

From: Daun Johnson
Sent: 02 February 2021 08:36
To: Planning Scanning
Subject: FW: Planning Application F/4/20/OUT, Yapton Neighbourhood Plan 2014 Review Reg 14 consultation .and the Arun Local Plan Review

Please upload per the instructions below (and in yellow at the end)

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From: Raymond Cole <Raymond.Cole@arun.gov.uk>
Sent: 01 February 2021 20:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: Planning Application F/4/20/OUT, Yapton Neighbourhood Plan 2014 Review Reg 14 consultation .and the Arun Local Plan Review

Please could you upload the e-mail below to the application folders highlighted at the end?

Thank you

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Subject: Planning Application F/4/20/OUT, Yapton Neighbourhood Plan 2014 Review Reg 14 consultation .and the Arun Local Plan Review

Dear All

I act for no one except myself in these matters.

F/4/20/OUT

This is an outline application with all matters except for access reserved for later consideration for the development of the site with 1,500 dwellings (Use Class C3), 60-bed care home (Use Class C2), up to 9,000 sqm of employment floorspace (Use Classes B1), local centre of up to 2,350 sqm including up to 900 sqm retail / commercial (Use Classes A1-A5) and 1,450 sqm community / leisure floorspace (Use Classes D1-D2), land for a two-form entry primary school (Use Class D1), public open space, allotments, new sports pitches and associated facilities, drainage, parking and associated access, infrastructure, landscape, ancillary and site preparation works, including demolition of existing buildings and part removal of existing runway hardstanding.

So notwithstanding all the voluminous indicative information provided if approved it can only and will only grant planning permission for the development described in the description somewhere within the site edged red accessed in the manner prescribed by the access drawing approved.

To the extent that development plan policies are material to the application the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 – these provisions also apply to appeals).

As described the development proposed is in direct conflict with relevant policies for housing in the Arun Local Plan 2018 being HSP 1, HSP2A and HSP 2 C Ford (SD8) and Policy AH SP2 Affordable housing and also fails to demonstrate compliance with Policy INF SP1 Infrastructure provision and implementation, Policy T SP1 Transport and Development Policy T SP3 Safeguarding the Main Road Network and Policy INF SP2 New Secondary School The proposal also conflicts with Policy SA1 Ford Airfield and fails to demonstrate that it can or will comply with a number of other policies in the made Ford Neighbourhood Plan. Therefore an approval in this case would be a departure from the development plan but a LPA may depart from a development plan where there are material considerations to indicate that they should.

That said the Presumption in favour of sustainable development at paragraph 11 of the NPPF 2019 now applies to the determination of the application because all the relevant development plan policies (including those relating to housing) are now out of date so that the development proposed should be approved unless the application of policies in the Framework (and not the development plan) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole (once again not the development plan)

However given that an approval in this case would have to be based on a departure from the development plan supported by the PIF and not on the basis that the development proposed was implementing the strategic allocation SD 8 it is my view that this development should not be zero rated for CIL purposes and that the necessary contributions required and generated by the development proposed should be funded and delivered by way of CIL Contributions rather than by way of a S106 Agreement.

Yapton Neighbourhood Plan 2014 Review Reg 14 consultation

This is proposed in direct conflict with relevant strategic policies in the ALP 2018, attempts to address housing needs and delivery without identifying and assessing all suitable, available and achievable housing sites in the Parish and is also premature because it is being advanced ahead of the Arun Local Plan Review now commenced.

Arun Local Plan Review

All strategic policies (those with the suffix SP) are acknowledged by Arun District Council to be out of date (particularly those relating to housing) and a Local Plan Review has now commenced (albeit in a manner that I consider to be contrary to relevant legislation, Government Policy and all available planning practice guidance)

Policy H SP1 The Housing Requirement states that Within the plan period 2011 – 2031 at least 20,000 new homes will be accommodated in the District but recent monitoring indicates that the Housing delivery strategy adopted to support that bold requirement has failed in that it only delivered some 6,010 dwellings in the period 2011 – 2020 leaving some 13,990 to be delivered in the remaining plan period.

The Council's Housing and Economic Land Availability Study 2020 states that there are deliverable sites available to deliver 2901 dwellings scattered throughout the district . (Government policy states that To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years) The same report states that the district has developable sites for some 3,740 dwellings scattered throughout the district . (Government policy states that To be considered developable sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged)

Therefore the Council has identified sites that could deliver 6641 dwellings which if allowed to be developed (none of them currently have planning permission) would reduce the remaining requirement figure in the period 2020 – 2031 to just 7,349 dwellings for the remainder of the plan period.

Therefore if the Housing requirement figure is correct (and I have seen no evidence that it is not) the problem for the Local Plan Review to solve is not how to accommodate additional housing and identify new sites rather it is how to deliver the deliverable and developable housing sites it has already identified more quickly than currently envisaged, how to change the out of date and failed Housing strategy that has prevented adequate delivery against requirement to date and then how to deliver the remaining 7,349 dwellings in the rest of the plan period.

In my view given the fact that the PIF is now in play and will be for the foreseeable future the market will take care of the delivery of the 6641 dwellings by way of the deliverable and developable sites regardless of what the Local Plan review does or does or not do as applications will be made for those sites where the market dictates that it is viable to do so and ADC will be obliged to approve those applications in accordance with same.

However the unimplemented strategic allocations SD1, SD2 , SD3, SD5 in the western part of Arun District are part of the failed housing strategy under review and are also subject (in part) to unimplemented OPPs and are, therefore, proving to be undeliverable and undevelopable so that they are not part of the solution to the districts housing delivery problems but are in fact part of the problem. Smaller developers in the western part of the district are unlikely to have the confidence necessary to bring forward their deliverable and developable sites all the time that these strategic Allocations and OPPs exist and Arun District Council continues to promote same because they will continue to be concerned about the degree to which these may saturate a limited housing market and drive down land values thereby making small sites unviable.

In my view the Local Plan Review can and should take the following simple steps in order to address these issues and such steps need to be and can be taken quickly:

- Review and remove all strategic allocations that have proven themselves to be undeliverable and developable by the end of the plan period (currently that is SD1, SD2,SD3,SD5 in the western part of Arun District
- Allocate all the identified deliverable and developable sites for housing to be developed in the first 5 years of the remaining plan period and
- Allocate a single strategic site in the western part of Arun District where the 7,349 dwellings for the remainder of the plan period can be accommodated

Such an approach would not only fully accord with all relevant Government planning policy and practice guidance but would also protect the district from the presumption in favour of sustainable development taking matters out of the control of Arun District Council and the communities they represent.

In my view the only single location that would be suitable, available and deliverable and therefore sustainable location as a strategic location to accommodate the circa 8.000 dwellings required is that focussed around Ford Airfield in the parishes of Yapton, Ford and Clymping and if those with an interest wish to know more about why and how tis can and should be done they only have to ask.

Given the foregoing I urge and will if asked to do so continue to urge Arun District Council to consider and act upon the approach I advise as it does in my view (based on over 40 years of planning experience and having been there seen it and done it) represent the only realistic and workable way out for everyone in the district with an interest in such matters including those who are opposed to the strategic allocations identified and the prospect of yet more housing being approved contrary to policy with no prospect that it will in fact deliver suitable housing in a suitable period in any case.

Thank you for considering my representations and please place this e mail on the file for F/4/20 OUT , P/132/20/RES, P/25/ 17 OUT, P/140/16 OUT, P/134/16/OUT, P/30/19/OUT and BE/148/20/OUT and please feel free to circulate my e mail to any others with an interest or not as you all see fit.

Paul Collins BA (Hons) DipTP

