

The Landings, Ford Airfield

Phase RM4 (South)

Planning Statement

RM4_02.A

August 2024



Vistry Group

ARUN DISTRICT COUNCIL F1824RES

The Landings, Ford Airfield

Infrastructure Reserved Matters

RM1 (North) Reserved Matters

RM4 (South) Reserved Matters

Planning Statement

Visiry Homes Limited

August 2024

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Appendix I – Affordable Housing Plans

1.0 Introduction

- 1.1 This planning statement has been prepared by tor&co on behalf of the applicants Vistry Homes Limited and Countryside Abri Ford North LLP (hereafter referred to as 'the applicants') to support three standalone reserved matters applications pursuant to condition 1 of outline planning permission F/4/20/OUT at Land at Ford Airfield, Ford (hereafter referred to as 'the site').
- 1.2 Outline planning permission (ref. F/4/20/OUT) was originally granted on 14th July 2023 for the following development:

Outline planning application (with all matters reserved except for access) for the development of up to 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding. This application affects a Public Right of Way. This application is the subject of an Environmental Statement. This application may affect the setting of a Listed Building. This application falls within CIL Zone 1 - Zero Rated.

- 1.3 The outline permission was approved with all matters reserved except access and was supported by a s.106 legal agreement.
- 1.4 The description of development for each reserved matter phase is as follows:

Infrastructure RM (IRM)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for Infrastructure RM, for the provision of a primary spine road and associated secondary road junctions, pavement, footpaths, cycle infrastructure and bus stops; site wide drainage infrastructure, including foul pumping stations, foul sewer infrastructure, SUDS basins, SUDS swales, surface water infrastructure; acoustic fencing; public open space, including landscape details, play areas, footpaths & associated works.

RM1 (North)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for phase RM1 (North), for the erection of 340 no. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas, and associated works.

RM4 (South)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for phase RM4 (South), for the erection of 357 no. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas, and associated works.

- 1.5 The reserved matters applications are submitted alongside details in accordance with the following outline planning conditions specific to each phase:
- Condition 18 (Ecological Protection and Enhancement Plan)
 - Condition 20 (Layout, Scale, Appearance and Landscaping Details)
 - Condition 21 (Landscape Details)
 - Condition 25 (Noise Impacts)
 - Condition 26 (Decentralised and Renewable or Low-Carbon Energy)
- 1.6 This statement details the proposed developments, explains the site context, pre-application consultation, the applicable development plan framework, and assesses the proposals against applicable planning policies. This statement should be read alongside the submitted application forms and accompanying drawings.

Supporting Documents

- 1.7 The reserved matters applications are also accompanied by the following technical reports and information:
- Proposed Plans
 - Design and Access Statement / Code Compliance Statement
 - Landscape Details
 - Surface & Foul Drainage Strategy
 - Transport Strategy
 - Noise Impact Assessment
 - Ecological Protection and Enhancement Plan
 - Arboricultural Impact Assessment
 - Energy & Sustainability Strategy
 - Statement of Community Involvement
- 1.8 This above list of supporting documents has been previously agreed with the Arun District Council through pre-application engagement as part of a Planning Performance Agreement.

2.0 Site Context

Wider Site Description

- 2.1 The wider outline site, which totals 86.83ha in area, is located between the villages of Yapton, Ford and Climping. It is approximately 3km to the northwest of Littlehampton town centre and 4km southwest of Arundel town centre. The South Downs National Park boundary lies approximately 2km to the north of the site.
- 2.2 The outline site is approximately 0.7km south of Ford railway station and 0.4km west of the River Arun.
- 2.3 The outline site is bound by Ford Lane to the north; the former Ford Airfield runway, plus industrial and agricultural uses to the east; Yapton Road and Horsemere Green Lane to the south; and Rollaston Park and agricultural land to the west.
- 2.4 Much of the outline site is currently in agricultural use, however, a large proportion of the concrete runways of the former Ford Airfield remain within the southern part of the site. The southern and eastern runways, which adjoin the application site, are currently utilised for car boot sales, a farmers' market and market uses on Thursdays, Saturdays and Sundays. Additionally, there are a few vacant and disused buildings located across the site, with their demolition being secured via the outline permission.
- 2.5 The outline site is also adjoined by several industrial and employment uses, with Ford Industrial Estate located to the west, Rudfield Industrial Estate to the east and various employment uses located to the north of the site along Ford Lane. Additionally, a wastewater treatment works (operated by Southern Water), a waste transfer station (operated by Grundon) and a recycling facility (operated by Viridor) are also located east of the site all of which are accessed from Ford Road.
- 2.6 Along the eastern edge at the central part of the site, there is the 'Flying Fortress' (indoor children's play area) and the 'Arun Sports Arena' (indoor five-a-side football facility). The access to these facilities is from Ford Road.
- 2.7 The whole of the site lies within the Parish of Ford. It adjoins the Climping Parish boundary at Horsemere Green Lane and Yapton Road. It touches the Yapton Parish boundary at its western-most point, along the alignment of the former Portsmouth and Arundel Canal.
- 2.8 There are several Public Rights of Way (PROW) which pass through the site (Path Numbers 363, 363_1, 366, 200_3 and 175). These respectively provide footpath connections between Yapton and Ford, and between Rollaston Park and Ford Road (via Rudfield Industrial Estate).

Infrastructure RM (IRM) Site Description

- 2.9 The IRM parcel totals a site area of 16.9ha. The redline boundary for the IRM application is shown below in **Figure 1**.

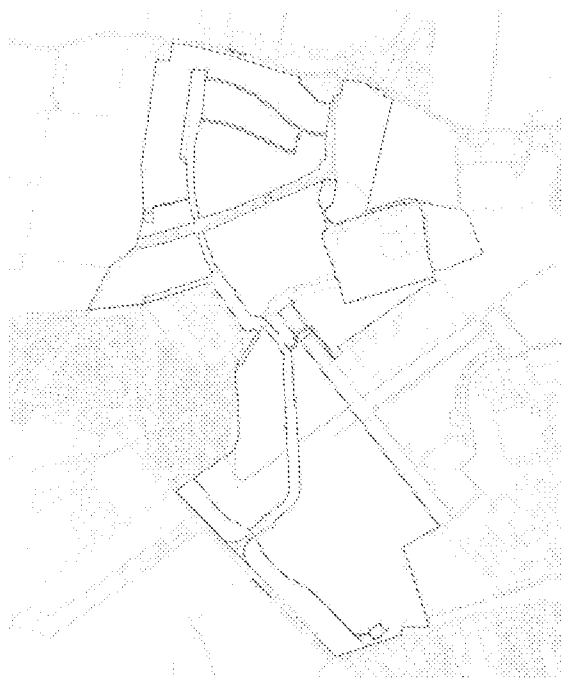


Figure 1 - IRM Site Location Plan

- 2.10 The IRM parcel comprises predominantly agricultural land but also includes a small portion of the existing Ford Airfield runway in the south of the site, and some areas of mature vegetation (predominantly category B and C trees) along Arun Way in the northern and northeastern parts of the site.

RM1 (North) Site Description

- 2.11 RM1 (North) totals 12.32ha in area and is located in the north-west corner of the site. The redline boundary for the RM1 application is shown below in **Figure 2**.

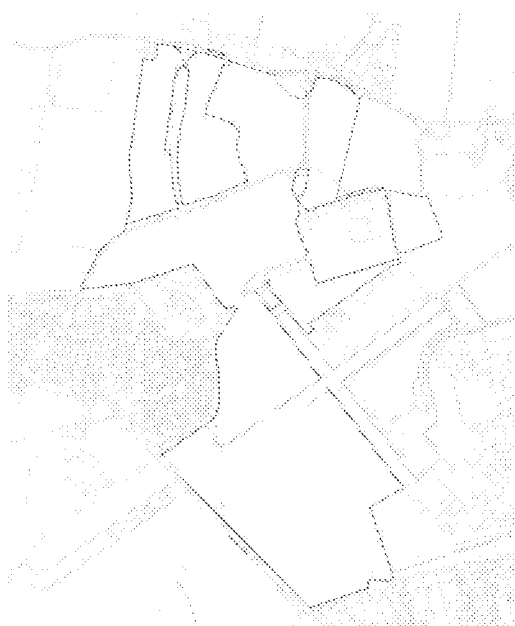


Figure 2 - RM1 Site Location Plan

- 2.12 The RM1 parcel currently comprises agricultural land and is partially bound to the north by Ford Lane and Peregrine House and Arun Way (PROW 363) to the south. The RM1 parcel is also intersected by the IRM redline where the northern most part of the primary spine road connects through to Ford Lane.
- 2.13 Beyond the primarily agricultural use of the land, parts of the former highway works depot and the surrounding category B tree group (G1006 & G1041) are located within the RM1 parcel.

RM4 (South) Site Description

- 2.14 RM4 (South) totals 19.5ha in area and is located in the south-east corner of the outline site. The redline boundary for the RM4 application is shown below in **Figure 3**.

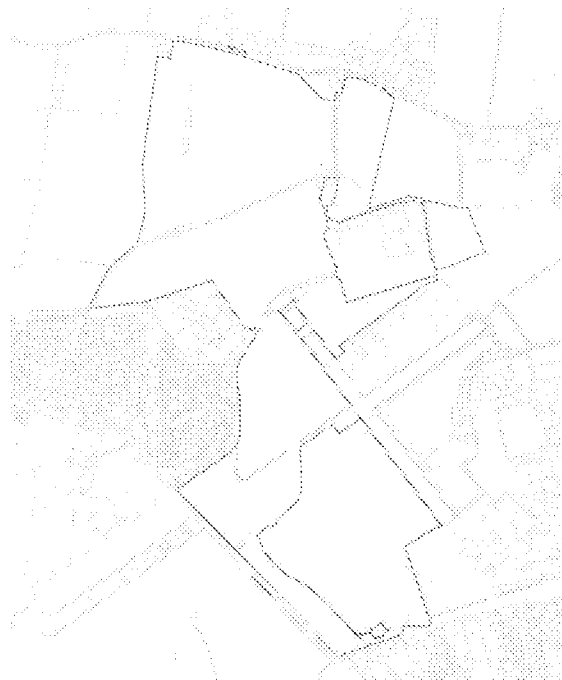


Figure 3 - RM4 Site Location Plan

- 2.15 The RM4 parcel currently comprises predominantly agricultural land but includes part of the former Ford Airfield runway in the northern corner of the parcel. The parcel is bounded by the south-east segment of the Ford Airfield runway, Horsemere Green Lane to the south-east, the future Ryebank Park and associated SUDS basins within Ryebank Park and by the primary spine road to the west. PROW 175 also crosses through the southern portion of the RM4 parcel.

- 3.3 Prior to the submission of any reserved matters application(s), Condition 7 required the submission and approval of a site-wide Design Code (excluding the employment land) which sets out and establishes how the site-wide development should come forward. The Design Guide provides further detail in relation to:
- How the development responds to local character
 - The character areas, street hierarchy, building typologies, key buildings, the approach to car parking and electric vehicle charging points, character of green infrastructure and structural planting, street trees, street furniture, external lighting and treatment of the public realm, public rights of way and pedestrian/cycle/equestrian connections.
 - The local centre
 - The approach to public art
 - The integration of drainage infrastructure into the public realm and green infrastructure
 - How the above-ground utilities infrastructure will be integrated into the street
 - Provision of interpretive material and a heritage themed walk along the route of the former western arm of the runway.
- 3.4 The Design Code has now been approved by Arun District Council (ref. F/10/24/DOC). And was prepared in consultation with the local community and Arun and West Sussex County Council officers and provided further details as how the site-wide development would come forward in accordance with Condition 4 (approved parameter plans), the outline Masterplan Document (July 2021), and the Arun Design Guide SPD.

4.0 Consultation

- 4.1 The reserved matters applications have been subject to a range of consultation as part of a Planning Performance Agreement prior to its formal submission to Arun District Council (ADC) as the local planning authority. This in addition to the earlier engagement that was undertaken to inform the outline planning application and its associated framework masterplan (ref: F/4/20/OUT).
- 4.2 Pre-submission engagement has also been undertaken with West Sussex County Council (WSCC) as highway and drainage authority, along with public engagement events with local residents. We summarise the pre-application engagement below.

Public Consultation

- 4.3 A public exhibition was held on 1st and 2nd May 2024, which provided residents and interested parties with an opportunity to view and comment on the initial proposals for The Landings. The exhibition was held at Edgcumbe Tea & Coffee Co on Ford Lane to the north of the site and further details are provided within the submitted Statement of Community Involvement (document references: RM1_10.A and RM4_10.A) prepared by SEC Newgate.
- 4.4 Following the public consultation, 49 pieces of feedback were received, including a mixture of physical feedback forms sent via the Freepost address, responses via the project website and project email.
- 4.5 Key feedback from attendees in relation to the IRM, RM1 and RM4 applications has been collated into the following key themes:
- Connectivity: there is a strong desire for increased cycle paths and footpaths that link to routes to the sea. Improved connectivity for cyclists and pedestrians is essential.
 - Natural environment and open spaces: 77% of respondents to the engagement survey supported retention of the existing hedgerows and planting around the edges of the site.
 - Community projects and art installations: there is support for initiating community projects that include the installation of art, sculptures, cycle/play trails, and landscape elements that reflect the area's history.
 - Types of housing: respondents also provided general comments on the types of housing that might be delivered on the site, with suggestions that there is a need for more cottages and affordable housing. Concerns were raised about the appearance of roof tiles and the preference for lower roof pitches to maintain a smaller scale. Detached garages were seen as a waste of space and should be integrated into homes.
 - Safety and maintenance of footpaths: creating and maintaining public footpaths to link with the existing network between villages is crucial. With the population set to increase, introducing a footpath or pavement to Ford Lane is particularly important to address current and future safety issues.

- Design: respondents indicated that they did not want the proposals to introduce new building materials, including vibrant terracotta to the southern neighbourhood, with 40% disliking this element and only 11% liking it.
- Character areas: 48% of respondents liked the proposal for the southern neighbourhood to have a semi-rural character, compared with 22% who disliked this approach. The element of the northern neighbourhood that the public responded particularly strongly to was the proposal to maintain a lower density around the edge to help transition into the countryside (48% liked).

Consultation with ADC

Design Code Pre-application Engagement

4.6 A series of pre-application meetings were held with ADC officers and WSCC officers in relation to both the Design Code and subsequently the separate reserved matters applications. The timeline of these meetings is set out below:

- 15th February 2024 - Design Code Workshop 1
- 21st March 2024 - Design Code Workshop 2
- 11th April 2024 - Design Code Workshop 3
- 3rd May 2024 - Design Code Workshop 4
- 19th July 2024 – RM Pre-application meeting

4.7 In addition, the draft Design Code was presented and discussed with members of the Ford, Yapton and Climping Advisory Group on the 30th April 2024.

Reserved Matters Pre-application Engagement

4.8 The project team met with ADC officers on 19th July 2024, following the submission of pre-application proposals for RM1, RM4 and the Infrastructure RM. The key feedback from this meeting was as follows:

RM1 (North):

- Dwelling Mix - Currently showing a higher proportion of 3, 4, and 5-bedroom units compared to the Councils Strategic Housing Market Assessment (SHMA), but noted typically larger house types towards edge of site and smaller units towards local centre. The phasing strategy should reference how site-wide unit mix in future phases will meet identified housing need.
- Ford Lane Character Area – Suggestion that a wider variety in the ridge heights is required to help the overall appearance and break up the roof line. The two indicative elevations shown for this area were both considered acceptable and would be in accordance with the proposed character area. Further details of materials and height will be required at RM stage.
- St Marys Meadow Character Area – Suggestions that greater variety in the ridge heights and roof forms should be explored to help the overall appearance and break up the roof line. Advice that some particular plots, and corner plots, should include side or bay windows to improve passive surveillance along pedestrian pathways.

- Arun Way and Landings Green Character Area – Design Code specifies use of white brick, white render and flint but these materials are not prominent in this area. Some suggestions to reduce ridge heights compared to dormers or that by adopting a pitched roof on the dormers could alleviate this.
- Apartments – Need to be bespoke and in keeping with the Design Code character areas parameters in which they are located.
- Density – Officers noted some deviations from the ADC Design Guide regarding set back distances and garden depths which needed to be further reviewed.
- On-street Parking – There were some long runs of visitor parking along key green infrastructure routes and streets, a lack of planting and the quantum of parking visible together should be reviewed to avoid car-dominated street scenes.
- Rear Parking Courts – proposals contained a few rear parking courts which did not have overlooking or appropriate pedestrian/vehicular routes, also lacked soft landscaping. Needs to be further reviewed.
- Garden Depths and Design – Irregular garden shapes should be avoided where possible. Irregular gardens should be measured against shortest distance from rear facing elevation to establish rear garden depths. Planting not to be shown in rear gardens or form part of and biodiversity enhancements given private spaces.
- Parking Quantum – Officers noted a lower quantum of parking against ADC Parking Standards, but due to the proximity of services and sustainable transport options, could be acceptable subject to justification for any non-compliance being provided.
- Play Provision – In future reserved matters applications, the locations of play areas (not equipment) should be shown on the overall layout to allow officers to confirm compliance with minimum buffer distances for each play area type. In addition, separate plans for the associated play areas should be submitted detailing indicative equipment, plus benches, fencing, bins etc. Detailed play area design can be secured via condition.
- M4(3) and M4(2) Accessible Dwellings – Disabled bays in communal apartment car parks required 1.2m on both sides (i.e. 4.8m wide) for building reg compliance. Disabled parking for private M4(3) plots needs to be 6 x 3.6m for all compliant plots. Appears several non-compliant spaces which need to be reviewed alongside review/confirmation of travel distances. M4(2) disabled spaces need to be able to be converted to 3.3m wide without removing spaces. If not able to be met, then units should not be labelled M4(2).
- Noise – Expectation that all dwellings will meet the internal and external noise standard without the need for significant noise mitigation interventions, as per best practice.

RM4 (South):

- Dwelling Mix – Currently showing a higher proportion of 3, 4, and 5-bedroom units compared to the Councils Strategic Housing Market Assessment (SHMA), but noting RMs located on peripheral edges of site where lower density housing

is supported within the Design Code. Phasing strategy will need to reference how site-wide unit mix will meet housing need as part of future phases.

- Layout – RM4 less dense than RM1, and generally complements the semi-rural character of the surroundings. Some parking appeared to be remote from some plots which needed further review. Corner plots should be ideally dual fronted or have some form of active frontage on both facades, particularly for natural surveillance of POS areas. All dwellings should have direct access to the rear garden for bikes and bins.
- Height – Provision of 1 storey bungalows in RM4 is supported as accords with the Councils Accommodation for Older People and People with Disabilities Statement. Provision of some 2.5 storey and 3 storey apartment blocks along the primary road acting as key turning point in the scheme is supported subject to appropriate design.
- Parking – Currently showing 793 car parking spaces (including visitor spaces, and accounting for garage spaces counted as half a space). Lower provision of parking could be acceptable given sustainable location/access to goods/services subject to appropriate justification.
- House Types – Further design details required for each housing type variety proposed to ensure accordance with Design Code.
- Ryebank Park Character Area – Street scene provides clear and well-established design response. Dark window detailing supported, but possibly not supportive of wider bulkier surround of flint given more contemporary approach.
- Runway Park Character Area – Suggestion that additional details required in relation to how the housing types will integrate with the proposed Runway alignment. Further consideration should be given to how the surfacing, lighting or landscape provide a continuous linear park which promotes the understanding of the Runway as a non-designated heritage asset.
- Rear Garden Depths – Whilst most dwellings were acceptable, there are instances where there are deviations from the ADC Design Guide which would not be supported unless justified. Gardens should always aim to be regularly shaped to maximise amenity space and avoid maintenance issues where possible.
- M4(3) and M4(2) Compliance – Parking spaces should be carefully reviewed to ensure that widths are suitable.
- Movement – Proposed Neighbourhood Green lacks suitable pedestrian links around it and through it which results in a potentially underused and neglected space. Neighbourhood Green and the east-west green link should be an important feature of the southern part of the site. A suitable 3m wide pedestrian/cycle route around the entire development and through the site should be considered. The 3m path proposed from Yapton to the proposed Yapton Lane Roundabout should be continued south to connect to Horsemere Green Lane. All other footpaths and connections should be a minimum of 2m.
- POS and Play – The location of the central LEAP within Runway Park provides adequate natural surveillance from surrounding houses. However, the LEAP may require additional play equipment. LEAP should ensure that it is age appropriate, challenging to users and creates a bespoke space. No details have been submitted relating to bins and dog waste bins and need to be provided.

These should be included within plans and should be shown across the development (i.e. not solely within the play spaces). Hoggins is used throughout the scheme, and this is acceptable for small, short additional sections of path. However, Hoggins is not suitable for all users due to rutting and therefore key routes through POS should comprise a tarmac finish or similar. Should be some cycle parking shown near to the central Runway Park LEAP also.

Infrastructure RM:

- Drainage Basins - Would prefer a more natural design for the 'roundabout basin'.
- Landings Green - The LEAP/LAP areas within the Landings Green Drainage basin should provide clearer design strategy and be reflected within the Design Code. The play area also needs to consider adjacent root protection areas. The play area would need adequate separation from future layout proposals and may need to be increased if LAP proposed at current size. Further details are required on street furniture (bins and benches) and tarmac is needed for primary routes throughout the site.
- Runway Park - Large buffers between the activity zone and dwellings are required.
- Ryebank Park - The locations of LAPs are not accessible during all weather conditions. There is a potential risk for children safety due to being located next to SuDS basins – LAPs locations should be amended. A 3.0m wide cycle/pedestrian path around the entire southern section of the development would be supported.
- Street Trees - WSCC highways resist trees wider than 8-12 cm at the time of planting. ADC would like to understand phasing detail in terms of planting and maturity rates of the trees to ensure high-quality street scene will be delivered.
- PROW - A PROW diversion order will need to be made for PROW 363 and 175. The bridleway along Arun way is supportable (however the surface needs to suit horses and riders). Advice from WSCC PROW should be sought. This is also the case for PROW 366.
- Ecological Measures - Arun Way and the edges of St Marys Meadow don't have the details on log piles and Hibernacula (which should be positioned into areas of boundary vegetation to avoid children using them). Missing measures: insect hotels, bat/bird boxes and hedgehog homes. Additional details related to tree removals and biodiversity enhancements need to be provided at RM submission.
- Ancillary Infrastructure - Foul Water Pumping Station 2 is in an existing tree line having a negative impact on tree roots. A diversion will need to be created for an existing PROW (advice needed from WSCC PROW). No details on elevation or enclosure of the substation (materials should reflect the surrounding development) and submitted with the RM applications.

Consultation with WSCC

4.9 The timeline of these meetings is set out below.

- 17th March 2024 - Pre-application Advice

- 9th July 2024 – Pre-application Advice

4.10 A summary of the feedback from these meetings is provided below.

Pre-application Advice (17 March 2024)

4.11 The project team met with WSCC highways and drainage officers on 17th March 2024. The key feedback from this meeting was as follows:

- Segregated route as opposed to shared use pedestrian/cycle infrastructure along spine road would be preference, but note shared provision is acceptable as per ADC Design Guidance SPD.
- Applications should incorporate Copenhagen style crossings along cycle routes.
- Visibility splays will need to be considered at all crossings.
- Link to potential future secondary school may need to consider how to accommodate additional cyclists and pedestrians.
- No WSCC standards on junction angles, rely on Manual for Streets Guidance.
- WSCC likely to support reduced parking standards where dwellings are located in close proximity to public transport infrastructure.
- Stage 1 road safety audit will be required for spine road.
- WSCC will not accept allocated parking on-street. Can only be for visitor parking or unallocated.
- Plans should show what drainage basins serve specific parts of the site.

Pre-application Advice (09 July 2024)

4.12 The project team had a follow up meeting with WSCC highways and drainage officers on 9th July 2024. The key feedback from this meeting was as follows:

- Project team should ensure junctions have crossing opportunities and consider introducing more dropped kerbs and crossings along the spine road.
- Applications should provide an overlay plan showing the wider cycle routes and pedestrian connections to ensure proper connectivity is achieved.
- Need to discourage parking on the verges of the spine road, preferably with non-intrusive measures rather than physical barriers such as bollards.
- No drop-off layby along the primary spine road would be supported for the primary school to ensure sustainable travel habits.
- Stem widths of street trees and their impact on visibility splays need to be considered. WSCC adoptions will only accept 8-12cm stem girth.
- Visitor parking allocation should be prioritised in areas with higher need (denser parts of the site) and avoid clustering in areas with sufficient parking already provided.
- Some areas identified as potentially large enough for parking within private curtilage (i.e. with excess area provided behind allocated parking spaces)

should be reviewed to ensure ‘overhanging’ parking doesn’t impact pedestrian safety or lead to illegal parking behaviour.

- Reduction of parking standards for flats are considered acceptable given sustainable location of site, and particularly where they are within walking distance to the spine road and have sustainable transport options, such as cycle parking, and accessible routes to Ford Station.
- Adding an additional pedestrian connection loop at the bottom of one of the southern basins, near Yapton Road, to improve pedestrian access and create a continuous path along the frontage of the development would be strongly supported.

Conclusions

- 4.13 The extensive pre-application consultation process undertaken both during Design Code development and through reserved matters pre-application engagement has helped inform the detailed design and mitigation strategies set out within each of the proposed reserved matters applications.

5.0 The Proposals

Descriptions of Development

- 5.1 The full description of development for each reserved matter phase is as follows:

Infrastructure RM (IRM)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for Infrastructure RM, for the provision of a primary spine road and associated secondary road junctions, pavement, footpaths, cycle infrastructure and bus stops; site wide drainage infrastructure, including foul pumping stations, foul sewer infrastructure, SUDS basins, SUDS swales, surface water infrastructure; acoustic fencing; public open space, including landscape details, play areas, footpaths & associated works.

RM1 (North)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for phase RM1 (North), for the erection of 340 no. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas, and associated works.

RM4 (South)

Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent F/4/20/OUT for phase RM4 (South), for the erection of 357 no. residential dwellings plus associated roads, infrastructure, parking, landscaping, open space & play areas, and associated works.

- 5.2 These reserved matters applications are made pursuant to condition 1 (reserved matters details) and in accordance with outline condition 4 (approved parameter plans) and outline condition 7 (Design Code).
- 5.3 The outline permission requires the submission of reserved matters applications for each development phase in accordance with a Phasing Strategy submitted prior to or concurrently with the first Reserved Matters application (Cond. 5 - Phasing). The site-wide phasing strategy will be submitted alongside these respective reserved matters applications as a standalone discharge of condition application.

Quantum of Development & Affordable Housing

- 5.4 The proposed developments will deliver 340 x homes within the RM1 phase, and 357 x homes within the RM4 phase. Cumulatively, both applications will deliver a total of 697 x homes out of the outline allowance for up to 1,500 homes.
- 5.5 Alongside the proposed 487 x market homes, both applications will also deliver 30% affordable housing, cumulatively totalling 210 x new affordable homes comprising intermediate First Homes, intermediate shared ownership and affordable rent homes. **Table 1** below outlines the proposed combined unit mix, whereas **Table 2** and **Table 3** detail the market/ affordable tenure split across each RM1 and RM4 phases respectively.

Table 1: Proposed Accommodation Schedule (RM1 and RM4 Combined)

	RM1	RM4	Total	
Dwelling type	Number of Units			%
1 Bed apartment	38	15	53	7.6%
2 Bed apartment	34	18	160	23.0%
2 Bed house	44	64		
3 Bed house	147	170	320	45.5%
4 Bed house	72	83	156	22.2%
5 Bed house	5	7	12	1.7%
Total	340	357	696	

Table 2: RM1: Proposed Market and Affordable Housing Mix

	Market	Affordable	Total	
Dwelling type	Number of Units			%
1 Bed apartment		38	38	11.2%
2 Bed apartment		34	78	22.9%
2 Bed house	44			
3 Bed house	125	22	147	43.2%
4 Bed house	64	8	72	21.2%
5 Bed house	5		5	1.5%
Total	238	102 (30.0%)	340	

Table 3: RM4: Proposed Market and Affordable Housing Mix

	Market	Affordable	Total	
Dwelling type	Number of Units			%
1 Bed apartment	3	12	15	4.2%
2 Bed apartment	6	12	82	23.0%
2 Bed house	26	38		
3 Bed house	132	38	170	47.6%
4 Bed house	75	8	83	23.2%
5 Bed house	7		7	2.0%
Total	249	108 (30.3%)	357	

Layout, Scale and Appearance

- 5.6 Both RM1 and RM4 layouts are proposed in accordance with the outline parameter plans in terms of location of development, location of public open space and SuDS infrastructure, access, densities (i.e. 20-50dph) and building heights (2-3 storeys).
- 5.7 The appearance and design of each phase follows the principles and coding set out within the approved Design Code, in particular consistency with character areas and building typology coding. The RM1 phase takes a more traditional approach to character and materiality given the adjacency of semi-rural fields along boundaries, whereas RM4 takes a more contemporary design approach reflective of its more historic and current industrial setting associated with the Ford Airfield and neighbouring uses.
- 5.8 Housing types include detached, semi-detached, terraced, bungalow and blocks of flats in key marker locations. A range of building heights, roof forms, ridge heights, setbacks, building lines and boundary treatments are utilised throughout to ensure variation across the site and to add interest within the townscape.

Landscape & Public Open Space

- 5.9 The Design Code followed a landscape led approach and advocates for high quality green infrastructure to be incorporated across the site. The landscape vision for each phase proposes a nature led approach, delivering high quality green spaces across the site that will deliver biodiversity net gains.
- 5.10 The three reserved matter phases will provide a variety of public open spaces, which include Landings Green, St. Mary's Meadow, Arun Way, Runway Park, and Ryebank Park. Each of these green spaces will deliver biodiverse rich planting schemes, with significant new hedgerow and tree planting, alongside new formal and informal play areas, recreational trails, and habitat corridors.

Transport

- 5.11 Running N-S through the centre of the site is the proposed primary spine road. This is designed as a 6.5m single carriageway, with a 2.0m footpath along the western side and a 3.5m shared pedestrian/cycleway along the eastern edge. Within the northern parts of the site, the primary spine road also includes planted verges with street trees, whereas the southern portions primarily includes landscaped swales on each side.
- 5.12 All road junctions have been designed to Manual for Streets and LTN/120 standards and are included along the primary spine road alongside strategic traffic calming measures to restrict vehicular travelling speeds along the primary spine road.
- 5.13 To promote sustainable travel behaviours and to reduce levels of car-dependence a series of tarmac and hoggin type pedestrian and cycle paths are proposed (plus upgrading PROW 363 to a bridle way) to maximise site-wide connectivity and to promote sustainable connections beyond the site, including to link with the proposed upgraded pedestrian/cycle path along Ford Road up to Ford Station.
- 5.14 Policy compliant levels of vehicle and cycle parking are proposed across both RM1 and RM4 phases – noting that given the sites sustainable location, provision and access to public transport infrastructure, implementation of a sustainable travel plan, and based

on a range of off-site infrastructure improvements and contributions being delivered, there exists sufficient justification for a 10% reduction for on-site vehicular parking.

Sustainability and Energy

- 5.15 Site-wide, a low-carbon renewable energy strategy is proposed, comprising new homes that will meet Future Homes Standards that incorporate a fabric first approach towards reducing energy and water demand. Electric air source heat pumps are proposed for each dwelling alongside solar PV provision.

Surface Water Drainage

- 5.16 A series of SuDS attenuation basins are proposed along both the southern boundary and northeast corner of the site that will provide storage capacity for the entire wider development. In addition, a series of infiltration swales are proposed within the IRM and RM4 applications which also form an important part of the landscape and biodiversity strategy for the site.

Biodiversity

- 5.17 A series of biodiversity and green infrastructure enhancements are proposed site-wide, including a biodiverse and native landscape planting strategy, integrated bee/bird/bat boxes on houses, standalone bird/bat boxes, and insect and hedgehog nesting boxes.

6.0 Planning Policy

- 6.1 This section of the statement provides a summary of the relevant national and local planning policy context including Arun District Council's adopted development plan, as well as other material considerations including supplementary planning documents and guidance.

National Policy & Guidance

National Planning Policy Framework (NPPF)

- 6.2 On 30th July 2024, the government published a draft NPPF for consultation, which runs until 24th September 2024. Until adopted, the draft NPPF will have no weight for decision making purposes. Notwithstanding, we note the government's new proposed revised method suggests ADC's annual housing need may increase from 1,342 homes/annum up to 1,409 homes/annum – a potential net increase of 67 homes/annum.
- 6.3 The currently adopted NPPF was published in December 2023. This document sets out the government's national planning policies for England and how these should be applied. The following paragraphs are considered to be the most relevant to this application.
- 6.4 Paragraph 39 encourages early engagement to *"improve the efficiency and effectiveness of the planning application system for all parties."*
- 6.5 Paragraph 60 confirms the government's objective of *"significantly boosting the supply of homes"* and providing *"a sufficient amount and variety of land"* to meet specific housing requirements of different groups.
- 6.6 Paragraph 96 promotes development that achieves *"healthy, inclusive and safe places...that enables and supports healthy lifestyles with the provision of safe and accessible green infrastructure and sports facilities."*
- 6.7 Paragraph 108 confirms that 'transport considerations are integral to the design of schemes and contribute to making high quality places'. Paragraph 112 goes on to state that *"application for development should:*
- Give priority first to pedestrian and cycle movements;
 - Address the needs of people with disabilities and reduced mobility in relation to modes of transport;
 - Create places that are safe, secure and attractive;
 - Allow for the efficient delivery of goods, and access by service and emergency vehicles;
 - Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations."
- 6.8 Paragraph 128 stresses the importance of making efficient use of land, advising *"it is especially important that planning policies and decisions avoid homes being built at low*

densities, and ensure that developments make optimal use of the potential of each site.”

- 6.9 Paragraph 131 reaffirms the importance of good design. It 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, creates better places in which to live and work and helps make development acceptable to communities.”*

Planning Practice Guidance (PPG)

- 6.10 In March 2014 the Department for Communities and Local Government (DCLG)¹ launched the Planning Practice Guidance (PPG) web-based resource. The PPG provides guidance on a range of planning topics and procedural issues. Those of particular relevance to this application include:

- Climate change
- Design: process and tools
- Flood risk and coastal change
- Healthy and safe communities
- Housing needs of different groups
- Housing supply and delivery
- Noise
- Renewable and low carbon energy
- Travel plans, transport assessments and statements
- Use of planning conditions.

National Design Guide

- 6.11 The government published the National Design Guide (NDG) on 1st October 2019. The purpose of the document is to promote good design in all new development. The NDG provides guidance on the issues that should be considered either when preparing planning applications for development or when assessing the quality of submitted schemes. The NDG is intended to *“illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice.”*

Local Policy & Guidance

- 6.12 In accordance with the provisions of Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning Compulsory Purchase Act 2004, an application must be considered against the provision of the adopted development plan, unless material considerations indicate otherwise.

¹ Now renamed the Ministry of Housing, Communities and Local Government (MHCLG).

ADC Development Plan

6.13 The adopted development plan for Arun District Council currently comprises:

- The Arun Local Plan 2011-2031
- West Sussex Joint Minerals Local Plan (2018)
- West Sussex Waste Local Plan 2014
- Made Neighbourhood Plans (incl. Ford Neighbourhood Development Plan 2017-2031)
- South Marine Plans (2018)

Arun Local Plan 2011-2031

6.14 The Arun Local Plan (ALP) was adopted in July 2018. Relevant policies from the plan for this application include:

- Policy AH SP2 (Affordable Housing)
- Policy D DM1 (Aspects of Form and Design Quality)
- Policy ECC SP1 (Adapting to Climate Change)
- Policy ECC SP2 (Energy and Climate Change Mitigation)
- Policy ENV DM4 (Protection of Trees)
- Policy ENV DM5 (Development and Biodiversity)
- Policy ENV SP1 (Natural Environment)
- Policy H DM1 (Housing Mix)
- Policy H SP2 (Strategic Site Allocations)
- Policy H SP2c (Inland Arun – SD8 Ford)
- Policy HWB SP1 (Health and Wellbeing)
- Policy INF SP1 (Infrastructure Provision and Implementation)
- Policy LAN DM1 (Protection of Landscape Character)
- Policy OSR SP1 (Allotments)
- Policy QE DM1 (Noise Pollution)
- Policy QE DM2 (Light Pollution)
- Policy QE SP1 (Quality of the Environment)
- Policy SD SP1 (Sustainable Development)
- Policy SD SP1a (Strategic Approach)
- Policy T DM1 (Sustainable Travel and Public Rights of Way)
- Policy T DM2 (Public Parking)
- Policy T SP1 (Transport and Development)
- Policy W DM2 (Flood Risk)

- Policy W DM3 (Sustainable Urban Drainage Systems)
- Policy WM DM1 (Waste Management)
- Policy W SP1 (Water)

West Sussex Waste Local Plan 2014

- Policy W2 (Safeguarding Waste Management Sites)
- Policy W10 (Strategic Waste Allocations)
- Policy W23 (Waste Management within Department)

Ford Neighbourhood Development Plan 2017-2031

6.15 The Ford Neighbourhood Development Plan 2017-2031 was made on 9th January 2019. Relevant policies from the plan for this application include:

- Policy SA1 (Ford Airfield)
- Policy EH1 (Protection of trees and hedgerows)
- Policy EH3 (Buildings and structures of character)
- Policy EH4 (Surface water management)
- Policy EH8 (Lighting)
- Policy GA1 (Footpath and cycle path network)
- Policy GA2 (Parking and New Development)
- Policy GA3 (Streets and Access Ways to serve new development)
- Policy H2 (Housing Mix)
- Policy H4 (Recreational Space)
- Policy H6 (Integration of New Housing)

Supplementary Planning Documents (SPD)

6.16 The following SPDs are also considered relevant to this application:

- Arun Design Guide (2024)
- Open Space, Playing Pitches & Indoor & Built Sports Facilities (2020)
- Arun Parking Standards (2020)

Other Material Considerations

The Landings Design Code

6.17 Condition 7 of the outline planning permission required the submission of a site-wide Design Code for approval by ADC, prior to the submission of any reserved matters application at the site.

- 6.18 The Design Code was prepared by tor&co in collaboration with officers at ADC. A final version of the Design Code was approved (ref. F/10/24/DOC) and this document forms a material consideration for all future reserved matters application at the site (except the employment zone which will be subject to its own design code).
- 6.19 The Design Code provides a set of rules to guide the detailed design of the Landings development and ensure good quality design and continuity between the development parcels as they come forward. The Design Code includes a combination of mandatory and recommended rules.
- 6.20 The submitted Design and Access Statements, and their supporting Code Compliance Statements, explain how the RM1 and RM4 parcels have been designed in accordance with the approved Design Code.

ADC - Accommodation for Older People and People with Disabilities Guidance

- 6.21 The Accommodation for Older People with Disabilities guidance document (post consultation version) was approved to be a material consideration at ADC's Full Council meeting on 13th November 2019. The guidance document provides the starting point for negotiations to help raise the standards and delivery of these important types of accommodation.

Emerging Local Plan

- 6.22 The adopted Arun Local Plan 2018 is now more than 5 years old, therefore ADC are updating their Local Plan to ensure that future development needs are met, and to incorporate with various legislative changes since the current Local Plan was adopted.
- 6.23 At the 6th March 2024 special meeting of the Planning Policy Committee, members approved the Direction of Travel Document as the council's method to undertake an Issues & Options consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 6.24 No present timescales for Regulation 19 publication are provided on ADC's website or within the Council's latest published Local Development Scheme (2023-2025).

Emerging Neighbourhood Plan

- 6.25 Ford Parish Council have published a Regulation 14 draft of the Ford Parish Council Neighbourhood Development Plan (2024-2041). Page 8 of the Plan sets out those policies which have changed and those that are being saved. As the Neighbourhood Plan has yet to be submitted or passed through examination it's draft policies are to be provided no weight in decision making.

Housing Land Supply

- 6.26 According to the latest Authority Monitoring Report (1st April 2022- 31st March 2023), ADC currently has a land supply of 4.17 years.
- 6.27 Furthermore, we note based on the Government's latest Housing Delivery Test results, based on 2019/20-2022/23, ADC only delivered 1,874 homes against a delivery target of 3,081 homes (64% of target). On this basis the Council are not meeting their

Housing Delivery Test requirements, and the presumption of sustainable development is therefore to be applied against out-of date policies.

- 6.28 We also note the Government's new proposed revised method suggests ADC's annual housing need may increase from 1,342 homes/annum up to 1,409 homes/annum – a potential net increase of 67 homes/annum, which is expected to be reflected in ADC's next Authority Monitoring Report up to March 2024.

7.0 Planning Assessment

- 7.1 The following section identifies and addresses the planning considerations pertaining to the determination of the three reserved matters applications. Where appropriate, reference is made to the supporting documents throughout.

Principle of Development

- 7.2 The principle of development of the site for residential development has been established through the outline permission (F/4/20/OUT) which was approved by ADC on 14th July 2023. The approved outline secured various conditions and S106 obligations/contributions to ensure the future development would be delivered in accordance with national policy and ADC's development plan.
- 7.3 In planning policy terms, the principle of mixed-use development was also established under ADC Local Plan Policy H SP2c (SD8 – Ford), and Ford Neighbourhood Plan Policy SA1 (Ford Airfield). As the site is allocated for development through Arun's Local and the Ford Neighbourhood Development Plan, the proposals are considered automatically to be sustainable development in accordance with paragraph 11c of the NPPF.
- 7.4 These reserved matters applications are made pursuant to condition 1 of the outline planning permission, which requires the submission of reserved matters applications for layout, scale, appearance and landscaping details for each phase of development.

Housing Delivery & Affordable Housing Statement

Policy Summary

- 7.5 NPPF Paragraph 129 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of each potential site.
- 7.6 ADC Local Plan Policy H DM1 (Housing Mix) states the Council will seek a mix of dwelling types and sizes, to include affordable housing units. For developments of 11 units or more the Council shall require a balanced mix of market and affordable dwelling sizes including family sized accommodation based on the most up to date SHMA recommendations. The tenure mix for development schemes shall be negotiated on a case-by-case basis, and subject to viability considerations. Developers shall have regard to the most up to date version of the SHMA.
- 7.7 Ford Neighbourhood Plan Policy H2 (Housing Mix) states that proposals for new housing must deliver a range of house types and tenures including bungalows, sheltered accommodation, self-build and shared equity properties.
- 7.8 ADC Local Plan Policy AH SP2 (Affordable Housing) seeks to secure minimum 30% on-site affordable housing. Affordable housing must be visually indistinguishable from market housing with large groupings of single tenure dwellings or property types avoided. Affordable housing units shall be permitted in small clusters throughout development schemes. The affordable dwelling mix should comprise of the following range of homes unless evidence indicates otherwise.

- 1 bedroom 35 – 40%
- 2 bedroom 35 – 40%
- 3 bedroom 15 – 20%
- 4+ bedroom 5 – 10%

7.9 We note ADC's most recent published SHMA (Updated Housing Needs Evidence – Sept. 2016) states the suggested broad housing tenure and mix needs are as provided below in **Figure 5**:

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	5-10%	40-45%	35-40%	10-15%
Intermediate/ Starter Homes	15-20%	50-55%	25-30%	0-5%
Affordable Rented	35-40%	35-40%	15-20%	5-10%

Figure 5 - SHMA (2016) Housing Mix and Tenure Needs

7.10 ADC Design Guide J.09 (Inclusive Design & Adaptability) also states all major housing developments should include an appropriate level of affordable housing, the quality of which should be indistinguishable from private rented homes in order to encourage social inclusion and community cohesion. L.03 (High Quality & Development) also seeks to ensure all development remains 'tenure blind' with no difference between the quality of market and affordable housing.

Planning Assessment

7.11 The proposed RM1 and RM4 developments will cumulatively deliver a total of 697 x homes out of the outline allowance for up to 1,500 homes. The RM1 phase will deliver 340 x homes, whereas the RM4 phase will deliver 357 x homes. Alongside the proposed 487 x market homes, both applications will also deliver 30% affordable housing, cumulatively totalling 210 x new affordable homes comprising intermediate First Homes, intermediate shared ownership and affordable/social rent homes.

7.12 The outline consent and its corresponding S106 legal agreement secured the provision of 30% affordable housing site wide, as defined by "Affordable Housing Provision" which *"means the 30% (thirty percent) of Dwellings constructed on the Land within the Development to be provided (subject to the terms of this Agreement) as Affordable Housing Dwellings and First Homes in accordance with the Affordable Housing Scheme and Affordable Housing Parcel Scheme."*

7.13 "Affordable Housing" as defined within the S106 is *"any form of housing identified within legislation national planning policy framework or a ministerial statement as meeting the requirements of affordable housing planning obligation under Section 106 of the Act (or any successor legislation), but is not limited to:*

- *affordable rented housing;*
- *shared ownership housing;*
- *intermediate housing (including intermediate rent, shared equity and low cost homes for sale) or any other form of intermediate tenure as may be agreed by the District Council;*

- *discounted market sales; or*
- *starter homes as specified in Sections 2 and 3 of the Housing and Planning Act 2016.”*

7.14 First Schedule, Part 1 (1)(1.2) obligates the applicant to submit as part of the Phasing Strategy an Affordable Housing Scheme for each Reserved Matters Area and a subsequent Affordable Housing Parcel Scheme for approval prior to commencement of development.

7.15 “Affordable Housing Scheme” means a written scheme submitted to and agreed by the District Council pursuant to paragraph **Error! Reference source not found.** of Part 1 of the First Schedule which sets out details:

- a) of the number of the Affordable Housing Dwellings and First Homes within the Development it being agreed that the number of Affordable Housing Dwellings and First Homes within a Phase need not total 30% (thirty percent) of the Dwellings within that Phase so long as it can be demonstrated that the Phasing Strategy has been complied with and overall 30% (thirty percent) of the Dwellings on the Development are to be provided as Affordable Housing and First Homes;*
- b) demonstrating compliance with the Affordable Housing Standards.*

7.16 “Affordable Housing Parcel Scheme” means a scheme for the provision of Affordable Housing and First Homes within a Reserved Matters Area which includes a plan and accommodation schedule showing the location dwelling type and tenure mix of the Affordable Housing Dwellings and First Homes for the relevant Reserved Matters Area to be submitted to and approved in writing by the District Council pursuant to paragraph **Error! Reference source not found.** of Part 1 of the First Schedule and any amendment or replacement to that scheme which the District Council may approve from time to time it being agreed that the number of Affordable Housing Dwellings and First Homes within a Reserved Matters Area need not total 30% (thirty percent) of the Dwellings within that Reserved Matters Area so long as it can be demonstrated that the Affordable Housing Scheme can be complied with.

7.17 In terms of tenure split, First Schedule Part 2 (2)(2.1) of the S106 requires that 25% of the Affordable Housing Provision comes forward as First Homes (an intermediate discount market sale tenure), meaning the remaining 75% of affordable homes will come forward in accordance with the either the S106 defined “Approved Community Body Tenure Split” or the “Registered Provider Tenure Split”.

7.18 “Approved Community Body Tenure Split” means:

- *37% (thirty seven percent) of the Affordable Housing Provision to be Affordable Rented Housing;*
- *38% (thirty eight percent) of the Affordable Housing Provision to be Intermediate Housing;*
- *or such other alternative tenure split which the District Council may approve.*

7.19 “Registered Provider Tenure Split” means:

- 67% (sixty seven percent) of the Affordable Housing Provision to be Affordable Rented Housing;
- 8% (eight percent) of the Affordable Housing Provision to be Intermediate Housing;
- or such other alternative tenure split which the District Council may approve.

7.20 Across both RM1 and RM4 phases, the total quantum of development equals 697 x residential dwellings, comprising 487 x market tenure homes, and 210 x affordable tenure homes (30%). The combined RM1/RM4 unit mix is provided below in **Table 4**:

Table 4 - RM1 and RM4 Combined Unit Mix

	RM1	RM4	Combined	
Dwelling Type	Number of Units			%
1 Bed apartment	38	15	53	7.6%
2 Bed apartment	34	18	160	23.0%
2 Bed house	44	64		
3 Bed house	147	170	317	45.5%
4 Bed house	72	83	155	22.2%
5 Bed house	5	7	12	1.7%
Total	340	357	697	

7.21 The proposed unit type and affordable mix for each phase is provided below in **Table 5** for RM1 and **Table 6** for RM4.

Table 5 - RM1: Proposed Market and Affordable Housing Mix

	Private	Affordable	Combined	
Dwelling Type	Number of Units			%
1 Bed apartment		38	38	11.2%
2 Bed apartment		34	78	22.9%
2 Bed house	44			
3 Bed house	125	22	147	43.2%
4 Bed house	64	8	72	21.2%
5 Bed house	5		5	1.5%
Total	238	102	340	

Table 6 – RM4: Proposed Market and Affordable Housing Mix

	Private	Affordable	Combined	
Dwelling Type	Number of Units			%
1 Bed apartment	3	12	15	4.2%

	Private	Affordable	Combined	
Dwelling Type	Number of Units			%
2 Bed apartment	6	12	82	23.0%
2 Bed house	26	38		
3 Bed house	132	38	170	47.6%
4 Bed house	75	8	83	23.2%
5 Bed house	7		7	2.0%
Total	249	108	357	

7.22 The proposed affordable housing types for both the RM1 and RM4 applications are further detailed within the following supporting plans (please also refer to associated house and apartment type drawings for details of individual layouts) which are also provided at **Appendix I**:

- *RM1: Proposed Housing Mix and Tenure Plan (ref. 180641-RMN1-MP-P004)*
- *RM4: Housing Tenure Plan – A (ref. 22.1706.2060A)*

7.23 In terms of tenure distribution across each phase, and in accordance with the S106 tenure requirements and the proposed affordable housing layouts referenced above, we set out below in **Tables 7-10** indicatively how the “Approved Community Body Tenure Split” or alternatively how the “Registered Provider Tenure Split” could potentially come forward for each of the RM1/RM4 phases – noting the final tenure and unit mix will be subject to negotiations with affordable housing providers and would be secured in accordance with the S106 First Schedule Part 1, para 1.3 via the submission and approval of an “Affordable Housing Parcel Scheme” prior to commencement of development:

Table 7 – RM1: Indicative Approved Community Body Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (37%)	%	Intermediate (38%)	%
1 Bed apartment	38	37.3%	10	41.7%	12	30.0%	16	42.1%
2 Bed apartment	34	33.3%	14	58.3%	15	40.0%	5	13.2%
2 Bed house	4	3.9%			1			
3 Bed house	18	17.6%			4	10.0%	17	44.7%
4 Bed house	8	7.8%			8	20.0%		
Total	102		24	24%	40	39%	38	37%

Table 8 – RM1 - Indicative Approved Registered Provider Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (37%)	%	Intermediate (8%)	%
1 Bed apartment	38	37.3%	17	65.4%	21	31.8%		
2 Bed apartment	34	33.3%	9	34.6%	25	39.4%		
2 Bed house	4	3.9%			1			
3 Bed house	18	17.6%			11	16.7%	10	100%
4 Bed house	8	7.8%			8	12.1%		
Total	102		26	25%	66	65%	10	10%

Table 9 - RM4 - Indicative Approved Community Body Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (37%)	%	Intermediate (38%)	%
1 Bed apartment	12	11.1%			12	28.6%		
2 Bed apartment	12	11.1%		100%	12	33.3%		27.0%
2 Bed house	38	35.2%	26		2		10	
3 Bed house	38	35.2%			8	19.0%	27	73.0%
4 Bed house	8	7.4%			8	19.0%		
Total	108		26	24%	42	39%	37	34%

Table 10 - RM4 - Indicative Approved Registered Provider Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (37%)	%	Intermediate (8%)	%
1 Bed apartment	12	11.1%			12	16.7%		
2 Bed apartment	12	11.1%		77.8%	12	33.3%		55.6%
2 Bed house	38	35.2%	21		12		5	
3 Bed house	38	35.2%	6	22.2%	28	38.9%	4	44.4%
4 Bed house	8	7.4%			8	11.1%		
Total	108		27	25%	70	67%	11	8%

7.24 Cumulatively, across both RM1 and RM4 phases, the indicative affordable unit and tenure mix that is envisioned to come forward is provided below in **Tables 11 and 12**.

Table 11 - RM1/RM4 - Indicative Cumulative Community Body Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (37%)	%	Intermediate (38%)	%
1 Bed apartment	50	23.8%	10	20.0%	24	29.3%	16	21.3%
2 Bed apartment	46	21.9%	14	80.0%	27	36.6%	5	20.0%
2 Bed house	42	20.0%	26		3		10	
3 Bed house	56	26.7%			12	14.6%	44	58.7%
4 Bed house	16	7.6%			16	19.5%		
Total	210		50	24%	82	39%	75	36%

Table 12 - RM1/RM4 - Indicative Cumulative Registered Provider Tenure and Unit Mix

Bedrooms	No. of Units	%	First Homes (25%)	%	Affordable Rent (67%)	%	Intermediate (8%)	%
1 Bed apartment	50	23.8%	17	32.1%	33	23.9%		
2 Bed apartment	46	21.9%	9	56.6%	37	36.2%		26.3%
2 Bed house	42	20.0%	21		13		5	
3 Bed house	56	26.7%	6	11.3%	39	28.3%	14	73.7%
4 Bed house	16	7.6%			16	11.6%		
Total	210		53	25%	138	66%	19	9%

- 7.25 As outlined above, the RM applications unit mixes are in broad accordance with ADC SHMA expectations, noting that the RM1 and RM4 phases are outer perimeter phases, which have been advocated for within the Design Code as less dense and more suited to larger house types.
- 7.26 As part of future RM phases, much of the future housing delivery across the site will comprise a higher proportion of 1-bed, 2-bed and 3-bed housing which will over the course of the site-wide build out will bring site-wide housing delivery in line with SHMA identified housing needs.
- 7.27 All the affordable housing is visually indistinguishable from market housing with an avoidance of large groupings of single tenure dwellings or property types avoided. Affordable housing units are provided in small clusters of no more than 20 x homes/cluster as per recommendations set out within the outline applications Officer's Report.
- 7.28 Given that ADC cannot currently demonstrate a five-year housing land supply, nor are meeting the Housing Delivery Test, the presumption of sustainable development is applied, and the delivery of new market and affordable housing is considered to carry significant weight within the planning balance when assessing proposed developments. Notwithstanding, the proposed housing and indicative affordable tenure mixes are in broad accordance with SHMA housing needs across both market and affordable tenures and therefore considered acceptable and in compliance with S106 housing tenure requirements plus ADC Policy H DM1 and AH SPD1, and FNP Policy H2.

- 7.29 The final affordable tenure and mixes will be subject to ongoing negotiations with ADC, Community Bodies (i.e. Ford Community Land Trust) and other Registered Providers to allow the affordable housing provision to be secured as part of future 'Affordable Housing Parcel Scheme' which will be secured in accordance with the First Schedule Part 1, para 1.3 of the S106 via the submission and approval of an "Affordable Housing Parcel Scheme" prior to commencement of development of each phase.

Layout

- 7.30 For detailed layout of each reserved matter phase, please refer to the following submitted drawings:
- IRM: *Enabling Infrastructure General Arrangement (2205771-D100_RevP12)*
 - RM1: *Proposed Site Layout and Roof Plan (180641-TOR-RMN1-MP-P003)*
 - RM4: *Phase 4 Proposed Site Layout (22.1706.1000_RevJ)*

Policy Summary

- 7.31 NPPF Paragraph 135 states that developments should function well and add to the overall quality of the area; is visually attractive as a result of good architecture, layout, scale and effective landscaping; is sympathetic to local character, the built environment and surrounding landscape context; establishes a strong sense of place through layout, design and movement networks; optimises the potential of sites alongside an appropriate mix of development; and creates places that are safe, inclusive and accessible.
- 7.32 Local Plan Policy D DM1 (Aspects of Form and Design Quality) seeks to ensure development makes the best use of land available by reflecting or improving the character of the site and surrounding area, partially through design. To achieve this, various considerations should inform design and site layout, including site conditions, character of the site and surrounding area, residential amenity (i.e. privacy, overlooking, daylight/sunlight), innovative design, adaptability, crime prevention, existing landscape, street patterns, public realm, movement networks, legibility, density and scale. All development should also comply with ADC's adopted Design Guide.
- 7.33 ADC Design Guide D.01 (Site Appraisal) of the ADC Design Guide advocates for undertaking an early-stage site appraisal to identify opportunities and constraints presented by various aspects of the site to identify the unique characteristics of a site. In particular, site layout should consider the immediate and wider area, including topography, orientation, environmental and landscape features, boundaries, built form, layouts and connections with existing infrastructure and movement networks to link key locations.
- 7.34 ADC Design Guide E.01 (Using the Site's Features and Natural Resources) of the ADC Design Guide similarly advocates for utilising the site's features and natural resources for informing site layout, including topography, orientation, landform, drainage patterns, field patterns and existing landscape features.
- 7.35 ADC Design Guide F.01 (Creating a Network of Streets, Footpaths, Cycleways & Access Arrangements) seeks to ensure that mobility networks as a first principle should be accessible by all users of all abilities. Street networks should create coherent, legible routes, and enable logical block and plot layouts which respond to natural

desire lines, existing topography, and connections outside the site. Site-wide movement frameworks should incorporate a range of routes in order to offer people a choice over how to move, and follow a clear street hierarchy which defines the order or ranking of a street through width, frontages, parking arrangements, materials and street planting. All pedestrian pavements should be min. 2.0m wide and where bus stops are provided, these should be provided min. every 400m.

- 7.36 ADC Design Guide G.03 (Layout & Plot Size) states that clarity of layout should be achieved through the careful management of buildings and spaces, both of which should take priority over roads and car parking to avoid car dominated street scenes. Perimeter blocks are promoted which allow for the delivery of adequate amenity space, parking and natural ventilation and a distinguishment between public and private realm. Blocks should typically not be uniform, but should rather reflect and contribute to the character of a street. Consideration should also be given to building lines, front defensible spaces, and location of key marker buildings to assist with legibility.
- 7.37 Alongside the approved Design Code, condition 4 (approved drawings) of the outline consent stipulates that future development at this site shall be brought forward in accordance with the following the parameter plans. These have set clear design and layout principles which all future development must accord with:
- *Access and Movement Parameter Plan - RG-M-122 Rev. M*
 - *Green and Blue Infrastructure Parameter Plan - RG-M-121 Rev. N*
 - *Land Use and Density Parameter Plan - RG-M-123 Rev. L*

Planning Assessment

- 7.38 The Design Code has been developed following a landscape-led approach as advocated within the Arun Design Guide. The proposed layouts utilise the natural features of the site to assist with integrating them into the site-wide context, which we note comprises:
- Natural topography of the site, which generally runs west to east in the northern portions of the site, and north to southwest in the southern parts of the site.
 - Neighbouring agricultural fields, particularly to the west, east and south of the site which create semi-rural edges to the site;
 - Existing boundary planting, mostly comprising mature hedgerows along the northern, southern and eastern boundaries;
 - Existing tree groups within the site, particularly along Arun Way and adjacent the northern part of the primary spine road;
 - Built form, character and connections to the neighbouring villages of Ford, Yapton and Climping, whilst also protecting against coalescence;
 - Adjacent industrial uses, particularly constraints associated with noise and odour.
- 7.39 From a technical perspective, site layout across the outline site and each RM phase has been informed by site topography, particularly to accommodate the surface water drainage strategy. The site is for the most part is a similar and fairly level topography but does slope slightly from west to east in the northern part of the site, and north to

southwest within the southern part of the site. Site-wide storage SuDS basins are therefore proposed along the eastern and southern boundaries of the site (both of which are respectively located in Landings Green POS and Ryebank Park POS within the IRM phase) and in accordance with the approved parameter plans. The street/swale network similarly follows the natural topography of the site and helps inform the block structure for each phase.

- 7.40 The location of the primary spine road corridor was approved via the outline permission's 'Access and Movement Parameter Plan'. As per the paragraph 4.16 of the Design Code, the primary spine road must deliver all of the following:
- Be linear but include a gentle meandering alignment that creates visual interest and prohibits excessive vehicle speeds;
 - Where possible, be informed by the alignment of structural planting, existing and proposed, to provide a balance between the built and natural environment;
 - Include variations in the overall width of the movement corridor, to inform and reflect the character of distinctive areas along its length; and
 - Include a widening at the heart of the local centre to create a new open space around which all retail and community spaces can front on to.
- 7.41 The primary spine road comprises a bi-directional 6.5m wide single carriageway with a 3.5m shared pedestrian/cycle path along the eastern side of the corridor and 2.0m footpath along the western side of the corridor. The northern section of the primary road includes wider verges for street tree planting, whereas within the southern part of the site, primarily comprises drainage swales and street tree planting on either side of the carriageway.
- 7.42 An informal grid structure of secondary and tertiary streets, including footpaths and cycle paths within the RM1 and RM4 phases connect into the primary spine road and assist with the establishment of a cohesive and legible movement hierarchy and block structure that provides good levels of connectivity across the site.
- 7.43 The Design Code advocates for a graduation from the more informal block types around the edges of the site, where the development is expected to softly integrate with the surrounding semi-rural context, into a more structured intermediate, compact and regular block typologies towards the Local Centre where an increase in scale is more supported both within the outline parameter plans and the Design Code.
- 7.44 The block structure and layout across both RM1 and RM4 is further delineated by the establishment of the various character areas across the site. We summarise the key guiding principles for each character area below in **Table 13**.

Table 13 - Summary of Character Area Guiding Principles

Character Area	Defining Principles
Ford Lane (RM1)	• Northern gateway to the new development, and the wider Ford when approaching from Yapton in the west. • Semi-rural development creating an appropriate transition to the existing development on Ford Lane.

Character Area	Defining Principles
	Built form and character to create a strong connection to historic Ford.
St. Mary's Meadow (RM1)	- Soft, informal interface with the rural landscape. - Landscaped edge that gives soft filtered views of the development edge and provides opportunities for pedestrian and cycle movements to the Arun Way. - Organic and loose block structure. - Key movement corridors draw the open landscape from the west into the development. - High degree of variation in architectural forms, detailing, materials, and set backs, to give a softer, more rural feel. - Establish a sympathetic relationship with St Mary's Conservation Area and the Meadow Gardens development visible across the fields.
Arun Way & Landings Green (RM1 & IRM)	- A framework of gently meandering, green streets, created by wider verges and enhanced tree planting along key movement corridors. - A bold, confident edge to the public open spaces of the Arun Way and Landings Green. - Transition from the rural edges to The Heart of Ford. - Roads running east to west should terminate at natural break points within the tree belt, providing connectivity into Landings Green and onwards to historic Ford and Ford Train Station. - More traditional architectural character that draws on the local vernacular and agricultural buildings around Ford.
Runway (RM4)	- This area shall be a celebration of the industrial heritage of the airfield which must be reflected through the landscape and built form of the proposals. - The creation of a new linear park that reflects the alignment of Runway 07. - Transition from the rural edge of Ryebank Park to The Heart of Ford. - Formalising elements through front boundary and landscape treatments. - Creation of a unique character that ensures a clear distinction from the built development of Yapton and assists with avoidance of coalescence.

Character Area	Defining Principles
Runway Park (RM4)	- Gently curved edge that follows the natural curved profile of the park. - A framework of weaving green corridors created through a network of swales that form part of the blue infrastructure strategy for the southern neighbourhood. - Built form to provide a harmonious relationship with the Runway character area. - Contemporary architecture through the fenestration and architectural detailing.
Ryebank Park (RM4)	- Landscape setting to provide physical and visual separation from adjacent settlements. - Significant blue infrastructure to sustainably manage the surface water drainage for the southern neighbourhood. - A definitive development edge will be created through the new contemporary architecture to create a distinctive character to the proposals. - Combination of the above to create a southern gateway with sense of arrival from Yapton Road.

7.45 The proposals ensure that each of the character areas will have their own distinct identity but will complement each other to allow a subtle transition between the adjacent areas. This harmonious relationship will avoid jarring juxtapositions between character areas and result in more cohesive masterplan.

7.46 As set out above, the proposed layout for each RM phase is considered to be in accordance with the Design Code, Local Plan Policy D DM1 and Arun's Design Guide and is therefore acceptable in design and policy terms.

Scale

Policy Summary

7.47 NPPF Paragraph 135 states that developments should function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout, scale and effective landscaping; is sympathetic to local character, the built environment and surrounding landscape context; establishes a strong sense of place through layout, design and movement networks; optimises the potential of sites alongside an appropriate mix of development; and creates places that are safe, inclusive and accessible.

7.48 Further, NPPF Paragraph 128 states that development should be supported where it makes an efficient use of land, particularly where development meets identified needs, makes use of existing infrastructure, promotes and prioritises sustainable travel modes, maintains an area's prevailing character, promotes regeneration, and secures well-designed, beautiful and attractive places.

7.49 Policy D DM1 (Aspects of Form and Design Quality) states the scale of development should generally 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.

7.50 The supporting text states:

For development to be successfully integrated within the existing environment, scale is an important design element. When designing to the local character of building forms, patterns of development and the natural environment, the scale of new development should:

- *Avoid obscuring public views, vistas and skylines;*
- *Ensure the height and massing does not interrupt or debase the rhythm of an existing building/roof line and overall streetscape, or detract from the local and wider area's character;*
- *Respect the existing scale in the detailing and composition of elements such as windows, doors etc;*
- *Have regard for the principal users of development schemes – people; so that buildings and infrastructure are scaled for their maximum benefit and enhance their experience of the space; and*
- *Taller buildings are more suited to key locations such as on corners, along principal routes, the end of vistas or around parks but this would be more site specific.*

7.51 ADC Design Guide J.02 (Scale & Massing) states that the appropriate scale for new buildings should be determined by their context, their location within the order of streets, and their function and positioning. Further, buildings which face onto open landscape should generally be smaller scale to avoid stark contrasts at the edge of development sites. Development should generally respond to the existing scale and massing of the surrounding built environment, although an uplift in scale can be appropriate for landmark buildings or facilities in key locations. Small variations in height through differing ridge and eaves heights and varying frontage widths are also considered to add interest to street scenes subject to careful design and integration.

7.52 ADC Design Guide G.02 (Density & Uses) states the scale and density of development should ensure that places are walkable, navigable, feel comfortable and enable people to carry out their daily activities with ease. Density should be appropriate to location, balancing the need for efficient use of land with a design that responds to and enhances the existing character of the site or wider locality, with higher densities in village centres and along strategic routes where there is good access to public transport and facilities. Densities should decrease with distance from the centre of a settlement, to ensure that development relates sensitively to its setting and addresses the edges of the site in a positive way, particularly where development is adjacent to settlement gaps or open fields. Given densities should be achieved over wider areas, a range of dwelling types and sizes should be provided to add variety, interest and to meet local housing needs.

Planning Assessment

- 7.53 For detailed building heights of each reserved matter phase, please refer to the submitted Design and Access Statements and the following submitted drawings:
- RM1: *Proposed Storey Heights Plan (180641-TOR-RMN1-MP-P006)*
 - RM4: *Phase 4 Storey Heights Plan - A/B/C (22.1706.2010_RevB / 22.1706.201_RevB / 22.1706.2012_RevB)*
- 7.54 The outline permission was supported by an illustrative masterplan that was endorsed by the Council prior to the outline consent on the basis that the outline masterplan demonstrated a sustainable layout for future housing delivery to come forward at appropriate densities that were in keeping with local character and scale.
- 7.55 The Design Code built on the vision set out within the outline masterplan and was based on further robust site analysis and engagement with ADC officers, Ford/Yapton/Climping parishes, and the broader community. The Design Code identifies and promotes the establishment of 7 x unique and complementary character areas that would deliver a range of housing types at varying density ranges, both of which help the site transition from semi-rural to urban and in accordance with the outline permission approved 'Land Use and Density' parameter plan.
- 7.56 As per the approved 'Land Use & Density' parameter plan, the outline permission allows for residential densities across three separate density zones ranging from lower density (20-35dph), medium density (27.5-42.5dph), and higher density (35-50dph). To demonstrate compliance with the approved density ranges, supporting analysis is provided within each Code Compliance Statement that support the RM1 and RM4 submissions.
- 7.57 Further, the approved 'Land Use & Density' parameter plan allows for building heights typically ranging from 2-2.5 storeys and up to a maximum 3-storeys across the majority of the residential areas, but up to 4 storeys within the Local Centre.
- 7.58 The Design Code adds further detail in relation to acceptable building heights within each respective character area as follows:
- RM1:
 - St. Mary's Meadow: Up to 2 storeys
 - Ford Lane: Up to 2 storeys
 - Arun Way & Landings Green: Predominately 2 storeys (But up to 3 storeys permitted along key movement/green corridors or to prominent frontages and corners)
 - RM4:
 - Ryebank Park: Up to 2 storeys
 - Runway Park: Predominately 2 storeys (But up to 3 storeys permitted along key movement/green corridors or to prominent frontages and corners)
 - Runway: Predominately 2.5 storeys (But up to 3 storeys permitted along key movement/green corridors or to prominent frontages and corners)

- 7.59 All of the proposed buildings within both RM1 and RM4 phases are within the acceptable height ranges detailed in the outline permission and Design Code, with the only buildings that are 3-storeys in height being blocks of flats which are located along the primary spine road and in key marker locations where they assist with site-wide legibility. Where appropriate, a range of building heights have been proposed to create interest and variety along street scenes.
- 7.60 On the basis of the above, the proposed building heights are considered compliant with the Design Code, Local Plan Policy D DM1 and Arun's Design Guide and are therefore considered acceptable in policy and design terms.

Plot Layout, Setbacks & Separation Distances

Policy Summary

- 7.61 ADC Design Guide G.03 (Layout & Plot Sizes) states that minimum back-to-back separation distances should be 21m provided by rear garden depths of 10.5m. In exceptional circumstances, smaller distances may be acceptable subject to other aspects achieving acceptable standards, for example, applying the 25 Degree Rule where neighbouring buildings should be below a vertical 25° line when taken from rear habitable windows.
- 7.62 For back-to-side separation distances, G.03 states these should be informed by applying the 45 Degree Rule from the centre point of the lowest window closest to the side boundary, then drawing a line 45° upwards and another 45° outwards toward the side boundary.
- 7.63 ADC Design Guide H.04 (Residential Outdoor Amenity & External Spaces) states private amenity spaces should be of an appropriate size and shape to be usable and enjoyable. Private rear gardens should have a minimum depth of 10.5 metres, and balconies a minimum of 3sqm of usable space. Building frontages should generally be set back at least 2 metres from the plot boundary to mark defensible space. However, smaller set-backs that demonstrate sufficient design quality may be accepted in specific circumstances, where justified. Figures 144-148 of the Design Guide further detail the following separation distance expectations:
- Back-to-back: 21.0m
 - Back-to-side: 14.0m
 - Back-to-boundary (POS): 12.0m
 - Front-to-front: 16.0m
 - Private rear gardens: 10.5m
 - Private front gardens: 2.0m
 - Balconies: max. 2.0m from building frontage – min. 3.0sqm usable space – min. 17.0m balcony-to-balcony distance
- 7.64 Notwithstanding the building separation/setback expectations stated above, ADC Design Guide J.02 (Scale & Massing) does suggest further mitigation measures that should be considered where min. separation distances cannot be achieved:

- Building separation distances between habitable rooms are 21m or above - No additional measures are needed to achieve a reasonable level of privacy.
- Building separation distances between habitable rooms are between 16-20m – Design initiatives such as offsetting windows and landscape screening should be used.
- Building separation distances between habitable rooms are 15m or less – Multiple design initiatives will likely be necessary, such as staggered façades, recessed balconies, mature landscaping and louvres on windows.

Planning Assessment

- 7.65 For detailed assessment of garden depths for each reserved matter phase, please refer to the following submitted drawings:
- RM1: *Proposed Garden Depths and Separation Distance Plans (180641-TOR-RMN1-MP-P007)*
 - RM4: *Phase 4 Garden Depths and Areas Plan – A/B/C (22.1706.2040,RevC / 22.1706.2041,RevC / 22.1706.2042,RevC)*
- 7.66 Overall, the proposed RM1 and RM4 applications demonstrate broad compliance with ADC Design Guidance in relation to rear garden depths and separation distances as set out above. House types have been arranged to ensure there is a limited ability to introduce direct overlooking thereby ensuring good quality residential amenity and privacy is provided.
- 7.67 Notwithstanding, there are minor instances where compliance for rear garden depths has not been achieved across both phases. In instances where strict adherence has not been achieved for rear garden depths or separation distance (ex. smaller mews streets) this is generally limited to <1.0m, and garden layouts have been set out to still ensure that well sized gardens of c. 80->100sqm are provided to ensure future residents still have high-quality and usable space that is not impacted by potential privacy issues. The minor non-compliances allow for an optimised site layout and the delivery of housing, whilst ensuring high-quality private residential amenity has been provided.
- 7.68 Across both phases, all proposed houses meet minimum front garden depths, with additional depth and variations provided across the various block structures and character areas to add interest to the emerging townscape.
- 7.69 On the basis of the above, and to ensure strategic land delivers optimised levels of housing, it is considered the proposed developments are generally compliant with the Arun Design Guide and are therefore acceptable in policy and design terms.

Appearance

Policy Summary

- 7.70 Local Plan Policy D DM1 (Aspects of Form and Design Quality) states development should 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 building materials (colour, texture), and design features. Development should also demonstrate a high

standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.

- 7.71 FNP Policy H1 (Quality of Design) states proposals for new housing or extension or alteration of existing housing must be of high quality and designed to be sympathetic to the local design style and contribute positively to the environment.

Planning Assessment

- 7.72 For detailed assessment of building types and materiality details for each reserved matter phase, please refer to the submitted Design & Access Statements and the following submitted drawings:
- RM1: *Proposed Materials Plan (180641-TOR-RMN1-MP-P010)*
 - RM4: *Proposed Material Plan – A/B/C (22.1706.2030_RevD / 22.1706.2031_RevD / 22.1706.2032_RevD)*
- 7.73 In general, the northern neighbourhood has been envisioned to become ‘A tribute to Ford’s rural character’ retaining a more traditional appearance that connects the proposals back to historic Ford and the existing development along Ford Lane.
- 7.74 The appearance of the southern neighbourhood has been envisioned to deliver a more contemporary design approach, reflecting ‘the legacy of the airfield past’ and providing a distinctive development edge adjacent to Yapton and Climping.
- 7.75 The appearance of each character area will be created by the interaction of a number of different design principles. These include:
- Boundary treatments;
 - Materials;
 - Roof forms;
 - Openings;
 - Entrances and thresholds;
 - Architectural features; and
 - Landscape features.
- 7.76 Within the Design Code a materiality matrix is provided (see Table 8.1) which provides detailed guidance on how each character area and individual buildings shall be treated, including subtle variations across each area that will assist with transitions and ensure each area is appropriate for the local character and context. This has been translated into the proposed materiality set out within the submitted Design and Access Statements and associated Materials Plans.
- 7.77 Each of the RM1 and RM4 phases have been designed in compliance with Table 8.1 of the Design Code to ensure a varied, yet cohesive and contextually appropriate design approach site-wide.
- 7.78 Given compliance with the Design Code has been achieved across both phases, the overall design approach for each RM will deliver high-quality architectural design in

accordance with Local Plan Policy D DM1 and Arun's Design Guide and is therefore acceptable in policy and design terms.

NDSS / Internal layouts

Policy Summary

- 7.79 ADC Local Plan Policy D DM1 states buildings 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.
- 7.80 ADC Local Plan Policy D DM2 (Internal Space Standards) requires internal spaces to be an appropriate size to meet the requirements of all occupants and their changing needs. Nationally Described Space Standards (NDSS) will provide guidance. ADC's Design Guide J.08 (Internal Space Standards) similarly requires all new houses to meet NDSS standards.
- 7.81 ADC's 'Accommodation for Older People and People with Disabilities' Guidance note (2020) also requires on schemes of 51 units or greater, that 50% of units to be designed to m4(2) standard- Access and adaptable dwellings, plus two additional units (4%) to be designed to m4(3) wheelchair accessible.

Planning Assessment

- 7.82 In accordance with the above, all units within both phases meet NDSS requirements, and each phase comprises minimum 50% of units meeting M4(2) standards, and 4% meet M(4)3 standards. The remaining units all meet M(4)1 standards and is therefore acceptable in policy terms.

Transport & Access

Policy Summary

- 7.83 NPPF Paragraph 115 and 116 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or if the residual cumulative impacts on road users would be severe. On this basis all applications should a) give priority first to pedestrian and cyclist movements and secondly to public transport; b) address the needs of people with disabilities; c) create safe, secure and attractive places; d) allow for efficient delivery and access for goods and services; and e) be designed to accommodate EV/low emissions vehicles.
- 7.84 Local Plan Policy T SP1 (Transport and Development) states the Council will support development which is s
- 7.85 Local Plan Policy T DM1 (Sustainable Travel and Public Rights of Way) states proposals must be located in locations with easy access to public transport, existing pedestrian/cycle networks, contributes to the extension of public transport services, makes provision for cycling and pedestrian infrastructure in accordance with WSCC standards, including cycle parking, and contributes to the provision of a joined cycle/PROW network.

- 7.86 Local Plan Policy SA1 (Ford) - Masterplan to include cycleways that link the new and Planning Assessment existing community to new facilities.
- 7.87 FNP Policy GA1 (Footpath and cycle path network) - Support will be given to proposals that improve and extend existing cycle path network.
- 7.88 To ensure developments function effectively, ADC's Parking Standards SPD recommend the following vehicular and cycle parking provision for developments within Parking Behaviour Zone 2:
- Car Parking:
 - 1B-3B units – 2 spaces/unit
 - 4B+ units – 3 spaces/unit
 - Garages count as 0.5 allocated space subject to being min. 6m x 3m internally
 - Cycle Parking:
 - 1B-2B houses – 1 space/unit
 - 3B+ houses – 2 spaces/unit
 - 1B-2B flats – 1 space/unit
 - 3B+ flats – 1 space/unit
 - Visitor Parking:
 - 20% of the total number of residential units
- 7.89 ADC's Parking Standards SPD includes various principles, namely 1) that parking provision should be sufficient to accommodate demand – whilst exploiting the potential for sustainable travel options where possible; 2) that expected levels of vehicle ownership should be determined taking account of dwelling size (rooms); unit type (houses or flats); unit tenure (private/affordable), parking provision (allocated or unallocated), control/enforcement (charges etc.); 3) 'Active' EV parking be provided for min. 20% of all parking spaces (100% for houses with driveways/garage), with all remaining spaces being 'Passive' spaces; 4) in some locations, limiting parking provision is a potential solution to ensure sustainable travel options are promoted, subject to implementation of a travel plan, there are high-levels of access for non-vehicular modes of travel, and comprehensive parking controls.
- 7.90 ADC's Parking Standards SPD 'Parking Guidance 3.2' further states:
- To satisfy the promotion of sustainable travel modes and choices it is considered that a 10% variation below the target parking demand value be allowed where appropriate travel option provision is provided including travel plans, public transport contributions (e.g. through section 106 contributions involving Strategic Allocations and Community Infrastructure Levy once adopted, for other non-strategic sized developments for offsite infrastructure of a strategic nature) and other sustainable travel initiatives. This is also as a result of increasing affordability issues resulting in young people staying with parents for longer.*
- 7.91 ADC Design Guide I.01 (Car Parking) highlights that car parking should be provided through a variety of solutions which are appropriate to their context, the size and nature

of development and the order of the street on which they're located. On-street parking is supported in various arrangements and care should be taken to avoid car parking dominating street scenes where parking is provided on-plot. Rear parking courts should only be provided where other options are exhausted and should be small scale and overlooked for safety.

- 7.92 Regarding accessible parking, the Design Guide notes that accessible parking should comprise a min. 5% of parking provision, with accessible parking provided on-plot for any accessible dwellings where possible and no greater than 20m travel distance if provided off-plot.
- 7.93 For EV parking, ADC Parking Standards SPD and Design Guide I.02 (Electric Vehicles) states EV parking should be provided for 100% of houses with driveways and/or garages, and for all other spaces that 30% are provided with 'active' provision. Where 'active' charging spaces cannot be provided, these should be provided as 'passive' spaces to enable conversion in future.
- 7.94 Cycle parking should be appropriate and conveniently located. Residential cycle storage should be sheltered, and public short-stay parking (preferably Sheffield Stands) should integrate with the natural and built environment and provide for a range of bicycle types.

Planning Assessment

- 7.95 For detailed assessment of the overall transport strategy for each reserved matter phase, please refer to the following submitted Transport Technical Notes and Travel Plans prepared by Ardent and the applicable RM1/RM4 Design and Access / Code Compliance Statements:
- *IRM_03.A - Transport Technical Note (ref. 2205771-R11)*
 - *RM1N_03.A - Transport Technical Note (ref. 2205771-R12)*
 - *RM1N_04.A - Travel Plan (ref. 2205771-R13)*
 - *RM4S_03.A - Transport Technical Note (ref. 2205771-R14)*
 - *RM4S_04.A –Travel Plan (ref. 2205771-R15)*
- 7.96 Based on the delivery of the proposed site-wide movement and connectivity infrastructure, alongside the various off-site sustainable infrastructure improvements, the proposed development will deliver significant public benefits in terms of promoting sustainable travel behaviours and a lowered reliance on private vehicles for future residents.
- 7.97 To promote sustainable travel within the site, the following measures have been incorporated into both the Design Code masterplan and each individual reserved matters application:
- Creation of a permeable site layout and block structure which provides priority for sustainable modes of transport and connectivity over vehicular movements, including integrated connections to the foot and cycleway network surrounding the site.

- The primary spine road through the site, as well as the access junctions onto Ford Lane and Yapton Road, have been designed to accommodate bus services through the site in future.
- Services and facilities such as education, retail, leisure and community will be provided within a future local centre phase that will assist with minimising trip generation and promotes sustainable travel behaviours.
- The layout of the site will emphasise sustainable access to the local centre. The central location of facilities will minimise journey distances for all residents, and the parking strategy for these buildings will discourage the use of cars for short journeys.
- The street network within the site will encourage low speed streets, suitable for movement by all modes of travel, particularly walking and cycling. Shared pedestrian/cycleways are provided along the primary spine road, secondary streets and within key public open spaces.
- High quality cycle parking will be provided for each residence, in accordance with ADC standards.

7.98 The Design Code also sets out the overall movement framework/street typologies across the site and details the locations where active travel connections within each RM phase must integrate with the surrounding movement network. In terms of street hierarchy and typologies, all street typologies have all been designed in accordance with ADC Design Guide SPD, LTN 1/20, Manual for Streets, and WSCC highways standards and comprise the following:

- Primary Street (spine road);
- Secondary Street;
- Tertiary Street; and
- Shared Surface (Mews Streets).

7.99 The surrounding area has an interconnected network of sustainable travel opportunities, from a network of footways and footpaths to on-road and off-road cycle paths. NCN Route 2 runs along the A259 to the south of the site and the Arun Active Travel Connectivity Study Report (2020) stated that the wider site, Ford Strategic Site SD8 is *“located in an ideal location to encourage sustainable travel”*.

7.100 In addition, bus routes 500 and 700 Coastliner operate along Yapton), to the southwest of the site along Yapton Road (with potential re-routing through the site in future). These two services operate at a frequency of approximately four services an hour, in each direction. These services operate between Littlehampton and Chichester. Ford Railway Station is also located within close proximity to the north of the site, with regular services between Brighton, Bognor Regis, London Victoria, Southampton and Chichester.

7.101 Pedestrian footways and several key cycle connections are provided throughout the RM phases to give priority to sustainable modes of travel, in particular, along the primary spine road, along Arun Way (PROW 363), through Landings Green (which leads to future off-site pedestrian/cycle upgrades up to Ford Station), Ryebank Park, Runway Park, and along the RM4 secondary street (which will comprise the diverted PROW 175).

7.102 Key non-vehicular connections in and out of the wider site within the IRM, RM1 and RM4 phases are provided in accordance with outline parameter plans as follows:

- Landings Green –pedestrian/cycle connections at NW and SE corners, with the SE connection providing onward pedestrian/cycle connection to Ford Road/Ford Station.
- Ryebank Park – pedestrian/cycle connections at SW and SE corner to connect to Yapton Road and Yapton Road/Horsemere Green, respectively.
- Runway Park – pedestrian/cycle connection in SE corner onto Horsemere Green Lane
- Runway Park – pedestrian footway connection onto PROW 175

7.103 In addition to the above connectivity measures within the site, off-site, a comprehensive package of infrastructure improvements has been secured via the outline S106 to improve the sustainable travel infrastructure in the area surrounding the wider development site. The key off-site improvements include:

- The upgrading of various pedestrian crossings within proximity to the site.
- The realignment of Ford Road to enable a 2.5m – 3.0m shared pedestrian / cycleway to be provided between the junction of Ford Lane and Ford Railway Station along the western side of the carriageway.
- Provision of on-carriageway cycle lane demarcation in Yapton from Rollaston Park through to Burndell Road / Bilsham Road Junction / Yapton Village Hall and hatched green markings across junctions along the length of the route to denote the presence of cyclists and cyclist priority.
- Widening of the existing footway on the eastern side of Church Lane to provide a 2.5m – 3.0m wide pedestrian/cycleway and to connect between Horsemere Green Lane with A259 Yapton Road.
- Widening of the carriageway at Church Lane / Horsemere Green Lane junction to accommodate a 3.0m wide path on the approach to a dropped kerb and tactile paving crossing.
- Connection into the existing/diverted NCN Route 2 pedestrian /cycleway to the north of the A259 carriageway.
- Footpath from Ford Road down to the River Arun.

7.104 For vehicular parking provision, the site-wide strategy proposes a mixed parking solution, comprising predominantly in-curtilage front garden or tandem parking, but also within garages, in small groups of perpendicular on-street parking bays, and for flatted dwellings within communal parking courts. Visitor parking is typically provided on-street and has been integrated with public realm/street trees to ensure parking arrangements do not lead to street scenes being overly dominated by vehicles.

7.105 WSCC guidance splits West Sussex into 5 x Parking Behaviour Zones (PBZs) based on proximity to alternative transport modes and local amenities of which only three PBZs are applicable within ADC – noting the site is located in PBZ 1.

7.106 As agreed with WSCC highways during pre-application discussions, the scale, land uses and betterments to public transport, walking and cycling infrastructure included

within the consented development means that it is more appropriate to apply the Arun parking standards for PBZ 4 to the flats specifically. This results in a standard of 1 space for each 1 and 2-bed apartments.

- 7.107 Both RM1 and RM4 phases include the provision of flats – typically located along the primary road – where the proposed bus link will travel along through the site (which also connects through to Ford railway station), as well as nearby proximity of the flatted units to continuous pedestrian and cycleways through the site, and to the wider area. The flats are part of a wider development, which includes the provision of a range of complimentary land uses within easy walking and cycling distance, further reducing the requirement for future residents to require a car.
- 7.108 We have reviewed the Nomis 2021 Travel to Work data for Output Area Arun 006, which covers the site area, Yapton and Ford which confirms the following mode share for residents in the local area (discounting work from home data), which concludes that an estimated 78% of movements are associated with private vehicle travel.

Mode	Mode Share
Train	2%
Bus, minibus or coach	2%
Taxi	0%
Motorcycle, scooter or moped	1%
Driving a car or van	78%
Passenger in a car or van	5%
Bicycle	4%
On foot	6%
Other method of travel to work	2%

Figure 6 - Travel to Work Data (Nomis 2021)

- 7.109 Further, a review of an analysis of Census data for the Yapton E05009822 Ward that the site is located within shows that existing residents within flats (of all sizes) only own cars at a rate of 0.88 cars per dwelling.
- 7.110 In accordance with Local Plan Policy T SP1, which supports development that is designed to reduce the need to travel by car, improves public transport accessibility, provides safe access to the road network and prioritises pedestrian and cycle movements, plus that the proposed developments provides appropriate sustainable travel options, including travel plans, public transport contributions and other sustainable travel initiatives, that there is robust justification to apply paragraph 3.2 of the ADC Parking Standard SPD which allows a 10% reduction in parking provision site-wide.
- 7.111 We note Travel Plans have been submitted along both the RM1/RM4 submissions which sets out further initiatives that will be undertaken to further reduced the reliance

on vehicular travel – with a target of reducing the mode share of single occupancy vehicle use by 10% against current observed levels.

- 7.112 We summarise the proposed vehicular and cycle parking provision for each phase below in **Table 14**:

Table 14 – Proposed RM1/RM4 Vehicle Parking Provision

Vehicular Parking Type	RM1 (North)	RM4 (South)
Allocated Housing Spaces	546	631
Garage Spaces (at 0.5 provision)	30	43
Allocated Accessible Spaces (houses & apartments)	25	24
Visitor Spaces	80	85
Visitor Accessible Spaces	5	5
Allocated (Apartment) Spaces	78	39
Service (Sub-station) Spaces	3	2
Allocated Residential Vehicle Total	679	737
Visitor/Service Total	767	829

- 7.113 ADC and WSCC parking standards require 2 allocated parking spaces per 1-3-bedroom dwellings and 3 allocated parking spaces for dwellings of 4+bedrooms. Visitor parking needs to be provided at a ratio of 20% of total residential dwellings. Additionally, a minimum 5% of parking provision should be accessible parking, with accessible parking provided on-plot for any accessible dwellings where possible and no greater than 20m if provided off-plot.

- 7.114 We set out below in **Table 15** and **Table 16**, the parking requirements against both ADC and WSCC standards, for both RM1 and RM4 respectively, noting that the parking provision for each phase are compliant with ADC standards once applied the 10% variation. RM1 totals 92.3% provision against ADC standards, whereas RM4 totals 94.5% provision (when excluding allocated service (i.e. sub-station) parking).

Table 15 - RM1: ADC/WSCC Parking Requirements

Dwelling Type	Number of Units	ADC Parking Requirement	WSCC Parking Requirement	ADC 90% Compliant
1 Bed apartment	40	80	40	39
2 Bed apartment	32	64	32	29
2 Bed house	44	88	88	79
3 Bed house	147	296	296	266
4 Bed house	72	216	216	195
5 Bed house	5	15	15	14
Total Allocated	340	759	687	683

Dwelling Type	Number of Units	ADC Parking Requirement	WSCC Parking Requirement	ADC 90% Compliant
Total w Visitor	+68	827	755	744

Table 16 – RM4: ADC/WSCC Parking Requirements

Dwelling Type	Number of Units	ADC Parking Requirement	WSCC Parking Requirement	ADC 90% Compliant
1 Bed apartment	15	30	15	27
2 Bed apartment	18	36	18	32
2 Bed house	64	128	128	115
3 Bed house	170	340	349	306
4 Bed house	83	249	249	224
5 Bed house	7	21	21	19
Total	357	804	780	723
Total w Visitor	+71	875	851	788

- 7.115 In addition to the above, the proposed development will deliver policy compliant EV vehicle charging infrastructure to private dwellings.
- 7.116 Policy compliant levels of cycle parking provision is either provided within cycle stores within rear gardens, within garages, or for apartment developments within dedicated cycle stores.
- 7.117 On the basis set out above, we consider the proposed developments to be in accordance with Local Plan Policies T SP1, T DM1, SA 1, GA 1, ADC's Parking Standards SPD and the Arun Design Guide and are therefore acceptable in policy and highways terms.

Delivery & Servicing (Waste)

Policy Summary

- 7.118 Policy WM DM1 (Waste Management) states new residential development will be permitted where it has been to be designed to ensure that kerbside collection is possible for municipal waste vehicles and where appropriate, communal recycling bins and safe bin storage areas.
- 7.119 ADC Design Guide H.07 (Waste/ Recycling Storage Facilities & Utilities) requires development to:
- Provide sufficient space to store the volume of bins and extra capacity for all recycling waste types necessary to meet the needs of occupants, in a convenient and safe location

- Integrate waste storage facilities into the existing environment through consideration of placement, form and materials.
- Ensure convenient access for service vehicles, providing sufficient space to avoid the need for frequent turning.
- Integrate utilities with the public realm, locating cable runs underground, although not in conflict with tree roots, and ensuring that above-ground elements are placed discreetly.
- Provide convenient utilities maintenance access

Planning Assessment

7.120 For detailed assessment of the overall waste/delivery strategy, including swept path analyses for each reserved matter phase, please refer to the following submitted Transport Technical Notes prepared by Ardent and the following submitted drawings:

- *IRM_03.A - Transport Technical Note (ref. 2205771-R11)*
- *RM1N_03.A - Transport Technical Note (ref. 2205771-R12)*
- *RM1N: Proposed Refuse Strategy Plan (ref. 180641-RMN1-MP-P009)*
- *RM4S_03.A - Transport Technical Note (ref. 2205771-R14)*
- *RM4S: Proposed Refuse Strategy Plans - A/B/C (22.1706.2050_RevB / 22.1706.2051_RevB / 22.1706.2052_RevB)*

7.121 As detailed within the above referenced submission documents, all residential plots have been designed to ensure compliance with Local Plan Policy WM DM1 and Arun's Design Guide and are therefore acceptable in in policy terms.

Drainage and Flood Risk

Policy Summary

7.122 Policy W DM3 (Sustainable Urban Drainage Systems) - To increase the levels of water capture and storage and improve water quality, all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SUDS), appropriate to the size of development, at an early stage of the design process.

7.123 Proposals for both major and minor development proposals must incorporate SUDS within the private areas of the development in order to provide source control features to the overall SUDS design. These features include:

- Green roofs
- Permeable driveways and parking
- Soakaways
- Water harvesting and storage features including water butts.

7.124 Proposals for major development must also integrate SUDS within public open spaces and roads, reflecting discussion with the appropriate bodies. SUDS must therefore be integrated into the overall design of a development and must:

- Contribute positively to the appearance of the area, integrating access to allow maintenance of existing watercourses and the system.
- Effectively manage water (including its quality)
- Accommodate and enhance biodiversity by making connections to existing Green Infrastructure assets and
- Provide amenity for local residents (ensuring a safe environment)
- Retain the existing drainage network of the site and the wider area,
- Be maintained in perpetuity, supported through a Maintenance and Management Plan/Regime, including its financing, agreed with the Local Planning Authority.

7.125 In order to ensure that SUDS discharge water from the development at the same or lesser rate, as prior to construction, developers must:

- Follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations and the SUDS manual produced by CIRIA.
- Undertake up to six months groundwater monitoring within the winter period.
- Undertake winter percolation testing in accordance with BRE365.
- The proposed drainage system must be designed to ensure that there is no flooding on a 1 in 30-year storm event.

7.126 The design must also take account of the 1 in 100-year storm event plus 30% allowance for climate change, on stored volumes, to ensure that there is no flooding of properties or the public highway or inundation of the foul sewerage system. Any excess flows must be contained within the site boundary, and within designated storage areas.

7.127 FNBHP Policy EH4 (Surface Water Management) requires appropriate surface water management measures for development proposals to ensure that the risk of flooding both on-site and downstream is not increased. Consideration should be given to the use of sustainable drainage alternative to conventional drainage and must be approved by the LPA and WSCC as LLFA.

7.128 Design Guide Policy K.04 (Flood Risk & Drainage) states:

- Locates new development in areas at lowest risk of flooding (whether existing or future)
- Does not increase flood risk and decreases risk wherever possible, providing appropriate protection throughout the lifetime of the development.
- Demonstrates consideration of appropriate SuDS, and aims for these to provide additional amenity or ecological benefits.
- Demonstrates flood resilience for a 1/100 year event, in line with BREEAM 2018 Pol 03.
- Manages pollution risk entering water-bodies or sensitive receptors from stormwater runoff.
- Avoids increasing impermeable land cover, or demonstrates how this is offset.

- Retains existing drainage features and flood defences, or compensates for their loss and integrates drainage features and flood defences with the surrounding environment.

7.129 Design Guide Policy E.01 (Using the Site's Features & Natural Resources – use of SuDS) states SuDS should be used in order to mitigate flood risk, improve water quality and provide attractive, multi-purpose spaces. These systems should be taken into account from an early design stage via incorporation into the proposed Landscaping Strategy.

7.130 SuDS can be adapted to suit any site and can contain different and various components, with multiple applications and benefits to achieve sustainable water management. When creating a SuDS network, various factors need to be considered at different scales:

- Masterplan Scale: water demand, efficiency, space provision, river corridors, habitats, soil, landscape, geology
- Site Scale: existing natural drainage patterns, runoff rates, storm water features, amenities, “place making” and landscape character
- Building Scale: water efficiency features, green roofs, living walls, water butts etc.
- Drainage Hierarchy (at source infiltration)
- Site specific mitigation (water-butts)
- Swale typologies
- Connection to SuDS basins (IRM)
- Flood Risk

Planning Assessment

7.131 The surface water drainage strategy approved at outline stage (F/4/20/OUT) was divided into a northern parcel, which was drained via infiltration using a series of infiltration basins, and a southern parcel, which utilised swales, detention basins and flow control devices before discharging into drainage ditches in the private land to the west.

7.132 Subsequent ground investigations including winter groundwater monitoring were undertaken by Omnia Ltd between December and April 2024 (refer to *Infrastructure Reserved Matters Technical Note (2205771-R16)* Appendix C). The investigations recorded groundwater levels as shallow as 0.24 m bgl. As a result, infiltration systems were discarded as a method of disposal of surface water.

7.133 In line with the drainage discharge hierarchy outlined in CIRIA C753, it is proposed to attenuate flows within SuDS detention basins prior to discharging surface water into adjoining ordinary watercourses via 3 x outfalls.

7.134 Where feasible, priority has been given to above-ground SuDS features which provide amenity, biodiversity and water quality benefits. SuDS features have been designed to accommodate flows up to the 1 in 100 year plus 40% climate change.

- 7.135 The site-wide IRM surface water drainage strategy separates the site into 8 sub-catchments (6 x Drainage Areas and 2 x roundabouts) based on the natural topography of the site. Surface water runoff from each plot is conveyed either via a piped drainage network (serving the northern half of the site) or grassed drainage swales (serving the southern half) into 5 x strategic detention basins, prior to discharging at the equivalent mean greenfield runoff rate (Qbar). Flows will be controlled by a number of vortex flow controls.
- 7.136 The detention basins have been designed to include the following design characteristics:
- Maximum 1 in 3 side slopes;
 - Minimum 300mm freeboard (over the 1 in 100 year + 40%CC water level);
 - Water level (during a 1 in 100 year + 40% CC event) not exceeding 2.0m;
 - Impermeable geo-membrane to prevent groundwater ingress;
 - Forebays and bioretention features; and
 - Permanent water feature to enhance amenity and ecological benefits.
- 7.137 Site-wide Microdrainage Network Modelling results demonstrate there is not flooding onsite for all rainfall events up to the 1 in 100 year +40%CC, and there is no surcharging in the network during the 1 in 2-year event.
- 7.138 Following discussions with the LLFA, a sensitivity check was carried out using a Volumetric Run-off Coefficient (CV) value of 1. The results demonstrate that the additional site-wide runoff is stored within the available freeboard of the detention basins. All outfalls have been modelled as fully surcharged up to the flood levels (assumed as top of bank levels) in a 1 in 100 years + 40% Climate Change event.
- 7.139 The foul drainage strategy has been designed to convey foul flows to 3 x proposed adoptable pumping stations (Pump Stations 1, 2 and 3), which will in turn discharge into a fourth pump station (Terminal Pump Station 4). Foul Pump Station 4 will pump flows to Ford wastewater treatment works to the east of the site.
- 7.140 It is anticipated that the drainage systems described in this IRM application will be adopted by a private adoption company. A Maintenance and Management Plan is included within the submitted Drainage Strategies for each reserved matters applications.
- 7.141 The site-wide drainage strategy has been informed by the drainage hierarchy and robustly engineered to ensure on-site surface water drainage can be managed and maintained within the site boundaries and achieves a greenfield runoff rate. Thereby confirming no surface water flood risks would be introduced beyond the site boundaries. As demonstrated within the supporting Drainage Technical Notes for each RM phase, the drainage strategies are considered acceptable in policy and drainage terms.

Public Open Space & Landscape

Policy Summary

- 7.142 Local Plan Policy SD8 (Ford) requires proposals to maintain a visual separation between Ford and Yapton and between Climping and Ford through the layout of the development and provision of landscaped open space.
- 7.143 Ford Neighbourhood Plan Policy SA1 (Ford Airfield) requires the proposals to incorporate a network of open spaces, which are required to include parks and gardens, natural and semi-natural green space, amenity space (including village greens), sports pitches, children and young persons' play spaces and allotments, all connected via a network of footpath and cycleways that will link the new and existing community to new facilities.
- 7.144 Local Plan Policy C SP1 (Countryside) requires careful management and consideration along the rural-urban fringe where significant new development is proposed, and consideration should be taken towards landscape and biodiversity enhancement, woodland management, recreational provision and access into the countryside.
- 7.145 Local Plan Policy GI SP1 (Green Infrastructure and Development) requires major development to be designed to protect and enhance existing Green Infrastructure assets, and the connections between them, in order to ensure a joined up Green Infrastructure Network. The Green Infrastructure Network must be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.
- 7.146 Local Plan Policy SA1 (Ford Airfield) requires existing mature vegetation to be retained where possible.

Planning Assessment

- 7.147 A minimum of 16.44ha of net public open space must be provided site wide, in accordance with the approved Green and Blue Infrastructure Parameter Plan and to accord with Arun District Council's Open Space, Playing Pitches & Indoor & Built Sports Facilities SPD (2020).
- 7.148 Our principal underlying strategy across all phases and as secured by the Design Code has been to maximise the ecological value of the Arun Way greenway pocket parks, Landings Green, Runway Park and Ryebank Park providing connectivity between proposed habitat types within the broader green infrastructure (these areas are detailed in the RM4 and Infrastructure applications). The residential streets are supplementary to this but are also seen as an important element of the ecology strategy and also to maximising the visual amenity of the development.
- 7.149 Against the outline and policy compliant provision of 16.44ha of net public open space, the Design Code secures a total provision of 18.85ha of net public open space (2.41ha in excess of requirements). A full breakdown the future site-wide provision is provided below in **Table 17**:

Table 17 - Design Code Compliant Public Open Space Provision

	STANDARDS (ha)	PROVISION
Site boundary		84.48 ha
Based on 1500 dwellings		
POS types		
Amenity green space	1.98	3.04 ha
Natural and Semi-Natural green space	5.94	6.88 ha
Parks & Gardens	2.64	2.85 ha
Allotments	0.83	0.83 ha
Outdoor Sports	3.23	3.42 ha
Play provision	1.82	1.82 ha
TOTAL (POS)	16.44	18.85 ha

7.150 The three submitted RM phases will provide the majority of these required public open spaces and will include Landings Green, St. Mary's Meadow, Arun Way, Runway Park, and Ryebank Park. Each of these green spaces will deliver a biodiverse rich planting scheme, with significant new hedgerow and tree planting, alongside new formal and informal play areas, recreational trails, plus important connectivity habitat and transport corridors.

7.151 Below in **Table 18** we set out the total POS quantum that will be delivered by the initial three phases – plus remaining provision to be delivered as part of future phases:

Table 18 - Proposed POS Provision

POS Types	Site-Wide Compliant POS Provision	RM1 Delivery	RM4 Delivery	IRM Delivery	Total Proposed Provision	Remaining Provision Required
Amenity Green Space	1.980ha	0.094ha	0.172ha	0.894ha	1.160ha	0.820ha
Natural and Semi-Natural Green Space	5.940ha	0.585ha	0.488ha	5.054ha	6.127ha	(-0.187ha)
Parks & Gardens	2.640ha	-	2.777ha	-	2.777ha	(-0.137ha)
Allotments	0.830ha	-	0.830ha	-	0.830ha	(0.000ha)
Outdoor Sports	3.230ha	-	-	-	-	3.230ha
Play Space	1.820ha	0.150ha	0.270ha	0.490	0.915ha	0.900ha
Total POS	16.440ha	0.829ha	4.532ha	6.438ha	11.799	4.604ha

7.152 The proposed tree planting strategy includes a wide variety of native and ornamental species that help reflect the local native trees found on site and offer a variety of crown shapes and forms from broad rounded/oval and wide pyramidal crowns to columnar and upright form. The tree species selected are in accordance with the Design Code

Table 5.5, supplemented with additional species to create strong seasonal interest and a variety of leaf colour and forms.

- 7.153 The proposals are therefore in accordance with Local Plan Policies SD8 C SP1, GI SP1 and SA1 as well as FNP Policy SA1.

Play Space

Policy Summary

- 7.154 Policy D DM1 (Aspects of form and design quality) requires play areas to be located along public routes and spaces to prevent crime.
- 7.155 FNP Policy SA1 (Ford Airfield) states local areas for play shall include areas designed as “village greens” as well as sports pitches – to be incorporated into the masterplan.
- 7.156 Design Guide Policy H.03 (Open Spaces) states:
- Play areas should consider the intended age of the children using the space and, should be accessible to all within this age bracket.
 - These areas may be formal - marked and laid out for recreational activities e.g sports pitch or informal
- 7.157 SPD12 (Open Space, Playing Pitches & Indoor & Built Sports Facilities) requires play space to adhere to the 10 principles for designing successful play spaces, these are:
- Bespoke
 - Well located
 - Make use of natural elements
 - Provide a wide range of play experiences
 - Inclusive to all
 - Meet community needs
 - All children of different ages to play together
 - Build in opportunities to experience risk and challenge
 - Sustainable and appropriately maintained
 - Allow for change and evolution

Planning Assessment

- 7.158 Of the minimum 16.43ha required net open space, 1.815ha of formal play space must be provided throughout the site. The Play Strategy for the whole site is set out within the approved Design Code within section 3, whereas details of the individual play area designs are provided within the submitted landscape drawings for each phase of development.
- 7.159 As set out within the Design Code, the site-wide play strategy has been developed in accordance with the design requirements and principles set out in the Planning and

Design for Outdoor Sport and Play (2008) guidance produced by Fields in Trust, Play England's 'Design for Play' and Arun District Council's Open Space, Playing Pitches & Indoor & Built Sports Facilities SPD (2020).

- 7.160 The Design Code stipulates that play spaces must include a variety of play experiences, including opportunities for informal play for all age groups. The play provision for each future development phase should therefore provide a complimentary mix of play experiences as part of a site wide strategy to ensure the needs of all groups are adequately met.
- 7.161 The LEAPs and NEAPs shall be located within the principal open spaces along the eastern edge of the site and at key nodes along the principal cycle network including at the western end of Arun Way, on the edge of Yapton.
- 7.162 The location of each LEAP and NEAP shall therefore be located where activity levels are highest and in prominent locations on clear desire lines. The purpose of such is to encourage use of the play areas and maximise natural surveillance but also encourage integration of the existing and new communities.
- 7.163 The LAPs provision is proposed to be brought forward in small clusters across the site, with play provision to be distributed along a network of designated spaces and must include designated LAPs, play/fitness trails and natural play areas.
- 7.164 For each play space, the play provision must be unique, high quality and bespoke, responding to and enhancing the character of the landscape in which it sits and contributing to the developments overall sense of place.
- 7.165 To ensure that the play strategy provides a diverse variety of play experiences, a high-quality play environment and also targets key skills developments, an overarching theming strategy has been set out to ensure that all play areas are complimentary.
- 7.166 Each distinct play zone must comprise a complimentary mix of play experiences and themes. Figure 3.16 within the Design Code sets out in more detail the theme of each zone, including the types of experiences supported, the character of the spaces and the targeted skills which the play areas are intended.
- 7.167 In terms of specific play provision delivered for each of the three submitted RM applications, a series of play space landscape plans have been submitted – noting at this stage these provide the indicative details of the play provision, which will be developed into full detailed design as part of a future detailed design exercise alongside an appointed play specialist and other relevant stakeholders:
 - RM1
 - cluster of 3 x LAPs, comprising 1,500sqm in area plus a 200sqm seniors fitness trail within St. Mary's Meadow.
 - RM4
 - 1 x LAP comprising 300sqm in area within the neighbourhood park.
 - 1 x LEAP comprising 1,800sqm of play provision, plus a 400sqm sensory trail within Runway Park.
 - IRM

- cluster of 4 x LAPs, comprising 1,370sqm in area within Ryebank Park.
- cluster of 2 x LAPs comprising 600sqm in area, within Arun Way.
- 1 x LAP comprising 1,400sqm in area (to comprise a large natural play area inclusive and a parkour trail of c. 200sqm) within Landings Green.
- 2 x LEAP comprising 1,800sqm in area within Landings Green.

7.168 The play areas are located along public routes and spaces to prevent crime in accordance Policy D DM1 and the spaces consider the intended ages of children using them and are accessible to all within their respective age brackets, in accordance with Design Guide Policy H.03. Further, all play spaces are provided with the required minimum buffer distances from nearby noise receptors.

7.169 Each play area has been laid out in accordance with the Design Code and the design has sought to adhere to the 10 principles for designing successful play spaces set out within SPD12. The detailed layout of each defined play area/play trail will be secured via planning condition and further developed alongside specialist play consultants prior to implementation.

Trees

Policy Summary

7.170 Local Plan Policy ENV DM4 (Protection of Trees) states that to ensure development is planned to take a comprehensive view of tree issues at an early stage of the design process and that development does not have a negative impact on trees, proposals should be informed by the following:

- Land and tree surveys
- A tree constraints plan
- An arboricultural impact assessment to include a tree protection plan and arboricultural method statement

7.171 FNP Policy SA1 (Site Allocation) requires existing mature vegetation to be retained where possible.

7.172 FNP Policy EH1 (Protection of Trees and Hedgerows) Development proposals must be designed to incorporate biodiversity within and around developments and enhance ecological networks, seeking to retain wherever possible trees of arboricultural and amenity value and hedgerows.

7.173 ADC Design Guide E.02 (Landscape Structures & Trees) seeks wherever possible to retain and incorporate trees and hedgerows of value and that their long-term health is protected by avoiding negative impacts that may be caused by development through site design, avoidance of RPAs and targeted tree protection measures.

Planning Assessment

7.174 Where feasible, the existing landscape is to be retained and incorporated into the site-wide and reserved matters specific layouts. This approach will assist with integrating the development parcels into the existing landscape structure.

- 7.175 Some tree/hedgerow removals are required to support the reserved matters applications, which includes the removal of the tree groups surrounding the vacant highways works depot north of Arun Way within RM1 (G1004, G1005, G1006, and G1041) and the existing hedgerows along PROW 175 within RM4 (H1178, H1180, H1183, and H1186). All these hedgerows and tree groups are Category C and were assessed against their removal within the outline to allow development to come forward.
- 7.176 Further, some partial removal of individual trees along the western side of the primary spine road and along Arun Way where the roads/junctions are proposed to intersect, and around pumping stations as required. Lastly, some short lengths of tree/hedgerow removals will be required along boundaries where new/expanded connection points are proposed across all three phases.
- 7.177 For the IRM, most of the significant boundary tree cover will be retained, and none of the trees being removed within the redline boundary serve as prominent mature tree features in the wider setting.
- 7.178 In the case of RM1, the majority of significant boundary trees will be preserved other than where new access points are to be provided. And again, none of the trees being removed have been identified as being prominent within the wider setting.
- 7.179 Regarding tree removals planned for phase RM4, all affected trees are of low quality, exhibiting limited potential to enhance local character due to their poor condition and small size.
- 7.180 Each of the three submitted AIA and Method Statements concludes that the proposed developments will not cause an unacceptable or adverse impact on the character and appearance of the area from a tree perspective.
- 7.181 To supplement retained trees and enhance local character, the submitted landscape proposals as part of each RM, include tree planting schemes to ensure a net increase in tree coverage across the site. This includes in accordance with the outline parameter plans, substantial woodland buffer along the southern and eastern edges of the site near Horsemere Green Lane which will ensure no intervisibility and to protect against coalescence between neighbouring villages. Once fully established and mature, this woodland screening will ensure no adverse impacts to visual receptors as assessed as per to the outline ES.
- 7.182 In addition, significant edge tree planting around the edge of the site to assist the development incorporate into the surrounding semi-rural edges.
- 7.183 Overall, the limited loss of trees and hedgerows, when considered against the new landscaping and planting proposal, will more than sufficiently offset the loss of the existing species across the site.
- 7.184 The proposals are therefore in accordance with Local Plan Policy ENV DM4 and FNP Policies SA1, EH1, as well as ADC Design Guide Policy E.02 and are therefore considered acceptable in policy terms.

Ecology & Biodiversity

Policy Summary

- 7.185 Local Plan Policy ENV SP1 (Natural Environment) encourages and promote the preservation, restoration and enhancement of biodiversity and the natural environment for the protection of both designated and non-designated sites. Where possible it shall also promote the creation of new areas for habitats and species
- 7.186 Local Plan Policy ENV DM5 (Development and Biodiversity) requires schemes to seek to achieve a net gain in biodiversity and protect existing habitats on site. They shall also however incorporate elements of biodiversity including green walls, roofs, bat and bird boxes as well as landscape features minimising adverse impacts on existing habitats (whether designated or not).
- 7.187 Development schemes shall also be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces. Together, these provide a network of green spaces which serve to reconnect isolated sites and facilitate species movement.
- 7.188 Where there is evidence of a protected species on a proposed development site, planning applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species. This involves consideration of any impacts that will affect the species directly or indirectly, whether within the application site or in an area outside of the site, which may be indirectly affected by the proposals. All surveys shall be carried out at an appropriate time of year and shall be undertaken by a qualified and, where appropriate, suitably licensed person. All developments shall have regard to Natural England's standing advice for protected species.
- 7.189 ADC Design Guide E.03 (Biodiversity) states developments must incorporate measures to ensure that there is no net loss of biodiversity and demonstrate how or where enhancement and/ or expansion of habitats can be integrated. This should include retaining, integrating and creating ecological corridors between existing and proposed green and other suitable spaces to allow the movement of animals and continuation of viable populations.

Planning Assessment

- 7.190 Each of the three RM submissions includes comprehensive Ecological Protection and Enhancement Plans. For further details, please refer to:
- *IRM_02.A_Ecological_Protection_Enhancement_Plan*
 - *RM1_06.A_Ecological_Protection_Enhancement_Plan*
 - *RM4_06.A_Ecological_Protection_Enhancement_Plan*
 - *RM1/4_11.A_Biodiversity Net Gain Assessment*
- 7.191 The Ecological and Protection Plans detail the habitat creation and enhancement measures designed to support protected or notable species while enhancing the overall biodiversity and ecological habitats within each phase. Based on UES' assessment and enhancement and protection plans, the proposed landscape enhancement measures, which include the provision of native species rich hedgerows, native tree planting, native dense scrub, woodland structure planting, long grass margins, wildflower grassland and SuDS. The assessment concludes that each reserved matters phase will deliver a net gain for biodiversity.

- 7.192 Further, UEEC completed a Biodiversity Net Gain Assessment in April 2023 based on the an proofing layout that was prepared by the applicants prior to site acquisition that was based on the approved outline masterplan. The assessment was based on the 2023 Defra Biodiversity Metric 4.0 and a survey of the site carried out on 13th April 2023 by a suitably qualified and experienced ecologist. This assessment calculated net gain of +33.28 BU for area habitats, equivalent to +19.23%, and calculated net gain of +6.32 BU for linear habitats, equivalent to +28.29%, associated with the proofing layout development proposals.
- 7.193 A supporting letter of comfort has been provided by UEEC confirming they have reviewed the currently proposed development RM layouts and landscaping details listed below and compared them to the details on which we based their 2023 assessment. They have concluded there is a high degree of similarity between the two sets of proposals and, if the assessment were to be re-run against the current proposals, it is likely that a similar quantum of net gain would be achieved.
- 7.194 As set out above the proposals are in accordance with Local Plan Policies ENV SP1 and DM5 as well as Policy E.03 of the ADC Design Guide and are therefore considered acceptable.

Lighting

Policy Summary

- 7.195 Local Plan Policy GI SP1 (Green Infrastructure and Development) requires the Green Infrastructure Network to be protected from light pollution to ensure that areas defined by their tranquillity are protected from the negative effects of light in development.
- 7.196 Local Plan Policy QE DM2 (Light pollution) requires the application to be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications. Outdoor lighting schemes will be considered against the following criteria:
- No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation;
 - Light levels being the minimum required for security and working purposes;
 - Minimising the potential glare and spillage; and
 - The degree to which outdoor lighting can be powered by on-site renewable sources
- 7.197 FNP Policy EH8 (Light Pollution) requires applications to demonstrate through the submission of a lighting scheme that the lighting has been specifically designed to minimise the impact of the lighting on the night sky.
- 7.198 Condition 15 of the outline planning permission requires a scheme for external lighting for each phase to be submitted to and approved by ADC prior to the commencement of development (excluding demolition) of that phase. The scheme is required to ensure that the lighting is sensitive to bats and comply with the Institution of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light.

Planning Assessment

- 7.199 The submitted lighting strategy (drawing reference: OP242906LD20281) as part of the Infrastructure RM outlines the installation details for external lighting along the spine road. It demonstrates the consideration of bat sensitivity and adherence to the Institution of Lighting Professionals' Guidance Note for the Reduction of Obtrusive Light.
- 7.200 Furthermore, low-level bollard lighting is proposed along PROW 363 within Landings Green which is the primary pedestrian/cycle connection route through to Ford Station. Ecologically sensitive light specifications will be subject to detailed design and secured through the discharge of Condition 15 of the outline permission prior to commencement of development.
- 7.201 Therefore, the proposed lighting measures submitted as part of the Infrastructure RM align with Local Plan Policies GI SP1 and QE DM2, FNP Policy EH8, and Condition 18 of the outline permission.

Energy & Sustainability

Policy Summary

- 7.202 Paragraph 159 of the NPPF sets out what is expected from new developments when considering strategies to mitigate climate change, requiring new development to be planned in ways that avoid increased vulnerability to the range of impacts from climate change and can help to reduce greenhouse gas emissions.
- 7.203 Within the adopted ADC Local Plan, Policy ECC SP2 (Energy and Climate Change Mitigation) requires all new residential and commercial development to be energy efficient and demonstrate how they will:
- Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
 - Use design and layout to promote energy efficiency; and
 - Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.
- 7.204 Furthermore, Policy ECC SP2 requires all major development to produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.
- 7.205 Part G of the Building Regulations(68) requires new homes to reach an optional standard of 110 litres/person/day.
- 7.206 Condition 26 of the outline planning permission (ref: F/4/20/OUT) states:
- “At least 10% of the energy supply of the development shall be secured from decentralised and renewable or low carbon energy sources. Details of how the energy reductions will be achieved shall be submitted and secured as part of any RM application for each phase as defined by the Phasing Strategy under condition 5”.*
- 7.207 It should also be noted that Part L 2021, introduced in June 2022, represents a 31% reduction in CO₂ emissions compared to Part L1 2013. Another step-change is

expected in the Future Homes Standard which will represent a further 75-80% CO₂ reduction from 2025.

Planning Assessment

7.208 For further information please refer to the following submitted statements:

- *RM1_07.A_Energy and Sustainability Statement*
- *RM4_07.A_Energy and Sustainability Statement*

7.209 These reports have thoroughly reviewed the standards contained within the Approved Document L 2021. A 'Fabric First' approach has been proposed, that prioritises improvements to the fabric of the dwellings to avoid unnecessary energy demand and consequent CO₂ reduction.

7.210 Proposed improvements including insulation specification, efficient building services, a reduction in thermal bridging and unwanted air leakage paths and further passive design measures will enable the relevant standards to be met, whilst building in low energy design and future climate resilience to the design and construction of the dwellings for RM1 and RM4.

7.211 In addition, highly efficient air source heat pumps will be installed to all dwellings within RM1 and RM4, to meet space heating and domestic hot water demand and solar photovoltaic panels are to be incorporated in order to meet the projected ADL 2025 regulatory standards. The final detailed specification and location of PV panels will be confirmed at a later stage of detailed design, and it is proposed this be secured via an appropriate planning condition to the reserved matters permissions.

7.212 Calculations based on a sample range of house types in RM1 and RM4 demonstrate that through implementing the aforementioned strategies, including the addition of highly efficient air source heat pumps and solar photovoltaic panels, the calculated as-designed emissions are reduced by 70.37% over ADL 2021 and by 80% over the ADL 2013 regulatory standards when the TER is adjusted manually for RM1 and 70.36% over ADL 2021 and by 80% over the ADL 2013 regulated standards for RM4. This demonstrates alignment with the projected requirement for ADL 2025.

7.213 Further analysis shows that 88.65% of the predicated energy demand for RM1 and 89.89% for RM4 is met through renewable or low carbon energy generation, thereby meeting the 10% requirements for low-carbon/renewable energy to be provided as required by Policy ECC SP2 (Energy and Climate Change Mitigation).

7.214 Furthermore, as it is proposed to deliver a highly efficient air source heat pump to deliver all space heating and hot water demand with PV energy strategy, the development scheme contributes positively towards keeping energy costs low for occupants and aligning with the future homes standards and expected regulatory changes to be introduced in 2025.

7.215 For the twenty-one sample SAPs completed for RM1 and RM4, all dwellings are achieving high EPC B ratings.

7.216 It has also been demonstrated within the Energy and Sustainability statements that the calculated water consumption could equate to a maximum internal water consumption

of 108.25 litres/occupier/day for RM1 and RM4, therefore offering an improvement on the maximum of 110 litres/occupier/day allowable by Part G of the Building Regulations 2010.

- 7.217 As detailed above, the proposals are therefore in accordance with the requirements of Policy ECC SP2 of the ADC Local Plan and in accordance with condition 26 (Decentralised and Renewable or Low Carbon Energy) of the outline planning permission.

Noise

Policy Summary

- 7.218 Policy D DM1 (Aspects of form and design quality) requires applications for development to have minimal impact to users and occupiers of nearby property and land by avoiding unacceptable noise and disturbance.
- 7.219 Condition 25 of the outline planning permission requires a scheme detailing noise sources and proposed mitigation strategies relevant to that application, to be secured as part of any reserved matters consent.

Planning Assessment

- 7.220 Comprehensive noise surveys have been conducted for phases RM1 and RM4, both of which are considered to be low risk in accordance with ProPG Guidance. The main identified noise sources have been identified as being generated from neighbouring industrial uses – in particular Ford Industrial Estate and the Tyre Recycling Depot located along Ford Lane, plus road traffic noise generated from Yapton Road, Ford Lane and the future primary spine road.
- 7.221 In order to mitigate adverse noise impacts from neighbouring industrial uses, 4.0m high acoustic fencing is proposed around the boundaries of Ford Industrial Estate and the Tyre Recycling Depot along Ford Lane. As outlined within the IRM landscape strategy, both acoustic fences will be screened with appropriate landscape buffers to integrate the fencing into the development and reduce visual impacts generated by the fencing.
- 7.222 Following mitigation, for both RM1 and RM4 phases, the Noise Impact Assessment has demonstrated that noise from existing industrial uses and road traffic would not generate adverse internal or external impacts and acceptable internal and external noise environments will be achieved.
- 7.223 Where necessary the design of some dwellings that front the road noise sources will be able to control noise levels through a fixed window solution. It is important to note that windows will not be permanently sealed; residents will have the choice to open them, with the understanding that this may lead to a slight rise in noise levels. The risk of noise impact during overheating conditions within properties has been considered in accordance with Acoustics Ventilation and Overheating (AVO) guidance.
- 7.224 External sound levels in most private amenity spaces adhere to the recommended standards, though a few balconies facing the primary access road will marginally exceed the noise criteria. All public open spaces maintain external sound levels below 50dB, thereby ensuring that all residents will have access to either communal amenity spaces where external noise levels are within acceptable limits.

7.225 Consequently, the noise assessments for both RM1 and RM4 confirm the suitability of these sites for development, subject to the recommendations included in the reports. Therefore, it is considered that the requirements of Policy D DM1 and Condition 25 have been satisfactorily fulfilled.

Planning assessment and conclusion

7.226 As this section has demonstrated, this application full accords with the Design Code and local and national planning policy. The proposed development will provide a successful new community at the Landings, combining high quality public realm, public open space and a mix of desirable new market and affordable homes that meets local housing needs.

8.0 Compliance with Outline Planning Permission

- 8.1 The outline planning permission (ref: F/4/20/OUT) included conditions which control how the reserved matters are to be brought forward. The outline planning permission is also subject to a S106 legal agreement which secured a number of obligations against future phases of development. An assessment of compliance is set out below:

Outline planning conditions

Condition Number	Summary of Wording of Planning Condition	Information Submitted and Compliance with Conditions
1 (Layout, Scale, Appearance and Landscaping Details)	Condition 1 requires the details of the layout, scale, appearance and landscaping ('the reserved matters') for each phase defined within the Phasing Strategy under Condition 5 to be submitted and approved in writing by ADC before any development in that phase begins	In accordance with Condition 1 of the Outline permission, details of the layout, scale, appearance and landscaping have been submitted for the first three reserved matters applications at the site (IRM, RM1 and RM4).
4 (Parameter Plans)	Condition 4 requires development to be carried out in accordance with the following approved plans: • Site Boundary Plan - RG-M-01 Rev. T • Potential Site Access Arrangement - 3 ARM 40m ICD Roundabout- ITB13091- GA-004 Rev. B • Potential Southern Vehicular Access from Yapton Road - ITB13091- GA-001 Rev. E • Ford Airfield Geometry - Eastern Access onto Ford Road - ITB13091-GA- 066 • Access and Movement Parameter Plan - RG-M-122 Rev. M • Green and Blue Infrastructure Parameter Plan - RG-M-121 Rev. N • Land Use and Density Parameter Plan - RG-M-123 Rev. L • Demolition plan - RG-M-107E	Both RM1 and RM4 layouts are proposed in accordance with the outline parameter plans in terms of location and quantum of public open space, SuDS infrastructure, access, densities (i.e. 20-50dph) and building heights (2-3 storeys).
5	Condition 5 requires a phasing strategy to be submitted either prior to or concurrently with the	The site-wide phasing strategy has been submitted alongside these three respective reserved matters applications as a

Condition Number	Summary of Wording of Planning Condition	Information Submitted and Compliance with Conditions
(Phasing Strategy)	submission of the first Reserved Matters application.	standalone discharge of condition application.
7 (Design Code)	Condition 7 requires the submission of a Design Code for the whole application (excluding only the Employment Zone) to be submitted and approved prior to the submission of any reserved matters application.	tor&co submitted the Design Code on 30 July 2024 (ref: F/10/24/DOC). The Design Code was prepared in consultation with the local community, ADC and WSCC officers and provided further details as how the site-wide development would come forward in accordance with Condition 4 (approved parameter plans), the outline Masterplan Document (July 2021), and the Arun Design Guide SPD.
15 (External Lighting)	Condition 15 requires a scheme for external lighting for each phase to be submitted to and approved by ADC prior to commencement of development (excluding demolition).	An indicative lighting scheme (drawing reference: OP242906LD20281) has been submitted as part of the Infrastructure RM. This outlines the installation details for external lighting along the spine road Detailed lighting schemes for each RM will be submitted prior to commencement of development.
17 (Ecological Protection and Enhancement Plan)	Condition 17 requires the submission and approval of an Ecological Management Plan prior to the commencement of development.	tor&co have submitted a discharge of conditions application containing an Ecological Management Plan concurrent with the RM submissions. Each subsequent phase of development will be required to submit details in accordance with Condition 18, which sets out phase specific ecological enhancement and protection plans.
18 (Ecological Protection and Enhancement Plan)	Condition 18 requires the submission of details for the delivery of the approved measures through the Ecological Protection and Enhancement Plan (Condition 17 – see above) to accompany each reserved matters application for each phase.	In accordance with condition 17, tor&co have formally submitted an Ecological Protection and Enhancement Plan alongside each reserved matters application detailing the habitat creation and enhancement measures which will promote protected or otherwise notable

Condition Number	Summary of Wording of Planning Condition	Information Submitted and Compliance with Conditions
		species and enhance the overall biodiversity and ecology of the site.
20 (Layout, Scale, Appearance and Landscaping Details)	Condition 20 requires the layout, scale, appearance and landscaping particulars to be submitted in accordance with Condition 1 for any phase.	In compliance with condition 20, we have submitted the following details: • A comprehensive design and layout for the allotments • The siting, design and external appearance of the buildings accompanied by a schedule of materials and finishes to be used. • Details and design of bus and public transport infrastructure • Details of above-ground infrastructure • A complete arboricultural survey for each of the first three phases • The detailed design of above-ground surface water drainage features, including levels and profiles and a programme of construction in accordance with the approved Design Code.
21 (Landscaping and Layout Particulars)	Condition 21 requires the landscaping and layout particulars to be submitted in accordance with Condition 1 for any phase.	In compliance with condition 20, we have submitted the following details: • Details of all existing trees and hedgerows on the land, showing which are to be retained and which removed; • Details of the positions, height, design, materials and type of boundary treatment to be provided; • Details of any proposed alterations in existing ground levels, and of

Condition Number	Summary of Wording of Planning Condition	Information Submitted and Compliance with Conditions
		the position of any proposed excavation, within the crown spread of any retained tree; • The detailed landscape design for the development including the layout and design of the public realm within the development; • Details of the play areas, public open spaces and new sports pitches, including construction specification • Indicative details of the surfacing, lighting, and signage of all footpaths, cycle routes and equestrian routes; • Details of the measures that will be undertaken to protect the public sewers crossing the site.
22 (Protected Tree Scheme)	Condition 22 requires a scheme for the protection of the retained trees within each phase to be submitted to and approved in writing by ADC prior to the commencement of development or other operations likely to affect trees.	In compliance with Condition 22, indicative tree removal plans for the initial three phases have been submitted as part of the Arboricultural Impact Assessments and Method Statements. These plans will be updated and submitted as part of a future Discharge of Condition application prior to commencement of development of each phase.
25 (Noise Impacts and Mitigation)	Condition 25 requires any reserved matters application to include a scheme setting out details of noise sources and proposed mitigation relevant to that application.	In accordance with condition 25, comprehensive noise surveys have been conducted for phases RM1 and RM4. Reports detailing the identified noise sources and the proposed mitigation strategies have been submitted as part of each application.
26 (Decentralised and Renewable)	Condition 26 requires the details of how at least 10% of the energy supply of the development will be	In accordance with condition 26, detailed reports have been submitted for phases RM1 and

Condition Number	Summary of Wording of Planning Condition	Information Submitted and Compliance with Conditions
or Low Carbon Energy)	secured from decentralised and renewable or low carbon energy sources to be submitted as part of any reserved matters application for each phase.	RM4, outlining how a minimum of 10% of the energy supply for each development will be sourced from decentralised and renewable or low carbon energy sources. The report findings reveal that 88.65% of the predicted energy demand for RM1 and 89.89% for RM4 is met through renewable or low carbon energy generation as required by Policy ECC SP2 (Energy and Climate Change Mitigation).
35 (Odour Impacts)	Condition 35 requires any reserved matters application that includes proposals for high sensitivity receptors within 300m of the Activated Sludge Plant to be supported by appropriate observational evidence to demonstrate there would be no unacceptable odour impacts upon those high sensitivity receptors.	No development is proposed within 300m of the Activated Sludge Plant and is therefore not applicable.

S106 legal agreement

8.4 The requirements of the S106 relevant to this RM application comprise the following.

Schedule No.	Summary of Wording of Obligation	Information Submitted and Compliance with Obligation
Schedule 1 Clause 1.2 (Affordable Housing Scheme)	To submit as part of the Phasing Strategy the Affordable Housing Scheme for the Development for approval in writing by the District Council and not to Commence Development until the Affordable Housing Scheme has been submitted to and approved by the District Council in writing.	Affordable Housing Scheme included as part of Phasing Strategy submitted under standalone discharge of condition 5 application.
Schedule 1 Clause 1.3 (Affordable Housing Parcel Scheme)	Not to commence Development of any Dwellings on a Reserved Matters Area on which Affordable Housing Dwellings and First Homes are to be provided until an Affordable Housing Parcel Scheme for that Reserved Matters Area has been submitted.	Affordable Housing Parcel Scheme to be submitted for discharge prior to commencement.

Schedule No.	Summary of Wording of Obligation	Information Submitted and Compliance with Obligation
Schedule 5 Clause 1.2 (Open Space Scheme)	Not to commence Development on any RMA which contains Open Space until the Open Space Scheme with that RMA has been submitted to and approved in writing by the District Council.	Open Space Scheme to be submitted for discharge prior to commencement.
Schedule 5 Clause 2.2 (Play Areas Scheme)	Not to commence Development on any RMA which is to include a Play Area until a Play Area Scheme with that RMA has been submitted to and approved in writing by the District Council.	Play Areas Scheme to be submitted for discharge prior to commencement.
Schedule 8 Clause 2.2 (Highways Works Scheme)	Not to Commence Development until a Highway Works Scheme has been submitted to and approved in writing by the County Council provided that where a Highway Works Scheme is submitted to the County Council which is not approved a revised Highway Works Scheme shall, within 14 days of receipt of notice in writing from the County Council that the previous Highway Works Scheme is not approved, be submitted to the County Council for approval.	Highways Works Scheme to be submitted for discharge prior to commencement.
Schedule 8 Clause 5.1.1 (Travel Plan)	To submit the Travel Plan for approval to the County Council prior to Commencement of Development.	Detailed Travel Plans included with RM applications for information will be discharged prior to commencement of each phase.

9.0 Conclusions

- 9.1 The principle of development at the site was established by an outline planning permission for 1,500 new homes and access that was granted in July 2023 (ref: F/4/20/OUT). This principle is further supported by Local Plan Policy H SP2c (SP8 – Ford) and the Ford Neighbourhood Plan Policy SA1 (Ford Airfield).
- 9.2 In accordance with Condition 1 of the outline permission, this planning statement supports the submission of the first three reserved matters applications for the site: IRM, RM1 and RM4. These applications provide details of
- Layout
 - Scale
 - Appearance
 - Landscaping
- 9.3 The reserved matters submissions seek to comprehensively address a number of the conditions imposed on the outline permission, as set out in section 9.0 of this statement.
- 9.4 The proposals for IRM, RM1 and RM4 will deliver numerous significant public benefits, including:
- The delivery of 697 x homes – 340 x homes within RM1 and 357 x homes within RM4 – in a sustainable location that will make a significant contribution to the current housing land shortfall in the district, with a commitment to ensuring 30% of these homes being affordable housing. Indicative tenure mixes have been provided in accordance with the approved outline s106 agreement and are detailed as part of the embedded Affordable Housing Statement.
 - A diverse range of house types (including detached, semi-detached, terraced, bungalow and apartment blocks at key marker locations), sizes and tenures.
 - Thoughtfully designed variations in building heights, roof forms, ridge heights, setbacks, building lines and boundary treatments to ensure variation across the site to create a diverse townscape.
 - A landscape-led design prioritising generous high quality open spaces benefitting new and existing residents. These spaces will incorporate biodiverse rich planting schemes, significant new hedgerow and tree planting, formal and informal play areas, recreational trails, plus important connectivity habitats and transport corridors.
 - The provision of a new spine road facilitating safe vehicular from Ford Road at the north of the site and Yapton Road to the south of the site, as well as the promotion of a pedestrian and cycle friendly environment, with the impact of vehicles reduced as far as practicable.
 - Construction of sustainable homes that comply with Future Homes Standards to ensure energy efficiency.

- A network of SuDS attenuation basins and swales to serve the entire development, which form an important part of the landscape and biodiversity of the site.
- Proposals for site-wide biodiversity and green infrastructure enhancements, including a biodiverse and native landscape planting strategy, integrated bee/bird/bat boxes on houses, standalone bird/bat boxes, and insect and hedgehog nesting boxes.
- Economic benefits through construction activities and increased local population
- Support for community facilities and local services and facilities through population growth

9.5 As set out in this statement, the proposals have been designed in accordance with approved Design Code and parameter plans. The reserved matters applications have also undergone thorough consultation with ADC as part of a PPA prior to submission. Furthermore, we have engaged with West Sussex County Council (WSCC) concerning highway and drainage matters and have conducted public engagement events to help inform the design evolution of the site from local residents.

9.6 This statement has comprehensively assessed the compliance of the proposals with national and local policies. It is concluded that the proposals fully comply with both national and local policies. Therefore, we respectfully request that planning permission for the three RM applications be granted promptly, in accordance with paragraph 11d of the NPPF.

APPENDIX I – Affordable Housing Plans