

PLANNING STATEMENT

'LAND EAST OF SHRIPNEY ROAD, SHRIPNEY'

'Outline application for up to 46 dwellings together with access with all other matters reserved on land east of Shripney Road, Shripney.'

SEPTEMBER 2019

Luken Beck

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On behalf of:

Hanbury Properties Ltd

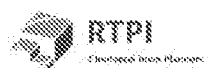
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Director and Practice Manager: Ian Johnson B.Sc (Hons), M.A., PG Dip UD, M.P.T.P.L.
Exec Consultants: Graham Beck JP, M.B.A., U.B.(Hons), B.A.(Hons), Dip.T.P., M.R.T.P.L., M.C.M.I.
Mark Luten M.B.A., B.Sc.(Econ) (Hons), Dip.T.P., M.P.T.P.L., M.C.M.I.
Company registered in England & Wales No. 7546836

VAT Registration No. 310267560



1 Introduction

1.1 Luken Beck Ltd have been instructed to support the preparation and submission an application for outline planning permission for this site. This Planning Statement accompanies and explains the application proposals for residential development on the land. This statement is submitted on behalf of the applicant, Hanbury Properties Ltd following on from a series of detailed site assessments and community engagement, which have informed the illustrative material submitted in support of the application.

1.2 Objectives

1.2.1 This statement begins by providing a description of the site, its constraints, and an overview of its surrounding context. The statement then moves on to evaluate any planning history for this land, and any relevant recent planning history on land in its vicinity. The statement then presents the planning policies and associated issues germane to the consideration of the application by Arun District Council and provides an analysis of the impacts and benefits of the development, before concluding.

1.3 Application Content

1.3.1 In addition to this statement the following documents have been submitted as part of the planning application:

- Planning Statement
- Statement of Community Involvement
- Design and Access Statement
- Ecological Appraisal & and supporting Phase II Bat Surveys
- Landscape and Visual Impact Appraisal
- Arboricultural Impact Assessment
- Flood Risk Assessment including Outline Drainage Strategies
- Transport Statement
- Archaeological Evaluation Report
- Utilities Assessment
- Plans and Drawings, as listed on the covering letter, which describe the scheme and include;
- Illustrative Masterplan

1.4 Scheme Overview

1.4.1 The application seeks outline permission for up to 46 dwellings, with details of the 'means of access' also included for consideration. All other detailed matters, being 'layout', 'scale', 'appearance' and 'landscaping', are reserved for future consideration. In line with the requirements of the Development Management Procedure Order 2015 the application includes a Design and Access Statement which sets out the parameters for those matters.

2. Site Context

2.1 Location & Context

- 2.1.1 The site is located on the east side of the A29 and comprises a single rectangular parcel of agricultural land. Along the highway frontage the site measures a little under 200m and the site is approximately 1.8ha in area.
- 2.1.2 Shripney is a small settlement located within Arun District Council, to the north of Bersted/Bognor Regis along the A29 trunk road. The settlement's pattern by and large is linear with development (predominantly low density residential) following Shripney Road (north/south), and separately Shripney Lane (East West). The character of development is essentially comprised of lower density residential development ranging from around 10-15 dwellings per hectare (dph) on average, though pocket areas and indeed recently consented sites will be higher.



Fig. 2.1 – Aerial photograph showing site extent

2.2 Site Description, Characteristics, Constraints

- 2.2.1 The site is flat and within the main development area of the settlement. The site is not within the Conservation Area. The frontage is lined by deciduous trees towards the southwest of the existing access road, either side of a drainage ditch that runs along approximately two thirds of the western boundary (before passing into a culvert).
- 2.2.2 Overall the site is relatively unconstrained, as we set out below, offering approximately 1.8ha of land that is relatively flat, rectangular in shape and of sufficient depth to offer opportunities for a comprehensive scheme of housing, open space and landscaping. The site is enclosed from the wider countryside by a belt of trees to the east. The land's former use does not impede redevelopment. A Constraints Plan accompanies this submission.
- 2.2.3 Landscape: The land is not within a nationally or internationally sensitive landscape designation. Parts of the site feature boundaries that are well treed, though others are open, offering significant opportunities for reinforcement and in turn to limit the effect of development on longer distance views. Trees on the eastern boundary and particularly in the south eastern corner of the site are believed to be covered by Tree Preservation Order.
- 2.2.4 Heritage: There are neither any Listed Buildings or other designated assets adjacent or near the site. Shripney has a Conservation Area but this has no physical or visual connection and is also not proximate, so we do not predict any likely adverse effects on its significance. Heritage is unlikely to be a constraint. The location of the site and historic use suggests archaeology also seems unlikely to constrain the site. A full archaeological survey has already been undertaken in conjunction with West Sussex County Council and there are no archaeological constraints.
- 2.2.5 Flood Risk and Drainage: The majority of the site is within Flood Zone 1 (lowest risk). Small areas to the south east of the site are located within Flood Zone 3; and the highway (A29) meanwhile falls within Flood Zone 2. The influence of the flood zone is caused by the highway drainage ditch which runs parallel between the site frontage and the A29 for most of the length of the site. This will not provide an unresolvable technical constraint. There is also an existing field ditch that runs along the eastern site boundary.
- 2.2.6 Biodiversity: The site is not proximate to protected European sites of ecological importance. The ecological value of the site and presence of any protected species has been reviewed by way of detailed site survey as presented by the ecological appraisal accompanying this application.
- 2.2.7 Utilities: Main grid electricity is found along the A29 and adjacent to the site offering low and high voltage connection potential. There is an existing SW pumping station in a compound adjacent to the north western edge of the site. An adopted water main runs diagonally through the site constraining but not preventing a housing layout, having regard to its associated easement.
- 2.2.8 Access & Transport: The site is accessed via the A29, which runs broadly north/south past the site on its western side. There is a bus stop and bus provision from close to the south of the site and it is possible to

reach this via existing footways the site can connect to. A gated entrance exists just north of the tree belt on the western boundary. Key facilities (including convenience retail, and employment) lie within walking and cycling distances respectively of the site. The existing footway along the west side of the A29 allows for safe walking to the northern edge of Bognor Regis.



3. Development Proposals & Engagement

3.1 Proposals

- 3.1.1 The application seeks outline planning permission for residential development (Use Class C3) comprising of up to 46 new homes (some with garages), with access, public open space and play areas, roads, parking and ancillary structures.
- 3.1.2 The application is supported by an Illustrative Masterplan, shown opposite, which includes a scheme with the full 46 dwellings shown based on a range and mix of housing types/sizes. These comprise detached, semi-detached and short terraces of up to 4 dwellings. The scheme also includes a modest number of apartments in small blocks. The application proposes to meet the full policy requirement of 30% affordable housing.
- 3.1.3 Built form would have a traditional style and format and would include a mix of predominantly two storey building, with single storey ancillary structures. Some instances of 2.5 storey units are also shown and would be used to add interest to the created streets.
- 3.1.4 Roads and parking are illustrated to use a variety of surfacing materials (tarmac and types of block paving) and support best practice urban design principles including perimeter block design. In terms of parking within the illustrative masterplan demonstrates this number of dwellings is feasible while still meeting adopted parking standards as well as sufficient space for roads that can support casual parking by visitors.
- 3.1.5 The indicative plan also reveals space reserved for informal open space and formal children's play space (in the form of a LEAP) adjacent to the eastern boundary at its centre point.
- 3.1.6 Access is taken from its existing position to/from the A29/Shripney Road by way of a new bellmouth junction to be formed placed on the western boundary in the middle third of the site. The junction design includes a footway along the southern radii. This will in turn meet a crossing point facilitated by the addition of a new 'ghost island' enabling safe pedestrian crossing to the west side of the A29/Shripney Road, where the existing footway connects Shripney to Bognor Regis, and the site to the rest of the settlement (and its facilities) to the north as well. A secondary pedestrian route through the open space within the site, is shown by the indicative layout, exiting the site in the south western corner, where it meets an existing footway and bus stop.
- 3.1.7 Estate roads are comprised of a mix of roads (with single and two side footways) and shared surfaces at appropriate points which will vary in surface material and add interest.

3.2 Engagement

- 3.2.1 These application proposals, despite their outline nature, have been subject to public engagement as detailed in the accompanying 'Statement of Community Involvement'. This comprised of direct stakeholder engagement, the submission of a pre-application request to Arun District Council and the holding of a public exhibition in early September. The level of response following the latter has been low compared with attendance.

4. Planning History

4.1 Site specific

4.1.1 There is no specific planning history on the application site of relevance to this application.

4.2 Relevant adjacent development

4.2.1 Recent residential development within Shripney has been granted consent on the following sites:

4.2.2 **BE/63/17/OUT - 'The Cottage', Shripney Road, Shripney**

Outline planning permission was granted by ADC in January 2018 for a development of 21 dwellings with details of access included. The development included provision of a new crossing and footway along/over the A29. This also included the replacement of an existing dwelling on the site and its curtilage.

Lying outside a 'Built Up Area Boundary' but nonetheless within the development area of Shripney, the Council concluded the location of the site was nonetheless not an overriding issue, having regard to wider sustainability criteria and prevailing appeal decisions available at that time¹. In weighing the balance of material considerations, the Council concluded the provision of much needed housing, including affordable homes, readily outweighed any adverse effects from the development of the site.

By way of s106 the development will meet local infrastructure demands it creates by way of developer contributions towards;

- Primary and Secondary Education, Libraries (based on formula calculation)
- Off-site public play facility – £31,806.66
- NHS/Healthcare – (Tariff based by dwelling size)

4.2.3 **BE/102/17/OUT & BE/135/18/PL - Salt Box Field, Land off Rowan Way, Bersted**

The former was granted planning permission (outline) for *"Hybrid application comprising Outline application for development of employment units, warehouse, hotel, 2No. drive-thru units, public house, gym plus engineering works, landscaping & associated works. Full application for a Warehouse (class B8), fuel island, car parking, access roads with new entrance from Shripney Road plus engineering works, open space, landscaping & associated works. Departure from the Development Plan."* Permission remains extant having been granted in late December 2017.

The latter which proposes the following modified mix of uses is a current undecided hybrid application with outline elements including B1-B8 employment uses, and a full application for a B8 Warehouse, fuel island and parking, 2 no. B1/B8 employment units with parking and servicing, an A1 retail food store, 2 "drive-thru" units, a car showroom, workshops, vehicle storage, display and service areas, and associated access, engineering and landscape works.

¹ Sack Lane, Aldingbourne, APP/C3810/W/16/3148035

4.2.4 **AL/58/15/OUT & AL/44/RES – Oldlands Farm, Steyning Way, Bersted**

With hybrid consent in place, for up to 20,453sqm of Class B2 general industrial and B8 Warehousing and distribution, the latter reserved matters application was granted in December 2018.

- 4.2.5 The latter two sites extend the built edge of Bognor Regis up to and beyond the A259 which had previously bound the north of the settlement, bring employment and commercial facilities (and opportunities) closer to the site than in adjacent retail park development.

5. Planning Policy

5.1 Development Plan

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan policies are considered below, together with an explanation of the way in which the proposal responds to each of these. The development plan for Arun District Council contains:

- o West Sussex Waste Local Plan 2014
- o Joint Minerals Local Plan 2018
- o Arun Local Plan 2011-2031
- o Bersted Neighbourhood Plan 2014

5.2 Relevant Plan Documents & Policies

Arun Local Plan 2011-2031

5.2.1 This plan was adopted in July 2018 and sets out the spatial strategy for the District for the next 20 years. It will be due for review by 2023 in line with requirements in the National Planning Policy Framework. A full range of policies will be applicable to the detailed stage of submission, but this application is concerned with matters of principle concerning the proposed land use, and whether the amount and characteristics of development are likely to be suitable, as well as with the detail so far as the access proposals are concerned. Thus, particularly relevant policies include;

- SD SP1 Sustainable Development
- SD SP2 Built-up Area Boundary
- C SP1 Countryside
- LAN DM1 Protection of Landscape Character
- AH SP2 Affordable Housing
- H DM1 Housing Mix
- H SP1 The Housing Requirement
- D SP1 Design
- D DM1 Aspects of form and design quality
- D DM2 Internal space standards
- ENV DM4 Protection of Trees
- ENV DM5 Development and Biodiversity

- GI SP1 Green Infrastructure and Development
- OSR DM1 Open Space, Sport and Recreation
- T DM1 Transport and Development
- T DM2 Sustainable Travel and Public Rights of Way
- W DM2 Flood Risk
- W DM3 Sustainable Urban Drainage Systems

- 5.2.2 The plan was subject to close examination in 2018 with particular scrutiny given to the objectively assessed needs for the district and how the plan would meet that need. The plan includes several large scale housing allocations, including in this part of Arun District a large strategic allocation for 2,500 new homes is included in the plan ('West of Bersted') and nearby 'Barnham Eastergate Westergate' for 2,300 homes within the plan period (a further 700 thereafter). Whilst the new ALP the plan allows for the growth of sustainable villages whilst maintaining their setting within the open countryside (SD SP1a, c.) Shripney is not provided with a designated 'Built Up Area Boundary'. Consequently, the development of housing in and around the settlement will typically fall to be considered under policy C SP1 and as 'countryside'. Here the plan advocates a general restraint upon housing development with some exceptions.
- 5.2.3 While not a preferred location under plan policy for housing growth it is, nonetheless, relatively 'sustainable' as evidenced by recent conclusions by ADC to grant planning permission for housing on a site to the north ('The Cottage'; see section 4). Following careful assessment of that site's respective accessibility and relationship to local key facilities and services the Council concluded that the development of that site for housing was not incompatible with the goals of national planning policy or many of the aspirations of the local plan. This site, lying over 200m closer to facilities on the northern fringes of Bognor, is somewhat more accessible than 'The Cottage' site. It is similarly unconstrained, as set out by this report, making it another suitable and deliverable site.
- 5.2.4 It is important that the current Local Plan's policies for the distribution and provision of residential development can not be considered 'up to date' if the Council cannot demonstrate an adequate supply of housing land, even despite the plan's relatively recent adoption. In line with paragraph 11 of the Framework, ADC must place significant weight on securing housing and that requires the Council to apply the 'tilted balance' by way of a presumption in favour of sustainable development until it can demonstrate a robust housing land supply position.
- 5.2.5 It does not follow that every site will become suitable for housing; proposed developments will still need to be sustainable in all other regards for the purposes of National Policy. Where housing land is in shortfall LPAs should adopt positive and creative thinking to identify those sites which are and seek to be proactive and find solutions that can make development acceptable. Housing on this site can make a valuable contribution to housing supply needs, and particularly to local needs for affordable housing. As an important tenet of national planning policy to significantly boost the supply of housing LPAs must commit to meeting, as a minimum, their adopted housing requirement.

Bersted Neighbourhood Plan 2014 to 2029

- 5.2.6 As the ADC Local Plan is relatively newly adopted it is more up to date than the Bersted Neighbourhood Development Plan which predates the Local Plan by almost 4 years. Thus, the former's newer policies take precedence over equivalents in the BNDP where there is any overlap and especially where there is any conflict. In any event as set out by the National Planning Policy Framework 2019;

"Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

Therefore, we have not focussed significant attention on the BNP for the purposes of this statement.

- 5.2.6 We note that the context in which the BNP policies were prepared is also important if / wherever they are applied in light of the newer Local Plan provisions. The degree of conformity between plan policies is an important consideration in their treatment/weight.

For example, policies like HDQ4 (Housing Mix) were predicated on the scale of development forecast by, and at the time of, the neighbourhood plan's preparation. Plainly times have moved on and there has been a step change in the predicted and agreed housing requirement in the district as realised in the new Local Plan. Other aspirations remain of relevance; we note that policy GA1 states support will be given to proposals that increase or improve upon the network of paths in the area, something this scheme can assist in delivering. It is noted also that the BNP Consultation document stated that 84% of those responding to the Parish survey supported housing for local people.

5.3 Other Material Considerations

- 5.3.1 The National Planning Policy Framework and Planning Practice Guidance remain the overarching current national planning position and best practice resource to be followed by LPAs. The "golden thread" running through the NPPF is the presumption in favour of sustainable development. Paragraphs 11 and 12 confirm that the starting point for decision making is the development plan and that development which accords with an up-to-date local plan should be approved.
- 5.3.2 Section 5 (Delivering a sufficient supply of homes) of the NPPF seeks to significantly boost the supply of housing by delivering a wide choice of high-quality homes in order to meet local community needs with the right size, type and tenure of housing needed. Paragraph 59 also makes clear the importance that land with permission can be developed without unnecessary delay.
- 5.3.3 Section 12 ("Achieving well-designed places") attaches importance to the design of the built environment and advises that good design is a key aspect of sustainable development. Paragraph 127 sets out a range of criteria which decisions should seek to achieve in approving developments, while under paragraph 130 it is confirmed that poor design that fails to take up opportunities available for improving the character and quality of an area and the way it functions should be refused (taking into account local design standards and supplementary planning documents). Albeit, paragraph 126 also

makes clear that such need to avoid unnecessary levels of detail and prescription and allow suitable degrees of variation.

- 5.3.4 Under Section 14 ("Meeting the challenge of climate change, flooding and coastal change") the Framework is clear that "local planning authorities should ensure that flood risk is not increased elsewhere" by new development and that "the aim... is to steer new development to areas with the lowest risk of flooding". In line with its aspiration to deal with flood risk and drainage proactively this application is supported by a Drainage Strategy. This strategy provides confidence that the Illustrative Masterplan is a robust demonstrator of the capacity of the site and designed holistically with drainage infrastructure in mind. Further discussion is given to this topic later in this statement.
- 5.3.5 Section 15 (Conserving and enhancing the natural environment) stresses the importance of minimising impacts and providing net gains for biodiversity, including by establishing new ecological networks, and that development should not cause significant harm to biodiversity or recognised habitats/sites that cannot be mitigated or compensated for.
- 5.3.6 Having regard to the provisions of the Framework this site represents an excellent opportunity to boost housing supply within a highly sustainable and accessible location and which, as this report goes on to demonstrate, will have negligible effect upon social or environmental factors and only a modest effect on landscape character and visual amenity.
- 5.3.7 A number of adopted Supplementary Planning Documents (SPDs) and other relevant planning guidance, serve as additional material considerations. These include;
- Arun Parking Standards (Draft) – Consulted on through July 2019 this consultation draft version is adapted from West Sussex County Council revised standards. It is believed ADC are seeking to apply these working standards.
 - Arun Parking Standards Adopted October 2000 – the previous standards; it is not clear on the present status of this document.
 - Arun District Public Open Space, Playing Pitches and Built Facilities – (Draft) Also consulted on through July 2019 this is not available on the Council's web site and it is not fully clear what the present status of the document is.
 - Arun Open Space and Recreation Standards – Adopted October 2000 – These previous standards are broadly speaking based upon the NPFA Six Acre Standard requiring 24 sqm per person.
 - Community Profile: Bognor Regis – This document was published in 2013 and supported the local plan as part of its broad evidence base. The document makes clear that the "*need for affordable housing is a critical issue in rural areas, with house prices increasingly beyond the reach of many groups wanting to stay in, or move to, the local area.*" The profile notes that the Affordability Ratio is significantly worse in the area, than across England (average) despite housing being cheaper than the England wide average for all types of homes. The Housing Environment section identified significant numbers of households (almost double the national average) live in overcrowded conditions.

6. Planning Considerations

6.1 Principle of Development

6.1.1 The application does not seek detailed approvals, save regarding access. The purpose of this outline planning application is to put forward the case for the principle of residential development, and to demonstrate an appropriate amount of development. This is supported by the conclusions of a full suite of detailed technical appraisals.

6.1.2 Shripney is not a settlement with a defined 'Built Up Area Boundary'. Described as a hamlet by the Neighbourhood Plan, Shripney lies to the north beyond the present built 'limits' of Bognor. This leaves the site in conflict with policy C SP1 as the site's status is 'countryside' and the proposed development is for market led housing rather than one of the exceptions envisaged by the plan. The site is otherwise undesignated and therefore not 'sensitive' in this regard. Further the conflict with C SP1 should be given reduced weight as it is a policy deemed to be 'out of date' by national policy criteria. This is because, as set out below, evidence suggests the Council cannot demonstrate a satisfactory housing land supply. Thus, the site must be positively considered, in line with paragraph 11 of the Framework, and with emphasis on promoting sustainable development to solve the present housing supply deficit. This is the approach the Council has already taken in Shripney with the redevelopment of 'The Cottage'.

6.1.3 As Paragraph 11 of the Framework sets out where relevant policies "*which are most important for determining the application are out-of-date*" planning permission ought to be granted unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

6.1.4 Footnote 7 to that paragraph clarifies this will include where an LPA cannot demonstrate a five-year supply of deliverable housing sites. As clarified in this statement the site is not within an area that is "protected" for environmental reasons or sensitive in terms of heritage assets. Owing therefore to the findings below we believe this site and proposals represent a sustainable option for housing development with significant benefits to housing supply and to contributing in particular to reducing the shortfall in the availability of affordable housing.

6.2.1 Housing Land Supply

6.2.2 The Council has not published a recent Annual Monitoring Report or, separate Housing Land Supply position statement but in recent years the matter has been reported on by the Council and separately by Inspectors determining planning appeals. Owing to the shortfall involved it is not necessary to undertake a full detailed review but is sufficient to compare available via historic statements on the matter and contemporary evidence.

6.2.3 On the 12th February 2018 the Secretary of State upheld an Inspector's decision on 'Land West of New Barn Lane, Bersted' allowing planning permission for 50 homes, and confirming the supply of housing position (with 20% buffer applied) was 2.07 years.

- 6.2.4 The Housing Delivery Test results, published by MHCLG in November 2018, confirm that over the period 2015/2016 to 2017/2018 a total of 2,214 homes were delivered in the district against a target of 2,423 (91%). 2015/2016 had a much lower housing requirement, which increased by 50% thereafter, as well as comparatively much stronger performance (902 homes delivered vs. 610 requirements). This masks the weaker later performance in this period in the overall HDT result. As part of the HDT results an action plan is required of ADC. Judged by the last available two years (e.g. 2016/2017 and 2017/2018) delivery performance drops off significantly to 72% (1,312 vs a targeted 1813). This also lags some way further behind the housing requirement trajectory set out in policy H SP1.
- 6.2.5 In June 2019 the Council published its latest Authority Monitoring Report. This concluded that the forecast housing land supply had dropped from 5.3 years and below the requisite minimum, to 4.7 years, since publication in July 2018 of the Local Plan. This conclusion is also based on a 5% buffer assumption when performance historically and under HDT measures points to a likely 20% buffer requirement. The application of a 20% buffer, on AMR information, would reduce housing land supply further to approximately 4.1 years. Furthermore, the Council will be aware of the recent changes to the (February 2019 revision) Framework's treatment of outline consents. These must now be demonstrably capable of yielding housing completions within 5 years. There is no evidence the AMR has taken this into account, and delivery rates presupposed in Appendix 2 to the AMR support this. This is significant as 82% of the supply from "Large Site Commitments" are in outline in this study.
- 6.2.6 Turning to more recent performance, thus far 2019 has seen consents for large scale housing (mainly on allocated sites) at Angmering (700), Yapton (550) and Pagham (365). A review of planning decisions available via the Arun District Council website shows that at the time of writing in 2019 a total of c1700 dwellings have been consented. However, most are already accounted for separately in the AMR's predicted supply from the aforementioned locations.
- 6.2.11 Looking objectively at this, against an adopted housing requirement of 919 homes per annum set by the Local Plan (see section 12, para. 12.1.4), there is no evidence that housing land supply has improved since the publication of the AMR in June. Indeed, given the passage of time it seems likely to have worsened, and there may be an impending need to apply a 20% buffer. The Council should therefore continue to treat favourably the principle of otherwise suitable and sustainable housing sites for the immediate future, much as it did with the nearby 'The Cottage' site (see Relevant Planning History).
- 6.3.1 *Amount, Density and Scale*
- 6.3.2 The site has a total area of 1.8ha and the application proposes up to 46 dwellings, at a gross site density of 25.6 dwellings per hectare. This is a relatively low overall density and regard has been paid to paragraphs 122 and 123 of the Framework which call for development to make an effective use of land. This goal is reiterated in Local Plan policy D SP1. Here the chosen amount and density treads appropriately between reflecting the existing character and density, which is lower again, of housing opposite the site along Shripney Road, and using the land efficiently. The scheme, despite its indicative status, has been informed by a through analysis of the site and its context, with the application of plan policy requirements and the findings of supporting appraisals.

6.3.3 As can be seen from the Illustrative Masterplan the chosen density enables the reservation of appropriate large landscaped green infrastructure spaces and buffers around the perimeter of the site. This has several beneficial effects, including reinforcing and enhancing wildlife corridors, and breaking up the scale of development into smaller divided parcels. The latter in particular shows how to avoid a homogenised pattern and scale of housing estate (which would be estranged from the character of existing development).

6.3.4 Achieving this quantum of development the Illustrative Masterplan deftly threads a mix of housing types and sizes (as shown in Figure 6.1) together, comprising a limited number of apartments. Mostly development is 2 storeys in scale, with scope for 1/1.5 storey as well as a low number of 2.5 storey to add articulation to the scheme. Of course, this mix is itself indicative of what can be achieved within the site and is presently weighted towards smaller 'starter' size dwellings (54%) and small family homes (35%) rather than larger family dwellings (11%). This reflects the requirement for a *"balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations"* in Policy H DM1. Having regard to the SHMA² this found the greatest need would be for smaller 1 and 2 bedroom affordable homes, and predominantly for 2 and 3 bedroom market dwellings. The mix of affordable housing also meets with the indicative mix set out by policy AH SP2.

No. Bedrooms	Affordable	Market	Total
1 Bed	5	3	8
2 Bed	5	12	17
3 Bed	2	14	16
4 Bed	1	4	5
			46

Fig. 6.1 Extract from DAS (pp2) Indicative 'Accommodation Schedule'

6.4 Appearance

6.4.1 The Design and Access Statement clarifies that "elevations and materials have not been considered in detail at this outline stage however it is considered that materials will reflect the key local characteristics" within the settlement. Dwellings will follow a traditional construction and character approach, reflecting typically pitched roof/gabled two storey housing.

6.4.2 As described the context in Shripney, in terms of residential character is mainly a mix of two storey properties, mainly detached. While there are chalet bungalows (including opposite the northern part of the site) and single storey properties, there are equally some 2.5 storey dwellings with traditional format dormers serving roof space accommodation. In appearance terms a very high incidence of properties featuring painted and rendered elevations, and predominantly roofs are plain or profile tile covered (weathered/brown). Otherwise brickwork tends to feature, along with, on limited occasion

² GL Hearn 'Updated Housing Needs Evidence' Final Report September 2016

timber board cladding at first floor. There is a range of architectural styles/detailing which contribute to a more mixed aesthetic along Shripney Road, and Shripney Lane than the consistency of facing and roof materials initially presents. Front boundaries tend to be a mix of brick wall and fencing, with some more traditional instances of flint and brick walls.

6.4.3 Development will reflect key aspects of the described built-form character, across a varied range of dwelling typologies. Aided by the significant available set back shown in the masterplan, the site has the capability both to mitigate its presence in street scene views to a suitable degree while introducing a varied character of housing that complements the existing public realm.

6.4.4 The Illustrative scheme shows the capability of development meeting the relevant provisions of Policy D DM 1. The scheme is further supported by a range of technical studies which demonstrate compliance with requirements in terms of movement, legibility, retention of existing trees etc. which are set out below.

6.5 Impact to character and appearance of the site and area

6.5.1 The site is not located within a sensitive landscape designation, either of national or local importance. It retains modest value in its undeveloped state as part of the intrinsic character of countryside, but then besides this it does not make a strong contribution aesthetically to the character of the area. The site is relatively open to views from Shripney Road apart from the southern third which is screened partly by mature planting. It is relatively flat, and featureless with a backdrop of tree planting along the other boundaries, which do not quite meet to the east.

6.5.2 The application is supported by a Landscape and Visual Impact Assessment (LVIA). Undertaken by Davies Landscape Architects, this follows prevailing best practice and guidance. The LVIA also pays regard to available assessments (see Figure 6.4), that provide the baseline for landscape character.

6.5.3 The sensitive and capacity of the landscape for change are both appraised in line with established methodology and the assessment undertakes a detailed appraisal of viewpoints which the development has the potential to influence. This includes those available from the PROW network local to the site.

Table 4 - Landscape Character Assessments

Assessment	Character Area/Type	Date
National		
National Character Area	126 - South Coast Plain	2014
Regional		
West Sussex Landscape Character Assessment	Sc9 - Chichester to Yapton	2003
Local		
Arun Landscape Study:	Zone 2: 5 Villages	2006
Landscape & Visual Amenity Aspects of Development Choices in Arun District 2006 - 2026	LCA 10: Shripney Lower Coastal Plain LCT L2: Medium/Small Scale Arable	

Fig. 6.4 – Extract from LVIA

6.5.4 The assessment reaches the conclusions that the site;

- forms part of a low-lying flat landscape that is ordinary and unremarkable with medium to high capacity for housing with appropriate mitigation.
- is isolated from the wider arable land uses, being surrounded by development on its north, west and south boundaries.
- is well vegetated on its north, northwest, southeast and southwest boundaries, but more open and intermittent vegetation to the west. A tall concrete and brick wall borders part of the southern boundary.
- [visual envelope] is strongly influenced by its low lying topography and setting within the existing settlement which limits views from PRow (Public Rights of Way).
- principal views are from the houses that immediately border and lie opposite the site. Oblique views are also available from footpath FP151 to the north where a gap in the east boundary vegetation affords a view towards the southeast of the site. This will be mitigated by proposed GI and restriction on scale to 2 storeys maximum.
- remaining views from FP152, the FRR and Oldlands Farm are more minor and mostly negligible.

6.5.5 The LVIA further identifies opportunities for mitigating the influence of development on the site and these have fed in turn into the Illustrative Masterplan.

6.5.6 In conclusion the scheme has had regard to the character and pattern of settlement and countryside. The site is not particularly sensitive or influential in landscape terms and development is unlikely to have significant adverse impacts on the character and appearance on the wider character of the countryside, and only localised effects (which are subjectively modest once mitigation is taken into account) on the intrinsic character / qualities of the countryside. However as the development would reinforce the existing linear character of housing along Shripney Road/A29, and is bordered to north and south by existing housing the proposals would not be at odds with the development pattern of

Shripney, while also making efficient use of the site, and would not cause harm to its identity or setting. No further conflict would arise with policy LAN DM1.

6.6 Highway Safety / Access

6.6.1 This application is supported by a Transport Statement (TS) undertaken by Highgate Transportation. The supporting TS details the existing highway environment for vehicular and pedestrian movement. The statement reports on the findings of a review of road traffic accidents, the availability and access to public transport, and connection of the site to local facilities.

6.6.2 **Means of Access:** The report details that adjacent the site Shripney Road is single carriageway and approximately 5.5 to 6.0 metres wide. Immediately to the south of the junction with Shripney Lane, it transitions to a dual carriageway with two lanes in each direction. In the vicinity of the site, Shripney Road is subject to a 40mph speed limit, with street lighting, and a footway along its western side, but not the eastern side (there is a stretch to the south of the site though where the bus stop is). The speed restriction along the dual carriageway is also 40mph. Speed surveys have confirmed the average speeds and 85th percentile speeds. The latter are slightly higher than the limit. Accordingly, visibility splays have been designed to ensure that they accommodate for the actual measured speeds along the A29. The bellmouth leads into an initial spur of road that reduces from 6.1m to 5.5m. The junction, and the illustrative layout, have been tracked by swept path analysis for an 11.2m length refuse collection vehicle to ensure that it is robust.

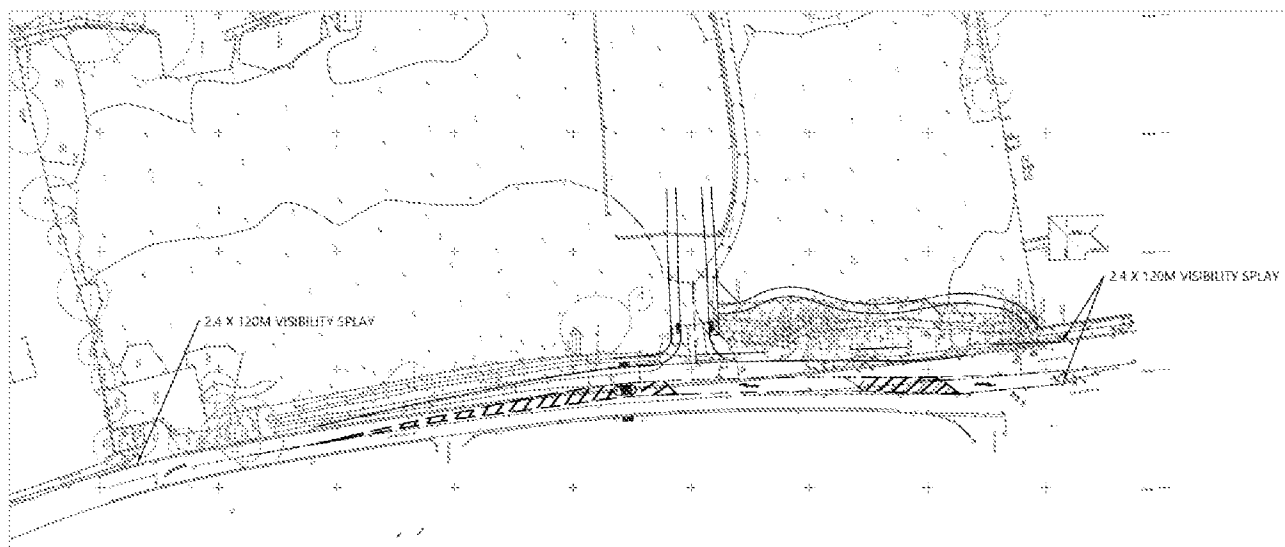


Fig. 6.2 - Extract from Transport Statement – Visibility Splays & Junction Arrangement

6.6.3 **Public Transport:** A bus stop lies 40 metres to the south west corner of the site and serves 66A and 66C services. These connect Bognor Regis and Yapton via slightly different routes with a total of five services each way Monday-Friday and four services each way on a Saturday. Services do not operate on Sundays. In terms of access to rail, nearest stations are central Bognor Regis and Barnham. *"Bognor Regis is the terminus of a branch line that connect to Barnham on the West Coastway Line. Notable stations along the route include Southampton, Brighton and Portsmouth. It is also possible to get direct trains to London Waterloo via Gatwick Airport."*

6.6.4 **Accessibility:** The proximity of local amenities is set out by both the TS and the Design and Access Statement. These confirm the present and planned range³ of retail, leisure, employment and education, healthcare and community services.

In order to provide safe access for pedestrians to the local footpath network a ghost island (priority turn junction) is proposed that enables safe crossing to the west side of the A29 to use the existing footway. Equally an internal path and pedestrian link to the footway to the south of the site along the eastern side of the A29 provides access to further crossing opportunities and the existing bus stop.

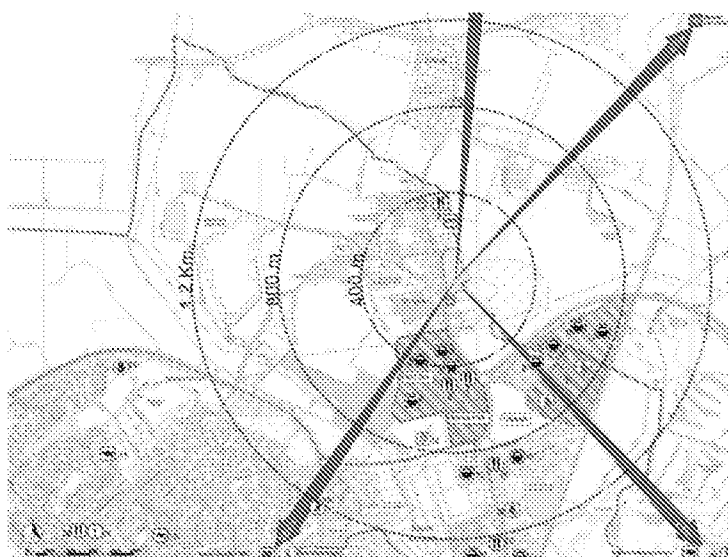


Fig. 6.3 – Extract from DAS – Accessibility to Services

6.6.5 **Parking:** Of course, as the application is in outline the layout is reserved, but the Illustrative Masterplan provides a robust basis on which to assess the quantum of development suggested by adhering to development standards required by policies of the Local Plan and supporting guidance. In this instance this involves reflecting the minimum latest standards set out by West Sussex County Council, published in May 2019. This includes the provision of;

Car parking (dwellings)

- o 1 space per one-bedroomed dwelling
- o 2 spaces per two-bedroomed dwelling
- o 2 of 3 spaces per three-bedroomed dwelling
- o 3 spaces per four-bedroom dwelling

Cycle Parking

- o One and two-bedroomed dwellings – 1 space
- o Three plus bedroomed dwellings – 2 spaces
- o Dwellings provided with garages, which will be large enough to accommodate cycle storage in addition.
- o Secure undercover cycle storage will be provided in gardens (rear/side where present) for dwellings without garages.

6.6.7 **Traffic Generation:** The TS evaluates the likely traffic generation from the modelled quantum of housing. Based on the baseline (surveyed flows by ATC between 21st and 27th March 2019) and modelled growth

³ Including on sites, 'Saltbox', 'Rowan Park', and 'Oldlands'. See Relevant Planning History.

(TEMPRO) for a future assessment year of 2024 concludes that the additional traffic from the development (234 vehicles/day, reaching 26 vehicles during the AM peak hour) will not compromise the existing highway network and *"the site access junction will operate well within capacity and with low average delays for waiting vehicles."*

6.6.8 Therefore in conclusion the scheme will not compromise highway safety and by:

- providing safe access for vehicular traffic
- demonstrating adequate parking can be provided for the amount of homes proposed
- enabling safe pedestrian connections to take full advantage of the existing footpath network and therefore the range of services/facilities; and
- maximising access to public transport by linking the site to the existing bus route to reduce dependency on car based journeys
- establishing the traffic generation will not impede the operation of the local highway network

the application demonstrates the scheme is compliant with local plan policy T SP1 and with aspirations within the Framework to promote sustainable travel modes.

6.7 Impacts to amenities of existing and proposed development

6.7.1 As the scheme is submitted in outline the Illustrative Masterplan has no status other than to demonstrate the achievability of the proposed quantum and density of housing. The Illustrative Masterplan has been prepared so as to show a sensitive relationship between proposed dwellings and existing development to the north and south of the site.

6.7.2 While the masterplan achieves what is necessary in terms of relationship standards to prevent undue overlooking, and other impacts to existing private amenities, it is clear that the respective low density offers opportunities to approach the layout of the scheme in several alternate ways at the reserved matters stage, without compromising the capacity of the site to deliver housing.

6.8 Ecology and Trees

6.8.1 The application is supported by a Preliminary Ecological Appraisal (PEA), a desktop study and walkover exercise undertaken by qualified ecologists. It identified the need for detailed species surveys for Bats, which have also been carried out and support this submission. Initial site survey was carried out on the 28th September 2018 and further surveys on the 2nd and 3rd July 2019.

6.8.2 The PEA concludes that the site is not proximate to any sensitive sites⁴, within or adjacent to any priority habitat nor affects any SSSI or locally protected sites. Consequently, impacts from the development are only likely to arise to site specific ecological interest, which the report goes on to review.

6.8.3 In respect of protected species the PEA identified no evidence of the presence of amphibians, reptiles, badgers, or dormouse. In respect of Bats, owing to the presence of an open fronted timber structure (used for storage) further Bat activity surveys (transect and static surveys) were recommended and carried out

⁴ As so defined under 'The Conservation of Habitats and Species Regulations 2017'

by KJF Consultancy Ltd. These extended to include suitable trees within the site and on its boundaries. In terms of the present condition and value of the site;

"The site is level and used as a paddock ... it would be heavily grazed, and it is unlikely that there would be any species of importance. A ditch runs between the road and the west boundary; at the time of the survey, no water was present within the ditch. Hedges and trees are growing within all the boundaries; some of the trees are mature Common oaks that are important habitats for wildlife."

6.8.4 The findings of detailed surveys in respect of the effect upon Bats are that;

"There appears to be a low population of bats that are found widespread throughout the UK that occasionally forage/pass over the site. 1 species less commonly found (the Serotine) also occasionally forages/passes over the site. 1 rare species (Nathusius' pipistrelle) also occasionally forages/passes over the site; however, this species may be more common than is presently realised. Only 2 calls were recorded during all the surveys for 1 other rare species (the Barbastelle)."

"Although a development will not adversely impact any rare species of bats; to minimise adverse impacts on bats through a development, appropriate and proportionate mitigation measures will need to be given."

Such mitigation includes a lighting strategy, and the provision of enhancements such as providing sufficient roosting opportunities in buildings (Bat bricks/bat access tiles), and ensuring complimentary planting mixes within the development.

6.8.5 It can be concluded that development of the site will not therefore cause significant adverse effects to biodiversity on the site. Indeed, having regard to the present status of the site it can be concluded that the scheme will bring about a net gain situation as the ecological value of the site under present use is presently low. Opportunities to reinforce boundaries and introduce more wildlife rich planting in areas of the development, are available. Section 4.4 of the Design and Access Statement identifies this opportunity and sets out the areas within the site where this would be most feasible.

6.8.6 Turning to trees, and the application is supported by the findings of an Arboricultural assessment (Carried out to BS5837) identify 13 significant trees that of sufficient quality and condition to be considered a constraint on a development; the trees are shown as T1 to T13 within the appended Tree Constraints plan in the document. The report identifies 4 trees and one group to be already covered by Tree Preservation Order.

6.8.7 The Tree Constraints information has informed the preparation of the Illustrative Masterplan which avoids the recognised root protection areas and orientates dwellings so as to avoid shading to properties. This demonstrates that a layout of housing, at this quantum and density compliant with the provisions of policy ENV DM4. Open spaces and planted boundaries would benefit from active management following development, and of course these boundaries would also be significantly enhanced.

6.9 Flood Risk and Drainage

- 6.9.1 This application is accompanied by a Flood Risk Assessment prepared by Ramboll UK Ltd. This identifies the geological, hydrological, and hydrogeological settings of the site. Notably the site does not lie within a Groundwater Source Protection Zone but there are aquifers beneath the site classified as 'Major Aquifer Intermediate' and (in the southern portion of the site) 'Major Aquifer High' vulnerabilities.
- 6.9.2 EA flood mapping for planning shows the vast majority of the site to be situated within Flood Zone 1, with a very small area along the western site boundary situated within Flood Zone 2 and a very small area along the south eastern site boundary within Flood Zone 3.
- 6.9.3 Ramboll UK Ltd has secured detailed flood modelling data, including flood levels for three node points across the site and corresponding modelling flood outlines, for both tidal and fluvial flood events direct from the Environment Agency. The EA flood modelling data is included in Appendix B of the FRA. This reveals that small parts of the site along the Western and south eastern boundaries are situated within Flood Zones 2 and 3, and at medium-high risk of fluvial flooding, when taking into account the predicted effects of climate change. However, the Illustrative Masterplan takes this into account to ensure that none of the residential plots are within those areas and remain in Flood Zone 1. As flooding risk affects the A29 and site frontage, Ramboll advise that occupants within the site would join the EA Flood Warning Scheme so as to be informed of extreme flood events that may impact immediate off-site areas.
- 6.9.4 In terms of surface water attenuation the FRA provides an analysis of existing run off rates, and an outline drainage strategy (Figure 3) to deal with a post development scenario with reduced permeable area. This provides equivalent attenuation, by way of permeable paving in this case to estate roads and parking areas, to limit outfall to existing rates of discharge.
- 6.9.5 Foul / Sewerage is also set out with an equivalent outline strategy included at Figure 5 and proposes to connect to the public foul water sewer and to install a new private pumping station to facilitate connection to the SW pump station.
- 6.9.6 Subject to detailed design the strategy demonstrates that the disposal of foul and surface water can be satisfactorily managed without contributing to any off-site flood risk or water quality issues. There is no conflict with policy W DM2 or the aims and objectives in the Framework.

6.10 Utilities

- 6.10.1 A Utility Assessment Report prepared by Ramboll UK Ltd accompanies this application. This sets out the availability of all usual services required including gas, electricity, sewerage, broadband etc.
- 6.10.1 The report also details the necessary upgrades that may be required and the output from service enquiries on behalf of the applicant with statutory undertakers.

6.11 Sustainable Design and Construction

- 6.11.1 As set out by the Design and Access Statement the scheme submitted demonstrates how the development will achieve the applicant's goals of bringing forwards a sustainable development. The merits of the location of the site, and the focus on maximising connectivity for pedestrians and to existing public transport opportunities, have been described above. In addition, it is proposed to incorporate a proportion of EV charging points to the development to encourage the uptake of ultra low emissions vehicles by occupiers.
- 6.11.2 The Illustrative Layout highlights how, through predominantly east/west facing plots solar gain can be maximised, while the adoption of perimeter block principles is married with approaches that maximise outward facing development where possible while retaining substantive landscape/GI buffers to undeveloped boundaries.
- 6.11.3 The development will incorporate SuDS to ensure surface water flows will maintain greenfield run-off rates, and better manage peak flows/rainfall on to the site by more effectively directing water to positive drainage features. Energy and Water consumption will adhere to contemporary standards set out by the Building Regulations.
- 6.11.4 Dwellings will seek to conform with wider requirements of meeting Building Regulations in respect of energy performance (Code level 4 equivalent) and water consumption.

6.12 Heritage & Archaeology

- 6.12.1 The site is not proximate to any listed buildings, scheduled monuments, or other non-designated assets of importance. The site is also well separated from the Conservation Area to the west, the setting of which is unlikely to be affected due to distance and intervening development.
- 6.12.2 A "Pre-determination Archaeological Evaluation" concludes on a programme of archaeological evaluation of the site. Further to the results of the evaluation, which included an intrusive site investigation (trench evaluations) the report concludes this has adequately recorded the date form and function of archaeology present within the site area.

7. Conclusions

- 7.1 This statement sets out the credentials of the site with reference to supporting appraisals and the Illustrative Masterplan. Drawing on the appraisals made by the Transport Statement and Design and Access Statement it is evident that while the site lies within the envelope of Shripney it is within reach of a good range of existing facilities, particular employment, retail and recreational on the northern edge of Bognor (as well as the few facilities within Shripney as well). Public transport and good footpath links reinforce this level of accessibility and provide viable alternatives to car-based journeys.
- 7.2 Presently, plan policy identifies the site as lying within the countryside, and therefore in conflict with policy. SD SP2 Built-up Area Boundary and C SP1 Countryside which seek to direct development away from sites that are outside of BUABs and recognise the intrinsic values and character of the countryside. The submitted LVIA demonstrates that save for this intrinsic character, the development would not result in significant adverse effects in terms of landscape character or visual amenity. Any such impact from the development is heavily mitigated as well by the scope to reinforce existing boundaries and the green infrastructure buffers that could be retained by this scale of development. Impacts would also, in our view, be slight. The size and shape of the land, and its position between frontage residential development north and south of the site means that development would reinforce the existing linear pattern of development along the A29, rather than expanding the settlement into the countryside. The Masterplan meanwhile demonstrates a high quality, sympathetic approach to layout and density which making an efficient use of the site.
- 7.3 In technical terms, the site is also sound, providing for safe access to the highway network, lying within Flood Zone 1 so far as the siting of housing is concerned, and is not environmentally constrained in terms of biodiversity or trees. The site is therefore a solid candidate for residential development, save for the aforementioned plan conflict.
- 7.4 As has been identified, however, despite Arun's relatively recent adoption of its new local plan the Council is unable to demonstrate a robust housing land supply. The implications of this in the NPPF are clear; policies which constrain the provision or distribution of housing are to be considered out of date and development proposals considered in line with the Framework's presumption in favour of sustainable development. Moreover, unless the impacts of the development would "significantly and demonstrably outweigh the benefits" of the development "when assessed against the policies in the Framework as a whole" then planning permission should be granted. The scheme therefore falls to be considered in a similar vein to development consented at 'The Cottage', some 200m+ north of the site.
- 7.5 The proposed development would provide 46 dwellings with 30% as affordable housing and would contribute toward necessary local infrastructure as required. This would make a significant additional contribution to housing land supply in a reasonably sustainable and accessible location. Moreover, the development would be viable, falling on greenfield land and being unaffected by abnormal development costs⁵. It would therefore be deliverable. The scheme is of a size that it can provide a reasonable offer of public open space, and enhancement and net gain for biodiversity. In respect of the former the provision of a children's play area within the site would also be of benefit to the rest of Shripney.

⁵ This includes provisioning and upgrading of services/utilities which have been estimated – See Utilities Assessment

7.6 Additional benefits of the proposals which are typical to most development would also include;

- Community Infrastructure Levy payments (subject to adoption) or complement of s106 funding towards local facilities and infrastructure
- Additional income expenditure supporting local facilities and the nearby centre uses.
- Contribution of direct jobs, and associated training and skills to the local labour market (construction)
- New Homes Bonus

7.7 On this basis the proposals are commended to the Council and it is respectfully requested that planning permission be granted, as the benefits of the scheme would clearly outweigh the impacts.