
Land west of New Barn Lane, North Bersted

Planning Statement (including Affordable Housing Statement)
Alternative application

On Behalf of Linden Homes South

February 2019

Land west of New Barn Lane, North Bersted

Planning Statement

On behalf of Linden Homes South

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1.0 INTRODUCTION

1.1 Barton Willmore has been instructed by Linden Homes South to prepare and submit a Full Application for the erection of 99 dwellings on the land known as 'Land west of New Barn Lane'. This is an alternative application to that submitted under portal reference PP-07479668.

1.2 The site has a planning history, which is discussed in more detail within Section 2, with outline planning permission granted under Ref: BE/142/15/OUT for:

"Outline application with some matters reserved for a mix of up to 90 No. residential units, associated open space, landscaping, access & car parking. This application is a Departure from the Development Plan".

1.3 The above permission was subsequently amended under a Section 73 application to vary conditions 3 and 23 to allow for variation to the vehicular access. This was approved under Ref. BE/18/17/PL on 5 May 2017. An application for RMA was approved by the Council in December 2017 under reference BE/113/17/RES and pursuant to BE/18/17/PL. These permissions remain extant as development was commenced in mid-2018 and therefore are a material consideration in the determination of this application.

1.4 This full application seeks permission for the erection of 99 dwellings and associated works. The scheme follows the principles of the extant outline and Reserved Matters permissions on the site, including the permitted access under BE/18/17/PL.

Structure of Statement

1.5 **Chapter 2.0 (Planning Context)** of this statement sets out the relevant planning history to developing this site.

1.6 **Chapter 3.0 (Site Description and Surroundings)** discusses the physical characteristics of the site and its immediate surroundings.

1.7 **Chapter 4.0 (The Development Proposals)** provides a description of the development proposals.

- 1.8 **Chapter 5.0 (Planning Policy Framework)** summarises the relevant policies from the National Planning Policy Framework (NPPF) and provides a summary of the adopted local planning policies which any full application will fall to be considered by.
- 1.9 **Chapter 6.0 (Consultation)** sets out the consultation which was undertaken to inform the proposals.
- 1.10 **Chapter 7.0 (Assessment of Proposals)** provides details of the material submitted as part of this full application and includes commentary on how the proposals comply with adopted planning policy.
- 1.11 **Chapter 8.0 (Conclusion)** summarises that the application should be approved on the grounds that the proposals for the site accord with adopted Planning Policy.

- 2.1 Prior to the submission of the previous outline planning application, there was no relevant recent planning history pertaining to the site.
- 2.2 Following extensive engagement with the community, local authority and other interested parties, an outline planning application was submitted in September 2015. This was supported by a significant level of information to demonstrate how a high quality and distinctive place to live would be achieved which responded to the opportunities and characteristics of the area.
- 2.3 Outline planning permission was granted in February 2016. A subsequent application was submitted in February 2017 under Section 73 of the Town and Country Planning Act 1990 which sought to vary conditions 3 and 23 on the outline permission, with regard to the positioning of the vehicular access to the site (ref. BE/18/17/PL). This was granted permission on 5 May 2017.
- 2.4 The approved parameters for the outline permission are shown below.

[illegible]

- 2.5 A Reserved Matters application was submitted to the Council in September 2017 and approved in December 2017 under application reference BE/113/17/RES which incorporated a layout for 90 dwellings, together with requisite open and amenity space, affordable housing and sustainable drainage systems.
- 2.6 Whilst this application is not subject to the parameters of the outline permission, Linden Homes South are keen to ensure that this application would respect those parameters which have been previously consulted on and approved, including the single storey building heights area adjacent to New Barn Lane.
- 2.7 Two applications were submitted to the Council in July 2018; a 10 unit full application and a 90 unit Reserved Matters application. The Reserved Matters was later found to be invalid. However, of relevance to this application are the consultee responses received with regard to the cumulative proposal for 100 units on the site. Overall, there were no objections from statutory technical consultees and the principle of additional units was overall discussed positively with the Council. The application material has addressed any comments raised by the consultees during that application process, and provided clarification where necessary.

3.0 SITE DESCRIPTION AND SURROUNDINGS

- 3.1 North Bersted is located to the north of Bognor Regis, and is suburban in character, comprising predominantly 1950s and 1960s dwellings of one and two storeys with some local services and facilities, including a primary and secondary school.
- 3.2 The Site is located to the west of New Barn Lane, and is within the settlement boundary. The site area subject to this application comprises 3.71 ha and is generally flat and broadly rectangular in shape.
- 3.3 The approved outline and Reserved Matters consent has been commenced on site, and therefore the access and buildings towards the south of the site are in the ground. There are existing residential dwellings to the east and the Orchard Caravan Park to the north. To the south of the site is a public footpath (no. 134) that continues to the open fields to the west and links the site to Chichester Road, via Brazzwick Avenue, to the east. Beyond the public footpath, to the south, there is a community centre with associated playing fields, known as the Jubilee Recreation Ground, as well as a recently approved outline application for 50 units under application reference BE/77/16/OUT.
- 3.4 The site is located within walking distance of local services, including The Regis Secondary School and Southway Primary School.
- 3.5 The applicant, Linden Homes South, have commenced development of the site under the approved Reserved Matters layout, and the area which has been commenced under the Reserved Matters layout is the same as that proposed under this application. The intention would be for Linden Homes South to build out the remainder of the scheme in accordance with the layout proposed under this application, once permitted.

4.0 THE DEVELOPMENT PROPOSALS

- 4.1 This application seeks full planning permission for the erection of 99 dwellings, including open space, access and associated works.
- 4.2 The application submitted is an alternative to that submitted under PP-07479668. The differences relate to the layout along the northern boundary of the site.
- 4.3 Of the 99 units proposed, 30% would be affordable, in line with the relevant policy requirements as set out further in Section 5 below. Technical reports have been commissioned to support this application which demonstrate that the provision of open space and drainage infrastructure, together with surrounding highway capacity, would be able to satisfactorily accommodate the 99 units on the site.
- 4.4 Overall, this application includes the following key components, which are discussed in further detail in the Assessment of Proposals chapter of this statement:
- 99 dwellings (comprising a mix of 1, 2, 3 and 4 bed dwellings in the form of flats, bungalows and houses)
 - 30 affordable homes (30%) with a mix of shared ownership and affordable rent tenure
 - Density of 26.8 dwellings per hectare (low density)
 - Overall compliance with the parameter plans approved under the previous outline permission with regard to land use and building heights on the site.
 - New vehicular access from New Barn Lane, the same as previously approved under BE/18/17/PL
 - Internal access route the same as the approved Reserved Matters (BE/113/17/RES)
 - Provision of 226 car parking spaces (191 allocated and 35 unallocated/visitor spaces), which exceeds the parking requirements of the WSCC Parking Calculator.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 recognises that where the development plan contains relevant policies, applications for development which are in accordance with the plans should be allowed unless material considerations indicate otherwise.

Local Planning Policy Context

- 5.2 The development plan consists of the Arun Local Plan 2018, West Sussex Joint Waste and Minerals Plans, and Bersted Neighbourhood Plan 2014.
- 5.3 The table below provides a summary of the policies that are of most relevance to this proposal with regard to the adopted plans, and a brief outline of how the application accords with them. More details on the specific aspects of the application can be found in Section 8 of this statement, the Design and Access Statement and other supporting plans and documents submitted alongside the application.
- 5.4 As per the NPPF 2018, paragraph 30, where there is conflict between the Local Plan and the Neighbourhood Plan, the most recently adopted Plan would take precedence. In this case, the Local Plan 2018 would therefore be the most up to date development plan policy where there is conflict between the two.
- 5.5 In this regard, the Local Plan 2018 extended the built up area boundary to include this site and the neighbouring allocation SD3; the Local Plan 2018 further removed these sites from the 'Gap between Settlements'. The amended boundaries as per the Local Plan 2018 policies map therefore supersedes that included within the Appendices to the Neighbourhood Plan.

Policy	Requirements	Application compliance
General SD SP2, SD SP3, H SP1	The Local Plan seeks to provide 20,000 new homes in the District across the Plan period of 2011-2031.	The site is located within the BUAB of Bersted as per the Local Plan 2018 and updated policies map, and therefore development in this location is in compliance with the Spatial Strategy of the Local Plan 2018. As set out above, the BUAB set out in the Neighbourhood Plan is superseded by the more up to date Local Plan 2018.
E57	Development should be focused within the Built Up Area Boundaries (BUAB), and will be permitted subject to consideration against	

	other policies in the Plan.	The site has extant permission for 90 units. The additional 9 units on the site would make a small contribution to the Council's housing delivery and supply.
Housing type, tenure and mix H DM1 HDQ4	Seek a mix and range of dwelling types, sizes and tenures, to include affordable housing based on up to date SHMA recommendations. Proportion required to meet lifetime home standards and need to demonstrate meets the needs of current and future households.	The proposed development would include a mix of 1, 2, 3 and 4 bed units, including flats and bungalows, and 30% affordable housing. Therefore, it would provide for a range of occupants and encourage an inclusive and mixed community. 10 units have been designed to accommodate persons with disabilities, including wheelchair requirements.
Affordable Housing AH SP2	Requires the provision of 30% affordable housing to be delivered in small clusters and sets out the required mix (as a range).	The proposed development includes 30% affordable housing, including a tenure split of approximately 50:50, as per the previous requirements for this site under the extant outline permission. The affordable units generally meet the HCA design standards and the mix accords broadly with that set out in Policy AH SP2, whilst reflecting the approved affordable housing mix required on this site under the extant outline permission. The Affordable Housing Statement is incorporated into Section 7 of this statement.
Health and Wellbeing HWB SP1	Development to maximise impact on promoting healthy communities by providing necessary infrastructure to encourage exercise and health,	The site includes a large area of open space, together with links to public footpaths to connect into the wider countryside, which would encourage

	reduce need to travel by providing housing, services and employment in close proximity to each other, and ensuring arts and cultural facilities are accessible to all.	outdoor recreation. This includes provision of a LEAP and LAP on the site to encourage children's outdoor play. The site is located near to the facilities of Bersted and on a bus route into Bognor Regis where residents can access cultural facilities, employment and services.
Provision of open space OSR DM1 HDQ6	Provision of open space in accordance with guidance in the Open Space Study, and playing pitches in accordance with Playing Pitch strategy. Private outdoor garden amenity space, or shared amenity area must be provided for all new dwellings.	The site would provide sufficient open space to meet the requirements of Open Space Study, and would provide LEAP and LAPs for children's outdoor play. All dwellings include private or shared communal space.
Landscape LAN DM1	Development should respect the particular characteristics and natural features of the relevant landscape character areas, and seek to reinforce those character areas.	The landscape and relationship of the development to both the surrounding countryside and settlement, has been considered in detail to ensure that the development shall integrate into the existing urban form whilst respecting and enhancing the character of the landscape.
Archaeology HER DM6		The proposal has been supported by an Archaeological Written Scheme of Investigation that has been previously approved by the Council under condition 4 of the extant outline permission on the site.
Tree protection ENV DM4	Development will be permitted where it can be demonstrated that trees of amenity value will not be damaged or destroyed.	The submitted tree survey, AIA and tree protection plan demonstrates that the proposed development, including all drainage and associated works, would not impact on the trees to be retained

ES6	Proper provision must be made for the protection and management of trees or areas of woodland onsite, including provision of a management plan to ensure trees are adequately protected during development. Developments should be accompanied by a Tree Survey and a management plan to demonstrate how the trees will be maintained.	on the site.
Biodiversity ENV SP1 ENV DM2 ENV DM5	Where possible will promote the creation of new areas for habitats and species. Within Zone B of Pagham Harbour, development is required to make contribution to the agreed strategic approach and create easily accessible new green spaces for recreation. Development shall seek to achieve a net gain in biodiversity and undertake detailed survey where there is evidence of protected species on site.	This proposal includes a Biodiversity Checklist, Ecology Survey and Ecological Enhancement Scheme which demonstrate that there would be no harm to protected species. This was agreed under the previous outline and reserved matters consents, as well as condition 15 of permission BE/18/17/PL. The applicant is aware and willing to contribute towards the Strategic Approach and an area of open space has been provided on site for dog walking, including connections to neighbouring public rights of way that would encourage local walking. The application is supported by a report to support any Appropriate Assessment for this application.
Sustainable Construction ECC SP2 W SP1 W DM1	New residential development to be energy efficient and demonstrate how meet current standards for energy efficiency, with 10% of total predicted energy requirements from renewable or low carbon energy	The proposals address energy efficiency at a number of levels. Details of the energy efficiency initiatives which are to be integrated into the overall scheme can be found in the accompanying Energy Statement.

ES8	generation on site. Where energy generating infrastructure is proposed it should be located as close as practicable and in proportion to the buildings, and the impact on the landscape, views and wildlife should be minimized and not compromise public safety. Adjoining uses should not be adversely impacted. Council supports development which is appropriately located and incorporates SuDS that reduce the creation and flow of surface water. Development must include measures to meet the optional standards of 110 litres/person/day.	
Flood Risk, Surface water and foul water drainage W DM2, W DM3 ES2	Developments at risk of flooding will only be permitted where specific criteria have been satisfied. A Flood Risk Assessment must be submitted, and development should aim to reduce the overall level of flood risk in the area through SuDS to ensure flood risk is not increased. All developments must satisfy opportunities for SuDS which must be integrated into the overall design of the development.	A Flood Risk Assessment has been submitted with this application, together with a detailed drainage strategy that has taken account of climate change and incorporates Sustainable Drainage Systems. It is demonstrated within the attached documentation that the strategy can accommodate 99 units on this site. The approach taken has been approved by the Council under the original outline application on the site (Condition 5 of BE/17/18/PL)
Pollution and contamination QE DM2 QE DM3	Proposals with outdoor lighting must be accompanied by a lighting scheme and will be considered against whether there would be an adverse impact on neighbouring	A lighting strategy has been submitted with this application which sets out the type, height and luminosity of the lighting throughout the development. This demonstrates that it would not

QE DM4	uses and landscape, minimizing glare and spillage, light levels being a minimum required for security, and degree to which it can be powered by on site renewable sources. Proposals to assess likely impacts on air quality and mitigate effects by ensuring development is within easy reach of established public transport services; maximise cycling and pedestrian facilities. Require evidence to show unacceptable risk from contamination will be successfully addressed through remediation.	impact on wildlife corridors. The principles of the lighting strategy has been previously been permitted under in relation to the outline permission BE/18/17/PL and is not materially different to that previously permitted and extant. The proposal provides outdoor open space and links to neighbouring public rights of way to encourage cycling. Public transport is within proximity of the site for future residents and a Travel Plan is submitted which provides measures to encourage use of public transport and cycling. A Land Contamination Assessment demonstrates that there is no contamination on the site and the site has been considered acceptable for residential development previously.
Green Infrastructure GI SP1	Major development to protect and enhance the existing Green Infrastructure assets.	The proposed development will maintain the existing green infrastructure assets, primarily relating to the existing boundary vegetation. Additional planting will be provided throughout the development to enhance the green infrastructure assets on the site.
Design S SP1, D DM1, D DM2, ECC SP1 ES1, ES5,	Seek to make efficient use of land, but reflect the character of the site and local area. New homes must be well connected to the surrounding area and visually integrated. Sets out that the Council will have	The proposed design, appearance and layout has been informed by the character of North Bersted and proposes traditional house forms, with a varied material choice to ensure that it will integrate with its surroundings.

HDQ2, HDQ5, HDQ7	regard to a range of issues in order to ensure developments are of a high quality. The development should contribute to the local character by creating a sense of place appropriate to its location and items such as bin stores, cycle stores, lighting, gutters and others must be considered early in the design process. Requires that internal spaces meet the requirements of all occupiers, with the nationally described space standards providing guidance. Development must take into account climate change, including water efficiency, shade, cooling and solar gain, capacity of drainage systems. Building design should contribute positively to the historic character.	The style of dwellings remains the same as that accepted under the Reserved Matters application granted on the site. As such, the design, style and types of homes have already been accepted on this site. The layout promotes natural surveillance over public open space and the street network, which will create a safer environment. The proposed development makes greater efficient use of the land, through the additional of 9 units which better meet the local housing need as dictated by the local market, whilst also maintaining the character and visually integrating into the surrounding area.
Transport and movement T SP1, T DM1 GA1, GA3, HDQ8	Supports development that reduces the need to travel by car, incorporates appropriate levels of parking and is supported by an effective and deliverable Transport Assessment. New development must ensure ease of movement, prioritise safe pedestrian and cycle access and access to public transport. New development must also make provision for cycling and pedestrian facilities.	A transport assessment and Travel Plan have been submitted in support of this application which promote use of public transport, walking and cycling. The Transport Assessment demonstrates that the surrounding highway network can accommodate the 99 units on the site. The Transport Assessment and Travel Plan have previously been approved under the Reserved Matters permission BE/113/17/RES and Condition 28 in BE/18/17/PL. Parking has been provided in accordance with West Sussex County Council's Parking Calculator and meets

		the requirements of the Neighbourhood Plan (2 parking spaces per dwelling)
Infrastructure INF SP1	Support development which contributes towards infrastructure and services needed to support the development and meet needs of the occupiers and users of the development.	A draft Heads of Terms has been submitted with this application, and Linden Homes South are willing to discuss relevant infrastructure contributions for this site which meet the tests of Regulation 122 under the CIL Regulations 2010. The Council's CIL Preliminary Draft charging schedule is currently subject to consultation. It is envisaged that given the timeframes for this application, and the early stage of preparation of the CIL charging schedule, it will not be adopted at the time of determination of this application. Therefore, it is not envisaged that the CIL charging schedule will apply to any permission under this application.

Material considerations

- 5.6 The NPPF 2018 was published in July 2018 and is a material consideration in the determination of planning applications. The NPPF sets out that at the heart of the Framework is a presumption in favour of sustainable development which under paragraph 11 states that development proposals that accord with an up to date plan should be approved without delay.
- 5.7 Paragraph 17 reiterates that "Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise."

- 5.8 As will be demonstrated in the following section, the proposed development is fully in accordance with the adopted Development Plan and therefore should be approved without delay. Furthermore, we have sought to provide sufficient information in order to negate the requirement for any pre-commencement conditions, which will allow the scheme to be commenced at the earliest opportunity, thereby contributing to the Council's Housing Land Supply, of which 90 units are included within the Council's housing trajectory.
- 5.9 Other material considerations to this application include the extant permission for 90 units on this site, under permission reference BE/18/17/PL, pursuant to which a Reserved Matters application was approved in December 2017. This development has commenced on site and therefore remains extant in perpetuity and is a material consideration to this application.
- 5.10 The proposed development maintains the same access as that previously approved under BE/18/17/PL and reflects the previously approved parameters under that application with regard to green space and building heights. The internal road network also remains the broadly the same as previously approved. The main difference relates to the quantum and mix of housing on the site which has been amended to take account of market demand for a greater number of small units. This is discussed further below under Section 7.
- 5.11 Other material considerations, which are discussed within the Assessment of Proposals section below, includes the following Supplementary Planning Documents:
- Open Space and Recreation Standards
 - WSCC Parking Standards

6.0 CONSULTATION

6.1 The programme of community engagement for the preparation and design of the proposals at Land west of New Barn Lane has, from the outset, been designed to not only reflect the latest guidelines but also best practice in terms of the policies set out in the Localism Bill and the National Planning Policy Framework ('the Framework').

6.2 The Localism Bill was introduced to Parliament on the 13th December 2010, and was given Royal Ascent on the 15th November 2011, becoming an Act and enshrining the need to consult into law.

6.3 The Framework was published by the Government in July 2018. It forms a key part of the Government's reform of the planning system. It states that good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community. Particular regard has been had to paragraph 39 of the Framework, which states that:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community"

6.4 Arun District Council adopted their Statement of Community Involvement (SCI) in April 2012. A revised SCI was consulted on in July 2018, but has not yet been adopted. In relation to major development proposals, the Council's SCI encourages engagement with interested parties, stakeholders and communities as early as possible in order to add value to the process and the outcomes. Examples of how to engage are given, and range from public meetings, public exhibitions, workshops and the meeting with the town and parish councils to mail drops, neighbour notifications and use of websites.

6.5 The sub headings below set out the wider consultation that has been undertaken on this site for the various stages of application. These are relevant to this application as they have all informed the proposal set out within this application.

Community engagement for previous outline planning application

- 6.6 The Planning Statement submitted with the outline planning application detailed the considerable public consultation exercises undertaken between the applicant and the community, Parish Council and local planning authority.
- 6.7 Formal events held included a meeting with Bersted Parish Council in July 2015 and a public exhibition/ Question and Answer Session in September 2015 and allowed for the consultant team to answer any questions from residents and explain the detailed pre-application proposals. Furthermore, a consultation flyer was prepared and circulated to residents living in the North Bersted area.
- 6.8 Following the consultation exercises, a design response was prepared and included within the Design and Access Statement to show how the issues and comments raised had been addressed. The Transport Assessment, Flood Risk Assessment and Foul Water Strategy were also updated to reflect on the comments raised.
- 6.9 The success of the community engagement at that time was demonstrated by the granting of outline planning application.

Original Reserved Matters engagement

- 6.10 A range of community consultation was undertaken for the first Reserved Matters (BE/113/17/RES), which included a drop-in event for the local community and stakeholders, a meeting with Bersted Parish Council, a newsletter invitation to the drop-in event and pre- paid reply card for those who could not attend the event, a website and an information line and consultation email address.
- 6.11 A Statement of Community Involvement (SCI) was produced to support that application which detailed the community consultation undertaken with relation to this Reserved Matters Application. It further provided a detailed breakdown of feedback received from the above consultation methods, including the comments received.
- 6.12 The comments and issues raised from the consultation exercises were incorporated into the scheme, where relevant, although it is noted that a large number of comments were received on matters that were addressed at outline stage such as traffic, flooding and access.

Subsequent community consultation

- 6.13 Since the approval of the first Reserved Matters on this site, Linden Homes South have engaged with the Parish Council in order to discuss the proposed changes to the layout which are sought under this application, and why this is being sought. The revised layout continues to take on board the comments made during the previous consultation events. The Parish were understanding of the need for smaller homes and the revised strategy and were appreciative of the continued engagement.
- 6.14 Linden Homes have further engaged with the Local Planning Authority prior to the submission of the second Reserved Matters on the site and the full application for 10 units. With regard to the additional units on the site, the Council raised no overall concern with regard to the proposal but advised that the technical information would need to demonstrate that there is sufficient capacity to accommodate the additional units on the site. As discussed in Section 7, and the technical reports, we can confirm that there is capacity in technical terms for an additional 10 units on the site when compared to the approved 90-unit extant consent.
- 6.15 This application remains generally the same in terms of overall layout as that discussed with the Council at the pre-application stage and during the course of the determination period for the second Reserved Matters application. Any amendments relate to the parking layout, which was discussed with the Council and in principle considered acceptable though never formally submitted.

7.0 ASSESSMENT OF PROPOSALS

Principle of Development

- 7.1 The site lies within the settlement boundary defined on the Local Plan 2018 proposals map and development on this site accords with Policy SD SP2 of the Local Plan 2018 which seeks to focus development within the Built Up Area Boundaries (BUAB), and states that development will be permitted subject to consideration against other policies in the Plan.
- 7.2 It is noted that the proposals map within the Neighbourhood Plan has a different Built Up Area Boundary to the Local Plan 2018, and this is because it precedes the adoption of the Local Plan. Therefore, as per paragraph 30 of the NPPF 2018, the Local Plan policy supersedes the Neighbourhood Plan in this context.
- 7.3 It is also material that the principle of the development of the application site has been established through the granting of outline planning permission. The outline and Reserved Matters permissions discussed within Section 2 (Planning Context) are extant, and therefore a material planning consideration to the determination of this application.
- 7.4 A Reserved Matters application has been granted approval on this site (ref. BE/113/17/RES), which has established the principles of:
- Appearance and scale of homes
 - Proposed internal road layout
 - Sustainable Drainage System detailed size and design
 - Landscaping strategy
- 7.5 These matters are relevant to the determination of this application, as the proposed layout, scale and design of the dwellings remain generally as approved and extant on the site.
- 7.6 We demonstrate within the sections set out below that the proposed development would provide benefit to the community and surrounding area through a modest contribution to housing supply and provision of a high quality development that would accord with the Development Plan policies.

Housing Mix, including Affordable Housing

- 7.7 Policy H DM1 seeks developments to provide a mix of dwelling types and sizes, including affordable housing that adhere to the latest Homes and Communities Agency design guidance. The policy further seeks a balanced mix of market and affordable dwelling sizes, including family accommodation, based on the up to date SHMA.
- 7.8 Whilst the Policy wording relates to the SHMA, the latest SHMA to be published at Arun is the Coastal West Sussex SHMA Update in 2012. Since this time, a Housing Needs Assessment (2016) was published to form part of the evidence base for the Arun Local Plan 2018. This therefore forms Arun's most up to date evidence with regard to housing need and mix.
- 7.9 The table below sets out the proposed market and affordable mix on this site, against the recommendations.

Unit size	Proposed Market mix	Proposed Affordable Mix
1 bed	0 (0%)	6 (20%)
2 bed	22 (32%)	16 (53%)
3 bed	38 (55%)	8 (27%)
4 bed	9 (13%)	0 (0%)

- 7.10 With regard to market units, the Housing Needs Assessment 2016 sets out a particular need for 2 and 3 bed market units in Arun. The proposed market mix would accord with this requirement through the majority provision of 2 and 3 bed units on this site.
- 7.11 The extant scheme on this site is a material consideration. The mix proposed under the Reserved Matters consent on the site was accepted by the Council, which had a higher proportion of large units on the site. The proposed mix would contribute a greater number of smaller market units on the site than the extant permission, which aligns more closely to the aspirations of the Housing Needs Assessment 2016. The additional small units proposed on the site, in comparison to the extant Reserved Matters consent, is a result of market research which Linden Homes South have undertaken, which demonstrates a need for smaller units locally.
- 7.12 In relation to affordable housing, Policy AH SP3 requires the provision of 30% affordable housing to be delivered in small clusters and sets out a preferred mix of affordable housing to be delivered on a site.

- 7.13 The Affordable Mix aligns with the extant consent on the site, which sought approximately 50% affordable rented and 50% intermediate units on the site. These units have been clustered across the site. Some of the clusters have been deliberately located in prominent positions so as not to hide them away. The clustering also assists with the management of the various tenure types of affordable dwellings.
- 7.14 As discussed within the accompanying Design and Access Statement, the layout and appearance, of the scheme has been designed so as to ensure a tenure blind development. This has been carried through to the design and quality of the affordable housing units within the development, which would not be easily distinguishable from the market housing units.
- 7.15 In order to ensure inclusivity within the site, the proposed development includes 10 units which are specifically adapted to support wheelchair users. Wheelchair parking spaces have also been provided in close proximity to these units.
- 7.16 Overall, the proposed mix of market and affordable housing would be in broad accordance with the Housing Needs Assessment 2016, with the majority of units provided as 2 or 3 bed to provide for the identified need.

Layout and design

- 7.17 Details and rationale of the detailed design and layout are discussed in the Design and Access Statement which accompanies this application. The principles used follow the principles established within the extant outline and reserved matters applications.
- 7.18 Whilst this application is not tied to the parameter plans set out under the outline permission on the site, the proposed layout has sought to adhere to them. As such, the proposed development area is retained within the 'residential' zone on the Land Use Parameter plan agreed at outline stage. The access route follows that approved under Reserved Matters application BE/113/17/RES, with the single access to the south east of the site. The layout includes a perimeter block structure as the basis of the urban form, promoting natural surveillance and crime prevention on the adjacent public realm and streetscene.
- 7.19 The street network would be pedestrian oriented, with pedestrian paths, dropped kerbs and tactile paving at appropriate crossing points on the primary road, and shared surfaces in certain locations for pedestrian priority. The site is connected to the surrounding area through connections to the footpath to the south.

- 7.20 As per the Building Heights parameter plan on the outline permission for the site, the development consists of bungalows and two storey dwellings, with the bungalows located to the east of the site. The two storey dwellings are located outside of the single storey zone on the outline parameter plans, and therefore the development would continue to respect the character of the surrounding area. It is a material consideration that the heights have been approved previously under extant Reserved Matters application BE/113/17/RES.
- 7.21 Overall, the proposed layout would provide a key frontage facing New Barn Lane with an area of open space on the eastern boundary, with a variety of street types that reflect their primary or secondary nature. The design and layout would create a distinct urban form which responds positively to the character and appearance of the area and creates a strong sense of place.
- 7.22 The external appearance of the development is discussed in detail within the accompanying Design and Access Statement, and an external materials schedule is submitted to support this application. The proposed appearance, style and design of the dwellings remains as approved under the extant Reserved Matters application, and therefore have been considered acceptable. The proposed appearance demonstrates the context analysis which has been undertaken of the local area, identifying local vernacular and those aspects which have been carried forward to influence the external design of the dwellings.
- 7.23 The proposals include the use of various design features, materials and architectural elements to create design interest within the development as a whole. These principles have been previously agreed under the original Reserved Matters permission and remain unchanged under this application. Therefore, they have been considered acceptable.
- 7.24 As such, the proposed design, appearance, scale and layout are in accordance with Policies D SP1 and D DM1 of the Local Plan 2018.

Residential amenity

- 7.25 Policy D DM1 seeks that developments have minimal impact on users and occupiers of nearby property and land.

- 7.26 Full and detailed consideration has been given to the potential impact of the proposed development on the amenity of the existing occupants of adjoining properties, with the positioning of dwellings and the internal arrangements seeking to minimise any potential for detrimental overlooking or overshadowing. A full analysis of the relationship of the proposed development with existing neighbouring amenity is contained in the accompanying Design and Access Statement.
- 7.27 Similarly, the development has been designed to ensure that good standards of amenity are provided for future occupants. Relationships between dwellings have been carefully considered to provide high quality private amenity space which is not unacceptable overlooked or overshadowed. Generous proportions of public open space will be provided, and the public realm has been designed to ensure good natural surveillance and safe environments for people to walk, cycle and play.
- 7.28 As such, the proposal is in accordance with D DM1 of the Local Plan 2018.

Landscape and Arboriculture

- 7.29 The landscape proposals are considered to be of fundamental importance in creating the appropriate setting for the proposed development and its integration into the existing urban form. The strategy relating to the landscape proposals is set out in detail in the accompanying Design and Access Statement and accompanying landscape plans and documents.
- 7.30 The landscaping strategy seeks to maintain a naturalistic character to the site's boundaries, having due regard to the relationship between the development and New Barn Lane to the east, the adjacent footpath to the south, the open land to the west and the caravan park to the north. The landscape strategy seeks to include the retention of the tree line along the northern and eastern boundary, and a linear landscaped buffer along the western boundary.
- 7.31 Throughout the site, street trees, hedging and grass areas would create an attractive, green development that would integrate with the site's rural surroundings to the west.
- 7.32 A Soft Landscape Management and Maintenance Plan has been submitted to support this application which fully details who is responsible for the maintenance and management of the landscaped areas, the required works to be undertaken by the responsible party, and at what frequency this should be done.

- 7.33 Policy ENV DM4 of the Local Plan 2018 relates to the protection of trees which have been designated as TPOs, are identified as Ancient Woodland or in a Conservation Area. The proposed development site does not include any of these protected tree features, and therefore would comply with this policy.
- 7.34 Nevertheless, an Arboricultural Impact Assessment/ Method Statement and a Tree Report have been submitted in support of this application which identify the tree constraints on the site and the proposed methodology for the trees identified for removal, retention or planting on the Tree Protection Plan. This will ensure that any trees for retention are protected and trees to be planted have the best opportunity to survive and mature.
- 7.35 Overall, the development proposal has taken great consideration of landscaping, to ensure that it creates a high quality development. The site subject to this application has followed the principles agreed under the extant Reserved Matters application in order that the cumulative effect of the landscaping would be to create an attractive development for future residents that integrates with its surroundings and encourages biodiversity enhancement.
- 7.36 It is relevant that the broad landscaping strategy has previously been considered acceptable under the original Reserved Matters application and approved under Condition 9 of BE/18/17/PL.

Open space and amenity space

- 7.37 Policy OSR DM1 of the Local Plan sets out that open space should be provided in accordance with the guidance set out within the current Open Space Study and any open space should meet the quality standards set out in that document. The Open Space Study 2016 requires 24sqm of open space per person in West Arun.
- 7.38 Consequently, with 2.2 persons per dwelling, approximately 0.5ha of open space is required on the site as per the standards contained within the Open Space Study 2016. The quantum of open space proposed exceeds this standard, providing 0.69ha of public open space and 0.23 ha of other green space, such as retained vegetation buffers on the western, northern and southern boundaries.
- 7.39 It is evident that there is sufficient open space within the site to accommodate the 99 units proposed under this application.

- 7.40 Within the open space area proposed, there are a total of two Local Areas of Play (LAPs) and a Local Equipped Area of Play (LEAP), as well as a swale and open green space.
- 7.41 The proposed development would include housing that overlooks the open green space which would help to ensure natural surveillance of the public space. The proposed development will also include tree planting along the internal street network to create a high quality, attractive public realm.
- 7.42 Overall, the site as a whole will provide sufficient open space to accommodate 99 units proposed under this application, in accordance with adopted local policy and the adopted standards.

Space standards

- 7.43 Policy D DM2 requires that internal spaces are of an appropriate size to meet the requirements of all occupants and their changing needs, using the Nationally Described Standards as guidance.
- 7.44 All the proposed dwellings will meet the internal space standards as per the 'Technical Housing Standards – nationally described space standard'.
- 7.45 Furthermore, all homes would have a usable area of outdoor space and the majority of gardens would be 10m in depth as per the extant Reserved Matters permission on the site. The proposed development has been designed to comply with the space standards as closely as possible and would allow for acceptable living conditions and amenity space for future residents.

Access and accessibility

- 7.46 Policy T SP1 of the Local Plan sets out that the Council will support development that reduces the need to travel by car and where the development has been designed to create safe and secure layouts for all modes of transport. This is set out further within Policy T DM1.
- 7.47 The site benefits from good connectivity to local services and facilities within Bersted and Bognor. The nearest bus stop is located 425m in distance from the centre of the site which provides a regular service to Bognor Regis, Chichester, Havant and Portsmouth. Bognor Regis railway station is 2.7km to the south, with car and cycle

parking provision. As such, there are strong sustainable transport links between the site, Bognor Regis and the wider region.

- 7.48 The proposed access is the same as approved under Section 73 application BE/18/17/PL, which sought an amendment to the location of the access granted under the original outline permission on the site. The proposed access point will correspond with that approved under BE/18/17/PL and BE/113/17/RES.
- 7.49 As such, the vehicular access to the site shall be located in the south-east corner of the site, from New Barn Lane. Pedestrian access to the site (contained within the wider development site) runs alongside the access road, and is on average 1.5m in width, and 1.2m minimum width, as well as through the area of open space adjacent to New Barn Lane.
- 7.50 The internal road layout has been designed in accordance with the design principles for Manual for Streets (Department for Transport, 2007). The road widths are as approved previously under the Reserved Matters application, and where footpaths are provided they will be on average 1.5m in width. Within the application site, there is an area of shared surface proposed. The swept path analysis plans appended to the Transport Statement demonstrate that refuse and emergency vehicles can manoeuvre throughout the access road to reach the site and dwellings proposed. The internal road network has been agreed at under the original Reserved Matters permission, and therefore has been found acceptable previously.
- 7.51 Overall the access strategy proposed reflects that set out within the extant outline and reserved matters application and therefore has been considered acceptable previously.

Traffic impact and Travel Plan

- 7.52 Policy T SP1 further sets out that development will be permitted an application is supported by a Transport Assessment that demonstrates that impacts on local and strategic network can be satisfactorily accommodated/mitigated, and a Travel Plan is provided that is effective and deliverable.
- 7.53 A Transport Assessment was submitted as part of the outline application. The traffic impact of 90 new homes was accepted at the outline stage with appropriate mitigation secured through the Section 106 agreement.

- 7.54 The Transport Statement submitted with this application demonstrates that the traffic impact was overstated at outline stage, and as a result the additional 9 units on the site would not result in any additional traffic over that agreed at outline stage previously. Given that the report submitted to support the outline permission was accepted by Arun District Council and West Sussex County Council, the lesser impacts identified by the updated traffic generation exercise would be similarly acceptable.
- 7.55 In pursuit of reducing the impact of car travel, the need to travel by car and increasing sustainable travel practices, a Travel Plan has been submitted to support this application.
- 7.56 The Travel Plan will have the following objectives:
- * To support a range of sustainable transport alternatives
 - * To develop awareness of options for sustainable travel to and from the site
 - * To promote car sharing, walking, cycling and public transport use
 - * To manage car parking demand across the development and minimise the impacts of car based travel.
- 7.57 The Travel Plan has been previously considered acceptable under the original Reserved Matters application granted on this site and remains the same for this application.

Car Parking

- 7.58 Policy T SP1 requires that development meet the parking standards, in line with West Sussex guidance.
- 7.59 As per the Transport Statement, the proposal will provide 226 parking spaces, of which 191 will be allocated and 35 unallocated, or visitor, spaces. The allocated parking provision is in full accordance with the West Sussex County Council parking calculator.
- 7.60 The proposal would additionally provide wheelchair spaces to serve the 10 dwellings designed for wheelchair users, these are on plot and directly adjacent to the dwellings they serve.
- 7.61 The access street has been designed to be sufficiently wide to accommodate additional occasional parking without obstructing access for refuse, emergency or fire vehicles.

- 7.62 The proposal includes a mix of driveways, garages and visitor parking which have been designed to ensure that they accord with the principles of creating a safe and inclusive development. All garage spaces meet the minimum internal dimensions of 6mx3m.
- 7.63 As demonstrated above, the proposed parking provision meets the requirements of the Council's Parking Standards, and therefore accords with Policy T SP1 of the Local Plan 2018 and Policy HDQ8 of the Bersted Neighbourhood Plan 2014.

Cycle parking

- 7.64 This application provides secure storage for cycling within the curtilage of each house in a store or shed. The proposed cycling parking is in compliance with the cycle parking standards of Arun District Council and Policy HDQ7 of the Bersted Neighbourhood Plan 2014.

Bin and recycling storage

- 7.65 Refuse storage is provided on plot either within garages or to the rear of each dwelling.
- 7.66 As discussed previously, and set out within the submitted Transport Statement, provision for servicing of the site is provided with adequate on-site turning facilities for refuse and emergency vehicles, therefore ensuring such vehicles can enter and exit the proposed development site in a forward gear.
- 7.67 In keeping with Manual for Streets guidance (paragraph 6.8.9) and Building Regulations guidance, bins have been located within 25m carry distance of refuse vehicle and within 30m from a resident's boundary.

Sustainability

- 7.68 The proposed development has been designed with the key principles of sustainable development at the heart of the process. The proposals include a number of key sustainable planning principles as follows:
- A sustainable housing mix with a good mix of house types and tenures to meet the lifecycle needs of the community
 - A network of permeable streets and footpaths that connects the site to local facilities and the town centre by foot, cycle and public transport to help reduce trips by private car

- * A surface water drainage strategy designed to address the impact of climate change integrated into the scheme landscaping to minimise any incidents of surface water flooding
- * The integration of waste recycling facilities for all properties with easy to access bin stores located to the rear of properties to help encourage recycling
- * Buildings constructed to the relevant energy efficiency requirements of building regulations including part L.

Energy Strategy

- 7.69 Policy ECC SP2 seeks development to be energy efficient in accordance with relevant standards, including 10% of energy to be generated from renewable or low carbon energy generation on site.
- 7.70 An Energy Statement has been submitted to support this application to meet the above policy requirements. In summary, the site would achieve a 10.03% reduction in energy through fabric first measures. As such, we consider the site to be acceptable in this regard.

Ecology

- 7.71 Policy ENV SP1 of the Local Plan 2018 states that Arun will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment.
- 7.72 The ecological interest in the site has been wholly taken into account throughout the evolution of the development proposals for the site. Submitted in support of this application is an Ecological Report. Crucial to this has been the commissioning of an ecological enhancement scheme which is appended to that report.
- 7.73 The Ecological Enhancement Strategy proposes the following mitigation measures within the wider site, some of which is applicable to the area proposed for development under this application:
- * Planting of species- rich wildflower grassland within the open space to the east of the site
 - * Temporary protective fencing installed around the treeline adjacent to the northern boundary of the site
 - * Avoidance of increased lighting on hedgerows and treelines to protect bats. Furthermore, use of low pressure sodium lamps for external lighting, bolster

planting to create additional foraging opportunities, and provision of new roosting places in the form of bat boxes on mature trees.

- * Clearance of vegetation outside of main bird breeding season and provision of nest boxes on retained trees.

7.74 Overall, the proposed development would not be harmful to protected species and would incorporate mitigation measures to provide the opportunity for biodiversity enhancement within the site.

7.75 These proposed mitigation measures were accepted under the original Reserved Matters application (BE/113/17/RES) and therefore the principle and detail has been agreed previously.

7.76 In addition to the above, it is recognised that the site is located within the 5km buffer zone of Pagham Harbour SPA. As per Policy ENV DM2, Linden Homes are willing to make contribution to the agreed strategic approach to access management at Pagham Harbour. The development furthermore creates easily accessible new green space for recreation as well as opportunity to connect into the nearby public right of way network which will help to discourage car use.

7.77 This is discussed further in the accompanying report "Information to enable Habitats Regulations Assessment".

Surface Water Drainage

7.78 A Drainage Plan has been submitted to support the application. Onsite soakage tests showed that infiltration SuDS are unsuitable for this site and therefore it is proposed that surface water runoff from roofs, driveways and roads will be collected by a conventional system of guttering, downpipes and drains which will be discharged via a surface water pipe network to either an attenuation basin or tank.

7.79 Surface water flows would be attenuated with a restricted discharge rate of circa 13 l/s to match existing greenfield rate, with two discharge points into an existing watercourse and into the Southern Water existing sewer.

7.80 The SuDS are sized to manage for a 1 in 100 year storm event, plus a 40% climate change allowance up to 2115.

- 7.81 Southern Water letters have been submitted to demonstrate there is capacity within the wider network to connect this site.

Foul Water Drainage

- 7.82 The accompanying Drainage Statement provides detail with regard to the foul water drainage for this application. This involves drainage by gravity to an existing public sewer system located beyond the east of the site boundary, within New Barn Lane. A pumping station within the site will serve a number of the properties in order to connect into the foul drainage network.

- 7.83 Southern Water letters have been submitted to demonstrate there is capacity within the wider network to connect this site.

Contaminated land

- 7.84 Policy QE DM4 of the Local Plan 2016 seeks evidence to show that unacceptable risk from contamination will be successfully addressed through remediation.

- 7.85 A desk based contaminated land and geotechnical assessment is submitted to support this application which identifies that there are no potential on- site sources of contamination. However, a number of potential off- site sources of contamination are identified. This report has been previously considered under the outline permission BE/142/15/OUT, and the site considered acceptable for residential development subject to conditions securing additional information in the event that contamination is found during the course of the application. My client raises no objection a similar condition being imposed on any granting of this application.

Archaeology

- 7.86 Policy HER DM6 requires a desk based archaeological assessment where a site has potential to include heritage assets with archaeological interest.

- 7.87 A Written Scheme of Investigation for archaeological trial trench evaluation has been submitted to support the application, which followed a previous archaeological desk based assessment that identified some potential for Prehistoric, Roman and Medieval archaeology. The WSI summarises the potential archaeological remains and details the method of trial trenches to be undertaken on the site.

- 7.88 Following the completion of the trial trenching, a post-excavation assessment was provided, which details that no archaeological remains of note were identified on the site, and therefore no further archaeological work is required.
- 7.89 Given the above conclusions, Policy HER DM6 is satisfied and no further archaeological work would be required in relation to this application.

Planning Obligations

- 7.90 Linden Homes South are willing to enter into a legal agreement in order to secure any obligations which are necessary, directly related to the development and reasonable in terms of scale and kind to the application, as per the CIL Regulation 2011. A Heads of Terms has been submitted with this application.

Community Infrastructure Levy (CIL)

- 7.91 Arun District Council is currently in the process of preparing a Community Infrastructure Levy, with previous consultations held in 2015. It is understood that a Preliminary Draft Charging Schedule is due to be released for consultation in January 2019.
- 7.92 Given the early stage of preparation of the CIL charging schedule, and the timeframes likely to be associated with this application, the emerging CIL charge is not considered to be relevant for this application.

Other matters

- 7.93 The site would be delivered in a single phase, and therefore it is not considered necessary for a phasing plan to be required.
- 7.94 A Construction Management Plan has been submitted with this application. The Plan has been previously approved by Arun District Council under Condition 12 of BE/18/17/PL and therefore has been considered previously acceptable.
- 7.95 A street lighting scheme has been provided to support the application, which demonstrates that it would not have an adverse impact on the surrounding wildlife. This has been approved under condition 21 of BE/18/17/PL, and therefore has been previously considered acceptable by the Council.
- 7.96 A fire hydrant plan shall be provided to the Council to show the proposed locations of fire hydrants under this scheme during the course of the application.

8.0 CONCLUSIONS

- 8.1 This application seeks permission for 99 dwellings together with associated works. It is demonstrated within this planning statement how the development proposals will deliver the three strands of sustainable development identified within the NPPF 2018.
- 8.2 The site is located within the Built Up Area Boundary (BUAB), as defined on the Proposals Map which accompanies the Local Plan 2018. Policy SD SP2 sets out that development should be focused within the BUAB and will be permitted subject to consideration of other policies. As the most recently adopted policy, this takes precedence over the BUAB contained within the adopted neighbourhood plan, and therefore the general principle of development in this location is acceptable.
- 8.3 There is extant outline and reserved matters permission for 90 units on the site. As set out within the Design and Access Statement and throughout this Planning Statement, the overarching principles of the proposed access, appearance, layout, landscaping and scale of development would remain the same as that approved under permissions BE/18/17/PL and BE/113/17/RES. This is a material consideration in the determination of the application.
- 8.4 The proposed additional 9 units on the site in comparison to the extant scheme is a result of market demand for smaller units on the site. The proposed mix broadly accords with the Housing Needs Assessment 2016 which identifies a need for 2 and 3 bedroom dwellings. 30% affordable housing has been provided on the site, and 11 wheelchair suitable dwellings have been spread between the affordable and market units.
- 8.5 The layout has taken into account feedback from Arun District Council Officers through pre-application and subsequent meetings, and consideration has been taken to ensure parameters such as bungalows along the frontage of New Barn Lane have been retained.
- 8.6 The technical statements submitted in support of this application demonstrate that the additional 9 units on the site, over the permitted 90 unit scheme, could be accommodated within the drainage and open space strategies for the site. Furthermore, it is demonstrated that the 99 unit scheme would not prejudice highway safety. Therefore, the application is in accordance with local policy in this regard.
- 8.7 The proposals reflect the principles set out in the outline and reserved matters permissions, which are a material consideration, and accord with the policies contained within the development plan. Therefore, we respectfully request that the proposal is approved without delay.