

Sandra Edwards

From: Amanda Scholes on behalf of Planning.Responses
Sent: 09 August 2017 08:55
To: Planning Scanning
Subject: FW: Applications P/25/17/OUT, P/140/16/OUT, P/6/17/OUT and P/134/16/OUT
Attachments: Pagham strategic sites.pdf; Proposed Main Modifications to Arun LP 2011 (submitted 02-06-17).pdf

Hi
Please scan onto all these applications.
Thanks
Mandy

From: Naomi Langford [REDACTED]
Sent: 08 August 2017 10:50
To: Planning.Responses; David Innes
Cc: DCPlanning
Subject: Applications P/25/17/OUT, P/140/16/OUT, P/6/17/OUT and P/134/16/OUT

Dear David

Please find attached Chichester District Council's comments on the above applications. I have also attached a copy of the consultation response on the modifications to the Arun Local Plan which is relevant to this response.

Regards

Naomi



Naomi Langford

Senior Planning Officer
Development Management - Majors & Business
Chichester District Council

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Mr David Innes
Application case officer
Arun District Council

If calling please ask for: Naomi Langford
Senior Planning Officer

By email:
planning.responses@arun.gov.uk
David.Innes@arun.gov.uk

Your refs (our refs): P/25/17/OUT (17/02147/ADJ)
P/140/16/OUT (17/02148/ADJ)
P/6/17/OUT (17/02149/ADJ)
P/134/16/OUT (17/02150/ADJ)

Date 08 August 2017

Dear Mr Innes

P/25/17/OUT: Outline application for access only - Erection of up to 89No. dwellings, access roads, landscaping, open space & associated works. This application is a Departure from the Development Plan. Land at Church Barton House, Pagham

P/140/16/OUT: Outline application for access only - mixed use development comprising of 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 & other community uses including public open space & allotments with some matters reserved. This application is a Departure from the Development Plan. West of Pagham Road, Pagham

P/6/17/OUT: Outline application with some matters reserved for construction of up to 300No. new homes, Care home of up to 80No. beds, D1uses of up to 4000sqm including a 2 form entry Primary School, formation of new means of access onto Hook Lane & Pagham Road, new pedestrian & cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features & associated ground works & infrastructure. This application is a Departure from the development plan. Hook Lane, Pagham

P/134/16/OUT: Outline application with some matters reserved for development of up to 250 dwellings (incl affordable homes), provision of land for a replacement scout hut, land for an Ambulance Community Response Post facility & land for 1FE primary school. Primary vehicular access from Sefter Rd & demolition of 80 Rose Green Road & creation of pedestrian & emergency only access. Provision of public open space incl childrens play areas, landscaping, drainage & earthworks - Departure from the Development Plan. This application also falls within the parish of Aldwick. Land North Of Sefter Road, Pagham

Thank you for consulting Chichester District Council on the above applications. This response is relevant to all four applications as it relates to the individual and cumulative highways and transport impact of the developments proposed on roads and junctions within Chichester District.

Firstly, CDC wishes to refer you to the comments made on the proposed main modifications to the Arun Local Plan 2011-2031, dated 2 June 2017. It is understood that a further transport study has been commissioned in response to the concerns expressed by ourselves and statutory highway bodies. Our concerns expressed in that letter are particularly relevant to the above applications. A copy is attached for your attention.

The traffic generated by the developments proposed above would, without effective mitigation, result in a severe impact on the roads and junctions within Chichester District, particularly the A27/B2145 junction (Whyke Roundabout) and the A27/A259 junction (Bognor Road Roundabout) on the trunk road network, and the Runcton and North Mundham/Hunston roundabouts on the WSCC road network (NPPF paragraph 32 applies). These junctions already generate significant delays at peak times from existing developments within Chichester District and the high volume of through traffic. All development within the Chichester Local Plan has been assessed for its impact on the A27 and related junctions, with mitigation secured through the Local Plan for allocated sites, or on a bespoke basis for additional development. CDC would expect ADC to adopt the same approach in partnership with West Sussex County Council and Highways England.

It is acknowledged that a joint consultative group has been established between the highways consultants for the three largest development sites, who have been in discussions with Highways England and WSCC. CDC's preference would be for a comprehensive assessment and mitigation strategy for all development allocated at both strategic and neighbourhood level within the emerging Local Plan (as modified), as advised in our Policy response dated 2 June 2017. Nevertheless CDC also recognises that development may need to be brought forward in advance of the Local Plan, and welcomes the positive approach that ADC is taking to addressing housing and employment needs within the Chichester & Bognor Regis market area. CDC is encouraged to see that the joint consultative group has recognised that mitigation for roads and junctions within Chichester District is necessary. CDC strongly recommends that this group is expanded to include the fourth site (P/25/17/OUT) and that the appraisal and recommendations are updated accordingly.

CDC encourages ADC, WSCC and HE to review these proposals carefully to ensure that they are satisfied that the data presented is accurate and the works proposed will be effective. Until such time that HE and WSCC confirm their satisfaction with all aspects of the mitigation, including physical works, costing and timetables, CDC wishes to express strong concerns about the highways and transport impacts of the proposed developments.

Yours sincerely,



Naomi Langford
Senior Planning Officer
Development Management - Majors & Business
Chichester District Council

Proposed Main Modifications to the Arun Local Plan 2011-2031 Consultation Response from Chichester District Council

This consultation response relates to the Modifications proposed to the Arun Local Plan (in particular the strategic allocations proposed close to the Chichester District boundary at West of Bersted and Pagham) and the supporting modelling work published in the updated Arun Transport Study 2016.

Of particular issue is Modification Reference number MM20 (and potentially MM23, MM24 and MM25) and Policy: H SP2 (criterion k) and possibly Policies H SP2a-c.

In general terms, Chichester DC supports the development strategy set out in the proposed Modifications to the Local Plan and welcomes the positive approach that Arun DC is taking to addressing housing and employment needs within the Chichester & Bognor Regis market area.

However, Chichester DC is concerned that the potential cumulative impacts of the proposed housing developments on the A27 Chichester Bypass junctions may not have been fully identified in the transport evidence underpinning the Plan Modifications and that the Plan policies as currently worded do not provide assurance that the planned development will provide adequate mitigation for the likely traffic impacts.

The adopted Chichester Local Plan Key Policies 2014-2029 makes provision for planned strategic housing developments in the Chichester Local Plan area to fund a coordinated package of improvements to the A27 Chichester Bypass junctions that will increase road capacity sufficient to mitigate their cumulative impact. However, these measures are not considered sufficient on their own to accommodate additional development over and beyond that currently identified in the Chichester Local Plan. Furthermore, within the past year, Chichester DC has considered a number of planning applications in the Chichester Local Plan area which have involved development additional to that in the Local Plan, where Highways England has requested that the development provide a financial contribution to fund further mitigation to the A27 junctions beyond the improvements identified in the Local Plan scheme.

It is noted that the Arun Local Plan Modifications are supported by transport modelling work set out in the Arun Transport Study 2016 Phase 3 undertaken by Systra. The modelling undertaken in the study identified two junctions on the A27 Chichester Bypass (the B2145 Whyke and A259 Bognor Road junctions) as among 15 road junctions where the planned development would cumulatively have 'Severe' impacts without mitigation. However, when modelling was undertaken incorporating the capacity improvements already identified for these junctions in the Chichester Local Plan and the planning permission for the Chichester Free School at Hunston, the study identified 'No severe impacts'. The study therefore concludes that no further mitigation will be needed to support the planned developments in Arun. This conclusion is reflected in the Arun Local Plan Modifications which make no reference to any requirement for planned strategic developments to provide mitigation for impacts on the A27 at Chichester.

The Systra findings do not therefore appear to be consistent with the Highways England advice to Chichester DC in responding to recent planning applications in the Chichester Local Plan area. It should also be noted that the scale of the housing developments proposed in the Arun Local Plan is substantially greater than the planning applications in the Chichester Local Plan area where Highways England has sought mitigation, and some of the proposed locations in Arun are as near (or nearer) to the A27 Bypass junctions (e.g the proposed allocations West of Bersted and at Pagham).

For this reason, this Council considers that further detailed transport work may be necessary to identify the full traffic impact of the proposed development on the A27 at Chichester and to ensure that the relevant developments contribute towards mitigation measures in line with and equitable to the contributions being sought in the Chichester Local Plan area.

In the Local Plan Modifications as currently drafted, Policy H SP2 provides only a very general requirement that comprehensive development of the allocation should *“address the off-site capacity requirements, that relate to that particular allocation, identified in the Arun Transport Assessment and the local highway network”* (criterion k), whilst Policies H SP2a-c which set out requirements for each of the strategic allocations include no reference at all to any requirement to mitigate traffic impacts on the A27 Chichester Bypass junctions.

Chichester DC would wish to see additional transport modelling work undertaken to assess the proposed strategic allocations in the Arun Local Plan on an equivalent basis to developments proposed in the Chichester Local Plan area. Assuming that this work identifies a requirement for individual strategic sites to fund or contribute towards measures to mitigate traffic impacts on the A27 Bypass junctions, this would need to be reflected in further modifications to Policies H SP2a-c as appropriate.

Following discussions with officers of Arun DC, it is understood that the council is completing a brief (informed by Highways England and WSCC) to commission further transport modelling work and that the results of this further study will be reported to the reconvened Examination.

Should the outcome of this further work result in a further modification to the Local Plan and a requirement for individual sites to contribute towards measures to mitigate traffic impacts on the A27 then this will have addressed the concerns of Chichester DC about the soundness of the plan.

Chichester District Council
2 June 2017