

Sandra Edwards

From: Amanda Scholes on behalf of Planning.Responses
Sent: 15 June 2017 08:50
To: Planning Scanning
Subject: FW: Application for a call in of major applications in Pagham, West Sussex
Attachments: Application for call in 12.06.17.pdf

These are the Pagham Major Applications

P/134/16/OUT

P/140/16/OUT

P/6/17/OUT

P/25/17/OUT

Kind Regards

Mandy

From: David Innes
Sent: 14 June 2017 16:18
To: Planning.Responses
Subject: FW: Application for a call in of major applications in Pagham, West Sussex

Please upload as additional correspondence from Pagham PC on each of the Pagham major applications.

thanks

David Innes | Planning Consultant , Strategic Development, [Arun District Council](#) | Location: First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF DX 57406 Littlehampton

Visit Arun's web site at www.arun.gov.uk



Save the environment - think before you print.

From: Pagham Parish Council [REDACTED]
Sent: 12 June 2017 11:03
To: [REDACTED]
Subject: Application for a call in of major applications in Pagham, West Sussex

Dear Sirs

Please find attached a letter requesting consideration for a call-in for 4 major planning applications proposed for Pagham, West Sussex.

A hard copy of this correspondence is in the post to you today.

Kind regards

[REDACTED]

Nicola Jones
Clerk & RFO
Pagham Parish Council
[REDACTED]

PAGHAM PARISH COUNCIL

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

CLERK

Nicola Jones

CHAIRMAN

Cllr R Radmall

All correspondence to be addressed to the Clerk

National Planning Casework Unit
5 St Philips Place
Colmore Row
BIRMINGHAM
B3 2PW

12th June 2017

Dear Sir or Madam

Request to the Secretary of State for "call in" of major applications for residential-led development at Pagham, West Sussex, under section 77 of the Town and Country Planning Act 1990

I have been instructed by Pagham Parish Council, at its meetings on March 28 and April 11 2017, to seek the Ministerial "call in" of four planning applications for major residential-led development in the parish. In total, the applications involve proposals for over 1,000 new dwellings and a range of other non-residential development. This is an unprecedented scale of proposed new development for the parish from applications submitted over the last six months.

All four applications currently await determination by the local planning authority, Arun District Council (ADC), and are departures from the existing development plan (Arun Local Plan 2003 and saved policies 2007)

The applications the Parish Council wishes to have called in for Ministerial determination following a public inquiry are set out in the table below:

Site annotation on attached map	ADC Appln Ref. No.	Description of proposed development	Site address	Date Submitted to local planning authority	Possible date for consideration by LPA committee
A	P/134/16/OUT	Outline application with some matters reserved for development of up to 250 dwellings (including affordable homes), provision of land for a replacement scout hut, land for an Ambulance Community Response Post facility & land for 1FE primary school. Primary vehicular access from Sefter Rd & demolition of 80 Rose Green Road & creation of pedestrian & emergency only	Land north of Sefter Road and 80 Rose Green Road, Pagham	13.12.16	21 June or 19 July 2017 (to be confirmed)

		access. Provision of public open space incl childrens play areas, landscaping, drainage & earthworks			
B	P/140/16/OUT	Outline application for mixed use development comprising of up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route & other community uses including public open space & allotments with some matters reserved.	Land south of Summer Lane and west of Pagham Road , Pagham (part of application site falls within the neighbouring parish of Aldwick)	21.12.16	21 June or 19 July 2017 (to be confirmed)
C	P/6/17/OUT	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	Land north of Hook Lane, Pagham	18.01.17	Not known
D	P/25/17/OUT	Outline application for erection of 89 dwellings, access roads, landscaping,	Church Barton House, Horns Lane,	10.03.17	Not known

		open space and associated works	Pagham PO21 4NZ		
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The attached map shows the above four application sites in Pagham

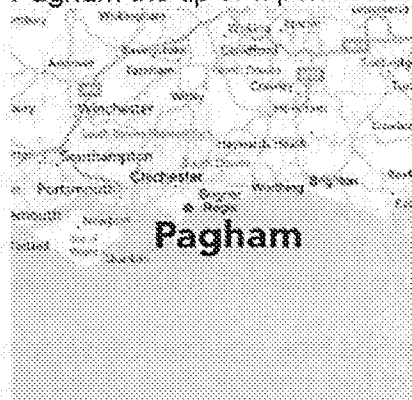
The Parish Council has carefully considered the following documents in making this request for "call in":

- The National Planning Policy Framework (2012)
- The National Planning Practice Guidance (2014 and as updated) : particularly "Determining a planning application" (paragraph 014)
- Ministerial policy on call in applications made to Parliament on October 26 2012
- Arun District Local Plan 2003 and saved policies 2007
- Emerging Arun Local Plan : Modifications published for consultation April 2017-May 2017
- Pagham Neighbourhood Plan : submission draft April 2014

The Parish Council considers that a Ministerial "call in", and examination of all four applications together in a public inquiry, prior to decision is justified for the reasons set out below.

1. The development proposed is so substantial, both individually and cumulatively, that to grant planning permission would undermine the plan-making process by pre-determining decisions about the scale, location and phasing of new development that are central to the emerging Local Plan and emerging Neighbourhood Plan

Pagham parish has a population of around 6,000 and a dwelling stock of nearly 3,100. It lies on the westernmost side of the Bognor Regis urban area which extends some 11km eastwards along the coast to Middleton-on-Sea. The tidal inlet of Pagham Harbour –an internationally important site for its outstanding bird and marine life and their habitats (protected by Special Protection Area ,Ramsar and other designations) - in effect makes Pagham the tip of a peninsula.



The roads serving Pagham are low capacity minor roads. This means traffic generated in the parish must traverse either urban areas in Bognor or a rural area north towards Chichester, to reach the main routes along the coast, the A259 and the A27. Both of these main routes suffer from congestion for much of the day, although there are plans to complete a relief road around the north side of Bognor. There are relatively few local jobs, so housing development tends to increase long distance commuting in an area with relatively poor public transport (the nearest railway station is at Bognor more than 5km away) .

Much of the rural area consists of high grade farmland (MAFF 1 and 2), producing high value horticultural crops. The parish contains extensive areas at risk from sea, tidal or surface water flooding.

All these factors have in the past led to very modest rates of development as shown in the table below

TABLE 1: HOUSE BUILDING RATES IN PAGHAM PARISH

Period	Housing completions	Average annual build rate
1991-1996	105	21
1996-2001	229	46
2001-2006	141	28
2006-2011	40	8
2011-2016	26	5
1991-2016 (25yrs)	541	21.6

Source: West Sussex CC: housing completions data and Arun DC authority monitoring report for 2015-16

This modest level of development was continued into early drafts of the new Arun Local Plan (2011-2031), where the 2015 submission document proposed around 100 new dwellings. This was then reflected in the Pagham Neighbourhood Plan 2014 which proposed two housing land allocations at Summer Lane (59 dwellings) and at the rear of the Inglenook Hotel (45 dwellings), alongside a continuing yield from infill and conversions within the existing built up area.

The local planning situation changed markedly in January 2015 with the submission of a new Arun Local Plan to the Secretary of State, which looked forward to 2031. The Local Plan Examination in Public began in November 2015, but was formally suspended by the Planning Inspector in February 2016 following a Procedural Meeting and initial Hearing sessions. The suspension was granted to enable the Council to undertake further work and produce proposed modifications to the Local Plan in response to a range of observations and concerns identified by the Planning Inspector. In particular, the inspector expressed concern over the calculation of "Objectively Assessed Housing Needs" (OAHN), the planning strategy to deliver growth, and the strategic sites to give effect to it.

ADC has now completed the additional work requested by the Local Plan Inspector. In April 2017, it published Proposed Modifications to the Local Plan to reflect the latest national planning policy requirements, the latest household projection data, further technical analysis, and joint work with neighbouring planning authorities as part of the "duty to co-operate".

The net result of all this recent work is a very significant increase in the proposed level of housing development, with the implied annual build rate in Arun District to 2031 up from 580p.a. in the 2015 document to 1,000 p.a. now. Clearly, this requires a new planning strategy with more strategic sites and more infrastructure investment. It also involves more friction with local environmental assets.

The latest draft Local Plan in April 2017 includes for the first time significant development proposals for Pagham. These comprise the allocation of two strategic sites called Pagham North(800) and Pagham South(400), which will together provide over 1200 new dwellings up to 2031, together with new social and economic infrastructure to support growth. (Policy H SP 2a)

The planning applications for which we seek Ministerial intervention effectively "jump the gun" by being submitted in advance of the Local Plan Modifications and any public discussion and comment upon them. The current local plan consultation is the first time Pagham residents and businesses have had a chance to comment on proposals for large scale strategic development in the parish.

They also risk pre-empting the Local Plan examination where an independent inspector will consider OAHN in Arun District, the extent to which they can be met in a sustainable way (given the outcome of "duty to co-operate discussions with neighbouring authorities), the appropriate planning strategy to meet the agreed level of growth, and the strategic sites and infrastructure delivery policies to give effect to it.

2. The emerging plans are at an advanced stage, but do not yet form part of the development plan for the area

Both the emerging Local Plan and the Neighbourhood Plan are at an advanced stage. The Local Plan is at examination stage, albeit a stage suspended for additional technical work (now completed) and consultation on modifications (now under way). A report to ADC's Local Plan Sub-Committee in March 2017 anticipates that the Examination will be resumed in summer 2017, with an Inspector's report following in autumn 2017 and formal adoption in winter 2017-18

Progression of the submitted Pagham Neighbourhood Plan has stalled for two years by the uncertain position over the scale, location and phasing of development in the Local Plan. However, it has been formally submitted and the parish council is ready to resume discussions with ADC on progressing it as soon as the strategic planning position is clarified.

The planning applications which are subject of this call-in request do not accord with the submitted Pagham Neighbourhood Plan. Since 10 July 2014 (and subsequently extended at regular intervals), the Secretary of State has said that the recovery criteria for planning appeals should include:

"proposals for residential development of more than 10 units (later increased to 25) where the qualifying body has submitted neighbourhood plan has been submitted to the local planning authority..."

Whilst the current position in Pagham involves "live" applications rather than planning appeals , the principle of Ministers considering intervention in situations where individual planning applications cut across submitted neighbourhood plans surely applies here , where the proposals exceed the scale of development in the neighbourhood plan by a factor of ten.

3. The proposals may conflict with national policies on important matters and have significant effects beyond their immediate locality

The land to the west of the built up area of Pagham is in close proximity to the internationally important habitat of Pagham Harbour, with its many protective designations. Major development in its drainage catchment has drainage and waste water implications for the protective designations .There are also potential conflicts with national policies to steer development away from areas at risk from flooding and to protect the best and most versatile farmland, wherever possible.

The location of these sites on the far western side of the Bognor urban area raises transport issues in terms of the ability of the local road network to handle significant additional traffic, particularly at peak hours. In turn, this affects the strategic A259 and A27 routes over a wide area, including the A27 around Chichester which Highways England has identified as being in need of improvement. Large scale development around Pagham will particularly affect traffic at the congested A27 junctions at Oving (A259) and Whyke(B2145) on the edge of Chichester .

All of these are important matters which would be normally considered at a Local Plan Examination, where a sustainability appraisal would inform debate and choices over the scale , location and phasing of development. A set of individual planning applications does not afford the same level of scrutiny and co-ordination, unless they are drawn together in a public inquiry.

The four planning applications cumulatively have significant effects beyond their immediate locality. Part of the significant increase in Arun's OAHN arises from "duty to co-operate" discussions in that Arun is considered better placed to accommodate development than two of its immediate neighbours, Chichester and Worthing. In turn, this means more strategic

sites have to be found in Arun. This strategic choices across coastal West Sussex has yet to be tested in any public arena and the parish council submits that it cannot be done satisfactorily through decisions on individual planning applications. The planning applications have raised concerns over a much wider area beyond Pagham parish. I attach copies of letters /e-mails from nearby town and parish councils who share our concerns and support our request for "call in " of the applications and a public inquiry.

- 4. The Parish Council is concerned that a low current housing land supply in Arun District will prompt the early grant of planning permissions , despite concerns that this will be premature and prejudicial to the plan-making process , and also preclude proper public debate and participation in decisions which will profoundly affect life in the parish**

With an escalating OAHN, and continuing suspension of its Local Plan Examination, Arun District Council has understandably struggled to meet the five year housing land supply requirements set out in national policy. The most recent calculation by ADC (at April 2016) indicates a supply of 2.12 years. More recent information is not available, but it seems likely that there will continue to be significant shortfalls pending further progress towards local plan adoption and release of allocated sites.

However, ADC has considered short-term measures to supplement the housing land supply. A report to the Local Plan Sub-Committee on 6 December 2016 discussed the available options. The recommended options included:

- inviting early planning applications on smaller sites (<300 units) which were identified as being "sustainable" and deliverable" in ADC's Housing and Employment Land availability assessment
- inviting early planning applications for the first phase of development on strategic sites , provided that this did not compromise implementation of later phases

In these circumstances, the Parish Council is concerned that the ADC's drive to increase short term housing land supply will override existing planning policies and other material planning considerations. This runs the risk of being premature and prejudicial to the plan-making process, and also precluding proper public debate and participation in decisions which will profoundly affect life in the parish.

We have had no clear indication from ADC so far on the procedure for consideration of the four applications. However, we have reason to believe that they may wish to consider the two applications submitted in December 2016 first (A and B on the schedule above), possibly as early as the scheduled committee meeting on June 21

- 5. The application proposals include some overlapping social and economic provision in terms of primary schools, care homes, and community hub facilities which mean that they are best considered together in a co-ordinated way.**

Three of the four planning applications include a primary school, and two include a care home. ADC's draft planning policy H SP 2a includes a requirement for one school and one care home. It is by no means clear how consideration of the four applications individually and separately will result in the provision sought by the draft Local Plan. If all four sites were eventually granted planning permission, then only one primary school is necessary and only one would be built. In all probability, the extensive land allocated to them (including playing fields) on the other two application sites would then be the subject of planning applications for further residential development.

Again, the comprehensive and simultaneous consideration offered by local plan examination or, failing that, Ministerial "call in" and a public inquiry, is a better way to achieve the sustainable and co-ordinated development of Pagham.

Conclusions

The Parish Council believes that the points above amount to a compelling case for Ministerial "call in", if ADC are minded to grant planning permissions for major residential-led

developments in Pagham , prior to the resumption of the Local Plan Examination and receipt of the Inspector's Report on it .

The latter is the proper arena for consideration of whether it is appropriate to substantially increase the level of house building in Arun District; whether Pagham has a role to play in hosting strategic development sites; and whether these can be provided in a way which represents sustainable development, protecting local environmental assets as far as possible, and backed by timely investment in supporting infrastructure.

If minded to permit any of the applications , ADC will - in any event-be obliged to refer them onto the Secretary of State as "departures from the development plan" under the Town & Country Planning (Consultation) (England) Regulations 2009.

If this is the case , the Secretary of State is strongly urged to use his discretion to intervene and "call in " the applications for public inquiry , in order to secure the proper planning of both Pagham and the wider area of West Sussex.

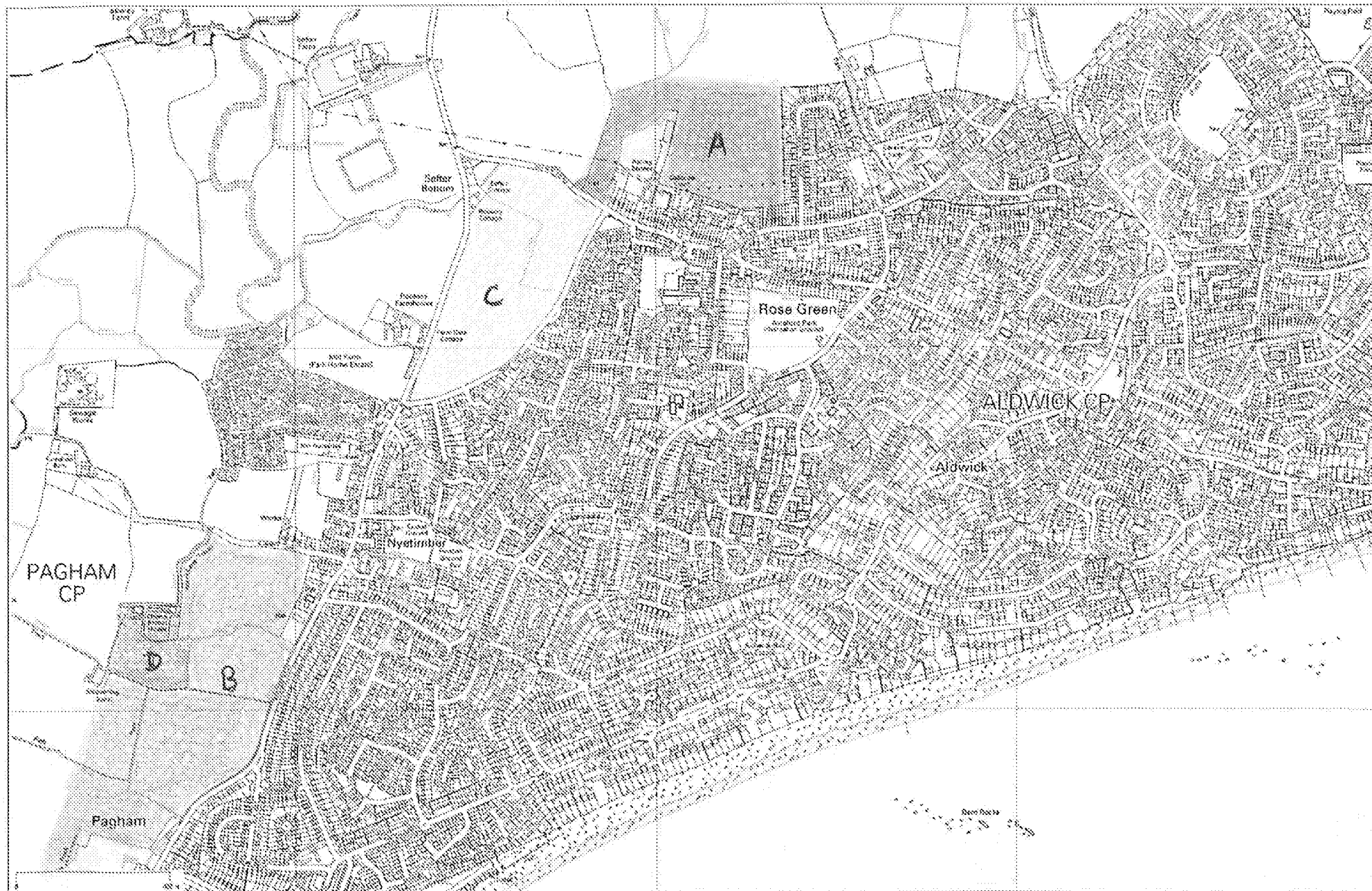
I would be grateful if you would formally acknowledge receipt of this request for "call in".

Please do not hesitate to get in touch if you need any further background information to assist you in coming to a decision

Yours faithfully



Nicola Jones
Clerk & RFO
Pagham Parish Council





**Bersted
Parish Council**

**Clerk to the Council
Bersted Jubilee Hall, Chalcraft Lane,
North Bersted, Bognor Regis,
West Sussex PO21 5TU**



The Rt Hon
Sajid Javid MP
Secretary of State for
Communities and Local Government
2 Marsham Street
London
SW1P 4DF

7th June 2017

Dear Secretary of State,

SUPPORT FOR PAGHAM PARISH COUNCIL RE PLANNING APPLICATIONS

Pagham Parish Council wrote to you on 4th May requesting that you call-in Arun District Council planning applications P/134/16/OUT, P/140/16/OUT & P/6/17/OUT which refer to 3 large scale housing developments within their parish. The aim of this letter is to reinforce that request from Bersted Parish Council's perspective.

With Bersted to the north, the sea to the south and Pagham Harbour Local Nature Reserve¹ to the west, almost all vehicular traffic travelling in & out of Pagham must pass through Bersted. Accordingly, we have recently conducted traffic surveys that reveal a daily flow rate of almost one thousand motor vehicles per hour during peak periods. Pagham's own figures – taken on narrow country roads that have changed very little in the last hundred years – support these findings.

With the daily westbound commuter traffic already reduced to a crawl with the concomitant resultant air pollution, plus the recent ministerial decision to abandon an upgrade to the A27 around Chichester, it is clear that our respective localities are approaching saturation point in terms of vehicular access and that the cumulative effect of the subject planning applications would have much wider and damaging implications.

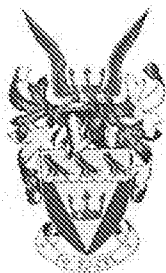
We trust that these matters will be taken into consideration when determining Pagham's request.

Yours faithfully,



**Chr Brian Knight
Chairman
Bersted Parish Council**

¹ Also designated as a Site of Special Scientific Interest, a Special Protection Area, a Geological Conservation Review area and a Ramsar Convention site.



BOGNOR REGIS TOWN COUNCIL

TOWN CLERK Glenna Frost, The Town Hall, Clarence Road,
Bognor Regis, West Sussex PO21 1LD



Nicola Jones
The Clerk
Pagham Parish Council
The Village Hall
Pagham Road
Pagham
Bognor Regis
PO21 4NJ

7th June 2017

Dear Nicola,

Call in application to Secretary of State in respect of 3 large-scale housing developments in Pagham - P/134/16/OUT, P/140/16/OUT and P/6/17/OUT

I am writing to you on behalf of Bognor Regis Town Council's Planning and Licensing Committee, following your Chairman's request for support in demonstrating that the impact the possible approval of the 3 large-scale housing applications listed above, goes beyond your immediate locality.

The Town Council sympathises with the predicament that the village of Pagham finds itself in. It is inevitable that Pagham will have to take on some development due to the housing need in the District but the scale proposed, if all 3 applications are granted approval, is bewildering for a village of its size. Bognor Regis is the nearest town to Pagham village, just over 3 miles away, and there will obviously be some impact on the town and its 24,000 residents, therefore the Town Council wishes to support Pagham Parish Council with its 'Call in' application to the Secretary of State.

Firstly the road networks surrounding Pagham and Bognor Regis cannot cope with the weight of traffic they currently deal with particularly at peak times, let alone with the addition of another 1,000-2,000 vehicles from the proposed new developments. The recent cancellation of the A27 improvements by the Secretary of State for Transport should be given consideration as the congestion impacts residents south of the A27 including Pagham and Bognor Regis. Although Bognor Regis has benefitted from the new relief roads, there are still issues with congestion at peak times on the A259 to Chichester. Public transport in the area is poor and at times unreliable, both rail and bus.

TOWN MAYOR: Councillor Phil Woodall

DEPUTY MAYOR: Councillor Adam Cunard

The town of Bognor Regis has some of the poorest and most deprived wards in the country within its boundary (wards listed within the 20% most deprived nationally). The town's services are stretched with only a minor injury hospital, the nearest major hospitals are situated several miles away in Worthing and Chichester. The town lacks the amenities to support the communities of the wider areas of Bersted, Aldwick, Rose-Green, Felpham and Pagham.

In addition, West Sussex also has the lowest funding support from central government for education in the country and any increase in pupil numbers from the proposed new developments will only add to the financial restraints on the local schools. For education, skills and training, wards within Bognor Regis are listed in the 10% most deprived nationally.

Yours sincerely,



Ruth Hambleton
Committee Clerk



Wednesday 31st May 2017

To Whom It May Concern

Selsey Town Council, having reviewed the planning applications from Arun District Council would like to make the following observations.

Whilst we appreciate that houses have to be built somewhere we contend that the access and egress of the current group of outline applications amounting to around 1,200 homes will have a significant effect on the residents of Selsey and the Manhood peninsula in general. Assuming the national average of circa 2.5 cars per household, these cars will have to exit Pagham somewhere. Without significant investment in the road infrastructure the only realistic way out is via an unlisted road and then on to the B2166.

The B2166 is a narrow windy country road that currently takes large vehicles for the local farming industry and a local bus route, however it is not large enough for the huge increase in traffic volumes that will result from the proposed new developments. At one of the narrowest sections of the road is a double bend that is outside of a Primary School. This pinch point will be an even more hazardous section of the road with the increased volume of traffic that will coincide with the children arriving at school and having to cross the very busy road, even though it is controlled by a Pedestrian crossing. The space at either side of the road at the pinch point is narrow and does not allow for more than a very few pupils and parents to gather safely.

As the road continues along an equally narrow section towards the B2145, the roundabout that joins the two roads together as the only access to the A27 will prioritise the traffic from Pagham to the detriment of all traffic from the south travelling along the B2145. The traffic survey commissioned by Selsey Town Council highlights this stretch as congested and in danger of over capacity at peak times already. With the addition of the new traffic load that will inevitably be generated from Pagham the situation will be intolerable.

Access to the A27 via South Bersted on to the already very busy A259 is unrealistic as it will join the congestion that is a daily occurrence at the Bognor Bridge roundabout with traffic trying to join and cross the A27. Selsey Town Council contends that unless there is significant investment in the road structure that offers the new residents a realistic access and egress from Pagham that does not impede the residents of the Manhood peninsula who are already experiencing large traffic volumes and difficult access to the A27, the applications on the table should be rejected.

Yours faithfully,

RP
Mike Beal
Chairman of Council

RP
Clive Alden
Chairman of Planning



NORTH MUNDHAM PARISH COUNCIL
Working for the whole community

Mrs Louise Chater
Clerk

1 Charlmead, East Wittering, Chichester West Sussex PO20 8DN

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

11th May 2017

Sent by email.

Dear Nicola,

Call-in Application to the Secretary of State

Reference: Planning applications P/134/16/OUT, P/140/16/OUT, P/6/17/OUT

I write in response to your Chairman's letter of 4 May 2017, seeking support for an application to the Secretary of State to 'call in' the applications referenced above.

We note that one of the key criteria is that any impact of these applications being approved will have an impact beyond 'their immediate locality'. It is precisely because we see an impact on our parish that North Mundham Parish Council has already written a letter of objection to each of the applications cited. In particular, our principal concern is that these applications, taken individually would each have a severe detrimental impact on the quality of life for the residents of our parish, in terms of increased traffic flow, its effect on pedestrian safety and an increase in environmental pollution. We also have concerns about the impact on the natural environment. Our individual letters expose our concerns in more detail, and copies are attached for your information.

Although we have written to object to each of these planning applications individually, clearly their combined impact will be far more severe, and we note that the scope of our concerns echoes yours. We are therefore very ready to support your application to the Secretary of State, and we will be entirely content for you to use this letter and our individual letters of objection in support.

Yours sincerely,

Louise Chater MILCM
Clerk
North Mundham Parish Council

Enc

Copies of North Mundham Parish Council's letters of objection to applications
P/134/16/OUT, P/140/16/OUT, P/6/17/OUT



NORTH MUNDHAM PARISH COUNCIL

Working for the whole community

Mrs Louise Chafer

Clerk

1 Charlmead, East Wittering, Chichester West Sussex PO20 8DN

Mr D Innes,
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

10 February 2017

Dear David,

P/6/17/OUT - LAND NORTH OF HOOK LANE PAGHAM

1. Arun Transport Study 2016 Stage 3
2. Transport Assessment Hook Lane
3. Land North of Sefton Road Transport Assessment
4. Pagham South Transport Assessment TA/01
5. Addendum Transport Assessment ATA/02

North Mundham Parish Council notes from the recently published Transport Study (Reference 1) that it already embraces the principle of development on these sites. We are concerned that the potential impact on adjacent communities of these three proposed developments has not been properly assessed and appreciated, and on that basis, we wish to record our objection.

Our main concerns lie with the potential for increased traffic through the parish mainly, but not exclusively, on the B2166 and Vinnetrov Road - the volume of traffic on Marsh Lane is already an additional issue for local residents. However, we also have concerns about drainage, the provision of cycle routes and the effect on the environment.

We have considerable difficulty in presenting a detailed response because we have neither the expertise in-house nor the financial resources to engage specialists to conduct a detailed analysis of the data presented to us. We therefore have problems when presented with data such as paragraphs 4.5 to 4.7 of Reference 5 which quote percentage distributions which total more than 100%.

Our principal concern is that all the data with which we have been presented focuses on traffic flows along the main routes, with no consideration of the effect on side roads at junctions and on the safety of pedestrians. The parish of North Mundham has a primary school adjacent to the B2166 and a nursery school close by. Although there is a single light-controlled pedestrian crossing close to the school, this is of no help to pedestrians attempting to cross the B2166 at other junctions.

We are therefore concerned that none of the applications address the effects of these proposed developments on:

- Local traffic in our parish
- Pedestrian safety
- Traffic pollution – both atmospheric and noise

For example, the Addendum Transport Assessment (Reference 5) considers the junction of the B2166 with Vinnetrow Road and Mill Lane (the 'Walnut Tree' Junction), but does not consider the impact on any of the other junctions in North Mundham, such as the B2166 junction with Marsh Lane and Brookside, and the B2166 junction with Church Road and School Lane.

We are also concerned that the transport assessments only consider the effects on vehicular traffic, and take no account of the safety of pedestrians trying to cross the road at or near these junctions. For example, the implications for pedestrian safety at the Walnut Tree junction have long been a cause of local concern. In response to these concerns WSCC Highways commissioned a report looking at ways in which pedestrian safety at the junction might be improved, but from which no pedestrian safety measures have yet resulted.

The Sefter Road Traffic Assessment (Reference 3) identified the Walnut Tree junction as a particular concern (paragraph 12.5) and proposed improvements (paragraph 13.5). This proposed improvement is a very short length of additional lane in the approach from the western arm of the B2166. We are not convinced this would do anything to ameliorate the traffic situation and it will do nothing for pedestrian safety. The previous work on pedestrian safety at this junction has indicated that the two lanes on the B2166 where it joins the junction from the east present a particular difficulty for pedestrians trying to cross that arm of the roundabout. We therefore have serious reservations about any proposal to add an additional approach lane on the western arm.

We are particularly concerned that there appears to be no cohesion between the various traffic assessments. For example, considering just the Walnut Tree roundabout:

- The Hook Lane study asserts this junction is close to capacity in the AM peak (Reference 2, paragraph 7.31)
- The Sefter Road study indicates it is operating over capacity in the PM peak (Reference 3, table 12.15)
- The Pagham South study tells us it is approaching capacity in the PM peak with or without development traffic (Reference 4, paragraph 9.12.v)

But the Addendum Transport Assessment proposes no action to mitigate any potential problems, despite the fact that it predicts this junction will reach 91% capacity in the PM peak (Reference 5, paragraph 9.6.vi).

Indeed, it appears that the difficulties of local drivers and pedestrians in this parish have received scant consideration. For example, the statement in Reference 5, paragraph 9.8 that 'drivers on the side roads will have a choice of routes to take and will no longer appear on a specific side arm if that arm appears to be more congested than an alternative route' makes an unwarranted assumption that there will always be an acceptable alternative route and represents an arrogant dismissal of local concerns.

Despite the predictions of increased traffic flow, none of the assessments recognise the potential for increased pollution of the atmosphere and noise pollution, or offer any measures in mitigation. This must be a serious concern particularly because the playground of North Mundham School is immediately adjacent to the B2166 and at a slightly lower level, and will be affected by both traffic fumes and noise. Other residents of the parish may escape the worst of the exhaust fumes but will find it impossible to avoid the increased noise. We expect to see both aspects of pollution addressed in any assessment of the impact of increased traffic.

We see some significant anomalies between the various individual traffic assessments, which have not been explained in the Addendum Transport Assessment (Reference 5), and which we have already alluded to above. But more seriously, we are far from convinced that Reference 5 has taken proper cognisance of the other potential changes to the boundary conditions of the study area. It appears to treat the three proposed developments as the only changes to be considered. For example, there is no consideration of additional traffic on the B2145 which might result from future developments in Selsey, additional traffic from rat-running on Marsh Lane which might result from the many anticipated residential developments in the Arun District, and traffic on Vinnetrow Road from future developments on the Fuel Depot site adjacent to the Bognor roundabout on the A27.

More significantly, we see no sign whatsoever of any consideration of the potential impact of the various options being considered for upgrades to the A27, and the impact they may have on local traffic. We note that the Arun Transport Study (Reference 1) makes some significant assumptions on the future form of the junctions on the A27 which can no longer be guaranteed - for instance the layout of the A27/B2145 Whyke roundabout (page 29/44) and the A27/A259 Bognor Road roundabout where it is assumed that Vinnetrow road becomes one-way (page 30/44). Although these changes feature in the transport mitigation measures assumed in Chichester District's Local Plan, they would in many cases be entirely subsumed by changes proposed in the various options recently proposed for the A27.

It is clear that there is still much to do to produce a proper coherent statement of the potential effects of these developments on the local transport infrastructure.

Traffic is not our only cause for concern. We note that all the proposed developments are sited close to the Pagham Rife. The Pagham Rife is a key component in the local drainage system, and is only able to drain into Pagham harbour at times limited by the state of the tide. At other times water accumulates behind the sluice and backs up. The applicants all make reference to the need for sustainable drainage systems. We must emphasise the importance of systems that limit the rate of run-off into the Pagham Rife, so that it presents no worse a situation than the existing drainage from agricultural land.

We note that applicants have made some assumptions about cycle use, but there is no structured proposal for any new cycle routes. The Addendum Transport Assessment (Reference 4, paragraph 2.10) has noted that the B2145 and B2166 are narrow in places, and this limits their suitability as a safe cycle route. The proposed alternative makes use of the national cycle route LNR88 from Pagham Harbour to Chichester via North Mundham (Reference 4, paragraph 2.10). Unfortunately, the assessment fails to provide a valid explanation of how this route can be achieved. Reference 4 paragraph 5.14 suggests that the link is via South Mundham, but the route indicated is over footpaths - note that the route from the area of North Honer Farm northwards to South

Mundham shown in Reference 4 figure 5.3 is a private road which is only dedicated as a public footpath and not as a cycleway.

It has long been acknowledged that considerable lengths of the B2166 and the B2145 are unsuitable and unsafe for cyclists. Although we are aware of aspirations for a safer cross-country route connecting North Mundham and Bognor, at the moment the scope for relieving traffic by encouraging cycling is very limited.

We recognise the importance of tourism for the local economy. Part of Pagham Harbour lies within the boundaries of our parish. The increase in the number of buildings and in human activity must have a potential to affect this very significant environment for bird life, particularly where agricultural land close to the harbour is developed for residential use. It is important to maintain a realistic limit on new development. Suggestions that its effects might be mitigated by financial contributions from developers make no sense when it threatens a priceless asset.

In summary, North Mundham Parish Council has serious reservations about the potential effects of these developments, specifically:

- The potential for increased local traffic flow, and the absence of any detailed analysis which comprehends the impact of developments on the A27
- The effect of increased traffic flow on pedestrian safety, particularly at junctions
- Traffic pollution from both exhaust fumes and noise, particularly as it affects North Mundham school
- Drainage of surface water and the potential impact on Pagham Rife
- The absence of any realistic cycle routes to ameliorate predicted traffic densities
- The threat to the environment of Pagham Harbour.

It is clear that there is still much to do to produce a proper coherent statement of the local transport infrastructure. Until we are presented with a proposal that takes proper account of the effects on traffic and pedestrian safety in the neighbouring communities we will have no option but to sustain our objection.

Yours sincerely,

Louise Chater MILCM
Clerk North Mundham Parish Council



NORTH MUNDHAM PARISH COUNCIL

Working for the whole community

Mrs Louise Chafer

Clerk

1 Charlmead, East Wittering, Chichester, West Sussex PO20 8DN

Mr D Innes,
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

10 February 2017

Dear David,

P/140/16/OUT - LAND SOUTH OF SUMMER LANE & WEST OF PAGHAM ROAD PAGHAM

REFERENCES:

1. Arun Transport Study 2016 Stage 3
2. Transport Assessment Hook Lane
3. Land North of Sefter Road Transport Assessment
4. Pagham South Transport Assessment TA/01
5. Addendum Transport Assessment ATA/02

North Mundham Parish Council notes from the recently published Transport Study (Reference 1) that it already embraces the principle of development on these sites. We are concerned that the potential impact on adjacent communities of these three proposed developments has not been properly assessed and appreciated, and on that basis, we wish to record our objection.

Our main concerns lie with the potential for increased traffic through the parish mainly, but not exclusively, on the B2166 and Vinnetrov Road - the volume of traffic on Marsh Lane is already an additional issue for local residents. However, we also have concerns about drainage, the provision of cycle routes and the effect on the environment.

We have considerable difficulty in presenting a detailed response because we have neither the expertise in-house nor the financial resources to engage specialists to conduct a detailed analysis of the data presented to us. We therefore have problems when presented with data such as paragraphs 4.5 to 4.7 of Reference 5 which quote percentage distributions which total more than 100%.

Our principal concern is that all the data with which we have been presented focuses on traffic flows along the main routes, with no consideration of the effect on side roads at junctions and on the safety of pedestrians. The parish of North Mundham has a primary school adjacent to the B2166 and a nursery school close by. Although there is a single light-controlled pedestrian crossing close to the school, this is of no help to pedestrians attempting to cross the B2166 at other junctions.

We are therefore concerned that none of the applications address the effects of these proposed developments on:

- Local traffic in our parish
- Pedestrian safety
- Traffic pollution – both atmospheric and noise

For example, the Addendum Transport Assessment (Reference 5) considers the junction of the B2166 with Vinnetrow Road and Mill Lane (the 'Walnut Tree' Junction), but does not consider the impact on any of the other junctions in North Mundham, such as the B2166 junction with Marsh Lane and Brookside, and the B2166 junction with Church Road and School Lane.

We are also concerned that the transport assessments only consider the effects on vehicular traffic, and take no account of the safety of pedestrians trying to cross the road at or near these junctions. For example, the implications for pedestrian safety at the Walnut Tree junction have long been a cause of local concern. In response to these concerns WSCC Highways commissioned a report looking at ways in which pedestrian safety at the junction might be improved, but from which no pedestrian safety measures have yet resulted.

The Sefter Road Traffic Assessment (Reference 3) identified the Walnut Tree junction as a particular concern (paragraph 12.5) and proposed improvements (paragraph 13.5). This proposed improvement is a very short length of additional lane in the approach from the western arm of the B2166. We are not convinced this would do anything to ameliorate the traffic situation and it will do nothing for pedestrian safety. The previous work on pedestrian safety at this junction has indicated that the two lanes on the B2166 where it joins the junction from the east present a particular difficulty for pedestrians trying to cross that arm of the roundabout. We therefore have serious reservations about any proposal to add an additional approach lane on the western arm.

We are particularly concerned that there appears to be no cohesion between the various traffic assessments. For example, considering just the Walnut Tree roundabout:

- The Hook Lane study asserts this junction is close to capacity in the AM peak (Reference 2, paragraph 7.31)
- The Sefter Road study indicates it is operating over capacity in the PM peak (Reference 3, table 12.15)
- The Pagham South study tells us it is approaching capacity in the PM peak with or without development traffic (Reference 4, paragraph 9.12.v)

But the Addendum Transport Assessment proposes no action to mitigate any potential problems, despite the fact that it predicts this junction will reach 91% capacity in the PM peak (Reference 5, paragraph 9.6.vi).

Indeed, it appears that the difficulties of local drivers and pedestrians in this parish have received scant consideration. For example, the statement in Reference 5, paragraph 9.8 that 'drivers on the side roads will have a choice of routes to take and will no longer appear on a specific side arm if that arm appears to be more congested than an alternative route' makes an unwarranted assumption that there will always be an acceptable alternative route and represents an arrogant dismissal of local concerns.

Despite the predictions of increased traffic flow, none of the assessments recognise the potential for increased pollution of the atmosphere and noise pollution, or offer any measures in mitigation. This must be a serious concern particularly because the playground of North Mundham School is immediately adjacent to the B2166 and at a slightly lower level, and will be affected by both traffic fumes and noise. Other residents of the parish may escape the worst of the exhaust fumes but will find it impossible to avoid the increased noise. We expect to see both aspects of pollution addressed in any assessment of the impact of increased traffic.

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1 Charlmead, East Wittering, Chichester West Sussex PO20 8DN

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Arun District Council
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P/134/16/OUT- LAND NORTH OF SEFTER ROAD & 80 ROSE GREEN ROAD PAGHAM

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