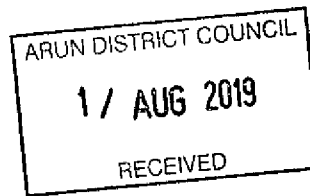


Planning Department
Arun District Council
1 Maltravers Road
Littlehampton
BN17 5LF



12 Laurel Drive
Pagham
PO21 3ND

30th July 2019

Dear Sirs

Re : Planning Application P/58/19/PL for the erection of 9 dwellings. Deadline for objections 15th August.

I would like to object to the above planning application for 8, 3 bedroom, 2 storey houses and 1, 2 bedroom, 2 storey chalet bungalow for the reasons stated below.

ALP 16 Built Heritage - Enabling Development

Enabling Development 16.2.13 'In determining any application the local planning authority will take into account whether:-

- It is necessary to resolve problems arising from the inherent needs of the heritage asset, rather than the circumstances of the present owner.

Potential for harm to the heritage asset

This development application is dependent upon a Listed Building Consent, application ref. P/53/19/L, being approved which will enable access to the development. *NPPF item 190 states "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and necessary expertise. They should take this into account any conflict between the heritage asset's conservation and any aspect of the proposal".*

Many applications for Listed Consent have been made by the Inglenook Hotel for many changes, all of which could result in the deterioration of the setting in the future. *Arun Local Plan Section 16 para 16.2.4 states: "The integrity and authenticity of a Listed Building can be easily undermined by ad hoc or piecemeal alteration. Inappropriate proposals affecting the fabric, character and appearance of Listed Buildings can not only erode the significance and special interest of the Listed Building but could also erode the broader, cohesive character of the locality".*

Permitted access to the new development will cause intensity of use and additional traffic movements in very close proximity to the main building of the hotel and will affect the setting of several trees with Tree Preservation Orders. The rate of 46+ daily traffic journeys daily (Transport Statement) in addition to the everyday car park usage will have an adverse effect on the hotel building from vibration and increased air pollution which could affect the fabric, setting and appreciation of the listed building in the future. It could also have a cumulative detrimental effect on the 4 Grade II Listed Barns immediately adjacent on Mill Farm Estate.

This application cannot demonstrate that the development will preserve the heritage asset of the setting of the Listed Building contrary to policy HER SP1, HER DM1, of the Arun Local Plan (2018).

Protection of trees

ADC Tree Officer's Report 2019 has registered an objection to the proposed development on the grounds that the layout would put undue pressure on and obscuration of the most significant of trees.

This development does not demonstrate that trees protected by TPO's will be protected and is contrary to Policy ENV DM4 of Arun Local Plan (2018)

Potential adverse effect on highway traffic and pedestrian access

The limited widening of the access road and the significantly increase in vehicle movements entering and exiting the site onto the Pagham Road will have an adverse effect on highway safety and convenience of road users. The planning application states the access lane entrance will be widened to 5.3m after re-alignment and a traffic light system will be introduced. There may still be occasion when two cars will be accessing the lane at the same time, therefore one will still have to wait on the pavement area. An example of vehicle widths: A BMW X5 is 2.4m wide, average car 2m, refuse/commercial vehicle 3m wide. It is also proposed that pedestrians will be using a shared surface in the access lane.

Manual for Streets item 6.3.22 states "that a minimum unobstructed width for pedestrians should generally be 2m". Therefore, the width of 5.3m achieved could cause a conflict to arise between traffic and pedestrians.

In addition to residents and guests of the Hotel having to use the access lane, village residents, in particular from Mill Farm and The Mill retirement complex, many with hidden disabilities i.e. sight or hearing impairments (38% of the village is over 65) will be passing in front of the access lane on the pavement and will have to navigate 2 junctions in very close proximity, just to get to the zebra crossing to go to the shops. Cyclists, who appear not to need a bell of warning, will also be using the access lane, crossing the pavement splay to enter and exit the Pagham Road at its narrowest point, whilst trying to avoid cars and pedestrians.

The development access is opposite a bus stop. Cars exiting and entering the access lane will have to overrun the footway to enter the highway traffic. The existing pavement splay creates a small parking area immediately to the north which will restrict their view of traffic entering the village from that direction. Parked cars on the highway opposite the Hotel encourages traffic to use the middle of the road therefore emerging vehicles from the development will be waiting on the footway/splay to enter the Pagham Road at the narrowest section of the highway.

There is a serious lack of parking facilities in Pagham with only 1 non private car park available, therefore, on street parking is the norm. Parking opposite the splay creates a pinch point which is reduced drastically when a bus is in the bus stop. Drivers also tend to ignore and park on yellow lines in part of the parking area, on the pavements outside the Hotel and opposite on the yellow lines. The on street parking along the Pagham Road frequently causes a chicane situation all the way through the village. Unfortunately, due to lack of resources, there is no active traffic enforcement presence.

There are no proposals to upgrade the Pagham Road B2166 and it is one of the most dangerous unclassified roads in the area but the Arun Local Plan gives no mention in its list of transport constraints. In August 2017 it was acknowledged by ADC Assistant Planning Director as to present serious problems.

There will be a very serious cumulative effect on traffic with the many development already planned for the village. The village and the Pagham Road will have to absorb and integrate vehicle and pedestrian movements from the following:-

- Traffic from two junctions existing developments totalling 312 dwellings
- Traffic using 5 junctions from proposed developments coming forward of 1305 dwellings
- Additional commercial traffic i.e. buses, tractors from Barfoots and HGV delivery lorries using the Tesco's junction and delivering to the Pagham Parade Co OP.
- Church Farm visitors
- Finally the existing 3,500+ dwellings of residents of Pagham going about their daily lives

Another junction will exacerbate the existing pressure on vehicles using the Pagham Road and will become increasingly dangerous for pedestrians. It is already at breaking point!

It has not been demonstrated that the development will reduce congestion or provide safe access to the highway network and is contrary to Policy T SP1 of Arun Local Plan (2018)

Sewage Connection

Southern Water is undergoing investigation from Environment Agency for polluting of the most popular beaches by raw sewage and storm water for more than 150 times in six weeks, which includes 6 at Aldwick and therefore assumed but not mentioned, at Pagham.

In response to a consultation request in July 2019 for another proposed development locally, Natural England stated 'not all of the Pagham housing allocations in the Local Plan can be accommodated with the headroom of the existing consent for the Pagham WwTW. Natural England would not accept an increase in the discharge consent for this treatment works, as this would have a negative consequence for the water environment'. No consultation correspondence is on record from Southern Water to confirm that there is capacity or headroom for this development to connect to the existing sewer network.

Drainage

NPPF para 163 states – 'When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere...'

Development Flood Risk Assessment document states the following:-

- 1.3.1 'An intrusive geotechnical has not yet been conducted in relation to the site, meaning it has not been possible to confirm precise underlying soil conditions to assist with the design of sustainable drainage systems'.
- 3.1.5 'The increase in impermeable areas will result in an increase in surface water run-off, mitigated through SUDS methods and techniques (where site condition and constraints allow)'.
- 4.1.2 'a site specific geotechnical investigation has not yet been undertaken...and it has not been possible to ascertain infiltration rates to the underlying soils'.
- 4.3.1 and 4.3.3. 'the foul flow is subject to confirmation from Southern Water that sufficient capacity is available within the existing sewer network and can cope with the increased capacity'.
- 5.1.1. 'A residual risk has been identified in relation to the possible presence of high levels of groundwater, confirmed as a potential risk by WSCC'.

Flood Risk Assessment indication of maintenance requirements of the proposed drainage systems

The drainage system will require extensive maintenance to clear permeable paving, desilt catchpits, rodding of pipework to clear blockages, in order for it to be effective.

The land has been flooded in the past and those with local knowledge, know that the groundwater table is very high (example - Crayfern Development in the adjacent site had to carry out piling before building work could be undertaken). This site is on London Clay with Loamy Soil and has a naturally high groundwater table (Arborcultural Report Feb 2018). Post development the site proposes to have an impermeable area in the region of 0.29ha increased from 0.03ha existing. Their application says that infiltration devices are yet to be decided but that permeable surfaces and filter drains could be implemented but it is unlikely that sufficient levels of infiltration will be achieved in order to benefit the site from a drainage perspective.

The application also states that the existing water course to the south of the site is outside the bounds of the development and out of the developer's control. The Mill Farm Estate lies to the north and west of this development site and is low lying. There are 3 natural springs to the west at the lowest point of the site which Mill Farm pumps continuously, in addition to rainwater run-off, via French Drains into the Rife. The surface water run-off from this development will require a drainage system that is efficient and appropriate and must be capable of protecting the low lying properties surrounding the site. It must be regularly maintained, as per the Flood Risk Assessment recommendations, to ensure there is no undue pressure on Mill Farm's drainage system and that there will be no detrimental effect on neighbouring properties.

It has not been demonstrated that this development has addressed its cumulative effect on foul water disposal, flood storage capacity and surface water drainage and is contrary to the policy W DM1 in Arun Local Plan (2018)

ALP Policy SD SP2 Built Up Area Boundary and Policy C SP1 Countryside

The Council will take into account the cumulative impact of development in the consideration of planning applications. This development site is outside the Built Up Area Boundary. It is not listed as a Brownfield Site, has no agricultural use and is previously undeveloped. (CLG Letter 2010 amending PPS3 to exclude private gardens from the definition of previously developed land). Although listed as Deliverable Site 69 on the Helaa Register, Arun states that 'The identification of sites in the HELAA should not be seen as intention to allocate these sites for development, or that planning permission will be granted'. This development does not satisfy local housing need for affordable, social homes or the needs of a growing elderly population.

Adverse effect on the residential amenity of neighbours

The development will have, by virtue of its height, an adverse effect on the residential amenity of neighbouring dwellings i.e. residents of Mill Farm Estate. The scale of the development does not follow the Aspects of Form and Design Quality in the Arun Local Plan (2018) with regard to Scale, section 13.2.8 and 13.2.9.

Manual for Streets, Principle of urban design - scale is the size of the building in relation to its surroundings. Height determines the impact of development on views, vistas and skylines.

The housing design will be overbearing and visually intrusive and will have a negative impact on neighbour's quality of life by reason of noise, disturbance, loss of privacy, overshadowing. There will be a loss of daylight to south facing gardens and to primary habitable rooms whose right has been acquired by residents with uninterrupted use over the past 20+ years without consent and without threat or interruption.

The developers state that following consultation with the community (8 residents, who did not have access to pertinent design information) the design has been amended. In particular Unit 7 from a 2 storey house to a bungalow, this is in fact a chalet bungalow with 2 storeys! The bungalow is located to the north/west corner of the development and is side facing a resident's property which has been given at 14m from the house, (this is an incorrect measurement as the primary habitable room is closer to the bungalow by approximately 2m). Presumably it will be screened by a dense natural barrier of trees and hedges which will also result in a loss of sunlight in that room. The planting of boundary trees will not be seen by neighbours as 'assimilating into the landscape'.

It is proposed to create natural barriers with the use of trees to absorb sound as the denser a natural barrier is the more effective it will be in lessening the impact. Unfortunately, the impact of creating a dense screen will be the reduction of available natural light into their primary rooms. The 5m vegetative boundary and said natural barrier of trees proposed will also need to be maintained. Will the management company be taking responsibility for the maintenance of vegetation and trees once the development is completed? Who will monitor that the job is carried out regularly to an acceptable standard?

The development will be overlooking the Mill Farm Drive residents, whose homes are of wooden construction and who have to abide by certain rules concerning noise, fires and fireworks and have always had the expectation of quiet enjoyment of their properties. The Mill Farm rules are on record with the Arun District Council as part of the Licence requirements. One of the agreed rules restricts the use of all machinery including grass cutting and pressure washing on Sundays after 1pm and no noise after 11pm. This is what residents have signed up to in their Agreements for the past 20+ years and this development will frustrate that agreement.

This site will not deliver a development that can integrate with the existing environment and is contrary to the policy D DM1 of the Arun Local Plan (2018).

Nyetimber can trace its history back to the 12th century and buildings such as Lion, Bear and Lamb Public Houses, Barton House, Nyetimber House, Nyetimber Mill, Rookery Farm, Inglenook and the 4 listed barns in Mill Farm all add to the character and distinctiveness of the village. All are well known and visitors over the years associate all of these in their memories of good times and holidays past.

NPPF Item 192 says that LPA should take account of :-

c) the desirability of new development making a positive contribution to local character and distinctiveness'

The new development will add nothing to the Inglenook's character and distinctiveness or to the village's character

Pagham Village Design Statement 2007

Most of Nyetimber, consists of 1960's bungalow construction generally semi-detached and mainly of pale brick or colourwash with a variety of concrete pantile roofs. Mill Farm Estate consists of detached single storey properties with low pitch roofs and pastel coloured rendered exteriors. Hard surface construction or landscaping is controlled so as not to have a detrimental effect on site drainage systems within known flood zones and which might be compromised by fluvial or tidal incursion.

This site cannot demonstrate that development would not have a detrimental effect on the adjacent Mill Farm drainage system and is therefore not in line with the development criteria and general conservation policies in the Pagham Village Design Statement.

There will also be an environmental impact on existing mature trees from this development through pollution and vibration from traffic movements 7 days a week. Many trees in the vicinity have preservation orders in place and a further recommendation has been made by ADC Tree Officer to add additional TPO's.

The loss of one of the few open green aspects in the neighbourhood will have an adverse effect on local wildlife. Gardens are mini nature reserves on our doorsteps and vital habitats for all sorts of wildlife. Many much loved species rely on green spaces like gardens, such as the song thrush and house sparrow, both of which have suffered massive declines in the last few years. House sparrow numbers have plummeted by over 60 per cent and we have lost almost 75 per cent of song thrushes. If more garden space is turned into buildings they will likely decline further.

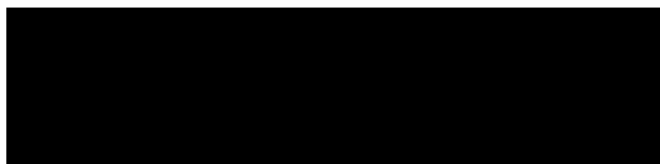
Finally, this development will result in a loss of one of the few breathing spaces left between the existing buildings and surrounding developments. Do we have to build on every bit of green space around us?

I say to Arun District Council, as a concerned member of the public, would it not be better use of public money, time and effort to chase those developments who have already achieved planning permission but are lagging behind with delivery. Instead of having to be bombarded by developers and owners with yet more unwanted and unpopular developments who will take the money and run.

I am reminded of the comment made by an Arun Councillor last year during consideration of another planning application who said that if we, the DCC, are required to approve every development application that comes before us because it is a prerequisite of the Local Plan, why do we need a Development Control Committee.

I therefore strongly object to this planning application for the reasons stated above.

Yours faithfully



**Jane Collins
Chair
Mill Farm Residents Association**

