

Mr. Michael Eastham
Planning Policy & Conservation
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date: 07/05/2019
Our ref: /17379215v2
Your ref:

Dear Mr Eastham

Re. outline application for up to 28 no. dwellings on land at The Boweries, Barnham Road, Eastergate, PO20 3RT (ref. EG/22/19/OUT)

We write on behalf of our clients, the Church Commissioners for England, CEG and Hanbury Properties, all of whom own or control the majority of land within the Barnham Eastergate Westergate (BEW) strategic allocation (Local Plan, Policy H SP2c SD5).

We wrote to the Council on 22 October 2018 in relation to the previous application on this site (ref. EG/42/18/OUT) raising several concerns about the proposal. The application was subsequently withdrawn by the applicant.

This planning application (ref. EG/22/19/OUT) is almost identical to the previous planning application except for the position of a few dwellings on the Proposed Site Layout Plan (ref. 101-PO3). As such, the concerns we raised previously remain and for ease of reference these are set out below.

- 1 Local Plan Policy H SP2 requires strategic site allocations to be comprehensively planned and have regard to a masterplan endorsed by the Council. The BEW masterplan is progressing but it is at an early stage and is not confirmed.
- 2 The masterplan cannot be confirmed until West Sussex County Council's preferred route for the realigned A29 has been agreed. Whilst consultation on the preferred route has now taken place, this ended recently, on 26 April 2019. Whilst we do not anticipate the route of the A29 changing, there remains a risk that it might and if it did, this application could prejudice its delivery.
- 3 Local Plan, Policy H SP2c SD5 part (a) aims to avoid further physical coalescence of the three villages through the delivery of green infrastructure and states that Eastergate and Barnham should be protected from a continuous urban form / coalescence along the Barnham Road (B2233). The BEW masterplan, including the approach to green infrastructure across the allocation has not been agreed and until it is, this application, which is located between the two villages, could compromise this policy objective.
- 4 We remain concerned about the proposed access arrangements for which detailed approval is sought. The Strategic Landscape Masterplan (ref. LLD1257-LPL-FIG-002) proposes an internal road network which provides for potential connections to the south, however, notes that *'this depends on the evolution*

of the detailed Master Plan'. We remain of the view that detailed access arrangements cannot be confirmed until the BEW masterplan is fixed.

- 5 As noted previously, we remain unconvinced that the required visibility splays of 2.4m x 43m can be provided on the Barnham Road access; that all footways meet Manual for Streets guidance in terms of dimensions; that the strategic Westergate cycle link along the southern boundary of the site can be accommodated as required by Policy H SP2c SD5 (part g(v)); or that there are adequate vehicle turning opportunities throughout the site, particularly to the south. As access arrangements are a detailed matter, it is important that this is given due consideration at this stage, particularly to ensure that opportunities are not missed to connect the allocation and the wider area through vehicular, cycle and pedestrian routes.
- 6 We commented previously that more parking should be provided to reduce the risk of overspill parking both within the site and onto the surrounding existing/future highway network. The level of proposed parking has not changed since the previous application and our concern remains.

Lastly, to ensure the effective delivery of the BEW site and its associated infrastructure, it is essential that all developments coming forward within the BEW allocation contribute proportionately towards infrastructure identified in Local Plan Policy H SP2c SD5 and the Infrastructure Delivery Plan. The applicant has not proposed heads of terms but we are keen to see this should this application progress.

We trust that this letter of representation is helpful but should you require any further clarification, please do not hesitate to contact my colleague, Pauline Roberts, or me.

Yours sincerely


James McGowan

Planner

Copy:

John Weir, Church Commissioners for England

Jon Allen, CEG

Joe Godfrey, Hanbury Properties

Richard Wain, Hawksmoor