



**LRM**  
PLANNING  
LIMITED

## **HOOK LANE, PAGHAM**

**Application for the Approval of reserved matters for the construction of 300 no. new homes, internal roads, footpaths and cycleways, car parking and landscaping pursuant to Condition 1 of outline planning permission P/30/19/OUT.**

**Hallam Land Management Limited**

**Planning Statement**

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# 1 Introduction

- 1.1 Arun District Council granted outline planning permission (the 'Permission') for the following development at Hook Lane Pagham on the 2<sup>nd</sup> September 2019:

*"the construction of up to 300 No. new homes, a care home of up to 80 beds, D1 uses of up to 4,000 sqm including a 2 form entry primary school, the formation of new means of access onto Hook Lane & Pagham Road, new pedestrian & cycle links, laying out of open space, new strategic landscaping, habitat creation, drainage features & associated ground works & infrastructure".*

## Approval of Reserved Matters – Condition 1

- 1.2 In accordance with Section 92 of the Town and Country Planning Act 1990 (as amended), *Condition 1* of the Permission requires an application for the approval of 'reserved matters' to be made within 3 years of the date of the permission. This present application therefore seeks:

***"Approval of reserved matters for the construction of 300 no. new homes, internal roads, footpaths and cycleways, car parking and landscaping pursuant to Condition 1 of outline planning permission P/30/19/OUT".***

- 1.3 In this instance, the reserved matters which require approval comprise (a) layout, (b) scale, (c) appearance, (d) landscaping.
- 1.4 *Condition 7* of the Permission specifies the landscaping and layout particulars to be submitted with an application for the approval of reserved matters.
- 1.5 For the avoidance of doubt, 'access' drawings were approved as part of the Permission and the approved plans are listed under *Condition 3*.<sup>1</sup> As such, 'access' is not a reserved matter and the development is to be undertaken in accordance with those approved plans. The approved plans show the general arrangement of those points of access; the detailed engineering design (i.e. the horizontal and vertical alignment) are subject of Agreements under Section 278 of the Highway Act 1980.
- 1.6 *Appendix 1* lists the drawings which comprise this application for the approval of reserved matters.

## The approved Design Code Masterplan

- 1.7 *Condition 6* of the Permission requires a Design Code Masterplan to be approved prior to the submission of the Reserved Matters.
- 1.8 The purpose of the Design Code Masterplan was to demonstrate how detailed proposals would reflect the objectives of (1) the Development Framework Plan 167/P/006 Rev E; (2) the Landscape Masterplan 167/P/003 Rev D and (3) the Design and Access Statement.
- 1.9 As such, *Condition 6* establishes a primacy to the Development Framework Plan and Landscape

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<sup>1</sup> Proposed Access Arrangement on Hook Lane (North) -JNY8840-09 Rev A and Proposed Access Arrangement Pagham Road – JNY8840-12 Rev A.



Masterplan as the basis for the Reserved Matters Applications.

- 1.10 The Design Code Masterplan was a mechanism to enable further detailed principles to be set out that mirrored the structuring elements provided by these two plans and the Design and Access Statement as a platform for this current stage and the reserved matters.
- 1.11 Importantly, the Design Code Masterplan was concerned with "*controlling the development in detail in the interests of amenity by endeavouring to achieve buildings of visual quality in accordance with Policy D DM1 of the Local Plan*".
- 1.12 Its purpose in this regard was concerned with the visual appearance of buildings (and spaces) and hence the content of the design code in establishing principles relating to character areas, street hierarchy, building typologies, key buildings, the approach to car parking, structural planting, street furniture, lighting and treatment of the public realm. It intentionally did not include technical detail which is within the purview of other planning condition
- 1.13 The Applicants submitted the Design Code Masterplan on the 18<sup>th</sup> June 2020 and Condition 6 was duly discharged by the Local Planning Authority on 9<sup>th</sup> October 2020.<sup>2</sup>

#### Environmental Impact Assessment

- 1.14 Development of the scale, type and character proposed by this reserved matters application has twice been screened to determine whether it constitutes EIA development under the Town and Country Planning (Environmental Impact Assessments) Regulations; first in 2016 and then again in 2019.
- 1.15 In the first instance, the Local Planning Authority issued a negative screening opinion (i.e. the development proposed was not EIA development).
- 1.16 More recently in May 2019, the Secretary of State issued a further negative separate screening direction in association with planning application P/6/17 which was the subject of an Appeal under Section 78 of the Town and Country Planning Act 1990.
- 1.17 This reserved matters application is entirely within the ambit of the proposed development which was considered in those instances.

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<sup>2</sup> P/57/20/DOC



## 2 The Reserved Matters Application

### Condition 1

- 2.1 Condition 1 of Permission requires the submission of an application for the approval of 'reserved matters' within 3 years of the date of the permission.
- 2.2 The reserved matters specified in Condition 1 are (a) layout; (b) scale; (c) appearance; (d) landscaping.
- 2.3 Article 2 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 provides the definition of each of the above reserved matters as follows:
- **Layout** - the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development;
  - **Scale** - the height, width and length of each building proposed within the development in relation to its surroundings;
  - **Appearance** - the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture;
  - **Landscaping** - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features.
- 2.4 This application is made for the approval of these reserved matters in respect of the approved **residential development** and **associated open space**.
- 2.5 Drawn material relating to the layout, appearance and scale of the housing component has been prepared by Thrive Architects. Landscaping details have been prepared by Urban Wilderness. Engineering details has been provided by Brookbanks Consulting.
- 2.6 A subsequent reserved matters application will be made in respect of the Care Home element of the proposed development. The site area to which the reserved matters application relates is shown on Plan LP.01; this is entirely within the area of land which benefits from the outline planning permission.

### Condition 7

- 2.7 *Condition 7* of the Permission specifies the landscaping and layout particulars to be submitted with an application for the approval of reserved matters:
- i. *Details of all existing trees and hedgerows on the land, showing which are to be retained and which are to be removed;*



- ii. Details of the positions, height, design, material and type of boundary treatment to be provided;
- iii. Details of any proposed alterations in existing ground levels, and of the position of any proposed excavation, within the crown spread of any retained tree
- iv. The detailed hard and soft landscape design for the development including the layout and design of the public realm within the development;
- v. Details of the surfacing, lighting and signage of all footpaths, cycle routes and a phasing plan for their provision.

2.8 This information is provided on the various drawings prepared by Urban Wilderness.

#### D1 Uses

2.9 The Permission granted consent for the construction of *inter alia* up to 300 new homes, a care home of up to 80 beds, D1 uses of up to 4,000 sqm including a 2 form entry primary school.

2.10 The law on the scope of reserved matters applications is well settled and the key principles can be summarised as follows:

- A reserved matters application must fall within the boundaries of the outline permission. You cannot use a reserved matters application to provide more, or a fundamentally different, development to that authorised by the outline consent (*see Calcaria Construction Co. (York) v Secretary of State for the Environment (1974) 27 P. & C.R. 435*)
- It is however legally permissible to omit a use which was included in the outline permission in a subsequent reserved matters approval, unless that use is expressly required as part of the consent itself (*R. v Hammersmith and Fulham London Borough Council Ex p. Greater London Council (1985) 51 P. & C.R. 120*)
- It is equally permissible to seek reserved matters approvals for only part of the overall consented development (*see for example R. v Secretary of State for the Environment Ex p. Percy Bilton Industrial Properties (1975) 31 P. & C.R. 154*).

2.11 The approach to correctly interpreting planning permissions has also been determined by reference to planning law. The core principles, however, can be distilled as follows:

- When construing a planning permission which is clear, unambiguous and valid on its face, regard may only be had to the planning permission itself, including any conditions and the reasons for those conditions (*Ashford Borough Council, ex p Shepway District Council [1999] P.L.C.R. 12*)
- This includes any plans or documents expressly incorporated on the face of that planning permission (*Barnet v Secretary of State for Communities and Local Government [2009] EWCA Civ 476*);
- Generally the content of a planning application and any other extrinsic evidence is not to be taken into account, unless the planning permission directly incorporates the application documents by reference (*Slough Borough Council v Secretary of State for the Environment and Oury [1995] 3 PLR 28*)



- 2.12 Following the principles set out in Barnet, the planning permission for Hook Lane comprises the Decision Notice itself and also the Development Framework Plan, Design and Access Statement and s.106 Agreement, which are expressly incorporated into it through the text at the beginning of section 4 of the consent and the wording of *Condition 6*.
- 2.13 The permission does not contain a planning condition relating to the D1 use. There are no restrictions in either the permission or in the s.106 Agreement requiring the Applicant to deliver these uses, or indeed, preventing other uses coming forward in their place.
- 2.14 This is in clear contrast with other elements of the development which are considered to be integral to the scheme, for example the provision of open space, where it is clear what land is defined as open space, how a scheme detailing the areas of open space is to be provided and approved, and by when the areas of open space are to be provided.
- 2.15 Conversely, both the Development Framework Plan and the Design and Access Statement anticipate that the D1 uses may not be delivered. They expressly state that their proposed locations could instead be used for residential development.
- 2.16 As such, there is no requirement in the Permission for the Applicant to bring forward land for the D1 uses and a reserved matters application which provides 300 new homes and omits the D1 uses would be wholly consistent with the scope of the outline planning permission.
- 2.17 By correspondence dated the 23<sup>rd</sup> July 2020, Officers of the District Council confirmed that as a matter of fact and degree, the omission of the school site and D1 uses from a reserved matters application would not put the approval of the reserved matters outside the terms of the outline planning permission.

#### Drawings, Plans and Documents

- 2.18 This reserved matters application comprises the drawings, plans and documents listed in Appendix 1. This comprises in broad terms the following: [
- Site Layout Plans: Site Layout, Affordable Housing, Parking Layout, Boundary Materials, Dwelling Materials, Refuse Strategy
  - Street Elevations
  - House Types and Plots and ancillary details
  - Vegetation Retention and Removal Plan– Information detailing trees/hedges to be retained and those to be removed.
  - Hardworks Plans – Information including hard landscape material finishes, boundaries and edges, play features, furniture, bins and informal road crossings.
  - Softworks Plans – Information detailing the positioning/extent of soft landscape features associated with front gardens and public open space including trees, hedgerows and ornamental planting and seed mixes.
  - Softworks Schedule – Specification associated with the above Softworks Plans detail
  - Engineering drawings: drainage, road layout and visibility and refuse vehicle swept paths, finished floor levels, and lighting



### Matters not covered by this Application

- 2.19 The details provided as part of the application for approval of the Reserved Matters do not address, nor are they required to, the following matters which are each the subject of separate Conditions which are to be discharged separately:
- (a) A scheme of phasing for the construction of the dwellings and associated highways and public areas. Condition 4 requires such a phasing scheme be approved prior to development taking place.
  - (b) A schedule of materials and finishes to be used for external walls and roofs. Condition 5 requires this to be submitted before development is carried out.
  - (c) An Arboricultural Method Statement and a Tree Protection Plan. Condition 9 requires this to be approved prior to the commencement of development.
  - (d) Details of the proposed surface water drainage scheme. Conditions 10, 11, 12 and 13 variously require this information to be approved prior to the commencement of development or information to be provided immediately following implementation of the approved scheme.
  - (e) Details of the proposed foul water drainage scheme. Condition 14 requires this to be approved prior to the commencement of development.
  - (f) A scheme for external lighting. Condition 15 requires this to be approved prior the occupation of the first dwelling.
  - (g) A Construction Management Plan. Condition 16 requires this to be approved prior to the commencement of development.
  - (h) An Employment Skills Plan. Condition 19 requires this to be approved prior to the commencement of development.
  - (i) Details of the closure of the existing accesses on to Sefter Road. Condition 22 requires this prior to the development being first occupied.
  - (j) Details and timetable for the installation of real time information screens at bus stops on Pagham Road. Condition 23 requires this information prior to the occupation of the first dwelling.
  - (k) Details of pedestrian and cyclist access points. Condition 24 requires such details to be approved prior to the development being first occupied.
  - (l) A Travel Plan. Condition 25 requires this to have been approved prior to the development being first occupied
  - (m) Renewable or low carbon energy generation. Condition 26 requires such details to be approved prior to the commencement of the dwellings approved by the permission.
  - (n) Broadband provision. Condition 27 requires a Strategy to be approved prior to the commencement of development.



- (o) Details of hedgerow enhancement for use by bats. Condition 29 requires these details to be approved prior to the commencement of development.
  - (p) A further badger survey. Condition 30 requires this to be undertaken prior to the commencement of development.
  - (q) An Ecological Management and Enhancement Plan. Condition 32 requires this to be agreed prior to the commencement of development of any preparatory works.
  - (r) An Electrical Vehicle Charging Strategy. Condition 33 requires this to be approved prior to the commencement of development.
- 2.20 Where necessary, appropriate and relevant, information in respect of the above topic areas has been taken into account in formulating the reserved matters application and this is referred to in this Planning Statement.
- 2.21 For completeness, Condition 28 requiring a written scheme of archaeological investigation was discharged on the 10<sup>th</sup> December 2019 (P/103/19/DoC refers).
- 2.22 Moreover, the details provided as part of the application for approval of the Reserved Matters do not specifically address, nor are they required to, the following planning obligations in the Section 106 Agreement that is part of the planning permission:
- (a) an Affordable Housing Scheme to be prepared for each Housing Phase and submitted to the LPA for approval prior to the commencement of construction of any Housing Phase (First Schedule, Part 1, paras 1.2 and 1.3);
  - (b) a Scheme for the Western and Northern areas of public open space which are required prior to the commencement of development of the first and last housing phase (First Schedule, Part 5, paras 5.1, 5.2 and 5.3).
- 2.23 These considerations have nevertheless been embedded into the layout and landscaping details as explained in Section 3.
- 2.24 Lastly, West Sussex County Council has issued Technical Approval for the means of access onto Hook Lane and Pagham Road (email 2<sup>nd</sup> September 2020) and the legal agreement pursuant to Section 278 of the Highway Act 1980 is being prepared at the present time on the basis of the drawings approved for construction purposes.



### 3 The Proposed Development

- 3.1 This Section describes the main elements of the proposed development for which reserved matters approval is sought.

#### Housing

- 3.2 The proposed Site Layout is shown on plan SL.01 and identifies **300 new homes** arranged in a manner consistent with that illustrated on the Development Framework Plan and the approved Design Code Masterplan (Regulating Plan, page 21).

#### Market and Affordable Housing

- 3.3 The First Schedule of the S106 agreement requires that 30% of the total number of new homes provided are 'affordable dwelling houses' as defined therein.
- 3.4 On the basis that the total number of houses to be built is 300, that requires 90 affordable houses and 210 market houses.
- 3.5 Plans SL.01 P10(A) and AHL.01 identify the location of the **90 affordable houses**.

#### Housing Mix

- 3.6 Policy H DM1 of the Arun District Local Plan concerns Housing Mix and seeks a mix of dwelling types and sizes, to include affordable housing units. It states that, for developments of this scale, *"a balanced mix of market and affordable dwelling sizes including family sized accommodation is required, based on the most up to date SHMA recommendations"*.
- 3.7 The analysis in the most recent SHMA indicates:
- *"for affordable housing, the profile of homes needed is focused more strongly towards smaller properties; whereas*
  - *in the market sector, demand for two- and three-bed properties predominate"*.
- 3.8 In its pre-application advice dated 27<sup>th</sup> March 2020, the District Council set out the Housing Mix recommendations in the September 2016 SHMA as follows:

Table 3.1: Housing Mix recommendation

|                            | 1 bedroom | 2 bedrooms | 3 bedrooms | 4+ bedrooms |
|----------------------------|-----------|------------|------------|-------------|
| 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%       |

- 3.9 The above illustrates that the greatest proportion of new homes should be 2 and 3 bed market houses, with a lesser proportion of 1 and 4 bedroom properties.
- 3.10 Later in the advice the comments of the Housing Strategy and Enabling Manager are provided which specify the affordable housing mix which should be provided in this instance as follows:



Table 3.2: Recommended Affordable Housing Mix

|              | 1-bedroom | 2-bedrooms | 3-bedrooms | 4+ bedrooms |
|--------------|-----------|------------|------------|-------------|
| Rented       | 17        | 31         | 14         | 6           |
| Intermediate | 5         | 11         | 6          | 0           |
| Combined     | 22        | 42         | 20         | 6           |
| Percentage   | 24%       | 47%        | 22%        | 7%          |

3.11 The proposed housing mix is shown on SL.01 P7 and has been reproduced in Table 3.3.

Table 3.3: Proposed Housing Mix

| House Type Ref | House Type   | No of Bedrooms | NDSS Compliance | M4(2) Compliance | M4(3) Compliance | No |
|----------------|--------------|----------------|-----------------|------------------|------------------|----|
| Market         |              |                |                 |                  |                  |    |
| SL             | Slater       | 2              | ✓               |                  |                  | 7  |
| CO             | Cooper       | 2              | ✓               | ✓                |                  | 22 |
| WO             | Woodcarver   | 2              | ✓               |                  |                  | 8  |
| CN             | Coiner       | 2              | ✓               | ✓                |                  | 25 |
| TA             | Tailor       | 3              |                 |                  |                  | 8  |
| TH             | Thespian     | 3              | ✓               |                  |                  | 5  |
| QU             | Quilter      | 3              | ✓               |                  |                  | 18 |
| TN             | Tanner       | 3              | ✓               |                  |                  | 4  |
| CS             | Coppersmith  | 3              | ✓               | ✓                |                  | 14 |
| BM             | Blemmere     | 3              | ✓               | ✓                |                  | 4  |
| FM             | Framer       | 3              |                 | ✓                |                  | 17 |
| MA             | Mason        | 3              | ✓               |                  |                  | 15 |
| ST             | Sculptor     | 4              |                 | ✓                |                  | 5  |
| BO             | Bowyer       | 4              | ✓               |                  |                  | 15 |
| GO             | Goldsmith    | 4              | ✓               |                  |                  | 13 |
| GO-BW          | Goldsmith    | 4              | ✓               |                  |                  | 1  |
| AR             | Arkwright    | 4              |                 | ✓                |                  | 24 |
| WE             | Weaver       | 4              | ✓               |                  |                  | 5  |
| Affordable     |              |                |                 |                  |                  |    |
| SO             | Souter       | 1              | ✓               | ✓                |                  | 18 |
| GL-1           | Glover       | 1              | ✓               | ✓                |                  | 4  |
| GL             | Glover       | 2              | ✓               | ✓                |                  | 14 |
| BA             | Baker        | 2              | ✓               | ✓                |                  | 16 |
| RO             | Romsey       | 2              | ✓               |                  | ✓                | 12 |
| PW             | Ploughwright | 3              | ✓               | ✓                |                  | 5  |
| TI             | Tilman       | 3              | ✓               | ✓                |                  | 15 |
| CT             | Cartographer | 4              | ✓               | ✓                |                  | 6  |



3.12 Tables 3.4 and 3.5 summarise the housing mix shown in Table 3.3 and on SL.01 P10(A).

Table 3.4: Proposed Market and Affordable Housing Mix (numbers)

| No of Bedrooms | Market Housing | Affordable Housing | Combined |
|----------------|----------------|--------------------|----------|
| 1-bedroom      |                | no.22              | no.22    |
| 2-bedroom      | no.62          | no.42              | no.104   |
| 3-bedroom      | no.85          | no.20              | no.105   |
| 4-bedroom      | no.63          | no.6               | no.69    |
| Total          | no.210         | no.90              | no.300   |

Table 3.5: Proposed Market and Affordable Housing Mix (percentages)

| No of Bedrooms | Market Housing | Affordable Housing | Combined |
|----------------|----------------|--------------------|----------|
| 1-bedroom      |                | 24%                | 7%       |
| 2-bedroom      | 30%            | 47%                | 35%      |
| 3-bedroom      | 40%            | 22%                | 35%      |
| 4-bedroom      | 30%            | 7%                 | 23%      |
| Total          | 100%           | 100%               | 100%     |

- 3.13 Consistent with the broad conclusions of the SHMA, the greatest proportion of market housing is 2- and 3-bedroom accommodation; in excess of two-thirds of the new homes to be provided.
- 3.14 Pagham is not considered a location suitable for 1-bedroom market flats; this would be not characteristic of the local area. As such no 1-bedroom flats are provided.
- 3.15 The amount of 4-bedroom properties proposed reflects market information and, overall, the market mix provides family sized accommodation.
- 3.16 The affordable housing mix is wholly consistent with that required by the Council's Housing Enabling Officer as set out in the pre-application advice.

### Building Heights

- 3.17 The Design and Access Statement submitted with the outline planning application identifies the height parameter for new houses – up to 2 storeys in height (9.5m to the ridge). All new houses are approximately 9m in height.

### Adaptable Housing

- 3.18 Condition 34 of the Planning Permission requires:
- at least 50% of the total number of dwellings to be designed and constructed to m4(2) (accessible and adaptable) standard; and
  - an additional two units to be constructed to m4(3) (wheelchair user dwellings) standard for every 50 dwellings developed on the site.
- 3.19 The Building Regulations Part M provide the appropriate definitions and technical standards.
- 3.20 On the basis that the detailed layout proposes the construction of 300 new homes, this Condition requires at least 150 dwellings to be design and constructed to m4(2) standard and 12 additional dwellings to be constructed to m4(3) standard.



3.21 The Site Layout Plan identifies those properties which are m4(2) complaint, totaling 190 dwellings, therefore exceeding the requirement in Condition 34.

3.22 In addition, the Romsey House Type is m4(3) compliant and there are 12 such dwellings proposed on the Site Layout Plan, in accordance with Condition 34.

### Car Parking

3.23 Arun District Council adopted Parking Standards Supplementary Planning Document (SPD) in January 2020. Table 3.6 illustrates the car parking standards for Zone 2.

Table 3.6 ADC Parking Standards SPDC

| <b>Number of Bedrooms</b> | <b>Parking Behaviour Zone 2 – Space requirement</b> |
|---------------------------|-----------------------------------------------------|
| 1                         | 2                                                   |
| 2                         | 2                                                   |
| 3                         | 2                                                   |
| 4+                        | 3                                                   |

3.24 Plan PSL.01 illustrates the level of parking proposed which accords with the above Standards.

3.25 In addition, visitor parking will be required to be provided at a ratio of 20% of the total number of residential units. In this instance 300 new homes requires 60 visitor spaces. The Parking Strategy Plan 61 illustrates the visitor spaces.

### Electric Vehicle Charging

3.26 The SPD also provides standards for Electric Vehicle Charging; all new houses with a driveway and a garage are required to provide active EV charging points. This reflects Policy QE DM3 of the Local Plan which seeks to encourage the use of electric vehicle charging points. Condition 33 requires a strategy to be submitted prior to the commencement of development. The layout does not prejudice the provision of EVC.

### Cycle Parking

3.27 The SPD also provides recommended levels of cycle provision. Table 3.7 illustrates the recommended levels for different dwellings sizes.

Table 3.7 ADC Parking Standards SPD – recommended level of cycle provision

| <b>Number of Bedrooms</b> | <b>Cycle Provision</b> |
|---------------------------|------------------------|
| Houses (1 and 2 bedrooms) | 1 space                |
| Houses (3+ bedrooms)      | 2 spaces               |
| Flats (1 and 2 bedroom)   | 1 space                |

3.28 Cycle storage is provided either within the garage where this is provided, or the garden shed. This is shown on the Parking Strategy Layout PLS.01. Maisonettes have internal storage and/or bike stores.

### Refuse Storage and Collection

3.29 The Refuse Strategy Layout RSL.01 shows the location of refuse storage and collection points.



## Landscaping and Open Space

3.30 Section 5 of the approved Design Code Masterplan includes Design Objectives for the areas of Public Open Space. Key points are summarised below:

- To create attractive useable spaces that are accessible to all.
- To deliver a high-quality POS network including equipped and naturalistic play, an ecologically diverse network of habitat typologies, and a topographical rise facilitating views toward the South Downs National Park.
- To use structural planting and open spaces to provide an effective transition between urban and rural environments and which draws upon existing planting found locally to the site.
- To maintain and enhance existing boundary vegetation. On the eastern boundary, new planting should balance the visual integration of the existing urban area with the new development whilst softening views into the site. On the outer edges of the scheme (north and west), structural planting should be positioned to facilitate visual connectivity between the wider landscape and proposed POS/public realm, whilst elsewhere screening the new development and framing select views.
- The realignment and re-establishment of the existing watercourse through the Site so that it increases in functionality, biodiversity potential and visual amenity.
- A street hierarchy that includes street tree planting and a hierarchy of soft landscaping treatments to define key routes, road intersections and to soften parking areas. Street trees should also be used as focal features at the end of vistas and around incidental green spaces wherever possible.

3.31 Five Public Open Space typologies are to be provided as follows:

- Sefter Meadow
- Northern and Western Edges
- Children's Play Area
- Rife Green
- Eastern Edge

3.32 The Character of these individual typologies are defined on pages 36 – 42 of the Design Code Masterplan.

3.33 A detailed set of Hardworks and Softworks drawings 167-RM-[02-16] have been produced in order to identify different surface finishes, the location and specification for street furniture, play spaces, boundary treatments, tree and shrub planting, habitat creation, topographical features and cycle infrastructure. These drawings demonstrate compliance with the above Public Open Space Typologies in design ambition, layout, composition and specification. These drawings include the Public Open Space Typologies and Character Area boundaries identified within the Design Code overlaid upon the Hardworks and Softworks drawings to aid easy correlation between the Design Code and the Reserved Matters drawings. This identification of Design Code areas should be read alongside the accompanying Design Code Compliance Statement



which provides further explanation with regard to the ways in which the drawings have been informed by the Code.

### Drainage

- 3.34 A Flood Risk Assessment was submitted with the outline planning application which included an Illustrative Surface Water Drainage Strategy (*4147-D-02 Rev E Appendix 1*). The proposed drainage strategy is to mimic the existing drainage regime of the site. Discharge from the site would provide betterment by maintaining existing discharge rates while allowing for a climate change increase in rainfall of up to 40%.
- 3.35 The watercourse within the Site forms a key part of the sustainable drainage strategy which will regulate surface water runoff through and from the site. This watercourse also forms part of a varied landscape topography maximising biodiversity as part of a wider habitat network. A swale is also be constructed along the Site's western boundary with Pagham Road.
- 3.36 Condition 10 of the Permission requires the full details of the proposed surface water drainage scheme to have been submitted to and approved by the LPA prior to development commencing. Those details will be provided for approval separately to discharge that condition, but the surface water details are shown on Plan 10461-DR-001(H) and accord with those set out in the Illustrative Surface Water Drainage Strategy.

### Noise

- 3.37 A Noise Assessment was submitted with the outline planning application which identified various noise contours by dB range (Appendix B Noise Mapping Results). The predominant noise source is traffic from the adjoining public highway. The submitted Report identifies the following mitigation measures to reduce the effect of noise levels of future residents of the development:
- Passive ventilation systems and standard double glazing for those residential properties fronting Hook Lane, Pagham Road and Sefter Lane;
  - Internal layout of properties to consider the location of lounge and bedroom areas to avoid sight lines towards Hook Lane, Pagham Road and Sefter Lane; and
  - Site layout to consider the orientation of residential buildings to reduce sight lines onto Hook Lane, Pagham Road and Sefter Lane.
- 3.38 In accordance with the requirements of BS 8233, the mitigation measures proposed for dwellings within + 55db area will include appropriate glazing with trickle vents and external private rear gardens will also be screened from the dominant noise source using a solid fence or screen wall.

### Lighting

- 3.39 Drawings 10461-1200-001 and 10461-1200-002 identify the location and specification of streetlighting and lighting for areas of open space, footpaths and cycleways. The Design Code states that much of the areas of green infrastructure will be unlit, thus being sensitive to existing habitats.



### *Servicing Arrangements*

- 3.40 Drawings 10461-VT-01(D), 10461-VT-02(C) and 10461-VT-03(C) illustrate vehicle tracking which demonstrates that the internal road layout caters for the movement of heavy good vehicles typical of a residential estate. As set out in the Council's pre-application advice, this is based on a 12m refuge collection vehicle.



## 4 The Development Plan

4.1 This reserved matters application is made pursuant to Section 92 of the Town and Country Planning Act and Condition 1 of planning permission 30/19/OUT.

4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

*If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.*

4.3 The Development Plan in this instance consists of the **Arun District Local Plan 2011-2031**, and the West Sussex Waste and Minerals Local Plans.

4.4 There is no “made” Neighbourhood Plan relevant to the determination of this application. Whilst a Pagham Neighbourhood Plan has been the subject to consultation under Regulation 14, and it is necessary to have regard to a Draft Neighbourhood Plan as a material consideration, the conflict between the consultation document published in July 2020 and the adopted Local Plan as it relates to this Site is such that no weight should be given to those policies. In particular, no weight can be given to the consultation document’s intention to designate land at Hook Lane as local greenspace as that is clearly in conflict with the status of the Site as an allocated Site for development. Weight is of course a matter for the decision-maker and the District Council themselves made representations to the consultation documents requesting that a number of policies be deleted or amended because of such conflict. It is instructive to note that the Officer’s Report concerning the Reserved Matters application at Sefter Road (P/24/20/RES), it advised that no weight should be attributed to the Neighbourhood Plan at that time. There has been no material change in circumstance since then and at the present time, save that, and significantly, at the Pagham Parish Council Full Council meeting on the 25<sup>th</sup> August 2020 Members resolved to withdraw the Regulation 14 Neighbourhood Plan.

### Relevant Local Plan Policies

4.5 The following Policies from the Local Plan are relevant to the consideration of matters relating to layout, landscaping, scale and appearance.

### Policy D SP1 Design

4.6 This Policy requires development proposals to make efficient use of land whilst reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

4.7 Development proposals should be derived from a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development.

4.8 The Permission establishes that up to 300 new homes can be accommodated on this Site and that this represents an appropriate balance between an efficient use of land in the context of its environs. The Officers Report concerning the outline planning application states that: *The indicative information provided adequately demonstrates that the proposed development can be*



*accommodated on the site and designed in a way which will ensure that the established character of the locality is respected in accordance with policies D DM1 and D SP1 of the Arun Local Plan.*

- 4.9 The Design Code Masterplan establishes the design principles that this reserved matters layout should comply with in order to achieve the Local Plan's design principles. The accompanying Design Code Compliance Statement illustrates how the reserved matters application accords with the approved Design Code and thus delivers the established design principles.
- 4.10 In respect of scale, the Design and Access Statement identified that development would be no more than 2 storeys in height. None of the dwellings for which approval is sought at this stage exceeds this height.

#### Policy D DM1 Aspects of Form and Design Quality

- 4.11 This Policy provides key design criteria that new development should have regard to.

#### **Character**

- 4.12 The arrangement of built development and green infrastructure within the Site was illustrated to the satisfaction of the Council in the Design and Access Statement, the Development Framework Plan and the Landscape Masterplan. These key principles were further developed in the Design Code Masterplan which set out further details in respect of character areas, street hierarchy, building typologies, key buildings, the approach to car parking, structural planting, street furniture, lighting and treatment of the public realm, again to the Council's satisfaction.
- 4.13 This Reserved Matters Application has been prepared to accord with the Design Code thus the Character principles established in the Design Code are embedded in this scheme. The Design Code Compliance Statement illustrates this. It follows that the appearance, scale, landscape and layout details for which approval is sought should also be satisfactory to the Council.

#### **Appearance/attractiveness**

- 4.14 The appearance of the new homes proposed accords with the principles for the respective character areas established in the Design Code.

#### **Impact**

- 4.15 The layout will not have any unacceptable adverse, overbearing, overshadowing or overlooking impacts adverse impact on residential properties situated along Hook Lane.

#### **Innovation**

- 4.16 Renewable or low carbon energy generation will be address pursuant to Condition 26 which requires such details to be approved prior to the commencement of the dwellings approved by the permission.

#### **Adaptability**

- 4.17 In accordance with Condition 36 a number of the properties meet the requirements associated with Accessible Housing Category M2(3) and M2(4). The areas of open space are also laid out in a manner that is accessible to future users.



### **Crime prevention**

- 4.18 The perimeter block layout approved under the Design Code enables active frontages with good surveillance to all routes and spaces through the development, convenient parking visible from the proposed dwellings and, in the small number of instances where courtyard parking is provided, dual aspect houses that provide surveillance to communal parking zones.

### **Trees and woodland**

- 4.19 The landscape details illustrate the extent both of retained vegetation but also new planting, which accords with the open spaces character areas established in the Design Code Masterplan. Boundary vegetation has been maintained and enhanced. Structural planting and open spaces have been used to Provide an effective transition between urban and rural environments. The areas of public open space provide a strong landscape framework for the new built development and which draws upon existing planting found locally to the site.

### **Solar gain**

- 4.20 The layout takes advantage of the elongated nature of the site to create an east-west street pattern which in turn enables a great proportion of individual properties to have a southern orientation to maximizes levels of sunlight and exploit passive solar energy.

### **Public realm**

- 4.21 The five open space typologies set out in the Design Code Masterplan identifies the key principles and characteristics for each. These are individually and cumulatively attractive useable spaces that are accessible to all. Streets include furniture and tree planting and a hierarchy of soft landscaping treatments that assist in defining key routes.

### **Layout - movement**

Movement routes and street hierarchies were established in the Design Code Masterplan (pages 22 and 23) and these have been carried forward into the layout plans from the residential areas and areas of public open space. As is evident from those drawings, opportunities within the Site for walking and cycling are an integral part of the overall design concept.

### **Layout - legibility**

- 4.22 The layout and the character areas, the placement of roads and new dwellings and areas of open space enables easy navigation though the development.

### **Public art**

- 4.23 The design of the areas of public open space and streets makes appropriate use of landscaping, planting, furniture, signage, and lighting to accord with the individual character areas.

### **Density**

- 4.24 The density of housing development – at 30 dwellings per hectare – is appropriate and the proposed development is an effective use of land while providing a mix of dwelling types and maintaining character and local distinctiveness.



### **Scale**

- 4.25 All dwellings are 2 storeys in height which accords with the parameters established in the Design and Access Statement. This is in general conformity with the character of the area.

### **Aspects of form and design quality**

- 4.26 The District Council are preparing a District Design Guide but that is not yet adopted policy; at the time of writing it is subject to further public consultation in September 2020. The Design Code Masterplan was prepared in the context of the National Design Guide and reflects best practice and thus it was consistent with the aspirations of the emerging Design Guide. The Design Code Masterplan underpins the details for which permission is now sought in any event.

### **Policy ENV DM4 Protection of Trees**

- 4.27 Development will be permitted where it can be demonstrated that trees protected by a Tree Preservation Order(s) (TPO) or contributing to local amenity, will not be damaged or destroyed now and as they reach maturity.
- 4.28 The Site's arboricultural resource is illustrated in the Arboricultural Assessment prepared by FPCR. Except for T1(C) which is classified as Category C (Low-Quality/Value), all other trees are situated along the Site's boundaries. T6(B), situated on the Site's eastern boundary is subject to a Tree Preservation Order (TPO/P/2/9).
- 4.29 As shown on plan 7232-A-03-F, each of these trees around the Site's boundaries are retained. None of these trees will be damaged or destroyed by the proposed development.
- 4.30 T1, a single specimen of ash in the centre of the site would require removal due to the re-alignment of the drainage ditch.
- 4.31 The TPO tree will be retained and works within close proximity will be supervised by a suitably qualified arboriculturist.
- 4.32 An extensive amount of new tree planting around the development and in area of public open space is proposed as part of the supporting Green Infrastructure. This new planting would more than offset the loss of the small amount of low-quality boundary material that requires removal to facilitate the various access points into the site. This new planting would serve to increase, enhance and improve the existing overall tree cover on site, by further contributing to the sites biodiversity and ecological recourse and aiding the built elements incorporation into the local landscape.
- 4.33 In accordance with Condition 9 of the Permission, an Arboricultural Method Statement and Tree Protection Plan will be submitted to the LPA for approval prior to the commencement of development.

### **Policy GI SP1 Green Infrastructure and Development**

- 4.34 Policy GI SP1 explains the Green Infrastructure Network and how development must be designed to protect and enhance such assets and the connection between them. Opportunities to enhance and create multi-functional Green Infrastructure are encouraged.



- 4.35 Para 7.3.12 of the Local Plan introduces the District's Green Infrastructure Network referred to in the Policy. Associated Maps, taken from the Council's website, are based on the 2012 Green Infrastructure Study, identify a network of assets to be protected, enhanced and, where possible, better connected through future development. The Green Infrastructure Study identifies 'strategic green infrastructure corridors' on Figure 4.1 and the application Site is shown as part of a West Bognor Regis GI Corridor. Table 4.2 of the Green Infrastructure Study lists the 'Key Characteristics / Benefits' and Sensitivities / Issues' for this location. For the 'Central and Northern parts' the Sensitivities and Issues comprise the following:
- i. Fragmentation and loss of hedgerows and connections between hedgerow and woodland.
  - ii. Replacement of mature treescape.
  - iii. Conserv[ing] nature conservation habitats and Grade 2 agricultural land.
  - iv. Maintain[ing] the public footpath network.
  - v. Conserv[ing] the setting to Listed buildings.
- 4.36 The extent to which application site exhibits the above features to any material extent is limited, noting that this site is Grade 2 agricultural land but the principle of its development for housing has already been established by the Local Plan and the outline planning permission.
- 4.37 Consistent with the Design and Access Statement, the Softworks Design for the development shown on drawings 167-RM-(09-15) Softworks Plans (1 to 7), comprises new structural planting, enhancements to boundary vegetation and the creation of other new habitats, including wildflower, grassland and wet meadow to maximise site wide biodiversity. Moreover, realigning and reproducing the existing watercourse through the site will increase its functional capacity, its biodiversity and its visual amenity. As such the Green Infrastructure proposals will be beneficial and will enhance ecological connectivity by creating more, bigger, better and joined areas of biodiversity that would result in a net gain within the site.
- 4.38 On this basis, as required by Policy GI SP1, the development proposals appropriately consider green infrastructure assets and protect and enhance such features through the design process.
- 4.39 In respect of lighting, in accordance with Condition 7, lighting details are shown on plans xxxx, and is discussed further in paragraph 4.47 later.
- 4.40 Lastly, it should be noted that the Green Infrastructure Study was undertaken during the early years of the Local Plan process in 2012 and therefore ahead of the Draft Plan in 2014. As such it does not include the development proposals that emerged in the form of the Main Modifications in 2018 which included the Strategic Sites in Pagham. References in the Study to Strategic Gaps do not therefore take account of the amendments to the Strategic Gap in the adopted Local Plan.

#### Policy ENV DM5 Development and Biodiversity

- 4.41 Development schemes are expected to: achieve a net gain in biodiversity and protected habitats on site; incorporate elements of biodiversity and landscape features to minimize adverse impacts on existing habitats; and facilitate the emergence of new habitats through creation of



links between habitats areas and open spaces. Where there is evidence of protected species, appropriate surveys and measures to avoid loss of the species should be incorporated in to the development scheme. All developments shall have regard to Natural England's standing advice for protected species.

- 4.42 As has been established previously, the application site is not covered by any statutory or non-statutory designations for nature conservation and no other designated sites occur in close proximity to it. Moreover, the arable habitat on site is of limited botanical interest and is not of significant nature conservation value. The ecological baseline has been considered as part of the scheme's design and Green Infrastructure proposals include the retention of the majority of habitats of conservation value along with the creation of new and locally appropriate habitats whose sympathetic management can be secured in the long-term.
- 4.43 As such, there are no significant adverse effects on protected species identified within or using the site. The creation of new and more diverse range of habitats as part of the development proposals significantly improve the capacity of the site for those protected species identified such that a significant benefit can be expected.

#### Policy LAN DM1 Protection of Landscape Character

- 4.44 This Policy variously requires special regard to be had to the setting of the South Downs National Park, for the historic character and development pattern of settlements within the District to be respected, and, more generally, for new development to respect the particular characteristics and natural features of the relevant landscape character areas and, wherever possible, to reinforce or repair the character of those areas.
- 4.45 As a matter of principle both the Local Plan and the Permission establish that this Site can be developed without any unacceptable impact on either the South Downs National Park or the historic character and development pattern of settlements. The Officers' Report to the Council's Development Management Committee states "the Design and Access Statement submitted in support of the application ... does show that the site can accommodate the scale of development proposed whilst providing adequate open space provision and respecting the site's location on the edge of the settlement". This reserved matters application adheres to the development areas identified in the Design and Access Statement and its Development Framework Plan and thus is consistent with the principles established therein.
- 4.46 The illustrative Landscape Masterplan submitted with the outline planning application and which is referenced in Condition 6 as providing the basis for how the Site should be developed, has in turn informed and underpinned the landscape principles that are embedded in the Design Code Masterplan. The accompanying Design Code Compliance Statement illustrates how the reserved matters application accords with the approved Design Code and thus delivers the established design principles. This demonstrates that the detailed design for which permission is sought respects, reinforces, or repairs the local landscape character associated with the site. The National Character Area 126: South Coast Plain underpins the design approach taken, with the characteristics/ambition captured in the Strategy for The West Sussex Landscape (SWSL - 2005), Arun Landscape Study - Landscape and Visual Amenity Aspects of Development Choices in Arun District (ALS - 2006), and the Arun Green Infrastructure Study (AGIS - 2012) forming a more detailed basis for on-site strategic landscape improvements.
- 4.47 The western, eastern and southern bounds of the site are contained by existing boundary



vegetation, including hedgerows and / or grassy ruderal field margins. Much of the existing boundary vegetation against Hook Lane is in a poor condition with large gaps along the existing hedgerow. The boundary to the west of the site is in much better condition and presents further opportunity to strengthen the landscape edge to Rose Green for wider landscape character benefit. The SWSL and AGIS identify opportunities within this local landscape to strengthen the hedgerow/woodland stock. The SWSL (pg 40) suggests the following guidelines for improving the rural urban fringe, *"Give priority to landscape enhancement on the fringes of urban areas where the landscape is degraded... encourage the planting of new woodlands and hedgerows where appropriate to reinforce existing or former landscape character"*. The ALS further builds on this suggestion by highlighting negative characteristics associated with the local landscape character (see Landscape Character Area 6: Rose Green Coastal Plain (pg7)) stating, *"The town presents a hard edge to much of the surrounding farmland with little boundary vegetation"*.

4.48 The proposed scheme seeks to bolster all boundary vegetation. Against Hook Lane new stretches of hedgerow are proposed, linking existing features to form a more comprehensive landscape boundary. This will be further bolstered by specimen tree planting within new hedgerow, or immediately against existing hedgerow. Together this planting will add visual structure/screening benefits, an improved fauna foraging corridor and enhanced streetscape for Hook Lane. To the west, the boundary of Pagham Road will be reinforced with proposed native woodland planting, softening the visual impact of the proposed development and creating a positive landscape edge to the new extents of Rose Green. Linear landscape features are also proposed within the body of the scheme itself; lengths of hedgerow and treed avenues are proposed along key green infrastructure routes associated with the new cyclepath and realigned watercourse. These features and the enhancements noted above all work together to deliver a transitional zone between Rose Green and the wider countryside as described in the AGIS (pg 37 & 50), *"There are major opportunities for enhancing the biodiversity of the intensively farmed (mainly arable) land on the coastal plain, focusing on the network of hedges, ditches and rifes that form important wildlife corridors... There are opportunities to create or retrofit a softer edge to the urban edge, with green wedges or features (such as semi-natural hedges) extending into developed land"*.

4.49 In addition to structural planting improvements, the scheme also seeks to bring the meandering characteristics of the Pagham Rife and its tributaries, to the north/west of the site, into the proposed public open space. The meandering Rifes are a key characteristic of the West Bognor Regis Green Infrastructure Corridor (p.33) identified within the AGIS, of which the site forms a part. The scheme detailed within this application seeks to renaturalise the existing canalised watercourse through realignment, shallowing of banks, and extensive replanting of marginal grasses/perennials and shrub/tree specimens. In re-naturalising the watercourse, and delivering high quality public open space immediately adjacent, the scheme further establishes an improved transition between Rose Green and the wider countryside by drawing upon the best of the local landscape characteristics and setting them within a new rural edge transitional zone.

#### Policy QE SP1 Quality of the Environment

4.50 New development should contribute positively to the quality of the environment and should not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District.

4.51 In so far as residential amenity is concerned, the proximity of existing properties along Hook



Lane and the proposed new dwellings was considered as part of the outline planning application. Based on the separation distances between existing properties and those shown on the indicative layout, the Officers' Report explains that there would not be any unacceptable adverse, overbearing, overshadowing or overlooking impacts (subject to appropriate design, fenestration arrangements and scale).

- 4.52 SL.01 illustrates the extent of separation – generally in excess of 25 meters - between the new houses and those existing properties on Hook Lane

#### Policy QE DM2 Light Pollution

- 4.53 This Policy indicates that outdoor lighting schemes will be considered against the following criteria:
- a. No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation;
  - b. Light levels being the minimum required for security and working purposes;
  - c. Minimising the potential glare and spillage; and
  - d. The degree to which outdoor lighting can be powered by on-site renewable sources.
- 4.54 In accordance with Condition 7, lighting details are shown on plans 10461-1200-01(D) and 10461-1200-02(D). This also has to be read in conjunction with Condition 15 which requires a Scheme for external lighting to be submitted and approved by the LPA prior to the first occupation of any dwelling in a particular phase. Condition 15 is concerned in particular with effects of lighting on bats.
- 4.55 The lighting scheme includes traditional column and lanterns to highways (proposed for adoption by the Highway Authority) with a suitable cowl to offer shielding in sensitive locations. Off carriageway adoptable pedestrian routes will be lit via a series of low level bollards again positioned to offer a suitable level of illumination whilst respecting sensitive receptors as far as reasonably practicable. The approved Design Code indicates the areas of open space will be largely unlit.

#### Policies T SP1 Transport and Development and T DM1 Sustainable Travel and Public Rights of Way

- 4.56 These Policy indicates that the LPA will support new development that promotes sustainable travel. The location of the development site was determined through the Local Plan process. The effect of the proposed development on the local highway network was considered, in combination with other development proposals at Pagham, in determining the relevant outline planning applications submitted previously. This led to a combined mitigation package relating to off-site highway improvements and financial contributions towards pedestrian and cycle improvements that are subject to planning obligations. Improvements to public transport measures along Pagham Road are also secured under the Permission.
- 4.57 In considering "layout" as part of this reserved matters application, this relates to "the way in which routes within the development are provided, situated and orientated". (emphasis added).



- 4.58 The Design Code Masterplan includes an Access and Movement Plan (page 22) and a Street Hierarchy and Permeability Plan (page 23). These show pedestrian and cycle routes within the development. These routes have been carried forward to the layout for which approval is sought presently as shown on SL.01 P10(A) and the Hardworks Sheets 167-RM-02 through to 08.
- 4.59 This creates a permeable and function layout designed around desire lines and connected spaces. Both the street patterns and the provision of pedestrian and cycle routes promote permeability and priority for such uses.
- 4.60 Because of the location of built development in the layout, an additional number of pedestrian and cycle connections are shown on to Hook Lane. The approved access drawings show the location of three pedestrian/cycle connections between the Site and Hook Lane with tie into the footway. The principle of pedestrian and cycle access onto Hook Lane is therefore established in the Permission and thus existing points of connection adhere to this principle. Two additional points of connection are proposed – one opposite Drift Road and a second between Drift Road and Mill Park Road which are intended to enhance permeability, connectivity and integration. Condition 24 requires the details of pedestrian and cycle links to be agreed prior to the development being first occupied. This condition originates from the Local Highway Authority's comments on the application and relates only to Hook Lane.
- 4.61 The street pattern has been designed to control vehicle speeds through best urban design practice by restricting forward visibility, narrowing street widths, providing changes in direction, changes in surface materials and tight junction radii. The layout create safe and secure routes for traffic, cyclists and pedestrians.
- 4.62 In addition to the approved footpath extensions shown on drawings JNY10434-RPS-0100-001-D<sup>3</sup> and 12-018-024 Rev C<sup>4</sup> along Hook Lane and Sefter Road which connect the two Pagham North developments, the District Council also has an ambition to create a non-motorised link directly from the northern corner of the Hook Lane development to Sefter Road. None of the drawings approved listed in the Permission include this and the principle of such an access is not part of Permission. To achieve this, the District Council will need to secure an additional consent on land outside of the application site. To facilitate such a connection, the layout plan includes an extension of the internal cycle/pedestrian network towards the Site's northern boundary; this is shown on SL.01 P10(A).
- 4.63 In respect of car parking, this Policy has to be read in conjunction with the District Council's Car Parking Strategy. As illustrated in Section 3, the level of car parking accords with that required by Zone 2 in the SPD.
- 4.64 The proposed development does not affect any Public Right of Way; none exist within the Site.

#### Policies W SP1 Water and W DM3 Sustainable Urban Drainage Systems

- 4.65 New development is encouraged to make active use of surface water as a design feature to improve and enhance waterbodies, coastal habitats or provides additional flood relief. 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

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<sup>3</sup> Hook Lane Section 278 Plan

<sup>4</sup> Sefter Road approved access drawing



(SUDS), appropriate to the size of development, at an early stage of the design process.

- 4.66 As indicated in Section 3, a Flood Risk Assessment was submitted with the outline planning application which included an Illustrative Surface Water Drainage Strategy (4147-D-02 Rev E Appendix 1). The layout plans include sustainable urban drainage features that accord with and achieve the objectives of the illustrative Surface Water Drainage Strategy.
- 4.67 Consistent with the earlier Development Framework Plan and Landscape Masterplan, the existing watercourse is to be realigned through the site so that increases in functionality, biodiversity potential and visual amenity. The watercourse forms a key part in the wider sustainable drainage strategy which will regulate run-off through and from the Site. Separate consent is required from the Local Lead Flood Authority in respect of this.
- 4.68 Swales and attenuation basins are also shown on the various landscape drawings.

#### Policy WM DM1 Waste Management

- 4.69 New residential development will be permitted provided that, firstly, it is designed to ensure that kerbside collection is possible for municipal waste vehicles and, secondly, where appropriate, communal recycling bins and safe bin storage areas are available to residents of flats.
- 4.70 Also relevant is Policy W23 of the West Sussex Waste Management Local Plan which concerns *Waste Management within Development*. This requires that waste management facilities of an appropriate type and scale are an integral part of the development. In this regard, this Policy overlaps with WM DM1 of the Arun Local Plan, which is more recent.
- 4.71 Facilities for waste management are shown on Plan RSL.01 P1. This includes the bin storage locations for recycling and household waste, and bin collection points for single plots, multiple plots and flats, along with travel distances and refuse vehicle routing.

#### Supplementary Planning Documents

- 4.72 The LPA has also published a number of relevant Supplementary Planning Documents, namely:
- Open Space, Playing Pitches and Built Facilities
  - Parking Standards
  - Design Guide
- 4.73 These are discussed in the following paragraphs.

#### Open Space, Playing Pitches and Built Facilities

- 4.74 This SPD was adopted in January 2020 following the grant of outline planning permission. Section 4 provides the methodology for the calculation of open space as part of new residential development. In this instance, this must be read in alongside the Development Framework Plan which already identifies areas of open space.
- 4.75 In simple terms, the proposed development provides parks and gardens, amenity greenspace, natural and semi-natural greenspace, an equipped area of play and smaller natural play spaces.



In overall terms the amount of green infrastructure totals circa 6.37Ha (excluding any landscape setting to the care facility). This is substantially more than the amount of open space that would be required by application of Table 4.1.1 of the SPD.

- 4.76 In respect of the Enhanced Local Equipped Area of Play, its location is identified on both the Open Space Plan at Appendix 5 of the Section 106 Agreement and the Public Open Space Typologies Plan in the approved Design Code Masterplan. Drawing 167-RM-06 provides the details of the Enhanced Local Equipped Area of Play. Local Areas of Play, which comprise natural play opportunity, are also shown on drawings 167-RM-[03 & 07]. Please note the buffer dimensions identified on aforementioned drawings accord with the Arun Supplementary Planning Document - Open Space, Playing Pitches, Indoor and Built Sports Facilities, Appendix 2, Table A2.1. Please also note that the two southerly LAPs proposed in the Design Code have been relocated to better accord with the above-mentioned Arun SPD. In evolving the scheme from Design Code Masterplan to Reserved Matters detail, the locations suggested for these two LAPs became compromised by their proximity to Hook Lane pedestrian access points and by reduced levels of natural surveillance. In relocating the LAPs to the locations suggested the users would benefit from a safer and more easily controlled immediate environment; with vehicular traffic limited to local residents travelling at reduced speeds. The suggested locations also benefit from improved natural surveillance whilst still adhering to the SPD buffer guidelines.
- 4.77 There is no requirement for the proposed development to provide either a playing field or a Multi-Use Games Area as there are provisions in the S106 Agreement relating to financial contributions towards such measures.
- 4.78 The various forms of open space would be integrated into the development with appropriate buffer zones to protect the amenity of future occupiers while retaining good levels of surveillance from the adjacent housing. The hard and soft landscape treatment of those spaces will help create individual character or identity areas within the development. The wider green infrastructure would provide a framework that softens the development from more distant views, including those from the South Downs National Park and, more locally, will achieve an appropriate transition to the countryside to the west.

#### Parking Standards

- 4.79 This SPD was also adopted in January 2020. Paragraphs 3.22 – 3.24 summarise the standards as they apply to this location - Zone 2 - and the extent of car parking proposed.

#### Design Guide

- 4.80 The Design Guide has been subject to consultation but is still a draft document. Notwithstanding its status in this regard, its principles were taken into account in preparing the Design Code Masterplan, which is specific to this Site and the proposed development.
- 4.81 The Design Code Masterplan takes precedence over the draft Design Guide and on the basis that detailed design which is subject to this application accords with and delivers the various design objectives set out in the Design Code Masterplan it is wholly appropriate to approve the submissions.



### Summary

- 4.82 The above passages illustrate how the proposed development has appropriate regard to the relevant aspects of the Local Plan and also supplementary guidance. With the benefit of the Design Code Masterplan, the design strategy and principles has been further developed and this reserved matters application has proceeded entirely in accordance with it. It follows that the detailed design – appearance landscape, layout and scale - accords with the policy objectives in the Local Plan and this justifies the approval of the reserved matters applications required by Condition 1 of the planning permission.



## 5 Summary

- 5.1 This Planning Statement has been prepared to accompany and explain the reserved matters application submitted by Hallam Land Management Limited pursuant to Condition 1 of outline planning permission P/30/19/OUT.
- 5.2 The reserved matters application relates to appearance, landscaping, layout and scale of the housing and open space elements of the proposed development. The Care Home will be subject to a separate reserved matters application at a later date.
- 5.3 The LPA approved a Design Code Masterplan in October 2020 and, as required, the reserved matters application has been prepared to accord with this. The accompanying Design Code Compliance Statement illustrates how the established, defining principles for layout, boundaries and building form and streets and architectural detailing and material have influenced the this more detailed design stage. Critically, the detailed design for which approval is sought at the present time is in accordance with the approved Design Code Masterplan as required by Condition.
- 5.4 In the context of relevant Development Management Policies in the adopted Local Plan, the submitted proposals similarly accord with the objectives set out therein.
- 5.5 For these reasons, the submitted details are entirely appropriate as the detailed design of appearance, landscaping, layout and scale and LPA should approve this reserved matters application.

***LRM Planning Ltd***  
***December 2020***



## Appendix 1. List of Drawings

| Drawing Title                            | Reference      | Rev    |
|------------------------------------------|----------------|--------|
| Site Layout                              | SL.01          | P10(A) |
| Site Layout North                        | SL.01-N        | P10(A) |
| Site Layout South                        | SL.01-S        | P10(A) |
| Affordable Housing Layout                | AHL.01         | P1(A)  |
| Boundary Materials Layout                | BML.01         | P1(A)  |
| Dwelling Material Layout                 | DML.01         | P2(A)  |
| Location Plan                            | LP.01          | P1(A)  |
| Parking Strategy Layout                  | PSL.01         | P1(A)  |
| Refuse Strategy Layout                   | RSL.01         | P2(A)  |
| Noise Assessment Layout                  | NAL.01         | P4     |
| Street Elevation A-A                     | SE.01          | P2(A)  |
| Street Elevation B-B                     | SE.02          | P2(A)  |
| Street Elevation C-C                     | SE.03          | P2(A)  |
| Street Elevation D-D                     | SE.04          | P2(A)  |
| Street Elevation E-E                     | SE.05          | P2(A)  |
| Street Elevation F-F                     | SE.06          | P2(A)  |
|                                          |                |        |
| Surface and Foul Water Drainage Strategy | 10461-DR-001   | G      |
|                                          |                |        |
| Road Layout and Visibility               | 10461-HL-01    | A      |
| Road Layout and Visibility               | 10461-HL-02    | A      |
| Road Layout and Visibility               | 10461-HL-03    | A      |
| Refuse Vehicle Swept Paths               | 10462-VT-01    | D      |
| Refuse Vehicle Swept Paths               | 10462-VT-02    | C      |
| Refuse Vehicle Swept Paths               | 10462-VT-03    | C      |
|                                          |                |        |
| Finished Floor Levels                    | 10461-EW-001   | A      |
| Finished Floor Levels                    | 10461-EW-002   | A      |
| Finished Floor Levels                    | 10461-EW-003   | A      |
|                                          |                |        |
| Lighting Layout                          | 10461-1200-001 | D      |
| Lighting Layout                          | 10461-1200-002 | D      |
|                                          |                |        |
| Vegetation Retention and Removal Plan    | 167-RM-01      |        |
| Hardworks Plan Sheet 1                   | 167-RM-02      | A      |
| Hardworks Plan Sheet 2                   | 167-RM-03      | A      |
| Hardworks Plan Sheet 3                   | 167-RM-04      | A      |
| Hardworks Plan Sheet 4                   | 167-RM-05      | A      |
| Hardworks Plan Sheet 5                   | 167-RM-06      | A      |
| Hardworks Plan Sheet 6                   | 167-RM-07      | A      |
| Hardworks Plan Sheet 7                   | 167-RM-08      | A      |
| Softworks Plan Sheet 1                   | 167-RM-09      | A      |
| Softworks Plan Sheet 2                   | 167-RM-10      | A      |



| Drawing Title                                         | Reference             | Rev   |
|-------------------------------------------------------|-----------------------|-------|
| Softworks Plan Sheet 3                                | 167-RM-11             | A     |
| Softworks Plan Sheet 4                                | 167-RM-12             | A     |
| Softworks Plan Sheet 5                                | 167-RM-13             | A     |
| Softworks Plan Sheet 6                                | 167-RM-14             | A     |
| Softworks Plan Sheet 7                                | 167-RM-15             | A     |
| Softworks Schedule                                    | 167-RM-16             | A     |
| Footpath/Cycle Path Phasing Plan                      | 167-RM-17             | A     |
|                                                       |                       |       |
| House Types                                           |                       |       |
| Arkwright-Country-Brick-Plans and Elevations          | HT.AR.C.01.pe         | P2(A) |
| Arkwright-Country-Tile-Plans and Elevations           | HT.AR.C.02.pe         | P1(A) |
| Arkwright-Town-Brick Detail-Plans and Elevations      | HT.AR.T.01.BD.pe      | P2(A) |
| Arkwright-Town-Brick-Plans and Elevations             | HT.AR.T.01.pe         | P1(A) |
| Arkwright-Town-Weatherboard-Plans and Elevations      | HT.AR.T.03.pe         | P1(A) |
| Baker(2 block)-Country-Brick- Elevations              | HT.BA.2Blk.C.01.e     | P1(A) |
| Baker(2 block)-Floors Plans                           | HT.BA.2Blk.p          | P1(A) |
| Bowyer-Country-Brick-Plans and Elevations             | HT.BO.C.01.pe         | P1(A) |
| Bowyer-Country-Tile-Plans and Elevations              | HT.BO.C.02.pe         | P1(A) |
| Bowyer-Country-Tile-Half Hip-Plans and Elevations     | HT.BO.C.02.HH.pe      | P1(A) |
| Bowyer-Town-Brick-Plans and Elevations                | HT.BO.T.01.pe         | P1(A) |
| Bowyer-Town-Brick Detail-Plans and Elevations         | HT.BO.T.01.BD.pe      | P1(A) |
| Bowyer-Town-Render-Plans and Elevations               | HT.BO.T.02.pe         | P1(A) |
| Bowyer-Town-Weatherboard-Plans and Elevations         | HT.BO.T.03.pe         | P1(A) |
| Coiner(2 block)-Floors Plans                          | HT.CN.2Blk.p          | P1(A) |
| Coiner(2 block)-Town-Brick Detail-Elevations          | HT.CN.2Blk.T.01.BD.e  | P1(A) |
| Coiner(2 block)-Town-Brick Detail-Gable-Elevations    | HT.CN.2Blk.T.01.BDG.e | P1(A) |
| Coiner(2 block)-Town-Brick-Elevations                 | HT.CN.2Blk.T.01.e     | P1(A) |
| Coiner(2 block)-Town-Brick-Gable-Elevations           | HT.CN.2Blk.T.01.G.e   | P1(A) |
| Cooper(2 block)-Town-Brick-Gable-Plans Elevations     | HT.CO.2Blk.T.01.G.pe  | P1(A) |
| Cooper(2 block)-Town-Brick-Plans and Elevations       | HT.CO.2Blk.T.01.pe    | P1(A) |
| Coopersmith-Country-Brick Detail-Plans and Elevations | HT.CS.C.01.pe         | P1(A) |
| Coopersmith-Town-Brick Detail-Plans and Elevations    | HT.CS.T.01.BD.pe      | P1(A) |
| Coopersmith-Town-Brick-Gable-Plans and Elevations     | HT.CS.T.01.G.pe       | P2(A) |
| Coopersmith-Town-Brick-Plans and Elevations           | HT.CS.T.01.pe         | P2(A) |
| Cartographer(2 block)-Floors Plans                    | HT.CT.2Blk.p          | P1(A) |
| Cartographer(2 block)-Country-Brick-Elevations        | HT.CT.2Blk.C.01.e     | P1(A) |
| Cartographer(2 block)-Town-Brick-Elevations           | HT.CT.2Blk.T.01.e     | P1(A) |
| Framer-Country-Brick-Plans and Elevations             | HT.FM.C.01.pe         | P2(A) |
| Framer-Country-Weatherboard-Plans and Elevations      | HT.FM.C.03.pe         | P1(A) |
| Framer-Town-Brick Detail-Plans and Elevations         | HT.FM.T.01.BD.pe      | P2(A) |
| Framer-Town-Brick-Plans and Elevations                | HT.FM.T.01.pe         | P2(A) |
| Framer-Town-Render-Plans and Elevations               | HT.FM.T.02.pe         | P1(A) |
| Goldsmith-Country-Brick-Half Hip-Plans and Elevations | HT.GO.C.01.HH.pe      | P1(A) |
| Goldsmith-Country-Brick-Plans and Elevations          | HT.GO.C.01.pe         | P2(A) |
| Goldsmith-Country-Tile-Half Hip-Plans and Elevations  | HT.GO.C.02.HH.pe      | P1(A) |
| Goldsmith-Country-Tile-Plans and Elevations           | HT.GO.C.02.pe         | P1(A) |



| Drawing Title                                                | Reference               | Rev   |
|--------------------------------------------------------------|-------------------------|-------|
| Goldsmith-Town-Brick Detail-Plans and Elevations             | HT.GO.T.01.BD.pe        | P1(A) |
| Goldsmith-Town-Brick -Plans and Elevations                   | HT.GO.T.01.pe           | P1(A) |
| Goldsmith-Town-Render-Baywindow-Plans and Elevations         | HT.GO.BW.T.02.pe        | P1(A) |
| Goldsmith-Town-Render -Plans and Elevations                  | HT.GO.T.02.pe           | P1(A) |
| Mason-Country-Brick-Plans and Elevations                     | HT.MA.C.01.pe           | P1(A) |
| Mason-Town-Brick Detail-Plans and Elevations                 | HT.MA.T.01.BD.pe        | P1(A) |
| Mason-Town-Brick-Plans and Elevations                        | HT.MA.T.01.pe           | P2(A) |
| Quilter-Country-Brick-Plans and Elevations                   | HT.QU.C.01.pe           | P2(A) |
| Quilter-Town-Brick-Plans and Elevations                      | HT.QU.T.01.pe           | P2(A) |
| Romsey(2 block)-Floors Plans                                 | HT.RO.2Blk.p            | P2(A) |
| Romsey(2 block)-Town-Brick.Elevations                        | HT.RO.2Blk.T.01.e       | P1(A) |
| Romsey(2 block)-Town-Brick-Gable-Elevations                  | HT.RO.2Blk.T.01.G.e     | P1(A) |
| Romsey-Town-Brick-Plans and Elevations                       | HT.RO.T.01.pe           | P2(A) |
| Souter/Glover(2 block)-Country-Brick-Elevations              | HT.SG.2blk.C.01.e       | P1(A) |
| Souter/Glover(2 block)-Floor Plans                           | HT.SG.2blk.p            | P2(A) |
| Souter/Glover(2 block)-Town-Brick-Elevations                 | HT.SG.2blk.T.01.e       | P2(A) |
| Souter/Glover1(2 block)-Country-Brick-Elevations             | HT.SG1.2blk.C.01.e      | P1(A) |
| Souter/Glover1(2 block)-Floor Plans                          | HT.SG.2blk..C.01.p      | P1(A) |
| Sculptor-Country-Brick-Plans and Elevations                  | HT.SR.C.01.pe           | P1(A) |
| Sculptor-Country-Tile-Plans and Elevations                   | HT.SR.C.02.pe           | P1(A) |
| Sculptor-Town-Brick-Plans and Elevations                     | HT.SR.T.01.pe           | P2(A) |
| Sculptor-Town-Render-Plans and Elevations                    | HT.SR.T.02.pe           | P1(A) |
| Tailor(2 block)-Town-Brick Detail-Gable-Plans and Elevations | HT.TA.2Blk.T.01.BD.G.pe | P1(A) |
| Tailor(2 block)-Town-Brick-Plans and Elevations              | HT.TA.2Blk.T.01.pe      | P1(A) |
| Thespian-Country-Brick-Plans and Elevations                  | HT.TH.C.01.pe           | P2(A) |
| Thespian-Town-Brick-Plans and Elevations                     | HT.TH.T.01.pe           | P2(A) |
| Tillman(2 block)-Country-Brick- Elevations                   | HT.TI.2Blk.C.01.e       | P1(A) |
| Tillman(2 block)-Floor Plans                                 | HT.TI.2Blk.p            | P1(A) |
| Tillman(2 block)-Town-Brick- Elevations                      | HT.TI.2Blk.T.01.e       | P1(A) |
| Tillman(2 block)-Town-Brick- Gable-Elevations                | HT.TI.2Blk.T.01.G.e     | P1(A) |
| Tillman(2 block)-Town-Render- Elevations                     | HT.TI.2Blk.T.02.e       | P1(A) |
| Tanner-Floor Plans                                           | HT.TN.p                 | P1(A) |
| Tanner-Town-Brick-Elevations                                 | HT.TN.T.01.e            | P1(A) |
| Tanner-Town-Weatherboard-Elevations                          | HT.TN.T.03.e            | P1(A) |
| Weaver-Country-Brick-Plans and Elevations                    | HT.WE.C.01.pe           | P2(A) |
| Weaver-Country-Tile-Plans and Elevations                     | HT.WE.C.02.pe           | P1(A) |
| Woodcarver-Town-Brick-Plans and Elevations                   | HT.WO.T.01.pe           | P2(A) |
| Woodcarver-Town-Weatherboard-Plans and Elevations            | HT.WO.T.03.pe           | P1(A) |
|                                                              |                         |       |
| Plots                                                        |                         |       |
| Plots 8-9 - Elevations                                       | P.8-9.e                 | P2(A) |
| Plots 8-9 - Floor Plans                                      | P.8-9.p                 | P1(A) |
| Plots 12-13 - Floor Plans and Elevations                     | P.12-13.pe              | P1(A) |
| Plots 24-26 - Elevations                                     | P.24-26.e               | P1(A) |
| Plots 24-26 - Floor Plans                                    | P.24-26.p               | P1(A) |
| Plots 31-32 - Elevations                                     | P.31-32.e               | P1(A) |



| Drawing Title                              | Reference    | Rev   |
|--------------------------------------------|--------------|-------|
| Plots 31-32 - Floor Plans                  | P.31-32.p    | P1(A) |
| Plots 35-36 - Elevations                   | P.35-36.e    | P2(A) |
| Plots 35-36 - Floor Plans                  | P.35-36.p    | P1(A) |
| Plots 38-39 - Floor Plans and Elevations   | P.38-39.pe   | P1(A) |
| Plots 42-43 - Elevations                   | P.42-43.e    | P1(A) |
| Plots 42-43 - Floor Plans                  | P.42-43.p    | P1(A) |
| Plots 45-46 - Elevations                   | P.45-46.e    | P2(A) |
| Plots 45-46 - Floor Plans                  | P.45-46.p    | P1(A) |
| Plots 99-101 - Elevations                  | P.99-101.e   | P1(A) |
| Plots 99-101 - Floor Plans                 | P.99-101.p   | P1(A) |
| Plots 102-103 - Floor Plans and Elevations | P.102-103.pe | P1(A) |
| Plots 123-128 - Elevations                 | P.123-128.e  | P2(A) |
| Plots 123-128 - Floor Plans sheet 1 of 2   | P.123-128.p1 | P1(A) |
| Plots 123-128 - Floor Plans sheet 2 of 2   | P.123-128.p2 | P1(A) |
| Plots 149-150 - Elevations                 | P.149-150.e  | P1(A) |
| Plots 149-150 - Floor Plans                | P.149-150.p  | P1(A) |
| Plots 159-160 - Floor Plans and Elevations | P.159-160.pe | P1(A) |
| Plots 161-162 - Elevations                 | P.161-162.e  | P2(A) |
| Plots 161-162 - Floor Plans                | P.161-162.p  | P1(A) |
| Plots 197-202 - Elevations                 | P.197-202.e  | P1(A) |
| Plots 197-202 - Floor Plans sheet 1 of 2   | P.197-202.p1 | P1(A) |
| Plots 197-202 - Floor Plans sheet 2 of 2   | P.197-202.p2 | P1(A) |
| Plots 207-209- Elevations                  | P.207-209.e  | P1(A) |
| Plots 207-209 - Floor Plans                | P.207-209.p  | P1(A) |
| Plots 216-217 - Floor Plans and Elevations | P.216-217.pe | P1(A) |
| Plots 224-226 - Elevations                 | P.224-226.e  | P1(A) |
| Plots 224-226 - Floor Plans                | P.224-226.p  | P1(A) |
| Plots 231-233 - Elevations                 | P.231-233.e  | P1(A) |
| Plots 231-233 - Floor Plans                | P.231-233.p  | P1(A) |
| Plots 236-238 - Elevations                 | P.236-238.e  | P1(A) |
| Plots 236-238 - Floor Plans                | P.236-238.p  | P1(A) |
| Plots 239-241 - Elevations                 | P.239-241.e  | P1(A) |
| Plots 239-241 - Floor Plans                | P.239-241.p  | P1(A) |
| Plots 261-263 - Elevations                 | P.261-263.e  | P1(A) |
| Plots 261-263 - Floor Plans                | P.261-263.p  | P1(A) |
| Plots 282-284 - Elevations                 | P.282-284.e  | P1(A) |
| Plots 282-284 - Floor Plans                | P.282-284.p  | P1(A) |
| Plots 291-292 - Floor Plans and Elevations | P.291-292.pe | P1(A) |
| Plots 296-297 - Elevations                 | P.296-297.e  | P1(A) |
| Plots 296-297 - Floor Plans                | P.296-297.p  | P1(A) |
| Plots 298-300 - Elevations                 | P.298-300.e  | P1(A) |
| Plots 298-300 - Floor Plans                | P.298-300.p  | P1(A) |
|                                            |              |       |
| Ancillary                                  |              |       |
| Garage Single-Floor Plans and Elevations   | GAR.01.pe    | P1    |
| Garage Double- Floor Plans and Elevations  | GAR.02.pe    | P1    |



| Drawing Title                                              | Reference     | Rev |
|------------------------------------------------------------|---------------|-----|
| Garage Twin Town-Floor Plans and Elevations                | GAR.02.2.T.pe | A   |
| Bin and Cycle Store 1-Plans and Elevations                 | BCS.01.pe     | A   |
| Bin and Cycle Store 2-Plans and Elevations                 | BCS.02.pe     | A   |
| Car Barn with Bin/Bicycle Store Floor Plans and Elevations | CBBS.01.pe    | A   |

As at 18<sup>th</sup> December 2020