



From: Parish Clerk [REDACTED]

Sent: 23 August 2017 09:40

To: Planning.Responses; David Innes

Subject: P/140/16/OUT - amendments to the original application relating to the submission of additional drawing and revised cumulative transport assessment & response to developer comments

Please find attached the comments of Pagham Parish Council in relation to the submission of amendments to the original planning application in respect of additional drawings and cumulative transport assessment. The Council has also taken this opportunity to reply to the developer's response to Pagham Parish Council's previous comments regarding these development proposals, which it trusts will be taken into account when determining this application.

Kind regards

Nicola

Nicola Jones
Clerk & RFO
Pagham Parish Council

Deep concern was felt whilst examining the Hanbury “mitigation proposals” in respect of the cumulative traffic impact on the access road system arising from those 4 developments adjoining the existing built up area. There were no proposals to upgrade Pagham Road itself. Existing junctions at Hook Lane, Sefter Road and Lower Bognor Road were all claimed to be satisfactory.

There have been several accidents at the Pagham Road/Sefter Road junction. Sefter Road is very narrow. Lorries turning at the junction present particularly severe problems for vehicles approaching from the opposite direction. Sight line to the north present problems, which is further complicated by speeding vehicles on the unrestricted Pagham Road. Visibility to the south is impeded by a hedgerow on the outbound bend. This is also very seriously affected by the road narrowing adjacent the Sefter School House due to the kerb being projected into the road in order to accommodate people queuing for the adjacent bus stop. When a bus has stopped there, visibility to the left for those exiting Sefter Road is very seriously diminished.

A very deep ditch occupies the verge flanking the eastern hedgerow to Pagham Road. Vehicles swerving to avoid other oncoming vehicles, or those exiting Sefter Road routinely finish upturned in that ditch. There are no proposals to deal effectively with those problems. The unregulated imposition of significantly increased traffic levels, particularly at high density commuter periods, can only contribute to far worse highway safety situations.

We contend that the sight-lines, visibility and access splays, together with road widening, would all be absolute necessities in the interests of public safety. Additional traffic would further input upon existing problems at these locations, which is currently witnessed at commuter times and holiday seasons. It is incongruous that, whilst problems have been admitted at the Lower Bognor Road (Royal Oak) junction by the ADC Assistant Director of Planning, no solutions have been presented. A study of the junction conducted by Parish Council during 3 sessions at commuter periods revealed no less than 9 instances of emergency braking & swerving by Pagham Road traffic whilst seeking to avoid collision with vehicles emerging from Lower Bognor Road (B2166).

The Pagham Road/Lower Bognor Road (B2166) junction at the Royal Oak pubic house should not be so wantonly ignored. It was acknowledged by the ADC Assistant Planning Director as to present serious problems. The road is narrow and sight lines are poor, particularly across the periphery of Crimshaw Manor, towards Chichester (hence the witnessed emergency braking). Lower Bognor Road regularly floods at several locations, particularly at the winding access junction to Park Farm. Deep ditches flank the southern boundary of that road and a culvert conveys a proportion of drainage beneath Pagham Road toward the Pagham Rife. This is sometimes compromised when the Rife is flooded and out-of-bank. The situation is therefore far from satisfactory, and is further compromised by vehicles entering or leaving the pub car park and forecourt. Garden walls of adjacent homes bear witness to vehicle impacts. A Sainsburys 40 ton HGV has been on its side in the adjacent ditch!

The unclassified (Southern) stretch of Pagham Road was stated by the WSCC Highways Superintendent at a 2012 meeting of the JWAAC Highways & Transport Sub Committee to be the “most dangerous unclassified road in the County”. The whole length of that road has always been regularly used by farm vehicles (often very large, 4WD tractors drawing heavy equipment and massive trailers). Detritus is frequently deposited on the highway which, coupled with crossfall, ponding, seasonal frost, all contribute to safety problems on a narrow winding and undulating country road, flanked at many locations by deep ditches only two feet from the tarmac. The latter are essential not only for highway drainage, but as a much wider agricultural field drainage system. Sadly it is not always 100% effective in draining the road. Land acquisition, drainage re-design, highway widening and re-profiling, relocation of buried roadside services etc, hedge removal (wildlife corridors and habitat) all would render the necessary improvements exceedingly problematic and expensive. Incidental estimates range from £10m to £25m. Water flows across the road from the Parigo Nursery site. The winding section of Pagham Road constructed nearby as a consequence of the 1999-2001 Chichester Flood Alleviation Scheme is a location where vehicles are frequently seen in the adjacent ditches. Further along Pagham Road towards Chichester (classified B2166), mud and soil is often to be seen deposited. This is a consequence of agricultural work being undertaken on the site operated by Hills & Co. This further reinforces the situation that Pagham Road (both classified and unclassified sections) has always served the purposes and business of agriculture. This is its character, which is far removed from massive urban developments. One of the farming enterprises (Barfoots of Botley) is, however, significantly industrialised. Not only do they farm a significant area west of Pagham Road, but they also lease and own land in Hampshire and even other sites nearby at Pagham. Their admin centre is west of Pagham Road and a very large preparation, packing and chilling facility is there too alongside, together with a significant recycling, biodigester for electricity generation. This complex is served by many 40 ton HGV vehicles together with large tractor-drawn trailers which service those units. These vehicles can be very intimidating when confronted on that only direct access to the strategic road network or Chichester. WSCC Highways Department paid particular careful scrutiny to proposals for significant expansion of the Barfoots processing plant and new glasshouse development. Both involved many more HGV transit journeys to bring produce to the site and then for delivery to the 2 major supermarket chains which are the main clients. Consent was eventually secured, but there is no real indication in the Hanbury traffic analysis that this has been adequately considered.

The small amount of widening at approaches to Hunston and Vinnetrow roundabouts can only be regarded as “peripheral tinkering” as we contend that there has been no real effort to deal with, or cost, the very real problems which require detailed consideration if the local road network was to be expected to cope with the projected new traffic levels that would be consequential upon proposed development

The Parish Council have considered the rebuttal statements made by the developers consultant concerning some of the comments made in our initial consultation and would reply as follows:-

Point 1. Impact of development on agricultural land.

The Parish Council is aware that this site is extremely important in lettuce and vegetable production. The site is located on agricultural land classified as “best and most versatile” quality which is considered the most productive and which is offered protection from development by national planning policy. The principle factors influencing agricultural production are climate, site and soil.

There is no doubt this site consist of prime agricultural land and with its natural high groundwater level and very good climate should be given the full protection it deserves.

Point 2. Local jobs relating to agriculture and tourism will be lost.

Estimates of job creation and wages suggested by the developer do not appear to have any substantive proof to demonstrate their reasonableness. Additionally, the jobs created during construction phases will be temporary in nature and unlikely to be local trades people as there is a local shortage. Additionally, we would question whether the negative impact on employment has been considered as there will be a substantial loss of agricultural employees as well as an unquantifiable loss relating to tourism.

The Parish Council also have concerns that the impact of the development would be so severe on the tourism trade, especially Church Farm Holiday Park, that they may consider relocating elsewhere.

Point 3. Existing Primary care facility in Pagham underused

Currently there is a lack of trained professional medical staff in the Parish resulting in appointment difficulties at the surgeries. This area has a higher level of retired people which puts additional pressure on the existing healthcare facilities. The suggestion of an additional healthcare facility would not deal with this staffing issue and likely result in it being turned into additional housing.

Point 4. Primary School provision

The suggestion that the school site and its funding would be secured by a legal agreement to assure the community that it would be delivered when needed by WSCC is purely speculative. If the school is not required this area would resort to additional housing via the back door approach.

Point 5. Traffic and existing road network.

It is clear that the developments cannot deal with the strategic improvements that are required to cater for the additional car movements. The proposals put forward are just tinkering with the problem and do nothing to deal with the real issues. There is no doubt that householders place a heavy reliance on car use and the developers proposal to make contributions towards sustainable transport measures will do nothing to alleviate the traffic jams experienced every day.

Unless the developments, in conjunction with Highways England and WSCC, can fund and assure delivery of significant junction improvements both on local and strategic routes the situation will only be made worse.

Point 6. Housing mix

The Parish Council consider that the highest priority should be to provide low cost starter homes for the younger generation. We have seen numerous examples of recent developments where the 'affordable' housing provision is still out of the reach of the majority of first time buyers. Additionally, if development is to supply the local need (which is highly debatable) then the higher percentage of elderly people in the area would require bungalows and not 3/4 bed houses.

Point 7. Screening of the site

We are pleased to see there is a proposal to provide a landscape buffer. It is questionable of what this will consist of, and whether the 10-15m proposed would include the existing hedgerow, ditch etc. If it did it would not be nearly adequate enough.

Point 8. lack of information on groundwater levels.

To get an accurate representation of current and potential groundwater levels it is not unreasonable to request groundwater monitoring to take place over wet periods. We know that the Environment Agency monitor certain groundwater levels eg Chilgrove, and it is reasonable to expect predictions to be made related on extreme events. No work has been done on this so the results are incomplete and unreliable.

Point 9. Watercourse/culvert condition and capacities

The developer's consultant has submitted no evidence as to the size and condition of culverted sections of the surrounding and receiving watercourses so no assessment can be made on their capacities. The Parish Council has received 'Watershed' money from WSCC to undertake the most important work in this locality to help reduce flooding but this has not considered the watercourses on this site as it is agricultural land and impact on local residents is currently minimal. We consider it reasonable for the developer to look at the watercourses that will receive surface water drainage from the proposed development.

The developer makes the assumption that the watercourses are maintained by landowners and Arun District Council. We do not believe that Arun District Council has a maintenance programme for undertaking ditch clearance and we know that land owners do not tend to do until there is a problem which is too late. It is far better to over design the ditch and culvert capacities to help design out this potential flooding problem

Point 10. Lack of capacity at Pagham Waste Water Treatment Works (PWWTW)

The developer's consultants are misguided if they consider there is not to be a problem with extra capacity at PWWTW. Obviously, if Southern Water were to radically upgrade the works then additional capacity in theory could be provided. However, these works have had improvement works undertaken in the past and there are still capacity issues. For example, sacrificial sewage flooding occurs at Church Farm Holiday Village when Southern Water remotely shut down their pumps due to lack of capacity at the Works. Also we are aware that PWWTW has failed to deal with the capacity on at least 55 occasions over the last 6 years and untreated sewage has had to be discharged into the Pagham Rife. This has been overlooked by the development.

Point 11. Environmental Impact Assessment not carried out.

Due to the site location being so close to the European protected Pagham Harbour SPA and RAMSAR site we are amazed that the Secretary of State came to the conclusion that the development is unlikely to have a significant effect on the environment. We know that wintering birds have regularly used this site in the past. We can only think that the SOS did not have the full information when the decision was made.

Point 12. Impact on protected species

We note that Chichester District Council Ecologist has raised significant concerns in relation to the impact of the development. This combined with the issues identified in Petra Billings Report and the comments made by the Sussex Ornithological Society clearly shows the development will have a detrimental impact especially in relation to wintering birds.

It has been recognised by Natural England, RSPB and the Council Ecologist that permitting new housing development near to Pagham Harbour SPA/Ramsar site would not comply with the Habitat Regulations that apply to the site without a strategic scheme of mitigation measures.

At Pagham Harbour the SPA species are; wintering dark-bellied brent geese, ruff, pintail and black-tailed godwit, and breeding little and common terns.

We know that RSPB has been engaged with Natural England and Arun District Council during the development of their local plan, to identify and address likely impacts of nearby developments on Pagham Harbour SPA/Ramsar site. As a result of this approach, there is now a strategic mitigation package in place which sets out to manage any increased recreational disturbance to Pagham Harbour SPA and Ramsar site, due to any new housing. However, this did not take into consideration additional supporting information provided by SOS and Petra Billings regarding the wintering birds. Therefore, any decision on this application should be deferred until an Appropriate Assessment has been undertaken.

Additionally, we do not agree that the development proposals 'will enhance the natural environment ...' as stated by the developer's consultant. Clearly covering prime agricultural land, displacing wintering birds, changing the visual landscape, introducing more cars and people/dogs, will do nothing to enhance the natural environment and it is ridiculous to state otherwise.