

8 July 2022

Delivered by email

Ms Katie Sharp
Arun District Council
Maltravers Road
Littlehampton
BN17 5LF

Dear Katie

**PHASE 1, LAND OFF ARUNDEL ROAD, ANGMERING BN16 4ET (APPLICATION REF. A/46/22/RES)
APPLICATION TO PARTIALLY DISCHARGE CONDITION 1 PURSUANT TO OUTLINE PLANNING
PERMISSION (APPLICATION REF. A/207/21/PL)**

We write on behalf of our client, Redrow Homes Ltd ("Redrow"), following recent correspondence with Arun District Council ("ADC") on the above planning application – A/207/21/PL - and discussions regarding the re-submission of supporting documentation to address Officer and consultee comments. Thank you for your assistance on this matter. Redrow are keen to continuing working proactively with Officers to address concerns raised and commence development on-site.

As you are aware, the wider site currently benefits from an extant planning permission under reference A/122/19/OUT, and this application has come forward to deliver a 'Phase 1' of the proposed development.

Phase 1 of the development focusses upon the delivery of 7 residential dwellings from the primary access road along Arundel Road, the gateway open space and the SuDS basin, alongside associated landscape, ecological mitigation and internal access arrangements.

As outlined at the previous meeting, this application seeks reserved matters approval for 7 dwellings in line with the approved Design Code (A/235/21/DOC), and the requirements under the outline planning permission. As reflected under Condition 40 of the outline permission, there are provisions within the outline planning permission decision notice for the development to be delivered in phased manner, this is a common approach to the delivery of large-scale development. Redrow also acknowledge that it is important that the scheme reflects the approved Design Code and other relevant planning conditions, which we consider that it does. Crucially, the approval of the 7 units would not prejudice the ability of the future phases of development to deliver against the requirements of the Outline Planning Permission, including the Design Code.

Given the limited number of units proposed within this reserved matters application, it is not possible to address all the site wide policy/mix/parking requirements within this single reserved matters application. However, in our view, any subsequent approval of Phase 1 reserved matters does not compromise the ability for any wider policy

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requirements to be achieved across the balance of the outline planning permission and in line with the parameters and broad commitments made within approved Design Code.

In any event, the wider reserved matters application which is currently being considered for determination has been subject to separate discussions with Officers, and an amended submission will be made in due course.

As you are also aware, the timely approval of Phase 1 is also fundamental to ensuring that the ecological works relating to Dormice, can be undertaken within the appropriate survey window (typically Summer through to Autumn), including applying for a Natural England license. Without securing these ecology works this year, there will be a significant delay to Redrow's ability to start on site (currently programmed for later this year) and therefore the delivery of much needed housing against the Council's 5-year housing requirement, which currently stands at only 2.4 years supply.

Redrow are keen to work collaboratively with the Council to resolve the outstanding matters raised and work towards a positive outcome for the 7-unit RM at the earliest opportunity.

RE-SUBMITTED MATERIAL

As part of this re-submission, the following material has been submitted for consideration by Officers and consultees:

- Updated drawings (see Appendix 1)
- Design Code Compliance Document
- Phase 2 Ecology Report (including updated surveys)
- Updated landscape drawings (See Appendix 1)
- Drainage Strategy

RESPONSE TO OFFICER COMMENTS

We have set out below a response to the comments provided by Officers under cover of email dated 8th June 2022 (and discussed during our subsequent meeting) with regard to the submitted material.

As referenced above, a Design Code Compliance Document is also provided, which demonstrates how the proposed submission aligns with the approved Design Code; it also includes a summary of the changes undertaken since the application was originally submitted. The submitted material demonstrates that the approval of the 7 unit RM would accord with the approved Design Code and will not prejudice the design and housing mix of future phases of development.

The response summaries the changes proposed and provides the Applicant's position where further consideration has been given.

Officer Response (repeated verbatim)	Redrow response to comments
The 7 units are 4 bed dwellings, the housing mix has not been justified.	The mix has been updated to provide the following: – 4 x 3-bed units – 3 x 4-bed units The 7 units now delivers a mix of housing sizes.

	Additionally, as mentioned above, the housing mix secured under this reserved matters will not prejudice discussions regarding the balance of the outline planning permission and wider reserved matters application; the delivery of a mix of housing types, tenures and sizes can be successfully be achieved by future phases, which will deliver the large proportion of the site (the 7 units comprises only a small proportion of the wider site).
No housing provisions for older people or those with disabilities.	This application forms Phase 1 of the development. The provision of M4 (2) / M4 (3) has been secured under Condition 34 of the whole outline planning permission and the approved Design Code and therefore relates to the entire site. The provision of these units will be secured through the wider reserved matters application in line with the outline planning permission. The 7 unit scheme does not prejudice the ability of the wider scheme to deliver against this requirement.
The Arun Design Guide sets out guidance on interface distances between houses. There are a several instances in the development layout where these standards are not met, as follows: – Plots 5 and 6 rear to plot 7 side is only 12m vs the 14m requirement – Plot 3 private rear garden is only 9.2m vs the 10.5m requirement	A plan has been provided on page 10 of the Design Code Compliance Document that demonstrates that the interface distances required within the Arun Design Guide have been secured for the proposed dwellings.
The Arun Design Guide sets out that private rear garden should be at least 10.5m deep and those front gardens provide a minimum of 2m defensible space. The layout does not meet these requirements in some instances, as illustrated in the “Coloured site layout plan- 20232 / C401A”. – Plot 6 private rear garden is only 9.8m vs the 10.5m requirement – Plot 5 private front garden is only 1.1m vs the 2m requirement	A plan has been provided on page 10 of the Design Code Compliance Document that demonstrates that the interface distances required within the Arun Design Guide have been secured for the proposed dwellings.
There is no provision in the scheme for any disabled parking. The Parking Standards SPD refers to the need to ensure 5% disabled parking provision as per Manual for Streets (MfS).	A disabled parking space is now provided which meets the 5% requirement.
The Drainage Officer currently recommends a holding objection due to insufficient information.	Information in relation to drainage was submitted via email on the 6th June 2022 to address the

To overcome this objection details should have been provided a drainage strategy including drawings and calculations for the proposed drainage layout for the 7 units and any proposed SuDS. These should take into account of any phasing or temporary works and describe how this drainage system will be integrated with the wider scheme. I understand that further drainage information has been provided, these comments are not based on the most recent documents.	drainage officer comments and a revised strategy is submitted alongside the scheme amendments to reflect the changes to the layout.
Render is proposed, this was not agreed under the design code. Approved materials for the Gateway character area are red/brown brick, tile hanging, timber boarding, red/ brown and grey roof tiles.	A plan has been provided on page 11 of the Design Code Compliance Document that demonstrates that the approved materials accord with the approved Design Code. All housetype elevations have been updated to reflect this position.
The green corridors in the Design Code masterplan have not been carried through to this application.	An overlay of the Design Code green infrastructure masterplan and the proposed layout is included at page 8 of the Design Code Compliance Document. The Plan demonstrates that the gateway/landscaping areas along Arundel Road on entering the site are being proposed. In addition, the green infrastructure along the internal access road has also been proposed. It will be a requirement for the wider reserved matters application to ensure that green corridors identified within the approved Design Code are followed through, similar to Phase 1 of the development.
No consideration has been given to the wider site and how the green infrastructure and landscape feeds into this, it is very much viewed as a standalone area. Application A/122/19/OUT and the approved Design Code Masterplan detailed a larger POS feature, with green buffer fronting onto Arundel Road and forming a green open gateway into the development. This proposal appears to have depleted this feature, whilst still providing an area of POS, the overall impact appears to have been lost. These concerns have been reiterated by the Landscape officer, their full comments are visible on public access.	As mentioned above, an overlay of the Design Code green infrastructure masterplan and the proposed layout is included at page 8 of the Design Code Compliance Document. This demonstrates broad accordance with the approved Design Code. This area of the site has been designed to ensure that high quality design is achieved that delivers a perimeter block that accords with Arun's Design Guide requirements, alongside Officers comments regarding housing mix. In addition, the building line to the east of the site aligns with the new development directly the south, which is also framed by a landscape frontage.

CONSULTEE COMMENTS

Landscape and Arboricultural (Received 5th May 2022)

The comments recommend that the landscape context of the wider site is considered including all areas of POS and buffer planting. The comments recommend that the outline application is considered

regarding the entrance POS to ensure that the site is not compromised by the depletion of the green buffer in this location.

Turley Comment: As mentioned elsewhere within this response, this reserved matters approval is only for Phase 1 of the development. The re-submission demonstrates the scheme has appropriately balanced the delivery of an appropriate mix and layout raised by Officers with the green infrastructure requirements, that delivers the gateway space and an appropriate landscape buffer to the Arundel Road, similar to the new development construction to the south of this part of the site. The gateway space forms part of the POS provision and has been designed as such. The nature and purpose of the area in front of the eastern dwellings is to focus on providing a high-quality landscape setting and buffer to the residential development.

Drainage (Received 24th May 2022)

The comments set out a holding objection until sufficient information was provided in relation to SUDs and drainage system drawings, drainage calculations and the requirement for ordinary watercourse land drainage consent.

Turley Comment: We note that further information in relation to drainage was submitted on 6th June 2022 in order to address the comments raised. Redrow are continuing to engage directly with Paul McCann at Arun District Council to agree the drainage strategy.

SUMMARY

The enclosed documentation seeks to address comments received from Officers and statutory consultees and demonstrates compliance with the approved Design Code and the outline planning permission.

This RM application represents the first 7 units of the proposed development. As set out previously, it was the intention of the Outline Planning Permission that the proposed development could forward in phases, as supported through Condition 40. Phase 1 of the outline planning permission has been designed accordance with the approved Design Code, and in accordance with Condition 40, this RM application should be considered on its own merit. There is no element of the Phase 1 reserved matters that will compromise the ability for the wider development to come forward in due course.

The approval of the 7 unit RM also serves to enable commencement of the development this year; the approval of the 7 unit RM enables Redrow to apply for a Natural England Dormice license and deliver the ecology mitigation pursuant to that license within the appropriate windows. This would enable the delivery of much needed housing against the Council's current shortfall against the 5 year housing requirement.

Redrow is committed to bringing the wider scheme forward at the earliest opportunity as reflected through the significant pre-application engagement with ADC to date and wish to continue proactive engagement with Officers through the application process.

Redrow is currently working towards the re-submission of material to ADC with regard to the wider reserved matters application that covers the remaining residential element of the wider site (subject to further discussions with Officers) and in accordance with our agreed timetable.

We trust the above sufficiently addresses the comments raised on the application to date, however if you have any further queries please contact myself or my colleague Hannah Knowles.

Yours sincerely



Emily Rickard

Planner



Appendix 1: Re-submission Documents

Document	Reference
Design Code Compliance Document	Phase 1 – June 2022 Rev B
Coloured Street Elevations	20232 - C402B
Coloured Site Layout	20232 - C401E
Street Elevation	20232 - C402A
Proposed Site Layout	20232 - P401E
Building Materials Layout	20232 - P402E
Boundary Materials Layout	20232 - P403E
Surface Materials Layout	20232 - P404E
Refuse Strategy Layout	20232 - P405E
Car Parking Layout	20232 - P406E
Storey Heights Plan	20232 - P407E
Harrogate – Floor Plans and Elevations	20232 - P408B
Richmond – Floor Plans	20232 - P412
Richmond - Elevations	20232 - P413
Shaftesbury – Plans and Elevations	20232 – P414A
Stratford – Plans and Elevations	20232 - P415B
Single Garage – Plans and Elevations Opt 3	20232 - P416
Oxford Lifestyle – Plans and Elevations	20232 - P417A
Harrogate Lifestyle – Floor Plans and Elevations	20232 - P418A
Wider Site Layout – PHASE 1	20232 - P420C
Pumping Station Plans	20232 - P421
Pumping Station Elevations	20232 - P422
Interface Distances Opt 3	20232 - P423B
Site Location Plan	20232 - S401B
Topographical Survey	20232 - S402
Schedule of Accommodation 4 th July 2022	20232
Coloured Site Layout – Concept Compliance Plan	20232 - SK22A
Phase 2 Survey Report	ECO01659
Landscape Strategy	JSL3924 120 Rev E
Planting Plan 1 of 4	JSL3924 520 Rev D
Planting Plan 2 of 4	JSL3924 521 Rev C

Planting Plan 3 of 4	JSL3924 522 Rev C
Planting Plan 4 of 4	JSL3924 523 Rev D
Drainage Statement	C86473 JNP 66 XX RP C 200 2
Drainage Strategy – 7 units	C86473 JNP 92 XX DR C 7300 (Rev P03)