

CPRE Sussex submits that this application for outline permission only should be refused, not only because the development it proposes fails to satisfy a number of local and national planning policy requirements, but because by reserving for subsequent approval all matters other than access it excludes from current consideration such key aspects of the proposed development as housing unit “mix” which should arguably be included in a full application.

Development of the kind proposed by the applicant would not normally be permitted as the application site lies wholly outside the Yapton-Ford settlement boundary and is therefore classed as countryside within the scope of Arun Local Plan “saved” Policies GEN2 and GEN3. The applicant however argues (Planning Statement # 8.1) that its proposed development should nonetheless be permitted as these locally-decided planning policies should now be regarded as “out-of-date” because, contrary to the National Planning Policy Framework (para. 49), the Authority cannot demonstrate that it has a five-year (plus 5%) supply of deliverable housing sites, sufficient to meet either the housebuilding rate demanded by the now-revoked South East Plan or the Authority’s indicative requirement of 580 new units a year. In seeking to show that Arun lacks the required housing land supply, the applicant cites under-performance in the District’s housebuilding rates for previous years (Statement # 7.5), but this ignores the fact that the market-housing completion rate is independent of land supply and relies on market conditions – recently highly adverse - that govern the rate at which housebuilders bring forward sites for development. The applicant also appears to ignore the fact that in support of its indicative housebuilding requirement the Council has made significant “strategic” housing land allocations in its pre-submission draft local plan, which is now considered a material consideration in assessing planning applications, and from which the Council’s housebuilding requirement cannot be considered in isolation by the applicant.

With regard to the applicant’s contention that its proposals constitute “sustainable development” which, in the absence of an “up-to-date” Local Plan, should therefore be approved in accordance with NPPF para.14, it may be asked how an admitted housing density of only 19 d.p.ha. (Statement # 4.4) can constitute an efficient use of the land affected and therefore be consistent with NPPF sustainability principles (for example that the loss of high-grade agricultural land - as here - should be minimised: para. 112). The proposed development is thus also inconsistent with Arun Local Plan “saved” Policy GEN7(i), which stipulates a density of a least 30 dwellings per hectare in any new residential development and, by specifying over a hundred parking spaces for just 45 houses, also inconsistent with Policy GEN12 which seeks to restrict private car-parking provision within new residential development where (as here) public transport is available nearby. Neither does the outline application contain any binding figure as to what proportion of the new homes would constitute “affordable” (social-rented/low-cost market) housing, as is required on all sites above 0.8 ha. by Policy DEV17, when it is precisely this type of housing for which there is the greatest need within the District.

In its objection to this outline application, Yapton Parish Council has moreover stated that drainage and sewerage facilities in the area are currently inadequate to accommodate further development (so that the application is contrary Arun Policy GEN9), that the site floods when excessive rainfall occurs (so that it is contrary to Policy GEN11), and that with recent development proposals Y/81/10 and Y/30/13 already bringing over 200 new homes in close proximity there will be a significant increase in road traffic joining the B2233 Yapton

Road within a 280-yard length (contrary to Policy GEN7(vii)). The Parish Council further observe that the land affected, which straddles the Ford and Yapton Parish boundary, has not been included as a potential development site in the emerging Ford Neighbourhood Plan, nor has it been selected by the Yapton local community for development in the submission version of the Yapton Neighbourhood Plan for the portion on the Yapton side of the parish boundary. It should be noted that in a recently “recovered” appeal concerning 111 new homes outside the settlement boundary of one Leicestershire village, the Secretary of State for Communities and Local Government ruled that, in view of the NPPF’s recognition that neighbourhood plans should be able to shape and direct sustainable development (para. 185), the district council’s lack of a 5-year housing land supply was insufficient reason to over-rule the village neighbourhood plan by allowing the developer’s appeal. (The Yapton Neighbourhood Plan has we understand been endorsed by Yapton Parish Council and submitted to Arun District Council for the mandatory 6-week publicity period prior to independent examination so that there is therefore a strong likelihood that it will have been adopted by the time any appeal against refusal of this application is heard).

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