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PLANNING SUPPORT STATEMENT

**In relation to a Planning Application for
*‘Demolition of 1 No. house and erection of 2
No. detached chalet style dwellings, with
garaging and car parking’***

**10 Felpham Gardens, Felpham, West Sussex,
PO22 8QS**

December 2018

PLANNING STATEMENT

10 Felpham Gardens, Felpham, West Sussex, PO22 8QS

I. INTRODUCTION

- 1.1 This planning application is submitted on behalf of Mr. Tom Barnes & Ms Lauren Reddie. The detailed submissions propose the erection of 2 No. detached chalet style dwellings, with associated garaging and car parking, following the demolition of an existing dwelling and garage (No. 10 Felpham Gardens).
- 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 Mr. Chris Moore, Sussex Building Consultancy Limited and the supporting Tree Report from Arbortrack Systems Ltd.



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2. SITE CONTEXT

- 2.1 The proposed development seeks to demolish No. 10 Felpham Gardens, an existing chalet bungalow, with a detached garage to the south east side. The existing property has been vacant since Summer 2016 but was very run down for many years prior to this. It is located towards the end of a residential cul-de-sac; Felpham Gardens.
- 2.2 The application site is broadly rectangular in shape, tapering out towards the rear. It measures 0.085 hectares (850m²) in size. It is positioned to the east side of Felpham Gardens, which itself is located south of Felpham Way.



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

- 2.3 The site is relatively well screened by dense vegetation, in the form of trees and hedging.
- 2.4 The application site is positioned adjacent to Felpham Gardens, adjoining residential properties and their gardens to the north and east sides. A recreation ground (King George V Field) adjoins the site to its south side.
- 2.5 The immediately surrounding area is typified by detached bungalows and chalet bungalows. A number of these properties have dormers to the side roof slopes. Properties generally comprise of white painted walls and tiled roofs.
- 2.6 Felpham Way to the north is mixed in character, comprising a mixture of commercial and residential uses. Properties vary in scale, size and form.
- 2.7 In terms of the application sites designation in relation to Local level policies, the site is located within the built up area boundary, as defined by the Local Plan Policy Map 3: Bognor Regis and the Local Area.
- 2.8 The recreation land to the immediate south side of the site is identified as being 'Local Green Space', within the Felpham Neighbourhood Plan.
- 2.9 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.
- 2.10 To our knowledge, no other planning constraints or designations are applicable to the application site.



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3. THE PROPOSAL

- 3.1 This proposal seeks planning permission for the erection of 2 No. detached chalet bungalows, with associated private amenity space and car parking, following the demolition of the existing dwelling and garage.

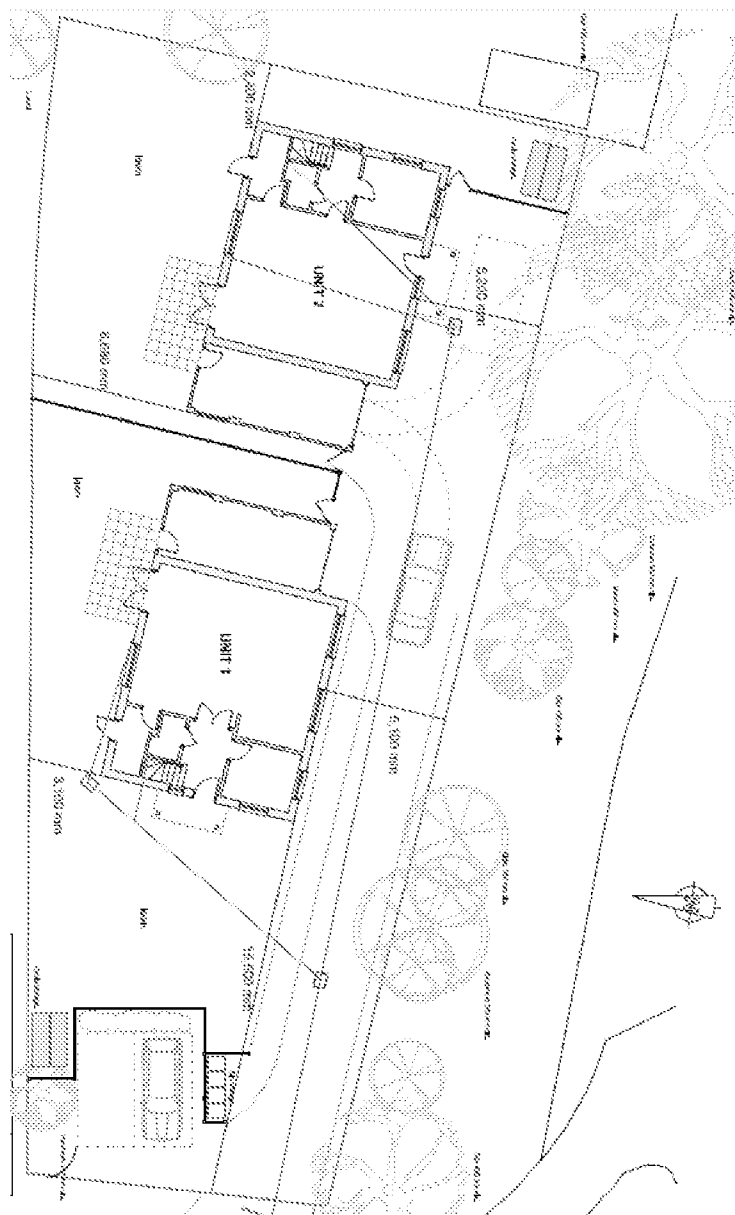


Fig 2. Extract from proposed site plan

- 3.2 As detailed at **Fig 2**, unit 1 would be set back from Felpham Gardens in a similar position to that existing; albeit brought marginally further forward on the site. Unit 2 would be positioned behind, towards the rear of the site. An access drive would run along the southern boundary, with residential gardens to the front and north side of the site. In addition, the properties would be positioned at an angle, serving to both minimise their prominence from Felpham Gardens and to increase the separation distance between them and the closest neighbouring property to the north side.
- 3.3 Both new dwellings would comprise an open plan living room, kitchen and dining area, with separate utility and study at ground floor level. There would be 3 No. bedrooms and a bathroom above. Each property would also have an attached single garage.
- 3.4 The Gross Internal Floor Areas are the same for both units, comprising 69m² at ground floor level and 68m² above. Each garage would measure 20m².
- 3.5 Unit 1 would have a private residential garden to the north and west sides, measuring 189m². Unit 2 would have a slightly smaller garden area to the north side, measuring 166m².
- 3.6 The application site would be accessed via the existing dropped kerb and access point off the east side of Felpham Gardens, and would run along the southern boundary of the site, leading to both garages and 1 No. parking space to the front of Unit 2. There would be an additional 2 No. parking spaces to the front of the site; resulting in a total of 5 No. parking spaces.
- 3.7 Secure, covered cycle parking provision is provided to the front of the site, as detailed on **Fig 2**.



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- 3.8 Bin and recycling storage is positioned to the front west side of the site, as detailed on the submitted plans.
- 3.9 Landscaping will be provided as part of the development.



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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 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.”*
- 4.11 Paragraph 108 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide: *“a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; b) safe and suitable*

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

- 4.12 At paragraph 109 the Framework also confirms that *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 4.13 Section 11 is entitled 'Making effective use of land'. Paragraph 117 confirms that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"*.
- 4.14 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."*
- 4.15 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."*
- 4.16 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."*



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- 4.17 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...”*
- 4.18 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.”*
- 4.19 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.”

- 4.20 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

- 4.21 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.
- 4.22 As identified on **Fig 3**, the Application Site is located within the defined built up area boundary, 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.

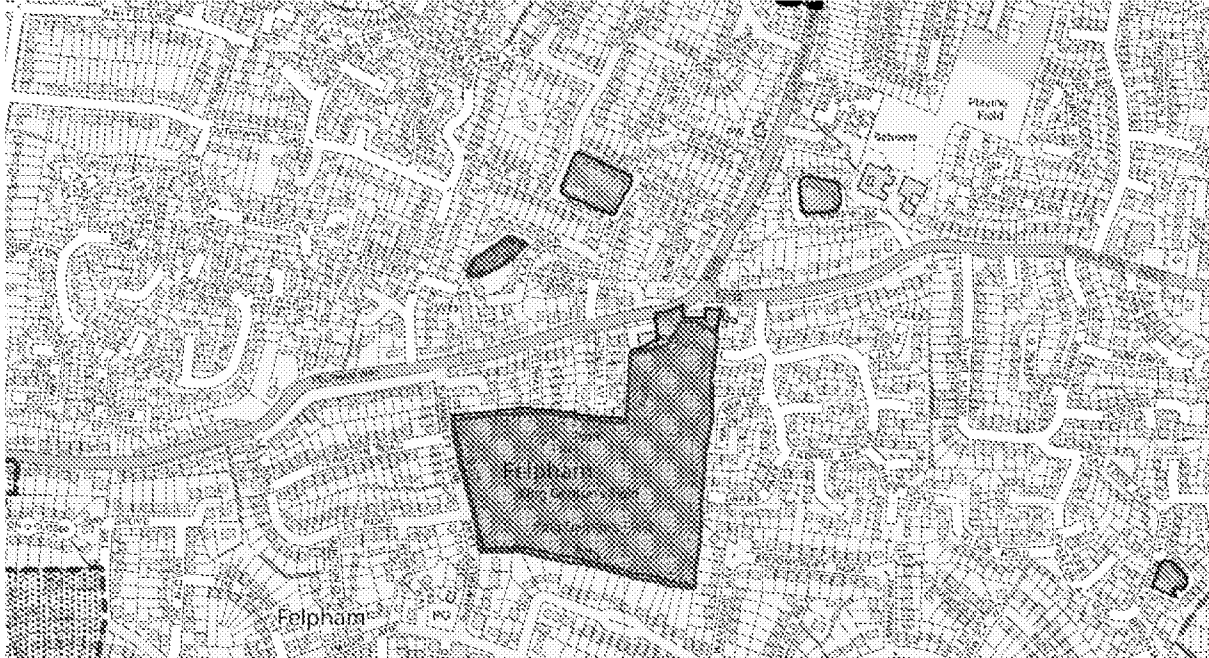


Fig 3. Extract from Arun Local Plan Policy Map 3: Bognor Regis & Surrounding Area

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

4.24 **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”*.

4.25 **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”*.

- 4.26 **Policy G1 SP1** is a general policy, which relates to Green Infrastructure and development.
- 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:*



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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.*



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9. *Public realm. Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.*

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

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

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

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

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

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

- 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 OSR DM1** relates to Open space and recreation. It notes that local green space and neighbourhood plan local green space is *“not identified in this Local Plan but will be designated in Neighbourhood Plans in circumstances where the criteria in paragraphs 99 and 100 of the National Planning Policy Framework (49) are met”*.
- 4.31 **Policy ENV DM4** is a detailed policy, referring to the protection of trees.
- 4.32 Finally, **Policy T SP1** is a more general policy that refers to matters relating to transport and development.

(iii) Felpham Neighbourhood Plan 2013 - 2029

- 4.33 The Felpham Neighbourhood Plan was formally made on 2nd July 2014. The following policies are considered to be of relevance to this proposal:-
- 4.34 **Policy ESD1** refers to design of new development. It states that *“Design of new development New development which would have an effect on the appearance or character of the surrounding area must be of a high quality of design and must contribute to local character by creating a sense of place appropriate to its location”*.
- 4.35 **Policy ESD4** relates to new dwellings – code for sustainable homes. It notes that *“all new dwellings will be designed to have a predicted water discharge of no more than 80 litres of water per person per day in line with Level 5 of the national Code for Sustainable Homes, unless it can be shown that achieving this standard would be impracticable”*.

- 4.36 **Policy ESD5** refers to Surface water management, stating that *“all development proposals other than minor household or commercial extensions (less than 10% increase in floor space) will be required to provide a surface water management plan detailing methods of dealing with surface water arising from development, and will be supported provided that the development would not compromise the emerging Surface Water Management Plan for the Lidsey Catchment or the Aldingbourne and Barnham Rife Strategy”*.
- 4.37 **Policy ESD8:** Building design, states that *“the design of new buildings must reflect the design principles of their time so that the richness of varied character would continue and would be extended into the future. However, the quality of design must ensure that new buildings contribute positively to the historic character of the area. Listed Buildings and their setting, and Conservation Areas and their settings, will be conserved or enhanced to reinforce the quality and character of Felpham”*.
- 4.38 **Policy ESD9:** Tree protection, states that *“development that damages or results in the loss of ancient trees or trees of arboricultural and amenity value will not be permitted. Development proposals must be designed to retain ancient trees or trees of good arboricultural and amenity value. Proposals should be accompanied by a tree survey that establishes the health and longevity of any affected trees and a management plan to demonstrate how they will be so maintained”*.
- 4.39 **Policy ESD10** refers to design details. Noting that the following items must be considered early in the design process and integrated into the overall scheme:
- bin stores and recycling facilities
 - cycle stores
 - meter boxes
 - lighting
 - flues and ventilation ducts
 - gutters and pipes

- satellite dishes and telephone lines.

4.40 **Policy ESD11:** Increasing the energy efficiency of our buildings, states that *“the Plan will support development which contributes to both mitigating and adapting to climate change and to meeting the national targets to reduce carbon emissions through incorporating measures which are strongly linked to the measures set out in the Code for Sustainable Homes (CfSH), with regard given to achieving Level 4 CfSH. All new housing development, with the exception of the conversion of historic buildings should have a minimum energy efficiency standard equivalent to Level 3 of the CfSH”.*

4.41 Finally, **Policy CLW6** refers to Local green spaces. This policy outlines that the Parish Council has designated the areas shown in Map D in the appendices as Local Green Space. Proposals for development of land designated as Local Green Space will not be permitted except in very special circumstances. The area to the south of the site is identified as a Local Green Space. This area of land is outlined in appendix D as following:-

“1. KING GEORGE V PLAYING FIELDS This large area is the largest public use pleasure, recreational and leisure land in the village of Felpham. It has formal football pitches and pavilion along with a half court basketball area and children’s playground. It has footpaths around the outer perimeters, which are extremely popular with walkers and dog walkers, and is the area used during the Fun Fair season, with an annual visit in July. It also has hosted charity events etc in the past. The area is also home to a variety and numerous number of trees and hedges. Owned and maintained by Arun District Council. Has a Management Plan. This is designated as Local Green Space because of its significant recreational value”.



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5. PLANNING HISTORY

a. Application Site

- 5.1 According to the Council's online planning records there is no planning history relating to No. 10 Felpham Gardens.

b. Adjoining Sites

- 5.2 We are aware that No. 8 Felpham Gardens was granted planning permission for 'change of use from C3 (dwelling) to C4 (house in multiple occupation)', by decision notice dated 31st August 2010, under planning ref: FP/107/10.
- 5.3 At the time of this application being considered, the case officer noted that *"the site lies within the built up area boundary where development is acceptable in principle, subject to normal development control criteria being satisfied with regard to visual and residential amenity. PPS3 (Housing) states that mixed communities should be encouraged, particularly in terms of tenure and price as well as a mix of different households such as families with children, single person households and older people".* The Officer went on to conclude that *"there is an acknowledged requirement for student accommodation in Bognor Regis and the application property is located in a good location to serve this requirement. There is not considered to be any significant amenity harm arising from the proposal and the car parking requirement for multiple occupancy would not be significantly greater than the existing use as a dwelling house. It is therefore recommended that the application be approved..."*



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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, where the principle of development is generally accepted, subject to other policies within the development plan.
- 6.2 Felpham Gardens is a residential cul-de-sac and as such, the proposed redevelopment of the site with 2 No. chalet bungalows would be wholly acceptable in this context.
- 6.3 In terms of housing supply, it is understood that the District Council's position, having now formally adopted the new Local Plan, which includes a housing strategy for the plan period, is 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 position.
- 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 Felpham Neighbourhood Plan area. The Neighbourhood Plan was made in July 2014, four 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 is 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 within easy walking distance of a number of services and facilities along Felpham Way. This includes a Tesco Express, 1 public house, restaurant, Methodist Church, Pet Shop, Petrol Station and a number of other retail units.

6.10 The following schools and other services are also within easy reach of the site:-

Schools

Bishop Tufnell CofE Primary School	610 yards
Downview Primary School	0.7 miles
The Regis School (Secondary)	2.2 miles

Doctors

Flansham Park Health Centre	0.5 miles
Downview Primary School	0.7 miles

Dentist

Newholme Dental Practice	690 yards
Felpham Dental	0.6 miles

Opticians

Bridle Opticians	0.5 miles.
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6.11 In addition, the site is well served by the following bus stops (detailed on Fig 4 below):-

1. The Southdowns (opp) on Felpham Way, Felpham;
2. Firs Avenue (opp) on Felpham Way, Felpham;
3. The Southdowns (o/s) on Felpham Way, Felpham;
4. Firs Avenue West (opp) on Firs Avenue, Felpham;
5. Firs Avenue (adj) on Felpham Way, Felpham;
6. Firs Avenue West (adj) on Firs Avenue, Felpham;
7. Roundle Road (opp) on Flansham Lane, Flansham;
8. Roundle Road (adj) on Flansham Lane, Flansham;
9. Pennyfields (opp) on Middleton Road, Flansham.



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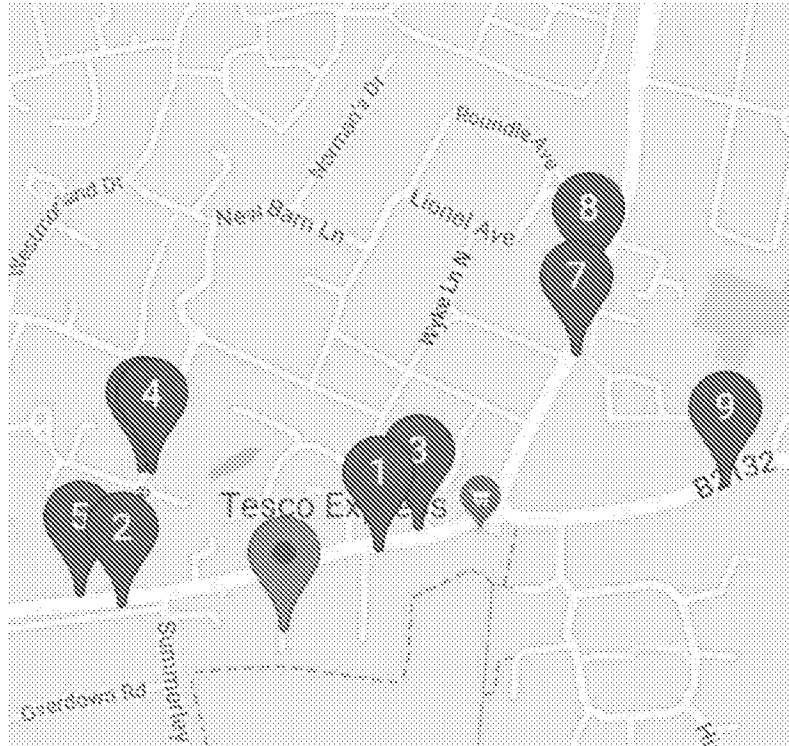


Fig 4. Map showing the location of nearby bus stops (*courtesy of nextbuse.mobi*)

- 6.12 A greater selection of facilities and services are also available in the nearby village of Felpham and Bognor Regis; with the closest hospital and railway station in Bognor Regis (1.6 miles).
- 6.13 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

- 6.14 The existing dwelling comprises a detached chalet bungalow and a single storey detached garage. This property and garage will be demolished in order to facilitate the proposed development. The existing house is in a very dilapidated condition, having been vacant for over 2 years, and allowed to degrade for a considerable period prior to this. Visually the building is an eyesore, and certainly its removal will

result in an enhancement to the local streetscene and views from the recreation ground to the south.

- 6.15 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'.
- 6.16 Properties along Felpham Gardens generally comprise detached bungalows and chalet bungalows, a number of which have dormers. As detailed above, No. 7 Felpham Gardens consists of an HMO.
- 6.17 Clovelly Avenue is a residential cul-de-sac located to the east. It is mixed, characterised by detached and semi-detached bungalows, chalet bungalows and two storey properties. Felpham Way is also mixed in character, consisting of both residential and commercial properties. Buildings vary in both their size and type.
- 6.18 It will be clear from a site visit that surrounding plots are varied in both their size and shape. Indeed No.8 is an anomaly due to not only its larger size, but its position adjacent to the recreation ground, and its shape with an increased plot width at the rear of the site. These factors combine to provide a plot that lends itself to a development of the type and scale now proposed.
- 6.19 **Table 1** and **Fig 5** identify a number of sites within the surrounding area. The table clearly shows that the application site is much larger than neighbouring sites and flares out towards the rear. It is our view that the site is comfortably large enough to accommodate 2 No. dwellings of the size and scale proposed, without impacting on the established spatial pattern of development in this area, or resulting in an unneighbourly development. The proposals would not jar or appear incongruous, and instead would entirely respect the urban grain in this part of Felpham.



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	Site Address	No. of Dwellings	Site Size (hectares)	Residential Density (dwellings per hectare)
A	10 Felpham Gardens (as existing)	1	0.085	11.76 dph
A	10 Felpham Gardens (as proposed)	2	0.085	23.52 dph
B	8 Felpham Gardens	1	0.057	17.54 dph
C	6-10 Old Manor House Gardens	3	0.119	25.21 dph
D	92-94 Felpham Way	2	0.078	25.64 dph
E	Land at south end of Clovelly Avenue	8	0.362	22.09 dph

Table 1: Table showing the site areas and residential densities of nearby sites



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Fig 5. Map identifying adjoining sites, as detailed in Table 1 above
(courtesy of Promap)

- 6.20 It will be noted that the application site is 0.085 hectares in size, representing an existing residential density of just 12 dwellings per hectare (dph), which is very low by modern standards and relative to the surrounding area. The proposed residential density is 24 dph, which suggests a more efficient use of the site.
- 6.21 By way of comparison, No. 8 Felpham Gardens (annotated as 'B' on the plan above) to the north has a residential density of 18 dph. Sites to the west (6-10 Old Manor House Gardens ['C'] & 92-94 Felpham Gardens ['D']) are 25 and 26 dph respectively.
- 6.22 It is noteworthy that the development to the immediate east ('E') includes a number of smaller plots, for example, the dwelling of 'Sea Pinks' which adjoins the north

side of King George's Field measures 422 sqm, whilst 'Casa Mia', which lies immediately to the northeast of the application site measures just 258 sqm. The two plots that are proposed by way of this planning application would each be in the region of 425 sqm in size.

- 6.23 It is our view that the proposed development of 2 No. houses on plots in the region of 425 sqm in size would be wholly appropriate for the area, appearing perfectly in keeping with plots sizes in the surrounding area. Given the context of the area, the application site is clearly large enough to comfortably accommodate 2 No. dwellings of the size proposed.
- 6.24 In addition, an aerial view of the site clearly demonstrates that properties run in both horizontal and vertical directions; with no set building lines or uniform patterns.
- 6.25 Although there has been only limited backland development within the immediately surrounding area (noting that the 3 houses at Old Manor House Gardens appear to be a backland cul-de-sac); the character is such that the addition of 2 No. dwellings at the application site would appear entirely in keeping with the established character and appearance of the area.
- 6.26 As detailed at **fig 6** and **7**, the proposed dwellings would comprise face brick external walls, with a barn hipped tiled roof. They would have 2 No. modest sized pitched roof dormers to the south roof slope, with a small flat roof dormer above the garage element. They would have an additional 3 No. flat roof dormers to the northern roof slope.



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Fig 6. Unit 1 – Proposed front (west) and side (south) elevations

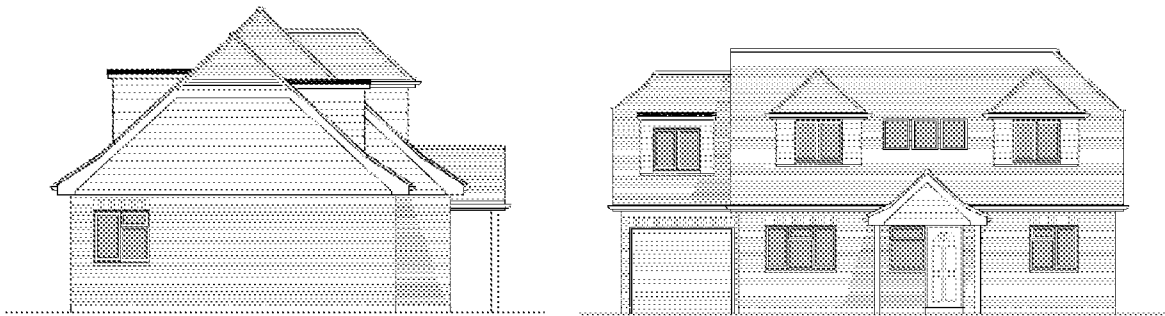


Fig 7. Unit 2 – Proposed front (west) and side (south) elevations

- 6.27 As detailed on the submitted street scene elevation (refer to **Fig 8**), unit 1 would have a reduced ridge height, when compared to the existing dwelling. This unit would be set marginally forward of the site, although would be set behind existing dense screening.

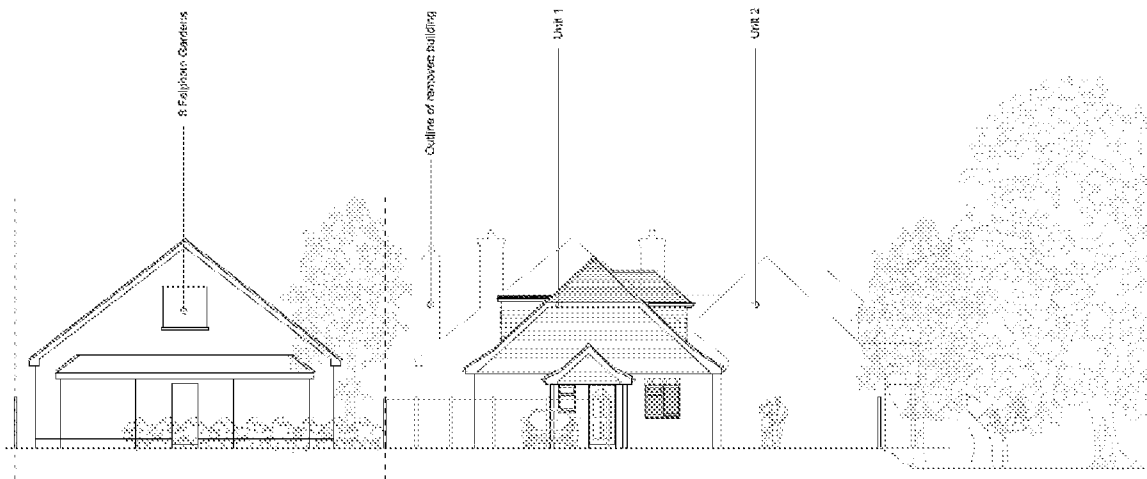


Fig 8. Extract from proposed street scene (Felpham Gardens)

- 6.28 It is our view that the proposed footprint of the buildings would compare favourably with surrounding built form. The new dwellings would sit comfortably on the site, with each property having a separate and appropriately sized area of private amenity space. In our opinion, the proposals will lead to a clear visual enhancement of the site, which would be to the benefit of the amenities of all who live close-by, or use the adjacent recreation ground.
- 6.29 It is our view that the proposal development would represent a high quality development, which would be of a sympathetic 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

- 6.30 The application site is positioned adjacent to Felpham Gardens, adjoining open space to the south and residential properties and their gardens to the rear and north side.

- 6.31 It will be clear that great care and consideration has been given to the design of the buildings, with particular attention being paid to its siting and layout. Notably, the properties have been orientated to look out over the adjoining open space.
- 6.32 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.
- 6.33 The closest neighbouring dwelling would be No. 8 Felpham Gardens to the north of the site. With regard to windows, each of the proposed dwellings has 3 No. first floor windows to the north elevation; however these all lead to non-habitable rooms (bathroom, en-suite and landing window) and could be obscure glazed if required.
- 6.34 The proposed development would utilize an existing access from Felpham Gardens, which would run along the southern boundary of the site, leading to turning and parking facilities for each property. This access is set well away from any neighbouring properties and would not cause demonstrable harm to the residential amenities of any this, or any other neighbouring property by way of noise or disturbance.
- 6.35 In addition, the proposed dwellings would be set well away from neighbouring dwellings, with residential gardens being positioned between the proposed dwellings and the shared northern boundary.
- 6.36 Further, there is dense tree screening along the southern boundary and our client would be happy to provide further landscaping if the Council considers this necessary.
- 6.37 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.

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

d. Access and Parking Arrangements

- 6.39 Access to the highway will be via an established access point onto Felpham Gardens.
- 6.40 The proposed layout arrangement has 5 no. car parking spaces provided, 2 No. for each dwelling and an additional visitor space. 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.
- 6.41 Given that the proposed access route is existing and onto an established, non-classified 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.
- 6.42 As such, it is our view that the proposal would be acceptable from a highway safety perspective.

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

e. Space Standards

- 6.44 Both of the residential units 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 house is 137m² (ground floor 69m²; first floor 68m²).
- 6.45 This document sets out that a three bedroom (two storey, 6 person, two storey) house should have a minimum gross internal floor area of 102m². As such, each of the houses would comfortably exceed these requirements.
- 6.46 The proposal would also include an area of private residential garden for each house (Unit 1 189m²; Unit 2 166m²).
- 6.47 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. Trees

- 6.48 The application is supported by a Tree Report, prepared by Arbortrack Systems Ltd.
- 6.49 This report confirms that none of the surveyed trees will be removed to allow or facilitate development. Some minor cutting back of overhanging branch tips of trees 11 and 13 is recommended to improve separation with the proposed dwelling. It notes that the dwellings will have a very similar relationship with off-site surveyed trees to that currently present at 7 Felpham Gardens.



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- 6.50 The report goes on to note that *“some soft ground within the root protection area (RPA) of trees 11 and 13 principally will be converted to hard standing (driveway) at the end of development. Levels will be made up using loose granular fill as per guidance in BS5837:2012 section 7.4.4.4. Finished surfaces will be constructed to a conventional specification with a porous surface to allow water infiltration to those areas of the RPA of tree 11 principally...The great majority of site works will take place beyond the RPA of retained trees and canopies. Retained trees will be protected through the course of development by fencing to the specifications recommended by BS5837:2012...”*
- 6.51 Our client is committed to carrying out a high quality development and will take all the above mitigation measures into consideration as part of the development proposal.

g. Other Matters

(i) Sustainable Development Summary

- 6.52 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

- 6.53 The application 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

- 6.54 The provision of 2 No. chalet bungalows (a net gain of 1 No. unit) will make a small, albeit notable contribution to maintaining 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 defined built-up area, within walking distance of a host of facilities and services along Felpham Way and close to the village of Felpham and town of Bognor Regis, it is considered that the location of the site is sustainable. Overall it is considered that the proposal would satisfy the social role of sustainable development.

Environmental Objective

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



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7 CONCLUSIONS

- 7.1 The proposal seeks planning permission for the erection of 2 No. three bedroom chalet bungalows and attached single garages. An existing residential property and garage would be demolished in order to facilitate the proposed development. The result is a net gain of 1 no. residential dwelling.
- 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 sustainable area, within easy reach of a host of services and facilities along Felpham Way, with Felpham Village and Bognor Regis Town Centre also being within easy reach of the site.
- 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 It is our view that the proposed development of 2 No. houses on plots in the region of 425 sqm in size would be wholly appropriate for the area, appearing perfectly in keeping with plots sizes in the surrounding area. Given the context of the area, the application site is clearly large enough to comfortably accommodate 2 No. dwellings of the size proposed.
- 7.6 It is our view that the proposal would represent a high quality development, that would appear in keeping with the existing street scene in terms of scale, siting, form and design.

- 7.7 Unit 1 would be located in a similar position to the existing dwelling, with unit 2 being set behind. Both dwellings would be set away from the northern boundary by residential gardens, allowing a good relationship between the proposal and neighbouring buildings.
- 7.8 It is our view that the proposal would represent an acceptable form of development and would not cause demonstrable harm to the residential amenities of any neighbouring property by way of overbearing effect, loss of privacy or loss of light. Nor would the proposed access and parking arrangement create any undue noise or disturbance.
- 7.9 Ample space for the parking and turning of vehicles would be provided on site. In addition, storage for cycle and refuse would be provided.
- 7.10 The application is accompanied by a Tree report, which notes that none of the surveyed trees will be removed to allow or facilitate development. The proposed mitigation measures will be taken on board as part of any development and our client would be happy for this to be conditioned accordingly.
- 7.11 The proposal will provide a high quality, sustainable development, which will set a positive benchmark for Felpham. 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.

December 2018