

Heather Godsmark

Swallowfield, Eastergate Lane, Eastergate, Chichester, West Sussex

First application objection issued 15.12.2020

This revised objection issued 13.06.20- UPDATED By deleting unwanted text and new text inserted in red.

Coloured text in earlier objection is now black.

## OBJECTION

## COMMENTS.

### 1.0 PLANNING DILIGENCE

a) It is my understanding that Local Authority planning responsibilities are to manage, control and regulate development, balancing public and private development needs with the protection of amenity, and the environment in the wider public interest. In respect of this application, I am hoping that the WSCC planning officers will **remain** objective and robust when considering all aspects of this development scheme, acting fairly in the interests of all stakeholders.

b) As **resubmitted**, this Application **still retains significant** flaws, inconsistencies, missing or misleading information and fails to meet policies of protection of countryside, landscape character and community issues at all planning levels. I only point out a few of greater significance.

**I thank WSCC planning for recognising the need for and allowing this second consultation for public scrutiny of the revised scheme.**

c) I believe that the flaws, inconsistencies, missing and misleading information, together with significant failures to follow sound scoping opinions from WSCC and ARUN planners in respect of Cumulative Impacts to meet the Good Practice guidance claimed to have been followed, **remain** profound and substantial that this Road Scheme application **resubmission**. It needs:

- to be withdrawn and Cumulative Impacts **be soundly and** thoroughly reconsidered In accordance with **recognised** Good Practice over the whole of the BEW Phase 1 Land Package, as guidance from WSCC and ARUN planners required.

- to be redesigned and provide supporting documents to give consistent and clear information before any resubmission and invitation for further public consultation.

d) WSCC planners must act robustly in **re-scrutinising** this **resubmitted** application, given that their own and Arun DC's sound scoping guidance advice **remains variously** disregarded, **the additional cumulative impact information supplied is not determined from sound surveying evidence**, and require this currently flawed application to be withdrawn and reconsidered. For WSCC planners to act otherwise would be unacceptably unfair to the local communities and countryside, most impacted by this scheme and left confused and misled by **this much** flawed re-submitted application.

e) I attach **my revised consideration of the revised** scheme's **most harmful** flaws, inconsistencies and missing/misleading information, **some new and some retained** but I expect there is much more in the **revised** sections I have not had time to look at.

I request that this statement be lodged as an objection on the WSCC Planning Application Website against application WSCC/052/20.

## 2.0 CUMULATIVE IMPACTS:

WSCC Planners scoping opinion dated 2<sup>nd</sup> April 2019.

*'The scheme would come forward alongside large mixed-use developments in the area, so there is considered to be the potential for significant cumulative effects'*.

WSCC advice goes on to state:

*3.31, The Arun District Council response to the Scoping Request in relation to cumulative impacts should also be taken into account.*

a) Highways/WSP omitted to follow WSCC and ARUN advice and tailored their EIA Topic Study Areas to cover less challenging impact areas, and for some sensitive receptors, the area extents chosen were both illogical and outside recognised Best Practice.

Study Area extents for **most** topics, **such as ecology, remain the same as before and remain covering** little more than the New Road application land take, appearing to minimise issues which might hamper the interests of promoting the road scheme, thus avoiding some likely unwelcome negative outcomes which might highlight significant 'cumulative impacts' using a different study area extent. Examples particularly relate to landscape, drainage, wildlife and biodiversity.

b) DBRM LA 103 (rev 1) Scoping Projects for Environmental Assessment confirms that a cumulative impact may arise *from 'the combined impact of a number of different projects (in combination with the environmental impact assessment project) on a single receptor/resource'*.

There are significant sensitive receptors impacted inextricably by both the new road and the Barratt's housing site, which serve each other, are dependent on each other and occupy the same land package, which is visually and physically contained by housing along Fontwell Avenue, Barnham Road, Chantry Mead area housing, and to the N and NE, by Eastergate Lane properties, woodland and hedgerows.

**c) The impossibility of addressing environmental impacts for the new road separately from the impacts of the inter-related Barratts housing development is particularly highlighted within Arun's Scoping Advice of 09.04.20, which Highways/WSP were requested to take into account by WSCC planners, in their Scoping opinion of 02.04.19.**

WSCC/WSP advise in the application that their Cumulative Impacts study areas were selected to suit their own '*good judgement*', thus avoiding, as it suited their EIA process, local planners sound scoping advice.

**d) I note that within the Revised Environmental Statement Chapter 9 cl 9.8.3 states regular liaison with the Barratts Development site ecologist to ensure a combined approach to mitigation where feasible but nothing is evidenced and there is **no fundamental survey over the entire Phase 1 area so no claim that cumulative effects has been sufficiently investigated can be entertained and this work to the level of recognised Good Practice guidance remains outstanding.****

Since the revisions to this application have been so speedily produced, over just this spring/February, March and April, with resubmission on 04.05.21, such limited time cannot have produced anything meaningful in respect of any revised Phase 1 Whole BEW Area environmental/biodiversity cumulative effects investigation.

### **3.0 BIODIVERSITY**

a) Much of the Best Practice Guidance, which Highways/WSP **claimed** to have followed during preparation of the **original** application EIA, ecology issues, very clearly **directed** that the cumulative impacts of interrelated projects must be addressed. Such is repeatedly expressed in the most recognised EIA Guidance, claimed to have been followed: CIEEM Guidelines for Ecological Impact Assessment, many sections of the DMRB regulations and GLVIA (3).

b) Arun DC scoping advice received comments from Natural England. The following are extracted:

5.11 *'the importance of assessments considering the potential cumulative effects of the development with other relevant and existing or proposed developments in the area'* and using CIEEM Guidelines.

5.12 *'a large loss of habitat for badgers from both the A29 Realignment and the proposed housing ... best not considered in isolation of the effects of the road scheme'*.

5.12 *'there is likely to be a severance to and loss of bat habitat ... and recommends 'a combined approach' to addressing cumulative effects.*

5.13 *'mitigating impacts on reptiles ...to coordinate that with the A29 realignment'*

5.14 *'A combined approach on achieving biodiversity gains would be beneficial'.*

c) How could the importance of addressing cumulative impact on Biodiversity be more clearly expressed?

However, the habitat study area that Highways/WSP used for its EIA biodiversity impacts, was spatially restricted to little beyond the application red line zone and not extending out to cover the whole of the Barratt's site. I note that wildlife assessment failed to mention the presence of a thriving group of deer and biodiversity missed Ancient hedgerows. (latter confirmed in BEPC objection).

**Still no mitigation advice for the group of deer habituated to the Phase 1 area. Will these deer be pushed out into all the neighbouring properties to create havoc trying to establish a new home? Such is not a wildlife friendly solution or good enough. A more animal friendly option needs to be investigated within a revised application.**

e) With the A29 scheme coming forward first, before and separately from the Barratt's scheme, Highways/WSP should have accepted responsibility for assessing the cumulative developments impacts over the whole of the BEW Phase 1 land package. There is no Good Practice guidance suggesting that to do otherwise would produce acceptable EIA results. Additionally, with the road raised on a causeway, reaching up to **2.0m** above existing ground level on its eastern side as it passes Chantry Mead, the road inevitably and substantially divides and isolates habitats within the whole Phase 1 land package, from its easy access to the wider country side to N and NE. Also, the impacts of separation and restricted access to wider countryside will be compounded by road construction disruption. This applies to more wildlife than badgers.

**f) Not to undertake an EIA biodiversity study over the whole Phase 1 land package is a profound error and **remains** clearly harmful to local ecology and wildlife welfare. It is totally against CIEEM Good Practice and Natural England's early expressed views. This omission needs to be rectified before this application moves further forward, otherwise the Biodiversity section of this application EIA is worthless.**

#### **4) LANDSCAPE:**

Appendix 5.1: Scoping Report Pt 1 – reissued but not up-dated for revised Application.

Appendix 5.1: Scoping Report Pt 2/Pt 3/Pt4 – Ditto and so retains plans for road alignment and application red line, which were already out of date at the time of the original application.

Appendix 5.2 & 5.2b: Scoping opinion – reissued but not up-dated for revised Application.

a) WSCC Planners scoping opinion, 02.04.19, (contained in App 5.2, 3.3,) warns of the potential for adverse impacts to north and east, which will remain rural, and to south which is *'allocated for housing and recommends adherence to GVL1 3 Guidance'*.

WSCC planners Scoping Opinion in 3.31 requested *'The Arun District Council response to the Scoping Request in relation to cumulative impacts should also be taken into account'*.

Further in Arun DC's Scoping Opinion of 09.04.20 advice to Barratt's agent included:

5.16 *'A significant change to the local landscape will occur as a result of both proposed developments (ie realignment of the A29 and the proposed (Barratt's) housing. Co-ordinating the landscape and visual assessment and landscape design rather than undertaking an isolated approach, would benefit the place qualities, enable a more integrated landscape/townscape and reduce the impacts of both developments'*.

5.34 *'the proposed housing development and the A29 realignment are both promoted in the local plan and proposed for the same location'. ... 'where impacts/effects are similar co-ordinating design and mitigation would improve both proposed developments ... to reduce significance of adverse effects, ... one purpose of the EIA.'*

Arun DC was very clear, that a single co-ordinated and comprehensive approach to landscape impacts and mitigation design was needed, covering the whole of the Phase 1 developments land package. Since the road scheme came forward first this put the duty on Highways/WSP to undertake the co-ordinated approach for the whole Phase 1 land package.

b) Essentially, the road realignment scheme should not have come forward first, without co-ordinating and addressing EIA landscape impacts over the whole Phase 1 developments land package, to provide for co-ordinated and sustainable landscape and Biodiversity mitigation.

**WSCC has no excuse not to act in the best interest of the locality and local community it is charged to consider and respect, and in accordance with its own planners advice when seeking planning permission for its road scheme.**

**c) Isolating potential Road environmental impacts from others which will shortly arise over the rest of the Phase 1 land package, is clearly flagged up by Arun DC as ill-advised, and I suggest it to be significantly harmful 'bad' practice, against protecting the interests of the local environment and local communities.**

d) Within application text, the landscaping scheme is guided by ARUN's A29 GREEN INFRA-STRUCTURE POLICY (GIS) and the specifically stated objectives within that policy are repeated and reinforced elsewhere within the application documents text.

For example, the GIS promotes roadside amenity planting and planting to separate footpath/cycle ways from the A29 Road realignment scheme, for walkers and cyclists amenity and pollution control. App 8.2, 1.2.2 clearly describes *'Planting of trees in verges between the carriageway and combined footway /cycleway.'* and there are 21 different illustrated landscaped road sections to reinforce the design requirements.

**However, no such planting exists on the Phase 1 Road Scheme planting drawings. Various text references corroborate the provision of separation planting but it isn't anywhere to be seen on drawings nor included in plant schedules. I believe that such may have been included originally but later removed to provide for increased drainage capacity within roadside swales and requiring open access for clearance maintenance.**

#### 4) LANDSCAPE: continued

I note that the roadside 'raised planters' are removed and planting of scarlet willow and herbaceous plants are proposed for swales. As planting encourages silting up and capture/build up of organic matter, thus reducing holding capacity and filtration, I envisage a conflict between swale maintenance and landscape gain with the planting being the loser, given the challenging high water table conditions in parts of BEW Phase 1.

#### 5 DRAINAGE:

a) Arun DC's scoping opinion advice on drainage was quite robust and highlighted the need to address cumulative effects:

3.42 'Further, as confirmed by WSCC as Lead Local Flood Authority (LLFA), the road would be in an area of high seasonal groundwater levels', so 'full consideration is given to the site in the context of the wider allocation .... a comprehensive surface water management strategy is developed ... high risk of groundwater flooding'.

5.27 'While drainage for the A29 realignment and the proposed housing is likely to be designed separately, the future cumulative impacts on the water environment will need to be considered in the EIA for all adjacent developments.'

So, WSCC with their scheme coming forward first had the responsibility to account for 'the future cumulative impacts on the water environment' for the whole Phase 1 land area development package.

b) There are no SW sewers to serve the Phase 1 development area and Barnham is recognised as having high seasonal water table levels, requiring enhanced and specific SuDs system standards. A High Flood Risk Zone level 3 is evidenced in the application Flood Risk sections, spreading over the line of Barnham Lane Ditch, very close to Downview Road, Ewens Gardens, Chantry Mead and Merrell Gardens. Chantry Mead (DR/EG/CM/MG) has suffered for years from a failed developer installed SuDs system, for which no one takes full responsibility to rectify. With the new raised road causeway, **2.0m high opposite Chantry Mead**, cutting off natural land slope drainage **from North** and together with two new ('lined') balancing ponds, one overflowing into Barnham Lane Ditch and the other with no overflow provision except potential to flood over adjacent pony grazing meadowland, **there still appears to be risks of Barnham Lane Ditch and Chantry Mead area suffering periodically from flooding. I have seen no reassuring evidence presented for the specific area alongside East boundary housing where the raised road causeway is at its highest.**

c) A co-ordinated drainage scheme is not just advisable, it is good practice and essential to protect the interests of surrounding 'at risk' house and land owners. A co-ordinated design needs to be placed in the public domain for scrutiny, particularly to protect the interests of DV/EG/CM/MG housing which is clearly at increased risk of flooding by the Phase 1 developments.

c) Arun scoping advice, para 5.31, recognises '**climate change** as one of the biggest challenges facing the district....in particular through increased flood risk, declining water availability and increased health problems for those vulnerable to extreme temperatures.'

In application drainage correspondence, the risk of climate change enhancing rainfall events is mentioned as being a potential exacerbating factor to increasing flood risk. Also, I note a WSCC/WSP reference to **Arun DC being 'happy' to drop enforcing its Barnham specific SuDs drainage standard**, from applying to the road development. Such a concession is totally unsatisfactory and not in keeping with Arun DC's own Scoping Opinion. The Barnham special SuDs standard is important and arising from a history of flooding events in and around Barnham, and applying it rigorously will be becoming more important not less with raised flood risks from Climate Change.



#### **4) Drainage: continued**

d) Various, within the **original** New Road Application documentation, there are expressed assumptions that *'flood risk won't be enhanced'* by dropping the Barnham SuDs standard and get out of jail comments referencing that if any requirement for drainage changes are identified from on-going data monitoring results, those changes can be made later. This approach raises significant uncertainty about the effectiveness and capacity of the new road drainage design AND it can't be other than reckless for our local WSCC authority to assume it can award itself permission to opt out of current important SuDs standards applying to all development in and around the Barnham with its high water table risk. **It may be hidden somewhere but I have seen no reassuring commitment that the Barnham special SuDs standard will not be relaxed?**

e) **Applying double standards, and against good practice, to facilitate the delivery of a local authority controlled road development, against the best interests of the BEW local community (which our local authority is charged to protect), is totally irresponsible. A co-ordinated Phase 1 land package drainage system must come forward to allow the already 'at high flood risk' property owners to be confident that their interests are protected, in terms of their stress welfare, enjoyment of their properties, maintenance of property values and uninhibited house selling opportunities. Additionally, Barnham Road residents and its travellers need to be given similar confidence that the regular flooding events on that road, will not increase. I note that additional work is identified to protect Barnham Road within the new application but what about areas and housing NE of new road where northern surface water run-off will be directed by the natural fall of land and the cut off effect of the new road causeway.**

f) **WSCC Planners need to be robust in insisting on their own 'good practice' drainage design advice, reinforced by Arun DC, to get a co-ordinated BEW Phase 1 area SW Drainage scheme, properly researched and designed. Without a comprehensive cumulative impacts drainage system design coming forward, to meet current applicable Barnham SuDs drainage standards, this road development application should be refused.**

#### **6 APPLICATION ERRORS & INCONSISTENCIES.**

a) There are many obvious errors and inconsistencies between different application documents which may have resulted from scheme design changes not adequately edited through all documents, such as in;

- study area descriptions, Habitat Survey, Post Development Habitat assessment resulting in Bio Diversity Net Gain miscalculations.

- **New inconsistencies have arisen from some documents being retained from the first application without update and cross checking against new and revised documents in this latest resubmission. This is fundamental to clarity and I have noted three different Red Line Boundaries presence within this application resubmission.**

- **It would appear that various baseline data, by which this current application should be underpinned, is no longer viable. For example, the 'not updated' long list of committed developments is no longer 'fit for purpose' since it does not pick up on all impacting nearby future developments, promoted since the last application submission. For example, the paddocks immediately north of Eastergate Lane are now identified for housing development within the latest Barnham and Eastergate Neighbourhood Plan, requiring yet another new access onto Fontwell Avenue to increase and exacerbate traffic congestion between the A27 Roundabout and the proposed new A29 roundabout on Fontwell Avenue, immediately south of Eastergate lane.**

- **I have no doubt that predicted baseline traffic data similarly are overtaken and not fit for purpose.**

**I note that all the landscape strategy drawings, plant schedules, and landscape road sections are updated but not the thoroughly misleading Fly-Through Video which remains on the WSCC planning website. It still shows low traffic levels without an HGV in sight, impressive and comprehensive landscaping up to all boundaries and including planting around northern and southern roundabouts, played against distinctly soothing pastoral music and without an engine to be heard. This is fantasy not reality and totally deceitful.**

## **6 APPLICATION ERRORS & INCONSISTENCIES.**

### **b) Site Descriptions, Habitat Survey, Post Development Habitat Assessment and Biodiversity Net Gain.**

App 9.1 Prelim Eco Report (**Not updated**) identifies 'extensive orchards to the north and hedgerows all of which are Habitats of Principal Importance (HPI)', and having 'potential to support a range of protected and notable species, including bats, badger, hazel dormouse, wintering and breeding birds, great crested newt, reptiles and invertebrates, as detailed in Section 4.'

1.1.6. In order to assess the ecological impacts of the Proposed Scheme, a 'Survey Area' was identified to include the Proposed Scheme footprint and areas set aside for landscape enhancements and mitigation works, the extent of which is shown on Figure 1. (**Not updated**)

**So, a very limited Habitat Study Area extent was chosen, thus avoiding addressing cumulative effects arising from development of the whole Phase 1 Land package, and the knock on effects the road scheme might have to habitats to the north, through the fragmenting of the immediately adjacent, existing large open 'Green field' area and its valuable ecological features.**

1.1.8. Land within the Survey Area has also been subject to ecological survey in the recent past. An existing Phase 1 report for the Site (WYG, 2016) has been considered in the assessments. However later it is noted that 'anything over 18mths-3 years cannot be relied upon', for use as sound baseline evidence. **So This earlier baseline evidence is now even further outdated.**

5.1.3. The Survey Area contains a range of habitats including some of elevated ecological value such as traditional orchard and hedgerows, which are considered to be HPI (High Protection Importance) (the loss of which must be compensated for).

### **c) App 9.9 5. Habitats Regulations Screening Assessment**

In Conclusions, 5.1.2 states 'No in-combination effects with surrounding devs (namely the BEW allocation) are anticipated'.

This conclusion **remains** incomprehensible and appears totally wrong, given that the survey Study Area is clearly inter-relationship with the Barratt's housing scheme, both occupying the same discreet land package with specific habitat types extending continuously and uninterrupted, over both development areas and the ultimately fragmented greenfield land to N and NE.

The Chartered Institute of Ecology and Environmental Management (CIEEM) sets out the Good Practice Guidelines for Ecological Impact and assessment in the UK and Ireland. It requires an assessment of Cumulative impacts and effects, (on biodiversity). Significantly its guidance highlights importance of assessing cumulative impacts 25 times.

to: 'Identify any other projects which could give rise to a significant cumulative effect. Describe and assess any potential cumulative effects and determine whether they would be significant or not (and in which geographical context). Provide a robust justification for the conclusions reached.'

This **still** has not been undertaken by Highways/WSP since it avoided looking beyond the application red line zone.

**d) I note that the Habitat Survey does not identify any presence of Ancient hedgerows (see BEPC objection) and that there is no 'orchard habitat' identified on the survey plan, despite its recognised Habitat Protection Importance status. Implementing orchard replacement, presumably to meet HPI requirements, is mention several times in the application text, but to my mind 3/5 apple trees at 30ms centres, mixed in with various non-native exotics, does not compensate in any way for lost HPI orchard habitat. The remaining immediately adjacent, existing traditional orchards have a planting density of 200 apple trees per (acre) 0.4ha, not just 5. Additionally, since there will be later, further significant HPI orchard loss from later Phase 1 land package development, the avoidance of assessing the wider area for cumulative impact on habitats totally fails to meet CIEEM Good Practice, as claimed to have been followed.**

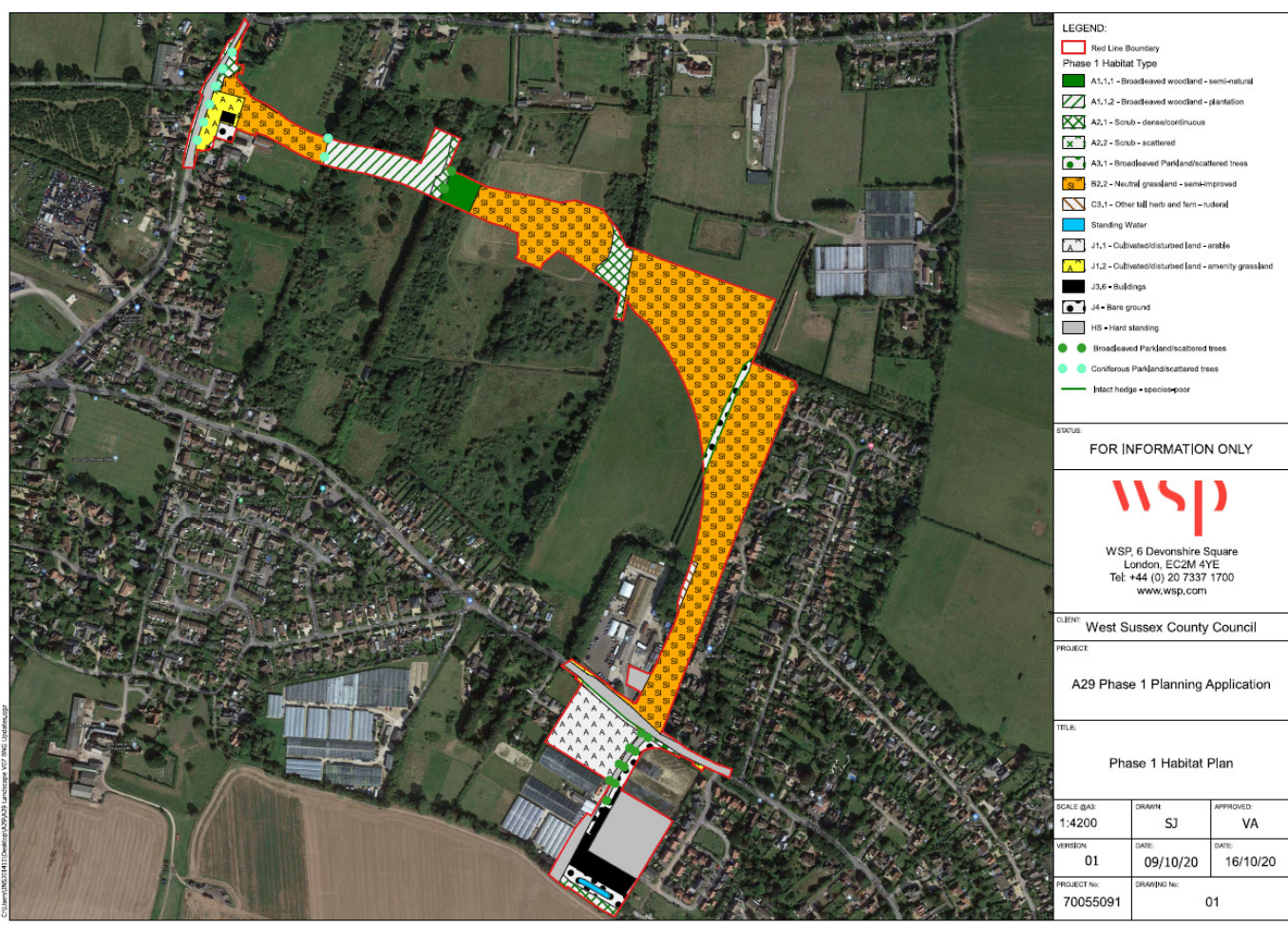


**6 APPLICATION ERRORS & INCONSISTENCIES continued.**

e) Habit Survey Results

App 9.10 Bio Diversity Net Gain G Final Assessment evaluates the bio diversity losses and gains related to the new road development design and appraises the soundness of the design methodology and design elements. It is updated with a technical note confirming extra hedging is now proposed to reach a 10% BioDiversity Net Gain. However, since the original BNG calculations identifying a shortfall in hedging were flawed achieving this earlier identified BNG deficit by adding a bit of extra hedging doesn't hold merit.

The retained BNGA Executive Summary confirms that 'the biodiversity value of existing habitats has been quantified using the: Natural England Biodiversity Metric 2.0, 2019 on the basis of comparing the identified existing habitats present on site (Appendix, Figure 1) and those proposed under the current design of the post-development landscape design (Appendix B, Figure 2)'. I note that both habitat plans were issued 09/10/20, so quite close to application submission.

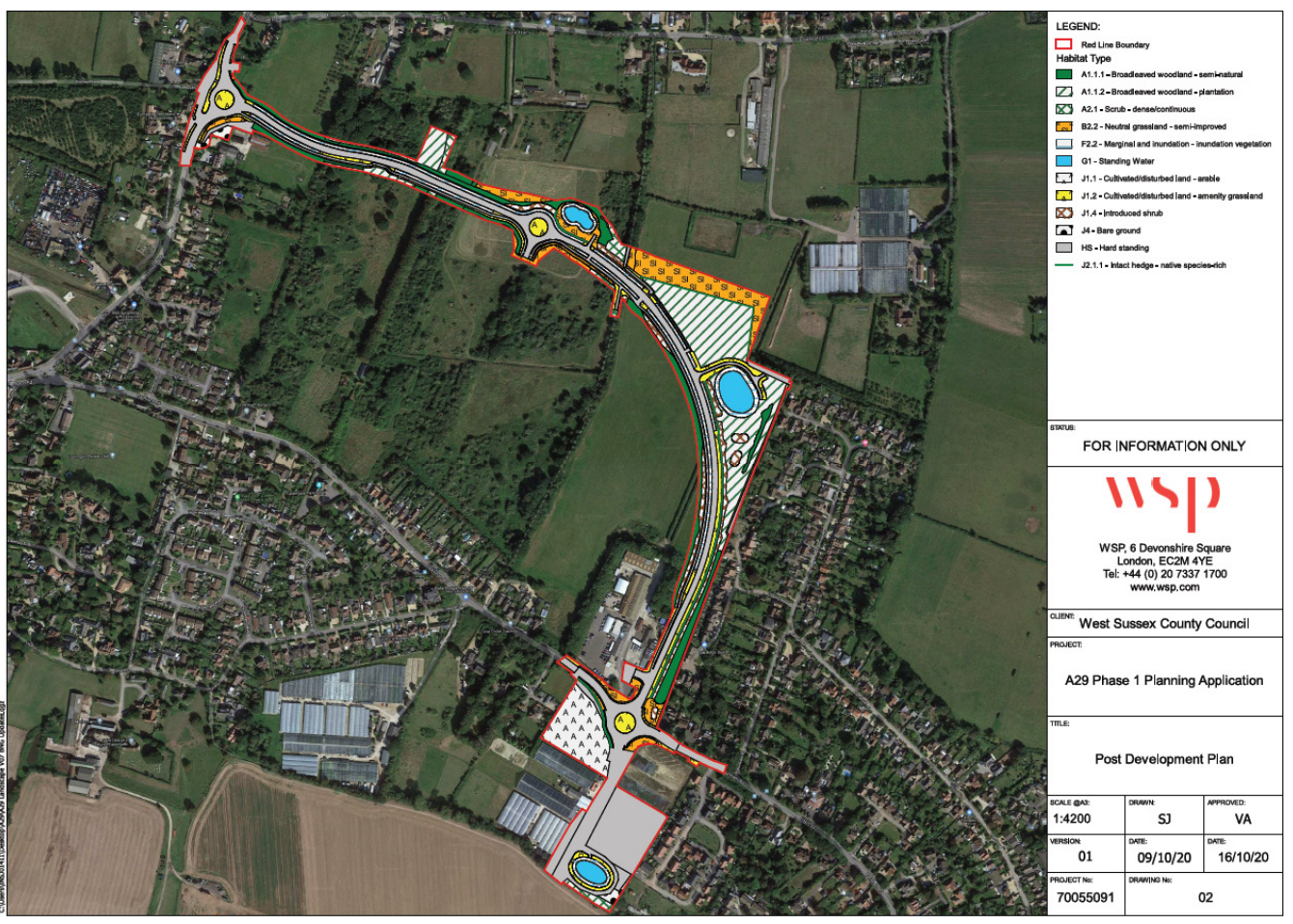


The above Semi-natural and Plantation Broadleaved Woodland patterns, existing habitat identities, (solid Green and Green horizontal stripes), are carried forward for use on the Post Development Plan, to identify proposed mitigation habitat types, taken from the application landscape drawings.

App 9.10 (Bio Diversity Net gain Assessment Final) stated that the Post-Development Habitat Plan was digitised from the WSP Soft Landscape Plan drawing no. A29-WSP-LAGA-001 - Version 7-06.10.20 (WSP, 2020) received on 05 October 2020.



## f) Habit Survey Results continued.



Comparison of the Post Development Habitat Plan against the **earlier** Soft landscaping drawings and associated plant schedules, reveals substantial inconsistencies.

There is **woodland edge** planting indicated on Soft landscape drawings and in associated plant schedules, comprising smaller growing native trees and shrubs. However, there is **no woodland core in the soft landscape proposals**, though I note it remains identified in Drawing (pattern) Key. Additionally, provision of Woodland mitigation planting is variously mentioned throughout the application documents and identified on the Post Development Habitat Plan but there is no **woodland core mix** on scheme soft landscaping or in plant schedules. **So there will be no mitigation woodland, as claimed variously throughout application texts, and accounted for in the earlier BNG Habitat calculations, to replace that lost and to restore connectivity with adjacent woodland.**

g) ARUNS A29 GIS Planting planting guidance is:

*'Design with native planting palettes. In general, plant species should be context-sensitive and in keeping with local species. Trees should be of local provenance where possible, particularly in areas adjacent to agricultural fields and other native habitats.'*

The area identified as 'Broad leaved woodland plantation' habitat on the Post Development Habitat Plan is almost one hectare but on the **first application** landscape Strategy drawing it is identified as Wildflower Meadow, with 11 'specimen' trees spaced approximately 30metres apart. From the plant schedules, out of these 11 trees, beech is the only climax native woodland species and its more suited to drier Downland than wet meadowland. Others included are smaller growing natives, commercial apples and larger growing 'parkland' exotics. Not an oak in sight, yet oak is the most important local woodland climax species best suited to this site? **I note that exotics are removed and replaced on the latest landscape strategy drawing.**

## **6.0 APPLICATION ERRORS & INCONSISTENCIES.** Continued

h) Arun's Green Infra-Structure policy (GIS) is included in the application and it sets out an aim for sustainable developments to provide a *Biodiversity Net Gain of 10%*. The road development scheme is claimed '*to achieve a net gain in Area Based habitat Units (+44.53%) and a no net loss in Hedgerow units, (+3.85%). It acknowledges a failure to gain the full 10% additional hedgerow, and goes on to suggest this is for reason of lack of land.*

**i) The Biodiversity Net Gain calculations are based on comparing the existing and post development habitat plans, and since the scheme landscaping drawings do not correspond with the Post Development habitat Plan, the BNG calculations are meaningless. They only serve to indicate that mitigation woodland was once included in the scheme proposals but now is omitted.**

**The BNG calculations remain without merit and adding more hedging in the latest scheme does not prove a 10% BNG gain is achieved. Considering the wealth of habitats existing over the whole of Phase 1 Area, I do not believe that following development any BNG gain would be possible given the extent of wildlife habitat loss. For this reason, escaping doing a whole of Phase 1 Area habitat survey is reprehensible and should not be acceptable to WSCC planners.**

I note that on the recent updated application Landscape Strategy/planting schedules;

- some oaks are now included in mixes and exotic tree species are removed.
- the large rectangular badger underpass area is no longer shown to be woodland planted. This omission is incompatible with Badger Trust advice for dense planting along underpass approaches, to give badgers security, and further undermines validity of continued use of the fundamentally flawed BNG calculations.
- the new drawing shows a very small extension of woodland edge planting by Ewens Gardens.
- all the woodland edge, scrub and hedging uses 40-60cm tall at planting. Whilst this might be acceptable in undeveloped open countryside, it will not produce any significant landscape impact to compensate for landscape and local amenity loss within the next decade .... and that is assuming that a significant percentage of plants do not die off annually during prolonged dry spells. Droughting off will be a particular risk on the causeway slopes.
- The illustrative landscape sections show planting at least 30 yrs maturity .... probably not to be seen in my lifetime or in many others! Plus, the illustrated tree spacing does not clearly accord with the planting plan.
- I note that there is **no cross section drawn between DD and EE**, which would indicate how adversely imposing the 2.0m raised causeway road, with 3.0m ht rusty steel barrier above, would be in views from the rear of Chantry Mead and other nearby dwellings. This omission is beyond being disingenuous - it is disreputable and hides the impact which should be clarified to affected residents.
- The only trees of any significant planting size are the **3No 12-14cm girth\* 3-3.5m ht Field Maples**, (\*mis-described as Extra heavy Standards).
- the earlier proposed 11 No Specimen trees are now increased to 25No, with probably 9No of those apples in remembrance if lost orchard habitat. The specimen trees are described as standard trees with clear stem of 2.5m but no girth measurement so no correlation with National Plant Specification standards.

**j) Speculating why 'woodland core' planting may have been removed, I suspect that enhanced SW drainage concerns demanded a substantial increase in land take to provide for raising the road causeway embankment, more flood water meadowland and more extensive swales; all to the detriment of comprehensive mitigation landscaping and habitat restoration proposals.**

**k) Additionally, I am left wondering whether Highways/WSP assumed that their EIA was just an exercise that must be undertaken, not necessarily needing to be accurate, (since their study area was so illogically restricted) or meet the objectives of good practice guidance given in CIEEM and GIS, and directly advised by WSCC and Arun planners. Did Highways/WSP assume an approval to be automatically forthcoming?**

**L) Where are the planting proposals to integrate the new roundabouts into our existing Fontwell Avenue and Barnham Roads?**

**Where are the extra heavy standard and semi mature trees required to take the edge off the harsh intrusion of this new road into our village roads and make good landscape amenity.**

**The planting proposals indicated in this application for development over 11ha are miserably thin and unacceptably low budget. Our local environment and our community will suffer its biggest environmental changes and deserves much more than this minimal landscaping approach.**



## **6 APPLICATION ERRORS & INCONSISTENCIES.** Continued

m) Given such extensive application confusion, how can the public be able to consider the implications to their interests arising from this scheme?

I hope WSCC planners **remain** robust in assessing this **still** 'error ridden' application and not minded to expedite it. Any planning application produced by our own WSCC authority must be properly prepared, in keeping with planning policies and applicable existing regulations, in accordance with good practice, particularly since its own WSCC planning department will be responsible for scrutiny and decision advice to our WSCC councillors. Our WSCC councillors will not have time to scrutinise this application and will be relying on the due diligence of WSCC planning officers.

## **7 MISLEADING INFORMATION**

a) WSCC Website 'Fly Through' Video:

Please see the first **BEPC consultation attachment** to appreciate how little of the landscape mitigation planting in this video, shown at maturity of 30-40 years hence, is evidenced within the **original** road scheme landscape proposals and **the same differences still apply to the revised Landscape Scheme.**

Local people were directed by the WSCC project manager, to watch a WSCC Website Fly Through Video of the predicted completed road scheme, so that they could appreciate its appearance within its local setting.

This video is set against calming background music, **so no stressful traffic noise**, and shows:

- unrealistically low levels of evenly flowing car traffic, one bus and there is absolutely no sight of any HGV's, tractors and farm machinery.
- a sunny summer's day, with large growing trees at about 40yrs maturity, in woodland and along the roadside, much of which is not evidenced on the scheme soft landscaping drawings.
- extensive planting around Fontwell Avenue and Barnham lane roundabouts, around Halo and SPR commercial sites, none of which are indicated on soft landscape drawings or included in schedules.
- attractive amenity balancing ponds, which to be effective are more likely to be empty and looking like muddy craters on most summer's days.
- an above traffic, eye line view, is presented resulting in the extensive and massive visual impact of the 3.0m height, rusty wall, noise barrier, being visually diminished .
- peripheral mature screening tree belts are in place to protect amenities of existing dwellings abutting the west, south and east boundaries of the whole BEW Phase 1 developments land package; the missing 'elephant in the room' is Barratt's housing development with its extent innocuously indicated as beige coloured, flat land surrounded on west, and south sides with boundary mitigating planting, which is not part of the Phase 1 road scheme.

**This missing 'elephant in the room', the missing Barratt's housing development, will have significant cumulative effects on the local landscape, its character and its community, since it is inextricably visually linked to the road serving it.**

## **7 TRAFFIC CONGESTION & COMMUNITY WELFARE ISSUES**

a) An assessment of traffic data errors is appended to the **first** BEPC Objection, indicating that the traffic forecasts Highways/WSP are relying on count data approximately 300% below that which can be realistically expected from the extent of housing developments forthcoming in and around the BEW locality.

**Further housing development has come forward since the first application was submitted so predicted traffic data, particularly between A27 and New A29 Northern roundabout, will be wrong.**

**Accordingly, any impacts analysis used by Highways/WSP in support of their road scheme design, based on their traffic figures are unreliable and will substantially underestimated Traffic volume impacts.**

## 7 TRAFFIC CONGESTION & COMMUNITY WELFARE ISSUES continued

### ACCIDENT RISKS

b) Aruns A29 GIS Strategy states 'create inclusive junctions that can accommodate pedestrians, cyclists and equestrians'.

DMRB GG 142 guides the Walking, Cycling and Horse-Riding Assessment & Review. (WCHRA)

'The aims of carrying out a walking, cycling and horse-riding assessment are:

- 1) to gain an appropriate understanding of all relevant existing facilities for pedestrians, cyclists and equestrians (users) in the local area;
- 2) to provide background user information that can be referred to throughout the development of the highway scheme;
- 3) to identify opportunities for improvement for users.'

c) GG142 Scope 1.2 confirms that this A29 New Road Realignment Scheme will not qualify to be exempt from an Assessment and Review of WCHR.

**I am surprised that the lack of a WCHR was not picked up by the Road Safety Audit, demonstrating lack of rigour and due diligence.**

Not to have assessed the needs of WCHR and the vulnerable living within our Eastergate, Fontwell and Barnham villages within the resubmitted application, falls far short of Good Practice. This application must not be allowed to proceed without this vital issue being addressed. UK will soon be open to allow surveys to be done and local schools, doctors surgeries, physios, our Hft Care village and local communities could all help provide useful and accurate data.

Without undertaking a WCHR Assessment and Review, how could Highways/WSP possibly conclude that it would not be necessary? The local area has horse racing and many types of stables. Many people walk and sometimes cycle when traffic is heavy, to reach facilities at each end of Fontwell Ave, schools, doctors, post office, recreation ground, play grounds, shops, eateries and bridleway access into Slindon Woods; plus our church, village hall, physio .... All our facilities will sit north and south of the new Fontwell roundabout and will only be reachable by crossing the eastward arm of the new realigned A29. There is Govt and LA policies designed to encourage cycling and walking instead of driving and the new road cuts through a long established Public Footpath. A similar situation applies along Barnham Road. WCHR in both villages communities are equally adversely impacted since both roads have only one continuous roadside footpath being cut through by this new road at its access roundabouts

c) HIGHWAYS/WSP have described a provision for controlled crossings in their Application Scheme summary, but I note this is now removed. However, no controlled pedestrian crossing points are identifiable within the resubmitted road scheme details. The application states: 'does not foresee a raised risk of traffic accidents' and a WCHR survey was considered un-necessary within the scoping review, that is without any evidence to support this decision against GG 142 requirements.

**For the resubmitted application Highways/WSP Were Not completely unaware of the Hft Care Village, along Eastergate Lane, providing residential accommodation for disabled adults, who, in normal non-covid times, are able and do walk unsupervised down to Eastergate Village Centre Post Office. Rights of access for the disabled should be supported within this road scheme through the provision of safe pedestrian crossings, both on Fontwell Avenue and Barnham road, to allow the most vulnerable residents to continue walking safely through their community, even if this road scheme is developed. This will adversely affect the predicted 1 minute journey time improvement on a trip to Bognor but that holds no weight against properly carrying out a WCHR assessment.**

Covid **did** significantly impacted WCHR patterns in our community. **Now**, I notice that the 'less able' in our communities **are beginning to** regularly walk along our footpaths and there are more family recreational cyclists using our roads. A meaningful WCHR/ vulnerable adult and child assessment must be undertaken to inform this new road design.



## 7 TRAFFIC CONGESTION & COMMUNITY WELFARE ISSUES continued

### NOISE, POLLUTION & CONGESTION RISKS

c- cont) With the new road and housing, traffic is predicted to rise by 30% down Eastergate Lane, a lane without footpaths or visibility at its junction with the A29. Passing regularly down Eastergate Lane are school children, adults from the Hft Care Village, a disabled lady on tricycle and a wheelchair bound gentleman lived near to the A29 Lane junction. There will be others. All these vulnerable people need to access safely the length of the Fontwell Avenue Footpath to get to shops, doctors, schools, physio, recreation, post office, church, etc. Not to provide a safe passage for existing communities, never mind the many forthcoming new residents, with a controlled pedestrian crossing across an already and increasingly congested road does not make sense. It is disrespectful and an accident waiting to happen. Isn't it a human right for there to be disabled access provision in public places ... does someone have to die first to get it?

d) The WSP App 5.2 scoping opinion 3.3 advises that: *'no significant adverse environmental effects are expected to arise on population and health'*.

By underestimating forecasted traffic volumes by approximately 300%, (See **first** BEPC objection) there will be significantly increased congestion, particularly along the northern stretch of Fontwell Avenue, which will take all increasing traffic travelling accessing both the new and the existing A29 routes, between the new Fontwell Avenue Roundabout and the A27 roundabout. This increased congestion will enhance adverse impacts of noise, pollution and stress to both passing WCHR and Fontwell Avenue householders. There will be similar enhanced impacts along Barnham Road too, until the Phase 2 Road Section is completed.

**These 'cumulative' impacts on existing village roads, particularly affecting upper Fontwell Avenue are totally ignored within this application. The harm to community health and welfare should be considered to investigate what improvements can be provided to overcome increased cumulative impact harm to existing communities. There needs to be public understanding of any associated harmful community impacts arising from this new road and how they will be mitigated.**

d-cont) A new development site is now included within the BEPC Neighbourhood plan, to be served by yet another access off the northern stretch of Fontwell Avenue. This development proposal came after the last submission so will not be accounted for in the application predicted traffic data. I note that there is recognised adverse noise impact on east of new road residents but I see no mention of any need to consider and protect the amenities of the existing Fontwell Avenue householders who front on to the 'A29 traffic bottle neck' and suffer even greater traffic congestion ... noise, fumes and reduced access. **I note that consideration of future development residents appears to hold more weight than that for our existing communities.**

e) Within various Application Text, separation planting for amenity and pollution filtering is promised along verges between new Foot/cycleway and the road. As given elsewhere, this separation planting is a major objective within Aruns GIS, illustrated in 21 separate road sections.

*'Provision would be made within the design for cyclists and pedestrians and will consider inclusive design.'* but, alongside the new road, none of the roadside amenity planting promised, to filter pollution between road and cycle/footpath, is being delivered although I note it is recommended 21 times in pictorial section details within the Arun A29 GIS strategy.

## **7 TRAFFIC CONGESTION & COMMUNITY WELFARE ISSUES** continued

### **NOISE, POLLUTION & CONGESTION RISKS** continued

#### f) NEW ROAD CAUSEWAY & NOISE BARRIER

Noise impacts arising from this New Road will significantly, but indirectly, impact upper Fontwell Avenue **at its 'bottle neck'** and Barnham Road but for housing within Downview Road, Ewens Gardens, Chantry Mead and Merrell Gardens, the current road design will have intolerable **impacts on their amenities**.

ARUN'S GIS A20 promotes:

Design Opportunity: Minimise noise levels:

- Consider the use of green acoustic barriers at the southern end of the Phase 1 Site where space is limited
- Along the Proposed Scheme, there is a balance to be struck between the visual amenity of adjacent visual receptors (particularly residents) and users of the highway corridor - including pedestrians and cyclists.
- The positioning of green acoustic barriers needs to be close to the noise source (the traffic) whilst not impinging on possible space for the adjacent paths. Acoustic barriers can be a physical separation between the Proposed Scheme and surrounding communities, so it is important to try and maintain connectivity across and through the Scheme.
- Where an acoustic barrier is needed, the alignment of the carriageway should be designed to allow the maximum amount of space to the side of the carriageway where a buffer is required. This will enable planting to be used as a noise buffer or planting to act as screening to conceal an acoustic barrier. Where which will reduce the overall height of the barrier.

**Clearly ARUN's GIS A20 challenges Highways/WSP to design a Green Acoustic Barrier along the eastside of the Phase 1 new road, towards its southern end, as it passes by Downview Road, Ewens Gardens, Chantry Mead and Merrell Gardens and they should be held to meet this challenge.**

g) The Application Planning Statement states:

*4.4.1 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 existing ground profile in general falls from Fontwell Avenue towards Barnham Road.*

*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.*

Capita issued detailed road scheme drawings on 30.07.20 including sections and ground profiles along the road alignment. These are very technical drawings so the public will most likely have missed crucial impact details of the raised road design, which will apply to them. **The WSP resubmission illustrative sections fail to include sections covering the most impacted householders, living alongside the site east boundary.**

h) The road cross sections drawn up by Capita & **new illustrative sections by WSP** are carefully selected to avoid the position of highest road level, **(up to 2.0m above EGL)** coinciding with the curving stretch as the road passes beside Barnham Lane Ditch, Ewens Gardens, Chantry Mead and Merrell Gardens, (EG/CM/MG) and disingenuously, Capita & **WSP on its new illustrative sections show** all existing ground levels on all its road cross sections to be flat, which hides the actual differing level changes created on each side of the elevated causeway, resulting from the easterly downwards slope towards Barnham Lane Ditch and the adjacent east boundary housing.

Appreciating the magnitude of the east side embankment heights can only be gathered from a close examination of the technical drawings, which is unfair to the public, particularly on those most impacted. The causeway east side banking rises to over **2.0ms** close by the EG/CM/MG housing and this is not described in any way to allow any level of public understanding. **The WSP illustrative drawings in resubmission similarly do not allow any realistic understanding of actual impacts on local residents and the screen planting is shown fully established at about 20-30 yrs growth.**

**7 TRAFFIC CONGESTION & COMMUNITY WELFARE ISSUES** continued**NOISE, POLLUTION & CONGESTION RISKS** continued

h-cont) Highways/WSP description of the raised road being *'built on a small embankment'* would fail to raise public concerns about the high level proximity of the road and its associated Noise barrier, passing close by east boundary housing ... which is totally unfair.

i) Throughout the application documents, there are comforting words about mitigation screen planting alongside the rear east face of the noise barrier, but, at the worst visual impact position by CM/MG, the full 3m height of the noise barrier, and 600mms or more of the causeway bank, will be clearly visible over the garden fences, from gardens and house windows. Many fences are less than the 1.8m but are lower and visually open post and rail. Additionally, there will be no screen planting between bank slope and garden fences, where access for maintenance clearance of Barnham Lane Ditch will be required.

One might argue that planting on the bank will provide, over time, effective visual screening to the **rusty metal** barrier screening, but on a raised compacted bank the growing conditions will be very challenging, particularly during hot summers (such as 2020), and more likely to occur with climate change. No-one will be regularly summer watering any of the rear of causeway bank planting and the given maintenance/failed planting replacement commitment ceases after just five years. Certainly, it will take many more than 5 years for establishment of effective plant screening, even if there could be a high standard of maintenance. There is land drain running along the bottom of each side of the road causeway banks, which is likely to become blocked with roots from bank side planting over time seeking water and encouraging flooding. **I note that two of the three climbers offered in the new scheme to screen the rusty fence are inappropriate since they are not self-clinging so unlikely to gain wind fast hold on the fence and are deciduous.**

I am of the opinion that the visual harm this road scheme will have on Chantry Mead and Merrell Gardens residents, in terms of normal enjoyment of their properties, will be substantially compromised by the present of such a high embankment and unattractive noise barrier, totally blocking their westward views. As a result, their house values and selling opportunities will be significantly diminished. **I remain convinced** that this road is far too close to these houses and needs to move westwards, taking more of the Halo site and with a more landscape and community setting friendly noise barrier design evolved. **It is not just the style of the fence that is offensive but its overpowering finished height of 5m/15' closely over powering rear garden and dwelling views.**

J) In considering the suitability of this rusty acoustic barrier, I think it is helpful for planners to review the 'local upset' reported in the Littlehampton Gazette (below insert) about a 3.5m ht rusty metal acoustic fence and discussed by Arun on May 18th. Clearly, other local communities are offended by the appearance of a rusty metal fence overlooking their gardens and dwellings ..... and I believe the visual top of fence height is lower on this reported unsightly fence at 3.5m than the approx 5.0m alongside Chantry Mead.

***'Developer Persimmon is building the Fitzalan Link Road, which will run past The Littlehampton Academy and eventually join up with the new Lyminster bypass at the A259. As part of that work, permission was given for a fence to reduce the noise of the traffic, which is being built right behind the back gardens of some homes in neighbouring Highdown Drive. At a meeting of Arun District Council's development control committee on Tuesday (May 18), members discussed concerns raised about the position of the fence, its height and the decision to build it in weathered steel rather than wood.'***

<https://www.littlehamptongazette.co.uk/news/politics/independent-expert-to-look-at-controversial-littlehampton-fence-3242295>



Rusty Fence clearly more in tune with urban motorway situations than rural villages.

## **8 DRAINAGE & IMPACT ON LANDSCAPING**

a) Capita issued its drainage proposals on 30th July, 2020 and landscape drawings were updated in August and again later. I believe that the mitigating landscaping provision was substantially reduced following Capita's release of its drainage scheme, although the landscape drawing revision notes do not explicitly say. This would give reason behind the many false application claims of providing landscaping mitigation expressed in application text, the planting reduction inconsistencies between text, planting plans, plant schedules, and even the failure to meet the GIS Policy aims and objectives ... and why the habitat drawings and Bio Diversity Net Gains calculations are wrong.

**The resubmitted landscaping still fails to meet the intended landscape protection and improvement required to meet planning policies at all levels and this reduced minimal landscape scheme needs to be challenged by WSCC planners as totally inadequate. Larger sized trees need to be strategically included throughout the road length and substantial planting needs to be undertaken on and around Fontwell Avenue and Barnham Lane Roundabouts to mitigate against the massive intrusive impacts these roundabouts will have on these village roads.**

b) The new road on its raised causeway effectively cuts off the existing natural North-South surface land drainage pattern. The Northern Balancing Pond, located on northern side of the road raised causeway has no overflow water discharge provision, other than just flooding over the adjacent grazing meadows, which already will be seasonally at field capacity; thus making these meadows water-logged and unsuitable for animal grazing. The drainage scheme text recognises that the water table will be seasonally nearly at ground level, and no doubt the high water table flood risk will be increased by the 'cut off' effect of the continuous presence of the raised compacted causeway, without adding over-flow from ponds. **I note than that in the new submission on drainage, the cut off effect of the road over Barratt's site is thought to beneficially reduce water runoff towards the Barnham Lane ditch? However, won't there be a similar cut off situation from the wider northern land area funnelling run off towards the Black Lane ditch and east boundary properties?**

The balancing ponds are shallow at 1.0m depth and lined, which is atypical for normal balancing pond design, especially being so shallow. 1.0m water depth is insufficiently depth to ensure that the ponds do not become overwhelmed with peripheral water plants, such as reed mace, reducing the balancing pond capacities. Regular pond plant removal will be needed to maintain the pond's drainage water retention capacity but, of course, such maintenance will conflict developing amenity values and encouraging wildlife.

There is likelihood that the N and NE ponds seasonally will provide little or no balancing capacity so will flood over adjacent meadowland and the Barnham Lane Ditch, which sits within a High Flood High Risk Zone level 3. This ditch runs northwards past Chantry Mead, Ewens Gardens and very close by 31A & 31B Downview Road (DR) properties.

c) From reading the background FRA correspondence, in the **first** application appendices, I discern there is disquiet about how the drainage system will be perform.

In the Flood Risk Assessment Appendix 11.1, Pt 4, App B.2 there is correspondence from Arun to a redacted recipient, dated 30.04.20.

Arun's drainage engineer states that the defectively installed Chantry Meads SuDs system on-going problems are almost resolved but confirms that groundwater at MG/CM is known to peak at 150-300mms below ground level.

**I suggest when the compacted raised causeway bottom of bank land drains and Barnham Lane Ditch are full, the risk of DR/EG/CM/MG flooding will be worryingly raised, even if the Chantry Mead estate SuDs scheme problems are resolved since it also feeds into Barnham Lane Ditch.**

d) Pt 6 FLA includes a land survey with levels and contours, but this is unreadable as presented since it is cut into two pages which don't seem to fit together, uses pale colours and tiny text against a white background. Also, there is no title block, no north point or no landmark positioning information to allow the survey to be orientated and understood within the application site boundaries.

**Planning application documentation must be clear and easily read, so not to hamper public understanding. The resubmission land survey remains difficult to read.**



## **8 DRAINAGE & IMPACT ON LANDSCAPING continued**

e) Pt 10 FLA includes a 03.07.20 email from WSP to Arun & WSCC, so before the Capita drainage scheme plans were finalised. In it WSP asks Arun and WSCC to confirm that **they are happy to reduce the Barnham flood standards for the Scheme**, which seems to indicate that the required Barnham SuDs Standard could not be met.

**I believe that there remains uncertain drainage risks associated with the road scheme that will heighten flood risks to N and E, land and properties, particularly to grazing paddocks, the very close-by properties of 31A and 31B Downview Road and others in Ewens Gardens, Chantry Mead and Merrell Gardens all within the High Flood risk zone.**

**Surely, It would be profoundly unacceptable for the SuDs standards for Barnham to be reduced by our local authorities to facilitate the approval of a drainage defective scheme for one of WSCC's own planning applications? I hope that the WSCC planners will remain objective, duly diligent and not be swayed.**

## **9.0 CONSULTATION**

a) WSCC has been aware from earlier stage public consultation that many within the Eastergate and Barnham communities were unhappy about adverse impacts arising from the proposed BEW Phase 1 Proposals, realigned road and inter-related housing, which will affect many local lives, their enjoyment of their properties and their local environment. **This New Road will deliver the biggest ever environmental change to our village environment and communities and winning the trust of our communities has been treated as irrelevant. Don't local lives matter?**

Application Environmental Statement.

Para 1.1. 5 - confirms the schemes adherence to Town & Country Planning EIA Regs 2017.

This TCP document includes: *'The aim of Environmental Impact Assessment is also to ensure that the public are given early and effective opportunities to participate in the decision making procedures.'*

The application text mentions an 'online consultation' addressing noise impacts applying to Eastergate and Barnham communities dwellings. I was present and can confirm that there was no consultation, all 'green options' presented were unimaginative and ruled out without evidence provided or discussion, leaving the community feeling steam rolled and not consulted. Options of a rusty barrier, a painted metal barrier and a plastic barrier were the only solutions the Highways/WSP team engineers were prepared to discuss.

b) DBRM LA 111Rev 2 states:

*3.65 The suitability of each potential mitigation measure for use within the project area shall be determined based on the following criteria: .....*

*5) the impact of the measure across other environmental factors, for example the visual impact of a noise barrier.*

To be effective I know that noise barriers need to be close to the noise source and higher than the line of sight of the receptor. Also, I can see that for the current road layout, that limited space is the reason for selection of the 'rusty wall' Noise barrier, but this current road design will massively and badly impact the amenities and other aspects of DR/EG/MC/MG properties and their owners. Additionally, this 3.0m ht 440m long Rusty Barrier will become the Landmark Blot on our local Eastergate landscape.

**9.0 CONSULTATION continued**

c) No longer will Eastergate be characterised by its historic village centre with Lion war memorial roundabout. It will become, **that village with the massive rusty wall ... possibly that massive graffiti defaced rusty wall.**



**Imposing this** acoustic barrier solution against community wishes and against developing a more village friendly solution is totally unfair on Eastergate and Barnham villages, local setting and the people who live there and value the character and rural setting of their village.

**Maintenance:**

**How frequently will the graffiti be removed?**

It is clear to me that the adverse impact on Eastergate's landscape character, together with all other identified seriously harmful impacts arising from this road scheme, all serve against this new road being pushed through a too narrow a gap on to Barnham Road. WSCC and Arun need to go back to the drawing board and come up with a much less harmful, landscape friendly, road scheme solution, moving it westwards over the Halo site and designing it to be more in keeping with Arun's own GIS policy objectives.