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Mr D. Easton
Principal Planning Officer
Arun District Council
Civic Centre, Maltravers Road
Littlehampton, West Sussex
BN17 5LF



10th May 2018

Dear Mr Easton

Major Planning Applications at Pagham and Yapton

CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

Our members in the Arun District have raised concerns with us that a number of major planning applications may be considered by Arun District Council in advance of the receipt of the Local Plan Inspector's Report, expected in July 2018. We have been told that consideration of the applications, listed below, may be taking place in early June for the four Pagham applications and at the end of May for the two Yapton applications. This concern is reinforced by Planning Performance Agreements on some of the applications which target reporting them to committee for decision in late April.

The applications concerned are:

Pagham

P/134/16/OUT: land north of Sefter Road and 80 Rose Road, Pagham - Outline application for up to 250 dwellings, primary school, open space etc.

P/16/17/OUT: land north of Hook Lane, Pagham – Outline application for up to 300 dwellings, care home, D1 uses, primary school etc.

P/140/16/OUT: land north of Summer Lane and west of Pagham Road, Pagham (part within Aldwick parish) - Outline application for mixed use development of up to 400 dwellings, care home, local centre, primary school, etc.

P/25/17/OUT: land at Church Barton House, Horns Lane, Pagham - Outline application for 89 dwellings

Yapton

Y/91/17/OUT: land at Bilsham Road, Yapton - Outline application for development of up to 250 dwellings

Y/92/17/OUT: land east of Drove Lane, Yapton -Outline application for development of up to 300 dwellings, provision of new link road, surface drainage and open space etc.

We hope that this is not the intention of Arun District Council and that you can confirm that these applications will not be referred for decision to committee until after the Local Plan Inspector has reported and the plan has been formally adopted.

By that time, you will have a freshly endorsed planning strategy for Arun District and know definitively whether, and to what extent, the application sites might play a role as strategic development sites. This will allow planning decisions to be taken with confidence in the strategic planning position, the merits (or otherwise) of the application sites, and policies for the delivery of the necessary supporting infrastructure and environmental protection and mitigation.

If this is indeed the case, we would be grateful if you could confirm to us by e-mail at [REDACTED] that the applications will not be referred to committee in the immediate future.

However, if the applications are to be referred to committee before the Local Plan Inspector has reported, CPRE Sussex wishes to make the following comments, which we would ask you to report to committee when they consider the applications.

1. CPRE Sussex considers that it is premature, and prejudicial to, the local plan process to determine a large batch of major planning applications in advance of receipt of the Local Plan Inspector's Report and formal adoption of the Local Plan. This is because these applications – together totalling more than 1500 dwellings – are so substantial (both individually and cumulatively) that they will pre-empt decisions about the scale, location and phasing of development which are properly determined by the local plan.
2. There are a very large number of unresolved objections to the Arun Local Plan Submission draft March 2017 (856 comments) and the Arun Local Plan Main Modifications (405 comments). These include comments on many matters relevant to the determination of these applications including the overall planning strategy; the scale of future development in Arun District; strategic development sites to meet identified need; and policies for infrastructure investment and environmental protection, management and mitigation.

These unresolved objections include a large number of comments submitted by CPRE Sussex in May 2017 and February 2018. We await the views of the Inspector as to whether this leads to any changes in the draft local plan.

3. It is understood that the Local Plan Inspector's report will be available in July 2018. This is only two to three months away. Whilst we appreciate the obligation on local planning authorities to determine planning applications without unnecessary delay and to sustain a five year supply of land for housing development, we think that these are outweighed in this case by the need to uphold the local plan process, allow proper consideration of unresolved objections to the local plan, and to make decisions on these major planning applications on the basis of a sound planning strategy which has been tested and endorsed by the Inspector.

We note that the four Pagham applications were submitted more than a year ago (December 2016 - March 2017) and the Yapton applications were submitted in December 2017.

4. All six applications raise complex planning issues and have attracted a huge volume of comments from consultees, local residents and businesses. Now that the local plan is at such an advanced stage, with the Inspector's report available soon, we consider that the benefits of determining these applications in the context of an approved local plan clearly outweigh the harm arising from any further delay.

These benefits will include confirmation of a range of planning policies in the new local plan which will bear on both the principle and detail of development on the six sites, including - if planning permission is granted - the scope and content of any planning conditions and legal agreements necessary to secure sustainable development.

Thank you for considering these points. We look forward to hearing from you further.

Yours sincerely



Kia Trainor
Director, CPRE Sussex