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Mr L Vallins
Foreman Homes
Unit 1 Station Industrial Park
Duncan Road
Fareham
SO31 1BX
Sent Electronically

11th March 2022

Please ask for:
David Easton
Planning
Direct Line: 01903 737361

Dear Mr Vallins,

**Land South of Summer Lane, Pagham
P/153/21/RES and P/167/21/RES**

I write in relation to the above planning application following our earlier telephone communication regarding the concerns of the Local Planning Authority (LPA). As advised the LPA are concerned with the currently proposed scheme and feel that it requires significant amendment to address these issues. The LPA are willing to allow a period of 8 weeks from the date of this letter for submission of revised documentation. A period of 21 days re-consultation / advertisement will then follow at which point a recommendation will be made.

As such, the revised timeframe for determination of these applications would be as follows:

9th May 2022 – Full suite of revised documentation for an amended layout to address the concerns set out below. Amended documentation to be re-advertised and further consultation undertaken on the revised scheme for a period of 21 days.

6th June 2022 – LPA to have advised of their likely recommendation and set out the timeframe for determination/presentation of the application to Planning Committee as appropriate.

As such, I would be grateful if after reviewing this letter you could provide me with written confirmation of your agreement to a proposed extension of time until the **6th June 2022**.

Whilst, I am sure you have reviewed the consultation responses submitted on this application I thought it would be useful to provide a summary of the points raised which will require consideration. These have been included as Appendix 1.

Comments issues and concerns

Northern Parcel:

Layout

- The layout of the northern parcel is considered to appear overly car dominated. There is an abundance of parking adjacent to the highway, often present on corners with little to no screening.
- Tandem parking is present in a number of areas including the flats which feature a large parking court of tandem parking spaces which is impractical for future occupiers and as such likely to result in additional on street parking.
- Several the dwellings feature tandem parking spaces, and, in some instances, this consists of three tandem spaces in a row. This results in blocks of 6 parking spaces with no separation or pathways provided between the spaces. This is impractical and likely to encourage on street parking especially for those spaces located in the middle.
- When looking at the design code it is difficult to understand how the parking arrangements reflect what has been approved through the design code which states the following for each of the character areas:

Rural Edge (North) - "Off-street courtyard parking. Cars hidden from public view by significant planting)."

Community Streets – "Mix of garage and driveway parking."

Transitional Perimeter (North) – "Mix of driveway parking and parking courts."

- The layout conflicts with the objectives regarding parking for the character areas established through the design code. Car parking has been pushed forward of the building line in almost all areas of the northern parcel and the landscaping and layout of dwellings does nothing to mitigate this.
- House types are repeated and often clustered together with little to no variation which results in a development which is bland and repetitive. This is highlighted in the northern parcel with plots 73-80 and 5-16 where the same dwelling types repeat with no variation in style, height or variation of fenestration or materials. Consideration must be given to how interesting and varied street scenes can be created which are distinct to each of the character areas.

Landscaping

- There is extremely limited green infrastructure or landscaping provided as part of the development. When looking at drawing no. L01 Rev A it is apparent how little landscaping is provided within the street scene. Often the areas of landscaping are awkward in size sitting between or around parking spaces, it is unclear how these spaces are intended to be used or what function they serve in the wider development.

Southern Parcel:

Layout

- The southern parcel in general is more successful than the northern parcel in terms of layout and parking arrangements (this is not to say that there are no concerns). The lower density has allowed for a looser grain of development with parking better accommodated between dwellings with the majority pulled back behind the building line and larger areas of landscaping present to mitigate where parking does extend forward of the building line.

- However, there remain areas where car parking still feels overly dominant within the southern parcel. This is primarily within the NE corner where parking provision is almost exclusively provided forward of the building line through perpendicular parking spaces
- There are again examples within the southern parcel of 3 tandem parking spaces with no paths or separation between the spaces which serve plots 340-341 and 346-347. As identified above this is poorly designed and is likely to result in additional on street parking due to the impracticality of accessing vehicles with car seats or small children.
- The parking arrangements on the northern section of the western boundary where the parking arrangements result in 6 spaces clustered together. This visual impact is further exacerbated by virtue of the spaces extending forward of the primary elevation which in conjunction with the dropped kerb necessary to facilitate access to the 4 aligned parking spaces will result in significant areas of hardstanding. Especially with the absence of any significant on street planting or landscaping to mitigate this design choice.
- The variation in house types is also poor on the southern parcel. This can be seen with plots 203-207 where there are 5 identical houses with identical parking arrangements. It is not considered that the variation of materials in this case will provide sufficient variation or interest within the street scene. This is also an issue on the western boundary as well as on the southern boundary adjacent to Pagham Road where the same dwelling type is repeated 9 times in a row.

Landscaping

- As was the case in the northern parcel street planting remain limited, but some areas are better than others. However, there remain areas with extensive perpendicular parking forward of the building line with little to no landscaping to soften or mitigate these parking arrangements.

General Comments:

Scale

- Concerns exist regarding the scale of the development proposed when it is considered alongside the proposed land raising of up to 1.5m. This issue is exacerbated by some of the design choices for dwellings where 1.5 storey chalet bungalows are of sufficient height to appear as two storey dwellings on the rear elevation. Consideration must be given to the scale of the proposed development in conjunction with the proposed land raising to ascertain what impact this approach will have upon the character of the locality. Especially, given this is an edge of settlement site which should respect its rural character.

I hope that the above has provided an overview of the concerns held by the Council to assist with the review and amendment of the proposed development. It would be appreciated if you could provide confirmation of your agreement to the proposed timescales for determination of these applications.

The Council are happy to assist throughout the design review process through input and meetings and as such it would be useful if you could advise of your initial availability to meet and discuss how you intend to take this matter forward. If you wish to discuss the contents of this letter, or if there is anything you wish clarified, please do not hesitate to contact me.

Yours Sincerely,

David Easton
Principal Planner

Appendix 1 - Consultation Summary

West Sussex County Council Highways

- A stage one road safety audit is required due to the presence of the school. This should be provided.
- WSCC have questioned the need for a 7.3m wide road in front of the school as this is at odds with the 20mph design speed. However, very limited consideration has been given to the potential demands arising from the school site or the need for school safety zone features. Such elements should be incorporated into the design.
- The road serving plots 253-258/267-270 is questionable given the number of dwellings served. Refuse vehicle tracking is also absent for this road. The road width should be increased.
- At all points where, shared surfaces integrate with traditional segregated footway/carriage ways a length of footway should be continued into the shared surface to avoid conflict.
- A contrasting material to that use in traditional carriageway must be used for shared surfaces. Tarmac should not be used in shared surfaces. There is a large area of shared surface in the southern phase which is indicated to be in tarmac rather than blockwork.
- Materials could be rationalised. It is unclear why driveways and unallocated parking spaces within the carriageway are in block paving whilst the road is tarmac. Should adoption be intended WSCC would seek the use of tarmac for driveways and layby spaces where the adjacent highway is also tarmac.
- A footway should be provided across the frontages of plots 182-183 and 202-207 to accord with the design code.
- Some raised features are located in seemingly random location (e.g. outside plots 244, 229 and 349). There are also some within shared surface areas, given that shared surfaces are intended to restrict vehicle speeds through layout the presence of raised features is unnecessary. There is also inconsistency with how raised features are used at some but not all junctions. The overall use of raised features should be reviewed and amended accordingly.
- The cycle route which runs from Pagham Road through the southern parcel and onwards into the northern parcel should be delivered as a shared surface rather than segregated facility.
- The approved design did not consider cyclists as part of the access design and as such didn't include specific provision for cyclists that may be wishing to join or leave the proposed route within the development. Consideration needs to be given to the integration of the cycle route with Pagham Road. This may impact upon the approved southern access design. Alternatively, the cycle route could terminate within the development rather than at Pagham Road.
- The site plan indicates two additional pedestrian access points onto Pagham Road (one in front of plot 344 and another at the very southern edge of the development). The inclusion of these additional access points are not necessarily an issue, although the need for the new southern access is perhaps questionable. There would still need to be consideration as to how pedestrians using these then access the wider highway network. The applicant should consider this and provide further pedestrian crossing infrastructure.
- Parking is understood to comply with the ADC Parking Standards although different numbers are quoted in the Planning Statement and Transport Statement. The exact number of parking spaces should be clarified. It is also unclear if the scheme proposes any disabled parking spaces; 5% of all spaces should be designed to meet the requirements as specified within Manual for Streets. A plan showing the location of electric vehicle charging for those proposed that do not have a driveway or garage should also be provided.
- Although indicatively indicated on the Site Plan further detail is needed for the northerly access into the adjoining phase at Church Barton Farm (P/25/17/OUT). Tracking should also be provided from the accesses into this adjoining phase of development.
- Quality of scanned images in the transport statement is poor. It would be useful if clearer images could be provided.

Ecology

Bats - We would request that the scheme provide information to satisfy us that the following principles have been addressed:

- All luminaires should lack UV elements when manufactured.
- A warm white spectrum (ideally 2700 Kelvin) should be adopted to reduce blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.
- The use of specialist bollard or low-level downward directional luminaires can be considered. However, this often comes at a cost of unacceptable glare/poor illumination efficient and poor facial recognition and their use should only be as directed by the lighting professional. Column lights should be carefully considered to minimise light spill.
- Only luminaires with an upward light ration of 0% and with good optical control should be used.
- Luminaires should always be mounted on the horizontal.
- Any external security lighting should be set on motion sensors and short 1 min timers.
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct to where it is needed.

Net Gain – Satisfied that the biodiversity enhancements recommended within the Ecological Survey Summary Report (2021) are suitable and should be incorporated into the landscaping scheme. This should be submitted prior to determination.

CEMP and LEMP – Details on how habitants and enhancements onsite will be managed during construction and post construction should be included within the CEMP and LEMP and submitted prior to determination.

Affordable Housing

We object to the application in the current form as we would anticipate a more equitable distribution of the affordable homes. **No clusters which total more than 10 dwellings.**

Environmental Health

- Contaminated land condition requested. Including condition for unexpected contamination.
- Consideration must be given to air quality issues. As per NPPF air quality should be considered at the design stage and incorporate appropriate and effective mitigation.
- Internal noise level of residential units to accord with guideline values specified within Table 4 under section 7.7.2 of BS 8233:2013.
- Occupancy before development completion should ensure details of hour amenities of future residents will be protected during construction.

Engineers Drainage

Holding Objection

1. The proposed discharge rate is too high. The calculation of discharge rates should be based upon the positively drained area. Revised greenfield runoff rate calculations should be supplied.
2. Ordinary watercourse land drainage consent is required for all new outfalls and for proposed culverts.
3. FEH2013 rainfall data must be applied to calculations.
4. Surcharged outfalls should be applied to calculations. The surcharged outfall levels should be set to adjacent top of bank level.
5. A minimum of two perpendicular cross sections per basin must be supplied.
6. We note that several trees are proposed in close proximity to drainage features. Root potential areas must not conflict with surface water drainage features.

We would also like to highlight that the full winter groundwater monitoring will be required, even for an attenuation scheme. Peak groundwater level at attenuation features should be established and used in design to evidence that flotation is adequately accounted for in design.

Heritage

I am of the opinion that the application documents do not include the required heritage information, and as a consequence, do not meet the requirements of the NPPF. I am particularly surprised given that the outline application for the site was the subject of a Judicial Review regarding the assessment of the heritage assets! This heritage information should be submitted during the lifetime of this application and be prepared by a suitably qualified specialist. Failure to provide this information will mean that a thorough assessment cannot be made.

Pagham Parish Council

- Views of St Thomas A Becket Church are not respected.*
- Design is very poor – properties boxy and unimaginative. Cladding and tile hanging do not alleviate the similar appearance of units. Too much red brick and buildings too high.*
- Little frontage between dwellings and the road in some areas. Many areas appear cramped and over developed.*
- Lack of respect for the village design statement.*
- Proposals to raise land by 1.5m in some areas impacting on the landscape.*
- There are no bungalows fronting onto Pagham Road.*
- Insufficient information as to how the allotments will be laid out or where parking will be located.*
- Comments regarding Brent Geese mitigation land which falls outside the scope of this RM application and will be controlled through discharge of the relevant condition.*
- Drainage as proposed will not work.*