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**From:** Simon Davis  
**Sent:** 11 June 2021 17:18  
**To:** Adrian D'Cruz [REDACTED]  
**Subject:** RE: BR/124/21/OUT

Dear Adrian,

Thanks for this. However, it doesn't refer to the exceptions test / sustainability benefits to the community as I thought you had suggested it did so I don't see it as being particularly helpful in this matter. Note that I had planned on recommending the application for approval without sight of the DAS until I realised that information was missing in respect of the flood risk tests so the submission of the DAS as it stands does not assist with the application.

Regarding the sequential test, I can confirm that no sequential assessment was carried out in respect of the previous application and therefore one does need to be provided. In respect to your questions, I have discussed with Daniel Vick and offer the following:

1. The search area for alternative sites

We would suggest searching within the Built Up Area Boundary of the wider Bognor Regis Area (so from Pagham in the west to Middleton in the east and up as far as Bersted). You can view the BUAB on the Local Plan.

2. Any sites within the search area that have already been allocated similar to our proposal (I assume there are none allocated of the scale we are proposing?)

All of the Local Plan allocations are for very large sites however, please review the following Neighbourhood Plans as they may contain small site allocations – Bognor Regis, Felpham, Bersted. There are no NPs for Pagham, Aldwick, Middleton.

3. Any sites in the search area that have been given planning permission (and not built) similar to our proposals

Please use the planning search function on our website or you could instruct an experienced site searcher to do this for you (i.e. there are professional out there who have expertise in preparing sequential assessments).

4. Any 'windfall sites' that may be suitable for our proposal

As per 3.

Even if you are able to amend the DAS to refer to the test and produce a Sequential Site Assessment, the application expires in 2 weeks and we are not willing to agree an extension of time. Further, if we were to recommend approval then this must go to the Planning Committee with the next one being at the end of July.

We will therefore be making a decision on or before the 28<sup>th</sup> June based on the application as it currently stands i.e. we will not be accepting further submissions at this late stage. If you don't want to receive a refusal then I would suggest that you withdraw the application and then prepare the sequential before you resubmit the application.

Kind Regards

**Simon J Davis MRTPI**  
Principal Planning Officer  
Directorate of Place

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**From:** Adrian D'Cruz [REDACTED]  
**Sent:** 11 June 2021 13:26  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Subject:** BR/124/21/OUT

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Dear Simon,

Further to our conversation earlier please find attached DAS.  
Apologies, but this appears to have been omitted from the original submission and since it is not required for validation this was not flagged earlier.  
You will note the DAS has a policy section which will deal with 'Part 1' of the 'Exception Test'

Best regards

Adrian

Adrian D'Cruz  
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