



**SMITH
SIMMONS**
& PARTNERS

PLANNING STATEMENT

**ACCOMPANYING A SECTION 73 APPLICATION FOR A MINOR MATERIAL AMENDMENT TO
BR/311/18/PL**

In connection with the erection of a 176 bedroom student accommodation building with associated hard & soft landscaping on land to the east of the University of Chichester Campus Bognor Regis PO21 1HR.

March 2022

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EXECUTIVE SUMMARY

This Statement accompanies a planning application submitted on behalf of the University of Chichester under Section 73 of the 1990 T & CP Act. It proposes minor material amendments to an existing detailed consent for a 176 bed student accommodation building with hard and soft landscaping on land at the Bognor Regis Campus. The full application was registered under LA Ref BR/311/18/PL and approved on 26th February 2020. It is an extant permission expiring on 26th February 2023.

The Section 73 application represents a first step in reconfiguring the accommodation at the Bognor Regis campus. It proposes revisions to the extant but unimplemented 176 bed consent with a different internal space configuration of rooms that will be more economic to build. The opportunity has been taken to improve fire escape routes. A different palette of external materials is proposed severing the link which the previously consented accommodation had with the 'Tech Park' academic teaching block to the south. The revised student accommodation is proposed as a new standalone building to 'anchor' additional clusters of student accommodation around it as potential future phases of development.

Additional on campus accommodation is critical to the University's future growth plans as it will enable further student intake growth which is currently restricted by bed numbers. Through 'Project Cornerstone' it is currently testing options for further expansion and the improvement of its residential offer at both its Bognor Regis and Chichester campus sites. Cornerstone and this application alike are therefore integral to the University's strategic growth journey, its competitiveness, wider campus plans and the quality of the student experience it provides.

The application and the potential it offers for future phases of development is a very attractive option to the University and one it would commit to fully in the immediate term. This and the ongoing benefit that potential additional phased accommodation would make to 5 year land supply in Arun District are important planning considerations for the application.

1.0 INTRODUCTION AND VALIDATION REQUIREMENTS

Introduction

- 1.1 On behalf of our client, the University of Chichester, this Statement accompanies a planning application submitted under Section 73 of the 1990 Act for proposed minor material amendments to an existing detailed consent for a 176 bed student accommodation building with hard and soft landscaping on land at the Bognor Regis Campus. The full application was registered under LA Ref BR/311/18/PL and approved on 26th February 2020. It is an extant permission expiring on 26th February 2023.
- 1.2 The Section 73 planning application carries a fee of £234.00. According to the Council's January 2020 Charging Schedule, residential development is CIL liable, but the definition of residential development does not include residential institutions, nor purpose built student accommodation.

Validation Requirements

- 1.3 CIL form 1 – Additional Information is provided for validation even though the proposal being purpose built student accommodation is not CIL liable. With regards to the Council's validation requirements, planning officers have informally advised the documents submitted in support of the last application can be resubmitted, and updated as appropriate. As the site has already been cleared it is agreed it has no biodiversity value. Rather than a full Phase 1 Habitat Survey officers have requested a Biodiversity Net Gain Statement with a review of the ecological enhancement measures conditioned in the consented proposal to assess whether they are still appropriate or require change.
- 1.4 A Fire Statement is submitted in accordance with the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021.
- 1.5 We note the last consent was granted subject to a Section 106 Planning Obligation requiring a fire and rescue contribution of £2,640.00 payable to the County on commencement of development. That Obligation contained a clause stating it shall relate to and bind any subsequent section 73 application subject to the right that the Council has the right to insist

on a new obligation if it considers it necessary to do so. We therefore welcome clarification from the Council that the same fire and rescue contribution will be payable and no deed of variation for a revised payment will be requested.

Documents and Plans

1.6 Legislation states a Section 73 application cannot be used to make minor material amendments to a proposal if there is no relevant condition in the permission listing the originally approved plans. Condition 2 of the original consent BR/311/18/PL did list plans and this Section 73 application is accompanied by the following substitute plans prepared by Architecture PLB and other consultant reports required for validation as follows:

- Site Location Plan
- Site Layout Plan
- Proposed Ground Floor Plan
- Proposed Upper Floor Plans (1 -5)
- Roof Plan
- Southwest and West Elevations
- Northwest and Northeast Elevations
- East and South Elevations
- Sections Plans (AA-BB, CC-DD, EE-FF)
- CGI of the proposed building
- Ground Investigation Report – WSP/PB
- Flood Risk Assessment - AECOM
- Foul & Surface Water Drainage Statement - AECOM
- Landscape Design Strategy & Masterplan – Lizard Landscape Design & Ecology
- Biodiversity Net Gain Statement – Lizard Landscape Design & Ecology
- Transport Assessment – WSP/PB
- Travel Plan – The University of Chichester
- Heritage Statement – Forum Heritage Services
- Energy Statement – Hoare Lea
- Lighting Assessment – Hoare Lea
- Design and Access Statement – Architecture PLB
- Planning Statement – Smith Simmons
- Fire Statement – Solas Realta

2.0 THE SITE AND THE UNIVERSITY OF CHICHESTER

The Site

- 2.1 The application site comprises approximately 0.9ha of land located on the east side of the University of Chichester Bognor Regis Campus. Access is from Felpham Way. The majority of the campus is within the Upper Bognor Road & Mead Lane (Hotham Park) Conservation Area and some of the campus buildings are listed grade II. The campus is within the 2km Buffer of the Bognor and Felpham Sites of Special Scientific Interest (SSSI) meaning any development likely to increase recreation pressure on the designated areas will require a modest financial contribution towards its mitigation.
- 2.2 The application site itself benefits from an extant but unimplemented consent for 176 student rooms and is outside but adjacent to the Conservation Area. The site has a 5m foul water sewer easement crossing it and is within flood zone 3 (FZ3) as defined by the Environment Agency flood maps. It is currently laid with car parking and access roads to the site access off Felpham Way. Land to the south of the application site is occupied by a newly constructed 'Tech Park' academic teaching block. This has a maximum height of around 25m to the top of the roof lantern over the atrium and 21m to the top of the external walls.
- 2.3 As far as planning policies are concerned, the 2018 adopted Arun Local Plan and 'made' 2015 Bognor Regis Neighbourhood Plan are relevant. As a general planning principle, Local Plan policy is supportive of Bognor as a University location and encourages the expansion and improvement of the academic and recreational facilities on the campus but in all cases, proposals will be weighed against other policy that protects heritage interest, visual and residential amenity of an area.

The University of Chichester

- 2.4 The University of Chichester (the University) operates from two locations, with a campus at College Lane in the neighbouring Chichester District and from the Bognor Regis campus at Upper Bognor Road in Arun District. It has experienced a period of repeated growth in applications over the past four years, which has coincided with a significant and sustained rise in The Guardian League Table positions (2022 – 21st, 2021 - 29th and 2020 – 73rd) and the launch of new curriculum areas including nursing, criminology, and law amongst others.

Between the 2019 and 2021 academic cycles, the University was the fourth fastest growing university in the country in terms of student applications received with a c. 50% increase over the period. The University expects additional growth to originate from a new pathway partnership with Holmes Education Group to create the University of Chichester International College (UCIC) with its first intake planned for September 2022.

- 2.5 The University driven economic growth already benefiting Arun District has been measured at around £47m economic output, 574 jobs and £25m of GVA equivalent to around 25-30% of the total impact across the whole West Sussex region. This is all confirmed in the Economic and Social Impact of the University of Chichester Report (December 2021) prepared by Viewforth Consulting Ltd attached as **Annex 1**.
- 2.6 To keep pace with its student demand however, the University is planning to further expand and improve the quality of its residential offer through Project Cornerstone, enabling further student intake growth which is currently restricted by bed numbers. Lack of on campus accommodation is one of the most significant challenges the University faces in achieving its future growth potential. Compared with off campus HMO accommodation where the level of support will be lower, more on campus accommodation will allow the University to provide more effective pastoral care and welfare support for its students as well. Cornerstone is therefore integral to the University's strategic growth journey, its competitiveness, wider campus plans and the quality of the student experience it provides.
- 2.7 The planned expansion is currently being tested for the University's Chichester campus and the Bognor Regis campus. Plainly any refocussing of student accommodation towards the Bognor campus will lead to greater economic benefits to the town.
- 2.8 This Section 73 application represents a first step in reconfiguring the accommodation at the Bognor Regis campus. It proposes revisions to the extant but unimplemented consent for the 176 bed student scheme with a different internal space configuration of rooms that will be more economic to build. The opportunity has been taken to improve fire escape routes. A different palette of external materials is proposed severing the link which the previously consented accommodation had with the 'Tech Park' academic teaching block to the south. The revised student accommodation is proposed as a new standalone building to 'anchor' additional clusters of student accommodation around it as potential future phases of development. These additional clusters are already the subject of a 'pre application enquiry'

with the Council to 'test' the capacity of the site and make a more efficient use of land within the existing campus for purpose built student accommodation. Consolidating development in this way would best realise spin off benefits to the local Bognor economy in the short to medium term.

3.0 RELEVANT PLANNING HISTORY

- 3.1 Planning permission was granted in July 2016 (LA Ref BR/54/16/PL) for the erection of additional teaching accommodation and the first phase of a student accommodation block on land comprising 2.82ha at the east end of the Bognor campus. The student block as submitted proposed 171 bed spaces but was eventually approved with 136 bed spaces. The consented teaching accommodation is now constructed and occupied. In implementing the consent it secured the student accommodation even though this has not been constructed.
- 3.2 The University masterplan anticipated a future second phase of student accommodation with 2 further accommodation blocks. The Council made clear however that separate detailed applications would be required should the University progress with the second phase works.
- 3.3 In February 2020 an alternative proposal on 0.9ha (LA Ref BR/311/18/PL) for a replacement 176-bedroom student accommodation building with associated hard & soft landscaping was granted consent. It is an extant unimplemented consent expiring on 26th February 2023. The 176-bed accommodation building comprises a mix of 5 and 6 storeys with access from Felpham Way. The approved building has an inverted 'L' shaped footprint. Block A is 6 storeys with 92 bedrooms and Block B has 5 storeys with 84 bedrooms. Like the earlier 2016 consent, it allows for 2 future accommodation blocks on land to the south-west and east as a potential second phase.
- 3.4 Compared to the 2016 proposal, it added 40 student rooms and an increase in height at the west end of the building of between 1 and 2 storeys (approximately 5.5m higher). The total length (NW corner to SE corner) increased from 66.5m to 71m and materials were changed to accord with the approved teaching accommodation building (now constructed) to the south.

Consultee Comments

- 3.5 A copy of the planning officer report for the application is attached as **Annex 2**. Bognor Town Council said although it was keen to support the University, they wished to object to the design due to the impact the unsympathetic and austere design will have on its setting, adjacent to both listed buildings and a Conservation Area.

- 3.6 The Bognor Regis Regeneration Board supported the proposal noting that it provided student accommodation on the campus rather than in the town and based on the previous 2016 proposal understood the increase in student numbers would almost double the economic impact in the town to an estimated £69million per annum. West Sussex County Council raised no concerns to the vehicle generation potential of the application and was content for a £2,640 contribution towards fire service infrastructure in Bognor Regis. This was subsequently secured in a section 106 planning obligation.
- 3.7 With regards to residential amenity, officers comment the building will be 37m at the closest point from the southeast corner of 100 Hook Lane and 45m at the closest point from the rear of the indicative position of the proposed dwellings in the rear of 98/100 Hook Lane. It is not considered, at these distances, the building would have an adverse impact on outlook resulting in an unduly oppressive living environment.
- 3.8 On heritage matters, planning officers said the site was not a heritage asset. However, the edge of the site was within 10-15m of the "Upper Bognor Road & Mead Lane Conservation Area" and the curtilage of thirteen Grade I and II Listed Buildings & Structures were within the campus. The proposal therefore had the potential to affect the setting of Listed Buildings and the setting of the Conservation Area but overall, it was concluded that harm to heritage assets was less than substantial and the wider public benefits of the proposal outweighed that harm.
- 3.9 The wider public benefits of increased student spending on the local Bognor economy, reducing the number of HMO's and demand for student housing off campus releasing more stock for family housing and the direct benefits of additional accommodation to the University all apply with equal force to this section 73 proposal.

The Section 73 Proposal

- 3.10 The Section 73 application proposes a minor material amendment to the BR/311/18/PL 176 bed consent before it expires. The amendments have been discussed with a planning officer of the Council on 14th December 2021 when it was confirmed the suggested changes would be accepted as a minor material amendment to the extant consent. The revisions do not alter the number of beds and there is only a very minor change to the footprint and silhouette of the building. The revised footprint observes the parameters established by the consented

scheme in terms of height and separation distances with the nearest residential properties at Hook Lane and Broadmead. Changes are proposed to the internal arrangement of accommodation, the external appearance, and use of materials. The amendments can all be carried out with no changes to the description of the development in the existing consent.

- 3.11 In light of the objections raised by the Bognor Town Council to the earlier scheme, a presentation of work in progress for the section 73 proposal was made to the Council in February 2022. Members comments that a lighter coloured brick would be welcomed have informed the proposed use of materials in the Section 73 proposal as now submitted.
- 3.12 The amendments proposed in the Section 73 application are described in more detail in section 5 of this Statement and in the Design and Access Statement of PLB Architecture.

4.0 PLANNING POLICY CONSIDERATIONS

National Policy

- 4.1 National planning policy in the NPPF (July 2021) is relevant to the proposal. In general terms it confirms the statutory status of the development plan is the starting point for decision-making on planning applications but also applies a presumption in favour of sustainable development (paragraph 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan unless other policies that protect areas or assets of particular importance provides a clear reason for refusing the development proposed. In the case of this section 73 application the adjacent Conservation Area is a designated Heritage Asset and will be a material consideration in its determination. Paragraph 200 of the NPPF says where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.2 Paragraph 60 of the NPPF states that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. It says that delivering a sufficient supply of homes applies to all groups in the community including students (paragraph 62).
- 4.3 In assessing the need for student accommodation, the on-line Planning Practice Guidance (PPG) says authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area (Paragraph: 004 Reference ID: 67-004-20190722).
- 4.4 The PPG Paragraph: 034 Reference ID: 68-034-20190722 also confirms that student accommodation, whether it consists of communal halls of residence or self-contained

dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply. This is an important consideration for the section 73 application because Arun District currently has a significant housing land supply shortfall standing at just 3.3 years. As explained at paragraph 2.8 earlier, the revisions in the application improve on the consented scheme making it more economic to build and present an opportunity to consolidate and 'anchor' additional student accommodation around it in future phases. This would be a very attractive option to the University and one it would commit to fully in the immediate term. This and the ongoing benefit that potential additional phased accommodation would make to 5 year land supply in Arun District are important planning considerations for the application.

- 4.5 The PPG offers guidance on flexible options for planning permission. It says an application can be made under section 73 of the Town and Country Planning Act 1990 to vary or remove conditions associated with a planning permission. One of the uses of a section 73 application is to seek a minor material amendment, where there is a relevant condition that can be varied. There is no statutory definition of a 'minor material amendment' but it is likely to include any amendment where its scale and/or nature results in a development which is not substantially different from the one which has been approved.
- 4.6 The PPG says pre-application discussions will be useful to judge the appropriateness of a section 73 in advance of an application being submitted. If the original permission was subject to a planning obligation, then this may need to be the subject of a deed of variation.
- 4.7 The applicant did discuss the proposed amendments in the Section 73 application before it was submitted. Advice is welcomed on whether the former planning obligation requiring a contribution towards fire and rescue infrastructure needs to be revised with a deed of variation.

Arun District Local Plan 2018

- 4.8 There should be no local plan policies raised against the proposal in principle as the last 176 bed scheme was found to be wholly policy compliant when it was last granted planning consent in 2020. The site is located in countryside outside a settlement policy boundary but it is also within the curtilage of the existing University campus. Policy C SP1 is generally resistant of development in countryside unless development is in accordance with other

policies of the plan. Policy EMP SP2 states the Council encourages the expansion and improvement of facilities for the University and SD SP1a promotes and enables development that supports Bognor Regis as a University Campus location. Since the site is within the campus and the student accommodation will improve facilities and support Bognor as a University campus location, the proposal is acceptable in principle.

4.9 With regards to development management policies of the Local Plan, the following are relevant to the Section 73 application:

- DDM1 D DM1 Aspects of form and design quality
- DDM2 D DM2 Internal space standards
- DSP1 D SP1 Design
- ECCSP1 ECC SP1 Adapting to Climate Change
- ECCSP2 ECC SP2 Energy and climate change mitigation
- EMPSP2 EMP SP2 Economic Growth Areas
- INFSP1 INF SP1 Infrastructure provision and implementation
- QEDM1 QE DM1 Noise Pollution
- QEDM2 QE DM2 Light pollution
- QESP1 QE SP1 Quality of the Environment
- SDSP1 SD SP1 Sustainable Development
- SDSP1A SD SP1a Strategic Approach
- SDSP2 SD SP2 Built-up Area Boundary
- CSP1 C SP1 Countryside
- HERSP1 HER SP1 The Historic Environment
- HERDM1 HER DM1 Listed Buildings
- HERDM3 HER DM3 Conservation Areas
- TDM1 T DM1 Sustainable Travel and Public Rights of Way
- TSP1 T SP1 Transport and Development
- WDM2 W DM2 Flood Risk
- WDM3 W DM3 Sustainable Urban Drainage Systems
- WSP1 W SP1 Water
- WMDM1 WM DM1 Waste Management
- ENVDM1 ENV DM1 Designated Sites of Biodiversity or geographical importance
- ENVDM5 ENV DM5 Development and biodiversity
- ENVSP1 ENV SP1 Natural Environment

- 4.10 All of the policy considerations were addressed in connection with the consented scheme and found to be in compliance. The minor amendments proposed in this application will not cause conflict with any of the policies.

Bognor Regis Neighbourhood Plan (2015)

- 4.11 The 'made' Bognor Regis Neighbourhood Plan (2015) was prepared against the now expired 2003 Local Plan rather than the current adopted 2018 version. However, as adopted policy it carries weight for the application proposal. Policy 8(J) applies to the Bognor Regis campus and encourages additional student accommodation. It states:

'This Neighbourhood Plan promotes a high quality and low carbon education, research and employment-led development at this campus location including co-working spaces and an appropriate amount of additional student housing. The provision of sustainable modes of transport and pleasant pedestrian and cycle links to the town centre and seafront together with safe and suitable access arrangements is supported. Any development should provide future access to the existing sewerage infrastructure as required by the relevant authorities'.

Upper Bognor Road Conservation Area

- 4.12 The majority of the Bognor Campus falls within the Upper Bognor Road Conservation Area and includes several listed buildings. The site of the consented 'Tech Park' and the site the subject of this section 73 application are both outside but immediately adjacent the designated area. In approving the 176 bed student proposal, officers said the site was not a heritage asset and that is a constant for this Section 73 proposal. There are no other changes to the scale bulk or massing of the consented building, only changes to the external appearance of the building from the use of different materials. The Heritage Statement of Forum Heritage Services has concluded there is no additional harm to the setting of the Conservation Area and being less than substantial, the wider public benefits of the proposal still outweighs that harm.

5.0 PROPOSED AMENDMENTS AND RECOMMENDATION

- 5.1 The amendments set out in this Section 73 application do not materially alter the building footprint, scale, height, or the separation distances with the nearest residential properties at Hook Lane and Broadmead in the consented scheme. Changes are just proposed to the internal arrangement of accommodation, the external appearance, and use of materials. The amendments can all be carried out with no changes to the description of the development in the existing consent as the number of bedrooms (176 ensuite) remains the same.

Scale and Layout

- 5.2 As explained in the Design and Access Statement of PLB Architecture, the changes to the internal arrangement of accommodation results in an GIA of 5742m², 225m² more than the consented GIA of 5517m². The increase is due in the main to internal circulation space. The 176 bedrooms are now arranged in 15 no. 8 bed, 4 no. 9 bed and 2 no. 10 bed clusters. All rooms are wheelchair accessible and are approximately 12.5m² (plus 2.4m² ensuite bathroom) meeting the council's internal space standards for student accommodation.
- 5.3 The footprint of the building at the north-west end has been pulled back marginally increasing the separation distances with residential properties at Hook Lane. Otherwise the footprint mirrors the consented scheme. It is no larger than the existing. The height of the building has not been increased and is lower in parts as a result of changes to the internal staircases. The overshadowing studies submitted with the consented scheme remain valid and these have not therefore been submitted for the current proposal.

Materials

- 5.4 A different palette of external materials is proposed severing the link which the previously consented accommodation had with the 'Tech Park' academic teaching block to the south. The appearance of the revised accommodation building is deliberately more residential in appearance and uses a muted coloured brick to pick up the colour and appearance of the existing accommodation blocks to the west. The building has a more subordinate and 'quieter' relationship with the Conservation Area.
- 5.5 The materials themselves comprise:

- External Wall - red/orange facing brick with soldier course detailing at slab levels and 'rusticated' recessed brick detailing at base
- Windows - bronze coloured metal frames
- Ventilation louvres - bronze coloured perforated metal panels
- Spandrel panels - back painted glass spandrels
- Roof - flat roof with membrane
- Coping - bronze coloured metal coping

Heritage Considerations

- 5.6 As explained earlier, the Heritage Statement has not identified any additional harm to the designated heritage assets comprising the Conservation Area and the setting of the listed buildings from the changes in materials. The Statement actually concludes the amendments to the scheme in terms of form and materiality will decrease impact on the identified heritage assets resulting in lower levels of less than substantial harm.

Sustainability and Energy Performance

- 5.7 The Energy Statement of Hoare Lee shows the revised scheme achieves a reduction in carbon emissions of 36% over a Part L 2013 compliant development (SAP 2012) and exceeds the Local Plan policy ECC SP2 requirements for at least 10% of the total required energy from renewable or low carbon energy generation on site. Taking a 'fabric first' approach with natural and energy efficient mechanical ventilation, low energy lighting and occupancy controls, air source heat pumps (in lieu of gas boilers) and PV panels, it shows a potential predicted energy percentage from renewables of just over 32% for regulated energy consumption.

Access and Parking

- 5.8 There are no changes to the access arrangements for the site. With the exception of disabled occupiers of the student accommodation, students will not be allowed to keep a car on site and the existing car parking arrangements in the 176 bed scheme are mirrored in the section 73 proposal. External servicing areas and bin stores have been provided in accordance with the usual standards of provision. Adequate access and turning for emergency and refuse vehicles is provided to the requirements of the Local Highway Authority. More detail on the

transportation and access aspects of the proposal are set out in the Travel Plan, the Design and Access Statement of PLB Architecture and the Transport Assessment of WSP/PB.

Flood & Drainage

- 5.9 Sustainable Drainage Systems will be required to ensure that the Proposed Development avoids any increase in the peak rate of surface water discharge. An outline drainage strategy has been developed to demonstrate that sufficient space is available within the development to attenuate within a detention basin and discharge at 2l/s for all events up to and including the 1 in 100 year event with a 40% allowance for climate change. The SuDS features that have been selected include a detention basin in order to maximise opportunities for landscape and ecological enhancement. The attenuated discharge will be conveyed to the provide 300mm pipe southeast of the proposed building.
- 5.10 The proposed foul drainage network which serves the Proposed Development will include pipes and chambers around the perimeter of the proposed building and will be discharging to S106/SWFW 4604 manhole to the south of the proposed building.
- 5.11 A raised boardwalk is retained to provide flood resilient access given the location of the site in FZ3.

Landscape and Ecology

- 5.12 The Landscape Design Strategy and Masterplan of Lizard Landscape shows the retained feature boardwalk to the main entrance crossing the attenuation area. An additional access from the northern apex of the building offers further circulation to proposed facilities (cycle storage, refuse storage, bus stop) and connectivity to the existing pedestrian network. Two fire exits are provided to the west of the western wing and south of the eastern wing.
- 5.13 The proposed attenuation basin would be enhanced with wildflower grassland and native shrubs. The building perimeter would be buffered with native shrub planting with swathes of wildflower grassland to the north and east of the building. An area of ornamental planting is shown at the frontage to the Cycle and Bin Store along the existing road, supplemented by feature treeline planting. The Biodiversity Gain Statement calculates the planting design

exceeds the targeted 10% net biodiversity gain (c.17%) as specified within the Environmental Bill 2021.

Fire Safety

- 5.14 A Fire Statement is submitted in accordance with the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 and Planning Gateway One. This ensures fire safety matters as they relate to land use planning are considered at the planning stage for relevant high-rise residential buildings. Qualifying buildings are those which contain two or more dwellings, or educational accommodation, and meet the height condition of 18m or more, or 7 or more storeys.
- 5.15 With regards to the proposed building, the Statement of Solas Realta confirms it has three staircases, one at either end of the building and one centrally located alongside two passenger lifts. It explains the means of warning and escape strategy and the relevant BS 9991 Standards for the internal cluster flat arrangements. It sets out the key fire safety challenges for the scheme and how the building design achieves an acceptable level of fire safety, commensurate with the requirements of Part B of the Building Regulations 2010.

Recommendation

- 5.16 For all the above reasons the development proposals in this Section 73 application accord with the Development Plan and in the absence of policy harm to any areas or assets of particular importance we trust planning consent can be granted consent at the earliest opportunity.