

Paul Collins BA (Hons) Dip TP

Town & Country Planner

To: ADC Officers: Karl Roberts Director of Place, Neil Crowther Group Head of Planning, Kevin Owen Planning Policy Team Leader, David Easton Principal Planning Officer

ADC Councillors: John Charles (Planning Portfolio Holder), Richard Bower (Chairman of Local Plan Sub Committee, Development control Committee and Community Infrastructure Levy Sub Committee), Dawn Hall and Ashvin Patel (Ward members for Pagham)

Cc: Pagham Parish Council and Planning Casework Manager – CCT Planning Casework Unit

BY E MAIL ONLY 27 SEPTEMBER 2018

Dear All

Outline planning applications P/140/16 OUT – Land south of Summer Lane & West of Pagham Road, Pagham, P/134/16 OUT – Land north of Sefter Road & 80 Rose Green Road, Pagham, P/6/17 OUT – Land north of Hook Lane, Pagham, P/25/17 OUT - Church Barton House, Horns Lane, Pagham

I am instructed by Pagham Parish Council (PPC) in these matters.

Pagham Parish Council has been advised by PCU that Arun District Council DC intends to determine these applications at a Special Development Control Committee (SDC) on 24 October 2018 and that should the Council be minded to approve any of the applications the Council has agreed not to issue a decision notice until the Secretary of State has decided whether or not they should be called – in. **Please can you confirm that this is correct by return.**

In the meantime Pagham Parish Council wishes to make the following representations in respect of these applications so that Officers may refer to same in any report/reports that are prepared for a determination of the applications at the SDC meeting on 24 October 2018.

1. It is considered that ADLP Strategic Housing Allocations SD1 and SD2 were and remain ill-conceived and undeliverable and are in conflict with paragraphs 8 and 9 of the RNPPF July 2018 because:
 - a. they will not help to achieve sustainable development in Arun District or Chichester District and will not deliver net gains across each of the economic, social or environmental objectives of such development and
 - b. do not benefit from the presumption in favour of sustainable development at RNPPF Paragraph 11 a) and b).
2. Furthermore the development as now proposed does not represent sustainable development and the applicant(s) has/have failed in any case to provide sufficient evidence to demonstrate that the proposals described by these applications benefit from the presumption in favour of sustainable development at RNPPF Paragraph 11 d) i) and ii) because:

- a. The proposals do not accord with policies in the Framework that protect areas or assets of particular importance and
 - b. The applicant(s) has/have not demonstrated that the adverse impacts arising from these proposals will significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
3. Notwithstanding 1 and 2 it is considered that any consideration or determination of these applications by ADC is premature. The development proposed is so substantial and its cumulative effect so significant, that to grant permission would undermine ongoing plan-making processes by predetermining decisions about the scale, location and phasing of new development throughout the district and in the adjoining Chichester District that are not only central to those plan making processes but should also be determined by those plan making processes and not by way of individual planning applications
4. Notwithstanding 1 – 3 it is considered that the proposals described by each of these separate applications are not as a matter of principle in accordance with the material development plan policies and there are no material considerations that indicate the decision should be taken otherwise than in accordance with those policies. Therefore, PPC considers that the applications should be refused at this date for the following reasons:
 - 1 The applicant(s) has/have failed to demonstrate that the proposed development can be undertaken alone and/or in conjunction with other proposed development in accordance with the requirements of Policies SD SP1a Strategic Approach, GI SP1 Green Infrastructure and development, H SP2 Strategic Site Allocations and SP2a Greater Bognor Regis Urban Area (SD1 & SD2) in the Arun District Local Plan 2018.
 2. The applicant(s) has/have failed to demonstrate that the proposed development can be undertaken alone and/or in combination with other proposed development in accordance with the requirements of Policy ENV DM2 Pagham Harbour in the Arun District Local Plan 2018.
 3. The applicant(s) has/have failed to demonstrate that the proposed development will alone and/or in combination with other proposed development provide for the relevant infrastructure requirements for the SD1 and SD2 site specified in Arun District Local Plan 2018 Policies INF 1, INF 2 and the associated Infrastructure Delivery Plan and have not provided a CIL compliant S106 bi lateral or unilateral undertaking

Pagham Parish Council has not been involved by Arun District Council in any aspect of their consideration of these applications and relevant material information on the Council's web files remains incomplete at this date so Pagham Parish Council reserves the right to comment further when and if Officers reports for the DCC on 24 October 2018 are made available.

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