

[REDACTED]

From: Heather Godsmark [REDACTED]
Sent: 24 June 2021 12:44
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Heather Godsmark [REDACTED]
Subject: Application BN/42/21/PL Objection

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Dear Mr Cross,

I attach my objection to this application, though, if a separate **house only** application came forward, I would not post an objection to that for reasons explained in the attached.

Please consider my objection in determining this application and, in view of the serious accident at the Eastergate Lane/A29 Fontwell Ave T Junction, please take my and other locals expressed Eastergate Lane road safety concerns seriously. Local knowledge is often more informed than remote transport consultants and our concerns should not be swiftly dismissed in the 'Not in my backyard' bin.

Yours sincerely,

Heather Godsmark
Director

[REDACTED]

[REDACTED]

Swallowfield, Eastergate Lane,
Eastergate, Chichester,
West Sussex
PO20 3SJ

Heather Godsmark Ltd Registered Office: As above.
Registered in UK: 4518930

Application BN/42/21/PL:

Objection from - Heather Godsmark Swallowfield, Eastergate Lane,
Eastergate, Chichester, PO20 3SJ

Attn Arun DC Planning.

I live close to the development site along the north side of Eastergate Lane, approximately 200ms eastwards from the proposed new HGV entrance. My husband and I have a glasshouse nursery, a permitted countryside commercial use, and so are very aware of the traffic challenges along Eastergate Lane and particularly at its substandard T-junction with A29 Fontwell Avenue.

1) SINGLE APPLICATION - Inappropriate

I wish to object to the replacement Folly house and commercial units developments being brought forward as a single planning application for reason that this muddies and muddles public understanding of the merits and impacts of these two building developments, which are completely separate in all essential planning aspects and applicable planning policies. Both buildings are proposed on 'greenfield' open countryside land, outside settlement limits. The two sites are distinctly separated on the Layout Plan and, although in the same land ownership one totally residential and the other a 5No Commercial Unit business Park. There are no shared facilities, such as entrance, and the two developments are not indicated to have any 'applicable tie' recognised in planning terms and should be considered separately under residential and commercial planning policies and determined separately.

2) THE HOUSE – No objection.

The west end of Eastergate Lane is largely characterised by larger individual houses surrounded by landscaped gardens. Whilst this new house proposal is not acceptable under WSCC & Arun Local Plan planning policies, there is a recent precedent set by an Appeal Decision given to a new dwelling proposal, in a paddock at the rear of Poachers. For this reason, I feel that an objection against this new dwelling would be inappropriate and the small level of additional vehicle traffic it would generate would present little extra road safety risk to Eastergate Lane.

3) 5No Commercial Units for Use Classes B1(E)/B8 - Much more and different from lost existing buildings

I object to the commercial development part of this application which appears to be a totally opportunistic development, without support of any identified local need. The proposed replacement commercial building is totally different in size and character from the building A, 281m² to be demolished, which is the only one of the three buildings A B & C to hold a permission for non-countryside use, a carpet warehouse. The other two buildings B & C to be lost are permitted only for essential countryside uses, previously apple stores and now stabling. Whaleback is false in its claim that all three are commercial use Class B8. Accordingly, the floor areas of B & C cannot be legitimately added as lost Class B8 commercial building space to justify raising the new Class E/B8 building area to 726m².

The applied for commercial uses are not explained or qualified in the application, which is important since Class B1 was replaced in Sept 2020 by a very wide-ranging business use Class E. Under Class E, there are many types of businesses and customer/supplier profiles provided for, which therefore, could occupy the proposed 5No commercial units and produce very high car, van, and HGV traffic movements; many more than the GTA Transport Statement forecast based on floor area alone. I note that the application is not restrained to those uses in E(g) considered to be acceptable within residential areas.

3) 5No Commercial Units for Use Classes B1(E)/B8 cont.

Class E - Commercial, Business and Service: In 11 parts, Class E more broadly covers uses previously defined in the revoked Classes A1/2/3, B1, D1(a-b) and 'indoor sport' from D2(e):

- **E(a)** Display or retail sale of goods, other than hot food
- **E(b)** Sale of food and drink for consumption (mostly) on the premises
- **E(c)** Provision of:
 - **E(c)(i)** Financial services,
 - **E(c)(ii)** Professional services (other than health or medical services), or
 - **E(c)(iii)** Other appropriate services in a commercial, business or service locality
- **E(d)** Indoor sport, recreation or fitness (not involving motorised vehicles or firearms)
- **E(e)** Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- **E(f)** Creche, day nursery or day centre (not including a residential use)
- **E(g)** Uses which can be carried out in a residential area without detriment to its amenity:
 - **E(g)(i)** Offices to carry out any operational or administrative functions,
 - **E(g)(ii)** Research and development of products or processes
 - **E(g)(iii)** Industrial processes
- **B8 Storage or distribution** - This class includes open air storage.

4) Previous Commercial Unit Application EG/19/04 - Refused

This application was for a 4No Unit Commercial Development on the Folly Farmland area now to be lost to the new road. There were two reasons given for refusal, in conflict with many stated WSCC and Arun planning policies.

- 1, Lack of Highway visibility at entrance.
- 2, Activity and traffic generated would harm residential amenities of adjoining dwellings.

Both of these reasons essentially remain valid for this new 5No Commercial business Park, although the serving access is now off Eastergate Lane which has a very different character than Fontwell Avenue and the residential properties impacted will mostly be North and South of Eastergate, and probably the new Barratt's housing opposite once it is built.

5) New HGV Access off Eastergate Lane. – Inappropriate and enhances safety risks

Eastergate Lane has no pedestrian footpaths and a hazardous T junction with Fontwell Avenue, with no verge on north side and severely restricted width and visibility. All HGV's servicing countryside permitted businesses up Eastergate Lane are restricted to accessing the lane from Fontwell Avenue and take up the full width of the T Junction to do so, holding up traffic on both roads to make this manoeuvre.

The GTA Transport Statement appears to be quite light weight in its consideration of the traffic issues associated with the proposed new HGV entrance.

- It fails to note the field gate that I believe will be upgraded to form the new House entrance.
- It claims to consider the existing situation but fails to appreciate the implications on road safety to the many school children, disabled Hft Care Village young adults and other locals that are vulnerable that must use this lane, without footpaths and an unsafe and challenging T Junction with Fontwell Avenue, to access all the village essential community facilities to north and south.

5) New HGV Access off Eastergate Lane cont.

GTA Transport Statement

- It claims that the proposals are compliant with Arun and WSCC current policies and many other guidance documents but the references selected do not give a realistic picture of relevance to Eastergate Lane. Just looking at one document, the WSCC Transport Implementation Plan identifies the following strategic aims for Arun:

- Increasing sustainable modes of transport.
- Improving network efficiency to improve journey times and air quality
- Improving safety for all road users
- Discouraging HGV's from using unsuitable roads
- Improving accessibility between communities within the district.

Increasing sustainable modes of transport:

Folly House and outbuildings are being demolished to allow the building of a new A29 Realigned Road running immediately beside the proposed commercial unit building. This new road will bring a footpath/cycleway network to promote sustainable travel? To comply with this strategic WSCC Aim the commercial units should link into this proposed new facility instead of exacerbating safety to the existing community having to walk Eastergate Lane without any footpaths.

Improving network efficiency to improve journey times and air quality.

The commercial units will increase HGV, Van and car traffic on Eastergate Lane, just 100ms from the substandard T junction. The extent of traffic increase is likely to be much higher than claimed by GTA given no assessment of traffic generation likely to arise from the different class uses this application seeks to permit. With a new A29 road to be built along the commercial site's southern boundary, the only sensible proposal to meet the above strategic aim is to form access from that new road.

The below photo shows the challenges for HGV's to access Eastergate Lane and similarly, GTA's own tracking plan shows the complete blockage of the lane when HGV's will Access the proposed new commercial entrance.

Looking westward towards HGV entering Eastergate Lane from Fontwell Avenue.



5) New HGV Access off Eastergate Lane cont.

Improving safety for all road users

With the presence of the Hft Care Village, Eastergate Lane has a disproportionate number of vulnerable pedestrians who have to walk down the Lane, without footpath protection, to access the bus stop and all other community facilities up and down Fontwell Avenue ... shop, doctors, physio, church, sports and recreation, schools, village hall, eateries ... and more ... a long list. Increasing HGV and other forms of traffic along Eastergate Lane from this application will only exacerbate road safety risks for the vulnerable. We are already predicted to experience up to 30% more traffic up Eastergate Lane once the new road and all new local extensive housing developments are complete.

Discouraging HGV's from using unsuitable roads.

This strategic aim speaks for itself and opposes any new HGV entrances to be formed along Eastergate Lane.

Improving accessibility between communities within the district.

This strategic aim can only be met by the commercial access being formed off the proposed new A29 road abutting the commercial site's southern boundary. If the road does not go ahead then the Folly house and barns will not be demolished so this application will be redundant.

6) GTA: Transport Statement conclusion. - Incorrect

GTA concludes that 'the proposals are in accordance with current policies and guidance provided by Arun DC and West Sussex County Council' and that 'there are no material highway and transport impacts as a result of the proposed development'. I totally disagree.

West Sussex structure Plan: CI 38 Policies

(Bold text is as set out in WSCC S. P. document)

Application is contrary to Locational strategy Policy LOC1

- 'outside built up area boundary and does not involve re-use of previously developed land, (including reuse or conversion of existing buildings). It is not within any of the identified strategic locations in adopted or draft local plans for any class of non-rural commercial development'.

..... The applicant claims that IT IS LOGICAL TO REPLACE HIS DEMOLISHED BARNs on the remaining land in his ownership but this is 'personal logic' and does not hold any planning logic or planning merit sufficient to support approval against Policy LOC1.

- 'we will give **priority to the development of brownfield sites before greenfield sites** whilst ensuring that the quality of the local environment is protected and, where possible, enhanced (LOC1).'

..... The 5No Commercial unit site is not a brownfield site and with extensive loss of wildlife habitat resulting from the BEW New A29 and housing, this greenfield area has enhanced importance to support the residual wildlife, particularly since it is positioned beside what will become the last remnant of old apple orchard and the residual part of a very mature oak woodland copse, including 3No Veteran oaks.

- 'we will plan positively to guide the majority of the additional greenfield development to a limited number of general locations where large-scale mixed-use developments should take place - the **'Strategic Locations'**.

..... This site is not associated with any of the identified Arun Business Strategic Locations.

6) GTA: Transport Statement conclusion. Cont.

Application is contrary to Locational strategy Policy LOC1

- we also support some small-scale development on the edge of the main towns in public transport corridors to meet identified local needs and the **evolution of rural communities** through the small-scale, gradual growth of some villages and small towns where this meets local needs for homes and jobs, and supports facilities and services (LOC1).

.... This development does not meet a rural need. It is nor Agricultural, Horticultural, (Equine) or Forestry. It is an opportunistic new business park offering 5 No independent commercial units with broad classifications unrelated to countryside. The land owner will lose one barn which had permission to operate only as a carpet warehouse, a permission awarded specifically to the landowner only since it had been already in continuous use for that same purpose for 10 years. It was not approved for Class 8 use under application EG /57/11/CLE. The other two barns do not hold any commercial use classification that is unrelated to rural uses.

Folly House and barns are proposed to be demolished to facilitate the new A29 Road and the land owner has sold them to a developer at an amicably agreed price and not through a compulsory purchase order. With a wish to build a 5 Unit business park with wide-ranging class uses, rather than just carpet warehousing, it would be more appropriate for the landowner to consider investing in one of the carefully selected and planned for Arun strategic business locations. Isn't protection of the countryside and logical business planning the driver behind Arun designating its Local Plan 'Strategic Business Locations'?

Application is contrary to the Countryside Policy LOC2

- 'Development in the countryside, including undeveloped coastal locations, should not be permitted unless it can be demonstrated to require a countryside location'.

... There is no demonstrable need identified for 5 No independent commercial units to be built in a countryside location and certainly not off a narrow country lane, without footpaths and close by to a significantly substandard and visibility and space challenged T junction. This application does not provide evidence of meaningful environmental enhancement and I note that the building is set too close to the old orchard boundary to provide boundary landscaping and its maintenance access. Looking at the layout it seems the building is set tight to the eastern boundary to allow space for extension later to the west and I suspect the car park layout is designed to increase car bay numbers later by taking out bay shaped planting areas. I see no commitment for a long term landscaped setting for this application layout nor adequate planting to protect the interests of neighbours and wildlife.

7. WSCC Aims and Policies - Not met by proposal.

- 'we will support development in the countryside to meet local **rural needs**, that is, proposals to help keep it as a place of varied and productive social and economic activity, including farm diversification (NE8)'.

.....The Classes applied for are not identified as meeting any local or social economic need to sustain the countryside

- we will resist applications not associated with 'primary rural uses such as agriculture, horticulture, and forestry nor part of farm diversification schemes essential to ensure the continued viability of farming operations'

.... Clearly, this application is contrary to Policy NE8 (a) and against Needs (3) since this development will result in an unacceptable increase in traffic levels and does not offer any realistic, safe and easy access by a range of transport modes; its offer is exclusively vehicular.

7. WSCC Aims and Policies. cont

- Policies NE 9 and NE 12 promote development in established centres only and resist **out-of-centre shopping, leisure and other facilities** unless they are shown to meet identified community needs which cannot be provided in existing centres and must be in a countryside setting.

.... The Application is contrary to this policy. There is no evidence supplied to show that this commercial unit cannot be happily provided for in an established centre or that it must have a countryside setting.

- we support proposals for development which help to manage the anticipated growth in demand for communication and travel by achieving more sustainable transport patterns (NE13).
- we want to see new or improved transport services and facilities which encourage walking and cycling, and which meet the needs of those with impaired mobility (NE14).

The application HGV entrance, accessed off a narrow lane without footpaths or cycle ways, just 100ms from a hazardous T junction opening out on to an increasingly heavily congested main A29 trunk road, cannot safely encourage walking and cycling and particularly for those with impaired mobility without funding significant safety improvements to Eastergate Lane. Currently, school children, the Hft Care Village residents, other disabled and school children are only able to access the A29 footpath for schools, doctors, shop, bus stop, etc on foot or by way of cycles and mobility tricycles.... So fails to meet Policy (NE14)

Transport Policy NE13

(a) In order to manage successfully the anticipated growth in demand for communication and travel, proposals for development should be permitted provided that, where possible, they: (1) widen travel choice and promote walking, cycling and passenger transport; (2) improve road and personal safety for the travelling public; (3) integrate the different types of transport and the various provisions of service to maximise the efficiency of transport systems; (4) assist the promotion of an efficient economy and the achievement of sustainable economic growth; (5) reduce traffic growth, pollution and congestion in order to protect public safety, the economy, and the natural and built environment; and (6) promote access to facilities and services for all.

(b) Local plans will include policies to reflect the strategic intent in (a) above.

- we support proposals for development which help to manage the anticipated growth in demand for communication and travel by achieving more sustainable transport patterns (NE13).

.... The proposed commercial unit business park fails to meet (NE13) policy criteria as well.

Character Policy CH1 & CH3

- we will protect the **settlement pattern** of the county by maintaining and enhancing the separate identity and character of all settlements and preventing their coalescence. We will stop the main towns and villages from merging with one another by maintaining strategic gaps.

The west end of Eastergate Lane is characterised by larger detached dwellings surrounded by gardens. The closest business site is at Hillview, less than 100ms east of the proposed HGV entrance and 200ms away from the substandard T junction. Historically, Hillview Farm buildings held a permission to allow Premier Poultry to operate as a meat packing business. However this permission became void following that company moving to a strategic business location, near Littlehampton. Premier Poultry moved following repeated noise complaints from nearby residents, arising from refrigerated HGVs arriving in early hours and parking up on roadside verges outside dwellings, with refrigeration units running until the business premises opened. With the wide ranging business covered under Classes E & B8, there is no evidence that similar anti-social impacts will not apply to this application commercial park in the future.

7. WSCC Aims and Policies. cont

Environment Resources & Assets

- we want to make the **best use of land** that has to be developed so that the need to develop on greenfield sites is reduced (ERA1).

.... Undoubtedly, the commercial park conflicts with policy (ERA1) as it would occupy Greenfield land.

Development

- we want development to be of a high quality and to reflect the character of West Sussex and its different parts (DEV1).

- we want new development to provide the infrastructure, facilities and services (including passenger transport, roads, schools, libraries, health provision, open space, and flood defence) required to serve it. New development should not make services and facilities worse for people elsewhere. We support the provision of the physical and social infrastructure required to meet the needs of all residents and businesses (DEV3).

.... The design of the business park does not reflect local character. It does not improve local infrastructure, facilities and services and is likely to degrade local residents' amenities and reduce pedestrian safety along Eastergate Lane. It is contrary to (DEV1 & 3)

Travel needs and choices Policy

- we want new development to provide for the transport needs it generates, to enable a choice of means of transport which is safe and convenient, to encourage and enable an increase in walking, cycling and the use of passenger transport, and to minimise the number and impact of motorised journeys (DEV4).

- we want to ensure that new developments have enough car parking so that environmental or safety problems do not arise but not so much that it encourages the use of the private car in preference to walking, cycling and the use of passenger transport, where this is, or can be, a realistic alternative (DEV5).

... the Business Park proposal shows only motorised access for deliveries and customer alike, though it could offer links to footpaths and cycle ways proposed to be built immediately to the south within the BEW Phase 1. The wide ranging use classes applied for and car parking provision to serve customers, down a long driveway off Eastergate Lane, only will encourage car use rather than more sustainable modes of transport. It is contrary to (DEV4 & 5)

Policy DEV6 ; 'new greenfield development on the edge of towns and villages, including the major development areas (the 'Strategic Locations'), to be well-thought out, well-planned, and well-laid out so that it integrates with existing communities, respects the local character and the character of West Sussex as a whole, and makes a positive contribution to quality of life'

..... The 5No Commercial Units proposal is not well thought out since it exploits a piece of Greenfield countryside without any demonstrable viable planning need for it in that location as opposed to a more Strategic planned business location. It pays no heed to local road safety and alternative modes of sustainable transport which could be offered by an access off the proposed new A29 road. There is no certainty that unacceptable types and volumes of traffic will arise to the detriment of Eastergate Lane safety and residential amenity, given the wide business coverage Classes of E and B8. Clearly, it is contrary to (DEV6)

8 ARUN DC Local Plan Policies. – Application is not in compliance

1) Arun's Local Plan Policies reflect and further define the aims and objectives of WSCC policies as they relate to the Arun District. Within its strategic objectives, Arun includes for protection of the countryside, promoting sustainable transport and other objective but an essential aim is to provide 'appropriate employment sites'. Arun fulfils this aim by including in its plan strategically located employment sites. Its does not promote commercial business development in the countryside which is not dependent on a countryside setting or on countryside Greenfield sites. With so much land lost to residential development in the Fontwell, Barnham, Eastergate area, protection of remaining countryside against unsuitable development becomes even more important, particularly around settlement edges to avoid countryside character erosion.

2) Arun strongly promotes sustainable development and emphasises that 'Improving connections, both through the road network and pedestrian and cycle networks, will be vital to the sustainable development of the future'. Therefore to comply and accord with 'sustainability', if permitted the application business units must be alternatively accessed from the new A29 realigned road and linked to its associated footpaths and cycleways.

3) The commercial units fail to meet many aspects of Aruns Sustainability policy SD Sp1a.

- provide for growth of the sustainable villages whilst maintaining their setting in open countryside.
- support job creation through allocation of employment land strategically located.
- encourage effective use of previously developed land.
- retain and enhance natural environmental resources.

4) The application totally fails to meet Arun's Countryside Policy C SP1 which protects the countryside against unsuitable development. Suitable development must require a countryside setting and be related to agriculture, horticulture and forestry, mineral extraction and where allocated, waste management. This policy promotes quiet recreation, green infrastructure, rural economy diversification (on farms etc), road and cycle schemes and specific development which must accord with other plan policies.

5) Arun's strategic objective for Policy EMP SP1 for employment and enterprise focuses on providing appropriate employment sites on strategically allocated land.... so not commercial development on Greenfield countryside. Policies EMP SP2 & EMP SP3 support employment opportunities in allocated Bognor Regis and Littlehampton Growth Areas. Neither of these policies support non-countryside use Classes E & B8 commercial development off Eastergate Lane.

6) The existing Folly Farm Building A is in carpet warehousing business use but the application is for a much bigger size of development of 5No independent units offering broad spectrum Class E and B8 usage. Essentially, it is a new small business park in the countryside and on Greenfield land cannot be considered as farm building diversification of use. The application must fail against Policy EMP D1 since it is not an application to maintain an existing business use, and I note that this is not claimed in the application.

7) Looking through Arun's many other policies, I cannot find any that would specifically support approval to the BN/42/21/PL application. Whaleback claims that it should be looked at exceptionally as it replaces demolished buildings but all the buildings and land around them have been agreeably sold to a developer and not compulsorily purchased. I cannot find any policy that would promote approval under these circumstances as an exception to planning policies and it would set an uncomfortable precedent for Arun to do so.

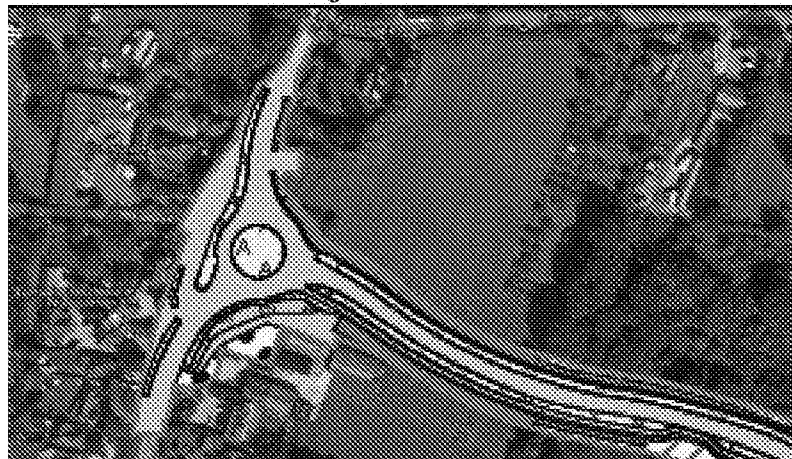
8) Given the recent appeal decision on a new house closeby, north of Eastergate Lane at Poachers, for a site in 'countryside', I think that exceptionally Arun might be minded to award permission for the house part of the application, although by doing so Arun will be further reinforcing this type of development as an acceptable planning precedent.

9. Whaleback planning Statement. – Misleading and containing errors.

1. It does not make it clear that only the existing building A benefits from a commercial use approval, given back in 2012 to permit lawful use only as a carpet warehouse, to regularise an undisclosed warehouse usage which had continued over the preceding 10 years. The other existing buildings B & C have remained in rural use as stabling/apple stores.
2. Building A has a floor area of 281m² but this application is for 726m² commercial floor space, which seems an excessive increase in area if only the current carpet business needed to be replaced. However, this application is not described for a carpet warehouse replacement building but for so much more. In fact, the application requests approval for all of any of the vastly differing business profiles meeting Class E and B8 criteria.
3. I note that the building is called single storey but at the elevation height s given, eaves height of 3.8m and ridge height 6.7m, this building is actually high enough to have a mezzanine floor and the wide roller shutter doors will accommodate forklift activity with all the annoyance to close by residents of safety beeping accompanying its manoeuvres.
4. The Neighbourhood Plan considered by Whaleback, against this application is the Aldingbourne NP but it should be Barnham and Eastergate NP.
5. In 30, Whaleback states ‘This (demolition of buildings) is to facilitate an infrastructure project is an exceptional circumstance and therefore the proposal for replacement development must be considered in this context’. Firstly the application is not replacing a like for like business facility and whilst loss to infrastructure may be exceptional, the landowner has willingly sold his assets for an agreed price without compulsory purchase. Accordingly, this business development application must stand on its own feet without any preferential influence.
5. This commercial application must not be looked on more favourably than any other independent commercial business application to be tested against all applicable planning policies. There can be **no acceptable planning logic** to replacing the lost business premises with something very different, serving very broad business profiles and in an inappropriate countryside situation, even if the land remains in the landowners ownership.

Landscape Character and Visual Impact

6. In Cl. 39, I note that whaleback claims that the site ‘will not appear as open countryside since there is development on either side’. I totally disagree and this is deceptive since to the west of the commercial site area there is the extensive landscaped garden of Lyndhurst and to the east there is an old apple orchard and beyond, mature Oak woodland including three veteran Oaks and further field and hedges.



Showing new A29 and open countryside views around and Over Application Site on its North side.

The two storey Lyndhurst house is distanced NW of the proposed commercial building position, close to the Eastergate Lane/Fontwell Avenue T junction. The dwelling, Wayside, is positioned in the NE corner of the adjacent old orchard, with a very low visual impact being a bungalow with small loft extension, set behind orchard trees and hedges and close to Eastergate Lane. The next property is Hillview Farm, hidden behind orchard, substantial veteran

9. Whaleback planning Statement. – Misleading and containing errors.

7. Without this new substantial block shaped commercial building butting up against the new A29 road boundary, the view across from that new road and new Barratt's housing, from the new A29 Fontwell Avenue roundabout up to the existing Ewens Close/Chantry Mead/Murrells garden developments in Barnham, will be totally characterised by trees, hedges, open fields and wooded countryside. To add this bulky faceless commercial unit in its proposed position sadly will diminish the quality of the views from travelling along the new A29 and from the proposed new housing opposite. This commercial unit development needs to be located in a planned strategic business park not in the countryside, to comply with WSCC and Arun policies.

8. I consider that the 5No Unit commercial building will harmfully visually intrude into available countryside views and will have an architectural appearance totally unrelated to its immediately surrounding properties which are all residential. Additionally it is inadequately landscaped on its southern and eastern sides and both the building and car park appear designed to be ready to be extended and intensified. At a ridge height of 6.7ms (22ft) and a block façade of length 50ms (164ft), the visual bulk of this rectangular block industrial building will be adversely imposing and harmfully erode the countryside character of our village surroundings.

Neighbouring Amenity – will be adversely affected

In cl. 45, Whaleback claims that commercial Class uses B1 and B8 would not generate significant noise. However, B1 is replaced by Class E which encompasses a vast range of commercial types which can generate significant noise and significant traffic events, as can B8. The residents of Eastergate Lane West End have not forgotten the prolonged early hours, verge parked, refrigeration lorries waiting for Premier Poultry to open its gates. There is no restriction against this happening again. In addition, **B8 Storage or distribution** allows for open air storage, which could equally become unsightly, uncontrolled and building up over time, beside a countryside residential area.

Many Class E business profiles, could promote significant increased customer traffic.

Display or retail sale of goods, other than hot food; Sale of food and drink for consumption (mostly) on the premises;

Provision of: Financial services, Professional services (other than health or medical services), or other appropriate services in a commercial, business or service locality

Indoor sport, recreation or fitness (not involving motorised vehicles or firearms); Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)

Creche, day nursery or day centre (not including a residential use);

Uses which can be carried out in a residential area without detriment to its amenity: Offices to carry out any operational or administrative functions; Research and development of products or processes, Industrial processes

9. Whaleback planning Statement. – Misleading and containing errors.

Neighbouring Amenity – will be adversely affected

The HGV entrance will cause blockages across Eastergate Lane, as shown on the submitted tracking plan, and at the unsafely aligned Eastergate Lane T junction with Fontwell Avenue. Shunting of HGV's to gain access into a narrow, visibility challenged lane produces unreasonable engine revving and reverse motion beeping, both extremely aggravating in a countryside residential area. The residents of Wayside, closest dwelling to the proposed new HGV entrance are particularly vulnerable, both elderly and one wheelchair bound, and at a stage in life when enjoying the peace and interest in their garden holds a premium.

External lighting is quoted as being 'kept to an absolute minimum' and 'only operational during active business hours' which hardly confirms whether there could or could not be adverse impacts. So close to the Orchard, Veteran Oaks and Oak copse, commercial lighting cannot do other than adversely impact on wildlife generally and on the welfare of the local bats known to roost in the veteran oaks.

Transport/Highways.

In cl. 51 Whaleback Statement comments that 'Eastergate Lane is a dual Lane which provides safe access between the A29 and Walberton'. It is a single carriageway lane with many low visibility bends, the worst being at the junction with the A29.(See Addendum Note) It is HGV restricted to entrance only via the A29 and not through Walberton. I see no particular harm to the field gate becoming a residential entrance but I strongly object to further HGV entrances so close to the risky A29 T junction.

As the uses to which the commercial units will be put are unknown, predicted traffic to and from it in terms of cars, vans and HGVs cannot be forecasted. A crèche could generate a lot of movement at specific times of the day and a fitness facility throughout the day... who knows?

ECOLOGY

Within the application, there does not appear to have been any site specific appropriate evaluation work presented and a biodiversity gain cannot be claimed without evidence. Basing a claim of Bio-Diversity Gain on the back of the A29 Realigned Road BNG findings is disingenuous and, additionally, that projects calculations were based on flawed assessment information. With the huge loss of wildlife habitat to arise from the BEW Phase 1 developments, the value of this piece of grassland abutting old orchard, Veteran Oaks and mature Oak woods becomes more precious to support our local wildlife welfare and habitat retention.

My Conclusion

- The residential property will be in keeping with the local area character of existing close by residential properties, using an existing field gate entrance position, so there is likely to be insignificant harm and I do not object to this part of the application.
- I believe that the 5No Business Unit is totally unacceptable under most planning policies and should not be permitted. The landowner should be recommended to build his commercial unit on an Arun Strategic business location instead. The landowner has been agreeably paid for his lost barns and land, so he will be able and at liberty to similarly invest in commercial development elsewhere and should be encouraged to do so.
- There is no legitimate planning reason to favour the granting of an approval to this 5No Unit Business Park development, in a totally inappropriate countryside residential setting, off a narrow, road safety challenged lane without linking to sustainable modes of transport, footpaths and cycle ways.
- Allowing this commercial development erodes the countryside and sets a precedent for allowing commercial building outside of strategically allocated locations, without sustainable modes of transport available and against a black-cloth of spaced countryside housing and an exceptionally unsuitable lane. This lane, without footpaths and in places without even verges, is already challenging to current users, be they local school children, walkers, disabled, horse riders or local motorised traffic.
- I recommend that the applicant be asked to either withdraw the business development part of his application, retaining only his house OR be asked to separate his application into two application sites so that the merits of each can be soundly tested against policies and the confusion removed from including totally different land uses on different site areas in a single application.

ADDENDUM - Unfortunately, the long expected '**accident waiting to happen**' at the Eastergate Lane/Fontwell Avenue T junction happened this morning appearing to involve three cars and necessitating many police vehicles, fire brigade and ambulances to attend. I am hoping that no-one is seriously injured BUT it is time that planning officers took local opinion more seriously in determining applications. All locals know this junction is safety challenged, not just by its substandard geometry, lack of pavements and no verge and inadequate visibility on northern side, but also for the adverse slope down to the A29, which comes into play when roads are icy.



24/06/21 View northwards up A29 with Eastergate Lane leading off to right.