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County Planning

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Mr. David Cassells
WSP
(By email only)

3rd February 2021

Dear Mr. Cassells,

Application Number: WSCC/052/20
Address: Land to the north of Eastergate and north-west of Barnham, PO22 0DF
Proposal: The construction of a 1.3km single carriageway with a 3m wide shared cycleway/footway, 2.5m wide central island, one uncontrolled pedestrian crossing with a central island 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 associated works.

Town and County Planning Act 1990 (as amended)

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Regulation 25 Further Information and Evidence Respecting Environmental Statements

I refer to the above application and write, in accordance with Regulation 25 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, to formally request that further information be submitted to West Sussex County Council ("the Council").

The submission of the following information is seen to be essential further information in respect of the application to verify the particulars of the submitted development proposals, and to enable proper consideration of the likely environmental effects. Notwithstanding any further information that may later be deemed necessary, the following information will be required to enable the Council to determine the application.

Where possible the following request refers to the comments of selected consultees and provides a summary of the additional information requested. For full details please see the full comment from each consultee available on the County Council's website at: <https://westsussex.planning-register.co.uk/Planning/Display/WSCC/052/20>

In addition, further information that is requested in support of the planning application, but not requested under Regulation 25, is listed.

If you consider that the requested information has already been submitted, please provide details of where in the submitted information it can be found.

Plans

- Insufficient sections have been provided. Additional/revised sections should be provided that;
 - a. Extend sufficiently to demonstrate the relationship between the road and adjacent land uses. Where relevant, these should detail residential gardens properties and accurately show any existing/proposed boundary treatments.
 - b. Include indicative landscape proposals (Only hedgerow alongside acoustic barrier currently shown).
 - c. Ensure that 'existing ground levels' on section E-E are correct (a landscaped bund alongside the Halo site does not appear to be shown). Nb: It should be confirmed that associated noise implications have been considered).
 - d. Provide an east/west section at the proposed roundabouts at Fontwell Avenue and Barnham Road (to include lighting columns).
 - e. Provide outline sections of ponds to confirm their depth/ design for ecological benefit.
 - f. Provide sections (and profiles) to show proposed levels for the 'temporary access track' to the south of Barnham Road.
- Layout and elevation details of the proposed substation is required (to include details of any proposed hard/soft landscaping and boundary treatments).
- Details of surfacing materials is required. This should provide details of all hard surfaces proposed, include those proposed at substation and pond access tracks. – Revised/additional plans with this detail required.
- The submitted Landscape plan (Appendix 3.3 - Sheet 5) shows an emboldened ramp/road feature adjacent to the pond the purpose of which is unclear and not included on any other plans. Please clarify/amend.
- Design drawings (Appendix 3.1) do not appear to show any details of the uncontrolled pedestrian crossing features on the northern limb of the Fontwell Avenue roundabout, or connection with the service road area (inconsistency with landscape and lighting plans).
- Both the design drawings and landscape plans are unclear as to how the new service road at Fontwell Avenue would terminate/transition into the new road alignment. Any boundary treatment, hard landscaping features, and vehicle turning areas (if proposed) must be made clear. Please clarify/amend.
- Design drawing (Sheet 1), seems to show areas of footpath alongside the Fontwell Avenue roundabout (in blue), that seemingly are shared footpath/cycleway (based on markings/width)? Further, it is not clear from this plan how proposed new foot/cycleways would transition into the existing highway features. Please clarify/amend colour key.
- Outline details of all proposed fencing and gates is required. This should include a plan and associated schedule detailing all proposed perimeter fencing, badger fencing (as specified in the Ecological Management Plan), pond containment fencing, deer fencing (if required), PROW fencing/gates/barriers (refer to PROW comments also), substation fencing, boundary fencing at the Halo site, and any fencing likely to be required to contain new planting areas. Further the proposed materials/finish of the acoustic barrier should be specified. Revised/additional

plans with this detail required. Clarification should be provided as to how such fencing has been considered in the LVIA.

- Design drawing (Sheet 4), seems to show cycleway markings in the carriageway (as opposed to on the shared cycleway). Please clarify/amend.

General

- Please clarify the total volume and likely specification of imported fill material that would be used to facilitate the raised highway (ref Table 3-3 which suggests a requirement for import of materials).
- It is noted that three construction compounds are proposed throughout the period of construction, however, details of their exact locations, and what they are likely to contain is limited. Outline layout plans should be provided including details of any likely mitigation measures/orientations which have been assumed to calculate construction impacts, particularly given the proximity to nearby residents. Further, whilst it is noted that a Construction Phase Drainage plan is proposed at the detailed design/implementation stage, comfort is sought that consideration has been given to the location of compounds to avoid areas of surface water flooding and/or that significant raising of land levels to accommodate the compounds would not be required.
- Environmental Statement para 5.4.15 suggests the development would take 3 years to implement, contrary to all other references in the documents which suggest a construction period of 1 year. Please clarify and confirm the basis for impact assessment.
- Please clarify how the unused limbs of the proposed roundabouts would be managed/closed until such time as future housing development comes forward.

Highways

Please refer to the full comments of WSCC Highways dated 18th November 2020. All requested information/clarification as set out below is required.

- Transport modelling - It is not clear from the TA how many dwellings have been factored into the transport modelling for the Barnham, Eastergate and Westergate (BEW) development. Please clarify.
- Design of road - A Design Check for the proposal is required. This should set-out design standards used for each component of the scheme including any identified Departures from Standard.
- Cycling infrastructure - For all cycle facilities, the applicant should show how these have been considered alongside LTN 1/20.
- Street lighting - From consideration of the plans, a street lighting scheme is shown for the entire road. However, with regard to the lighting for the cycle path, it is not clear whether the lighting here is suitable solely for the path or whether it is suitable for the road as well (or combination of both).
- Access to properties/businesses at western-end of road - Reference is made to swept path diagrams demonstrating access to properties and businesses at the western-end of the new road. However, these cannot be located in the TA. Please provide these for all vehicles likely to use the proposed re-configured access arrangements. Diagrams should extend to access to buildings in the south-eastern side of the roundabout too.

- Access to Halo industrial site – One of the submitted drawings shows access to the Halo commercial buildings taken from the southern-end of the new road. If access to Halo is proposed to change, this will need to be considered as part of the Stage 1 Road Safety Audit. Furthermore, visibility splays and details of this access should also be submitted (i.e. geometry, visibility splays etc.). The above-mentioned Design Check should also include consideration of this.
- Construction compounds south of Barnham Road – These would necessitate movement of plant and materials across Barnham Road. Please provide further detail of the method of operation during the construction phase. Also, are any compounds proposed north of Barnham Road?
- Speed limit – Please provide information to demonstrate how the road would be suitable for the proposed 30mph speed limit.

In addition to those matters raised by WSCC Highways the following clarification is also sought;

- With reference to the comments of Arun District Council, WSCC Highways, Barnham and Eastergate Parish Council, and third parties, clarification is sought in respect of the figures used for traffic forecasts, and demonstration that these have robustly taken into account future planned demand resulting from both approved and future development of neighbouring allocated Barnham, Eastergate and Westergate site (SD5).
- Further clarification is sought regarding the consideration given to the potential effect of increases in traffic on the stretch of Fontwell Avenue from the new roundabout to the A27 and any potential for increased congestion.
- Outline details of construction routing should be provided within the CEMP.
- Clarify how/why uncontrolled crossings have been specified and the extent to which this has taken into account existing/proposed users and footfall.
- Clarify if all the safety audit recommendations been incorporated into the scheme.

Ecology

Please refer to full comments of the County Ecologist dated 6th December 2020. In addition to the general matters raised by the County Ecologist, the following clarification/further information is sought;

- Conclusions of the ES assume that the lighting can and would be dimmed and/or turned off for several lighting units during sensitive periods of Bat activity (in particular those proximate to the PROW crossing point). However, it remains unclear how/if this could be controlled, the duration of such periods, and whether reduced lighting would be sufficient to ensure highway safety. Please clarify and/or consider an outline lighting management scheme.
- Please clarify if sections are missing between 9.6.4 and 9.6.20 of the Environmental Statement? (For example, Table 9-21 refers to 9.6.15 in respect of landscape design response to hedgerow severance)?
- The consideration given to the potential for cumulative or in-combination effects on Ecology and Nature Conservation resulting from the future development of site allocation (SD5 - Barnham, Eastergate and Westergate) is unclear. Given the proximity to allocated future development land (in particular the Barratts David Wilson Homes development), and the potential for impacts upon ecological receptors/habitats which currently span both sites, further analysis of the

potential for cumulative effects is sought. This should include discussion of potential severance impacts and consider any preliminary ecological assessments undertaken for neighbouring land (e.g. as part of allocation and/or development proposals).

- There is a need to demonstrate the extent to which the proposed scheme has considered or may limit opportunities for integration into neighbouring future development sites. Where appropriate opportunities to mitigate any such impacts should be explored/identified.

Public Rights of Way (PROW)

Please refer to the full comments of WSCC PROW dated 11th November 2020. In summary clarification/further information is sought in respect of the following;

- Potential/need for the use of "look right" surface markings at pedestrian crossing points.
- Potential/need for the use of timber staggered barriers and fencing in paths at the proposed PROW crossing point.

In addition to those matters raised by WSCC PROW the following clarification/further information is also sought;

- It is suggested that temporary re-routing or diversion of the PROW would be required and that would be subject to further discussion with WSCC PROW. As a minimum, the likely diversion/closure options should be presented (and their expected duration) so that potential impacts can be considered.

Trees

Please refer to full comments of WSCC Tree Officer dated 9th December 2020. In summary clarification/further information is sought in respect of the following;

- Clarify if any future review of the Arboricultural Method Statement (AMS) could impact upon retained trees.
- Clarify the provision of any Arboricultural monitoring and site supervision throughout construction and proposals for a pre-commencement meeting.
- Landscape Plans - Clarify what is meant by '*Areas to retain maximum feasible amount of vegetation*'. How would this be determined and by who?
- A full detailed Planting schedule / Landscape strategy is sought to include and specify the following;
 - Reference to all relevant British Standards.
 - Extracts of typical planting layout matrices.
 - Confirmation that all plant material and seed must be UK sourced and grown and comply with all current biosecurity regulations.
 - With the exception of the specimen trees, all planting stock should be transplants;
 - There is no oak (*Quercus Robur*) included in the planting mixes – it should be a component of SW1. Replace silver birch or elder with oak or reduce percentages of other species.
 - Specimen trees – omit copper beech, horse chestnut and cherry plum; use oak, field maple and alder (*Alnus Glutinosa*) instead. There could be problems with aspen suckering so use white willow (*Salix alba*) instead
 - There are 10 species listed and there are to be 16 trees – in what proportion?

- Apple trees – there are numerous commercially available Sussex varieties. At least use Cox’s Orange Pippin instead of Golden Delicious. My understanding was that some orchard planting was proposed (at least 6 trees) to compensate for the loss of the traditional orchard, so it should use traditional varieties on a semi-vigorous or vigorous rootstock. (See also the comments of the WSCC Landscape consultant regarding the form of the Orchard enclosure).
 - Hedge mix – ensure field maple is specified for the avoidance of doubt. The planting rate should be a minimum of 3 plants per linear metre
- Address typographical errors and ensure all references to plans and British Standards are correctly labelled/referenced in the LMMP.
 - Clarify proposed swale planting (also referred to as ‘planters’). There is no description of what is proposed in the planting schedule. Please clarify/amend and ensure consistent across all plans.
 - Landscape drawings seem to show a new hard-surfaced path through a retained TPO tree (T30) – Please clarify?
 - Confirm or otherwise if detailed bespoke method statements are proposed for working and construction near trees.

Landscape

Please refer to full comments of WSCC Landscape consultant dated 1st February 2021. In summary clarification/further information is sought in respect of the following;

- The submitted LVIA requires more consideration of the potential effects on landscape character. The visual baseline requires some clarification and diagrams should be checked.
- More consideration needs to be given to the effects of the proposed lighting scheme.
- Where potentially significant effects have been established, there should be further discussion of potential mitigation measures.
- The landscape plans require more detail and to be shown in the context of the wider landscape and future development land to demonstrate green infrastructure linkages.
- The status/relevance of the Green Infrastructure Strategy needs to be confirmed and if necessary be reflected in the submitted plans.

In addition to those matters raised by the WSCC Landscape Consultant the following clarification/further information is also sought;

- Clarify what land identified as ‘temporary land use’ would be used for. Also clarify how/if this land and contractor compounds would be reinstated and the programme/measures to achieve this.
- Further clarification is sought as to how the proposed landscaping/planting proposals relate to the future development of site allocation (SD5 - Barnham, Eastergate and Westergate), consideration given to opportunities for integration thereto, and the extent to which the proposed scheme may impact upon future visual receptors.
- Landscape plans appear to show a ‘woodland core’ in the key, however, such features do not appear on the plans. Please clarify and confirm that up-to date

landscape proposals have been used for the purposes of other assessments (e.g. landscape/ecological impacts and biodiversity calculations).

- Landscape plans do not detail the proposed benches or other street furniture as shown on design plans (what is proposed in terms of bus stops?). Please clarify/amend.
- Details of all proposed fencing and gates is required, and clarification should be provided as to how/if fencing has been considered in the LVIA.

Drainage

Please refer to full comments of WSCC as Lead Local Flood Authority (LLFA) dated 18th January 2021 and the Environment Agency (EA) dated 19th November 2020. In summary clarification/further information is sought in respect of the following;

- Calculations for storage volumes have been based upon default values for the coefficient for volumetric run off (Cv) contrary to the West Sussex LLFA Policy for the Management of Surface Water. Detailed design should use a Cv of 1.0 for the impermeable area only. Additionally, an FSR rainfall model has been used in calculations rather than FEH.
- The LLFA is unclear why for Attenuation Basin 4, no betterment is proposed and reference has been made to WSCC Highway Drain Criteria and Document W5-074-A-TR-1 'Preliminary rainfall runoff management for developments'. A review of discharge at this location should be undertaken.
- It is not clear from the current proposals where run off from the isolated 7.8ha is now draining to? Reference E includes the statement: The proposed road alignment should therefore incorporate culverts with sufficient capacity to accommodate flows from the existing greenfield run-off. It is recommended that confirmation is sought that this run off has been taken into consideration in the downstream storm flow calculations.
- It is highly recommended that due consideration of the proposed Phase 2 development is allowed for in any SuDS features. Also, significant cost and time saving could be achieved by working with the developers by integrating the drainage schemes.

In addition to those matters raised by the LLFA and EA, the following clarification/further information is also sought;

- Please clarify the likely depth of water in proposed ponds and how/if this would be affected by seasonality.
- Design drawings (Appendix 3.1) appear to suggest that the layout and size of attenuation ponds has yet to be determined and would be dependant of future investigation/infiltration testing. This is echoed in the findings of the Environmental Statement which suggest that proposed drainage design would be dependant on further groundwater monitoring and CCTV surveys etc.

Noting the above, and the comments of the EA (who suggest both conditions restricting use of infiltration and that deep infiltration drainage methods would be unlikely to be supported), there is a need to demonstrate that the outline proposed drainage strategy would be deliverable/operable to the required EA/LLFA standards (supported by further investigation where necessary) and that the physical features of the outline drainage proposals would not be likely to change to any significant extent. In essence, there is a need to provide greater

certainty on the likely design of the drainage scheme to ensure that the proposed physical features are representative and thus to confirm the associated impacts considered by other ES disciplines (e.g. Landscape/ecology) are reliably based.

- With reference to the LLFA comments, further clarification is sought to demonstrate that due consideration has been given to any potential impacts on the future development of site allocation (SD5 - Barnham, Eastergate and Westergate). In particular there is a need to demonstrate the extent to which the proposed drainage strategy may sterilise or impact upon future development land as a result of any increased flood risk/drainage matters (e.g. altering catchments), and that extent to which the proposed scheme has considered or may limit opportunities for integration into both phase 2 and neighbouring future development sites (please also see the comments of 'The Southern Consortium' dated 15th December 2021).

Air Quality and Emissions

Please refer to full comments of Arun District Council, Environmental Health Officer (EHO) dated 1st December 2020. In summary clarification/further information is sought in respect of the following;

- An emissions mitigation statement that includes proposed mitigation measures which should equal the health damage cost, with mitigation options designed into the development in accordance with the Standard Mitigations and Table 2 of Air Quality & Emissions Mitigation Guidance for Sussex (Sussex Air Quality Partnership (2020) available at <https://sussex-air.net/ImprovingAQ/GuidancePlanning.aspx>);
- Table 6-13 and Figure 6-2 of the report incorrectly shows that ADC have an NO₂ diffusion tube (Bog 13) sited at Beechfield Park. This is incorrect, Bog13 is located on Rowan way at approximate grid reference 493409 101228. This may have an effect on the result of the assessment. Figure 6-2 also appears to show an NO₂ diffusion tube at the Nags Head which is also incorrect.
- Land immediately to the south of the proposed scheme has been allocated for future residential development, however, the air quality assessment has not identified this area as a potential receptor (Figure 6-4) and as such no such no modelling of pollutant levels has taken place for these planned new homes. It is important these are considered as part of the assessment and if required mitigation at an eastly stage identified.

In addition to those matters raised by the EHO, the following clarification/ further information is also sought;

- As highlighted by the EHO and set out in the Scoping Opinion of this authority '*The impact on the air quality of future residents of housing allocated to the south of the road must be assessed*'. Any assessment will a need to consider whether the proposed development may sterilise or impact upon future development land as a result of any increased emissions, and the extent to which the proposed scheme has considered (including any mitigation relied upon) or may limit opportunities for integration into neighbouring future development sites.

Noise

Please refer to full comments of Arun District Council, Environmental Health Officer (EHO) dated 1st December 2020. In summary clarification/further information is sought in respect of the following;

- Raw data relied upon for noise assessment to be provided.
- A number of properties with the potential to qualify under the Noise Insulation Regs are noted. These and possible mitigation measures (and what this may achieve) need to be clearly identified.
- Section 7.6.14 sets out the number of properties which would be affected by noise of various levels in the short term and long-term scenarios. It also states that in the short-term scenario, night time noise levels inside homes would be within the guidelines set out in BS8233. There is no similar reference to night time levels in the long-term scenario despite the number of dwellings affected by an increase in noise greater than 5dB being larger in the future years scenario as shown in tables A7.4.1 and A7.4.2. This should be addressed.
- There is no mention as to whether noise levels during the day would achieve the levels set out in BS8233 either inside the dwelling or in the outside amenity space at these dwellings. Modelled noise levels for both scenarios should meet the levels set out in BS8233 for both day and night times at all properties. If this is not achievable further mitigation should be considered.
- There does not appear to be any mitigation planned for these properties that are most adversely affected, especially in the long term. Please clarify.

In addition to those matters raised by the EHO, the following clarification/ further information is also sought;

- As highlighted by the EHO and set out in the Scoping Opinion of this authority *'The noise/vibration impact on future occupants of housing to be located south of the proposed road, and beyond Barnham Road to the south must be taken into account in the assessment'*. Accordingly, there is a need to demonstrate that due consideration has been given to any potential noise impacts on the future development of site allocation (SD5 - Barnham, Eastergate and Westergate) as a sensitive receptor. Given the proximity and noting the noise contours highlighted by figures 7-2 and 7-3, focus should be given to the Barratts David Wilson Homes development.

Any assessment will a need to consider whether the proposed development may sterilise or impact upon future development land as a result of any increased noise, and the extent to which the proposed scheme has considered (including any mitigation relied upon) or may limit opportunities for integration into neighbouring future development sites (noting the extent to which noise attestation may be most effective at source).

- Clarify whether the noise assessment has considered the removal of the bund alongside the Halo site.

Geology and Soils

Please refer to full comments of Arun District Council, Environmental Health Officer (EHO) dated 1st December 2020. In summary clarification/further information is sought in respect of the following;

- Sections 12.1.2 and 12.3.6 state that the geotechnical ground investigation, including contamination testing, would be undertaken and following this, a more detailed assessment of risk undertaken. Section 12.9.4, however, states that the risk to construction working has been categorised as 'low' and section 12.9.5 goes on to state that 'standard mitigation' will be required as part of the CEMP.

How/would the risk assessment be updated following the intrusive investigation and remediation measures outlined as required.

- The rationale for including the human health risk assessment in the CEMP needs to be explained. The risk assessment doesn't really sit within a CEMP as the contamination element is predominantly a risk assessment and not a management document and whilst there are overlaps, they are formed under separate legislation and codes of practice, etc. Please clarify.
- The authors and associated signatures (on the quality control page) are mismatched. Please clarify.

Lighting

In summary clarification/further information is sought in respect of the following;

- The submitted lighting assessment states *'designs have been based on the 2013 version of BS5489 and should be reviewed against the 2020 amendments'*. There is a need to demonstrate that the outline lighting scheme is likely to be deliverable/operable to the required standards and that lighting features would not be likely to change to any significant extent and thus to ensure associated impacts considered by other ES disciplines (e.g. Landscape/ecology) are reliably based.
- The submitted lighting assessment states it is *'recommended that lighting levels are reviewed at the detailed design stage with a view to reducing these levels where appropriate to do so based on; detailed traffic flow data and the low ambient luminance and environmental zone of sections of the Scheme (such as Fontwell Avenue)'*. As highlighted in the ecology and landscaping sections above, the ES seemingly assumes that the lighting can and would be dimmed and/or turned off; during late night hours; at certain bat sensitive locations (in particular those proximate to the PROW crossing point); and during ecologically sensitive periods. However, it remains unclear how/if this can be controlled, whether the luminaires specified in the Street Lighting Layout Drawings include such controls, which lighting installations would be subject to any particular restriction, the duration of such periods, the reduction in brightness likely to be required, and confirmation as to whether reduced lighting would be sufficient to ensure highway safety. Please clarify and consider an outline lighting management scheme.
- The Street Lighting Layout Drawings provide specifications for proposed luminaires, however, it would be useful for illustrative examples of such lighting to be provided. Further, noting that the assessment concludes at some properties that *'it is unlikely that existing vegetation or fencing in front of the property will provide screening from light intrusion or luminous intensity but may benefit from additional luminaire shields and louvers being installed for the lighting on the proposed roundabout'*, the drawings should clearly identify any luminaires where additional treatment would be installed, and the assessment needs to confirm that the effect of such mitigation would be sufficient.
- There are inconsistencies in highway layouts shown on the Street Lighting Layout Drawings and Design drawings (e.g. pedestrian facilities at the northern limb of Fontwell Avenue roundabout). Update/amend as necessary.
- With reference to the comments of the South Downs National Park Authority (dated 18th December 2020), clarification is sought as to whether lighting has been minimised in terms of the number and frequency of luminaires, and specifications to minimise the impact upon dark skies.

- There is a need to demonstrate that due consideration has been given to any potential lighting impacts on the future development of site allocation (SD5 - Barnham, Eastergate and Westergate) as a sensitive receptor. Given the proximity and noting the light contours highlighted by light spill contours as shown on the Street Lighting Layout Drawings, focus should be given to the Barratts David Wilson Homes development, and land adjacent (south) of the proposed Barnham Road roundabout.

Any assessment should ensure any additional mitigation is clearly identified (e.g. further shields/louvres) and the extent to which the proposed scheme has considered or may limit opportunities for integration into neighbouring future development sites.

Additional Information to be supplied (not requested under Regulation 25)

- Please clarify the rationale for the location of northern bus stop and associated stretch of footpath. What consideration has been given to the potential for the likelihood of crossing of the carriageway opposite the bus stop?
- It is noted that the description of development includes reference to 'signalised pedestrian crossings' which is not proposed. Please ensure any description of development is accurate to the development proposed.
- In addition to specific consultation responses referred to in this letter, the applicant is encouraged to review all consultation responses and third-party representations received in respect of the planning application (available on the WSCC website) and provide responses to the key issues raised.

In addition to the information detailed above, you will be aware from our recent discussions following the initial round of consultation that the application has raised concerns and requests for amendments/improvements in respect of proposed landscaping, ecological mitigation, and specifications proposed for the acoustic barrier. Accordingly, the applicant is strongly recommended that the following is addressed;

- Noting the findings of the Biodiversity Net Gain Assessment (and with reference to the comments of The WSCC Tree Officer/Ecologist/Landscape consultant, and the South Downs National Park Authority) the proposed landscaping and ecological mitigation strategy should be reviewed to seek to ensure performance against the BNG Good Practice Principles is improved and to achieve a 10% biodiversity net gain across the development.
- To reduce and where possible offset or compensate for any significant adverse landscape and visual effects, consideration should be given to further ecological mitigation and landscape enhancement opportunities as identified in the Ecological Assessment, the Green Infrastructure Strategy, and as raised by third parties and consultees. Examples include provision of hop-over planting, gapping up of surrounding features, extension of the LMMP periods, additional hedgerow planting (e.g. as boundary treatments at the closed Barnham Road Halo access, west and south of the proposed Fontwell Avenue roundabout etc.), replacement of the flint wall feature, additional tree planting, planting on roundabouts, improved replacement orchard design, consideration of additional wildflower grassland in place of amenity grassland, further cross-highway connections, and maximising ecological value of attenuation ponds.
- Consider opportunities to provide further planting to aid in softening the appearance and bulk of the proposed acoustic barrier, in particular from the west (road) side, should be considered. Consider potential use of climbers or use of a 'green screen' to further reduce the impact of this barrier.

- You will see from Parish Council and third-party responses that there have been several concerns, and in some cases disagreement, with the conclusions of the Environmental Statement and supporting technical appendices. This is particularly the case in relation to the landscape and visual impact assessment and impacts on ecology. We would therefore advise that you review, amend as necessary and update the assessments in the light of the preparation and submission of the additional information listed above.
- With regard to the design of the proposed acoustic barrier (which is currently unclear) it is recommended that you submit further justification of how the materials selected would ensure a structure that seeks to protect the character and quality of the area and contribute towards best practice placemaking principles, through high quality design.

Following our discussions, you will be aware that a Section 257 application will be required for the proposed permeant realignment of the exiting footpath (FP 318). Such an application, although must run concurrently with a planning application, is a distinct process and as such will need to be submitted under separate cover.

Where the further information sought would require amended plans, they should be allocated a new 'revision' number and any plans to be superseded should be identified. It is also advised that the information should be presented in a single supplementary submission.

We would be grateful for your confirmation of the likely timescale necessary to allow the applicant to respond to the above request and comments received from third parties/consultees, in order that an extended target determination date can be agreed. Can you therefore please confirm you anticipated timescale for the submission of the additional information by no later than 14th February 2021.

If you require any further clarification or if you wish to discuss the information requested, please feel free to contact me.

Yours sincerely



James Neave
Principal Planner
County Planning