

PAGHAM PARISH COUNCIL

The Village Hall, Pagham Road, Pagham, Bognor Regis PO21 4NJ



www.paghamparishcouncil.gov.uk

All correspondence to be addressed to the Clerk

David Easton
Planning Department
Arun District Council
Maltravers Road
Littlehampton
BN 17 5LF

BY EMAIL

1st May 2019

Dear Mr Easton

P/30/19/OUT - Outline application with some matters reserved for the construction of up to 300 No. new homes, a care home of up to 80 beds, D1 uses of up to 4,000 sqm including a 2 form entry primary school, the formation of new means of access onto Hook Lane & Pagham Road, new pedestrian & cycle links, laying out of open space, new strategic landscaping, habitat creation, drainage features & associated ground works & infrastructure. This application may affect the setting of a listed building (resubmission following P/6/17/OUT) - Land north of Hook Lane Pagham

I write to provide the representations of Pagham Parish Council in respect of the above application by the date of 2 May 2019 as specified by Arun District Council.

As is made clear in the description, this is a resubmission of an identical application made under Council ref: P/6/17 OUT which was previously refused by Arun District Council for the reason specified on the notice dated 24 January 2019 which read as follows:

"The 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 concerns resulting from the additional vehicle movements contrary to policy TSP1 of the Arun Local Plan".

The applicants have made that decision the subject of an appeal (PINS Ref: APP/C3810/W/19/3223144) which is to be heard by way of a Public Inquiry currently scheduled to take place on 22/10/19.

Arun District Council has submitted their requisite Statement of Case in respect of that appeal which indicates that the Council intends to defend that refusal reason and the appeal and Pagham Parish Council has been made a Rule 6 party at the appeal and it too has provided its requisite Statement of Case (copy attached) which states that in addition to the refusal reason issued by ADC it considers that planning permission should be withheld for the following reasons:

- i. It has not been demonstrated that the scheme will deliver development of the type envisaged by ADLP Policy SP1a Strategic Approach or a comprehensive, master planned and integrated development which will accord with ADLP Policies HSP2 and HSP2a and related national policy in the NPPF 2019.*
- ii. Given the scale of the development proposed for the site it has not been demonstrated that the site can be developed in a manner that will preserve or enhance the quality and landscape character of its environs, the Bognor Regis to Chichester Gap or existing Green Infrastructure assets or contribute positively to the quality of that environment contrary to policies HSP2, HSP2a, LAN DM1, SD SP3, GI SP1, D SP1 and QE SP1 and, ENV DM4 of the Arun Local Plan (2018) and related national policy in the NPPF 2019.*

iii. Given the scale of the development proposed for the site it has not been demonstrated that the site can be developed in a manner that will preserve heritage assets including the setting of the nearby Grade II listed Rookery Farm and Grade II listed Nyetimber Windmill, contrary to policies, HER SP1, HER DM1 and HSP2a (b) of the Arun Local Plan (2018) and related standing advice from Historic England and national policy in the NPPF 2019.

iv. It has not been demonstrated that the development of the site can be undertaken in a manner that will safeguard the water quality of Pagham Harbour or on site habitats for protected species contrary to Policies HSP2a, ENV DM2, ENV DM4, ENV DM 5 of the Arun Local Plan (2018) and related standing advice from Natural England and national policy in the NPPF 2019.

v. It has not been demonstrated that the scheme will provide for the necessary infrastructure requirements of policies H SP2, INF SP1, INF SP2, T SP1, T DM1, T SP3, W SP1, W DM1 and W DM3.

Given the foregoing and the fact that the current application appears to be identical to that which is the subject of the ongoing appeal, Pagham Parish Council considers that the current application should not be determined by Arun District Council until such time as the outcome of the appeal is known.

However, if the application is presented for determination by officers before that time the application should be refused for all of the above reasons as on the basis of the evidence it has seen, the Parish Council is presently of the view that the above breaches collectively amount to a substantial departure from the aspirations of the recently adopted development plan and that there are no material considerations which justify determining the scheme otherwise than in accordance with the development plan.

Pagham Parish Council requests that this letter and the attached document are placed on both the relevant files for P/6/17 OUT and P/30/19 OUT and reserves the right to comment further in respect of P/30/19 OUT once the many statutory and non-statutory consultee responses in respect of that application are received and made available to us.

Yours faithfully

Nicola Swann
Clerk & RFO
Pagham Parish Council

CC: Karl Roberts, Neil Crowther, Claire Potts