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Our ref 14677/SSL/DPa/9832613v2
Your ref

Dear Sir/Madam

Representation to the Pre-Submission Draft Walberton Neighbourhood Development Plan (Autumn 2015)

On behalf of our client, the Barnham Eastergate Westergate Landowner Consortium, which comprises the Church Commissioners for England, Hanbury Properties Ltd, Cala Homes and Built Form, we set out our representations to the Walberton Neighbourhood Plan Pre-Submission Draft (Autumn 2015). The Landowner Consortium represents the majority interest in the land allocated for development under Policy H SP1 of the Submission Draft Arun District Local Plan (ADLP) and referred to as the Barnham/Eastergate/Westergate (BEW) Strategic Allocation which is situated directly to the west and south-west of the Walberton Neighbourhood Plan boundary.

Our client welcomes the opportunity to submit comments on the emerging Neighbourhood Plan and we would be grateful if you could keep us informed of progress as the Plan progresses. Our comments set out below are specific and in relation to policies HP1 "*Spatial Plan of the Parish*" and GA6 "*A27/A29 Junction West, and Other Strategic Junctions*".

Policy HP1 Spatial Plan of the Parish

Our client does not object to the overall principles of the policy; however, we consider that it is currently imprecise and may lead to ambiguity when determining planning applications within the Parish boundary. The Policy needs to be accurate that it only relates to development proposals within the Neighbourhood Plan boundary (as shown on Page 8). On this basis we suggest the following amendments (**in bold and underlined**) to the emphasis of the second paragraph of the policy:

*"Except as specifically allocated by the Plan for a Rural Exception Site (see Policy HP 6) development in the gaps and countryside surrounding **within the Neighbourhood Plan boundary** ~~Parish~~ and separating the three villages in the Parish from each other will not be permitted"*



Separately, the Policy would benefit from a plan which defines the “Built-up Areas” as it is reliant on the Arun District Council Local Plan 2003 Proposals Map which will be superseded and replaced as part of the emerging Local Plan process following adoption of the Neighbourhood Plan. The third paragraph of the policy should cross-refer to the plan which demarcates the “Built-up Areas”.

The above amendments should also be reflected in point 2 of the key housing aims set out on page 36 as the wording is currently imprecise and implies that development “around the Parish” which could include land within adjoining Parishes allocated for development should be avoided. The following amended wording is suggested:

*“2. To avoid development on the larger sites in the countryside ~~around the Parish~~ **within the Neighbourhood Plan boundary** and in the **strategic** gaps separating it from neighbouring parishes.*

Policy GA6 A27/A29 Junction West, and Other Strategic Junctions

Our client considers that the policy is overly onerous and negative, inconsistent with the strategic objectives of the Submission Draft ADLP and its 'strategic' remit seeks to extend to transport related junction works which are outside of the Neighbourhood Plan boundary. The policy should seek to support the updating and remodelling of junction improvements at the A27/A9 Junction West and other strategic junctions. Local Plan policy and emerging proposals such as those proposed by the Landowner Consortium to divert the A29 through the BEW allocation should be supported as by their nature, these proposals should provide transport benefits to the surrounding area including the Walberton Parish.

Secondly, we consider that it will be difficult to demonstrate and control the relationship between any upgrading / remodelling works to junctions that lie outside the Parish and the requirement to provide ameliorating works to discourage traffic from using the residential roads of the Parish. Strategic policies relating to the District's highway network outside of the Neighbourhood Plan boundary are contained within the Submission Draft ADLP and should not fall within the remit of the Neighbourhood Plan, as set out in the NPPF. Any upgrading and remodelling works to existing or new junctions would be subject to testing and agreement with West Sussex County Council as highways authority and any mitigation should form part of these works.

On this basis, the wording of Policy GA 6 should be amended as follows:

*“Proposals for the upgrading and remodelling of this junction and others that lie outside the Parish will **only be supported where these works will result in an improvement to the traffic environment on roads through Fontwell and Walberton**” ~~considered as negative in effect for parishioners, unless ameliorating works are included in the schemes of upgrade such that additional through traffic is discouraged from using the residential roads of the Parish~~*

Schedule 1

Note that there is a typographical error at Schedule 1 which should refer to policy “GEN2” rather than “EN2”.



Concluding Remark

We trust that our client's representation will be addressed as the document progresses and we request that we are kept updated of further iterations. In the meantime should you have any queries in respect of these please do not hesitate to contact my colleague Pauline Roberts or myself.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'D. Palman'.

Daniel Palman
Associate Director

Copy

John Weir

Church Commissioners