



Mrs Louise Chater
Clerk

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Mr David Easton,
Arun District Council
Submitted by Email

Dear David,

Arun District Planning Application P/30/19/OUT - Land North of Hook Lane, Pagham

North Mundham Parish Council has already commented on an earlier version of an application for this site, in a collective response to applications P/134/16/OUT, P/140/16/OUT and P/6/17/OUT. A copy of this earlier response is annexed to this note. We remain concerned that the potential impact on adjacent communities of these three proposed developments has not been properly assessed and appreciated, and on that basis we wish to record our objection.

Our main concerns lie with the potential for increased traffic through the parish mainly, but not exclusively, on the B2166 and Vinnetrow Road - the volume of traffic on Marsh Lane is already an additional issue for local residents. However we also have concerns about drainage, the provision of cycle routes and the effect on the environment.

We have considerable difficulty in presenting a detailed response because we have neither the expertise in-house nor the financial resources to engage specialists to conduct a detailed analysis of the data presented to us. Our principal concern is that all the data with which we have been presented focuses on traffic flows along the main routes, with no consideration of the effect on side roads at junctions and on the safety of pedestrians. The parish of North Mundham has a primary school adjacent to the B2166 and a nursery school close by. Although there is a single light-controlled pedestrian crossing close to the school, this is of no help to pedestrians attempting to cross the B2166 at other junctions.

We are therefore concerned that this application fails to address the effects of this proposed development and others on:

- Local traffic in our parish
- Pedestrian safety
- Traffic pollution - both atmospheric and noise

For example, the Transport Assessment considers the B2166 / Vinnetrow Road / Mill Lane Junction (the 'Walnut Tree' Junction), but does not consider the impact on any of the other junctions in North Mundham, such as the B2166 junction with Marsh Lane and Brookside, and the B2166 junction with Church Road and School Lane.

We are also concerned that the transport assessments only consider the effects on vehicular traffic, and take no account of the safety of pedestrians trying to cross the road at or near these

junctions. For example, the implications for pedestrian safety at the Walnut Tree junction have long been a cause of local concern. In response to these concerns WSCC Highways commissioned a report looking at ways in which pedestrian safety at the junction might be improved, but from which no pedestrian safety measures have yet resulted.

This proposed improvement to mitigate the effect of increased traffic at the Walnut Tree junction is a very short length of additional lane in the approach from the western arm of the B2166. We are not convinced this would do anything to ameliorate the traffic situation and it will do nothing for pedestrian safety. The previous work on pedestrian safety at this junction has indicated that the two lanes on the B2166 where it joins the junction from the east present a particular difficulty for pedestrians trying to cross that arm of the roundabout. We therefore have serious reservations about any proposal to add an additional approach lane on the western arm.

Despite the predictions of increased traffic flow, none of the assessments recognise the potential for increased pollution of the atmosphere and noise pollution, or offer any measures in mitigation. This must be a serious concern particularly because the playground of North Mundham School is immediately adjacent to the B2166 and at a slightly lower level,. It is already affected by both traffic fumes and noise, and this will only get worse. Other residents of the parish may escape the worst of the exhaust fumes but will find it impossible to avoid the increased noise. We would expect to see both aspects of pollution addressed in any assessment of the impact of increased traffic.

We are far from convinced that the traffic assessment has taken proper cognisance of the other potential changes to the boundary conditions of the study area. It appears to treat the proposed development, together with the two other developments already approved, as the only changes to be considered. For example there is no consideration of additional traffic on the B2145 which might result from future developments in Selsey, additional traffic from rat-running on Marsh Lane which might result from the many anticipated residential developments in the Arun District, and traffic on Vinnetrow Road from future developments on the Fuel Depot site adjacent to the Bognor roundabout on the A27.

More significantly, we see no sign whatsoever of any consideration of the potential impact of the various options being considered for upgrades to the A27, and the impact they may have on local traffic. Although these changes feature in the transport mitigation measures assumed in Chichester District's Draft Local Plan, they have already been called into question and they would in many cases be entirely subsumed by changes proposed in the various options recently proposed for the A27.

It is clear that there is still much to do to produce a proper coherent statement of the potential effects of developments in Pagham on the local transport infrastructure.

Traffic is not our only cause for concern. We note that all the proposed developments are sited close to the Pagham Rife. The Pagham Rife is a key component in the local drainage system, and is only able to drain into Pagham harbour at times limited by the state of the tide. At other times water accumulates behind the sluice and backs up. The applicants all make reference to the need for sustainable drainage systems. We must emphasise the importance of systems that limit the

rate of run-off into the Pagham Rife, so that it presents no worse a situation than the existing drainage from agricultural land.

We note that applicants have made some assumptions about cycle use, but there is no structured proposal for any new cycle routes. It has long been acknowledged that considerable lengths of the B2166 and the B2145 are unsuitable and unsafe for cyclists. Although we are aware of aspirations for a safer cross-country route connecting North Mundham and Bognor, at the moment the scope for relieving traffic by encouraging cycling is very limited. The application makes no proposals to address the provision of enhanced cycle routes.

We recognise the importance of tourism for the local economy. Part of Pagham Harbour lies within the boundaries of our parish. The increase in the number of buildings and in human activity must have a potential to affect this very significant environment for bird life, particularly where agricultural land close to the harbour is developed for residential use. It is important to maintain a realistic limit on new development. Suggestions that its effects might be mitigated by financial contributions from developers make no sense when it threatens a priceless asset. Wildlife takes no cognisance of District and Parish boundaries, and in this context we are also concerned about the inevitable effects of increased light pollution

In summary, North Mundham Parish Council has serious reservations about the potential effects of these developments, specifically:

- The potential for increased local traffic flow, and the absence of any detailed analysis which comprehends the impact of developments on the A27 and local roads
- The effect of increased traffic flow on pedestrian safety, particularly at junctions
- Traffic pollution from both exhaust fumes and noise, particularly as it affects North Mundham school
- Drainage of surface water and the potential impact on Pagham Rife
- The absence of any realistic cycle routes to ameliorate predicted traffic densities
- The threat to the environment of Pagham Harbour.

It is clear that there is still much to do to produce a proper coherent statement of the local transport infrastructure. Until we are presented with a proposal that takes proper account of the effects on traffic and pedestrian safety in the neighbouring communities we will have no option but to sustain our objection.

Yours sincerely,

Louise Chater PSLCC
Clerk North Mundham Parish Council

Annex: Copy of Response to Earlier Planning Application on this Site

Arun District Planning Applications P/134/16/OUT, P/140/16/OUT. P/6/17/OUT

References:

1. *Arun Transport Study 2016 Stage 3*
2. *Transport Assessment Hook Lane*
3. *Land North of Sefter Road Transport Assessment*
4. *Pagham South Transport Assessment TA/01*
5. *Addendum Transport Assessment ATA/02*

North Mundham Parish Council notes from the recently published Transport Study (Reference 1) that it already embraces the principle of development on these sites. We are concerned that the potential impact on adjacent communities of these three proposed developments has not been properly assessed and appreciated, and on that basis we wish to record our objection.

Our main concerns lie with the potential for increased traffic through the parish mainly, but not exclusively, on the B2166 and Vinnetrow Road - the volume of traffic on Marsh Lane is already an additional issue for local residents. However we also have concerns about drainage, the provision of cycle routes and the effect on the environment.

We have considerable difficulty in presenting a detailed response because we have neither the expertise in-house nor the financial resources to engage specialists to conduct a detailed analysis of the data presented to us. We therefore have problems when presented with data such as paragraphs 4.5 to 4.7 of Reference 5 which quote percentage distributions which total more than 100%.

Our principal concern is that all the data with which we have been presented focuses on traffic flows along the main routes, with no consideration of the effect on side roads at junctions and on the safety of pedestrians. The parish of North Mundham has a primary school adjacent to the B2166 and a nursery school close by. Although there is a single light-controlled pedestrian crossing close to the school, this is of no help to pedestrians attempting to cross the B2166 at other junctions.

We are therefore concerned that none of the applications address the effects of these proposed developments on:

- Local traffic in our parish
- Pedestrian safety
- Traffic pollution - both atmospheric and noise

For example, the Addendum Transport Assessment (Reference 5) considers the junction of the B2166 with Vinnetrow Road and Mill Lane (the 'Walnut Tree' Junction), but does not consider the impact on any of the other junctions in North Mundham, such as the B2166 junction with Marsh Lane and Brookside, and the B2166 junction with Church Road and School Lane.

We are also concerned that the transport assessments only consider the effects on vehicular traffic, and take no account of the safety of pedestrians trying to cross the road at or near these

junctions. For example, the implications for pedestrian safety at the Walnut Tree junction have long been a cause of local concern. In response to these concerns WSCC Highways commissioned a report looking at ways in which pedestrian safety at the junction might be improved, but from which no pedestrian safety measures have yet resulted.

The Sefter Road Traffic Assessment (Reference 3) identified the Walnut Tree junction as a particular concern (paragraph 12.5) and proposed improvements (paragraph 13.5). This proposed improvement is a very short length of additional lane in the approach from the western arm of the B2166. We are not convinced this would do anything to ameliorate the traffic situation and it will do nothing for pedestrian safety. The previous work on pedestrian safety at this junction has indicated that the two lanes on the B2166 where it joins the junction from the east present a particular difficulty for pedestrians trying to cross that arm of the roundabout. We therefore have serious reservations about any proposal to add an additional approach lane on the western arm.

We are particularly concerned that there appears to be no cohesion between the various traffic assessments. For example, considering just the Walnut Tree roundabout:

- The Hook Lane study asserts this junction is close to capacity in the AM peak (Reference 2, paragraph 7.31)
- The Sefter Road study indicates it is operating over capacity in the PM peak (Reference 3, table 12.15)
- The Pagham South study tells us it is approaching capacity in the PM peak with or without development traffic (Reference 4, paragraph 9.12.v)

But the Addendum Transport Assessment proposes no action to mitigate any potential problems, despite the fact that it predicts this junction will reach 91% capacity in the PM peak (Reference 5, paragraph 9.6.vi).

Indeed it appears that the difficulties of local drivers and pedestrians in this parish have received scant consideration. For example the statement in Reference 5, paragraph 9.8 that 'drivers on the side roads will have a choice of routes to take and will no longer appear on a specific side arm if that arm appears to be more congested than an alternative route' makes an unwarranted assumption that there will always be an acceptable alternative route and represents an arrogant dismissal of local concerns.

Despite the predictions of increased traffic flow, none of the assessments recognise the potential for increased pollution of the atmosphere and noise pollution, or offer any measures in mitigation. This must be a serious concern particularly because the playground of North Mundham School is immediately adjacent to the B2166 and at a slightly lower level, and will be affected by both traffic fumes and noise. Other residents of the parish may escape the worst of the exhaust fumes but will find it impossible to avoid the increased noise. We expect to see both aspects of pollution addressed in any assessment of the impact of increased traffic.

We see some significant anomalies between the various individual traffic assessments, which have not been explained in the Addendum Transport Assessment (Reference 5), and which we have already alluded to above. But more seriously, we are far from convinced that Reference 5 has taken proper cognisance of the other potential changes to the boundary conditions of the study

area. It appears to treat the three proposed developments as the only changes to be considered. For example there is no consideration of additional traffic on the B2145 which might result from future developments in Selsey, additional traffic from rat-running on Marsh Lane which might result from the many anticipated residential developments in the Arun District, and traffic on Vinnetrow Road from future developments on the Fuel Depot site adjacent to the Bognor roundabout on the A27.

More significantly, we see no sign whatsoever of any consideration of the potential impact of the various options being considered for upgrades to the A27, and the impact they may have on local traffic. We note that the Arun Transport Study (Reference 1) makes some significant assumptions on the future form of the junctions on the A27 which can no longer be guaranteed - for instance the layout of the A27/B2145 Whyke roundabout (page 29/44) and the A27/A259 Bognor Road roundabout where it is assumed that Vinnetrow road becomes one-way (page 30/44). Although these changes feature in the transport mitigation measures assumed in Chichester District's Local Plan, they would in many cases be entirely subsumed by changes proposed in the various options recently proposed for the A27.

It is clear that there is still much to do to produce a proper coherent statement of the potential effects of these developments on the local transport infrastructure.

Traffic is not our only cause for concern. We note that all the proposed developments are sited close to the Pagham Rife. The Pagham Rife is a key component in the local drainage system, and is only able to drain into Pagham harbour at times limited by the state of the tide. At other times water accumulates behind the sluice and backs up. The applicants all make reference to the need for sustainable drainage systems. We must emphasise the importance of systems that limit the rate of run-off into the Pagham Rife, so that it presents no worse a situation than the existing drainage from agricultural land.

We note that applicants have made some assumptions about cycle use, but there is no structured proposal for any new cycle routes. The Addendum Transport Assessment (Reference 4, paragraph 2.10) has noted that the B2145 and B2166 are narrow in places, and this limits their suitability as a safe cycle route. The proposed alternative makes use of the national cycle route LNR88 from Pagham Harbour to Chichester via North Mundham (Reference 4, paragraph 2.10). Unfortunately the assessment fails to provide a valid explanation of how this route can be achieved. Reference 4 paragraph 5.14 suggests that the link is via South Mundham, but the route indicated is over footpaths - note that the route from the area of North Honer Farm northwards to South Mundham shown in Reference 4 figure 5.3 is a private road which is only dedicated as a public footpath and not as a cycleway.

It has long been acknowledged that considerable lengths of the B2166 and the B2145 are unsuitable and unsafe for cyclists. Although we are aware of aspirations for a safer cross-country route connecting North Mundham and Bognor, at the moment the scope for relieving traffic by encouraging cycling is very limited.

We recognise the importance of tourism for the local economy. Part of Pagham Harbour lies within the boundaries of our parish. The increase in the number of buildings and in human activity must have a potential to affect this very significant environment for bird life, particularly where agricultural land close to the harbour is developed for residential use. It is important to maintain

a realistic limit on new development. Suggestions that its effects might be mitigated by financial contributions from developers make no sense when it threatens a priceless asset.

In summary, North Mundham Parish Council has serious reservations about the potential effects of these developments, specifically:

- The potential for increased local traffic flow, and the absence of any detailed analysis which comprehends the impact of developments on the A27
- The effect of increased traffic flow on pedestrian safety, particularly at junctions
- Traffic pollution from both exhaust fumes and noise, particularly as it affects North Mundham school
- Drainage of surface water and the potential impact on Pagham Rife
- The absence of any realistic cycle routes to ameliorate predicted traffic densities
- The threat to the environment of Pagham Harbour.

It is clear that there is still much to do to produce a proper coherent statement of the local transport infrastructure. Until we are presented with a proposal that takes proper account of the effects on traffic and pedestrian safety in the neighbouring communities we will have no option but to sustain our objection.