

ALDINGBOURNE PARISH COUNCIL
Clerk – Mrs JKM Brown ACIS
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28th November 2016

Dear Sirs

Re: Application for approval of Reserved Matters at Hook Lane, Westergate, Sussex, PO20 3TE (ADC reference AL/107/16/RES)

Aldingbourne Parish Council objects to the application for approval of the reserved matters and I write to provide a review of the most salient issues associated with the proposed residential development at Westergate Street, east of Hook Lane, Westergate, Sussex, PO20 3TE (the 'Applications Site'): 'Application for Reserved Matters application following Outline Planning Permission AL/39/13 for the demolition of Oakdene and all other structures within the site and the erection of 79 dwellings, public open space, children's play areas, landscaping, drainage measures, sub-station, pumping station and all other associated works.'

1.0 Background

1.1 Outline Planning Permission

The Secretary of State, in an appeal decision referenced APP/C3810/A/14/2220943, approved the principle of residential development at the Application Site on 23rd February 2015. The approved development included the demolition of Oakdene and all other structures within the site and the erection of a residential development of up to 79 dwellings, public open space, children's play areas, landscaping, drainage measures and all other associated works including access. Appearance, landscaping, layout, scale and access within the site were all reserved matters (the subject of this current application).

The applicants, Hallam Land Management Limited, entered into a Section 106 (S106) Agreement under the Town and Country Planning Act 1990 (TCPA) with Arun District Council (ADC), the Landowners and West Sussex County Council on 11th December 2014. The S106 agreement sets out that 30% of the 'dwelling units' approved will be affordable. The S106 notes that the location of the affordable housing will be determined at Reserved Matters stage.

1.2 Aldingbourne Neighbourhood Development Plan 2014 - 2034

The Aldingbourne Neighbourhood Development Plan (ANDP) passed referendum on 18th October 2016 and is now a 'made' plan which forms part of the Development Plan. The policies contained within the ANDP are therefore relevant to the determination of the Proposed Development.

2.0 Local Policy Assessment

The Parish Council considers a conflict with the adopted and/or emerging Development Plan policies exists.

2.1 Density

Policy H3 of the recently made ANDP deals specifically with ‘Housing Density’. It states:

‘The density of new development shall be appropriate to its location by virtue of size, siting and relationship to existing properties.’

The reason for this policy is stated at paragraph H3.1:

‘To ensure that it does not harm the established character and appearance of the local area by the over development of sites giving rise to cramped and out of character developments.’

The Outline Planning Permission approves the principle of development for ‘up to’ 79 dwellings. Consideration of density/layout and whether this number of dwellings on the Application Site would be in-keeping with the character of the surrounding area were not considered at outline stage. Taking into consideration the density of the surrounding area , which the developers indicated with their original application have a density of between 13dph and 23 dph, it is clear that the Proposed Development, which has a density of 34 dph, is materially higher than the existing properties, and thus considered to be in direct conflict with Policy DSP 1 of the eALP and Policy H3 of the ANDP. Given that both of these policies relate to the supply of housing they might be considered ‘out of date’ as set out at paragraph 49 of the NPPF. Nevertheless they can still be afforded significant or even ‘substantial weight’ in the determination of planning applications (as was the case in respect of the recent Yapton Appeal Decision).

2.2 Affordable Housing

It is recognised that there is a commitment to provide 30% affordable housing in the Section 106 agreement dated 11th December 2014. However, the recently made ANDP also deals with affordable housing and seeks a higher level of provision. Policy H4 states in full:

‘Any proposal for 10 or more new dwellings should include 40% affordable units, unless this can be demonstrated to make the scheme unviable. The size and tenure of affordable units should reflect latest available housing needs evidence.’

It is recognised that the 30% level of affordable housing provision has already been agreed through the grant of the Outline permission and the associated s106 agreement. However, it should be noted that this level of provision is not consistent with the recently made ADNP. With regard to the distribution of affordable housing within the Proposed Development, it is considered that whilst there appears, to some extent, to be an attempt at integrating these dwellings with the market housing (Tenure Plan 160104/TP Rev B), they could be interspersed more effectively across the site rather than grouped in three areas. eALP Policy HSP 2 states in part:

‘Affordable housing must be visually indistinguishable from market housing with large groupings of single tenure dwellings or property types avoided. Affordable housing units shall be permitted in small clusters throughout development schemes.’

There are 24 affordable housing units proposed and 12 of these are grouped adjacent to the western boundary of the Application Site and adjacent to a proposed parking area and sub station to the north west. It is considered that the grouping of 50% of affordable units in one location on the Application Site represents a large grouping which conflicts with Policy HSP2 of the ALP.

2.3 Housing Mix

The mix of dwellings associated with the proposed development is as follows:

2 bedroom dwellings – 39%
 3 bedroom dwellings – 46%
 4 bedroom dwellings – 11%
 5 bedroom dwellings – 4%

The Updated Housing Needs Evidence for ADC (September 2016), produced by GL Hearn, provides the most up to date assessment of housing need in Arun District. Table 1 of this document sets out the ‘suggested broad mix of housing type and tenure’ for the District:

	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/Starter Homes	15-20%	50-55%	25-30%	0-5%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

This table clearly shows that the highest need is a requirement for 2 bedroom dwellings. In contrast the Proposed Development proposes a higher proportion of 3 bedroom dwellings. No 1 bedroom dwellings are proposed whereas the GL Hearn report demonstrates a significant need for 1 bedroom affordable dwellings (35-40%). The dwelling types for affordable housing associated with the development have not been provided. However it is clear that the lack of provision of 1 bedroom dwellings fails to meet the objectives of the emerging ALP and that the Proposed Development is therefore in conflict with Policy HDM1.

In addition, ADNP Policy H2, on Housing Mix, states in part:

‘Proposals for new housing must deliver a range of house types, sizes and tenures. Applicants should demonstrate how the proposal will meet local needs.’

It is not considered that the applicant has sufficiently demonstrated this, and so for the reasons outlined above it is considered that the Proposed Development also conflicts with ADNP Policy H2.

ADNP Policy H4, on Affordable Housing states in part:

‘The size and tenure of affordable units should reflect latest available housing needs evidence.’

It is clearly evident that the size of affordable housing units does not reflect the latest available housing needs evidence, with no 1 bedroom dwellings provided. The Proposed Development therefore conflicts with ADNP Policy H4.

2.4 External Space Standards

Policy D DM3 of the eALP sets out external space standards for residential development. As no schedule of accommodation appears to have been provided it is difficult to establish whether the standards have been met for all of the proposed dwellings. However, it is evident that the 'small semi-detached' dwellings proposed do not meet the required minimum standard of 65sqm. More information is needed but in any case, it is clear that the Proposed Development is contrary to eALP Policy D DM 3. The Design and Access Statement only refers to minimum depth standards' with no mention of the 'area' standards.

ANDP Policy H8, on Outdoor Space, states in full:

'All new dwellings must include an outdoor amenity space of adequate size and quality, either as a private garden or shared amenity area.'

For the reasons outlined above it is considered that the Proposed Development does not provide adequate private garden space and it is therefore in conflict with ANDP Policy H8.

Drainage

The Parish Council has already provided outline comments on the applicant's site drainage proposals. Their surface water drainage strategy is clearer from the more detailed plans provided but having seen the plans we are even more convinced that their drainage proposals will not work and that all our previous comments apply.

The design takes no account of potential groundwater level rises, for the ponds to work it would need to be extremely deep, be well below the water table, would need to be lined and made heavy enough that it doesn't float. The scheme as designed has not allowed sufficient land area to provide a pond of the size and depth required. There is no vehicular access to the SW pumping station and the design does not allocate enough land area for this.

1.3 Conclusions

The Proposed Development conflicts with adopted and emerging Development Plan policies in relation to: density (eALP Policy DSP 1 and ANDP Policy H3); affordable housing (eALP Policy H SP2 and ANDP Policy H4); housing mix (eALP Policy HDM1 and ANDP Policy H2 and H4) and external space standards (eALP Policy D DM3 and ANDP Policy H8). Adopted and emerging Development Plan policies relating to the supply of housing can still be afforded substantial weight in the determination of planning applications (as in the Yapton Appeal Decision).

In addition the drainage scheme proposed is inadequate, particularly for the density of housing proposed. It is not consistent with Policy EN5 of the Aldingbourne Neighbourhood Plan. We draw the Council's attention to the whole text of this policy.

The Parish Council therefore objects to the application covering the reserved matters.

Yours sincerely

Mrs JKM Brown ACIS
Clerk to Aldingbourne Parish Council