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Town & Country Planner

TO: All members of the Arun District Council Development Control Committee
Cc: Karl Roberts ADC Director of Place, Neil Crowther ADC Head of Planning Services,
David Eastham ADC Case Officer, Lorraine Gamble Planning Casework Manager PCU
Ministry of Housing, Communities and Local Government

BY E MAIL ONLY

Planning Application reports P/6/17 OUT, P/134/16 OUT and P/140/16 OUT Development Control Committee 24 October 2018

Dear Member

I act for Pagham Parish Council in this matter.

Representations made by Pagham Parish Council, Bognor Regis Town Council, Bersted Parish Council, North Mundham Parish Council and Aldwick Parish Council regarding their opposition to these proposals are not reported or addressed in the Officers reports and I therefore attach the representation made by Pagham Parish Council on 27 September 2018 for members information and consideration.

Despite repeated requests for clarity and information by all interested parties over many months, the reports now published are littered with inaccurate, imprecise and confusing statements regarding material information, fail to properly assess the proposals against the relevant development plan policies and also fail to properly identify and assess all other material considerations for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Whilst it is clear that the site promoters and Officers have been working hard on these outline planning applications (largely behind closed doors) for the last 22 months in an effort to address the many issues regarding the viability, deliverability and impact mitigation that were left unresolved as a result of the belated inclusion of these Strategic Allocations in the Adopted ADLP 2018, it is clear from these reports, the recommended conditions and the heads of terms for the S106 Agreements, that a resolution of these issues has not yet been achieved and these outline applications (with all matters except for immediate road and pedestrian access reserved) therefore fail to convince, let alone demonstrate, that these schemes will be undertaken in accordance with the relevant development plan policies .

Whilst the promoters have indicated what their sites could deliver by way of the development quantum and components proposed, the outline nature of the applications results in there being no definitive description of what they will deliver and there are no enforceable mechanisms (conditions and/or S106) by which the LPA can require what development quantum or components will actually be delivered. Obviously with mixed

development schemes involving housing and essential onsite and off-site infrastructure like these it is essential that the Authority satisfies itself that it is not only the housing that gets delivered and the scheme promoter and ADC Officers have failed to provide such surety in these reports.

Whilst the promoters seem willing to commit their client landowners to making financial contributions towards critical, essential and high priority site specific and district wide infrastructure, there is (currently) no lawful or enforceable means by which these offered contributions can be collected and there is (currently) no agreement or commitment as to where, how and when these contributions (if collected) will be spent by the recipient service providers so as to deliver that infrastructure.

In short despite these outline applications having been under consideration for 22 months these applications, in reality, do little more than repeat the principles already stated in the Strategic Allocations rather than demonstrating how the schemes they describe will actually deliver those principles in a satisfactory manner on the ground.

However, given the officers and promoters insistence that these applications are determined at this Committee and the fact that so many material matters remain unresolved, Pagham Parish Council consider that these applications should be refused for the reasons stated in the attached letter of representation.

I have circulated this letter to all stated with the request that it be placed on all the relevant files for future reference if required.

Paul Collins 19 October 2018