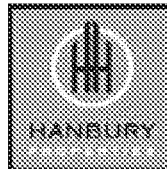


Infrastructure Delivery Plan

Proposed developments at Pagham, Arun District

November 2016



**Taylor
Wimpey**

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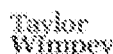
1.0 Introduction

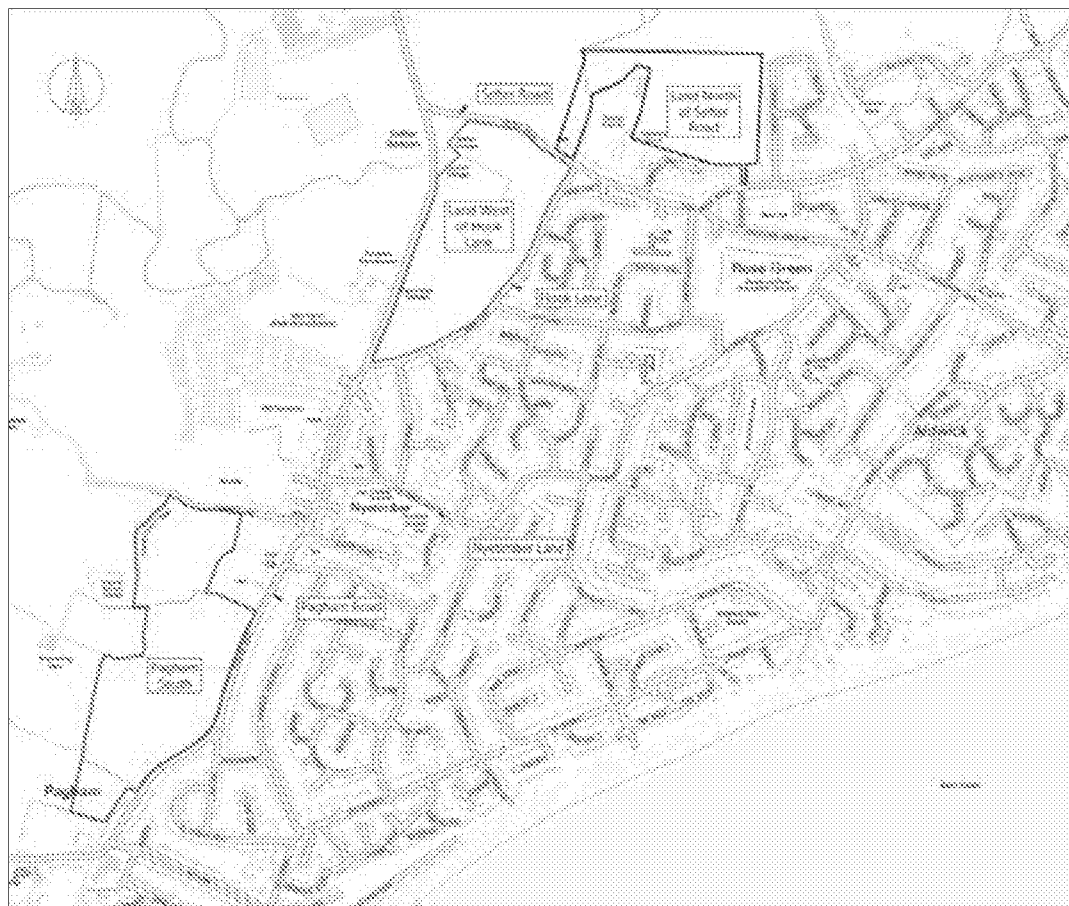
- 1.1 This Infrastructure Delivery Plan has been prepared jointly by Hunter Page Planning, Barton Willmore and LRM Planning in support of the proposed developments at Pagham North and Pagham South.
- 1.2 Planning applications for development at Pagham North and Pagham South are due to be submitted before the examination of the Arun District Local Plan 2011-2031 resumes; the purpose of this report is to demonstrate the infrastructure requirements which will be delivered through the proposed developments in order to give the Local Planning Authority assurance that the necessary infrastructure can be delivered to facilitate development.
- 1.3 The proposed developments that are currently being progressed in Pagham are for the following:

Scheme	Location	Applicant	Description of Development ¹
Land West of Hook Lane, Pagham	Pagham North	Hallam Land Management (promoted by LRM Planning)	The construction of up to 300 new homes, a care home of up to 80 beds, 4,000 sq.m of D1 use class including a 2 form entry primary school, the formation of new means of vehicular access onto Hook Lane and Pagham Road, new pedestrian and cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features and associated ground works and infrastructure.
Land North of Sefter Road, Pagham	Pagham North	Taylor Wimpey (promoted by Barton Willmore)	Up to 250 dwellings, provision of land for a replacement scout hut, land for an Ambulance Community Response Post facility and land for a 1FE Primary school.
Land at Pagham South	Pagham South	Hanbury Properties (promoted by Hunter Page Planning)	Mixed use development comprising up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route, and other community uses including formal sports provision, informal public open space and allotments.

- 1.4 It is also understood that the Osbourne Refrigeration site at Pagham North is being promoted by Nash and Partners for approximately 60 units, although an application is not being progressed at this stage.
- 1.5 It is anticipated that the sites above will be allocated in the emerging Local Plan for the District. The locations of the sites are below and masterplans for the above developments (at the time of writing) are enclosed at **appendix 1**.
- 1.6 This document identifies and demonstrates how the cumulative infrastructure required for all three developments can be secured and delivered in a timely fashion for the wider Pagham area.

1. Please note, these are the descriptions that are currently being progressed and this does not preclude any future applications.





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1.7 Hampshire Services has been commissioned by Arun District Council (ADC) to undertake an infrastructure assessment of sites suitable for allocation within the emerging Local Plan. This is known as the Infrastructure Capacity Study and Delivery Plan (ICSDP). The work analyses the infrastructure implications of a number of potential growth scenarios and inform the development strategy and development sites required as a result of an increase in the housing requirement figure. Phase 1 which consists of 'Infrastructure Requirements for Spatial Strategy Options' was published in August 2016; this report includes an assessment of existing infrastructure and a high level review of infrastructure requirements to help inform selection of sites for future testing. Phase 2 of the Infrastructure Delivery Plan (IDP) is to consider the sites in much more detail with infrastructure providers with the work informing the viability work that would go alongside this. It is expected that this will be presented with the proposed modifications later this year.

1.8 This Infrastructure Delivery Plan is consistent with the requirements identified within the Phase 1 report. In preparation of this Infrastructure Delivery Plan, the same infrastructure providers have been consulted in order to ensure consistency with the Local Plan evidence gathering. The following bodies have been consulted:

- ✦ WSCC Highways;
- ✦ Highways England;
- ✦ WSCC Education; and
- ✦ NHS Coastal West Sussex Clinical Commissioning Group.

1.9 This Infrastructure Delivery Plan focusses on 3 key issues: Highways, Education and Healthcare, which require a joint approach. Other issues will be considered within the planning application documents prepared for each application.



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3.0 Education

- 3.1 There are two primary schools within the current catchment zone of the sites, Rose Green Infant School (age 4-7) and Rose Green Junior School (age 7-11), which together cater for the full primary age spectrum. For secondary education, The Regis School is the only school that falls within the current catchment area.

West Sussex County Council Planning School Places

- 3.2 The 'Planning school places 2016' document sets out the policies and principles of WSCC, provides information on current organisation and future forecasts of pupil numbers. This report identified that at 2015/2016, both primary schools were either close to or over capacity. For secondary education, at 2015/16 The Regis School was considerably below capacity with 1,437 pupil on the roll compared with maximum capacity of 1,993 pupils.
- 3.3 There are currently a number of planned primary school expansions within Arun District, three of which are planned for Bognor Regis (albeit schools outside the sites' primary catchment zone). The expansions are needed to support the projected housing growth of 580 dwellings per annum which was previously considered in the submission version of the Arun District Local Plan 2011-2031. This document has not been reviewed to take into account the uplift in housing to 919 dwellings per annum currently being considered by ADC as part of the main modifications to the emerging Local Plan.

Infrastructure Capacity Study and Delivery Plan

- 3.4 WSCC Education have been consulted as part of the ISCDP forming part of the evidence base for the Local Plan.
- 3.5 The ICSDP Phase 1 report highlights that WSCC operates a number of guiding principles for school provision in terms of size of facility, which will impact on the potential provision at some of the sites. Those parameters are based on the most efficient use of school resources, as well as the most effective teaching environment.
- ✦ Primary schools should have a minimum of one form of entry (FE), 210 places and ideally a maximum of 3FE, 630 places. Sites requiring more than 3FE provision would require two 2FE schools and so on.
 - ✦ Secondary schools should have a minimum of 6FE or above.
- 3.6 The ICSDP Phase 1 report assesses the need for a school at Pagham South and Pagham North. However, it must be noted that the assessment was based on 600 homes being delivered at Pagham South and 300 homes being delivered at Pagham North. The Council has since revised the figures for these sites. In aggregate there is a slight increase in housing proposed but with a greater amount to be provided at Pagham North and a lower quantum at Pagham South and it is anticipated that the Phase 2 Report will reassess this position to reflect the developments set out in paragraph 1.3 of this report.



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- 3.7 In terms of Pagham South, the ICSDP highlights that the area is served by the Rose Green primary school, which is currently at capacity and oversubscribed. It is also at the County's preferred maximum size of three forms of entry (3FE). Development in this area would bring forward the need for a 1FE primary school expandable to 2FE (£5.4 to £10.6 million). In terms of Pagham North, it states that development in this area would not necessarily generate a requirement for a new 1FE primary school; however, the current catchment school is already oversubscribed from within the area. Therefore development in this area would bring forward the need for a land and build costs for a 1FE (£5.4 million) primary school.
- 3.8 The report highlights (in respect of Pagham South and Pagham North) that the secondary school (Bognor Regis) that serves this area currently has capacity for additional pupils, but that position will change depending on cumulative impacts. It states that the likely cumulative pressure on the secondary school could result in the need for a 1FE (up to £6 million) expansion of the existing school.
- 3.9 In terms of early years/nursery provision, the ICSDP states that the provision in the district is determined mainly through parental demand in the local area, government policy and funding. There are currently 41 pre-schools, 21 Day Nurseries, and 122 Child-minders providing 1066 places within the district, and there are seven Children and Family Centres at Angmering, Bognor Regis, East Preston, Felpham, Littlehampton, Yapton and Bersted. However, sufficiency monitoring within the district shows pockets of areas under pressure around Yapton and Littlehampton.
- 3.10 It goes on to highlight that all scenarios across Arun will require additional childcare places. The majority of these places would preferably be additional nursery classes on new school site developments with some provision also being made in suitable community spaces. This increase in capacity would be subject to availability of suitable premises, interest

from providers, and availability of developer funding through the CIL in the event that this is adopted or section 106 (s106) given there is no capital grant funding available.

Primary Education

Requirement

- 3.11 Discussions have also been ongoing between the site promoters and WSCC Education regarding the proposed developments. On 6th October 2016, a conference call was held between Tracey Dunn (School Planning Officer [South], WSCC) and the promoters of the above sites. In this conference call, the need for schools in Pagham was discussed, as well as the requirements which would arise as a result of the 3 planning applications set out at paragraph 1.3 above.
- 3.12 Following this call, a note was received by WSCC which sets out the need and requirements (**appendix 2**).
- 3.13 It is agreed between all parties that the proposed developments only need to mitigate against the effects of the proposed developments, and do not need to resolve any existing capacity issues at Rose Green Primary School.
- 3.14 WSCC has identified that there is a need generated from the proposed developments for a 1FE primary school, with the ability to expand to a 2FE school in the future. WSCC has requested that the school site should be 2.04 hectares in line with the Department for Education 'Notes on area guidelines for mainstream schools: BB103'.

Delivery

- 3.15 It is agreed between all parties that there is only a need for a single 1FE primary school in Pagham based on the proposed level of housing. However, WSCC has identified that it would like to secure a site which has the ability to be expanded to a 2FE primary school in the future.



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3.16 Whilst there is only a need for one additional school in Pagham, the location is yet to be determined. WSCC has highlighted a preference for Pagham South to deliver the school, in order to provide for a good geographical spread of primary schools to serve the village. However, the exact location of the proposed school is for future consideration by WSCC.

3.17 In order to ensure that a school can be delivered, land safeguarded for a primary school is proposed on each of the three application sites at present. This will provide WSCC with choice to determine the most appropriate site and ensure that the education requirements are delivered at Pagham should one or more of the proposed sites fail to be delivered. However, it is agreed between all parties that whilst there will be three planning applications each showing land for a school, only one school site is required for Pagham and accordingly only one of the proposed school sites will be progressed. The choice of locations will be a matter for WSCC to decide upon. For the two sites not required to provide the primary school site, the land identified for this purpose would revert to residential development.

3.18 The delivery of the new primary school will follow on from the resolution to grant planning permission for the three new housing sites in Pagham. The mechanism by which the new school will be delivered will be set out in the Section 106 Agreement associated with each development. However, for clarity it is proposed that the school is delivered through financial contributions from each developer to cover the cost of the construction and land for the school. The development which provides the school site should be paid the equivalent residential land value and loss of profit of development by the other developers. Payment for this land should be made via the S106 Agreement. Staged payments for the financial contribution towards the construction of the school

should be made after the completion of every 100th house on each site.

Secondary Education

3.19 'West Sussex County Council Planning School Places' identifies existing capacity at The Regis School more than sufficient to accept the number of children generated from the proposed developments.

3.20 In light of the above, it is not anticipated any mitigation is required. However, if there is additional demand for secondary education, this will be mitigated through financial contributions to new or enhanced off-site provision. Contributions will be in accordance with the requirements set out within 'Planning Obligations: Explaining Contribution Calculations'. A similar approach will also be taken to mitigate demands for special educational needs (SEN) and post-16 provision.

Early Years Provision

3.21 As set out above, all the scenarios for growth across Arun will require additional childcare places. The development at Hook Lane includes a day nursery and the local centre at Pagham South includes D1 space, so has the ability to deliver a crèche. As such, the early years requirements in Pagham can be met through the proposed developments and no further mitigation is required.

3.22 The development which provides the early years facility should be paid the equivalent residential land value and loss of profit of development by the other developers. Payment for this land should be made upon implementation of the residential permission via the S106 Agreement. Staged payments for the financial contribution towards the construction of the crèche should be made after the completion of every 50th house on each site.



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4.0 Primary Care

- 4.1 The closest existing GP surgeries to the 3 sites are as follows:

Surgery	Approximate Distance		
	Hook Lane	Sefter Road	Pagham South
Grove House (Main Surgery)	0.7 miles	0.8 miles	1.5 miles
Grove House (Branch Surgery – Arthur Griffiths Clinic)	1.5 miles	1.9 miles	0.5 miles
Westmeads Surgery	1.6 miles	1.4 miles	2.4 miles

- 4.2 Clinical GP services within the District are provided by Coastal West Sussex Clinical Commissioning Group (CCG). Discussions have been held with Simon Clavell-Bates at Coastal West Sussex CCG in order to establish the need in Pagham.

Infrastructure Capacity Study and Delivery Plan

- 4.3 The current position and need for health facilities in the District are also set out in the ICSDP Phase 1 report. This report states that current services within the District are considered to be at crisis point, with the key constraints to service provision being that infrastructure is aged and in need of improvement/re-provision, and staffing levels are below required levels. Supported improvements in infrastructure, and funding support for service provision to cover increased populations will be required from future development growth.
- 4.4 The report highlights that the primary care (GP) services in the District have a historic background of being run from 'houses' and this legacy has quite an impact. Decades of growth and 'tweaking' the current infrastructure has led to the position where services cannot expand or cope with any more growth in existing facilities. New purpose builds/provision is required, but with limited NHS investment, part of this

improvement plan would need to be based around joint working, shared resources and CIL (in the event that this is adopted) and developer contributions.

- 4.5 The report highlights that CCG has identified a number of mitigation measures which could help. Health centres, relocation of current GP services into new GP buildings in new sites, and funding for clinical sessions to be set up as development progresses.
- 4.6 The ICSDP highlights that Pagham South is currently served by West Meads surgery which has capacity in the short term; however, it states the development of the site for 600 homes would be an increase of around 25% patient numbers. This would put the facility at critical point and potentially compromise care in the area. Pagham North is currently served by Grove House Surgery but this surgery is already under pressure and at capacity. The ICSDP highlights that short term re-structuring of sites and services in the area is part of on-going planning, but these sites represent a step change to working baseline. Bognor Health Centre re-provision may part solve this, but current infrastructure will need upgrading and expanding.
- 4.7 As above, the ICSDP Phase 1 report was based on 600 homes being delivered at Pagham South and 300 homes being delivered at Pagham North; nevertheless it is clear from the above that the local surgeries are at or close to capacity.



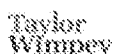
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Requirement and Delivery

4.8 Discussions with CCG (Simon Clavell-Bates) have been undertaken to discuss the need for primary care facilities in Pagham specifically. These have been primarily regarding the broad-brush approach undertaken by CCG as part of the evidence base for the emerging Local Plan. Initial discussions indicate the following:

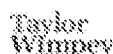
- ✦ Based on number of homes proposed in Arun District, the population will increase by approximately 40,000 people.
- ✦ 10,000 new patients results in a need for a new GP surgery, so approximately 4 new surgeries are needed in total across the district.
- ✦ Current work is looking at potential locations for surgeries, and this depends on existing surgeries/capacity/ability to expand. Current work includes reviewing any constraints around leases, ownership etc of current GP provision. The best location (including size and configuration) for the primary care sites in the District is still in the feasibility stage.

4.9 The proposed development at Pagham South includes a local centre. The detail and exact breakdown is yet to be established; however, the description being progress is for 'a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace which is expected to include local shops and cafes including a small convenience store, primary care facilities (GP surgery), and facilities for the young (crèche/youth centre) and elderly (day centre).' As such, there is the opportunity for a GP surgery/health centre to be provided in Pagham if it is deemed that this in an appropriate location where additional services are required. This will be able to serve the proposed new developments as well as relieve the pressure on the existing provision.



5.0 Conclusion

- 5.1 This Infrastructure Delivery Plan has been prepared jointly by Hunter Page Planning, Barton Willmore and LRM Planning in support of the proposed developments at Pagham North and Pagham South. Three planning applications for proposed development within Pagham are due to be submitted ahead of the Local Plan and therefore the primary purpose of this document has been to identify and demonstrate how the cumulative infrastructure required for all three developments can be secured and delivered in a timely fashion for the wider Pagham area.
- 5.2 The report considers the evidence base for the emerging Arun District Local Plan 2011-2031, in particular the Infrastructure Capacity Study and Delivery Plan (ICSDP), prepared by Hampshire Services. Further discussions have also taken place with relevant bodies and infrastructure providers in order to agree the proposed infrastructure and ensure consistency with the Local Plan evidence gathering, to which they have been consulted.
- 5.3 This Infrastructure Delivery Plan assesses the baseline position as well as requirements arising from the proposed developments in the area. In short, the proposed developments, between them, can provide the following infrastructure:
- ✧ 1FE Primary School (with sufficient space to ensure that it is expandable to 2FE);
 - ✧ Provision for early years education;
 - ✧ GP Surgery/Contributions towards Primary Care; and
 - ✧ Highways mitigation.
- 5.4 Financial contributions will be provided by the developers, to be secured through S106 Agreements, in order to ensure the delivery of the necessary infrastructure. As such, this report demonstrates that the required infrastructure in Pagham can be delivered through the proposed developments. To conclude, the proposed developments mitigate for any cumulative effects arising from the developments in terms of the provision of infrastructure.



Appendix 1

Proposed Illustrative Masterplans

Hook Lane Masterplan Options



Application Boundary

- Hook Lane - Vehicular Access**
Two vehicular access points are proposed onto Hook Lane. Where practicable the existing boundary hedge and trees are to be retained and reinforced.
- Hook Lane - Pedestrian Access**
Dedicated pedestrian / cycle access between Hook Lane and the site provide direct access between the site's Public Open Spaces and existing housing to the east.
- Pagham Road - Vehicular Access**
One vehicular access point is proposed onto Pagham Road to the south of the site.
- Care Home**
A proposed new care home (up to 80 beds) with south facing gardens and dedicated car parking.
- Day Nursery**
A proposed new day nursery. Includes public realm and dedicated car parking.
- High Quality Housing**
Up to 300 high quality homes in a mix of sizes and styles.

- 'Hook Meadow'**
To the south of the site a small green provides an attractive outlook for the proposed care home, informal recreation space and ensures that development is set back from the junction of Hook Lane and Pagham Road.
- Western Boundary**
Along the site's western boundary a green buffer (minimum 20m in width) is proposed. This will retain existing boundary hedge planting and reinforce this with new woodland planting. A linear Swale / attenuation basin is proposed to run parallel to the boundary. This feature will be predominantly dry, filling to accommodate heavy rainfall events.
- Play Space**
A proposed new children's play area with wider links to the site's Green Infrastructure network.
- 'Downs View'**
Within the centre of the site a large area of open space is proposed for informal recreation. The existing watercourse running through the scheme (Point K) is to be realigned and a new viewing mound created for views north towards the South Downs. An existing bench with memorial dedication off Hook Lane is to be relocated and set within the Downs View open space area.

- K** The existing watercourse running through the site currently has a trapezoidal profile and geometric alignment. This watercourse is to be realigned along a meandering path and opened up to include riffles and pools, riparian planting and waterside seating.
- 'Setter Meadow'**
To the north of the site a wide open space is provided for informal ball games, picnics and dog walking.
- M** Northern Boundary
Along the site's northern boundary a green buffer (minimum 20m in width) is proposed. This will retain existing boundary hedge planting and reinforce this with new woodland planting. Existing green space to the east of the Hook Lane / Setter Road junction is to be mirrored within the development to provide a gateway into Hook Lane from the north.

- Existing tree planting to be retained
- Proposed tree and structural woodland planting
- Proposed Sustainable Drainage (SuDS) - attenuation basins
- Meadow seeding
- Proposed new housing
- Primary road network with key junctions
- Secondary road network - Distributor Roads
- Tertiary road network - Private Drives and Shared Surfaced Areas
- Indicative footways / cycleways



All dimensions to be verified on site. Do not scale this drawing. All discrepancies to be clarified with project Landscape Architect. This drawing is the property of Urban Wilderness Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of Urban Wilderness Ltd. Ordnance Survey material is used with the permission of The Controller of HMSO. Crown copyright LAN1001412.

C 27.10.15 Initial Location Plan
D 06.05.16 Independent View
A 27.05.16 Approved Key
REV | desc | details



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Client
Hallam Land Management Ltd

Project
Hook Lane, Pagham

Drawing title
Landscape Masterplan

Drawing status
CONSULTATION

drawn by NJE	checked by NJE	date 16 May 16
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scale 1:1250	paper size A1
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job/dwg no. 167/P/003	rev. C
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Application Boundary

- Hook Lane - Vehicular Access**
Two vehicular access points are proposed onto Hook Lane. Where practicable the existing boundary hedge and trees are to be retained and reinforced.
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- Pagham Road - Vehicular Access**
One vehicular access point is proposed onto Pagham Road to the south of the site.
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A proposed new care home (up to 80 beds) with south facing gardens and dedicated car parking.
- Day Nursery**
A proposed new day nursery. Includes public realm and dedicated car parking.
- High Quality Housing**
Up to 300 high quality homes in a mix of sizes and styles.

- 'Hook Meadow'**
To the south of the site a small green provides an attractive outlook for the proposed care home, informal recreation space and ensures that development is set back from the junction of Hook Lane and Pagham Road.
- Western Boundary**
Along the site's western boundary a green buffer (minimum 20m in width) is proposed. This will retain existing boundary hedge planting and reinforce this with new woodland planting. A linear Swale / attenuation basin is proposed to run parallel to the boundary. This feature will be predominantly dry, filling to accommodate heavy rainfall events.
- Play Space**
A proposed new children's play area with wider links to the site's Green Infrastructure network.
- 'Downs View'**
Within the centre of the site a large area of open space is proposed for informal recreation. The existing watercourse running through the scheme (Point K) is to be realigned and a new viewing mound created for views north towards the South Downs. An existing bench with memorial dedication off Hook Lane is to be relocated and set within the Downs View open space area.

- K** The existing watercourse running through the site currently has a trapezoidal profile and geometric alignment. This watercourse is to be realigned along a meandering path and opened up to include riffles and pools, riparian planting and waterside seating.
- 'Seftor Meadow'**
To the north of the site a wide open space is provided for informal ball games, picnics and dog walking.
- M** **Northern Boundary**
Along the site's northern boundary a green buffer (minimum 20m in width) is proposed. This will retain existing boundary hedge planting and reinforce this with new woodland planting. Existing green space to the east of the Hook Lane / Seftor Road junction is to be mirrored within the development to provide a gateway into Hook Lane from the north.
- Primary School**
A Proposed two form entry primary school with playing field to the south and car parking area to the north.

- Existing tree planting to be retained
- Proposed tree and structural woodland planting
- Proposed Sustainable Drainage (SuDS) - attenuation basins
- Meadow seeding
- Proposed new housing
- Primary road network with key junctions
- Secondary road network - Distributor Roads
- Tertiary road network - Private Drives and Shared Surfaced Areas
- Indicative footways / cycleways



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27.10.18 First Issue
10/11/18 12/11/18



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Client
Hallam Land Management Ltd

Project
Hook Lane, Pagham

Drawing Title
Landscape Masterplan with School

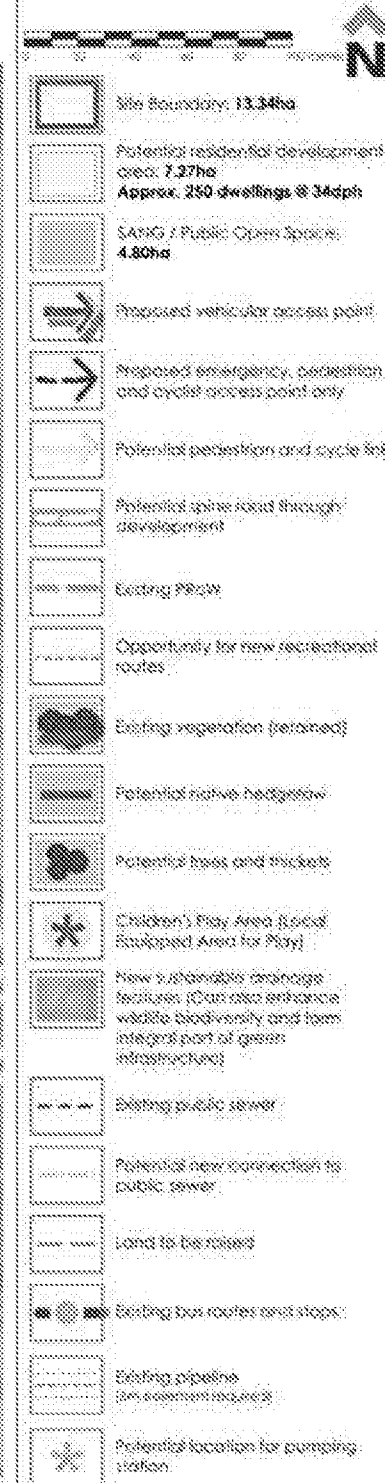
Drawing Status
CONSULTATION

drawn by	checked by	date
NJE	NJE	27 Oct 16

scale	project size
1:1250	A1

plot/dwg no.	rev
167/P/005	-

Sefter Road Masterplan



B	19.10.16	A2	Amendments to access
A	13.10.16	A3	Minor amendment to way
Rev	Date	By	Description

CSA
environmental

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Project: Land West of Sether Road, Pugham, Rotherham

File: Development Framework Plan

Client: Taylor Wimpey UK Ltd.

Drawn:	T 2008/08/A2	Checked:	SR
Date:	30/07/2016	Checked by:	SR
Project Ref:	CSA/2008/115	Proj:	B

Pagham South Masterplan

Appendix 2

Note from WSCC re Education Requirements

PAGHAM SCHOOL REQUIREMENTS

Education and Schools

We have a statutory responsibility to provide education for all children of school age, normally ages four to 16, and to ensure sufficient nursery education for three- and four-year-olds in partnership with other sectors.

Our policies for admission of pupils to schools aim to ensure that parents can normally expect places for their children at the schools serving the area in which they live.

The housing and population characteristics of the wider area will provide a guide in the assessment of the likely age profiles and additional children arising from the proposed development. The average standards are set out in the table below.

School Type	Child Product
Primary (ages 4 to 11)	25 per 100 dwellings
Secondary (ages 11 to 16)	18 per 100 dwellings
Secondary (ages 16 to 18)	41 per 100 dwellings

The above is an extract from the Planning Obligations: Explaining Contribution Calculations publication, full details, further information can be found by following the link below

https://www.westsussex.gov.uk/media/8103/s106_explaining_contribution_calculations.pdf

For the development(s) in Pagham which we believe to be for a total of 1000 new dwellings we would anticipate the requirement to be for a new 1FE expandable to 2FE school.

$25/100 \times 1000 = 250$ pupils (35 per year of age) just over a 1FE.

Our preference would be for a new education provision to be in the South of Pagham, due to proximity of the northern developments to existing schools.

The size of the school site required would be 2.04ha in line with the Department for Education BB103 guidance.

