



JDRM Architects

Studio 8, Beaconsfield Studios

25 Ditchling Rise, Brighton

BN1 4QL

Planning Statement

Redevelopment of Land at Former Westside Supplies, Durban Road/Ash Grove

December 2021



1. Introduction

- 1.1. PHPM Properties Ltd (the Applicant) are applying for full planning permission for a proposed residential development of the site of the former Westside Supplies unit on the corner of the junction between Ash Grove and Durban Road. The proposals comprise a single block containing 24 new homes.
- 1.2. The site area is approximately 1,200sqm, (0.12 hectares).
- 1.3. The proposals include a mix of 1-bedroom and 2-bedroom apartments arranged in a single block facing the corner of Ash Grove and Durban Road. There is an under-croft parking area for residents and private/communal gardens arranged on both street frontages.
- 1.4. The site is currently vacant and any previous structures long since demolished. The former unit was called 'Westside Supplies' and was a triangular shaped single storey building.
- 1.5. There have been many previous applications for the redevelopment of the site, the latest being approved in April 2019. Although still within the three-year initial period, no development has been progressed.
- 1.6. This document sets out how the application meets the requirements of local and national planning policy.
- 1.7. Included with the application are a full set of drawings and technical reports. These will be referenced in this statement, but the documents should be consulted for full details of the scheme.
- 1.8. This statement sets out why planning permission should be granted for the proposed development.

2. Site & Local Area

- 2.1. The site is located on the western edge of the Durban Road Industrial Estate, Bognor Regis.
- 2.2. The application site is vacant, the single-storey detached building (former Westside Supplies) has now been demolished.
- 2.3. The site comprises a triangular parcel of land with a slight downward slope to its centre. The surrounding footpaths on Ash Grove and Durban Road are generally flat. A chain link fence (some areas dilapidated) surrounding the site on all boundaries. There are some large mature Willow trees to the north.
- 2.4. The site is bounded by roads on two sides (Ash Grove to the west and Durban Road to the south). To the east, JG Autos, a single storey building, operates with its car parking area immediately at the boundary and to the north is a car park for a large business Unit.
- 2.5. To the South, West and North there is predominantly private residential housing via a mixture of houses and flatted accommodation.



Aerial photo of site and surrounding area



- 2.6. The application site is not within any Conservation Area with the closest being the Railway Station area and Hotham Park – they're the closest but not in any way close enough to be affected by this sought development.
- 2.7. The site is within Flood Zone 3a, an area indicated as being at high risk from rivers and the sea. A Flood Risk Assessment, Exception and Sequential Test has been prepared as part of this application and this has identified that 'the overall flood risk from all sources is considered to be low with the exception being the higher risk from fluvial and tidal flooding. The site would benefit from raised site levels to raise the proposed internal floor level atleast 150mm higher than any proposed external ground level'.

3. Planning History & Context

3.1. A number of previous applications have been submitted for the development of the site as listed below.

Reference	Proposal	Status
<u>BR/90/18/PL</u>	Demolition of two storey building & erection of three storey block of 8 No. one bedroom flats & 6 No. two bedroom flats with access from Durban Road (resubmission following BR/87/16/PL).	Approved subject to conditions
<u>BR/87/16/PL</u>	Demolition of two storey building & erection of three storey block of 8 No. one bedroom flats & 6 No. two bedroom flats with access from Durban Road.	Refused
<u>BR/156/15/DOC</u>	Application for approval of matters reserved by condition imposed under BR/198/11 relating to conditions 4, 12 & 13 - Scheme to deal with risks of contamination (4), Cycle & Bin storage (12) & scheme for provision of foul & surface water drainage (13)	Refused
<u>BR/198/11/</u>	Outline Application with some matters reserved for demolition of derelict two-storey building and erection of three-storey block of eight one-bedroom flats and six two-bedroom flats with access from Durban Road. Re-Submission following BR/341/10. This application also falls within the parish of Bersted.	Approved subject to conditions
<u>BR/341/10/</u>	Outline application with some matters reserved for the demolition of derelict 2 storey office building & erection of 8 no. 2 bed flats & 6 no. 1 bed flats with ground floor parking, bin & cycle storage & childrens play area	Appeal dismissed
<u>BR/381/07/</u>	Outline application for demolition of existing building and erection of three storey block of 8 1-bedroom and 6 2-bedroom flats, with access from Durban Road (Re-submission following BR/156/07/)	Appeal dismissed
<u>BR/156/07/</u>	Outline application for demolition of existing building and erection of three storey block of 17 one bedroom flats, with associated car parking and access from Durban Road	Refused

3.2. There have been two approved applications, BR/198/11/ in 2011 and BR/90/18/PL in 2019 via Appeal.



4. Proposals

- 4.1. The application is for a residential block consisting of 24 flats.
- 4.2. The proposed development is a four storey single block with a significantly set-back fourth storey to ensure visibility from street-level is three storeys only.
- 4.3. The residential housing mix is:
- | | | | |
|--------|--------------|-----------------|-------|
| 4.3.1. | Studios | 2 units | (8%) |
| 4.3.2. | 1-bedroom | 11 units | (46%) |
| 4.3.3. | 2-bedroom | 11 units | (46%) |
| 4.3.4. | Total | 24 units | |
- 4.4. Of the residential units, 30% of these will be affordable, of these affordable units 75% will be rent and the remaining 25% will be intermediate housing in accordance with Arun Local Plan Policy AH SP2.
- 4.5. 26 car parking spaces are provided all at surface level. Parking will be provided via an undercroft car park accessed from Durban Road. Some spaces are outside of the gated entrance to the undercroft, immediately either side of the gate on Durban Road.
- 4.6. All of the parking spaces will be fitted with electric car charging facilities.
- 4.7. Car club/car sharing and a disabled space are allowed for.
- 4.8. A total of 30 cycle storage spaces will be provided as part of the scheme, these will be allocated as follows:
- | | |
|--------|--|
| 4.8.1. | 24 secure covered spaces for residents. |
| 4.8.2. | 6 external spaces for visitors to the dwellings. |

Relevant Planning Policies

4.9. The proposals will be considered against the policies set out in the following documents:

- The National Planning Policy Framework (NPPF)
- Arun Local Plan

The relevant policies from each of these documents have been set out below.

4.10. National Planning Policy Framework

- 4.10.1. Paragraph 11 sets out the presumption in favour of sustainable development which requires authorities to approve development proposals that accord with an up-to-date development plan without delay.
- 4.10.2. Paragraph 68 requires authorities to support the development of small and medium sized windfall sites and give great weight to the benefits of using suitable sites within existing settlements for homes.
- 4.10.3. Paragraph 93 states that ‘planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.’
- 4.10.4. Paragraph 131 requires great weight to 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.

4.11. Arun District Local Plan 2011 - 2031

4.11.1. Policy D DM1 – Aspects of form and design quality

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.

Appearance/attractiveness - *Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.*

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.

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.

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

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'

Trees and woodland - All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

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.

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.

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.

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).

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.

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.

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.

Aspects of form and design quality - Development should also comply with the Arun District Council Design Guide

4.11.2. Policy D SP1 – Design

'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.

4.11.3. Policy QE DM1 – Noise Pollution

'**New noise sensitive development** - Residential development likely to experience noise from road, rail or air, in particular development in close proximity to:

- A284/A259 Wick roundabout
- Stretches of the A27 around Arundel and Fontwell
- Sections of the A29 and A259 in Bognor Regis
- A284 in Littlehampton and
- The stretch of railway line that runs through Barnham station

must:

a. Be supported by a noise exposure category (NEC) assessment and designed to ensure that residents will not be adversely affected by noise.

b. Consider both the likely level of exposure at the time of application and any increase that might be reasonably expected in the foreseeable future. To safeguard the continued use of existing industrial and commercial uses and to protect amenity, noise sensitive development should not normally be permitted where:

c. High levels of noise will continue throughout the night, especially during the hours when people are normally sleeping.

d. There is a likelihood of complaints about noise from industrial development.

New noise generating development - Developers proposing new noise generating development must seek advice from an early stage to determine the level of noise assessment required. Proposals will need to be supported by:

a. Evidence to demonstrate that there are no suitable alternative locations for the development.

Policy QE DM2 - Light Pollution

Planning permission for proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications. Outdoor lighting schemes will be considered against the following criteria: a. No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation; b. Light levels being the minimum required for security and working purposes;

c. Minimising the potential glare and spillage; and d. The degree to which outdoor lighting can be powered by on-site renewable sources. Where appropriate, the Local Planning Authority will seek to control the times of illumination.

Policy QE DM3 - Air Pollution

'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.*

Development proposed nearby any Air Quality Management Area (AQMA) declared within the District within the Plan period, will require an air quality assessment to identify likely impacts of development upon the designated area. Developers will be required to ensure delivery of the actions set out within any Air Quality Action Plan.

Industrial development which is regulated by environmental permits (that creates or results in dust, smell, fumes, smoke, heat, radiation, gases, steam or other forms of pollution) must be located in such a position which ensures that the health, safety and amenity of users of the site or surrounding land is not put at risk and the quality of the environment would not be damaged or put at risk.

Developments shall also be consistent with all other Local Plan policies.

Policy QE DM4 – Contaminated Land

'Council promotes, and will permit, the use of previously developed land and the remediation of contaminated land to ensure that land is brought back into use, subject to the following requirements.

Prior to any development, the Council will require evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the

development. In particular, the developer shall carry out an adequate investigation to inform a risk assessment to determine:

- a. Whether the land in question is already affected by contamination through indirect pollutant linkages and how those linkages are represented in a conceptual model.*
- b. Whether the development proposed will create new linkages to vulnerable resources e.g. Waterbodies.*
- c. What action is needed to break the link between the contamination and vulnerable natural resources and avoid new ones, deal with any unacceptable risks and enable safe development and future occupancy of the site and neighbouring land.*

Where an agreed remediation scheme includes future monitoring and maintenance schemes, arrangements will need to be made to ensure that the costs of ongoing maintenance are the responsibility of the landowner and that any subsequent owner is fully aware of these requirements and assumes ongoing responsibilities that run with the land.

Policy QE SP1 – Quality of the Environment

The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

The location of existing industrial and commercial uses, including waste management uses, must be taken into consideration when assessing proposals for development sensitive to noise, light, odour and outputs to air. This is to ensure that land allocated for these uses are protected and to ensure that the amenity of new developments and facilities is safeguarded from the impacts of incompatible land uses.

Policy W DM2

'Development in areas at risk from flooding, identified on the latest Environment Agency flood risk maps and the Council's Strategic Flood Risk Assessment (SFRA) , will only be permitted where all of the following criteria have been satisfied:

- a. The sequential test in accordance with the National Planning Policy Guidance has been met.*
- b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.*
- c. The sustainability benefits to the wider community are clearly identified.*
- d. The scheme identifies adaptation and mitigation measures.*
- e. Appropriate flood warning and evacuation plans are in place; and*
- f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e. consideration of flood flow routing and utilising temporary storage areas.*

The reports prepared as part of the criteria above must take into account contingency allowances, taking climate change into account as set out in Flood Risk Assessments: climate change allowances section of the NPPG.

In locations where strategic flood defence or resilient and resistant construction measures are necessary within the site itself, proposals will be required to demonstrate how measures have been incorporated as an intrinsic part of the scheme in a manner which is compatible with the latest Strategic Flood Risk Assessment.

All development proposals must take account of relevant Surface Water Management Plans, Catchment Flood Management Plans and related Flood Defence Plans and strategies such as the Lower Tidal River Arun Strategy. The council may require financial contributions from development on sites where measures to address flood risk or to improve the environmental quality of watercourses have been identified by these Plans and Strategies.

5. Analysis of Scheme

5.1. Principle

- 5.1.1. The proposed scheme has been the subject of extensive pre-application discussions with planning officers from Arun local authority. Officer's feedback to date has generally been supportive of the proposed design providing an Exception and Sequential Test is undertaken (it has and passed – see report) and the top floor is significantly set back.
- 5.1.2. The application site has history of planning approvals for residential development. This scheme aims to increase the density by only ten dwellings, yet the principles of the previously approved schemes remain relevant.
- 5.1.3. The now expired permission for AWDM/0203/11 established the principle of residential development on the site. Whilst this was only for 4 units, an earlier application, ADC/0277/10, was supported by the council but had to be withdrawn due to HSE objections. The reason for those objections no longer applies, thereby facilitating a denser development than previously approved.
- 5.1.4. The development represents a brownfield site that will contribute to the shortfall of new homes in Arun district five year supply. The development will contribute to the wider regeneration providing new homes, amenity space and employment during its construction period.
- 5.1.5. The development provides 24 high quality residential units on a site area of 0.12 hectares making efficient use of the available land a brownfield site and exceeding the minimum residential density requirements.

5.2. Design

- 5.2.1. The application site is located on the western corner of an industrial estate also adjacent to various residential homes. The development therefore provides an opportunity to create a corner gateway landmark development, uplifting the public realm and street scene.
- 5.2.2. The high-quality contemporary design has been developed to acknowledge the suburban nature of immediate surroundings whilst also providing a nod to traditional coastal architecture, full justification of the proposed design is set out in the Design and Access Statement.

-
- 5.2.3. The proposed scheme has been the subject of extensive pre-application discussions with planning officers from Arun local authority. Officer's feedback to date has generally been supportive of the proposed design.
- 5.2.4. A number of revisions to the scheme have been made in response feedback received from successive pre-application submissions and presentations, these include a reduction in the overall height and density to reduce the perceived massing of the scheme, especially the visibility of the top floor from close proximity.
- 5.2.5. The proposed scheme has been designed with a tiered arrangement to reduce the perceived mass of the scheme and respond to the adjacent existing street scene.
- 5.2.6. The main body of the building is 3 storeys with a significantly inset 4th top floor. The 3-storey mass therefore directly reflects the taller adjacent buildings and provides a domestic scale as perceived from the street.
- 5.2.7. In addition to the setbacks and tiering, the material composition has been designed to reduce the vertical appearance of the building. The ground floor is clad in a mid-grey multi brickwork to ground the development and provide a plinth to the lighter upper floors which are clad in red multi brickwork. The top floor of the main block and both wings is clad in a contrasting anodized aluminium cladding (bronze/gold in appearance – see Design and Access statement for more details).
- 5.2.8. The overall effect is a development that sits comfortably in relation to the existing surrounding blocks whilst providing a significant aesthetic improvement.
- 5.2.9. The existing neighbouring residential buildings to the west lack any form of active frontage onto Ash Grove as their rear elevations face the road/public footpath. This presents a unique design challenge and the result is a long stretch of the A259 that is devoid of interest or activity. A key driver of the proposed scheme has been to address this issue, and this led to the inclusion of a more animated building frontage with communal and private garden spaces. These aspects of the proposed scheme will be a key first step in the wider reactivation of the surrounding area.
- 5.2.10. The Local Authority can rest assured that the impact from the proposed development will not have a demonstrable detrimental impact on landscape character and visual amenity, and by implementing the suggested mitigation

measures it would reduce any negative perceptions of the site and help to strengthen and improve the landscape character of the area.

5.3. Accommodation

- 5.3.1. 7 of the proposed units will be designated as affordable with these units provided as 75% social/affordable rented housing and 25% intermediate housing. This represents an overall affordable housing provision of 30% and is therefore fully compliant with Arun Local Plan policy AH SP2.
- 5.3.2. All of the proposed dwellings are fully compliant with the nationally prescribed space standards and have been designed in accordance with the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings.
- 5.3.3. The proposed units feature generous external balconies providing private amenity space far in excess of similar developments in the local area.
- 5.3.4. All of the units feature generous floor to ceiling glazed elements in every habitable room thereby providing excellent levels of internal daylighting. Each unit will also be fitted with a Mechanical Ventilation Heat Recovery system to provide a high level of internal air quality.

5.4. Refuse Strategy

- 5.4.1. Provision has been made for the sorting of recycling and storage of refuse with a secure bin store provided at ground floor level, this will provide the equivalent of 140L refuse and 140L recycling storage per residential unit and is therefore compliant with local policies. Full details of refuse and recycling provisions are set out in the Design and Access statement.

5.5. Impact on Amenity

- 5.5.1. The development has other residential buildings to the south and west. As per recommendations within the Arun Design Guide, the proposed building is set far enough away from any neighbouring amenity to ensure privacy and protection for both existing homes and proposed building users.
- 5.5.2. None of the existing residential blocks will therefore suffer any loss of privacy, overshadowing, or loss of outlook and therefore the proposals are compliant with Arun design policies.

5.6. Sustainable Transport & Highways

- 5.6.1. A Transport Assessment has been undertaken by Encon Associates in accordance with the Arun Local Plan.
- 5.6.2. The proposed level of parking provision has been concluded to provide a sufficient balance to encourage alternative sustainable modes of travel and will adequately serve the needs of the residents without leading to indiscriminate on-street parking within the vicinity of the site which is currently in high demand.
- 5.6.3. The scheme proposes 24 cycle spaces for residents (in a secure internal space) and 6 visitor spaces adjacent to the communal front entrance.
- 5.6.4. The location of the site provides good accessibility by sustainable modes, with a bus stop located within walking distance of the site. The train station is located 2km south of the site and provides good viability for commutes on a regular basis as opposed to driving. There is a good range of local amenities within a 15 minute walk of the development, with Bognor Regis town centre 2.2km south of the development.
- 5.6.5. application discussions, planning officers encouraged the applicant to explore progressing the scheme with no permanent parking provision for residents, with the scheme only retaining the 3 surface level parking spaces for visitors. This was explored by the applicant and discussed with West Sussex County Council Highways, but it was ultimately not possible to provide justification for full omission of parking provision.
- 5.6.6. The Local Authority can rest assured that the impact on the local roads from the proposed development has been assessed in terms of traffic generation, sustainable accessibility and highway safety and would not present a detrimental impact to the highway network.

5.7. Energy Efficiency & Sustainability

- 5.7.1. An Energy & Sustainability report has been produced by Nuplanet Sustainable Solutions and is submitted as part of this application.
- 5.7.2. The new dwellings, through the inclusion of an energy conscious design and energy efficiency measures with the use of a 'fabric first' approach, will exceed minimum Building Regulation 2013 L1a standards. The development has also set targets to include the use of Low & zero carbon technologies. PV



panels are proposed at roof level accounting for 40.69% cumulative reduction in CO2 emissions.

- 5.7.3. Each dwelling has a MVHR system which assists with supply and extraction of clean/stale air whilst enabling windows to remain closed due to noise constraints.
- 5.7.4. Heating and hot water to each dwelling is via individual gas combi boilers.

6. Summary and Conclusions

- 6.1. The site is a prominent corner of the junction between Ash Grove and Durban Road on an existing industrial estate, however the sites previous uses have ceased a long time ago and the only building which stood, the former Westside Supplies unit, has long since been demolished.
- 6.2. The proposals comprise a single block containing 24 new homes. The proposals include a mix of 1-bedroom and 2-bedroom apartments arranged in a single block facing the corner of Ash Grove and Durban Road.
- 6.3. There is an undercroft parking area for residents and private/communal gardens arranged on both street frontages.
- 6.4. The site area is approximately 1,200sqm, (0.12 hectares).
- 6.5. The scheme will provide 24 high quality homes 7 of which will be affordable thereby making a meaningful contribution to Arun's current housing needs and the existing shortfall in the 5 year housing supply.
- 6.6. The scheme will provide a significant visual improvement to the immediate surrounding area that is currently lacking any form of activity or visual interest.
- 6.7. The proposals will bring an under-used brownfield site back into productive use, benefitting the local economy and acting as a catalyst for future investment in the area.
- 6.8. The scheme does not have undue negative impacts on the surrounding amenity, air quality, traffic safety, flood risk and other ecological interests.
- 6.9. The proposals therefore comply with the requirements of the Arun Local Plan and the National Planning Policy Framework and we therefore ask the authority to approve the application without delay.