

# **ARUN CORE STRATEGY**

**OPTIONS FOR GROWTH**

**CONSULTATION  
SUBMISSION**

**BY THE**

**VILLAGES ACTION  
GROUP  
(VAG)**

**31<sup>st</sup> March 2009**

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## INTRODUCTORY STATEMENT

This document has been produced on behalf of the residents of Westergate, Eastergate and Barnham to voice their concerns and make reasoned objection to the proposal in Option 3 of the Core Strategy to site 2,500 homes in these villages. For the purposes of brevity these will be referred to as WEB in the rest of this document but this in no way implies that we accept Arun District Council's definition of them as "suburban" or the appraisal of them as one settlement rather than three distinct villages, each with its own positive and negative features that are not identical. On some matters they can be treated equally, for example all drainage output is to the Lidsey plant and their comparatively close proximity to one another does have implications for biodiversity. Nevertheless essentially they are three individual settlements, each with their own character and community.

Whilst we concentrate for the most part on WEB, we are mindful that other inland settlements are also under threat. However, the Eco Town site has been comprehensively dealt with during the Select Committee EiP, whilst we do not have the detailed knowledge of Angmering that would allow us to comment effectively about its respective merits with regard to development. We do understand from a representative of that village that many of the concerns we raise in the following document are equally applicable with regard to their own village.

At this stage we would point out that we feel we are at a distinct disadvantage compared with the locations for large scale Strategic Development named in Options 1 and 2 where fully developed plans have been produced and placed in the public arena for perusal, comment and challenge. At the time the Eco Town Select Committee EiP was set up it was the understanding that all would be given a similar opportunity as was afforded the residents of Yapton, Ford and Climping and the rest of the District to voice their opinion either for or against the proposed development in a public forum where assertions can be thoroughly examined and challenged in full view of the people who will be most affected by it. If there are no representatives of the landowners responsible for targetting the WEB villages with large scale development who are willing to meet the challenge of local residents in this way, then Arun District Council have an obligation to step up to the plate on their behalf.

At various recent meetings with local residents the Chief Executive has repeatedly stated that there is no one landowner or consortium of landowners involved with the Option 3 proposals for major strategic development at WEB. This is untrue as the Planning Department are well aware. A consortium of landowners under the guidance of planning consultant, Anthony Greenwood, and the estate agents Henry Adams, have been promoting a development in our location since 2002. Full plans and map of the holdings involved were submitted to West Sussex County Council for consideration in their Structure Plan, which was the first time many residents even knew their village was under threat, and upon which Arun District Council submitted their comments. At no time have the Consortium ever seen fit to involve either the Parish Council or other village representatives in their discussions with first WSCC and then ADC. As a result we were not able to mount a sufficiently robust campaign or challenge the assertions they were making in the forum of the Structure Plan EiP. Had we been able to do so, it is likely the findings of the Inspector would have been different. The only voice that was heard apart from that of the Consortium was the endorsement of the scheme by Bognor CiViC because of the alleged benefit to the town of the By-pass that was linked to the proposal. This gave undue weight to the argument that the road would benefit Bognor's regeneration, an assertion that has never been truly examined for veracity.

In the succeeding 7 years we have been working largely in the dark about what is currently being promoted for our villages. At no time have the Westergate landowner/developer consortium approached either the Parish Council or VAG to engage with the local community about their proposals. Neither has Arun District Council seen fit to involve us in negotiations. All information has had to be gained via the local grapevine or through the newspapers when the promoters chose to advertise their plans to suit their agenda.

In addition, a Freedom of Information Act request was made to West Sussex County Council with regard to the submissions that were made at the time of the West Sussex Structure Plan. A similar request to Arun District Council with regard to more recent information was met with a negative response, as have formal and informal requests for details concerning current proposals.

That Arun District Council were aware of this situation is evidence by the statement in their Evaluation Matrix produced in 2007 to support the LDF process which says with regard to the deliverability of the proposed development for West of Westergate that there is a: "Major housebuilder actively promoting development in this location." It also mentions in several places that whilst some aspects of the scheme had been taken into account by the developer in assessing its viability, there were doubts about some others having been included. This would suggest that at least some documentation had been submitted or discussions taken place with the promotor.

The SHLAA map that was recently issued as part of the Habitat appraisal conducted by EDAW also confirms that the boundary to the area of search on the western side of the village of Westergate not only follows the exact line of the By-pass but also corresponds exactly with the land put forward under the Structure Plan. Every parcel of land previously submitted as part of the Consortium bid to the Structure Plan on the western, eastern and northern sides of the village is included in the SHLAA, effectively ringing the entire settlement in development land. Furthermore Henry Adams has been attempting to sell one of these parcels of land on behalf of the landowner since last August, marketing it as a "strategic development opportunity." Note please: not possible or potential but simply a bare faced opportunity. The Chief Executive's attention was drawn to this fact by the author at the time it first appeared on the market.

VAG was also represented at every day of the Eco Town Select Committee EIP, contributing to the debate over the merits of the Eco Town Scheme and challenging the assertions of the developers where appropriate. We would note at this point that many of the arguments brought forward by various parties against the Eco Town Development in the Ford location would equally apply to any large scale development in the 5 Villages area, whether for 2,000, 3,000 or 5,000 homes. In particular it should be noted the delicate balance that exists in service provision in the villages between supply and demand, the fact that facilities in one location are often intended to serve the wider area and that there is therefore little scope to assimilate a large influx of new residents in one village area on the basis of the services currently available. Thus suggesting that one location is better than another on the basis of facilities found within that actual village is nonsense because new provision would have to be made if both existing and new inhabitants were not to suffer hardship and deprivation.

Hence we are very disturbed to read the EDAW sustainability evaluation which has been done on the basis of existing social infrastructure and concludes that these are a positive factor in favour of a major expansion of the inland villages in Option 3 "without need to build or provide new facilities".

We would also note that the targeting of Westergate, Eastergate and Barnham with such a large combined total of housing as is contained in Option 3 is not a consequence of the increased figure recommended by the Housing Minister or the result of the additional sites brought forward under the recent Strategic Housing Land Availability Assessment. Among the various scenarios being tested in 2006/7 against a range of criteria was one in which the then entire Greenfield allocation of 3,000 homes would be placed in these villages, split 1,500 Westergate and 1,500 Eastergate/Barnham or Westergate would be combined with one or other of the urban extensions proposed, likewise for 1,500 each. Ultimately any scenario involving our villages was rejected for the following reasons:

It would result in a largely dormitory settlement with the majority of new residents commuting to Worthing, Chichester and beyond for work and likely their shopping and leisure requirements as well.

It would significantly alter the character of this rural area.

It would be difficult to achieve and retain the character of the individual villages.

Expansion of local schools to accommodate the additional numbers, in particular the secondary schools, would be difficult to achieve.

Very poor employment prospects in the area even with the employment site provided.

The new housing would have limited access to many services except what could be provided by the development itself.

The affordable homes would be a long way from the areas of greatest need.

It would create additional congestion on the B2233 at Crockerhill, on the A29/A27 at Fontwell and along the A27 at Westhampnett.

There could be drainage/run off problems in the area owing to the high water table. (At this point the Strategic Flood Risk Assessment had not been completed).

It was the least accessible area in terms of police response times. Also poor ambulance response times. The increased traffic in the area caused by the development would likely exacerbate these problems.

Whilst some of the area had been designated medium/high capacity for change (low sensitivity) in the Landscape Study, other parts had been designated low capacity (high sensitivity to change). In fact much of the area is very visible from the South Downs, in particular Halnaker Hill, in addition to forming the setting for two conservation areas and several listed buildings.

Even the presence of the railway station at Barnham was insufficient to offset all the other disadvantages of the location for large scale strategic development. Note that the suggestion of a new station at Westergate had been dropped from the proposals, even though this was one of the justifications supplied for this location at the time of the Structure Plan EiP, along with the provision of a Bypass to assist the regeneration of Bognor. The inclusion of these two items in the submission was considered the "special justification" needed by the Inspector to consider the scheme, having already stated the area ordinarily would not have met the requirements of PPS3.

It should also be noted with regard to the By-pass that the original LDF evaluation team only concluded that it *could* possibly assist the regeneration of Bognor, not that it positively would. Furthermore the proposals were inconclusive as to whether it was possible to fund the entire road from developer contributions or that provision had been included for the essential improvements to the junctions on the A27 that would need to be carried out in conjunction with the scheme.

What is evident is that the current evaluation has ignored the original sustainability findings of the Evaluation Matrix, as well as the considerable evidence brought out at the Ford Eco Town Select Committee which the Council used to argue against a development in that location. The team responsible for this latest document have concluded that the entire area east of Barnham station, including that part of Barnham village, Yapton and Ford airfield are wholly unsuitable for any size of major development, yet have judged the western half of Barnham, Eastergate and Westergate as capable of sustaining a large scale strategic allocation of 2,500 homes. In doing so, they severely weaken their own arguments against the Eco Town or a similar sized development to WEB at Ford Airfield and risk condemning the entire 5 Villages area to major development in one form or another.

An analysis follows expanding on the above points. Where appropriate this is related to the Core Strategy Vision Strategic Objectives SO1 to SO7. Arun District Council is abbreviated to ADC.

Owing to constraints of space and time there are some important areas that have not been able to be addressed in this document, for example the rural economy and the issue of accommodation for gypsies and travellers, although we do note that the majority of the recommended sites are in the WEB area and there is no allowance for provision from 2016-2026.

There is also very little comment on the measures with regard to climate change, apart from a brief section on drainage and flooding. These are factors that are relevant throughout the District and this document is chiefly a brief resume of the critical issues that particularly relate to Option 3 WEB villages. However, we reserve the right to comment on any other areas we have not specifically addressed in this document at any future debate in public, either local or an EiP by external inspector.

We would also point out that as of today's date, 31<sup>st</sup> March 2009, the Strategic Housing Land Availability Assessment has still not been published on the ADC website, despite assurances that it would be in time for its contents to be considered within this public consultation. Once again, we reserve the right to make comment upon and challenge any assertions in that document when it is finally made public.

VILLAGES ACTION GROUP

31<sup>st</sup> March 2009

## HOUSING NEED - Objective SO2

At the Eco Town Local EiP it was repeatedly emphasised that the majority of people on the housing list wished to live in their current urban location. Whilst some had indicated an interest in moving to the Eco Town this was likely based on their enthusiasm for the environmental aspects embodied in the scheme and the promised community facilities that would accompany the development, together with the possibility of an early allocation of affordable housing. Most local participants in the debate were concerned when the developers indicated they would not commence community facilities until an initial 1,000 homes threshold had been reached. All acknowledged that people on the housing list are often the least affluent and most vulnerable members of the community and thus heavily reliant on all the social services and facilities that are commonly found in our urban centres but only sparsely available in the villages. Since they were unlikely to have their own cars and be reliant on public transport, there was the danger they would become isolated and miserable, unable easily to access community and family support. This was thought to be the case even though they would have use of the 700 bus route that would give them quick access to either Bognor or Littlehampton every 15 minutes throughout the day and up to 8.30 p.m. at night.

How much worse would be their situation under Option 3! Primary schools and secondary schools in the WEB area are all currently over subscribed and not anticipated in the future to have anything like the number of places needed for a development of 2,500 homes. The only medical centre has long been full, with residents from Barnham already having to travel to Yapton for an appointment with their GP, an exercise that takes an entire morning for a 10 minute appointment due to our poor bus service. The only dentist is in Walberton. Community facilities are already fully utilised at the local sports and community centres. Youth provision is underfunded and struggles to cope with present numbers. The nearest family centre is in Yapton. There are very few job opportunities within the WEB villages whether on a full or part-time basis. These are just some of the problems that would face new residents accustomed to the more numerous facilities of Bognor, casual/seasonal job opportunities, entertainment and frequent bus services to access those not within immediate walking distance.

As at May 2008 the number of people on the housing waiting list was broadly:

Bognor Coastal Conurbation	51.5%
Littlehampton Coastal Conurbation (inc.Ferring)	35.5%
East of Arun Inland Settlements	3.7%
West of Arun Inland Settlements (inc. Arundel)	9.3%

If apportioned between the overall housing figure for the District of 11,500, including both urban and Greenfield sites, this would result in the following:

Bognor Coastal Conurbation	5923
Littlehampton Coastal Conurbation	4083
East of Arun Inland Settlements	426
West of Arun Inland Settlements	1012

As can be seen, whilst this broadly corresponds with the figures in Option 1, it is wholly at odds with the figures for Option 3. Essentially the proposal to place 1,500 homes at Angmering and 2,500 homes in the WEB area would result in 34% of people not being even remotely close to their preferred location (including those in the inland settlements not placed in their stated preference) with all the disadvantages to them highlighted above and would be contrary to objectives SO2, SO5, SO6 and SO7. This percentage with respect to the WEB Greenfield sites rises to a staggering 80%.

However, this does not imply that Option 1 is entirely acceptable when working to these criteria because the inland allocations east and west of the River Arun are still mainly confined to just two areas, Angmering and WEB respectively. The hierarchy of settlement in the western settlements according to population (based on the 2001 census) is Yapton, Barnham, Arundel, Westergate, Walberton, Slindon and Eastergate. The hierarchy of housing need is Arundel, Barnham, Yapton, Walberton, Eastergate, Slindon, Westergate (If you include the rest of Aldingbourne parish in the total it would move up Westergate up to fourth but still only just ahead of Walberton and far less than Yapton). Thus the greatest need is from Barnham eastwards, not Barnham westwards with a significant proportion in the two northern village settlements. This means that with the proposals as they currently stand all those people on the housing list who have stated a preference for another village or the town of Arundel will also be placed some way from their preferred location, judging by the amount of reduction of the "other" total in Option 3 which would indicate that in Option 1 the majority of the housing would still be located at the western end.

In the case of the more remote villages this preference has been stated despite the drawbacks of lack of facilities of which they are no doubt aware and clearly being close to family and friends in a familiar location is of greater importance. The numbers involved are small enough that it may well be possible to account for their needs by means of Rural Exception Sites.

The situation in the larger settlements and particularly Arundel is somewhat different as the numbers are far greater and yet no provision has been specifically made for their needs in the apportionment of the housing. This is particularly strange in the case of Arundel and Findon because in the original Preferred Options Document of August 2007 they were specifically mentioned as being suitable for a share of the small scale strategic allocations in order to cater for the needs of their communities. Why is this no longer the case?

A number of small scale sites have been identified at both Arundel and Findon and whilst some may have physical constraints, this surely cannot be true of all the sites. Arundel overall has the best facilities of any of the inland settlements in the District, indeed largely superior to those in the combined WEB area. (For some inexplicable reason it scored "poor" for transport on the 2006 Sustainability appraisal despite having a main line station within walking distance of the majority of the residents). Yet the needs of the least affluent members of this Town's community are apparently being ignored. If it should prove impossible for at least some of these people to be placed in their settlement of choice, have they been asked to state a second preference? It would be helpful to know whether this would be for another inland settlement or their priority would be for access to better facilities in one of the urban areas.

Moving onto the villages of Yapton, Walberton and Slindon, whilst their housing needs do not bear comparison with those of Barnham and Arundel, in the case of Yapton they are in fact more than double those of Aldingbourne/Westergate or Eastergate, whilst those of Slindon and Walberton are comparable. As stated above, those people who have expressed a preference for these latter two villages will have done so in spite of any shortfall in facilities, clearly because that is what they are familiar with and have support in place that can overcome any difficulties associated with this.

As for Yapton, the housing need there is the highest after Arundel and Barnham, as one would expect given its size, and the basic shopping, post office, medical and community facilities are comparable with those in Westergate and Eastergate. It is anticipated that there will be a significant number of vacancies at the local primary school during the next 5 years and it makes sense for the children of this age to be living close to their school rather than have to travel to it from the other end of the 5 Villages. Low income families in this village have the benefit of the 700 bus route to access both Bognor and Littlehampton, plus the presence of the weekly Sunday market.

There are considerable employment opportunities in the neighbouring settlements of Ford and Climping. Indeed of the 1785 jobs recorded for these combined settlements in 2007, 1548 were filled by people commuting into the area from other settlements, the nearest of which is Yapton and within walking distance or a short 700 bus ride. Employers have reported that more workers who come from other parts of the District would like to live closer to their place of work but are unable to do so due to the high cost of local housing.

From the foregoing it is possible to conclude that there is a requirement for some strategic housing in the inland settlements and that this should be proportionate to their identified need, either housing or employment. To do so would not add to the traffic on our roads since it is assumed that the majority of those who have stated a preference for these locations already live there or have close links with it. In the latter case, where this is through employment, it might reasonably be presumed that this will in fact reduce the need to travel. Such would not be the case with the wholesale relocation of people that would occur with Option 3. Obviously the open market housing in any of the options is likely to result in an influx of new people to the area and this will have an impact wherever it is placed but again it is likely to be far greater in Option 3 than Option 1 for reasons already highlighted above and elsewhere in this submission.

The figure of between 450 to 900 homes on Greenfield sites suggested for WEB and rural in Option 1 is too vague and dependent on other factors to be beneficial in meeting the needs of local communities. It would also make us vulnerable to planning applications so long as the numbers within urban boundaries remained unrealised. It makes more sense to apportion a set amount throughout the villages according to their need, including of course the additional open market figure, and where no suitable sites have been identified for a particular settlement, either within the boundary or Greenfield, to reallocate the number to the nearest available settlement or according to the second preference stated, assuming in the latter case that individuals would be consulted on the matter. This would enable both District and Parish Councils to plan effectively for the future benefit of their communities and would also release sites for other uses that are currently being retained speculatively to the detriment of the rural economy.

Since the precise Greenfield allocation is so dependent on what can be realised within the built-up areas, it makes more sense that the larger urban extensions should be planned within variable parameters, starting with the lower figure but with an additional allowance built into the scheme should it prove necessary. Then if a greater number of homes are able to be provided within the boundary of the urban areas, the people on the perimeter will be the chief beneficiaries. This might also add greater incentive to Town Councils to identify and bring forward planning applications within the built-up areas.

At a recent meeting of representatives of inland parish and town councils, including Angmering and Arundel, it was agreed that Option 1 seemed to best serve the needs of the people of Arun but that they had no objection in principle to a more equitable spread of the housing not catered for by urban extensions. VAG also agree that this would better serve the aspirations of the least affluent members of our community whilst at the same time enabling the preservation of the individual character and environment of our villages. We sincerely hope that the District Council will concur with this view.

## HOUSING NUMBERS

In October 2008 VAG posed the question to Arun District Council “Who are these houses for?” In doing so, we were not denying the need for a substantial number of social and affordable homes. Nor was this intended as an attack on our immigrant communities, whom we acknowledge make a valuable contribution to our District. What is of concern is that in order to achieve the level of affordable housing, a greater number of open market housing must be built. This is a problem on two levels. Firstly, it makes control of the planning process too much under the control of landowners seeking to profit from the system and the developers who fund it. Secondly, there is the concern that it will not produce the sort of housing that is now in short supply in the District but was once plentiful, namely small to medium sized family homes with a decent sized garden.

The Government’s policy of allowing gardens to be viewed as potential brownfield sites is short sighted if the aim is for sustainable communities. As a consequence many properties within urban areas have little or no garden to speak of. This problem has already spread to our villages. Providing public open space and allotments is not a substitute since many people will not allow their younger children out to play in public areas for fear of their safety, whilst they do not wish to see the produce of their labour destroyed or removed by less responsible members of the community. However, low density housing means taking more land in the first place, unless of course you do not subscribe to the notion that current open market housing numbers are either necessary or desirable.

Many of our villages initially developed beyond their ancient boundaries in response to the need for social housing. Woodgate enlarged during the inter war period through a housing initiative by the then Chichester Rural District Council to accommodate poorer residents. Local historians report that many of the families who were evacuated to Westergate from London during the war subsequently decided to stay and the Ivy Lane area was built to accommodate them. Barnham of course initially grew up as a result of the railway and cattle market that was located at the station. What all these have in common is that the people concerned already had some form of strong link to the community on which to base their residence whether it be experience of living there or economic factors. Social housing was planned and funded by the local authority.

The problem is that our villages have outgrown the ability of the surrounding area to sustain them and this is exacerbated with every new growth of housing. People who now move to the villages are either affluent out of District commuters/retirees who can afford the premium price of the open market housing or hard pressed local families where both parents work and simply do not have the time or energy to devote to anything else. The former group tend not to rely on local shops, employment or entertainment as they have the means and money to travel elsewhere, usually by private car, whilst the latter group do place great importance on having access to a good local school, although time constraints will mean it needs to be located very close to home if it is to be considered within walking distance. Presumably Central Government have woken up to this problem which is why their preference now is either for sustainable urban extensions or new settlements, the latter with aim of providing sufficient local employment opportunities and facilities that socially cohesive and independently sustained communities will once again be able to develop.

The greatest criticism that can be levelled at Option 3 is that the Council does not acknowledge that in the case of the inland allocations we are essentially looking at two new settlements. In the case of Angmering this is stuck on the side on an existing village, creating one double the size, whilst the 2,500 homes at WEB would largely envelope the villages of Eastergate and Westergate, if the SHLAA map is anything to go by, ultimately doubling their size into a town the equivalent of the Eco Town that has been comprehensively rejected at the other end of the West of Arun area. Yet the latest sustainability report evaluates the developments on the ability of the current local retail and community facilities to accommodate them and concludes that they are. This is arrant nonsense.

EDAW also suggest in their section on housing that “the villages offer .....a more rural attractive setting for market housing” seemingly overlooking that the fact the development in Option 3 would destroy the very rural setting which might have rendered it attractive to potential purchasers, whilst simultaneously ruining it for existing residents. Thus it would also defeat the objectives of SO2 and SO7.

If people want to live in a town, they will move to a town, if they want a rural or village property, then that is what they will want to buy, not a property that is now situated in an urban sprawl that is a village in name only. The percentage breakdown in the affordable housing very likely reflects the preference of the housing open market as well. The majority of people want urban living with all its advantages of readily accessible shops, entertainment, leisure facilities and services. What they do not want is the worst of both worlds, that is the high density housing associated with urban areas combined with the lack of extensive social infrastructure as is commonly found in villages, which local people are prepared to accept as the price of rural living. Such would occur with the WEB proposals, certainly if the “Masterplan” was drawn up to EDAW’s advice.

We understand that the Housing Minister has now confirmed that if the Eco Town is chosen by Arun District Council the numbers will be “banked” against the housing figures but that if it is rejected by ADC but considered suitable by the Government, then it will be in addition to our current housing numbers. Whilst we deplore what amounts to institutional “blackmail” of our local council, we would point out that if ADC chooses Option 3 or any alternative that results in an allocation of similar magnitude being forced on either of the Option 3 inland settlements, it will severely weaken the Council’s arguments against the Eco Town, which apply equally or to even greater extent to these other locations. The fact that the numbers involved are smaller is immaterial, they will still need substantial investment in community infrastructure to support these numbers and will radically alter the character of the area in which they are located and destroy the quality of life for the present inhabitants, not to mention the hierarchy of settlement and make up of the District as a whole.

Not only that but it will have been done on the basis of a vague future “Masterplan” rather than a properly presented proposal that people will have had the opportunity to study, evaluate and challenge as appropriate as has been done in the case of the other major developments that have been proposed under Options 1 and 2. One of the reasons we applauded the initiative with respect to the local Eco Town EiP is that it took place as an open public forum to which local groups representing their communities could actively contribute without being subject to the time limitations of the Council Chamber and that this occurred *before* any decisions were made. At the time the Council originally decided upon this course of action we were promised the same with regard to the other options. This has not happened and in the case of Option 3 it has continually maintained that there are no proposals with respect to any of the inland developments which as we demonstrate elsewhere is simply not true.

Finally, we would suggest that Arun District Council has not been robust enough in its objections to the overall housing figures. If it had been as active in its objections to the housing numbers as it has been to the Eco Town proposal, may be the Government would have opposed the SE Plan recommendations. Instead ADC have insisted they have identified sustainable alternatives to the Eco Town, when the other options had not even been properly evaluated let alone publically debated, and have stated their principle objection is that the current infrastructure is inadequate and necessary improvements may not all be able to be funded by developers. This implies that if the funding were available, for example from Central Government, then the numbers proposed would not be a problem. We disagree and feel that the numbers themselves are not sustainable regardless of the funding available. Option 1 is favoured by VAG not because it is the best option but it is the only alternative to large scale inland development that would be contrary to “Strategic Objectives” SO1, SO2, SO4, SO5, SO6, SO7 and, if EDAW’s mentality is followed regarding the need for social infrastructure, SO3 as well.

## COMMUNITY INFRASTRUCTURE

Along with the environmental considerations this is the area of greatest concern with regard to the proposals in Option 3 particularly in view of the change of attitude of the Council's officers over this issue and the conclusions drawn in the EDAW sustainability document. In their summary they state that:

“Expansion of Inland Settlements has a variety of both positive and negative effects. The positive effects are mainly in relation to social aspects. This is due to the presence of existing communities and their ability to provide a range of social infrastructure requirements *without the need to build or provide new facilities.*” (Our italics and emphasis).

We have consulted with Angmering and like us they are appalled at this statement which runs contrary to everything residents know about the current state of their facilities, the previous Evaluation Matrix and in the case of WEB, the written statement made by Council Officers to the Eco Town EiP regarding not just the immediate area of Yapton, Ford and Climping but the rest of the 5 villages as well.

Since we assume the representatives of Angmering will be writing to you separately and in any case will have a much better knowledge than us of their area, the following analysis applies to the WEB area only.

### Education - Primary

According to figures presented to the Eco Town EiP by WSCC a development of 2500 homes would generate approximately 525 pupils across the seven statutory years of primary education requiring an approximate new capacity in primary education of 2-3 form entry. It was calculated that by 2012 the combined spare places available at the 3 main primary schools serving the development, Aldingbourne, Eastergate and Barnham, would be 21. With development commencing in 2011, in order to achieve the housing figure of 2500 by 2026, build rate would have to be approximately 166 per year (not 130 as shown in the Core Options pie chart). Assuming an appropriate housing mix, this would result in an extra 35 children per year being added to the area. As can be seen, by the end of the first year the spare capacity of the primary schools will have been exceeded. Whilst spare capacity may have been identified at other schools in the 5 Villages Area, in particular Yapton, this will involve considerable travel for the children involved and with the lack of available public transport will result in either greater number of car journeys taking place or the funding of a school bus service for the primary intake. Even with the projected 115 places available at Yapton Primary, the spare capacity will have been exceeded within 4 years from commencement of the development.

Local children within catchment area of Aldingbourne Primary currently are failing to be offered places at that school owing to its popularity and the increase in population arising from the Limes Avenue development. This has a knock on effect with these children needing to be accommodated at Eastergate Primary, which has only a very narrow catchment area of its own, and thus children on the edge of Eastergate village are already being forced to walk (or travel by car) down to Barnham Primary. Thus the assertion by WSCC concerning the number of places likely to be available at these primary schools in 2012 seems unduly optimistic.

Parents have already pointed out that attending an out of catchment area school places families at a disadvantage when it comes to placing younger siblings and that WSCC tend to be very reluctant to expand current schools or build new ones when places are unfilled at other schools in the District, which is where WSCC anticipated the majority of spare capacity would be, particularly Bognor owing to provision having already been planned as a result of the need generated by Site 6.

The Evaluation Matrix concluded with regard to Aldingbourne primary school that: "Additional places would be needed but existing school would be difficult to expand on the present site. Two small schools would not be an efficient way to meet need." Whilst regarding a development at Eastergate/Barnham it states: "Area wide reorganisation of school provision might be required - new site for Eastergate and expansion of Barnham primary schools."

Even the landowner consortium acknowledged in their submission to the Structure Plan EiP that a new primary school would be required to serve what was then a new development of 1250 homes, half the number proposed in Option 3.

### **Education - Secondary**

Based on the figures presented to the Eco Town EiP, the current roll of Westergate Community School is 750 and St Philip Howard Catholic High School 871. It was anticipated that by 2012 there would be 28 places available at the former and 20 at the latter. It is calculated that a development of 2500 would generate approximately 375 secondary school pupils up to GCSE level age, currently the statutory schooling period. On the rate of build given above, this would generate 25 secondary age children per year. Once again it can be seen that within a two years of commencing the development the capacity of the existing schools to absorb numbers would have been exceeded. WSCC predicted with regard to the Eco Town, where a secondary school was part of the ultimate planned development, that before this was built pupils would have to be accommodated in existing schools, possibly in temporary accommodation. They also stated that a school population would not be viable for a new secondary school, which is odd considering that is the size of the current successful secondary schools in the villages area. It is acknowledged that WSCC education regard "big is beautiful" contrary to expert opinion on the matter.

St Philip Howard draws a large proportion of its intake from the district wide Catholic community, which would not react well should their right to places be threatened. Such is the demand for places at this popular and heavily oversubscribed school that it is now extremely difficult for non Catholics living outside the immediate Barnham area to gain entry if they do not attend a Catholic primary. The former headmaster, Mr Casey, a highly respected educational advisor, always insisted that he felt the school had reached its optimum size and would resist any attempt to substantially increase it as it would prove detrimental to the quality of education and community spirit he had striven to achieve. This school has a small 6<sup>th</sup> form intake. WSCC have stated that its capacity to take extra pupils would be limited and expansion difficult on the site.

Westergate Community School has historically suffered from the drain of the most gifted pupils to Bishop Luffa. As a result it never figured as high on league tables as some other schools in the area based on pure achievement at GCSE in terms of top grades. However, it has featured highly on the value added tables for the improvement engendered in pupils. Ofsted have also highlighted in their reports the fact that there are pockets of real deprivation in the villages, quite comparable with the larger and more publicised ones in the urban areas. Westergate already has a higher percentage of pupils with special educational needs than any other comparable secondary school in the District.

WSCC reported that this school had been designed as a 3 form intake, was already a 4 form entry on completion and is currently a 5 form intake. It was stated this increase had already placed great pressure on parts of the school, e.g. the sports facilities at the adjoining 6 Villages Centre which erodes community access to them. The site was already nearing capacity when the Headmaster obtained funding to expand their facilities further as a result of achieving special status in Visual and Performing Arts. He and his staff have worked very hard to raise the status of this school and the quality of education available to its pupils. Please see his attached letter (Appendix B) concerning the ability of his school to absorb further numbers and his comments on facilities for children and families in the area.

The Evaluation Matrix concluded that “Existing secondary schools would be difficult to expand on their current sites. A large proportion of local pupils commute to Chichester.” However, the number of places available at these schools to children from out of the Chichester area is likely to reduce in the future considering that Chichester is likewise required to accommodate substantial new housing development.

### **Youth Provision**

WSCC stated with respect to the Eco Town that they would wish to see shared community provision for one or two evenings each week and sufficient unsupervised leisure facilities. Westergate currently has a Youth Wing attached to the school that formerly had sessions for different ages from 11-16 on 3 nights per week. Young people attend these sessions from as far away as Climping and Slindon. In recent weeks a shortage of supervisory staff led to a cancellation of the Thursday evening club for the oldest group of 14-16 year olds and as a consequence there was an increase in anti-social behaviour on the school campus after hours, in particular targeting the area where vulnerable adults with learning difficulties were attending evening classes. This does not bode well for a substantial increase in the teenage population unless additional funding for staffing and facilities are made available. Outside of voluntarily run sports and social clubs there are no other forms of entertainment available in the villages.

### **Adult Provision**

In conjunction with the Affordable Housing element of the development, WSCC would wish to see a jointly agreed provision for supported housing for extra care; people with learning difficulties, physical impairments and mental health problems. The current levels of care available would not be able to cope with the additional numbers created by 2500 homes.

### **Retail**

Westergate and Eastergate are confined to 3 small sized convenience stores, a sub-post office attached to one of these at Woodgate and another at the Elm Tree stores in Eastergate, plus a small Spar store at the Texaco Petrol Station. There is very little by way of local fresh produce despite the rural location, probably owing to the fact that most local smallholders immediately adjacent to the village areas are only interested in utilising their land for housing.

Barnham has a better range of shops, including a Co-op, bakery, family butcher, a dedicated post office, pharmacy, hardware store and a bank. There are an incredible number of take away outlets, presumably reflecting the disinclination by long distant commuters to cook on arriving home. There is also the fact that lying on the busy B2233 they receive a lot of passing trade in addition to serving the other villages in the area - who visit them by car rather than on foot or by bus.

The Barnham Trading Post is the most diverse store in terms of its range of items. As with the take aways, its success derives from the fact that many more people drive into Barnham to shop here than walk. The car park is often overflowing including the additional capacity area to the rear. They do sell a limited amount of fresh vegetables, sourced locally wherever possible. There was originally a second hand baby wear and accessories outlet in Barnham but this has recently relocated to Bognor.

It is highly likely that a survey of shoppers would reveal just as many come from Walberton and Yapton as its neighbours to the west, Yapton only being slightly further from central Barnham by car than Westergate and having access to the same 66 bus route. Yapton has its own co-op, butchers and fish and chip shop but Barnham is probably the most convenient location if Indian, Chinese food or kebabs is the preferred dish. Families throughout the 5 villages, particularly those on low incomes, regularly attend the Sunday Market at Ford Airfield where a more extensive range of goods is available. All the larger villages, that is Westergate, Barnham and Yapton, have their own hairdressers but you have to travel to Walberton for a launderette.

Barnham is a good local centre but unless you live in Barnham you need a car to access it. Residents of the main areas of search identified at Westergate are at least 2 miles and more from the station, opposite which the main shopping area lies. The Evaluation Matrix considered them to be quite distant from existing centres, confirming the distance of Barnham from Westergate to be 2 miles, the nearest town centre being Bognor at 3.75 miles away and only realistically accessible by car. A By-pass would make little difference to the amount of time taken by residents to access here and in any case the aim is meant to be to reduce the need to travel. Chichester is even further away - around 6 miles.

### **Leisure and other facilities**

As highlighted above, there are no real cultural or leisure outlets within the WEB villages apart from voluntary organisations and sports clubs. Residents have to rely on the mobile library service. Fontwell racecourse is the nearest conference facility and whilst race days do provide entertainment, it is over a mile from the Lion War Memorial in Eastergate and further to other village centres. Young people wishing to visit the cinema or other form of entertainment have to travel to Bognor or Chichester, either through the good offices of willing parents or by bus/train. Quite apart from anything else this considerably adds to the cost of the activity. Not surprisingly the previous conclusion was that most people would have to travel to other major centres for their entertainment and given that many both worked and went to school in Chichester, this is where their social ties would be and so for preference this would be their destination. Thus it would not even benefit Bognor (or Littlehampton) that they needed to travel elsewhere.

Whilst sporting facilities are generally good within the WEB villages, one sector of the community has largely been ignored in the Core Strategy, namely horse riders. There are very few bridleways south of the A27 and most of the surface crossing points on that road are now too dangerous to use owing to the volume of traffic. Thanks to the foresight of former MP Michael Marshall, there is an equestrian underpass at Fontwell but riders still need to travel along the local road network to access it. The increase in traffic on even minor roads in recent years has greatly added to the risks involved in doing so and many wealthier riders choose instead to take their animals north of the A27 by horsebox. This is not an option for the less affluent or those who cannot drive. Riding and horsecare is an activity that can be indulged in by all sectors of the community, both adults and children, and is particularly enjoyed by those with physical or learning difficulties. The therapeutic benefits are widely acknowledged both physical and mental. The equestrian sector is also an important contributor to the local rural economy. All of the options will result in an increase in the number of cars using the area but Option 3 in particular will exacerbate the problems to the equine community. Measures to increase public off the road riding opportunities and address safety issues need to be factored into any "Masterplan" cost projections.

## **Healthcare**

The Croft Medical centre in Eastergate is currently very overworked and there is no capacity to accept new patients. They serve a very wide area, including the east side of neighbouring Chichester District and are currently looking to expand on their present site to meet demand. Barnham has no dedicated GP surgery since the closure of the old one some years ago. Since that time many of their residents have had to travel to Yapton for their medical needs. Those without their own transport rely on the kindness of local volunteers or spend an entire morning using the bus service to attend a 10 minute appointment. Barnham already badly needs its own medical centre. The only NHS dentist is in Walberton and is also fully subscribed.

Therefore the current GP services are already inadequate for the existing population let alone a new influx of 5,000+, many of whom might well need regular care. Based on the figures for the Eco Town, a development of 2500 homes would need primary and community care services equating to 3-4 GPs plus staff and community nurses. The Evaluation Matrix confirms that a new health facility would be required at Westergate if the majority of the development was in this location as there is no spare capacity in the area and that if the an equal amount was placed nearer to central Barnham then the facility would need to be large enough to compensate for the existing shortages of provision.

Obviously the effect on secondary care would be the same wherever the development but this would lie further from Bognor War Memorial Hospital than many new residents would be accustomed to.

## **Emergency Services**

In the Evaluation Matrix it was stated that Westergate was regarded as “one of the least accessible areas for police with high response times.” Residents can confirm this as it would appear that officers frequently come from as far as Littlehampton or Chichester in response to emergency calls. The same comment applied to Eastergate/Barnham. Likewise it was not considered a good area in terms of ambulance response times. It was suggested that if the development for 1500 homes went ahead it should be considered whether a responder unit should be placed in the area. With both these services it was thought that the additional homes would create traffic issues that would make response times even worse. No information was given about fire services but the comments in relation to the Eco Town with regard to the provision of sprinkler systems in homes should be noted and the fact that the developers should allow 1.5% of the cost of the new build to allow for this.

## **General Conclusion**

The Evaluation Matrix concluded that the: “Scale of the development would enable enhancement of provision of some local facilities but this would not really overcome the deficiencies of the location,” and that ““New housing would have limited access to many services and facilities, including employment, except where provided as part of development itself.”

At the time of the Structure Plan EiP the following comments were recorded:

“Consider that local schools, doctors surgeries, hospitals and police coverage is already at full capacity.”  
Mrs Christina Freeman, West Sussex County Council.

“Proposal would result in a domintory settlement, which is contrary to government advice. (PPG.paragraph 72)” George Wimpey UK Ltd

We have already mentioned the numerous references to the lack of facilities available in the villages used by Arun District Council to defend against the Eco Town.

Only Bognor CiViC, their supporters and allied organisations have ever suggested that a major development in our villages could be supported by the present facilities. How on earth then do EDAW concur with their view rather than all other previous evaluations?

**EVEN A DEVELOPMENT OF 500 HOMES WOULD NEED A DEGREE OF INFRASTRUCTURE INVESTMENT. A MAJOR STRATEGIC DEVELOPMENT IN THE WEB VILLAGES OF 1,000, 1,500 OR 2000+ HOMES COULD NOT TAKE PLACE WITHOUT SIGNIFICANT INVESTMENT IN COMMUNITY INFRASTRUCTURE AND THIS WOULD RISE PROPORTIONATELY TO THE NUMBER OF HOUSES PROJECTED. FUNDING WOULD NOT JUST HAVE TO BE ONE OFF INVESTMENT IN BUILDINGS BUT ALSO ONGOING SUPPORT OF PERSONNEL IN CONNECTION WITH THEIR OPERATION AND TO SERVE THE SOCIAL AND WELFARE NEEDS OF THE RESIDENTS. THE EVALUATION OF THE SUITABILITY AND VIABILITY OF OPTION 3 AS A LOCATION BY EDAW DOES NOT TAKE ACCOUNT ON THESE FACTORS AND IS THUS CRITICALLY FLAWED.**

## **EMPLOYMENT**

As with the rest of the District, the majority of employment opportunities in the WEB area are connected with tourism, the caring professions or land based. There are also teaching and related support posts at the local schools and adult education centre. Many jobs are either part-time or seasonal, with relatively low rates of pay.

In Arun's Evaluation Matrix of 2007 Westergate's employment availability is described as 'poor' with only 448 jobs, Eastergate the same with only 142 jobs and Barnham 'limited' with 797 jobs. The combined assessment places them at the lower end of 'fair' based on a total of 1387, although the actual assessment in the report is "very limited".

The compares unfavourably with the other end of the 5 Villages where even though each of the individual villages of Yapton, Ford and Climping score only 'limited' on the scale, the combined total of 2624, nearly double that of WEB, puts them in the category of 'good'. Clearly it is a nonsense to put all the housing at one end of the 5 Villages when the majority of job opportunities are at the other end, particularly when employers have stated that more of their workers would like to live nearer to their businesses.

Even more absurd is the suggestion in the EDAW sustainability commentary for Option 3 that "there is potential for the site at Oldlands Farm to deliver some employment opportunities". The site mentioned is in northern Bognor. How is this meant to generate employment opportunities specific to an area of 2,500 homes located anything between 2.5 and 5 miles away, with no regular direct public transport link? One might just as well say that employment opportunities exist in Tangmere or for that matter Chichester itself.

It would seem that EDAW have been consulting the guide to the merits of the WEB location that has been constantly promoted by Bognor CiViC and other related organisations ever since the idea of this location was first mooted back in 2002. Of course their interest is entirely selfish as they want a By-pass at Westergate and a development of this size would be needed to fund it. However, they don't want the possibility of any potential employment sites in the WEB area drawing investment away from Bognor. Hence the assertion that residents will be able to speed down their new super highway into Bognor in order to meet their employment needs.

This was first promulgated in a written submission by CiViC to the Structure Plan EiP, in which they also stated that the development should be “largely residential in order to finance a bridge over the railway, a new section of road by-passing the village of Westergate, school extensions if necessary and the construction of cycleways to schools.” At the time of the original Preferred Options document in August 2007 further propaganda was being circulated around District Councillors. This encouraged them to oppose the recommendation to reject our location, claiming the need to regenerate Bognor and the alleged imperative of the Westergate by-pass in achieving this aim. It stated once again that the residents would be “closer to Bognor’s industrial and out of town retail area than, for example, Rose Green, Aldwick, Pagham and Middleton, which are properly regarded as suburbs of Bognor”. It conveniently overlooked the fact that there is much better public transport connectivity to these suburbs and in any case it would be much better to locate employment in the actual area of the development.

I would also point out that many critical references were made in their document to a report that was not yet in the public domain - namely the Strategic Development Locations Evaluation Matrix. It is noticeable that in this document, that VAG only first had sight of at the time of the Eco Town EiP, the author states that there are:

“Concerns over distance and relatively poor access from main workforce in Bognor Regis and Littlehampton. Also likely to encourage outcommuting, mainly to Chichester. Development generally likely to have limited impact on regeneration of coastal towns and might draw investment/employment away.”

This comment applied to both an evaluation of West of Westergate for 1500 homes and Eastergate/Barnham for the same number. Therefore at the time of August 2007 the Council officer or officers responsible for this document seemed to concur with our views on the matter. There was no way we could have influenced this report since we did not even know of its existence, nor were we being actively consulted by the District Council on this matter.

It is acknowledged that other specialist reports have been produced on the subject of employment which we have not yet had the opportunity to study in detail. However, nothing can change the basic facts that were highlighted by the author of the original Evaluation Matrix. With or without a by-pass, placing such a large development in the WEB location must be accompanied not just by employment space but active promotion and encouragement of employers to establish themselves in the immediate area if it were to achieve any semblance of sustainability. If this were successful then necessarily it would draw potential investors away from its nearest rival, namely Bognor. If it were not successful then the majority of residents would either be left unemployed or have to travel considerable distances, mostly by private car in order to reach their place of work.

EDAW’s opinion is that the latter would be the case as they state that there is “limited potential for attracting inward investment.” On balance this is also the conclusion that was reached by officers of the Council in 2007, that this would become a largely dormitory settlement.

So much for the aim of SO3: Strengthen Arun’s economic base and providing local job opportunities, and SO5: “Reducing the need to travel and promote sustainable forms of transport”.

## **TRANSPORT**

### **SO5 - Reducing the need to travel and promoting sustainable forms of transport.**

We are pleased to note that EDAW confirms the earlier 2007 sustainability appraisal that public transport is very poor at Westergate, poor at Eastergate and only fair at Barnham in spite of the presence of the railway station. This would seem to contradict the latest Core Options document that seems to regard the presence of the railway station as a positive factor with respect to all three villages, not just Barnham.

The rail service from Barnham is excellent if one can only access it. If one lives outside of the village and wishes to use the service after around 7 a.m. in the morning, then parking is virtually impossible to obtain close to the station and the situation becomes progressively worse as the day advances. It is no joke trying to walk from either Eastergate or Westergate during the depths of winter. Cycling is not much better and there are limited places for bicycles when you get there.

The 66 bus service does not commence operations early enough in the morning to be of use to distant commuters and not regular enough to be relied on by anyone else during the day. It was stated at the Eco Town EiP by Stagecoach that it was their considered opinion that a dedicated bus shuttle service would not be viable for a development of 5000 homes, despite the centralised nature of the population and the fact that in a new development certain features could be built in from the start, such as a roll on, roll off monorail type arrangement. It is highly unlikely therefore that they would consider running a dedicated service for a much more widely dispersed population in relation to the Barnham station, even though the total population, both old and new residents, would be about the same as for the Eco Town. Nor is it likely that they would increase the regularity of the 66 bus service to a level that would make it attractive as an alternative to the private car for those who had the choice, who of course would comprise the majority of the new residents.

It should also be noted that EDAW repeat the error that was contained in the earlier 2007 report concerning the access to public transport in Yapton. Only the route 66 is taken into account that links into Barnham, not the 700 bus that runs right through the centre of the village. ADC's own map in the Core Options identifies Yapton as lying on a key transport corridor, yet in spite of the fact that their attention has been drawn to this discrepancy, it would appear that this information was not passed on by the officers of the Council to EDAW so they could update their report. This has a bearing on the appraisal for Option 2 because it is concluded that the development would significantly "improve the current public transport provision", when in fact, outside of the proposed provision of the intersite shuttle service and relocating the station, it would not, since Yapton, Horsemere Green and Climping already have access to a regular bus service that connects quickly to Bognor or Littlehampton and Ford already has a railway station.

It should also be pointed out that plans promoted at the WSCC Structure Plan EiP included the provision of a railway station at Woodgate. The Inspector was led to believe this was a viable proposition despite the fact that Southern Railways, a chief operator on the line, had indicated they would oppose the introduction of any new railway stations, though they would not object in principle to the relocation of old ones. At the recent mobile unit presentation at Aldingbourne, a member of the landowner consortium on the west side of the village was suggesting to residents that a railway station at Woodgate was still a real possibility in conjunction with Option 3. The prospect of such an eventuality was viewed with favour by some residents. The fact that Arun have refused to divulge what has previously been put forward by this consortium in respect of this area and have maintained recently that there is nothing currently being considered has meant that local people have not been properly informed on the matter.

## **SO6: Creating vibrant, attractive, safe and accessible town and village centres.**

With regard to traffic flows, EDAW state that their report is based on the Strategic Transport Study of 2007 which communities have not previously had the opportunity to comment on apart from in connection with the Eco town EiP. There are some important points to emphasise with regard to this point as VAG already had concerns over the Transport Study's conclusions and thus the comments in EDAW's report.

They state there are no capacity issues with regard to the WEB location except with regard to the B2233/A27 junction, which already exist. They also state that congestion on the A29 between Eastergate and Westergate already exists and will remain similar with development. Surely if they already exist at these points then they will be made worse by a doubling of the population in this area? There is also no mention of the congestion on the B2233 between Barnham and Eastergate.

They state that improvements will be made to the A29 at Barnham!!!! There is no A29 at Barnham and it is hard to see how improvements could be made to the B2233 at this point.

There is no mention of the likely impact on the A29 at Fontwell. Nor is there any acknowledgement that feeding into the A27 at this point will increase congestion at Arundel and from Crockerhill possibly the northern end of the Chichester By-pass as well.

There is no understanding of the nature of motorists who prefer to rat run rather than wait in a queue and so the alternative to increased congestion at Fontwell is the distinct possibility that the B2233 through the 5 Villages Area will become more congested eastbound as motorists seek to transfer to and from the A259 eastbound to avoid the hold ups at Fontwell and Crossbush. Residents already experience this phenomena westbound as drivers from Littlehampton cut through the 5 Villages to avoid the delays on the A259 through Bognor to Chichester. For the sake of current and future residents it is hoped that Arun do not allow any further large scale development proposals to be approved west of the River Arun let alone commenced until the current ones are completed and thus the Bognor Relief Road as well.

Thus we come to one of the main areas of contention over the last 7 years - the proposal for a Westergate By-pass. During the last year we have repeatedly asked if this still forms part of the development proposal for our area and have been met with deliberate stonewalling and ambiguity on the subject. The Chief Executive assures us that there is not a current proposal under consideration with respect to Option 3. By contrast the Councillor for Bersted who is on the LDF Committee extols the virtues of Option 3 on the basis that it would "provide the much needed northern access into Bognor". So which is true?

If a By-pass is not an integral part of Option 3 proposals then how do Arun District Council propose fulfilling the statement that development in the WEB location will be accompanied by "improved transport links". Is this merely some wishful thinking with regard to our bus service which to be honest would not have to improve much to be better than it currently is? If that is the case why was a representative of the landowner consortium at the mobile unit encouraging residents to vote in favour of Option 3 because that way they would get a by-pass which would remove the traffic from their village? In addition he minimised the number of houses that would actually have to be located in the village in order to achieve this. He also stated that a roundabout would be provided at Crockerhill. Naturally his assertions were challenged on the day but nevertheless even if his assertions were factually incorrect on the detail, there are sufficient indicators within other documents to give us cause for concern.

In February 2008 a representative of CiViC told the Bognor Observer that a developer was willing to fund a by-pass and bridge over the railway in return for building 2000 homes.

The 2007 Evaluation Matrix states quite clearly under deliverability that West of Westergate was being considered on the basis of “A major house builder actively promoting development in this location” and that “Development would require the A29 Westergate By-pass, including railway bridge, to provide access to development.” It also goes on to say that the developer had taken this latter requirement into account when assessing the viability of the proposal but it was not clear whether they had also taken into account the additional improvements that would be required to the A29 and A27 junction(s).

EDAW make reference to improvements to the A29. They also regard the only capacity issue to exist at Crockerhill and congestion between Eastergate and Westergate will remain the same, suggesting that the by-pass is now intended to terminate on the Nyton Road rather than in the Fontwell Avenue as previously planned.

EDAW’s report is based on information from the 2007 Strategic Transport Study which included the By-pass in its analysis on the effect of the development on the road network. When challenged by the author over its inclusion at the Eco Town EiP (since only roads actually in the network or planned were permitted to be included), the former Chief Planning Officer admitted that this was because the housing development “could not take place without the road.”

The WSCC Structure Plan Inspector stated that this location would not normally meet the requirements of PPS3 and there would have to be special justification for housing to be located here. This had been supplied by the landowners’ representative in the form of a By-pass that it was alleged would assist the regeneration of Bognor. No doubt the Inspector was influenced by the supporting written submission from Bognor CiViC that assured him this would be the case.

The Plans submitted by the landowner consortium’s representative to the WSCC Structure Plan EiP and the later map issued by Bognor Vision Group to the Bognor Observer in 2005 clearly show access from the development would be westwards onto the by-pass.

The area of search shown on the Core Options map clearly follows the 2005 Map’s line of the proposed by-pass down the western side of the village, which had altered from the earlier version owing to the fact the original sweep of the road would have taken it through the landfill site. The search area also terminates in the south at precisely the same point that was indicated that development would terminate in the earlier plans. However, the land put forward for consideration under the SHLAA continues on to the A29 following exactly the line of the road

All the land put forward to the SHLAA on the western side of the village corresponds to the map showing landowner holdings that was submitted to the West Sussex Structure Plan EiP.

When a Freedom of Information Act request was made to Arun District Council concerning the plans that had been submitted regarding this proposed development in 2007, it was denied on the pretext of commercial confidentiality. This would suggest that the plans are still active and under consideration or there would not be an issue over their release, since WSCC saw no problem in releasing similar documentation from the earlier period.

From all the above we must conclude that the by-pass is still very much under active consideration and its continued promotion by Bognor Vision Group, Bognor CiViC, Bognor Chamber of Commerce et al is the real reason for the inclusion of Option 3 in the Core Options, when Arun’s planning officers had previously rejected any scenario involving Westergate in combination with either Eastergate/Barnham or either of the urban extensions as being **unsustainable**.

A separate critique follows detailing why the By-pass will benefit neither the 5 Villages, nor Bognor itself. We would also point out that with regard to the possibility of it assisting the regeneration of Bognor, the Evaluations Matrix only concluded that it *could*, not that it positively *would* make a difference. We would also draw attention to the following expert testimony at the time of the WSCC Structure Plan following the publication of the Deposit Draft.

“Other than the A27/A285, no A27 junctions could cope with the additional traffic. Would object to significant traffic increases at Crockerhill and similar junctions.” (Highways Agency)

“Highway accessibility to the primary network is particularly poor. Providing links to the A27 and to Bognor Regis would be expensive and environmentally disruptive.” (Laing Homes Ltd)

On this latter issue concern has already been expressed to the LDF Committee that attempting to fund a by-pass would direct funds away from other more beneficial community facilities should Option 3 or the WEB element of it be selected as the preferred course of action. Suffice to say that if it is not the intention to link Option 3 to the provision of a by-pass then this matter should have been made clear from the outset of this latest consultation as many people from Bognor will be supporting Option 3 on that basis. Alternatively if a by-pass is inextricably linked to Option 3, this should also have been fully publicised so a proper evaluation including the cost implications could have been made. This failure to acquaint people fully of the facts is contrary to the spirit of community involvement and may well lead to people making ill informed choices about the merits of Option 3. Ultimately this could invalidate the entire consultation process which would be a waste of everyone's time and tax payers money.

We would also point out that the figures that Bognor CiViC originally supplied to the Structure Plan EiP were misleading because they dated from 1999. These did not take account of the construction of the Angmering By-pass and the downgrading of the last stretch of the A29 from Shripney to Fontwell from the strategic road network. Even so, what they do show is that the majority of journeys took place to and from the 5 Villages area, Slindon and Amberley (the latter because at that time it was a stopping place on the fast commuter service and parking in Amberley was easier than in Barnham).

When, as a result of pressure from Bognor Vision Group in 2005 to reverse the decision to remove the A29 from the strategic road network, WSCC Highways & Transport did a reappraisal based on the latest traffic flow data, their Director of Environment & Planning reported that these indicated that there was no justification for its status being changed. This would indicate that in 6 years the amount of traffic had not significantly increased from the 1999 position and furthermore that at that time West Sussex County Council had not felt it would adversely affect Bognor to remove it from the network.

Of course a large scale development at WEB would increase the traffic flow along this stretch of road and this would add to rather than reduce delays. The delays at the level crossing have been greatly exaggerated as during the majority of the day they amount to on average 3-4 minutes with a tail back of no more than a couple of hundred yards maximum in either direction. The main delay occurs south bound in the evening rush hour at a time when every major road and road junction in the District is similarly choked with traffic.

However, as proved this winter, the rail crossing and journey through Westergate is not the real problem. The A29 was closed at Lidsey initially owing to flooding and then through freezing of the surface water that turned it to extremely dangerous black ice. Unlike other incidents of flooding in recent years this closure of the A29 occurred only at Lidsey and is the likely the result of warnings being ignored concerning the affect of the landfill site on the road. This situation will only be exacerbated in the future if large scale housing development takes place to the north of Lidsey area and will not be overcome by the presence of the by-pass because it terminates to the north of the area subject to flooding and since it will cut across one of the principle drainage rifes is also likely to make matters worse.

Another factor that should be considered is that the Strategic Transport Study concluded that the main flow of traffic on the by-pass would be south onto the Bognor Relief Road and thus onto Chichester that way, adding to the pressure on that road. When considering the use of the northwards route it also assumed that traffic would be able to turn right at Crockerhill. Even if the developers were willing to fund a roundabout at this point, have the Highways Agency been consulted on this idea?

If the intention is to improve links into the centre of Bognor it would be cheaper, more effective, less environmentally harmful and more sustainable to negotiate with the train operators to improve the service into Bognor. If the primary intention is to serve out of District commuters to the north then the Bognor Express should be reinstated. If one wishes to encourage administrative headquarters of organisations to relocate to the coast then having the fast track service from Horsham terminate on occasion at Bognor instead of Chichester would be helpful. Apart from when they are trying to rack up the miles on their car for the tax man, most business people prefer to travel by train as the time can be spent working, legally talking on the telephone or simply sleeping. If the intent is to encourage more tourists into Bognor then more special offers that will keep down the cost of fares to families would be beneficial. All these would be in keeping with the aims of SO5 and SO6.

What is not in keeping is linking housing development to the construction of a road that will encourage car use and result in even greater car dependence.

### **WHY THE BY-PASS AT WESTERGATE WILL NOT HELP BOGNOR REGIS OR THE 5 VILLAGES AREA TO IMPROVE ACCESS**

1. Whilst it would remove the delays caused by the level crossing, the new settlement would add to the volume of traffic in this area at peak times, thereby transferring the delays to another location, in particular the A27 junctions.
2. Apart from peak hours when there are considerable traffic delays everywhere in the area, in the majority of cases far worse than those at the Woodgate crossing, the average delay at the level crossing gate is 3 minutes. Throughout the day the flow of traffic along the A27 is such that it can take even longer to negotiate the junction with the A29 at Fontwell. Furthermore, as the Highways Agency have acknowledged, the level crossing actually helps in controlling the flow of traffic northwards into the junction, allowing backlog to clear before the next group arrives. If this control was removed, there would be no break in the traffic arriving at the Fontwell junction and consequently a much greater queue would build up in this location, adding to the delay at this point.
3. There would also be the burden of the additional traffic generated by the development itself commuting outwards in the morning and homewards in the evening, plus local journeys during the day. There are often considerable delays at the Lion War Memorial from the B2233 Barnham direction in the morning and from the A29 Fontwell direction at night, neither of which have anything to do with the level crossing.
4. Most people living here would not be working in Bognor but out commuting to other areas, such as Chichester, Worthing, Portsmouth and Brighton, adding to the traffic on the A27.
5. There is no station at Woodgate and the car park at Barnham and surrounding roads are already full of parked cars. There is currently no bus route through the area west of Westergate and the bus route through the main village is not frequent enough to make it viable for commuter travel or for any travel where deadlines need to be kept. Thus the majority of residents will be relying on their private cars for transport.
6. The section from Lidsey to the Nyton Road contains 4 roundabouts, including those junctions. These will cause delays by their very nature, but the middle two are necessary to allow access for the traffic from the new development areas. Funding constraints make dual-carriageway junctions with grade separation unlikely.

7. As the railway crossing would be closed off there is a risk that traffic will use the by-pass to travel south to hook up with the Bognor Relief Road/A259, adding to the volume of traffic there, rather than north to the A27, particularly if the hold-ups experienced on the northern route are perceived to be greater than those on the southern route.
8. If the railway crossing is not closed off then the village will not benefit from the by-pass as it will be open to use as a “rat run” to avoid congestion on the by-pass. Arguments relating to improved train times and safety will also no longer apply.
9. The majority of traffic using the A29 south of the A27 to access Bognor at peak times, do so travelling northwards in the morning and southwards in the evening, in other words residents from Bognor out commuting to other areas. Cutting down the delays caused to these people would not appear to benefit Bognor businesses but their rivals in other locations.
10. The A29 north of the A27 is not suitable for heavy commercial traffic. There are speed restrictions at Slindon Common, Watersfield, Coldharbour, Pulborough and Adversane. The junction with the A283 in Pulborough is extremely difficult to negotiate for large articulated vehicles, causing the blockage of both carriageways during the attempt. Lorries slow to a crawl on the ascent of Bury Hill and would be well advised to take the descent slowly to avoid burnt out brakes. Thus the chief reason for having the by-pass, to allow a better northerly access route to encourage business investment, is rendered null and void.
11. Cars and light commercial vehicles currently have the option of using the A29 northwards to avoid congestion on the A27 at Arundel and A259 past Littlehampton. Yet it would seem that either they choose not to use it for the reasons given above or that there is simply not that volume of traffic travelling northwards. Essentially the by-pass is just a glorified “rat run” to the A27 and the 5 Villages area. Once there the traffic simply adds to the congestion on that stretch of the A27 and on the B2233.
12. One of the principle contributors to the volume of traffic at peak times is the school run. The local schools in Westergate, Eastergate and Barnham will not be able to accommodate all the new arrivals, leading to more traffic as parents drive their children to the nearest available school that they wish them to attend.
13. Commercial space included as part of a major strategic development will compete with Bognor for potential employers. Since it will be located nearer to the A27 than Bognor, this location may well prove more attractive to them, rendering the original purpose of the By-pass null and void.

These are only some of the vary many arguements against a By-pass but the chief one lies in the fact that it runs counter to Arun District Council’s Core Strategy Vision Objective SO5: Reducing the need to travel and promoting sustainable forms of transport; since the new residents will be heavily reliant on car transport and by its very nature a By-pass encourages car use.

## LANDSCAPE

Your attention is drawn to our previous detailed critique on the subject of the landscape appraisal undertaken by Hankinson Duckett Associates on behalf of Arun District Council. This was submitted to the LDF Committee via the Chief Executive on the 20<sup>th</sup> August 2008 and was passed to the consultants for their reaction but to date we have not been notified of their response. The last time this was queried we were informed the consultants had not yet replied. They have now had over 7 months to do so and in view of the importance of this issue, would request a reply is urgently sought on the matter.

Since the original document was somewhat lengthy, the findings have been abridged for the purpose of this submission but nevertheless we ask that the original be included as an official submission document in response to the consultation. The original also concentrated its detailed examination on the western side of the village of Westergate as it was felt at the time that this was the area most at risk from development. However, it did point out that the comments with respect to Westergate might well apply to the rest of the District's inland villages. In view of the limited time that has been available to extend the study, the majority of the comments that follow are still confined to the settlements in Aldingbourne parish and the immediate neighbouring village of Eastergate. This does not imply that we consider the rest of the 5 Villages area or Angmering any less important, merely that the author does not possess the same degree of knowledge of those areas.

The Hankinson Duckett report stated that "Land uses around Westergate, north of Eastergate and lying to the east of Barnham are a mosaic of horticulture: both glasshouses and nurseries, paddocks, pasture and small holdings associated with *low density, linear, post war development*. Additionally under the Landscape Character Assessment section for Westergate Western Fringe, Westergate Eastern Fringe and Fontwell/Eastergate Mosaic "Contribution to distinctive settlement setting", it is stated as "***Not distinctive, mixed urban fringe uses,***" resulting in a score of negligible.

Once again we would ask you to examine the attached documents, including extracts from the Aldingbourne Tithing Record Map of 1846, the Ordnance Survey Map of the area first drawn up in 1874 with boundaries revised in 1949 and the aerial photographs taken by the RAF immediately after the 2<sup>nd</sup> World War, and then compare them with a modern equivalent. You will see that the majority of the area immediately around the villages has changed little in the last 163 years in terms of field division and land use which is still predominately agriculture or horticulture. Whilst many of the orchards in the Ordnance Map have since been removed, the field patterns remain the same and in many cases have actually reverted to their earlier Tithing Record use. On the south side of Eastergate the area around Manor Farm is long established and the lush cattle pasture that lies between this Conservation area and Westergate is part of the historic land use of both villages.

The main exceptions are the arable fields beyond the rife on the western side of Westergate, west of Northfields Lane and south of Eastergate/Barnham where fields have been combined and hedges fragmented as a result of 20<sup>th</sup> century agricultural practice, not urbanisation. Additionally the area to the north of the B2233 in Eastergate parish that shows on the Ordnance map and photograph as a patchwork of small arable fields and orchards, more recently has largely been allowed to lie fallow and restricted to sheep grazing during the last 20 years at least that the author has resided in the area. As a consequence it still contributes to the distinctive setting of the north side of the village of Eastergate. It has also become so important to biodiversity in the area that it is also recommended in the EDAW Habitat Survey as both a District and a Local SNCI.

All these areas are now under threat from housing development under Option 3, the Westergate Western Fringe and north of both villages in particular because they have been assessed as Medium/High and Medium respectively for their land capacity.

Additionally we would redraw your attention to the comments of the Planning Inspectorate in 2005 about the area of Northfields Lane immediately to north of the area of search for development, but still part of the Fontwell-Eastergate Mosaic, which was described as “plainly a rural area in policy terms” thus correcting an earlier incorrect assessment of the area as semi-urban owing to the Inspector at that time not appreciating the degree to which unauthorised development had affected its character. There does seem to be an unfortunate tendency for planning experts not familiar with the history of our area to assume that because the fields adjacent to the villages are small scale with a variety of uses that this indicates a degree of urbanisation whereas in fact they reflect a very ancient rural landscape and character. There is also the problem of speculative landowners allowing land to lie fallow in the hope of influencing planning permission, which has backfired with wonderful irony in north Eastergate.

If the conclusions drawn by Hankinson Duckett about the importance of the adjacent fields to the setting of these two villages is accepted as erroneous and the Landscape Character revised accordingly then all these areas should score the same as Norton Upper Coastal Plain for “Distinctive Settlement Setting” which has the comment that Aldingbourne and Norton have retained their “traditional” setting and avoided post-war suburbanisation. Furthermore the Fontwell-Eastergate Mosaic should now score even more highly for “Inherent Landscape Quality” as EDAW have identified no less than three areas within it of high ecological value that have been recommended for designation as SNCIs.

The effect of this would likely change the overall rating of Westergate Western Fringe to Medium and Westergate Eastern Fringe and Fontwell-Eastergate Mosaic to Low. Whilst this in itself would not preclude development, since the Park Farm and Norton Upper Coastal Plains are both categorised as Low and yet included in the area of search, as is the area around Angmering which is similarly rated either Low/Medium or Low, nevertheless we still feel this is an important issue and should be addressed in order to challenge any assumptions that are being drawn by interested parties as to the suitability of these character areas for development.

Despite our criticism of the Hankinson Duckett report concerning the character of our area, we would point out that even with a rating of Medium/High or Medium they considered that it was only suitable for small scale strategic development. Additionally we would draw attention to their comments about the effectiveness of the Eastergate/Barnham Local Gap in preventing coalescence between settlements despite the presence of the glasshouses. Whilst the gap is limited both in visual and physical separation between the settlements, nevertheless a gap does exist. In fact this division between the villages is far more evident from aerial views than on the ground owing to the presence of the greenhouses on one side and the high board security fence on the other.

Although Central Government now appears to be favouring the removal of strategic gaps this is not sufficient reason to ignore one that currently exists and as a consequence regard Eastergate as a suburb of Barnham. They are separate and as a result distinctly different in character. Eastergate is still closely related to its historical origins and very nuclear in the main part of its settlement. Barnham is far more spread out and detached from its original location. Nevertheless on the RAF photograph it can clearly be seen that the Downview Road development was already in existence at that time and thus before the introduction of post war planning controls. These have prevented any further creep northwestwards by Barnham and the actions of previous planning officers should be respected. On Ordnance Maps the area from the station westwards is described as West Barnham and of course actually falls within the parish of Eastergate. True Barnham lies east of the railway bridge on the map. If Barnham is not to become a reality, further spread of the settlement beyond its westernmost boundary should be avoided.

As for Eastergate and Westergate, if the new school and housing estate that was constructed to fund it did not exist, there would still be clear division between the settlements. Since West Sussex County Council and Arun District Council authorised this development there is no justification for ADC using this to suggest that the villages are now suburbanised, particularly since the school does not just serve these communities but the entire 5 Villages area and beyond. Old maps and photographs show there has always been a small ribbon of development along the road between the two and yet up until now they have always been regarded as two distinctive settlements. The requirement to meet Government Housing Targets is not a sufficiently good reason to ignore this historic relationship between the two villages that has always seen them in close proximity to one another, yet with separate identities.

## **HISTORIC BUILT ENVIRONMENT**

Arun District Council are well aware of the number of listed buildings in our area and the presence of the various conservation areas. EDAW's sustainability report confirms our view that Option 3 would "significantly change the character of the existing settlements". It also states that "the current sites are quite large exposed sites and will produce a much more urban character to the area". Whilst this comment could apply to certain areas closer to Barnham station, in particular eastwards and south of the B2233 in the area of St Philip Howard School, the suspicion remains that what is being referred to is the area that has previously been targeted to the west of Westergate beyond the rife that is clearly visible both to travellers leaving the settlement, to the residents of Aldingbourne and Norton villages and from as far afield as the South Downs, in particular Halnaker Hill, a popular walking destination where people can stand and look back across the coastal plain. Currently the A27 is concealed from view and if one looks southwards the area of Aldingbourne Parish between Westergate and Tangmere is an entirely rural vista of open fields, hedges and trees, with the odd building and an occasional vehicle passing along the B2233. To achieve the level of housing required in Option 3 would involve wholesale destruction of this landscape.

However, it is not just a matter of the visual appeal of agricultural fields and natural divisions between them. In their analysis of the impact of development on the historic environment, EDAW only mention the Eastergate conservation area and the views to Eastergate from the railway. Does Westergate not exist? Why is there no mention of the effect on the listed buildings in Aldingbourne Parish, in particular Nyton Lodge, the various dwellings around Nyton House and the Church Farm area which in turn links into the Parish Church conservation area? The rife which joins Nyton Spinney to the historic Mill Pond is also an important green corridor whilst the entire area including Park Farm was once part of the medieval Bishop's Palace estate, the earthwork remains of which are located at Tote Copse just within the District boundary on the other side of the pond. Such is the historic importance of this whole area that our former MP, Howard Flight, considered "there should be a special protection in a radius of one mile from St Mary's Church and the conservation area in Norton Lane." This would cover much of the area to the west of the village of Westergate down almost as far as the railway, including much of Hook Lane. Our current MP, Nick Herbert, has also acknowledged the age and attractiveness of this setting.

Whilst currently the area has no official environmental designations EDAW's Habitat Survey recommends that 3 areas within the area of search for Option 3 should be made District or Local SNCIs and another is less than a mile from its northernmost limit. This confirms the importance of our area for biodiversity and nature conservation. If a smaller sized development at northern Littlehampton could impact on Climping Beach, which is 3 miles away, what would the proposal for WEB do to the natural environment of our area and these sites in particular? EDAW's sustainability survey confirms that development would "interrupt the existing field pattern and the established networks would be lost". In fact the potential impact would be devastating on the landscape and historic built environment.

Thus Option 3 would be in contradiction of Strategic Objective SO4.

## BIODIVERSITY

1. The proposed building of 2,500 homes in the Westergate, Eastergate and Barnham area under Option 3 and associated transport infrastructure such as a Westergate by-pass, would potentially have a serious adverse effect on the biodiversity of this rural area.

The comments made here can only be preliminary because the short LDF consultation period has not allowed for a full study of the area to be made. Furthermore, Arun's Phase 1 Habitat Study, compiled by EDAW and dated March 2009, was only posted on ADC's website ten days before the deadline for the Options for Growth consultation. This document contains important information some of which it has not been possible to download on a domestic PC, let alone integrate with this response at such a late stage, but which VAG will wish to draw upon if Option 3 were to be progressed in whole or part by Arun. In that event, Arun would need to commission and make available to the public a full biodiversity study of the whole WEB area by an independent expert organisation such as the Sussex Wildlife Trust well **before** Examination in Public. Trees, hedgerows, grassland, ditches, bird population, plant, reptile and insect life would need to be surveyed over a twelve month period for the whole of the three parishes.

The Habitat Study acknowledges that it was carried out in October 2008, which was late in the growing season, and against a short deadline, which means that it is limited to presenting a picture of broad habitat types only. It also explains that Arun's Biodiversity Action Plan (2000) is currently evolving, and that the draft Core Strategy (clause 6.107) acknowledges there may be sites or areas of biodiversity importance which have not been identified or designated.

The Study also explains that Planning Policy Statement 1 requires, for example, development plan policies to take account of environmental issues such as the protection of the wider countryside and impact of development on landscape quality, conservation and enhancement of wildlife and habitats. Regional Planning Guidance 9 for the South East, policy ER5, sets out the regional planning framework for biodiversity. Both these documents set the context and policy framework against which Option 3 has to be assessed and which VAG believes show that Option 3 is not compatible with these and other policies designed to protect wildlife and the countryside.

2. The Villages of Westergate, Eastergate and Barnham are surrounded by a mosaic of farmland. The historic farming pattern was of small fields, comprising in the Westergate area small dairy and mixed farms. (Note that the Landscape Study contains an error here, as it assumes the small field size is the result of development, whereas the post war aerial photo enclosed (1946) and Bertha Watson's book *Down Your Way* appear to confirm that small fields are the traditional pattern). This is a point which may require further study in order to ensure that traditional patterns are not lost.

The area is also low lying. The resultant network of small copses, hedgerows, meadows, ponds and ditches, together with the Aldingbourne Rife, provide habitat for a wide variety of wildlife (flora, birds, reptiles, fauna etc.). Hedgerows and ditches provide important connecting "wildlife corridors" for birds, insects, reptiles and mammals. It is now widely recognised that maintaining these features is an essential part of protecting wildlife diversity: "providing conduits through which wildlife may move, and protecting soil, livestock and property against extreme weather events" (ref: Barry Gardiner, Minister for Biodiversity, Landscape and Rural Affairs, Hedgerow Survey Handbook, DEFRA, 2007). The Phase 1 Habitat Study makes the point that species will need to be able to move to respond to the impacts of climate change and will therefore need robust and well connected wildlife habitats. The bee population, for example, is now fragile but essential for the horticultural industry as well as pollination of wild plants. The bee population depends in farmed arable areas on hedgerows, green corridors and, in the case of ground nesting species, small less intensively managed meadows of which there are a number in the WEB area.

3. The footpaths around the village edge are well used and provide local children as well as adults with an appreciation of the countryside and wildlife. There is abundant birdsong, wild plants (which have not been surveyed but include, for example, white violets and broomrape), sightings of small mammals such as moles, stoat, weasel, harvest mouse, reptiles such as great crested newt, common newt and insects, including field cricket and stag beetle, as well as larger mammals such as foxes, rabbit, badger and deer. A herd of deer based in the Mount Pleasant area is also seen in the Nyton area and roams south to Park Farm, whose territory would be affected by development.

4. Bird species commonly seen and heard include the following, some of which are included in the list for local Species Action Plans given in the Phase 1 habitat survey: jays, magpies, green spotted woodpecker, skylark, swift, song thrush, nuthatch, long tailed tits, buzzard, moorhen, golden pheasant, grey partridge, barn owl and tawny owl and garden birds. 46 species have been recorded at Nyton Spinney alone.

5. There are also a variety of less common and protected species in the area. Protected Species recorded in the area include:

- Pipistrelle and Soprano Pipistrelle bats
- Stag Beetle
- Slow Worm
- Grass snake
- Common Toad
- Common Frog
- Great Crested Newt

There are also reported sightings of Water Vole and Dormouse. However, these are unsubstantiated, but highlight the need for further investigation.

6. Based on the existence of known recorded species as above, the area would appear to be generally under recorded, although some records have been submitted to the Sussex Biodiversity Records Centre. This means that any development could inadvertently wipe out less common or protected species, as well as common ones. It is therefore **essential** that before any further development proposals are considered for the villages that a full biodiversity survey of the area is undertaken.

7. The Phase 1 Habitat study makes the point that wildlife habitat needs not just identification and protection but careful management and enhancement. It is therefore essential that, whichever Option (or combination of options) is chosen, steps are taken to identify key sites and put in place appropriate management regimes if the land use does not already provide for this.

8. Some of the oldest features, which are recorded on old maps, could potentially be of considerable wildlife interest. Old trees are of particular biological importance. The woodland to the Western side of Northfields Lane, for example, was formerly more dense and subject to protection, but damaged by the then landowner. It provides a valuable wildlife corridor linking woodland recommended for SNIC at Level Mare Lane via the old orchard and meadow behind the southern side of Nyton Road, Nyton Spinney and the Aldingbourne Rife to the central part of Westergate. The meadow between Nyton Spinney and Aldingbourne Community Sports Centre's Playing Field is well used by walkers and children and would benefit from being managed as "green space" for wildlife benefit.

9. A By Pass around Westergate, in particular, would have a potentially devastating effect on the biodiversity of the area. Potential effects include:

breaching wildlife corridors such as the wildlife corridor mentioned in 8 above, hedgerows and ditches on the western side of Westergate in at least four or five locations, leaving isolated wildlife populations (eg in Hook Lane and the Nyton Road area). These would be incompatible with policies outlined in 2 above.

air borne pollution affecting sensitive species such as bees

particulate pollution and run-off, including oil, polluting ditches and the Aldingbourne Rife. Such watercourses would carry pollution to the coast, potentially affecting blue flag beaches.

10. Large scale housing development would inevitably include a considerable proportion of high density housing in order to fund the road improvements, schools and other community facilities to serve such development. High density housing would require ripping out hedgerows, trees and copses, altering watercourses and ditches. Re-planting does not replace the wildlife interest which is lost when such features are removed. Although developers would be required to isolate run-off from development during periods of intense rainfall damage to watercourses may be unavoidable. Furthermore, fly tipping, litter and vandalism are potential threats to biodiversity in the vicinity. Sites identified for the Strategic Housing Land Availability Assessment shown in figure 4 of the Habitat Study include or are enclosed by woodland, meadows, hedgerows and watercourses and would potentially be adversely affected by development. However, some small scale development of the type identified in 11 below might, if sensitively designed, avoid damaging consequences.

11. VAG accepts that each village needs some small scale affordable housing development to meet local needs and some bungalows or sheltered accommodation for elderly people who do not want to move into a nursing home when their health deteriorates. Some small scale developments, eg up to 25 units, may be appropriate in sites which will not compromise the biodiversity of the area, designed so as to protect and enhance wildlife corridors. However, wide margins will need to be provided so as to avoid unintentional damage during development operations by unskilled workers.

## **Soil Quality**

Climate change has potential implications for food production in the UK and abroad, and scientists predict food shortages arising later this century. Furthermore, the need to reduce carbon emissions means further emphasis on the need to reduce “food miles”, which will require the heavily populated south east to grow more of its food within the region. There will also need to be a reduction on reliance on fossil fuels in agricultural production.

These factors mean that it will be essential for development on top quality, Grade One, agricultural land to be avoided. (Regrettably Government guidance to this effect has been withdrawn but it is possible that it could be re-instated as climate change effects become more evident, and it would be prudent to allow for this.) Brownfield sites should have priority for development to reduce the need for agricultural land.

The implication of following this principle is that Option one is the most sustainable solution in relation to soil quality, if Grade 1 sites at Bognor and Angmering are avoided. These Grade 1 sites might be replaced by a modest amount of development on brownfield land, eg at Ford, ie a modified Option one.

## **Footpaths**

As explained above in relation to biodiversity, the WEB area is served by public footpaths into the countryside which are well used. The Habitat Report explains there is a target provision of access to green space, as part of health and wellbeing, within a 15 minute walk of housing. The impact of 2,500 houses in the WEB area would detract significantly from the health and wellbeing of current residents and those in future housing, by making it more difficult to access high quality countryside within the target times, particularly for older people and those with young children. The enjoyment of the remaining countryside around the area would be marred by traffic noise, particularly if a by-pass were built, and poorer air quality.

## **FLOODING, DRAINAGE & SEWAGE**

Since the EDAW report admits that all areas have some degree of flood risk and many of the comments regarding WEB concur with our own research of the matter this commentary will confine itself to local knowledge of the problem on the ground where it contradicts the report or it is felt insufficient data has been supplied.

The area has experienced serious flooding 3 times in the last 15 years, the first during 1994, the second in 2000 and the latest this winter. During the first two instances various roads were submerged and impassible including the A29 both in the Fontwell Avenue just north of Eastergate Lane and at Lidsey. There was additional flooding along the stretch of the A29 between the Lion War Memorial junction and what is now the new school turnoff. Northfields Lane public path was also totally submerged by the flooded drainage rife in almost exactly the same latitudinal position as the flooding in Fontwell Avenue. These were not just recent phenomena as the historic record details similar flooding down the years and almost identical flooding to that at the War Memorial in a photograph taken in 1900.

This situation was acknowledged by the Planning Team in the months prior to the flooding in 2000 when a planning application was turned down for a nursery site now put forward under the SHLAA in northern Westergate. Along with poor access and the objection of using of high grade agricultural land for housing, a major consideration was that the "proposed culverting of the watercourse would adversely effect the local water environment and prejudice the conservation and flood defence value of the watercourse." This rife drains into the Nyton Spinney and from there onwards through the middle of the area targeted with development, across Hook Lane and into the Aldingbourne Rife. This leads one to question that if culverting such a small amount in Northfields Lane would have such a bad effect, what would a large scale strategic development do, together with the associated roads?

The EDAW report acknowledges "There is potential for surface water flooding, through the presurised effects of water coming down off the South Downs" but suggests there are opportunities to install a system where water would be slowly discharged into the water courses. Is it really going to be possible to mitigate the effects of water run off by feeding into the drainage rifes? What effect will this have on the wildlife, particularly the endangered and protected species?

The 2007 Evaluation Matrix states with regard to Westergate that "The impact of run off from development (particularly large scale) would have to be carefully considered". It also acknowledges that drainage systems in the area have been difficult to put in although it does admit they are achievable. As for Barnham/Eastergate it states that "the gradient in the area is difficult for suitable drainage," and "Drainage systems would have a high land take". Ground water is also an issue in the Barnham area as infiltration in wet weather "flows into the waste water system causing flooding".

Despite a massive amount of work on the drainage system in the Barnham area in recent years this is still constantly a problem. During this winter's heavy rains sewage backed up and overflowed into Barnham Primary School in Elm Grove north, causing its closure. A walker on a path across the Eastergate rife on the southern edge of Westergate also encountered what appeared to be sewage in the rife.

There have been several incidents with regard to the sewage system not being able to cope during wet weather over the years. Houses in the village and along the Nyton Road towards Norton on main drainage have experienced sewage bubbling up through their toilets following periods of heavy rain.

On water quality EDAW acknowledge that "There are higher costs to treat water which drains into the Lidsey catchment ...as it is treated to a higher standard." However, earlier they comment that present capacity is unknown. Yet the earlier Matrix states that expansion of the Lidsey waste water works would be required.

Why were EDAW not appraised of the earlier work by the planning department on this and other issues?

There is also concern regarding the affect of the development on areas down stream, particularly considering the predicted effect of the landfill has occurred and the A29 at Lidsey is now more vulnerable to flooding than previously, bearing in mind that it was the only road in the area to have been actually closed off through the bad weather this winter. Whilst it might well be possible to build the houses to minimise the risk of flooding to them and even mitigate the effects in the adjoining village, what will happen to Lidsey, Shripney and Northern Bognor if much of the water absorbant vegetation and soil is replaced by concrete in the WEB area?

This is very much an issue where it is not a case of "every location has problems so we'll treat them as equal for risk" but of telling Central Government that too many houses equals potential disaster.

The Evaluation Matrix suggested that "Assessment of management of surface water run off is required for sites larger than 1ha," and that "Surface water run off would need to maintained at existing levels". That equals an awful lot of water management that has to be considered and will it really be possible to keep to that criteria with a development of 2500 homes even spread over a number of sites?

## **CONCLUSION**

As stated previously, this submission has been limited by the time available to the co-authors and the recognition that it needed to be kept as brief as possible. Nevertheless by now it should have been realised that there are issues of such concern in the proposed level of development in Option 3, this document could not have been any shorter and indeed there is still much left to be said. Suffice to say we feel there is sufficient proof in the foregoing that the future needs and quality of life of both existing and potential residents of Westergate, Eastergate and Barnham have not been sufficiently respected in some of the documents that have been produced or the way in which they have been consulted on these matters of lasting importance for the future of the District. We trust that in future this situation will be redressed and that not only will we be better informed by the officers and representatives of the Council but that common sense and good planning will prevail and that Option 3 or any combination of options that includes a large strategic allocation of this magnitude in the villages of Westergate, Eastergate and Barnham will be comprehensively and conclusively rejected.

Villages Action Group  
31<sup>st</sup> March 2009

## **SOURCES OF INFORMATION**

Arun District Council's background documentation to the LDF published on the website

WSCC Structure Plan - Original Representation Anthony Greenwood for various landowners  
- Statement of Case - Anthony Greenwood for Enplan  
- Statement of Case - Bognor CiViC

WSCC Structure Plan - Summary of responses to public consultation

JDAC Minutes and supporting papers - July 2005

Bognor Observer Article "On Road to the Future" - April 2005

ADC Context Statement: Physical/Community Infrastructure + appendix document: Strategic Development Locations Evaluation Matrix (as submitted to Ford Eco Town Select Committee)

Letter from the Headmaster - Westergate Community School

Aldingbourne Tithe map 1846

Ordnance Survey Map 1874 - boundaries revised 1949

RAF aerial photographs 1947- 49

Down my Way: Bertha Watson 2004

Around Aldingbourne - 900 years of social history: Cliff Mewett & Vivienne Salmon 2006

Sussex Biodiversity - Initial Report on behalf of the Villages Action Group 2008