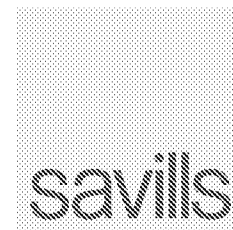


31 July 2023



David Easton
Strategic Development Team Leader, Planning
Arun District Council
Civic Centre
Maltravers Rd
Littlehampton
West Sussex
BN17 5LF

Jon Gateley
E: jon.gateley@savills.com
DL: +44 (0) 7977 197 906

Mountbatten House
1 Grosvenor Square
Southampton SO15 2BZ

savills.com

Dear Mr Easton

P/153/21/RES & P/167/21/RES - Land South of Summer Lane

Firstly thank you again for your continued engagement on this application and input to the design process in recent months, and willingness to extend timescales necessary for us to continue technical work. I am pleased to provide a thorough update of plans and documents for formal registration on the above applications.

Plans and documents

(a) Architectural

This submission includes an array of plans and drawings by HGP Architects, which for ease of transmission are merged into a smaller number of pdf files. I would particularly highlight those items in **Bold** text below which relate to the site as a whole.

21.129.02P_Site Plan

21.129.03C_BlK G_CA1 - Plans and Elevations
21.129.04B_HT Av_CA1 - Plans and Elevations
21.129.05D_HT B_CA1 - Plans and Elevations
21.129.06C_HT C_CA1 - Plans and Elevations
21.129.07C_HT D_CA1 - Plans and Elevations
21.129.09C_HT G_CA1 - Plans and Elevations
21.129.100_HT I_CA2b - Plans and Elevations
21.129.101_HT I_CA3 - Plans and Elevations
21.129.102_HT Fv_CA3 - Plans and Elevations
21.129.103_BlK R_CA3 - Plans and Elevations
21.129.104_BlK K_CA2a - Plans and Elevations
21.129.10B_BlK Bv_CA2a - Plans and Elevations
21.129.12D_BlK Kv_CA4b - Plans and Elevations
21.129.13B_BlK R_CA2a - Plans and Elevations
21.129.14C_HT Av_CA2b - Plans and Elevations
21.129.15C_HT B_CA2b - Plans and Elevations
21.129.17C_HT F_CA2b - Plans and Elevations
21.129.18C_BlK B_CA3 - Plans and Elevations
21.129.19B_BlK C_CA3 - Plans and Elevations
21.129.20B_BlK D_CA3 - Plans and Elevations
21.129.21C_BlK F_CA3 - Plans and Elevations
21.129.22B_BlK G_CA3 - Plans and Elevations
21.129.23C_BlK H_CA3 - Plans and Elevations
21.129.25B_BlK J_CA1 - Plans and Elevations
21.129.26C_BlK K_KB - Plans and Elevations
21.129.27B_BlK N_CA3 - Plans and Elevations
21.129.28C_BlK O_CA3 - Plans and Elevations
21.129.29B_BlK P_CA2a - Plans and Elevations
21.129.30B_BlK Q_CA3 - Plans and Elevations
21.129.31D_BlK S_CA3 - Plans and Elevations

21.129.32C_HT Av_CA3 - Plans and Elevations
21.129.33C_HT B_CA3 - Plans and Elevations
21.129.35C_HT F_CA3 - Plans and Elevations
21.129.37C_BlK A2_CA4b KB - Plans and Elevations
21.129.38C_BlK F_CA4b - Plans and Elevations
21.129.40B_BlK U_CA2a - Plans and Elevations
21.129.41C_BlK V_CA3 - Plans and Elevations
21.129.42C_BlK W_CA3 - Plans and Elevations
21.129.43C_BlK X_CA2a - Plans and Elevations
21.129.44C_BlK C_CA4a - Plans and Elevations
21.129.45B_BlK L_CA4a - Plans and Elevations
21.129.46D_HT E_CA4a - Plans and Elevations
21.129.47C_BlK A1_KB - Plans and Elevations
21.129.48A_BlK C_CA1 - Plans and Elevations
21.129.49C_BlK E1_CA4b KB - Plans and Elevations
21.129.50B_BlK E2_KB - Plans and Elevations
21.129.51C_BlK F1_CA4b KB - Plans and Elevations
21.129.52C_BlK F_CA1 - Plans and Elevations
21.129.53B_BlK M_KB - Plans and Elevations
21.129.54B_BlK T_CA4b KB - Plans and Elevations
21.129.57B_HT B_CA1 KB - Plans and Elevations
21.129.59C_HT D_CA3 KB - Plans and Elevations
21.129.62B_Small Double Garage - Plan and Elevations
21.129.63B_Single Garage - Plan and Elevations
21.129.64E_Northern House Type Key Plan
21.129.65E_Southern House Type Key Plan
21.129.66H_Northern Affordable Housing Plan
21.129.67H_Southern Affordable Housing Plan
21.129.73C_HT H_CA4a - Plans and Elevations
21.129.74C_BlK B_CA4b - Plans and Elevations
21.129.75C_BlK F_CA2a - Plans and Elevations

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD

ARUN DISTRICT COUNCIL P/153/21/RES



21.129.76C_Blk Y_CA4b - Floor Plans
 21.129.77C_Blk Y_CA4b - Elevations
 21.129.78C_Blk Z_CA4b - Floor Plans
 21.129.79C_Blk Z_CA4b - Elevations
 21.129.80A_Blk Dv_CA2a - Plans and Elevations
 21.129.81A_Blk G_CA2a - Plans and Elevations
 21.129.82A_Blk C_CA4b - Plans and Elevations
21.129.87_Character Areas Plan
 21.129.88_Large Single Garage
 21.129.90_Blk Ev_CA4a KB - Plans and Elevations

21.129.91_Blk Fv_CA1 - Plans and Elevations
 21.129.92_Blk Fv_CA2b - Plans and Elevations
 21.129.93_HT J_CA1 - Plans and Elevations
 21.129.94_HT L_CA3 - Plans and Elevations
 21.129.95_HT K_CA2b - Plans and Elevations
 21.129.96_HT I_CA1 - Plans and Elevations
 21.129.97_HT Iv_CA1 - Plans and Elevations
 21.129.98_Blk D_CA1 - Plans and Elevations
 21.129.99_Blk H_CA2b - Plans and Elevations

A series of overlays is also included showing the updated proposals in relation to the Design Code. In addition, please find attached street scenes and the Public Open Spaces plan and the Public Open Spaces Plan 21.129.SK205 rev L.

(b) Engineering pack

The below documents by BP Civils are also provided:

D1915 DS2.1 - Report.pdf

D1915-PL403C Catchment Areas (NORTH).pdf
 D1915-PL200E Proposed Levels & Contours (S) Sht 1 of 2
 D1915-PL201E Proposed Levels & Contours (S) Sht 2 of 2
 D1915-PL202E Proposed Levels & Contours (N) Sht 1 of 2
 D1915-PL203E Proposed Levels & Contours (N) Sht 2 of 2
 D1915-PL300L Proposed FW & SW Drainage Strategy (S) 1 of 2

D1915-PL301L Proposed FW & SW Drainage Strategy (S) 2 of 2
 D1915-PL302J Proposed FW & SW Drainage Strategy (N) 1 of 2
 D1915-PL303J Proposed FW & SW Drainage Strategy (N) 2 of 2
 D1915-PL304K Proposed FW Discharge
 D1915-PL400D Proposed Impermeable Area (SOUTH)
 D1915-PL401D Proposed Impermeable Area (NORTH)
 D1915-PL402C Catchment Areas (SOUTH).

As set out in the covering report, surface water run-off will be managed appropriately through sustainable drainage measures, with the installation of permeable paving, geocellular storage and open ponds to ensure discharge at existing greenfield rates for the catchment areas, without causing surface water flooding on site.

(c) Transport

An Addendum Transport Statement by iTransport is also included, which contains the following updated drawings (see its Appendix B):

TB16481-GA-201 Rev B – Swept Path analysis - Fire tender
 ITB16481-GA-202 Rev C- Swept Path analysis – refuse collection vehicle / water tanker
 ITB16481-GA-203 Rev B – Visibility assessment
 ITB16481-GA-204 Rev B – Road Geometry Plan

(d) Landscape

Also in the update are detailed landscape drawings ref 10095-FPCR-XX-XX-DR-L-0015-0020 P02 – containing detailed Public Open Space landscape proposals. These are shown across 5 individual plans with an overarching General Arrangement plan.

(e) Ecology

Attached in relation to ecology are a technical note by FPCR which summarises update Ecological survey and reporting work, and a Biodiversity Net Gain Metric (in Excel spreadsheet form) relating to the updated design proposals. These should be read in combination with earlier survey reports (previously submitted), other accompanying drawings, and letters from Natural England on 9 February 2022 and 21 April 2023.

Should you require copies of any of the above in hard copy format, please let me know.

Summary of updates

As set out in previous draft submissions, the amendments incorporate a reduction of 25 units, along with amendments to layout, landscaping and public open space strategy. The main driver of these amendments has been in order to meet the requirements of the Appropriate Assessment in terms of quantity/typology of open spaces, whilst continuing to deliver social and community benefits, and ensuring adherence to the Design Code and housing mix policies.

To summarise key design changes, these are as follows, incorporating and further improving on drafts that you have seen in June/July:

1. **Reduction from 375 to 350 dwellings.** This produces a significant reduction in built form and a similar increase in public open space.
2. **Allotments and orchard provision.** Provision is made for **2,000m²** of allotments and we have also set out specifics of community orchard planting within the detailed landscaping plans.
3. **Open space in northern parcel.** Officers had previously highlighted that the open space in the centre of the northern parcel of land was irregular and could be improved. In response, the layout has been adjusted to a more rectilinear shape, with the open space having a more integrated form that also relates well to the circular walk on the perimeter of the site.
4. **Open space adjoining Community Hub.** You had also previously highlighted that this space would potentially be disjointed, partly due to the drainage feature running through it. In response the updated layout includes more crossings and turns this into a positive feature.
5. **Open space within southern parcel.** The new layout enables a significant area of public open space to be opened up within the southern part of the site, contributing to a strong sense of place and quality of life consistent with the Design Code.
6. **Relationship with western boundary.** The redesign has enabled us to widen the open space along the western boundary of the site, which enables this space to function more effectively for recreation.
7. **Garden lengths.** Further fine-tuning adjustments have been made to individual plots in response to previous comments.

As noted in my email of 21 July, the improvement in open space provision has been made possible by slightly reducing the amount of road area, with this being converted to green space - a clear benefit in our view. Overall we believe the updated masterplan achieves many gains in terms of place making, layout, and the functionality of open space which we hope will be welcomed.

As discussed (and confirmed in Jessica Riches' email of 20 June), we are in agreement that the Design Code does not need to be re-discharged, given that the document serves to provide an indicative masterplan. However our updated pack includes overlays of the new layout against the Design Code to assist in clarifying this.

Appropriate Assessment matters

In your letter of 10 May, you highlighted the following concerns in particular:

- Provide a total of **5.36ha of open space and landscape planting** (excluding small pockets and strips of grassland), of this **3.29ha** as semi-natural greenspace, with **0.15ha** as equipped play space.
- Enhance the western boundary by screening with **dense tree planting** to reduce visual disturbance.

- Provide **fencing along the western and southern boundaries** to prevent dogs accessing the land to the south and west when run off their leads.
- Footpaths which link to the SPA/Ramsar site will not be closed but will not be **promoted in signage or literature for new residents, rather new on-site open space will be promoted, especially for dog walkers.**

To address the quantitative point, provision is now as follows:

Open space type	Amount required in AA	Quantity in new submission (31 July)
Total open space required	5.36 ha	5.58 ha
(of which Semi-natural green space)	3.29 ha	5.37 ha
(of which equipped play areas)	0.15 ha	0.21 ha

Overall, we believe that provision in quantitative terms is now compliant to (and slightly above) requirements and I would highlight the following from the overall masterplan:

- improved connections (i.e. an open interface) with the SANG to the north east of the site;
- the footpath link in the north western corner of the site is now omitted and integrated differently ;
- significantly denser planting is now included on the western boundary;
- there are clearer circular walk options around the whole of the perimeter of the site.

You will note that the Public Open Spaces Plan includes other land uses that fall outside of the scope of the Appropriate Assessment. For clarity and completeness these are summarised below:

Land use type	Quantity in new submission (3 July)
Incidental open space (<i>minor areas e.g. verges</i>)	0.47 ha
Drainage basins (<i>final extent subject to detailed design</i>)	0.79 ha
Adjacent open space (<i>shown to assist with interpretation</i>)	n/a
Land for allotments	0.2 ha

Transport assessment

For detailed consideration of highways matters please refer to the accompanying Addendum Transport Statement by iTransport, but as described previously, our priorities have been as follows:

- ensuring a safe and efficient network of streets, which balance place and movement function.
- meeting technical requirements of WSCC in terms of street design, geometry, visibility, and access (including for servicing vehicles).
- providing a permeable network of streets and paths (for pedestrians and cyclists) to encourage sustainable travel.
- delivering sufficient parking.
- complying with Design Code principles for movement.

As noted in my previous letter the scheme has been reduced by 25 dwellings, which is **substantially less** than the level of development permitted as part of the planning permission. In transport terms, the scheme will now generate **less traffic** than the planning permission expected, with **positive resulting impacts** for the transport network in particularly in relation to capacity and congestion matters, as well as residential amenity.

Swept path analysis and an assessment of street geometry confirms that the scheme delivers a **safe and suitable** layout, providing well for pedestrians and cyclist and allowing safe and easy movement by servicing vehicles. The street hierarchy accords with the Design Code, providing a series of Primary, Secondary, Tertiary and Quaternary streets. Car and cycle parking is provided in accordance with the Design Code and Arun DC Parking Standards SPD.

The wider changes to the scheme retain the earlier good levels of permeability and movement, but deliver a further positive improvement to the submission particularly by:

- incorporating new and improved pedestrian routes, including the circular walk and access to SANG;
- improving cycling provision, by enhancing the cycle connectivity between the northern and southern parcels;
- providing a simplified network of streets, removing longer straights, and controlling speed through design;
- creating a better relationship between dwellings and open spaces for movement to recreation spaces.

I should highlight that the layout of the site access arrangement was presented in detail within the original Transport Statement and no changes are proposed as part of this amended scheme.

The addendum Transport Statement and the drawings provided demonstrate that the amended scheme still complies with the previously agreed design principles established in the Design Code and ADC Design Guide, and thus, is acceptable in transport terms

Provision of allotments

As discussed (and as set out in my previous letter) there is a somewhat complex background over allotments provision, which I set out again below for ease of reference.

- **Arun Local Plan 2011-2031 (adopted July 2018)**

In the Local Plan, the application site is allocated via Policy H (SP2a) (SD1- Pagham South). This contains various community objectives including provision of school, care home, Community Hub, land for a scout hut and open space. However the criteria for this (f) is open-ended and does not directly reference allotments.

- **Outline planning approval (P/140/16/OUT)**

The underlying permission for the site has the following formal description (emphasis added):

Outline application for access only - mixed use development comprising of up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route & other community uses including public open space & allotments with some matters reserved.

As highlighted, the Outline permission enables allotments to be included as part of the overall public open space provision, although no specific amount is formalised. Various plans and drawings in the application (including the Illustrative Masterplan) refer to allotments at the southern end of the site, although these are not directly cited in Condition 3.

- **Section 106 agreement to the Outline permission.**

The Section 106 agreement (Nov 2018) secures an array of on-site and off-site contributions including for education, health, highway works, fire and rescue, public footpaths, police, and libraries. Obligations relating to open space included LAP, LEAP, MUGA, but echoing the above, no specific provision was made for allotments.

- **Design Code**

Condition 6 to the Outline required approval of a Design Code, to flesh out various plans from the Outline (inc. the Illustrative Masterplan). The approved Design Code makes various references to allotments albeit in general terms, referring to 'land available for', with text on page 36 stating this (emphasis added):

Future Allotment Provision

An area located to the south of the site has been set aside to enable future community growing opportunities. Exact details will follow as the design progress and further consultations are undertaken. However, the area will provide an opportunity for one or combination of the following elements:

- Formal allotments to the allotment association standards
- Communal orchard
- Community farm
- Apiary (bee keeping) with associated meadows

Again this indicates the need for flexibility.

- **Arun DC's Supplementary Planning Document on open space and sport (January 2020)**

This requires all major residential schemes (i.e. 10+ units) to contribute to allotments, with paragraph 4.24 stating that on-site provision is required only for developments of **728 dwellings or greater**, based on 5.5m² per person. For smaller schemes, an offsite financial contribution is expected based on a calculator. Below is a screenshot of the calculator as applied to this specific scheme of 350 units.

OPEN SPACE AND PLAY CALCULATOR			
Number of dwellings	350		
Population	770		
Onsite contribution requirements (SqM)	Public Open Space	Play Space	Allotments
	24,640	4,235	0
Offsite contribution requirements (£)	Public Open Space	Play Space	Allotments
	0	0	6,738

Based on all of the above, we believe there is no formal obligation for this application to include on-site allotments; indeed the site is well below the threshold for this under the SPD.

However, we recognise that an expectation has been built up from the Outline application that allotments will be provided on site, and therefore we propose the following:

- i. **On-site provision of 2,000m² of allotment space**, despite the site falling below minimal size threshold. Though modest relative to standard allotment measurements, this nonetheless provides the opportunity for a significant community-based food growing opportunity.

- ii. **Financial contribution of £6,738**, as set out by the SPD calculator, above.
- iii. **Communal orchard space**, as envisaged in the Design Code. As shown in the new landscape drawings, orchard planting would occur within land classified as “semi natural green space”, which is consistent with paragraph 6.5 of the Appropriate Assessment, which expressly refers to “tree / shrub planting”. Orchards are synonymous with the landscape of West Sussex and a key part of the rural character. Although many orchards have been lost over the past century a number remain in the local area and continue to contribute to food production, culture, and biodiversity. Community orchards are recognised as a valuable tool to foster social cohesion and provide a focus for community activities. The orchard is located adjacent to the new allotment and arranged on a layout that provides ample space between the trees for people to enjoy the space or organise gatherings or activities. The trees will be sourced from local suppliers and will be chosen to reflect the heritage of the local area.

We have made contact with Pagham Parish Council and are looking to arrange a face-to-face meeting in the next few weeks to discuss the above.

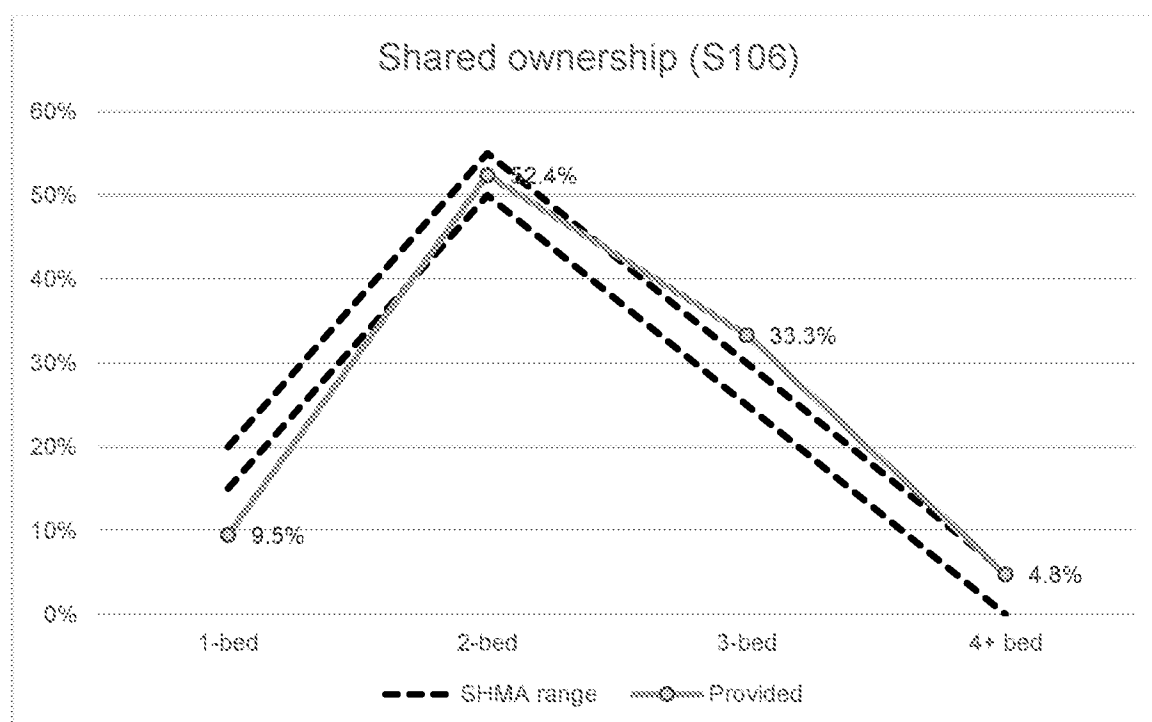
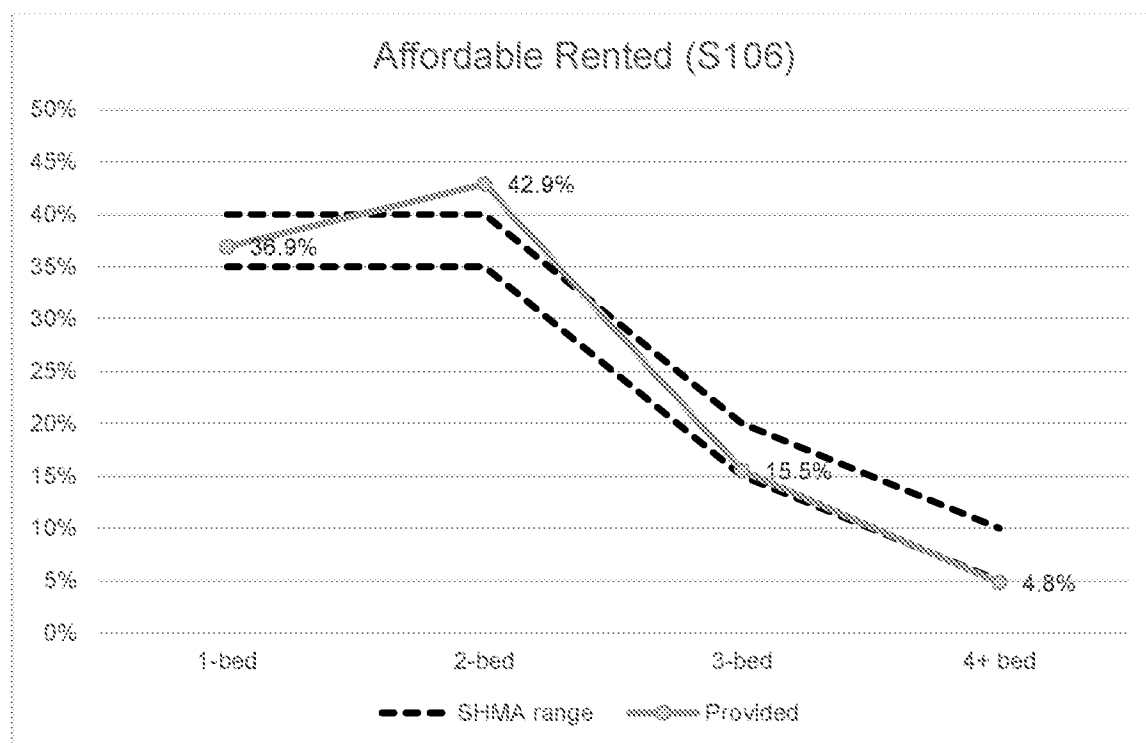
On balance, we believe this is an appropriate response and indeed one which goes beyond formal requirements. With finite land on the site, and the imperative nature of the Appropriate Assessment and mitigation land, any additional on-site allotments would require reduced housing provision. Some 25 homes have already been removed from the site through the amendments, and given the national housing crisis and particularly low delivery in Arun, we believe it is important to maintain housing delivery.

Housing mix

As required from the Outline application, precisely **30%** of the units (105 dwellings) will be delivered in affordable tenures per the requirements of the Section 106 agreement. The mix of Affordable Rented and Shared Ownership units is shown in the table below.

Delivery via S.106 agreement in accordance with outline					
Tenure	1-bed	2-bed	3-bed	4-bed	Total
AR units	31	36	13	4	84
(% provided)	(36.9%)	(42.9%)	(15.5%)	(4.8%)	
(range sought by SHMA)	(35-40%)	(35-40%)	(15-20%)	(5-10%)	
SO units	2	11	7	1	21
(% provided)	(9.5%)	(52.4%)	(33.3%)	(4.8%)	
(range sought by SHMA)	(10-15%)	(50-55%)	(25-30%)	(0-5%)	
Total S106 units	33	47	20	5	105

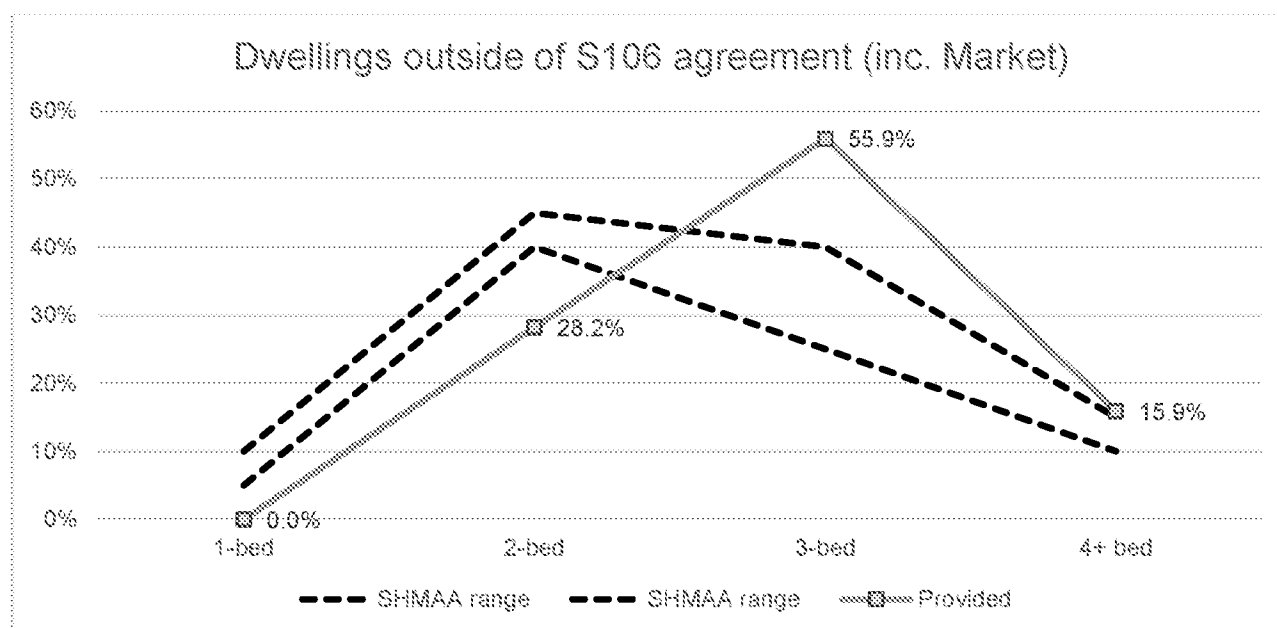
As is apparent, the provision of units is overwhelmingly within the SHMA's guidance ranges for each tenure and size to be delivered under the terms of the S106 agreement, and with the desired tenure split of 20% Shared Ownership and 80% affordable rented. To assist with clarity, please see the graphs below which illustrate the proposed mix in relation to the ranges contained in the SHMA.



For the 70% of dwellings to be delivered *outside* of the S.106 agreement, the proposed mix is as shown below.

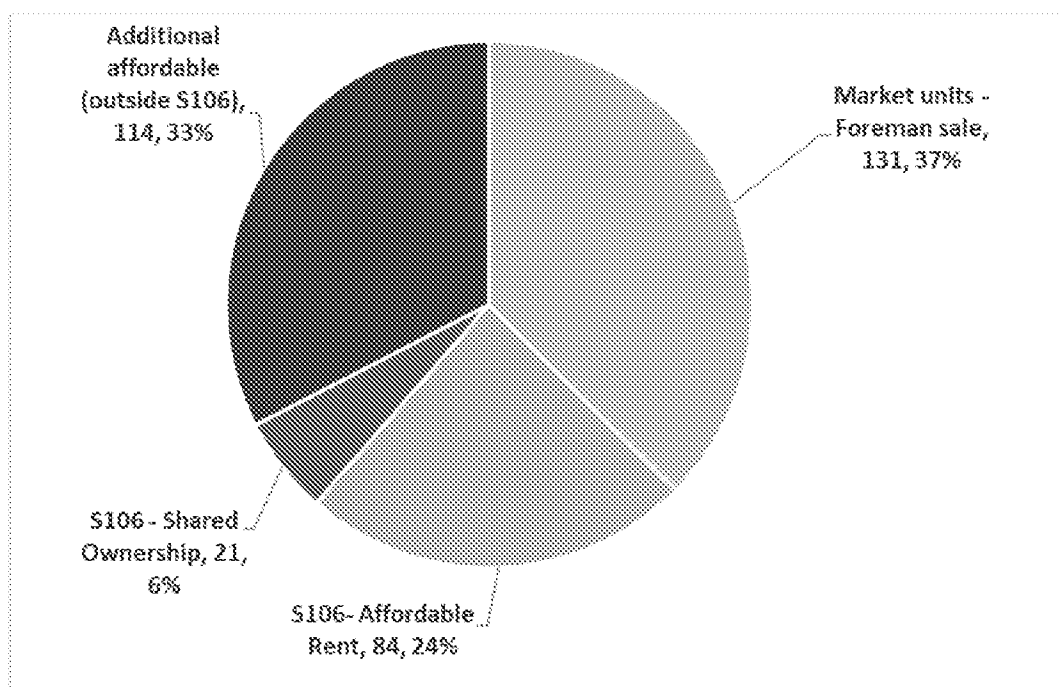
Units outside of S106 agreement					
	1-bed	2-bed	3-bed	4-bed	Total
Units outside of S.106 agreement	0	69	137	39	245
<i>(% provided)</i>	<i>(0%)</i>	<i>(28.2%)</i>	<i>(55.9%)</i>	<i>(15.9%)</i>	
<i>(range sought by SHMA for Market units)</i>	<i>(5-10%)</i>	<i>(40-45%)</i>	<i>(25-40%)</i>	<i>(10-15%)</i>	

As illustrated in the below chart, although the proposed mix falls somewhat outside of the SHMA guidelines, the mix still follows a similar 'trajectory' in terms of prioritising 2 and 3 bedroom units, with fewer 1 and 4 bedroom units. Particular emphasis has been given in this proposed mix to 3-bed units, i.e. medium sized family homes which are particularly in demand.



To the extent that the above differs from the SHMA, it should be emphasised that the SHMA relates to the whole of Arun district over the whole plan period, potentially covering several economic cycles. Planning policy does not require any one site to precisely accord with the guidance, and typically urban sites will over-provide on 1-bed and 2-bed units, counterbalancing provision of larger family homes on larger edge-of-settlement schemes such as this. Hence overall we believe the above mix is suitable, and relates well to the Design Code and masterplan it relates to.

The mode of delivering the non-S106 homes is also important. Ordinarily, homes delivered outside of the S106 agreement (in this case 245 units or 70%) would be delivered via private sale *only* and thus fall under the bracket of 'Market' housing per the table above. However, in this instance Pagham Homes have entered into a contract with Vivid (the housing association) for 114 of these units. As a result, the total number of homes ultimately delivered in affordable tenures (both within and outside of the S106 agreement) rises to **62.6%**, with only **37.4%** (113 units) sold on the open market.



Overall we believe that the proposed mix is highly appropriate and beneficial to the local community and to Arun in general, and we trust this will be duly taken on board as the application proceeds.

Summary and next steps

On behalf of Pagham Homes and our consultant team thank you again for your work on this application. When you are able, we would be grateful if you could confirm your intentions by way of re-consultation and taking the application forward to committee. As noted before we are happy to discuss a further formal Extension of Time necessary for this process.

I look forward to speaking further in due course, and please do not hesitate to drop me a direct line with any queries.

Yours sincerely



Jon Gateley
Savills Planning

cc. Jessica Riches