



PLANNING STATEMENT

MARCH 2021

SITE: LAND REAR OF 22 NEVILLE ROAD, BOGNOR REGIS, WEST SUSSEX, PO22 8BN

PROJECT: ERECTION OF A SINGLE STOREY ONE BED DWELLING HOUSE WITH PRIVATE AMENITY SPACE, CAR PARKING SPACE AND REFUSE/RECYCLING STORE

APPLICANT: MR SIMON ROYALL

LPA: ARUN DISTRICT COUNCIL

1.0 EXECUTIVE SUMMARY

- 1.1.1 There is common ground between the applicant and the Local Planning Authority in respect of the fact that there is an identified and unaddressed housing shortage within the district at the present time. The applicant has not needed to explain that in any great detail because the latest Annual Monitoring Report (2019/20) shows that there is a substantial need for housing. It states that the Local Planning Authority can only provide sufficient deliverable sites to meet its need over the next 3.3 years. This is considerably shorter than the required 5 years.
- 1.1.2 The Housing Delivery Test for the period 2017 to 2020 shows that the situation is even more critical when looking at how the district has been able to meet a lesser housing requirement over the last three years. The rate of housing completions has steadily dropped against the backdrop of an ever increasing housing requirement. It is therefore evidentially the case that there is a growing shortfall of housing within the district, and this is placing pressure on affordability, and causing increased social and economic stress.
- 1.1.3 Furthermore, it is common ground between the applicant and the Local Planning Authority that there are not enough sites identified in the current plan to address the need and the shortfall that is accumulating on a daily basis whilst need is outstripping completions. It is therefore clear that there needs to be a concerted effort by the Local Planning Authority to increase its housing completions, and in view of the fact that this cannot at present be achieved through strategic housing allocations (as evidenced on the last three years completions), the authority will need to look elsewhere, notably at what can be achieved through the small-scale private sector which drives a large proportion of the windfalls.
- 1.1.4 The site the subject of this application is a typical windfall site. It is an undesignated piece of land within the urban area that is owned by a private individual. The land has the potential to provide a new residential dwelling, and this will be evidenced through the submission documents comprising of this application. These show that a small residential development can be provided whilst achieving a satisfactory level of amenity for future occupiers and neighbouring residential properties, it can be provided with safe access to the highway and in an accessible location, moreover its design can retain key attributes of the character of the area with causing minimum harm to the urban context in which it is located.

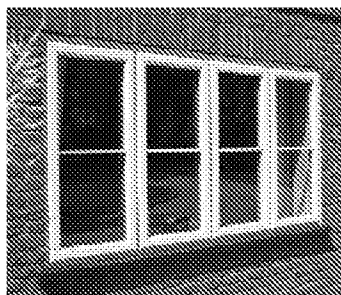
- 1.1.5 We ask that the authority recognises the expediency of the need to provide housing in sustainable locations such as this and grants full planning permission on the basis of the residential development of the site to provide a new home in the heart of the urban area of Bognor Regis. For every new home that is built within a sustainable and accessible part of the urban area, that reflects one less home that will need to be built in the countryside. This is a matter of fact derived out of the housing land supply position of Arun District Council.
- 1.1.6 It is therefore imperative that we make the most effective use of the land within the settlements that exist at the moment and protect the countryside to the best extent that we can. Whilst this is only a small contribution to the housing stock within the district, owing to the housing land supply shortage at the present time, it is a valuable contribution that should be afforded substantial weight. We therefore request that planning permission be approved.

*James Hutchison BA MA MRTPI
Planning Director
Corbil Estates & Planning Ltd*

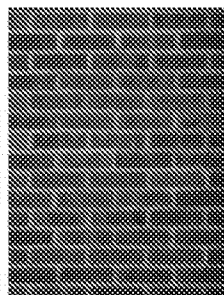
25 March 2021

2.0 THE PROPOSAL

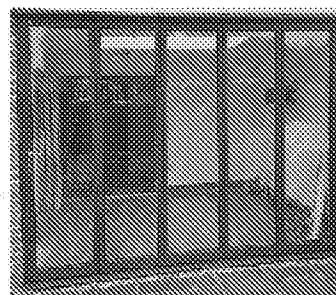
- 2.1.1 This is an application for full planning permission for the erection of a detached single storey dwelling house. It is to be sited on an existing vacant plot of land that has been formed from the rear garden area of the flats at 22 Neville Road.
- 2.1.2 The proposed dwelling house comprises of a one bedroom property designed for non-family occupation. It features a double bedroom with a CLG compliant two person bed space at 13.2m² and has a total gross internal floor area of 50.05m².
- 2.1.3 The outside area within the curtilage of the new dwelling house comprises of one parking space measuring 3.0m x 5.0m, an enclosed and sheltered cycle store, and a private garden space to the south of the building which covers an area of 43.7m². A refuse and recycling store is positioned on the northern side of the house next to the private driveway.
- 2.1.4 The new dwelling house would have pedestrian and vehicular access from the existing private driveway that leads off the eastern side of Neville Road. This private driveway is in the applicant's ownership and currently only facilitates access to the rear parking area of no.24. The existing flats at no.22 currently park on-street.
- 2.1.5 The application includes substantial soft landscaping proposals which will provide screening along the east and western sides of the plot. This land is within the control and ownership of the applicant, as indicated by the blue line on the location plan.
- 2.1.6 The design of the proposed dwelling house has been restricted in its height by the flat roof style of the building at a height of no more than 2.7m above existing ground level. The simple design of the dwelling house is completed with a decorative string course below the parapet.
- 2.1.7 The elevations will be of brick construction with materials to match the host building. The windows will be UPVc framed with the exception of the charcoal grey aluminium bifold doors on the rear elevation. These doors will slide back to allow sunlight into the main living area.



White UPVc windows to match
host building



Brick to match host
building



Charcoal grey aluminium bifold
doors to south elevation

- 2.1.8 The following plans and drawings complete the documents for this planning application:

CBL-0920234-L101	Location Plan
CBL-0920234-ES101	Existing Site Plan
CBL-0920234-PS101	Proposed Site Plan
CBL-0920234-P101	Proposed Ground Floor Layout
CBL-0920234-P102	Proposed Roof Layout
CBL-0920234-P103	Proposed Front Elevation
CBL-0920234-P104	Proposed Rear Elevation
CBL-0920234-P105	Proposed West Elevation
CBL-0920234-P106	Proposed East Elevation

3.0 SITE DESCRIPTION

- 3.1.1 The application site comprises of a rectangular piece of land measuring 238.76m² (0.024ha) and includes a private driveway within the applicant's ownership that connects the residential curtilage of the new dwelling house with the public highway.
- 3.1.2 The site has been formed through the sub-division of the existing gardens from the two flats in the host building (no.22) which fronts onto Neville Road to the west. The site is bordered by 1.8m closed boarded fencing and has no discernible change in level.
- 3.1.3 To the north of the application site is the car parking area to the flats at no.24 Neville Road. To the south of the application site is a residential garden and parking area serving the flats at no.20 Neville Road. To the east of the site is the residential garden of 15 Glenwood Avenue.
- 3.1.4 There are no trees or significant vegetation on or around the application site that would be affected by any development. The site is located within the 5km buffer zone of the Pagham Harbour Special Protection Area.
- 3.1.5 The site is positioned in a close proximity to nearby publicly owned recreational and open space areas and is close to the fringe of the Bognor Regis Economic Growth Area. The site is within the urban area and defined settlement area of Bognor Regis.



- 3.1.6 The site is not affected by any statutory or local listings. It is not within a conservation area. The site is located within flood zone 1 (as shown on the EA flood map below).



4.0 RELEVANT PLANNING POLICY

4.1 *Statutory Legislation*

4.1.1 The following statutory instruments form the legislative basis for the lawful processing and determination of a planning application made to the Local Planning Authority:

- Town and Country Planning Act 1990
- Planning and Compulsory Purchase Order 2004

4.2 *National Planning Policy Framework (NPPF)*

4.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 establishes that planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Section 1 of the National Planning Policy Framework (NPPF), which was published in February 2019, sets out that the NPPF must be taken into account in the preparation of development plans, and that it represents government policy that is material in planning decisions.

4.2.2 Section 2 of the NPPF establishes the government's policy on achieving sustainable development. Within this section is the definition of sustainable development under paragraph 8, and the presumption in favour of sustainable development under paragraph 11. In instances where a Local Planning Authority's development plan policies are out of date or absent, paragraph 11 (d) of the NPPF is applied in the determination of the application.

For decision-taking this means:

... (d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, 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 proposed⁶; 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.*

⁷ *This include, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73) or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.*

4.2.3 We have set out within section 6.1 the grounds upon which we allege that the Local Planning Authority's policies relevant to the supply of housing are out of date. Essentially, this relates to the inability of the Local Planning Authority to be able to demonstrate a future five year supply of housing delivery, and also on the basis that the Local Planning Authority's latest results in the Housing Delivery Test (January 2020) showed that only 61% of the required amount of housing was completed within the district between 2017 and 2020.

4.2.4 Section 11 of the NPPF is also highly relevant to an application of this nature, which proposes a more efficient use of land within the urban area. It requires that planning decisions should promote the more effective use of land within the urban area. We would specifically draw

officer's attention to paragraph 123, which seeks to maintain and enhance the density of development in instances where there is an existing shortage of land for meeting identified housing needs. Paragraph 123 (c) states:

- (c) *local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

4.3 Arun District Council Local Plan (2018)

- 4.3.1 The development plan for the purposes of decision-making in Arun comprises of the adopted Local Plan in 2018. Those policies considered to be relevant to this application are contained in the table below (please note that this list is not exhaustive).

Arun District Council – Local Plan (2018)	
Policy Ref:	Policy Description:
SD SP1	Sustainable Development
SD SP1A	Strategic Approach
SD SP2	Built-Up Area Boundary
H SP1	The Housing Requirement
H DM1	Housing Mix
D SP1	Design
D DM1	Aspects of Form and Design Quality
D DM2	Internal Space Standards
ECC SP1	Adapting to Climate Change
ECC SP2	Energy and Climate Change Mitigation
HWB SP1	Health and Wellbeing
T SP1	Transport
ENV SP1	Natural Environment
ENV DM1	Designated Sites of biodiversity or geological importance
ENV DM5	Development and Biodiversity
W DM1	Water Supply and Quality
W DM3	Sustainable Urban Drainage Systems
WM DM1	Waste Management

4.4 Arun District Council – Supplementary Planning Documents

- 4.4.1 The Local Planning Authority has published the following guidance documents:

- Arun District Design Guide (adopted January 2021)
- Parking Standard (adopted January 2020)

5.0 RELEVANT PLANNING HISTORY

5.1 *22 Neville Road*

5.1.1 The application site contains no relevant or recent planning history.

5.2 *24 Neville Road (to the north)*

5.2.1 This neighbouring property has historically been converted into flats. There are no planning records on the public register.

5.3 *20 Neville Road (to the south)*

5.3.1 BR/209/94 - Approval of reserved matters following Outline Planning Permission BR/62/93 for erection of 2no. 2 bedroom and 8no.1 bedroom flats with parking.

Granted on 23 September 1994.

6.0 PLANNING ASSESSMENT

6.1 *Housing Need*

- 6.1.1 Paragraph 73 of the NPPF requires Local Planning Authorities to 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. The supply of specific deliverable sites should include a buffer of 5%, 10% or 20% dependent on past housing completions against the housing requirement figure. A 20% buffer should be applied where the Housing Delivery Test has indicated that completions fell to below 85% of the housing requirement, and this reflects a persistent under-delivery.
- 6.1.2 In the case of Arun District Council, policy H SP1 of the Local Plan (2018) sets out a stepped housing requirement figure which increases incrementally throughout the 20 year period, with a drop in the last five years. We have used the latest information in the Local Planning Authority's Annual Monitoring Report (2019/20) dated December 2020 to demonstrate the current housing land supply position for the period 2020-2024. The adopted requirement includes 1 year at 1,120 dpa and 4 years at 1,310 dpa. Added to this figure is the shortfall of 2,039 from previous years under-delivery. The total housing requirement for the five year period 2020-2024 is therefore 8,399 dwellings.
- 6.1.3 In order to calculate the extent of buffer that needs to be added to the above housing requirement figure, we have reverted to the government's Housing Delivery Test results for 2017-2020 (published in January 2021). These are provided below:

	2017-2018	2018-2019	2019-2020	Total	%
Housing Requirement	947	1,120	1,025	3,092	61
Housing Completions	704	660	515	1,879	

- 6.1.4 Paragraph 73(c) footnote ³⁹ states that from November 2018, where a Local Planning Authority fails to achieve 85% or more of its housing completions against the identified housing requirement, the 20% buffer shall be added for under-delivery. This takes the total housing requirement for the five year period 2020-2024 to 10,079 dwellings, which disaggregated down across each year represents a requirement for 2,016 dpa.
- 6.1.5 We have not sought to interrogate the Local Planning Authority's intended housing supply for the five year period 2020-2024 for the simple reason that there is no need to look into this matter any further for the purposes of this application. The AMR 2019-20 shows a housing supply of 6,599 dwellings over the five year period. This equates to 1,320 dpa, a number which is substantially lower than the identified housing requirement, and which represents a 3.3 year supply.
- 6.1.6 It is also worth noting that, from the previous performance as evidenced in the above HDT results, the Local Planning Authority is not getting anywhere close to their anticipated 1,320 dpa for the next five year period with the average annual completions at only 626 dpa. It is inconceivable to think that the substantial deficit of housing that is building up in Arun is likely to be met at anytime in the near future, and there are no further strategic allocations identified by the Local Planning Authority to address the growing shortfall.
- 6.1.7 The latest available evidence within the HDT shows that as the housing requirement is consistently increasing with more dwellings being added to the growing shortfall, housing completions within the district have steadily decreased over the past three years. There is no new Local Plan on the horizon and no future means by which to show that this Local Planning Authority has got its housing needs under control.

6.1.8 Quite clearly, by reason of the disparity between the housing requirement figure in the Local Plan, and the housing land supply deficit, the Local Planning Authority's housing policies are out of date. In addition, with a past delivery of less than 75% of the housing requirement, the HDT has been failed. The consequence of both of these factors is that the presumption in favour of sustainable development is to be applied to the consideration of any development for new housing.

6.1.9 In accordance with paragraph 11(d)(ii) of the NPPF, planning permission should therefore be granted *unless 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*. There are no specific policies in this case whereby a conflict would disengage the presumption, and there is every reason in view of the enormity of the housing deficit within the district and absence of any clear direction out of the current shortage, to grant planning permission.

6.2 Character of the Area

6.2.1 The application site is unconstrained in terms of any policy designations. The site is located within the settlement constraints of the urban area, and so therefore falls on land that would be considered to be appropriate for development in principle. Whilst the site is clearly greenfield and does not represent previously developed land, it is not contrary to policy to develop such sites provided that the proposal amounts to sustainable development.

6.2.2 The character of the area can be defined as being primarily residential in nature, with the most localised area around the application site almost wholly comprising of small residential dwellings in terms of one and two bedroom flats. The host building is split into 2 x two bedroom flats. No. 24 is split into two bedroom flats and no.20 (Levine Court) is a flatted development built pursuant to planning permission ref: BR/209/94 (see paragraph 5.3 above).

6.2.3 The street scene of Neville Road is depicted by two storey buildings, however a review of the land behind these buildings shows a very fragmented and dispersed mix of buildings and parking areas that service the flats at the front of the plots. For example, Levine Court to the south of the application site has its area behind the building dedicated to a parking and garaging area, and no.24 to the north of the site is mostly put to hard-standing for the parking of cars for the flats at the front of the site. This is shown in the image below.



6.2.4 The image above shows buildings depicted in a light blue outline and parking areas depicted by a purple outline. It is clear from this analysis of the surrounding area that there is no strong identity in terms of houses and gardens, and instead there is quite an eclectic range of previously developed land in the form of buildings and parking areas. It is on this basis that

the proposed development of land rear of 22 Neville Road will not have a harmful impact and could not be said to be out of character to the surrounding area.

- 6.2.5 The proposed development seeks to maximise and make the most efficient use of land to the rear of 22 Neville Road having regard to the fact that there is no defined context to this part of the street, and on this basis, there would not be a harmful impact arising from a suitably defined and designed backland development. The applicant recognises that there are no two storey buildings along the rear of properties on this side of Neville Road, and this has been reflected in the design of the proposed building, which is a low level single storey dwelling.



- 6.2.6 The above image shows the front elevation of the dwelling house that has a northerly aspect onto the private driveway to the rear of nos. 22 and 24 Neville Road. The total height of the building has been kept low and so as to provide an internal ceiling height of 2.3m throughout the dwelling but with a total height to the parapet of 2.7m. The height of the building would therefore be no more significant than an average garden outbuilding.

- 6.2.7 With 2.0m high closed boarded fencing around the perimeter of the curtilage, and dense soft landscaping buffers, only the parapet would be discernible to neighbouring residential properties. Owing to the position of the building being set-back from the edge of the private driveway, the proposed development will not be visible from any public vantage point along Neville Road. Consequently, in the absence of visibility, there could not be any visual impact arising from the development, and consequently no harm would be created to the street scene views along Neville Road.

- 6.2.8 The appearance of the proposed building has been designed on the basis of a simple contemporary form of architecture, and we supply some illustrative material below to show how low level and/or the simple use of brick can be effective by itself or in combination:



- 6.2.9 The low level height and scale of the building is considered to be an appropriate design response to the backland position of the proposed development. One would naturally find all manner of single storey structures and buildings to the rear of the more dominant and higher buildings that front onto the main highway. The proposed subordinate design of a contemporary mews style building is reflective of the hierarchy of buildings in the street.
- 6.2.10 We have provided details of the proposed materials under paragraph 2.1.7 above.

6.3 *Amenity of Future Occupiers*

- 6.3.1 The proposed development proposes a one bedroom (2 person) dwelling house on a single storey. The nationally described space standards (NDSS) require that such a dwelling house should be provided with a floor space (GIA) of at least 50m², and its bedroom should have a minimum floor space of 11.5m² and be at least 2.75m wide. In comparison, we can confirm that the proposed development the subject of this application has a floor space of 50.05m², and a double bedroom of 13.2m² (3.0m x 4.4m). It is therefore fully compliant.
- 6.3.2 The proposed garden size for the new dwelling house is substantial at 43.7m². This is an area that measures 4.6m in length by 9.8m in width, and which has a southerly exposure free of any obstruction of sunlight or daylight. The extent of garden area for this non-family, one bedroom dwelling house is substantially more than one would expect of a similar sized unit in a flatted development and is more than is provided for many of the flats in the locality of the application site. The plentiful sunlight in the rear garden also spills into the main habitable area of the dwelling house through the wide bifold doors along the southern elevation.
- 6.3.3 The proposed dwelling is dual aspect with the living, dining and kitchen areas having a southerly aspect, and the bedroom (mainly used for sleeping) having a northerly aspect. The dual aspect of the dwelling house and its south-north orientation also benefits future occupiers by means of providing passive ventilation, and lower heating requirements. The privacy to future occupiers is secured by obscurely glazed secondary windows on the western elevation, and no windows being proposed on the easterly elevation. The garden area of the proposed dwelling comprises of a large area, with the easterly section being outside of 10m from the rear facing first floor openings to the west. The use of boundary treatment screening and landscaping will augment the separation distance to provide a sense of enclosure and privacy to the future occupiers when using their garden.
- 6.3.4 It is also noteworthy that despite the proposed dwelling house only being a one bed unit, the future occupiers do have the benefit of a private car parking space within the curtilage and with sufficient turning space off-street. This parking space will be furnished with an electric car charging point to the LPA required specification. In addition, the proposed plans also include sheltered and secure cycle storage within the rear garden of the dwelling house.
- 6.3.5 The plans show that the proposed development would comply with policies D DM1 and D DM2 of the Local Plan 2018.

6.4 *Impact on Neighbouring Properties*

- 6.4.1 By virtue of the low level height and scale of the proposed building, it sits substantially below a 25 degree line taken from the ground floor dwelling units. Consequently, there would be no adverse impact in terms of daylight or outlook on the flats in the host building, or those in neighbouring buildings, because of the proposed development. There is no building or garden area immediately to the north of the development that could be adversely impacted by a loss

of sunlight, overshadowing or an overbearing impact. There is no loss of privacy to neighbouring properties because the only windows in the west elevation are secondary and obscurely glazed in any case. The building of 15 Glenwood Avenue is too distant for there to be any adverse impacts from the proposed 2.7m high building.

- 6.4.2 The proposed development will result in there being another household positioned to the rear of the existing flats, however owing to the limited size of this dwelling house, and the extensive landscaping and boundary treatment to be put in place along the intervening boundary, there will be no significant adverse impacts on existing neighbouring properties. The additional car movements arising from a one bed dwelling house with one car parking space will not result in any substantial noise generation or disturbance, and in any case the private driveway and area to the rear of these properties is already used by vehicles.
- 6.4.3 The plans show that the proposed development would comply with policies D DM1 and D DM2 of the Local Plan 2018.

6.5 *Highways*

- 6.5.1 Neville Road is a 30mph residential street which has a tight geometry meaning that vehicle speeds are generally low. A review of crash map data shows that there has not been any traffic accidents in Neville Road from 1999 to the present day. The private driveway has existed for a substantial number of years and at least since no.22 was converted into flats over forty years ago. It has an existing access onto Neville Road, which is presently used by the neighbouring property's residents (no.24), who have a right of way across this land.
- 6.5.2 The proposed development will not result in the loss of any off-street parking capacity and provides a single parking space within its own residential curtilage. There is sufficient space for a vehicle to turn and park in this location to ensure that it both accesses and egresses the site in a forward gear. The existing visibility splays are satisfactory. One parking space is policy compliant in terms of the accessibility of the application site to public services and transport routes and having regard to the small non-family nature of the proposed dwelling house.
- 6.5.3 The application is compliant with policy T SP1 of the Local Plan 2018, as well as paragraph 109 of the NPPF which restricts against the refusal of applications unless it is demonstrated that the residual cumulative impacts on the road network would be *severe*.

6.6 *Natural Environment*

- 6.6.1 As evidenced by the aerial image provided under paragraph 6.2.3, the application site has very recently been cleared of the pre-existing vegetation, which comprised of an unkempt area of grassland and shrubs / brambles. This being the case, and in the absence of any loss of trees, there is very little in the way of ecology and habitats on the application site. However, what limited biodiversity there is on-site now, can be compensated and improved upon by enhancing the quality of the habitat space in the rear garden of the new dwelling, and by increasing planting through landscaping some of the land within the blue lined area.
- 6.6.2 Through the proposed landscaping scheme, and in the absence of any significant biodiversity or habitats on the site at present, the application is demonstrably fully compliant with policies ENV SP1, ENV DM1 and ENV DM5 of the Local Plan (2018). In accordance with the requirements of policy W DM3 of the Local Plan (2018), a SUDS report can be prepared and submitted for the approval of the Local Planning Authority by condition.

Report Prepared By:

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25 March 2021