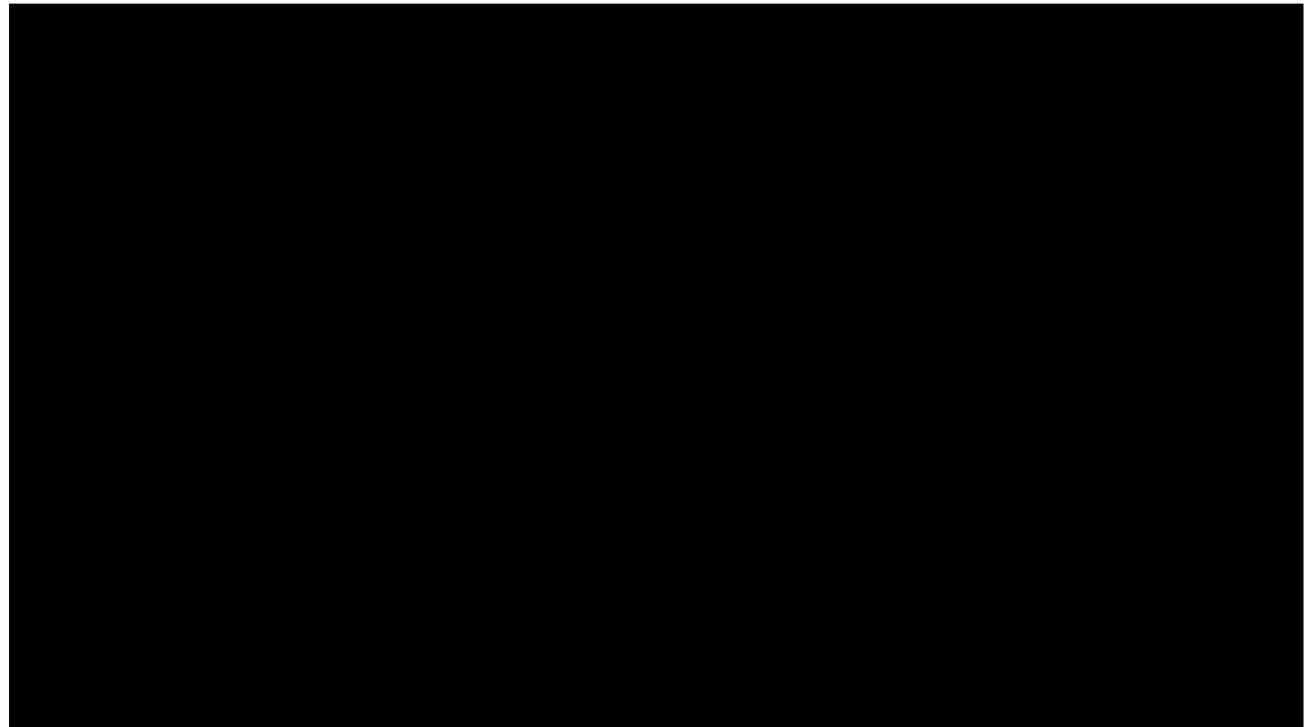
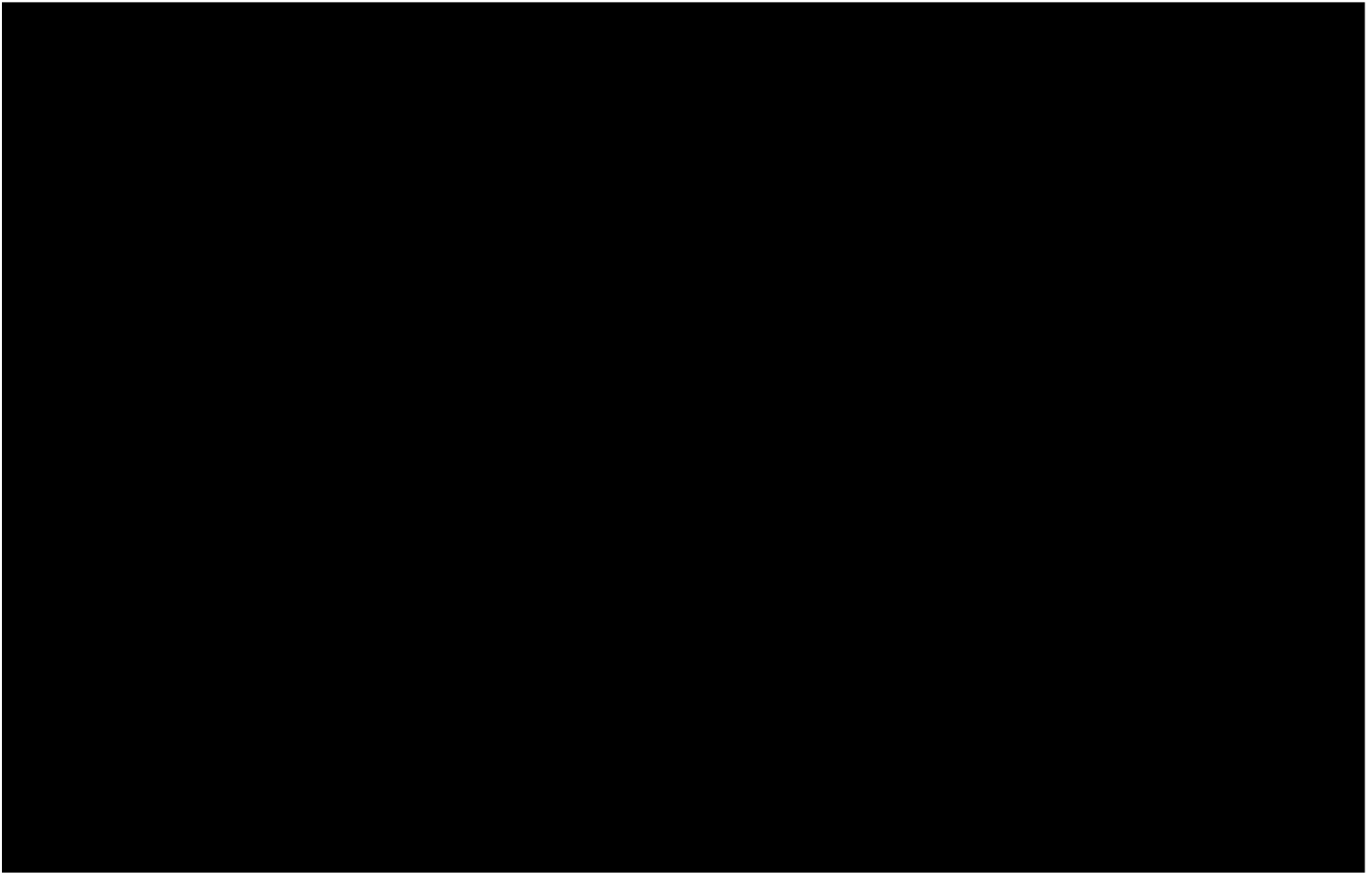




From: Jane Preece [REDACTED]
Sent: 01 February 2022 18:37
To: Planning <Planning@arun.gov.uk>
Subject: P/178/21/OUT Land West of Pagham

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OBJECTION

See Page 49 of the ALP 2018, *'The Council will take into account cumulative impact of development in the consideration of planning applications'*.

Developments currently proposed for the immediate area are 1025 with another 147 already built or underway. Another 106 makes a total of 1278 being absorbed into a village of approx. 3,600 homes, that is an increase of just over 35%.

The 2018 HELAA Assessment Summary Table lists this site as Not Developable. Under Suitability it says it is contrary to policy as immediately adjacent to BUAB and within Settlement Gap, therefore not a suitable site. The site was promoted in 2020 HELAA update – so it was considered available but the status at that time was - Not Currently Developable. What has changed? This development is **Contra to ADC Plan Policies SD SP1 Strategic Development and SD SP1a c, f, h, j Strategic Approach**

Built Up Area Boundary

New housing outside the existing built up area will cause landscape and visual harm and lead to the coalescence with Chichester. This development cannot be assimilated into the landscape without causing a detrimental effect on the countryside. The Built Up Area Boundary for the village was amended in the adopted ADC Local Plan of 2018 to include the Hook Lane and Sefter Road developments coming forward. This field was not included within that boundary change. How many times must the lines be moved or ignored to accommodate a new planning application coming forward. The boundary should be adhered to, if ignored when not convenient the Plan and Policies within it becomes a mockery and any boundary will be irrelevant. Policy Map 3 (West) Sept 2018.

This application is **Contra to ADC Local Plan Policy SC SP2 Built Up Area Boundary**

The development does not meet any of the criteria for development to be permitted outside the BUAB which is considered countryside and would be **Contra to ADC Plan Policy C SP1 a – f. Countryside**

Biodiversity Opportunity Area

This development is next to a Biodiversity Opportunity Area and within the Settlement Gaps of Pagham/Selsey and Pagham/Chichester. In the surrounding area, especially along the western boundary, deer, kites, buzzard, curlew and other wildlife has regularly been witnessed. Much of the wildlife is alongside the hedgerows, watercourses and associated riparian zones which support the movement of species and are necessary to maintain biodiversity. Recreational disturbances will impact on this habitat, due to an increase in noise from walkers, dog walkers, cars, cyclists and light pollution.

Settlement Gap

This development will be within the Settlement Gap between Bognor and Chichester which should be protected to prevent coalescence and to retain their separate identity. The line has been drawn by Arun and if ignored it will undermine the necessity of the gap and the integrity of the Local Plan. If this application is approved a precedent will be set to permit developments to extend into all gaps. It does not meet the criteria for development to be permitted. This development is **Contra to ADC Plan Policy SD SP3, a-e. Gaps Between Settlements**

The development will not protect the landscape character and enhance the natural features of the area, it is housing in countryside with a loss of views. The dismissal of low lying Park Homes to the south of the development and Hallam's comments that it is a 'visual intrusion' shows their disdain for the surrounding area and its residents. Mill Farm properties are currently valued at approx. £75million and it has a distinct character and appeal. The style of

housing proposed is not in keeping with local area particularly Park Homes, the barn conversion and Rookery Farm along the northern boundary plus Barfoots Packing area further north. The insertion of vegetation, although very nice will be there to hide housing. A view over countryside and open space is good for everyone's mental health and sense of wellbeing and cannot be replaced. This development is **Contra to ADC Plan Policy LAN DM 1 Protection of Landscape Character**

Greenfield/Agricultural Land

The field is greenfield and is grade 3a, 3b good to moderate agricultural land which is currently growing crops. The UK is currently importing just over 50% of its food and feed whereas 70% and 64% of the associated cropland and greenhouse gas impacts, respectively, are located abroad. EU countries continue to be the main source for FFD imports and has been around 70% and are therefore essential to the UK's food security. It has yet to be seen the impact that Brexit will have on this trend.

Figures from the National Farmers Union released in 2017 suggest that by the mid-2040s, this country will be only able to produce enough food to feed 53% of its population. The area of West Sussex is the centre of food production as it gets more sunlight than anywhere else in the UK, an average of 1902 hours per year, and is often able to harvest more crops per field in one year. We should not lose valuable growing land that can never be replaced.

Pagham Road

The development will be exiting onto the Pagham Road which is already one of the most dangerous B roads in the county. The proposed junction will be opposite the existing Hook Lane junction and a proposed new junction being created for 280 homes within the Hook Lane development. The local roads to the south and north of the site are not relatively lightly trafficked, as stated in Hallams Design & Access Statement and are certainly not suitable for cyclists. Three junctions in such close proximity, no visible footpaths or walkways, no street lighting and in an area where traffic should be approaching the 30mph but usually not, will create serious traffic and pedestrian problems.

Flooding along the Pagham Road has already been highlighted with surface water run-off from fields creating large pools of water along the Pagham Road, much of which is hiding deep potholes and erosion of the road edge. The recent 'patching up' is a quick fix but does not go far enough to ensure safe driving conditions. Many of the verges along this road towards Chichester are worn away and disappear into deep ditches. The HGV traffic is constant for 7 days a week and is a major source of wear along the edges, the Pagham Road was not built for so many large vehicle movements and it creates a hazardous surface particularly for cyclists. There will be a cumulative impact of traffic from adjacent proposed developments of another 5-600 homes, onto a road which is already not fit for purpose for anyone wishing to travel in or out of the village. It will be extremely dangerous area for cyclists and for any pedestrians wishing to cross the road. This development is **Contra to T SP1 a,b & c Transport & Development**

Sewage

ADC Plan 2018 has already highlighted issues at Lidsey Sewage Treatment Works stating there will be a cumulative impact from developments for foul water disposal, flood water storage and surface water drainage. Southern Water has stated that up to 2017 they were only able to cater for up to 1,000 new homes and to deliver any more would require investments to improve headroom, a Plan which was being developed for delivery 2020/25. In 2017 they were only able to cater for a maximum of 400 new homes under its permit before impacting on water quality in Pagham Harbour. Pagham Wastewater cannot cater for the 1,200 in the Local Plan without expanding this treatment facility. Its catchment area covers North Mundham, Hunston, Runcton and Lagness as well as Pagham and Nyetimber. 'Spills' into the Rife of unprocessed wastewater at times of heavy rainfall is of significant concern and adding new homes will certainly compound the problem. Why is no one taking action to monitor the performance of Southern Water in the immediate area? This is **Contra to ADC Policy INF SP1 Infrastructure Provision & Implementation**

Southern Water has again stated that there is inadequate capacity to join the 150mm sewer along the Pagham Road for this development. Their consultation replies for other sites have also indicated that there is insufficient capacity for most of the developments coming forward although they have a duty to provide sufficient capacity to meet development growth. *I would like to know if Southern Water have also carried out a survey to assess the impact of surface water run-off on Pagham sewer system. Can they confirm their infrastructure upgrade will be sufficient for

connection and of sufficient capacity to handle the cumulative impact of this and proposed new developments coming forward of an additional 1278 homes now and possibly more in the future?

This development is therefore **Contra to ADC Plan Policies WDM 1 , 2 a,b and WDM 1 – 3 Water Supply & Quality**

Flooding

Reference Brooksbank Flood Risk Assessment document, section Regional Policy, item 3.9. The site is situated in the Chichester and Lower Chalk Streams catchment which is covered by Policy 4 of the Catchment Flood Management Plan. The policy will tend to be applied where....the risk of flooding is expected to significantly rise in the future. **Arun has identified that the site is partially located within an area of future flooding (future FZ3a) as defined in their Level 1 SFRA 2016 (Climate Change Mapping).**

There is no mention in the 2008 Arun District Council Strategic Flood Risk Assessment, Level 2 Detailed Site Summary Tables for this development site or for Summer Lane, Spinnaker View, Church Barton and The Inglenook developments. This document should be reflective of the current climate and of new developments being considered if it is to be used to support planning decisions. This development is therefore **Contra to ADC Plan Policy WDM 2. Floodrisk**

The River Lavant Flood Alleviation Scheme also plays a big part in any flood discussions and its impact on the Pagham area if it goes live in an extreme weather event, as any excessive rainwater is diverted from Chichester to the outfall structures at Pagham Harbour, via the Forebridge and Pagham Rife as happened in 2012.

The Pagham Rife is in danger of bursting banks during heavy rainfall as a result of inadequate de silting or reed management/removal and riparian responsibility for clearing and maintaining ditches is sporadic and not being enforced. All ditches run to the Rife's and to the sea, any additional run off will impact on the surrounding land.

Living on a coastal plain means the land is flat and the water table is very high. Drainage of surface and ground water to the sea is slow, even more so at times of major weather events, via these network of rifes that are tide locked twice a day. The South Downs to the north also sheds water southwards towards the coastal plain and sea.

**Southern Water have stated in 2017 that none has been carried out.*

Part of the Mill Farm Licence requirement was the construction of a bund costing £1.5 million pounds to surround the site to prevent sea incursion and flooding. Summer Lane and Spinnaker View developments and its documented problems with drainage and surface water run off being sent to the western boundary ditch alongside Mill Farm plus Arun's reluctance to consider its impact on our Park Home site has been a serious worry for local residents. Therefore, a development to the north of the estate with potentially similar problems of drainage and being partially in an area of future flooding could add to the issues of effectively managing the surface water run-off and we will be seriously compromised from three sides of our Estate. This development is therefore **Contra to ADC Plan Policy W SP1 a-c. Water**

Infrastructure

There is a serious lack of existing infrastructure, roads, Dr's, Dentists, St Richards NHS and education are nearing or at capacity for the area. Pagham children are underrepresented in WSCC's Projected School Places (2017) and a local school does not appear to be forthcoming any time soon, which would therefore require our children to travel out of area, creating more traffic on the already overstretched Pagham Road. This development will add to the overstretched infrastructure issues and is therefore **Contra to ADC Plan Policy INF SP1 Infrastructure Provision & Implementation**

The loss of greenfield and countryside is a disaster for the District, it can never be replaced. We need to build the right homes in the right place, which local people can afford and that has the infrastructure in place prior to any development or expansion of the village.

I urge the Committee to refuse this application to protect the Village of Pagham from overdevelopment and if refused the reasons are watertight and cannot be overturned by the Planning Inspector at any future appeal.

Jane Collins

Chair

Mill Farm Residents Association