



West Sussex County Council

A29 PHASE 1

PLANNING STATEMENT





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PLANNING STATEMENT

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CONTENTS

1	INTRODUCTION	1
1.2	ACCOMPANYING DOCUMENTS	3
1.3	REPORT STRUCTURE	5
2	THE SITE AND SURROUNDING AREA	6
2.1	THE APPLICATION SITE	6
2.2	LAND USE DESIGNATIONS	7
2.3	SITE ACCESS AND RIGHTS OF WAY	7
2.4	LANDSCAPE DESIGNATIONS	7
2.5	HERITAGE	8
2.6	TREES AND HABITAT	8
3	PLANNING HISTORY & CONSULTATION & ENGAGEMENT	9
3.1	PLANNING HISTORY	9
3.2	CONSULTATION & ENGAGEMENT	10
4	THE PROPOSED DEVELOPMENT	12
4.2	AIMS OF THE PROPOSED SCHEME	13
4.4	THE PROPOSED SCHEME	14
5	PLANNING POLICY	18
5.1	INTRODUCTION	18
5.2	THE DEVELOPMENT PLAN	18
5.3	MATERIAL CONSIDERATIONS	21
6	PLANNING CASE	25

6.1	INTRODUCTION	25
6.2	PRINCIPLE OF THE DEVELOPMENT	25
6.3	HIGHWAYS AND SUSTAINABLE TRAVEL	30
6.4	DESIGN QUALITY	32
6.5	ENVIRONMENTAL CONSIDERATIONS	34
7	CONCLUSION	41

TABLES

Table 1-1 - Application Drawing Schedule	4
Table 3-1 – Relevant Planning Decisions	9

FIGURES

Figure 2-1 - Application Site Boundary	6
Figure 4-1 - Temporary Land and Civil Engineering	13
Figure 6-1 - C2C LEP Area and Priority Growth Locations including bognor Regis and the Enterprise Zone	28
Figure 6-2 - Allocated Housing Sites in the ALP	33
Figure 6-3 - Typical Cross Section Plan	34

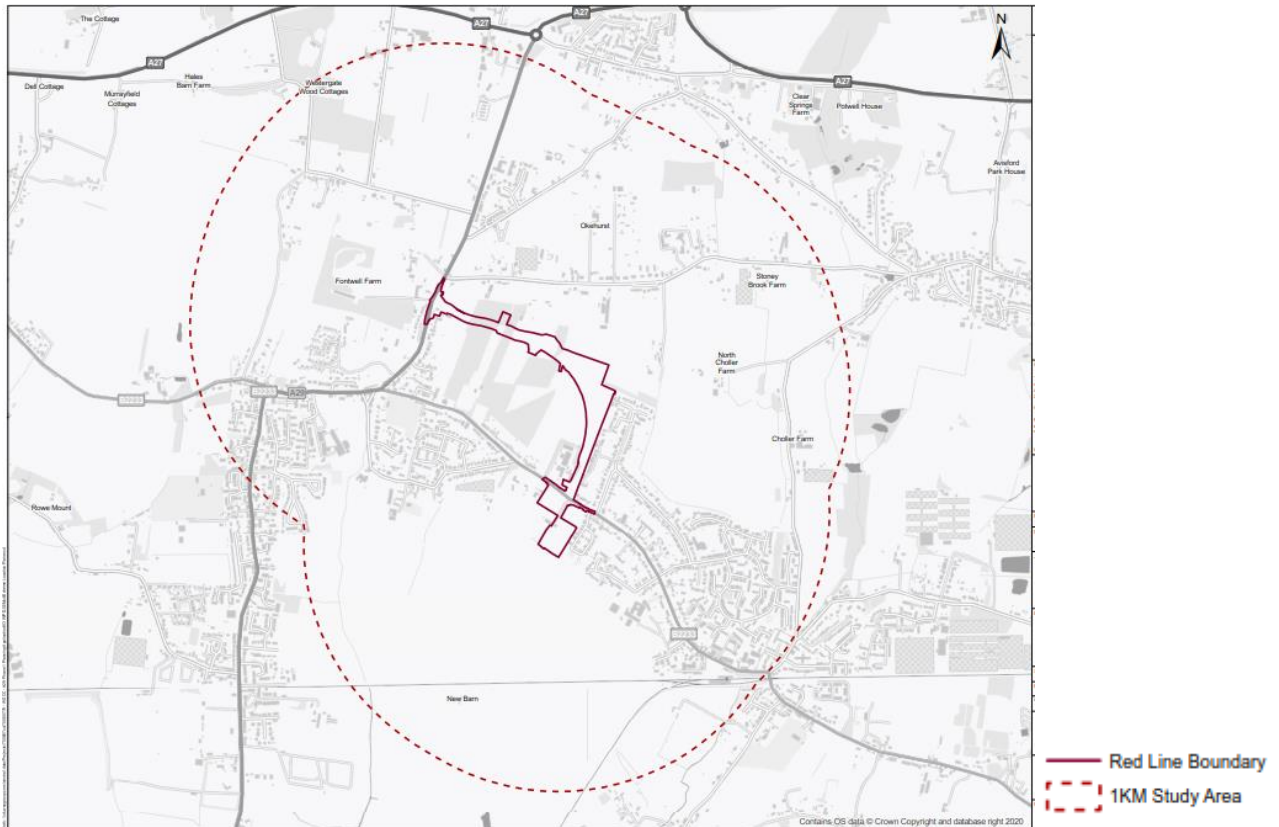
APPENDICES

Appendix A – Planning Policy
Appendix B – Minerals Safeguarding Statement
Appendix C – Aerodrome Safeguarding Statement
Appendix D – A29 Realignment Consultation Report
Appendix E – Road Safety Audit and Designers Response

1 INTRODUCTION

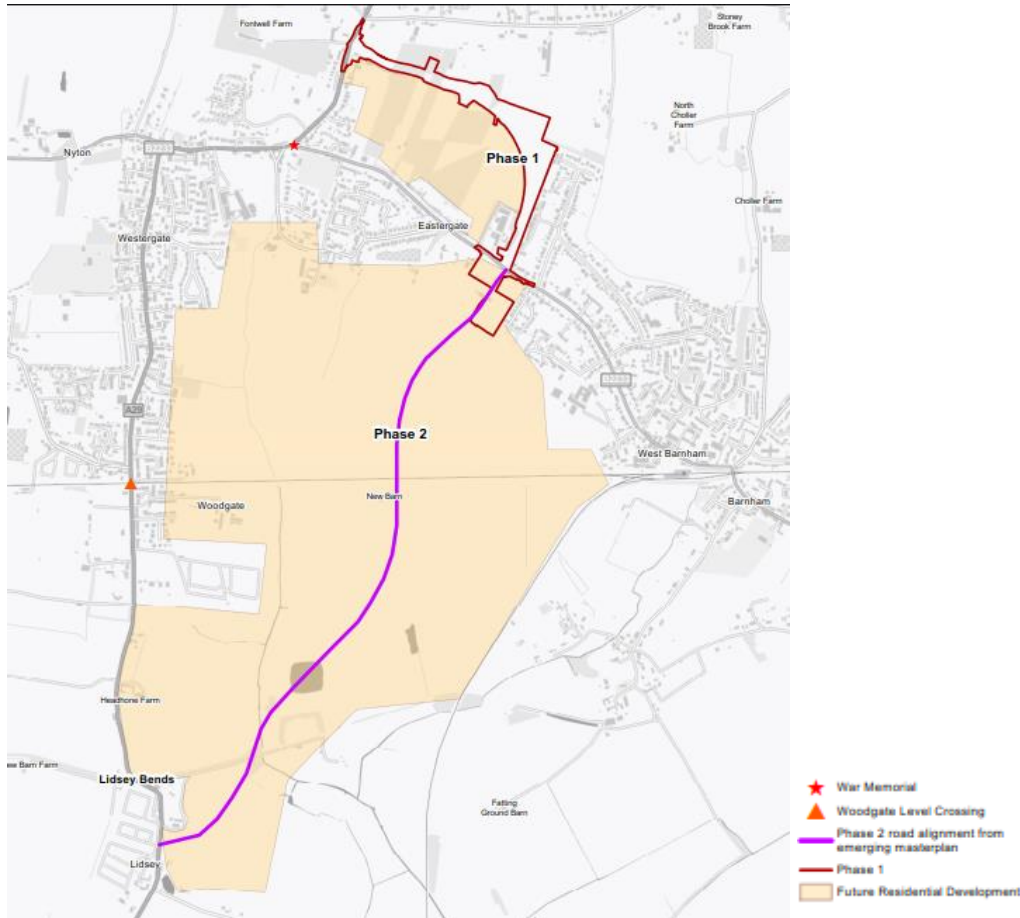
1.1.1. This Planning Statement has been prepared by WSP on behalf of West Sussex County Council (WSCC) (“The Applicant”) and accompanies a Planning Application including Environmental Statement (ES), for Phase 1 of the A29 Realignment Scheme (“the Proposed Scheme”) comprising the *“The construction of a 1.3km single carriageway with a 3m wide shared cycleway / footway, , one uncontrolled pedestrian crossing to enable users of the Public Right of Way to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and other associated works”* on land to the north of Eastergate and to the north west of Barnham, within Arun District, to the north of Bognor Regis. The location is shown in Figure 1-1.

Figure 1-1 – Location Plan



1.1.2. Phase 1 is the proposed northern section of the A29 Realignment Scheme. It would connect the A29 south of Eastergate Lane to the B2233 Barnham Road, west of Downfield Road. Phase 2 would be separately designed and consented and therefore, this Planning Application relates solely to Phase 1. The location of Phase 1 and Phase 2 is shown in Figure 1-2.

Figure 1-2 – Phase 1 and 2



- 1.1.3. The Planning Application will be submitted to West Sussex County Council as the determining Local Planning Authority (“LPA”) for Highway development, under Regulation 3 of The Town and Country Planning General Regulations 1992.
- 1.1.4. A full description of the Proposed Scheme is set out in Section 3 of this Statement and the location of the site is shown on the Site Boundary Plan drawing ref. no A29-CAP-HPN-00-DR-C-0174.
- 1.1.5. The Proposed Scheme represents an important part of WSCC’s strategy to support growth, development and housing in the Bogner Regis area. It will
 - Create capacity for expected traffic growth;
 - Enable the local road network to operate more efficiently by reducing congestion;
 - Improve the reliability of journey times; and
 - Tackle the planned and potential development to support the delivery of around 11,400 new dwellings and 104,000sqm of commercial development on permitted or planned development sites in this part of Arun District.
- 1.1.6. The Proposed Scheme will also support delivery of the LEP Strategic Economic Plan and Local Growth Deal.
- 1.1.7. This Planning Statement describes the need for the Proposed Scheme and how it fits into a wider strategy for the ambitious growth and development of housing in Barnham, Eastergate and

Westergate near Bognor Regis, and demonstrates that the Proposed Scheme aligns with national, regional and local strategic plans and policies and should be approved without delay.

1.2 ACCOMPANYING DOCUMENTS

- 1.2.1. This Planning Statement sets out the description of development for which planning permission is sought and explains how the Proposed Scheme responds to relevant planning policies contained in the statutory development plan. It also deals with site-specific technical issues to be dealt with through the planning process and draws from the conclusions of several environmental and technical documents which accompany the Planning Application.
- 1.2.2. The form and content of the Planning Application has been agreed through pre-application discussions with the LPA. The LPA have informally advised the Proposed Scheme would need Environmental Impact Assessment (EIA), and have provided a Scoping Opinion for the EIA, which was received on the 23 April 2019.
- 1.2.3. In addition to this Planning Statement, the supporting documents submitted to accompany the Planning Application comprise of the following:

Appended to the Planning Statement

- Planning Policy Table (Appendix A);
- Minerals Statement (Appendix B);
- Aerodrome Safeguarding Statement (Appendix C);
- A29 Consultation Report (Appendix D); and
- Stage 1 Road Safety Audit and Designers Response (Appendix E).

- 1.2.4. The Environment Statement (ES) which accompanies the planning application comprises the following chapters:

- Chapter 1 Introduction;
- Chapter 2 The existing site;
- Chapter 3 Description of Proposal;
- Chapter 4 Consideration of alternatives;
- Chapter 5 Approach to EIA;
- Chapter 6 Air quality;
- Chapter 7 Noise and vibration;
- Chapter 8 Transport and access;
- Chapter 9 Ecology and nature conservation;
- Chapter 10 Landscape and visual;
- Chapter 11 Water resources and flood risk;
- Chapter 12 Geology and soils;
- Chapter 13 Archaeology and heritage; and
- Chapter 14 Cumulative effects.

Appended to the Environmental Statement

- Site Clearance Plan (Appendix 3.1);
- Design drawings (Appendix 3.1);
- Green Infrastructure Strategy (Appendix 3.2);
- Landscape Strategy (Appendix 3.3);

- Arboriculture Report and Tree Protection Plan (Appendix 3.4);
- Outline Construction Environmental Management Plan (Appendix 3.5);
- Scope Report (Appendix 5.1);
- Scoping Opinion including email clarifications (Appendix 5.2);
- Air Quality and Dust Assessment (Appendix 6.1);
- Noise and Vibration (Appendix 7.1);
- Transport Assessment (Appendix 8.1);
- Walking, Cycling, Horse Riding Assessment Report (Appendix 8.2);
- Preliminary Ecological Appraisal (Appendix 9.1);
- Bat Survey Report Appendix 9.2);
- Badger Survey Report – Restricted (Appendix 9.3);
- Dormouse Survey Report (Appendix 9.4);
- Breeding Bird Survey Report (Appendix 9.5);
- Wintering Bird Survey Report (Appendix 9.6);
- Reptile Survey Report (Appendix 9.7);
- Great Crested Newt Survey Report (Appendix 9.8);
- Habitats Regulations Screening (Appendix 9.9);
- Biodiversity Net Gain Report (Appendix 9.10);
- Landscape and Visual Appraisal Methodology (Appendix 10.1);
- Lighting Assessment (Appendix 10.2);
- Planting Schedule (Appendix 10.3);
- Landscape Maintenance and Management Plan (Appendix 10.4);
- Flood Risk Assessment (Appendix 11.1);
- HEWRAT Assessment (Appendix 11.2);
- Watercourses Location Map (Appendix 11.3);
- Contaminated Land Preliminary Risk Assessment Report (Appendix 12.1);
- Archaeological Desk Based Assessment (Appendix 13.1);
- Geophysical Survey (Appendix 13.2);
- Archaeological Mitigation Strategy (Appendix 13.3);
- Written Scheme of Investigation (Appendix 13.4); and
- Long list of committed developments (Appendix 14.1).

1.2.5. A schedule of application drawings that form part of the Planning Application is set out in Table 1.1 below.

Table 1-1 - Application Drawing Schedule

Ref.	Title	Scale	Status
A29-CAP-HGN-00-DR-C-0174 S0-P04	Site Boundary Plan	1:1250@A1	For Approval
A29-CAP-HPN-00-DR-C-0132 S3-P05	Site Plan Sheet 1 of 5	1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0133 S3-P05	Site Plan Sheet 2 of 5	1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0134 S3-P05	Site Plan Sheet 3 of 5	1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0135 S3-P05	Site Plan Sheet 4 of 5	1:500@A1	For Approval

A29-CAP-HPN-00-DR-C-0136 S3-P04	Site Plan Sheet 5 of 5	1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0175 S0-P03	Plan & Profile Sheet 1 of 4	1:100/1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0176 S0-P03	Plan & Profile Sheet 2 of 4	1:100/1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0177 S0-P03	Plan & Profile Sheet 3 of 4	1:100/1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0178 S0-P04	Plan & Profile Sheet 4 of 4	1:100/1:500@A1	For Approval
A29-CAP-HPN-00-DR-C-0180 S0-P05	Cross Sections Sheet 1 of 3	1:2500@A1/As Shown	For Approval
A29-CAP-HPN-00-DR-C-0181 S0-P05	Cross Sections Sheet 2 of 3	1:2500@A1/As Shown	For Approval
A29-CAP-HPN-00-DR-C-0182 S0-P05	Cross Sections Sheet 3 of 3	1:2500@A1/As Shown	For Approval
A29-CAP-HPN-00-DR-C-0183 S0-P03	Proposed Elevations Noise Barrier Sheet 1 of 2	1:500/1:100@A1	For Approval
A29-CAP-HPN-00-DR-C-0184 S0-P03	Proposed Elevations Noise Barrier Sheet 2 of 2	1:500/1:100@A1	For Approval
A29-WSP-LA-GA-001 Rev G	Soft Landscape Plan Sheet 1 of 5	1:50 @A1	For Approval
A29-WSP-LA-GA-002 Rev G	Soft Landscape Plan Sheet 2 of 5	1:50 @A1	For Approval
A29-WSP-LA-GA-003 Rev G	Soft Landscape Plan Sheet 3 of 5	1:50 @A1	For Approval
A29-WSP-LA-GA-004 Rev G	Soft Landscape Plan Sheet 4 of 5	1:50 @A1	For Approval
A29-WSP-LA-GA-005 Rev G	Soft Landscape Plan Sheet 5 of 5	1:50 @A1	For Approval
A29-CAP-HDG-00DR-C-0047 Rev P08	Drainage Strategy Layout	1:1250@A1	For Approval

1.3 REPORT STRUCTURE

1.3.1. This Planning Statement is structured as follows:

- **Section 2** describes the Application Site and surrounding;
- **Section 3** describes how the Proposed Scheme has evolved and provides a detailed description of the development;
- **Section 4** lists relevant planning decisions relating to the application site;
- **Section 5** provides a summary of the relevant planning policy context;
- **Section 6** sets out the planning case, in particular, outlines how the Proposed Scheme responds to policy as well as other material considerations; and
- **Section 7** sets out the benefits of the Proposed Scheme and provides a summary and overall conclusion.

2 THE SITE AND SURROUNDING AREA

2.1 THE APPLICATION SITE

2.1.1. The Application Site is shown on the Application Site Boundary Plan drawing no. A29-CAP-HPN-00-DR-C-0174, and in **Figure 2.1**. It is approximately 11.8 hectares (ha) in size comprising 9.2ha of land for the Proposed Scheme and an additional 2.6ha of land for use temporarily for construction compounds and access, required to implement to Proposed Scheme.

Figure 2-1 - Application Site Boundary



2.1.2. From the northwest, the Application Site begins on the A29 Fontwell Avenue at its junction with Northfield Farmhouse and Eastgate Lane. It extends approximately 214m south west along the A29 Fontwell Avenue to a point opposite Westview, a detached residential property located on the east side of Fontwell Avenue and incorporating Folly Foot Farm. At this point, the Application Site extends approximately 818m south east over arable fields, woodland, orchard and areas of managed grassland where it abuts the north west boundary of the properties in Ewens Gardens.

- 2.1.3. At this point, the Application Site extends south west for a distance of approximately 549m, bordering the north western boundary of the properties in Murrell Gardens, and extending between the south eastern boundary of Fordingbridge Industrial Estate and the side boundary with Greenoaks, a detached property, until it joins the B2233 Barnham Road. At this point, the Application Site extends approximately 214m along the B2233 Barnham Road between the frontage of Fordingbridge Industrial Estate to the north west and its junction with Downview Road to the south east.
- 2.1.4. From the B2233 Barnham Road, the Application Site extends approximately 241m further south west over land currently occupied by Fleurie Nursery.
- 2.1.5. As mentioned above, the Application Site extends over arable fields, woodland, orchard and areas of managed grassland. The land is classified as having high quality agricultural land (Grade 1), however, an Agricultural Land Classification Assessment was not required as the principal for the Proposed Scheme in this location on agricultural land has already been established through the adopted local plan.

2.2 LAND USE DESIGNATIONS

- 2.2.1. The Application Site extends over the following land use designations as identified in the adopted Arun Local Plan (ALP) 2018:
- Built-up Area Boundary (Barnham);
 - Indicative Alignment of A29 Bypass (Policy T SP3 (k));
 - Site specific Strategic Housing Allocation SD5 (Barnham/Eastergate/Westergate – allocated 2,300 units); and
 - Sharp Sand and Gravel Minerals Safeguarding area.
- 2.2.2. The Application Site lies within the area boundary of Barnham and Eastergate Neighbourhood plan, and the vast majority of the site lies within Flood Zone 1, with the site boundary's eastern edge within Flood Zone 3.
- 2.2.3. The Application Site is also within 15km of an aerodrome (6.7km from Goodwood Aerodrome), and therefore an Aerodrome Safeguarding Statement has been prepared to support this Planning Application, in accordance with the WSCC Validation Local List (2017).

2.3 SITE ACCESS AND RIGHTS OF WAY

- 2.3.1. Currently the vehicular access to the Site is via farm tracks, and through private land owned by local residents, local farms and businesses.
- 2.3.2. Footpath 318, a north-south running public right of way (PRoW), crosses the site between the B2233 Barnham Road and Eastergate Lane.

2.4 LANDSCAPE DESIGNATIONS

- 2.4.1. The South Downs National Park is located approximately 1.4km north of the Application Site.
- 2.4.2. The Application Site also lies within National Character Area (NCA) 126 – South Coast Plain. This National Character Area is characterised by a flat, coastal landscape with an intricately indented shoreland and contains several major inlets.

- 2.4.3. WSCC's Landscape Character Assessment (2003) identifies the Application Site as part of Landscape Character SC8 Fontwell Upper Coastal Plain and is described as a transition area between the open lower Coastal Plain to the south and the wooded Downs to the north.
- 2.4.4. At a local level, the Application Site lies within the following landscape character areas and/or zones as identified in the Arun Landscape Study (2006):
- Zone 2 – Five Villages (Eastergate, Westergate, Walberton, Barnham, Yapton); and
 - LCA16: Fontwell-Eastergate Mosaic.

2.5 HERITAGE

- 2.5.1. There are no heritage designated assets within the Application Site. The Eastergate (Church Lane) and Eastergate Square Conservation Areas are located approximately 430m south-east of the Scheme and there are 26 listed buildings within 1km of the Site, which include Grade II* Parish of St George.

2.6 TREES AND HABITAT

- 2.6.1. A total of 19 trees and one tree group have been identified as being afforded protection by virtue of TPO BN/1/20. All of the individual trees are pedunculate oak whilst tree group G37 is recorded as comprising of a number of hornbeams. Features protected by TPO BN/1/20 are located towards the northernmost extent of the Scheme and on land east of Fontwell Avenue and south of Eastergate Lane.
- 2.6.2. There are also two potential veteran trees located on the eastern side of public footpath 318 and towards its northern end.
- 2.6.3. All tree locations are identified within the Tree Protection Plan included in Appendix 3.4 of the ES.
- 2.6.4. Much of the site is identified as priority habitat (traditional orchards and woodland) in the Priority Habitat Inventory (England) and Priority Habitat Network (England). Habitats of Principal Importance (HPI) are identified throughout the Site (specifically, traditional orchards and woodland).

3 PLANNING HISTORY & CONSULTATION & ENGAGEMENT

3.1 PLANNING HISTORY

3.1.1. This section lists the relevant planning decisions obtained from the West Sussex and Arun District Council (ADC) websites. The site's immediate surrounding area has had various outline approvals for primarily residential schemes, which have been taken into consideration in assessing the cumulative impact effects.

3.1.2. A full list of committed schemes is found in the ES. **Table 3.1** below lists those planning decisions located within 1.5km of the Application Site that are likely to affect nearby road network capacities.

Table 3-1 – Relevant Planning Decisions

Reference	Name of Committed Development	Status	Distance from Site	Proposal and Material Reviewed to Inform Assessment
2	Land East of Fontwell Avenue	Approved	0.6 km north	Outline application with some reserved matters to provide up to 400 new dwellings, up to 500 m ² of non-residential floorspace (A1, A2, A3, D1 and / or D2), 5000 m ² of light industrial floorspace (B1 (b)/(c)) and associated works including access, internal road network, highway network, highway works, landscaping, selected tree removal, informal and formal open space and play areas, pedestrian and cyclist infrastructure, car and cycle parking and waste storage. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=WA/22/15/OUT
4	Land at Former Eastergate Fruit Farm	Approved	0.3 km west	Outline application for the erection of 60 residential dwellings with new vehicular access, open space and other ancillary works at Land at former Eastergate Fruit Farm. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=EG/71/14/OUT
5	Pollards Nursery Lake	Approved	1.3 km south-east	Outline application with some reserved matters for development of up to 107 residential units (this application is a departure from the development plan) at Pollards Nursery Lake Lane. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=BN/16/12/
6	Land West of Westergate Street & East of Hook Lane	Approved	1.4 km south-west	Reserved matters application following outline planning permission AL/39/13 for the demolition of Oakdene and all other structures within the site and the erection of 79 dwellings, public open space, children's play areas, landscaping, drainage measures, sub-station, pumping

				station and all other associated works at Land West of Westergate Street & East of Hook Lane. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=AL/107/16/RES
7	Angels Nursery	Approved	1.3 km south-east	Application for 95 dwellings together with access, landscaping open space and associated works at Angels Nursery. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=BN/43/16/PL
8	Barnfield House	Approved	1.3 km north	Outline application with all matter reserved for residential development comprising of 22 developments involving demolition of Barnfield House and existing outbuildings. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=WA/23/17/OUT
9	Lillies	Approved	1.4 km south-east	Approval of reserved matters following outline consent BN/32/15/OUT relating to appearance, landscaping, layout and scale for erection of 38 dwellings including open space, landscaping and new access (resubmission following BN/28/17/RES) at Lillies. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=BN/6/18/RES
15	Land west of Fontwell Avenue	Undecided	0.2 km north	Demolition of existing structures and erection of 42 dwellings with access, parking, landscaping and associated works. https://www1.arun.gov.uk/PublicViewer/Authenticated/Main.aspx?user_key_1=BN/50/20/PL

3.2 CONSULTATION & ENGAGEMENT

- 3.2.1. WSCC consulted with the public and local stakeholders on the A29 Realignment Scheme in 2019 during preparation of the Outline Business Case, which considered both Phases 1 and 2. Full details of the consultation process and responses to comments received can be found in the 'A29 Realignment Consultation Report' which accompanies this Planning Application.
- 3.2.2. In summary, the consultation was promoted on the scheme webpage www.westsussex.gov.uk/A29Realignment and leaflets announcing the consultation were distributed to businesses and households within the scheme area. A press release was issued a week before public consultation began, announcing the proposals and promoting the exhibition events. Another press release was issued a week before the end of the consultation to encourage further participation.
- 3.2.3. Four public exhibition events were held across the following dates and locations:
- Barnham Community Hall 26 February 2019;

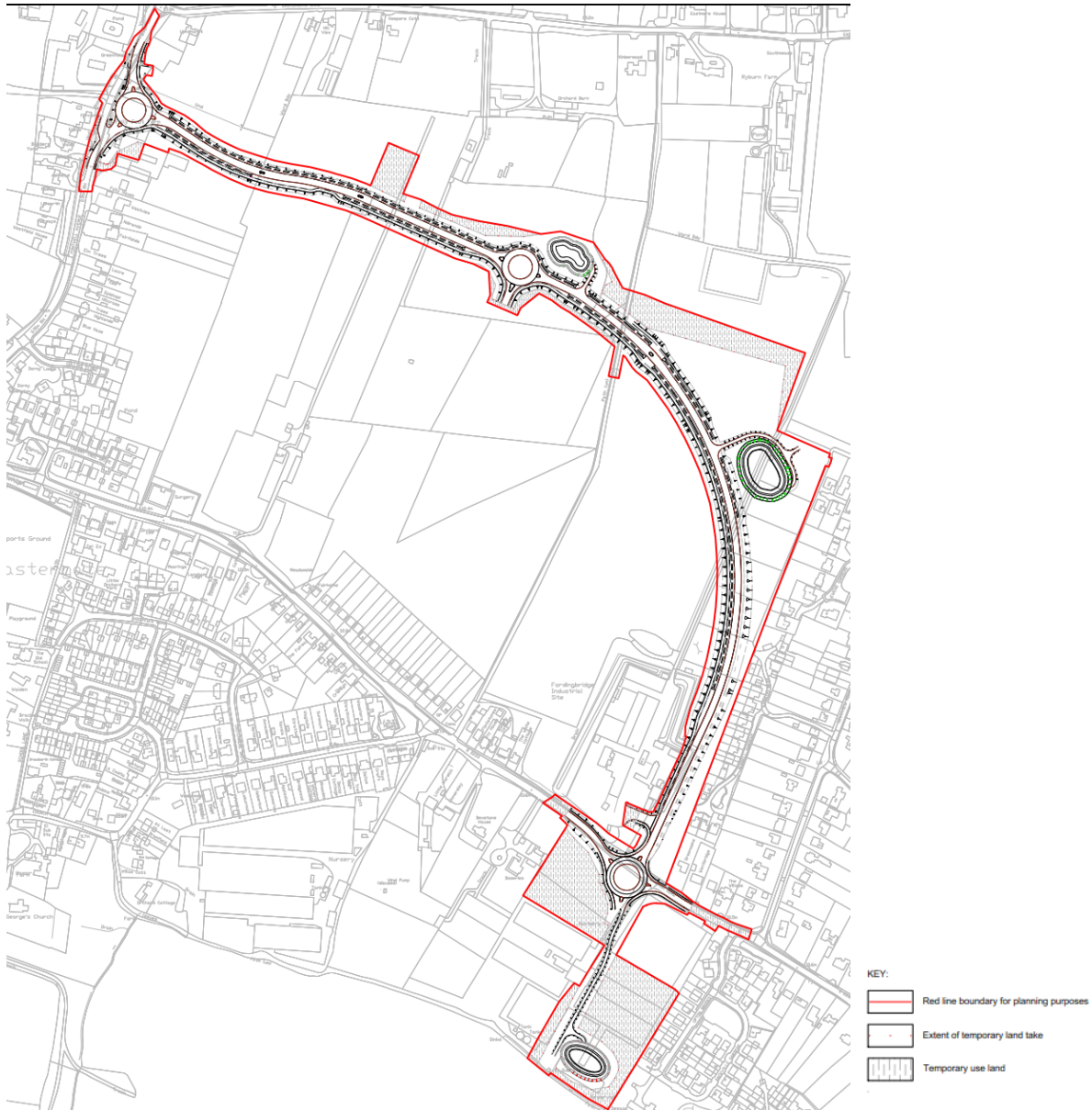
- Westergate Church Hill 27 February 2019;
- Eastergate Village Hill 28 February 2019; and
- St Philip Howard Catholic School 2 March 2019.

- 3.2.4. A consultation questionnaire was used to gather feedback on the design of the proposed road realignment, to identify local concerns and priorities in the development of the scheme and to find out more about how people travel in the area.
- 3.2.5. Stakeholders, businesses and local residents were encouraged to provide their feedback on the proposals. The level of response is as follows:
- A total of 518 responses were received.
 - These included 488 questionnaires and 30 written responses (letters, emails) received by post or email.
 - A total of 958 people attended the public exhibitions.
- 3.2.6. The key findings of the consultation found:
- Questionnaire respondents have concerns about many aspects of the proposed A29 Realignment scheme, in particular:
 - 90% are concerned about disruption during construction
 - 89% are concerned about the impact on existing residential properties
 - 87% are concerned about noise, light or air pollution
 - 87% are concerned about impact on landscape and scenery
 - 85% are concerned about congestion and journey time
 - 84% are concerned about road safety
 - 82% are concerned about impact on routes used by people walking, cycling and horse riding
 - When asked to give more detail about local issues that should be considered in the development of the scheme, many respondents took the opportunity to demonstrate objection to the scheme in general including the housing development. They also raised concerns that the proposed scheme will result in localised increases in traffic and congestion, and that it will impact on the identity of local villages.
 - With regard to Phase 1 (North) design proposals:
 - Respondents are mostly concerned about potential traffic conflicts on Barnham Road, Fontwell Avenue and Fontwell roundabout.
 - Respondents have suggested realigning the northern link to the A27 at Fontwell or moving it away from Eastergate Lane junction.
 - Other suggestions included the need for greater provision for non-motorised users, including dedicated and segregated pathways and crossing provision. The need for traffic lights at roundabouts in the northern section was also mentioned.
- 3.2.7. The information relating to Phase 1 gathered from this consultation was considered alongside other technical assessment information to develop the preferred option scheme for which planning permission is being sought.

4 THE PROPOSED DEVELOPMENT

- 4.1.1. This section provides a description of the Proposed Scheme and describes how the design has evolved to the preferred option'. It should be read in conjunction with ES Chapter 3 Description of Scheme.
- 4.1.2. Planning permission is sought for:
- 4.1.3. *“The construction of a 1.3km single carriageway with a 3m wide shared cycleway / footway, , one uncontrolled pedestrian crossing to enable users of the PRow to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and other associated works”*
- 4.1.4. The realignment of the A29 (Phases 1 & 2) will create capacity for expected traffic growth and will tackle planned and potential development to support the delivery of around 11,400 new dwellings and 104,000sqm of commercial development on permitted or planned development sites in this part of Arun District.
- 4.1.5. The extent of land required to deliver the Proposed Scheme is set out in Figure 4.1 below. It comprises a combination of permanent and temporary land. Post construction, the temporary land areas will be made good and returned to its current use as open green fields.

Figure 4-1 - Temporary Land and Civil Engineering



4.2 AIMS OF THE PROPOSED SCHEME

- 4.2.1. The primary aims of the A29 Realignment Scheme (Phase 1 and Phase 2) of which the Proposed Scheme forms a part, are:
- To support delivery of the Strategic Economic Plan and the Local Plan by enabling the delivery of new homes and jobs; and
 - To improve journey times on the A29 by avoiding the Woodgate level crossing, Lidsey bends and the A29/B2233 War Memorial Junction.
- 4.2.2. The A29 Realignment Scheme aims to alleviate issues raised in the West Sussex Transport Plan 2011-2026 (WSTP) including transport issues being a deterrent to visitors and businesses located in the Arun District. This has contributed to poor economic performance in Bognor Regis relative to the rest of West Sussex and the wider region.

- 4.2.3. Significant new housing is planned in the area which is expected to increase demand on the A29 and B2233 roads. An application for up to 500¹ homes on the land to the east of Fontwell Avenue is required to deliver a proposed 2,300 homes at the Barnham, Eastergate, Westergate Site during the ALP period (2011-2031), with potential on the Site for a further 700 dwellings to be delivered after 2031 (refer to Figure 1-1). This site allocated for housing would be contrary to the provisions of the National Planning Policy Framework (NPPF) regarding “severe residual cumulative impact” (NPPF Para 109) without the delivery of the A29 realignment scheme, based on the Arun District Local Plan Transport Study 2017.

4.3 DESIGN DEVELOPMENT

- 4.3.1. Several feasibility and viability studies to inform the Proposed Scheme were undertaken since 2012. The main studies were:
- Parsons Brinckerhoff - A29 Woodgate Study, 2012;
 - MVA (now Systra Ltd) - A29 Realignment Viability Study, 2013; and
 - Systra - A29 Realignment Feasibility Study, 2014.
- 4.3.2. Since the last study in 2014, ADC and WSCC continued to work with developers to prepare a Masterplan vision for the area to allow the land to be opened up for housing, schools, and other uses.
- 4.3.3. Building upon the 2014 Systra Report, an Option Summary Table was prepared focusing on the advantages and disadvantages of the options considered in previous studies. These options were then taken to consultation with stakeholders who, along with further traffic modelling, determined that Phase 1 (Route 6) and Phase 2 (Part D and 12) was the most appropriate options that would deliver WSCC’s aims and aspirations for this area.

4.4 THE PROPOSED SCHEME

- 4.4.1. Full details of the Proposed Scheme (Phase 1 only) are shown on the Site Layout Plan drawing nos. A29-CAP-HPN-00-DR-C-0132 to – 0136 (consec). The topography within the Site varies between 8 and 16 metres above ordnance datum (m AOD). The existing ground profile in general falls from Fontwell Avenue towards Barnham Road. The proposed levels are shown on the A29 Link Road Plan & Profile drawing no. A29-CAP-HPN-00-DR-C-0175 to -0178 (consec).
- 4.4.2. From the northwest, the Proposed Scheme commences with a three-arm roundabout at a new junction with the A29 Fontwell Avenue, as shown on drawing no. A29-CAP-HPN-00-DR-C-0132. The new road itself will have an average width of 7.3m and finished in asphalt. Uncontrolled pedestrian crossings are proposed at the northern and eastern arms, a grass verge is proposed for most of the western length, and footways are proposed along the north and south eastern arms, of this new roundabout.
- 4.4.3. From this new roundabout, the new 7.3m carriageway extends south east to join another three-arm roundabout, as shown on drawing no. A29-CAP-HPN-00-DR-C-0133. This new roundabout will

¹ Barnham Road, Eastergate Environmental Impact Assessment Scoping Report BDW, (Wyg, November 2019).

provide future access to the Barrett Homes housing site. An attenuation pond 1m below existing ground level (EGL) with an approximate volume of 400m³ is proposed to the east of this new roundabout. An access road to the attenuation pond is also proposed. The attenuation pond will be required to store and control the flow of excess drainage, surface water and stormwater. Water is then slowly released from the attenuation pond or solution in a controlled manner.

- 4.4.4. The new carriageway will continue south east to a point where it will provide an uncontrolled pedestrian crossing to enable users of the PRow to cross the carriageway, also shown on drawing no. A29-CAP-HPN-00-DR-C-0133. After, the new carriageway will bend and head in a south westerly direction, as shown on drawing no. A29-CAP-HPN-00-DR-C-0134. Another attenuation pond, also 1m below EGL but with an approximate volume of 900m³, and associated access road, are also proposed on land east of the new carriageway and north west (rear) of 31A and 31B Ewens Gardens, two detached residential dwellings.
- 4.4.5. The new carriageway will extend south west boarding the north western boundary of the properties in Murrell Gardens, extending between the south eastern boundary of Fordingbridge Industrial Estate and the side boundary with Greenoaks, a detached property, until it joins a new four-arm roundabout at a new junction with the B2233 Barnham Road, as shown on drawing no. A29-CAP-HPN-00-DR-C-0135. This new roundabout will comprise 3no. uncontrolled pedestrian crossings on its north, east and southern arms; a combination of 3m wide shared footway/cycle ways and/or 2m wide footways at the northern and eastern arms; a grass verge for most of the western length, and footways along the north and south eastern arms. A new access is proposed into the Fordingbridge Industrial Estate from the new section of carriageway proposed north of the B2233 Barnham Road. The Proposed Scheme will tie into the A29 Fontwell Avenue to the north west and the B2233 Barnham Road to the south west.
- 4.4.6. The majority of the new carriageway will be built upon a small embankment to avoid road construction within areas of high groundwater levels. Drainage swales, filter drains and a grass filter strip are proposed adjacent to the carriageway to catch and filter 'over the edge' surface runoff. Key features of the Proposed Scheme include the following; some of which are discussed in more details below:
- Planters at certain points along the carriageway;
 - Engineering earthworks, 5m grassed verges with 4m Swales;
 - Landscaped areas at certain points along the carriageway;
 - 3m wide shared footways;
 - 2m wide footways; and
 - Street lighting not exceeding 10m high at roundabout approaches.
- 4.4.7. Typical sections of the proposed new carriageway layout are shown on the Cross Sections drawing nos. A29-CAP-HPN-00-DR-C-0180 to -0182 (consec).
- 4.4.8. Beyond the B2233 Barnham Road, the new carriageway will link onto a temporary haulage road over land currently occupied by Fleurie Nursery. This temporary road will provide access to a works compound (Compound A) comprising main site offices, staff parking, meetings, contract admin, and welfare. It will also provide access to an attenuation pond, also 1m below EGL with an approximate volume of 900m³, and its future access road.
- 4.4.9. Two further construction compounds are proposed, all of which will be in-situ for the entire duration of the construction works:

- Compound B – just off A29 Fontwell Avenue. This will provide localised staff parking, welfare and some plant and materials.
- Compound C – halfway along the Proposed Scheme adjacent to Pond 3, offline from the new carriageway alignment. This is for storing topsoil and other materials.

4.4.10. Once constructed the realigned section of A29 would be subject to a 30mph speed limit.

Operational access and movement

- 4.4.11. There are two proposed access routes for the Site, both of these would be used for the Proposed Scheme. The access route at the western end will join Fontwell Avenue, which runs north-to-south along the western side of the Site. The other access route will join the B2233 Barnham Road which runs east-to-west along the southern side of the Site.
- 4.4.12. Traffic from the existing A29 route will use the A29 Realignment route (both phases), alleviating pressure on the surrounding transport network. Residents from the new Barrett Homes housing scheme will also utilise the Proposed Scheme in the operational phase (there will also be access to the new housing development directly from Barnham Road).
- 4.4.13. The Proposed Scheme will include a new access to the Fordingbridge Industrial Estate, north of the roundabout on Barnham Road.
- 4.4.14. Non-motorised users will be able to use the Proposed Scheme via a 3m wide footpath/ cycleway (Shared Use Path) along the entire length of the Scheme. An uncontrolled pedestrian crossing is incorporated into the road design to enable users of the PRow to safely cross the carriageway. The Shared Use Path will connect to existing PRow adjacent to the Site.

Proposed levels and elevations

- 4.4.15. Street lighting at the junctions will be the tallest feature associated with the Proposed Scheme. These are most likely to be 6-8m in height and will not exceed a maximum height of 10m (allowing for raised foundations).

Proposed excavation extents

- 4.4.16. The only area of new carriageway that will be in cutting is at the north west end with A29 Fontwell Avenue, as shown on the 'A29 Link Road Plan & Profile drawing no. A29-CAP-HPN-00-DR-C-0175, before being on slight embankment for the remainder of the Proposed Scheme. Cutting depths are currently envisaged to be up to 2m. Highway gradients have been set to minimums (or just above minimum) to minimise fill above ground levels.
- 4.4.17. Drainage swales are proposed adjacent to the carriageway – in these areas the road surface runoff is “over the edge” into the swales. A grass filter strip is also proposed between the future carriageway and the proposed swales. Due to the relatively impermeable nature of the ground, pipes are proposed to generally run under the swales to convey the higher critical design storm flows. Infiltration crates are proposed within and adjacent to the proposed Barnham Road roundabout.
- 4.4.18. Excavations for drainage will be up to 1.7m from the adjacent new road finished level, and for utilities and substation relocation up to 1.5m.

Noise Barrier

- 4.4.19. A noise barrier is located on the eastern side of the Proposed Scheme running between the new road alignment and the properties on Murrell Gardens, as shown on the Proposed Elevations Noise Barrier drawing nos. A29-CAP-HPN-00-DR-C-0183 and -0184 (consec). The barrier is 3m high,

approximately 440m long, and compose absorptive materials to reduce noise onto the existing properties in Murrell Gardens.

Electricity Sub-Station

- 4.4.20. The existing electricity substation at Fontwell Avenue will be demolished, and a new replacement substation will be relocated on land east of the new roundabout at the A29 Fontwell Avenue. It will measure approximately 4m by 4.5m, with an adjoining cable area approximately 3m by 4m. On the north side of the substation will be a parking area approximately 3m by 8m. A grasscrete area is proposed in front of the substation to enable vehicles to reverse off Fontwell Avenue.

Landscaping

- 4.4.21. The aims of the landscape proposals are to improve biodiversity, provide screening for a noise barrier and to enhance legibility and connectivity. The proposals sit within the broader overarching principles outlined in the A29 Green Infrastructure Strategy (2020) (Appendix 3.2 to the ES).
- 4.4.22. Within the scheme the following plant mixes have been proposed: Orchard, woodland edge, woodland core, scrub, native hedgerow, wildflower meadow, amenity grass, wetland grass. These mixes provide 26 native tree and scrub species and 31 native species of grass and wildflower, providing a large benefit to biodiversity, and creating a visually attractive area along the proposed footpath and road.
- 4.4.23. An approximate area of 0.72 hectares will be given to woodland planting, benefiting carbon capture for the site.
- 4.4.24. Where feasible the landscape design has connected neighbouring existing vegetation with proposed vegetation to create wildlife green corridors through the site. The planting mixes contain a variety of fruiting trees which should provide food for wildlife along these corridors.

5 PLANNING POLICY

5.1 INTRODUCTION

- 5.1.1. This section sets out the planning policy context for the A29 Realignment Scheme of which the Proposed Scheme forms part of. We first consider the Development Plan policies comprising the ALP 2018 and the Barnham and Eastergate Neighbourhood Plan 2014. We then consider the national planning policy as set out in the National Planning Policy Framework (NPPF) (revised 2019) and the West Sussex Transport Plan 2011 – 2026.

5.2 THE DEVELOPMENT PLAN

Arun Local Plan 2011-2031 (adopted July 2018)

- 5.2.1. The ALP 2011-2031 was adopted on 18th of July 2018. It sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011- 2031. The ALP 2018 is used to guide decisions on planning, development and regeneration activity over this period including many other decisions shaping corporate investment plans and strategies, as well as those from external providers, delivering services and infrastructure to the local community.

A full list and text of all relevant policies are contained in Appendix A of this Statement. In summary, the main relevant policies are:

- Policy C SP1 (Countryside) - *“Development will be permitted in the countryside where it is for road and/or cycle schemes”*
- Policy SD SP1 (Sustainable Development) – *“the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework”.*
- Policy SD SP1a (Strategic Approach) – *“To maintain the District’s unique character as a coastal location set against the South Downs whilst ensuring that the needs of the community are met through sustainable growth and the provision of suitable services, the spatial strategy for Arun District to 2031 is to;*
 - c. provide for growth of the sustainable villages whilst maintaining their setting within the open countryside*
 - e. provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure”*
- Policy GI SP1 (Green Infrastructure and Development) – *“All major development must be designed to protect and enhance existing Green Infrastructure assets, and the connections between them, in order to ensure a joined up Green Infrastructure Network. The Green Infrastructure Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.”*
- Policy LAN DM1 (Protection of Landscape Character) – *“Development within the setting of the South Downs National Park must have special regard to the conservation of that setting,*

including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.”

- Policy D SP1 (Design) – *“All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.”*
- Policy D DM1 (Aspects of Form and Design Quality) – *“When considering any application for development the Council will have regard to the following aspects; ‘Character’, ‘Appearance/attractiveness’, ‘Impact’, ‘Innovation’, ‘Adaptability’, ‘Trees & Woodland’, ‘Public Realm’, Layout: movement & legibility”*
- Policy T SP1 (Transport and Development) – *“To ensure that growth in the District strengthens Arun's economic base, reduces congestion, works to tackle climate change and promotes healthy lifestyles; the Council will ensure that development:*
 - *provides safe access on to the highway network;*
 - *contributes to highway improvements and promotes sustainable transport,*
 - *includes public transport improvements and the cycle, pedestrian and bridleway network.”*
- Policy T SP3 (Safeguarding the Main Road Network) – *“To ensure that improvements necessary to enhance the strategic and supporting road network within the District can be carried out, the lines of major road schemes, as shown on the Policies Map, will be protected from development as follows:*

Safeguard the indicative lines of the following schemes, to support the delivery of planned growth through the Local Plan. These schemes are subject to design, consultation and approval:

 - j. A29 realignment (southern tie-in)*
 - k. A29 realignment (northern tie-in)”*
- Policy T DM1 (Sustainable Travel and Public Rights of Way) – *“New development must ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified. Access to alternative modes of transport including public transport services, the public right of way and cycle networks, must be available and accessible to all members of the community”*
- Policy LAN DM1 (Protection of Landscape Character) – *“Development within the setting of the South Downs National Park must have special regard to the conservation of that setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.”*
- Policy QE DM1 (Noise Pollution) – *“Developers proposing new noise generating development must seek advice from an early stage to determine the level of noise assessment required. Proposals will need to be supported by evidence to demonstrate that there are no suitable alternative locations for the development.”*

- Policy QE DM2 (Light Pollution) – *“Planning permission for proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications. Outdoor lighting schemes will be considered against the following criteria:*
 - a. *No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation;*
 - b. *Light levels being the minimum required for security and working purposes;*
 - c. *Minimising the potential glare and spillage; and*
 - d. *The degree to which outdoor lighting can be powered by on-site renewable sources.”*
- Policy QE DM3 (Air Pollution) – *“All major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts by:*
 - b. *Maximising provision for cycling and pedestrian facilities;*
 - d. *Contributing towards the improvement of the highway network where the development is predicted to result in increased congestion on the highway network.”*
- Policy QE SP1 (Quality of the Environment) – *“The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity [and] the natural environment”*
- Policy HER SP1 (The Historic Environment) – *“The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District”*
- Policy HER DM6 (Sites of Archaeological Interest) – *“There will be a presumption in favour of the preservation of scheduled and other nationally important monuments and archaeological remains.”*

Barnham and Eastergate Neighbourhood Development Plan 2014-2029

- 5.2.2. The Barnham and Eastergate Neighbourhood Development Plan 2014-2029 (BENP) sets out the local vision for the villages of Barnham and Eastergate, together with policies and objectives for achievement of this vision. The Application Site is included within the spatial coverage of this Plan.
- 5.2.3. As with the ALP, a full list and text of all relevant policies are contained in Appendix A of this Statement. In summary, the main relevant Neighbourhood policies are:
- GA2 (Footpath and cycle path network) – *“Support will be given to proposals that improve and extend the existing footpath and cycle path network, allowing greater access to new housing, the village centres, green spaces and the open countryside.”*
 - ES5 (Quality of design) – *“All new development with the parishes should be of a high quality design and will be expected to conform to the forthcoming Barnham and Eastergate Design Guide once it has been adopted as supplementary planning guidance in accordance with paragraph 1.41 of the Local Plan.”*

- ES1 (Flooding, drainage and new development) – *“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”*

5.3 MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 5.3.1. A revised NPPF was published in February 2019 and contains the Government’s current national planning policies. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 5.3.2. Section 2 – ‘**Achieving sustainable development**’, Paragraph 8 states *“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- **An economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - **A social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - **An environmental objective** – *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*
- 5.3.3. At the heart of the NPPF is a presumption in favour of Sustainable Development. Paragraph 10 states *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”.*
- 5.3.4. Paragraph 11 indicates that *“plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means approving development proposals that accord with an up-to-date development plan without delay.”*
- 5.3.5. Regarding the status of the Development plan, Paragraph 12 advises that the *“presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart*

from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”

- 5.3.6. At Section 4 ‘**Decision-making**’, the NPPF advises Local planning authorities at Paragraph 38 that they *“should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”*
- 5.3.7. On determining applications, Paragraph 47 advises that *“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.”*
- 5.3.8. At Section 6 ‘**Building a strong, competitive economy**’, Paragraph 84 states *“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*
- 5.3.9. Section 9 sets out the Government’s policies on ‘**Promoting sustainable transport**’. Paragraph 102 states *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- *the potential impacts of development on transport networks can be addressed;*
 - *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - *opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*
- 5.3.10. Paragraph 104 states that *“Planning policies should:*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
 - c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; and*

d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking.”

- 5.3.11. In considering development proposals, the Government advises Local Planning Authorities at Paragraph 109 that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”*
- 5.3.12. Furthermore, Paragraph 110 states *“Within this context, applications for development should:*
- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*
- 5.3.13. Section 12 of the NPPF relates to **‘Achieving well-designed places’** and states at Paragraph 124 that *“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*
- 5.3.14. Paragraph 128 advises that *“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”*
- 5.3.15. Paragraph 130 indicates that *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).”*

5.3.16. Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at Paragraph 189 that *“describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*

West Sussex Transport Plan 2011-2026

5.3.17. The West Sussex Transport Plan 2011-26 (LTP3) sets the strategy for guiding future investment in our highways and transport infrastructure. It also sets a framework for considering transport infrastructure requirements associated with future development across the county.

5.3.18. The Plan includes four strategies that guide our approach to maintaining, managing and investing in transport and for meeting our main objective of improving the quality of life for West Sussex residents:

- Promoting economic growth;
- Tackling climate change;
- Providing access to services, employment and housing; and
- Improving safety, security and health.

5.3.19. Paragraph 2.2.1 (Implementation Plan for Arun) sets out the transport strategy for Arun. It states “To ensure that the regeneration aspirations of the coastal plain are delivered, and the identified transport issues are addressed we will ensure that all new schemes and developments contribute, and support, in some way to the following:

- Increasing use of sustainable modes of transport;
- Improving network efficiency in order to improve journey times and air quality;
- Improving safety for all road users;
- Discouraging HGVs from using unsuitable roads; and
- Improving accessibility between communities within the District.

5.3.20. Paragraph 2.2.2 (Key Issues and Aims) highlights the problem of road congestion during peak periods on the A29, disrupting journey times and causing poor air quality. The plan notes that traffic travelling along the A29 (to access Littlehampton, Bognor Regis and the coastal area) is often delayed due to the level crossing at Woodgate which also creates congestion and poor air quality. The aim therefore is to *“Develop opportunities through new development that will improve the access along the A29, including the potential to bridge the railway level crossing at Woodgate”*.

5.3.21. The A29 realignment scheme (Phases 1 and 2) would allow traffic to avoid the level crossing at Woodgate and therefore improve delays and journey times.

5.3.22. The A29 realignment scheme is also listed as a major highway project on WSCC’s online website.

6 PLANNING CASE

6.1 INTRODUCTION

- 6.1.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This section identifies the main planning considerations arising from the development plan applicable to this planning application as well as the material considerations warranting the grant of planning permission for the Proposed Scheme.
- 6.1.2. In the context of the consideration of the main effects of the Proposed Scheme, the main planning and environmental considerations are:
- Principle of the Development;
 - Highways and Sustainable Travel;
 - Design Quality; and
 - Environmental Considerations

6.2 PRINCIPLE OF THE DEVELOPMENT

- 6.2.1. At present, the current A29 route suffers from the following existing problems:
- Congestion - during the peak periods, notably at the Woodgate level crossing and War Memorial junctions;
 - Journey time unreliability - at busy times, journey times can vary considerably during peak periods, making it difficult for road users to predict the time needed for their journeys; and
 - Road Accidents – experienced along the entire A29 route particularly at locations such as the Lidsey Bends.
- 6.2.2. Even in the absence of planned development, background traffic growth will make existing congestion problems worse, but without mitigation, the level of traffic generated by the planned development would exacerbate these issues. The Proposed Scheme has been identified as a key component of the Strategic Infrastructure Package to support the ALP and ensure that impacts are satisfactorily mitigated.
- 6.2.3. Overwhelming policy support at all levels exist which establishes the principle of the Proposed Scheme. This is discussed below.

National Policies

NPPF

- 6.2.4. As mentioned in the preceding section, Section 2 of the NPPF '**Achieving sustainable development**' sets out the government's overarching Economic, Social and Environmental objectives to achieve Sustainable Development'. The Proposed Scheme is considered to constitute sustainable development as it will help to deliver these objectives. In particular:

An economic objective – the Proposed Scheme will to help build a strong, responsive and competitive economy, as it will provide infrastructure that will support growth in the local area;

A social objective – the Proposed Scheme will provide infrastructure to support the building of new homes that will create new, vibrant and healthy communities; and

An environmental objective – the Proposed Scheme will make effective use of land. It will also help to improve biodiversity as the Proposed Scheme will result in a Biodiversity Net Gain.

- 6.2.5. Also relevant is Section 6 **‘Building a strong, competitive economy’**. The Proposed Scheme will support local economic growth and create conditions in which businesses can invest, expand and adapt.

National transport objectives

- 6.2.6. The national transport objectives, set by government, are:

- To ease congestion and provide upgrades on important national, regional or local routes;
- To unlock economic and job creation opportunities; and
- To enable the delivery of new housing developments.

- 6.2.7. The A29 Realignment Scheme of which the Proposed Scheme forms part of, will contribute to these objectives.

Moving Britain Ahead – the Government’s Transport Investment Strategy (TIS)

- 6.2.8. The government’s strategy for transport investment, published in July 2017, sets out the case for continued investment in Britain’s transport infrastructure. Through this investment, the government seeks to:

- Create a more reliable, less congested, and better-connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

- 6.2.9. The A29 Realignment Scheme of which the Proposed Scheme forms part of, will reduce congestion and will help create a better connected, more reliable transport network for those who depend on it.

- 6.2.10. It will also help to support local economic growth, development and connectivity, making Bognor Regis more attractive to investment, and will connect planned employment and housing development to markets and jobs.

The Road Investment Strategy (RIS) 2015/16 to 2019/20

- 6.2.11. The RIS sets the following:

- Highlight the need for a national network of modern roads that meets social, economic and environmental aspirations;
- Aims to achieve a network in 2040 that will be smoother for connecting people and businesses to support economic growth;
- Providing capacity and connectivity to support national and local economic activity to combat congestion; and
- Connecting communities and providing flexible travel.

- 6.2.12. The A29 Realignment Scheme of which the Proposed Scheme forms part of, will complement the RIS by increasing capacity, reducing congestion, supporting economic growth, and improving connectivity between the Strategic Road Network (SRN) and Bognor Regis.

The National Infrastructure Delivery Plan (2016 – 2021)

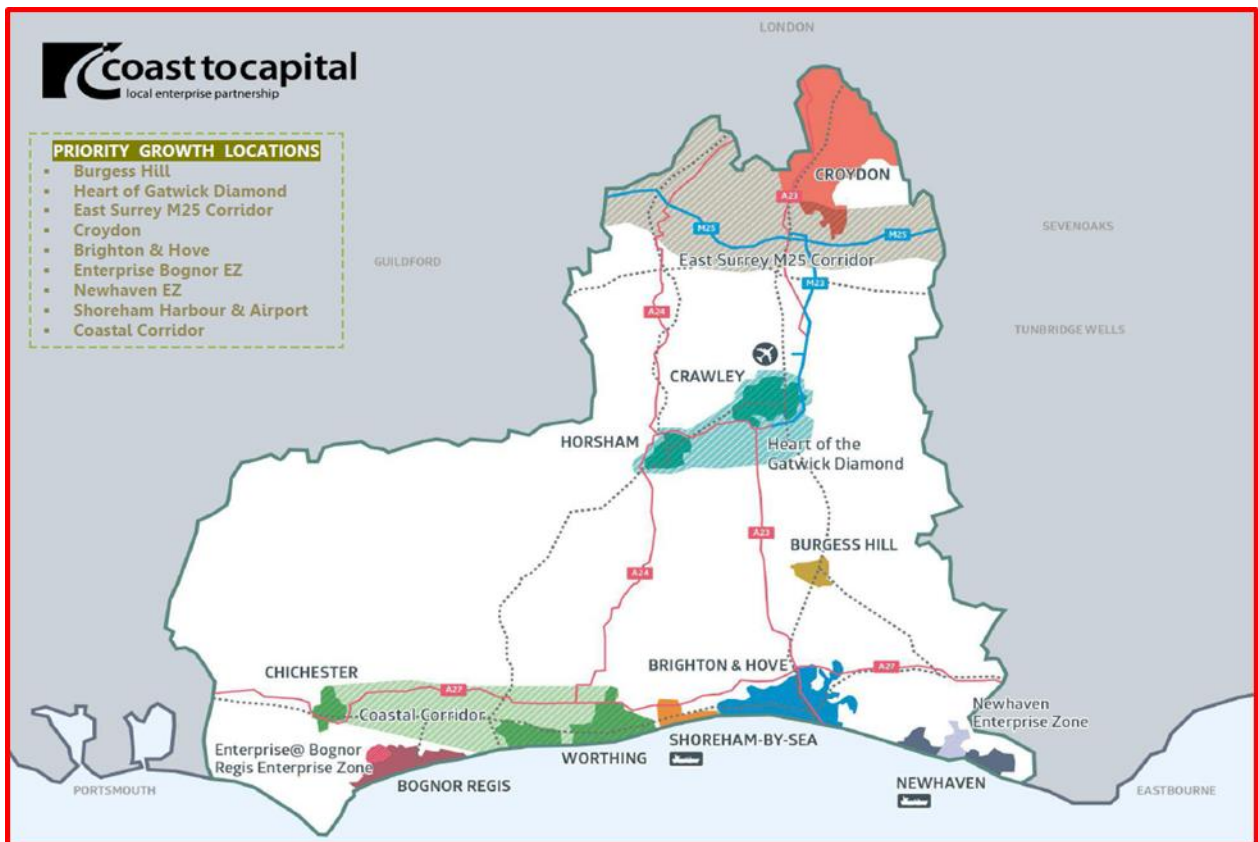
- 6.2.13. This was published in March 2016, and:
- Outlines the Government's plans for economic infrastructure over the five-year plan period to support the delivery of housing and social infrastructure;
 - Outlines the Government's commitment to providing a step change in the capacity of the SRN; and
 - States that local roads are a crucial element of the transport system, and that their maintenance and improvement is the responsibility of Local Authorities.
- 6.2.14. The A29 Realignment Scheme of which the Proposed Scheme forms part of, will connect the national Strategic Road Network (SRN), the A29, to major local roads and to the proposed land allocations at Barnham, Eastergate and Westergate (BEW).

Regional Policies

Coast to Capital Strategic Economic Plan (2014) (SEP)

- 6.2.15. The Coast to Capital Local Enterprise Partnership (LEP) is one of the 38 LEPs established by Government in 2011. It is a business-led collaboration between the private, public and education providing leadership, investment and business support to increase productivity and generate sustainable and inclusive growth.
- 6.2.16. The LEP area includes Bognor Regis as shown in **Figure 6.1** below. It covers a population of 2 million people, including 1.2 million of working age. It has nearly 90,000 businesses offering more than 800,000 jobs.
- 6.2.17. The A29 and BEW are at the heart of the LEP area and is designated by the LEP as a priority growth location.

Figure 6-1 - C2C LEP Area and Priority Growth Locations including Bognor Regis and the Enterprise Zone



- 6.2.18. The LEP published its Strategic Economic Plan (SEP) in March 2014. It proposed a six-year programme of investment in business-critical infrastructure, including transport and flood defences, and delivery of extra measures to deliver vigorous business growth, backed by investment in additional housing and in communities.
- 6.2.19. The LEP’s vision for the area is *“Our vision is that Coast to Capital will deliver exceptional growth and productivity gains to deliver economic performance to rival the best in Europe and the rest of the world”*, its mission is to remove all barriers to achieving economic performance, and its goal is *“to create an additional 100,000 jobs in the private sector by 2035”*.
- 6.2.20. Although Coast to Capital is in one of the UK’s most successful regions, the SEP identifies three compelling reasons why further investment should be made:
- Performance is good – despite some deficits in infrastructure – and investment will sustain and build economic success. However, essential underpinning infrastructure - particularly transport and flood defences - are reaching capacity and are no longer robust enough to support future growth - the fragility is beginning to show;
 - The UK economy needs the LEP area to perform at well above the UK average and at levels found in the best regions of Europe and in the rest of the World. If areas like this don't perform, the UK will not perform. The area can and will deliver more; and
 - Through the Growth Deal it is possible to deliver the high levels of the impact desired by the Government – new jobs, additional homes and new employment space; together with exceptional levels of match funding and leverage from the public and private sectors.

6.2.21. The Proposed Scheme forms the first phase of the A29 Realignment Scheme that will deliver the vision, mission, and goals of the LEP as it will act as a catalyst for local growth and will provide infrastructure to support development of new housing and job creation. It will also improve connectivity and capacity by upgrading a key transport link on the A29 in Arun. The A29 Realignment Scheme will reduce congestion (particularly by avoiding the level crossing), improve journey quality and reliability, and will enhance the resilience of the local road network.

Local Policies

- 6.2.22. The adopted ALP 2011-2031 identifies Bognor Regis as a strategic location where new development is expected to help deliver much needed regeneration during the lifetime of the Plan. The ALP also allocates land at Barnham, Eastergate and Westergate (BEW) for strategic housing and commercial development and associated community infrastructure. The site allocation also includes an indicative route for the A29 Realignment Scheme (see Figure 6.2) to provide access to the site as part of a strategic infrastructure package to mitigate the cumulative impacts of development over the plan period.
- 6.2.23. The existing A29 currently experiences traffic congestion during peak periods, especially at the Woodgate level crossing. This has led to unreliable journey times and queuing vehicles, affecting air quality. The ALP identifies at Paragraph 15.3.4 that *“The indicative highway improvement schemes, which are safeguarded in the policy below, are to be delivered alongside strategic development proposed in this Plan as part of a mitigation and development facilitation package. These improvements add greater potential for increasing economic activity and job density in Arun”*. These schemes include the *“A29 realignment through the Barnham/Eastergate/Westergate strategic site allocation - The potential to realign the A29 has long been documented by West Sussex County Council as a scheme to reduce congestion and to provide better north-south links between the A27 and the A259. The Council has worked with WSCC to develop an evidence base to support a realigned A29 route which includes bridging the railway line. The indicative scheme will also run through the strategic housing allocation, acting as an access route for the proposed development, as detailed in policy H SP1. This strategic priority ties in with the aim of the West Sussex Local Transport Plan (2011 - 2026) to “develop opportunities through new development that will improve the access along the A29, including the potential to bridge the railway level crossing at Woodgate”*.
- 6.2.24. Paragraph 15.3.4 goes on to state *“the realignment would become more attractive to users and transfer more traffic away from the existing A29 and surrounding villages. Furthermore, the northern tie-in route would reduce traffic approaching the A29/B2233 War Memorial Junction and would resolve existing congestion problems.”*
- 6.2.25. The need for the A29 Realignment Scheme is also recognised in the West Sussex Transport Plan 2011-26 (LTP3). As mentioned in the preceding section, this Plan sets the strategy for guiding future investment in our highways and transport infrastructure. At paragraph 2.2.2 (Key Issues and Aims), the Plan highlights the problem of road congestion during peak periods on the A29 and the disruption to journey times and causing poor air quality. It also notes that traffic travelling along the A29 (to access Littlehampton, Bognor Regis and the coastal area) is often delayed due to the level crossing at Woodgate which also creates congestion and poor air quality. The aim therefore is to *“Develop opportunities through new development that will improve the access along the A29”*, of which the Proposed Scheme will achieve this aim.

- 6.2.26. The A29 Realignment Scheme would allow traffic to avoid the level crossing at Woodgate and therefore improve delays and journey times.
- 6.2.27. In conclusion, there is a clear and established need and policy support for the A29 realignment, of which the Proposed Scheme forms a part, as identified in the national, regional and local plan policies and documents. The A29 Realignment Scheme will:
- Enable delivery of new homes in Arun District supporting delivery of around 11,400 new dwellings and 104,000sqm of commercial development on permitted or planned development sites in this part of Arun District;
 - Improve connections;
 - Improve and expand the Green Grid to promote strategic east/west and north/south links;
 - Encourage walking and cycling;
 - Support delivery of the Strategic Economic Plan and the Local Plan by enabling the delivery of new homes and jobs;
 - Improve journey times on the A29 by avoiding the Woodgate level crossing, Lidsey bends and the A29/B2233 War Memorial Junction;
 - Create a sense of place for the strategic allocation;
 - Enable delivery of new jobs;
 - Improve road safety;
 - Protect the local environment such as improvements to air quality; and
 - Support sustainable modes of transport.
- 6.2.28. The Proposed Scheme which forms part of the A29 realignment Scheme will therefore accord with the NPPF Section 2 (Achieving sustainable development); and ALP Policies SD SP1 (Sustainable Development), C SP1 (Countryside), INF SP1 (Infrastructure provision and implementation), T SP1 (Transport and Development), T DM1 (Sustainable Travel and Public Rights of Way), and T SP3 (Safeguarding the Main Road Network).

6.3 HIGHWAYS AND SUSTAINABLE TRAVEL

- 6.3.1. It is well documented that traffic congestion along this section of the A29 Fontwell Avenue is high. Road users and bus passengers frequently experience delays at peak times, especially during the afternoon on weekends. With 11,400 new homes and 104,000sqm of new commercial development with a predicted 100,000 new jobs in the private sector by 2035 in the Bognor Regis Enterprise zone, traffic flows are predicted to increase in the future if nothing is done.
- 6.3.2. Both ADC and WSCC have identified that highway mitigation is required if the predicted economic growth is to be realised.
- 6.3.3. An assessment of the highway effects of the Proposed Scheme has been carried out to support the Planning Application. Full details of the assessment are found in the Transport Assessment (TA) and in Chapter 8 'Transport & Access' of the ES.
- 6.3.4. In summary, in order to determine the existing traffic flow conditions (baseline surveys) in the vicinity of the Proposed Scheme, 8 Manual Classified Turning Counts (MCTC), and 7 Automatic Traffic Counts (ATC) were commissioned at various locations in the near vicinity of the Application Site. The survey locations are listed below for the ATC and MCTC data respectively:

ATC Link Count Locations

<ul style="list-style-type: none"> • Brittens Lane North of A27 • B2132 Yapton Lane (between the street and the lake house) • B2233 Nyton Road East of A29 	<ul style="list-style-type: none"> • B2233 Barnham Road East of A29 • A29 South of Eastergate Lane • B2233 Nyton Road West of A29 • A29 South of Woodgate
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MCTC Survey Locations

<ul style="list-style-type: none"> • A27 / The Street Junction • A27 / B2233 Nyton Road • A27 / A29 Fontwell Roundabout • A27 / A29 Slindon Common Roundabout • A29 / B2233 Junction 	<ul style="list-style-type: none"> • A29 / Westergate Street / B2233 Nyton Road Junction • A29 / A259 Junction • A259 Rowan Way / A29 Shripney Road Junction
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6.3.5. The assessment was undertaken using the strategic 2017 Chichester Area Transport Model (CATM) model with operational junction assessment undertaken using LinSig and Junctions 9. The assessment scope is based on the TA methodology agreed with WSCC. The CATM forecasts for this TA consist of:

- Without Scheme and With Scheme Opening Year Scenarios (2023)
- Without Scheme and With Scheme Design Year (+15 year) Scenarios (2038).

6.3.6. The Do Something networks contain the committed infrastructure developments included in the Do Minimum network for the corresponding year as well as the changes to the network associated with the scheme under assessment.

6.3.7. Junction modelling for future year assessments was undertaken at six junctions within the vicinity and within the Proposed Scheme:

Existing Junctions: -

- A29 Westergate Road / B2233 Nyton Road
- A29 Fontwell Avenue / B2233 Barnham Road
- A27 Arundel Road/ A29 Fontwell Avenue

Proposed Junctions: -

- A29 Fontwell Avenue / Northern section of Re-alignment road
- B2233 Barnham Road / Northern section of Re-alignment road
- Site Access roundabout to Northern Development

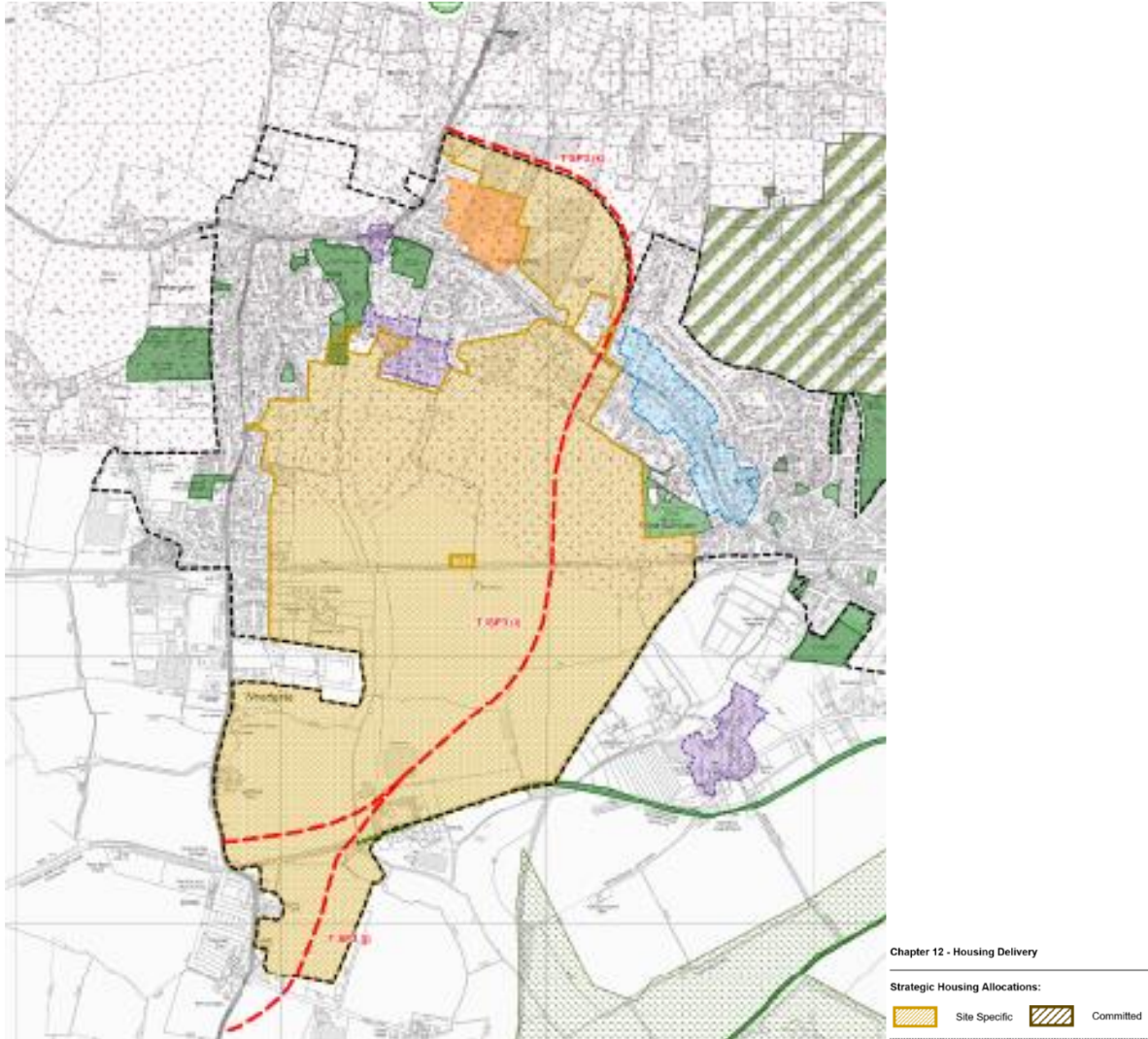
6.3.8. The results of the junction modelling undertaken in this assessment demonstrated that for the 2023 and 2038 scenarios, there was an overall decrease in delay at War Memorial roundabout as a result of the Proposed Scheme.

- 6.3.9. The junction modelling also showed that the proposed junctions at the northern and southern end of the Proposed Scheme operate within theoretical capacity in the AM and PM peaks in both the 2023 and 2038 scenarios.
- 6.3.10. The improved cyclist and pedestrian facilities and shared use path will encourage local residents to undertake local trips on foot or by bike.
- 6.3.11. The assessment concludes that the Proposed Scheme would be beneficial to the highway network in the Westergate area especially at the War Memorial roundabout where existing traffic diverts to use the Proposed Scheme.
- 6.3.12. Modelling for both 2023 and 2038 future year assessments show that the Proposed Scheme would have a minimal or beneficial impact on the assessed junctions. There will be an increase in southbound traffic at the A29 Westergate Road / B2233 Nyton Road junction. However, it is anticipated that this will be reduced when Phase 2 becomes operational.
- 6.3.13. Overall, it is considered that the Proposed Scheme will form the first phase of a road improvement scheme which will adequately mitigate the current identified problems with this section of the A29 and provide sufficient capacity to deliver the significant new allocated housing sites on land near Barnham, Eastergate, Westergate (see Figure 6.2 below) during the ALP period (2011-2031), with potential on the Site for a further 700 dwellings to be delivered after 2031. It is therefore considered that the Proposed Scheme will comply with the aforementioned transport related policies in section 5 of the Statement, in particular with:
- Strategic aims and objectives for Arun as set out in the West Sussex Transport Plan 2011-26;
 - Policy T SP1 (Transport and Development) which seeks to ensure that development provides safe access on to the highway network; contributes to highway improvements and promotes sustainable transport, including the use of cycle and pedestrian network;
 - Policy T DM1 (Sustainable Travel and Public Rights of Way) which seek to ensure ease of movement, prioritising safe pedestrian and cycle access; and
 - Policy T SP3 (Safeguarding the Main Road Network) which seek to ensure that improvements necessary to enhance the strategic and supporting road network within the District can be carried out, as shown on the Policies Map.

6.4 DESIGN QUALITY

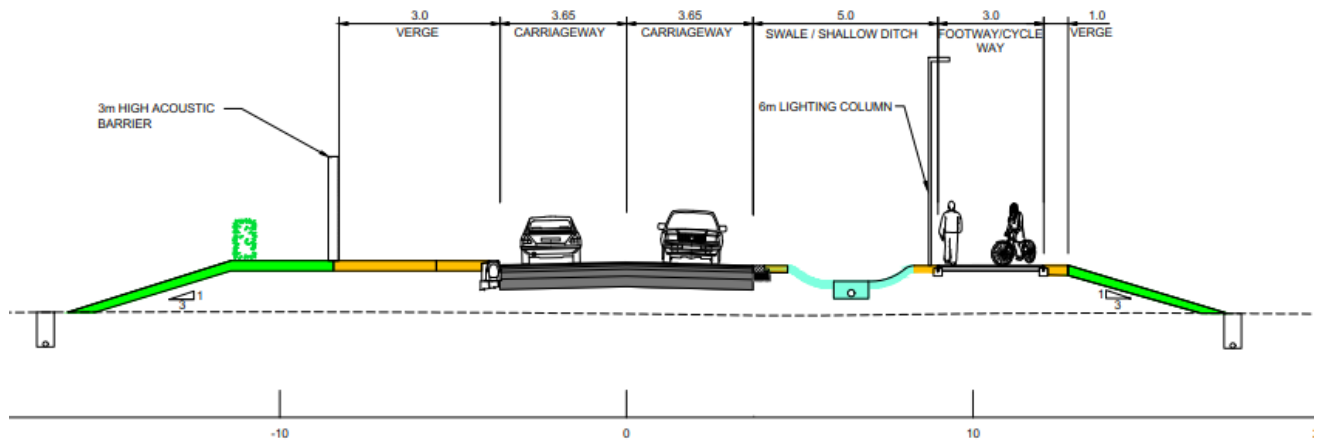
- 6.4.1. The proposed highway design is utilitarian – it is based mainly on its need, function and purpose, rather than on aesthetics. As previously mentioned, the Proposed Scheme will deliver phase 1 of a two phased comprehensive highway improvement scheme. The ALP identifies Bognor Regis as a strategic location where new development is expected to help deliver much needed regeneration during the lifetime of the Plan. The ALP also allocates land at Barnham, Eastergate and Westergate for strategic housing, as shown in Figure 6.2 below, and commercial development and associated community infrastructure. The site allocation also includes an indicative route for the Proposed Scheme to provide access to the site as part of a strategic infrastructure package to mitigate the cumulative impacts of development over the plan period.
- 6.4.2. The layout of the Proposed Scheme is primarily dictated by the function of the scheme. Its alignment is dictated by the indicative line set out as a red dotted line (**see Figure 6.2**) in the ALP Policies Map 2.

Figure 6-2 - Allocated Housing Sites in the ALP



6.4.3. The segregation of motorised vehicles and pedestrian and cyclists in the proposed layout (Site Layout Plan drawing nos. A29-CAP-HPN-00-DR-C-0132 to – 0136 (consec)), in the typical sections of the proposed new carriageway layout (Cross Sections drawing nos. A29-CAP-HPN-00-DR-C-0180 to -0182 (consec)) – see Figure 6.3 below, is intended to encourage walking and cycling on this road due to an increased sense of safety through physical separation of traffic.

Figure 6-3 - Typical Cross Section Plan



- 6.4.4. The road has been designed to adoptable standards and therefore is to a scale which is no larger than is necessary to accommodate the predicted traffic flows.
- 6.4.5. The design seeks to ensure that it minimises adverse effects on views; adopts an appropriate scale, layout, and density necessary for efficient operation but is sympathetic to prevailing site and surrounding characteristics, in accordance with ALP Policies D SP1 (Design) and D DM1 (Aspect of form and design quality). Where appropriate, the Proposed Scheme incorporates sustainable design principles such as selecting environmentally friendly building products, and sustainable drainage design.
- 6.4.6. A comprehensive landscape scheme forms an integral part of the overall design proposals and are shown on the Soft Landscape Plan drawing nos. A29-WSP-LA-GA-001 to – 005 (consec). The proposed landscape scheme meets the criterion contained within ALP Policy LAN DM1 (Protection of Landscape Character) and BENP Policy ES4 (Protection of open views), through where possible, protecting existing landscape features, with attention paid to the provision of strategic tree planting becoming denser in areas around the attenuation ponds and to the creation of linear habitat features. Proposed shrub and scattered tree planting that line the carriageway will manage the transition between built form and adjacent fields. The proposed landscaping will visually soften the impact of the urban road feature. Such landscape design measures lessen the visual impact and will ensure the proposal is sympathetically assimilated into the surrounding agricultural landscape.
- 6.4.7. Overall, it is considered that the Proposed Scheme will comply NPPF (Section 12. Achieving well-designed places); ALP Policies D SP1 (Design), D DM1 (Aspect of form and design quality), and LAN DM1 (Protection of Landscape Character); and BENP Policy ES4 (Protection of open views).

6.5 ENVIRONMENTAL CONSIDERATIONS

- 6.5.1. Notwithstanding the clear demonstrable need for this section of highway infrastructure, environmental considerations have been examined throughout the preparation of this planning application. A full suite of environmental surveys have been undertaken as part of the EIA to give a full assessment of any likely significant effects, to support the design of the proposal. The main findings of these assessments are summarised below.

AIR QUALITY AND DUST

- 6.5.2. Chapter 6 of the ES assesses the likely significant effects arising from the scheme on air quality.
- 6.5.3. Defra's PCM model for the study area and the wider WSCC area shows that the baseline air pollutant levels in 2017 were well below the EU Air Quality Standards (AQS) levels. Similarly, ADC show that current NO₂ levels are significantly below the AQS level of 40µg/m³. Defra's modelled future baseline level of air pollutants is lower in 2023 than in 2017, reflecting its forecast reductions in vehicle emissions.
- 6.5.4. The assessment concludes that there is likely to be a direct, temporary, short term, moderate adverse effect on all receptors during the construction phase. There are 136 receptors within 100m of construction activities with a high sensitivity level. An addition 146 receptors are between 100-200m from construction activities with a low sensitivity.
- 6.5.5. The Construction Environmental Management Plan (CEMP) will comprise a range of appropriate mitigation measures, which may include damping down of dry services, locating stockpiles away from sensitive receptors, or on-site speed restrictions. The residual effects following the implementation of these mitigation measures will reduce the identified effects to acceptable levels. The assessment recommends that mitigation measures are monitored via regular site inspections to ensure effective implementation.
- 6.5.6. The assessment also concludes that post construction, concentrations of all pollutants would remain well below the AQS. The greatest increase would be 1.2µg/m³ at receptors E11 (Green Oaks, B2233 Barnham Road, Eastergate) and E12 (Chantry Mead, Eastergate) where the concentrations with the Scheme would be 13.2µg/m³ and 10.5µg/m³ respectively, both well below the AQS level of 40µg/m³.
- 6.5.7. Therefore, pollutants generated by the Proposed Scheme will be below DEFRA's predicted air quality levels, and as such, no further mitigation measures will be required.
- 6.5.8. The Proposed Scheme is considered to comply with ALP Policies QE SP1 (Quality of the Environment) and QE DM3 (Air Pollution).

NOISE AND VIBRATION

- 6.5.9. Chapter 7 of the ES reports on the noise and vibration impacts of the proposed scheme on residential dwellings and other sensitive receptors.
- 6.5.10. There are several residential properties that are located immediately adjacent to the area where the Proposed Scheme will meet the B2233 Barnham Road, notably Murrell Gardens, Ewens Gardens and Downview Road. There are also residential properties on the A29 Fontwell Avenue, which will be within close proximity to the north eastern tie-in of the scheme. Dwellings south of Eastergate Lane are within 300m from the scheme alignment.
- 6.5.11. The closest Noise Important Area (IA), railway RI 550, is located around Barnham Station just within 1km west of the scheme. Further afield, there are Noise IAs on the A27 over 1km north of the scheme. These include IA 12491. In addition, IA 12493, located to the south east on the A29, is also at a distance over 1km from the scheme.
- 6.5.12. In the construction phase, noise and vibration will have a major, temporary, direct and short-term impact on residential dwellings. A range of mitigation measures (using Best Practical Means – BPM) will be implemented, including switching vehicles and plant off when not in use, installing the

permanent 3m noise barrier at the earliest opportunity, using low vibratory equipment and methodologies, and locating vibratory plant equipment at least 50m from sensitive receptors.

- 6.5.13. In regard to the operational phase, the assessment has identified a need for a noise barrier on the eastern side of the new road alignment and properties on Murrell Gardens. The barrier will be 3m high, approximately 440m long and comprise of absorptive materials required to reduce noise to acceptable levels at the properties on Murrell Gardens.
- 6.5.14. The assessment demonstrates that the Proposed Scheme with mitigation will not have significant adverse noise effect on the amenity of nearby residents.
- 6.5.15. The Proposed Scheme is considered to comply with ALP Policies QE SP1 (Quality of the Environment) and QE DM1 (Noise pollution).

ECOLOGY AND NATURE CONSERVATION

- 6.5.16. Chapter 9 of the ES reports the outcome of the assessment of likely significant effects arising from the Proposed Scheme upon Ecology and Nature Conservation.
- 6.5.17. The ecological baseline status has been established through desk studies and field surveys. A range of habitats and species were considered in the assessment including:
- On and off-site habitats of conservation importance;
 - Bats;
 - Badger;
 - Birds;
 - Reptiles; and
 - Invertebrates.
- 6.5.18. The assessment identified that during the construction and operation phases the likely effects will be significant on all receptors and therefore, the following mitigation measures are recommended:
- The production of a Construction Environmental Management Plan (CEMP) and associated Ecological Management Plan (EMP) for the construction phase of the Proposed Scheme (refer to Appendix 3.5 of the ES). The CEMP and EMP will include best practice construction measures to minimise the effects of noise pollution and visual disturbance to onsite and offsite receptors, as well as a sensitive programme of works, a sensitive temporary lighting regime and measures for sensitive vegetation clearance;
 - The production of a permanent sensitive lighting strategy to reduce effects upon sensitive habitats and species, to be informed by best practice guidance regarding bats, refer to the lighting assessment (Appendix 10.2 of the ES); and
 - Landscaped areas to be managed in line with the Landscape Maintenance and Management Plan (LMMP) (refer to Appendix 10.4 of the ES) and sensitively with regard to protected species.

Biodiversity Net Gain

- 6.5.19. A biodiversity net gain assessment of the landscape design prepared for the Proposed Scheme has been undertaken. The aim was to achieve a biodiversity net gain (BNG) of 10%. The results of the assessment indicate that whilst the area-based habitats achieve a BNG of +44% the hedgerow units show a no net loss of +3%. As such, the Proposed Scheme does not achieve a scheme wide BNG.
- 6.5.20. However, this is due principally to the lack of available land to provide additional planting to achieve a net gain. The immediate surrounding land has been allocated for housing development and it is

considered that on balance, the need to achieve a biodiversity net gain is outweighed by the need to provide additional housing to meet ALC's housing delivery targets.

LANDSCAPE

- 6.5.21. A Landscape Character and Visual Assessment has been undertaken to inform the iterative design process of the Proposed Scheme and assess the likely effects on identified landscape and visual receptors. Full details of the assessment is found at Chapter 10 of the ES.
- 6.5.22. The Application Site is located approximately 1.4km to the south of the South Downs National Park and to the north of the coastal town of Bognor Regis within National Character Area 126 – South Coast Plain. It is a transitional landscape that mainly comprises arable fields, woodland, hedgerows, orchard and areas of managed grassland. The Site is also part of numerous local landscape designations, as set out in WSCC and ALP landscape assessments.
- 6.5.23. In summary, the assessment concludes that the Proposed Scheme will not impact adversely on any landscape designations, including the three Landscape Character Areas identified in Table 10-8 of the EIA, and will not exhibit any rare or unusual landscape features. Construction effects will be temporary and will be mitigated through the CEMP.
- 6.5.24. Whilst there would inevitably be some visual impact on the surrounding landscape post operation, this should be considered against the need for the development, as well as the strategic requirement for the road to be in the location proposed in order to enable future housing growth. Furthermore, this should all be considered in the wider context; the Proposed Scheme is not too remote from settlements and, as designated in the ALP, is within an area of planned change. The Proposed Scheme will become integrated with future residential development, extending the urban form and creating a new settlement. Therefore, the visual impact of the Proposed Scheme will lessen over time.
- 6.5.25. The design of the Proposed Scheme has included landscape mitigation measures which includes:
- New woodland planting to create habitat for wildlife in addition to provide green visual containment;
 - New specimen tree planting to enhance visual appeal and integrate the Proposed Scheme into the surrounding;
 - New hedgerow planting to enhance visual amenity of the Proposed Scheme and respond positively to the local character; and
 - Areas of wildflower grassland and bulb planting to enhance the biodiversity along with visual appeal.
- 6.5.26. On balance, it is considered that the need and the benefits that the Proposed Scheme will deliver outweigh the short-term adverse effects the proposal will have on the landscape character of the area. The Proposed Scheme will comply with ALP Policy LAN DM1 (Protection of Landscape Character) and BENP Policy ES4 (Protection of open views).

WATER RESOURCES AND FLOOD RISK

- 6.5.27. Chapter 11 of the ES reports the outcome of the assessment of likely significant effects arising from the Proposed Scheme upon water resources, flood risk and drainage.

- 6.5.28. There are a number of sensitive surface and ground water resource receptors near to the Application Site that could be affected by pollution (Barnham Lane Ditch, Barnham Rife, Lidsey Rife and School Ditch, and Superficial Deposits).
- 6.5.29. The assessment concludes that the Proposed Scheme has the potential to adversely impact on the water quality of water resources as a result of construction activities through accidental leaks and spillages or release of harmful substances caused by materials being stored on site, such as oils, fuels and other chemicals. It also identified a number of activities which could reduce surface water quality with respect to physical contaminants. These include:
- Site clearance;
 - Excavations;
 - Groundwater dewatering;
 - Localised ground remediation (if required); and
 - Materials handling, storage, stockpiling, spillage and disposal.
- 6.5.30. In addition, during periods of heavy rainfall, vehicle movements associated with construction activities may result in damage to soil structure that may generate increased sedimentation within surface run-off.
- 6.5.31. The proposed Scheme will introduce a significant amount of new impermeable areas leading to increased rates and volumes of surface water runoff which has the potential to increase flood risk within the vicinity of the Application Site. An analysis of the Environment Agency's Risk of Flooding from Surface Water map indicates that the interception of overland flows could result in an increase in flood risk as the Proposed Scheme crosses existing flow routes. The drainage proposals are designed to control runoff up to the 100 year event plus 40% increase due to climate change. The proposed discharge rate into the Barnham Lane Ditch is 1.8l/s which is a significant reduction in greenfield runoff for up to the 100 year plus 40% climate change event.
- 6.5.32. The potential increase in flood risk associated with surface water run-off from new impermeable areas in the proposed Scheme can be managed through the implementation of the drainage design. Furthermore, the assessment recommends the following pollution control measures:
- The use of swales as runoff collection mechanisms and interception mechanisms. Swales are designed depressions in the ground designed to carry water away to appropriate locations (e.g. attenuation ponds). Infiltration along the route, for example through grass, can filter suspended sediments and slow water flow;
 - The use of infiltration and attenuation ponds for water storage; and
 - The use of swales or filter drains for conveyance of water away from the road into the ground.
- 6.5.33. The above mitigation measures have been incorporated into the Proposed Scheme. Following implementation of these measures, the assessment concludes that the effects on water resources and flood risk will not be significant. This approach provides adequate storage and improved water quality in line with current best practice.
- 6.5.34. It is therefore considered that subject to the implementation of the mitigation measures, which have been incorporated into the scheme design, the Proposed Scheme will comply with ALP policies W SP1 (Water), W DM2 (Flood Risk) and W DM3 (Sustainable Urban Drainage Systems).

GEOLOGY & SOILS

- 6.5.35. A Preliminary Risk Assessment has been carried out with the results contained in the Contaminated Land Preliminary Risk Assessment and Chapter 12 of the ES.
- 6.5.36. At present the majority of the Application Site is undeveloped and is situated in soft landscaped areas. The southern part of the Application Site is currently occupied by the Fleurie Horticultural Nursery which has a loose gravel surface and is occupied by several greenhouse buildings and other smaller ancillary buildings. An electrical substation is present in the north-western area of the site along Fontwell Avenue adjacent to the existing A29 road.
- 6.5.37. Historical mapping indicates that the majority of the Site has never been develop. A gravel pit was excavated in the north-west corner of the Site in 1897 and was subsequently filled in between 1937 and 1939. The Springfield plant nursery was first constructed in 1912 (originally named The Brooks). By 1974 additional buildings had been built in the plant nursery to resemble the current layout as well as two tanks. In 2018 a below ground water reservoir was built in the southern part of the plant nursery. The surrounding area of the Site has a mixed history of residential, agriculture, gravel extraction and landfilling and commercial use.
- 6.5.38. The Assessment concludes that there is a low risk to construction workers and end users, buildings and underground structures, and UXO. There is a risk to controlled waters however this will be managed through the suggested mitigation measures contained in the FRA and CEMP.

HISTORIC ENVIRONMENT

- 6.5.39. The relevant polices are NPPF Section 16 - Conserving and enhancing the historic environment; and ALP Policies HER SP1 (The Historic Environment) and HER DM6 (Sites of Archaeological Interest).
- 6.5.40. Chapter 13 of the ES reports the outcome of the assessment of likely effects arising from the Proposed Scheme upon Archaeology. Assessment of likely effects on above-ground heritage assets (such as conservation areas and listed buildings) have been scoped out of the ES, and confirmed in the Scoping Opinion which is found in the ES.
- 6.5.41. The Application Site does not contain any nationally designated heritage assets, such as World Heritage Sites, Scheduled Monuments, listed buildings, Registered Battlefields, or registered parks and gardens. Also, it is not in a conservation area or in an Archaeological Notification Area (ANA).
- 6.5.42. Buried heritage assets from various periods have been recorded on-site or in the near proximity, such as a Palaeolithic axe 1.2km to the north-east of the site and Saxo-Norman assets 800m south-west of the site. A full chronological summary is set out in page 12 of ES Chapter 13.
- 6.5.43. The assessment concludes that the Proposed Scheme could have a significant impact on prehistoric and roman remains if present, due to the construction activities such as site preparation, road construction, excavation for attenuation ponds, services/drainage and possible planting. Therefore, it is recommended that an archaeological investigation is carried out prior to construction in order to clarify the nature, survival and significance of any archaeological assets that may be affected. A draft Written Scheme of Investigation (WSI) for an archaeological trial trench evaluation, and an Outline Archaeological Mitigation Strategy are attached to the Environmental Statement as requested by the WSCC Archaeological Advisor. As an alternative to trial trenching a preliminary site strip, in the form of Strip, Map and Sample may be undertaken under archaeological direction

during the construction phase. Regardless of the option, a Post-Excavation Assessment Report would be prepared.

- 6.5.44. In such circumstances, mitigation normally comprises preservation by record: advancing understanding of asset significance through targeted archaeological excavation in advance of development. This might be combined with a watching brief during ground works for remains of lesser significance. Post-mitigation residual effects are likely to be negligible and not significant on both prehistoric and Roman remains.

MINERALS

- 6.5.45. A Minerals Statement has been prepared to accompany the application and is attached at Appendix B of this Planning Statement. The site is within a Minerals Safeguarding Area for Sharp Sand and Gravel in the West Sussex Joint Minerals Plan.
- 6.5.46. The statement concludes that whilst it would be possible to recover sand and gravel deposits to form an aggregate product, the refinement process is likely to incur significant additional processing costs due to the high percentage of recorded clay cohesive bands, and this will reduce the economic viability of recovery and reuse of the resource.

AERODROME SAFEGUARDING

- 6.5.47. The Site is located approximately 6.7km from Goodwood Aerodrome. The operators of Goodwood Aerodrome have been consulted on the Proposed Scheme and have confirmed that they have no objection to Phase 1 of the A29 realignment on aerodrome safeguarding grounds. An Aerodrome Safeguarding Statement confirming this is attached at Appendix C of this Statement.

7 CONCLUSION

7.1.1. Planning permission is sought for:

“The construction of a 1.3km single carriageway with a 3m wide shared cycleway / footway, one uncontrolled pedestrian crossing to enable users of the PRow to cross the carriageway, three roundabouts, provision of hard and soft landscaping, road markings, traffic signals, bus stops, and signalised pedestrian crossings, construction of a substation building; installation of a noise barrier, and other associated works”

7.1.2. The existing A29 experiences traffic congestion during the peak periods, notably at the Woodgate level crossing, leading to unreliable journey times and potentially causing poor air quality. The congestion is caused by the Woodgate level crossing barriers being down resulted in delays of approximately 35 minutes in the peak hours.

7.1.3. To the north west of the Proposed Scheme is the War Memorial junction. This junction is a critical pinch point on the existing highway network, with limited scope for capacity improvements due to the current land constraints surrounding the junction. As such the junction is likely to be a significant constraint on the level of future development.

7.1.4. To the south of the Proposed Scheme are the Lidsey bends. This is a section along the existing A29 through Lidsey where the alignment requires drivers to negotiate a series of significant bends in the road which have historically been a source of concern from a road safety perspective.

7.1.5. The strategic site allocations identified in the ALP will generate and affect the distribution of traffic in the district. The cumulative impacts of the strategic site allocations are expected to increase demand on the existing A29 and B2233 roads by non-motorised users and motorised vehicles, including public transport. The Proposed Scheme represents phase 1 of a two phased scheme which, when completed, will overcome the current traffic issues associated with the existing A29. It will provide access to planned strategic development at Barnham, Eastergate and Westergate (shown in Figure 6.2 above) and will help to mitigate impacts on the highway network that would otherwise be severe. Additionally, there have been recently completed and/or planned commercial developments north of Bognor Regis at a strategic site known as Enterprise Bognor Regis' that could potentially benefit from the A29 Realignment Scheme.

7.1.6. The ALP is supported by an evidence base that includes the Arun District Local Plan Transport Study 2017 (Local Plan Transport Study). The Local Plan Transport Study identifies a package of strategic infrastructure to mitigate the severe residual cumulative impacts of development that includes the A29 Realignment.

7.1.7. To ensure the Proposed Scheme supports the objectives of the WSTP and encourages the use of sustainable modes of transport and sustainable travel patterns in the strategic development, it has been designed to cater for non-motorised and motorised users, including public transport. The design also integrates with the existing highway network and new routes proposed as part of the strategic development.

7.1.8. The case for the A29 Realignment Scheme of which the Proposed Scheme is a part, is four-fold:

Strategic: The A29 Realignment Scheme is an important part of the WSCC's strategy to support growth and development. It will enable the local road network to operate more efficiently by reducing congestion, improving the predictability of journey times and providing more capacity for growth.

Economic: The Proposed Scheme will help build a strong, responsive and competitive economy, as it will provide infrastructure that will support growth in the local area. Over a 60 year appraisal period, the value of monetised benefits from journey time savings outweighs the cost of the scheme by a factor of 1.8 to 1.0. According to the DfT Value for Money categories, this benefit cost ratio value is considered to be medium. The DfT generally expects major transport schemes seeking investment to offer at least medium value for money.

The main contributor to the benefits is the average travel time savings resulting from the Proposed Scheme and the avoidance of Woodgate level crossing and War Memorial Junction. This provides drivers with improved journey times and a more direct route. There are also potential accident savings, notably the Lidsey bends. This exceeds the cost of constructing the scheme and its ongoing maintenance;

Social: The Proposed Scheme will provide infrastructure to support the building of new homes that will create new, vibrant and healthy communities; and

Environmental: The Proposed Scheme will make effective use of land.

7.1.9. The Consultation process undertaken at the Outline Business Case stage, covering Phase 1 in combination with Phase 2, generated a number of concerns to the A29 Realignment Scheme. These included:

- Disruption during construction;
- Impact on existing residential properties;
- Amenity issues - noise, light or air pollution;
- Impact on landscape and scenery;
- Congestion and journey time;
- Road safety; and
- Impact on routes used by people walking, cycling and horse riding.

7.1.10. It is acknowledged that there will be some adverse impacts to local residents during the construction phase, however, these will be short term. Furthermore, the Proposed Scheme will not deliver a biodiversity net gain, due principally to the lack of available land which has been allocated for housing development.

7.1.11. However, the disbenefits are considered to be outweighed by the overwhelming public benefits that the Proposed Scheme will deliver. These include:

- Enable delivery of new homes in Arun District supporting delivery of around 11,400 new dwellings and 104,000sqm of commercial development on permitted or planned development sites in this part of Arun District;
- Improve connections;
- Improve and expand the Green Grid to promote strategic east/west and north/south links;
- Encourage walking and cycling;
- Support delivery of the Strategic Economic Plan and the Local Plan by enabling the delivery of new homes and jobs; and
- Improve journey times on the A29 by avoiding the Woodgate level crossing, Lindsey bends and the A29/B2233 War Memorial Junction.
- Create a sense of place for the strategic allocation;
- Enable delivery of new jobs;
- Improve road safety;

- Protect the local environment such as improvements to air quality; and
- Support sustainable modes of transport.

7.1.12. The overarching conclusions set against the policy context for the Proposed Scheme creates a compelling case for the approval of this Planning Application. This Planning Statement undertakes an assessment of the proposals against a series of national and local development plan policies, with due regard to relevant material considerations. As an overview, it is clear that the Proposed Scheme complies with the Development Plan considered as a whole, adding to the case for the positive consideration of this Planning Application.

7.1.13. It is therefore considered that taking the Development Plan as a whole, the Proposed Scheme complies with the plan, and that the Development Plan and other material considerations point strongly in favour of the grant of planning permission.



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