



The countryside charity
Sussex

Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG

Planning Department
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF
By email: raymond.cole@arun.gov.uk

21st May 2020

Dear Mr Cole

P/24/20/RES Land North of Sefter Road & 80 Rose Green Road Pagham. Approval of Reserved Matters pursuant to condition 1 (Reserved Matters details), condition 6 (Design Code Masterplan) and condition 7 (landscaping and layout details) following the approval of Outline planning permission P/134/16/OUT for the erection of 280 dwellings, (including affordable homes), replacement scout hut & Ambulance Community Response Post Facility; provision of a primary vehicular access from Sefter Road; demolition of No. 80 Rose Green Road & creation of a pedestrian & emergency only access; provision of Public Open Spaces including associated children's play areas, landscaping, drainage & earthworks. This application also lies within the parish of Aldwick. This site falls within the Pagham North SD2, CIL Zone 1 (Zero Rated).

CPRE Sussex objects to this application on the grounds that it does not comply with Policy ECC SP1 Adapting to climate change or with the draft Arun District Design Guide.

Policy ECC SP1 says "The Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity.

In order to achieve this, development must be designed to take account of the following issues:

- a. Location (in relation to flood risk and vulnerability to coastal erosion);
- b. Water efficiency;
- c. Shade, cooling, ventilation, solar gain;
- d. Connectivity to the green infrastructure network;
- e. Layout and massing;
- f. Resilience of buildings and building materials to extreme weather events; and
- g. Capacity of drainage systems and incorporation of Sustainable urban Drainage Systems (SuDS)

The Arun District Design Guide Supplementary Planning Document, Consultation Draft January 2020 sets out Key Design Objectives “which provide a basis for the guidance contained in this document. These objectives must be understood at the earliest stage and continue to inform thinking throughout the design process”. These objectives include:

“Efficient Use of Natural Resources

Make good use of the natural and built environment, conserving and improving it as required. The layout and design of buildings and planting can reduce energy and water use and mitigate against flooding, pollution and overheating, as well as reducing the need for heating in the winter”.

“Innovation

Encourage appropriate innovation in construction techniques, design and technologies, including modular housing which enhances and adds to the existing character of the area, and the performance, quality and aesthetics of a scheme”.

“Climate Change & Sustainability

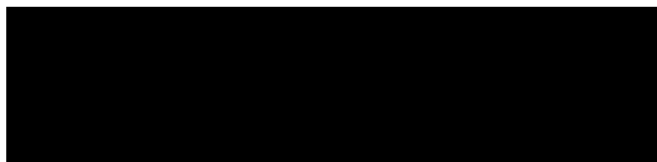
Mitigate and adapt to climate change through energy efficiency, renewable energy, passive solar, wind, geothermal and micro generation technologies, and infrastructure provision including electrical vehicle charging and Combined Heat and Power (CHP) networks”.

From reading the Planning Statement, the Design and Access Statement and the Design Code it is clear that the design process has focused on the visual aspects of place-making , with some attention given to the provision of open space and sustainable drainage systems. The Energy Report addresses how the design could achieve compliance with condition 28 of the outline consent which requires that 10% of the energy requirement is met by renewable energy and provides some information on reducing energy requirements. However, there is no mention of water efficiency; the use of shade, cooling, ventilation, solar gain; or the resilience of buildings and building materials to extreme weather events (criteria b, c and f of Policy ECC SP1). Neither is there any explanation of how the design of the development will reduce water use and overheating. There is no innovation in construction techniques and there is no explanation as to how the development would mitigate and adapt to climate change. The design therefore does not comply with the guidance in the Arun District Design Guide.

On 7th November 2019 Arun District Council declared a Climate Change Emergency and committed to considering and incorporating the impact and mitigation of climate change into

all policy and key decision making, and to make the activities of Arun District Council carbon neutral by 2030. This will only be achieved if the requirements of the Local Plan and Design Guide on sustainable design are applied rigorously to development proposals.

Yours sincerely,



Kia Trainor
Director, CPRE Sussex