



RODWAY PLANNING
CONSULTANCY LIMITED

PLANNING SUPPORT STATEMENT

In relation to:

***‘Erection of a three storey building to provide
9 no. flats, comprising 6 no. 1-bed and 2 no.
2-bed units, with associated amenity areas,
access and car parking, following the
demolition of an existing dwelling’***

99 Victoria Drive, Bognor Regis, West Sussex

November 2018

PLANNING STATEMENT

99 Victoria Drive, Bognor Regis, West Sussex PO21 2DZ

I. INTRODUCTION

- 1.1 This planning application proposes the erection of a new three-storey building to provide 9 new flats, comprising 6 x 1-bed and 3 x 2-bed units, with associated amenity areas and car parking, following the demolition of an existing dwelling (No.99 Victoria Drive).
- 1.2 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.
- 1.3 This statement should be read in conjunction with the submitted drawings, which have been prepared by Chris Moore, Sussex Building Consultancy Limited.



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2. SITE CONTEXT

- 2.1 The proposed development seeks to demolish No. 99 Victoria Drive, an existing two storey detached property with additional accommodation in the roof. The property is accessed off Victoria Drive and has an existing single storey, single garage and car port attached to the north east side.
- 2.2 The application site is broadly rectangular in shape and measures approximately 0.98 hectares (981m²) in size. It sits on the north west side of Victoria Drive, relatively close to the junction with Linden Road.

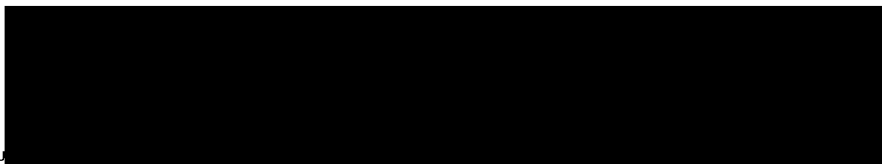


Fig 1. Aerial map showing the appeal site and its surroundings (*courtesy of Google Maps*)

- 2.3 Existing boundary treatment comprises a mixture of dense tree and hedge coverage to all sides. The existing site frontage comprises a 1m high brick wall.

- 2.4 The surrounding area is mixed, predominately characterised by detached and semi-detached properties, as well as flatted development. Buildings are varied in their heights and design; although typically two and three storeys. Surrounding buildings consists of a variety of uses, including residential dwellings, flatted development, retirement homes and bed and breakfast uses.
- 2.5 In terms of the application sites designation in relation to Local level policies, the site is located within the built up area boundary for Bognor Regis, as defined by the Local Plan Policy Map 3: Bognor Regis and the Local Area.
- 2.6 The site is also identified as being within the Pagham Harbour Buffer Zone B (5km).
- 2.7 The building that is to be demolished in order to facilitate the proposed development is **Not** Listed, nor is it located within a Conservation Area.
- 2.8 To our knowledge, no other planning constraints or designations are applicable to the application site.

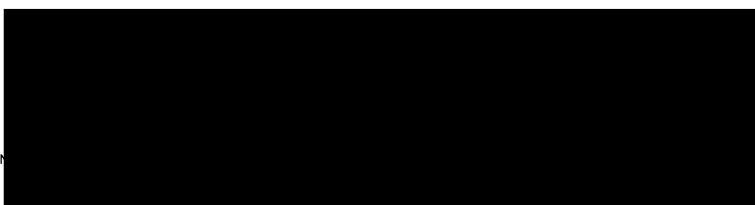
- 3.3 It will be clear that great care and consideration has been given to the design of the building, with particular attention being paid to its scale, form, siting, design and materials.
- 3.4 The building would comprise of face stock brickwork with vertical stained Larch or Cedar cladding, whilst the roof will consist of 'Marley Modern' concrete tiles.
- 3.5 Windows and doors would be white PVC framed double glazed units. The applicant would be happy for material details to be conditioned accordingly.
- 3.6 An expansive area of communal garden is proposed towards the rear of the development. Private amenity space is also created through the introduction of 8 No. private balcony/patio areas.
- 3.7 Car parking will be provided in the form of 9 No. parking spaces positioned to the rear north west corner of the site, in an L-shaped formation in order to provide space for on-site turning. This will provide 1 No space per unit. The existing access point onto Victoria Drive would be maintained. The access and parking areas will comprise permeable materials. In addition, provision has also been made for secure storage for bicycles.
- 3.8 Bin and recycling storage is positioned to the front south east corner of the site, as detailed on the submitted plans.
- 3.9 Landscaping will be provided as part of the development, which will include the addition of a flowering cherry and a silver birch tree.



4. PLANNING POLICY CONTEXT

(i) National Planning Policy Framework (NPPF)

- 4.1 The National Planning Policy Framework (NPPF) was published in July 2018, and at that time the policies in the Framework came into use, with immediate effect. This guidance is now the most-up-to date Government Guidance and replaces all planning policy statements/ guidance that were previously in place.
- 4.2 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.
- 4.3 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).



- 4.4 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”.*
- 4.5 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.”*
- 4.6 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.**”*
- 4.7 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...”*

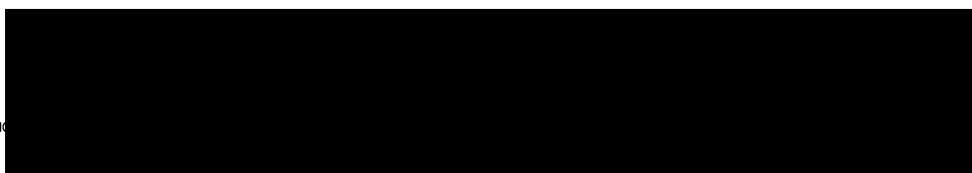
- 4.8 At paragraph 73 the NPPF sets out that *“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their 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”*
- 4.9 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.
- 4.10 At paragraph 103 the Framework confirms that *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*
- 4.11 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.”

- 4.12 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.”
- 4.13 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.”
- 4.14 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”.
- 4.15 Paragraph 118 sets out that decision makers are required to give regard to benefits of development, including environmental gains, and should “give substantial weight to the value of using suitable brownfield land within settlements for homes... [and] promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”
- 4.16 Paragraph 120 states that “decisions need to reflect changes in the demand for land... applications for alternative uses on the land should be supported, where the

proposed use would contribute to meeting an unmet need for development in the area.”

- 4.17 Paragraph 122 discusses the need to achieve appropriate densities. Account needs to be given to the identified need for different types of housing and the availability of land suitable for accommodating it, local market conditions, sustainability, existing character and setting, and *“the importance of securing well-designed, attractive and healthy places.”*
- 4.18 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...”*
- 4.19 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.”

- 4.20 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.”*
- 4.21 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

- 4.22 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.
- 4.23 As identified on **Fig 6**, 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.



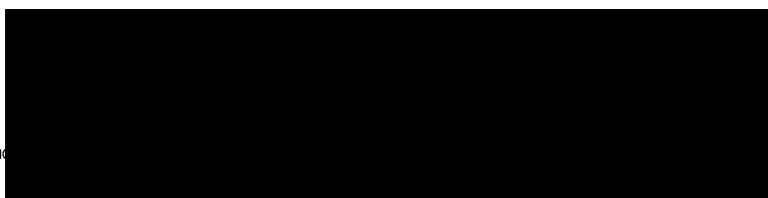
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Fig 3. Extract from Arun Local Plan Policy Map 3: Bognor Regis & Surrounding Area

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

4.25 **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”*.



- 4.26 **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”*.
- 4.27 **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”*.
- 4.28 **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.

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.

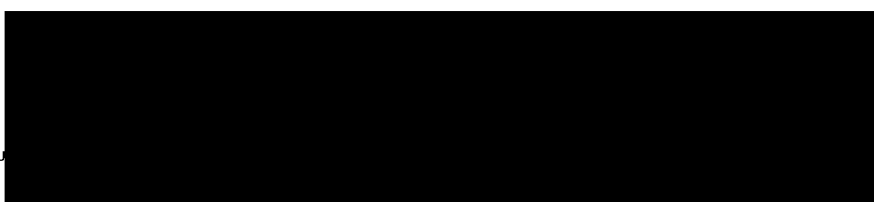
5. Adaptability. Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses 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





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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.

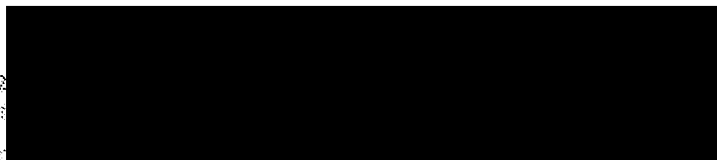
15. Aspects of form and design quality. Development should also comply with the Arun District Council Design Guide”.



- 4.29 **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.
- 4.30 **Policy T SP1** is a generally policy that refers to Transport and Development.
- 4.31 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) Bognor Regis Neighbourhood Plan, 2015-2030

- 4.32 On 11 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 NP’s policies relate to specific identified sites or other major development proposals. As this scheme is neither, these policies appear to not be relevant in this case.





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5. PLANNING HISTORY

a. Application Site

- 5.1 According to the Councils online planning records there is no planning history in relation to this site.

b. Adjoining Sites

- 5.2 There is clear evidence of much new residential development taking place within both the immediate vicinity and the wider area, within recent years. It is noteworthy that much of this development comprises flatted development. A number of examples of these planning approvals are set out in detail below:-

Land at No. 7 Victoria Drive (also fronting Charlwood Street)

- 5.3 **Planning ref: BR/378/03/:** 22 No. flats in 2 no. buildings and associated parking. Approved, subject to a S106.

21 Victoria Drive

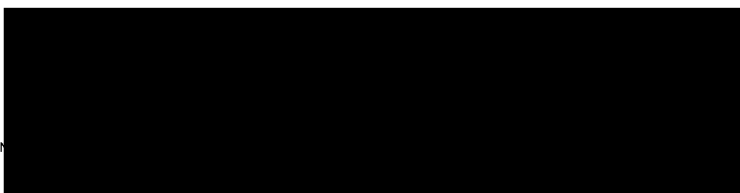
- 5.4 **Planning ref: BR/247/88/:** Proposed construction of 3 no 1 bed and 4 no 2 bed flats in a 2 and 3 storey block. Approved Conditionally.

43 Victoria Drive

- 5.5 **Planning ref: BR/224/89/:** Extensions to form 4 no. 1 bedroom flats for elderly persons. Approved Conditionally, subject to a S106.

55 Victoria Drive

- 5.6 **Planning ref: BR/181/15/PL/:** 1 no 2 storey 3 bed cottage with private garden and single storey detached carport. Resubmission of BR/31/14/PL. Approved Conditionally subject to a S106.





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- 5.7 **Planning ref: BR/313/14/PL/:** Creation two apartments above garage blocks & to retain the existing house at 55 Victoria Drive to form part of the development approved under BR/217/07 & amended under BR/389/07/. Approved Conditionally.

55 & 57 Victoria Drive

- 5.8 **Planning ref: BR/389/07/:** Minor amendments to layout and repositioning of units 1 & 2 and units 3 & 4 as previously approved under BR/217/07. Approved Conditionally subject to a S106.

- 5.9 **Planning ref: BR/217/07/:** Residential development – one detached with a garage, six semi-detached and six flats. Approved Conditionally.

66 Victoria Drive

- 5.10 **Planning ref: BR/104/93/:** Details in pursuance of BR/298/92/ for construction of 4 no 3 bedroom 4 person houses. Approve.

- 5.11 **Planning ref: BR/298/92/:** Outline Application for the construction of 4 no. 3 bedroom, 4 person houses. Approved Conditionally.

- 5.12 **Planning ref: BR/282/90/:** Erection of 12 no. 1 bed flats (6 limited for occupation by the elderly), revised car parking and landscaping to supersede previously approved layout (BR/640/88). Approved.

- 5.13 **Planning ref: BR/640/88/:** Conversion and extension of residential unit into 6 no. 1 bed flats. Approved Conditionally.

- 5.14 **Planning ref: BR/437/88/:** Conversion of house to form 7 studio flats and addition to form further studio flat all to be occupied by persons of State Pensionable Age. Approved Conditionally subject to S106.

5.15 **Planning ref: BR/273/88/:** Outline application for 10 one bed flats to be occupied by persons of State Pensionable Age. Approve Conditionally.

5.16 **Planning ref: BR/274/88/:** Change of use to Nursing Home. Rest Home. Approved Conditionally.

Baptist Church, 73 Victoria Drive

5.17 **Planning ref: BR/270/05/:** Proposed loft conversion providing 1 x 1 bedroom flat. Approved Conditionally.

86 – 88 Victoria Drive

5.18 **Planning ref: BR/79/93/:** Details in pursuance of BR/297/92 for the construction of 12 no. 3 bedroom houses. Approve.

5.19 **Planning ref: BR/297/92/:** Outline application for the construction of 12, 3 bedroom houses. Approved Conditionally.

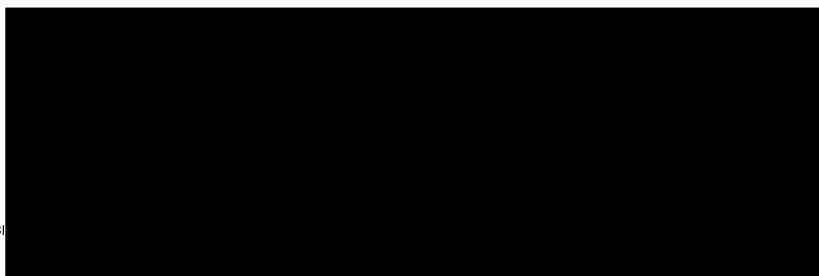
88 Victoria Drive

5.20 **Planning ref: BR/455/87:** Conversion of 8 bedsitting rooms to 5 one bed and one studio flat. Approved Conditionally.

101 Victoria Drive

5.21 **Planning ref: BR/155/06/:** Approval of reserved matters following outline consent BR/280/05 for demolition of existing dwelling and garage and erection of 6 new flats. Approved Conditionally.

5.22 **Planning ref: BR/280/05/:** Outline application to demolish existing dwelling and erect 6 new flats. Approved Conditionally.





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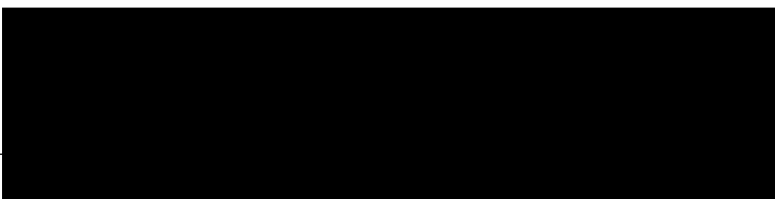
6. PLANNING ASSESSMENT

a. Principle of development

- 6.1 As outlined by the LPA's Proposal Map, 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 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 recent flatted redevelopment schemes that have been permitted on Victoria Drive (please refer to Section 5 above).
- 6.3 In terms of housing supply, it is understood that the District Council's position is having now formally adopted the new Local Plan, which includes a housing strategy for the plan period, that the authority is now able to demonstrate a 5.3 year housing land supply. However, we consider that there is a need for the Council to continue to grant permission for residential development to maintain this housing land supply.
- 6.4 It is our view, that the Council's housing supply position can currently be described as marginal, with reliance on a number of factors – including significant delivery of housing on strategic allocations within the 5 year period; and the adoption of a new Non-Strategic Site Allocations Development Plan Document (DPD).
- 6.5 When taken with the NPPF's requirement for authorities to significantly boost the supply of housing, and that the housing requirement of the Council are set out as a minima (i.e. the housing figures set out in Policy H SP1 is for *"at least 20,000 new homes"* within the Plan period, and is evidently not capped), in our view, these factors combine to provide significant material considerations that point to a need for the local authority to continue to approve residential development that is sustainable in its nature. These considerations must be taken into account in determining this

planning application, and for the reasons set out in this submission, we consider that the planning balance will confirm that the Application scheme must be considered positively.

- 6.6 Arun Council's strategy for housing delivery over the Plan period partly relies on the delivery of 421 units through existing Neighbourhood Plan allocations, 1,250 homes through Neighbourhood Plans or a Allocations DPD and 847 dwellings to come forward on windfall sites (Table 12.1 of the Local Plan refers). It is understood that the application site is located within the Bognor Regis Neighbourhood Plan area. The Neighbourhood Plan was made in November 2015, almost three years before the adoption of the new Arun Local Plan and publication of the NPPF.
- 6.7 Moving forward, and without a Site Allocations DPD or an updated Neighbourhood Plan in place (even in draft form), there remains some uncertainty as to how the housing requirements set out within Policy H SP1 will be met. With this in mind, it is our opinion that permission should be forthcoming for new housing where it can be demonstrated to comprise sustainable development.
- 6.8 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"*.
- 6.9 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. In any case, the 5YHLS position should not be considered determinative, given that the site is located within a built-up area, where the principle of development is accepted in broad planning policy terms.



b. Character and Visual Appearance

- 6.10 The existing dwelling comprises a two storey detached dwelling house, with further accommodation within its roofspace. This property will be demolished in order to facilitate the proposed development.
- 6.11 The application site is **not** located within a Conservation Area. The existing building is **not** listed and nor it is considered to be of any special architectural merit. Furthermore, we understand the property is **not** located on the Council's 'local list'.
- 6.12 Victoria Drive is varied in character, typically comprising a mixture of semi-detached and detached buildings, as well as flatted development. The application site is positioned adjacent to Victoria Drive, adjoining a two storey detached property to the south west side (No. 97 Victoria Drive) and a three storey building comprising 6 No. flats to the north east side (No. 101 Victoria Drive).
- 6.13 As detailed on the submitted street scene elevations (refer to **fig 4** and **5**), the proposed development would be three storeys in height, although would be set below the height of the adjoining flatted development; thus representing a transition between the two storey property to the south west and the three storey flatted development to the north east, when viewed from Victoria Drive.

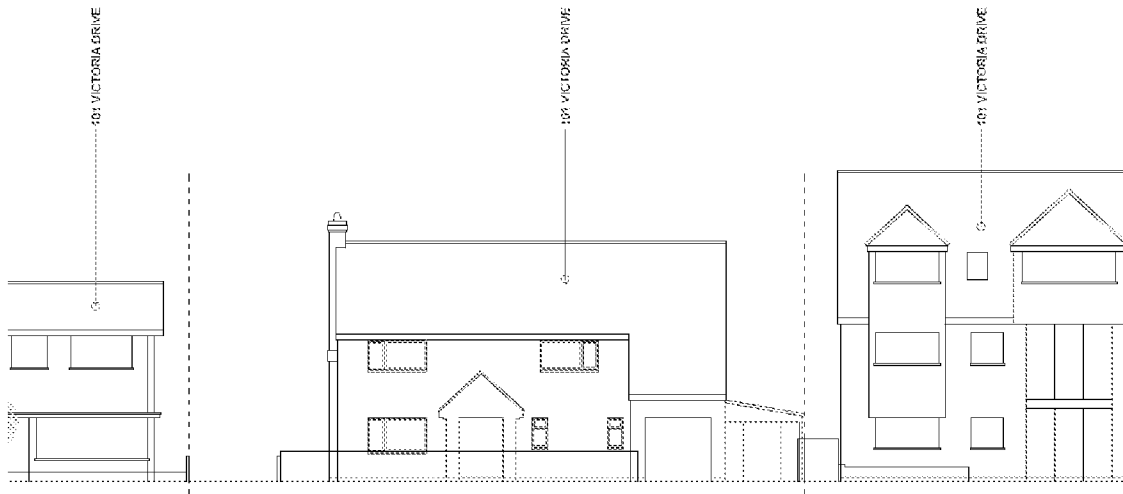
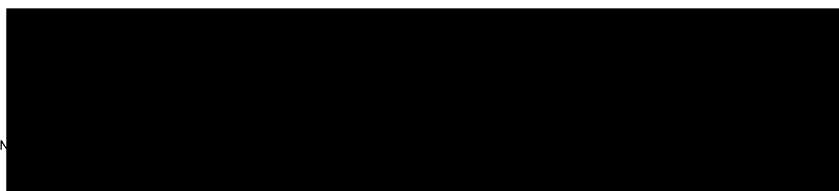


Fig 4. Extract from existing street scene



Fig 5. Extract from proposed street scene

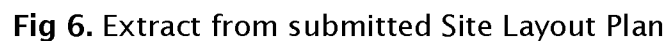
- 6.14 The proposed building would have a hipped roof, with pitched roof elements to the front elevation that would reflect similar design features to the neighbouring flatted development.
- 6.15 The proposal would be set back from the road, in a similar location to that existing. It would be set behind an existing brick wall and dense hedging.



- 6.16 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.
- 6.17 As outlined above, a clear planning precedent for flatted development in this location has been established; most notably with the adjoining flatted development to No. 101 Victoria Drive. 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 Amenities

- 6.18 The proposal would replace an existing building, with accommodation over three floors. As previously outlined, the property is located adjacent to Victoria Drive; positioned adjacent to a two storey detached property to the south west side (No. 97 Victoria Drive) and a three storey building comprising 6 No. flats to the north east side (No. 101 Victoria Drive). The site backs onto a pair of semi-detached properties located along Hillsboro Road.



- 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.
- 6.21 The proposed building would be set away from the neighbouring development to the north east side. In addition, this neighbouring building would be set back further within its plot, allowing the developments to be offset from one another and privacy to be further maintained.

- 6.22 In addition, there would be a large separation distance between the proposed development and No. 97 to the south west side; with the proposed access running in between the buildings. In addition, there is dense screening along the shared boundary. Further landscaping is proposed as part of this development and the applicant in this case would be happy for this to be conditioned accordingly.
- 6.23 The proposed development would utilize an existing access from Victoria Drive, which would run along the south western boundary and lead to a rear parking area. It is our view that due to the separation between this access and the neighbouring dwelling, together with the established hedging along this boundary, the proposal access and parking arrangement would be acceptable and would not cause demonstrable harm to the residential amenities of any this, or any other neighbouring property by way of noise or disturbance.
- 6.24 The proposal would have areas of both private and shared amenity space in the form of balconies and a communal gardens to the rear of the building. The proposed development amenity space to the rear of the site would be well screened from surrounding developments by existing tree/ hedgerow coverage. Further planting could of course be introduced if the Council considers this necessary.
- 6.25 The proposed parking area would be located to the rear of the site. This area will be well screened by tree/ hedgerow coverage. The car parking area will be constructed using a permeable surface, ensuring that the impact upon existing root structures is minimal.
- 6.26 Finally, the Government are placing increasing emphasis on achieving appropriate densities on sites such as this. Within Para. 123 of the Revised 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". 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.*

- 6.27 Taking into consideration all of the above, it is our view that the revised 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. Access and Parking Arrangements

- 6.28 Access to the highway will be via an established access point onto Victoria Drive.
- 6.29 As part of the development, new permeable paving and driveway is proposed. The proposed layout arrangement has 9 no. car parking spaces provided, one for each flat. The proposal will therefore provide ample parking and space to manoeuvre within the curtilage of the site, thus ensuring that parking does not spill out onto neighbouring roads.
- 6.30 Given that the proposed access route is existing and onto an established road, we are of the view that the proposal will not give rise to highway safety or car parking concerns, and the proposal would accord with Local Plan **policy T SP1** in that satisfactory access will be provided.
- 6.31 As such, it is our view that the proposal would be acceptable from a highway safety perspective.

6.32 Other Highways measures and improvements include a dedicated refuse store and collection point and secure cycle storage.

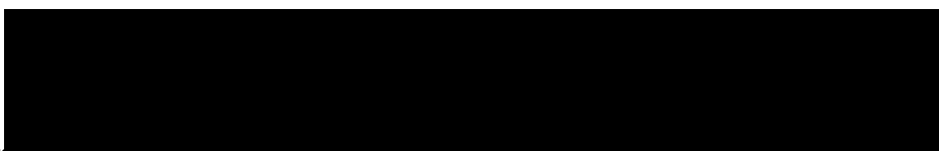
e. Space Standards

6.33 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. The Gross Internal floor area of each of the flats is detailed below:-

Flat 1	1-bed	50.4m ²
Flat 2	1-bed	50.1m ²
Flat 3	2-bed	63.8m ²
Flat 4	1-bed	50.4m ²
Flat 5	1-bed	50.1m ²
Flat 6	2-bed	63.8m ²
Flat 7	1-bed	50.4m ²
Flat 8	1-bed	50.1m ²
Flat 9	2-bed	63.8m ²

6.34 This document sets out that a one bedroom (one storey, 2 person) flat should have a minimum gross internal floor area of 50m². Each of the 6 x 1-bed flats would comply with these requirements. The standard for a 2-bed/3-person flat is 61 sqm, and again the proposals are compliant with this floor area requirement.

6.35 The proposal would also include an area of communal garden area, which is 101m² in size. Finally, 8 of the flats would be served by their own private balcony/ patio area.



6.36 It is view that the proposed development would be fully compliant with **Policy D DM2** of the Arun Local Plan and guidance set out within the Governments 'Technical Housing Standard's.

f. Pagham Harbour SPA

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

6.38 **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..."*

6.39 We can confirm that our client is agreeable to this financial contribution and a Unilateral Undertaking will be provided as part of this application submission in this respect. We trust that this is satisfactory to the LPA.

g. Other Matters

(i) Sustainable Development Summary

6.40 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

- 6.41 The appeal 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

- 6.42 The provision of 9 no. new flats (Net gain of 8 units) will make a notable contribution to the maintain the District's housing supply. 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 train 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

- 6.43 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.

7 CONCLUSIONS

- 7.1 The proposal seeks planning permission for the erection of a three storey building to provide flats (6 x 1-bed and 3 x 2-bed) with associated amenity areas and car parking. An existing residential property would be required to be demolished in order to facilitate the proposed development. The result is a net gain of 8 no. residential dwellings.
- 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 Bognor Regis Town Centre and its host of facilities and services.
- 7.4 The existing building is not Listed and nor is it considered to be of any special architectural merit. The site is not located within a Conservation Area. As such, there is considered no reasons for its retention.
- 7.5 The surrounding area is mixed in character, comprising a mixture of semi-detached and detached buildings; as well as flatted development. There are also other uses within the vicinity including residential nursing homes and a children's nursery.
- 7.6 The proposal would be set down below the height of the flatted development to the north east (No. 101 Victoria Drive), allowing a visual transition between the two storey property to the south west and these flats.

- 7.7 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.
- 7.8 The proposed development would be located in a similar position to that existing, set marginally back from Victoria Drive and offset with neighbouring development allowing a good relationship between adjoining buildings.
- 7.9 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. Nor would the proposed access and parking arrangement create any undue noise or disturbance.
- 7.10 Ample space for the parking and turning of vehicles would be provided on site. In addition, storage for cycle and refuse would be provided.
- 7.11 The application is identified as being within the Pagham Harbour Buffer Zone B (5km). Our client is agreeable to this financial contribution and a Unilateral Undertaking will be provided as part of this application submission in this respect.
- 7.12 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.

November 2018

