq.m gross of Class E and F2 main town centre uses i.e. retail, service, leisure, food/beverage and community uses. Only 1,000 sq.m gross is expected to be occupied by retail, service and food/beverage uses, below the projections shown above (1,356 to 1,705 sq.m gross). Based on the capacity projections to 2033 above, an indicative breakdown of the floorspace proposed is shown in Table A1.8.

Table A1.8 Indicative proposed retail, service and food/beverage floorspace breakdown (sq.m gross)

	Floorspace sq.m gross
Comparison retail	200
Convenience retail	350
Food/beverage outlets	250
Other non-retail services	200
Total	1,000

1.38 The local centre is expected to include a large convenience store (up to the Sunday trading limit – 280 sq.m net or 350 sq.m gross). The comparison goods retail facilities (200 sq.m gross) are likely to include a pharmacist and other shops selling lower order comparison goods purchased on a day-to-day basis e.g. florist, hardware/household goods or opticians. The food/beverage uses (about 200 sq.m gross) could include a pub/restaurant, café/restaurants and/or takeaway. The other services (about 200 sq.m) could include hairdressers, barbers, estate agents or financial services.

1.39 Overall, the local centre are likely to accommodate about 10 shop/service units. The local centre will help to meet the needs of future residents within a reasonable walking distance.

Retail impact assessment

1.40 The floorspace capacity projections above assume most (about two thirds) of the local centre's turnover will be generated by new residents within the BEW development, rather than the local indigenous population. No trade diversion or adverse impact on other existing local centres will be caused by the turnover generated by the new residents within the BEW development. Indeed, the expenditure generated by residents within the BEW development will benefit rather than harm existing designated centres, because not all the new expenditure will be taken by the new local centres. This benefit will help to offset trade attracted from the indigenous population leading to trade diversion from existing shopping destinations.

1.41 In order to test the worst-case level of impact, the assessment assumes the maximum amount of retail and food/beverage floorspace (1,000 sq.m gross) will be developed, fully occupied and trading to its full potential by 2030. This assumes the local centre is completed by 2028, allowing two years post completion to achieve full and settled trading levels. The expected retail and food/beverage turnover of the development at 2030 is £4.80 million, broken down as follows:

- comparison goods retail (200 sq.m gross – 150 sq.m net) = £1.05 million
- convenience goods retail (350 sq.m gross – 250 sq.m net) = £2.50 million
- food/beverage outlets (250 sq.m gross) = £1.25 million

1.42 It should be noted that the turnover levels above, are significantly lower than the resident expenditure (£17.87 million) generated by the BEW development at 2030.

1.43 As a conservative estimate, the impact assessment assumes only 60% of this turnover will be generated from new expenditure generated by the BEW development, and therefore not more than 40% will be diverted trade from the indigenous population, resulting in trade diversion from existing shopping destinations.

1.44 The distribution of trade diversion and impact described below is based on Lichfields' judgments, taking account the localised catchment area of the proposed development, existing shopping patterns, the proximity of existing shopping destinations and the propensity of the proposed facilities to compete with these existing destinations.

Convenience goods impact

- 1.45 The Arun Retail Study Update 2016 estimated the convenience goods turnover of facilities within Arun West was £11.20 million in 2014, or £11.96 million converted to 2019 prices. The pre-development turnover of existing convenience goods facilities in Arun West is estimated to be as follows (at 2019 prices):
- Co-op, Barnham £2.66 million;
 - Other smaller stores/shops in Barnham £1.13 million;
 - Co-op, Yapton £1.85 million;
 - Other smaller stores/shops in Yapton £4.18 million;
 - Local shops Eastergate £0.81 million;
 - Local shops Walberton £0.68 million;
 - Local shops Westergate £0.53 million; and
 - Local shops Woodgate £0.11 million.
- 1.46 The turnover of the convenience goods floorspace proposed in the local centre is £2.5 million, of which not more than £1 million (40%) will be derived from the indigenous population. Not all trade derived from the indigenous population will be diverted from local shopping facilities in Arun West. The Arun Retail Study Update 2016 indicates local shopping facilities within Arun West retain less than 15% of the total residents' expenditure in this area, with most of the expenditure leakage (over 85%) attracted to large stores in Bognor Regis, Littlehampton and Chichester.
- 1.47 Based on existing shopping patterns from the Arun Retail Study Update 2016 not more than 20% of the local centre's turnover derived from the indigenous population would be diverted from local shops in Arun West i.e. £0.2 million. This is the maximum likely trade diversion from existing facilities within Arun West.
- 1.48 The average impact on existing convenience goods facilities (with a pre-development turnover of £11.96 million) is only -1.7%. This low level of trade diversion will be more than off-set by additional expenditure generated by the BEW development at 2030. Convenience goods expenditure generated by 2,300 residents at 2030 is £5.20 million. The proposed local centre is expected to retain up to 40% of this expenditure (£2.08 million) and the remaining £3.12 million will be available for existing shopping facilities. At least 10% of this remaining expenditure (£0.31 million) should be attracted to existing local shopping in Arun West, which is significantly higher than the trade diversion estimated above (£0.2 million).
- 1.49 Overall, the impact on existing convenience shopping facilities in Arun West will be positive rather than harmful.

Comparison goods impact

- 1.50 The Arun Retail Study Update 2016 estimated the comparison goods turnover of all facilities within Arun District was £155.04 million in 2014, projected to increase to £206.61 million by 2021 or £212.15 million converted to 2019 prices. Only 0.8% of this turnover was attracted to comparison facilities outside the main towns (i.e. Arundel, Bognor Regis, Littlehampton, Rustington and Ferring), that is £1.7 million at 2021.
- 1.51 The turnover of the comparison goods floorspace proposed in the local centre is £1.05 million, of which not more than £0.42 million (40%) will be derived from the indigenous population. Most of this trade will be diverted from the main towns in Arun District and Chichester. Based

on existing shopping patterns from the Arun Retail Study Update 2016 not more than 10% of the local centre's turnover derived from the indigenous population would be diverted from local shops outside then main centres in Arun i.e. £0.04 million. This is the maximum likely trade diversion from existing local shops outside then main centres in Arun.

- 1.52 The average impact on existing comparison goods shops outside the main centres in Arun (with a pre-development turnover of £1.7 million) is only -2.4%. This trade diversion will be more than offset by future population and expenditure growth. Impact on the comparison goods shops in the local area is not significant.
- 1.53 These low levels of trade diversion will also be more than off-set by additional expenditure generated by the BEW development at 2030. Comparison goods expenditure generated by 2,300 residents at 2030 is £9.19 million. The proposed local centre is expected to retain not more than 10% of this expenditure (£0.92 million) and the remaining £8.27 million will be available for existing shopping facilities. Even if only 1% of this remaining expenditure (£0.08 million) is attracted to existing local shopping facilities outside the main centres in Arun then this additional trade will offset the trade diversion estimated above (£0.04 million).
- 1.54 Overall, the impact on existing comparison goods shopping facilities in the local area will be positive rather than harmful.

Food and beverage impact

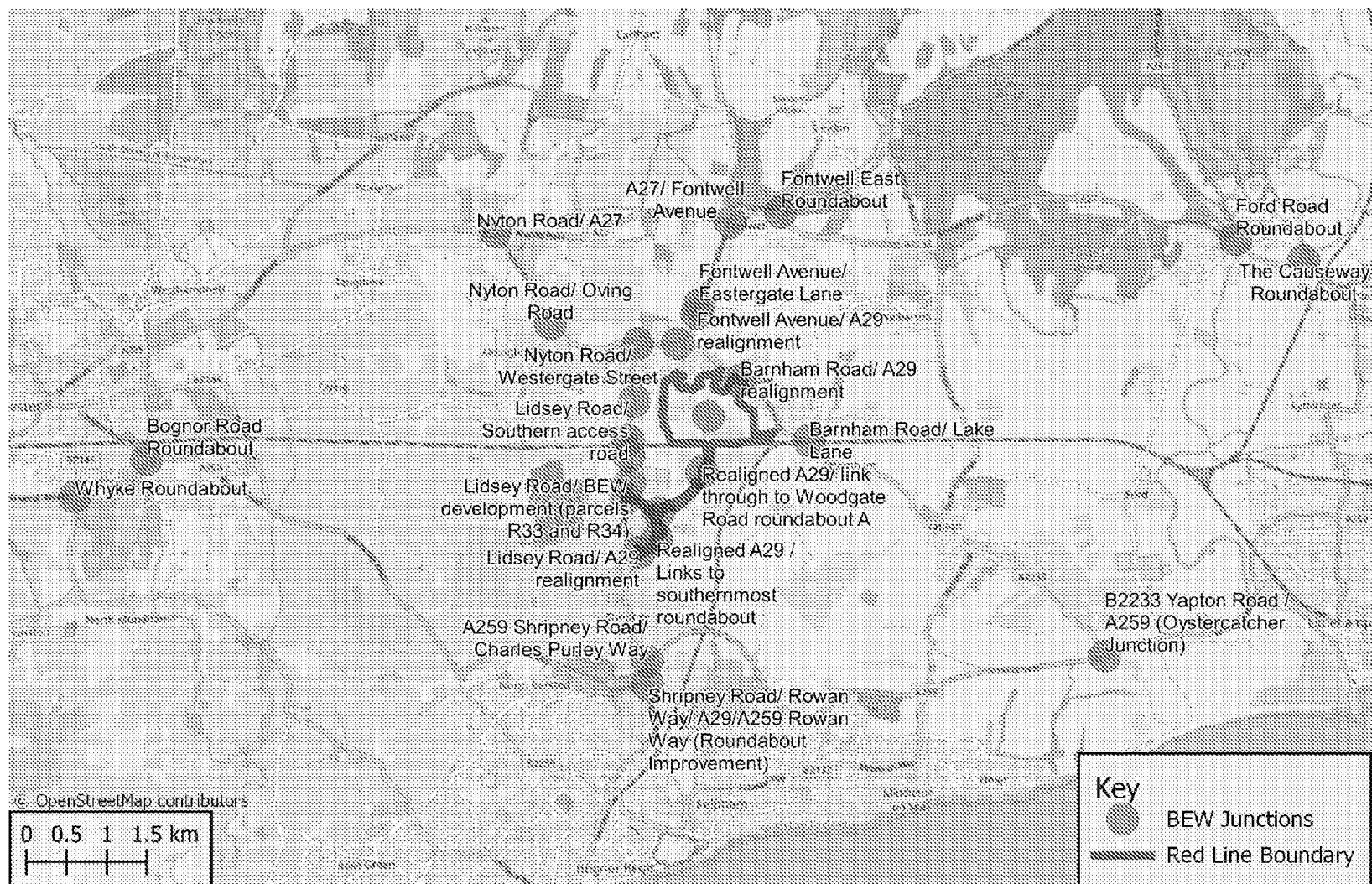
- 1.55 The Arun Retail Study Update 2016 did not estimate the food/beverage turnover of facilities within Bognor Regis. However, the Arun Retail Study to 2013 included a household telephone survey that asked respondents where they normally go for an evening out such as restaurants and pubs. Arun West's market share of food and beverage trips in the study area was 0.9%.
- 1.56 The Arun study area's population was about 230,000 in 2021. This population would generate food/beverage expenditure of at least £230 million, based on an average of £1,000 per person per annum. If Arun West's market share of this expenditure is 0.9% then the study area derived turnover of facilities in Arun West is £2.1 million.
- 1.57 The turnover of the food/beverage floorspace proposed in the local centre is £1.25 million, of which not more than £0.5 million (40%) will be derived from the indigenous population. Most of this trade will be diverted from the main towns in Arun District and Chichester. Based on existing shopping patterns from the Arun Retail Study Update 2016 not more than 10% of the local centre's turnover derived from the indigenous population would be diverted from local shops outside then main centres in Arun i.e. £0.05 million. This is the maximum likely trade diversion from existing local food/beverage shops in Arun West.
- 1.58 The average impact on existing food/beverage facilities (with a pre-development turnover of over £2.1 million) is about -2.4%. This trade diversion will be more than offset by future population and expenditure growth.
- 1.59 Furthermore, this level of trade diversion will more than off-set by additional expenditure generated by the BEW development at 2030. Food/beverage expenditure generated by 2,300 residents at 2030 is £3.49 million. The proposed local centres are expected to retain not more than 30% of this expenditure (£1.05 million) and the remaining £2.44 million will be available for existing food/beverage facilities.
- 1.60 Even if only 2% of this remaining expenditure (£0.05 million) is attracted to existing local facilities in Arun West then this additional trade will offset the trade diversion estimated above (£0.05 million).

- 1.61 Overall, the impact on existing food/beverage facilities in Arun West will also be positive rather than harmful.

Summary

- 1.62 The BEW development will include a mix of uses providing key community infrastructure that serves most day-to-day needs, reducing the need to travel. The proposed local centre will create a focal point. The Arun Local Plan clearly envisages that BEW will be served by new shops and services. The provision of a new local centre is consistent with adopted up-to-date policy.
- 1.63 The Barnham/Eastergate/Westgate strategic housing allocation SD5 refers to the provision of a Community Hub. The scale and mix of uses are not specified in SD5 and there is no policy requirement to prepare a retail impact assessment or sequential site analysis. However, in order to assist the Council's consideration of this planning application an analysis has been prepared to assess the potential implications of the proposed local centre.
- 1.64 The floorspace capacity projections confirm there is scope for retail, food/beverage and non-retail services for at least 1,000 sq.m gross. The proposed local centre will predominantly serve new residents at BEW. The expected turnover levels for the new centre are significantly lower than the resident expenditure generated by development at BEW, and therefore there will be a net benefit for existing designated centres.
- 1.65 The impact assessment for convenience and comparison goods retail and food/beverage uses, assumes as a worst case that 40% of the retail and food/beverage turnover will come from the indigenous population, which will lead to trade diversion from existing facilities. Most of the trade diversion is expected to come from existing shopping destinations in Bognor Regis, Littlehampton and Chichester. A small proportion will be diverted from local facilities in Arun West. In all cases the levels of trade diversion and proportional impact will be more than offset by future population/expenditure growth, notwithstanding the additional expenditure generated by the BEW development.
- 1.66 The scale of commercial uses proposed is not expected to have any adverse impact on designated centres or local facilities.

Appendix 2 Map showing location of junctions considered in Transport Assessment



Source: Transport Assessment, Pell Frischmann

Birmingham

Bristol

Cardiff

Edinburgh

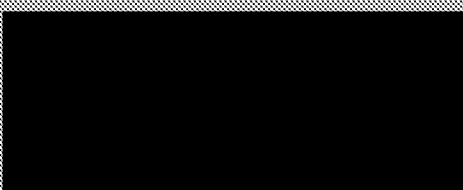
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