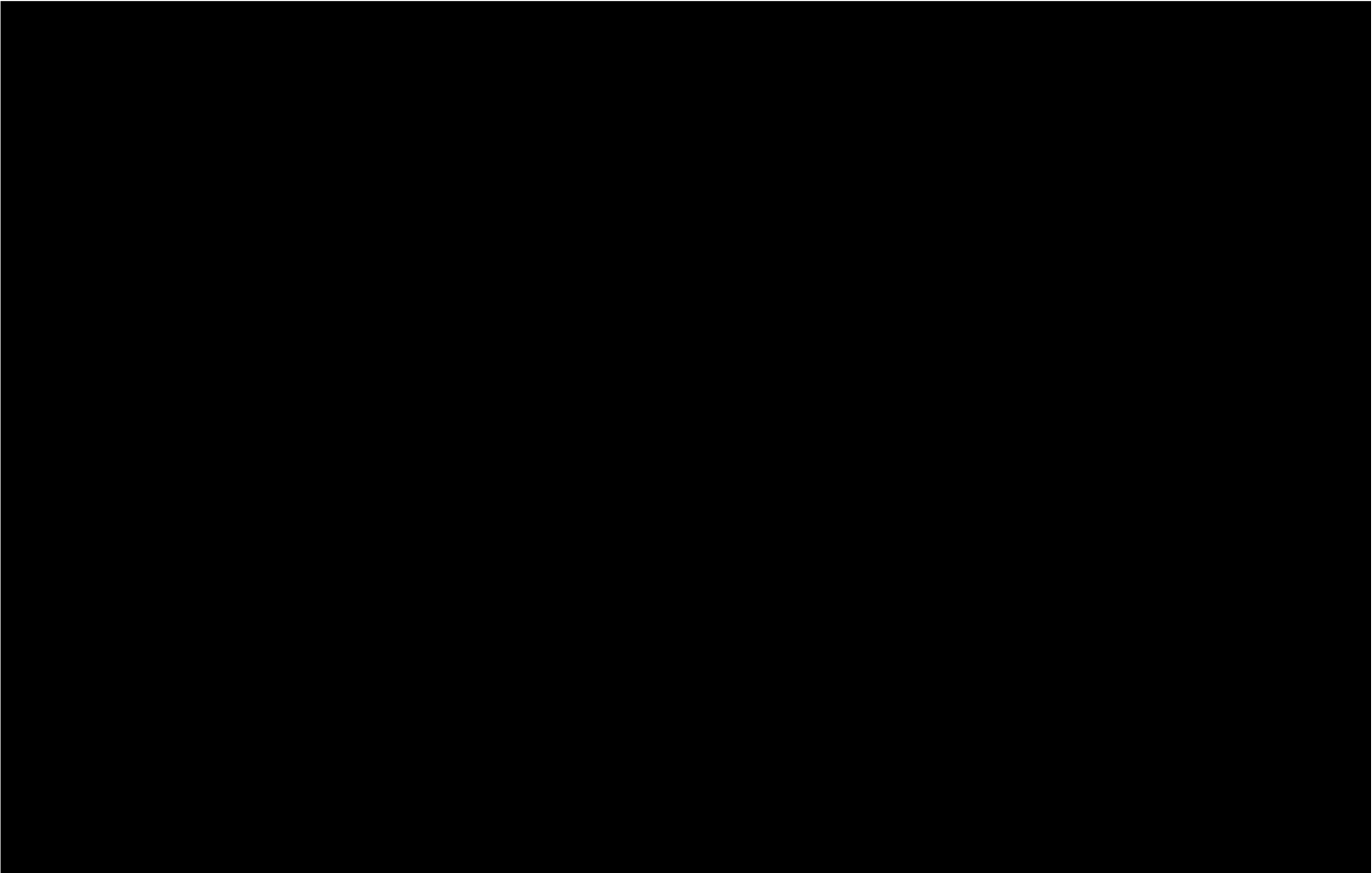




From: Nicola Swann [REDACTED]
Sent: 09 February 2022 13:04
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Pagham responses

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Pagham Parish Council considered the following applications at a meeting of its Planning Committee Advisory Committee on 8th February 2022. In accordance with a scheme of delegation dated 4th May 2021, the Clerk submits the following comments on behalf of the Council:



P/178/21/OUT – Outline application with all matters reserved (except access) for the construction of up to 106 new homes, formation of access onto Pagham Road, new pedestrian and cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features and associated groundworks and infrastructure. This application is a Departure from the Development Plan and may affect the setting of a Listed Building. OBJECT for the reasons set out in the attached document, which should be uploaded to the Planning file.

Best wishes



Nicola Swann
Clerk & RFO
Pagham Parish Council



P/178/21/OUT - Outline application with all matters reserved (except access) for the construction of up to 106 new homes, formation of access onto Pagham Road, new pedestrian and cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features and associated ground works and infrastructure. This application is a Departure from the Development Plan and may affect the setting of a Listed Building. Land West of Pagham Road Pagham

Pagham Parish Council wishes to OBJECT to this application for the following reasons:

No requirement for housing in addition to approved schemes

Pagham Parish Council does not agree with Hallam Land's assessment that these houses are required in order for strategic sites SD1 and SD2 to deliver their target cumulative number of homes (1200).

The numbers quoted are from the outline planning permissions, however since this time reserved matters applications have been approved which would ultimately deliver more than 1045 homes calculated in Hallam Land's Planning Statement. This is not the complete picture.

Hallam Land will be aware, having submitted the reserved matters application P/132/20/RES in relation to the Hook Lane site, the area allocated under P/30/19/OUT for an 80 bed care home and 4000m² D1 uses including a two form entry primary school was excluded from the reserved matters application. Permission for 300 homes on the remainder of the site was granted. It is noted that the care home is expected to be delivered separately, but the land earmarked for a school is expected to be developed as more homes. P/132/20/RES and this application are made on the basis that a school will be provided on the Pagham South site.

Similarly, at the Sefter Road site, land earmarked for a one form entry school was excluded from the reserved matters application P/49/21/RES. This land will revert to housing if it is not used for a school.

Overall, the two school sites release 1.45ha of land where housing can be built. Taking the same density of housing as is assumed for this application, an additional 49 homes can be delivered.

No account has been taken of the care homes at Pagham North or Pagham South, which 150 beds between them. NPPG (para. 043, ref. ID: 3-043- 20180913) states that local planning authorities should 'count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement'. This has not been factored in in this case. Figures to calculate the appropriate ratio were not readily available to the Parish Council on the ADC website, however applying an estimated ratio of 1.8 would add a further 82 homes to the calculation.

In addition, there are two windfall sites at The Inglenook and Sefter Road delivering 9 and 6 homes respectively. In total, this delivers 140 further homes leaving a "shortfall" against the 1200 homes of just 9. To deliver 106 homes on this site is therefore unnecessary.

Building in the strategic gap/suitability

Given the foregoing, there is no need to build in the strategic gap. The developer makes reference to the inclusion of the site in a previous version of the Pagham Neighbourhood Plan. This inclusion was in the context that the strategic sites in Pagham were not built on; and remained green infrastructure. Any decision to include it in the Neighbourhood Plan must be read in context. The version of the plan referred to was not taken forward.

Mill Farm Estate would be very much impacted by the development. The design and access statement refers to the estate as a static caravan park. This is misleading – it is a park

home estate and very much part of the Pagham community. Residents are often elderly and have chosen to live in single storey accommodation. In recent years, two storey housing has been permitted in the vicinity, often overlooking these properties. To add a further estate on the remaining “open” side of the estate would be unfair and unreasonable.

Lack of infrastructure

Pagham does not have sufficient infrastructure to support this development.

Doctors/dentists are oversubscribed and are facing huge pressures from the expected influx of new residents from the strategic sites. Concern has been expressed at the Pagham and Aldwick Advisory Group regarding the CCG’s proposals to increase capacity at Grove House surgery with warnings from Aldwick Parish Council that this is not a practical solution.

Roads are already congested, with unacceptable journey times, particularly during rush hour.

Failure to comply with Interim Planning Statement February 2021

There is a big reliance in this application on other sites delivering infrastructure improvements. Realistically, this infrastructure is unlikely to be ready to serve this development if it is to be delivered within 5 years. The Interim Planning Statement from February 2021 state that “*Sites should not, for example, be dependent upon delivery of significant off-site infrastructure which would prevent them from delivering completed dwellings within 5 years;*”. This site is wholly reliant on other sites to deliver schools, doctors and highways improvements to facilitate pedestrian access to the Village Centre. This application therefore fails that test.

The application makes much of the failure of the Local Plan to deliver on the various strategic sites across the district, and yet it places full reliance and faith on the ability of the Pagham North and South sites to deliver. At the time of writing, Pagham South has outline permission only.

It is noted that this is an outline only application. The interim statement encourages full applications and asks that “*sites of over 50 units up to 300 dwellings (i.e. Non – Strategic Scale development) may also be considered where they are ‘deliverable’ but are likely to be hindered by infrastructure delivery and mitigation of impacts, requiring demonstrable evidence that these are resolvable to deliver site housing within 5 years.*”. There is no demonstrable evidence of how any of the infrastructure issues would be dealt with in this application.

Flood risk

The Parish Council is very concerned that the development will not be able to adequately deal with the flood risk on the site. The existing neighbouring properties are riparian owners of the ditches which serve the site and must be consulted and involved.

Pagham Waste Water Treatment Works is in need of an upgrade to cope with current demand let alone the demands of an additional 1200 homes. Whilst we are reassured this will happen, residents have little faith in these promises given SW’s track record. Arun District Council’s own drainage experts are unconvinced by the proposals for this site, and additional information has been requested by the Environment Agency as the land was misclassified by the developer.

Information has been supplied by the developer in its Service Supply agreement that indicates that Pagham WWTW has headroom for an additional 734 properties. This fails to give the full picture – Southern Water make it clear that “*It does not take specific account of additional housing permissions, but is based on actual flows so will include flows from any housing already built*”. No account is taken of any additional permissions in Arun or Chichester districts that will be connecting to this WWTW.

Delivers nothing to the community

The developer makes much of their community engagement process. However, the Parish Council were not consulted other than by way of direction to the dedicated website. Given

the history of the Council's opposition to other sites in the village, it would surely have been more appropriate to approach the Council to discuss the matter. We note that there are no benefits for existing residents from this development.

Involves construction of another entrance onto Pagham Road

Pagham Parish Council is concerned about another entrance being created onto Pagham Road. We do not think it is safe to add to the number of cars pulling out onto Pagham Road.

Pagham Road not suitable for current pedestrians and will not be sufficiently improved by this or other developments

We are concerned that this application places reliance on the existing pavement network to allow residents to walk to the nearby shops/bus stop. Anecdotal evidence from those who currently walk on the paths near the development site have told us that they are unsuitable. It should also be borne in mind that workers from Barfoots of Botley who live in mobile home accommodation on their site frequently use the field as a cut through to access the pavements to access the village.