

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

**Date:** 22 August 2018

**Our ref:** 14677/SSL/Jb/16364568v1

**Your ref:**

Dear Mr. Eastham

**Representations in relation to application (ref. EG/42/18/OUT) for outline planning permission for up to 28 no. dwellings at Land at The Boweries, Barnham Road, Eastergate, PO20 3RT**

Our clients, The Church Commissioners for England, CEG and Hanbury Properties, own or control most of land in the Barnham Eastergate Westergate (BEW) strategic allocation, which is allocated in the Local Plan via Policy H SP2c SD5.

Our clients control the majority to land to the south of the Barnham Road and have been working in recent years with other landowners/promoters within the allocation and to the north of the Barnham Road to promote the BEW site through the Local Plan process as part of a consortium of landowners.

Local Plan Policy H SP2 requires strategic site allocations to be comprehensively planned. It is disappointing therefore that neither the landowner nor its agent has made any contact with the consortium prior to submission of this planning application to inform us of its intentions or share its emerging proposals with us.

Having reviewed the documentation, we object to the planning application in its current form for a number of reasons.

Firstly, whilst we do not anticipate that the realigned A29 route will pass through the application site, until West Sussex County Council's ongoing route selection process has concluded, it is our view that the determination of this application is premature. This is because there is risk, albeit it small, that it could prejudice delivery of the road and the wider allocation, which would undermine the plan-making process which para. 49(a) of the National Planning Policy Framework seeks to avoid. It would be preferable if proposals for this site were to come forward once the road layout has been confirmed and the wider BEW masterplan has advanced.

Second, we are concerned about the proposed access arrangements for which approval is being sought. The Site Layout Plan, which is not marked 'illustrative' or 'indicative' and has been submitted for approval, fails to demonstrate how the site will integrate with and connect to the wider BEW allocation. The proposed layout shows development turning its back on the wider BEW allocation via a cul-de-sac arrangement with inadequate linkages.

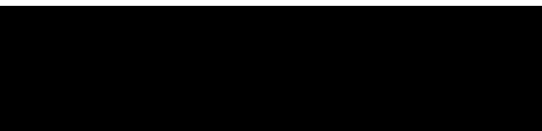
Third, it is important that pedestrian, cycle and roads are effectively planned for at this stage to connect with the existing and future networks that will emerge as part of the wider BEW masterplan. At this juncture, we are not convinced that the required visibility splays of 2.4m x 43m can be provided 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. Furthermore, as requested by West Sussex County Council, we agree that a speed survey to confirm that the existing 85<sup>th</sup> % speeds and a Road Safety Audit should be provided.

Fourthly, we note that West Sussex County Council raise concerns over the under-provision of car parking at the site. In having regard to the Arun District Council Parking Standards SPD (Table 1) and having reviewed the Census car ownership statistics for the Barnham Ward, we consider that taking into consideration the site location and current levels of local car ownership, we agree that the level of car parking proposed is considered insufficient. Whilst we are not suggesting that the applicant provides the absolute maximums according to policy, it is considered that a greater amount of car parking should be provided within the site to reduce the risk of overspill parking both within the site and onto the surrounding existing/future highway network

Lastly, it is essential that any development coming forward on this site pays its proportionate share of financial contributions towards infrastructure as detailed in Local Plan Policy H SP2c SD5 and supported by the Infrastructure Delivery Plan. This includes proportionate contributions towards education, healthcare, recreation, library and transport improvements, including the delivery of the realigned A29. It is essential that proposed developments within the BEW allocation contribute proportionally to their fair share of infrastructure costs for the wider site allocation.

We would be grateful if the Council would consider these matters with the applicant and engage with us at the suitable time regarding financial contributions and any proposed amendments.

Yours sincerely



**Stephanie Walker**  
Senior Planner

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