



Planning Statement

Land to the rear of Paynters Croft and Meadow Cottage, Burndell Road,
Yapton, BN18 0HR.

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March 2021



Planning statement in respect of the development of land to the rear of Paynters Croft and Meadow Cottage, Burndell Road, Yapton, BN18 0HR to provide 23 houses on behalf of Driftstone Homes Limited.

The following note seeks to set out the rationale for the development of land to the rear of Paynters Croft and Meadow Cottage, Burndell Lane, Yapton to provide some 23 new dwellings, comprising a mixture of private and affordable houses in a mixture of semi-detached and detached houses.

This scheme has been subject to a previous pre-application submission. This statement and the submitted plans therefore seek, in part, to respond to comments previously made by the LPA in regard to this site. The previous submission sought the LPAs views on some 30 dwellings – the current scheme therefore seeks to reduce the number of dwellings on site by seven.

The site comprises part of the rear garden and paddocks of two dwellings, Paynters Croft and Meadow Cottage. The development site is located immediately to the south and adjacent to the established settlement of Yapton.

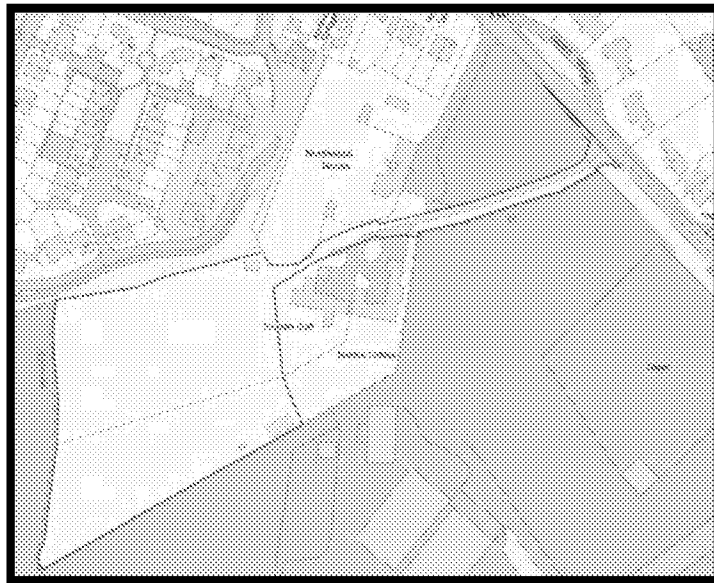
As such it is noted that the site is subject to countryside policy and thus the principle the development of the site for residential purposes is not acceptable. However, it is argued that the site is well contained and located in a sustainable location with decent pedestrian links to local services and amenities. In absence of an adequate five-year housing land supply position (3.3 years as of December 2020) it will be argued that the development should be brought forward for residential development and is therefore consistent with the NPPF and current LPA advice.

The following documents are submitted with the application:

- Site location plan
- Site plan
- Block plan
- Floor plans and elevations
- Biodiversity Survey and Report
- Flood Risk Assessment
- Foul and Surface Water Drainage Statement
- Landscaping Strategy
- Bin Storage and Collection Provision
- Parking Plan
- Street Scene
- Schedule of accommodation
- Sub-station enclosure details
- Transport Statement
- Tree Survey and Arboricultural Report

Site and surrounding area

The development site comprises part of the rear gardens and paddock of Meadow Cottage and Paynters Croft. The site area of the development site is some 1.29 hectares. The site is identified in the following extract:



The development site is located to the south west of Burndell Road, Yapton. There is an existing, private, driveway that serves the large detached properties of Meadow Cottage, Northwood House and Northwood House. The access road is currently some 3.1m wide. Whilst it is recognised that this does not allow two cars to pass each other, there is sufficient space each side of this access road, under the control of the developer to widen the accessway to a minimum of 4.8m, with an additional minimum 1.5m pathway. An access meeting LPA minimum will therefore be provided on site.



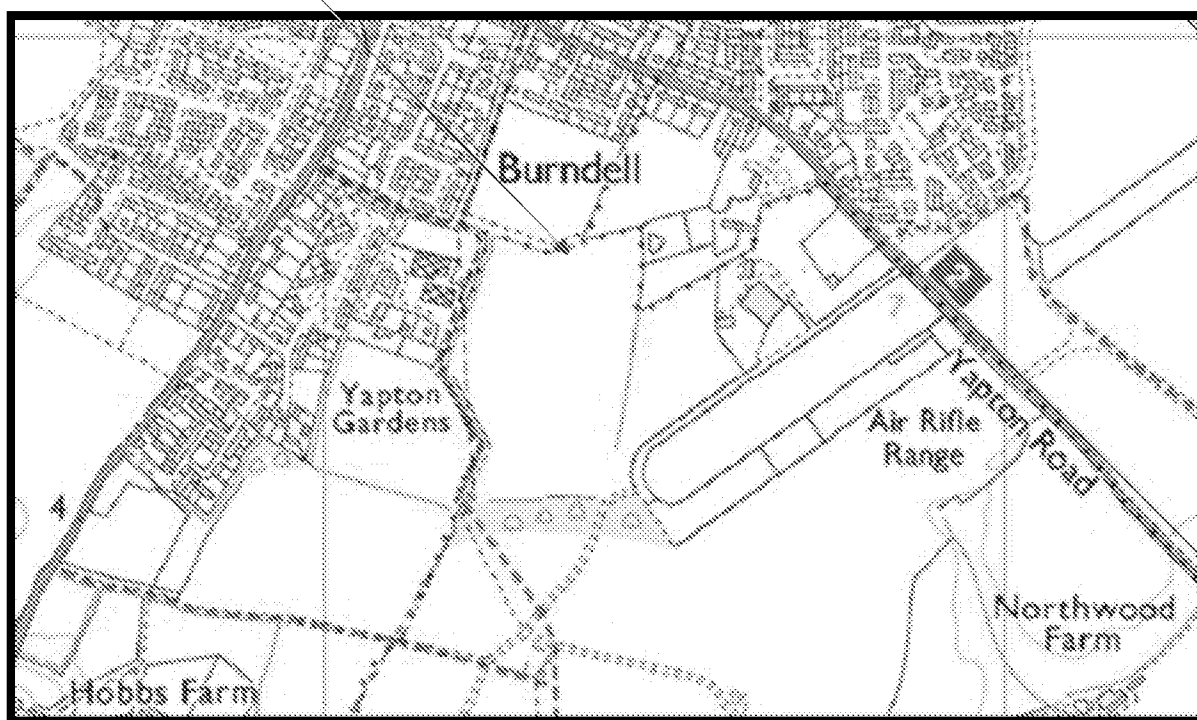
Photo 1 – view of site access

The development site comprises an open area of land, roughly rectangular in shape with only peripheral trees. The site is relatively flat and well screened by mature hedgerows.

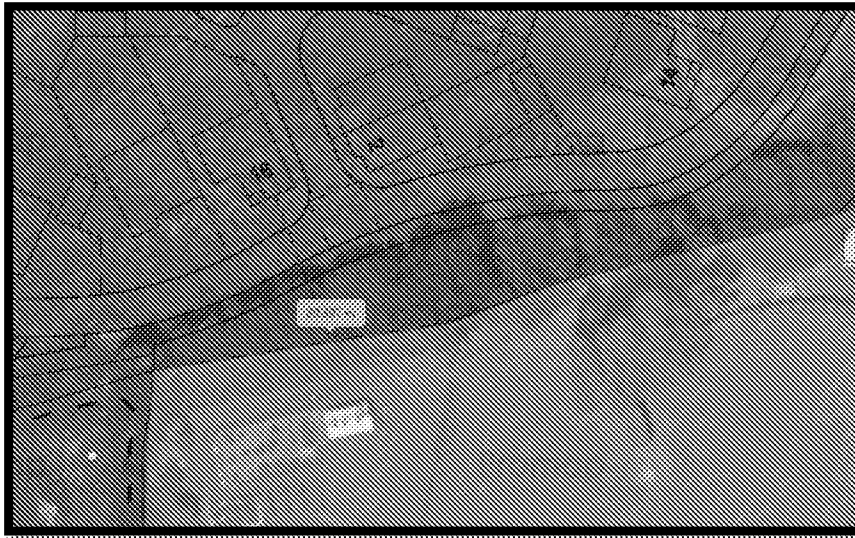


Photo 2 – view of development site

To the immediate north of the site there is a recent development site, comprising 45 new dwellings (Abbotsfield). This residential development comes to the development site boundary as illustrated in the following extract.



The neighbouring houses as part of Abbotsfield are in effect contained by its access road. Thus, houses are separated from the application site by the road and intervening open space. There are 2-3 houses facing the application site and habitable room windows are some 20m from the application site. In addition, there is a strong tree belt on intervening land.



The site is set well away from the public domain. It is some 180m from Burndell Road. The nearest public right of way is some 250m to its west.

Yapton comprises a large village with some 6,000 residents. It has range of local amenities to include retail stores, a primary school, pharmacy and doctor's surgery, a recreation ground and a village hall.

The development site is well located in relation to the local community and facilities. Burndell Road has a decent pavement with street lighting and thus a good pedestrian links to the village centre. The application site is therefore sustainably located.



Yapton also has good bus links with the wider area to include a convenient link to Bognor Regis.

Planning policy

Section 38(6) of the Planning and Compulsory Purchases Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

The revised National Planning Policy Framework was published in June 2019. Paras 7 and 8 refer to the principles of sustainable development, as follows:

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 11d of the NPPF refers to a presumption of sustainable development, as follows:

For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

Paragraph 38 seeks to

38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Paragraph 68 refers to the importance of small and medium size sites in helping meet on-going housing need.

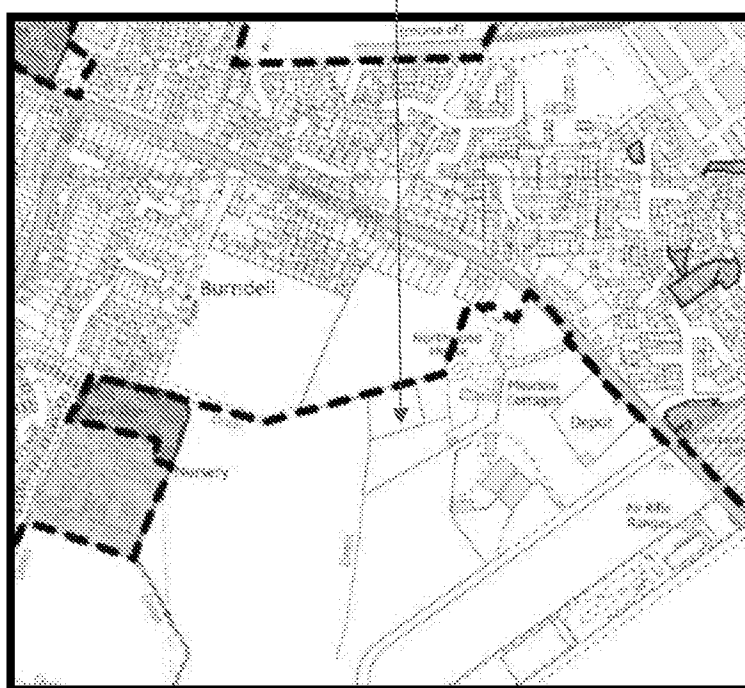
68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.*

Reference is drawn to the National Minimum Space Standards, as per the following:

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

The site is identified as being located just outside the settlement boundary of Yapton as defined in Policy Map 2 of the Adopted Arun Local Plan 2018.



The site is located to the south of the settlement boundary as defined in the local plan. It is clear from site visits that a residential scheme is currently being built within and up to the settlement boundary. The development site is therefore located immediately adjacent to existing housing.

Policy HDM1 of the local plan seeks to ensure that for schemes of 11 dwellings or more that a balanced mix of market and affordable housing and dwelling sizes is provided.

Policy AHSP2 seeks to provide a minimum of 30% affordable housing is provided on sites of 11 dwellings or more.

The LPA cannot demonstrate a five-year housing supply, which has most recently been defined as at 3.3 years. This is as set out in the *Authority Monitoring report 1st April 2019 – 31st March 2020*.

In addition, the Govt released the Housing Delivery Test (HDT) on 19th January 2021. The result for the LPA is 61% with the consequence that there is a presumption in favour of sustainable development in accordance with the provisions of the NPPF.

The LPA was previously required to publish an Action Plan, that sought to analyse the barriers to delivery and measures to overcome them to make sure that an adequate supply of houses is achieved.

The Arun District Council Housing Delivery Test – Action Plan was published in June 2019. The essential points that come out of the Action Plan are as follows:

- The local plan sets out a requirement of 20,000 dwellings over the 20-year plan period – thus an average of 1,000 dpa. However, this comprises a stepped housing land supply trajectory.
- At that time the 5-year housing land supply position is 4.7 (now 3.3) years.
- Housing supply may not be sustained over the plan period against the stepped trajectory in the plan period.
- Developers are not fulfilling trajectory delivery rates
- Constraints on development include significant infrastructure delivery constraints, an unwillingness in some instances to comply with Masterplan requirements, poor-quality planning applications, applications being overturned by members contrary to officer recommendation and market saturation and delivery issues.

Para 6.2 of the Action Plan refers to potential barriers to housing delivery, which include the following:

- Fragmented ownership/control
- Legal rights of way and ransom strips.
- Infrastructure and lead times

Section 7 of the Action Plan sets out proposed delivery actions in order to boost housing delivery, to include the following:

- To improve the quality of housing schemes to include the use of pre-application discussions.
- The application of para 11d of the NPPF, namely that there is a presumption in favour of sustainable development until a 5-year housing land supply position is achieved.
- Seek the allocation of smaller sites diversify the developer base.

Reference is drawn to *Parking Standards Supplementary Planning Document, January 2020*, which sets out car parking standards for new development, to include the following:

Electric charging point requirements include 100% provision for houses with a garage, as per the following extract:

Table 2.2 – Electric Vehicle Charging Points Minimum Requirements		
Year	% of Parking Spaces with Active EV Charging Points	% of Parking Spaces with Active EV Charging Points
	Houses with a driveway and garage	All other developments
2018	100	20
2023	100	30
2028	100	50
2033	100	100

Adequate visitor parking should be provided.

Garages should be a minimum size of 6 x 3m and if fully enclosed comprise 0.5 car parking space.

Cycle provision should be provided in accordance with the following:

Table 2.3: Recommended levels of cycle provision.		
Type	Dwelling Size	Cycle Provision (per unit)
Houses	Up to 4 rooms (1 & 2 bed)	1 space
Houses	5+ rooms (3+ bed)	2 spaces
Flats	Up to 3 rooms (1 & 2 bed)	1 space (if communal storage otherwise same as 1 & 2 bed house)
Flats	4+ rooms (3+ bed)	1 space

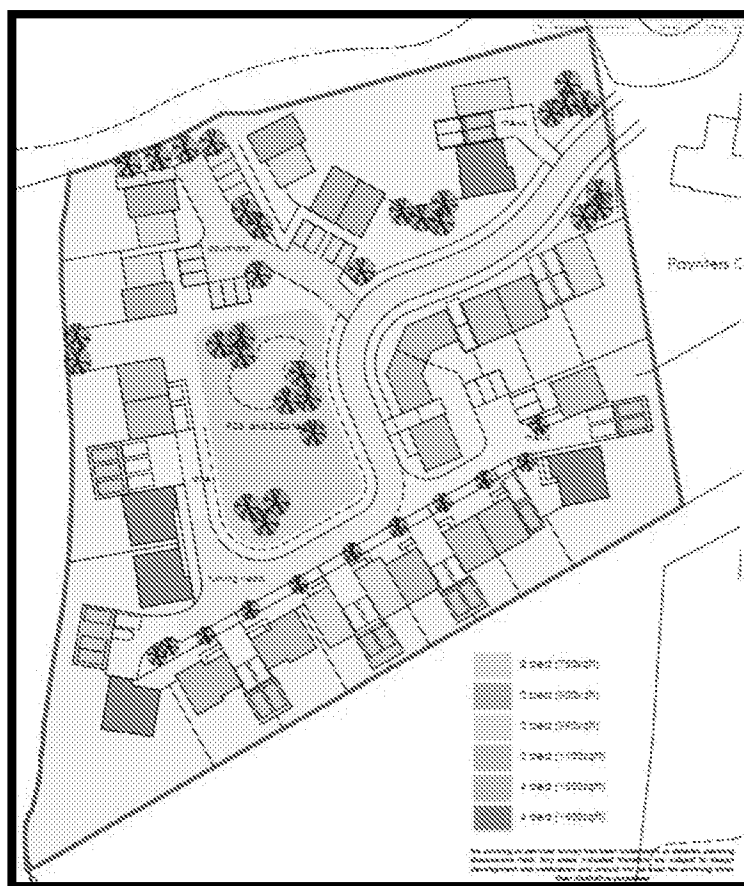
Car parking should be provided in accordance the following:

Table 3.1 – Expected level of provision for new residential developments

Number of bedrooms	Number of habitable rooms	Parking Behaviour Zone		
		1	2	4
1	1 to 3	2	2	1
2	4	2	2	1
3	5 to 6	2	2	2
4+	7 or more	3	3	2

Previous pre-app submission and LPA response

The previous scheme comprised some 30 dwellings as per the following extract:



The layout of the scheme sought to provide some 30 detached and semi-detached houses located around the periphery of the site facing towards an area of public open space at the centre of the site. The majority of houses had car parking provision within the curtilage – with the exception of seven homes in the north-west corner of the site that had courtyard parking and all have back gardens. The LPA response to the scheme was as follows:

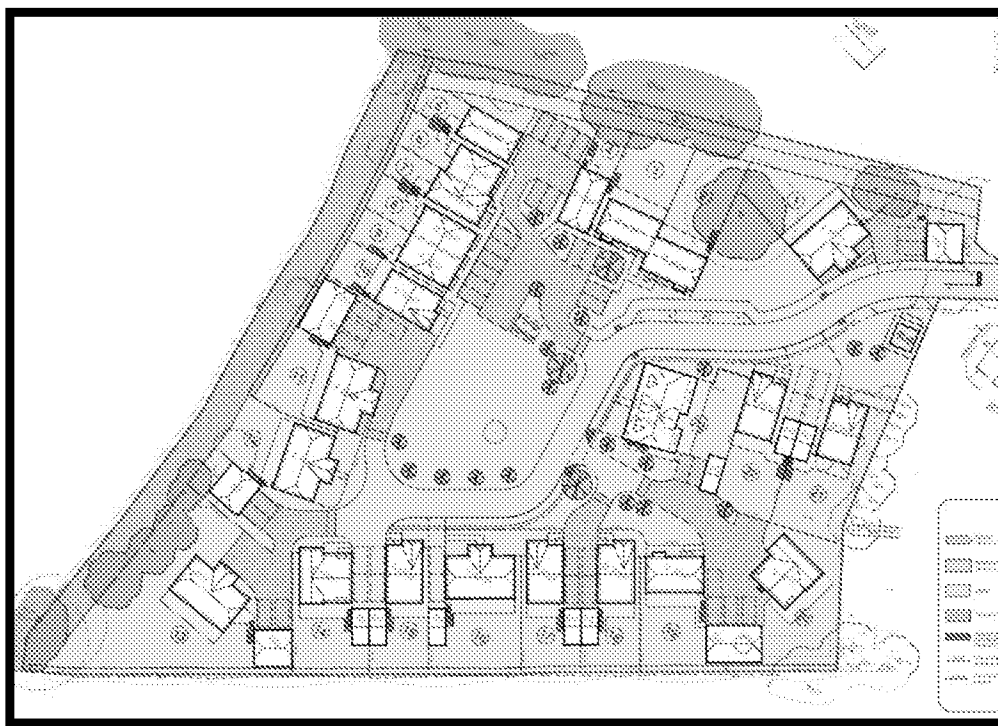
- Principle – the LPA acknowledge that policy SD SP1 of the Local Plan takes a positive approach to sustainable development. The development proposals fail to meet the Environmental requirements of the NPPF in that it will change the character of the site from rural to urban. The proposals meet the Social and Economic aspects of para 8 of the NPPF.
- Design – concerns were raised with regard to the urbanising impact of the development. The density of development at 23 dwellings per hectare is higher than an adjacent development at 19 dph.
- Neighbour Amenity neighbouring residential amenities should be protected.
- Amenity Space Provision – minimum 10.5m rear gardens should be provided.
- Bin Storage – adequate bin storage should be provided.
- Affordable Housing – should be provided at 30%
- Highways, Transport and Parking – adequate car parking and cycle provision should be made. The existing access is 3.1m wide and can be widened to allow for passing spaces.
- Sustainability - new building should be built to energy efficient standards
- Flooding/Drainage – drainage details should be provided
- Protected Trees – an application should be supported by arboricultural assessment.
- Open Space Provision – space provision as per the submitted plans is acceptable.
- Light Pollution – a lighting scheme is required to minimise the impact of lighting on the night sky.
- Biodiversity – appropriate ecological surveys are required
- Crime – consideration should be given to the design of the buildings and their surroundings.
- Landscaping – on site public open space should be provided along with details of SuDS. Additional planting is required as part of a landscaping scheme.

Should an application be submitted the following documents are required:

- Affordable Housing Statement/Agreement
- Biodiversity Survey and Report
- Flood Risk Assessment
- Foul and Surface Water Drainage Statement
- Landscaping Strategy
- Lighting Assessment
- Bin Storage and Collection Provision
- Parking Plan
- Street Scene
- Transport Statement
- Tree Survey and Arboricultural Report

Development proposals

In consideration of the points made by the LPA in their response to the initial scheme the developers are looking to provide an alternative scheme as per the following extract:



The proposals seek to pursue the design concept of the initial submission by providing detached and semi-detached houses on the periphery of the site facing a central amenity area.

The scheme has been reduced by 6 dwellings. The site area is some 1.29 hectares in size and as such the density of development is now some 17.8 dwellings per hectare (previously 23 dph) and lower than the adjacent housing site which the LPA identify as 19dph. This density is comparable to neighbouring sites.

The housing mix is as follows:

- 2 bedroom – 2
- 3 bedroom – 13
- 4 bedroom – 8

Six dwellings are provided as affordable housing – policy requirements are to provide 30% provision. This would equate to 6.9 dwellings. The scheme seeks to provide 6 dwellings on site with an anticipated requirement to make a financial contribution in respect of the shortfall.

The plans include floor areas which demonstrate compliance with the National Minimum Space Standards.

Rear garden sizes are a minimum of 10.5m deep, meeting policy requirements in this regard.

Car parking provision is also made in accordance with prevailing car parking standards, as per the following:

- Electric charging points will be provided to each dwelling
- Cycle provision at a minimum of 1 space per dwelling is to be provided in the form of secure sheds to the rear of each property.
- Each house has adequate car parking – 2 spaces for the 2-3 bed dwellings and 3 spaces for the 4 bed dwellings. Garages are assumed to provide 0.5 car parking space for the purposes of this calculation.
- Where garages are provided they have internal dimensions of 6m x 3m.

The proposals show an area of public open space of some 1,891sq-m in size.

It is noted that there are houses to the north of the application site that face the application site and that there is a minimum 20m distance from these properties to the site boundary. Plots 1-5 are provided in the northern element of the application site. Plots 1-4 have north facing rear windows whereas plot 5 has a flank wall, with no windows. The minimum separation distance between properties is well in excess of 30m. There is also significant intervening vegetation and thus there is no opportunity for overlooking between properties or for other harm to residential amenities.

The application is supported by a variety of consultant reports, which demonstrate the following:

- Trees – where possible trees will be retained. The application is supported by a landscape strategy which seeks to ensure that replacement planting is provided.
- Highways – improvements are to be made to the access road so that vehicles can pass each other and that a safe environment is provided for pedestrians in the form of pathways of a minimum of 1.5m along the side of the pathway.
- Landscape and Visual Impact Assessment – clearly demonstrates that the proposals will not adversely impact on the character of the local countryside.
- Floodrisk and drainage assessment – addressing issues with regard to flooding and rainwater run-off and sewage discharge.
- Ecology – focussing on off-site reptile mitigation and protecting on-site bat habitats.

Community involvement

The applicants have contacted both local residents and Members to inform them of the development proposals and to engage with them in order to make appropriate improvements to the scheme if possible. Community engagement took the form of a letter with site with contact details. The consultation process began in January 2021.

The following map extract shows the extent of the local consultation process. In addition, the three ward members were consulted:



To date three responses have been received to include the following comments:

- Clarification was sought with regard to boundary treatment and the retention of hedgerows and trees on all boundaries but with an emphasis on the northern boundary. In response the boundary hedgerows and trees are to be retained where possible.
- Have ecology surveys been undertaken – these are provided with the application.
- When will works start and what are the hours of operation – commencement dates are clearly dependent on any date for approval. Hours of operation will be controlled by condition.
- Is it possible to incorporate single storey dwellings on site (so as to be suitable to older residents who may have issues climbing stairs) – unit 23 have been altered to comprise a chalet bungalow. Whilst this means that there will be stairs there is the opportunity to have a ground floor bedroom.

Planning balance

It is clear that, due to the ongoing failure of the failure to deliver sufficient housing over recent years as identified in the fact that the Housing Supply Figures at 3.3 years and by the measure of the housing delivery test which sets out an explicit presumption in favour of sustainable development.

In addition, the LPA has made a commitment (in the Action Plan) towards bringing forward housing sites that comply with paragraph 11d of the NPPF.

Consent should therefore be forthcoming on this basis unless the harm created by the development demonstrable outweighs the benefits.

In this instance it is clear that the site is located in a sustainable location. Considerable development has recently taken place in Yapton and there are a number of local facilities and amenities within close walking distance of the development site. Local bus routes provide access to neighbouring settlements, including Bognor Regis, thus providing convenient access to local retail, employment and cultural facilities without reliance on the motor car.

The proposals can therefore be regarded as sustainable development and meeting the overarching objectives of paras 7 and 8 of the NPPF, for the following reasons:

- Economic – the proposals look to provide new housing on the edge of the existing settlement boundary. This means that new housing will be located in close proximity to local amenities and services and in an appropriate place for new housing. In addition, the proposed development is sensitively located and will be read as part of the existing settlement and access local facilities and amenities, thus supporting local businesses.
- Social – the proposals will provide much needed housing on the edge of an existing settlement. Residents will readily have access to a range of local amenities thus supporting and boosting local community resources.
- Environmental – the proposals amount to an effective use of land.

In addition, it is noted that the development proposals amount to the development of small and medium size sites. At some 23 dwellings the development proposals squarely fall within the definition of such sites. Whilst the benefit of developing much larger sites is recognised – partly in terms of long-term housing and infrastructure delivery it is clear that they are associated with prolonged delays in achieving consent (the Nathaniel Lichfield report *Start to Finish - How Quickly do Large-Scale Housing Sites Deliver? November 2016* suggests an average period of 5 years for large sites to achieve consent) and the delivery of housing (the Sir Oliver Letwin *Independent Review of Build Out - Final Report* suggests large sites of 1,500 dwellings or more take an average of 15.5 years to be completed).

Thus, to bring this site forward would comply with para 68 of the NPPF, which encourages the delivery of smaller sites which can be built out relatively quickly and therefore make an important contribution towards immediate housing supply issues.

To bring forward a smaller site will also help overcome barriers to housing delivery as identified within the LPA Action Plan, which identifies issues of fragmented ownership, ransom strips, non-compliance with masterplan objectives and poor design.

In this instance the developer will be Driftstone Homes, who are a well-established residential developer, based in Littlehampton. As a relatively small developer they are, in effect, required to develop high quality value housing to as to compete with the larger housebuilders. Thus, the proposals will be high quality. Whilst the proposals only show, at this stage, a site plan further information can be provided in respect of alternative sites that they have. In addition, the site plan indicates a high-quality scheme that provides a generous area of public open space as a focal point for the proposed scheme, a wide range of housing types with generous gardens and to include a policy compliant affordable housing provision.

As such the proposals provide much needed housing in a sustainable location and should be supported.

The proposals are policy compliant and the applicant has made positive efforts to address concerns raised by the LPA in the pre-app response. This has included the reduction in housing numbers so that a comparable housing density to the adjacent area is provided.

In addition, it is clear that the development proposals will not harm the local area. The application is supported by a Landscape Visual Impact Assessment which concludes that the proposals will have minimal impact on the wider area.