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cc Mr Nick Gibb, MP, House of Commons

Associated Director Planning & Economic Regeneration,
Arun Civic Centre,
Maltravers Road,
Littlehampton,
BN17 5LF

Dear Sir,

Reference:

SEFTER ROAD WIMPEY Ref P/134/16/OUT
BARTONS FARM (PAGHAM ROAD) Ref P/140/16/OUT
HOOK LANE Ref P/6/17/OUT



While I fully appreciate the national need to build new home to satisfy our ever increasing population, and the pressure and direction on local authorities by central Government to meet new build targets, I have nonetheless some issues in relation to these and other possible developments in the local area. These issues, and therefore potential objection, are not limited solely to the developments referenced above, but also in a wider context embracing other local areas where extensive developments are ongoing or are proposed.

1. Traffic & Highways

Traffic volume and consequent congestion at peak times and in particular at 'pinch' points is increasingly evident, and any further increase in vehicular volume on the present highways infrastructure is totally unsustainable and unrealistic. The developers concerned say traffic studies have been conducted, and one in particular naively stated that there is no problem as their proposals include the building of more local retail outlets and residents will therefore shop locally. Those developers only discuss of course own individual developments so a consolidated assessment is absolutely necessary. A further dimension to this now is the announcement by the Transport Secretary, Chris Grayling, that the A27 Chichester Bypass Scheme is to be cancelled. A primary objective of this Bypass Scheme was of course the *'facilitating of new housing developments'*.

It therefore follows that more study and planning is now necessary. Meanwhile, would it not be prudent for proposed developments and any new builds approved but not yet actually broken ground be suspended until these further studies by Highways England, ADC and WSCC and other relevant bodies have been done to determine implications and capability of the existing junctions, feeder roads and source vehicular volume sustainability and what solutions may still be possible.

The following key points arise:

- 1.1 Traffic studies conducted to date in relation to all developments south of the A27 (by developers, by Highway England, ADC and WSCC) should be released for public scrutiny. These should be in a clear and digestible format (i.e. not the 700-page Traffic Consultation document);
- 1.2 Further studies to be undertaken by Highways England, ADC and WSCC in relation to the A27, to determine capability and sustainability and the actions needing to be taken to cope with expected vehicular activity, and especially in relation to HGV traffic. These studies should be released into the public consultation process;
- 1.3 ADC / WSCC should put together clear and detailed highways strategy proposals and plans to facilitate new developments;

- 1.4 Until and unless points 1.2, 1.3 and 1.4 are satisfactorily resolved and all necessary improvements are in completed, all building developments should be suspended (perhaps other than single house unit planning applications). Meaning, establish sustainable capability BEFORE more development is permitted to take place. Suspension to also apply to house units approved for development but where ground breaking for foundations work has not yet been done.

2. Environment & Natural Habitat

Pagham and its neighbouring parishes are well documented areas of serious flood risk areas as reported in the WSCC report on the June 2012 flood event.

In the light of such report it would surely be appropriate for WSCC and other relevant bodies identified in that report to re-examine the recommendations, conduct a review of the action points identified and carry out a full risk assessment on all developments completed since that report and those now proposed as to efficacy of current flood control measures and any action that may now be incrementally necessary. This I am sure must be very important to ADC and WSCC and their respective Local Planning Authorities seeking to make informed and proper decisions on planning applications in these areas.

There is also some debate arising in relation to SSSI and Special Protection Areas under the EU Habitat Directive. The developers propose to put up bat boxes and take a range of other steps to limit any impact, but it seems that official representations by Natural England, Environment Agency, ADC and WSCC have been somewhat limited, if at all. The developer, Hanbury, has gone on record that they had '*consulted Natural England*' but did not give any indication of the response from HE, if any. They also reported '*the Council's ecological expert supports our approach*'. I would be very interested in seeing this expert's report and perhaps this expert could do a presentation on the matter at a public consultation meeting.

The following key points arise:

- 2.1 WSCC and other relevant bodies to publicise the status of all proposals contained in the June 2012 report, and also review these recommendations and conduct further risk assessment in the light of developments now proposed in Pagham and the local area;
- 2.2 Natural England and the Environment Agency and other relevant protection and conservation bodies to conduct a review of the impact of these and other adjoining developments may have as is required by the Habitat Regulations, which stipulate an obligation to undertake an assessment of the effects of any likely disturbances arising from developments and the integrity of such sites;
- 2.3 A copy of the ecological expert's report that Hanbury Properties referred to should be circulated;
- 2.4 Refer to key point 1.4 which similarly applies to the foregoing points.

3. Facilities and Infrastructure

There is much debate locally relating to the sustainability of local facilities and infrastructure and its capability to withstand further demand arising from incremental housing and population growth. I am sure that Local Planning Authorities have carried out full detailed studies in this regard in order to make informed decision. But ADC and WSCC should make known their assessment of the situation covering care, medical, emergency services and utility services and also to explain the methodology of the LPAs in regard to this when considering development applications.

Southern Water Services is of particular note in relation the expected volumes of effluent, waste water, run-off and water supply demand as some problems are already evident just to meet the present building densities.

The following key points arise:

- 3.1 ADC/WSCC (and Southern Water Services) to make public the risk assessment and service sustainability study, and their improvement plans to handle the projected demands of these and other proposed local developments.
- 3.2 Refer to key point 1.4 which similarly applies to this matter.

4. Agriculture

Some debate is arising surrounding the release of quality agricultural land for development which would thereafter be lost forever under brick and concrete. Understandably residents do not wish to see their enjoyment of their present environment and agricultural outlook disturbed or obscured in any way. But a potentially more serious and relevant issue is some suggestion and comment that land has and is being re-zoned and re-classified in questionable circumstances in order for it to be granted a release for housing development.

Certainly from a developers' perspective, a green and virginal land site is easier to build upon and therefore undoubtedly more profitable than land previously used and necessitating clearance of old structures, foundations and, no doubt occasionally, land contaminated with chemicals, petroleum, etc. This is why developers build a portfolio of land in anticipation of development opportunities and they must have been overjoyed when central Government dismissed and terminated the local County plans.

I therefore suggest it would be in the best interests of all parties concerned to establish the truth of the matter and for ADC / WSCC (or whoever holds the records) to release full information of land which has in the last 10 years been re-classified and which of this is now in the hands of potential developers. If the accusation is unfounded, then the public need to know this.

What also appears absent from central Government's thinking (or has not been fully explained) is whether we are seeing the most logical geographical distribution of housing development. There are many locations in the UK where communities are desperate for employment opportunity after years of neglect and losses of major employers to the area. Are we perhaps consuming too much quality agricultural land that we may regret sometime in the future, yet are ignoring land of lesser productive quality which should be more appropriately designated for development. In other areas we need to give thought to the distribution of housing new builds and the proximity of homeowners' places of employment as this could well be aggravating the traffic congestion issue.

The following key point arise:

- 4.1 ADC/WSCC to provide information on land that has been Grade re-classified in last 10 years.

I am happy to be contacted to discuss any of the foregoing.

Yours sincerely

Keith G Meadmore

The first part of the report deals with the general situation of the country and the progress of the work. It is followed by a detailed account of the work done during the year, and a summary of the results.

The second part of the report deals with the work done during the year, and a summary of the results. It is followed by a detailed account of the work done during the year, and a summary of the results.

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