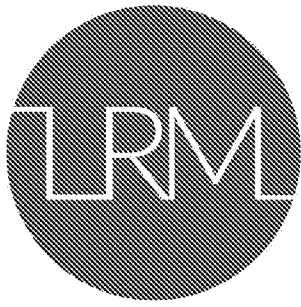




LRM
PLANNING
LIMITED

PLANNING STATEMENT

HOOK LANE, PAGHAM

On behalf of Hallam Land Management

March 2019



Report Control

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Client: Hallam Land Management

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LIST OF APPENDICES

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1 Introduction

- 1.1 This planning statement accompanies an outline planning application submitted by Hallam Land Management Ltd (HLM) for development of land west of Hook Lane at Pagham.

The Proposed Development

- 1.2 The submitted application seeks planning permission for the following proposed development:

The construction of up to 300 new homes, a care home of up to 80 beds, D1 uses of up to 4,000sq.m including a 2 form entry primary school, the formation of new means of access onto Hook Lane and 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.

- 1.3 Matters not reserved for subsequent approval relate to vehicular access from Hook Lane and Pagham Road.
- 1.4 The Development Framework Plan (Drawing No. 167-P-006-D), included at Appendix 1, provides a pictorial explanation of the proposed development. This is the controlling plan which will govern the preparation of subsequent reserved matters applications.
- 1.5 The Application is a duplicate of that which was submitted in January 2017 referenced P/6/17 as amended. This application was refused planning permission on the 24th January 2019. The Council's Development Control Committee decision, which alleged that the proposed development did not accord with Policy T SP1, was contrary to the advice of its Officers, advisors appointed by the Council independently to consider highway matters, West Sussex County Council as Highway Authority and Highways England. An Appeal has been lodged in respect of this.

The Application Site

- 1.6 The 17.5ha site is located within the settlement boundary defined by the recently adopted Arun District Local Plan and is contiguous with the urban edge at Pagham as illustrated at the Site Location Plan (Drawing No. 167-P-001, Appendix 2). The site comprises arable land with periphery hedgerows and tree groups.
- 1.7 Hook Lane forms the eastern and south eastern boundary with existing residential development at Drift Lane and the wider environs beyond. The site is well contained on the northern and western boundary by Sefter Lane and Pagham Road respectively.
- 1.8 In the wider context, the site is well related to the surrounding residential development to the east.

Justification for the Grant of Planning Permission

- 1.9 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 1.10 In this instance, the Development Plan comprises the Arun Local Plan which was adopted July



2018. In all material respects this an up to date Local Plan. This sets out a spatial vision, objectives and a sustainable strategy for delivering growth in the District over the period 2011-2031. Within the Local Plan, the application site is allocated as part of a strategic site through Policy H SP2 – Pagham North.

- 1.11 The National Planning Policy Framework's (NPPF) is a material planning consideration. Its Presumption in Favour of Sustainable Development is engaged. Paragraph 11 of the NPPF states that development proposals that accord with an up-to-date development plan should be approved without delay.

EIA Screening

- 1.12 The Applicant submitted a Screening Request pursuant to Regulation 5 of the Environmental Impact Assessment Regulations 2011 (as amended) on the 1st April 2016.
- 1.13 By letter dated 25th April 2016, in response, the LPA, having taken into consideration relevant factors and having particular regard to the nature and scale of the proposal, formed the opinion that the proposed development does not have the potential to result in significant impacts on the environment. As such, the LPA did not consider that the proposed development constituted EIA development and as such no Environmental Statement is required in this instance.
- 1.14 The scheme for which planning permission is sought is not materially different to that which was scoped.
- 1.15 However, in recognitions of other development proposals in the Pagham area that also forms part of the Local Plan - land at Pagham Road/Summer Lane and land north of Sefter Road – the cumulative environmental and infrastructure effects of this scale of development and the cumulative effect has been considered. This has considered mitigation for inter alia, the effect of education provision, local highway improvements, and the ecological value of Pagham Harbour.

Application documentation

- 1.16 To complement the submission of this planning application an extensive suite of supporting documents has also been provided. This documentation is listed at Appendix 3.

Planning Statement

- 1.17 This document provides an overarching statement which explains the nature of the proposal, the framework provided by relevant tiers of planning policy and the scheme's compatibility with the Development Plan and other planning policies including the NPPF. In doing so, it provides the justification for a grant of planning permission having regard to the Development Plan and other material considerations.
- 1.18 In terms of its structure, this statement is comprised of the following:
- Section 2: describes the application site and surrounding context;
 - Section 3: provides details of the proposed development and its components;
 - Section 4: provides relevant information as regards to the Development Plan;
 - Section 5: explores material planning considerations as they exist in this instance;



- Section 6: provides an outline of the planned implementation strategy and infrastructure delivery; and
- Section 7: provides a summary and conclusion.



2 Site Description and Context

- 2.1 The application site measures 17.5ha in size and is located within the settlement boundary immediately adjacent to the urban edge at Pagham, as illustrated at the Site Location Plan (Drawing No. 167-P-001).
- 2.2 Hook Lane forms the eastern and south eastern boundary with existing residential development at Drift Lane and the wider environs beyond.
- 2.3 The site is well contained on the northern and western boundary by Sefter Lane and Pagham Road respectively, both of which are defined by large native hedgerows containing hedgerow trees.
- 2.4 The site comprises arable land with periphery hedgerows and tree groups. There is a small change in topography from 6.7m Above Ordnance Datum (AOD) at the eastern boundary to 4-4.5m AOD at the western boundary. The full topographical survey is contained in Appendix A of the Flood Risk Assessment.
- 2.5 In the wider context the site is well related to the surrounding residential development to the east. To the west is a small cluster of farm buildings (Rookery Farm) beyond which is Barfoots and Botley Ltd – a large farm and food processing plant.
- 2.6 The site is located 1.6km north east from Pagham Harbour which is a European designated site (also commonly referred to as Natura 2000 site); such sites are protected under the Conservation of Habitats and Species Regulation 2010 (the 'Habitats Regulations'). This site is also listed as a Wetland of International Importance, is a RAMSAR site and is also of national importance as a Site of Special Scientific Interest (SSSI).
- 2.7 The site lies wholly within Flood Zone 1; being land assessed as having less than a 1 in 1,000 year annual exceedance probability (0.1% AEP) of river or sea flooding and thus the most appropriate location for development when appraised against the DCLG National Planning Practice Guidance 2014.
- 2.8 A Landscape Capacity Study commissioned by Arun District Council was prepared by Hankinson Duckett Associates in 2016. The study includes the Rose Green area which is formed of three separate areas, one of which (2a) is the application site. The report concludes that the planning application site has been judged to have *"a high capacity for development from a landscape perspective, and could accommodate allocations of new development without significant detrimental effects on the character of the landscape as a whole, provided the form of new development proposals are closely related to, and in scale with, existing adjacent settlement"*.
- 2.9 The Study assesses the application site in terms of landscape sensitivity and landscape value. It concludes firstly that the overall sensitivity judgement was 'slight' and secondly that the overall value judgement was also 'slight'. On this basis it finds that the site has a 'high' landscape capacity for development.
- 2.10 The application site is identified as Grade 2 agricultural land. Best and most versatile land is defined as Grades 1, 2 and 3a. Almost all of land around Pagham is of Grade 1 or Grade 2 agricultural land. Therefore, if the objectively assessed need for housing as defined by the Local Plan is to be met, building on the best and most versatile land will be necessary.



Planning History

- 2.11 A previous planning application submitted in 1999 for the construction of 175 dwellings was refused. At that time, the application site measured approximately 9 hectares and was a smaller site area than is the case now. The Appeal was dismissed for the following reasons:
- 2.12 Firstly, it was premature to the then upcoming Local Plan process. That is something that is no longer relevant because it is an allocated site in the recently adopted Local Plan.
- 2.13 Secondly, the scheme would result in damage to the Strategic Gap. Again, the site is not now part of the Gap policy and is intended to be developed.
- 2.14 Thirdly, the scheme would result in the loss of agricultural land of quality. The application site is Grade 2 but it is important to see this in the context of agricultural land quality more generally around Pagham which is mostly either Grade 1 and 2. As such, in order to increase the supply of housing, agricultural land is going to need to be developed.
- 2.15 Fourthly, the location of the proposed development was not well related to areas of employment and to transport links. More recent and up to date assessments of this site's location through the new Local Plan process have confirmed that the site is suitable in principle for future housing potential, because of its accessibility to facilities, job opportunities and public transport, and because there are no insurmountable constraints
- 2.16 For these reasons, it is evident that the present circumstances are materially different to when the Appeal was dismissed some sixteen years ago.
- 2.17 A more recent planning application was submitted in January 2017, reference P/6/17/OUT. This sought planning permission in the same form as this current application. At that time, it was submitted in response to the identified shortfall of housing land supply in the District and in response to the Resolution by the Council to consider applications on suitable sites identified in the SHLAA. Later, the site was included within the Local Plan's Proposed Main Modifications as part of the Pagham North Strategic Site; required to meet the identified Objectively Assessed Need. The Local Plan Examination reconvened during 2017 and considered amongst other things the overall scale of housing required in the plan area and the various allocations. The Local Plan Inspector's Report endorsed the Pagham North allocation and the Local Plan was duly adopted in July 2018.
- 2.18 The planning application was presented to the Council's Development Control Committee first on the 23rd October 2018. The Officer's recommendation was that planning permission be granted, subject to a Section 106 Agreement and Conditions. However, Members of the Development Control Committee resolved not to accept this recommendation and failed to bring forward a reason for refusal and that meeting was suspended.
- 2.19 On the 13th November 2018 the Committee meeting was reconvened, the application was deferred for the Council to commission an independent review of the submitted Road Safety Audit.
- 2.20 Having received this independent review, the application was then presented again on the 23rd January 2019 to the Development Control Committee, again with Officers recommending the planning permission be granted. On this occasion Members resolves to refuse the application.



2.21 The reason for refusal was as follows:

Increased vehicle movements generated by the application will exacerbate the capacity issues on the local highway network and the mitigation measures proposed are insufficient to overcome the safety concern resulting from the additional vehicle movements contrary to Policy T SP1.

2.22 The Applicant disagrees that planning permission should have been refused and have submitted an appeal pursuant to Section 78 of the Town and Country Planning Act 1990.

2.23 The highway mitigation measures are based on a cumulative assessment of traffic effects associated with 1200 dwellings proposed at Pagham in the Local Plan. This was assessed and adapted by Dougall Baillie Associates having been appointed by the Council to independently review the work undertaken. These mitigation measures are to be provided jointly and separately by the development proposals at Pagham. It is important to recognise that the Council approved planning permission for three other planning application at Pagham, totalling 745 dwellings which each are based on the same highway mitigation measures. The Council therefore acted unreasonably and against the advice of the Council's professional Planning Officers.



3 The Proposed Development

- 3.1 Planning permission is sought for the following proposed development:

The construction of up to 300 new homes, a care home of up to 80 beds, D1 uses of up to 4,000sq.m including a 2 form entry primary school, the formation of new means of access onto Hook Lane and 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.

- 3.2 Matters not reserved for subsequent approval relate to vehicular access from Hook Lane and Pagham Road.

- 3.3 The Development Framework Plan (Drawing No. 167-P-06) provides a pictorial; explanation of these development proposals and the scheme's parameters.

Built Development

- 3.4 The proposal will provide up to 300 new high quality houses in a range of sizes and tenures. Houses will range from 2 to 5 bedrooms and will include both shared ownership and rented accommodation. All housing will have dedicated car parking in line with the current standards and will be arranged to ensure they all have private garden space.
- 3.5 In addition, an 80 bed care home is proposed in the south west corner of the site. This will include car parking and communal gardens.
- 3.6 Planning permission is also sought for a 2 form entry primary school (D1 use class). The Local Education Authority have identified a need for a 1 form entry school to meet the primary school places arising from future development at Pagham, but have proposed that a site sufficient to accommodate two forms of entry is provided to enable enlargement of the new school at a later date.
- 3.7 Through granting planning permission for development at Pagham South (P/140/16), the Local Education Authority has received land for the construction of the Primary School. Financial contributions are also expected from Pagham South and Pagham North towards the construction of the school. At the present time an Application to Judicially Review the Pagham South planning permission and therefore the fall back position of providing the Primary School at Hook Lane has been retained for the time being.
- 3.8 Adjacent to Hook Lane, planning permission is sought for a building to house D1 uses. This would allow for, amongst other things, this part of the site to be developed for a clinic, health centres, crèches or day nurseries. Such uses were identified as desirable through the public consultation that has been undertaken, although similar provision has been made at Summer Lane also.

Means of Access

- 3.9 Vehicular access is proposed from Hook Lane and Pagham Road.
- 3.10 The design of the access including visibility has been agreed with the local highway authority, West Sussex County Council, and has been subject to an independent Stage 1 Road Safety Audit. The access drawings are as follows:



- JNY8840_09A Proposed Access Arrangement on Hook Lane (North)
- JNY8840_12A Proposed Access Arrangement Pagham Road Without Right Turn Lane

- 3.11 In terms of pedestrian access the scheme seeks a permeable development to make it easy for residents to walk or cycle to local facilities. The development proposal includes three pedestrian accesses onto Hook Lane which will be a minimum width of 3m linking with the existing footway network. These accesses will be in addition to the vehicular accesses which will have 2m wide footways on either side of the road. The detailed design of these pedestrian points of access will be the subject of a planning condition.
- 3.12 The proposal also includes potential traffic calming along Hook Lane in the form of table top ramps. This would enforce the speed limit which is currently being exceeded and will also make it safer for pedestrians to cross so as to encourage access to local facilities. The provision of table top ramps will also provide level crossing points making it easier for those with prams or those with impaired mobility to cross.
- 3.13 The proposal also includes for the provision of a formal bus layby on Pagham Road near to the Hook Lane junction and a contribution will be provided towards upgrading the existing local bus stops to provide raised kerbs and new bus flags/information secured as part of a S106 agreement.
- 3.14 Parking provision is a matter reserved for subsequent approval but will accord with the minimum residential parking standards based on WSCC's parking calculator.

Green Infrastructure

- 3.15 The proposed development includes 6.5 ha of Green Infrastructure (GI) which will provide a robust framework of structural planting, open spaces (both hard and soft) and habitat creation. This Green Infrastructure will enhance biodiversity and promotes recreation, movement and leisure, and access to nature.
- 3.16 The proposed development includes the creation of new parkland centred around the existing watercourse crossing the site which is to be realigned and enhanced with new planting for biodiversity and public amenity. The proposal includes a viewing mound which seeks to open up views north to the South Downs Area of Outstanding Natural Beauty.
- 3.17 A new equipped children's play area is proposed including both fixed equipment such as slides and swings alongside logs, boulders and earth mounding etc. for natural play. To the north of the site open space is proposed for informal ball games, picnics and dog walking. New footpaths and cycle routes are proposed through the development.
- 3.18 To the south of the site a small green is proposed to provide an attractive outlook for the proposed care home and be used as informal recreation space. The green also ensures that the development is set back from the junction of Hook Lane and Pagham Road.
- 3.19 Along the northern and western boundaries of the site a green buffer is proposed. This will maintain the existing boundary hedge planting and be reinforced with new woodland planting.
- 3.20 The site's GI seeks to accord with recommendations of the Arun Green Infrastructure Study by Landuse Consultants (June 2012) which states that "...opportunities to create or retrofit a softer edge to the urban edge, with green wedges or features (such as semi-natural hedges) extending into developed land..." should be taken (p. 50).



Drainage

- 3.21 The Environment Agency's Flood Maps confirm that the site lies within Flood Zone 1 – land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding. Additionally, the maps confirm that the site lies outside of the 1 in 100 year extreme coastal flooding extent and therefore in an area at low risk of flooding.
- 3.22 An existing watercourse passes through the site, flowing generally east to west. In its current form, the water feature is heavily engineered and therefore, as part of the development, it is proposed to naturalise this watercourse, providing bends and meanders whilst slackening the side slopes and creating a more sensitive area with landscape and biodiversity benefits.
- 3.23 A Sustainable Drainage Scheme (SuDS) is proposed comprising of permeable paving (where appropriate), swales and attenuation basins (shallow ditches and ponds), to deal with surface water run-off from the proposed development site in line with current best practice recommendations. Through utilising these landscaped features, it will be possible to reduce the run-off rate below the current baseline during extreme storms. In addition, these features will reduce flood risk, help to improve water quality and provide biodiversity and ecology benefits.
- 3.24 Foul drainage will discharge to the existing Southern Water network in the vicinity of the site, the nearest waste water treatment works being that at Pagham or Lidsey.

Habitat Regulation Assessment

- 3.25 A Habitat Regulation Assessment (HRA) was prepared on behalf of the Council in September 2018 for Application P/6/17. This considered three potential impacts that continue to be pertinent to this application.
- 3.26 Birds: This Assessment concluded that Dark-Bellied Brent Geese are unlikely to use the land within or adjacent to the application site to the extent that could be considered to be 'regularly used functionally linked habitat for Brent Geese'. This concludes that this proposal would not lead to a likely significant effect through loss of habitat.
- 3.27 Recreational Pressure: As is conventional a financial contribution towards the strategic mitigation measures at the Harbour would be provided, along with accessible greenspace as part of the development.
- 3.28 Waste Water: The HRA considered potential water pollution impacts of development as well. This concluded there would not be any likely significant effects from development subject to sufficient capacity at the Waste Water Treatment Works being provided.
- 3.29 As a result of the above proposed mitigation measures it is considered the Assessment was able to conclude that will be no adverse effect on the integrity of Pagham Harbour SPA/Ramsar. On this basis the proposed development accords with paragraph 177 of the NPPF.



4 Arun District Local Plan

- 4.1 The Arun Local Plan 2011-2031 was adopted on the 18th July 2018. It provides a framework of planning policies and is used as a basis for decision making in planning applications.
- 4.2 The Plan sets out the vision for Arun for the plan period, through a spatial vision, objectives and a sustainable strategy for delivering the needed growth in the District. The strategic housing requirement for the plan period is set out in **Policy H SP1** which identified that at least 20,000 new homes will be accommodated in the District in the plan period.
- 4.3 The Application Site is allocated in **Policy SD2** as part of the Pagham North strategic allocation. The policy defines key design and infrastructure requirements, which include: no detrimental impact to Pagham Harbour SPA; design takes into account nearby Heritage assets; provide a new one-form entry primary school and nursey places; provide a care home facility; provide a community hub; provide public open space; contribute to the provision of an enhanced local cycle network; and where possible, provide linkages and accessible pedestrian and cycle route to Bognor Regis town centre.
- 4.4 The site allocated for policy SD2 is divided into two parts. The southwestern parcel is the site of the application, with the north eastern parcel having secured resolution to grant planning permission in November 2018.
- 4.5 Policy **AH SP2** would require the proposed development to provide a minimum 30% affordable housing.
- 4.6 The site is located within the 5km buffer zone to the Pagham Harbour and therefore **Policy ENV DM2** is relevant. This states that for all new residential development and development which is likely to have an impact on Pagham Harbour within this buffer zone will be required to make developer contributions towards the agreed strategic approach to access management at Pagham Harbour; and create easily accessible new green spaces for recreation within or adjacent to the development site.
- 4.7 **Policy T SP1** states that the Council will support transport and development which reduces the need to travel by car. This policy also aims to ensure that growth in the District provides safe access on to the highway network, through creating safe and secure layouts for traffic, cyclists and pedestrians whilst avoiding street clutter.
- 4.8 The Council will support development which is designed to adapt to impacts arising from climate change through Policy ECC SP1.
- 4.9 **Policy OSR DM1** states that new developments will have to contribute towards open space, sport and recreation. The Local Plan requires, through **Policy ENV DM5**, that development schemes shall seek to achieve a net gain in biodiversity and protect existing habitats on site.
- 4.10 **Policy W DM2** refers to flood risk and how development in areas at risk from flooding will only be permitted where it meets the criteria set out within the policy. Sustainable Urban Drainage Systems (SUDs) are required through **Policy W DM3**.
- 4.11 **Policy INF SP1** demonstrates how the Council will support development proposals which provide or contribute towards the infrastructure and services needed to support the development.



4.12 **GI SP1** relates to the Green Infrastructure Network and ensures that all major development must be designed to protect and enhance existing Green Infrastructure assets. **LAN DM2** aims to protect the landscape character in relation to new development in the District and maintaining the historic character. **D SP1** states that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in the proposals. In relation to this, **D DM1** sets out 15 criteria that the Council use within decision making for applications, which relate to aspects of form and design quality. Lighting schemes are required by the Council for any proposals which involve outdoor lighting, as stated in **QE DM2**. Similarly, **QE DM3** states that all major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts. **H DM1** indicates that the Council will seek a mix of dwelling types and sizes, with the tenure mix for development schemes to be negotiated on a case by case basis. **H DM2** sets out the requirements for development in relation to independent living and care homes.

4.13 In the table below the relevant policies are responded to be the development team to demonstrate how the scheme complies with the Local Plan policies.

Policy	Response
AH SP2 Affordable Housing	The affordable housing will be secured through a legal agreement.
D DM1 Aspects of form and design quality	The arrangement of land uses is shown on the Development Framework Plan. This reflects the site's characteristics and the principles of good design. Layout, appearance and landscaping are all reserved matters that will be determined at a later date having regard to the design principles in the Design and Access Statement and relevant planning policies.
ECC DM1 Renewable Energy	Renewable energy provision can be secured through a planning condition, if required on this site.
ECC SP1 Adapting to Climate Change	The accompanying Flood Risk Assessment demonstrates the suitability of the site for development, with only a small section in the north west corner falling within flood zone 2 with the rest being located within flood zone 1. The proposed development has taken into account the criteria of this policy and demonstrates its compliance with the details presented in the outline application. Further details will be included within the reserved matters application which will illustrate the developments consideration of this policy.



ECC SP2 Energy and climate change mitigation	Final detailing of the design of the houses will be within the reserved matters application and can be secured through a planning condition.
ENV DM2 Pagham Harbour	The Habitats Regulations Assessment conducted on behalf of the Council by EPR (September 2018) demonstrates that, with the three elements of mitigation identified, the proposed development will not have an adverse impact on the Pagham Harbour.
ENV DM4 Protection of trees	As part of the application an Arboricultural Assessment has been submitted with the application. This concluded that the tree stock is contained to the boundaries of the site. The proposed access will be removing several short sections of low quality tree and hedgerow boundary material. This area is considered to be a limited Arboricultural value and its loss should not raise any objection on Arboricultural grounds. There would be the removal of the tree, identified as T1 in the assessment, which is due to the re-alignment of a drainage ditch. The new development will be providing an extensive amount of tree planting around the development and in areas of public open space as part of the supporting Green Infrastructure. The assessment concludes that this planting will more than offset the loss of the small amount of low quality boundary material that requires removal to facilitate the various access points into the site.
ENV DM5 Development of biodiversity	An Ecological Appraisal has been carried out as part of the application which considers mitigation measures, illustrating that the development will not give rise to any unacceptably adverse effects to the biodiversity and natural environment at this site.
ENV SP1 Natural Environment	
H DM1 Housing Mix	Housing mix will be determined at the detailed application stage.
H DM2 Independent Living and Care Homes	The proposed inclusion of a care home meets this policy and will aid in meeting the housing requirements for care homes in the District.
HER DM1 Listed Buildings	There are a number of listed buildings situated within the proximity of the application site. However, it is considered that the proposed development will preserve the setting of listed
HER DM2 Locally Listed Buildings or Structures	



of Character	buildings surrounding the site and as such would accord with these policies.
HER DM6 Sites of Archaeology Interest	The accompanying heritage assessment concludes that the site has low potential for remains of all archaeological periods.
HER SP1 The Historic Environment	A Heritage Desk Based Assessment was completed for this application and it concluded that the proposed development is considered to have negligible impact on the setting and significance of designated heritage assets in the vicinity of the study site. The proposed development will preserve the setting of listed buildings and as such will comply with this policy.
H SP1 Housing Allocation the Housing Requirement	This policy has established the need for development on this site to help meet housing need.
H SP2 Strategic Site Allocation	The development proposal has been comprehensively planned and high quality design has been used to produce the masterplan. Infrastructure proposals have been considered in conjunction with other development proposals at Pagham.
HWB SP1 Health and Wellbeing	The accompanying Design and Access Statement illustrates the provision of public open space which will encourage residents of the development and local area to engage in physical exercise. The mixed use of this development and in relation to surrounding areas will promote sustainable and healthy methods of transport such as walking and cycling. Therefore, the proposed development will be compliant with this policy.
INF SP1 Infrastructure provision and implementation	The proposed development will accord with this policy through the provision of land for a new 2FE primary school if required and s106 contributions towards community facilities and transport and highways improvements.
INF SP2 New Secondary School	Financial contributions towards secondary school can be secured through a Section 106 Agreement.
LAN DM1 Protection of Landscape Character	The proposed development has taken into



	consideration the natural characteristics of the local area and as illustrated within the Design and Access Statement will aim to include these characteristics in the final design. Within the reserved matters application final designs will be presented and will be compliant with this policy.
SD SP1a Strategic Approach	The proposed development scheme is compliant with this policy as shown through this Planning Statement and the provision of housing through sustainable growth within the District.
SD SP2 Built-up Area Boundary	Development has been located within a suitable location which accords with this policy.
SKILLS SP1 Employment and Skills 1	Through the construction of this development there will be the provision of jobs and will raise skill levels and increase employability levels within the District.
SO DM1 Soils	The land is allocated within the Local Plan and is therefore designated by the plan. This means the proposed development is compliant with this policy in relation to housing development. And it would not be subject to an assessment under policy SO DM1.
T DM1 Sustainable Travel and Public Rights of Way	The Design and Access Statement and Transport Assessment which accompany this application demonstrate how the proposed development will promote sustainable methods of transport. The Transport Assessment illustrates the access to day-to-day facilities and services in the vicinity of the site, including bus stops and a range of facilities in walking distance of the site.
T SP1 Transport and Development	There will be highway infrastructure improvements, which will be secured through a s106 agreement. These will mitigate against the highways impacts of the proposed development and will comply with this policy. At the reserved matters stage the details of parking will be agreed. The development will accord with the minimum residential parking standards and the requirements for cycle storage.
W DM1 Water Supply and Quality	Water supply can be secured through a planning condition.



W DM2 Flood Risk	A Flood Risk Assessment accompanies this application. This concludes that the proposed attenuation basins will not result in an unacceptable impact upon the open space provision at the site. The majority of the site, except a small area of land in the north-western corner which is flood zone 2, is identified as flood zone 1.
W DM3 Sustainable Urban Drainage Systems	A Sustainable Drainage Scheme (SUDs) is proposed comprising of permeable paving (where appropriate), swales and attenuation basins, to deal with surface water run-off from the proposed development site in line with current best practice recommendations. Through utilising these landscapes features, it will be possible to reduce flood risk, help to improve water quality and provide biodiversity and ecology benefits.
WM DM1 Waste Management	Waste management can be controlled by means of a planning condition.
W SP1 Water	Through the design of SUDs the proposed development will be ensuring it meets the criteria of this policy and will enhance the water environment.
QE DM1 Noise Pollution	The accompanying Noise Assessment demonstrates that the proposed development will not be significantly affected by noise levels in the immediate vicinity. Noise impacts arising from the development are considered to be negligible.
QE DM2 Light Pollution	The Design and Access Statement demonstrates the principles for the design of street lighting which form the basis for an external lighting scheme. Lighting can be controlled by means of a planning condition.
QE SP1 Quality of the Environment	The development will positively enhance the quality of the environment, with no adverse impacts on the local environment. The Design and Access Statement illustrates the provision of green infrastructure and design which considers the natural environment of the site.
OSRDM1 Protection of Open Space, Outdoor Sport, Comm& Rec Facilities	The proposed development will provide new areas of open space and will provide financial contributions towards off-site improvements.



5 Material Considerations

5.1 The relevant material considerations in the instance of this application are as follows:

- The National Planning Policy Framework and its presumption in favour of sustainable development; and
- The Pagham Neighbourhood Plan.

5.2 Each of these is explored in the following paragraphs:

Presumption in Favour of Sustainable Development

5.3 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It provides guidance for Local Planning Authorities (LPAs) and decision-takers both in the preparation of plans and as a material consideration in determining planning applications.

5.4 The presumption in favour of sustainable development, set out in Paragraph 11, is at the heart of the framework. For decision making the presumption means approving development proposals that accord with an up-to-date development plan should do so without delay.

5.5 The application site is allocated within the Local Plan for new housing development and the proposed development accords with this Development Plan and the presumption in favour of sustainable development is engaged.

5.6 In the following paragraphs the relevant policy areas of the NPPF are explored.

Promoting Sustainable Transport

5.7 The planning system has long sought to encourage a balance of uses such that key facilities are, where possible, located in close proximity to new residential development and this is maintained in the NPPF. This is aimed at minimising the need to travel. The availability of sustainable modes of travel – walking, cycling and public transport – are afforded a priority in determining suitable locations for development.

5.8 Pagham is a major built up area within Arun and contains such existing facilities. The application site benefits from a good level of accessibility for pedestrians. The existing road network to the north, east and south of the site has footways with street lighting and provide connections to local facilities surrounding the site. Within Appendix E of the accompanying Transport Assessment a plan is provided that shows the location of day-to-day facilities and services in the vicinity of the site. This illustrates that local facilities including bus stops, schools, retail and health services are either within walking or easy cycle distance of the site.

5.9 As described in Section 3 of the Transport Assessment, the site also benefits from good accessibility to bus service 600 that operates 7 days a week at a high frequency and connects to Bognor Regis town centre, and Chichester. The frequency of bus service 600 would provide a reasonable alternative to the private car for future residents of the proposed development for local trips in Bognor Regis and Chichester.

5.10 The site is within a reasonable cycle distance of Bognor Regis rail station that provides access to London Victoria and Littlehampton. In addition, Bognor Regis rail station is also accessible via a



short walk from bus service 600 that accesses the town centre bus stops.

- 5.11 In regards to the local highway network, the NPPF encourages improvements to the highway network that effectively limit the significant impacts of development. It states that development should only be prevented or refused on transport grounds where the residual cumulative impacts are severe. The impact assessment undertaken as part of the Transport Assessment considers the proposed development vehicular movements and the background growth applied to determine the 2021 future year scenario. The results of the analysis demonstrate that the proposed development will not have a material impact on the local highway network and will not materially affect the operation of the existing junctions. The junction improvements proposed, both those which access the site and those within the local highway network, have been the subject of a satisfactory Stage 1 Road Safety Audit.

Delivering a Wide Choice of High Quality Homes

- 5.12 Amongst the NPPF's policy objective is the intention that the supply of housing is boosted significantly. In this regard, Councils are meant to maintain a 5-year supply of specific deliverable sites. Arun does not achieve this; a circumstance described in subsequent paragraphs. Granting planning permission for new development is central to meeting this policy objective.
- 5.13 The proposed development is part of the Council's housing supply strategy in the Local Plan. Through the preparation of the Local Plan the Council produced a Housing Implementation Strategy at the Examination (PELVP31). In relation to the application site a housing trajectory within this Strategy anticipates that the site would deliver completions in the current monitoring year 2018/2019.
- 5.14 The Housing Implementation Strategy illustrates that the Council would be able to demonstrate 5.1years supply of housing with the inclusion of this application site.
- 5.15 Consistent with another of the NPPF's policy objectives, the proposed development is intended to provide a wide choice of high quality market and affordable homes. This will include a mix of sizes, type and tenure. As this is an outline planning application, this objective will be secured at the reserved matters stage, but the Design and Access Statement provides a framework for future detailed design.
- 5.16 The Government now propose that Local Plan's calculate Local Housing Need on the basis of its Standard Method. Applying this method indicates that the District's Housing Requirement would be 1231 dwellings per annum compared to the current provision in the adopted Local Plan of 1000 dwellings per annum.

Requiring Good Design

- 5.17 Good design underpins the proposals as explained in the Design and Access Statement. This demonstrates the emphasis placed on achieving high quality and inclusive design, in particular by establishing a visually attractive development with a strong sense of place through streetscape and green infrastructure.
- 5.18 Whilst the detail of layout, appearance and landscaping will be determined through reserved matters applications, the framework provided by the Design and Access Statement and the Development Framework Plan ensures that good design principles will endure.

Conserving and Enhancing the Natural Environment

- 5.19 Significant importance has been placed on how the proposed development can conserve and



enhance the natural and local environment. Informed by a landscape and visual assessment, ecological surveys, an arboricultural assessment and consideration of drainage, the Development Framework Plan positively integrates new development with the site's important assets.

- 5.20 Regard has been had to maximizing long distances views towards the South Downs, and incorporating biodiversity and strengthening habitats, and improving water features such that they have a positive effect and multi-purpose functions.
- 5.21 As set out in Section 2, a Landscape Capacity Study of sites in Arun has been prepared which assessed the application site (2a within the report) in terms of landscape sensitivity and landscape value. As both the sensitivity and value of the site were assessed to be 'slight', it was concluded that the site has a 'high' landscape capacity for development. The report states that the site has been judged to have *"a high capacity for development from a landscape perspective, and could accommodate allocations of new development without significant detrimental effects on the character of the landscape as a whole, provided the form of new development proposals are closely related to, and in scale with, existing adjacent settlement"*.

Creating Health Communities

- 5.22 Paragraph 91 of the NPPF states that planning policies and decision making should aim to achieve healthy, inclusive and safe places which promote social interaction; are safe and accessible and enable and support healthy lifestyles.
- 5.23 The proposals will create a safe and accessible development, with clear and legible pedestrian routes and high quality public space and equipped play areas, encouraging the active and continual use of public areas. These high quality public open spaces and opportunities for recreation make an important contribution to the health and well-being of communities. The care home also contributes positively to the creation of an integrated community.
- 5.24 The proposed development will include D1 uses classes including a new 2 form entry Primary School to meet existing capacity issues and the needs of occupiers of the new development, widening education choice as advised at Paragraph 94 of the NPPF and access to community infrastructure more generally.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 5.25 The NPPF requires at paragraph 148 that full account is taken of flood risk and coastal change in planning decisions. New development should be planned to avoid increased vulnerability to the range of impacts of climate change. There are two primary considerations:
- development should be directed away from areas at highest risk of flooding; and
 - flood risk should not be increased elsewhere.
- 5.26 The Flood Risk Assessment that accompanies the planning application demonstrates that the site lies wholly within Flood Zone 1 and is the most appropriate location for the proposed development. The drainage strategy proposed will achieve a reduction to the run-off to a rate below the current baseline during extreme storms. The proposed development therefore accords with the principles set out in the NPPF.
- 5.27 As regards agricultural land, the NPPF acknowledges that there are instances where development of agricultural land will be necessary and on such occasions the use of areas of poorer quality in preference to a higher quality is sought.



Conserving and Enhancing the Historic Environment

- 5.28 Paragraph 184 of the NPPF states that heritage assets should be conserved in a manner appropriate to their significance so that they can contribute to the quality of life of this and future generations. A Heritage Desk Based Assessment has been prepared and accompanies the application which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of the site.
- 5.29 The assessment has established that, based on the available evidence, the site has low potential for remains of all archaeological periods. However, this apparent absence may be a product of a lack of systematic archaeological survey in the area. Consequently, the presence of archaeological remains cannot be ruled out, but should remains be present within the site, they are considered unlikely to be of more than local significance. Archaeology is not a development/design constraint.
- 5.30 It is anticipated that an archaeological evaluation will be required at a future date. The need, scope and timings of such works will need to be discussed and agreed with Arun District Council. Should the evaluation have positive results, further mitigation archaeological investigation may be necessary.
- 5.31 The proposed development is considered to have negligible impact on the setting and significance of designated heritage assets in the vicinity of the study site.

Synthesis

- 5.32 It is evident that the proposed development will contribute to many planning policy objectives in the NPPF. Importantly its benefits are substantial and compliant with the NPPF's policies. Whilst the proposed development will lead to the loss of agricultural land, this is a characteristic of the local area generally and a balanced view is required of this alongside the scheme's benefits.
- 5.33 There are no adverse impacts that demonstrably and significantly conflict with policies in the Framework. On the basis that the proposed development delivers sustainable development, and planning permission should be granted in accordance with Paragraph 14 of the NPPF.

Pagham Neighbourhood Plan

- 5.34 The Pagham Neighbourhood Plan consultation page states that the consultation on the Neighbourhood Plan has been paused for further studies to be undertaken. The latest stage the consultation got to was the publishing of the Submission Plan for the consultation which has since been paused.
- 5.35 The Neighbourhood Plan was published as a Submission Plan in October 2015. It does not identify the application site for development.
- 5.36 The Neighbourhood Plan was prepared in the context of the initial Submission version of the Local Plan which identified a requirement of 100 dwellings at Pagham but critically this was before the new Local Plan was adopted.
- 5.37 The Neighbourhood Plan is out of general conformity with the Local Plan.
- 5.38 Irrespective of this fact, the Neighbourhood Plan includes a number of other policies that have informed the development proposals. There are elements of the Vision for Pagham which the proposed development positively contributes towards:



- Development will not harm the special character of the village.
- Special regard has been given to edge treatments around the northern and western boundaries of the site to ensure the rural context of the settlement is not changed and indeed new GI proposals will in our view better integrate the urban edge of Pagham with the wider countryside by merit of green fingers extending into the development.
- Habitats and landscape features will be protected and enhanced and new open spaces will be created.
- Development will not harm the Harbour or any other important environmental features within the area.
- The Design and Access Statement provides a framework for ensuring that the design of new housing will respect existing character.
- **A range of new housing will be provided including accommodation for elderly persons.**
- * Development will be accessible to local facilities at Pagham to support its vitality and viability.

5.39 Policy 2 identifies the two sites that are allocated for development. This policy is framed by the Parish's 100 dwelling requirement and as such no weight should be given to the fact the application site is not listed in Policy 2.

5.40 Policy 3 Housing Design is addressed in the Design and Access Statement. The requirement for a Flood Risk Assessment is met with the submission of the accompanying document. Policy 4 and the Local Green Space designations it identifies does not relate to the application site. Policies 5, 6, 7 and 8 do not relate to the proposed development. Policy 9 concerns agricultural land but does not relate to the proposed development. The Infrastructure Projects and Sustainable Transport measures identified in the plan include traffic calming on Pagham Road, managing speeds along Pagham Road, improving the junction of Pagham Road and Sefton Road, improving public transport services and promoting cycling. The measures identified in the Transportation Assessment accord with these objectives

5.41 It is evident, therefore, that whilst the proposed development does not accord with the Submission Version of the Neighbourhood Plan, a fact that is of limited weight given the need for increased development within Arun and that the District Council have allocated land at Pagham to meet this, other relevant policies in the Neighbourhood Plan have been met. This fact is material in determining the planning application and weighs in favour of planning permission being granted.

Summary

5.42 The above demonstrates that a number of material considerations provide a framework to support the grant of planning permission.

5.43 The proposed development attracts the presumption in favour of sustainable development from the NPPF; through the allocation of the site within the adopted Local Plan the application will be aiding in meeting the housing needs of the District. Therefore, the presumption in favour of sustainable development is engaged.

5.44 The site has been allocated within the new Local Plan, reflecting the Council's views on it being a suitable site for residential development. Whilst the emerging Neighbourhood Plan does not identify this site for development, and thus conflicting with this, the Neighbourhood Plan does not consider the scale of growth that Arun are now having to address through additional strategic



allocations. Importantly, the development proposals are suitably located and designed when considered in the context of the criteria proposed by the Neighbourhood Plan for assessing future development.

- 5.45 In overall terms, the allocation of the site and the material considerations demonstrate the suitability of the site for residential development, with no weight being given to the Pagham Neighbourhood Plan. Accordingly, planning permission should be granted.



6 Delivery

Landownership

- 6.1 The application site is controlled by Hallam Land Management Ltd by means of Option Agreement. There are no legal impediments to the development proceeding once planning permission has been granted.

Commencement of Development

- 6.2 Following the grant of outline planning permission, the site will be disposed of to a housebuilder who will develop the site. Reserved Matters approvals will be required for layout, appearance and landscaping. Pre-commencement conditions will also have to be discharged.
- 6.3 It is reasonable to anticipate development will commence in early 2020.
- 6.4 The following broad build programme can be anticipated:
- Year 1 50 dwellings
 - Year 2 70 dwellings
 - Year 3 100 dwellings
 - Year 4 80 dwellings
- 6.5 The proposed development will be complete within the next five years and will have contributed positively to the Council's housing requirement in this period.

The Sequence of Development

- 6.6 Development will be undertaken in following broad sequence.
- Ecological mitigation works as described in the Ecological Appraisal;
 - Formation of access for construction work, either at Pagham Road or Sefter Road (temporary);
 - Groundworks and drainage; services to the care home and D1 use parcels;
 - Formation of access onto Hook Lane;
 - Residential development (commencing in the south of the site and progressing north west with creation of additional points of access as required);
 - Green Infrastructure enhancements in conjunction with new houses;
 - Laying out of areas of open space;
 - Removal of temporary access (if provided); and
 - Completion of the Pagham Road Access.

Infrastructure

- 6.7 Based on discussions undertaken in respect of Application P/6/17 and having regard to the decisions taken by the Council in respect of other Applications at Pagham, the infrastructure requirements have been considered as part of the proposed development and are summarized in the table below:



Infrastructure	Delivery
Formation of new vehicular access Pagham Road Hook Lane	Delivered as part of the development pursuant approved access drawings
Public Transport New layby on Pagham Road Improvements to existing Bus Stops	Highway Agreement and / or Financial Contribution for provision by the West Sussex County Council.
Realignment of current watercourse and creation of sustainable urban drainage systems, swales, attenuation ponds	Delivered as part of the development.
Traffic calming on Hook Lane	Financial Contribution for provision by the West Sussex County Council if required.
Education	If required to be provided on this site, the school site will be made available to West Sussex County Council. Financial contributions from this and other developments at Pagham will be provided to enable the construction of a 1 form entry school. Financial Contributions towards Early Years and Secondary School provision.
Green Infrastructure	To be provided as part of the development.
Foul Water Infrastructure	Upgrade to existing sewer capacity within Leonora Drive.
Special Protection Area	Financial Contribution for off-site mitigation.
Health Care	D1 use class could enable such provision to locate within the proposed development.
Recreation – Open Space and Play Space	Delivered as part of the development.
Recreation – Sports Provision	Financial Contribution for off-site mitigation if required.
Off-site highway improvements	Junction Improvements and financial contributions for off-site mitigation as set out the Cumulative Assessment.



7 Conclusion

- 7.1 Hallam Land Management Ltd are seeking outline planning permission for the construction of up to 300 new homes and community infrastructure (D1 uses) on land to the north west of Hook Lane, Pagham.
- 7.2 The site is allocated within the recently adopted Local Plan Policy SD2, for residential development. This demonstrates its suitability for development and complies with the NPPF.
- 7.3 The material benefits of the proposed development are considerable. It will provide both private and affordable housing of a suitable scale commensurate with the status of Pagham, increasing the supply of new housing generally in the District and at a location deemed suitable for future development and well related facilities, job opportunities and public transport.
- 7.4 The consultation on the Pagham Neighbourhood Plan has been paused and it is considered that no weight should be given to this document due to the uncomplete consultation process and incompleteness of the Plan.
- 7.5 Critically, the presumption in favour of sustainable development is engaged on the basis that the proposed development accords with the Development Plan and planning permission should be granted without delay.
- 7.6 Accordingly, for these reasons, the proposed development is commended to the LPA and planning permission should be granted.



Appendix 1 – Development Framework Plan



Application Boundary (17.2ha)

Housing - up to 7.2ha

Primary School or Housing - 2.4ha
Land safeguarded for the provision of a Two Form Entry Primary School to include access, car parking and external play space - should this area not be required it could be used for Housing.

Proposed D1 Use - 0.4ha
Potential for a Children's Day Nursery and / or Health Centre as required - should this area not be required it could be used for Housing.

Care Home or Specialist Housing for the Elderly - 0.55ha

Vehicular Access

Primary Vehicular Route
Masterplan Option 1&2.

Pedestrian Access
Proposed footpath connections onto Hook Lane

Potential Vehicular Route
This is not required if the Two Form Entry Primary School is to be constructed.

Areas of Interest
Viewing Mound - provides views towards the South Downs

Areas of Interest
Formal Equipped Children's Play Space

Green Infrastructure - 6.65ha
Framework of structural planting, open spaces (both hard and soft) and habitats - includes road infrastructure with single frontage development (excluding Semi-Private Drives)

Waterways & Ponds
Sustainable Drainage Systems Planted for Amenity Benefit

All areas shown on this development framework are approximate



All dimensions to be verified on site. Do not scale this drawing. All discrepancies to be clarified with project Landscape Architect. This drawing is the property of Urban Wilderness Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of Urban Wilderness Ltd. Ordnance Survey material is used with the permission of The Controller of HMSO, Crown copyright LAN1001412.

E	31 Mar 17	Southern Hook Lane Access Omitted	NJE
D	09 Jan 17	amendments to key	AJK
C	05 Jan 17	redline boundary amendment with associated development parcel change.	AJK
B	22 Dec 16	Potential Pedestrian Link removed	AJK
A	20 Dec 16	gl added to the key	NJE
rev	date	details	



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client
Hallam Land Management Ltd

project
Hook Lane, Pagham

drawing title
Development Framework

drawing status
PLANNING

drawn by	checked by	date
AJK	NJE	19 Dec 16

scale	paper size
1:1250	A1

job/dwg no.	rev.
167/P/006	E



Appendix 2 – Site Location Plan

All dimensions to be verified on site. Do not scale this drawing. All discrepancies to be clarified with project Landscape Architect.

REDLINE BOUNDARY - 17.2HA



urban wilderness
landscape architecture

client
HALLAM LAND MANAGEMENT LTD

drawing status
PLANNING

drawn by AJK	checked by NJE	date 23 DEC 2016
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scale 1:1250 paper size A1

job/dwg no. rev.
167/P/009 A



Appendix 3 - Planning Application Documents

Town and Country Planning Act 1990

List of submission documents

HOOK LANE, PAGHAM

Hallam Land Management Limited

- Covering Letter
- Application Forms
- Drawings
 - 167-P-006 REVE Development Framework Plan
 - 167-P-009-A Redline Boundary Plan
 - 167-P-003 Illustrative Masterplan
- Access Plans
 - JNY8840_01E Proposed Access Arrangement off Pagham Road
 - JNY8840_12A Proposed Access Arrangement Pagham Road without Right Turn Lane
 - JNY8840_09A Proposed Access Arrangement on Hook Lane (North)
 - JNY8840_11A Potential Traffic Calming Measures Along Hook Lane
- Affordable Housing Statement
- Agricultural Land Classification and Soil Resources 7226 110516
- Arboricultural Assessment
- Design and Access Statement
- Draft Heads of Terms
- Biodiversity Checklist for ADC 100315
- Ecological Appraisal
- Ecological Technical Note
- Flood Risk Assessment
- Heritage Desk Based Assessment
- Landscape and Visual Impact Assessment
- Noise Assessment
- Planning Statement
- Statement of Community Involvement
- Transport Assessment
- JNY8840-03 Travel Plan_060117_FULL

March 2019