

# Barnham and Eastergate Neighbourhood Plan 2014-29



Consultation Statement  
Plan period 2014-2029

Published December 2013



## **1. Introduction**

- 1.1 This consultation statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Barnham and Eastergate Neighbourhood Plan (BENP).
- 1.2 The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
  - a. Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - b. Explain how they were consulted;
  - c. Summarise the main issues and concerns raised by the persons consulted; and
  - d. Describe how those issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan

## **2. BENP - An outline of how the process of NP was conceived, its chronology of the process undertaken**

- 2.1 The Localism Act in 2011 offers communities the opportunity to have a say in how their area developed. A number of Barnham Parish Councillors attended various briefings and courses to prepare to take advantages of any new powers.

It was agreed that at very early stage that Barnham Parish Council could only develop a Neighbourhood Plan (NP) if it was in association with Eastergate Parish Council. Although Eastergate and Barnham are two separate villages, most of Barnham Village is in Eastergate Parish. This is a perpetual source of confusion to most visitors and many residents. Therefore it seemed illogical to produce two separate plans as both parishes are interdependent. The local bye-elections on 16 February 2012 elected parish councillors to Eastergate Parish who were determined to work jointly with Barnham Parish Council. In March both parish councils formally voted to produce a joint Neighbourhood Plan. A joint working group (JWG) from both parishes was set up, consisting of two Barnham Councillors, two Eastergate Councillors and the Barnham Parish Clerk.

**Barnham PC agrees to be the sole qualifying body for the whole of the neighbourhood area and Eastergate PC consents to that body putting forward a Plan for its area**

The first step was to produce a questionnaire that would be sent to every household in both parishes. This was to engage the community and ensure their views would form the basis of the Neighbourhood Plan, rather than the thoughts of the JWG. The JWG agreed the questions and invited any members of the community to volunteer to help produce the plan. Arun District Council (ADC) supported this project and helped in the wording of the questions and produced an analysis of the results. The questionnaires were delivered by volunteers to every household in both parishes in May 2012 with a closing date for responses in June 2012. Meetings of the JWG prepared for an initial meeting of volunteers and took advice from ADC on the best way forward.

The forty people who volunteered to help were contacted and invited to the first meeting on 21 July 2012 and eleven attended along with the five members of JWG. The meeting agreed that there should be six working groups: Housing; Transport; Employment; Social Infrastructure; Drainage; Environment/heritage; each reporting back to a Steering Group.

Minutes were sent to all those who had volunteered to help, with an invitation to join one of the six working groups. The first meetings were arranged for mid September and a parish councillor was tasked to be in each group to make the initial arrangements to get each group established.

During the summer months the JWG completed the legal arrangements to set up Barnham and Eastergate Parishes joint Neighbourhood Plan (BENP). In July ADC agreed the NP could cover both parishes and in August the formal application to set up a joint NP was accepted.

ADC grouped parishes in clusters to enable the groups of parishes to work together to help develop NPs. Aldingbourne, Barnham, Eastergate and Walberton Parishes made up our Cluster. Funding of £20000 'Front Runner' grant was made available to the Cluster to develop the NP. Formal minuted meetings were arranged and an early decision was made to engage the professional services of Navigus Planning to provide independent advice, and Process Matters was later engaged to act as a consultant regarding communications and the drafting for the BENP steering group.

Once the working groups were established their main focus was on gathering evidence which would help in the formulating of policies. Meetings and activities from some of the working groups continued throughout 2012 and on January 14th 2013 the leaders of the working groups met with Process Matters to review progress to date. Process Matters agreed to audit work to date to ensure statutory compliance, and to provide a full report detailing work still required to be undertaken by the working groups.

A further meeting took place with Process Matters on 19th March 2013 to review progress since January 14th 2013, and to plan for the public exhibition being mounted to coincide with the opening of the new Community Hall in Barnham in May 2013.

By April 2013 it was becoming apparent that the volunteers comprising the individual working groups were struggling to meet BENP deadlines and the Steering Group decided to invest further in the services of Process Matters, especially with drafting and ensuring consistency of policies with district and national frameworks. It was also decided at that time that the work of the Social Infrastructure Group could be taken on by the Environment and Heritage Group, thereby merging the two.

By the summer of 2013 it was clear that the process, which by this time had been progressing for a year, had slowed and was losing momentum. The realisation that a more sustained effort would be needed to get back to the schedule led to a decision by the Steering Group, and the individual group leaders to meet almost every week throughout the second half of 2013. Any outstanding policies were drafted, and others were modified in the light of evidence from the working groups, the feedback from consultation events in both villages and evidence from the survey in October.

NB

During the process of producing BENP the steering group started life as a joint parish working group and has been referred to throughout by a variety of names including two villages group, neighbourhood planning group among others. For consistency since May 2013 all references have been to BENP.

### **3. Task Group Methodology and findings**

#### **3.1 Employment**

The original group when it was formed resulted in a small but very motivated team. The employment vision constituted our objectives, they were:

- *To establish a vibrant, dynamic, resourceful, enterprising and ambitious Economic Base looking both inward and outward for opportunities and trade.*
- *To establish an enterprising business community that works together in mutual support, with pride, respect and commitment to the local area.*
- *To establish an enterprising business community that believes in ethical values and high standards and which is committed to quality, excellent service and exemplary customer care.*
- *To create a Local Neighbourhood that is not only a desirable place to live but also offers a business environment that supports the birth and incubation of new enterprise and nurtures the growth and expansion of commerce.*

The Vision Statement, we believe, contains the factors that are important for business sustainability, underpinned by ethical and commercial standards.

Our original remit for the group was unclear; we really had nothing to work on, or any true guidance. We therefore chose to be aspirational in our thinking and concepts and just go for it!

Having a combined period of over 30 years experience of working in business and industry within the group we took a systematic approach to our planning;

Where are we now? - Representing the current situation,

Where do we want to be? – Being the end goal policies that would assist in facilitating the achievement of our Vision; and

How are we going to get there? – The information gathering and analysis that would be required on the journey.

This was too simplistic; we had set ourselves a challenge and to describe this was going to take reams of paper so a modified cause and effect “fishbone” diagram was drawn which visually and concisely sets out the tasks, stakeholders, factors etc all broken down (into manageable parcels) and made understandable. See *NP Employment\_task diagram.pdf*

From this a task table was created and work was divided up between the team members.

See *B&E\_NPemployment task table.doc*

Project work was a combination of desk top research and practical studies. The desk top studies involved the collection and analysis of relevant data from various sources including government, academia or commercial sources. The practical studies involved street surveys and the design of various question sets to be asked during consulting interviews with local enterprise stakeholders.

For the desk top work we relied on literature studies of data, all of which were in the public domain. The level of consultation was low but the relevance was high and breadth of experiences wide.

For the practical elements, this was a case of pounding the pavements and actually engaging the business proprietors and operators in interviews.

As greater clarification to the purposes of the NP became apparent the relevance of our work also became clearer and the dominant aspects were identified, that is, land use in particular. We therefore shifted our focus into alignment with this and orientated our analysis to capturing the significant land use elements that impacted on employment i.e. horticulture, retailing, car parking and other factors that supported or enabled enterprise.

#### **Employment Group research outputs - full copies on the web site :**

- The Vision
- Employment Task Diagram
- Analysis of the current recession and its impact on employment
- Employment trends
- Local economic activity 2011
- An analysis of the neighbourhood demographics
- Neighbourhood Skill Set Data
- A review of neighbourhood Wealth and Incomes
- Dangers of Spatially Targeted Enterprise Policy
- Tried and Tested Govt Employment Solutions
- Tried and Tested Govt Employment Solutions Re-engineered
- Small Business the way forward for B&E NP
- B&E NP\_employment\_and enterprise.doc
- B&E\_NP\_employment\_report.doc

### **3.2 Housing**

The inaugural meeting of the Housing Group, (HG), took place on 18th October 2012. The group was drawn from volunteers following the earlier consultation and request for volunteers by the BENP Working Group, ( subsequently referred to as "the Steering Group"), together with 2 parish councillors.

At this meeting the HG agreed its Terms of Reference, agreed that the parish councillors would share the lead, and would report back to the Steering Group as appropriate. Additional members would be sought as the need arose, and advice

would be taken from professionals engaged by the Steering Group to assist in the drafting of the BENP.

Analysis of the initial questionnaire sent to all residents in the 2 Parishes in May 2012 showed a number of key issues of importance to local stakeholders, ie all those living and working in the 2 parishes. At the inaugural meeting the HG, informed by the results of the questionnaire, agreed the main topics, as modified in the light of the results of the questionnaire, which would form the housing section of the BENP.

A number of action points were identified and a further meeting would be arranged when the actions had been completed.

It was also agreed that the key principles in Arun's Draft Local Plan and in the NPPF would guide decision making and act as a framework. Information to inform the HG contribution was drawn from a number of sources, and in particular the Community Profiles produced by Arun DC, national census data, the SHLAA attached to the Draft Local Plan and parish council population forecasts, which in turn had been produced by WSCC.

A complete review of all possible housing sites was undertaken using the SHLAA as a base line.

The HG met again in January and April 2013, and more frequently from June 2013 to date. There was informed discussion on the results of the information gathering, and regular meetings during the 2nd half of 2013 with the other working groups to ensure consistency with all the emerging policies. In addition the HG was informed by the results of various open days and exhibitions, further questionnaires, public meetings, and any feedback from the Parish Councils. In addition to these consultations, regular newsletters were produced and delivered to every household in the 2 parishes, and all landowners whose land had been identified for inclusion in the HG contribution to the BENP were contacted and their views canvassed. As a result of this contact there were meetings and telephone conferences with interested parties.

#### **Housing Group research outputs - full copies on the web site :**

Site Appraisal Report

### **3.3 Environment and Heritage Working Group**

#### **Membership and Meetings**

Seven volunteers contributed to the Working Group, including a BPC councillor, with a variety of professional expertise and relevant interests and enthusiasms, all local residents of either Barnham or Eastergate parish.

The working group met 15 times between October 2012 and July 2013.

The group was represented by two members on the NP Steering Group from the start. After July a core of four members worked with the Steering Group to help finalise the final versions of the Plan, and presented displays of the work of the

group at the public consultation events. They also met on two occasions to re-visit the E&H policies and summarise them for inclusion in the final plan.

Notes of all the working group meetings with agreed individual actions were produced and included in the web site.

## **Aims and Objectives**

At the first meeting it was agreed that the main task was to analyse the detailed nature of the parishes and consider protection and conservation, appropriate development and risks.

The group drew up an “overarching vision and aims statement.” The scope of the working group would include landscape, nature, biodiversity, energy, impact of climate, flooding and drainage, history and village character.

A bank of evidence was sought from a variety of official sources on the local environment and heritage and compiled to form a significant research base for the group’s proposals.

Relevant sections of drafts of the ADC Local Plan and the Thame NP were used to inform the structure, objectives and policies of the E&H contribution toward the final plan. Agreed sections of this chapter of the BENP, with sub-divisions reflecting all the group’s detailed objectives, had the following headings:

1. Quality of the Environment
2. Water
3. Natural Environment
4. Conservation and Archaeological Heritage
5. Green Infrastructure
6. Climate Change and Renewable Energy

## **Evidence**

Research tasks were divided up between group members, who would then communicate by email and report back to subsequent meetings. Initially broad information was sought from other NP templates and wide –ranging Environmental, Play and Heritage policies from WSCC and ADC.

On the Heritage aspect, local historical sources were consulted, including the County Record Office, English Heritage (for listed buildings), the Weald and Downland museum, the local church archives, other local museums, as well as local historians and their published output, especially Sandra Lowton, who shared information and bibliographical sources with the group before her book on the history of Barnham since the railway was published.

Environmental sources included the Environment Agency, Natural England and the Woodland Trust. The group was particularly grateful for the detailed account of natural biodiversity in the parishes from the Sussex Biodiversity Record Centre based at the Sussex Wildlife Trust centre at Henfield. This was supplemented by another lengthy and detailed report from the Sussex Ornithological Society record of sightings. Members of the group summarised these reports as appendices to

the NP. Some of the references included were followed up for more detail and the WSCC Principal Ecologist was also contacted for advice.

Further information on play areas, allotment requests, protected trees and maps were obtained from the district and parish councils.

Members of the group participated in a number of walkabouts and photographic records were taken of relevant buildings, historical features and aspects of the landscape, including local green spaces. Schoolchildren from Eastergate Primary School participated in this, photographing buildings and sites of interest and writing about them.

## **Consultation**

The E&H working group participated actively in the four public events that provided an opportunity for public discussion and comment on the NP (the Barnham Community Hall opening, the Villages Action Group festival and the two parish NP exhibition events), with display stands, questionnaires and information.

The children of Eastergate C of E Primary and Barnham Primary schools completed questionnaires upon all the play areas in the parishes. The results were tabulated and a summary was sent to each Parish Council providing them with some interesting and useful feedback. The Eastergate schoolchildren also surveyed their local area as part of their History and Democracy learning, they analysed the quality of play provision. Samples of their work were displayed as part of two public events for the NP in both Barnham and Eastergate.

## **Process**

Once the evidence had been gathered and considered, members of the group were allocated sections and sub-section of the plan to write, allowing 5 weeks for each section. ADC numbered policies were referred to throughout. These drafts were submitted to the group by email and discussed at subsequent meetings where amendments and proposed policies were finalised. The finished sections were sent for inclusion on the web site.

This process was shaped throughout by guidance from the Steering Group and the NP consultant.

During the later stages of the process, members of the working party joined the Steering Group, and also met again to summarise the policies arising from it's chapter for inclusion in the final report. Extracts and policies from the Environment and Heritage sections were incorporated into the final version of the NP. All of the sub-sections and research documents produced by the group are included either in the appendices or the evidence base.

## **Environment and Heritage Group research outputs - full copies on the web site :**

Natural Environment  
Fontwell Racecourse SNCR Ar 1  
Synopsis of Desktop Biodiversity Report



Bird sightings in Barnham and Eastergate  
Biodiversity Opportunity Area 64 - Lidsey Rife  
Waterbody Summary Sheet  
Tree Preservation Orders in Barnham  
Tree Preservation Orders in Eastergate  
List of British Native Trees  
Conservation and Archaeological Heritage  
Green Infrastructure  
No. 6 Climate Change  
Allotment Survey  
Listed Buildings in Barnham - map  
Listed Buildings in Eastergate - map  
Tree Preservation Orders in Barnham - maps  
Tree Preservation Orders in Eastergate - maps  
  
Code for Sustainable Homes  
Building for Life 12

### **3.4 Transport**

The process began with the initial, widely publicised, public meeting held on 21<sup>st</sup> July 2012 by Barnham & Eastergate Parish Councils to discuss the development and preparation of a Neighbourhood Plan. It was agreed that the process would initially be broken down into specialist topic working groups serviced and managed by a steering group. Members of the parishes attending the meeting were invited to join one or two working groups. They were also asked to informally publicise the process further and to encourage others from the community to join these groups.

Some eight to ten people expressed an interest in gathering and collating the information relating to Transport (subsequently renamed Getting Around). The initial meetings held in late September early October 2013 drew up a Vision Statement and draft Terms of Reference (copies available) which were ratified by the Parish Councils. Members of the working group were assigned tasks and meetings were held regularly throughout the autumn of 2012 and into early 2013.

The process of information gathering included

- talking with local residents
- talking with businesses
- talking with transport providers both public & private
- parish questionnaire survey
- using the web and individuals/residents with local knowledge
  - o identifying and researching data relating to transport flows both within and through the parishes as well as the surrounding area
  - o identifying and researching information relating to parking
  - o identifying and researching information relating to cycle routes / paths, footways and footpaths.

During the early part of 2013, representatives from each the various topic groups began meeting with the steering group with a view to

- collating the information which had been gathered
- identifying where the evidence base was weak and how to address this
- identifying extraneous information and/or proposals where the parishes lacked the authority to influence future developments
- identifying where policies were not clear or were contradictory

A very rough draft of the Transport section of the Plan was prepared in early May 2013. This was subsequently amended and refined in the light of the feedback from the community (questionnaire), further evidence gathering, and ongoing developments in the affairs of the parishes.

At this stage (mid 2013) the Neighbourhood Plan was starting to come together as a complete document spearheaded by the work of Maureen Chaffe. The process of revising, refining and buttressing the information carried on at regular (often weekly) meetings throughout the summer and autumn of 2013.

**Transport Group research output - full copies on the web site :**

Car Parking Survey undertaken March 2013  
Transport Infrastructure Report

### **3.5 Drainage**

The procedure for the drainage group was slightly different because of the long standing history of flooding and drainage problems. Barnham Village Drainage Group was established after the flooding in 1993 when inshore lifeboats were deployed to rescue some Barnham residents. The group was made up of councillors from both parishes, and very well qualified residents, whose remit was to gather evidence of drainage and flooding problems. This factual information was used to help persuade the relevant authorities to take action to improve the situation. A second culvert has been cut beneath the railway embankment to ease the flow of the Barnham Rife and the main sewer under Barnham Road has been replaced since 1993. However the group is of the opinion that more work needs to be undertaken to address the current and on-going problems, and it seemed appropriate therefore that the Barnham Drainage Group, (still containing parish councillors from both parishes), should form the BENP drainage group. All information relating to the activities of this long established group are set out on our website and the steering group, after consultation with the Barnham Drainage Group agreed to adopt their policies.

**Drainage group research outputs - full copies on the web site :**

Neighbourhood Plan Drainage Overview  
Aldingbourne Flood Risk Draft  
Barnham Flooding and Pollution Southern Water Position Statement

Barnham and Walberton Flood Map  
Draft List of Flooding Incident Locations June 2013  
EA - Sustainable Drainage Systems  
EA Effluent Disposal in Sewered Areas  
EA Position Statement Foul Drainage Problems in Barnham area  
Hydrogeological Report Geological Vertical Sections  
Hydrogeological Report Page 1  
Hydrogeological Report Pages 2 to 9  
Hydrogeological Report Geology Map  
Lidsey Catchment Map  
Southern Water Services Response to Planning Application  
Surface Water Management Plans

#### **4. Public Consultations**

- 4.1 Questionnaires were delivered by volunteers to every household in both parishes in May 2012 with a closing date for responses in June 2012. 392 responses were received. Meetings of the JWG prepared for an initial meeting of volunteers and took advice from ADC on the best way forward.

The forty people who volunteered to help were contacted and invited to the first meeting on 21 July 2012 and eleven attended along with the five members of JWG.

Each month a parish newsletter delivered to every home reported progress to residents and continued to seek volunteers.

The Neighbourhood Plan Steering Group held two Public Meetings in October 2013 to present the findings of the Focus Groups and invite further comment on draft policies. Around 100 people attended and provided comments and suggestions which were used to refine the plan and work up the proposed policies and justifications into a draft plan in anticipation of a full six week consultation with residents. These draft policies were approved by the Parish Councils in October 2013. A decision was made to lead the six week consultation with a Survey of all residents identifying the key issues and policies and using a combination of tick boxes, rating lists and free comment boxes. Over 2000 surveys were posted to all households and businesses and it was also put on the Parish website for online completion. 616 were returned being a 28% response.

The demographics of the survey were broadly in line with those of the Parish with the exception of the younger age group. To address this the local secondary school was engaged to complete the survey which resulted in a further 43 responses. This also provided an opportunity for the comments from young people to be focussed on.

The results of the public consultation clearly reinforced the policies and no changes to these were therefore needed. (Results can be viewed on the web site). However, the policies were then checked by Navigus Planning and by ADC and amendments

made to the wording to make them stronger and some policies were removed as they were not planning issues. Those items will be dealt with through the normal business of the Parish Councils.

## **5. Key issues identified during the 2012 survey process**

- 5.1 Almost universal disagreement with the suggestion that more than 200 new houses should be built within the two parishes.
- 5.2 Almost universal agreement that the existing village boundaries and gaps between the villages should be maintained as well as greenfield sites and open spaces be protected.
- 5.3 Nearly three out of five consider the local area needs more employment. Only just over one in three respondents consider the local area to have sufficient facilities for employment.
- 5.4 Three quarters of Barnham based respondents have concerns about parking in their area. This compares with three in five of those living in Eastergate.
- 5.5 Five out of six have concerns about the number of HGVs using the roads in the villages. Those living in Barnham are slightly more likely to feel this. Four out of five have concerns about the speed of traffic locally. Again, those living in Barnham are more likely to feel this. 212 responses were received regarding traffic volume; many comments supported the view that local roads are very busy.
- 5.6 More than two in three say that they would like to see more local cycle lanes and routes.
- 5.7 Those living in Barnham (58%) are almost twice as likely to say they have been affected by flooding as those living in Eastergate (31%).
- 5.8 Again, those living in Barnham are twice as likely to say they have been affected by problems regarding sewerage (41% cp. 20%).
- 5.9 Facilities for teenagers; local footpaths, access to the countryside; healthcare; local bus services; and allotments are mentioned by between 57% and 62% as facilities that respondents would like to see extended or improved. Facilities for the retired are mentioned by just under a half, and education: schools; adult education; and child care/nurseries are mentioned by between one in five and one in four.
- 5.10 Three in five say that they would like the current parish boundaries to change to reflect the boundaries of the present settlements.
- 5.11 Respondents were asked if they had any other matters that they wished to raise that could assist in the development of the Neighbourhood Plan. 167 comments were received covering a wide range of topics.
- 5.12 235 respondents expressed interest in participating in the next stage of the consultation.

## **6. Key Issues Identified during the October 2013 Public Consultation Days**

- 6.12 Over 90% of all respondents to the survey wished to see the character of buildings and features preserved; the gap between the settlements preserved; protection of the flood plain south of the villages and new development restricted until the Surface Water Management Plan for the area is completed.
- 6.13 There was widespread support for improvements to play facilities; protection of school places for local children; provision of allotments.
- 6.14 There was support for small scale development to meet local housing needs.
- 6.15 There was support for sustainable growth in employment and for the promotion of tourism opportunities.
- 6.16 There was support for new 3 bed houses, 2 bed bungalows and 2 bed flats with affordable housing being most popular.
- 6.17 Widespread support and a deep understanding of the need for protection of our open spaces and wildlife corridors.

### **Likes about living in the parishes**

Village life  
Semi-rural parish  
Quiet  
Friendly  
Community  
Convenience

### **Dislikes about living in the parishes**

Over development  
Traffic volume  
Traffic speed  
Flooding  
Parking  
Litter

## **7. Information taken from post it notes completed by residents at the open days October 2013.**

### **Community and Wellbeing**

Look into the past to see all the mistakes we have made and are ignoring.

Seek allotment site as S106 part of new developer led housing schemes.

Allotments - consider share option schemes with owners of gardens that are too big for their needs.



I feel that allotment area should be combined with a natural environment for wildlife (flora and fauna ) that can be managed by local volunteers thus negating that which we are losing.

No provision made for additional places of worship

No provision made for any places of worship

We urgently need to provide land/space/zoning for churches and places of worship. With so many persons coming to the new homes there desperately needs to be provision for persons of whatever denomination.

I understand that Barnham school is already almost at full capacity. Where will the children of the new houses go? Presumably commute to other places adding to the traffic problems.

Need more school places if Barnham is to expand. It would be a mistake for Barnham school to become a 3-4 form entry.

A health centre in Barnham is a must - the original one should never have been shut.

The Croft Health Centre is too small as it is. Terrible parking and difficulty arranging appointments.

Avisford Medical Centre needs much more access for parking, ideal would be to get out medical centre back in Barnham.

Health Centre urgently needed in Barnham

Essential to have a GP surgery/health centre in Barnham

The proposed additional housing has significant implications for school places, medical care, parking, traffic congestion and general amenities which do not seem to be provided for by developers. This will seriously affect quality of life for existing and prospective residents.

As long as we get extra doctors too! Not just bigger waiting rooms.

There is little provision for teenagers in this area at the moment.

Develop leisure activities which combine all age groups.

For all ages, especially the young and old, medical care should be accessible and the doctors should not be under pressure of too many in the population. For health and welfare of all community access to sports and leisure facilities and access to open public space for sport, walking and cycling is vital to the community and the village.

Youth leader needed for both villages.

## **Getting Around**

We need a bus route in Lake Lane. Many folk are unable to walk to existing bus stops or railway station.

Better publicity over existence and routes of village minibuss door to door service.

Local bus service from Slindon, Fontwell to Barnham

Improved bus service between the 5 villages, to link doctors, shops, schools, railway station. This might reduce the need to provide retail parking in Barnham.

Better bus services

Proposed development at Pollards Nursery would put commercial lorry access with residential with high potential for accidents.

If more commuter parking goes ahead why cant the parishes have a % of the takings?

More off road parking in the centre of the village would improve traffic flow at busy times and reduce the congestion near the shops/station.

Additional commuter parking must be affordable otherwise people will continue to park in roads.

Enforce restriction to disabled drive parking and extend this by kiosks .....cant read

Have more restricted parking in Barnham for residents use.

If Barnham Road is widened - all houses along that road will lose part of their front gardens - compulsory purchase!!

No A29 bypass - sort the Woodgate crossing - spend money there

Resist attempts by ADC to divert the A29 traffic through our neighbourhood Plan area.

Barnham is already too congested. There are no proposals on how this will be tackled when development proposals are made.

Combination of already high amount of commercial traffic from nursery and proposed new development will increase risk of traffic accidents.

Fontwell Roundabout, Nyton Rd junction, Chichester Roundabout, Woodgate Crossing and Barnham/Fontwell Rd junction all need to be addressed before anymore large scale development because of congestion problems at these junctions already.

Farnhurst Estate warrants a 20mph limit throughout.

In their advertisement for the new houses on Brooks Nursery site, David Wilson/ Barretts refer to Barnham as a rural and tranquil village. It may have been before all the housing estates were built. These together with all other applications either passed or in the pipeline will result in traffic chaos and it is a joke to refer it Barnham as rural and tranquil.

Proposed housing development would result in higher traffic increasing risk of accidents.

Must sort out commuter parking.

Restrict commuter parking in residential roads.

Please don't forget parking for residents in the village centre.

If adequate provision is not made for parking that reduces the pressure of long/short term commuter parking in residential areas I fear that there will soon be conflict and disputes between commuters and householders.

Protect the residents of Barnham against serious long term parking by train users.

The centre of Barnham needs to be re-arranged - it is dangerous re traffic and pedestrians.

Enforce low speed limit

Provide for more parking. Why has the parking space behind the Co-Op become chargeable? It is hardly used at all. Short term parking should be enforced but not paid for.

More bike racks at shops and station.

Yes to footpaths. No to cycle paths. Cyclists should contribute to road tax.

Walking/running between villages is not safe in the hours of darkness, hence compel additional car trips. Need dedicated foot/cycle paths.

The area needs far more cycle routes so more people will leave the car at home.

Improved cycle routes , paths and awareness signs for motorists.

Anything that helps cyclists and walkers and calms traffic.

Maintain footpaths - Yes; Extend cycleways - NO

Improving road safety is vital for school children, both primary and secondary and increasing number of 6th formers to the schools in the area. Cycle paths and footpaths are vital for this and for recreation.

Possible future cycle link to Tangmere is a very good idea for a quiet route to Chichester.

## **Environment and Sustainability**

The gaps between the villages must be preserved. We are separate distinct villages not a town known as the five villages.

Who will want to buy a home in a village where it regularly floods?

It is essential that no further building happens before the drainage/flooding issues are resolved for the long term future.

The existing flooding is already a problem which will be exacerbated with more development reducing the permeable ground areas causing more surface water flooding.

Flooding is already a serious issue in Barnham and extra housing, particularly on the flood plain would prove disastrous.

Running sands and poor drainage a priority.

We need a groundwater action plan too.

Clymping is being left to allow flooding by the sea to flood this area from the rear, thus making any development not safe.

This area has deteriorated in quality drastically in a few short years. Soon it will be too late.

Flooding is already a common issue in the area, before new housing is added this must be fixed.

If developers want to build new houses they have to provide sufficient flood prevention or developers should be forced to pay the compensation for flooding.

No further housing until WSCC and the EQ have completed studies on SFRA and Rifes. New sewer systems for developments no packet sewage systems/SUDS.

There will be flooding, no question. You must formulate a plan for when this happens as those affected will want to blame changes caused by development. The developers will of course deny everything. Legal minefield.

Nature is mightier than planners. There will always be flooding in this area which cannot be fully controlled.

We do not need a planning department at ADC we have developer led planning.

Saxby Close 'green spaces' will remain so but they are private and not open to general public access.

We need to value and respect existing residents and make sure that their homes are not under risk of flooding with surface water, ground water table rising or semi treated sewage due to further development.

## **Housing**

Suggest that ADC require higher eco/renewable standards on all housing, as opposed to bare minimum standards.

No, no no to 2500 houses in the fields between Barnham and Eastergate.

All S106 money should be used for required infrastructure not the A29.

Plots with approved planning permission must be developed before new permissions granted.

Should not build any more houses as Barnham is too small a village.

The main concern for me is flooding of gardens in Collins Close/Cherry Tree area. If housing plan 1,2 or 3 can be built with the new doctors surgery a part of that plan and leave the field adjacent to Collins Close/Cherry Tree empty for drainage that would be better.

There needs to be more exits out of this proposed development. For (phase 1) there is 2 exits into Barnham Rd. For phase 2 there is still only 2 exits which will cause a bottleneck. As a recommendation why not make another exit off the loop at the furthest point from the exit to Barnham Rd.

Careful interpreting answers to number 2. If I want 0 I disagree, if I want 700 I disagree.

Local housing must have accompanying facilities e.g. doctor, schools, village halls, transport - buses and cycle paths.

This is a rural area not a housing estate or suburb of Bognor Regis/Littlehampton. Please don't spoil it.

1,500,000 empty homes in this country. Why keep building on green land. We need our farms.

Very concerned about the proposal to put housing to the east from Garden Crescent towards Yapton . Have no problem with a few houses adjacent to Garden Crescent.

The maximum number of 350 houses over next 20 years should include all development that has been given permission but not built. This totals 399!

It is difficult to envisage how high design standards and quality of environment could be achieved in view of the numbers of houses proposed for such restricted areas. To cram so many houses into such a limited space would inevitably have a detrimental impact on existing and new residential areas.

The ADC plan proposed to build 2500 houses in the good agricultural fields (which might be needed again one day in our dodgy future to grow food again) between Barnham and Eastergate is disgraceful. It negates all the moves by this prime minister re not closing green gaps between villages, will undoubtedly change the character of this area as more traffic is created and the population increases. There is not enough road space for more traffic and population and building more roads would virtually ruin the area as it is now.



We should consider non-traditional design e.g. timber buildings with high energy efficiency. ( Perhaps reference SCANSKA/IKEA designs from Sweden). Low carbon building materials e.g. wood, aluminium, re-usable clay tiles, as opposed to brick.

Proposal 1 is the better option (still not great). Proposal 2 is too close to Collins Close. The spare piece of land would become a dumping ground. Wildlife (deer, foxes, pheasants) would be forced from the area.

Very worried about the housing near Collins Close. Already a flood area and as Collins Close resident we currently suffer from a flooded garden after heavy rainfall. More housing will increase this problem.

From a resident of Collins Close - If there is to be any building in the area the only option of the three on view would be proposal number 1. However, any building has to take account of - 1. Flooding - we regularly have a flooded garden even now. Any building will make this worse. 2. Wildlife - we regularly see deer and foxes. These would disappear.

Any development has to be low numbers as there is already a lack of infrastructure - roads too busy and in poor condition - pavements dangerous and too narrow - flooding on major roads - overcrowded medical centre etc, etc, etc

## **Employment**

Tesco at The Barnham Hotel is a concern

Doctors and Dentist required for village centre

Fast broadband for all

Buy local to keep money local and support local enterprise

People that run businesses from home also need swift and reliable internet access not just the big commercial users. Please ensure there is parity.

These are all laudable objectives but have you the manpower and infrastructure to ensure that they can be carried forward and objectives reached and sustained?

Development over existing business premises would diminish local employment by increasing the local population and decreasing the local business premises opportunities. The only way to stop local businesses going elsewhere is to support them - shop local! Use local services wherever possible. We need to build a community of local business owners to try and support each other.

Monies made by various internet interests is not being channelled back to local communities.

Improve online access for all, not just commercial users, some of us run our businesses from home!!

Parsonage Farm shopping needs something else!

Barnham Inn - if it was done up people would use it!

Small scale start up units badly needed for new businesses.

Support local tradesmen and businesses.

More and more people are working from home, but the current infrastructure cannot support the higher speed of broadband.

Potential need to explore our tourist assets.

Proposed development at Pollards Nursery would remove greenhouses which were to remain as a condition of the planning consent for new greenhouses. This would reduce potential employment. Would approval of this development be legally correct?

Out crops on road

More cycle carriages on trains

So much character being overlooked in Eastergate tourism.

The government should fund the rail bridge at Woodgate.

Social community is very important.

Improve frontage and impressional features of the village.

Advertise the hidden gems such as the conservation area of Barnham.

We have had family from France and America visit and enjoy walking in countryside, churches of Eastergate, Aldingbourne, the local charity shop, restaurants and shops, fish and chips. The look of old and beautiful houses and gardens was a big appeal. We are so lucky it is a beautiful area.

Re-engineer the footpaths along Barnham Road.

To improve links between business and school leavers would be fantastic to have. My son given the opportunity to work/train/gain experience locally would not only save time but increase the attraction to the area. My husband and I both worked and trained in local companies at the start of our careers.

Being close to work is fantastic.

Compatible business to the area.

Quality not quantity.

Reverse economics. Draw commuters in rather than the other way round.

Stay with agriculture and horticulture. Stick with what you are good at.

Not enough relevant educational subjects e.g. IT coding.

Parking is needed for commuters from the train station and free parking for shoppers.

Shouldn't season ticket prices be increased to include car parking.

Railway should fund commuter parking improvements.

Parking time zones

Enforcement of double yellow lines

Free parking would assist businesses.

Car parking in Barnham killed the goose that laid the golden egg.

Enforcement of parking restriction would benefit the village.

Why not make the Co-Op car park limited stay and remove the fee. Commuters could not use it then.

## 8. Information taken from sticker boards completed by residents at the open days October 2013.

Barnham & Eastergate Neighbourhood Plan Consultation Presentation Results: 12/13.10.2013

Do you agree with a plan for our Villages that seeks to:

	Analysis Basis:						RANK					
	A No. Agree	D No. Disagree	A-D Net No. Agree	n=A+D Net % Agree	n=59 % Agree	n=59 % Disagree	RANK No. Agree	RANK No. Disagree	RANK Net No. Agree	RANK Net % Agree	RANK % Agree	RANK % Disagree
<b>Environment and Sustainability</b>												
Preserve local character, buildings and features?	48	0	48	100%	81%	0%	81%	8	11	6	1	8
Maintain gaps between our villages and other settlements?	52	0	52	100%	88%	0%	88%	3	11	3	1	3
Have no development without a Surface Water Action Plan in place?	59	0	59	100%	100%	0%	100%	1	11	1	1	1
Protect and enhance the floodplain south of the Villages?	53	0	53	100%	90%	0%	90%	2	11	2	1	2
Have no large scale or excessive development?	52	0	52	100%	88%	0%	88%	3	11	3	1	3
Value and improve outlooks and access to green spaces?	42	0	42	100%	71%	0%	71%	13	11	13	1	13
<b>Getting Around</b>												
Maintain and extend our network of footpaths and cycleways?	44	0	44	100%	75%	0%	75%	12	11	11	1	12
Improve road safety as traffic through the villages continues to increase?	41	0	41	100%	69%	0%	69%	14	11	14	1	14
Have additional commuter parking space near Barnham Station?	31	10	21	76%	53%	17%	36%	23	2	24	26	23
Improve residential and retail parking in Barnham village?	45	1	44	98%	76%	2%	75%	11	6	11	18	9
<b>Community, Leisure and Wellbeing</b>												
Support local school places being available for our children?	46	0	46	100%	78%	0%	78%	9	11	9	1	9
Improve play facilities for our children?	37	0	37	100%	63%	0%	63%	17	11	17	1	17
Offer better community activities for our young people?	39	0	39	100%	66%	0%	66%	16	11	16	1	16
Plan for an aging population?	41	1	40	98%	69%	2%	68%	14	6	15	18	14
Improve access to Sport and Leisure activities for all ages?	33	1	32	97%	56%	2%	54%	21	6	20	20	21
Provide some new allotments for residents?	37	2	35	95%	63%	3%	59%	17	3	18	24	17
Improve Healthcare provision and secure a new medical centre in Barnham?	49	0	49	100%	83%	0%	83%	5	11	5	1	5
<b>Housing and Design Quality</b>												
Support small scale development that meets local housing needs?	49	2	47	96%	83%	3%	80%	5	3	7	22	5
Build up to a maximum of 350 new homes over the next 20 years?	34	16	18	68%	58%	27%	31%	20	1	26	27	20
Ensure all development is energy efficient, sustainable and does not cause flood/drainage issues?	49	2	47	96%	83%	3%	80%	5	3	7	22	5
Enforce design standards and reinforce character of the Villages?	46	0	46	100%	78%	0%	78%	9	11	9	1	9
Energy efficient sustainable development	36	1	35	97%	61%	2%	59%	19	6	18	20	19
<b>Employment and Enterprise</b>												
Support sustainable growth and employment in local shops and businesses?	32	0	32	100%	54%	0%	54%	22	11	20	1	22
Promote education and training opportunities for all?	27	0	27	100%	46%	0%	46%	24	11	22	1	24
Build links between our schools and local businesses?	27	0	27	100%	46%	0%	46%	24	11	22	1	24
Improve online access for commercial users?	20	0	20	100%	34%	0%	34%	26	11	25	1	26
Promote and support Tourism in the Villages and surrounding areas?	16	1	15	94%	27%	2%	25%	27	6	27	25	27

## 9. Responses to Regulation 14 consultation

Consultee	Comment	Response
Marine Management Organisation	I can confirm that the MMO has no comments on this document as the geographical area it covers does not include any area of the sea or tidal river and is therefore not within our remit.	No action needed
Highways Agency	We do not have any comments at this time.	No action needed
West Sussex County Council Planning	Given that the pre-submission Neighbourhood Plan for Barnham and Eastergate includes the proposed allocation of small scale housing sites, it should be noted that site specific principles in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific principles at this stage.	Action to be taken at the planning stage or as pre-application advice



Consultee	Comment	Response
Simon Deacon BSc MSc FGS	<p>I suggested an amendment or additional policy relating to school provision:</p> <p>“Any (unplanned or planned) development <u>must</u> provide a financial contribution to ensure sufficient facilities are in place for children to attend primary schools in Barnham and Eastergate.”</p>	See Policy CLW8

Consultee	Comment	Response
<p>Ms Gleadle and Mr Hillier Barnham Road</p>	<p>Looking at the neighbourhood plans for 100 homes in Eastergate of which up to 50 have already been approved at Brooks Nursery site and small infills, we think the remaining 50 should be sited as proposed in Plan A.</p> <p>However, I see that access for the 100 homes will be entirely onto the Barnham Road. This road is already approaching gridlock and cannot sustain 100 [likely to be many more] vehicles travelling along this road, many of which would be going in the direction of the war memorial roundabout for onward travel to Bognor and Chichester or northwards on the A29. In our view access for the homes under Plan A should be from Fontwell Ave as well as Barnham Road, to avoid increasing the traffic load at the war memorial roundabout and also for safety reasons. Surely an estate of houses needs more than one exit in case of emergencies such as fire or ambulance.</p> <p>As for Plan B, we would appose this on the grounds of all the wildlife in the old orchard.</p> <p>Whatever the plan, the Croft surgery would need to be extended.</p>	<p>To be dealt with in negotiation with the developers</p>

## **Environment Agency Response**

We are supportive of Section 2.2 on flooding and the future adoption of a Surface Water Action Plan for the area.

We also welcome the acknowledgement of policies aimed to contribute to sustainable development including appropriate flood protection measure to help minimise the impact of climate change; preventing harm to the water environment; the assurance of flood protection and drainage infrastructure before development within the area takes place; the reduction of water discharge and long term maintenance for flood protection and SUDS.

We also support Objective 2B, especially in terms of addressing drainage issues within the Neighbourhood Plan area. The level of information gathered and understanding of the local drainage issues is welcomed and gives of detailed overview of some of the challenges faced in this area. We would recommend, however, that you further consider the wording of some of the policies to ensure they will achieve what you want. For example, ensuring that recommendations from a completed Surface Water Management Plan are taken forward through new development.

We note that 100 new homes will be required during the period of 2014-2019. According to Appendix F, up to 60 dwelling will be put forward at land north of Barnham Road, Eastergate. Part of this site lies within Flood Zone 3 as defined by the National Planning Policy Framework (NPPF) as having a high probability of flooding.

In accordance with the NPPF, Paragraph 100-102, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA).

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken.

It is important that your Plan also considers whether the flood risk issues associated with this site can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.

We have worked with and supported your Local Planning Authority as they develop their Community Infrastructure Levy. We would welcome the opportunity to work with you to ensure environmental infrastructure is taken into consideration when funding local infrastructure.

## **BNEG NDP Response**

The NP has taken into account the need to apply the sequential test but all land in the parish that has not yet been developed is either outside of the defined built up area boundary or lies within the Green Infrastructure Corridor which residents do not wish to see developed. The land allocated for 60 dwellings is partly within Flood Zone 3 but much of the land is outside the zone. Careful consideration to the best possible layout of the site will need to be given to ensure that flooding issues are not exacerbated.

## **Linden Homes Response**

Dear Sirs,

On behalf of our client, Linden Homes we are pleased to comment on the draft Barnham and Eastergate Neighbourhood Plan Pre Submission Draft 2014-29 and supporting Site Appraisal Report. Our comments are made within the deadline of 17th November, and we would like to reserve the right to elaborate on them at the forthcoming Examination.

### **Background**

Linden Homes has a controlling interest in 10.9 ha of land north of Barnham Road and you will recall that we provided details of a proposed development comprising approximately 100 dwellings with community facilities and a replacement doctors surgery to both Parish Councils in August this year. Naturally, we are delighted that the draft Neighbourhood Plan has selected part of the site as a preferred development site for 60 dwellings and we are pleased to support its allocation in principle.

However in making our comments, we have noted the further three Site Option Plans prepared by Scott Brownrigg posted on Eastergate Parish's website in October this year. Plan 3 indicates a possible eastern extension of the proposed allocated development site in the Neighbourhood Plan north of Barnham Road to increase the overall housing allocation of the preferred site from 60 to 100 dwellings with the addition of an extended medical centre.

The whole of the site shown on Plan 3 is under the control of Linden Homes and also includes land currently occupied by the Croft Surgery. As we explained in our August submission, of significance is the inability of the Croft Practice to be able to implement the outline consent already achieved for the surgery extension (on land to the west of plan 3 that is not presently included) and is keen to work with Linden to assist with the delivery of the consented scheme. The doctors provided a letter with our previous submission that demonstrates Linden Homes and the GP surgery are working together to progress the masterplan which will also include land to the west which benefits from outline consent.

For these reasons, whilst Linden supports the proposed allocation of 60 dwellings in the draft Neighbourhood Plan its strong preference is to extend the development allocation as shown on the Plan 3 option, albeit further assessment will be required to determine the illustrative layout and various land uses within the masterplan. Linden Homes would be pleased to work with Scott Brownrigg to develop these concepts further. The increase to 100 dwellings and additional community uses would allow for a more comprehensive masterplan and would more likely assist with

the delivery of a new medical centre.

The Neighbourhood Plan consultation will assist with informing what the preferred community uses could be and Linden is pleased to confirm its willingness to work with the Steering Group during the next stages of the Neighbourhood Plan preparation process to help deliver these uses (subject to overall viability) in association with the required housing .

### Scope of Representations

These comments support the inclusion of the allocated land north of Barnham Road Eastergate (reference Policy Proposal 6D-P1) identified in Appendix F of the Neighbourhood Plan and Site Appraisal Report as a preferred housing site.

However, for the reasons explained above we propose the allocation is extended to facilitate an allocation of 100 dwellings with medical centre (land at the consented site to the west) and other community uses to include land to the east . Our specific comments on the Plan concern the following:

1. Introduction
2. Neighbourhood Plan Policies
3. Appendix B & Appendix F
4. Map A & MapB

### Introduction National

#### Policy

We are pleased to note that the introduction has referred to the National Planning Policy Framework (NPPF) but in our view it would be helpful if the broad national planning policy principles of relevance to the preparation of Neighbourhood Plans were set out more clearly.

As noted in the NPPF (paragraph 184), the preparation of a Neighbourhood Plan is a joint responsibility between the local community and the district planning authority in exercising their role as plan making authority. Neighbourhood Plans it states, should reflect the district Local Plan policies and neighbourhoods should plan positively to support them. Neighbourhood Plans and orders are required therefore not to 'promote less development than set out in the Local Plan or undermine its strategic policies'.

Elsewhere in the NPPF at paragraph 14, the presumption in favour of Sustainable Development is defined and for plan making means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area; and



- Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change ...'

In our view, this national policy simply points to the need to meet the development needs of an area in a way that maximises flexibility and allows a change of direction where this is justified. We are pleased therefore that the need for flexibility appears to have been embraced in the preparation of the three options prepared by Scott Brownrigg for Eastergate Parish Council and the proposed option to extend the housing allocation of land North of Barnham Road to possibly cater for 100 dwellings and medical centre. These options should be reflected in the Draft Plan and referred to in the actual policies of the Neighbourhood Plan rather than left as an option in a separate series of plans posted on the Parish website. The site appraisal report should also be amended to take account of the wider area as shown in the three options.

### The Need for Flexibility in the Neighbourhood Plan

The timing of the Neighbourhood Plan coming forward in advance of the District Council's own Local Plan is another reason justifying an increase in the proposed allocation to 100 dwellings. The 'Coastal West Sussex Strategic Housing Market Assessment (SHMA) Update- November 2012' will inform the preparation of the Arun District Local Plan and its housing requirements.

Until we know what the new Local Plan is setting out as its housing requirement District wide, we cannot know whether the identified needs in the updated SHMA have been addressed or not. In our view, it would be prudent therefore if the emerging Neighbourhood Plan increased its baseline allocation from 100 dwellings overall to around 150 units to ensure it is sufficiently flexible as required by the NPPF. In this way, the Neighbourhood Plan would be able to show that it has taken a responsible attitude to meeting its share of housing need and above all, show that it has been prepared in a fully flexible way and capable of meeting future development needs even if they are increased in the Local Plan without needing an early review. Otherwise the Neighbourhood Plan runs the risk of being out of conformity with the Local Plan from the beginning and is unlikely to be successful at the referendum stage.

### Neighbourhood Plan Policies

The reference to the Presumption in Favour of Sustainable Development in Section 2 of the Plan has misquoted the guidance from the NPPF as this applies to Local Plans of Local Planning Authorities rather than Neighbourhood Plans prepared by Parish Councils. Paragraph 184 of the NPPF provides more relevant guidance for the Neighbourhood Plan which is that it must be in general conformity with the strategic policies of the Local Plan and should not promote less development than set out in the Local Plan or undermine its strategic policies. Paragraph 173 is also

highly relevant for the draft Plan in stating that:

'Pursuing sustainable development requires careful attention to viability and costs in plan making and decision taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably, is threatened'.

As it stands therefore, we believe that many of the suggested policies impose unnecessary burdens on the delivery of the development allocations and should be reconsidered. We are particularly concerned about policy 2B-P2 which requires completion of the Surface Water Management Plan for Lidsey Catchment and the Aldingbourne and Barnham Rife Strategy which would impose an unnecessary burden and constrain the Plan allocations coming forward timely and viably.

Policy 2E-P1 requiring all dwellings meet code level 4 is another potential constraint whilst policy 4A-P2 requiring bungalows (with Appendix F being overly prescriptive about the mix of houses) could impact on layout and viability.

Policy 6D-P1 should be reworded to refer to market housing with affordable housing to meet locally assessed housing need and we would suggest the actual site allocations are referred to in full rather than cross reference the sites listed in Appendix F. Policy 6D-P2 supports the amendment of the built up area boundary as shown on Map A, but to provide the necessary flexibility in accommodating the full 100 dwellings and medical centre, the boundary on the Map A needs to be extended further east as referred to below whilst including the consented land for the medical centre to the west.

## Appendix B

Appendix B should be amended to refer to the 'Coastal West Sussex Strategic Housing Market Assessment (SHMA) Update- November 2012' and the National Planning Policy Framework.

## Appendix F

Appendix F should be deleted and the main site allocations included earlier in the Plan as part of the policies themselves. The text referring to the site - land north of Barnham Road - should be amended to refer to 100 dwellings and other community uses.

It should not specify 2 and 3 bed open market houses/bungalows because the housing mix and layout will have to meet the housing need that exists in the Parish. It would be better if the policy simply referred to a housing allocation of around 100 dwellings including affordable housing in accordance with the requirements of the Arun District Local Plan. To maximise the flexibility of the Plan and to assist with early delivery of the medical centre there should be no phasing restriction attached

to the allocation.

## Map A and Map B

The new built up area boundary and the extent of the allocated housing site on Maps A and B respectively must be amended to allow for the inclusion of the land to the east of the proposed allocation to accommodate 1 00 dwellings. Map B should also be amended to include reference to the medical facility as part of the larger allocation on land to the east. The Site Appraisal Report should also be amended to reflect changes in the main document.

We trust these comments are helpful and we look forward to contributing to the next stages of the Neighbourhood Plan preparation process. We are copying these representations to Barnham Parish Council for its own information.

## BENP Response to Linden Homes

It should first be noted that the plans drawn by Scott Brownrigg were created for illustrative purposes only to provoke debate at the NP open day and consultation. They were never presented to residents as layout options.

**Linden make reference to Para. 184 and Para.14 of the NPPF and the need to “not promote less development than that set out in the Local Plan.**

It is the view of the BENP group that BENP promotes exactly the quantity of development set out in the “Parish Allocations” within the Local Plan.

The Local Plan does meet the declared needs of the area through a combination of the permissions already given, the parish allocations and the strategic allocations. The role of the NDP is to choose the appropriate dwelling type and to place the parish allocations within the neighbourhood.

The flexibility referred to in para 14 is flexibility to adapt to rapid change in, for instance, economic circumstances over the life of the plan, not flexibility over choice of the housing need at the start of the plan period. The needs have been declared and the parish allocations made.

**Linden refers to the need to accommodate potential additional dwelling allocation from the yet unadopted CWSGBLSP. Linden also suggests that this neighbourhood needs to be flexibly prepared to accept the additional dwellings proposed by Linden, but not yet proposed by ADC, to ensure that it is “meeting its share of housing need”.**

A recent examination of Arun housing growth by parish indicates that, from 1991, Eastergate will have seen the largest parish housing growth in the whole of Arun and with the current allocations Eastergate will be 7<sup>th</sup> and Barnham 12<sup>th</sup> in the development density scale for the 31 parishes of Arun District. This neighbourhood has already accommodated far more than its fair share of Arun District Development.

To imply that this neighbourhood has not yet met their share of housing need and may not be in conformity with the Local Plan is simply not true.

It is also clear that the most pressing need for housing in our neighbourhood is for affordable housing and housing for the elderly.

**Linden appear to suggest that NDPs are not required to ensure that all development is sustainable.**

The minister for planning is quoted within the NPPF as saying “The purpose of planning is to help achieve sustainable development.”

Para 6 of the NPPF says - The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system.

It is our view that the NPPF clearly states that the purpose of the whole of the planning system is to ensure sustainable development and this must, therefore, include NDPs.

**Linden quote Para 173 - Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.**

It is our view that NPPF Para 173 falls within the section headed Plan Making which covers paras 150 to 185. The whole of the section from para 150 to 182 inc. specifically covers Local Plans. The planning obligations and policy burdens referred to in para 173 are those within the Local Planning Authority’s Local Plan.

All the planning burdens contained within the BENP already exist within the ADC Draft Local Plan.

**Linden go on to suggest that some of the NP policies threaten the developments viability.**

Policy 2B-P2 - completion of a Surface Water Management Plan.

2E-P1 - development should meet Level 4 of the Code for Sustainable homes in terms of energy efficiency.

Since the local area suffers regularly from surface water flooding and the SWMP describes the measures necessary to minimise such flooding, it can only be prudent to insist that this crucial plan is available before approving the content of specific planning applications. Support for this policy is given by the Environment Agency.

The Code is intended to set the future direction of Building Regulations in relation to carbon omissions from energy use in the home. The policy does not require the highest level(6) and is felt appropriate in response to known climate change. WSCC has a target to reduce carbon emissions by 40% by 2025 and it is felt that all new developments should aim to be as energy efficient as possible.

4A-P2- Housing mix

6D-P1

The required dwelling codes are set by ADC. Regarding housing mix and location, NDPs are permitted to set local planning policies providing that they do not conflict with over-arching strategic policies set by the LPA.

## **10. Objectives and Measures**

10.1 The Vision for Barnham and Eastergate is important and the success of this Plan will be to ensure that measures taken and policies imposed reflect the key issues and priorities identified in the vision.

Looking at these principles in more detail, this will be achieved through application of the policies

### **Supporting employment and enterprise:**

Policies relating to support for existing and proposed businesses.

### **Making the most of our diverse natural environment:**

Policies relating to flooding and drainage, tourism and open spaces

### **Valuing our green spaces:**

Policies relating to Local Green Space and Local Open Space

### **Promoting and Supporting safe travel:**

Policies relating to improvements to the cycle network and improved car parking

### **Promoting and supporting Education and Training Opportunities:**

Policies to bring the local business community together with the local resident community to maximise employment opportunities.

**Fostering a well ordered and vibrant community:**

Policies to protect and enhance historic and environmental features and to retain the local character of the villages

**Barnham and Eastergate must retain their distinctive heritage and identity:**

Promoting strong design principles and protection of heritage assets

**11. List of persons consulted under Regulation 14**

West Sussex County Council  
Arun District Council  
Natural England  
The Environment Agency  
English Heritage  
Network Rail  
The Highways Agency  
Marine Management Organisation  
NHS Coastal West Sussex CCG  
Southern Electric  
British Gas  
Southern Water  
Sussex Police

**Other consultees**

All Barnham and Eastergate households  
All Barnham and Eastergate Businesses  
All Barnham and Eastergate Schools