

Barnham, Eastergate, Westergate: Parcel SC1

Supplementary Planning Statement

The Southern Consortium

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A.6

Introduction

- 1.1 This Supplementary Planning Statement has been prepared on behalf of the Southern Consortium (comprising C.C. Projects, Ashmarden Limited and Hanbury (PM) Limited) in relation to the outline planning application (BN/11/22/OUT) at Barnham, Eastergate, Westergate ("BEW") Parcel SC1.
- 1.2 The outline application was originally submitted in January 2022 and 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.
- 1.3 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 BEW Framework Masterplan demonstrated that an increased housing number of 4,300 homes could be accommodated on site and was endorsed by the Council in November 2020. 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 facilities).
- 1.4 Since the application was submitted, detailed discussions have been ongoing with officers at Arun, key statutory consultees such as West Sussex County Council (WSCC) Highways and Education officers, and the Environment Agency (EA). As a result of these discussions, a number of minor amendments are proposed to the scheme as submitted. This Supplementary Planning Statement describes those changes, assesses them against relevant planning policy and also provides further supplementary information on the proposals, including the applicant's response to issues raised through consultation to date. This addendum document should be read alongside the original Planning Statement dated January 2022.
- 1.5 A full schedule of document substitutions and additional information is contained within the covering letter which includes a full schedule of drawings. In broad terms, this submission addresses the following amendments:
- 1 Amendments to the detailed design of the A29 to address feedback from WSCC Highways; and
 - 2 Inclusion of a flood compensation scheme to address feedback from the EA, as a result of which a minor amendment to the application site boundary is proposed.
- 1.6 These amendments are described in detail in section 2.0.

- 1.7 The Appendices to this report set out a response to all statutory consultee comments (Appendix 1), public comments (Appendix 2) and Parish Council comments (Appendix 3) received to date on the application. This is an update to the response table submitted to the Council on 15 July 2022 and available on the Council's website.

2.0 Scheme Amendments

A29 Detailed Design

2.1 Following detailed discussions with WSCC since the submission of the application, there have been a number of updates to the detailed design of the A29 (details of which are set out in full as part of this submission). The main changes are set out below as requested and agreed by WSCC:

- 1 Updated proposals to align with the Barnham Road Roundabout being delivered by WSCC;
- 2 Narrowing of road carriageway to 6.75m and reducing to 6.5m at signalised crossings;
- 3 Independent uncontrolled crossings to include 3m wide central island;
- 4 Cycleways changed to two way both sides of the carriageway with width increased to 3m each side of the road in line with LTN 1/20 ;
- 5 Cycleway provision onto the carriageway introduced at Barnham Roundabout and Lidsey Road Roundabout;
- 6 On both the bridge over the railway line and the bridge over the Lidsey Rife, verge increased to allow for potential highway widening in the future to 7.3m;
- 7 Two lane exits from roundabouts reduced to single lane exits;
- 8 Removal of left-in, left-out ('li-lo') side road junctions and replacement with ghost island junctions removing central barrier;
- 9 Side road priority changed to cycle priority (in accordance with LTN 1/20);
- 10 Alterations to 'Green Line' on the northern side of Hanbury Link roundabout to clarify that the scheme does not include privately owned land;
- 11 Changes to the location of controlled and uncontrolled crossings, especially around approaches to intermediate roundabouts;
- 12 Proposed Southern Water access enlarged in line with Southern Water's proposed improvements to existing facilities;
- 13 Changes to proposed works on Lidsey Road including to reflect the agreed 40mph design speed.

2.2 These amendments have been agreed with and received technical approval from WSCC including Departures from Standards approval. Relevant plans and documents including landscaping drawings and the DAS/Design Principles document have been updated to accommodate these changes.

Flood Compensation Scheme

2.3 Following detailed discussions with the EA during the determination period, the application plans have been amended to include an area of floodplain compensation where the Lidsey Rife floodplain is impacted by the proposed A29 crossing. It is estimated that 2,643m³ of compensation would be displaced as a result of the bridge approach embankments being partially located within the floodplain. The compensation feasibility

drawing at Appendix 6 of the updated FRA (ES Addendum (November 2023) Appendix 6 – Updated Flood Risk Assessment) shows that 2,768m³ of compensation could be provided on the western banks of the Lidsey Rife i.e. a net increase in floodplain volume, resulting in an improvement to the existing situation. A small amendment to the application site red line boundary has been made to accommodate this. This additional site area is included within the Applicant's wider land holding. This approach allows the flood compensation scheme to be included within the proposals as part and parcel of the scheme, and has been discussed and agreed with ADC. Full details of the floodplain compensation are set out in the updated FRA (see section 5.8).

Planning Assessment

- 2.4 The amendments to the scheme sought as part of these revisions to the BEW Parcel SC1 application are minor and do not affect the overall nature of the application. They are directly in response to feedback from technical consultees, and the applicant has sought to use the consultation feedback to improve the scheme as submitted.
- 2.5 The key impacts of the overall scheme remain as previously assessed and the conclusions of the Planning Statement dated January 2022 remain unchanged; that the proposed development accords with all relevant local and national planning policy, delivers significant public benefits and represents sustainable development in social, economic and environmental terms. 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.
- 2.6 In December 2023 an updated version of the National Planning Policy Framework (NPPF) was published. It is not considered that any of the amendments have a material effect on the assessment of the scheme in planning terms. As set out in the January 2022 Planning Statement, the proposed development is allocated in the Local Plan and is in accordance with local and national planning policy.

3.0 Conclusion

- 3.1 The proposed amendments are minor and seek to improve the proposed development in response to consultee feedback. The key impacts of the scheme remain the same as previously assessed and the conclusions of the original Planning Statement remain relevant; the proposals continue to be in accordance with the development plan as a whole, and approval should be granted.
- 3.2 The Appendices set out detailed responses to all consultee and public comments received in response to this application.

Appendix 1: Consultee Comments and Responses

Table 1 below sets out a summary of all statutory consultee comments received to date and the applicant's response to these.

Table 1 Applicant response to consultee comments

Consultee	Date of Comments	Summary of Comments	Applicant Response
Sussex Police	16.02.2022	No objection, detailed guidance provided in relation to Secured by Design.	Guidance noted for detailed design stage.
CDC Ecology	28.02.2022	No comment.	No response required.
Environmental Health	01.03.2022	No objection, a number of conditions proposed.	The proposed conditions are acceptable subject to being worded appropriately to allow a phased discharge.
Natural England	01.03.2022 14.03.2022	No objection subject to conditions to safeguard soil resources. The comments also include advice in relation to the loss of the Best and Most Versatile Agricultural Land.	It is expected that measures in relation to soil management would be secured as part of phase specific Construction Environmental Management Plans (CEMPs). In relation to the loss of agricultural land, Local Plan Policy SODM1 states that unless designated by the Local 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 unless certain provisions are met. This is reiterated by the BE NP Policy ES14. The Site currently includes Grade 1, 2 and 3 agricultural land. The Site forms part of the BEW allocation designated within the Arun Local Plan and is identified in the Aldingbourne and Barnham and Eastergate Neighbourhood Plans as within the Built Up Area Boundary. The principle of the loss of agricultural land in this location is therefore established.
WSCC (PROW)	02.03.2022	A number of queries raised in relation to public rights of way including: - Whether the new pedestrian/cycle routes through the site are to become Public Rights of Way - Queries on footpath FP296 and its route	A meeting was held on 29th March 2022 with WSCC to discuss the comments and support for the signal controlled crossing at the 'Green Link' across the A29 realignment was welcomed. In terms of the questions raised:

Consultee	Date of Comments	Summary of Comments	Applicant Response
		- Requests for a shared footway between FP296 and Church Lane - Whether the intention is to upgrade FP 321 to a bridleway or confer permissive cycle rights -FP323 - planning permission does not automatically grant diversion, needs to be granted by LPA under section 257.	FP296: The proposed connection will extend to the site boundary to connect with the existing PROW at the site boundary. FP321: As advised by the WSCC PROW officer, it is proposed that the 'Green Link' on this route (within the site boundary) is upgraded to a E Class highway to allow use by both pedestrians and cyclists. FP323: Regarding whether this is to be a PROW: The diverted route is intended to be used by both pedestrians and cyclists and therefore following advice from the PROW officer, it is proposed that this diverted route is a Class E highway. The realigned route is submitted in outline and so the width is not yet fixed, however, JTP and Pell Frischmann have reviewed the available width and confirm that a segregated footway and cycle link can be accommodated following the route of the proposed realignment. A section and layout sketch (ref. 00605B_SK71 and 00605B_SK_070 respectively) have been prepared to demonstrate this and submitted to Arun on 15 July 2022. The relevant approval for the diversion of the PROW will be pursued with ADC. Off-site cycle links: WSCC requested that existing routes beyond the site boundary are upgraded, namely the FP296 and FP321. We note that FP321 forms part of the 'Westergate Link Cycle Scheme' as referred to in Local Plan Policy H SP2C SD5 and, as recognised by the WSCC PROW officer, FP296 is expected to form part of the South Downs to Coast cycle route. The proposed development will deliver the connections on site within the land the applicants' control. It is noted that the Infrastructure Delivery Plan (IDP) seeks financial contributions from applications within the allocation towards the delivery of these wider schemes. It is therefore expected that ADC/WSCC will be responsible for the delivery of these schemes.
WSCC (Education)	04.03.2022 12.07.2022	Objection to the application on the basis of secondary school provision, namely that a site has not been allocated or secured for the provision of a 10FE	The proposed financial contributions towards a new 10 form entry secondary school are in line with Local Plan Policy INF SP2 part (c), which states that all development that generates a need for

Consultee	Date of Comments	Summary of Comments	Applicant Response
		secondary school to accommodate the development on site allocations within the Local Plan as outlined in Local Plan Policy INF SP2.	secondary school places where there is an identified deficit shall make an appropriate financial contribution as identified in the IDP. Separate discussions are ongoing with ADC and WSCC regarding the detail of the proposed financial contribution which will be secured through the S106 agreement. Separately, it is understood that ADC and WSCC are progressing with securing a secondary school site.
ADC Archaeology	16.03.2022	No objection subject to an appropriate condition requiring that an investigation to identify significant deposits that might be present (and to implement appropriate measures for their preservation) takes place in accordance with an agreed Written Scheme of Investigation.	The proposed condition is acceptable subject to being worded appropriately to allow a phased discharge.
ADC Green Space	17.03.2022	The ES appears comprehensive and sets out the findings of the EIA. The EIA has considered the requirement to assess landscape and views which in principle have highlighted the effects on visual receptors from various viewpoints. Further detailed analysis regarding detailed landscape design and consideration of existing and formed Green Infrastructure (GI) will be paramount through the evolving development applications.	No response required.
WSCC (Minerals and Waste)	23.03.2022	WSCC Minerals and Waste confirms that the site partly falls into a mineral safeguarding area for sharp sand and gravel. The view of WSCC Minerals and Waste is that the sterilisation of the mineral resource would be regrettable but recognises that policy requires the determining authority to weigh the need for development against the safeguarded resource.	In this respect, Policy M9 states that proposals for non-mineral development within 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. As set out in the Minerals Resource Assessment prepared by Pell Frischmann, there are geotechnical constraints which result in prior mineral extraction being economically unfeasible. These comprise the high groundwater affecting excavation works, that extraction would require the replacement infill of material beneath the water table and also the negative impact on residential amenity of

Consultee	Date of Comments	Summary of Comments	Applicant Response
			extraction in this location. The substantial public benefits of the scheme including the delivery of 1,250 new homes to contribute to Arun's housing need and significant infrastructure provision (notably the A29 realignment), outweigh the safeguarding of the mineral resource in compliance with Local Plan Policy M9. Please refer to paragraphs 6.171-6.172 of the Planning Statement, and the submitted Minerals Resource Assessment, for more information on this matter. A full summary of the substantial planning and public benefits arising from the scheme that weigh heavily against safeguarding of the mineral resource are outlined at paragraph 8.4 of the Planning Statement.
ADC Drainage	22.03.2022	No objection subject to proposed conditions.	The proposed conditions are acceptable subject to being worded appropriately to allow a phased discharge.
WSCC (Fire and Rescue)	23.03.2022	No objection subject to proposed condition.	The proposed condition is acceptable subject to being worded appropriately to allow a phased discharge.
WSCC (S106)	25.03.2022 22.09.2022 24.11.2022 21.06.2023	Multiple responses received setting out the contributions to be secured in the S106 agreement.	Discussions are ongoing separately regarding S106 obligations and viability.
National Highways (NH)	25.03.2022 14.04.2022 11.07.2022 16.12.2022 06.04.2023 06.07.2023 05.10.2023	A number of comments have been issued by NH which requested further information required to assess the scheme's impact on the Strategic Road Network. Following detailed discussions between NH and the applicant's transport consultants, Pell Frischmann, the latest response from NH confirms that NH has no objection to the proposal subject to conditions.	It is the applicant's view that the proposed conditions are not appropriate to be applied to the BEW application. According to the September 2022 Apportionment Study table, BEW is not required to contribute to either of these junctions. Therefore, the applicant does not consider that the imposition of such planning conditions is reasonable in relation to BEW.
Environment Agency (EA)	28.03.2022 28.11.2022 20.07.2023	Objection in relation to the following matters: - The way that climate change is taken into account in the submitted FRA - Request that floodplain compensation is included in relation to the Lidsey Rife bridge	The applicant has responded to each of the EA's comments and has previously reached agreement on a number of matters including the way that the impacts of climate change are assessed in the FRA. The proposed flood compensation scheme addresses the EA's outstanding objection and all matters should now be resolved. Further information is provided in the updated FRA.

Consultee	Date of Comments	Summary of Comments	Applicant Response
Sport England	01.04.2022 11.04.2022	Support the application subject to recommendations in respect of playing fields and indoor sports facilities and a request for a financial contribution.	Recommendations in relation to detailed design have been noted by the applicant. Discussions are ongoing separately regarding S106 obligations and viability.
WSCC (Highways)	07.04.2022 12.05.2022 24.06.2022 19.07.2022	A detailed summary of discussion with WSCC is set out in the Transport Chapter of the enclosed ES Addendum. Pell Frischmann have been engaged in detailed discussions with WSCC throughout the determination period and have responded in detail to all WSCC comments. WSCC has confirmed in discussions with the Applicant and ADC that the transport modelling is acceptable. The proposed amendments to the detailed design of the A29 are directly in response to WSCC Highways comments and WSCC has confirmed that these are acceptable through technical approval; a Road Safety Audit has also been carried out and Departures from Standards were confirmed to be acceptable on 14 th September 2023.	
Network Rail	17.05.2022 18.04.2023	Request further information in relation to: level crossings, Barnham Railway Station, Asset Protection and Shared Value.	A number of meetings have been held with Network Rail, which include discussions regarding asset protection and shared value which are commercial rather than planning matters. Pedestrian and cycle connection to Barnham Station: At the meeting on 7 July 2022, Pell Frischmann explained the rationale informing the proposed connection via Gospond Road and the land ownership constraints that restrict the ability of the applicant to commit to the delivery of a connection directly to the station. On this basis, Network Rail verbally confirmed that the proposed connection is acceptable. West Barnham and Birch footpath level crossings: Network Rail identified the need for mitigation to the crossings as a result of the potential additional use arising from the development. It is noted that the underpasses beneath the railway are proposed to be upgraded in the Framework Masterplan and it is proposed that these measures will be brought forward as part of applications for the relevant land parcels south of the railway, when there is development that will attract residents from north to south. In the meantime, it is noted that the footpaths are due to be upgraded in connection with the Gleesons development, south of Barnham Station (ref. APP/C3810/W/21/3273087).

Consultee	Date of Comments	Summary of Comments	Applicant Response
			New Barn User Worked Crossing: It is expected that the need for the crossing will fall away following development of the farmer's land in the north. Canal footpath: As recognised by Network Rail, the footpath is not directly impacted by the proposed development as no development surrounding or connecting to this route is proposed. It is intended that matters regarding the canal route and provision of a pedestrian and cycle connection along the route within the site boundary would be considered as part of application for the relevant land parcel south of the railway line. Barnham Railway station improvements: Network Rail requests a contribution towards additional cycle parking at the station, which the Southern Consortium is agreeable to in principle. This is being discussed with ADC and Network Rail as part of wider ongoing S106 discussions.
WSCC (LLFA)	30.05.2022	No objection.	No response required.
Place Services Ecology	26.08.2022	No objection subject to conditions.	The proposed conditions are acceptable subject to being worded appropriately to allow a phased discharge.
Southern Water	24.03.2022 03.10.2022	No objection subject to condition regarding sewerage network reinforcement: 'Occupation of the development is to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development'.	The condition as worded is not considered acceptable and is open to interpretation. This should be discussed in due course.
NHS Coastal West Sussex	09.12.2022 13.12.2022	No objection subject to a request for a financial contribution.	Discussions are ongoing separately regarding S106 obligations and viability.

Appendix 2 Public Comments and Responses

Table 2 below sets out a summary of public comments received on the application and the applicant's response to these. At the time of writing, 22 comments have been received from members of the public/local businesses.

Table 2 Response to Public Comments

Issue Raised	Applicant Response
Flood risk	The drainage strategy promotes a sustainable approach to managing rainfall runoff from the development. A comprehensive surface water drainage strategy has been developed to manage the increased surface water runoff from the development in a safe manner, so that runoff is contained within the site, and any outlet into the watercourses is at a controlled rate less than the current natural runoff. This therefore prevents flooding arising as a result of the development both on the site, and further downstream and offsite. The robust strategy has full regard to the potential impacts of climate change as well as other ecological and hydrological considerations, and we consider it to be acceptable in technical terms. Discussions remain ongoing with the Environment Agency to obtain their confirmation that the proposed drainage strategy is acceptable.
No provision for medical services/doctors surgery.	The applicant has engaged in discussions with ADC and the NHS Coastal West Sussex Clinical Commissioning Group (CCG) on the primary health care requirements arising from the development, including GP surgeries. We understand that the CCG's current preference is for expansion of existing off-site facilities, namely the Croft Practice in Barnham. Financial contributions for the CCG towards facilities to meet the needs arising from the new development will be agreed as part of the Section 106 legal agreement for this and other applications.
Lack of capacity at local schools.	The application includes land for a new primary school, with nursery and SEND provision which will serve the needs of the proposed development and create capacity for the wider allocation in line with the policy requirements and ongoing discussions with the WSCC Education Team. ADC is proposing to build a new secondary school at Ford to serve the site allocations within the adopted Local Plan, which this application will make a financial contribution towards, as per policy requirements. Similarly a financial contribution will be made towards sixth form provision in line with the consultation response from WSCC.
Employment provision for future residents.	The facilities within the Neighbourhood Centre will be employment generating and further detail on this is provided in the socio-economic chapter of the Environmental Statement. The proximity of Barnham station to the application site and the enhanced connectivity forming part of the proposal, will support new residents to access workplaces in the local area. In this respect, the Local Plan allocates circa 75 hectares for employment land across the District to support strategic economic growth and job creation for the District including as a result of the site allocations within the Local Plan. Future residents will include those relocating from within the District and West Sussex who are already employed such that a new job requirement will not arise.
Traffic and highway safety. East-west access road linking to Gospond Road is unsuitable – additional traffic cannot be	As required by the National Planning Policy Framework (2023) and local planning policy a Transport Assessment has been prepared and is appended to the Environmental Statement. The comprehensive assessment has been undertaken by 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. Discussions are ongoing with National Highways and WSCC Highways regarding the details of the transport elements.

Issue Raised	Applicant Response
sustained and consideration is needed of the privacy of existing residents.	The East-West link road is a requirement of the strategic allocation as set out in Policy HSP2c SD5 of the Local Plan. It provides a connection towards Barnham Station and will comprise a loop road at its eastern end to provide a drop off bay and car parking for the station. Users would then access the station on foot or by bike via a new pedestrian and cycle link that is proposed to connect via Gospond Road. A connection for cars will not be provided onto Gospond Road. The detailed design of the pedestrian and cycle route will be progressed as part of the relevant Reserved Matters submission and will ensure that the route is safe whilst also ensuring that it protects the privacy of existing residents on Gospond Road.
Impact on St George's Church	The Grade II* Listed St George's Church has been taken into account in the design of the scheme. Open views towards the south from the Church would be retained through the positioning of the Linear Park and the land for the cricket pitch which presents a low impact recreational use. The closest built development proposed is over 125m to the east of the Church and so open views from the Church would largely be retained. A full assessment is provided in the Built Heritage Chapter in the ES.
Development on green fields detrimental to environment and loss of agricultural land.	The site is allocated for development in the ADC Local Plan which was adopted in 2018. As part of the Local Plan process the Council assessed the impacts of the allocation on the countryside and environment in detail, and this was independently examined by a Planning Inspector. The principle of development in this location and the loss of agricultural land was assessed during the examination of the Local Plan and considered acceptable.
Coalescence/urbanisation of villages will affect quality of life.	The design principle around growth that underpins the proposed development proposes new, distinct clusters of development in a landscape setting. 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. As part of this design principle, the scheme parameters incorporate the Lidsey Rife, Linear Park and Green Ring which will create a buffer between the urban extensions and the separate new settlement. This reflects the layout of the Council endorsed Framework Masterplan.
The roundabout next to Polson Dairy is drawn over a protected hedgerow which has ecological value	An assessment of ecological impacts is provided in the Environmental Statement Chapter F which acknowledges the loss of the hedgerow/tree line at the location of the proposed roundabout to tie in with the existing A29 and assesses the potential impact on biodiversity. It is anticipated that the Proposed Scheme will deliver a clear and demonstrable net gain in biodiversity across the site.
Concerns about the long-term business plan for the community hub	Further details in relation to the community hub will be provided at Reserved Matters stage. The scale of the neighbourhood centre has been informed by a consideration of market demand to ensure that it is viable in the long term.
Affordability of houses for local people.	The maximum viable level of affordable housing, as defined by planning policy, will be secured as part of the application. 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. A Viability Assessment has been submitted alongside the planning application and discussions are ongoing regarding the proposed level of affordable housing to be included. 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.

Appendix 3 Response to Parish Councils and Five Village Society Comments

Table 3 below sets out the applicant's response to comments received from Barnham and Eastergate Parish Council, Walberton Parish Council, Aldingbourne Parish Council and the Five Village Society. It is also noted that Bognor Regis Town Council has noted concerns regarding highways impact and has advised the Council Members to satisfy themselves that the development is acceptable in transport terms.

A meeting was held with Barnham and Eastergate Parish Council to discuss their response on 20th March 2022 during, which it was recognised that its objections largely related to wider strategic planning matters and a follow up response was provided. Since this date engagement has continued through BEW Advisory Group meetings, the most recent of which was held on 7 July 2023.

Table 3

Matter Raised	Applicant Response
The A29 should be delivered before housing and concern that there is no guarantee that the A29 will be delivered.	The A29 is proposed to be developer funded as required in the Local Plan and included in the accompanying Infrastructure Delivery Plan. Proportionate contributions will be secured by ADC towards the costs of the A29 realignment via the Section 106 agreements from all planning applications within the site allocation. With respect to the current application, the section of the A29 north of the railway line will be delivered early in the construction programme to provide access to the site and proposed primary school plot. The submitted highways modelling demonstrates that subject to the delivery of the WSCC Phase of the A29 realignment and the off-site junction improvements, the road network can accommodate the proposed development (alongside the other land parcels north of the railway line) without the provision of the bridge and southern tie-in to the existing A29 south of the railway line. The realignment south of the railway is therefore not required to deliver the proposed development and as such the application is acceptable in highways terms without the delivery of the bridge and road south of the railway. This has been confirmed by WSCC. However, it is included in the application to provide greater certainty over the design, location and deliverability of the route in full. The application seeks detailed approval for the road design and this will expedite delivery of the southern section over the railway when it comes forward. The Southern Consortium continues to work with ADC to explore options for third party funding to facilitate the delivery of the full length of the road as early as possible. This would expedite delivery of the wider site allocation by allowing development to also come forward from the south.
Increase of heavy lorry traffic during construction.	The impact of the construction of the development on local residents has been considered in the submitted Environmental Statement. This concludes that during construction there will be minor adverse impacts on the local highways network and in relation to noise and vibration, for local residents for a temporary period. Construction vehicles will use the new WSCC phase of the

Matter Raised	Applicant Response
	A29 realignment from Fontwell Avenue to Barnham Road to access the site in turn avoiding construction vehicles passing through the villages.
Concerns that climate change and sustainable heating sources have not been considered.	Climate change and resilience is considered at Chapter M of the Environmental Statement, and also in Chapter K in relation to flooding which is supported by a drainage strategy which has had full regard to the potential impacts of climate change as well as other ecological and hydrological considerations. A Sustainability Strategy forms part of the planning application and identifies a number of measures that will be considered during the Reserved Matters process. Given that a long construction period is anticipated, it is appropriate that the sustainability strategy remains flexible so that it can reflect the latest guidance and technology at the time of delivery.
Water supply issues. The planning application should be water neutral.	Concerns have been raised that groundwater abstraction within the Sussex North Water Supply Zone may be harming biodiversity within internationally designated sites. Sites within this zone need to demonstrate water neutrality. The BEW site does not fall within this zone and it is not a planning requirement to demonstrate water neutrality. Nevertheless, the Sustainability Strategy includes measures to minimise the consumption of potable water.
Infrastructure provision is considered inadequate, such as schools, drainage, sewerage, electrical supply and clarification is sought on how these will relate to existing facilities	The application includes necessary infrastructure to support the proposed development. The application includes land for a new primary school, with nursery and SEND provision which will serve the needs of the proposed development and create capacity for the wider allocation. ADC is proposing to build a new secondary school at Ford, which this application will make a proportionate financial contribution towards, as per local policy requirements. In relation to sewerage, Southern Water is currently in the process of identifying strategic improvements that are needed to its wastewater treatment works to increase the capacity to receive foul water flow. Discussions remain ongoing with Southern Water and further detail of this is provided in the ES Water Environment and Drainage Chapter. The approach to drainage is set out in the drainage strategy and in line with policy will not increase the flood risk to surrounding areas. With respect to electricity supply, the sustainability strategy includes an energy strategy that will inform detailed energy strategies at Reserved Matters stage which will include consideration of connection to the electricity supply.
A different sports pitch should be included rather than a cricket pitch. Flood lights are not appropriate.	The location of the proposed cricket pitch is in the setting of the Grade II* listed St George's Church and as such it was considered that the cricket pitch would present a low intensity use that could be acceptable in this context. Consideration has been given to the use of the space for other sports facilities such as football pitches, however due to the need for floodlights to be provided which as recognised by the Parish Council would not be appropriate, this option has been discounted and feedback from ADC officers has identified a need to continue to include land for a cricket pitch in the submission. A larger sports hub will be provided on land parcels south of the railway line which will include sports pitches for other sports, in full accordance with the allocation.
Lack of integration with the existing villages and local identity.	The design rationale for the proposed development has drawn upon the Site analysis and appraisal of the existing and historic features of the Site and its setting alongside technical assessments.

Matter Raised	Applicant Response
	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 being distinct place in its own right. This responds to the guidance from ADC in the High Level Design Principles for sensitive urban extensions where the allocation connects to the existing villages and a distinct new settlement with its own identity within the rest of the allocation. This has informed the character area design principles. 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.
No public bus service.	A bus service is expected to be provided along the realigned A29 and this has been agreed in discussions with Stagecoach. Financial contributions will be secured through the S106 agreement. Further detail is provided in the Transport Assessment submitted as part of the application.
Car ownership will be essential.	An extensive network of pedestrian and cycle links are proposed as part of the development amounting to 12km of routes to encourage and promote an uplift in trips by active modes. Please refer to page 46 of the Planning Statement which provides a summary of key routes, including the East-West Link Road, the 'Green Link' around the northern boundary, a 4km circular walking and cycling route and a direct pedestrian and cycle link via Gospond Road to improve connectivity towards the station. 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.

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