

From: Simon Davis

Sent: 11 March 2020 17:46

Subject: RE: BE/109/19/OUT - Land East of Shripney Road

Dear Nigel,

Sorry for the delay in responding but I have now managed to find the time to give this some proper attention and have also discussed further with Charlotte. See my comments below:

18FP1 (Land at Stanhorn Grove) - This should be excluded from the assessment (so not discounted) as it has a full planning permission and is currently being built.

18AL4 & WE6 (Land at Bridge Cottage & The Old Cottage and Ryefield Farm & Woodgate Centre, Oaktree Lane) – The Government guidance on Sequential assessments (see <https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants#information-about-alternative-sites>) states under “Potential Alternative Sites” that allocated sites should be included within the assessment. It therefore would not follow to include the site because it is allocated and then discount because it is allocated. However, there may be other reasons why they can be discounted such as ownership or deliverability and you should therefore provide such justification for excluding.

32 (Wings Nursery, Lidsey Road) – OK.

WE8 (Land north of Lees Yard, Lidsey Road) – As I was the case officer for the refusal on this site, I can advise that we would likely have recommended approval had the layout/design aspects been acceptable and had the applicant agreed to the transport mitigation measures which included a contribution to the A29 realignment scheme. However, the development of this site would not have depended upon the A29 realignment as it does not fall within the BEW area (it was just that contributions were required). It may therefore be better to discount on the grounds of site size, density/yield or ownership? You may also wish to note that we have just received a fresh application for this site (AL/21/20/OUT).

We also think you just need to make clear as to whether discussions have been had or not about the other sites and what these may have resulted in, as well as anything to do with ownership etc.

If you can make the above changes to strengthen your Sequential then I consider it likely that we will accept it.

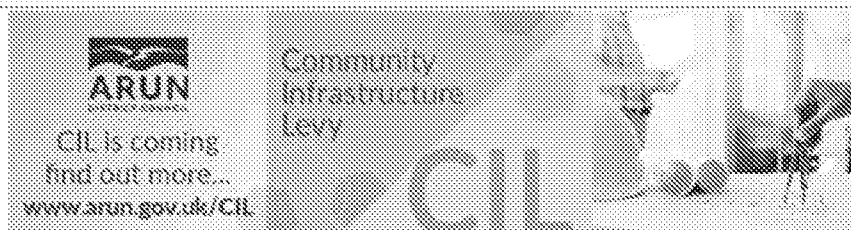
Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |

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Please note that I typically work from home on Thursdays when I am unreachable on my work phone



From: [REDACTED]
Sent: 28 February 2020 19:10
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Re: BE/109/19/OUT - Land East of Shripney Road

Simon,

Thanks for the below. I set out our response below but would happily speak on Monday to discuss this if we still aren't in agreement. There are other matters to discuss but I have kept this reply purely on the sequential test subject. I don't think there is much disagreement really, on my reading.

18FP1 - Land at Stanhorn Grove

Noted albeit the Sequential Test does also discount this site for a number of reasons, so we have reached the same conclusion.

18AL4 & WE6- Land at Bridge Cottage & The Old Cottage and Ryefield Farm & Woodgate Centre, Oaktree Lane

These are both the part of the Barnham / Eastergate / Westergate housing allocation and our justification for discounting them is further detailed in paragraph 3.6.1 (page 8) of the Sequential Test and not just reliant on the table. For ease I set this out below:

Policy H SP1: Housing Requirement provides details of strategic housing allocations which are necessary for meeting the Council's housing land requirement. Such sites are not by definition windfall sites and will not address the shortfall of housing land identified in Chapter 6.2.1: Housing Land Supply of the Planning Statement. All sites sitting within allocation SD5 Barnham / Eastergate / Westergate have therefore discounted as alternative locations for development.

Aside from the above, the delivery of the Strategic Land Allocation, and certainly most of the southern extent of it (e.g. land south of Barnham Road) would seem dependent on the A29 realignment. As such neither site can be concluded likely to be delivered prior to the progression of the aforementioned strategic infrastructure. I think though isn't this a moot point as the policy officer advises she can see they can be discounted for other reasons and as such we have reached the same conclusion?

32 – Wings Nursery, Lidsey Road

This site is discounted on the grounds it has permission through the planning process. The site is also discounted in the report in sub-chapter 5.2 (pg14) and as such we have reached the same conclusion.

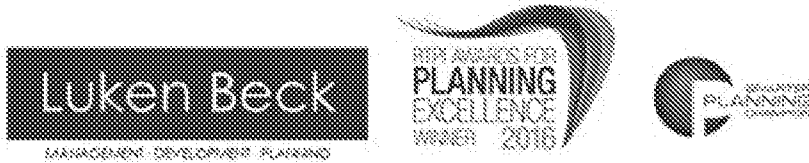
WE8 - Land north of Lees Yard, Lidsey Road

The rationale for discounting this site is detailed in sub-chapter 5.1 (page 14) of the Sequential Test report. This justification does not discount the site on the grounds of flood risk but rather details how the site is not deliverable by citing (1) the HELAA report, (2) the recent planning refusal and (3) the client's knowledge of the area.

Kind regards,

Luken Beck, 30 Carlton Crescent, Southampton SO15 2EW

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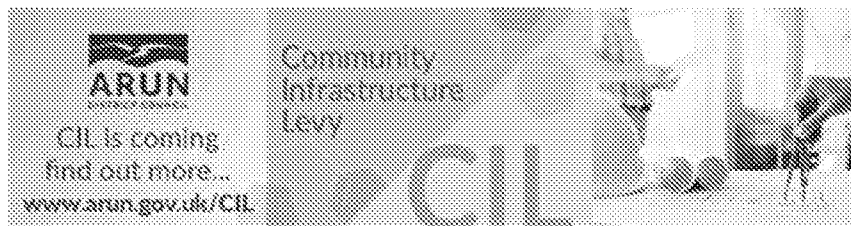
From: Simon Davis <simon.davis@arun.gov.uk>
Date: Monday, 24 February 2020 at 11:04
To: [REDACTED]
Subject: FW: BE/109/19/OUT - Land East of Shripney Road

Dear Nigel,

Please see below comments on the Sequential Assessment. Could you consider and respond to me please.

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |
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Please note that I typically work from home on Thursdays when I am unreachable on my work phone



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From: Charlotte Hardy
Sent: 24 February 2020 09:44
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: BE/109/19/OUT - Land East of Shripney Road

Hi Simon

I am afraid there are definitely some issues that remain with this from further looking. I am working on the basis that the absolute basic criteria is a site that is similar in size=1.8 ha (that of the ST @ Appendix D) and around 46 units. Oh and of course the fact that this is only outline

Hopefully it may just be the way it has been expressed but at para 3.3.3 of the FRA and 4.1.2 of Appendix D they list the points they have used to discount sites, of which I think the first is meant to be as below, as being on the basis of being allocated and so not reasonable

- ~~Not~~ have a policy designation for an alternative land use

Of the site assessment table:

1. 18FP1 – this has permission and through planning process so should have been excluded
2. I am unsure about 18AL4 and WE6, as although there are obvious differences in terms of site size and capacities they are allocated for housing (not alternate use) in ALP and from flood perspective lower risk. Have a read of Information about alternative sites on this [page](#). I could see they could be discounted for other reasons
3. I will accept that WE8 and 32 could be considered reasonable from flood perspective but 32 should have been excluded on the basis of the fact that this has permission through the planning process

Unfortunately cannot agree with their final conclusion that the sequential test has been passed purely as there are no other available sites on basis of the current information, as they have not really provided answer in terms of the two sites mentioned under 2 above. I suspect that this is really a planning issue

If need anything else then do come back.

Charlie