



24 February 2021

Our Ref: OJ/16.154

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**Application P/4/21 Material change of use of land from agricultural use to use for open space.**

In correspondence dated the 13th February 2021, the applicant for the above application responds to my letter of the 11th February 2021 and makes the following assertion:

*"....Policy GI SP1 Green Infrastructure and development together with the related Policy Map for Pagham which together demonstrate that the development plan identifies and allocates the site of my application as Green Infrastructure for the purposes of this policy and its supporting text".*

It is important to correct this so that there is no misunderstanding.

The Application Site is identified on the adopted Local Plan's Policy Map as a 'Strategic Housing Allocation' SD2 Pagham North – see annex 1.

Policy H SP2a identifies Pagham North as providing 800 new homes. This Policy also identifies key design and infrastructure requirements which includes *"provision of public open space including children's play areas, landscaping, drainage and earthworks"*. There is no additional or separate Green Infrastructure allocation in the Local Plan relating to Pagham North.

Policy GI SP1 in fact states:

*"The existing Green Infrastructure Network, as shown on the Green Network Maps for each parish and town, must be considered at an early stage of the design process for all major development proposals".* (emphasis added).

This is clearly an instruction that green infrastructure should be taken into account in formulating development proposals. It is not, as is purported, the allocation of Pagham North for Green Infrastructure at the exclusion of all other uses. Policy GI SP1 does not conflict this Policy H SP2a as is suggested.

Also contrary to what is suggested, there is no Policy Map for Pagham within the adopted Local Plan. Rather, as is explained in para 7.3.8 of the Local Plan, Policy GI SP1 is referring to the 2012 Green Infrastructure Study – see annex 2.

Para 7.3.12 of the Local Plan explains the Green Network Maps in the following terms:

*"The Green Network Maps present the District's existing Green Infrastructure network and should be viewed alongside the Local Plan policies to identify opportunities for protecting, enhancing and connecting Green Infrastructure assets as part of new development". (emphasis added)*

Again, this does not support to the notion that Pagham North is allocated for Green Infrastructure, but rather highlighting that such assets should be considered in the design process.

It is instructive that the Green Infrastructure Study was undertaken prior to the allocation of Pagham North in the Local Plan and must therefore be interpreted in that context.

Lastly, I am also aware of the argument put forward by the Applicant that, because the Council is not able to meet the requirement in the NPPF to identify a minimum of five years' worth of housing (para 73), Policy SP H2a is considered out-of-date and the application for use of the Site as open space benefits from the presumption in favour in para 11 of the NPPF (page 2 of the Applicant's supporting statement).

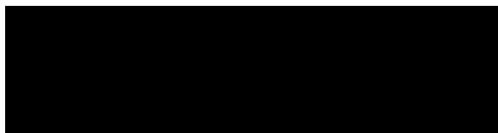
I disagree with this for the following reasons:

Firstly, footnote 7 of the NPPF refers to "applications involving the provision of housing". Clearly the Applicant's intention is not related to the provision of housing and the presumption in favour is not engaged in these terms.

Secondly, it would be irrational, in my opinion, for a policy that intends for a site to be developed for housing not to be afforded full weight in the situation where there is a shortfall in housing land supply.

I trust you will consider this representation in respect of the above application.

Your faithfully,



**Owen Jones**  
**Director**



## Annex 1 – Adopted Local Plan's Policy Map



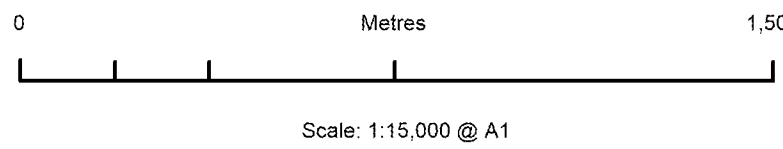


Please note:  
Policies maps should be read alongside other supporting plans including the Waste Local Plan, Minerals Local Plan and Neighbourhood Development Plans.

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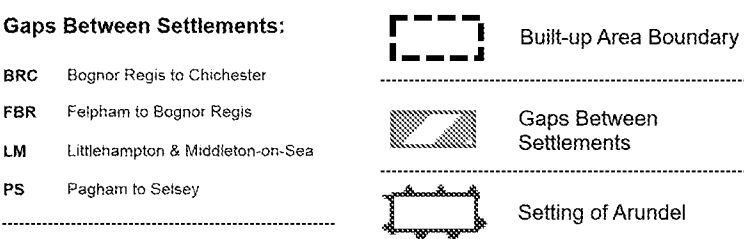
**Bognor Regis & Surrounding Area**

**Map 3**

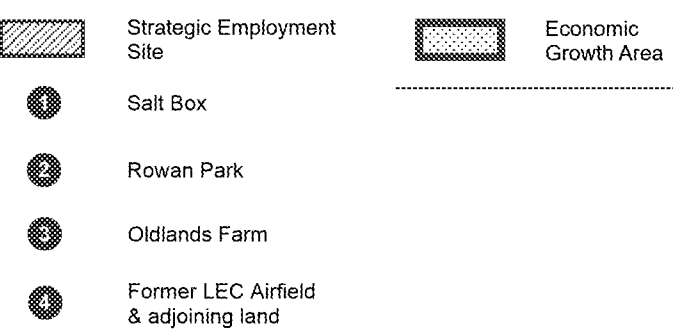


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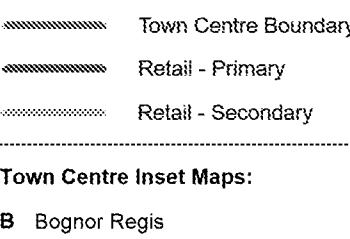
**Chapter 7 - Settlement Structure & Green Infrastructure**



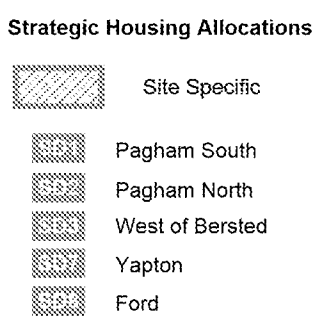
**Chapter 8 - Employment & Enterprise**



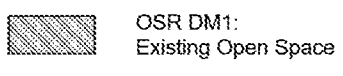
**Chapter 9 - Retail**



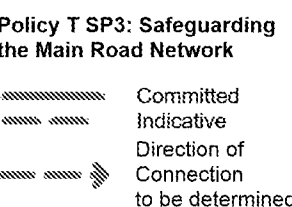
**Chapter 12 - Housing Delivery**



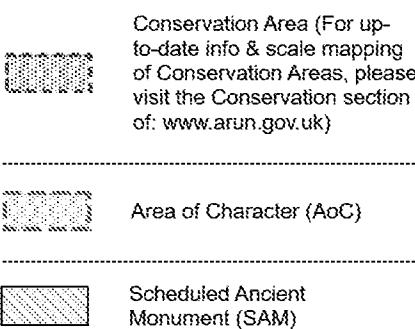
**Chapter 14 - Health, Recreation & Leisure**



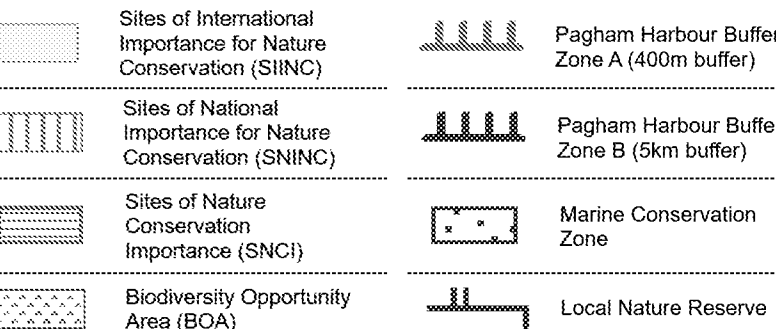
**Chapter 15 - Transport**



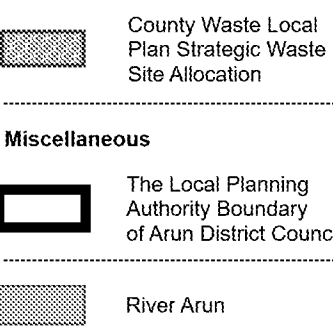
**Chapter 16 - Building Conservation & Archaeological Heritage**



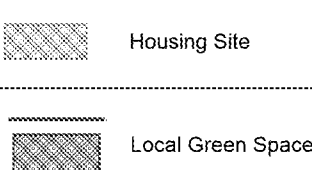
**Chapter 17 - Natural Environment**



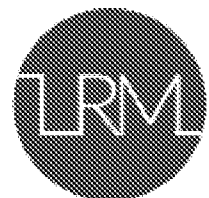
**Chapter 20 - Waste Management**

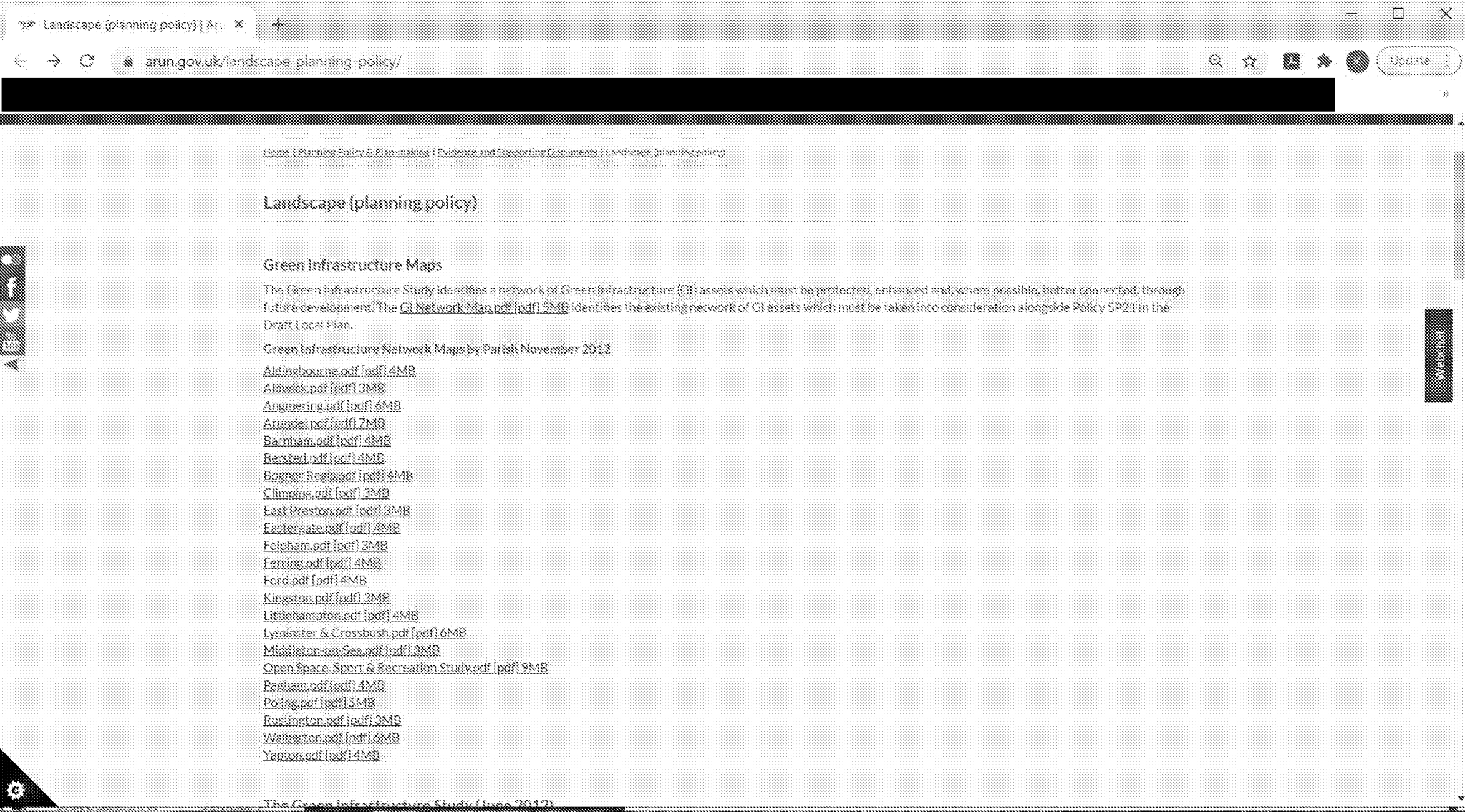


**'Made' Neighbourhood Development Plans**



## Annex 2 – 2012 Green Infrastructure Study





## Landscape (planning policy)

### Green Infrastructure Maps

The Green Infrastructure Study identifies a network of Green Infrastructure (GI) assets which must be protected, enhanced and, where possible, better connected, through future development. The [GI Network Map.pdf](#) [pdf] 5MB identifies the existing network of GI assets which must be taken into consideration alongside Policy SP21 in the Draft Local Plan.

Green Infrastructure Network Maps by Parish November 2012

[Aldingbourne.pdf](#) [pdf] 4MB

[Aldwick.pdf](#) [pdf] 2MB

[Angmering.pdf](#) [pdf] 6MB

[Arundel.pdf](#) [pdf] 2MB

[Barnham.pdf](#) [pdf] 4MB

[Bersted.pdf](#) [pdf] 4MB

[Bosham & Bosham.pdf](#) [pdf] 4MB

[Chichester.pdf](#) [pdf] 3MB

[East Preston.pdf](#) [pdf] 2MB

[Eastgate.pdf](#) [pdf] 4MB

[Felpham.pdf](#) [pdf] 2MB

[Ferring.pdf](#) [pdf] 4MB

[Ford.pdf](#) [pdf] 4MB

[Kingston.pdf](#) [pdf] 3MB

[Littlehampton.pdf](#) [pdf] 4MB

[Lyminster & Crossbush.pdf](#) [pdf] 6MB

[Middleton-on-Sea.pdf](#) [pdf] 3MB

[Open Space, Sport & Recreation Study.pdf](#) [pdf] 9MB

[Pagham.pdf](#) [pdf] 4MB

[Poling.pdf](#) [pdf] 5MB

[Rustington.pdf](#) [pdf] 3MB

[Welbourn.pdf](#) [pdf] 6MB

[Yering.pdf](#) [pdf] 4MB

## The Green Infrastructure Study (June 2012)

The National Planning Policy Framework defines Green Infrastructure as:

'A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'.

Through stakeholder engagement and fieldwork, Land Use Consultants have prepared a study, on behalf of Arun District Council, which aims to identify the strengths and weaknesses of the District's existing green infrastructure network, and opportunities to improve and strengthen the network. By doing so, the study aims to provide the evidence to help shape the future growth in the District and develop a joined up approach to delivering ecological services, recreational benefits, climate change mitigation, adaptation measures and the retention and enhancement of landscape character and distinctiveness across the District.

[Arun's Green Infrastructure Study.pdf](#) [pdf] 4MB presents a Green Infrastructure Framework which will be used as a basis for preparing policies within the Local Plan and will enable:

- The areas of 'highest' environmental value to be identified (environmental value is to be judged by the multiple functions and benefits provided that contributes to the diversity and distinctiveness of the area).
- The areas where there is potential to create high value environments that provide multiple functions and benefits in the future to be identified.
- Local communities and the Local Authority to protect, enhance and create new opportunities for Green Infrastructure in the District.

### List of figures at November 2012

[Figure 2.1 - Key GI Assets.pdf](#) [pdf] 4MB

[Figure 2.2 - Key GI Assets Over 50ha.pdf](#) [pdf] 6MB

[Figure 2.3 - Location of Strategic Gaps.pdf](#) [pdf] 3MB

[Figure 3.1 - Primary Function of GI Assets.pdf](#) [pdf] 6MB

[Figure 3.2 - Access Links & Access to Recreation.pdf](#) [pdf] 4MB

[Figure 3.3 - IMD.pdf](#) [pdf] 2MB

[Figure 3.4 - Conserving & Enhancing Biodiversity.pdf](#) [pdf] 4MB

[Figure 3.5 - Sense of Place.pdf](#) [pdf] 4MB

[Figure 3.6 - Conserving & Understanding Historic Character.pdf](#) [pdf] 4MB

[Figure 3.7 - Productive Green Environments.pdf](#) [pdf] 3MB

[Figure 3.8 - Sustainable Water Resources.pdf](#) [pdf] 4MB

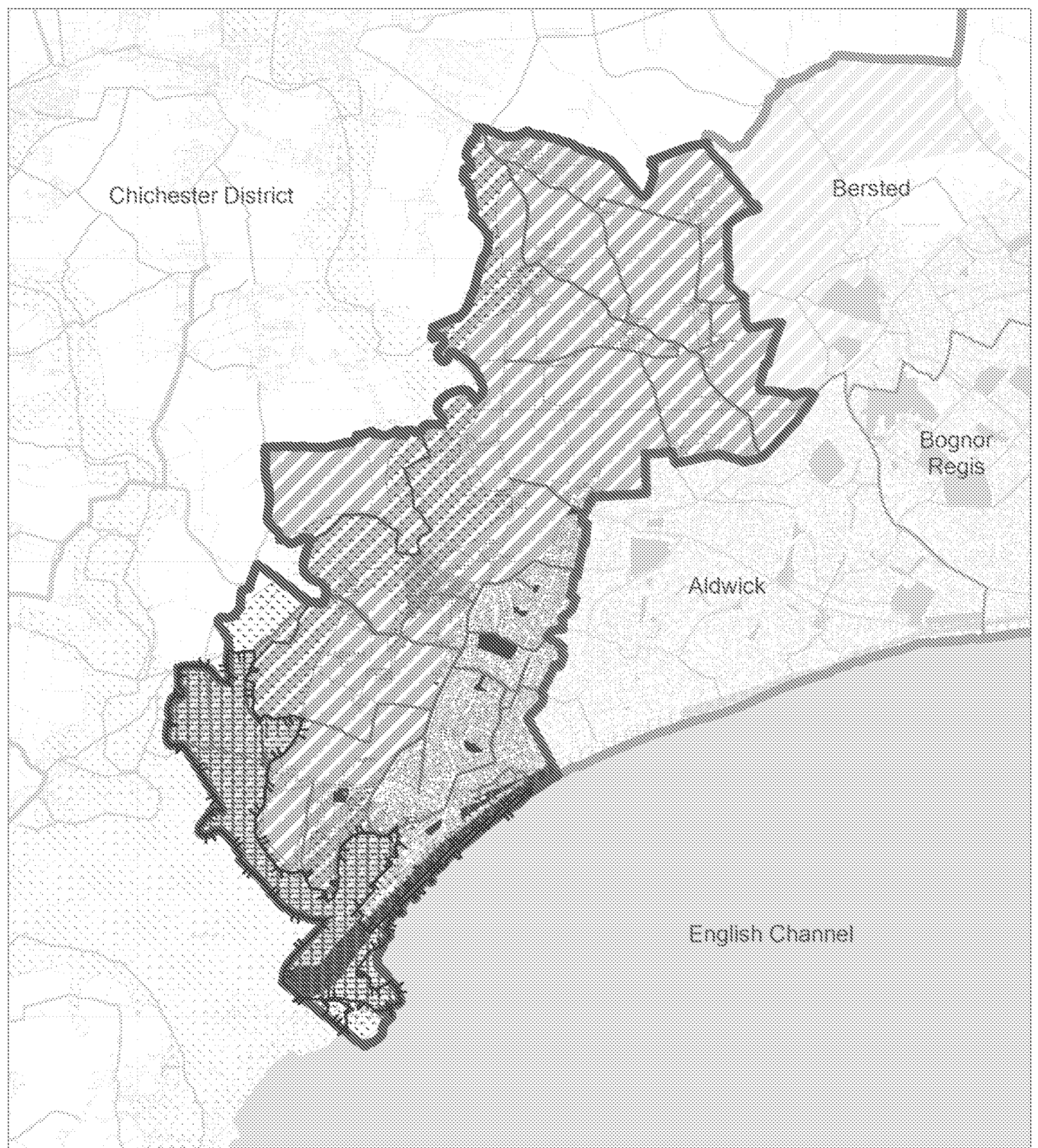
[Figure 3.9 - GI Issues.pdf](#) [pdf] 622KB

[Figure 4.1 - Strategic GI Corridors V2.pdf](#) [pdf] 5MB

[Figure 5.1 - Proposed Growth Areas A3 RevB.pdf](#) [pdf] 5MB

[Figure 6.1 - GI Opportunities RevB.pdf](#) [pdf] 913KB

[Figure 6.2 - Arun GI Priority Projects.pdf](#) [pdf] 697KB



# Pagham Parish

## Green Infrastructure Network

Scale: 1:35,000 @ A4

Hectares of Parish: 1052.8



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### Key:

Arun District Boundary



Parish Boundary



Surrounding Parishes



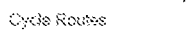
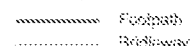
Rivers



Regional Routes



Public Rights of Way



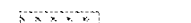
Cycle Routes



Local Nature Reserve



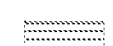
Biodiversity Opportunity Area



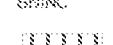
Existing Open Space



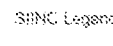
SINCI



SINCI



SINCI Legend



SINCI Legend



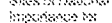
SINCI Legend



Sites of National  
Conservation  
Importance



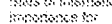
Sites of National  
Importance for  
Nature Conservation



Sites of International  
Importance for  
Nature Conservation



Sites of International  
Importance for  
Nature Conservation



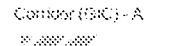
Sites of International  
Importance for  
Nature Conservation



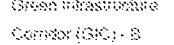
Sites of International  
Importance for  
Nature Conservation



Green Infrastructure  
Corridor (GIC) - A



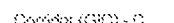
Green Infrastructure  
Corridor (GIC) - B



(Also subject to  
community,  
infrastructure  
and housing  
growth)



Green Infrastructure  
Corridor (GIC) - C



(Employment  
and Education  
Promotion  
Only)



(Employment  
and Education  
Promotion  
Only)