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CONSULTANCY LIMITED

PLANNING SUPPORT STATEMENT

In relation to:

‘Erection of a new building comprising 3 no. flats (2 x 2-bed and 1 x 1-bed), including alterations to the fenestration of existing Ravenna House’

**Ravenna House, Richmond Avenue West,
Bognor Regis, West Sussex PO21 2YG**

July 2020

PLANNING STATEMENT

Ravenna House, Richmond Avenue West, Bognor Regis

I. INTRODUCTION

- 1.1 This planning application proposes the erection of a new 2½ storey detached building to the south side of existing Ravenna House. This new building will provide 3 individual flats, comprising 2 x 2-bed units, and 1 x 1-bed unit. The development will be provided with communal outside amenity space, together with refuse and cycle storage.
- 1.2 The planning application is submitted on behalf of the landowner, Mr R Heagarty.
- 1.3 This Planning Statement is submitted in support of the above planning application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal in light of the relevant policies and all other material planning considerations.
- 1.4 This statement should be read in conjunction with the submitted drawings, which have been prepared by ADM Architects.



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2. SITE CONTEXT

- 2.1 Ravenna House is located on a spacious corner plot, adjoining Richmond Avenue to the north and Richmond Avenue West to the west side. The site area is 844m².
- 2.2 The rear of the site backs on to an access and parking area, with a flatted development known as Canberra Court behind. The south of the site backs onto residential gardens of properties on Aldwick Road. There is also an electric substation to the southern boundary of the site.



Fig 1. Aerial map showing the site and its surroundings (*courtesy of Promap*)



- 2.3 Ravenna House itself comprises a two-and-a-half storey detached building. In terms of materials, it consists of red brick walling at ground floor level, with speckled render above. The roof is tiled, with a modest sized pitched roof dormer to the front elevation.
- 2.4 In terms of the sites designations, according to the Arun District Local Plan Policy Map (see **Fig 2**), Ravenna House is located within the defined built-up area boundary for Bognor Regis, where the principle of new development is generally accepted subject to other policies in the development plan. The site is also identified as being within the Pagham Harbour Buffer Zone B (5km Buffer). To our knowledge, no other restrictions or constraints relate to the site.

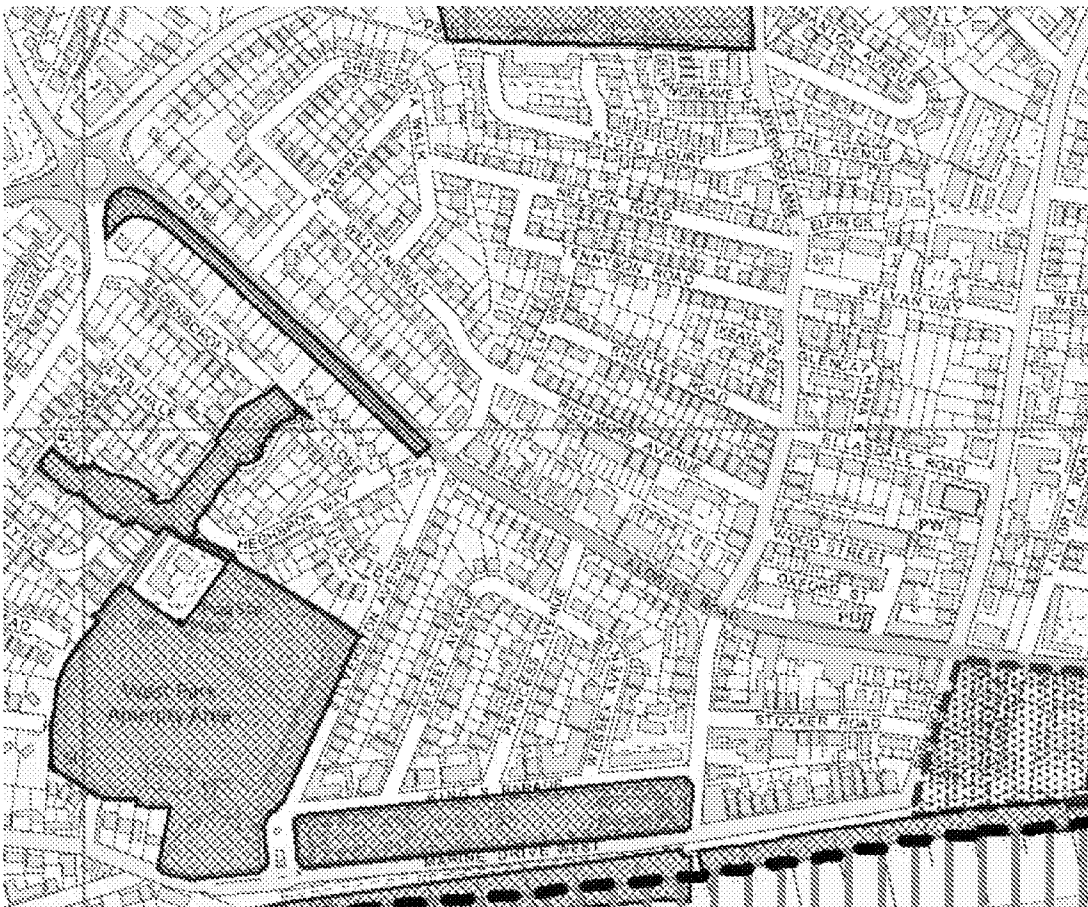
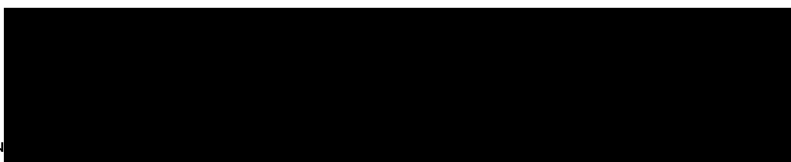


Fig 2. Extract from Arun District LP Policy Map 3. Bognor Regis & Surrounding Area





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- 2.5 As identified by the DEFRA 'Magic Map', there are no Listed Buildings within the immediate vicinity of the site. Finally, according to the Environment Agency's flood maps, the site is located within Flood Zone 1, where land and property have a '*low probability of flooding*'.



Fig 3. Extract from The Environment Agency's Flood Maps for Planning



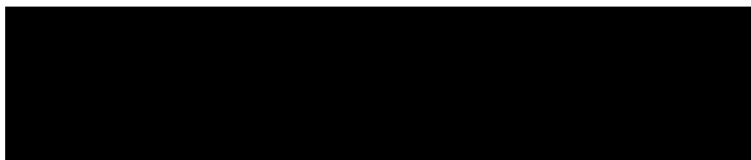


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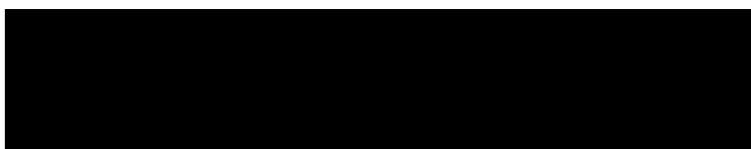
3. PLANNING POLICY CONTEXT

(i) National Planning Policy Framework (NPPF)

- 3.1 The National Planning Policy Framework (NPPF) was originally published in 2012, with a revised version published in July 2018. A further updated version of the NPPF was published in February 2019, comprising only minor alterations to the 2018 publication.
- 3.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 3.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *“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”* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)”*. These objectives are economic, social and environmental, which *“should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area”* (paragraph 9).



- 3.4 Paragraph 11 is an important element of the NPPF. It states that: *“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”.*
- 3.5 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”*
- 3.6 Section 4 of the Plan refers to Decision Making. At paragraph 38 of the Framework, it sets out that *“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should... work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. **Decision-makers at every level should seek to approve applications for sustainable development where possible.**”*
- 3.7 Section 5 relates to delivering housing. It reiterates at paragraph 59 that the Government’s objective is to significantly boost the supply of new homes. Paragraph 63 confirms that non-major development schemes should not have to provide



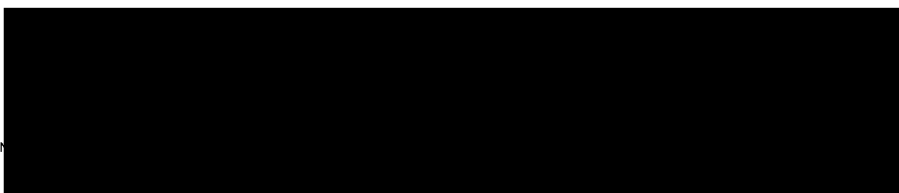
affordable housing (although a lower threshold is applicable in designated rural areas). Paragraph 68 identifies the important role small and medium sized sites can make to meeting the housing supply of an area. It states that local planning authorities should *“support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes...”*.

- 3.8 At paragraph 73 the NPPF sets out that *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”*. The Framework also clarifies that *“a five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement”*.
- 3.9 Section 9 discusses sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 3.10 Paragraph 105 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.”*
- 3.11 Paragraph 108 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide: *“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable*



access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

- 3.12 At paragraph 109 the Framework also confirms that *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 3.13 Section 11 is entitled 'Making effective use of land'. Paragraph 117 confirms that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"*.
- 3.14 Section 12 refers to achieving good design. Paragraph 124 states *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development..."*
- 3.15 Paragraph 127 sets out that *"decisions should ensure that developments:*
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*



- e. *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f. *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

3.16 Paragraph 130 confirms that *"where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development,"* whilst paragraph 131 sets out that *"in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings."*

3.17 Further parts of the Framework that are of particular note include Section 14, which relates to matters of climate change, and flooding; and Section 15, which refers to the desire for development to contribute to and enhance the natural and local environment.

(ii) The Arun Local Plan 2011 – 2031

3.18 The Arun Local Plan 2011 – 2031 was adopted by resolution of Full Council on 18th July 2018. It comprises a written statement and supporting policy maps 1-4. The plan sets out a spatial vision, objectives and a sustainable strategy for delivering the needed growth of the District over the period 2011 – 2031. This plan replaces the Arun Local Plan 2003 and the saved policies within it and now provides the most up-to-date policy guidance for the District.

3.19 As identified on **Fig 2**, the Application Site is located within the built up area boundary for Bognor Regis, where in accordance with **Policy SD SP2** (Built up Area

Boundary), development should be focused, subject to consideration against other policies of the Local Plan.

3.20 The following policies are considered to be of relevance to this proposal:-

3.21 **Policy SD SP1** is a general policy, which relates to Sustainable development. It 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). This presumption will not be applicable where development requires an Appropriate Assessment or where consideration of the need for one is being undertaken”*.

3.22 **Policies H SP1 and H DM1** are general policies, which relate to The Housing Requirement and Housing Mix respectively. The District is required to provide at least 20,000 new homes over the plan period (up to 2031). This requirement is to be met by a number of strategic allocations as set out in the Local Plan, windfalls, and additional non-strategic allocations that will be made across the District through emerging Neighbourhood Plans and the production of a subsequent Non-Strategic Site Allocations Development Plan Document (DPD). The supporting text to **Policy H DM1** confirms that *“requirements vary across the District and factors such as proximity to public transport and services, place and site characteristics will determine what is a suitable dwelling mix at any particular location... The Council is keen to promote growth and deliver development that reflects the demand and profile of households in the District”*.

- 3.23 **Policy H SP4** refers specifically to Houses in multiple occupation. It states that *“where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where the proposals contribute to the creation of sustainable, inclusive and mixed communities and meet the following criteria:*
- a. Do not adversely affect the character of the area including eroding the balance between different types of housing, including family housing;*
 - b. Do not contribute to the generation of excessive parking demands or traffic in an area;*
 - c. Provide adequate areas of open space”.*
- 3.24 **Policy D SP1** refers to Design. It states that *“all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development. With major developments (as defined in the GDPO 1995 (as amended(41)) or allocated sites in the Development Plan. In addition to a Design and Access Statement, a context appraisal, context plan and analysis of the site will also be required”.*
- 3.25 **Policy D DM1** relates to aspects of form and design quality. It states that *“when considering any application for development the Council will have regard to the following aspects:*
- 1. Character. Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.*



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2. *Appearance/attractiveness. Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.*
3. *Impact. Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.*
4. *Innovation. Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.*
5. *Adaptability. Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.*
6. *Crime prevention. Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.*
7. *Trees and woodland. All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.*
8. *Solar gain. Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.*
9. *Public realm. Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.*



10. *Layout - movement* Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

11. *Layout – legibility.* Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

12. *Public art.* Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures.

13. *Density.* The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

14. *Scale.* The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

15. *Aspects of form and design quality.* Development should also comply with the Arun District Council Design Guide”.

- 3.26 **Policy D DM2** relates to the Council internal space standards. The planning authority will require internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs.

3.27 **Policy T SP1** is a generally policy that refers to Transport and Development.

3.28 Finally, **Policy ENV DM2** refers to Pagham Harbour. It states that “...within Zone B (0-5km) for all new residential development and development which is likely to have an impact on Pagham Harbour will be required to:

i. Make developer contributions towards the agreed strategic approach to access management at Pagham Harbour.

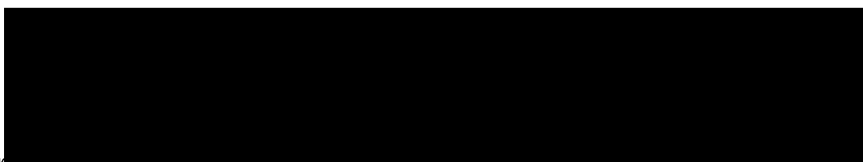
ii. create easily accessible new green spaces for recreation within or adjacent to the development site. These shall be capable of accommodating the predicted increases in demand for local walking, including dog walking. Good pedestrian links shall be provided between housing areas and new and existing green space in order to discourage car use...”

(iii) Supplementary Planning Guidance

3.29 The Council have supplementary planning guidance that relates to Parking Standards (October 2000). This note provides further guidance regarding parking in new developments.

(iv) Bognor Regis Neighbourhood Plan, 2015-2030

3.30 On 11th November 2015, Arun District Council resolved that the Bognor Regis Neighbourhood Development Plan, Submission Plan (incorporating examiners modifications and all modifications as per the ADC Decision Statement) be ‘made’ and become part of the Development Plan for Arun District Council. It sits alongside the Local Plan. The majority of the Neighbourhood Plan policies relate to specific identified sites or other major development proposals and as such, would likely be of little relevance in this instance.





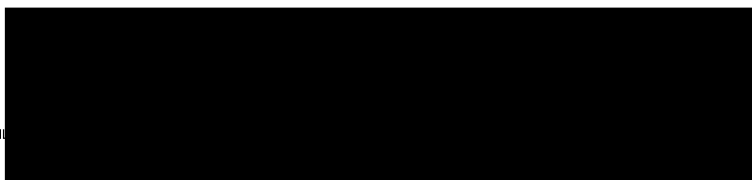
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4. PLANNING HISTORY

(i) Application Site

4.1 According to the Council's online records the site that is the subject of this planning application has the following planning history:-

- **Planning ref: BR/101/13/:** Change of use of existing building from Residential Care Home for Children and Young People (Use Class C2) to House of Multiple Occupation for 18 persons (Sui Generis). Approved Conditionally – 3rd September 2013.
- **Planning ref: BR/123/03/CLE/:** Application for a Certificate of Lawfulness for an existing use as residential care home for children and young people – Use Class C2. Approved – 5th August 2003.





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5. THE PROPOSAL

- 5.1 This proposal comprises the erection of a new building on land located to the south of Ravenna House. This new building will be detached from the host building, and will be 2½ storeys in size.



Fig 4. Proposed Streetscene Plan

- 5.2 The new building will contain 3 new flats – comprising 1 no. 2-bed flat on each of the ground and first floors, and a further 1-bed flat at second floor level (within the roofspace of the building).
- 5.3 To the rear of the site there will be refuse and cycle storage structures to serve the new development. In addition communal outside space is also provided to serve the new residents.
- 5.4 Materials external proposed are bricks to the elevations, and plain tiles to the new buildings roof. These will be to match or similar to the materials of existing nearby buildings.



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- 5.5 No car parking is to be provided as part of this application, and there are no changes to the access arrangements other than the provision of a pedestrian path linking to the front door of the new apartments block.
- 5.6 Ravenna House is a larger 2½ storey building, which is currently in use as a House in Multiple Occupancy (HMO). Some work is required to the South facing bay window of Ravenna. This involves enlarging the windows to the sides to the bay window, though closing off the South facing window. The internal room arrangements of Ravenna House are not affected.



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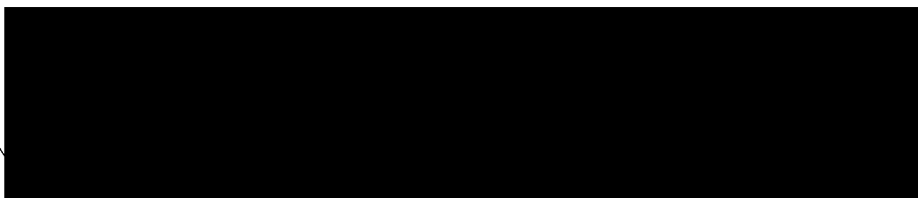


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6. PLANNING ASSESSMENT

a. Principle of development

- 6.1 The site is located within the defined built up area boundary for Bognor Regis where the principle of development is generally accepted, subject to other policies within the development plan.
- 6.2 The proposals will include the provision of 3 no. new flats, with the existing HMO use to Ravenna House being unaffected save for minor revisions to the fenestration details to the south facing rooms.
- 6.3 It is our view that a clear planning precedent has been set for flatted development in this area, as identified by the large number of well-established, and relatively recently permitted, flatted redevelopment schemes within the immediate surrounding area.
- 6.4 A further consideration in respect of this issue is that of housing supply. It is understood that the Council's most recent Authority Monitoring Report (AMR) confirms the Council cannot demonstrate a 5-year Housing Land Supply (HLS) as is required by the NPPF. The 2017/18 AMR showed there was currently a 4.7 year supply. The AMR for 2018/19 which was presented at December 2019's Planning Policy Sub- Committee shows that the HLS was 3.7 years. A recent appeal decision cites the Council as having a 2.9 year supply.
- 6.5 The Council's Action Plan (June 2019) makes a series of recommendations to boost housing delivery. This includes use of the 'presumption in favour of sustainable development' until such time as a 5-year housing land supply is re-established. It recommends applications be invited from landowners and developers on 'deliverable' HELAA sites to re-establish a 5 year HLS.



- 6.6 Given the HLS position, Paragraph 11 (d) of the NPPF and the application of the 'presumption' for sustainable development is now triggered. This states that permission should be granted unless any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.
- 6.7 In relation to Policy H SP1 in particular, the application site constitutes a windfall site, which are an integral part of the Council's housing strategy. The District Plan does not provide a definition of windfall sites, however the revised NPPF describes them as *"Sites not specifically identified in the development plan"*.
- 6.8 We consider that the site is sustainably located, being centrally located and with easy access to public transport and a range of services and facilities within the town centre and on Aldwick Road. This development is immediately deliverable, and would provide 3 new smaller units, within a sustainable location. This proposal represents a valuable, positive contribution towards the District HLS position.

b. Character & Appearance

- 6.9 Policy D SP1 of the Local Plan states development should seek to make efficient use of land but reflect the characteristics of the site and local area. Policy D DM1 looks at aspects of form and design quality, including; character, attractiveness, innovation, residential amenity impact, adaptability, density, scale, trees and crime prevention. Policy D DM4 sets out the policy with regard to alterations and extensions to existing buildings. This includes that extensions and alterations appear visually subservient to the main building and sympathetically relate to and are visually integrated with the existing building in terms of siting, scale, form, massing, design and materials. It also requires that the extension or alteration does not compromise the established spatial character and pattern of the place but is instead a positive addition.

- 6.10 The main basis for the design was to follow the aesthetics of the main building of Ravenna House, and to propose a new building of three apartments, which is being referred to as 'Ravenna Lodge'. In essence the design reflects the Victorian and Edwardian architectural features to create a building which relates to the site as a whole. For example, the bay windows on Richmond Avenue West of both existing Ravenna House and the new 'lodge' are of the same proportion. Other features are reflected also, such as sash windows, eaves details, roof pitches, traditional brick chimney stacks and the same construction materials of brick and plain tiles.
- 6.11 The proposal takes the form of three new apartments, accessed at the side rear via a communal internal staircase. The main elevation of the building will be onto Richmond Avenue West. There is ample space retained around the new 'Ravenna Lodge', with facilities provided for the storage of bicycles and refuse. Similarly amenity space is available for the drying of clothes and fresh air etc.
- 6.12 As detailed on the submitted street scene elevation (refer to Fig 4 above), the proposed development would be 2½ storeys in height, although would be set below the height of the host building (Ravenna House); and would represent a transition between this host building and the terraced properties on Aldwick Road to the south. When viewed from the streetscene, the new building would appear subservient to the host building, whilst also reflecting the appearance, features and proportions of Ravenna House.
- 6.13 The proposal would be set back from the road, following the front building line of Ravenna House. The building would be set behind new and additional boundary treatments, including planting.
- 6.14 It is our view that the proposed footprint of the building would be comparable with surrounding built form. It would sit comfortably on the site, providing an area of communal gardens to the rear of the building. The existing site is spacious and

underused, and this proposal will provide an efficient use of the available land resource. The proposed development will not be an overdevelopment of the site, and nor would it appear incongruous or jarring in the local context.

- 6.15 Some work is required to the South facing bay window of Ravenna. This involves enlarging the windows to the sides to the bay window, though closing off the South facing window. The internal room arrangements of Ravenna are not effected and still have plenty of light and ventilation. The works to Ravenna House are of a minor nature, and will not compromise the visual quality of the building, and nor will it adversely affect the amenities and living conditions of occupiers of the HMO units.
- 6.16 The scheme's architect has confirmed that the proposed development represents "*a typical town planning arrangement for such buildings to be positioned relatively close together. This is evident from the surrounding locality and the development of the area. In particular I refer you to the houses to the South of Ravenna.*"
- 6.17 This application proposal will provide a high quality, sustainable development, which will set a positive benchmark for Bognor Regis. It would appear wholly in keeping with neighbouring development and would not detract from the established spatial pattern and appearance of the surrounding area. It is our view that the proposal development would represent a high quality design that would appear in keeping with the established character of the surrounding area in compliance with Policies SP1 and D DM1 of the Arun Local Plan.

c. Residential Amenity

- 6.18 The proposal would provide a new building, with accommodation over three floors. As previously outlined, the property is located in an area where 2½ and 3-storey accommodation is commonplace.

- 6.19 It will be clear that great care and consideration has been given to the design of the building, with particular attention being paid to its siting and layout.
- 6.20 Ample separation distances would be maintained between the proposed development and neighbouring buildings to all sides. Further, great care and consideration has been paid to window placement, including that to existing Ravenna House – which is within the applicant’s control.
- 6.21 The proposed building would be set away from neighbouring development to the south on Aldwick Road, with an electricity substation separating the application site from the rear gardens of these properties.
- 6.22 In addition, there is ample potential for new planting to be provided to the sites boundaries to provide screening, if required. This could be controlled via a suitably worded planning condition, if deemed appropriate and reasonable by the Planning Officers.
- 6.23 Finally, the Government are placing increasing emphasis on achieving appropriate densities on sites such as this. At paragraph 123(c) of the NPPF it goes as far as to say that *“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)”*. It is our view that the proposed development meets these requirements and would be fully compliant with advice contained within both the revised NPPF and Policy D SP1 of the Arun Local Plan.

6.24 Taking into consideration all of the above, it is our view that the proposal would not have a detrimental effect on the residential amenities of the occupiers of any neighbouring dwelling by way of loss of light, overbearing effect or through the creation of noise and disturbance, and would be fully compliant with Policies SP1 and D DM1 of the Arun Local Plan.

d. Space Standards

6.25 All of the flats have been designed internally to meet the requirements laid out in the Governments 'Technical Housing Standards - nationally described space standard' document.

6.26 It is view that the proposed development would be fully compliant with **Policy D DM2** of the Arun Local Plan, in addition to the guidance set out within the Government's 'Technical Housing Standards' document.

e. Pagham Harbour SPA

6.27 The application is identified as being within the Pagham Harbour Buffer Zone B (5km).

6.28 Policy ENV DM2 of the Arun Local Plan refers to Pagham Harbour. It states that *"...within Zone B (0-5km) for all new residential development and development which is likely to have an impact on Pagham Harbour will be required to: i. Make developer contributions towards the agreed strategic approach to access management at Pagham Harbour. ii. create easily accessible new green spaces for recreation within or adjacent to the development site. These shall be capable of accommodating the predicted increases in demand for local walking, including dog walking. Good pedestrian links shall be provided between housing areas and new and existing green space in order to discourage car use..."*

6.29 The applicant understands that a financial contribution will be sought via a legal agreement in respect of this matter.

f. Other Matters

(i) Sustainable Development Summary

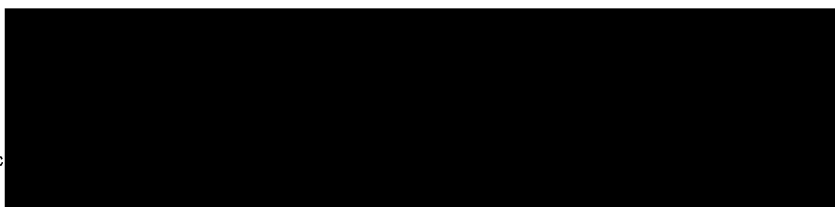
- 6.30 As outlined above, the focus of the new NPPF is for development to be sustainable. It sets out there are three principle 'objectives' to achieving sustainable development: economic, social and environmental. In this part of the Planning Statement the main factors that inform the judgement as to whether the proposal would be a sustainable form of development are summarised. In reaching that view all matters referred to in the above report have been taken into account.

Economic Objective

- 6.31 The planning proposal would result in the creation of construction jobs during the build period. The additional population could help generate more local spending in the local community, provision of infrastructure and services, and generate New Homes Bonus funding as well as additional Council Tax receipts. These are all material considerations that weigh in favour of the development. It is considered that the proposal would satisfy the economic role of sustainable development.

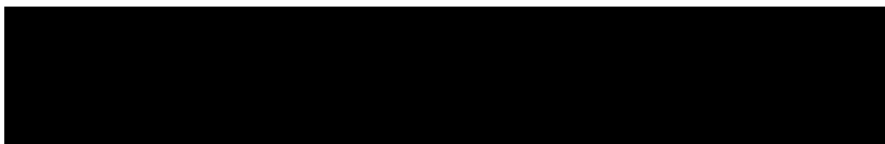
Social Objective

- 6.32 The provision of 3 no. flats will make a modest, albeit notable contribution to boosting the supply of housing in the District. The NPPF seeks to promote "*strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*". Due to the location of the site within the built-up area of Bognor Regis, close to the town centre where there are a number of services, facilities and transport options including a railway station, it is considered that the location of the site is highly sustainable. Overall it is considered that the proposal would satisfy the social role of sustainable development.



Environmental Objective

- 6.33 There is an overriding need to ensure that development should contribute to protecting and enhancing the natural, built and historic environment. The proposed development in terms of layout, scale and appearance is considered to be in keeping with the character of the surrounding area and hence would not result in an adverse impact to the character of the surrounding built environment. There are no biodiversity or landscape constraints that relate to this site. The proposal would not result in any highway safety problems. As such, the environmental role of sustainable development would be satisfied by this proposal.





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7 CONCLUSIONS

- 7.1 The proposal seeks planning permission for the erection of a 2½ storey building to provide 3 flats (1 x 1-bed and 2 x 2-bed) with associated amenity areas, together with minor fenestration changes to the host building (Ravenna House).
- 7.2 The application site is located within the established built up area boundary, where the principle of new residential development is generally accepted, subject to compliance with other policies in the plan.
- 7.3 The application site is located within a highly substantial area, within easy reach of Aldwick Road and Bognor Regis Town Centre and its host of facilities and services.
- 7.4 The surrounding area is mixed in character, comprising a mixture of housing and flatted development. Ravenna House itself is a House in Multiple Occupation.
- 7.5 The proposals will be set within the grounds of an existing spacious corner plot. The land in question is currently under used, whilst this proposal represents an efficient use of the site by providing an appropriately designed new building that will accommodate 3 new much needed apartments.
- 7.6 The proposal would be set down below the height of Ravenna House, and the new building would appear subservient to this building. The proposals have been designed to respect Ravenna House, whilst also being a visual transition between the terraced properties on Aldwick Road to the south, and Ravenna House and the adjacent flatted development to the northeast. It is our view that the proposal would represent a high quality development, that would appear in keeping with the existing street scene in terms of scale, siting, form and design.

- 7.7 The proposed development would be located appropriately with ample space maintained to the site boundaries, allowing a good relationship between adjoining buildings.
- 7.8 It is our view that the proposal would represent an acceptable form of development and would not cause demonstrable harm to the residential amenities of any neighbouring property by way of overbearing effect, loss of privacy or loss of light. Further, the proposals would provide a good standard of living conditions for future occupiers.
- 7.9 The application is identified as being within the Pagham Harbour Buffer Zone B (5km). It is understood that financial contributions will be sought via a legal agreement.
- 7.10 The proposal will provide a high quality, sustainable development, which will set a positive benchmark for Bognor Regis. It would appear wholly in keeping with neighbouring development and would not detract from the established character and appearance of the surrounding area, nor cause demonstrable harm to the residential amenities of any neighbouring property. The proposal would accord with the aims and objectives of national, regional and local policy and guidance, the application site is a suitable location for housing and permission should be granted.

July 2020