



Quod

Planning Statement

Former Bartons Infant
School Site, North
Bersted

APRIL 2022

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- Document 2 – Affordable Housing Plan
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Executive Summary

In July 2021 West Sussex County Council appointed Lovell Partnerships as its strategic Private Sector Development Partner. The objective of the 30 year partnership is to bring forward surplus land assets to facilitate the delivery of residential homes, town centre commercial delivery and extra care provision across the District. The LLP formed between Lovell Partnerships and Edes Estates (West Sussex) and is officially known as West Sussex Property Development LLP.

The site of the former Bartons Infant School in North Bersted represents an ideal opportunity to provide much needed homes (including affordable homes) within Arun District Council.

This site presents a unique opportunity to promote brownfield development in a location that is well suited to accommodating a residential development of a type and scale proposed within the Planning Application, as evidenced by the proposal's conformity with the Bersted Neighbourhood Plan which allocates this site as being appropriate for a minimum of 20 homes.

The proposed development has been prepared by West Sussex Property Development LLP in close working partnership with Arun District Council, other key stakeholders and the public.

When preparing the application, the design team has paid careful attention to the Development Plan (including the Arun Local Plan and the Bersted Neighbourhood Plan) and relevant material considerations (including Arun District Council's Design Guide, the NPPF and the NPPG). The application proposals, including the design, directly respond to the relevant planning policy context.

The Planning Application delivers a number of important benefits, including:

- It brings a vacant brownfield site back into beneficial use to the benefit of the community;
- It facilitates the delivery of 21 much needed homes that positively contribute to Arun's housing supply;
- It provides a range of housing types appropriate for the needs of the local population;
- It provides dedicated private amenity space in the form of private gardens, in addition to a communal garden in the heart of the site; and
- It delivers a high quality, carefully considered design solution, refined throughout the pre-application process.

This Planning Statement should be read in the context of the proposed application drawings and other supporting material. Together the suite of documentation demonstrates that planning permission should be granted for the proposals.

1 Introduction

- 1.1 This Planning Statement accompanies a full Planning Application submitted on behalf of West Sussex Property Development LLP (the "Applicant") in respect of the redevelopment of the former Bartons Infant School site in North Bersted ("the Site").
- 1.2 The Planning Application seeks consent for the following:

"Demolition of former school building and redevelopment of the Site to provide 21 dwellings and associated car parking, cycle parking and landscaping."

- 1.3 The Planning Statement reviews the Planning Application proposals in light of the Development Plan and relevant material considerations, including national policy and relevant national and local guidance, setting out the clear and demonstrable benefits of the redevelopment of the existing vacant building and delivery of new homes (the "Proposed Development").
- 1.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. For the reasons set out in this Planning Statement, the Proposed Development accords with the Development Plan and complies with the relevant material considerations, principally the National Planning Policy Framework (2021) ("NPPF").
- 1.5 In addition to this Planning Statement, the Planning Application is supported by the following documentation:

Table 1 - Planning Application Submission Documents

Document	Author
Application Forms	Quod
CIL Additional Information Form	Quod
Application Drawings	Allies and Morrison
Design and Access Statement	Allies and Morrison
Landscaping Strategy (within DAS + supporting drawings)	Hyland Edgar Drive
Affordable Housing Statement (within Planning Statement)	Quod
Section 106 Obligations / Heads of Terms (within Planning Statement)	Quod
Statement of Community Involvement	Quod
Flood Risk Assessment and Surface Water Drainage Statement	GTA

Sustainability Statement and Energy Strategy	Waterstone
Tree Survey and Arboricultural Impact Assessment	Hayden's Arboricultural Consultants
Noise Assessment	Sol Acoustics
Transport Statement (including Parking Survey)	Vectos
Ecological Impact Report	EHM Ltd
Habitat Survey (within Ecological Impact Report)	EHM Ltd
Biodiversity Net Gain Report (Biodiversity Checklist)	EHM Ltd
Air Quality Assessment	South Downs Environmental Consultants

1.6 This suite of documents demonstrates that the Proposed Development accords with the Development Plan and that there are significant material considerations which weigh in favour of development.

1.7 The Planning Statement is structured as follows:

- **Section 2 - Factual Background:** This section confirms the relevant development context to the Site, including a description of the surrounding area and confirmation of the relevant planning history position.
- **Section 3 - Details of the Proposed Development:** This section describes the application proposals.
- **Section 4 - Relevant Policy Context:** This section provides a commentary on the Development Plan and details the relevant material considerations.
- **Section 5 - Planning Assessment:** This section evaluates the Proposed Development against the relevant policies of the Development Plan and relevant material considerations (including supporting guidance where appropriate).
- **Section 6 - Potential S106 Obligations:** This section summarises the potential planning obligations that will be provided in connection with the Proposed Development and confirms the position regarding Community Infrastructure Levy.
- **Section 7 - Conclusions:** This section provides a summary of the justification for granting planning permission for the Proposed Development.

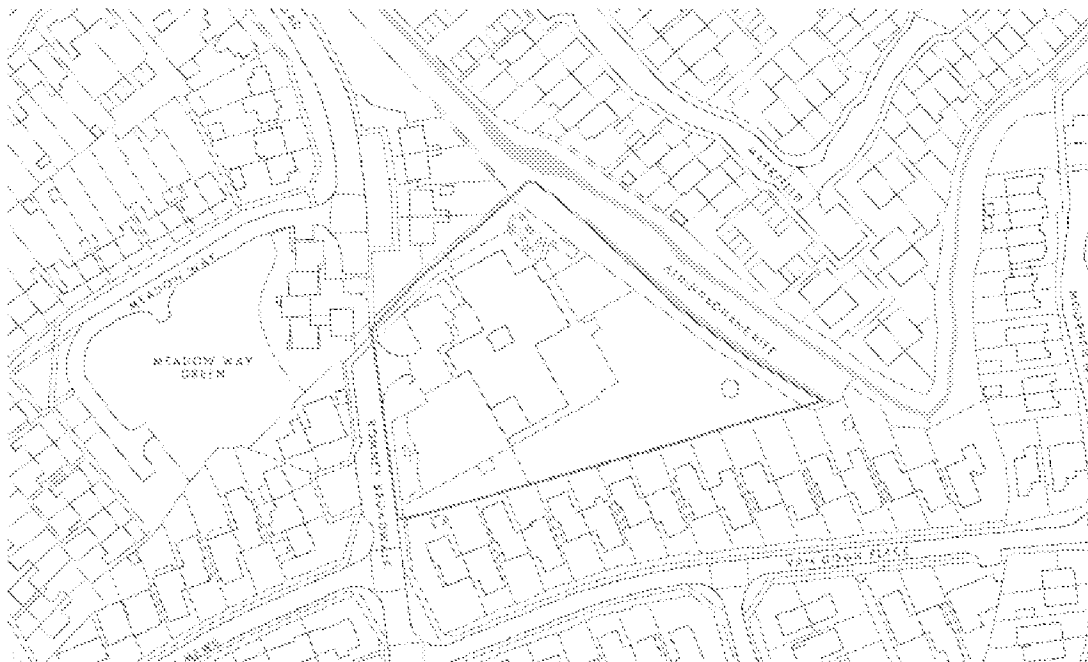
2 Factual Background

- 2.1 This section sets out the relevant development context of the Site, including a description of the Site, an overview of the surrounding area and confirmation of relevant planning history. This section also confirms pre-application engagement with the Local Planning Authority, key stakeholders and the public.

Application Site

- 2.2 The application Site is confirmed below in Figure 1.

Figure 1 – Site Location Plan



- 2.3 The Site contains former school buildings and related hard standings and fielded areas. The Site is irregular in shape (a trapezoid) and measures 0.61 hectares.
- 2.4 The former occupier of the Site, Bartons Infant School, ceased to use the Site in July 2014, and the Site has been vacant since. The Site has been the subject of frequent vandalism and antisocial behaviour over the past few years.
- 2.5 The buildings on Site are not listed, nor are there any located in the immediate vicinity. Furthermore, the Site is not located in a conservation area.
- 2.6 The Site is located within Flood Zone 1, meaning that there is less than 0.1% chance of the Site flooding in any year.

Surrounding Context

- 2.7 The area immediately surrounding the Site is largely characterised by low rise residential dwellings.
- 2.8 The southern boundary of the Site is defined by single storey bungalows on Van Gogh Place, whilst the western boundary is formed by Romney Broadwalk and a 2.5 storey flatted development known as Lea House. The northern and eastern boundaries of the Site are screened by mature trees, with single storey bungalows and 2 storey houses beyond.
- 2.9 The irregular shape of the Site means that distances from the Site boundary to existing adjacent buildings is not consistent. In particular, the rear gardens of the residential properties on Van Gogh Place are, in some cases, noticeably short.

Planning History

- 2.10 From a review of planning records available online relating to the Site there is no relevant planning history of note.

Pre-Application Engagement

- 2.11 Prior to the submission of this Planning Application the Applicant has undertaken engagement with the Local Planning Authority to address a number of issues, including:
- Residential mix (private and affordable);
 - Site layout considerations;
 - Application of the Arun District Council Design Guide (2021);
 - Highways and access considerations, including parking; and
 - Vacant Building Credit.
- 2.12 In addition, the Applicant has undertaken pre-application consultation with the public and key stakeholders. Further detail on this is provided within the Statement of Community Involvement which supports the Planning Application.
- 2.13 The approach that informed the pre-application engagement activities is drawn from best practice and comprises the following key principles:
- **Communicate and inform early** - set out the programme, the constraints, when and how people can engage and what the anticipated outcomes may be;
 - **Inclusivity** - proactively reach out to less heard voices and give additional support for people to engage who are not experts in planning policy and process;
 - **Multi-stranded** - engagement across multiple channels;
 - **Meaningful engagement** - which is not just about numbers involved or consulted but about giving the community a voice in influencing the designs;

- **Proportionate** - this is an important scheme on the site of a former community asset that will contribute to North Bersted, so it warrants extra emphasis and reach on the community engagement;
- **Influential feedback** - consider the feedback and seek to amend the evolving proposals where appropriate and feasible; and
- **Report back** - to those who engaged to give them appropriate updates following the submission of their comments.

2.14 The separate Statement of Community Involvement provides further detail on the two key strands to the pre-application consultation process undertaken by the Applicant (i.e. stakeholder consultation and community consultation).

3 Proposed Development

- 3.1 This section describes the Proposed Development and defines the principal components of the application proposals.
- 3.2 The Planning Application is accompanied by a full set of visual and illustrative material, prepared by Allies and Morrison, which illustrates the Proposed Development and explains the rationale behind the design as submitted for approval.

Key Development Proposals

- 3.3 The Proposed Development comprises the following:
- A high-quality redevelopment of the Site.
 - Demolition of the existing school buildings and removal of supporting infrastructure.
 - A total of 21 new homes including the following mix:
 - i. 2 Bedroom, 3 Person House: 6
 - ii. 2 Bedroom, 4 Person House: 6
 - iii. 3 Bedroom, 4 Person House: 8
 - iv. 4 Bedroom, 6 Person House: 1
 - Provision of on-site affordable housing including 6 units (to be agreed with the Arun District Council Housing Delivery Team during the determination period).
 - Provision of 32 parking spaces designed to serve residents and visitors.
 - Provision of 42 cycle parking spaces on site.
 - Provision of private amenity space in the form of rear private gardens for each of the new dwellings.
 - Provision of a communal green space at the heart of the Site.
 - Enhancement of existing Site access / egress from the public highway, together with provision of new internal road within the Site to serve the new dwellings.
 - Incorporation of green landscape within the scheme to assist biodiversity, including the provision of trees on Site.

4 Relevant Policy Context

4.1 This section provides a commentary on the key Development Plan policies which are relevant to the Proposed Development, together with a summary of the relevant material considerations. An assessment of the Proposed Development against the policy context is provided in Section 5.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires development proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan in this instance consists of:

- Arun Local Plan 2011-2031 (July 2018);
- Bersted Neighbourhood Plan (November 2014);
- West Sussex Waste Local Plan (2014); and
- West Sussex Joint Minerals Local Plan (2018) and the Soft Sand Review (2021).

4.3 The key Development Plan policies and material considerations are detailed below.

Arun Local Plan

4.4 The Arun Local plan was adopted in 2018 and sets out a spatial vision, objectives and a sustainable strategy for growth needed within the District over the period 2011-2031.

4.5 The purpose of the Local Plan is to encourage sustainable development and manage future growth whilst ensuring change across the District meets local need.

4.6 The vision of the adopted Arun Local Plan is:

"By 2031 Arun will be a safer, more inclusive, vibrant and attractive place to live, work and visit. Arun's residents will be healthier and better educated, with reduced inequalities between the most and least affluent."

4.7 A number of Local Plan policies relevant to the assessment of the Proposed Development are set out in Section 5.

Bersted Neighbourhood Plan

4.8 The Bersted Neighbourhood Plan was adopted in 2014 and provides a vision for the future of the Parish, whilst setting out clear policies and objective to realise these visions.

4.9 The vision of the Bersted Neighbourhood Plan is to create a neighbourhood where the quality of life is steadily improved over the timeframe of the Plan. The Plan sets out the following objectives:

" Support, encourage and promote a range of shops and businesses and provide an environment for enterprise and tourism to flourish*

** Preserve and enhance our valued green and open spaces*

** Maintain the rural aspect of the parish and the open spaces and views*

** Promote and support safe travel for all*

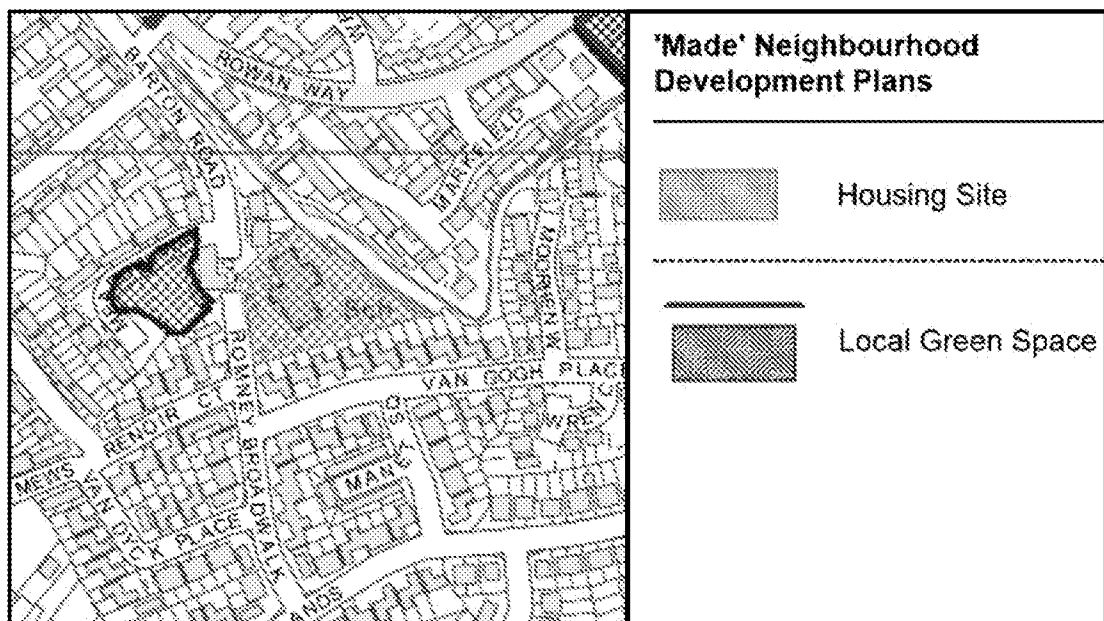
** Promote opportunities for people young and old in education, leisure, health care, training and employment*

** Ensure that the community is supported by an effective infrastructure particularly in relation to drainage and flood protection*

** Maintain Bersted's local character, protecting and enhancing its high quality environment and cultural and historical heritage."*

4.10 The Site is subject to a 'Housing Site' designation in the Bersted Neighbourhood Plan. An extract from the Proposals Map is provided at Figure 2 below.

Figure 2 – Proposals Map Extract



4.11 The allocation is for a minimum of 20 homes.

Material Considerations

4.12 There are a series of material considerations that are relevant to the Site as summarised below.

Emerging Local Plan

- 4.13 Arun District Council is currently working on its new Local Plan, however it is understood that following the outcome of a committee meeting held on 30 November 2021, the Local Plan Review process has been delayed.
- 4.14 It is understood that there is currently no programme for the Local Plan review. A report is to be considered by committee in May 2022 which will outline the Council's approach in response to an update on planning reforms expected to be set out in the Planning Bill to be progressed through Parliament.

National Planning Policy Framework

- 4.15 The revised NPPF was published in July 2021.
- 4.16 Paragraph 2 of the NPPF states:

"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements."

- 4.17 The NPPF introduces the presumption in favour of sustainable development. Paragraph 10 of the NPPF states:

"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs."

- 4.18 Paragraph 11 states, inter alia:

"Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay;

or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

4.19 Section 5 of the NPPF relates to delivering a sufficient supply of homes. Paragraph 60 states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

4.20 The central theme of the NPPF is the presumption in favour of sustainable development. The delivery of housing in sustainable locations is encouraged at all policy levels particularly where this related to previously developed land.

Additional Material Considerations

4.21 The following documents are additional material considerations that are relevant to the Site:

- Arun Design Guide SPD (2021) – sets out a series of principles to inform new development including density, back to back distances, street typologies, external space standards, waste and recycling facilities, etc.
- WSCC Guidance on Parking at New Development (2020) – sets requirements and principles for residential parking, cycle parking and electric vehicle charging points.
- Open Space, Playing Pitches, Indoor and Built Sports Facilities SPD (2020) – sets out how the provision of high-quality open space, playing pitches, indoor and built sports facilities are to be calculated in new development.

4.22 These material considerations are dealt with as appropriate in the suite of supporting application documents.

Conclusion

4.23 Development Plan policy and guidance is supportive of sustainable development. The delivery of housing in sustainable locations is encouraged at all policy levels particularly in the context of Arun District Council's current housing land supply and delivery position. The proposal presents an opportunity to utilise a piece of vacant brownfield land, which has been the subject of regular vandalism and antisocial behaviour in recent years and provide much needed housing.

4.24 The following section identifies the detailed policies and guidance relevant to the consideration of the Proposed Development.

5 Planning Assessment

5.1 This section provides an assessment of the Proposed Development against policies in the Development Plan and relevant material considerations.

5.2 The planning assessment considers the main issues and planning considerations as follows:

- Principles of development – new homes;
- Private residential unit mix;
- Affordable housing;
- Residential standards and design;
- General design principles;
- Transport and parking;
- Noise;
- Biodiversity, landscaping and ecology considerations;
- Sustainability and energy; and
- Drainage.

5.3 Further consideration of each of these topics is provided below. Relevant Development Plan policy by theme is included at **Document 1**.

Principle of Development – New Homes

5.4 Arun's Local Plan identifies that the strategic objective for housing delivery is to plan and deliver a range of housing mix and types in locations with good access to employment, services and facilities to meet the District's housing requirements and the needs of Arun's residents.

5.5 Policy HSP1 (The Housing Requirement) identifies that within the Plan period (2011-2031) at least 20,000 new homes will be accommodated in the District.

5.6 Policy HDQ1 (Housing Site Allocations) of the Bersted Neighbourhood Plan identifies that permission will be granted for a minimum of 25 new homes in Bersted on land identified on the Proposals Map provided that the new development meets the requirements of the policies set out in the Neighbourhood Plan and Arun's Local Plan. There are two sites identified within Policy HDQ1 - which includes the former Bartons School site for a minimum of 20 homes (i.e. the Site).

- 5.7 Therefore, on the basis that the Proposed Development includes 21 units, it accords with local policy and the housing requirements prescribed through Policy HDQ1 of the Bersted Neighbourhood Plan.
- 5.8 In addition, Arun District Council's current housing supply and delivery position adds further support to redevelopment of the Site, as summarised below.
- 5.9 Arun District Council's latest 5-year Housing Land Supply is contained within the 2020-2021 Annual Monitoring Report published following a Planning Policy Committee on 25 January 2022. The AMR deals with the period between 1 April 2020 and 31 March 2021. The document demonstrates that Arun District Council cannot demonstrate a 5-year supply of housing land, with current supply extending to just 2.42 years.
- 5.10 Further to the above, the Department for Levelling Up, Housing and Communities published the results of the 2021 Housing Delivery Test in January 2022. The Housing Delivery Test compares net homes delivered over the last three years to the homes that should have been built over the same period (the housing requirement). This showed that for the period 2018 - 2021 Arun District Council should have provided 2,891 new homes, but delivered just 1,872 - representing 65% of their Development Plan target. In this context, as per Paragraph 222 of the NPPF, if the Housing Delivery Test indicates that delivery was below 75% of housing required over the previous 3 years, the presumption in favour of sustainable development applies.
- 5.11 As identified in Paragraph 11 of the NPPF for decision-taking, this means granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 5.12 The Site is specifically allocated for residential development (a minimum of 20 homes), and the Council's inability to demonstrate a 5-year Housing Land Supply coupled with recent residential delivery performance supports further residential accommodation being delivered at the Site, particularly in the context of the numerous benefits delivered by the Proposed Development as confirmed in this Planning Statement.
- 5.13 In this context, the principle of providing new homes at the Site is acceptable subject to satisfying other development management policies.

Private Residential Unit Mix

- 5.14 Local Plan Policy DM1 identifies that for developments of 11 or more homes the Council will require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the latest SHMA.
- 5.15 The Bersted Neighbourhood Plan Policy HDQ4 (Housing Mix) states proposals for new housing must deliver a range of house types and tenures. The policy notes that applicants will be expected to provide a "*Bersted-specific dwelling mix*".

5.16 The latest housing needs evidence is provided in the Updated Housing Needs Evidence (GL Hearn Document) dated September 2016.

5.17 For market housing the 2016 SHMA identifies the following target mix:

- 1 Bedroom – 5-10%
- 2 Bedroom – 40-45%
- 3 Bedroom - 35-40%
- 4+ Bedroom – 10-15%

5.18 The Proposed Development's market housing mix is provided below:

2016 Private Target Mix	Proposed Development Units (as %)
1 and 2 Bed – 45-55%	8 (53%)
3 and 4+ Bed – 45-55%	7 (46%)

5.19 The proposed private residential mix provides a wide range of units that meets the needs of the local population and optimises the Site allocation. To this end, the Proposed Development provides a Bersted-specific dwelling mix as required by the Bersted Neighbourhood Plan.

5.20 Policy DM1 of the Local Plan provides reliance on the 2016 SHMA for its recommended guidance, which is clearly now outdated (and is only guidance). Notwithstanding this, the Proposed Development provides a genuinely balanced mix of market units, including family houses, which will provide a major benefit to the local area. As demonstrated above, the Proposed Development complies with the guidance.

5.21 Local Plan Policy DM1 explains that tenure mix will be negotiated on a case-by-case basis, taking into account viability considerations. The proposed unit mix is considered to be suitable, whilst having the ability to maximise the potential of the Site and deliver the number of units prescribed in the Bersted Neighbourhood Plan.

5.22 Importantly, the Proposed Development targets the optimisation of the Site and the proposals are considered appropriate for its location. The proposed housing mix is deemed necessary for optimising housing delivery on this brownfield Site, especially when considering the Site's small size and complex shape, whilst not compromising on the high-quality design.

5.23 Therefore, on the basis that the Proposed Development will deliver a good range of units considered suitable for this location, it is considered the mix of private housing proposed is acceptable and suitable for this specific location.

Affordable Housing

Affordable Housing Statement - Amount and Tenure

5.24 Arun District Council's local list of validation requirements sets out that planning applications proposing 11 or more residential units should provide written confirmation on the proposed approach to affordable housing. In line with the validation requirement, further detail is provided below:

- The Proposed Development includes 6 on-site affordable homes, which equates to 30% of the total number of units proposed. The Proposed Development therefore complies with Local Plan Policy AH SP2.
- The tenure of these affordable homes will be confirmed following discussions with Arun District Council's Housing Delivery Team and Planning Team during the determination period of the Planning Application.
- The Proposed Development currently provides no First Homes. As set out in the NPPG the requirement to provide First Homes in a development is a material consideration in the determination of planning applications and consideration of the overall affordable housing provision should be undertaken in the round against Development Plan policy and other material considerations. It is considered that the Proposed Development comprises an acceptable and appropriate form of development which addresses the principal housing and affordable housing planning policies.
- An indicative plan showing the location of these affordable homes is enclosed at **Document 2**.
- The floorspace of these affordable homes is confirmed on the plan at Document 2.

5.25 Following validation of this Planning Application the Applicant will engage in further discussions with Arun District Council's Housing Delivery and Planning teams regarding the above.

Vacant Building Credit

5.26 The Applicant is seeking to obtain Vacant Building Credit in respect of the Proposed Development at the Site.

5.27 The Applicant's supporting case is enclosed at **Document 3**.

Residential Standards and Design

5.28 Local Plan Policy D DM2 (Internal Space Standards) identifies that the Council will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs, as set out in Nationally Described Space Standards.

5.29 The Design and Access Statement confirms that all of the dwellings are compliant with these standards.

5.30 Accessible Homes and residential amenity space standards are detailed further below.

Accessible Homes

5.31 Arun's 'Accommodation for Older People and People with Disabilities' guidance outlines the Council's recommended level of provision for accessible and wheelchair friendly homes.

5.32 The guidance sets out that for schemes of between 11 and 50 units a minimum of 30% of units should be designed to M4(2) standards. The Proposed Development achieves this.

Residential Amenity Space

5.33 The Arun Design Guide (2021) provides further detail with regard to residential amenity.

5.34 With regards to amenity space, the Arun Design Guide states that development should provide private and community residential outdoor amenity spaces which are of a high quality and can be safely and conveniently accessed by all residents.

5.35 All of the proposed dwellings contain private outdoor amenity spaces accessed to the rear of the properties.

5.36 The Proposed Development also provides a communal garden in the heart of the Site, offering communal outdoor amenity space for the residents. This communal space will be high-quality and accessible by all residents of the Proposed Development. The central communal amenity space is considered a major benefit delivered by the Proposed Development.

5.37 The Design Guide identifies amenity spaces should be of an appropriate size and shape to be usable and enjoyable. It states that private rear gardens should have a minimum depth of 10.5 metres, and balconies should be a minimum of 3sqm of usable space clear from door swings and be able to accommodate a table, chairs and space for planting.

5.38 The Proposed Development provides optimum garden spaces, considering the site constraints present, including, the location of a water network directly to the east of the Site and the relatively close proximity of existing dwellings to the south on Van Gogh Place.

5.39 The Proposed Development is considered acceptable in terms of amenity provision, particularly in the context of seeking to optimise the number dwellings that can be delivered on the Site and the nature of the Site (i.e. relatively tight in terms of proximity to neighbouring properties and irregular in shape) whilst not compromising high quality design.

General Design Principles

5.40 Local Plan Policy DSP1 provides Arun's overarching design position. It requires all development proposals to seek to make efficient use of land but reflect the characteristics of each site and its local area in terms of layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

5.41 Additionally, the policy identifies that development proposals shall be derived from a thorough site analysis and context appraisal.

- 5.42 The density of the Proposed Development is considered to be appropriate and in keeping with the setting of the surrounding area, whilst it also optimises the amount of dwellings that can be appropriately accommodated on the Site. The Proposed Development has a density of 34.4 dwellings per hectare which is well suited to the site context (the surrounding area is generally comprised of low rise, low-density residential dwellings).
- 5.43 Local Plan Policy DDM1 sits alongside Policy DSP1 and identifies detailed criteria that the Council will have regard to when considering development proposals. The criteria includes:
- Character;
 - Appearance/ attractiveness;
 - Impact;
 - Innovation;
 - Adaptability;
 - Crime prevention;
 - Trees and woodland; and
 - Solar gain.
- 5.44 As demonstrated within the Design and Access Statement which supports this Planning Application, the design of the Proposed Development responds directly to the context of the Site and its surrounding area. The adjacent area is mainly comprised of low-rise residential dwellings, of a maximum of three storeys in some instances. In response, the Proposed Development provides 21 two storey dwellings of a height and density sensitive to the character and context in which it sits.
- 5.45 In addition, in terms of landscaping, the proposed landscape plans submitted in support of this Planning Application highlight how the Proposed Development enhances the greening of the Site and maximises the landscaping through the provision of a range of green infrastructure. The landscaping approach demonstrates a high standard of architectural principles through the use of soft landscaping measures which are representative of the North Bersted area.
- 5.46 As shown within the Design and Access Statement, the landscape proposals enhance the existing character of the Site and provide a contemporary residential development with a naturalistic feel suitable to the location. A communal green area at the heart of the Site will be provided that will offer an attractive focal point to the development.
- 5.47 Further detailed guidance relating to general design principles is set out in the adopted Arun Design Guide (2021). This guidance has been properly considered and informs the design of the Proposed Development.
- 5.48 The Design Guide includes guidance on a number of issues, including separation distances (e.g. back-to-back dimensions, back-to-boundary dimensions). The irregular shape of the Site

(i.e. trapezoid) and the need to optimise housing delivery in this location in line with the Bersted Neighbourhood Plan allocation means that it is extremely challenging to achieve all of the separation distance guidelines and, importantly, still be able to provide the new green communal park in the heart of the Proposed Development. If the entire Design Guide were to be complied with in full at the Site, it would mean that the new green communal park could not be provided.

5.49 However, notwithstanding this, the majority of the new homes do meet the guidance in terms of separation distances, with the only breaches arising as a result of the rear extensions to properties on Van Gogh Place and the comparatively short garden lengths to the south of the Site (back-to-back). However, in these instances the proposed back garden dimension distances for the Proposed Development are achieved. The proposed layout is also compliant with the required 14m back/front to side separation distance as set out in the Design Guide.

5.50 In this context, the status and role of the Design Guide should be acknowledged. The Design Guide states at Page 10:

"...the Design Guide builds upon and provides more detailed advice and guidance on policies within the adopted Arun Local Plan. The document does not form part of the development plan and therefore cannot introduce new planning policies or targets for development, or amend those that exist. It is however a material consideration in Arun District Council's decision-making, giving direction on how policies should be implemented in order to deliver high quality design, and signposting to further relevant guidance where appropriate."
(our emphasis)

5.51 Therefore, with this in mind and given the level of overall conformity, it is considered that the Proposed Development presents a robust and suitable design solution, providing an acceptable level of amenity for both future and existing residents.

Transport and Parking

Car Parking

5.52 WSCC adopted car parking standards in September 2020. The WSCC standards identify that the Proposed Development is located in Parking Behaviour Zone 2 meaning that there is an assigned set of target parking spaces for each size of home. The WSCC guidance also includes guidance for disabled parking and visitor parking. Importantly, the WSCC guidance allows for a variation of provision from the standards where demand for parking is lower, evidenced through supporting justification, for example parking beat surveys.

5.53 Arun District Council adopted its own standards in January 2020 (contained within their Parking Standards Supplementary Planning Document). These standards are very similar to the WSCC standards, with the Arun figures rounded to whole numbers.

5.54 The Proposed Development represents an appropriate parking approach bearing in mind several important factors, including the proposed number of homes at the Site, the size and mix of the proposed homes, proximity to existing services (and the ability to travel on foot), proximity to public transport connections, and the general level of parking demand in the locality.

5.55 The following points support the proposed approach to parking within the Proposed Development:

- Each 2 bed home has a dedicated off-street parking space, whilst the 3 and 4 bedroom homes have 2 dedicated off-street spaces. This is an appropriate level of dedicated provision.
- The level of car parking provided is considered to represent an optimum level in order to provide other major public benefits within the Proposed Development, such as the communal green open space in the heart of the Site.
- The Parking Beat Survey (attached to the Transport Statement) recorded just two vehicles parked on the Romney Broadwalk cul-de-sac throughout the two survey days, meaning that there is significant capacity for additional cars to park on Romney Boardwalk and nearby streets.
- Even if required (which it is not) providing any additional car parking spaces on Site would adversely impact the Proposed Development's ability to deliver a high quality design approach on this relatively constrained Brownfield site, and would limit the potential of the Site to achieve the Council's housing allocation of at least 20 new homes in this location.

5.56 Further detail and justification is provided within the Transport Statement which supports this Planning Application. The proposed approach follows positive pre-application engagement between the Applicant and the Highways Authority.

5.57 In summary, the Proposed Development provides an acceptable level of car parking provision which will serve residents of and visitors to the new homes without impacting on parking demand in the locality or preventing the Proposed Development to achieve all the important public benefits set out in this Planning Statement.

Cycle Parking

5.58 Similar to car parking, both WSCC and Arun District Council have their own cycle parking standards. Both sets of standards require, at a maximum, 2 spaces per new residential home.

5.59 The Proposed Development provides 2 cycle parking spaces per home and therefore meets the policy requirement.

5.60 The cycle parking facilities are safe, secure, and on-plot.

Noise

5.61 Policy QE DM1 of the Local Plan relates to the impact of noise of new developments and outlines that, proposal for new noise generating developments must be supported by:

- *" Evidence to demonstrate that there are no suitable alternative locations for the development.*

- *A noise report which provides accurate information about the existing noise environments, and the likely impact of the proposed development upon the noise environment.*
- *Evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity."*

5.62 The Planning Application is supported by a Noise Impact Assessment, which concludes that the Site is categorised as a 'negligible risk to low risk' site (as defined by ProPG), and therefore the Proposed Development is acceptable from a noise perspective.

5.63 Additionally, appropriate indoor ambient noise levels will be achieved within all proposed internal habitable rooms across the Proposed Development and it is considered that the proposed scheme provides high-quality external amenity spaces for the residents of the development.

Biodiversity, Landscaping and Ecology

5.64 Policy ENV DM5 of the Local Plan sets out that new development schemes shall seek to achieve a net gain in biodiversity and protect existing habitats on site, whilst also incorporating elements of biodiversity including green walls, roofs, bats and bird boxes as well as landscape features that minimise adverse impacts on existing habitats.

5.65 The proposed landscaping scheme demonstrates that a range of soft landscaping techniques will be implemented, in addition to the retention and planting of trees.

5.66 The Preliminary Ecological Assessment Report which supports this Planning Application confirms that the Site has been assessed as having potential to support protected and notable species. A series of recommendations have been adopted to reduce the Proposed Development impacts on wildlife, as well as ensuring compliance with relevant legislation and planning policies.

5.67 The Applicant intends to submit to the Local Planning Authority a Bat Emergence Survey by the end of May 2022. The principle of this has been discussed and agreed with the Local Planning Authority prior to the submission of this Planning Application.

5.68 The Biodiversity Net Gain Report which supports this Planning Application confirms that, when assessed against the DEFRA Matrix 3.0, the on-Site net change in biodiversity is recorded as 10.38%. This is largely met by retaining and enhancing scrub habitat on the eastern boundary of the Site, as well as retaining several medium and large trees. This on-Site net gain in biodiversity is a significant benefit of the Proposed Development.

5.69 In terms of trees, the Applicant has undertaken thorough public engagement, in particular with the residents of the properties on Van Gogh Place to the south of the Site. The proposed approach to tree removal versus new planting is in direct response to this pre-application engagement and is considered to appropriately protect and enhance the amenity of both existing residents within close proximity of the Site and future residents of the Proposed Development.

Sustainability and Energy

5.70 Policy ECC SP1 of the Local Plan states that developments will be supported that are located and appropriately designed to adapt to impact arising from climate change. In order to achieve this, development must be designed to take account of the following:

- Location (in relation to flood risk and vulnerability to coastal erosion);
- Water efficiency;
- Shade, cooling, ventilation, solar gain;
- Connectivity to the green infrastructure network;
- Layout and massing;
- Resilience of buildings and building materials to extreme weather events; and
- Capacity of drainage systems and incorporation of Sustainable urban Drainage Systems ("SuDS")

5.71 Policy ECC SP2 of the Local Plan outlines that all new residential developments will be expected to be energy efficient and demonstrate how they will:

- Achieve energy efficiency measure that reflect the current standards applicable at the time of submission;
- Use design and layout to promote energy efficiency; and
- Incorporate decentralised, renewable and low carbon energy supply systems, for examples small scale renewable energy systems such as solar panels.

5.72 The policy also outlines that all major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.

5.73 The Sustainability Statement and Energy Strategy which supports this Planning Application focuses on reducing the overall energy demands as far as practically possible through implementation of energy efficiency measures and the incorporation of low carbon or renewable energy technology.

5.74 The Sustainability Statement and Energy Strategy confirms that all the new dwellings comply with Part L1A 2013 of the Building Regulations as well as Part L 2021. The design of the Proposed Development surpasses any CO2 emission targets required for improvements over Part L1A 2013 of the Building Regulation Target Emission Rate in line with Policy ECC SP2 and producing the 10% of the total predicted energy requirements from renewable or low carbon energy generation on Site.

5.75 In Summary, the Sustainability Statement and Energy Strategy confirms that:

- The Proposed Development will be subject to Part L (Building Regulations) standards;
- The Proposed Development will be highly energy efficient, with all dwellings being gas free and supplying energy through a renewable energy source – Air Source Heat Pump;
- Preliminary calculations show that the Proposed Development will achieve a 59% reduction in carbon emissions. The Proposed Development demonstrates a carbon emission reduction of 42.99% over Part L 2013 baseline which surpasses relevant planning policy requirements;
- The proposed strategy for the Proposed Development delivers an exceptional ‘fabric first’ approach utilising highly efficient U-Values which surpass incoming Part L 2021 standards;
- The new dwellings will achieve a water efficiency standard of no more than 110l per person per day, in line with Policy W DM1;
- Low energy light fittings will be provided throughout; and
- New homes will include passive design measure to ensure the proposal meets the Approved Document Part O regarding overheating.

5.76 Additionally, the Sustainability Statement and Energy Strategy demonstrates how the Proposed Development contributes to minimising the CO2 emissions in accordance with the required hierarchy principles.

Drainage

5.77 Policy W DM3 of the Arun Local Plan sets out that all developments must identify opportunities to incorporate a range of SuDS appropriate to the size of the development at an early stage of the design process.

5.78 Proposals for major and minor developments must incorporate SuDS within the private areas of the development, including:

- Permeable driveways and parking;
- Soakaways; and
- Water harvesting and storage features including water butts.

5.79 Proposals for major developments must also integrate SuDS within public open spaces and roads, be integrated into the overall design of a development and must:

- Contribute positively to the appearance of the area, integrating access to allow maintenance of existing watercourses and the system;
- Effectively manage water (including its quality);
- Accommodate and enhance biodiversity by making connections to existing Green Infrastructure assets;

- Provide amenity for local residents (ensuring a safe environment);
- Retain the existing drainage network of the site and the wider area; and
- Be maintained in perpetuity, supported through a Maintenance and Management Plan/Regime, including its financing, agreed with the Local Planning Authority.

5.80 The Flood Risk Assessment and Sustainable Drainage Report supporting this Planning Application confirms that the Proposed Development will not increase the flood risk of the Site or that of neighbouring properties and it complies fully with the 2021 NPPF and NPPG.

Summary

5.81 This section sets out all relevant Development Plan policies and material considerations in respect of the Proposed Development and provides a considered assessment.

5.82 The Proposed Development will deliver a sustainable housing scheme of 21 new homes across a range of tenures and unit sizes appropriate for the local area.

5.83 The Proposed Development is considered to be acceptable in all respects and directly responds to the requirement of the Bersted Neighbourhood Plan to provide at least 20 homes on this Site.

6 Potential Obligations

6.1 This section considers potential Section 106 Agreement obligations / Heads of Terms and potential issues to be dealt with through a Section 278 Agreement. The position regarding Community Infrastructure Levy ("CIL") is also confirmed below.

S106 Heads of Terms

6.2 Arun District Council identifies that the following items will normally be included in a Section 106 Agreement if they cannot be provided under the CIL regime:

- Provision of affordable housing;
- Contribution for access management at Pagham Harbour;
- Provision for play and open space;
- Provision of / contribution to education;
- Provision of / contribution to libraries; and
- Provision for fire and rescue infrastructure.

6.3 All Section 106 contributions will be the subject of negotiation during the determination period following validation of this Planning Application.

CIL

6.4 Arun District Council adopted a CIL Charging Schedule in January 2020.

6.5 However, the Site falls within Zone 4 where no CIL charge is applicable for residential development.

S28 Agreement

6.6 The Proposed Development includes the enhancement of the existing Site access / egress from the public highway. These works include works on Highways Authority land. The Applicant therefore proposes to enter into a S278 Agreement with the Highways Authority following the grant of planning permission to confirm how these works will be undertaken.

7 Conclusion

- 7.1 This Planning Statement addresses the relevant planning considerations relating to the Proposed Development at the former Bartons Infant School site in North Bersted. The Planning Statement is one of a number of supporting documents which together justify the application proposals.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.3 This Planning Statement has demonstrated that the Proposed Development is in accordance with the Arun Local Plan and the Bersted Neighbourhood Plan and, in addition, there are material considerations which strongly support the grant of planning permission.
- 7.4 Importantly, the Proposed Development will deliver the following significant benefits:
- It will bring a vacant brownfield site back into beneficial use to the benefit of the community;
 - It will facilitate the delivery of 21 much needed homes that positively contribute to Arun's housing supply;
 - It provides a range of housing types appropriate for the needs of the local population;
 - It provides a high-quality green 'heart' as its centre-piece for use by all future residents of the Proposed Development;
 - It provides dedicated private amenity space in the form of private gardens;
 - It retains and enhances key ecological, biodiversity and landscaping features; and
 - It delivers a high quality, carefully considered design solution, refined throughout the pre-application process; and
- 7.5 For the reasons set out in this Planning Statement, planning permission should be granted for the Proposed Development.

Document 1

Note

KEY DEVELOPMENT PLAN POLICY

1.1 Relevant Development Plan policy broken down by topic is provided below.

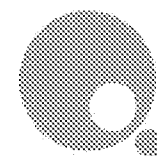
a) Arun Local Plan

Sustainable Development and Strategic Growth

1.2 Local Plan Policy SD SP1 states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

1.3 Policy SD SP1a outlines that to maintain the District's unique character as a coastal location set against the South Downs whilst ensuring that the needs of the community are met, the spatial strategy for ADC to 2031 is to;

- a) Promote and enable development which supports the main coastal towns of Bognor Regis and Littlehampton role as the main service, employment, retail and social centres including;
 - I. enabling development that supports Bognor Regis as a holiday centre and University Campus location, and
 - II. enabling development that supports Littlehampton as a civic centre with a harbour town set at the mouth of the river Arun with an expanding leisure, recreation and marine based economy
- b) Enable development that recognises the sustainable and historic character of the town of Arundel with its historic buildings set at the foot of the South Downs.
- c) Provide for growth of the sustainable villages whilst maintaining their setting within the open countryside.
- d) Provide for the economic needs of the community by allocating circa 75 hectares of employment land to meet the needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location and support the economic development of the coastal market area.
- e) Provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure as well as meeting the needs of the Gypsy and Travellers and Travelling Show people.
- f) Provide for development in the countryside area which reflects its character and role as the coastal plain, with green wedges separating urban areas, high quality agricultural land and environmental assets.



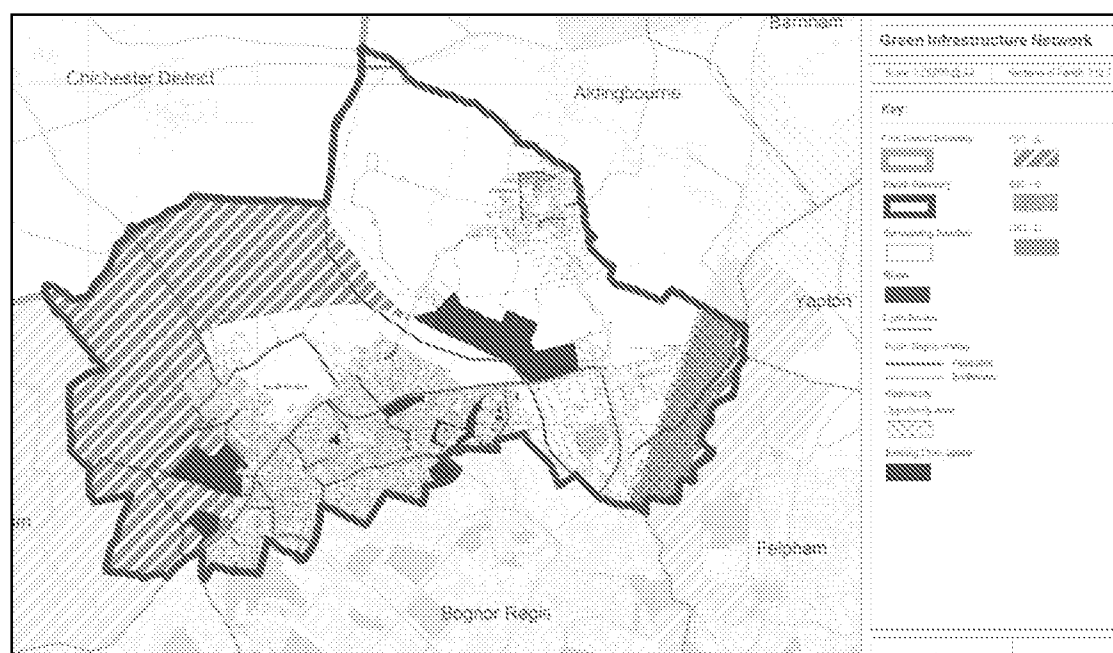
Note continued

- g) Encourage the effective use of previously developed land in accordance with the strategy, provided that it is not of high environmental value.
 - h) Support development which protects, conserves and enhances built heritage.
 - i) Monitor the delivery of the strategy and associated infrastructure with partners organisations, developers and landowners.
 - j) Ensure that development, particularly in the undeveloped areas of the District, takes account of the coastal topography to mitigate and adapt to climate change, especially in high risk flood areas.
 - k) Retain and enhance natural environment resources, including biodiversity.
- 1.4 Policy SD SP2 sets out that Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.
- 1.5 Policy C SP1 states that Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:
- a) for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan; or
 - b) for quiet, informal recreation; or
 - c) for green infrastructure; or
 - d) for the diversification of the rural economy; or
 - e) for road and/or cycle schemes; or
 - f) in accordance with other policies in the Plan which refer to a specific use or type of development.
- 1.6 To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.
- Green Infrastructure & Landscape**
- 1.7 The green infrastructure and landscape context of Arun District and the South Downs National Park is a particular characteristic of the area.
- 1.8 Policy GI SP1 requires that the existing Green Infrastructure Network for each parish and town be considered at an early stage of the design process – please see the relevant Green Network Map below.
- 1.9 The policy requires that all major development proposals be designed to protect and enhance existing Green Infrastructure and the connections between them in order to ensure a joined up Green Infrastructure Network. The Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected.

Note continued

1.10 The policy also requires that where compatible with nature conservation objectives development proposals must identify opportunities to connect existing Green Infrastructure assets with the coast, the South Downs National Park or the District's inland villages. Opportunities to enhance the Network should take into account of the multiple functions of Green Infrastructure assets.

Figure 1 - Bersted Parish Council Green Infrastructure Network Map



1.11 Policy LAN DM1 seeks to protect landscape character. Development within the setting of the South Downs National Park must have special regard to the conservation of that setting.

1.12 Elsewhere across the District development should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas.

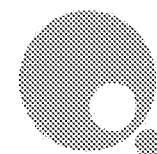
1.13 The historic character and development pattern of settlements within the District is also to be respected, taking account their distinct identity and setting.

Houssina

1.14 Policy H DM1 explains that for developments of 11 or more homes the Council will require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the latest SHMA.

1.15 The 2016 SHMA recommends the following market mix:

- * 1 Bedroom: 5-10%
- * 2 Bedroom: 40-45%
- * 3 Bedroom: 35-40%



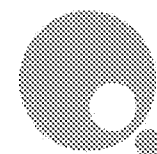
Note continued

- 4+ Bedroom: 10-15%

- 1.16 The policy explains that tenure mix will be negotiated on a case by case basis taking any necessary viability considerations into account.
- 1.17 Policy AH SP2 sets out the requirements for affordable housing. For developments of 11 or more homes a minimum 30% of the total number of units is to be provided on site as affordable housing.
- 1.18 The policy confirms that the provision of less than 30% on site, on an alternative site or by way of a commuted sum will only normally be allowed in very exceptional circumstances if supported by robust evidence including viability.
- 1.19 The policy states that the Council will negotiate from an initial position of 75% rent and 25% intermediate housing.
- 1.20 The policy requires that affordable housing be visually indistinguishable from market housing, with large groupings of single tenure dwelling types to be avoided, although affordable housing units will be permitted in small clusters throughout development schemes.
- 1.21 The affordable housing dwelling mix should comprise of the following range unless evidence indicates otherwise:
- 35-40% 1 bedroom;
 - 35-40% 2 bedrooms;
 - 15-20% 3 bedrooms; and
 - 5 -10% 4+ bedrooms.

Design

- 1.22 Policy D SP1 requires that all proposals should make efficient use of land but reflect the characterises of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.
- 1.23 Development proposals are to be derived from:
- A thorough site analysis and context appraisal;
 - Adherence to sustainable design objectives (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and
 - The influence of these objectives on the form of development.
- 1.24 Policy D DM1 considers matters relating to form and design quality. It states that when considering applications the Council will have regard to the following:
- Character – make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area;
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 - Impact – minimal impact to uses and occupiers of nearby properties/land;



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- Innovation – embrace innovative design, new technologies and construction techniques;
- Adaptability – buildings and places should be flexible to future adaption;
- Crime Prevention – achieve natural surveillance and make a clear division between private and public land;
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- Development should comply with the Arun Design Guide (see below).

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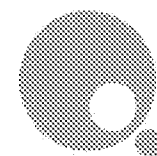
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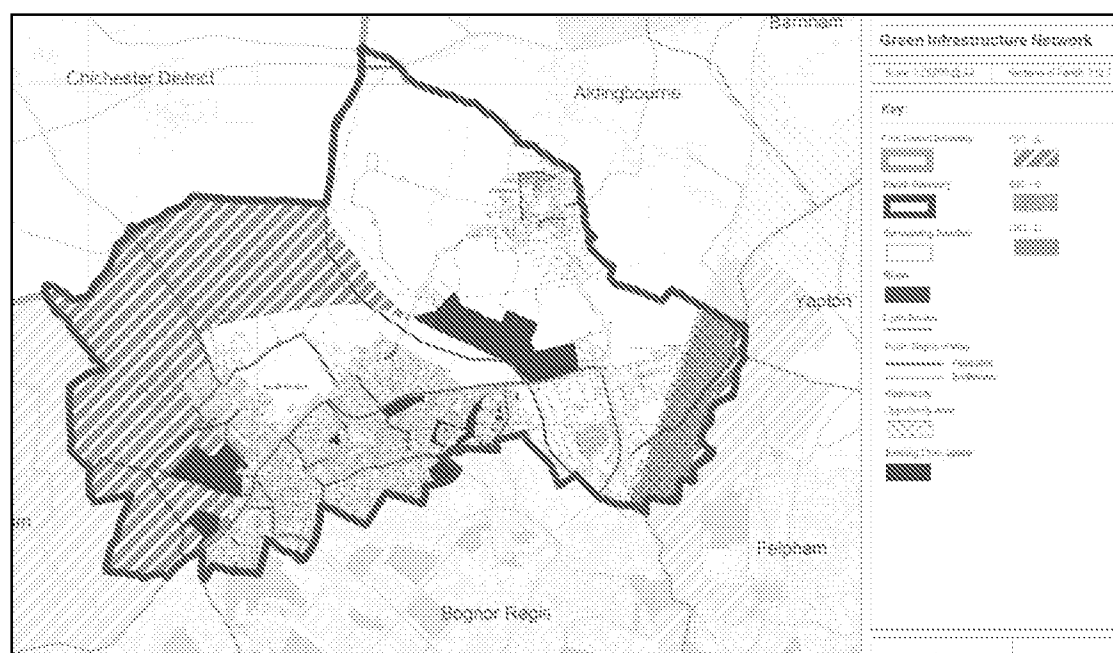
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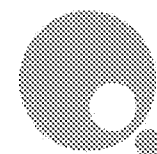
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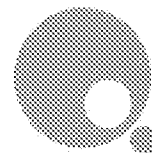
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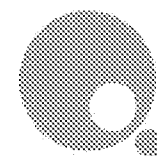
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- Resilience of buildings and materials to extreme weather events; and



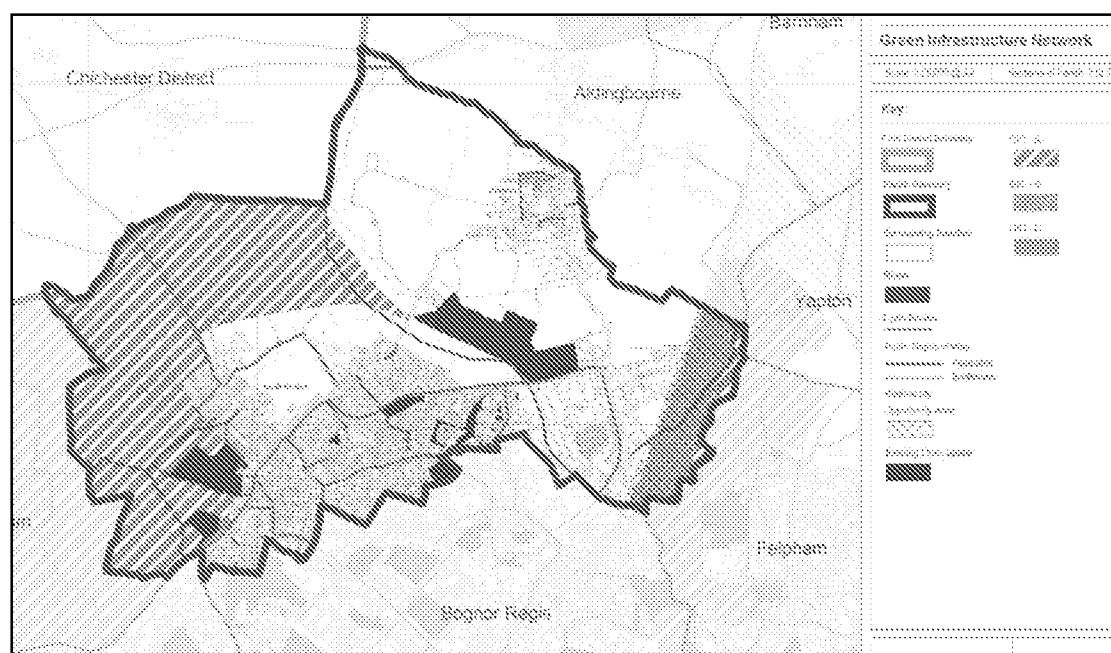
Note continued

- g) Encourage the effective use of previously developed land in accordance with the strategy, provided that it is not of high environmental value.
 - h) Support development which protects, conserves and enhances built heritage.
 - i) Monitor the delivery of the strategy and associated infrastructure with partners organisations, developers and landowners.
 - j) Ensure that development, particularly in the undeveloped areas of the District, takes account of the coastal topography to mitigate and adapt to climate change, especially in high risk flood areas.
 - k) Retain and enhance natural environment resources, including biodiversity.
- 1.4 Policy SD SP2 sets out that Built Up Area Boundaries are defined for the main towns and villages in the District and shown on the Policies Maps. Development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.
- 1.5 Policy C SP1 states that Outside the Built-Up Area Boundaries (as identified on the Policies Maps) land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:
- a) for the operational needs of agriculture, horticulture, forestry, the extraction of minerals or the management of waste as part of a waste site allocation within the West Sussex Waste Local Plan; or
 - b) for quiet, informal recreation; or
 - c) for green infrastructure; or
 - d) for the diversification of the rural economy; or
 - e) for road and/or cycle schemes; or
 - f) in accordance with other policies in the Plan which refer to a specific use or type of development.
- 1.6 To ensure better management of the rural-urban fringe in those areas where significant new development is proposed, early consideration will need to be given to landscape and biodiversity enhancement, woodland management, recreation provision and access routes.
- Green Infrastructure & Landscape**
- 1.7 The green infrastructure and landscape context of Arun District and the South Downs National Park is a particular characteristic of the area.
- 1.8 Policy GI SP1 requires that the existing Green Infrastructure Network for each parish and town be considered at an early stage of the design process – please see the relevant Green Network Map below.
- 1.9 The policy requires that all major development proposals be designed to protect and enhance existing Green Infrastructure and the connections between them in order to ensure a joined up Green Infrastructure Network. The Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected.

Note continued

1.10 The policy also requires that where compatible with nature conservation objectives development proposals must identify opportunities to connect existing Green Infrastructure assets with the coast, the South Downs National Park or the District's inland villages. Opportunities to enhance the Network should take into account of the multiple functions of Green Infrastructure assets.

Figure 1 - Bersted Parish Council Green Infrastructure Network Map



1.11 Policy LAN DM1 seeks to protect landscape character. Development within the setting of the South Downs National Park must have special regard to the conservation of that setting.

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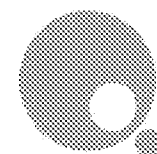
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1.14 Policy H DM1 explains that for developments of 11 or more homes the Council will require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the latest SHMA.

1.15 The 2016 SHMA recommends the following market mix:

- * 1 Bedroom: 5-10%
- * 2 Bedroom: 40-45%
- * 3 Bedroom: 35-40%



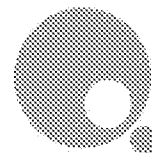
Note continued

- 4+ Bedroom: 10-15%

- 1.16 The policy explains that tenure mix will be negotiated on a case by case basis taking any necessary viability considerations into account.
- 1.17 Policy AH SP2 sets out the requirements for affordable housing. For developments of 11 or more homes a minimum 30% of the total number of units is to be provided on site as affordable housing.
- 1.18 The policy confirms that the provision of less than 30% on site, on an alternative site or by way of a commuted sum will only normally be allowed in very exceptional circumstances if supported by robust evidence including viability.
- 1.19 The policy states that the Council will negotiate from an initial position of 75% rent and 25% intermediate housing.
- 1.20 The policy requires that affordable housing be visually indistinguishable from market housing, with large groupings of single tenure dwelling types to be avoided, although affordable housing units will be permitted in small clusters throughout development schemes.
- 1.21 The affordable housing dwelling mix should comprise of the following range unless evidence indicates otherwise:
- 35-40% 1 bedroom;
 - 35-40% 2 bedrooms;
 - 15-20% 3 bedrooms; and
 - 5 -10% 4+ bedrooms.

Design

- 1.22 Policy D SP1 requires that all proposals should make efficient use of land but reflect the characterises of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.
- 1.23 Development proposals are to be derived from:
- A thorough site analysis and context appraisal;
 - Adherence to sustainable design objectives (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and
 - The influence of these objectives on the form of development.
- 1.24 Policy D DM1 considers matters relating to form and design quality. It states that when considering applications the Council will have regard to the following:
- Character – make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area;
 - Appearance/ Attractiveness – demonstrate a high standard of architectural principles, building materials and hard and soft landscaping;
 - Impact – minimal impact to uses and occupiers of nearby properties/land;



Note continued

- Capacity of drainage systems and inclusion of SuDS.

1.28 Policy ECC SP2 expects that all new residential developments be energy efficient and demonstrate how they will:

- Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
- Use design and layout to promote energy efficient; and
- Incorporate decentralised, renewable and low carbon energy supply systems.

1.29 All major developments must produce 10% of total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that it is unviable. The policy notes that the Council will consider 'allowable solutions' where it is clearly demonstrated that the provision of on site renewable or low carbon energy generation is unviable or not feasible.

1.30 Policy QE SP1 requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact on residential amenity, the natural environment or upon leisure and recreation activities enjoyed by residents.

1.31 Policy QE DM2 requires proposals involving outdoor lighting to accord with the latest national design guidance and British Standards, having regard to a number of defined local criteria.

1.32 Policy QE DM3 confirms that all major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts by:

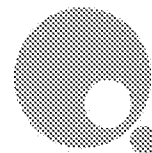
- a) Ensuring the development is located within easy reach of established public transport services;
- b) Maximising provision for cycling and pedestrian facilities;
- c) Encouraging the use of cleaner transport fuels on site, through the inclusion of electric car charging points; and
- d) Contributing towards the improvement of the highway network where the development is predicted to result in increased congestion on the highway network.

Transport

1.33 Policy T SP1 confirms that the Council will ensure that development:

- Provides safe access onto the highway network;
- Contributes to highway improvements; and
- Promotes sustainable transport.

1.34 The policy states that the Council will support development which is designed to reduce the need to travel by car, gives priority to walking and cycling, incorporates appropriate levels of car parking in line with West Sussex County Council guidance and the Arun Design Guide, and incorporates facilities for charging electric and hybrid vehicles (unless evidence of market demand and viability are provided).



Note continued

- 1.35 Policy T DM1 requires that new development prioritise ease of movement for pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services. Proposals are to make provision for cycling facilities to meet West Sussex County Council standards – albeit an Arun SPD was adopted in 2020 as described later in this note.
- 1.36 Policy T DM3 Sets out that to ensure improvements necessary to enhance the strategic and supporting road network within the District can be carried out, the lines of major road schemes, as shown on the Policies Map, will be protected from development as follows:
- a) A259 Comet Corner (Middleton)
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Natural Environment

- 1.37 Policy ENV SP1 confirms that Arun District Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environments through the development process.
- 1.38 Policy ENV DM1 states that development which is likely to have an adverse effect on designated features of Biodiversity or Geological Importance (eg Pagham Harbour) will not normally be permitted. Development on wildlife sites with the highest value will only be permitted exceptionally where the following can be demonstrated:
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- 1.39 The policy is clear that the presumption in favour of sustainable development does not apply where development requiring an appropriate assessment is being considered, planned or determined.
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- The status of the designation;
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Note

KEY DEVELOPMENT PLAN POLICY

1.1 Relevant Development Plan policy broken down by topic is provided below.

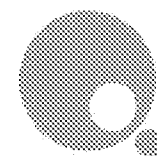
a) Arun Local Plan

Sustainable Development and Strategic Growth

1.2 Local Plan Policy SD SP1 states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements (both coastal and inland).

1.3 Policy SD SP1a outlines that to maintain the District's unique character as a coastal location set against the South Downs whilst ensuring that the needs of the community are met, the spatial strategy for ADC to 2031 is to;

- a) Promote and enable development which supports the main coastal towns of Bognor Regis and Littlehampton role as the main service, employment, retail and social centres including;
 - I. enabling development that supports Bognor Regis as a holiday centre and University Campus location, and
 - II. enabling development that supports Littlehampton as a civic centre with a harbour town set at the mouth of the river Arun with an expanding leisure, recreation and marine based economy
- b) Enable development that recognises the sustainable and historic character of the town of Arundel with its historic buildings set at the foot of the South Downs.
- c) Provide for growth of the sustainable villages whilst maintaining their setting within the open countryside.
- d) Provide for the economic needs of the community by allocating circa 75 hectares of employment land to meet the needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location and support the economic development of the coastal market area.
- e) Provide for the housing needs of the community by delivering 20,000 homes of an appropriate scale and tenure as well as meeting the needs of the Gypsy and Travellers and Travelling Show people.
- f) Provide for development in the countryside area which reflects its character and role as the coastal plain, with green wedges separating urban areas, high quality agricultural land and environmental assets.



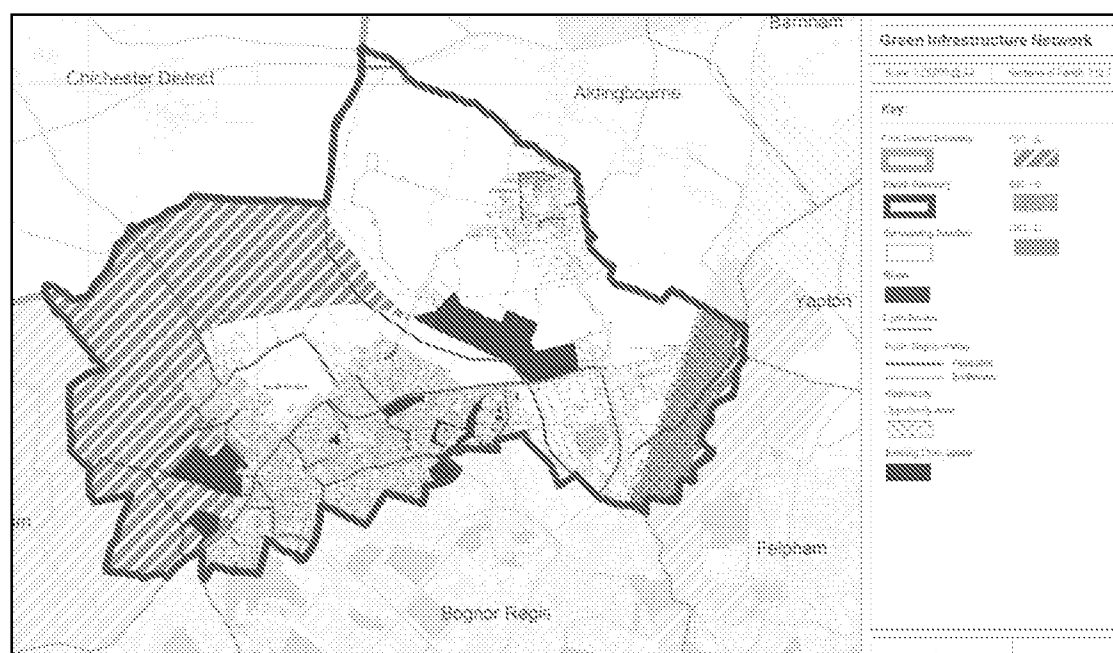
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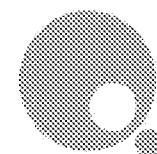
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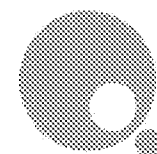
Note continued

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 - The influence of these objectives on the form of development.
- 1.24 Policy D DM1 considers matters relating to form and design quality. It states that when considering applications the Council will have regard to the following:
- Character – make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area;
 - Appearance/ Attractiveness – demonstrate a high standard of architectural principles, building materials and hard and soft landscaping;
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Note continued

- Innovation – embrace innovative design, new technologies and construction techniques;
- Adaptability – buildings and places should be flexible to future adaption;
- Crime Prevention – achieve natural surveillance and make a clear division between private and public land;
- Trees and Woodland – incorporate existing and new tree planting;
- Solar Gain – maximise sunlight and passive solar energy;
- Public Realm – provide or enhance layouts, streets and public spaces that are attractive, socially inclusive, safe and secure and adaptable, with appropriate planting, street furniture and bike storage;
- Layout (Movement) – create an integrated network of walking and cycling routes;
- Layout (Legibility) – deliver ease of navigation through focal points and/or public realm variety;
- Public Art – incorporate where there is capacity to do so, which may involve building design, landscaping, street furniture, signage, lighting etc
- Density – make efficient use of land whilst providing a mix of dwelling types, and maintain character and local distinctiveness. Higher densities are more appropriate in the most accessible locations;
- Scale – be within the general confines of the overall character of the locality, unless it can be demonstrated that the contrary would bring a substantial visual improvement;
- Development should comply with the Arun Design Guide (see below).

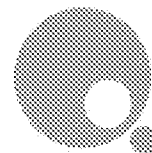
1.25 Policy D DM2 confirms that the Council will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs, as set out in Nationally Described Space Standards.

1.26 The supporting text to this policy explains that external space standards are set out in the Arun Design Guide.

Sustainability

1.27 Policy ECC SP1 states that developments will be supported that are located and appropriately designed to adapt to impacts arising from climate change. Developments must take into account the following:

- Location;
- Water efficiency;
- Shade, cooling, ventilation and solar gain;
- Connectivity to the green infrastructure network;
- Layout and massing;
- Resilience of buildings and materials to extreme weather events; and



Note continued

- Capacity of drainage systems and inclusion of SuDS.

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- Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
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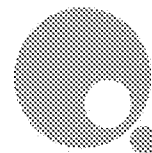
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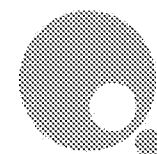


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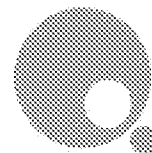
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- The status of the designation;
 - The nature and quality of the site features;
 - Extent of any adverse impact;
 - The need for compensatory measures.



Note continued

- 1.41 Policy ENV DM2 deals specifically with Pagham Harbour Special Protection Area. The Site falls within Zone B - being within 5km of the asset - where development will be required to:
- Make developer contributions towards the agreed strategic approach to access management;
 - Create easily accessible new green spaces for recreation within or adjacent to the development site
- 1.42 Policy ENV DM3 requires development to retain and sympathetically incorporate valued and important habitats and be designed to minimise disturbance.
- 1.43 Policy ENV DM5 states that development should seek to achieve a net gain in biodiversity (no percentage is specified) and protect existing habitat on site. Proposals should also incorporate elements of biodiversity including green walls, roofs, bats and bird boxes as well as landscape features minimising adverse impacts on existing habitats.
- 1.44 Policy W SP1 encourages water efficiency measures and actively using surface water as a design feature.
- 1.45 Policy W DM1 deals with water supply and quality. Development will be permitted where sufficient water supplies can be provided and provision of water supply is not considered
- 1.46 detrimental to existing abstractions, river flows and water quality. Development must include measures that meet 110 l/person/day.
- 1.47 All major developments must illustrate how they have contributed to the protection and enhancement of water bodies identified in the South East River Basin Management Plan, and demonstrate, where it will materially increase foul and/or surface water discharges, adequate drainage capacity.
- 1.48 Furthermore, major development in the Lidsey Wastewater Treatment Works Catchment Area (which applies to the Site) must be accompanied by a Drainage Impact Assessment.
- 1.49 Policy W DM3 states that developments must identify opportunities to incorporate a range of SuDS appropriate to the size of the development. Proposals for major developments must integrate SuDS within private areas of the development, as well as within public open spaces and roads.
- 1.50 In order to ensure SuDS discharge water from development at the same or lesser rate as prior to construction, developers must:
- Follow the SuDS hierarchy;
 - Undertake 6 months of groundwater monitoring within the winter period;
 - Undertake winter percolation testing;
 - Ensure no flooding in the 1 in 30 year event;
 - Take account of the 1 in 100 year event plus 30% allowance for climate change.



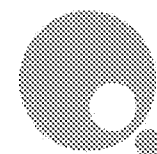
Note continued

Other

- 1.51 Policy SKILLS SPI explains that the Council will encourage development proposals that support raising skill levels, tackling skills shortages and addressing barriers to employment for economically inactive people.
- 1.52 The policy requires Employment and Skills plans for the construction phases of residential development of more than 50 homes.
- 1.53 Policy TEL SP1 requires new proposals for residential development to be designed to be connected to high quality communications infrastructure to ensure that fibre optic or other cabling does not need to be retrofitted, with viability or technical evidence provided where this is not possible.
- 1.54 Policy HWB SP1 requires all development to maximise its impact in promoting healthy communities and reducing health inequalities.
- 1.55 Policy OSR DM1 states that existing community facilities should not be built on or redeveloped unless:
- A robust and up to date assessment has been undertaken which shows the facilities to be surplus to requirements; or
 - The loss would be replaced by equivalent or better provision; or
 - The development is for an alternative community provision, the need for which outweighs the loss.
- 1.56 Policy WM DM1 covers waste management and states that proposals which cost over £300,000 must identify the volume and type of materials to be demolished and/or excavated, with opportunities for re-use and recovery of materials on site being demonstrated.
- 1.57 New residential development to be designed to enable kerbside collection from municipal waste vehicles, and where appropriate provide communal recycling is and safe bin storage for flats.
- 1.58 Policy INF SP2 identifies the need for a new secondary school to support the growth requirements of the District. All development that generates a need for secondary school places where there is an identified deficit of places is required to make an appropriate financial contribution.

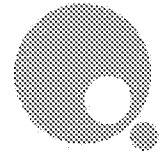
b) Bersted Neighbourhood Plan

- 1.59 The Bersted Neighbourhood Plan was adopted in November 2014.
- 1.60 Policy ES1 requires new development that would have an effect on the appearance or character of the surrounding area to be of a high-quality design and should contribute to local character by creating a sense of place.
- 1.61 Policy ES2 requires that new development aims to reduce the overall level of flood risk by incorporating SuDS features.
- 1.62 Policy ES5 states that the design of new buildings should contribute positively to the historic character of the area.



Note continued

- 1.63 Policy ES6 states that development that damages or results in the loss of ancient trees/trees of arboricultural and amenity value or loss of significant ground cover and habitat will be resisted. Proposals should be accompanied by a tree survey that establishes the health and longevity of any affected trees and a management plan to demonstrate how they will be so maintained.
- 1.64 Policy ES7 outlines that development outside of the built-up area boundary, development or redevelopment will not be supported.
- 1.65 Policy GA1 confirms that support will be given to proposals which would increase or improve the network of footpaths, footways and cycleways either by making land available for that purpose or by means of any financial contributions through legal agreements or CIL.
- 1.66 Policy HDQ1 explains that permission will be granted on the Site for a minimum of 20 new homes provided that the design meets the policies set out in this plan and the Local Plan.
- 1.67 Policy HDQ2 sets out that proposals for new housing must ensure that the new homes are well connected to, and visually integrated with, the surrounding area.
- 1.68 Policy HDQ4 outlines that proposals for new housing must deliver a range of house types and tenures, with applications expected to provide a Bersted-specific dwelling mix and affordable housing strategy clearly demonstrating how the development addresses current and future needs.
- 1.69 Policy HDQ5 states that proposals for new housing must be of high quality and designed to reflect the local character.
- 1.70 Policy HDQ6 requires that a private outdoor garden amenity space or shared amenity space must be provided for all new dwellings
- 1.71 Policy HDQ7 states that the following items must be considered early in the design process and integrated into the overall scheme:
- Bin stores and recycling facilities
 - Cycle stores
 - Meter boxes
 - Lighting
 - Flues and ventilation ducts
 - Satellite dishes and telephone lines
 - Gutter and pipes
- 1.72 Policy HDQ8 sets out that proposals for new development will have adequate onsite parking to meet current and future needs at a minimum rate of two spaces per dwelling unless alternative and accessible car parking arrangements can be made which do not add to on-street congestion. Development which removes of road parking will not be supported unless alternative provision is made which increases or maintains the number of parking spaces.



Note continued

- 1.73 Policy HDQ8 outlines that proposals should provide a minimum of 2 spaces per dwelling unless alternative and accessible car parking spaces can be made available which do not add to on-street congestion.

Document 2



North Bersted			Gross Internal Area	
Plot number	Unit Type	Tenure	GIA (sqm)	GIA (sqft)
Plot 1	2B4P	Affordable	83.9	903.3
Plot 2	2B4P	Affordable	83.9	903.3
Plot 3	3B4P	Affordable	90.7	976.3
Plot 4	2B4P	Private	83.9	903.3
Plot 5	2B4P	Private	83.9	903.3
Plot 6	2B4P	Affordable	83.9	903.3
Plot 7	2B4P	Affordable	83.9	903.3
Plot 8	2B3P	Private	72.9	785.1
Plot 9	2B3P	Private	72.9	785.1
Plot 10	2B3P	Private	72.9	785.1
Plot 11	2B3P	Private	72.9	785.1
Plot 12	2B3P	Private	72.9	785.1
Plot 13	2B3P	Private	72.9	785.1
Plot 14	3B4P+	Private	94.3	1014.6
Plot 15	4B6P	Private	131.1	1410.9
Plot 16	3B4P+	Private	94.3	1014.6
Plot 17	3B4P+	Private	94.3	1014.6
Plot 18	3B4P+	Private	94.3	1014.6
Plot 19	3B4P+	Private	94.3	1014.6
Plot 20	3B4P+	Affordable	94.3	1014.6
Plot 21	3B4P+	Private	94.3	1014.6
			1822.7	19619.4

Document 3

Former Bartons Infant School, North Bersted Vacant Building Credit Supporting Statement

- 1.1 The Applicant is seeking to obtain Vacant Building Credit ("VBC") in respect of the Proposed Development at the Site.
- 1.2 The Applicant will look to discuss the content of this supporting statement with Arun District Council's Housing Delivery Team and Planning Team following validation of the Planning Application.

Background

- 1.3 VBC was introduced through a written ministerial statement and the NPPG in November 2014 to provide an incentive for brownfield development on sites containing vacant buildings.
- 1.4 The introduction of VBC was successfully challenged in the High Court (July 2015) and subsequently removed from the NPPG. The Government challenged the quashing and, on 11 May 2016, the Court of Appeal upheld their challenge reinstating the VBC requirement. The NPPG was updated on 19 May 2016 to reflect the restoration. More recently VBC has been added to the NPPF.
- 1.5 Paragraph 026 (Reference ID: 23b-026-20190315) of the NPPG identifies that:

National policy provides an incentive for brownfield development on sites containing vacant buildings. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace. (Our emphasis)

- 1.6 Paragraph 64 of the NPPF (July 2021) states:

64. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount (30)

(30) Equivalent to the existing gross floorspace of the existing buildings. This does not apply to vacant buildings which have been abandoned. (Our emphasis)

Process of Determining VBC

- 1.7 Paragraph 027 (Reference ID: 23b-027-20190315) of the NPPG outlines:

Where there is an overall increase in floorspace in the proposed development, the local planning authority should calculate the amount of affordable housing contributions required from the development as set out in their Local Plan. A 'credit' should then be applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use or demolished as part of the scheme and deducted from the overall affordable housing contribution calculation. This will apply in calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided. (Our emphasis)

Former Bartons Infant School, North Bersted Vacant Building Credit Supporting Statement

1.8 Therefore, the existing floorspace of a vacant building should be credited against the floorspace of the new development.

1.9 The NPPG confirms that VBC applies where the existing building has not been abandoned. Paragraph 028 (Reference ID: 23b-028-20190315) identifies:

The courts have held that, in deciding whether a use has been abandoned, account should be taken of all relevant circumstances, such as:

- * the condition of the property*
- * the period of non-use*
- * whether there is an intervening use; and*
- * any evidence regarding the owner's intention*

Each case is a matter for the collecting authority to judge.

The policy is intended to incentivise brownfield development, including the reuse or redevelopment of empty and redundant buildings. In considering how the vacant building credit should apply to a particular development, local planning authorities should have regard to the intention of national policy.

In doing so, it may be appropriate for authorities to consider:

- * whether the building has been made vacant for the sole purposes of re-development*
- * whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development.*

1.10 Each of these potentially relevant factors is directed at ensuring that site promoters do not deliberately purchase a building and let it run to neglect, or by seeking to reduce affordable housing contributions notwithstanding an existing planning permission with a full affordable housing complement. This is clearly not the case for the Site.

Interpretation of NPPG at the Site

Affordable Housing Requirement

1.11 The NPPG sets out the formula for calculating VBC at Paragraph 027. This confirms:

(Difference between proposed and existing floorspace / proposed floorspace) x policy requirement

1.12 In this case of the Site, the floorspace of the existing school building measures 1,112sqm GEA, whilst the Proposed Development measures 2,246sqm GEA. Therefore, applying the formula, the following is relevant:

$$(2,246\text{sqm} - 1,112\text{sqm}) / 2,246\text{sqm} * 30 = 15.1\%$$

1.13 Based on the NPPG formula, the requirement would be for 15.1% affordable housing (equating to 3.17 units) when the VBC is applied.

Former Bartons Infant School, North Bersted Vacant Building Credit Supporting Statement

Consideration of Abandonment

- 1.14 As set out in the NPPG, VBC can only be applied where the existing building has not been abandoned.
- 1.15 Paragraph 028 of the NPPG sets out four considerations (or criteria) to be met to ensure that an abandonment case can be made. Consideration against these four points is provided below:

Abandonment Criteria (NPPG Part 028)	Site Considerations
The condition of the property	The Applicant can confirm that the existing building on Site is not in a complete state of disrepair. The building is vacated but accessible, it is watertight and main services are connected and live. The existing building is considered occupiable if necessary (please see owner's intentions below). An inspection of the existing building would be accommodated if deemed useful.
The period of non-use	The Site became vacant in 2014 when the school vacated the premises. The building was not abandoned. A purpose-built school was commissioned by the County Council for expansion purposes. The former Bartons Infant School simply could not accommodate the number of pupils required for the area. This decision for a new school was taken by the West Sussex Education Authority. Please see notes below on owner's intentions.
Whether there is an intervening use	There has been no intervening use at the Site since the existing building became vacant.
Any evidence regarding the owner's intention	Following essential relocation of the former Bartons Infant School a review of possible uses for the building and Site was undertaken. It was recognised that this is not an area suitable for commercial premises, nor was a need deemed identified for such premises.

Former Bartons Infant School, North Bersted Vacant Building Credit Supporting Statement

	As well as consideration for residential delivery the Site and building has been kept in reserve for potential administrative uses and other support services at the County Council. For example, it was reserved to host the Coroners inquest of the Shoreham Air disaster but was subsequently not required. Since 2014, WSCC has sought to redevelop the Site, most recently in line with its housing allocation in the Bersted Neighbourhood Plan, an approach which is supported by the Local District and Parish Councillors. The Site has not been advertised on the open market, a key decision was taken that it should be developed through the West Sussex Joint Venture Partnership LLP.
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- 1.16 In the context of the above, in particular in the case of property condition and site owner's intention, it is considered that the existing building has not been abandoned.
- 1.17 Paragraph 028 of the NPPG sets out additional considerations which *may* be relevant to VBC. However, in response, it can be confirmed that:
- The Site has not been made vacant for the sole purposes of re-development; and
 - There are no extant or recently expired consents relevant to the Site.

Arun District Council's Approach to VBC

- 1.18 Arun District Council does not have any specific guidance in respect of VBC.
- 1.19 However, local plan policy specifically referring to VBC is not required by a local planning authority to be able to confirm a VBC in respect of a particular development. The NPPF and the NPPG both include reference to VBC and these are both material considerations of significant weight in the determination of planning applications.
- 1.20 The Applicant has discussed the ability of utilising VBC in respect of the Proposed Development with Arun District Council's Planning Team prior to submission of this application. During these discussions officers have indicated that the Council would accept and determine an application to apply the credit.

Summary

- 1.21 VBC was introduced in 2014 to provide an incentive for brownfield development on sites containing vacant buildings (such as the Site).
- 1.22 When the formula is applied to the Site, based on the NPPG calculation, the requirement would be for 15.1% affordable housing (equating to 3.17 units).

Former Bartons Infant School, North Bersted Vacant Building Credit Supporting Statement

- 1.23 VBC can only be applied where the existing building has not been abandoned. As demonstrated above, particularly in the case of the building's condition and the site owner's intention for the building, it is considered that the existing building at the Site has not been abandoned.
- 1.24 Arun District Council has no set position on the application of VBC, however national planning guidance dictates that this does not prevent a local planning authority from being able to confirm VBC.
- 1.25 With the above in mind, the Site meets the relevant tests to allow VBC to be applied, in turn reducing the affordable housing requirement to 15.1% affordable housing (equating to 3.17 units).