

Pagham Parish Council

Land North of Hook Lane Pagham. Outline application with some matters reserved for construction of up to 300No. new homes, Care home of up to 80No. beds, D1uses of up to 4000sqm including a 2 form entry Primary School, formation of new means of access onto Hook Lane & Pagham Road, new pedestrian & cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features & associated ground works & infrastructure. This application is a Departure from the development plan

May 2017

Pagham Parish Council has considered application P/6/17/OUT and wishes to OBJECT on the following grounds that this application does not meet the tests set out in NPPF regarding delivering sustainable development for the following reasons:

Theme 1: Building a strong, competitive economy:

Para 21:

“In drawing up Local Plans, local planning authorities should

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth*

....

- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area.*

The applicant has not provided any information related to the economic impact that this development would have on the area, either during the development phase or ongoing. The lack of information in this area is significant as it is considered that this development is likely to have a significant negative impact on the two major industries in the area – tourism and agriculture.

- This development if approved would have a major negative impact on the attractiveness of the area for tourism both during the construction phase and after completion, as it will be very detrimental to the semi rural character which makes the existing village and attractive tourist destination.
- Tourism makes a huge financial contribution to the local economy, not only to Pagham but also to surrounding towns such as Bognor. The owners of the large Church Farm holiday village are most concerned that this and the two associated developments would have a major negative impact on their business and the number of visitors coming to Pagham.
- The loss of a significant amount of prime agricultural land would have a major negative impact on the other main local industry - farming. This land is part of a farming district which is very productive and has become a centre for growing, harvesting, packing and distribution of good quality home grown produce. As well as the unavoidable loss of important food production there would unavoidably be less work for the many agricultural workers currently employed in production and distribution of produce.
- There is very limited employment available locally within Pagham or the surrounding area, except for jobs relating to tourism and agriculture. Hence building housing stock of the type proposed which are suitable for working families would create an unavoidable need to travel outside the area on a daily basis.
- The potential economic benefits from employment during the construction phase would be short lived and in no way can these been seen as supporting sustainable economic growth in Pagham - which is a key requirement of NPPF.
- The only real tangible long term benefit that could possibly apply relates to possible employment at a new primary school. However despite a site for a primary school being included in one of the possible site layouts there is no committed funding from West Sussex for such a development, and during previous discussions WSCC have indicated that they do not

consider this site a suitable location as it is too close to the existing Rose Green primary school, and that they would prefer a more centrally located site in the southern part of the village.

Theme 3. Supporting a prosperous rural economy

Paragraph 28

28. Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighborhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings*
 - *promote the development and diversification of agricultural and other land-based rural businesses*
 - *Support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centers*
 - *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*
-
- Removal of grade 1 & 2 agricultural land from production to build houses inappropriate
 - Redundant and obsolete buildings not investigated for the opportunities they could provide including brownfield sites such as farm yards
 - Type of housing proposed is not affordable to agricultural workers who are often low paid.
 - Businesses which service existing large agri-business should be encouraged to develop and expand in the Parish
 - Destruction of qualities which attract tourists will damage tourism opportunities and economy

See Appendix 2 for further details

Theme 4 – Promoting sustainable transport

Para 32: All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The impact on the road network, specifically the Pagham Road, has been considered by the Council

- Pagham Road is the single access for the community to the strategic road network
- Drainage of the road has always been a problem
- Dangerous – vehicles leave the road and proximity of farm works in field is a concern.
- Significant number of HGV transit journeys upon Pagham Road, together with massive tractor/trailer loads of crop waste to serve the generating system. Consent has already been given for expansion of this business.
- Cyclists – road is unsafe.
- Concern over safety of junction Lower Bognor Road and Pagham Road

See Appendix 2 for detailed comment

Accessibility to local facilities

Whilst the report tries to give the strong impression that many residents would be able to walk to local shopping and health facilities a detailed analysis of the figures and distances shows this not to be the case. Instead this development, covering a large area and being on the periphery of the village, would significantly increase the usage of private cars for local as well as middle distance journeys. As such this site would definitely fail to provide true sustainability in terms of minimising the need for travel by car.

Key Findings from Traffic Survey Commissioned by Pagham Parish Council

Pagham Parish Council commissioned an independent traffic analysis from a specialist transport consultancy (2020 Consultancy) in order to obtain objective evidence of the significant problems already affecting road transportation in the area. The key findings from this survey (undertaken using

automated measuring equipment and done at a relatively quiet time of year when there was little tourism related traffic) are as follows.

- Although the main access road from the village (Pagham Road) is relatively uncongested where it leaves the village, at peak times the volumes are swelled by traffic coming from west Bognor and joining by junctions with Sefter Road and the Lower Bognor Road. These result in significant tailbacks, both for joining traffic and then for all traffic on the B2166 in the Runcton and North Mundham area.
- Only some 40% of the measured peak hour traffic attempting to reach Chichester and the A27 comes from Pagham village itself, the majority originating from Aldwick and Bognor direction (where this development would be sited). This reflects the fact that, although there is little local employment in Pagham, a high proportion of existing residents are elderly/retired and do not need to travel to work on a daily basis. In contrast these proposed developments would attract mainly families and individuals of working age so there would result in a disproportionate increase in peak traffic volumes.
- Congestion in peak hours on traffic approaching the Whyke Roundabout on the A27 south of Chichester (measuring Site 1) is very significant, with over 90% of vehicles measured travelling at low speeds which indicate slow and queuing traffic. Highways England have independently identified this junction as “severely congested”.
- Westbound traffic on the B1266 approaching the junction with the B1245 (where the traffic merges with traffic from Selsey) was also significantly congested in peak hours with slow and queuing traffic measured.
- Although the traffic leaving the B1245 prior to this by turning north onto the Vinnetrov Road was not measured this will ultimately join the A27 at the Bognor Road roundabout, and it is well known that significant traffic queuing occurs all the time at this junction, even in non peak hours. Again Highways England have independently categorised this junction as severely congested.
- Although the majority of congestion recorded affects northbound traffic, southbound traffic on the section of Pagham Road above the junction with the Lower Bognor Road recorded the highest peak hour traffic volumes. This can be interpreted as reflecting the fact that actual northbound traffic volumes could be significantly higher than those measured were it not for the congestion affecting northbound routes.
- As Pagham is a significant area for tourism the volumes measured during this survey taken in January would be expected to be significantly higher if the measurements were taken in the summer period. In particular the Church Farm holiday village has the potential to generate many hundreds of additional daily vehicle movements when fully open.

The consultants have considered the possible impacts of this development alongside the other 2 major developments ‘masterminded’ by Arun District Council (Sefter Road and South of Summer Lane). They have concluded that the proposed development sites will have a substantial impact on the wider local road network and strategic road network (rather than the immediate local road network) and that it is crucial the entire road network is considered when determining the impact of this application.

They identified that one of the major reasons for the existing congestion on the B2145 is due to the congestion experienced on the A27 by-pass during peak periods. This level of traffic creates difficulties for traffic to exit the B2145 safely. Therefore the proposed developments would significantly impact a

strategic route which is already operating over capacity– and plans for improving the A27 have now been dropped for the foreseeable future.

Theme 6: Deliver a wide choice of high quality homes:

Para 50: To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should

- Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand

Although there is limited information contained within this outline application specific to the design of the homes that would be developed the following points are clear.

- The type and density of housing described in this application would be very much at odds with the existing character of the village and do not reflect the local needs as clearly identified in the Pagham Neighbourhood Plan. They are also not in line with ADC's Housing Needs Evidence Final Report September 2016, having a much higher proportion of larger homes (30% rather than the recommended 10-15%).
- The demographics of the area clearly identify a need for housing to suit the more elderly residents who choose to live in Pagham because of its sympathetic environment and who are not discouraged by the poor transport links and lack of local employment opportunities. Despite this the proposed home types are predominantly biased towards larger 2 storey family homes of up to 5 bedrooms which are unsuitable for this type of resident and likely to attract working age families who will unavoidably add to the existing chronic traffic congestion.
- The comprehensive survey carried out as part of the preparation of the Pagham Neighbourhood plan clearly identified 2-3 bedroom bungalows as the type of new property most needed in the area and that larger 4+ bedroom homes were not required. Historically there has been very little demand for 4 bedroom homes in the area, especially those built in recent years on relatively smaller plots, such as would be the case with this proposal.

See Appendix 3 for detailed comments

Theme 7: Requiring good design

The applications are for outline consent – the final detail will be presented for approval under “Reserved Matters” in due course. In some instances the plans currently presented indicate a greater density of dwellings than that of the immediate existing development. We contend that this would be out of character with the locality and would also contribute to a significant degradation of the streetscape. It will be essential for those features to be addressed either beforehand or at the time of the “Reserved Matters” planning submission. The guiding document in this situation will be the “Pagham Village Design Statement 2007” which was produced in partnership with the Local Planning Authority and subsequently adopted by them as a material planning consideration. This document has proven to be of immense value in regulating potentially disruptive, out of character development and should not be disregarded by developers. It is important that new properties do not present unacceptable features to others nearby. Great care should be taken to avoid overlooking or out of character balconies or roof structures. Materials and finishes should reflect the existing character of the locality. Proposals for 15 metre high dwellings in a predominantly single storey (bungalow) area should be refused.

Theme 10: Meeting the challenge of climate change, flooding and coastal change

Para 100: "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by a Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk based approach to the location for development to avoid where possible flood risk to people and property and manage any residual risk....."

Para 102. If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the Exception Test can be applied if appropriate. For the Exception Test to be passed:

- *it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and*
- *a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Both elements of the test will have to be passed for development to be allocated or permitted.*

Para 103. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- *within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and*
- *development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.*

It is considered that the Flood Risk Assessment and Drainage Strategy prepared by WSP is seriously flawed as there are several parts which are either incorrect or misleading.

To summarise

1. The report fails to fully consider the potential groundwater levels. An assessment during wet winter periods needs to be undertaken and cross referenced to the groundwater levels at Chilgrove monitored by the Environment Agency.
2. The report places a heavy reliance on both the culverts and on-site/downstream being capable of receiving surface water flows from the development but no detailed analysis has been undertaken to confirm this.
3. The allowable surface water discharge should be based on the developable area of and not for the whole site.

4. The FRA makes comments which are considered by us to be inaccurate and misleading. Eg Standard of protection offered by the sea defences
5. A full hydrological assessment should be undertaken on all the ordinary watercourses on/adjacent to the site to assess their capacities, direction of flows and existing culverted restrictions
6. The Existing Sewage Treatment Works is currently unable to cope with existing flows so will not be able to receive flows from this development unless major improvement works are undertaken. These need to be identified at the outset before any application is determined.

Based on the above comments the Parish Council is of the opinion that further work is required to substantiate the conclusions reached in the FRA and without this information the application must be rejected.

See Appendix 5 for detailed comments

Theme 11: Conserving and enhancing the natural environment

Para 109: The planning system should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;*

Para 117: To minimise impacts on biodiversity and geodiversity, planning policies should:

- *plan for biodiversity at a landscape-scale across local authority boundaries;....*

Para 118: When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:.....

- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;*

Para 120. To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

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Paragraph 109 protecting valued landscapes and soils - minimising impacts on biodiversity – remediating derelict land, other relevant paragraphs contraindicating this development are: -

- | | |
|---------|---|
| 110 | Land should be allocated with least environmental or amenity value. |
| 112 | Use only poor agricultural land |
| 114 | Maintain character of undeveloped coast |
| 117,118 | Take account of wildlife corridors and impact on areas designated SSSI, SPA, Ramsar, and SPC, mainly found in and surrounding Pagham harbour. |

The site contains streams, treed hedgerows, and ditches which are clearly ancient (dating from 1600) judging from the diversity of species present. The hedgerows and streams provide and are part of an important coastal plain network of corridors and flightpaths for moths, butterflies birds and bats linking Pagham to Pagham Harbour LNR and Oving, Boxgrove, Eartham and Slindon woods via the rife and the river Lavant. Mammals also using these corridors include water voles, hedgehogs, deer and badgers to name but a few.

The treed hedgerow (referred to as a mixed broad leafed hedgerow) scheduled for partial demolition is likely to be several hundred years old as Hook lane has existed as a route to Sefton and Seenham Green and Rose Green. These were established as hamlets in the ordinance survey map of 1813. The number of different species per 100 yards is in excess of 4 in many places indicating stretches of ancient hedgerow.

The dismissing of many trees in the demolition zone trees as 'species poor' hedgerows contain Oaks, Ash, Field Maple and willow. The hedgerow has clearly existed since before 1813 as it has not changed in shape or name since then. Oaks and other native species are the best for wildlife. Oak supports over 300 types of birds, animals, and invertebrates - the more misshapen and covered in ivy the better. In particular birds and bats might well be nesting, roosting or hibernating in them. The hedgerow is also an important wildlife corridor which will be broken once a large access driveway is driven through. There are photographic records of geese on all the fields surrounding the LNR Pagham Harbour Nature reserve. Photographs should be taken in midwinter in severe weather.

The ditches and streams running through the site contain water voles (wrongly identified in the past as rats) which would be disturbed and lost by this development. They are also connected to the treed hedgerows and woodlands north of Sefton Road. Destruction of part of these hedgerows for access would ruin them as a wildlife corridor and flight path for Land Mammals, Bats, Birds, Newts, frogs, toads, slowworms, moths and butterflies. The disturbance caused by the building will complete the habitat destruction which will not be repaired by mitigation monies of £1275 per unit built. (Wildlife and countryside act 1981 and related acts)

The Sussex biodiversity record centre information for 15th March 2017 shows high numbers and variety of wildlife sheltering in this site and ecosystem.

The site is highly fertile moisture and nutrient retentive grade 1 agricultural land or potentially grade 1 land in the Manhood Peninsular one of the most productive areas in the country with a very long growing season and most sunshine hours. The Manhood Peninsular produces 10% of Britain's vegetables and fruit. The loss of top quality growing areas is unacceptable in this age of increasing population in Britain. We are now only 50 to 60% self-sufficient in food and in the 1960 and 1970's we had a food surplus. Building on greenbelt top quality agricultural land in one of the best growing areas in the country makes absolutely no sense.

The soil is London clay which contains a high proportion of sand and silt making it very liable to solifluction in periods of high rainfall and destructuring as occurs in a building site. The artesian chalk and gravel aquifers underneath exploited by local farms and nurseries are likely to form overland streams causing a flooding problem in Aldwick and Pagham flooding local houses and blocking the Pagham Road (as happened in 2001 and in June 2014 – to quote just few of the many occasions).

When flooding and high rainfall occur, the Summer Lane sewage works is overwhelmed and raw sewage is discharged into Pagham Harbour Local Nature Reserve. This occurred 55 times in last 6 years (since 2011). Swales and ponds do not solve the problem they merely delay it for a few hours. Tapping into existing drains is insufficient (SUDS – sustainable urban drainage). Building 200 to 300 houses and covering a large proportion of the field in concrete is not going to help.

Paragraph 108 of NPPF: - 'Local Authorities should ensure developments are not limited in life by coastal change.' The gravel aquifers connect to the sea and only permit drainage at low tide. It also worth pointing out that much of the site is only 4 metres above O.D. Newlyn which means that it could flood in the future with sea level rise and a bad storm surge coming up the rife.

For all of the above environmental reasons I strongly suggest planning permission is refused as the environmental impact inflicted is unacceptable. Many of the reasons why planning permission was refused in 2000 for Hook Lane are still extant. It will inflict environmental vandalism and unsustainable housing numbers on the pretty and very old hamlet of Pagham. (Thomas a Becket church dates from circa 800). We are not against sustainable development. In our neighbourhood plan survey we suggested a number of 100 to 135 houses. Just fulfilling quotas by inflicting unsustainable numbers, doubling the population of Pagham on a number of Greenfield sites, is not an appropriate or intelligent answer. Why are we not exploiting large Brown field sites such as Ford, Tangmere, and Shoreham aerodromes and also derelict farm yards?

Comments from David Huntley (*Chair of Pagham Planning; B.Sc. Horticulture, lecturer in Arboricultural Science, Pagham and Nyetimber tree warden*)

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The Parish Council does not believe that the applicant has fully considered the pollution implications in relation to the foul water discharges. This is particularly noticeable in the **Preliminary Services Appraisal** submitted with the application.

In this report relating to Foul Drainage it is clearly the intention to install a new foul drainage pumping station and rising main that will go from the site direct to Pagham Sewage Treatment Works.

This is contrary to what Southern Water Services have said to Pagham Parish Council. Southern Water have written stating that the foul water will go to Ford WWTW **not** to Summer Lane WWTW.

This is confusing as also in the applicants Statement of Community Involvement in para 4.11 it also clearly states that foul water will be going to Summer Lane WWTW.

On the 8th February 2017. Southern Water wrote to Pagham Parish Council stating:

The Environmental Information Regulations 2004

Request for Information

Thank you for your request for information which we received on 19 January 2017. We have dealt with your request under the Environmental Information Regulations 2004. This letter provides the response to your request, which reads as follows:

We write to you as concerns have been raised as to the capability of Summer Lane WWTW to deal with the existing sewage requirements of the area.

Could you please provide us with data from 2011 on the number of times this Works had to discharge untreated/not fully treated sewage into the Pagham Rife either due to high rainfall or temporary failure of the plant?

Additionally, you may be aware of 2 large scale residential planning applications with Arun District Council P/134/16/OUT and P/140/16/OUT with another large one due to be submitted. All of these proposed houses will discharge their sewage effluent to the Summer Lane WWTW . What are your requirements to upgrade these works to cater for these additional houses if planning permission was granted and would these be implemented prior to any of these developments being built?

I can confirm that Southern Water does hold information of the type you have requested as follows:

Having reviewed our records, Southern Water have accumulated a total of 55 incidents that we have reported to the Environment Agency from January 2011 to October 2016.

With regards to the planning applications, I have liaised with our Developer Services Team, who have confirmed the following:

RE: P/134/16/ OUT – The assessed connection point in the road is at manhole 9302 which discharges into Ford WWTW, not into the Pagham site.

From this, it is clear that the Summer Lane WWTW cannot cope with current discharges with 55 incidents over the last 6 years!! It is unbelievable that Southern Water would even consider any additional foul discharges to a plant that cannot cope on a regular basis. This untreated sewage goes directly to Pagham Harbour which has the highest European Protection under the Habitats Directive.

Until the Summer Lane WWTW has improvements undertaken no new development should be granted planning permission.

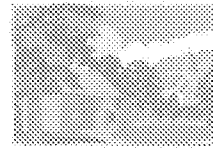
Appendix 1 – Comments on Theme 1 (Building a strong competitive economy)

- Pagham is a well established tourist destination, partly because of its attractive seaside location combined with a rural landscape and historic village. There is a very large holiday complex at Church Farm which has hundreds of holiday homes, a large indoor swimming pool and golf course and which brings in many thousands of visitors each year. Inbound tourism makes a huge financial contribution to the local economy, not only to Pagham but also to Bognor, Chichester and other nearby towns and villages. If this application was to go ahead, especially if combined with the two other major developments at Pagham South and Sefter Road (which is Arun District Council's objective), then the negative impact on tourism is likely to be very significant.
- This site is adjacent to and highly visible from the most used route down into the village by visitors (i.e. Pagham Road) by which the majority of tourists travel down into the area from Chichester and the A27. The sight of such large housing developments surrounding the village when first approaching would be hugely detrimental to the initial impressions of what is currently an attractive semi-rural tourist area, with rustic features such as the windmill at Mill Farm. Visitors would also have to share this route during the building phase with heavy vehicles from the construction traffic, further undermining the attractiveness to tourists.
- If the area is made less attractive to tourists then there would be a significant loss of local jobs, and reduced incoming spend from those coming into Arun from other areas (especially London and surrounds) for leisure and tourism reasons. The owners of the Church Farm holiday village are very concerned that this and the two associated developments would have a major negative impact on their business and is likely to significantly reduce visitor numbers to this part of West Sussex (see attached letter).
- Another local attraction that brings in significant numbers of visitors is the Pagham Harbour Nature Reserve, managed by the RSPB. This nature reserve is a designated Site of Special Scientific Interest and RAMSAR site and so also attracts many other types of visitors. Again the visual changes to the village environment can only have a negative impact on the visitor numbers.
- A good demonstration of the positive contribution from current tourism levels is that although it is a relatively small village Pagham has four long established very successful high quality public houses with full restaurant facilities that are well used throughout the year, not just in the summer tourist season.
- The loss of prime agricultural land would also have significant negative impact on the other main local industry - farming. As well as the obvious loss of crop production from this high grade agricultural land (which benefits from one of the highest rates of sunshine hours anywhere in the UK) there would unavoidably be less work for the many agricultural workers involved in production and distribution of produce. The supply of home produced food products is increasingly important because the increased global demand for food products from major developing countries such as China means we must reduce our reliance on imported food products.
- There is little local employment available locally except for a limited number of well filled jobs relating to tourism and agriculture. Hence building housing stock for families and younger people as proposed would create an unavoidable need to travel outside the area on a daily basis for those of a working age. There is no railway station in Pagham which means that initial travel by car or bus would be essential for almost all the new residents of this development commuting to work. This would put substantial additional strain on the local roads which are already heavily congested at peak times – as evidenced both by recent traffic surveys and by

Highways England themselves. As the existing population contains a very high proportion of retired residents the need for rush hour travel is currently significantly lower than would be normal for a population of this size. Despite this there are major delays and congestion on the major northerly and western routes out of the village as evidenced by recent traffic surveys and confirmed by Highways England themselves.

- The potential economic benefits from employment during the construction phase would be short lived and in no way can these be seen as supporting sustainable economic growth in Pagham - which is a key requirement of NPPF. Given the shortage of local labour with the appropriate skills this work is almost certain to be undertaken by contractors brought in from outside the area for the duration of the build. Apart from day to day subsistence spend it is likely that the large majority of this income will go back to their home areas or countries and not significantly benefit the local economy.
- The only possible tangible long term (i.e. sustainable) benefit relates to employment of staff at a new primary school. However this is most unlikely to materialise as although there is possible provision for such in one of the options shown there is at best only a one in three possibility that a school would be built here rather than at one of the other two nearby proposed development sites (which also both make provision for a primary school). The plan does not provide for any funding of the school building, and there is no committed funding from West Sussex for such a development. Additionally WSCC have stated (during preparation of the Neighbourhood Plan and more recent contacts) that they do not consider this a suitable location because of its proximity to the existing Rose Green primary school, and even if they had funding available they would prefer a more central site in the southern part of the village.

Appendix 1a – Letter from Church Farm re impact on tourism.



Church Farm
Holiday Village

Church Farm Holiday Village
Church Lane
Pagham
Near Chichester
West Sussex
PO21 4NR

Ray Radmall
Pagham Parish Council
The Village Hall
Pagham Road
Bognor Regis
PO21 4NJ

March 21st, 2017

Reference: housing, traffic, sewerage

Dear Ray

Thank you for the recent updates and correspondence. As always we are delighted by your efforts to represent the interests of the local community in your role.

I am sorry for the tardy nature of this letter, resort opening has been rather demanding on our collective time in recent weeks

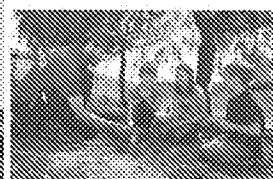
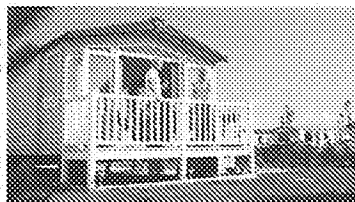
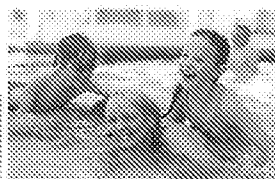
There are a few questions that you asked me to comment on in relation to our site. Set in context they are as follows;

Background of Church Farm

Church Farm has been owned and operated by Bourne Leisure, Haven Holidays, since 1988. The resort has traded as a caravan holiday park for approximately 70 years. We maintain a site with circa 900 units of caravan accommodation. Of this, approximately 650 are privately owned and 250 are rented on a holiday let basis weekly. We turn over approximately 18 Million pounds on this site trading between March 1st and November 1st. We close for 4 months annually allowing winter to pass and refurbishment works to take place. None of our customers live here residentially.

Traffic and visiting guests

Our business is very seasonal. In March on a typical weekend we may have 500-800 people on site supported by some 100-150 cars coming and going locally. At school holiday times and in the summer season we can have up to 4000 people on site and I would anticipate some 800-900 cars will access the site daily. Monday and Friday are real pinch points as 250 holiday maker families come and go over a 4 hour period with approximately 300 cars heading each way -- arriving and departing guests come twice weekly. We also have a large influx of caravan owners to the site on a daily basis and they frequent local attractions and have many visitors. I would anticipate at busy times in the region of 2-3 thousand car journeys happen to and from the site daily over a 24 hr period.

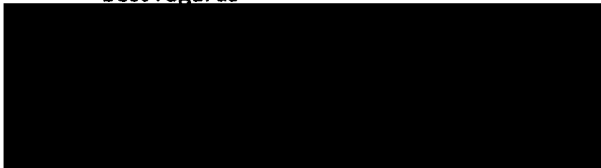


Sewerage background and information

We house an adopted sewerage relay station on resort. This is not owned and operated by us rather Southern Water. Our land is at a low point of the local community and in recent years we have been subject to significant sewerage flooding when the local homes sewerage that passes through us via a gravity fall incoming sewer main to a pumped rising main which becomes overwhelmed or is turned off remotely when other local stations cannot cope with demand. This happens in the open and closed periods of our season and at times can last 4-5 days. During overtopping events we are forced to pump this to avoid office and property loss. During periods of high rainfall these sewers have repeatedly surcharged with mixed grey water and in some instances raw sewerage. This is all logged with the environment agency and should be a matter of public record. This pumping station and rising main in our professional opinion is not sufficient to deal with the volumes of sewerage that it deals with despite recent investment and low level investment. Frequently tankers, provided by Southern Water, are required to attend site over long periods to assist with alleviating the flooding and overtopping issue followed by cleanup crews

I am happy to comment further to these matters and remained somewhat concerned that whatever is proposed locally is properly considered by those planning it

Best regards



General Manager

Theme 4: Appendix 2 – Detailed Comments

Accessibility to local facilities

The developers report refers to proximity of houses to local facilities and suggests that “the site is therefore considered in a sustainable location which is supported by a variety of local services within a 10 minute walk”. This is misleading and not supported by the following facts:

- Only a small proportion of the homes (those sited closest to Hook Lane vehicle/pedestrian access points) actually fall within the quoted preferred MAXIMUM recommended walking distance to Town Centres (i.e. local shops at Pagham Road or Rose Green) Few residents would live within the ‘Desirable’ or even the ‘Acceptable’ walking distances quoted in this report and the likelihood is that most shopping trips will be made by car, not walking or cycling.
- Parking near both the local Tesco Express and the parade of shops at Rose Green is limited and already overcrowded. In the case of Pagham Road on-road parking nearby can lead to dangerous obscured view of the adjacent pedestrian crossing.
- The Tesco Express store in Pagham Road does not have any proper facilities for cycles to be left securely, i.e. no bike racks.
- The reference to local parade of shops at Rose Green includes Barclays Bank – now closed, as is the NatWest Branch in this area. Perhaps the fact that Barclays has become an undertakers and NatWest a charity shop demonstrates the type of community that the local services are focused on!
- The same will apply to travel to the local health facilities and library which are also well outside the maximum recommended walking distance. Again travel by car is almost a certainty.

Theme 4 – appendix 2 – Detailed comments

Pagham road is the single access for the community to the strategic road network. It is a winding, undulating country lane, originally intended to serve a series of small rural farmsteads. When coastal development proceeded in the 1960's the original tiny settlement expanded, the road was resurfaced, but its original character remained. Drainage of the road has always been a problem, as it is flanked for a considerable length by intensive farming and deep roadside ditches. In places ditches are less than 2ft from the road edge. Vehicles are often witnessed either in ditches or through hedges or farm fences into crop fields adjacent. Farmers have complained of dangerous near-misses of their agricultural workforce. The most prominent agricultural business is that of Barfoots of Botley, who grow, process and deliver fresh produce direct to major supermarket chains. Their business is heavily industrialised, with a massive processing, packing and chilling facility. On site, they have a large bio digester facility which provides the whole enterprise with electricity and sells the surplus to the National Grid. The result of this very worthy and efficient enterprise is to impose significant HGV transit journeys upon Pagham Road together with massive tractor/trailer loads of crop waste to serve the generating system. The latter frequently results in soil, slurry and crop waste on the road. These issues all contribute to the main access serving our community often being below an optimum safety expectation.

Consent has already been given for a series of large horticultural glasshouses on adjacent land, together with a further expansion under consideration for yet another large expansion of the processing and packing facility. These very large HGV vehicles already cause much concern. There are significant numbers of migrant workers and drivers employed in this business. Sometimes they take a wrong turning, get lost and resort to problematic manoeuvres to extricate their vehicles. Road edge markers (dolly boards) and even the Vinnetrow Road/B2166 roundabout show signs of HGV impact and damage. Pagham Road has areas of adverse camber, cross fall and road edge damage. Ponding and drainage across the road from adjacent fields all contribute to potential hazard, particularly as a result of heavy rainfall or frost. Road conditions thus prevailing are well known to local folk, who seek to drive within these limitations. Nevertheless, many accidents have occurred, thankfully significant numbers have been minor and remain unreported.

The unclassified part of Pagham Road (viz. from the Royal Oak southwards) was stated by the Highways Superintendent at WSCC Highways & Transport Committee in 2012 to be "the most dangerous of its type in the County". The road is certainly unsafe for cyclists, as road edge damage often occurs (potholes) and there is little opportunity for avoiding action due to ditch proximity.

The road is frequently gridlocked at heavy usage (commuter) times. Personal experience provides examples such as 42 minutes from the Royal Oak junction to the B2145 roundabout.

On four occasions when PPC Councillors conducted 2 1/4 hour sessions of traffic analysis, no less than 9 instances of emergency braking were observed at the Lower Bognor Road junction, in avoiding potential collisions with traffic emerging onto the Pagham Road.

Our professional traffic analyst has stated the cost of seeking to upgrade this road to a standard appropriate to being able to safely cope with the additional traffic resulting from the imposition of the expected strategic housing allocations for Pagham would be far beyond any cumulative s106 funding. Traffic surveys were taken by the applicant when the tourism centre of Pagham (Haven Holidays Church Farm) was closed. The results are therefore not representative of the real seasonal traffic burden on the

access to the strategic road network – Pagham Road. The consultants commissioned by the Parish Council have taken this into account and their results are significantly more accurate.

We present these results for dedicated consideration as they do properly present the reality of the serious, often dangerous, traffic situation we face.

Traffic Survey Commissioned by Pagham Parish Council

Please see report from 2020 Consultants

Theme 6: Appendix 3 – Detailed Comments

There is very limited definitive information as to the detailed design and types of the housing that the developers would plan to build contained in this outline planning application. However from the information that is provided on housing numbers and home sizes (2-5 bedroom homes) it is easy to see that the development would fail to meet the NPPF criteria on the following areas.

- Although there are a number of references to the design of housing being consistent with the existing village homes (and the Village Design Statement) it is clear that the high density of the new housing relative to adjacent neighbourhoods would make this impossible. The existing housing stock in Pagham consists predominantly of 2 and 3 bedroom bungalows on good size plots, which have proved to be the most popular types of property for those moving into the area.
- Despite the demographics of the area clearly identifying the major need being for housing to suit the more elderly residents, who find the area attractive and who are not discouraged by the lack of local employment and significant transport problems, the proposed home types are very much biased towards larger family homes. According to the Design Statement some 60% of the planned homes would be 3 to 5 bedroom 2 storey houses, which would undoubtedly attract working age occupants.
- A comprehensive survey was carried out among local residents as part of the preparation of the Pagham Neighbourhood plan. This provided a lot of detailed information about the types of new homes that it was felt should be built in Pagham. There were over 600 respondents to the NP survey and all of these lived within the village of Pagham. This compares with only 94 respondents to the developers own feedback forms, and this would have been open to anyone who attended their public exhibition, not just local residents.
- In terms of property types the most wanted type (prioritised by over 60% of respondents to the NP survey) were 2 or 3 bedroom single storey bungalows and only 12% of the respondents thought that any 4 bedroom houses should be built. In contrast some 30% of those included in this proposal would be 4 or 5 bedrooms.
- Additionally in the course of interview with the main local estate agent it was stated that it had proved difficult to sell the few recently built 4 bedroom homes within the village because the plot sizes were too small, especially compared with established village properties.
- The mix proposed in this application is not in line with Arun's proposed figures and has not taken account of local demand. A.D.C.'s Housing Needs Evidence Final Report September 2016 suggests this mix should be:

1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
5-10%	40-45%	35-40%	10-15%

- Less than 5% of local residents thought that a few large developments of the sort described in this application (between 250 and 280 homes) were the most appropriate way of adding new homes. Over 70% wanted development to be done in small increments.

- The site in question was actually the second most objected to of all the seven major sites around Pagham that had been identified as possibilities for development. There were actually some 128 residents who specifically objecting to any housing development on the Hook Lane site.

Theme 10: Meeting the challenge of climate change, flooding and coastal change

Additional comments

Paragraph 3.3.3 highlights that the tidal defences provide protection to the 1 in 80 year standard. We would question this fact and request confirmation where this information came from.

Paragraph 3.3.4 incorrectly highlights that the Shoreline Management Plan for Beachy Head to Selsey Bill (2006) is to 'Hold the Line' for the sea defences.

We would highlight that the long term policy for Pagham Harbour to Church Norton is Managed Realignment of the Shoreline. Additionally, Pagham to East Head Coastal Defence Strategy 2014 has the recommended option for Pagham to be Adaptive Management.

Paragraph 3.4.4 discusses the fact that Sefton Road regular suffers from flooding then for some reason highlights that drainage repairs were undertaken in Hook Lane to mitigate flood risk to property.

We are of the opinion that these two flooding issues are unrelated and should not be linked. Furthermore, any flood mitigation works that have undertaken should be further explained so their effectiveness can be assessed.

Additionally, it mentions historical flooding in the area but does not look into the reasons for this flooding nor improvement works required to mitigate the risk.

The Parish Council would highlight that it is their understanding that the Environment Agency maps only show the fluvial flood outlines associated with main river which in this case is the Pagham Rife located several hundred meters away. The EA maps do not show the fluvial flood outlines associated with the local watercourses on or adjacent to the site.

We are aware that there are numerous culverted sections on these watercourses which are believed to be below the minimum recommended size of 450mm. These will cause restrictions to flow and are likely to become blocked increasing the flood risk. The applicant needs to undertake a full assessment/survey of these ditches and culverts and undertake a hydrological assessment to ensure they have the capacity to take existing and anticipated flows.

Without this information the flood risk assessment cannot make sweeping statements about the fluvial flood risk to the site and surrounding area.

Paragraph 3.6.3 refers to Strategic Flood Risk Assessments and in particular to Policy WDM 3 – Sustainable Drainage Systems which refers to infiltration options. Yet in paragraph 2.7.7 there is a clear statement that infiltration systems are not feasible.

Paragraph 3.8.7 incorrectly states that Pagham Rife is the only Rife that lies within the Arun District Boundary. We are aware of several other Rifles eg. Lidsey Rife, Aldingbourne Rife, Elbridge Rife etc, all located in the Arun area.

Paragraph 3.8.16 refers to the existing green field run off rate of 11.24 lit/sec/ha for the total site area of 17.5 ha. It is considered that this calculation is incorrect as the greenfield run off rate used in calculating the allowable discharge rate from the development should only look at the developed impermeable area and not the whole site as the rest of the unsurfaced site will continue to discharge as before. Additionally, the proposed surface discharge rate is too high and should be closer to 4 lit/sec/developed ha which is Qbar as shown in paragraph 5.1.14

Paragraph 3.8.21 is misleading as The Shoreline Management Plan (2006) identifies that between Pagham Harbour to Church Norton the Long Term Policy is managed re-alignment of the Shoreline. We note from consultations from the Environment Agency that the FFL of the buildings must be no lower than 5.1mAOD due to the flood risk.

Paragraph 3.8.25 refers to groundwater levels were recorded over a year yet in paragraph 3.8.26 only mentions visits between January and July 2016. This requires clarification as it is important that groundwater levels are recorded over a wet winter to enable an accurate assessment.

Paragraph 3.8.29 demonstrates a lack of knowledge in relation to groundwater level fluctuations in the area. It has been demonstrated by historical events that due to the nature of the area, groundwater levels can rise rapidly as a result of rainfall falling on the South Downs and, acting like a sponge, releases the water continuously and rapidly into the lower coastal floodplain. Additionally, the influence of the tides can restrict the release rates allowing groundwater levels to be very high over long periods of time during wet events.

Paragraph 3.8.30 refers to the drainage system utilising shallow drainage features above groundwater levels yet it does not appear a comprehensive monitoring programme has been completed to fully understand the potential levels.

Paragraphs 3.8.37/38 refer to the flooding that currently occurs in Hook Lane and indicates that the proposed development will not exacerbate this. It does not make any attempt to identify why this flooding occurs nor does it mention the flooding that currently exists downstream in Sefter Road. This needs to be fully investigated and improvements made before and additional development should be considered.

Paragraph 5.2.3 identifies that foul water disposal to Pagham Sewage Treatment Works will not be a problem. However, we are aware that Southern Water will be required to undertake major improvement works to cater for this site and potentially several other large scale developments. Southern Water have admitted that they have had to release sewage directly into the Pagham Rife on at least 55 times since 2011 as their existing works could not cope with the flows. Southern Water must clearly outline

what improvement works would be necessary to deal with additional flows in addition to works that will be required to deal with existing problems.

This information must be provided at the outset as if outline permission was granted and the Sewage Treatment Works could not be upgraded there would be pressure to provide a private treatment works on site which would be not be acceptable.

Natural England Agricultural Land Classification – Appendix 6

