

# **MADDOX PLANNING PLANNING STATEMENT**

# Pagham ACRP

## 24/10/2024

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### Description of development

Erection of an Ambulance Community Response Post

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### Type of application

Full planning application

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### Applicant

South East Coast Ambulance Service NHS Foundation Trust (SECAmb)

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### List of supporting documents

Drawings numbered 524/022/01, 524/022/098/A, 524/022/99

### Development plan

The adopted development plan comprises:

1. Arun Local Plan 2018

The emerging development plan comprises:

1. Arun Local Plan Update 2023-2041 - currently consulting on Issues and Options- at an early stage of progress, therefore little weight can be attributed to the emerging plan.

### Policies map

The following designations on the policies map are particularly relevant:

1. Within the Built up Area Boundary
  2. Part of Allocated Strategic Housing Site SD2 (Pagham North)
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### Planning policies

The following adopted and emerging planning policies are particularly relevant:

Policy number	Policy title	Referred to in paragraph number of this statement
<b>Arun Local Plan 2018</b>		
HSP2	Strategic Site Allocations	
HSP2A	Greater Bognor Regis Urban Area	
HWB SP1	Health and Wellbeing	
DDM1	Aspects of form and design quality	
DSP1	Design	
QESP1	Quality of the Environment	
TSP1	Transport and Development	

In this Statement, the Applicant gives full weight to policies contained in the development plan but, in accordance with section 38(5) of the Planning and Compulsory Purchase Act 2004, if a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved, or published.

## Other material considerations

Other material considerations (such as national planning policy and supplementary planning documents, area action plans and design briefs) include:

1. Arun District Council Parking Standards Supplementary Planning Document adopted in January 2020
2. NPPF (National Planning Policy Framework)
3. PPG (Planning Practice Guidance)

## Relevant planning decisions

Reference/address	Description	Status/decision date	Referred to in paragraph number of this statement
P/134/16/OUT	Outline application for the development of up to 280 dwellings (including affordable homes), land for a replacement scout hut, land for an Ambulance Community Response Post Facility and land for either a 1FE primary school or care home. Provision of a primary vehicular access from Sefton Road and demolition of No. 80 Rose Green Road and creation of a pedestrian and	Granted 10.10.19.	

	emergency only access. Provision of Public Open Spaces including associated children's play areas, landscaping, drainage and earthworks.		
P/49/21/RES	Application for the approval of Reserved Matters pursuant to condition 1 (Reserved Matters details), condition 6 (Design Code Masterplan) & condition 7 (landscaping & layout details) following the grant of P/134/16/OUT for the erection of 250 No. dwellings, (including affordable homes), replacement scout hut, land for an Ambulance Community Response Post Facility, demolition of No. 80 Rose Green Road & provision of Public Open Spaces including associated children's play areas, landscaping, drainage & earthworks (resubmission following P/24/20/RES).	Details approved 28.10.21.	

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## Contents of this statement

1. Site and area description
2. Pre-application engagement
3. Proposed development
4. Considerations
5. Conclusions

## Appendices

1. Pre application engagement details

## Main benefits of the scheme

The proposed development provides an opportunity to improve the effectiveness and efficiency of the ambulance emergency service as part of the rolling out of the Make Ready Strategy. The development is proposed in accordance with the planning permissions (Outline and Reserved Matters) for the strategic housing site (SD2) which make provision for the ambulance facility. The proposal will improve the health and social conditions of the area and it is in overall accordance with the development plan policies.

## **1.0 Site and area description**

- 1.1 The site address is the identified Ambulance Community Response Post on land north of Sefter Road and 80 Rose Green Road Pagham. The site area is 0.02 ha.
- 1.2 The site is part of the wider allocated strategic housing site (of 13.84 ha) currently being developed, which has planning permission for the erection of 250 dwellings and associated infrastructure, including a scout hut, the Ambulance Community Response Post (ACRP- the subject of this application), public open spaces, landscaping, drainage and earthworks.
- 1.3 The application site is located to the western side of the site, close to the western site boundary. To the south of the site is the location of a scout hut, to be provided as part of the strategic development. The application site is accessed directly from the western spine road close to the main vehicular access to the wider development site off Sefter Road.

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## **2.0 Pre-application engagement**

- 2.1 Before submitting the planning application, a pre application advice meeting was arranged. The meeting was held with Jessica Riches, and was followed up with a letter dated 04.10.23 detailing the advice. Details of the pre application engagement are set out at Appendix 1 to this statement.
- 2.2 In summary, the initial advice received was that based on the design of the structure, an application would be likely to be refused permission as the building would appear incongruous and out of character with the site and surrounding development. Consideration should be given to a more sensitive materials palette or design which better reflects the residential character of the site.
- 2.3 In addition, consideration should be given to screening the building to mitigate its visual impact.
- 2.4 Following on from this advice, the building was redesigned, and by exchange of email, the case officer confirmed that the revised design was acceptable and could be supported. Additional landscaping is also proposed in the submitted scheme.

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### **3.0 Proposed development**

- 3.1 The proposed description of development is for the erection of a building and the use of the site as an Ambulance Community Response Post (ACRP)
- 3.2 The site is currently undeveloped, and the new building will have a floor area of 30.6 sqm. The building will contain a rest area, storage/cleaners room and a toilet.

#### **Layout**

- 3.3 The building will be located to the northern end of the application site. In front of the building will be space for the parking of up to two ambulances or other emergency vehicles.

#### **Scale and massing**

- 3.4 The building will be single storey in form and scale. The building will have a pitched and ridged roof, with a shallow pitch and a maximum height of 3.7m to the ridge and 2.3m to the eaves.

#### **External appearance**

- 3.5 Following discussion with the case officer at the pre application stage, it is proposed to use black stained timber effect horizontal cladding to the external faces of the building above a 0.6m high brick plinth.

#### **Landscaping**

- 3.6 As part of the development of the wider allocated site, the approved Reserved Matters include a comprehensive landscaping strategy. The approved landscaping scheme for area adjacent to the site shows a grassed verge alongside the spine road and two Tilia Cordata “Green Spire” trees in the verge to the north of the access onto the ACRP site. These trees will screen the building and the site from views along the highway. The Scout hut site to the south of the application site shows the boundary to the highway being planted with Hebe Marjorie shrubs. In order to allow for consistency and a unified approach, it is proposed to plant Hebe Marjorie around the site boundary to soften the edge of the site, and to plant a Tilia Cordata tree to the south of the access onto the ACRP site to further mitigate the impact of the built form. However, this will need to be planted within the site and not in the verge in order that it remains within the red line area of the application site and can be secured by condition.

#### **Access and parking**

- 3.7 The nature of the ACRP use (described in more detail below) is such that it is a place for ambulance and emergency vehicle crews to go to when not on emergency calls and for rest breaks. As a result, there will not be a crew permanently based at the site. Parking will be required for the emergency vehicles whilst the crews are utilizing the building. It is proposed to provide space for up to two vehicles to use the site at any one time.

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## 4.0 Considerations

- 4.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws on the application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of the development;
- The impact on the character and appearance of the area;
- The impact on the amenities of the occupiers of adjoining residential properties;
- Access and parking arrangements.

### Principle of the development

- 4.2 According to the adopted development plan, the site is part of the wider strategic allocated site (SD2- North Pagham), and within the Built up Boundary of Bognor Regis. As a result of the site being within the settlement boundary, it should be considered acceptable in principle, as it is the Council's strategic strategy to ensure that Bognor Regis is one of the two main service, employment, retail and social centres. The proposed development supports this strategic approach.
- 4.3 In addition, the allocated strategic site SD2 (Pagham North) allocates the wider site for the delivery of 800 dwellings. The policy also requires the delivery of additional infrastructure, including land for an Ambulance Community Response Post (ACRP). This land was secured through being included within the s106 agreement that was signed prior to planning permission being granted.
- 4.4 The ACRP is part of the Make Ready Strategy being rolled out across the SECamb region in order to make the provision of the ambulance service more effective and efficient. A number of new Make Ready Centres (MRCs) have been developed in Kent, Surrey and Sussex. The premise of the strategy, in summary, is that many of the existing historic ambulance stations operated by SECamb are now poorly located, impeding response times to patients and with a subsequent impact for clinical outcomes. The aim is to replace these stations with strategically sited MRCs. The development of the MRC strategy significantly minimises the risk of cross infection and improves patient safety. At shift changes, which are principally scheduled outside the times of peak demand, vehicles which have been made ready at an MRC will be taken by a new shift team to their Ambulance Community Response Post (ACRP). ACRPs are much smaller (generally 30 – 50 sqm) than an ambulance station and provide community-based welfare facilities to avoid crews having to return to the MRC for statutory meal breaks etc. Crews will attend the closest ACRP to their location as required.
- 4.5 Where possible and practical, the use of existing Ambulance Stations have been considered for redevelopment as MRC or ACRP sites (such as at Banstead in Surrey). However, this is not always possible and strategic locations are required with good access to the road network in order to ensure that emergency vehicles can be mobilized when necessary quickly and efficiently and to allow crews to take proper statutory rest and welfare breaks. Policy HWB SP1 sets out that all development should be designed to maximise the impact it can have to promoting healthy communities and reducing health inequalities. The MRC strategy is in line with this policy requirement, and the development of the ACRP site will support this strategy.
- 4.6 As a result, it is clear that the principle of development should be considered acceptable as it is in accordance with the strategic policies of the development plan.

### Impact on the character and appearance of the area

- 4.7 Development plan policies DDM1, DSP1, and QESP1 refer to the requirement for development to reflect the characteristics of the site and the local area in their design, layout, scale, character and architectural details.



Aspects of character, appearance, public realm, scale and form and design are required to be considered (amongst other matters) by policy DDM1.

- 4.8 Policy QE SP1 requires all development to contribute positively to the quality of the environment and does not have a negative impact upon residential amenity.
- 4.9 The original pre application advice plans were presented to the case officer on the basis that the building was a “Portacabin” type structure. However, the advice received was that the proposed building should be better designed and of a higher quality in order to avoid a harmful impact on the character and appearance of the area. As a result, the building has been redesigned to have the appearance of a timber clad “cabin”, with a pitched roof and materials that will be suitable in the context of the development of the wider site. Additional landscaping has been proposed to the periphery of the site in order to soften the visual impact and enhance the character of the area.
- 4.10 The application site is close to the vehicular access to the development and immediately to the west of the highway. As such, the site is in a relatively visible location and will be seen by users of the highway. However, the relatively limited scale of the structure (being 9m in width and 3.4m in depth) with a maximum height to the ridge of 3.7m means that it will not be a prominent feature in the streetscene, and the additional planting proposed will mitigate the visual impact further. The use of materials will ensure that the building has a high quality appearance and reflects the appearance of the Scout hut, the approved details of which are shown below;



- 4.11 The revised design of the building, compared to the original pre application advice submission, together with the siting, layout, additional landscaping, scale, form and materials used will mean that the proposed development is of a high quality, reflective of the other adjoining community use building to the south, and not in conflict with the policies of the development plan in relation to the impact on the character and appearance of the area.

#### Impact on the amenities of the occupiers of adjoining residential properties

- 4.12 Policy QESP1 requires developments to not have a significantly negative impact on residential amenity, and policy DDM1 sets out that development should have a minimal impact to users and occupiers of nearby properties and land. In this case, as a result of the development of the strategic site allocation, the predominant land use to the east will be residential, to the south is the proposed scout hut, and to the west and north is open countryside and woodland.
- 4.13 The building is of a scale and size, and of sufficient distance from the residential properties to the west to not have any impact in terms of loss of light, sunlight, privacy, and outlook. The building and its use will not have a negative impact on the Scout hut use to the south, nor on the character of the open countryside and woodland to the west and north.
- 4.14 Whilst there will some traffic movements associated with the proposed use, with emergency vehicles entering and leaving the site on a sporadic basis, given the access from the application site is to the main vehicular route through the site, it is submitted that there will be no additional harmful impact caused by

traffic generation. As a result, the proposed development complies with the development plan policies in this regard.

#### Access and parking arrangements

- 4.15 Policy T SP1 is a strategic transport policy, but includes the requirement that development will incorporate appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the adopted Arun District Council Parking Standards Supplementary Planning Document adopted in January 2020. Development must also give safe access to the highway network.
- 4.16 As the access to the site was considered in relation to the determination of the outline planning application (P/134/16/OUT) and the subsequent Reserved Matters application (P/49/21/RES), it is considered that the access from the site onto the spine road of the development being built out and onto Sefter Road is suitable and adequate, and will not result in any increased danger or inconvenience to other highway users.
- 4.17 In relation to car parking, the proposed use is a sui generis (in a use class of its own) use, and its operation and management is unique to the ambulance service. The site is designed for crews to take appropriate and statutory rest breaks between being on emergency calls. As a result, the use of the building is likely to be temporary and intermittent as various crews use the facility at various times of the day and night. The main objective of the management of the emergency service is that crews should be responding emergency calls for the majority of the shift time- although these are by nature difficult to predict, the demand management modelling is growing ever more sophisticated and SECamb are more able to predict which geographical location crews and vehicles will be needed, and at what times of the day, with increasing accuracy. As a result, it is anticipated that the ACRP will be used by a maximum of two crews at any one time, but more usually, by a single crew. The provision of space for the parking of up to two vehicles is therefore considered to be suitable, adequate and appropriate for this use.
- 4.18 Given the above, it is submitted that there is no conflict with the policies of the development plan in this regard.

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## 5.0 Conclusions

- 5.1 This statement demonstrates that the proposal is in accordance with the material policies in the development plan.

### **Benefits of the proposal**

- 5.2 The proposed development is part of the implementation of the strategic Make Ready Centre being rolled out by SECAmb across the region, and will facilitate the effective and efficient delivery of the ambulance emergency service. It is also part of the infrastructure required for the delivery of the allocated strategic housing development SD2 (Pagham North), and to that end, is compliant with the Council's strategic objectives.
- 5.3 The design and appearance of the proposed building will result in a positive impact on the character and appearance of the area, and the use of the proposed materials and the proposed landscaping can be secured with appropriate conditions and will also ensure that the development makes a positive contribution to the streetscene.
- 5.4 The proposed building and use will not compromise or cause harm to the amenities of the adjoining land uses, in particular the residential development being built out to the east.
- 5.5 The highway access and parking provision is considered suitable and adequate for the proposed use, and will ensure that there will be no on street parking as a result of the development.
- 5.6 In the light of the above, it is submitted that the proposed development does not conflict with the policies of the development plan. As a result, it falls within the definition of sustainable development set out in paragraph 11 of the NPPF and should be granted planning permission without delay.

**APPENDIX 1- pre application advice**



Arun District Council  
Arun Civic Centre  
Maltravers Road  
Littlehampton  
West Sussex BN17 5LF  
Planning & Building Control General Enquiries  
Tel: (01903) 737756 Fax: (01903) 730442  
Dx: 57406 Littlehampton  
Minicom: 01903 732765  
e-mail: [planning@arun.gov.uk](mailto:planning@arun.gov.uk)  
website: [www.arun.gov.uk/planning](http://www.arun.gov.uk/planning)

Colin Smith  
33 Broadwick Street  
London  
W1F 0DQ

Date: 4th October 2023

Please ask for: Jessica Riches  
Tel: 01903 737852

Your Ref:  
Our Ref: PAA/70/23/

Dear Mr Smith,

## Pre-Application Advice

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Siting of an Ambulance Community Response Post.  
Land North of Sefter Road and 80 Rose Green Road Pagham

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I write regarding the above matter and your enquiry received on 25th July 2023.

## SCOPE OF PRE-APPLICATION ADVICE

The proposal is for an ambulance response station, consisting of a break room, toilet, and kitchenette. The building is a pre-fabricated structure measuring 3m deep and 10m wide.

**RELEVANT POLICIES AND GUIDANCE** - the following policies are considered relevant to your proposal:

### Arun Local Plan 2011-2031

<u>DDM1</u>	D DM1 Aspects of form and design quality
<u>HSP2</u>	H SP2 Strategic Site Allocations
<u>DSP1</u>	D SP1 Design
<u>LANDM1</u>	LAN DM1 Protection of landscape character

## ADVICE

### PRINCIPLE OF DEVELOPMENT

The proposal is for an ambulance response post station, consisting of a break room, toilet,

and kitchenette.

The Section 106 agreement for P/134/16/OUT designated 0.03ha of freehold land to provide an Ambulance Community Response Post Facility. To the west of the site there are existing trees and hedges which form the boundary of the wider development site known as Sefter Road. Beyond this, there are open agricultural fields. To the east there is a primary access road to the development known as Sefter Road, lined with residential dwellings on the opposite side.

The location of the land for this response post has been considered as part of the reserved matters application P/49/21/RES. The ambulance response post facility land is located to the north of the Scout Hut and the primary access road for the development site.

Whilst the principal of this response post has been established, details relating to the layout, scale and appearance are to be determined.

## DESIGN - SCALE AND APPEARANCE

The building would be located along the primary entrance road to the development, meaning that the building would contribute significantly to the street scene. The building would be located adjacent to the open countryside to the west and would appear closely associated with the proposed Scout Hut which is the only other building located to the west of the primary entrance route. Therefore, a suitable scale, design and material palette should be used to provide a building which is complementary to its surroundings.

The proposed location of the ambulance post facility is located within the red line boundary of outline planning permission P/134/16/OUT, which was subject to a Design Code, approved alongside reserved matters permission, P/49/21/RES. Development within this site is subject to policy H SP2: Strategic Site Allocations, which requires development to be comprehensively planned. In addition, Policy D DM1 requires good design with reference to reflecting surrounding character, materials, and design features. It is therefore encouraged to utilise the parameters and principles of the approved design code to develop the buildings overall design. The development site sits within the "principal route" character area at the entrance to the site.

The proposed building appears to be a pre-fabricated modular unit which would appear utilitarian. The material choice and simple block form would have a temporary character and would appear incongruous within the street scene and would result in harm to the character of the surrounding built residential development and scout hut. It is acknowledged that there is existing and proposed screening in the form of soft landscaping which will help to screen a building in this location, however the proposed building is required to be well designed in order to integrate with its surroundings.

Given the sites location adjacent to the open countryside and requirement to appear well integrated with other built form on the site, a one storey development would be supported by officers. However, consideration should be given to the incorporation of a small lightweight roof, or contemporary design which would help to provide some interest to the form of the building.

Materials such as grey/red roofs, tile hanging, red brick, and cladding on key corner plots are

included as part of the Principal Route character area and are used to provide architecturally distinctive areas to help legibility and place making through the scheme. The proposed development should take cues from the design code character areas to provide additional architectural and materials that are complementary to and enhance the character of the area.

## SOFT LANDSCAPING

Any building would need to be well screened through the use of soft landscaping, this will ensure that the building is well screened within the street scene whilst mitigating any disturbance associated with the use upon the adjacent residential development.

Some landscaping has been proposed as part of P/49/21/RES; this includes a native hedgerow mix consisting of hawthorn, dogwood, and elder etc. It would be required to ascertain how high this hedgerow is likely to mature to so that officers can understand the full visual extent of the building within the street scene. Planting should be of an appropriate height, and as such additional provision of a suitable small trees may be beneficial in the south-eastern corner of the application site to intercept views of the building when entering the wider site.

In any event, the proposals should not prohibit the delivery of soft landscaping through another reserved matters approval. Therefore it is advised to fully show how the proposals under P/49/21/RES sit within or outside of the site itself.

## USE

The applicant has confirmed that ambulance staff will use the facility sporadically throughout the day and night, for short statutory meal breaks and times when staff are waiting to be assigned a response call. It is highly unlikely that there will be periods of time longer than statutory meal breaks as typically there is little downtime due to the demands of ambulance crew.

In addition, whilst it is unlikely that two crews or more will require the same meal break period or rest time, Arun District Council (ADC) would want to ensure that overturn of ambulance vehicles or bunching up of crews is kept to a minimum to ensure the disturbance of residents is kept at an acceptable level as well as ensuring there is adequate parking. ADC may therefore wish to impose a planning condition on the number of waiting crews at any one time.

## FACILITIES, DRAINAGE AND ACCESS

In relation to other matters such as facilities, and services, this site is under construction and it would be advised to make early communication with this developer to ensure adequate connections and avoid traffic delays.

Suitable access for ambulances should be required both to and from the site and within it. Please ensure that adequate turning circles are provided so that ambulances can adequately park within the site and do not result in parking in unallocated visitor parking spaces.

In addition, if the building or unit requires foundation, please ensure that the drainage strategy for the scheme has accounted for any changes to permeability on this site.

## PAGHAM AND ALDWICK ADVISORY GROUP

Whilst not required as part of the pre application process, this application was presented to the Pagham and Aldwick advisory group, held on 19th September 2023. The feedback from attendees was that the development looked temporary in nature and was not in keeping with its surroundings. Additionally, there were concerns regarding the use of the site access when ambulance crews were needing to respond to calls.

## CONCLUSION

Were a planning application to be submitted for the ambulance station as proposed it is likely that it would be recommended for refusal. The reason for this recommendation is that the pre-fabricated design of the building would appear incongruous and out of character with the locality of the site both in terms of design and materials. Consideration should be given to a more sensitive materials palette or design which better reflects the residential character of the site.

Further screening of the building in order to mitigate its visual impact could also be considered and may help to alleviate some of these concerns as well as minimise disturbance generated by ambulance crews accessing or departing the site during the night or early in the morning.

## FOLLOW UP MEETING

If you require a follow up meeting to discuss this pre-application and advice, you will need to forward a written request quoting reference PAA/70/23/ together with a fee. You can either make payment on line <https://www1.arun.gov.uk/make-a-payment/start> or send a cheque made payable to Arun District Council if you have not already included it in the fee you have paid.

## MAKING AN APPLICATION

If you decide to proceed with making an application you will need to quote this pre application advice reference number PAA/70/23/ in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

**You will need to provide all the plans and supporting information as indicated in the relevant Planning Validation Requirements List on our website:** <https://www.arun.gov.uk/making-a-planning-application#Planningvalidation>

## APPLICATION REQUIREMENTS

In addition to the statutory and local validation requirements, please note the key information that is required in order to assess the application and/or reduce the need for planning conditions, which may delay your ability to commence on site.

- Material schedule / sample
- Ecological enhancements (water butts, bird/bat boxes etc)
- Details relating to any security lighting
- Details relating to soft landscaping



You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the case officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request.

Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations or ordinary watercourse consents. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'NC' followed by a flourish.

Neil Crowther  
Group Head of Planning

From: Jessica Riches <Jessica.Riches@arun.gov.uk>

Sent: 25 March 2024 10:13

To: Colin Smith <[REDACTED]>

Subject: RE: SECAMB - Land North of Sefter Road and 80 Rose Green Road Pagham

Hi Colin,

Thank you for your patience.

I have reviewed the attached and have no overall concerns. This is much better than the previous design and is much more aligned with the scout hut.

I note that you asked me to confirm what I meant by “the front of the building” – apologies I meant the eastern elevation area.

The easiest way to deal with this application is to submission a full application – I have considered Hillside, but feel there would be no conflicting issues with carrying out the rest of the scheme in full and so a full planning permission would be the easiest way to deal with this aspect.

Kind Regards,

Jessica Riches (She / Her)

Principal Planning Officer

Strategic Development Team, Planning

T: 01903 737852

E: [jessica.riches@arun.gov.uk](mailto:jessica.riches@arun.gov.uk)

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