

From: Amanda Scholes on behalf of Planning.Responses
Sent: 10 June 2020 09:01
To: Planning Scanning
Subject: FW: Comment on Planning application BN/50/20/PL
Attachments: BN50-20-PL.pdf

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Save the environment - think before you print.

From: Nicola Moore <Nicola.Moore@arun.gov.uk> **On Behalf Of** Planning
Sent: 10 June 2020 08:41
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Comment on Planning application BN/50/20/PL

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From: Andy Vawer [REDACTED]
Sent: 09 June 2020 21:01
To: Planning <Planning@arun.gov.uk>
Subject: Comment on Planning application BN/50/20/PL

Reference BN/50/20/PL

Proposal	Demolition of existing structures on-site & erection of 42 No. dwellings with access, parking, landscaping & associated works. This application is a Departure from the Development Plan.
Location	Land west of Fontwell Avenue Fontwell Avenue Eastergate PO20 3RX
Parish	Barnham & Eastergate
Case Officer	<u>Mr S Davis</u>

Dear Sir,

I would like to register an **objection** to the above planning application. I have attached a copy of my objection to this email as it is too long to be accepted by the online planning portal.

Yours faithfully

Andrew Vawer

Andrew Vawer
1 Wandleys Close
Eastergate
Chichester
PO20 3SH

6th June 2020

Planning Department
Directorate of Place
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

re: Planning Application BN/50/20/PL

Land west of Fontwell Avenue Fontwell Avenue Eastergate PO20 3RX
Demolition of existing structures on-site & erection of 42 No. dwellings with access,
parking, landscaping & associated works.

Dear Sir,

With respect to planning application BN/50/20/PL, **I wish to register an objection.** My reasons for this are as follows.

- The site is not allocated in the current made Barnham and Eastergate Neighbourhood Plan.
- The site is considerably outside the built-up area boundary
 - The latest Arun HELAA states, “Outside the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable.”
- The site is in conflict with a number of current planning policies
 - Arun Policy SO DM1 (Soils) according to Arun District Council’s own assessment. The site is currently an agricultural greenfield site.
 - Barnham and Eastergate Plan Policy ES10 as some hedgerow will be removed
 - Barnham and Eastergate Plan Policy GA4 – Parking and New Developments
 - In order to comply fully with Arun policy ENV DM5, more information on Biodiversity Net Gain needs to be provided than is currently in the EIA. There may be risks to bats with development of this site.
- The developer attempts to justify the site in the information distributed to local residents.
 - There is reference to the current lack of a 5 year housing supply. It would appear that the developer is trying to capitalise on the current delays due to the COVID-19 situation. The joint letter from Arun District Council, West Sussex County Council and other District Councils to the Secretary of State concerning this is noted. The letter from Walberton Parish Council to Mr Jenrick is also of note.

- There is reference to the 2017 HELAA in the information distributed to residents with a potentially misleading quote which omits the contravention mentioned above. It gives the impression to residents that Arun District Council are in favour of this site which is presumptive prior to full assessment by Planning.
- I note also that, in Planning Appeal reference APP/C3810/W/19/3236911 the Inspector stated:

20. However, as the national Planning Practice Guidance (the PPG) makes clear “the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s ... requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements”. It is therefore clear that the HELAA relates predominantly to the plan making process rather than decision making and I therefore give the HELAA assessment little weight in the determination of this appeal.

- I also note that in response to criticism of the latest HELAA by Walberton Parish Council, Arun District Council states, linked to the above, that:

While you may have promoters pointing to this HELAA assessment for sites that they intend to progress through the decision making process with local communities – this caveat must be borne in mind and will be upheld by the planning Inspectorate.

- Traffic issues

The site has a proposed entrance onto the A29 Fontwell Avenue.

- This road has seen a considerable increase in traffic. In the past 10 years there has been a 40% increase in usage. The average HGV count over this period is 3% of all motor traffic. Statistics are from <https://roadtrafficstats.uk/traffic-statistics-west-sussex-a29-eastergate-46311>
- The proposed entrance results in three junctions with this road, in a 40mph limited section, within approximately 110metres. Note that, being national speed limit 280m north of the first junction, not all traffic slows to the 40mph posted limit in time. Indeed, the developer’s own survey suggests that 15% of traffic is travelling in excess of the posted limit.
- The right turn from Wandleys Lane onto Fontwell Avenue is at an angle such that approach visibility may be reduced to the north.
- There is poor pedestrian access to the west side of Fontwell Avenue. The proposal adds an uncontrolled pedestrian crossing in the middle of the aforementioned multiple junction grouping on a road with fast traffic. The added distraction to motorists may pose an increased hazard to both them and pedestrians.
- During rush hour when the Woodgate level crossing is closed, traffic queues frequently reach this point on the road. Extra traffic from 42 residences will not improve this situation.
- There is a site very close by with outline planning consent for 400 dwellings, also with an entrance proposed for Fontwell Avenue. This would be expected to increase traffic further. As the proposals for 3000+ dwellings further south down the A29 are not yet concrete I have not considered the potential traffic impact of this.

- Parking

- The site has parking allocations below the standard set by Arun District Council.

- The developer justifies this by stating that it is acceptable when backed up by a suitable Travel Plan. The Travel Plan and Transport Assessment documents supplied, however, are quite unsatisfactory:
 - Section 3.7 states, “The footway on Fontwell Avenue is facilitated by dropped kerbs and tactile paving to support the safe crossing of pedestrians.”
 - The footway along Fontwell Avenue is narrow and uneven. It is in places a challenge to push a baby buggy along the footpath. Pedestrians coming the other way have to walk in the road to pass.
 - Tactile paving is not present at all of the road junctions where pedestrians need to cross.
 - The pedestrian crossing point at Eastergate Lane lacks tactile paving and has poor visibility for pedestrians, especially when crossing north to south.
 - Cyclists regularly use this narrow footway.
 - Section 3.8 states, “Although there are no dedicated cycle lanes on Fontwell Avenue or within the vicinity of the site, the flat topography of the road network promotes an attractive environment for cycling. As the local area is within a village environment, it is also naturally conducive to on-road cycling with the carriageway of Fontwell Avenue sufficient to allow vehicles to pass a cyclist safely.”
 - Fontwell Avenue is a busy road with increasing levels of traffic.
 - 3% of this traffic is classified as HGV traffic.
 - It has speed limits of 60mph (national speed limit), 40mph and finally 30mph.
 - Passing places for vehicles to safely overtake bicycles within the guidance of the Highway Code are considerably reduced by the amount of single and double white lines; many motorists try to avoid crossing the solid lines by leaving insufficient space between the bicycle and the vehicle.
 - Opportunities to safely overtake are reduced by the presence of junctions and turning lanes which may be occupied by stationary vehicles.
 - There are no official cycle routes immediately local to the proposed development.
 - Sections 3.10-3.15 refer to the A29 realignment scheme improving pedestrian and cycle access.
 - The scheme exists solely on paper and has not yet been submitted as a planning application.
 - Reference to this scheme is therefore optimistic and potentially misleading.
 - Reduction of car travel is suggested to include support of events such as, “Promote Walk to Work Week.” The feasibility of walking to work for a significant proportion of the new residents based on employment opportunities in the immediate area seems limited.
 - Public transport is limited. Although a regular bus service is available, the services are infrequent and not very practical. With this, the hazards of cycling and poor pedestrian access, I dispute the use of the phrase, “Will promote walking and cycling and deter private car ownership,” in the Sustainability Appraisal.
 - The Travel Plan contains other errors suggesting that it has not been reviewed editorially. If very basic errors are present it raises my concern regarding any more complicated matters. For example,
 - Incorrect road names (“Level Mere Lane”).
 - There is no such thing as a “derestricted speed limit”.
- Local infrastructure
 - Local childcare is already at its capacity.
 - There is no provision here for extra childcare or school capacity.

- The availability of local healthcare (GP, Dentist) is limited and there is no provision here for its support.
- Drainage
 - Development of the site may increase the degree of surface water runoff. The site under development further south (The Hedgerows) already requires 24 hour pumping to prevent flooding. With long term predictions suggesting increased winter rainfall, any interruption to power supply combined with the increased runoff could be catastrophic.
 - At the time of writing I cannot locate a comment from Southern Water regarding the ability to handle further foul water from the site.
- Community Engagement
 - The degree of public consultation has been minimal.
 - There has been no Open Day or other direct consultation. Admittedly there have been restrictions on public meetings of late, but the effort to follow up a flyer distributed that many may just dispose of as 'junk mail' has been non-existent. A delay may have been more appropriate. It appears the developer is again using COVID-19 as an excuse to keep exposure minimal.
 - The application states that 1027 leaflets were distributed and 6 responses have been received. A response rate of 0.6% cannot be considered to be a particularly successful consultation.
 - The Statement of Community Involvement has a Distribution map for the flyer, but a number of residents within this area have not received a copy of the information.

Yours faithfully

Andrew Vawer
(by email)