

Re: Site at Sefter Road
Bognor Regis
West Sussex.

Planning Design and Access Statement

Chartered Town Planner



Contents

1. Context
2. The Proposal
3. Planning Policy
4. Flood Risk Assessment
7. Form and design
8. Living conditions of existing residents
9. Living conditions of proposed residents
10. Flood risk
11. Conclusion on main issues
13. Five year housing land supply and the tilted balance
14. Conclusion

Context

The application site is located a short distance to the west of the defined built up area for Bognor Regis. The site is unused and has been for many years. To the southwest, west and northwest the site adjoins existing housing and to the north it adjoins Hook Lane. Elsewhere the site adjoins one of the strategic housing sites allocated in the Arun District Local Plan 2011 – 2031.

In September 2019 Outline Planning Permission (P/30/19/OUT) was granted for the development of this strategic housing site for up to 300 homes, an 80 bed care home, up to 4000sq.m of Class D1 uses, including a primary school and associated infrastructure.

The Proposal

The proposal is for the development of the site for 4. No. three bed and 2No. four bed dwellings on the site, with associated parking and access.

Access to the site will be directly off Sefton Road. For full details of this access refer to the Highway report prepared by Highgate Transportation, dated December 2019.

Planning Policy

National Planning Policy Framework 2019 (Framework)

The Core principles of the Framework are to adopt a pro-active approach and local authorities should approach applications in a positive and creative way. Decisions-makers at all levels should seek to approve applications for sustainable development where possible and should determine applications in accordance with the development plan unless material considerations dictate otherwise. (Sections 2 and 4).

To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. Small sized sites can make an important contribution to meeting the housing requirement of an area and are often built out quickly. Accordingly, at least 10% of an authority's housing requirement should be met on small sites. Windfall sites should be supported and all housing applications should be considered in the context of the presumption in favour of sustainable development. (Section 5)

The Framework states that strategic policies relating to housing need should be informed by local housing need assessments. Paragraph 73 states that local authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years worth of Housing against their housing requirement set out in adopted strategic policies, or against their local housing need where strategic policies are more than 5 years old. Such figures should include appropriate buffers.

The Framework places increased emphasis on making effective use of land, with section 11 of the Framework being dedicated to this. It states that planning policies and decisions

should give substantial weight to the value of using suitable brownfield land within settlements for homes and to promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

In relation to density, the Framework 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 for the potential of each site. Plans should include the use of minimum density standards and proposals that fail to make efficient use of the land should be refused.

Regarding meeting the needs of everyone paragraph 91 of the Framework addresses healthy communities. It seeks to deliver social, recreational and cultural facilities and services such as local shops, meeting places, sports venues, cultural buildings, public houses and other local services. It states that authorities should ensure an integrated approach in considering the location of housing, economic uses and community facilities and services. (Section 8)

Concerning design, section 12 of the Framework states that new development should function well and add to the overall quality of the area; establish a strong sense of place, optimise the potential of the site and reflect the identity of local surroundings, while not preventing or discouraging appropriate innovation. Planning decisions should not stifle innovation, originality or initiative.

In relation to flooding section 14 of the Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Strategic policies should be informed by a strategic flood risk assessment and the cumulative impacts in, or affecting local areas susceptible to flooding and advice from the Environment Agency and other flood risk management authorities.

Paragraph 164 and footnote 51 of the Framework specifically states that applications for changes of use, other than changes of use to a caravan, camping and chalet site, or mobile home park, should not be subject to the sequential or exception tests but should meet the requirements for site specific flood risk assessments.

National Planning Practice Guidance (NPG)

Regarding design the NPG refers to paragraph 130 of the Framework and the newly published National Design Guide.

The NPG advocates making effective use of land and advises that densities can be measure in terms of dwellings per hectare and bed-spaces per hectare. It advises that all developments should maintain acceptable living standards in relation to daylight and sunlight. Paragraph 005 Reference: ID : 66-005-20190722).

The NPG advises on how to undertake objectively assessed housing needs and on how to apply paragraph 11 of the Framework.

In relation to flood risk paragraph 048 Reference ID: 7-048-20140306 of the NPG advises that a change in use may involve an increase in flood risk if the vulnerability classification of the development is changed. In such cases the applicant will need to show in their Flood Risk Assessment that future users of the development will not be placed in danger from flood risk throughout its lifetime. Mitigation measures may be necessary and it is for the applicant to show that the change of use meets the objectives of the Framework's policy on flood risk.

National Design Guide 2019

The NDG encourages looking at the sites context in relation to its surroundings and making efficient use of land. Well-designed neighbourhoods provide a variety and choice of homes to suit all needs and ages and which are well integrated. Homes should provide good internal living spaces with access to private gardens and public spaces.

Government New Homes bonus (NHB)

This bonus secures additional funding for local authorities when granting planning permission for new housing. The additional funds help keep Council tax rates down and help fund local services and facilities for local people. Section 143 of the Localism Act and S.70 of the Town and Country Planning Act state that certain financial contributions, such as NHB are a material consideration in the determination of planning applications.

Housing Delivery Test 2018

The Housing Delivery Test 2018 identifies Arun as requiring an action plan to address its under-provision of housing over the past three years. It has provided 91% of its target.

Arun District Local Plan 2011 – 2031 (LP)

Within the LP the application site is shown as abutting both the defined built-up area and the Strategic Housing Site SD2. It is also within the wide gap between Bognor Regis and Chichester.

Policy SD SP1 advocates a presumption in favour of sustainable development and Policy SD SP1a allows for sustainable growth to meet the needs of the District. Policy SD SP2 explains that development should be focused within the built up area boundary and policy C SP1 states that development will be allowed outside the defined built up area boundary where it meets with other policies set out in the LP. Policy SD SP3 seeks to protect the coalescence of settlements through the identification of gaps. Within these gaps development will be permitted where it will not undermine the physical and visual separation of settlements; would not harm the integrity of the gap or if allocated through a DPD or Neighbourhood Plan. Policy LAN DM1 seeks to protect the landscape character of the District.

Regarding housing the LP explains that the final policy target takes account of the objectively assessed housing need (OAN). It sets a target of 20,000 homes by 2031.

Policy H SP1 advises that the phased housing is for some 1,120 dwellings per annum between 2016 and 2021, which this figure rises to 1310 dwellings per annum. It advises that 800 homes are allocated on the strategic housing site adjacent to the application site. Also, that additional housing sites will be allocated through Neighbourhood Plans.

Policy ENV SP1 encourages the preservation of the countryside. Policy ENV DM2 allows for developments within 0 – 5km of Pagham Harbour subject to financial contributions. Policies W SP1 and W DM2 deal with flood risk and Policy W DM3 deals with sustainable drainage systems.

Housing Delivery Test – Action Plan June 2019

In accordance with the Housing Delivery Test 2018 the Council has published an action plan to address the housing shortage within the district. It advises that Arun currently has a 4.7 year supply of deliverable housing sites and that housing delivery has underperformed over the first five years of LP period.

Some of the actions included in the document are:

- To apply paragraph 11d of the Framework until the 5 year supply of housing land is re-established.
- Invite applications from land owners and developers o “deliverable” HELAA sites to re-establish the 5 year HLS.
- Seek the allocation of a range of smaller sites to foster the small build sector and diversify the developer/provider base through the Development Plan.

Pagham Development Management Neighbourhood Plan 2019 – 2026 (Draft) July 2019. (NP)

The NP is at consultation stage at present.

DM Policy 1 seeks to achieve sustainable development in Pagham. In relation to minor developments, it will be supported where any application is supported by sufficient evidence to demonstrate that it is in accordance with the development plan unless material considerations dictate otherwise.

DM Policy 3 seeks to protect Pagham Harbour.

Flood Risk Assessment

The site is located within Flood zone 1 on the Environment Agencies web site and is similarly shown to be at low risk of all types of flooding within the Arun District Strategic Flood Risk Assessment 2016.

This is illustrated in the flood maps submitted with the application.

The proposal is modest in size and form and will not increase the risk of flooding on the application site or elsewhere.

Amount

The proposal is for 4 three Bed and 2 two bed houses. Whilst only in outline form the illustrative plan indicates that the 3 bed houses would have a footprint of some 55m² and the 4 bed houses would have a footprint of some 90m². The dwellings would all be two storey's in height.

Affordable Housing Statement

With 6 dwellings the proposal falls below the threshold for affordable housing provision. Due to its limited size it simply would not be possible to accommodate 10 or more dwellings on the site without the site appearance cramped and out of keeping with its surroundings.

Biodiversity Survey and Report

A full biodiversity survey and report has been undertaken by Lizard Landscapes and Ecology. It concludes that, subject to the recommendations set out in the report the proposal would be acceptable and would not have a harmful impact on any habitats.

As part of the proposal the applicant will make the necessary contribution to the Pagham Harbour SPA mitigation scheme.

Sustainable Drainage

The proposal is for a sustainable drainage system (SUD). As a small development on the edge of the settlement, gravel and other permeable surfaces are appropriate for most of the hard surfacing. The downpipes on the dwellings will be fitted with water butts. It is noted that with the strategic site to the east a drainage basin is proposed within the open space to the southeast of the application site, which will benefit the application site.

Foul and Surface Water Drainage

This can be provided via treatment works such as Klargestors or can link in with the approved foul and surface water drainage systems proposed for the adjoining strategic housing site.

Landscape Strategy

Within the Arun Landscape Study – Landscape and Visual Amenity Aspects of Development Choices in Arun District (2006 – 2026) the application site falls within Landscape Character Area 6: Rose Green Coastal Plain. This area is described as having a “high landscape capacity” to accommodate change.

Character Study The site is extremely well contained be bordered to the north/northwest, west and southwest by houses and parking areas and to the southeast by the strategic housing site. It is effectively an infill site that was not included in the strategic site due to its separate ownership. The layout has been designed to respond positively to the masterplan for the strategic site. The proposed back gardens will adjoin the proposed boundary planting adjacent to the public open space to the southeast. The proposed houses will also

be separated from the adjacent dwellings by the existing/proposed access and parking areas and existing/proposed gardens.

From the northwest and southwest the proposed dwellings would be effectively screened by existing development and hedges. From the north and east the proposed dwellings would be seen within the context of and against the backcloth of the existing dwellings and their gardens/parking areas. The whole group of existing and proposed dwellings would be seen as an integral part of the strategic housing site.

There are no public rights of way within or within sight of the application site.

Lighting Assessment

As indicated above the site is contained between dwellings, Sefton Road, Pagham Road and the strategic housing site. The proposed dwellings would be orientated towards existing houses and the strategic housing site and it is envisaged that they would be of traditional construction with solid tiled roofs. External lighting can be at low level and kept to a minimum through the imposition of an external lighting condition.

Bin Storage and Collection Provision

The indicative layout plan shows where bin and refuse storage could readily be accommodated.

Parking Plan

The indicative layout plan shows 15 on-site parking spaces, which could readily include an electric charging point to serve all 6 dwellings. In addition, there is ample room to provide garden sheds that can each accommodate cycle racks for several cycles.

Transport Statement

A separate transport statement has been prepared by Highgate Transportation. It concludes that:

"It is finally concluded that the proposed development is acceptable in highway terms."

Sustainability conclusion

Economic

The proposal will make full use of a vacant site and will provide local employment during its construction.

Social

The proposal will provide six family dwellings and will make a modest, yet important contribution to the supply of homes in the district.

Environmental

The scheme will include the ecology enrichment measures set out in the ecology report prepared by Lizard Landscape and ecology. At the same time the site is well contained and will not have a harmful impact on the landscape.

The proposal will include energy efficiency both within the fabric and inside the proposed dwellings. Will include water recycling measures and an electric car charging point.

Policy conclusion

The proposal fully complies with the environmental policies set out in the Local Plan, NP and the Framework. Whilst the site is located outside the defined built up area boundary and within a 'gap', it adjoins the built up area boundary and is surrounded by existing and proposed housing. The land is vacant and has absolutely no agricultural value and appears as forgotten corner in relation to the adjoining strategic site. Also, Arun currently does not have a deliverable five year supply of housing sites and this small site is available for development now.

Tilted Balance

Arun District currently does not have a 5 year deliverable supply of housing sites. In addition, the 2018 Housing Delivery Test shows that over the past three years Arun has failed to deliver the number of homes required and as required Arun has now produced an action plan to demonstrate how it will address the shortfall.

The Council's annual monitoring report confirms that the Local Plan was prepared largely in the Framework 2012. The Framework 2019 seeks to significantly boost the supply of homes and changes have been made to how objectively assessed housing need is calculated. It advises that Arun needs to show a 20% buffer in relation to its housing site supply and that housing delivery in Arun is not performing strongly enough when compared to the stepped delivery requirements set out in the Local Plan.

Overall, the monitoring report confirms that as at November 2019 Arun had a 3.7 year supply of deliverable housing sites.

As such the tilted balance set out in paragraph 11 of the Framework applies. It states permission should be granted unless:

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.

The proposed scheme will provide six family homes. It will make a small yet important contribution to meeting this need and in meeting the need for more homes in the District. At the same time the New Homes Bonus funds the Council would receive would enable them to invest in local services and facilities for the community. Also, the application site is located adjacent to existing and proposed housing and visually is within the planned settlement of Bognor Regis. These are benefits which provide a very strong positive weight

to the planning balance. This is both due to the real benefits they provide, coupled with the identified existing and projected future housing shortage in the District.

The construction of the development will provide employment and the occupiers of the proposed dwellings will support local services and facilities. The proposal will make effective use of a redundant parcel of land and the scheme would not result in the loss of any wildlife habitats. In these ways the proposal will comply with the economic, social and environmental objectives of sustainable development. Similarly, these are benefits which gives positive weight to the planning balance. For these reasons the tilted balance weighs heavily in favour of the proposal and very clearly outweigh any policy conflict or other harm that could result from the proposal.

Planning Application Summary

- Currently ADC does not have a deliverable five year supply of housing sites. As such the proposal needs to be considered in accordance with paragraph 11 of the Framework
- The site adjoins the built up area boundary for Bognor Regis.
- The site adjoins a major housing allocation site that benefits from planning permission.
- The site is surrounded by existing and proposed housing developments.
- The site is currently unused and has been for some years.
- The proposal is for 6No.houses with access off Sefter Road.
- The development is safe in highway terms.
- The development will not have a detrimental impact on ecology.
- The site lies within Flood zone 1 and is not liable to flooding.
- Surface water can be discharged into an existing water course.
- Foul drainage will be via a treatment plant. (Klargestor or similar).
- The proposal will blend in readily with its surroundings and will have a negligible impact on the landscape.
- The proposal will not undermine the physical and visual separation of Bognor Regis and Chichester or the integrity of the gap between them. This is due to the site's location sandwiched between existing and proposed dwellings and its high level of screening.
- As a consequence, the proposal complies with the highway, landscape, ecology, drainage, location and other environmental and housing policies set out in the Framework and the Local Plan, in so far as they are applicable to the proposal.