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## **PLANNING STATEMENT**

### **Land East of Heath Place, Bersted, PO22 9SL**

Full planning application to erect a 3 storey building comprising of undercroft car parking and bicycle store, 2no. floors of 4no. self-contained flats on each (8no. flats in total) with pedestrian access formed onto Ash Grove.

February 2026

## **INTRODUCTION**

- 1.1 This Planning Statement has been prepared to accompany the enclosed planning application for the erection of a detached block of 8no. flats with undercroft car parking, access and associated landscaping at Heath Place, Bognor Regis.
- 1.2 The purpose of this planning statement is to demonstrate that the proposed development is acceptable in all respects having been assessed against the relevant planning policies and other relevant planning guidance contained in the following:
- The National Planning Policy Framework (December 2024)
  - The Arun Local Plan 2011-2031 (adopted 2018)
  - The Bersted Neighbourhood Plan (made 2014)
  - Arun Parking Standards 2020
  - Open Spaces, Playing Pitches & Indoor & Built Sports Facilities (2020)
  - Arun District Design Guide Supplementary Planning Document (2024)
- 1.3 This application follows a refusal for a similar development under decision BE/143/25/OUT. In that decision dated 12<sup>th</sup> February 2026, all planning considerations were considered favourable however the planning application was refused on one single ground of,
- “The site is in Flood Zone 3a and the submitted Flood Risk Assessment does not demonstrate that the development will be safe for its lifetime without increasing risk elsewhere. Whilst the proposal site does pass the sequential assessment, no information has been put forward as to how the proposal passes the exceptions test. There is no certainty that the scheme will ensure future occupants are safe from flooding or that the development will not increase risk to surrounding residential properties. The application is therefore in conflict with Arun Local Plan Policy W DM2, the NPPF and the associated NPPG on Flood Risk and Coastal Change”.
- 1.4 The Flood Risk Assessment and Drainage Strategy prepared by Aegaea has been updated and now addresses that reason for refusal.

## **SITE CHARACTERISTICS AND CONTEXT**

- 2.1 The application site is an area of grassed landscaping adjacent to Heath Place, a four-storey office building located in the urban area of Bognor Regis. Heath Place forms part of an employment area that comprises various office, light industrial and storage and distribution businesses located to the north, east and south of the site. Notably, residential dwellings bound much of the western edge of the employment area as the land use transitions to residential in that direction.
- 2.2 The site is positioned between two roads; directly to the west is Ash Grove, which is a main arterial road that provides direct access to Bognor Regis town centre to the south. To the east is the internal access road for Heath Place that leads round past the site and into the parking area for staff who work in the adjacent commercial buildings.

- 2.3 The application site comprises mostly open grass with two small clusters of trees on the northern and southern boundaries, which are subject to a Tree Preservation Order. The site forms part of what would likely have been the original landscaping laid out as part of the Heath Place office development.
- 2.4 The character of the wider area is mixed between employment and residential uses. Directly opposite the site across Ash Grove are residential properties with a uniform style. These comprise a range of detached, semi-detached and terraced dwellings. Materials used for the immediately adjacent buildings include bricks, render, slate tiles and gable end pitched roof forms.



The application site as currently seen from within the office grounds



Typical housing development positioned opposite the application site

- 2.5 The site is in a highly sustainable location less than 2 miles mile from Bognor Regis town centre, which contains a range of shops and local service including a main line railway station. The site is well served by bus, walking and cycle routes into Bognor Regis. The closest bus routes are the 63 and 707, with bus stops approximately a 10-minute walk from the site providing direct access into the town centre.
- 2.6 The site is not subject to any other planning policy, heritage or environmental designations that would prohibit residential development as a matter of principle.

## THE PROPOSED DEVELOPMENT

- 3.1 The application proposes the erection of a three-storey detached building with 8no. flats, undercroft parking and associated landscaping.
- 3.2 The lower ground floor would comprise 8no. car parking spaces and cycle and bin storage. The undercroft parking design will ensure the lower ground (including parking area) is a subservient feature of the proposal, which has significant benefits in urban design terms. The undercroft parking will also have the benefit of embedding flood mitigation measures into the scheme as is explained in further detail in the accompanying FRA.
- 3.3 The 8no. flats (comprising 1-bed and 2-bed units) would then be laid out on the upper two floors of the building.
- 3.4 Access to the building will be from the internal access road for Heath Place, leading to a forecourt that leads into the undercroft parking area. The undercroft garaging will be cut into the embankment. Access to the flats would be on the western elevation facing Ash Grove.
- 3.5 Outdoor amenity space will be provided either side of the building enclosed by new planting and retention of the existing mature trees.



Proposed flatted development as seen from the service road



Proposed flatted development as seen from Ash Grove

- 3.6 Outdoor amenity space will be provided either side of the building enclosed by new planting and retention of the existing mature trees.
- 3.7 The design of the dwellings has been drawn directly from the traditional vernacular in the area and to replicate key features such as roof form and use of materials. This will ensure a high-quality development will be achieved as well as integrating respectfully with the prevailing character of the area.
- 3.8 Key design features include the building proposed to have a pitched roof with side gable ends to replicate the form of the residential properties directly opposite across Ash Grove. Materials will be different and more modern to assimilate with the character of the adjacent buildings in the employment area. These will include brick, slate roof tiles and anthracite windows and doors to give the building a fresh and modern appearance but in a way that will assimilate positively with its surrounds.

## **PLANNING POLICY ASSESSMENT**

- 4.1 This section sets out how the proposed development accords with the relevant development plan policies contained in the Arun District Local Plan 2011-2031 (adopted in 2018) (ALP) and the Bersted Neighbourhood Plan (made in 2014) (BNP). While the West Sussex Waste and Minerals Plans form part of the adopted development plan, they are not relevant to the assessment of the proposed development and not referred henceforth in this statement. Reference is also given to the Council's Supplementary Planning Documents where applicable.
- 4.2 A key material consideration is the Council's housing land supply deficit, which engages the NPPF's Paragraph 11 (d) presumption in favour of sustainable development to the consideration of this application. It is contended that the provision of 8no. new homes in this context should be given very significant weight and should enable the Council to grant planning permission without delay.

### **Principle of development**

- 4.3 The site is within the built-up area boundary (BUAB) as identified in the ALP. Policy SD SP2 of the ALP states that development should be focused within the built-up area boundaries and will be permitted, subject to consideration against other policies in the plan.
- 4.4 As has been identified, the application site is not subject to any specific policy designations in the Local Plan that would prohibit residential development in principle. Notwithstanding, it is acknowledged the site is part of an unallocated employment area subject to the provisions of Policy EMP DM1 of the ALP. This policy seeks to protect and enhance existing employment sites and premises where there remains a reasonable prospect of employment use. The application site forms part of an area of grass adjacent to the Heath Place access road. It was never intended to be safeguarded for further employment land. Nor has there been interest in bringing forward commercial development on the land upon review of the planning history at the site.
- 4.5 It is also material that the Council has already accepted the principle of residential development on the site in its assessment of the much larger proposal subject of Ref: BE/51/23/OUT. In that case the proposal would have resulted in the loss of 79no. car parking spaces associated with the Heath Place offices but still found to not be contrary to Policy EMP DM1. With no parking to be lost by the proposed development in this case, and the land not likely to ever be used for employment development it would have even less impact on the provision of employment land than the previous scheme that was found to be acceptable in principle. For these reasons, the proposal is contended to accord with the requirements of Policy EMP DM1.
- 4.6 Policy EE3 of the BNP states that the redevelopment or change of use of land or buildings in employment use will not be permitted unless the existing use can be shown to be no longer viable. The site is not in use for employment by reason of being undeveloped grassed verge. Its redevelopment for residential would, therefore, have no impact on the viability of the wider employment area that would remain unaffected

by the proposed development. The proposal, therefore, accords with the requirements of Policy EE3 of the BNP.

- 4.7 In terms of the provision of housing, Policy S SP1 of the ALP sets out at that at least 20,000 new homes will be accommodated within the district. This is to be delivered through a range of strategic sites with 3,200 homes of the requirement to be provided in the Greater Bognor Regis Urban Area.
- 4.8 Policy HDQ3 of the BNP supports proposals for small residential developments on infill and redevelopment sites. This proposal for 8no. homes is clearly a small residential development on a highly sustainable infill site in accordance with Policy HDQ3 of the BNP.
- 4.9 A significant material consideration in this case is the Council's housing land supply position. The Council published its most recent assessment of housing supply and delivery in its Annual Monitoring Report dated April 2025. This confirms the Council are only able to demonstrate 3.41 years of supply at the present time. In these circumstances, the NPPF's presumption in favour of sustainable development set out in Paragraph 11 (d) is engaged to the consideration of this application. Paragraph 11 (d) considers any existing development plan policy relating to housing supply to be out of date and requires that planning permission be approved without delay where the proposal accords with the NPPF policies.
- 4.10 The policies in NPPF actively support the principle of development. These include Section 5 that seeks to deliver a sufficient supply of homes that recognises the important contribution that small sites can make to meeting the housing requirement of an area, and Section 11 that promotes an effective use of land to meet the need for homes. The proposed design as is explained further in this statement is acceptable and would meet the requirements of Section 12 that seeks to achieve well-designed places.
- 4.11 To summarise, the application site is in a highly sustainable location for development that accords with the Council's locational development strategy set out in the ALP. It will have no adverse impacts on the continued viability of the adjacent employment area and will bring forward much needed new housing, which weighs heavily in favour of granting planning permission once the Council apply the NPPF's presumption in favour of sustainable development to the proposal. The proposal would deliver well-designed new homes on a small site and make effective use of land in accordance with the objectives of the NPPF. The proposed development is, therefore, acceptable in principle subject to assessment against other relevant development plan and NPPF policies.

### **Flood Risk**

- 4.12 I refer the reader to the Flood Risk Assessment and Drainage Strategy report prepared by Ageaea.

## **Design**

- 4.13 Policy D SP1 of the ALP states that all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.
- 4.14 Policy D DM1 sets out that the Council will have regard to character, appearance / attractiveness, impact (in terms of amenity of nearby properties), innovation, adaptability, crime prevention, trees and woodland, solar gain, public realm and art, layout, density, scale and form and design quality (which should comply with the Arun District Council Design Guide).
- 4.15 Policy D DM2 requires internal spaces to be an appropriate size with the Nationally Described Space Standards providing guidance in this regard.
- 4.16 Policy HDQ2 of the BNP requires that new housing must ensure that new homes are well connected to their surroundings. The development is assessed against these requirements as follows.

### Density

- 4.17 The 8no. unit flatted block will have a density that is characteristic of the pattern of development in the area. This also accords with the Design Guide SPD's guidance that stipulates that development should incorporate an appropriate density for its location.

### Layout

- 4.18 The application proposes to erect a detached building on a newly created plot on left over grassed verge land adjacent to Heath Place.
- 4.19 The building would be sensitively cut into the verge area and be laid out in a rectangular form slightly angled towards the adjacent access road. This would enable its layout and building's frontage to make best use of the site's orientation and how it would be seen from Ash Grove.
- 4.20 This layout also reflects the siting of the residential buildings opposite across Ash Grove that are angled towards the road. This is the most appropriate response to the local character of the site to ensure the proposed building will co-exist harmoniously and integrate within the street scene without appearing as incongruous or in any way out of keeping with the layout character of the area. This approach is supported by the guidance in the Arun Design Guide Supplementary Planning Document (2024), which requires development to be informed by a clear understanding of the site and wider setting.
- 4.21 Moreover, a key part of the design is the provision of the undercroft garaging for the cycle and car parking and bin storage. This will ensure these elements are contained within the fabric of the building and will not dominate the site layout.

- 4.22 To the side of the building would be proportionate space, open areas and retention of trees, which would enable the dwelling to be set within a spacious and verdant setting. This is to match the general pattern of residential development in the area where blocks of housing are set within areas of landscaping. This is the appropriate design response for site layout that is supported by the Council's Design Guide.

#### Internal Layout

- 4.23 Access to the building for residents will be from Ash Grove that leads into a central hallway and stairwell up a set of steps. This will provide internal access to four flats on each floor. The flats would all have kitchen, bathroom, living space. WC and bedrooms to provide a high-quality living environment for residents. The 1 bed flats meet the guidance for 1 person flats as set out in the Nationally Described Space Standards (NDSS). The two bedroom flats are slightly under the (NDSS) but not to a level where it could reasonably be found to adversely impact on future occupants living conditions. The undercroft garaging would provide car parking, cycle parking and bin storage all within the envelope of the building.

#### Landscaping

- 4.24 The external amenity areas will be largely retained as they are today with additional border planting added to maintain the verdant appearance of the site and how it would appear in the street scene. This approach makes best use of the site retained natural environment as is advised by the Council's Design SPD.

#### Architectural style, scale, bulk, height and materials

- 4.25 The proposed building would have a modern appearance and design detailing and vernacular to blend in with and respect the appearance of the nearby commercial buildings.
- 4.26 The design also includes key design features evident on the nearby residential blocks across Ash Grove such as height and roof form. This will ensure there is an appropriate transition between the commercial and residential that this site bridges. This accords with the guidance in the Design SPD, which states that new designs should respond to the frontages and facades of existing buildings.
- 4.27 In terms of height, the proposed building will be 3 storeys. This is a scale of development that respects the scale of adjacent buildings from the four storey Heath Place to the 2 storey residential blocks across Ash Grove. The roof form would be pitched with gabled ends, which matches similar roof styles used on the residential buildings nearby. The resultant effect will be a building that integrate successfully into the varied and interesting street scene in terms of the overall scale, height and roof form.

- 4.28 Regarding materials, the dwellings will comprise red facing brick, grey slate roof tiles and anthracite windowsills and doors. This is modern palette of materials that will help the design of the building to stand out positively and enhance the quality of design in the area.

#### Visual Impact

- 4.29 Visually there will be a change from how the site appears from an undeveloped section of grassed verge to one where a detached building would be visible from its immediate surrounds. The application site is, however, large enough to accommodate the proposed building comfortably without it appearing as an incongruous addition when considering the scale of development that surrounds the site.
- 4.30 Moreover, the spacing of the building correlates with the existing grain of nearby properties as well as overall position within the plot by being set back from the road. As discussed, landscaping will take the form of shrubs and bushes on the front boundaries to ensure the building is set within a verdant setting to mirror this key character feature of the area.
- 4.31 The design approach will, therefore, result in the building appearing as a well-designed and logical addition to make best use of land to deliver much needed new housing. As such, the visual impact will have no adverse impacts on the overall character and appearance of the area.

#### Relationship to nearby properties

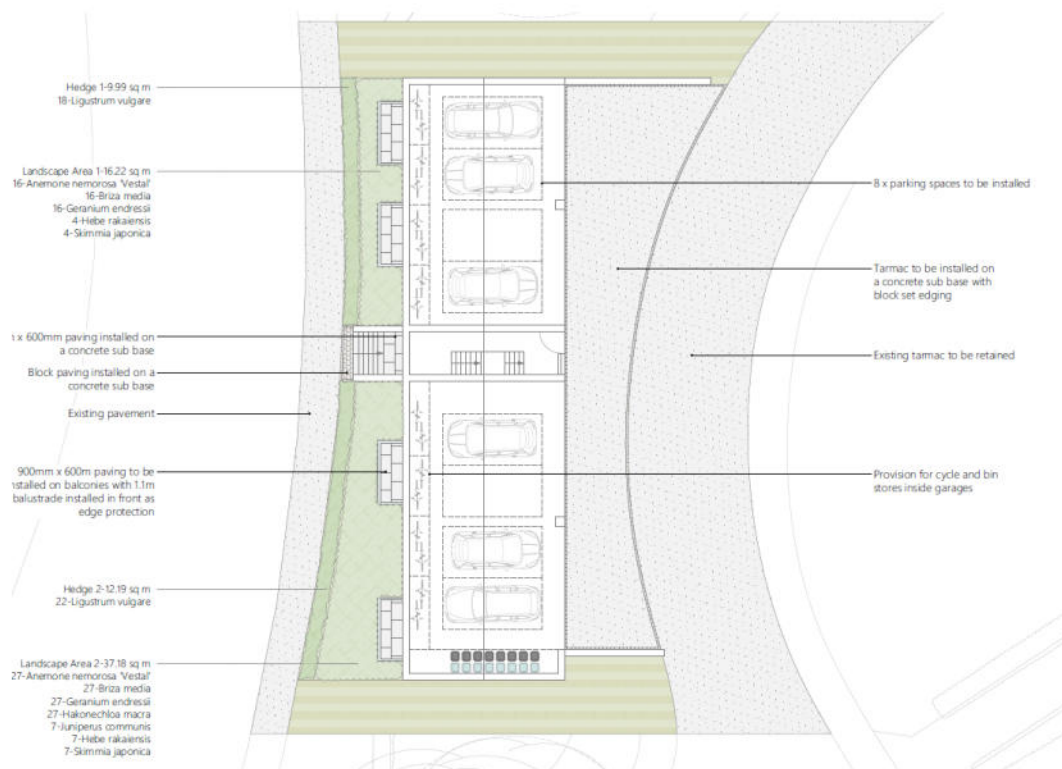
- 4.32 The building has been orientated in its plot to ensure there not be any adverse impacts on loss of light, privacy or outlook to any nearby property. The rear of the building would face towards Ash Grove but far enough away from the residential properties opposite to have any adverse impacts on privacy, daylight and overshadowing. For these reasons, the proposal has an acceptable relationship to nearby properties and would not result in any material harm or disturbance to their amenity.

#### Design Summary

- 4.33 As has been set out, the proposal has been carefully designed to respect the prevailing form and pattern of development of the immediately adjacent area. This will result in a development with a high standard of design that will integrate successfully within the character of the area. For the reasons stated, the proposal is acceptable in design terms and accords with Policies D SP1 and D DM1 and D DM2 of the ALP and Policy HDQ2 of the BNP and the guidance in the Council's SPD. The proposal would also accord with Paragraph 135 of the NPPF, which requires development to respect character and provide a high standard of amenity for existing and future residents.

## Landscape Character

- 4.34 Policy LAN DM1 is mainly focused on protecting the setting to the South Downs National Park, which is not relevant to the application site given its position within the built-up area of Arun. The policy also refers to development needing to respect the characteristics and natural features of the relevant character areas in the district.



Proposed landscaping of the site to meet BNG requirements

- 4.35 The Council has identified 17 character areas across its district, none of which cover the application site. As has been set out in the design section, the proposal would integrate with its immediate area without causing any material harm to its character or appearance. Accordingly, the proposed development is not identified to have any adverse impacts on the landscape areas protected by Policy LAN DM1 of the ALP.

## Trees

- 4.36 Policy ENV DM4 states that development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order (TPO) will not be damaged or destroyed unless development meets one of three prescribed criteria.
- 4.37 There is a TPO (TPO/BE/1/22) across the site that covers the two small clusters of trees either side of where the proposed building would be located. Given the proximity of the proposed building to protected trees, the application is supported by a detailed Arboricultural Impact Assessment (AIA), Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP).

- 4.38 These documents confirm that the proposed development would not result in any adverse impacts on the protected trees. Firstly, the development has been designed to be sited without requiring any trees to be lost or impacting on Root Protection Areas (RPA). In addition, various tree work mitigations including tree protective fencing are proposed within the AMS and TPP to further confirm the proposed development accords with the requirements of Policy ENV DM4 as well as the relevant British Standards and will not result in harm to protected trees.

### **Parking and Access**

- 4.39 Policy T SP1 of the ALP supports development which is designed to reduce the need to travel by car whilst making provision for safe access to the highway network. In this regard, access will be from Heath Place through a newly created front access into the site that would lead to the undercroft garaging that will provide both car and cycle parking.
- 4.40 The location for the access has been chosen to ensure there is sufficient visibility in both directions for cars and cycles to enter and leave the undercroft garaging safely and with the required sight lines. The access will also be suitable for servicing by bin lorries and emergency vehicles throughout. It is evident that the access is acceptable to serve the proposed development.
- 4.41 The policy requires development to incorporate appropriate levels of parking in line with the West Sussex County standards. The Council has since adopted its own Parking Standards Supplementary Parking Standards (2020), which has been based on the West Sussex County Standards.
- 4.42 The SPD and the country guidance require flats to be served by 1 cycle space, which is met in this case as shown on the layout plans. The parking spaces provided meet the Council's guidelines in the Design SPD of each space being at least 6 x 3m. However, the Council's SPD then requires 2 car parking spaces to be provided for each flat. The requirement for 2 spaces has been rounded up from the West Sussex County standards, which creates in the applicant's view an excessive parking requirement for the development that comprises only 1 and 2 bed units.
- 4.43 Furthermore, due to the site size and need to also mitigate for flood risk, it is not possible to increase the building's footprint to provide more parking spaces. Accordingly, 8 car parking spaces are proposed to ensure each flat has their own dedicated car parking space but to a level that will over dominate what is overall a small plot of land. When the sustainability of the location is considered with access to bus services, walking and cycle opportunities it is contended that the appropriate balance has been struck in car parking provision for the development even if there is a minor conflict with the Council's parking guidance.
- 4.44 The design of the parking also accords with the Council's Design Guidance SPD, which seeks to ensure development provides adequate car parking, carefully located to ensure it does not dominate. There is also sufficient room within the undercroft garaging for the electric vehicle charging points to be installed to meet with the Council's requirements set out in the Parking Standards and Design SPD.

- 4.45 Paragraph 116 of the NPPF validates this position by confirming that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or a severe impact on the road network. In view of the sustainability of the location and the suitability of the access, it is clear that the requirements of Paragraph 116 are met and transport matters are not a reason to prevent the proposed housing development.
- 4.46 In conclusion the access and vehicle and cycle parking provision are acceptable for the development when considering the site-specific circumstance and do not materially conflict with the requirements of Policy T SP1. Even if the Council had a contrary view, the proposal clearly accords with the requirements of Paragraph 116 of the NPPF, which would outweigh any conflict with the development plan on this issue given the urgent need for housing in the area and engaging of the Paragraph 11 (d) of the NPPF presumption in favour.

### **Waste Servicing**

- 4.47 Policy WM DM1 requires development to be designed to ensure that kerbside collection is possible for municipal waste and ensure communal bins for flats are available for residents of flats. The internal layout includes communal bin storage that will be readily accessible by residents. The communal bins will also be located adjacent to the access road that can allow for kerbside collection. The proposed development, therefore, accords with the requirements of Policy WM DM1.

### **Biodiversity**

- 4.48 Policy ENV DM5 of the ALP seeks to achieve a net gain in biodiversity and protect existing habitats on site. The application is accompanied by an Ecological Assessment that confirms there is no evidence that the development of the site will result in any harm to local species and biodiversity, which accords with the requirements of Policy ENV DM5. A Biodiversity Metric Calculation is also provided to set out how the proposal will provide the mandatory 10% BNG for the site.

### **Infrastructure Provision**

- 4.49 Policy OSR DM1 of the ALP requires housing to contribute towards open space, playing pitch and indoor sport and leisure facilities in accordance with the relevant council strategies.
- 4.50 It is acknowledged that to comply with this policy, the applicant will be required to make proportionate contributions to open space and other leisure-based infrastructure as required by the Council's Public Open Space, Playing Pitch and Built Facilities SPD (2020). The applicant confirms they will make the required migration payments in accordance with the Council's procedures, which will ensure the requirements of Policy OSR DM1 and the SPD are met in this respect.

### **Climate change and sustainable construction**

- 4.51 Policy ECC SP1 supports development which is located and appropriately designed to adapt to impacts arising from climate change such as increased probability of tidal and fluvial flooding, water stress, extreme temperatures and decline in habitats and biodiversity. As has been set out earlier in this statement, the proposal includes flood mitigation measures in its design and is supported by detailed biodiversity information to confirm compliance with the mandatory net gain requirements.
- 4.52 Policy ECC SP2 expects all new residential development to be energy efficient demonstrate how they will meet three prescribed criteria. In terms of (a), the building will be constructed to the required building regulations, which are more stringent now in terms of energy efficient buildings than when the plan was adopted in 2018. In terms of (b), the proposal has made best use of the site and positioned the building at a slight angle to make best use of its orientation for solar gain. (c) will be met through the incorporation of solar panels on the roof, which the applicant agrees to be secured by condition should the Council require it.
- 4.53 As has been demonstrated, the development will incorporate sustainable construction methods to help with addressing the causes and impacts of climate change in accordance with the requirements as set out in Policies ECC SP1 and ECC SP2 of the ALP.

### **Quality of Environment and Pollution**

- 4.54 Policies QE DM1, DM2, DM3 and DM4 seek to ensure all development contributes positively to the quality of the environment and not be susceptible to adverse noise, light, odour and air pollution. While the site is located adjacent to an employment area, the nearest use is office, which is readily compatible with residential development.
- 4.55 There are also existing residential properties on the perimeter of the employment area that co-exist with the uses within without any adverse impacts on the quality of the environment for either residents or workers. It also should be noted that no adverse impacts were identified in this respect in the previous, and much larger, proposed residential development of the site. As such, it is contended that the proposed residential use will be wholly compatible with its surrounded in environmental terms in accordance with Policies QE DM1, DM2, DM3 and DM4.

### **CONCLUSION**

- 5.1 The NPPF confirms the importance of making efficient use of land to meet development needs. The application site is in the defined urban area where the principle of development is supported by the development plan.
- 5.2 The proposal would also increase the choice, mix and supply of residential accommodation by providing 8no. new homes in a sustainable location where there is an identified unmet need.

- 5.3 The submitted scheme has been carefully designed to create a high-quality development that would respect the pattern and layout of development in the vicinity as well as local distinctiveness.
- 5.4 There would not be any harm to living conditions for neighbours or future occupants due to the size of the building, orientation in the plot and location of windows.
- 5.5 Safe and secure access can be provided without having any adverse impacts on highway safety. Cycle provision will be provided so that future residents can access the centre of Bognor Regis and its services sustainably alongside the access to bus and rail services
- 5.6 The site will not have any adverse impacts on ecology and biodiversity. Flood risk and drainage measures will ensure flood risk can be mitigated.
- 5.7 In conclusion, it has been demonstrated in this statement that the proposed development is acceptable when assessed against relevant adopted development plan policies as well as those in the NPPF and planning permission is respectfully requested to be granted.