

The Minster Building 21 Mincing Lane London EC3R 7AG 020 7837 4477 london@lichfields.uk lichfields.uk

FAO Andrew Sierakowski Planning Services West Sussex County Council County Hall Chichester PO19 1RH

Date: 15 December 2020

Our ref: 14677/01/SSL/VBM/19101376v5

**Your ref:** WSCC/052/20

Dear Mr Sierakowski

## West Sussex County Council: Phase 1 A29 Realignment (ref. WSCC/052/20) – Comments on behalf of The Southern Consortium

We write in relation to the above planning application on behalf of our clients, The Church Commissioners for England (CCE) and Hanbury Estates, who comprise The Southern Consortium (SC) and own the majority of land in the Barnham Eastergate Westergate (BEW) strategic allocation (Policy HSP2c SD5 in the adopted Arun Local Plan, July 2018). The SC controls part of the land which is subject to planning application WSCC/052/20. This land is being provided by the SC in order to facilitate the A29 Phase 1 works. On behalf of the SC, we are currently in the advanced stages of preparing a hybrid planning application for the surrounding land, including the A29 Phase 2 works, extending the road to the south through the BEW allocation and the surrounding residential development.

Arun District Council Local Plan Policy H SP2 states that development proposals within strategic site allocations must be comprehensively planned and this applies to the BEW allocation which Phase 1 of the A29 realignment forms part of. Specifically for BEW, Local Plan Policy H SP2c SD5 requires that a comprehensive strategy for surface water management is developed.

The SC supports in principle the Phase 1 scheme of the A29 realignment (LPA ref: WSCC/052/20) coming forward as an important part of the BEW allocation. We have been in active dialogue with officers at WSCC both pre and post submission of the application. We have raised comments on the design and would welcome the opportunity to continue to discuss these further with the applicant to ensure the proposals for both applications can be aligned. Once delivered, the A29 realignment will be a single stretch of road and we are keen to work with WSCC to ensure a comprehensively designed scheme to ensure that each Phase does not inadvertently constrain another or lead to future abortive work as a result of the phased delivery of the road.

Our main feedback on the application, relates to the location and orientation of 'Off-line Attenuation Pond No. 4' as noted on the submitted Drainage Strategy Layout drawing ref: A29-CAP-HDG-00-DR-C-0047-Po9.). The SC's drainage consultants, Pell Frischmann (PF), have advised that the pond should be located close to the A29 Phase 2 to allow suitable access and landscaping design between the road and the pond. At this stage the design needs to be flexible to incorporate further drainage from the A29 south of Barnham



Road and north of the ditch / School Stream to avoid parallel, separate systems draining the road under the same ownership and responsibility.

In addition, the SC team had previously queried with WSCC the proposal to retain the existing Barnham Road highways drainage pipe from Barnham Road to the ditch/School Stream. This remains part of the submitted scheme and PF has advised that it may have implications on the drainage solution and eventual construction of Phase 2 of the A29. For example, it is understood from Arun District Council records, that the pipe currently passes directly beneath the Phase 2 alignment. The final headwall proposed in Phase 1 may require further diversion beyond what is already proposed to facilitate Phase 2. Similarly the existing infrastructure may clash with any proposed services or drainage infrastructure meaning connection to Proposed Pond 4 or the upstream proposed pipe network may be further constrained.

PF is currently working on the detailed design for the A29 Phase 2 which will form part of the Southern Consortium's application in 2021. In the context of the comments above, and to avoid delaying the determination of the current A29 Phase 1 application, it is suggested that an appropriate planning condition is agreed which requires the detailed design of drainage work south of Barnham Road, to be approved prior to its technical approval/commencement of development. The detailed design should have due consideration to the A29 Phase 2 works and be subject to consultation with the relevant landowner to the south of Barnham Road (the Church Commissioners for England). On this basis, it is suggested the condition is worded as follows:

**Draft condition** - Prior to commencement of construction of the surface water drainage works, south of Barnham Road, the detailed design including the location and orientation of the Off-line Attenuation Pond No. 4' [and amendments to the Barnham Road highways drainage pipe] shall be submitted and agreed by the Local Planning Authority. The submission shall explain how it has taken into account the Phase 2 realignment scheme.

**Reason** – To ensure a comprehensive drainage design with due consideration to the future A29 Phase 2 proposals.

We hope these comments will be taken into account and would appreciate the opportunity to comment on any revised information submitted or updated condition wording. Should you require any further clarification, please do not hesitate to contact me or my colleague Victoria Barrett-Mudhoo.

Yours sincerely

**Clare Catherall** Associate Director

Copy Elaine Martin (WSCC)

Richard Wain (Hawksmoor)