



Land South of Barnham Station – BN/142/20/OUT

At a meeting of the Barnham and Eastergate Parish Council's Planning & Environment Committee held on 8th December 2020 the Committee resolved to submit an objection to the above application and that the final response would be prepared and agreed via an email exchange. The main planning objections to this application are as follows:

- The site was not allocated in the made Barnham and Eastergate Neighbourhood Plan (BENP) nor is it allocated in the emerging BENP, currently out for Reg14 consultation.
- The housing numbers are not required to meet the BENP housing targets, which are in excess of the targets set by Arun District Council Local Plan Policy H SP1. The allocation set was 75 in addition to the houses in SD5. The emerging Neighbourhood Plan has identified 3 sites across the Parish that will bring forward 110 additional houses.
- The Parish is already bearing more than its fair share of the development needs of Arun. The Barnham and Eastergate Parish already has 15% of Arun's proposed housing development with only 3% of its total population.
- The site of the proposed development currently forms an important green gap between the emerging SD5 Strategic Allocation and the existing community. The site also falls within a Green Infrastructure Corridor (GIC) identified on the ADC Local Plan Green Infrastructure Map and relates to Policy G1 SP1.

Policy H SP2c of the ADC Local Plan relating to SD5 states:

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.

- The site is outside the built-up area boundary.
- The site falls within the proposed Area of Special Character that has been identified for designation in the emerging BENP - Policy ES7 Conserving and enhancing local heritage assets refers - as it meets the criteria set out in the supporting text to policy HER DM4 of the ADC Local Plan.
- The site is currently used for equestrian business purposes. The emerging BENP contains a new Policy EE8 Support and retain Equine businesses - Support will be given to retaining existing equine businesses. Redevelopment or change of use of land or buildings currently in equine use will not be supported, unless it can be shown that the existing use is no longer economically viable. Typically this would mean that the site has been marketed at a reasonable price for at least a year for that and any other suitable employment or service trade uses and no interest in acquisition has been expressed. Expansion of an existing use will be supported.
- The Proposed access road through the existing cul-de-sac of Marshall Close onto Church Lane and the onto the B2233 is total unacceptable. The Parish Council has already highlighted to West Sussex Councillors its concerns on Highway grounds as follows:
 - (a) Traffic flows along the narrow, and bridged, Yapton road are set to increase considerably due to the new high-density housing developments now taking place on the south side of the road or the overall 3000 new homes planned for the "village". The recent traffic survey did not take account of this growth nor the fact that under current Covid restrictions use is lower than normal due to the high incidence of people working at home.

- (b) Only one side of the road into Barnham from Church Lane has a pavement and this is extremely narrow – particularly at the junction. Vehicles pass very close to pedestrians and avoiding action has to be taken on occasions to prevent being struck by wing-mirrors. Increasing traffic flows from this junction will greatly increase the risk to pedestrians.
- (c) Church Lane has no pavement and pedestrians have to walk in the road. The route is very well used by pedestrians, children and dog walkers accessing Murrells Field and the country beyond. Adding 400 or more vehicle movements a day out of Marshall Close and into the path of pedestrians presents a significant safety hazard.
- (d) The use of the Marshall Close access by heavy construction traffic would (as per c above) also present a significant safety hazard for pedestrians.
- (e) The junction of Church Lane and Yapton Lane is currently used for commuter parking. This will pose visibility and turning issues for high volumes of traffic to and from Marshall Close.
- Marshall Close is a quiet cul-de-sac not intended for heavy vehicular use. It has a green recreation space at the end used by local children. The increased traffic and construction process would have a devastating impact on this community
- The traffic survey undertaken is flawed in several aspects, being taken as it was in 2020 with the impact of Covid-19 reducing traffic movements, in particular as a result of the lack of commuters coming to Barnham to use the railway, including parking vehicles at this very junction with many people working from home. In addition it appears to have been conducted at a time designed to show less traffic. There are peak flows of traffic in the morning, at school run time and (normally) at commuting times. It also does not appear properly to take into account traffic movements that will already increase as a result of developments already underway or planned in the wider area that will use the B2233.
- It is noted that the WSCC Highways consultation response is seeking further detailed information before giving a formal response to the application.
- Flooding – Environment Agency have objected saying the site is predominantly within Flood Zone 1, with parts in Zone 2 and Zone 3 and as no acceptable Flood Risk Assessment has been provided. BENP Policy ES1, Flooding, drainage and new development as amended in the Emerging BENP states:

ES1a Floodplain - No development should take place in areas at risk from flooding on the Flood Map, unless it can be shown that there are no sites where it would be possible to locate that development, in an area at lower flood risk. If having adopted a sequential approach, it shows the development must be sited in a flood risk area, then it must be designed to be flood resilient and resistant and have a safe means of escape. The need for a sequential test does not apply to changes of use or residential extensions.

ES1b – Reducing Flood Risk - All development proposals on undeveloped land (i.e. greenfield) must demonstrate that there will be no net increase in surface water run- off from the application site as a result of the development. All development proposals on previously developed land (i.e. brownfield) must demonstrate that surface water run-off from the application site as a result of the development will be as close as reasonably practical to the greenfield run off rates from the development for the same rainfall event but should never exceed the rate of discharge from the site prior to its redevelopment. Planning permission should only be granted for new development subject to a condition that: • no development shall commence until full details of the proposed drainage schemes for surface and foul water (including details of their routing, design, and subsequent management and maintenance) have been submitted to and approved by the planning authority; and • no building shall be

occupied until the drainage schemes have been implemented in accordance with the approved details.

- The site is unsustainable and although it was identified as developable in the HELAA there is no evidence that a sustainability appraisal of the site has ever been undertaken. It remains an unallocated site and according to ADC's guidance identification of a site within the HELAA should not be seen as an intention to allocate a site for development or that planning permission will be granted. Land allocations can only be made through the Statutory Development Plan for Arun, which includes the Adopted Local Plan 2018 and the made Neighbourhood Plan for the Parish. This site is not included in either of these Plans. The summary assessment sheet states that should this site be taken forward as an allocation within the development plan, then further assessment will be required to address the climate change impact. It also states that development in this location would have an impact upon the landscape, which is identified in the 2006 Landscape study as being medium/high capacity for development.
- Statement of Community Involvement – The tone of this document is misleading. The Parish Council's view is misrepresented as at the pre-application meeting the Council's position was made quite clear that any planning application for the site would be rigorously and firmly objected to. The statement seems to imply that as long as the Council got a community orchard they would not object. The developers "consultation survey" with elements of the local community took place without the Parish Council's prior knowledge and was skewed in its design towards eliciting a pre-determined response to a false narrative. The question was put on the basis that residents could influence whether 200 or 240 houses were built on this site, but the document failed to make clear that there is no planning decision to use this land for development purposes at all – the HELAA status being misrepresented as a green light. It is arguable that had residents been surveyed on the true option – to develop or not to develop, the results would have been very different. As a "survey" this consultation would never have passed any test of empirical rigour and must be disregarded.
- Biodiversity checklist. This confirms the rich biodiversity of the land in question including the presence of bats, barn owls, breeding birds, badgers and potentially dormice. The survey on the latter appears not to be included. There is allegedly no record of reptiles but local people have referred to the presence of slow worms/ grass snakes. Given the proximity to the ancient rife there will most likely be amphibians. The importance of the site as an ecological "firewall" between large scale developments cannot be overstated. The emerging BENP has identified biodiversity corridors, one of which runs across this land New Policy ES15 Green Infrastructure and Ecosystem Services refers.
- Archaeology - The report describes the importance of the coastal plain in yielding evidence of Neolithic and Romano-British occupation but says that an up to date aerial survey of the proposed development site has not been utilised due to Covid. Given the historic nature of Church Lane and its surrounds this seems like an omission.
- Landscape and Visual Assessment – This document refers to the land as lying close to the SD5 to the north-west (2300 homes). It fails to mention housing developments taking place to the east. Nevertheless, the report recognises the value of the site as a green buffer preventing the coalescence of high-density housing in a hitherto rural area when it says that Church Lane (and its environs) provides "a degree of dispersed and scattered development" in contrast to the new developments which "are changing the distinct settlements of Barnham, Eastergate and Westergate".

Church lane and its adjoining footpaths offer some of the last remaining uninterrupted views of the South Downs. This important visual amenity would be lost through this proposal. Policy ES4 of the made BENP and the amended Policy ES4 in the emerging BENP refers.

- Public Rights of Way - The Parish Council would object to any proposal which seeks to divert or extinguish ancient public rights of way in the vicinity of Church Lane. The proposed development would be in contravention of Equestrian and public access policies under the emerging Neighbourhood Plan. Made BENP Policy GA2 Public Right of Way network and amended Policy GA2 in the emerging BENB refers.

From: Amanda Scholes on behalf of Planning.Responses
Sent: 14 January 2021 12:26
To: Planning Scanning
Subject: FW: Planning Consultation on: BN/142/20/OUT
Attachments: Response to BN-142-20 - Land South of Barnham Station.pdf

Amanda Scholes | Receptionist, Department, Arun District Council | Location: Ground Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Save the environment - think before you print.

From: Clerk [REDACTED]
Sent: 13 January 2021 10:31
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Raymond Cole <Raymond.Cole@arun.gov.uk>
Subject: RE: Planning Consultation on: BN/142/20/OUT

Please find attached the Barnham and Eastergate Parish Council's Planning & Environment Committee's objection response to the above application. The response is submitted in time to meet the agreed extended response deadline of 15th January given to me by Ray Cole.

Alison Crabb
Clerk, Barnham & Eastergate Parish Council

From: planning.responses@arun.gov.uk <planning.responses@arun.gov.uk>

Sent: 01 December 2020 16:04

To: Clerk [REDACTED]

Subject: Planning Consultation on: BN/142/20/OUT

To: Barnham & Eastergate Parish Council

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town & country Planning (Development Management Procedure) (England) Order 2015 - Article 5 - Article 25 Representations by Parish/Town Councils

Outline Consent

Application No: BN/142/20/OUT

Registered: 24th November 2020

Site Address: Land south of Barnham Station Barnham

Grid Reference: 495741 104191

Description of Works: Outline planning application with all matters reserved, other than principal means of access, for up to 200 No. dwellings, with access taken from Marshall Close, associated infrastructure & landscaping & demolition of existing buildings. This application is a Departure from the Development Plan, may affect the setting of listed buildings, may affect the Church Lane, Barnham Conservation Area & affects a Public Right of Way.

The Council have received the above application.

[Click here to view the application details](#)

Should you have any comments to make, these should be sent by replying to this email by 2nd January 2021. You can also monitor the progress of this application through the Council web site:

www.arun.gov.uk/planning.

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website

<https://www.arun.gov.uk/development-plan> as can the leaflet how to respond to planning applications

<https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://www.planningportal.co.uk/info/200207/appeals> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make

Yours sincerely

Raymond Cole

Planning Officer- Arun District Council

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PLCONSULT (ODS) 2020

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